

# City of Banning

# ***Housing Element***

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2021-2029

City of Banning  
99 East Ramsey Street  
Banning, California 92220

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# 1 Introduction

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## 1.1 City Profile

Incorporated in 1913, the City of Banning (herein referred to as “City”) is a growing city that has maintained its small-town atmosphere. Initially serving as a stagecoach and railroad stop between the Arizona territories and Los Angeles, the City had a 2020 population of 31,125 residents.

The City of Banning is located in the San Gorgonio Pass Region of western Riverside County, approximately 21 miles east of the City of Riverside. The US Interstate-10 (I-10) corridor runs east-west through the City. Surrounding locations include the City of Beaumont to the west, the Morongo Indian Reservation to the northeast, and the town of Cabazon to the east. The City of Banning encompasses about 23.1 square miles. Most of the City’s urban development is residential and commercial, concentrated between north of I-10 and south of the San Bernardino Mountains. Public and private open spaces are interspersed throughout the City. Commercial and industrial land uses are generally clustered along I-10 and the Union Pacific Railroad, and near the Banning Municipal Airport.

Banning is well known for its picturesque qualities, nestled between the majestic San Gorgonio and San Jacinto mountains – the two tallest peaks in Southern California. The community enjoys a quiet, rural lifestyle with nearby outdoor opportunities.

## 1.2 Purpose of the Housing Element

According to California Government Code Section 65302, the General Plan is required to consist of seven State-mandated elements, including land use, circulation, housing, conservation, open space, noise, and safety. The Housing Element is one of the seven State-mandated elements of the General Plan and must be updated every four, five, or eight years as mandated by California Government Code Section 65581. The purpose of the Housing Element is to craft a comprehensive strategy for providing safe, decent, and affordable housing within the community. The Housing Element has two main purposes:

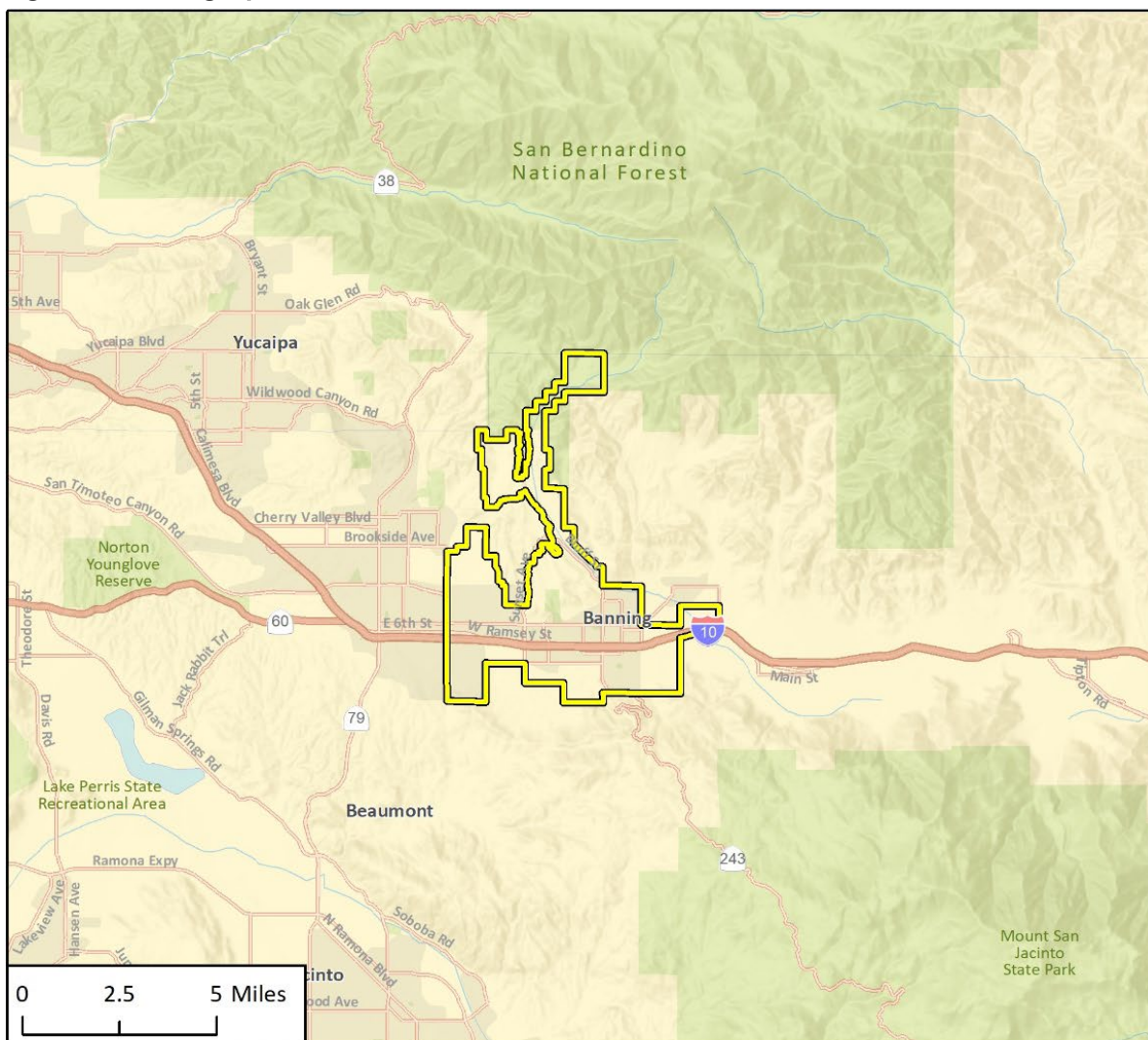
- To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
- To provide a strategy that establishes housing goals, policies, and programs.

This Housing Element represents the City of Banning’s 6<sup>th</sup> Housing Element cycle and will be carried out from 2021 through 2029.

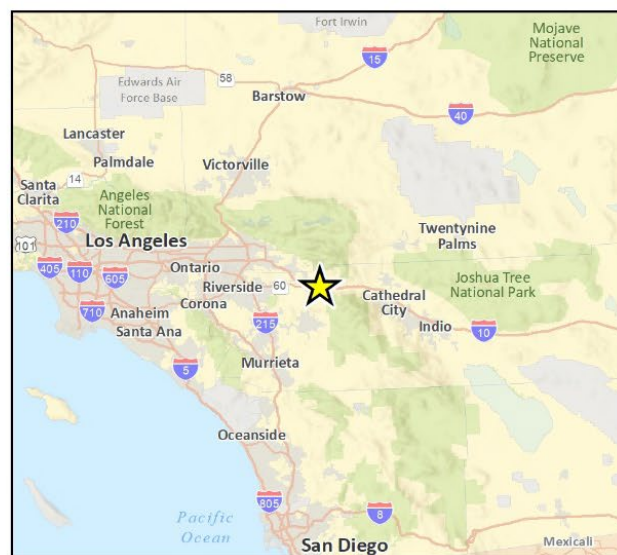
## 1.3 Relationship to Other General Plan Elements

The City of Banning’s General Plan was adopted in 2006 and was last updated in 2019. The General Plan is comprised of the following elements: Land Use; Economic Development; Circulation; Parks and Recreation; Housing; Water Resources; Open Space and Conservation; Biological Resources; Archaeological and Historic Resources; Air Quality; Energy and Mineral Resources; Geotechnical; Flooding and Hydrology, Noise; Wildland Fire Hazards; Hazardous and Toxic Materials; Water, Wastewater, and Utilities; Public Building and Facilities; Schools and Libraries; Police and Fire

### Figure 1 Geographic Location



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Protection; and Emergency Preparedness. California Government Code Section 65583 (c) requires the Housing Element to maintain internal consistency with other General Plan Elements. At this time, the Housing Element is being updated in conformance with the 2021-2029 update cycle for jurisdictions in the Southern California Association of Governments (SCAG) region in addition to the California Government Code requirements. The Housing Element builds upon policies set forth in the other General Plan elements; for instance, the Land Use Element establishes policies regarding the amount, intensity, and distribution of residential uses. The City will maintain and ensure internal consistency among General Plan elements as portions of the General Plan are amended.

## 1.4 Organization of the Housing Element

The Banning Housing Element is comprised of the following major components:

- Introduction: a brief overview of the purpose and background for the Housing Element.
- Community Profile: an assessment of the City’s demographic and housing market characteristics and their correlation to housing needs in the community.
- Constraints to the Provision of Housing: an analysis of the various market, governmental, and environmental constraints in the City and their impact on the development and preservation of housing in Banning.
- Housing Opportunities and Resources: an inventory of land, financial, and administrative resources available to facilitate housing development in the City. Opportunities for energy conservation are also discussed.
- Housing Plan: An outline of the City’s proposed actions and objectives over the next eight years in addressing the housing needs of the community and complying with State law.

## 1.5 Sources of Information

This Housing Element was updated with various sources of data, including:

- Census Bureau and American Community Survey (ACS)
- Department of Finance (DOF)
- Southern California Association of Governments (SCAG)
- Home Mortgage Disclosure Act (HMDA) lending data
- Regional Homeless Point-in-Time Count
- State Department of Social Services database on residential care facilities
- State Employment Development Department (EDD) data on wage and labor statistics

## 1.6 Public Participation

The City of Banning values community input and offers various opportunities for residents and community stakeholders to provide input on housing and community development issues. The following summarizes the City’s community outreach efforts during the Housing Element development process.

The City hosted a webpage dedicated to the Housing Element Update:

<https://banningca.gov/428/Housing-Element>. The webpage offered an informational flyer about the

Housing Element Update in English and Spanish. A record of the webpage and the flyer is included in Appendix A. The website has a “select language” feature which allows translation in a multitude of languages.

On April 13, 2021, the City conducted a joint Planning Commission and City Council study session for the Housing Element Update that was open to the public. Rincon provided a short presentation about the Housing Element update and led a question and answer session. The purpose of this meeting was to collect information and feedback from the Planning Commission, City Council, and community members on the Housing Element Update. There were no public comments provided at this session.

Additionally, the City hosted an online community engagement survey to collect input from Banning residents and housing and services providers. Due to the COVID-19 pandemic, and social distancing requirements in place during 2020 and 2021, it was not possible to survey the public in person. The survey was featured on the City’s webpage as a splash announcement and was advertised on the City’s Facebook page, with links to the surveys embedded in both advertisements. The survey asked questions regarding current living situations and opinions on various housing issues and approaches. This survey was circulated from May 13, 2021 to June 30, 2021. A copy of the survey and the survey results are included in Appendix A. A total of 79 responses were received. The majority of respondents affirmed the following opinions:

- Respondents who own a single-family home would most likely consider adding an accessory dwelling unit (ADU) due to the ability to provide separate living quarters for someone in the family, inexpensive permitting fees, and a simple permitting process.
- Financial assistance programs such as rental assistance and down payment assistance programs, and having more housing types available, are the most effective approaches to provide the best options for housing in the City.
- The best approaches for providing housing are to have more housing types available in the City, and to offer financial assistance programs such as rental and down payment assistance.
- New housing should be located throughout the City.
- Areas within walking distance of public transit and commercial centers are the most suitable for high-density housing.
- The most effective ways that the City could provide housing opportunities for all incomes are to repurpose older or underutilized commercial centers and create less restrictive development standards for housing to be developed near commercial centers.

The City hosted a public workshop open to the community on June 2, 2021. A copy of the flyer for the workshop is included in Appendix A. Rincon provided a short presentation about the Housing Element update, survey results, and potential housing sites. Feedback from the joint session and community workshop identified the following issues and concerns:

- Concern regarding the provision of sufficient sites for feasible development and maintaining consistency with Senate Bill (SB) 330 (Housing Accountability Act) and SB 166 (No Net Loss) requirements.
- Request for consideration of potential funding sources for affordable housing development, including potential nexus with economic development opportunities (i.e. Banning’s two designated Opportunity Zones).

The Draft Housing Element was available for public review from July 14, 2021 through September 27, 2021, and a revised version was made available from October 5, 2021 through October 25, 2021. The document was posted on the City's website and was promoted via social media. The public was invited to comment on the Housing Element during the July 14, 2021 Planning Commission meeting, and during the Planning Commission and City Council meetings held October 19, 2021, and November 9, 2021. No public comments were received during the public meetings.

As a response to comments received from the public survey and community workshop, the City developed a sites inventory of sites suitable for low-income housing development with a buffer of 17 percent of the RHNA allocation. The City also responded to the desire of the community to locate housing throughout the City, as reflected in the sites inventory which includes vacant residential parcels that are dispersed throughout the City. In response to public input, the sites inventory also concentrates potential rezone high-density residential sites generally near public transit stops. In addition, the majority of non-vacant residential sites that could be redeveloped are located in or near commercial centers and in the City's two Opportunity Zones for economic development.

Additionally, in response to public input from the survey and discussion regarding funding opportunities and concerns for affordable housing, the City will continue and/or expand programs to:

- Seek appropriate funding opportunities for affordable housing development.
- Address the regulatory, financial, and other constraints to developing supportive and affordable housing.

In February 2022 the California Department of Housing and Community Development (HCD) forwarded a letter with a comment tracker to the City. City staff worked to address the issues cited by HCD and submitted a revised draft Housing Element to HCD for an informal review in January 2023. In May 2023, HCD replied with a letter stating additional revisions were requested. In July 2023, HCD sent a non-compliance letter to the City of Banning which led to a September 20, 2023 meeting between HCD staff, City staff, and consulting staff to set a schedule for readoption of the Housing Element.

After the City received the informal review comments from HCD in May 2023, revisions were made to the final draft Housing Element, and a public workshop was held on August 18, 2023. During the workshop, staff explained why HCD did not certify the Housing Element, what steps were needed to complete a revised final draft and introduced a proposed schedule for readoption. Approximately 12 people attended the two-hour long workshop and were actively engaged, but no new issues or topics were discussed or recommended for inclusion. A second workshop was held before the Planning Commission on October 18, 2023. A public notice informing the public about the workshop and inviting their participation was published in the Record Gazette on October 6, 2023. Additionally, the City's social media pages were updated.

The City held public hearings with the Planning Commission and City Council to readopt the Housing Element on December 6, 2023, and January 9, 2024, respectively. There were three public speakers at the City Council public hearing who spoke against the provision of affordable housing. No substantive issues concerning the Housing Element were brought up by the public speakers.

The Housing Element was made available for public review on the City's website and interested parties were notified via email prior to the City Council hearing, and again when the adopted Housing Element was made available for public comment on January 18, 2024. The City placed a slide on the website homepage marquee with a redirect link to the revised Housing Element

adopted by the City Council on January 9, 2024. The public review period was extended to January 29, 2024. No written comments were submitted during the public review period.

## 2 Housing Needs Assessment

Ensuring adequate housing for all Banning’s present and future residents is a primary housing goal for the City. To realize this goal, the City must effectively target its programs and resources toward those households with the greatest need. This chapter discusses the characteristics of the City population and housing stock in order to better define the nature and extent of unmet housing needs in Banning.

### 2.1 Population Characteristics

Population characteristics affect the type and amount of housing needed in a community. Factors such as population growth, age and income distribution, and employment trends influence needs such as the type of housing needed and the ability to afford housing. The following section describes and analyzes the various population characteristics and trends that affect housing need.

### 2.2 Population Growth

Population characteristics affect the type and amount of housing needed in a community. Factors such as population growth, age and income distribution, and employment trends influence needs such as the type of housing needed and the ability to afford housing. The following section describes and analyzes the various population characteristics and trends that affect housing need.

As shown in Table 1, the City of Banning’s population increased from 23,562 in 2000 to 29,603 in 2010. Between 2010 and 2020, the City grew by an additional 5.1 percent. Most of the City’s growth occurred from 2000 through 2005, when the population increased by 20.1 percent and the growth rate significantly outpaced growth in the neighboring City of Calimesa; however, the City of Banning did not outpace growth countywide. The City grew more slowly when compared to the County and surrounding cities between 2000 and 2005 (20.1 percent vs. 27.9 percent).

**Table 1 Population Growth**

| Jurisdiction     | 2000      | 2005      | 2010      | 2015      | 2020      | Percent Change 2000-2005 | Percent Change 2005-2010 | Percent Change 2010-2020 |
|------------------|-----------|-----------|-----------|-----------|-----------|--------------------------|--------------------------|--------------------------|
| Banning          | 23,562    | 28,301    | 29,603    | 30,542    | 31,125    | 20.1%                    | 4.6%                     | 5.1%                     |
| Beaumont         | 11,384    | 20,090    | 36,877    | 43,108    | 51,475    | 76.5%                    | 83.6%                    | 39.6%                    |
| Calimesa         | 7,139     | 7,601     | 7,879     | 8,289     | 9,329     | 6.5%                     | 3.7%                     | 18.4%                    |
| San Jacinto      | 23,779    | 31,811    | 44,199    | 46,923    | 51,028    | 33.8%                    | 38.9%                    | 15.5%                    |
| Moreno Valley    | 142,379   | 167,262   | 193,365   | 200,818   | 208,838   | 17.5%                    | 15.6%                    | 8.0%                     |
| Riverside County | 1,545,387 | 1,975,913 | 2,189,641 | 2,315,706 | 2,442,304 | 27.9%                    | 10.8%                    | 11.5%                    |

Source: SCAG Pre-Certified Local Housing Data 2020, SCAG Local Profiles Report 2019



## 2.3 Age Characteristics

A community's current and future housing needs are determined in part by the age characteristics of residents. Typically, each age group has distinct lifestyles, family types and sizes, ability to earn incomes, and housing preferences, and as people move through each state of life, housing needs and preferences change. Traditionally, both the young adult population (20-34 years of age) and the elderly population (65 years and over) tend to favor apartments, low to moderately priced condominiums, and smaller single-family units. Persons between 35-64 years old (and households with school-age children) usually provide the major market for moderate to high-cost apartments, condominiums, and larger single-family units, because they tend to have higher and/or dual incomes and larger household sizes. Table 2 shows the populations by age group in the City in 2014 and 2019. One of the most noticeable changes is the population of adults age 35-44, which increased by approximately 2.6 percent between 2014 and 2019 and has had a larger increase compared to other age groups. Seniors (aged 65+) made up the largest proportion of the population (approximately 27.4 percent) in 2019.

The number of residents under five years of age decreased approximately 0.3 percent between 2014 and 2019, while school-age residents (aged 5-19) increased 2.0 percent. The proportion of children and young adults (aged 25-34) decreased 0.3 percent in the City, while adults age 35-44 years saw a slight increase of 2.6 percent. The percent of population over age 45 decreased, corresponding with a decrease in the median resident age.

**Table 2 Age Characteristics**

| Age Groups                 | 2014              |                  | 2019              |                  | Percent Change (2014-2019) |
|----------------------------|-------------------|------------------|-------------------|------------------|----------------------------|
|                            | Banning Residents | Percent of Total | Banning Residents | Percent of Total |                            |
| Preschool (under 5 years)  | 1,988             | 6.6%             | 1,962             | 6.3%             | -0.3%                      |
| School Age (5-9 years)     | 1,545             | 5.1%             | 1,916             | 6.2%             | 1.1%                       |
| School Age (10-14 years)   | 1,538             | 5.1%             | 1,875             | 6.0%             | 0.9%                       |
| School Age (15-19 years)   | 1,865             | 6.2%             | 1,926             | 6.2%             | 0.0%                       |
| College Age (20-24 years)  | 2,031             | 6.7%             | 2,039             | 6.6%             | -0.1%                      |
| Young Adults (25-34 years) | 3,572             | 11.8%            | 3,565             | 11.5%            | -0.3%                      |
| Adults (35-44 years)       | 2,567             | 8.5%             | 3,451             | 11.1%            | 2.6%                       |
| Adults (45-54 years)       | 3,466             | 11.4%            | 2,925             | 9.4%             | -2.0%                      |
| Adults (55-59 years)       | 1,688             | 5.6%             | 1,600             | 5.1%             | -0.5%                      |
| Adults (60-64 years)       | 1,553             | 5.1%             | 1,287             | 4.1%             | -1.0%                      |
| Seniors (65+ years)        | 8,468             | 28.0%            | 8,526             | 27.4%            | -0.6%                      |
| <b>Total Population</b>    | <b>30,281</b>     | <b>100.0%</b>    | <b>31,072</b>     | <b>100.0%</b>    |                            |
| Median Age                 | 45.1              |                  | 41.5              |                  |                            |

Source: American Community Survey 2010-2014, 2015-2019

Totals may not add up due to rounding.

## 2.4 Race and Ethnicity

As shown below in Table 3, Hispanic residents comprised the largest racial/ethnic group in Banning in 2019 (47 percent), followed by Non-Hispanic White residents (36 percent). Between 2014 and 2019, the rate at which the proportion of the Hispanic population grew (7.5 percent) was larger in comparison to that of any other racial/ethnic category. The City saw a slight increase in the proportion of the population that identified as Native American, Black or African American, other race alone, and two or more races between 2014 and 2019. In contrast, the proportion of the Asian American and Native Hawaiian and Other Pacific Islander populations slightly declined, and the proportion of the Non-Hispanic White population decreased by nearly 10 percent.

**Table 3 Race and Ethnicity**

| Race/Ethnic Group                          | 2014              |                  | 2019              |                  | Percent Change (2014-2019) |
|--|-------------------|------------------|-------------------|------------------|----------------------------|
|  | Banning Residents | Percent of Total | Banning Residents | Percent of Total |                            |
| White (Non-Hispanic)                       | 13,905            | 45.9%            | 11,181            | 36.0%            | -9.9                       |
| Black, Non-Hispanic                        | 2,223             | 7.3%             | 2,416             | 7.8%             | 0.5                        |
| Native American                            | 183               | 0.6%             | 815               | 2.6%             | 2.0                        |
| Asian                                      | 1,528             | 5.0%             | 1,402             | 4.5%             | -0.5                       |
| Two or more                                | 414               | 1.4%             | 408               | 1.3%             | -0.1                       |
| Hispanic                                   | 11,965            | 39.5%            | 14,605            | 47.0%            | 7.5                        |
| Native Hawaiian and Other Pacific Islander | 27                | 0.1%             | 5                 | 0.0%             | -0.1                       |
| Other Race Alone                           | 36                | 0.1%             | 240               | 0.8%             | 0.7                        |
| <b>Total</b>                               | <b>30,281</b>     | <b>100.0%</b>    | <b>31,072</b>     | <b>100.0%</b>    |                            |

Source: American Community Survey, 2010-2014, 2015-2019

Totals may not add up due to rounding.

## 2.5 Economic Characteristics

Employment has an important impact on housing needs. Incomes associated with different jobs and the number of workers in a household determines the type and size of housing a household can afford. Higher-paying jobs provide broader housing opportunities for residents, while lower-paying jobs limit housing options. In addition, employment growth is a major factor affecting the demand for housing in a community. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and large amounts of seasonal agriculture).

### 2.5.1 Employment

The City had 9,761 employed residents, representing a labor force participation rate of 38.7 percent of persons 16 years and over. Table 4 shows the number of persons employed in each occupation sector and the corresponding percentage of the labor force. The unemployment rate was 4.0 percent compared to the County's unemployment rate of 4.5 percent. The largest occupation sector for Banning residents was educational, health care and social assistance, followed by retail trade and arts, entertainment, and recreation, accommodation, and food services.

The employment figures shown in the table below reflect conditions prior to 2020 (2015-2019 ACS data). The price paid for material and labor at any one time reflect short-term considerations of supply and demand. Costs and employment have moderated somewhat due to fluctuations that followed the 2008 downturn, and more recently, from supply accessibility during the COVID-19 pandemic. Future costs and employment are difficult to predict given the cyclical fluctuations in demand and supply that, in large part, are created by fluctuations in State and national economies. During the COVID-19 pandemic and closure orders from the County of Riverside beginning March 2020, the unemployment rate increased dramatically in the Riverside-San Bernardino-Ontario metropolitan area (the highest level at more than 15 percent in April 2020), but has steadily declined since December 2020 and the most current rate provided (May 2021) is approximately 7.0 percent (State of California 2021). These circumstances impact employment in regions differently, and therefore do not deter housing construction or employment in any specific community.

**Table 4 Jobs Held By Banning residents**

| Occupation Sector   | Number of Jobs | Percent of Total |
|---|----------------|------------------|
| Agriculture, forestry, fishing and hunting, and mining                | 102            | 1.0%             |
| Construction  | 722            | 7.4%             |
| Manufacturing   | 828            | 8.5%             |
| Wholesale trade   | 282            | 2.9%             |
| Retail trade  | 1,678          | 17.2%            |
| Transportation and warehousing, and utilities                         | 647            | 6.6%             |
| Information   | 62             | 0.6%             |
| Finance, insurance, real estate, and rental and leasing               | 328            | 3.4%             |
| Professional, scientific, management, admin., and waste management    | 722            | 7.4%             |
| Educational, Health care and social assistance                        | 2,108          | 21.6%            |
| Arts, entertainment, and recreation, accommodation, and food services | 1,437          | 14.7%            |
| Other services, except public administration                          | 507            | 5.2%             |
| Public Administration   | 338            | 3.5%             |
| <b>Total Employed Population</b>                                      | <b>9,761</b>   | <b>100.0%</b>    |
| Source: American Community Survey 2015-2019                           |                |                  |
| Totals may not add up due to rounding.                                |                |                  |

Banning's proximity to I-10 makes this area an attractive location for firms seeking ready access to markets in Riverside County. A number of major employers are located in or near Banning. As shown in Table 5, major employers in and near the City include the County of Riverside, March Air Reserve Base, and University of California Riverside.

**Table 5 Major Employers in Riverside County**

| <b>Name of Employer</b>                    | <b>Number of Employees</b> | <b>Percent of Total County Employment</b> | <b>Type of Business</b> |
|--|----------------------------|---|-------------------------|
| County of Riverside                        | 21,215                     | 2.1%                                      | County Gov.             |
| March Air Reserve Base                     | 9,000                      | 0.9%                                      | Military                |
| Univ. of Calif. Riverside                  | 8,735                      | 0.8%                                      | Education               |
| Kaiser Permanente Riverside Medical Center | 5,592                      | 0.5%                                      | Medical                 |
| Corona-Norco Unified School District       | 4,989                      | 0.5%                                      | School District         |
| Pechanga Resort & Casino                   | 4,863                      | 0.5%                                      | Leisure/Hospitality     |
| Riverside Unified School District          | 4,236                      | 0.4%                                      | School District         |
| Hemet Unified School District              | 4,302                      | 0.4%                                      | School District         |
| Eisenhower Medical Center                  | 3,743                      | 0.4%                                      | Medical                 |
| Moreno Valley Unified School District      | 3,684                      | 0.4%                                      | School District         |

Source: Analysis of Impediments, 2019-2024

## 2.6 Household Characteristics

The Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories or other group living situations are not considered households. Household type and size, income levels, the presence of special needs populations, and other household characteristics determine the type of housing needed by residents, their preferences, and their ability to obtain housing that meets their needs. For example, single-person households, typified by seniors or young adults, tend to reside in apartment units or smaller single-family homes. Families typically prefer and occupy single-family homes. This section details the various household characteristics affecting housing needs.

### 2.6.1 Household Composition and Size

Unlike most cities, senior headed households (households with two individuals with either or both age 62 or over) represented the majority (48.7 percent) of Banning's 10,885 households in 2020. Families with children comprised 27.4 percent of the City's households, less than neighboring Beaumont and San Jacinto (Table 6). Among the 10,885 households, 53.5 percent were single-person households, and households headed by seniors (65+) comprised another 48.7 percent. As a percentage of total households, single-person households accounted for a greater percentage of total households when compared to Beaumont, Calimesa, San Jacinto, and Moreno Valley. The proportion of senior-headed households in the City was larger than the County and smaller than the other surrounding cities.

**Table 6 Household Characteristics**

|                               | Single Person Households | Senior Headed Households | Families with Children | Single-Parent Households | Large Households (Owner Occupied) | Large Households (Renter Occupied) |
|-------------------------------|--------------------------|--------------------------|------------------------|--------------------------|-----------------------------------|------------------------------------|
| Banning                       | 5,828                    | 5,305                    | 2,978                  | 865                      | 39.7%                             | 60.3%                              |
| Beaumont                      | 4,728                    | 3,455                    | 6,091                  | 1,008                    | 71.2%                             | 28.8%                              |
| Calimesa                      | 1,434                    | 1,633                    | 751                    | 1,434                    | 83.6%                             | 16.4%                              |
| San Jacinto                   | 5,263                    | 3,384                    | 5,830                  | 1,238                    | 64.3%                             | 35.7%                              |
| Moreno Valley                 | 19,024                   | 7,125                    | 25,385                 | 5,009                    | 60.1%                             | 39.9%                              |
| Riverside County <sup>1</sup> | 288,943                  | 72,436                   | 272,835                | 46,632                   | N/A                               | N/A                                |

N/A = not available

<sup>1</sup> SCAG notes that 20 percent of Riverside County households were large households, but SCAG data does not show the percentage of renters versus owners.

Source: American Community Survey, 2015-2019, SCAG 2019

## 2.7 Overcrowding

The State Department of Housing and Community Development (HCD) defines an overcrowded household as one with more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Overcrowding in households results from either a lack of affordable housing (which forces an increased number of persons to live together) and/or a lack of available housing units of adequate size.

Household size is a significant factor in housing demand. Often, household size can be used to predict the unit size that a household will select. For example, small households (one and two persons per household) traditionally can find suitable housing in units with up to two bedrooms while large households (five or more persons per household) can usually find suitable housing in units with three to four bedrooms. People's choices, however, also reflect preference and economics and many households extended beyond their financial means and purchased large homes. The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens). Units with more than 1.5 persons per room are considered severely overcrowded.

Banning had an average of 2.72 persons per household in 2018, representing a small increase from 2010, when an average of 2.61 persons per household was recorded. The percent of overcrowded households in the City decreased from 13 percent in 2010 to 6.3 percent in 2018. The percent of overcrowded households in the City was slightly below the County's rate of 6.9 percent in 2019 and was far below the rate of nearby cities such as Moreno Valley and Beaumont. Table 7 shows the average household size in Banning, neighboring cities, and the County.

SCAG certified local housing data indicates that Banning has 196 owner-occupied and 518 renter-occupied households with more than 1.0 occupant per room, meeting ACS definition for overcrowding. This equates to 3.4 percent of owner-occupied households as overcrowded, and 18.5 percent of renter-occupied households as overcrowded.

**Table 7 Average Household Size and Overcrowded Households**

| Jurisdiction     | Average Household Size | Percent of Households That Are Overcrowded |
|------------------|------------------------|--|
| Banning          | 2.69                   | 6.3%                                       |
| Beaumont         | 3.18                   | 11.7%                                      |
| Calimesa         | 2.71                   | 2.2%                                       |
| San Jacinto      | 3.72                   | 6.4%                                       |
| Moreno Valley    | 3.85                   | 28%  |
| Riverside County | 3.28                   | 6.9%                                       |

Source: SCAG Pre-Certified Local Housing Data 2020, ACS American Community Survey, 2015-2019.

## 2.8 Income Distribution

Household income is directly connected to the ability of a household to afford housing. As household income increases, the likelihood of homeownership increases. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the likelihood of overcrowded conditions increases.

For planning and funding purposes, HCD has developed the following income categories based on the Area Median Income (AMI) of a metropolitan area:

- Extremely low-income: households earning up to 30 percent of the AMI
- Very low-income: households earning between 31 and 50 percent of the AMI
- Low-Income: households earning between 51 percent and 80 percent of the AMI
- Moderate-Income: households earning between 81 percent and 120 percent of the AMI
- Above Moderate-income: households earning over 120 percent of the AMI

Information on Banning household income distribution was taken from the SCAG RHNA Final Allocation Calculator, which used 2013-2017 ACS data. The calculator combines extremely low-income and very low-income categories. As shown in Table 8, approximately 36 percent of Banning households were considered extremely low or very low-income, which means they earned less than 50 percent of the AMI. Low-income households (50 to 80 percent AMI) comprised 24 percent of the City's households, while moderate and above-moderate income households comprised 40 percent of the City.

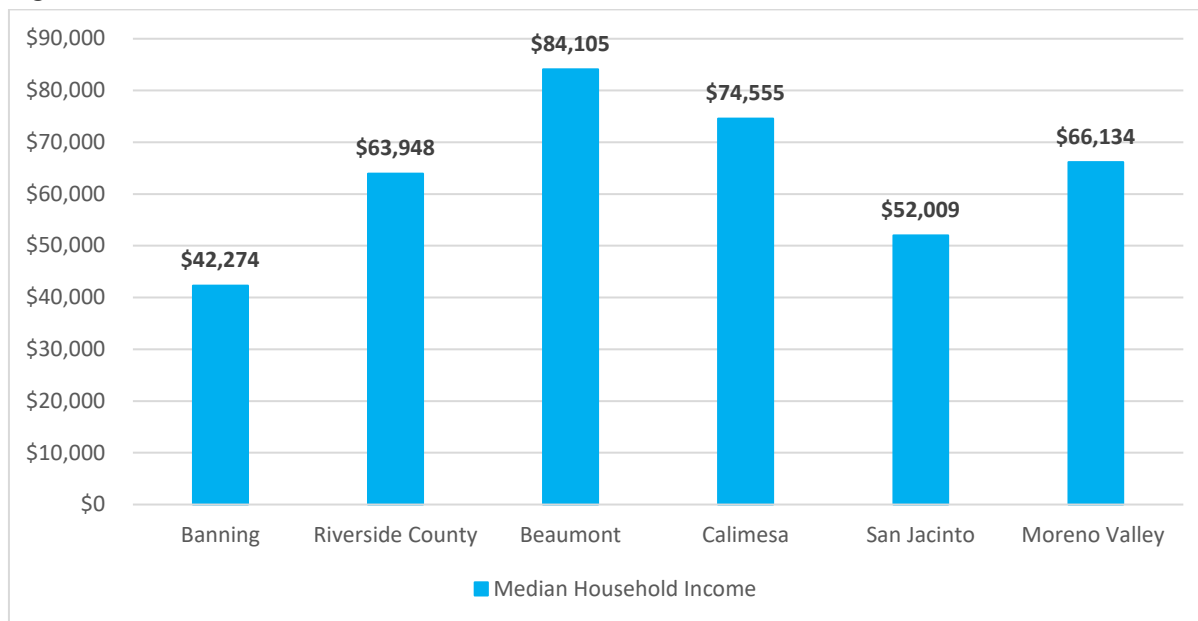
**Table 8 Households by Income Category**

| Income Category                        | Percent |
|--|---------|
| Extremely Low/Very Low (below 50% AMI) | 36%     |
| Low (50 to 80% AMI)                    | 24%     |
| Moderate (80 to 120% AMI)              | 19%     |
| Above Moderate (above 120% AMI)        | 21%     |
| Total                                  | 100.0%  |

Source: SCAG RHNA Final Allocation Calculator: <https://scag.ca.gov/rhna> (ACS 2013-2017 data)

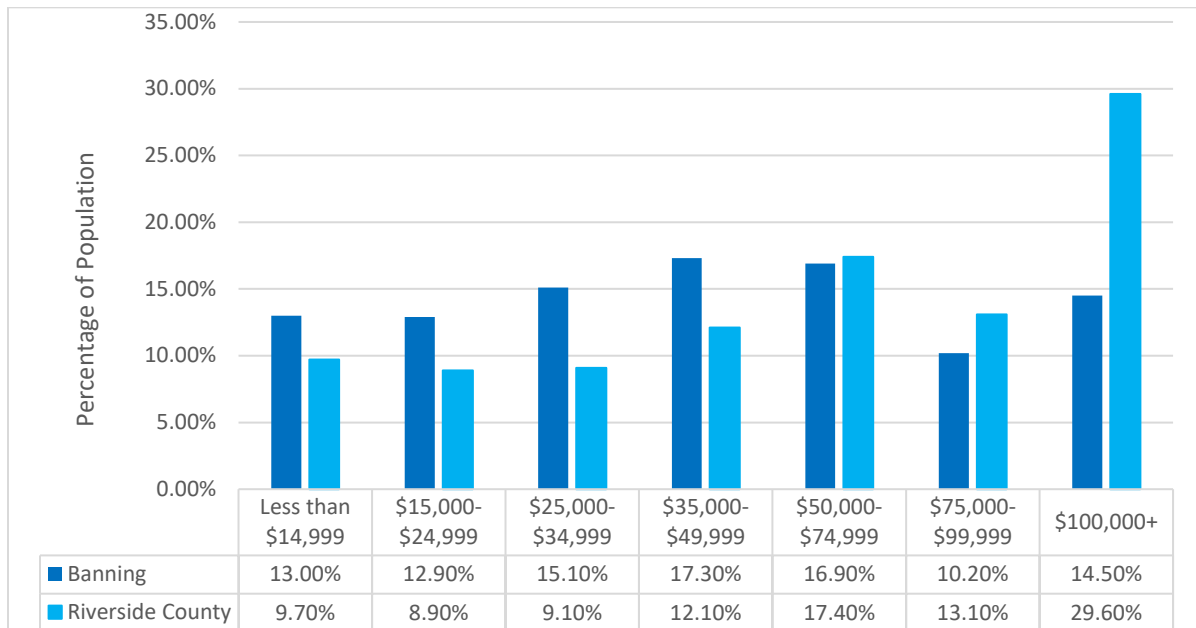
Median household income in Banning is lower than the median household income of the County of Riverside and neighboring cities. The 2015-2019 ACS estimates that the median household income in Banning was \$42,274, compared to \$63,948 in the County. Figure 2 compares the median household income in Banning, Riverside County, and neighboring cities.

**Figure 2 Median Household Income**



Source: American Community Survey 2015-2019

As shown in Figure 3, approximately 25.9 percent of Banning's households had a median household income of less than \$25,000, a larger share than for the County. In contrast, about 14.5 percent of Banning's households had a median household income of \$100,000 or more, less than the nearly 30 percent of households in the County. Unlike the County, the City had a more even distribution of income levels, with the highest percentage of households with a moderate-income range between \$35,000 to \$49,999.

**Figure 3 Median Annual Household Income**

Source: American Community Survey 2015-2019

## 2.9 Special Needs Groups

Certain segments of the population may have more difficulty in finding decent, affordable housing due to their special needs. Special circumstances may be related to employment and income, family characteristics, disability, household characteristics, or other factors. Table 9 lists special needs groups in Banning identified in this Housing Element: seniors, persons with disabilities, large households, single parents, people living in poverty, farmworkers, and people experiencing homelessness. Many of these groups overlap. Increasing the availability of affordable housing may alleviate housing insecurities among special needs groups, especially if located near public transportation and services.



**Table 9 Special Needs Groups in Banning**

| Special Needs Group                    | Number of Persons or Households | Percent of Total Persons <sup>1</sup> | Percent of Total Households <sup>2</sup> |
|--|---------------------------------|---------------------------------------|--|
| Persons with Disabilities              | 5,704 Persons                   | 19.0                                  | –  |
| Elderly Households <sup>3</sup>        | 5,305 Households                | –                                     | 48.7                                     |
| Female-Headed Households               | 1,498 Households                | –                                     | 13.8                                     |
| Large Households <sup>4</sup>          | 1,349 Households                | –                                     | 12.4                                     |
| Households in Poverty                  | 1,146 Households                | –                                     | 10.5                                     |
| Single-Parent Households               | 865 Households                  | 2.7                                   | –  |
| Female-Headed Households with Children | 769 Households                  | –                                     | 7.1                                      |
| Farmworkers <sup>5</sup>               | 55 Persons                      | 1.8                                   | –  |
| Unsheltered Persons                    | 43 Persons                      | 1.3                                   | –  |

American Community Survey 2015-2019, SCAG Pre-Certified Local Housing Data 2020

<sup>1</sup> Population estimate of 31,125.

<sup>2</sup> 10,885 total households.

<sup>3</sup> Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over.

<sup>4</sup> Five or more members under one household.

<sup>5</sup> Total jobs: Farming, fishing, and forestry occupations.

Sources: 2020 Southern California Association of Governments (SCAG) Pre-Certified Local Housing Data, Banning; American Community Survey 2015-2019

The following sections provide a detailed discussion of the housing needs of each particular group and the existing programs and services available to address these needs.

## 2.9.1 Seniors

As a result of both income and rent changes in older age, severe housing cost burdens are more common among seniors, which can it difficult to find affordable housing. An estimated 8,526 persons age 65 and over reside in Banning, accounting for approximately 27 percent of the population, which is twice the proportion of seniors per population in Riverside County as a whole. SCAG identified 720 of the senior-headed households in Banning were renters (13.6 percent), while 4,585 owned their home (86.4 percent) (SCAG 2020). Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. Table 10 compares the share of senior populations for Banning, the County, and surrounding cities.

**Table 10 Persons Age 65 and Over**

| Jurisdiction     | Total Population | Age 65+ | Percent Age 65+ |
|------------------|------------------|---------|-----------------|
| Banning          | 31,072           | 8,526   | 27.4            |
| Beaumont         | 47,144           | 6,341   | 13.5            |
| Calimesa         | 8,814            | 2,394   | 27.2            |
| San Jacinto      | 47,989           | 5,466   | 11.4            |
| Moreno Valley    | 207,289          | 17,733  | 8.5             |
| Riverside County | 2,411,439        | 340,575 | 14.1            |

Source: American Community Survey 2015-2019

Housing cost burdens for seniors can be exacerbated by disabilities. Approximately 10 percent of Banning’s senior population has one or more disabilities, according to the 2015-2019 ACS.

## Resources for Seniors

The special needs of seniors can be met through a range of services, including congregate care, rent subsidies, shared housing, and housing rehabilitation assistance. For the elderly who are frail or have disabilities, housing can be modified with features that help ensure continued independent living arrangements.

Several licensed care facilities that provide assisted living, nursing care, and general services to seniors are located in Banning. The City does not regulate residential care homes for six or fewer persons; such homes are permitted by right in all residential zones as regular residential uses. Residential care homes for more than six persons are permitted in Medium-Density Residential (MDR) and High-Density Residential (HDR) zones, subject to a conditional use permit and additional requirements that provide clear guidance for the development of such facilities.

## 2.10 Persons with Disabilities (including Developmental Disabilities)

Physical, mental, and/or developmental disabilities may provide challenges to gaining employment or conducting self-care or mobility. Thus, persons with disabilities may experience housing burdens and challenges due to restricted income and/or accessibility needs. Persons with extreme disabilities may require housing in a supportive or institutional setting. According to ACS data, 5,704 residents had one or more disabilities, approximately 18.4 percent of Banning’s population. Table 11 shows the number of persons with disabled persons by age group.

**Table 11 Persons with Disabilities by Age Group in Banning**

|                           | Number of Disabilities Tallied |              |         |       |
|---------------------------|--------------------------------|--------------|---------|-------|
|                           | Age 5 to 17                    | Age 18 to 64 | Age 65+ | Total |
| Persons with Disabilities | 419                            | 2,091        | 3,194   | 5,704 |

Note: Includes persons with one or more disabilities

Source: ACS 5-Year Estimates, 2015-2019

Housing needs for persons with disabilities depends on the severity of the disability(ies). For persons with disabilities who live independently or with other family members, independent living can be supported with special housing features, financial support, and in-home supportive services.

Housing for persons with disabilities must be adapted according to individual needs. Various types of housing may be inaccessible to persons with mobility and sensory limitations. Housing may need to be adapted to accommodate widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility, and many housing types may not have suitable space for such adaptations. Location of housing is also an important factor for persons with mobility restrictions who rely on public transportation for travel.

## 2.11 Persons with Developmental Disabilities

State law requires the Housing Element to 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 18;
- 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.

Many persons with developmental disabilities can live and work independently in a conventional housing environment. More severely disabled individuals require a group living environment with supervision. The most severely affected individuals may require an institutional environment with medical services and physical therapy. Many persons with developmental disabilities require supportive services during the transition from childhood to a more independent living situation as an adult.

The State of California Department of Developmental Services Regional Center and Early Start Consumers lists the number of persons with developmental disabilities by zip code. As of December 2020, the number of youth (0-17 years of age) and adult (18 years or older) persons with developmental disabilities were reported for the following zip codes that overlap with the City’s boundaries:

- 92220: youth – 92; adults – 123
- 92223: youth – 262; adults – 217

In total, there are 354 youth and 340 adults with disabilities in these two zip codes; however, the 92220 zip code encompasses most of the City.

### **Resources for Persons with Disabilities**

State and federal legislation mandates that a percentage of units in new or substantially rehabilitated multi-family apartment complexes must be made accessible to individuals with limited physical mobility. For example, accessibility requirements for federally assisted housing with five or more units requires at least five percent of the dwelling units to be accessible for persons with mobility disabilities. The City does not regulate residential care homes for six or fewer persons; such homes are permitted in all residential zones as regular residential uses. Residential care homes for more than six persons are permitted in the MDR and HDR zones, subject to a conditional use permit and additional requirements that provide clear guidance for the development of such facilities. The City also offers flexibility with development standards and reasonable accommodations for housing development projects that propose housing affordable to seniors and persons with disabilities.

## 2.12 Large Households

Large households are defined as those consisting of five or more members under one household. These households are defined as a special needs group due to the limited supply of adequately sized and affordable housing units. To save for other basic necessities such as food, clothing, and medical care, lower-income large households tend to reside in smaller housing units, resulting in overcrowding and accelerated unit deterioration.

Table 12 compares the percent of large households in Banning to Riverside County as a whole, divided by homeowners and renters. The percentage of large households in Banning was approximately eight percent less than the County as a whole. As shown below, 1,349 large households in Banning comprise 12.4 percent of the total households, with 813 of these households being renters (approximately 60.3 percent) and 536 being homeowners (approximately 39.7 percent). According to the 2015-2019 ACS, there are 1,134 housing units in the City that are sufficient for large households (four or more bedrooms), which is 215 fewer than what is needed to accommodate all large households in the City. The ACS does not provide the tenure of household by number of bedrooms.

**Table 12 Large Households**

| Jurisdiction     | Large Households |                             | Homeowners |                             | Renters |                             |
|------------------|------------------|-----------------------------|------------|-----------------------------|---------|-----------------------------|
|                  | Number           | Percent of Total Households | Number     | Percent of Large Households | Number  | Percent of Large Households |
| Banning          | 1,349            | 12.4                        | 536        | 39.7                        | 813     | 60.3                        |
| Riverside County | 143,669          | 20.0                        | NA         | NA                          | NA      | NA                          |

Source: SCAG Profile of Riverside County, 2019; SCAG Local Pre-Certified Housing Data Banning, 2020

### Resources for Large Households

Lower and moderate-income large households can benefit from affordable housing programs. These include the City's Down Payment Assistance Program, Mortgage Credit Certificate program, affordable housing development assisted with City, State, and federal funds.

## 2.13 Female-Headed Households

Single-parent families, particularly female-headed families with children, often require special consideration and assistance because they have a higher housing cost burden relative to the general population and may require accessible day care, health care, and other supportive services. Female-headed families with children are a particularly vulnerable group because they must balance the needs of their children with work responsibilities, often while earning limited incomes.

Of Banning's 10,885 total households, 13.8 percent are female-headed. As shown below in Table 13, an estimated 7.9 percent of Banning households are headed by single parents with a majority of those households headed by women (7.1 percent of total households). This share is higher than the County as a whole, where approximately 4.8 percent of households are single-parent, female-headed households. Approximately 1.1 percent of total households in Banning are female-headed and with children under six years of age.

**Table 13 Single-Parent Households**

|                  | Total Households | Single-Parent Households | Percent of Total Households | Female-Headed Single-Parent Households | Percent Female-Headed Single-Parent Households |
|------------------|------------------|--------------------------|-----------------------------|--|--|
| Banning          | 10,885           | 865                      | 7.9                         | 769                                    | 7.1  |
| Riverside County | 13,044,266       | 803,397                  | 6.2                         | 631,664                                | 4.8  |

Source: ACS 2015-2019; SCAG Pre-Certified Local Housing Data, Banning 2020

## Resources for Single-Parent Households

Lower-income single-parent households can benefit from City programs that provide direct rental assistance or that facilitate the development of affordable housing. Affordable housing opportunities can also be expanded for low- and moderate-income single-parent households through the City's Mortgage Credit Certificate program.

## 2.14 Residents Living below the Poverty Line

Families, particularly female-headed families, are disproportionately affected by poverty. Poverty thresholds, as defined by the ACS, vary by household type. In 2018, a single individual under 65 was considered in poverty with a money income below \$13,064/year while the threshold for a family consisting of two adults and two children was \$25,465/year.

Approximately 10.5 percent of the City's total residents (1,146 persons) resided in households that earned an income below the poverty line. Approximately 47 percent of those residents resided in female-headed households, and approximately 38 percent resided in female-headed households with children.

### 2.14.1 Extremely Low-Income Population Analysis

Extremely low-income is defined as households with income less than 30 percent of area median income. The area median income in the City is \$42,274. For extremely low-income households, this results in an income of \$12,682 or less. Households with extremely low-income have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance are considered extremely low-income households.

From 2013-2017, approximately 1,765 extremely low-income households resided in the City, representing 16.3 percent of the total households. About half (55.5 percent) of extremely low-income households are renters and experience a high incidence of housing problems. For example, 85.7 percent of extremely low-income households faced housing problems (defined as cost burden greater than 30 percent of income and/or overcrowding and/or without complete kitchen or plumbing facilities). Furthermore, 72.5 percent of extremely low-income households paid more than 50 percent of their income toward housing costs, compared to 69.4 percent for all households.

## Resources for Extremely Low-Income Population and Residents Living Below the Poverty Line

The City Council and Banning Housing Authority Board ("Council") approved funding for housing programs on June 12th, 2018. The purpose of the programming is to encourage homeownership

and to preserve the existing housing supply. In order to remain in compliance with use of funding, the Council approved programs that primarily benefit low-income families (as defined by the California Department of Housing and Community Development). For example, a family of six with an annual income that does not exceed \$62,550, would potentially qualify.

Resources include the Mortgage Credit Certificate Program and other housing programs that benefit extremely low-income households. The Mortgage Credit Certificate (MCC) entitles qualified home buyers to reduce the amount of their federal income tax liability for an amount equal to 20% of the mortgage interest paid during the year on their primary mortgage loan. The advantages to the home buyer include:

- The home buyer's federal income tax liability is directly reduced by the amount of the tax credit;
- Home buyers can qualify more easily for their primary mortgage loan-lenders may factor in the tax credit when underwriting the loan application, which may allow the borrower to (i) qualify for a larger loan amount, or (ii) improve the borrower's qualifying debt ratios.

If the amount of the MCC exceeds the homebuyer's tax liability, the unused portion of the credit can be carried forward to the next three years or until used, whichever comes first. The Council approved funding for and directed staff to prepare program guidelines for the following programs:

- **Down Payment Assistance Program (DAP)** – provides 1% up to \$20,000 of purchase price toward down payment.
- **Energy Efficiency Rehabilitation Program (small)** – provides \$2,000 grant or \$5,000 forgivable loan toward energy efficiency and rehab costs (repairs most detrimental to health and safety addressed first).
- **Energy Efficiency and Minor Home Repair (big)** – Forgivable loan of up to \$10,000. Similar terms to loan option above.

Many extremely low-income households seek rental housing and may face an overpayment, overcrowding or substandard housing condition. Some extremely low-income households could have physical or mental disabilities and/or other special needs. To address the range of needs, the City will employ a program to remove constraints for, and support development of, housing types that may fit the needs of extremely low-income residents, such as single-room occupancy (SRO) units and supportive housing. Supportive housing is generally defined as permanent, affordable housing with on-site services that help residents transition into stable, more productive lives. Services may include childcare, after-school tutoring, career counseling, etc. Most transitional housing includes a supportive services component. The City regulates supportive housing as a residential use, provided supportive services are subordinate to the residential use. To address the housing needs of extremely low-income households, the City will identify and meet with nonprofit builders who specialize in building housing for extremely low-income households and supportive housing.

## 2.15 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 related activities on a generally year-round basis. When workload increases during harvest periods, the labor force is supplemented by seasonal labor, often supplied by a labor contractor. For

some crops, farms may employ migrant workers, defined as those whose travel distance to work prevents them from returning to their primary residence after their work ends for the day.

Due to the high cost of housing and low wages, a substantial number of migrant farm workers have difficulty finding affordable, safe, and sanitary housing. According to the State Employment Development Department, the average farm worker earned a mean annual income of \$32,000 in 2020. This limited income is exacerbated by a tenuous and/or seasonal employment status. Determining the true size of the agricultural labor force is difficult. For instance, the government agencies that track farm labor do not consistently define farmworkers (e.g. field laborers versus workers in processing plants), length of employment (e.g. permanent or seasonal), or place of work (e.g. the location of the business or field). The US Department of Agriculture's 2017 Census of Agriculture reported that in Riverside County, 11,365 persons were hired farm labor (fulltime), 5,758 persons were employed for 150 days or more, and 5,607 were hired for 150 days or less.<sup>1</sup> According to SCAG, it is estimated that 55 City residents were considered farmworkers (employed in farming, fishing, and forestry occupations).

## Resources for Farmworkers

The City can accommodate the development of farmworker housing in any zone that permits the type of housing being built (i.e., ranch/agriculture residential, ranch/agriculture residential hillside, rural residential, rural residential hillside, very low density residential, low density residential or group housing) without special conditions. Since the City does not have a large farmworker population, the housing needs of this group are addressed through the City's standard affordable housing programs for lower-income households.

## 2.16 Persons Experiencing Homeless

Results of Riverside County's January 2023 point-in-time count showed an increase in residents experiencing homelessness over the previous year and revealed that one in five unsheltered people were experiencing homelessness for the first time.<sup>2</sup> The top three primary factors contributing to homelessness include family disruption, lack of income, and unemployment. Banning had 90 persons in the 2023 point-in-time count, 40 unsheltered and 50 residing in shelters. Banning currently has several illegal homeless encampments that are creating public health and safety concerns for community members as well as those occupying the encampments.

State law (Section 65583(1) (6)) requires municipalities to 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), describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
- A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);

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<sup>1</sup> USDA 2017: [https://www.nass.usda.gov/Publications/AgCensus/2017/Full\\_Report/Volume\\_1,\\_Chapter\\_2\\_County\\_Level/California/](https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_2_County_Level/California/)

<sup>2</sup> <https://rivcohhpws.org/sites/g/files/aldnop131/files/2023-05/FINAL%202023%20PIT%20Infographic%20rev.pdf>

- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include persons living in substandard housing, (unless such housing has been officially condemned); persons living in overcrowded housing, persons discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge), or persons who may be at risk of homelessness (for example, living temporarily with family or friends.) The City of Banning, according to the City's Zoning Ordinance, allows group homes, including by inference, homeless shelters by Conditional Use Permit in the Business Park zone, HDR zone, and Mobile Home Park zone. Residential occupancy or single-room occupancy hotels (SROs) can also be an important component of the special needs housing picture due to the relatively lower cost of rent and are permitted in the HDR zone with approval of a conditional use permit.

As shown below in Table 14, there are 40 unsheltered persons in the City of Banning, less than two percent of the unsheltered population of Riverside County (unsheltered persons are persons who are unhoused and not residing at a shelter). This percent was higher than neighboring cities of Beaumont and Calimesa, but less than San Jacinto and Moreno Valley.

**Table 14 Unsheltered Persons in Banning and Surrounding Cities**

| Jurisdiction     | Unsheltered | Percent of Unsheltered Population in Riverside County |
|------------------|-------------|---|
| Banning          | 40          | 1.6   |
| Beaumont         | 33          | 1.4   |
| Calimesa         | 8           | 0.3   |
| San Jacinto      | 120         | 4.9   |
| Moreno Valley    | 77          | 3.2   |
| Riverside County | 2,441       | 100.0   |

Source: Riverside County Homeless Point in Time (PIT) Count, 2023

## Resources for Persons Experiencing Homelessness

H.E.L.P Inc., a local nonprofit organization, is the primary service provider for persons experiencing homelessness in Banning and works with the City to provide food and clothing assistance for qualifying individuals and families. Persons experiencing homelessness in Banning can access programs offered through the County of Riverside, including: the Emergency Food and Shelter Program, the Homeless Management information System, the Continuum of Care for Riverside County, and the Housing and Urban Development Supportive Housing Program.

The City received CDBG funding, filtered through the County of Riverside Economic Development Agency (EDA), to assist in funding the Ramsey Street Village emergency non-congregate shelter, which was destroyed in a fire in winter 2020. Fortunately, the City was able to receive reimbursement from insurance and additional CDBG funding for construction activities and anticipates rebuilding the shelter. Upon completion, it will meet the needs of the City's unsheltered population.



The City's Zoning Ordinance allows group homes by Conditional Use Permit in the Business Park Zone, HDR Zone, and Mobile Home Park Zone. Emergency shelters are processed in the same manner as other multiple-family projects.

Sub-populations of the homeless include those with mental disabilities and substance abuse problems, those suffering domestic violence, persons with AIDS, veterans, youth, the unemployed, and extremely low/very low-income families. Each of these sub-population groups has different needs including substance abuse recovery, mental treatment, medical treatment, and job training and placement. Table 15 identifies programs available to assist the homeless by sub-population.

**Table 15 Homeless Assistance Programs**

| Subpopulation                | Service Providers  |
|------------------------------|--|
| Elderly and Disabled         | Dial-A-Ride  |
| Alcohol/Drug Dependent Abuse | Critical Needs Hotline   |
| Domestic Violence            | RCCADV (Riverside County Center for Alternatives to Domestic Violence)<br>American Red Cross<br>Catholic Charities |
| Persons With AIDS/HIV        | Inland AIDS Project (Eastern County)<br>Desert AIDS Project (Western County)                                       |

Source: City of Banning 2020

The City recently amended the Zoning Ordinance to provide for the nondiscretionary siting of homeless shelters and to allow transitional and supportive housing facilities consistent with State law.

## 2.17 Housing Stock Characteristics

Consistent with an urbanized, largely built-out community, Banning experienced a moderate housing growth of 20.1 percent between 2000 and 2010 and slower growth of 9.2 percent between 2010 and 2018. As shown below in Table 16, Census data shows that the City's housing stock grew from 8,891 units in 2000 to 12,144 units in 2010, or a 38.4 percent increase over 10 years. However, the City's housing stock barely increased during the following decade. Overall, housing growth in Riverside County has continued to increase due to its relatively cheaper land prices than coastal areas and its proximity to nearby cities and major employers. Out of the total housing units in Banning, there were 11,044 occupied units in 2020, which equates to a 9.1 percent total vacancy rate (DOF 2021). The average household size (as expressed by the population to housing unit ratio) is 2.69 persons per household.

**Table 16 Housing Unit Growth (2000 to 2019)**

| Jurisdiction     | 2000    | 2010    | 2020 <sup>1</sup> | Percent Change |           |
|------------------|---------|---------|-------------------|----------------|-----------|
|                  |         |         |                   | 2000-2010      | 2010-2019 |
| Banning          | 8,891   | 12,144  | 12,156            | 38.6%          | 0.1%      |
| Beaumont         | 4,258   | 13,695  | 16,909            | 221.0%         | 23.5%     |
| Calimesa         | 3,248   | 3,853   | 4,269             | 18.6%          | 10.8%     |
| San Jacinto      | 9,476   | 14,791  | 15,944            | 56.1%          | 7.8%      |
| Moreno Valley    | 41,431  | 55,559  | 57,523            | 34.1%          | 3.5%      |
| Riverside County | 584,674 | 800,707 | 856,124           | 36.9%          | 6.9%      |

<sup>1</sup>City level data from the 2020 Census was unavailable at the time of this report, therefore DOF 2020 estimates were used.

Source: Bureau of the Census, 2000-2010; California Department of Finance (DOF) 2021.

### 2.17.1 Housing Type and Tenure

The City's housing stock in 2000, 2010, and 2020 by housing type is shown below in Table 17. Between 2010 and 2020, the number of single-family housing units increased by 0.1 percent, while the percentage of multi-family units increased approximately 0.4 percent.

The proportion of owner-occupied households in Banning slightly decreased between 2010 and 2020. In 2020, approximately 64.3 percent of the City's households were owner-occupants. In 2020, approximately 79.6 percent of the City's housing units were single-family homes. Between 2010 and 2020 the total vacancy rate in the City increased from 8.4 percent to 8.8 percent. Within this same timeframe, the 2015-2019 ACS reported homeowner and renter vacancy rates in Banning of 0.9 percent and 3.4 percent, respectively.

**Table 17 Housing Unit Type**

| Housing Unit Type <sup>1</sup> | 2000          |               | 2010          |               | 2020          |               | Percent Change |              |
|--------------------------------|---------------|---------------|---------------|---------------|---------------|---------------|----------------|--------------|
|                                | Units         | Percent       | Units         | Percent       | Units         | Percent       | 2000-2010      | 2010-2020    |
| Single-Family Homes            | 7,575         | 77.6%         | 9,669         | 79.6%         | 9,679         | 79.6%         | 27.6%          | 0.1%         |
| Multi-Family Homes             | 1,030         | 10.6%         | 1,336         | 11.0%         | 1,330         | 11.0%         | 29.7%          | 0.4%         |
| Mobile Homes/Other             | 1,156         | 11.8%         | 1,139         | 9.4%          | 1,147         | 9.4%          | 1.5%           | 0.7%         |
| <b>Total</b>                   | <b>9,761</b>  | <b>100.0%</b> | <b>12,144</b> | <b>100.0%</b> | <b>12,156</b> | <b>100.0%</b> | <b>24.4%</b>   | <b>0.1%</b>  |
| Owner-Occupied                 | 6,438         | 72.4%         | 7,868         | 73.9%         | 7,003         | 64.3%         | 22.2%          | -10.9%       |
| Renter-Occupied                | 2,453         | 27.6%         | 2,779         | 26.1%         | 3,882         | 35.6%         | 13.3%          | 38.7%        |
| <b>Total Occupied</b>          | <b>10,554</b> | <b>100.0%</b> | <b>11,739</b> | <b>100.0%</b> | <b>10,885</b> | <b>100.0%</b> | <b>11.2%</b>   | <b>-7.3%</b> |
| Vacancy Rate                   | —             | 8.6%          | —             | 8.4%          | —             | 8.8%          | -0.2%          | 0.4%         |

<sup>1</sup> Renter owner data was pulled from the ACS and 2008 Housing Element. Other data was from 2020 SCAG data.

Source: Bureau of the Census, 2000-2010. American Community Survey, 2015-2019; 2020 SCAG pre certified data

As shown below in Table 18, the total average household size of occupied units increased slightly from 2000 to 2010 and then remained consistent from 2010 to 2019. Average household size for owner-occupied households increased from 2.2 to 2.4 persons per unit between 2010 and 2019, while renter-occupied households also increased in average household size from 3.1 in 2010 to 3.3 in 2019.

**Table 18 Average Household Size (2000-2019)**

| Tenure          | 2000 | 2010 | 2019 |
|-----------------|------|------|------|
| Owner-Occupied  | –    | 2.2  | 2.4  |
| Renter-Occupied | –    | 3.1  | 3.3  |
| Total Occupied  | 2.6  | 2.7  | 2.7  |

Source: Bureau of the Census, 2000-2010. American Community Survey, 2015-2019

### Number of Bedrooms Per Unit

The 2015-2019 ACS identified the number of bedrooms per unit for all housing in Banning. As shown below in Table 19, housing units with five or more bedrooms comprised the majority of households in 2019 (67.1 percent). Thirty-two percent of housing had two, three, or four bedrooms per unit, while 0.9 percent had fewer than two bedrooms per unit.

**Table 19 Housing Unit Size**

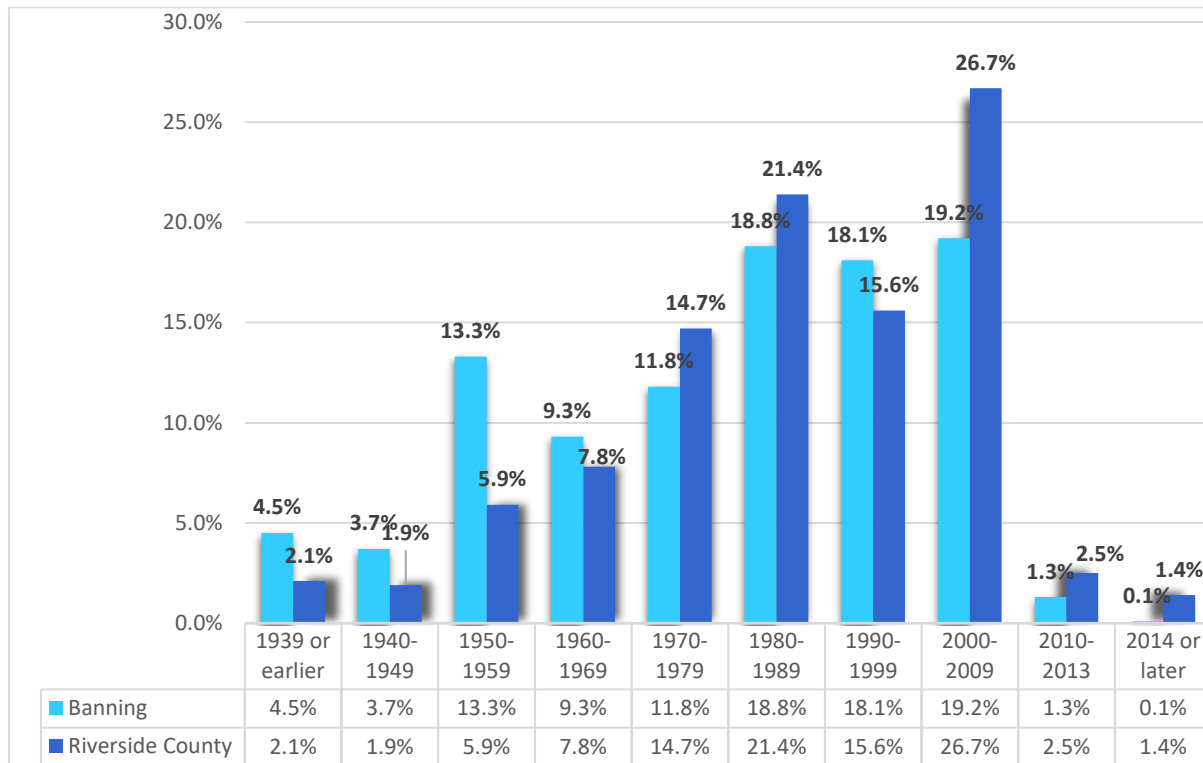
| Bedrooms           | Percent of Total |
|--------------------|------------------|
| 1 Bedroom          | 0.9%             |
| 2 Bedrooms         | 3.0%             |
| 3 Bedrooms         | 5.4%             |
| 4 Bedrooms         | 23.6%            |
| 5 or more bedrooms | 67.1%            |

Source: American Community Survey, 2015-2019.

### Age and Condition of Housing Stock

Housing age can be an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and State programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs. Three factors used to determine housing conditions are age of housing, overcrowding, and lack of plumbing/kitchen facilities. Overcrowding was previously addressed.

As shown below in Figure 4, as of 2018, approximately 61.4 percent of all housing units in Banning were built prior to 1990, potentially requiring minor repairs and modernization improvements. Approximately 56.1 percent of the City's housing stock was constructed between 1980 and 2009, an earlier housing boom than other areas in the County.

**Figure 4 Age of Housing Stock**

Source: American Community Survey, 2015-2019.

Housing that is not maintained can discourage reinvestment, depress neighboring property values, and can negatively impact the quality of life in a neighborhood. Improving housing is an important goal of the City. HUD considers housing units to be “standard units” if they are in compliance with local building codes. Any housing unit that includes conditions listed in Table 20 below, is considered substandard. Common housing code violations in Banning include problems with electrical wiring, plumbing, windows, roofs and exterior, and heating and air conditioning systems. Most of Banning’s substandard units are suitable for rehabilitation.

Table 20 below shows the number of substandard units in the City, including those that lack the availability of plumbing and kitchen facilities (percentages out of a total of 10,991 occupied housing units). Approximately 2.0 percent of all occupied units in the City are considered substandard units.

According to Banning Code Enforcement, 43 properties are investigated for substandard housing. The City received approximately 1,000 calls last year for housing code violations, equally distributed across the City.

**Table 20 Substandard Housing Units**

| Condition                            | Number of Occupied Units | Percentage of Total Occupied Units |
|--------------------------------------|--------------------------|------------------------------------|
| Lacking complete plumbing facilities | 56                       | 0.5%                               |
| Lacking complete kitchen facilities  | 161                      | 1.5%                               |
| Total occupied substandard units     | 217                      | 2.0%                               |

Source: Bureau of the Census, American Community Survey, 2015-2019.

## Housing Costs

Housing costs are indicative of housing accessibility to all economic segments of the community. Typically, if housing supply exceeds housing demand, housing costs will fall. If housing demand exceeds housing supply, housing costs will rise.

## Ownership Market

The City's median home price in 2020 was \$311,585, which was 27 percent lower than the countywide median of \$427,047. As shown below in Figure 5, Banning's median home price was lower than neighboring jurisdictions.

**Figure 5 Median Home Prices Sales (2021)**



Source: Zillow, 2021. County of Riverside data is from 2020.

As shown below in Table 21, median home sale prices in Banning increased by 18.3 percent between 2019 and 2020. Other Riverside County cities saw smaller increases in median home prices during this time period, as did Riverside County as a whole.

**Table 21 Changes in Median Home Sale Prices and Values (2019-2020)**

| Jurisdiction        | 2019 Price | 2020 Price | Percent Change in Median Sale Price |
|---------------------|------------|------------|-------------------------------------|
| Banning             | \$263,289  | \$311,585  | 18.3%                               |
| Beaumont            | \$351,000  | \$364,000  | 3.7%                                |
| Calimesa            | \$366,000  | \$381,000  | 4.1%                                |
| San Jacinto         | \$299,000  | \$311,000  | 4.0%                                |
| Moreno Valley       | \$344,000  | \$376,466  | 9.4%                                |
| County of Riverside | \$394,000  | \$427,047  | 8.4%                                |

Source: Zillow, 2020.

## Housing Rents

Rental listings posted on Zillow.com for available rental housing in Banning were reviewed between January 2020 to December 2020. Table 22 below lists the median and average rents for rental housing by number of bedrooms.

**Table 22 Average Monthly Rent**

| Number of Bedrooms | Median Rent <sup>1</sup> | Average Rent | Rent Range      |
|--------------------|--------------------------|--------------|-----------------|
| Studio             | –                        | \$495.00     | \$1,140-\$1,305 |
| 1 Bedroom          | \$800.00                 | \$800.00     | \$495-\$1,400   |
| 2 Bedroom          | \$1,538.00               | \$1,395.00   | \$428-\$1,305   |
| 3 Bedroom          | \$1,650.00               | \$1,650.00   | \$659-\$1,795   |
| 4 Bedroom          | \$2,045.00               | \$2,045.00   | \$845-\$2,045   |

Source: Zillow, 2021. <sup>1</sup>Median rent data from Zumper, 2021.

## Housing Affordability

Housing affordability can be inferred by comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. This information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment.

HUD conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, HCD developed income limits that can be used to determine the maximum price that could be affordable to households in the upper range of their respective income category. Households in the lower end of each category can afford less by comparison than those at the upper end. Table 23 below shows the maximum amount that a household can pay for housing each month without incurring a cost burden (overpayment).

**Table 23 Housing Affordability Matrix - Riverside County**

| Income Group                        | Annual<br>Income Limits | Affordable<br>Payment | Housing Costs |                            | Affordable Price |         |
|-------------------------------------|-------------------------|-----------------------|---------------|----------------------------|------------------|---------|
|                                     |                         |                       | Utilities     | Taxes/Insurance<br>(Owner) | Sale             | Rent    |
| Extremely Low-Income (0-30% of AMI) |                         |                       |               |                            |                  |         |
| 1-Person                            | \$15,850                | \$396                 | \$205         | \$139                      | \$13,823         | \$191   |
| 2-Person                            | \$18,100                | \$453                 | \$218         | \$158                      | \$20,902         | \$235   |
| 3-Person                            | \$21,720                | \$543                 | \$246         | \$190                      | \$28,186         | \$297   |
| 4-Person                            | \$26,200                | \$655                 | \$274         | \$229                      | \$39,993         | \$381   |
| 5-Person                            | \$30,680                | \$767                 | \$305         | \$268                      | \$50,980         | \$462   |
| Very Low-Income (31-50% of AMI)     |                         |                       |               |                            |                  |         |
| 1-Person                            | \$26,400                | \$660                 | \$205         | \$231                      | \$59,005         | \$455   |
| 2-Person                            | \$30,150                | \$754                 | \$218         | \$264                      | \$71,697         | \$536   |
| 3-Person                            | \$33,900                | \$848                 | \$246         | \$297                      | \$80,348         | \$602   |
| 4-Person                            | \$37,650                | \$941                 | \$274         | \$329                      | \$89,028         | \$667   |
| 5-Person                            | \$40,700                | \$1,018               | \$305         | \$356                      | \$93,891         | \$712   |
| Low-Income (51-80% of AMI)          |                         |                       |               |                            |                  |         |
| 1-Person                            | \$42,200                | \$1,005               | \$205         | \$369                      | \$126,669        | \$850   |
| 2-Person                            | \$48,200                | \$1,205               | \$218         | \$422                      | \$148,997        | \$987   |
| 3-Person                            | \$54,250                | \$1,356               | \$246         | \$475                      | \$167,499        | \$1,110 |
| 4-Person                            | \$60,250                | \$1,506               | \$274         | \$527                      | \$185,815        | \$1,232 |
| 5-Person                            | \$65,100                | \$1,628               | \$305         | \$570                      | \$198,386        | \$1,322 |
| Median Income (80-100% of AMI)      |                         |                       |               |                            |                  |         |
| 1-Person                            | \$52,700                | \$1,318               | \$205         | \$461                      | \$171,637        | \$1,112 |
| 2-Person                            | \$60,250                | \$1,506               | \$218         | \$527                      | \$200,603        | \$1,288 |
| 3-Person                            | \$67,750                | \$1,694               | \$246         | \$593                      | \$225,313        | \$1,448 |
| 4-Person                            | \$75,300                | \$1,883               | \$274         | \$659                      | \$250,268        | \$1,609 |
| 5-Person                            | \$81,300                | \$2,033               | \$305         | \$711                      | \$267,764        | \$1,727 |
| Moderate Income (100-120% of AMI)   |                         |                       |               |                            |                  |         |
| 1-Person                            | \$63,250                | \$1,581               | \$205         | \$553                      | \$216,818        | \$1,376 |
| 2-Person                            | \$72,300                | \$1,808               | \$218         | \$633                      | \$252,208        | \$1,590 |
| 3-Person                            | \$81,300                | \$2,033               | \$246         | \$711                      | \$283,342        | \$1,787 |
| 4-Person                            | \$90,350                | \$2,259               | \$274         | \$791                      | \$314,721        | \$1,985 |
| 5-Person                            | \$97,600                | \$2,440               | \$305         | \$854                      | \$337,570        | \$2,135 |

Sources: HCD, 2020. Veronica Tam and Associates, 2020.

## Extremely Low-Income Households

Extremely low-income households earn 30 percent or less of the County area median income – up to \$15,850 for a one-person household and up to \$30,680 for a five-person household in 2020. Extremely low-income households cannot afford market-rate rental or ownership housing in Banning without assuming a cost burden.

## **Very- Low-Income Households**

Very low-income households earn between 31 percent and 50 percent of the County area median income – up to \$26,400 for a one-person household and up to \$40,700 for a five-person household in 2019. A low-income household can generally afford homes offered at prices between \$59,005 and \$93,891, adjusting for household size. After deductions for utilities, a very low-income household can afford to pay approximately \$455 to \$712 in monthly rent, depending on household size. Given the cost of housing in Banning, very low-income households could not afford to purchase a home or rent an adequately sized unit in the City.

## **Low-Income Households**

Low-income households earn between 50 percent and 80 percent of the County area median income – up to \$42,200 for a one-person household and up to \$65,100 for a five-person household in 2020. A low-income household can generally afford homes offered at prices between \$126,669 and \$198,386, adjusting for household size. After deductions for utilities, a low-income household can afford to pay approximately \$850 to \$1,322 in monthly rent, depending on household size.

## **Median-Income Households**

Median-income households earn between 80 percent and 100 percent of the County's area median income - up to \$52,700 for a one-person household and up to \$81,300 for a five-person household in 2020. The affordable home price for a moderate-income household ranges from \$171,637 to \$267,764. After deductions for utilities, a one-person median-income household could afford to pay up to \$1,112 in rent per month and a five-person low-income household could afford to pay as much as \$1,727.

## **Moderate-Income Households**

Moderate-income households earn between 100 percent and 120 percent of the County's Area Median Income – up to \$97,600 depending on household size in 2020. The maximum affordable home price for a moderate-income household is \$216,818 for a one-person household and \$337,570 for a five-person family. Moderate-income households in Banning could afford to purchase the median priced home in the City; however, finding an affordable adequately sized home could present a challenge for households earning incomes at the lower end of the middle/upper category. The maximum affordable rent payment for moderate-income households is between \$1,376 and \$2,135 per month. Appropriately sized market-rate rental housing is generally affordable to households in this income group.

## **Cost Burden**

State and federal standards specify that a household overpays for housing costs if it spends more than 30 percent of gross income on housing. A household that spends more than it can afford for housing has less money available for other necessities and emergency expenditures. Lower income households overpaying for housing are more likely to be at risk of becoming homeless than other income groups. Typically, renter-households overpay for their housing costs more often than owner-households. Because renter-households tend to have lower income than homeowners, overpayment affects renter-households disproportionately.



Comprehensive Housing Affordability Strategy (CHAS) developed by the Census Bureau for HUD provides detailed information on housing needs by income level for different types of households at the city level. The CHAS developed by the Census Bureau for HUD provides detailed information on housing needs by income level for different types of households in Banning. Detailed CHAS data based on the 2013-2017 ACS data is displayed in Table 24 below. 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 burden, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

As depicted in Table 24, 72.5 percent of extremely low-income renter households spend more than 50 percent of their income on housing. Low-income households tend to more often be renters than buyers. Specifically, all extremely low, very low, and low-income renters in Banning reported experiencing at least one housing problem. Additionally, a higher than average portion of families who rent are housing-burdened (pay more than 30 percent of income on housing).

**Table 24 Housing Assistance Needs of Lower-Income Households**

| Household by Type, Income, and Housing Issue   | Number of Renters | Number of Homeowners | Total Households |
|--|-------------------|----------------------|------------------|
| <b>Extremely low-income (0-30% AMI)</b>        | <b>980</b>        | <b>785</b>           | <b>1,765</b>     |
| With any housing problem                       | 88.3%             | 82.8%                | 85.8%            |
| With cost burden >30%                          | 85.7%             | 82.1%                | 84.1%            |
| With cost burden > 50%                         | 72.5%             | 65.6%                | 69.4%            |
| <b>Very low-income (31-50% AMI)</b>            | <b>840</b>        | <b>975</b>           | <b>1,815</b>     |
| With any housing problem                       | 89.9%             | 67.7%                | 77.7%            |
| With cost burden >30%                          | 82.1%             | 65.6%                | 73.3%            |
| With cost burden > 50%                         | 32.7%             | 34.4%                | 33.6%            |
| <b>Low-income (51-80% AMI)</b>                 | <b>825</b>        | <b>1,550</b>         | <b>2,375</b>     |
| With any housing problem                       | 69.1%             | 40.7%                | 50.5%            |
| With cost burden >30%                          | 60.6%             | 37.1%                | 45.1%            |
| With cost burden > 50%                         | 5.5%              | 12.6%                | 10.1%            |
| <b>Moderate and above income (&gt;80% AMI)</b> | <b>1,290</b>      | <b>3,610</b>         | <b>4,900</b>     |
| With any housing problem                       | 23.3%             | 13.9%                | 16.3%            |
| With cost burden >30%                          | 16.7%             | 12.3%                | 13.5%            |
| With cost burden > 50%                         | 0.0%              | 1.4%                 | 1.0%             |
| <b>Total households</b>                        | <b>3,935</b>      | <b>6,925</b>         | <b>10,860</b>    |
| With any housing problem                       | 63.2%             | 35.1%                | 45.3%            |

Note: Data presented in this table are based on special tabulations from the ACS data. Due to the small sample size, the margins of errors can be significant. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD CHAS, 2013-2017.

## Assisted Housing at Risk of Conversion

State law requires the City to identify, analyze, and propose programs to preserve existing multi-family rental units that are currently restricted to low-income housing use and that will become unrestricted and possibly be lost as low income housing (i.e., “units at risk” or “at-risk units”). State law requires the following:

- An inventory of restricted low-income housing projects in the City and their potential for conversion;
- An analysis of the costs of preserving and/or replacing the units at risk and a comparison of these costs;
- An analysis of the organizational and financial resources available for preserving and/or replacing the units “at risk”; and
- Programs for preserving the at-risk units.

The following discussion satisfies the first three requirements of State law listed above pertaining to the potential conversion of assisted housing units into market rate housing before 2031. The Housing Plan section includes a program for preserving the at-risk units, which meets the final requirement of State law.

## Inventory of Assisted Housing Units in Banning

Table 25 provides a description of assisted housing developments in Banning. All multi-family rental units assisted under federal, state, and/or local programs, including HUD programs, state and local bond programs, redevelopment programs, density bonus, or direct assistance programs, are included in the table.

**Table 25 Assisted Housing Developments in Banning**

| Housing Complex             | Location                 | Total Units | Assisted Units |            |          |          | Total Assisted | Expiration Date | Funding            |
|-----------------------------|--------------------------|-------------|----------------|------------|----------|----------|----------------|-----------------|--------------------|
|                             |                          |             | Very Low       | Low        | Senior   | Moderate |                |                 |                    |
| Westview Terrace Apartments | 287 West Westward Avenue | 75          | 0              | 74         | –        | 0        | 74             | 2065            | HUD, LIHTC, CalHFA |
| Peppertree Apartments       | 426 E. Nicolet Street    | 81          | 0              | 80         | –        | 0        | 80             | 2058            | LIHTC              |
| Summit Ridge Apartments     | 555 N. Hathaway Street   | 81          | 0              | 80         | –        | 0        | 80             | 2058            | LIHTC              |
| <b>Total</b>                |                          | <b>237</b>  | <b>0</b>       | <b>234</b> | <b>–</b> | <b>0</b> | <b>234</b>     | <b>–</b>        | <b>–</b>           |

Source: City of Banning Redevelopment Agency, 2020; HUD Expiring Section 8 Database, 2020

## At-Risk Projects

The planning period for this at-risk housing analysis extends from 2021, through 2031. The underlying income use restrictions of these projects were reviewed for potential conversion to market rate during this planning period. Detailed project information is listed in Table 25. During

this 10-year period, no projects will be at risk of losing their affordability controls. No assisted units will be at risk between 2021 and 2031.

The three housing projects listed in Table 25 are assisted under the following programs:

**HUD Section 202 and HUD Section 8:** One of the projects was assisted under the Section 202 - Handicapped and Elderly Housing Program and the Section 8 program – Westview Terrace Apartments. Section 202 provides loans to help build or rehabilitate handicap or elderly units. The maximum period for the loan is 40 years. These HUD Section 202-financed projects also maintain project-based Section 8 contracts.

Under the HUD Section 8 program, participating building owners are entitled to receive HUD Fair Market Rents (FMRs) for their units with Section 8 contracts. On the Section 8 units, HUD makes up the difference between 30 percent of a household's monthly income and the FMRs.

**Low Income Housing Tax Credit (LIHTC):** Three projects received tax credit to construct low-income housing – Peppertree Apartments, Summit Ridge Apartments). The program offers tax incentive to develop affordable housing, such as very low and low income assisted units. A total of 234 non at-risk units are assisted under this program.

**CalHFA:** One project received funds from CalHFA to construct low/moderate income housing – Westview Terrace Apartments. CALHFA uses approved private lenders and purchases loans that meet CalHFA standards to support very low, low, and moderate income assisted units. A total of 74 non at-risk units are assisted under this program

## **Resources for Preservation of At-Risk Housing**

The following describes active non-profit agencies that may have the capacity to develop, acquire, and/or manage affordable housing, including housing projects that are at risk of converting to market-rate housing.

- **City of Banning Underwriting Program for Multi-Family Complexes:** The City currently has an underwriting program for multi-family and single-family affordable housing. Similar to an economic development incentive for a business attraction/expansion project, these agreements require a 55-year affordability covenant and City Council approval.
- **Western Community Housing:** Western Community Housing Inc. (WCH) is a California non-profit public benefit corporation that was founded in 1999 and is headquartered in Costa Mesa, California. WCH's mission is to promote affordable housing and to provide social services to low-income senior and family households. By partnering with local governments, for-profit developers, lenders, syndicators and corporate investors, WCH and its affiliates currently have an ownership interest in 89 affordable housing communities comprising over 7,800 units.
- **BRIDGE Housing:** In 1983, BRIDGE was formed from a major anonymous grant given to the San Francisco Foundation to spearhead new solutions to the worsening shortage of affordable housing. Today BRIDGE's steady stream of diverse development efforts and pipeline activity exceeds 18,000 homes.
- **LINC Housing:** LINC Housing has a 36-year history of creating communities for thousands of families and seniors throughout California. LINC is committed to building and preserving housing that is affordable, environmentally sustainable, and a catalyst for community improvement. The organization currently owns and operates Liberty Village in Beaumont.

## 3 Housing Constraints

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Constraints to the provision of adequate and affordable housing are effectuated by market, governmental, infrastructure, and environmental factors, among others. Such constraints may affect increase the purchase and/or rental cost of housing or may render residential construction economically infeasible. Constraints to housing production significantly impact households with lower and moderate incomes and special needs.

### 3.1 Market Constraints

#### Economic Factors

Southern California has experienced “boom and bust” cycles of housing development. The early 1990s, an economic depression dampened the real estate market in Southern California, which slowed housing construction despite relatively low interest rates. By the mid-1990s, the housing market began to turn around, and between 2000 and 2006, housing prices skyrocketed, rendering Southern California one of the most expensive areas in the nation. In the last decade, the economy has rebounded and mortgage rates have remained relatively low. As a result, the housing market has seen a gradual increase in home sales and has remained relatively stable. Furthermore, higher prices in coastal cities have encouraged people to invest and rent in cities closer to, and in, the Inland Empire. In Riverside County, the median home price in 2015 was \$318,000 compared to \$413,000 in 2020, an increase of approximately 30 percent in the last five years<sup>1</sup>. The Riverside County region has seen a steady increase in population, which has generated a greater demand for affordable and inclusive housing opportunities. Market forces on the economy and the subsequent effects on the construction industry may hinder the development of affordable housing.

#### Construction Cost

Construction costs depend on several factors, including type of construction, custom versus tract development, materials, site conditions, finishing details, amenities, size, and structural configuration. A major cost component of new housing is labor. Inflated labor costs due to high wage rates significantly increase the overall cost of housing in some markets. The cost of labor in Banning is relatively high for several reasons. Overall, the cost of living in Banning and neighboring cities is relatively high. Wage scales in places with unionized labor tend to be higher than in markets with non-unionized labor. According to the U.S. Bureau of Labor Statistics, construction workers earned a mean hourly wage of \$27.38 in 2020, six percent higher than the national average.<sup>3</sup> While no home building costs in the City of Banning were reported by homebuilders, ProMatcher Home Construction reported custom single-family home building costs between \$113.37 - \$168.33 per square foot for basic construction services in neighboring City of Moreno Valley.<sup>4</sup> Construction costs also differ by building core and shell components and parking requirements, particularly for multifamily housing. Gross residential square-footage cost estimates for Riverside County in 2019 were \$188.05 for apartments and \$200.84 for condominiums.<sup>5</sup>

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<sup>3</sup> [https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages\\_riverside.htm](https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages_riverside.htm)

<sup>4</sup> <https://home-builders.promatcher.com/cost/riverside-ca-home-builders-costs-prices.aspx>

<sup>5</sup> [https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR\\_CEFD\\_Multifamily\\_Housing\\_White-Paper\\_3\\_2020.pdf](https://ucreeconomicforecast.org/wp-content/uploads/2020/03/UCR_CEFD_Multifamily_Housing_White-Paper_3_2020.pdf)

## **Land Cost**

The cost of land depends on location, zoning, and availability of improvements. Additionally, land costs depend on the current use of the site, and whether the site is vacant or has an existing use that will need to be removed or converted prior to any redevelopment. In general, acquisition costs for entitled one-family (single-family subdivisions with infrastructure extension plans are higher than for raw land. Based on a review of undeveloped properties listed for sale in the City in January 2021, asking prices for vacant one-family lots ranged from \$29,000 to \$590,000 per acre. The cost of land in and near the City of Banning represents a significant portion of the cost of new construction, compared to previously developed areas of the City. Furthermore, as the City becomes increasingly built-out and future development becomes more reliant upon the acquisition of underutilized parcels and demolition of existing structures, the cost of a finished residential site will further increase.

## **Timing and Density**

On average, 81 percent of the maximum density was achieved for the 6 projects that are planned and approved to be built in the 2021-2029 planning period.

Generally, a period of four to six months can take place between discretionary approval and construction permit issuance (including review by the Planning Commission). The Community Development Director and staff will conduct a review of the submitted project. Applicants receive written notification, including date and time of the Development Plan Review meeting, approximately 21 business days after submitting a Development Plan Review. Approximately 20 business days after the review, the Community Development staff prepare and mail to the applicant a letter summarizing the requirements and staff's recommendations. If the project qualifies for the preparation of a Mitigated Negative Declaration (MND) under CEQA, staff generally needs 14 days to prepare the MND before the 20-day published public hearing notice for the project at the Planning and Housing Commission. That is approximately 34 days from when the Development Plan Review application is considered complete by City staff.

## **Condominium Conversions**

As the availability of land decreases and the cost of land increases, developers may pursue the conversion of rent-based, multi-family housing into individually sold condominium units. However, while condominium conversion facilitates more affordable homeownership than stand-alone houses, it may remove essential lower- and moderate-income rental housing. The City continues to seek the assistance of affordable housing developers to rehabilitate and preserve the long-term affordability of multi-family housing stock through density bonus incentives. Banning Municipal Code Ordinance 15.60.050 allows an applicant proposing conversion of existing rental apartments to condominiums to be eligible for a density bonus of 25 percent or other incentives of equivalent financial value, if the applicant agrees to provide at least 33 percent of the total units of the proposed condominium project to persons and families of low or moderate income, or at least 15 percent of the total units of the proposed condominium project to lower income households. This ordinance provides homeownership opportunities for low and moderate-income households.

## **Availability of Mortgage and Rehabilitation Financing**

The availability of financing affects a person's ability to purchase or improve a home. 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. The primary concern in a review of lending activity is to determine whether home financing is available to City residents. The data presented in this section include the disposition of loan applications submitted to financial institutions for home purchase, home improvement, and refinance loans in Banning.

In 2017, a total of 199 households applied for conventional home purchasing mortgage loans in Banning. As shown in Table 26, 109 (55 percent) of the conventional mortgage applications were approved, 14 (seven percent) were denied, and 76 (38 percent) were withdrawn or closed for incompleteness, or other circumstances. A total of 178 households applied to use government-backed loans to purchase homes in Banning.<sup>6</sup> The approval rate of government-backed loans (83 percent) was higher than the approval rate of conventional loans (55 percent).

Additionally, 436 Banning households applied for home refinancing loans in 2017. About 55 percent of these applications were approved and 17 percent were denied.

**Table 26 Disposition of Loan Applications**

| Applications         | Total | Approved (%) | Denied (%) | Other (%) |
|----------------------|-------|--------------|------------|-----------|
| <b>Home Purchase</b> |       |              |            |           |
| Conventional         | 199   | 109 (54.8)   | 14 (7.0)   | 76 (38.2) |
| FHA - Insured        | 150   | 122 (81.3)   | 7 (4.7)    | 2 (1.3)   |
| VA - Guaranteed      | 29    | 25 (86.2)    | 3 (10.3)   | 1 (3.4)   |
| <b>Refinancing</b>   |       |              |            |           |
| Conventional         | 259   | 147 (56.8)   | 38 (14.7)  | 74 (28.6) |
| FHA - Insured        | 110   | 59 (53.6)    | 18 (16.4)  | 33 (30.0) |
| VA - Guaranteed      | 67    | 33 (49.3)    | 17 (25.4)  | 17 (25.4) |

Notes:

“Approved” includes loans approved by the lenders whether or not they are accepted by the applicants.

“Other” includes loan applications that were either withdrawn or closed for incomplete information.

The data for loan apps was calculated from the 2017 HMDA data sheet for the State of California. Numbers are approximations.

FHA = Federal Housing Administration, VA = United States Department of Veterans Affairs

Source: CFPB, HMDA data, 2017.

As shown above in Table 26, there were relatively high rates of approval considering the low amount of applications that were denied for each category under home purchasing and refinancing. Given the high rates of approval, refinancing and home purchase loans are generally available and not considered to be a significant constraint in Banning. In order to assist low-income residents with homeownership opportunities, the City offers the Down Payment Assistance Program (DAP), which provides one percent or up to \$20,000 of purchase price toward down payment.

<sup>6</sup> Government-backed loans include loans insured or guaranteed by the Federal Housing Administration (FHA), Veteran Administration (VA), and Farm Service Agency (FSA)/Rural Housing Services (RHS). The City of Banning did not include data from the FSA/RHS.

## 3.2 Governmental Constraints

City policies and regulatory actions such as land use controls, site improvement requirements, building codes, fees, and the provision of affordable housing can impact the price and availability of housing. The following public policies can affect overall housing availability, adequacy, and affordability:

### Land Use Controls

The City regulates the type, location, density, and scale of residential development through its General Plan and Zoning Ordinance. Below discusses the City's zoning categories and their respective densities and design standards.

### Overview of General Plan, Zoning Categories, and Densities

Banning's land use controls have a direct impact on the provision of housing for all economic and social sectors of the community. There are various types of housing in the City including single-family dwellings, multi-family dwellings, townhomes, condominiums, mobile homes, and accessory dwelling units (ADUs). The Banning Community Development Element of the City's General Plan identifies the types of housing located in different portions of the City. Interstate 10 (I-10) bisects the City from west to east creating northern and southern halves. Larger residential lots, primarily used for agricultural purposes, are predominantly found south of I-10. Single-family residential and mixed-use residential/commercial developments have been primarily developed in the northern portion of the City. Residential densities in the City's General Plan land use categories are as follows:

- Ranch/Agriculture (1 unit/10 acre)
- Ranch/Agriculture – Hillside (1 unit/ 10 acre)
- Rural Residential (0-1 units/acre)
- Rural Residential – Hillside (0-1 units/acre)
- Very Low Density Residential (0-2 units/acre)
- Low Density Residential (0-5 units/acre)
- Medium Density Residential (0-10 units/acre)
- High Density Residential (11-18 units/acre)
- Mobile Home Park
- High Density Residential-20 Affordable Housing Opportunity (20-24 units/acre)
- Very High Density Residential (19-24 units/acre) (Under Program Number 6, a zoning text amendment will increase the density threshold to match HCD default density for lower income housing opportunities)

As shown in Table 27 below, the City's Zoning Ordinance implements the five residential land use designations and one mixed-use designation through various zoning districts. In addition to these general plan land use designations, the City also implements specific plans to establish land use policies. Specific plans, such as the Rancho San Geronio Specific Plan (RSG Specific Plan) (discussed below), have unique land use designations and zoning categories.

**Table 27 Land Use Designations and Zoning Districts**

| General Plan Designation                 | Zoning District          |
|--|--------------------------|
| Ranch/Agriculture Residential            | RA                       |
| Ranch/Agriculture Residential - Hillside | R/A/H                    |
| Rural Residential                        | RA, RA-H, RR, RR-H       |
| Rural Residential - Hillside             | RA, RA-H, RR, RR-H       |
| Very Low Density                         | VLDR                     |
| Low Density                              | VLDR, LDR,               |
| Medium Density                           | RR, RR-H, VLDR, LDR, MDR |
| High Density                             | HDR, VHDR                |
| Mobile Home Park                         | MHP                      |
| Downtown Commercial                      | DC                       |

RA = Rural Agriculture, RA-H = Rural Agriculture - Hillside, RR = Rural Residential, RR-H = Rural Residential - Hillside, VLDR = Very Low Density Residential, LDR = Low Density Residential, MDR = Medium Density Residential, HDR = High Density Residential, HDR-20(AHO) = High Density Residential (Affordable Housing Opportunities), MHP = Mobile Home Park, DC = Downtown Commercial

### Butterfield Specific Plan

The Butterfield Specific Plan is a 1,543-acre multi-use community within the northwestern corner of the City of Banning. Butterfield is to be predominately residential, comprised of simple, architecturally designed single-family, detached homes. Neighborhood parks, a public golf course, community parks, schools, open spaces, retail, and commercial parcels are also integrated into the community. The Butterfield Specific Plan proposes a variety of residential opportunities including small, medium, and standard lot single family detached homes; various configurations of single family detached cluster residences and attached single family or multi-family dwellings. Full construction is expected to occur over a 30-year period, with an estimated 180 dwelling units constructed per year.

The community character for Butterfield encompasses the elements of the rustic and natural beauty of the site's surrounding foothill environment. The community landscape concept combines the existing natural character of the site with the historic California ranch vernacular. The theme will be defined and implemented through architectural elements and materials such as stone walls, and other similar materials and finishes throughout the community. Butterfield's high-profile areas such as monumentation, parks, golf course clubhouse, and other community facilities will be highlighted and reinforce the California ranch theme.

### Rancho San Gorgonio Specific Plan

The Rancho San Gorgonio (RSG) Specific Plan is an 831-acre master planned residential community that overlays land in the City of Banning and in the City's sphere of influence. The RSG Specific Plan aims to fulfill the City of Banning's growth objectives by creating a development that responds to planning needs of the area, incorporates existing natural features and park amenities, and provides a variety of land uses. The Plan is organized into 44 planning areas (PAs) that include a variety of residential densities, lot types and housing types, common open spaces, an elementary school site, and a commercial area. Parks and paseos are incorporated throughout the community and buffer the converging existing creeks, while providing walking, riding and vehicle access throughout the community and connecting the RSG Specific Plan's distinct walkable "Village" neighborhoods.



The RSG Specific Plan supports a variety of residential opportunities including small, medium and larger lot single-family detached homes, various potential configurations of single-family detached cluster residences, and potential attached multi-family dwellings. The variety of residential uses provides housing at different affordable price levels. Through the use of a master plan, the RSG Specific Plan responds to the community's vision and objectives by providing a desirable high-quality planned community that integrates residential living areas and amenities throughout the RSG property. The mix of residential, commercial, open space and recreational opportunities provided by the RSG Specific Plan is organized and connected by the natural character of the land. The RSG Specific Plan's location within Banning, situated between the San Bernardino Mountains, including Mount San Gorgonio, and the San Jacinto Mountains, provides a human experience with design concepts that respond to the physical, social and emotional needs of its residents. Needed infrastructure improvements including roadways, drainage, and other improvements have been identified and sensitively incorporated into an urban design concept that celebrates open space and the public realm.

The RSG Specific Plan has four primary land use designations intended to establish the minimum acceptable design parameters. The development regulations contained in the RSG Specific Plan serve as the zoning regulations applicable to the Specific Plan area, in accordance with the City's Zoning Ordinance. The four land uses and the permitted types of housing found within each land use designation are listed below:

- **Very Low Density Residential:** Single Family Conventional Detached
- **Low Density Residential:** Single Family Conventional Detached, Single Family Alley-loaded Detached, Detached Cluster
- **Medium Density Residential:** Single Family Conventional Detached, Single Family Alley-loaded Detached, Detached Cluster, Duplex, Row Townhome, Attached Cluster
- **Medium High Density Residential:** Duplex, Row Townhome, Attached Cluster, Multi-family Flat

### 3.3 Residential Development Standards

#### Citywide Development Standards

The City regulates the type, location, density, and scale of development primarily through its Zoning Ordinance. Banning's residential development standards are shown below in Table 28. The City's minimum lot area and setback requirements are similar in comparison to other local jurisdictions. Lot coverage for these districts is determined by application of landscaping, open space, setback, and parking requirements.

**Table 28 Citywide Development Standards**

| Zoning | Min. Lot Area (Single Family) | Min. Lot Area (Multi-family) | Setback |        |        | Max. Height      | Max. Density (Net) | Min. Common Outdoor Space | Max. Building Cover (%) |
|--------|-------------------------------|------------------------------|---------|--------|--------|------------------|--------------------|---------------------------|-------------------------|
|        |                               |                              | Front   | Side   | Rear   |                  |                    |                           |                         |
| RA     | 10 acres                      | N/A                          | 50 ft.  | 25 ft. | 50 ft. | 2-story & 35 ft. | 1 du/10 acres      | N/A                       | 10                      |
| RA-H   | 10 acres                      | N/A                          | 50 ft.  | 25 ft. | 50 ft. | 2-story & 35 ft. | 1 du/ 10 acre      | N/A                       | 10                      |
| RR     | 40,000 sf                     | N/A                          | 50 ft.  | 25 ft. | 35 ft. | 2-story & 35 ft. | 0-1 du/acre        | N/A                       | 15                      |
| RR-H   | 40,000 sf                     | N/A                          | 50 ft.  | 25 ft. | 35 ft. | 2-story & 35 ft. | 0-1 du/acre        | N/A                       | 15                      |
| VLDR   | 20,000 sf                     | N/A                          | 35 ft.  | 15 ft. | 35 ft. | 2-story & 35 ft. | 0-2 du/acre        | N/A                       | 25                      |
| LDR    | 7,000 sf                      | 2 acres                      | 35 ft.  | 10 ft. | 35 ft. | 2-story & 35 ft. | 0-5 du/acre        | N/A                       | 40                      |
| MDR    | 7,000 sf                      | 2 acres                      | 15 ft.  | 5 ft.  | 10 ft. | 3-story & 45 ft. | 0-10 du/acre       | 200 sf                    | 40                      |
| HDR    | 7,000 sf                      | 7,000 sf                     | 15 ft.  | 5 ft.  | 10 ft. | 4-story & 60 ft. | 11-18 du/acre      | 200 sf                    | 40                      |
| MHP    | 9,000 sf                      | N/A                          | 10 ft.  | 5 ft.  | 10 ft. | 1-story & 25 ft. | 9-18 du/acre       | 200 sf                    | 50                      |

RA = Ranch Agricultural, RA-H = Ranch/Agriculture-Hillside, RR = Rural Residential, RR-H=Rural Residential-Hillside, VLDR = Very Low Density Residential, LDR = Low Density Residential, MDR = Medium Density Residential, HDR = High Density Residential, MHP = Mobile Home Park.

sq = square feet; ft. = feet; du = dwelling unit

Source: Banning, City of. 2020. Zoning Ordinance.

Table 29 shown below presents the City's parking requirements. For affordable housing development that meets the State Density Bonus law, State parking standards (0.5 parking spaces per unit) are used.

**Table 29 Citywide Parking Requirements**

| Housing Type        | Requirements   |
|---------------------|--|
| One-Family Dwelling | 2 spaces, 1 enclosed garage  |
| Apartment Dwelling  | Studio: 1 covered space; 1 guest space for every 4 units<br>1-bedroom: 1 covered space; 1 guest space for every 4 units<br>2-bedroom: 2 covered spaces, 1 guest space for every 4 units<br>3+ bedroom: 3 covered spaces, 1 guest space for every 4 units |
| Condominium         | 2 covered spaces with an enclosed garage, one uncovered guest off-street parking space for every 5 units   |

Source: Banning 2020. Zoning Ordinance.

## Rancho San Gorgonio Specific Plan Residential Development Standards

The City established different development standards for the RSG Specific Plan based on its four land uses. Residential development standards under each land use designation guide the aesthetic and functionality of development. The RSG Specific Plan development standards and parking requirements are shown below in Table 30 and Table 31.

**Table 30 Rancho San Gorgonio Specific Plan Development Standards**

| District                        | Setback (ft. from the street) |      |      | Max. Height (ft.) | Max. Density (Net)       | Min. Lot Area |
|---------------------------------|-------------------------------|------|------|-------------------|--------------------------|---------------|
|                                 | Front                         | Side | Rear |                   |                          |               |
| Very Low Density Residential    | 30                            | 20   | 15   | 35                | 0-2.5 du/ac              | 20,000 sf     |
| Low Density Residential         | 20                            | 10   | 15   | 35                | 2.6 du/ac<br>6 du/ac     | Variable      |
| Medium Density Residential      | 12                            | 10   | 10   | 35                | 6.1 du/ac<br>12 du/ac    | Variable      |
| Medium-High Density Residential | 10                            | 10   | 10   | 45                | 12.1 du/ac<br>18.0 du/ac | Variable      |

sq = square feet; ft. = feet; du = dwelling unit

Source: Banning, City of. 2020. Rancho San Gorgonio Specific Plan (RSGSP).

**Table 31 Rancho San Gorgonio Specific Plan Parking Requirements**

| Housing Type                    | Requirements  |
|---------------------------------|---|
| Very Low Density Residential    | 2 spaces per unit within a garage, guest parking provided on driveway or street   |
| Low Density Residential         | 2 spaces per unit within a garage, guest parking provided on driveway or street<br>2 spaces per unit within a garage, .33 guest spaces per unit (Applicable only to: Green Court Cluster, Motor Court Cluster, Stub Street Court Cluster)   |
| Medium Density Residential      | 2 spaces per unit within a garage; 1 space per unit within a garage for Age Qualified (AQ) uses, guest parking provided on driveway or street<br>2 spaces per unit within a garage; 1 spaces per unit within a garage for Age Qualified (AQ) uses, 33 guest spaces per unit (Applicable only to: Green Court Cluster, Motor Court Cluster, Stub Street Court Cluster, Duplex, Townhome, Attached Cluster) |
| Medium High Density Residential | 1 space per 1-bedroom unit; 2 spaces per 2 or more bedroom units (1 space must be within a garage or carport), 0.5 guest spaces per unit  |

Source: Banning, City of. 2020. Zoning Ordinance.

## 3.4 Housing for Persons with Special Needs

### 3.4.1 Provisions for a Variety of Housing Opportunities

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of types of housing for all income levels, including multi-family rental housing, mobile homes, emergency shelters, and transitional housing. While the above section on Land Use Controls addresses provisions for one-family and multi-family housing, this section describes the City's ability to accommodate other types of housing that may be suitable for, or supportive of, special needs populations. Table 32 summarizes the City's zoning provisions for multiple types of housing.

**Table 32 Provisions for a Variety of Housing Opportunities**

| Housing Types   | RA | RA-H | RR | RR-H | VLDR | LDR | MDR | HDR | MHP |
|---|----|------|----|------|------|-----|-----|-----|-----|
| One-family Dwellings                                  | P  | P    | P  | P    | P    | P   | P   | C   | X   |
| Multi-family Dwellings                                | X  | X    | X  | X    | X    | C   | P   | P   | X   |
| Condominiums/Townhomes                                | X  | X    | X  | X    | C    | C   | P   | P   | X   |
| Second Unit (ADU)                                     | P  | P    | P  | P    | P    | P   | P   | P   | X   |
| Mobile Home Parks                                     | X  | X    | X  | X    | X    | X   | C   | C   | P   |
| Licensed Residential Care Home (6 or fewer persons)   | P  | P    | P  | P    | P    | P   | P   | P   | P   |
| Licensed Residential Care Home (more than 6 persons)* | X  | X    | X  | X    | X    | X   | C   | C   | X   |
| Transitional Housing                                  | –  | –    | –  | –    | –    | –   | –   | –   | –   |
| Supportive Housing                                    | –  | –    | –  | –    | –    | –   | –   | –   | –   |
| Single Room Occupancy Units                           | X  | X    | X  | X    | X    | X   | X   | C   | X   |
| Emergency Shelters                                    | –  | –    | –  | –    | –    | –   | –   | –   | –   |

Banning, City of. 2020. Zoning Ordinance.

RA = Ranch Agricultural, RA-H = Ranch/Agriculture-Hillside, RR = Rural Residential, RR-H=Rural Residential-Hillside, VLDR = Very Low Density Residential, LDR = Low Density Residential, MDR = Medium Density Residential, HDR = High Density Residential, MHP = Mobile Home Park.

## One-family Residential

A one-family dwelling (known as single-family dwelling) means a detached building or qualifying manufactured home, set on permanent foundation and provided such housing unit is architecturally compatible with other housing units in the surrounding neighborhood as well as used exclusively for occupancy by one family, including necessary domestic employees of such family, and containing one dwelling unit. One-family residences are permitted in all residential zones in the City with the exception of the Mobile Home Park (MHP) zone. Per Section 17.08.120 of the City of Banning's Municipal Code, "mobile or manufactured homes which are used as single family residences shall be installed on an approved permanent foundation system in compliance with all applicable codes."

## Multi-family Residential

Multi-family housing is permitted in the City's MDR and HDR zones and conditionally permitted in the LDR zone. Multi-family residential development requires a site development plan. Projects at or above the 10-unit threshold require security management plans for review and approval. The LDR zone requires a CUP for multi-family projects containing 10 or more units. The CUP process takes four to six months. Section 17.08.140 of the City's zoning code includes the following findings:

- A. All multi-family developments with more than ten units shall provide thirty percent useable open space for active and passive recreational uses. Useable open space areas may not include: rights-of-way; vehicle parking areas; areas adjacent to or between any structures less than fifteen feet apart; setbacks; detention basins or any use whose primary purpose is not intended for recreation; patio or private yards; or areas with a slope greater than eight percent.
- B. Every dwelling unit shall have a patio or balcony not less than three hundred square feet in area or twenty-five percent of the dwelling unit size, whichever is less.

- C. All multi-family developments shall provide recreational amenities within the site such as a: swimming pool; spa; clubhouse; tot lot with play equipment; court game facilities for tennis, basketball or racquetball; improved softball or baseball fields; or day care facilities. The type of amenities shall be approved by the community development director.
- D. Off-street parking spaces for multi-family residential developments shall be located within one hundred fifty feet from the front or rear door of the dwelling for which is parking space is designated.
- E. Each dwelling unit shall be provided at least one hundred fifty cubic feet of private enclosed storage space within the garage, carport, or immediately adjacent to the dwelling unit.
- F. Driveway approaches within multi-family developments of more than ten units shall be delineated with interlocking pavers, rough textured concrete, or stamped concrete and landscaped medians.
- G. Common laundry facilities of sufficient number and accessibility consistent with the number of living units and the uniform building code shall be provided.
- H. Every dwelling unit shall be plumbed and wired for a washing machine and a dryer.
- I. For multi-family developments of over ten units, security and management plans shall be submitted for review and approval.

The findings for the CUP are objective in nature and do not pose an undue constrain on development.

### **Mobile Homes/Manufactured Housing**

The City has a specific zone for mobile homes as a means of establishing, maintaining and protecting mobile home rental parks in its jurisdiction. This zone designation provides added protection for tenants from unmitigated displacement due to change in use, including approval of a phase-out plan as a condition of rezoning an existing mobile home park. Mobile homes, along with manufactured housing, need to be permitted in the same fashion as other types of housing in the same zone. Currently, manufactured homes, which include mobile homes subject to the National Manufactured Housing Construction and Safety Act of 1974, are allowed in the MHP zoning designation by right and in the MDR and HDR zoning designations with a conditional use permit.

### **Accessory Dwelling Units**

Accessory Dwelling Units (ADUs), also referred to as second units, are permitted on a lot zoned for one-family and multi-family uses with the exception of the MHP zone. The City may ministerially approve a building permit application within a residential or mixed-use zone to create any of the following:

1. One ADU or junior ADU per lot with a proposed or existing single-family dwelling if all of the following apply:
  - a. The ADU or junior ADU is within the proposed space of a single-family dwelling or existing space of a single-family dwelling or accessory structure and may include an expansion of not more than one hundred fifty square feet beyond the same physical dimensions as the existing accessory structure. An expansion beyond the physical dimensions of the existing accessory structure shall be limited to accommodating ingress and egress. For purposes of this section, the term "accessory structure" shall mean a structure that is accessory and incidental to a dwelling located on the same lot.

- b. The space has exterior access from the proposed or existing single-family dwelling.
  - c. The side and rear setbacks are sufficient for fire and safety.
  - d. The junior ADU complies with the requirements of Subsection (F) and Government Code Section 65852.22.
2. One detached, new construction, ADU that does not exceed eight hundred square feet or sixteen feet in height and has at least four-foot side and rear yard setbacks on a lot with a proposed or existing single-family dwelling. The ADU may be combined with a junior ADU described in Subsection (D)(1) of the Zoning Ordinance.
  3. At least one ADU within the portions of existing multi-family dwelling structures that are not used as livable space, including, but not limited to, storage rooms, boiler rooms, passageways, attics, basements, or garages, if each unit complies with state building standards for dwellings. The applicant may request, and the City shall allow the number of ADU's that equal up to twenty-five percent of the number of multi-family dwelling units in the existing building.
  4. Not more than two detached ADU's that are located on a lot that has an existing multi-family dwelling so long as the units do not exceed a height of sixteen feet and have at least four-foot rear and side yard setbacks.

The passage of SB 1069 and AB 2299 in 2016, SB 229 and AB 494 in 2017, as well as SB 13 and ABs 68, 587, 670, 671, and 881 in 2019, made it necessary for Banning to revise its provisions related to the construction of ADUs and requirements for parking spaces to be consistent with State law. AB 68 allows an ADU and a junior ADU to be built on a single-family lot if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, prohibits fees on units of less than 750 square feet, and permits ADUs at existing multi-family developments.

The City is not currently compliant with AB 68 as AB 68 has removed the owner occupancy requirement. Based on Chapter 17.08.100 of the City's municipal code, owner-occupancy is currently required in the single-family residence in which the junior accessory dwelling unit will be permitted.

## Agricultural Workers

According to the Southern California Association of Governments (SCAG) in 2020, 102 people were employed in the agriculture, forestry, fishing, and mining industry within the City. The City's Ranch/Agricultural (RA) zone and Ranch/Agricultural-Hillside (RA-H) permit one dwelling unit per 10 acres. Additionally, activities such as agricultural and ranching activities, animal keeping (both personal and commercial use), and animal-keeping or agricultural related commercial enterprises, such as feed stores, commercial stables and similar uses are permitted in these zones.

The City permits agricultural employee housing to be permitted by-right, without a conditional use permit (CUP) in single-family zones for six or fewer persons and in agricultural zones with no more than 12 units or 36 beds. In accordance with State legislation, the City's zoning code will need to be revised to allow farmworker housing for 36 beds or 12 units in the RA and RA-H zones.

## Employee Housing

Title 25, California Code of Regulations, Division 1, Chapter 1, Subchapter 3 includes specific requirements for the construction of housing, maintenance of grounds and buildings, minimum allowable sleeping space and facilities, sanitation, and heating for employee housing. The provisions

of the California Building Standards Code (Title 24) govern the construction of permanent buildings used for employee housing. The construction of mobilehome and recreational vehicle lots within an employee housing facility is subject to provisions in the Mobilehome Parks Act and regulations adopted by HCD for such facilities.

Buildings used for human habitation, and buildings accessory thereto, within employee housing shall comply with the building standards published in the State Building Standards Code relating to employee housing and with the other regulations adopted pursuant to this part, unless a local ordinance prescribing minimum standards adopted in accordance with Sections 17958.5 and 17958.7 which is equal to such regulations is applicable. Notwithstanding the provisions of Section 17050, if such a local ordinance is applicable to buildings used for human habitation, and buildings accessory thereto, within employee housing, these buildings shall comply with the construction and erection provisions of the ordinance. Every person operating employee housing shall obtain a permit to operate that employee housing from the enforcement agency, unless otherwise exempted by this part. It shall be unlawful for any person to operate employee housing without a valid permit to operate issued by the enforcement agency, as required by this part. Permits to operate shall be issued annually by the enforcement agency, except as provided in this section and Section 17030.5. The City is not in compliance with the Employee Housing Act and will amend its zoning. Under Program 9, the City will review the Employee Housing Act provisions to comply with recent changes to State law and amend the zoning ordinance and other documents as necessary to comply.

## **Emergency Shelters**

According to the 2020 point in time count, there were 43 unsheltered persons in the City of Banning (RCHI 2021). The City's Zoning Ordinance defines "emergency shelter" as housing with minimal supportive services for homeless persons that limits occupancy to six months or less and that does not deny emergency shelter due to a person's inability to pay. Sufficient capacity was provided by the City in its Ramsey Street Village emergency non-congregate shelter. The shelter, however, was ruined in a fire in December 2020. The City has received an insurance reimbursement from the fire, secured additional CDBG funding for construction activities, and is awaiting an anticipated ESG-CVII grant at the Riverside County Board of Supervisors meeting in June of 2021. Therefore, the City anticipates being able to meet the needs of the City's unsheltered persons population in this emergency, transitional setting after the shelter's reconstruction.

The City permits "emergency shelters" in the Airport Industrial (AI) zone. Under the City's Zoning Ordinance, an emergency shelter must comply with the following:

1. Maximum of twenty-five beds;
2. Maximum separation of three hundred feet between emergency shelters;
3. 1.0 space per staff member of largest shift, plus 1.0 space per 12 beds and 2.0 guest spaces
4. Management and operations plan required specifying hours of operation, staffing levels and training procedures, maximum length of stay, size and location of exterior and interior on-site waiting and intake areas, admittance and discharge procedures, provisions for on-site or off-site supportive services, house rules regarding use of alcohol and drugs, on-site and off-site security procedures, and protocols for communications with local law enforcement agencies and surrounding property owners.

Land uses in the AI zone must be focused on airport-related and transportation-related functions, including machining, manufacturing, warehousing, flight schools, restaurants and office uses. Aircraft maintenance, repair and catering services are also appropriate; and mixed-use projects may also be permitted but are subject to a conditional use permit. Based on the City's current General Plan, there are approximately 420 acres of land zoned as AI. Existing uses in the AI zone include warehouses, storage units, and automobile-related businesses. The AI zone requires a minimum lot size of five acres, allows a maximum building coverage of 75 percent, and is not located in proximity to public transit services, food establishments, or services.

The City currently permits "homeless shelters" in the High Density Residential (HDR) and Mobile Home Park (MHP) zones with a conditional use permit but does not provide a definition of a "homeless shelter" in its Zoning Code.

The City's emergency shelter requirements and conditions are currently not in compliance with state law and will need to be amended. In 2019, AB 101 was passed requiring that a Low Barrier Navigation Center development be a use by right in mixed-use zones and non-residential zones permitting multi-family uses. The City will need to amend its Zoning Ordinance to explicitly address and allow the development of Low-Barrier Navigation Centers, by right, in residential and mixed-use zones, as well as nonresidential zones permitting multi-family uses. The need to amend the City's Zoning Ordinance to allow the development of Low-Barrier Navigation Centers by right in residential and mixed-use zones, is identified as a constraint.

Additionally, AB 139 was passed in 2019, establishing new criteria for evaluating the needs of the unsheltered population. The analysis must assess the capacity to accommodate the most recent unsheltered point-in-time count by comparing that to the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. AB 139 also established new parking standards for emergency shelters based on the number of staff rather than beds, and the standard that emergency shelters must have a separation of no more or up to 300 feet. The Zoning Ordinance is currently compliant with the parking standards and emergency shelter standards established by AB 139.

AB 2339, passed in 2022 and in effect as of January 1, 2023, requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit must allow residential uses. This could include zones that allow mixed uses that permit residential.

To fulfill this requirement, jurisdictions must identify sites in zoning designations where emergency shelters are allowed that meet at least one of the following criteria:

- Vacant and zoned for residential use.
- Vacant and zoned for nonresidential use and located near amenities and services for homeless individuals.
- Nonvacant and is suitable for use as a shelter in the current planning period.

Additionally, identified sites must have a minimum area of 200 square feet per person to show that it may accommodate the number of people experiencing homelessness.

The 2023 Point-in-Time Count found 90 people experiencing homelessness in City of Banning. AB 2339 requires a minimum of 200 square feet per person. In Banning, at least 18,000 square feet of nonresidential zoned vacant parcels are required for the number of people experiencing



homelessness. Currently, Banning permits emergency shelters by-right in the AI zone which allows mixed use residential/commercial developments with a CUP. Within the AI zone, there are vacant parcels within half a mile of a bus stop and/or near other amenities such as health care centers. The most suitable parcels for emergency shelters are a maximum of one acre. There are four such parcels in the AI zone that can accommodate 98 people with the maximum capacity limit of 25 beds for each site. Therefore, the City of Banning meets its obligation under AB 2339.

**Table 33 Vacant Parcels in the AI Zone for Emergency Shelters**

| APN          | Acreage     | Number of Beds |
|--------------|-------------|----------------|
| 532150005    | 0.11        | 23             |
| 541280037    | 0.86        | 25             |
| 541280026    | 0.13        | 25             |
| 541290019    | 0.69        | 25             |
| <b>Total</b> | <b>1.79</b> | <b>98</b>      |

## Transitional and Supportive Housing

The Zoning Ordinance defines “transitional housing” as a type of state-licensed residential care facility in which six or fewer individuals with a disability reside.

Transitional housing is a use that is permitted by right in all residential zones and is subject to the same regulations and procedures that apply to other residential uses. Given the City’s definition as a small residential care facility, transitional housing is permitted in all residential zones. Proposed transitional housing projects will be subject to the same development standards that apply to each zone.

Soroptimist House of Hope is a Residential Facility that offers treatment for women with Substance Addiction. The facility has a total of 5 beds and includes sober living homes, inpatient and aftercare support. Soroptimist House of Hope mission is to provide a safe, nurturing environment that helps patients to gain life skills in order to achieve a successful recover from their substance addiction and become productive members of the community. The facility’s programs allow clients to learn about recovery and themselves.

Pursuant to the Zoning Ordinance, “supportive housing” means housing occupied by a specified target population defined in Section 50675.14 of the California Health and Safety Code. There is no limit on length of stay, and the housing is linked to onsite or offsite services that assist residents in retaining supportive housing, improving his or her health status, improving independence, and – when possible – gain or maintain employment. Services may include childcare, after-school tutoring, career counseling, etc. Most transitional housing includes a supportive services component. The City regulates supportive housing as a residential use, provided supportive services are subordinate to the residential use. Supportive housing is a residential use subject to the same regulations and procedures that apply to other residential uses of the same type in the same zone.

Adopted in 2018, Assembly Bill 2162 (AB 2162) was passed which requires that supportive housing be a use by right in zones where multi-family and mixed uses are permitted including nonresidential zones permitting multifamily uses. Additionally, AB 2162 prohibits local governments from imposing any minimum parking requirements for units occupied by supportive housing residents if the development is located within ½ mile of a public transit stop.

The City is currently not in compliance with AB 2162 and will amend its Zoning Ordinance under Program 9 to address new provisions in regard to allowing low-barrier navigation centers in residential and nonresidential zoned areas and streamlining the approval process for emergency shelters, transitional housing, supportive housing, and single-room occupancy housing. To encourage and facilitate housing for persons with disabilities, as appropriate, reduced parking may be granted.

## Residential Care Homes

The Banning Zoning Ordinance defines “Residential Care Facility” as a building or group of buildings that provide temporary or permanent housing to children or individuals with a disability, as defined by State or federal law, where the residents do not live together as a single housekeeping unit, and where all facility residents (excluding the operator of the facility, the operator's family, and the facility's staff) are a child or adult with a disability. A residential care facility is not considered a boarding house.

The City does not regulate residential care facility for six or fewer persons per the Lanterman Developmental Disabilities Services Act (California Welfare Institution Code), which requires that State-licensed residential care facilities serving six or fewer persons be treated as a regular residential use. Thus, residential care facilities for six or fewer persons must be permitted by right in all residential zones, as currently allowed in the City’s Zoning Ordinance. Development requirements are established to provide guidance for the development of such facilities. No other special development or parking standards are established. The City regulates parking and other development standards based on land use/type of construction. The City’s Zoning Ordinance states the use shall not be located within 300 feet, measured from the property lines, of any other boarding house, single room occupancy, large residential care facility or small, unlicensed residential care facility, or within three hundred feet of any elementary or secondary school, or any daycare center. This requirement complies with State law and is therefore not considered an impediment. Program 9 will continue to monitor the most recent housing legislature regarding residential care facilities to remain compliant.

As stated in the Zoning Ordinance, “any person who seeks to operate a residential care facility in a zone where such use is not permitted, either by right or subject to conditional use permit pursuant to Sections 17.08.020 and 17.12.020 of the Zoning Ordinance, may request that the city allow the residential care facility to locate in such a zone as a reasonable accommodation under the federal Fair Housing Act by applying for a conditional use permit.” Furthermore, the reviewing authority must approve a request for accommodation if all of the following findings can be made:

1. The request for a reasonable accommodation will not impose an undue burden or expense on the city; and
2. The proposed use will not create a fundamental alteration in the city's zoning scheme. The factors that shall be considered in making this determination include, but are not limited to, the following:
  - a. Whether the proposed use is in accord with the operational standards identified in subsection B of the Zoning Ordinance;
  - b. Whether the proposed location of the use is in accord with the requirements of the zone in which the site is located and complies with other relevant city regulations, policies, and guidelines;

- c. Whether the proposed location of the use and the conditions under which it will be operated and maintained will not be detrimental to the public health, safety or welfare, or to existing land uses, the operation of established sensitive land uses as defined in this chapter, the character of established neighborhood, or planned residential development in the vicinity;
- d. Whether the proposed use is consistent with the General Plan;
- e. Whether the type, intensity, sensitivity, and operating characteristics of the proposed use, and the manner in which it is located on its site, are compatible with existing land uses, the character of established neighborhoods, or planned residential development in the vicinity; and
- f. Whether the site is physically suitable for the type, sensitivity, and intensity of the use as proposed, including access, utilities and absence of physical constraints.

Some text of these findings may be subjective, such as “the character of established neighborhood,” and may constrain development of residential care facilities. Program 9 will amend the Zoning Ordinance by October 2023 to remove subjective text seen as a constraint to the development of residential care facilities.

## **Single Room Occupancy (SRO)**

The Banning Zoning Ordinance defines SRO as a building or group of buildings with one or more guest rooms without kitchen and/or sanitary facilities in individual guest rooms, and which is also the primary residence of the guests. SRO buildings are currently permitted in the HDR zone with a conditional use permit. The requirement of a conditional use permit is identified as a potential constraint to the development of SROs. Program 9 will remove the conditional use permit requirement for SRO development.

## **Housing for Persons with Disabilities**

Banning, like other cities, has a specific demand and need for housing for persons with disabilities. Persons with disabilities have a wide range of housing needs which vary depending on severity and level of accessibility needed. Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one’s mobility, or make it difficult to care for oneself. The City strives to create “barrier-free” housing, making housing more accessible to critical services and transit. Banning has several guidelines that it follows, such as the Federal Fair Housing Act and the California Building Code, to increase accessibility and safety in housing developments.

## **Definition of Family**

Local jurisdictions may restrict access to housing for households that do not meet the jurisdiction’s respective definition for “family.” A restrictive definition of “family” that limits the number of individuals living together may illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated. The City of Banning Zoning Ordinance defines “family” as a single housekeeping unit.

## **Reasonable Accommodation Procedures**

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e. modifications or exceptions) in their zoning

laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that a paved path of travel can be provided to residents who have mobility impairments.

Reasonable accommodation procedures are codified in the City's Zoning Ordinance as detailed below.

#### 17.42.040 - Requesting reasonable accommodation.

- A. In order to make specific housing available to an individual with a disability, a disabled person or representative may request reasonable accommodation, pursuant to this chapter, relating to the application of various land use, zoning, or building laws, rules, policies, practices and/or procedures of the city.
- B. If an individual or representative needs assistance in making a request for reasonable accommodation, or appealing a determination regarding reasonable accommodation, the department will endeavor to provide the assistance necessary to ensure that the process is accessible to the applicant or representative. The applicant may be represented at all stages of the proceeding by a person designated by the applicant as his or her representative.
- C. A request for reasonable accommodation in laws, rules, policies, practices and/or procedures must be filed on an application form provided by the department, shall be signed by the owner of the property and submitted to the director, and shall include the following information:
  1. The name, address and telephone number of the applicant;
  2. The name, address and telephone number of the individual with a disability for whom the reasonable accommodation is being requested;
  3. The name, address, and telephone number of the owner of the property for which the reasonable accommodation request is being made. If the applicant is someone other than the property owner, a letter of agency or authorization signed by the property owner consenting to the application being made is required;
  4. The address and current use of the property for which the reasonable accommodation request is being made;
  5. A description of how the subject property will be used by the disabled individual(s);
  6. A description of the reasonable accommodation request and the specific land use, zoning or building standard, regulation, policy or procedure to be modified or waived;
  7. The basis for the claim that the Fair Housing Laws applies to the individual(s) and evidence satisfactory to the city supporting the claim, which may include a letter from a medical doctor or other licensed health care professional, a handicapped license, or other appropriate evidence which establishes that the individual(s) needing the reasonable accommodation is disabled/handicapped pursuant to the Fair Housing Laws;
  8. The specific reason the requested accommodation is necessary to make the particular housing unit reasonably accessible and available to the disabled individual(s);
  9. Verification by the applicant that the property is the primary residence of the person for whom reasonable accommodation is requested; and
  10. A filing fee in an amount as determined from time to time by resolution of the city council, but not to exceed the reasonable estimated costs to the city in processing the application.

17.42.050 - Decision on application.

- A. The director may approve, conditionally approve, or deny an application for a reasonable accommodation for an existing use or a proposed new use that only requires a ministerial permit or approval. The director shall issue a written determination within thirty days of the date of receipt of a completed application. The director may:
1. Grant the accommodation request in full,
  2. Grant the accommodation request subject to specified nondiscriminatory conditions that are consistent with the requested reasonable accommodation, or
  3. Deny the request.

Notice of the director's determination shall be mailed first class to the applicant and adjacent property owners within three hundred feet of the project boundary. The notice of the director's decision shall state the facts and evidence upon which the director's decision was based in connection with the findings stated in section 17.42.060.

- A. If the project for which the request for a reasonable accommodation is made requires a discretionary permit or approval, then the application for a reasonable accommodation will be heard at the same time as, and in conjunction with, the applicable discretionary permit or approval. The planning commission shall consider an application at the next reasonably available regular planning commission meeting that occurs after the application for reasonable accommodation is complete. The application for reasonable accommodation shall be heard as a public hearing item. At the conclusion of the public hearing and determination thereon by the planning commission, the director shall issue a written statement of the planning commission's determination within thirty days. The planning commission may:
1. Grant the accommodation request,
  2. Grant the accommodation request subject to specified nondiscriminatory conditions that are consistent with the requested reasonable accommodation, or
  3. Deny the request.

Notice of the planning commission's determination (which may be in the form of a resolution adopted by the commission) shall be mailed first class to the applicant and adjacent property owners within three hundred feet of the project boundary. The notice of the planning commission's decision shall state the facts and evidence upon which the commission's decision was based in connection with the findings stated in section 17.42.060.

- A. If necessary to reach a determination on any request for reasonable accommodation, the director may request further information from the applicant after the applicant has submitted its initial application. Such request for additional information shall:
1. Be consistent with this chapter; and
  2. Specify in detail what information is required; and
  3. Request additional information only to the extent such information is reasonably necessary to render the findings required by this chapter.

In the event that a request for further information is made, the application will not be deemed "complete" until the applicant reasonably responds to the request with responsive information.

- A. A reasonable accommodation that is granted pursuant to this chapter shall not require the approval of any variance as to the reasonable accommodation.

(Ord. No. 1462, § 2, 3-12-13)

17.42.060 - Required findings.

The following findings must be made in order to approve any request for reasonable accommodation:

- A. The housing, which is the subject of the request for reasonable accommodation, will be occupied as the primary residence by an individual protected under the fair housing laws.
- B. The request for reasonable accommodation is necessary to make specific housing available to one or more disabled individuals protected under the Fair Housing Laws.
- C. The requested reasonable accommodation will not impose an undue financial or administrative burden on the city. "Undue financial or administrative burden" is defined in the Fair Housing Laws.
- D. The requested accommodation will not require a fundamental alteration of the zoning or building laws, policies and/or procedures of the city. "Fundamental alteration" is defined in the Fair Housing Laws.
- E. The requested reasonable accommodation will not, under the specific facts of the case, result in a direct threat to the health or safety of other individuals or substantial physical damage to the property of others.

(Ord. No. 1462, § 2, 3-12-13)

17.42.070 - Conditions of approval.

In granting a request for a reasonable accommodation, the director or planning commission, as applicable, may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required by section 14.44.060, the Fair Housing Laws and the intent of this chapter. Such conditions may generally include, but are not limited to, the following restrictions:

- A. The city's general/standard conditions of approval applicable to all projects;
- B. That the reasonable accommodation shall only be applicable to particular disabled individual(s); and/or
- C. That the reasonable accommodation shall only be applicable to the specific use for which application is made.

(Ord. No. 1462, § 2, 3-12-13)

17.42.080 - Appeals.

- A. Director Decision. Any applicant who is dissatisfied by the decision made by the director on an application for a reasonable accommodation may appeal the director's decision to the planning commission. The appeal must be filed via written notice detailing the grounds for appeal, such notice must be received by the director within fifteen days of the mailing of the director's decision. Upon the filing of a notice of appeal, the director will set the matter for a public hearing before the planning commission to occur not later than sixty days from the date of

filing. Notice of the appeal hearing will be given to the applicant by mail at least ten days prior to the hearing. Any person who is dissatisfied by the decision of the planning commission may make a further appeal to the city council in accordance with applicable procedures of section 17.68.090 et seq. of this code. The planning commission's decision will be final absent a timely appeal to the city council.

- B. Planning Commission Decision. A decision of the planning commission on an application for a reasonable accommodation considered concurrently with another application for a discretionary approval is subject to the same appeal rights and procedures that apply to the other discretionary approval or pursuant to section 17.68.090 et seq., as applicable.

### 3.5 Affirmatively Furthering Fair Housing (AFFH)

As part of the Community Development Block Grant (CDBG) program certification process, participating jurisdictions must prepare an analysis of impediments to fair housing choice every five years. The County of Riverside Analysis of Impediments to Fair Housing Choice (County of Riverside AI), is an assessment of the regional laws, ordinances, statutes, and administrative policies, as well as local conditions that affect the location, availability and accessibility of housing. The County of Riverside AI also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing, and provides solutions and measures that will be pursued to mitigate or remove identified impediments. The analysis of impediments to fair housing choice covers Riverside County and provides a demographic profile of Riverside County, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. The County of Riverside AI identifies the following impediments to fair housing:

- Hispanic and Black residents continue to be underrepresented in the homebuyer market and experienced large disparities in loan approval rates.
- Concentrations of housing choice voucher use have occurred due to the geographic disparity in terms of rents.
- Housing choices for special needs groups, especially persons with disabilities, are limited.
- Enforcement activities are limited.
- Today, people obtain information through many media forms, not limited to traditional newspaper noticing or other print forms.

The County of Riverside AI does not provide an analysis of impediments specific to the City of Banning. Furthermore, the City has not identified impediments to housing beyond those discussed above. The City does not currently address AFFH either through policy or programs. The City will incorporate new goals, objectives, and programs, to ensure that fair housing is thoroughly and adequately addressed.

The County of Riverside AI provides a strong foundation and context within which to assess the State of fair housing in the city of Banning. The County of Riverside AI report listed the following impediments that are specific to Banning's land use policies:

- Recent changes to density bonus law
- ADU policies
- Lack of inclusionary housing requirements

## 3.6 Governmental Constraints

### Development and Planning Fees

The City charges various fees and assessments to cover the cost of processing permits and providing certain services and utilities. Table 34 show below summarizes the City's planning fee requirements for residential development. In addition to City fees charged at the time building permits are issued, developers are required to pay school impact and water connection fees.

**Table 34 Development and Planning Fees**

| Development Process  | Related Fee   |
|--|---|
| <b>Planning and Zoning</b>                                 |   |
| Variance   | \$4,269.00  |
| Site Development Plan                                      | \$16,008  |
| Conditional Use Permit                                     | \$4,718   |
| Specific Plan  | \$16,133.00   |
| General Plan Amendment (Land Use)                          | \$8,008.00  |
| General Plan Amendment (Policy)                            | \$7,070.00  |
| Zone Change  | \$6,917.00  |
| <b>Subdivisions</b>  |   |
| Tentative Subdivision Map                                  | \$8,985.00 - \$9,983.00 depending on number of lots |
| Tentative Parcel Map                                       | \$8,253.00  |
| Design Review  | \$5,881   |
| <b>Environmental Review</b>                                |   |
| Environmental Assessment (City Facilitation of Consultant) | \$8,209.00  |
| Environmental Mitigation/Monitoring                        | \$5,000.00  |
| <b>Development Impact Fees</b>                             |   |
| <b>Fire Protection Fee</b>                                 |   |
| Single-Family  | \$746 per unit                                      |
| Multi-Family   | \$610 per unit                                      |
| <b>Police Facilities</b>                                   |   |
| Single-Family  | \$1,200 per unit                                    |
| Multi-Family   | \$982 per unit                                      |
| <b>Park Fee</b>  |   |
| Single-Family  | \$3,840 per unit                                    |
| Multi-Family   | \$3,142 per unit                                    |
| <b>General Facilities Fee</b>                              |   |
| Single-Family  | \$521 per unit                                      |
| Multi-Family   | \$426 per unit                                      |
| Water Facilities Fee                                       | \$9,744 per unit                                    |
| Wastewater Facilities Fee                                  | \$5,061 per unit (EDU fee)                          |

Source: City of Banning, March, 2020. Department of Community Development, Development Impact Fee Update Study 2019  
<http://banning.ca.us/DocumentCenter/View/6361/Banning---Development-Impact-Fee-Update-Study---Final-8-7-19>



The City's total development impact fees in 2020 were approximately \$21,112 per unit for single-family housing and \$19,965 per unit for multi-family housing. Through the policies and programs of the Housing Element, the City proposes to monitor all regulations, ordinances, departmental processing procedures, and residential fees to assess their impact on housing costs.

## **On- and Off-Site Improvements**

Requirements for on- and off-site improvements vary depending on the presence of existing improvements, as well as the size and nature of the proposed development. In general, most residential areas in Banning are served with infrastructure. Infrastructure is already established in multi-family areas. Even for single-family areas, only minor roadway and sewer extensions may be required. Developers are responsible for all on-site improvements, including parking, landscaping, open space development, walkways, and all utility connections.

Public street widths are specified in Banning Development Code. This document establishes street standards for various types of streets. For residential streets, the typical right-of-way (ROW) is 10 feet from curb to curb face. If curb and gutter does not exist, then the ROW is typically 30 feet from the street centerline. Private streets must be wide enough to meet standards established in the California Fire Code for Fire Department equipment needs.

The City of Banning's fee structure includes some on- and off-site improvements, which are described in the section above. Off-site improvement fees include drainage and sewer facility fees, school fees, park land fees, and public facility fees, among others.

## **Building Codes and Enforcement**

The City adopted and enforces the 2022 California Building Standards Code (aka California Building Code or CBC) which ensures that all housing units are built to specified standards. The code is substantially determined by the International Code Council and the State of California. The City adopted the code with few administrative amendments concerning the height of fences and swimming pool enclosures and exit alarms. These standards do not significantly increase construction costs. Exceptions or methods of alternative compliance to the requirements of the CBC are contained in the code. The City has no local ability to waive the provisions of the CBC. A mechanism within the building code allows for an appeals process to challenge interpretations of the building code requirements.

The Building Division actively enforces the California Building Code provisions that regulated the access and adaptability of buildings to accommodate persons with disabilities. Government Code Section 12955.1 requires 10 percent of the total dwelling units in multi-family buildings without elevators, consisting of three or more rental units or four or more condominium units, subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests
- A least one bathroom shall be located on the primary entry level served by an accessible route
- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include but are not limited to kitchens, bathrooms, living rooms, bedrooms, or hallways
- Common use areas shall be accessible
- If common tenant parking is provided, accessible parking spaces are required

The City enforces Title 24 of the California Code of Regulations that regulates the access and adaptability of buildings to accommodate persons with disabilities. No unique restrictions are in place that would constrain the development of housing for persons with disabilities. Compliance with provisions of the Code of Regulations, including the California Building Standards Code, is reviewed and enforced by the Building Division of the Community Development Department as a part of the building permit submittal.

Furthermore, the City has a program to inspect and enforce building code standards. Planning and redevelopment staff work closely with the Building Division to identify and convert substandard and dilapidated housing conditions. Compliance with Building Code standards may add to the cost of construction but is necessary to protect building integrity and the wellbeing of inhabitants. Code Enforcement related to dilapidated housing within the City is done on a proactive basis when possible through active patrols by City's Code Officers, or as needed through reporting of residents or other complaints.

## **Processing and Permit Procedures**

The processing time needed to obtain development permits and required approvals is commonly cited by the development community as a prime contributor to the high cost of housing. Processing times depend on the magnitude and complexity of the proposed development project. Banning's processing procedures for new housing developments and the modification of existing residential projects include the following frequently used permits and actions: tentative maps, design review permits, administrative permits and appeals, site plan reviews, variances, and subdivisions. The City does not have a separate design review board for residential development. An applicant may submit an early design review application form to be reviewed before the City's planning department prior to formal submittal of a project to the City. However, a pre-application is not a requirement of the Municipal Code. In accordance with new transparency requirements, the City of Banning has posted all zoning, development standards, and fast-tracked development timeframes and fees on the City's website.

Certainty and consistency in permit processing procedures and reasonable processing times is important to ensure that the development review/approval process does not discourage developers of housing or add excessive costs (including carrying costs on property) that would make the project economically infeasible. The City is committed to maintaining comparatively short processing times, although total processing times will vary by project. Recent data shows that processing times for complex discretionary applications can range from six to eight months and Special Use Permit (SUP) processing times average four to six months. Applications for less complicated projects, such as parcel maps and plot plans, can generally be processed in six months or less, although this depends on site constraints and projects issues that may arise. The City is currently in compliance with the requirements under the State's Streamlining Review Act.

Banning's site development permit findings and standards of approval, which can be found under section 17.56.050 of the City's Development Code, require conformance with Banning's policies and codes. The standards listed in these findings are intended to provide predictable, clear, concise, and unambiguous procedures for the review and evaluation of site development and plot plans that do not create any undue burden or barrier for permit approval. Prior to making a determination, the review authority shall determine that the project adequately meets adopted City performance standards and design guidelines, based upon the following findings:

- g. The proposed project is consistent with the General Plan.

- h. The proposed project is consistent with the Zoning Ordinance, including the development standards and guidelines for the district in which it is located.
- i. The design and layout of the proposed project will not unreasonably interfere with the use and enjoyment of neighboring existing or future development and will not result in vehicular and/or pedestrian hazards.
- j. The design of the proposed project is compatible with the character of the surrounding neighborhood.

#### *Fast Track Policy*

The City adopted a “Fast Track” Policy for development review in December 2020. A residential development project is eligible if it meets at least one of the following criteria:

- a. The project has received a form of public assistance from a federal, state, county, or local agency and at least 15 percent of all project residential units that are either owner-occupied or tenant-occupied have an irrevocable covenant that restricts occupants for low-income households for a minimum period of 30 years; or
- b. The project has received a form of public assistance from the federal, state, county, or local agency and at least 15 percent of all project residential units that constitute mutual self-help housing units have an irrevocable covenant that restricts occupants for low-income households for a minimum period of 15 years; or
- c. The project is funded by Multifamily Housing Revenue Bonds authorized by the California Debt Limit Allocation Committee and at least 20 percent of all project residential units have been enforceable restricted to be affordable to low-income households for a minimum period of 30 years.

Fast Track projects can have a free Preliminary Application Conference (PAC) meeting with the City departments. As part of this process, the Planning Department shall issue a transmittal, including a memorandum attached to the site plan which describes the proposed project, no less than five business days before conducting the PAC meeting. At the Fast Track PAC meeting, the staff members of the Development Review Team shall identify all necessary and required revisions to the site plan and all required special studies, including, but not limited to, studies relating to traffic, geology, hydrology, drainage, water quality, hazards, airport review, biology or cultural resources, reports and/or studies. After the project proponent has made all the required revisions to the site plan and has prepared all the required special studies, the project proponent shall submit the appropriate land use applications, including the appropriate special studies, on the forms and in the method required by the Department. The applications are considered by the Development Review Team and then set for hearing before the City Council. A hearing before the Planning Commission is not required unless the proposed project requires a concurrent General Plan Amendment, Zone Change, and/or Specific Plan/Specific Plan Amendment in order to authorize the use in the particular zoning district and land use designation. Under the Fast Track program, the City has committed to a 90-day timeframe (submittal to approval) for all projects.

Program 12 of this Housing Element strives to make the development process in Banning more efficient. This program will also uphold SB 330 by further streamlining the permit process and directly coordinating with developers to ensure a timely application and development process.

## Design Review

The current design review process consists of staff review at the time of building permit plan check. The architectural plans are reviewed for consistency with design guidelines such as adequate variation of rooflines, articulations of structure, and no blank walls. Projects are not denied but are revised through this process. The Residential Design Development Design Guidelines, originally adopted by the City Council and revised in 2006, complement the mandatory site development regulations contained in the City's Zoning Ordinance and Specific Plans. There is no special fee for design review and the additional time and cost to the developer is minimal. The most common changes resulting from the review are additional windows or other minor architectural features. This process does not serve as a constraint to housing production. Program 12 addresses the design review process in addition to project review.

## City Residential Development Cost-Reduction Programs

To help offset the high cost of development, the City has an existing program which waives City-related fees for construction of a single-family residence (up to \$20,000). There must be an affordability covenant required for 45 years. The City also has an underwriting program for multi-family complexes which requires a 55-year affordability covenant and City Council approval. Programs are subject to funding availability.

## 3.7 State Tax Policies and Regulations

### Proposition 13

Proposition 13, a voter initiative that limits increases in property taxes except when there is a transfer of ownership, may have increased the cost of housing. The initiative forced local governments to pass on a greater share of the costs of housing development to new homeowners.

### Article 34

Article 34 of the State constitution requires that low-rent housing projects developed, constructed, or acquired in any manner by a public agency must first be approved by a majority of the voters. Requiring such approval can act as a barrier to the development of affordable housing due to the uncertainty and delay caused by the process.

## Federal and State Environmental Protection Regulations

Federal and State regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs resulting from fees charged by local government and private consultants to complete the environmental analysis, and from delays caused by the mandated public review periods, add to the overall cost of housing and are passed on to the buyer. However, the presence of these regulations helps inform the public of potential environmental impacts, preserve environmental resources, and maintains quality of life for Banning residents.

## 3.8 Infrastructure and Environmental Constraints

### Infrastructure and Services

Additional factors that could constrain new residential construction is the cost and accessibility of adequate infrastructure such as street upgrades, water and sewer lines, lighting, and other

necessary improvements and connections required to serve and support residential development. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The cost of these facilities is generally borne by developers, thereby increasing the cost of new construction.

### *Electricity and Natural Gas*

The City of Banning Electric Utility Department provides electric services and facilities to the City. The City procures the majority of its electricity through contracts with the Southern California Public Power Authority which provides sufficient capacity. Sites identified in the sites inventory located within the RSG and Butterfield Specific Plan will be developed with water and sewer infrastructure. All new permanent electrical distribution and transmission lines serving the RSG Specific Plan and Butterfield Specific Plan developments will be placed underground where needed and in accordance with the timing of development. Electricity and natural gas infrastructure and services are available and do not present a constraint on development.

### *Sewer and Water*

The City provides potable water services. The City recently entered into a joint venture agreement with the Cherry Valley Water District to share water from three additional wells in Beaumont. Wastewater generated is treated by the City-managed Wastewater Utility Department. Senate Bill 1087 (enacted 2006) requires that water and wastewater service providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water and sewer providers from denying or conditioning the approval of development that includes housing affordable to lower income households unless specific written findings are made. The City will provide a final copy of the final Housing Element to the Wastewater Utility Division and the Cherry Valley Water District within 30 days of adoption. The City of Banning will also continue to coordinate with outside districts to ensure priority service provision to affordable housing developments, as described in Program 16.

Sites identified in the sites inventory located within the RSG and Butterfield Specific Plan will be developed with existing water and sewer infrastructure. These Specific Plans include plans for water and sewer service, and are incorporated into utility and service system master plans and forecasts. Water utilities are also available for sites located in the northern portion of the city known as Banning Bench. Wastewater utilities are either available for sites at Banning Bench, or the sites are permitted for septic tank systems. Water and wastewater infrastructure and services are available and do not present a constraint on development.

## **Environmental Constraints**

Additionally, environmental constraints are another potential housing constraint, as they have the potential to limit the density and locations of housing developments due to hazards. A city's environmental setting and characteristics can greatly affect the feasibility and cost of developing housing. There are a number of environmental factors in Banning that can affect the character and density of development in the City, including the availability of land and water, topography that limits building sites such as steep slopes, and environmental hazard zones for such as earthquakes, unstable slopes and soils, flooding, and wildfires.

### *Earthquakes and Seismic Activity*

Slope instability is of great concern in the City as development reaches higher elevations within the hills due to the risk of landslides and erosion. Slope failures can occur on the steep slopes of the foothills and mountains that surround the City. Additional areas of concern include areas with steep canyon walls and the natural slopes that face the southern edge of the City that may be prone to rockfalls and landslides.

Historically, Riverside County has experienced strong shaking and damage from path earthquakes. The San Andreas fault is over 700 miles long and runs from the Gulf of California to north of the San Francisco Bay. The San Andreas Fault zone passes through the northerly portion of Banning. In addition to the San Andreas Fault System, there are several major active faults including Banning Fault, San Gorgonio Pass Fault Zone, San Jacinto Fault Zone, and the Garnet Hill Fault.

For the City, ground-shaking is the greatest seismic hazard. Seismic ground shaking can result in landslides, ground lurching, structural damage or destruction, and liquefaction. The City implements all CBC standards for housing development, which helps protect development from damage from seismic incidents and other geological hazards.

### *Flooding*

The City encompasses sharp contrasts in terrain, with high to moderately steep slopes bordering the City on the south, and a narrow southeastward-sloping valley characterizing the central part of the City. Steep, rugged mountains rise from the northern edge of this valley to form a dramatic backdrop. The mountains have been deeply incised by large, south-flowing streams that have created drainage basins that extend miles beyond the City limits. The San Gorgonio River is the largest of the City's streams and has the greatest drainage basin area.

Floods that impact the City are attributed to three different types of storm events: general winter storms, combining high-intensity rainfall and rapid melting of the mountain snowpack; tropical storms out of the southern Pacific Ocean; and summer thunderstorms. Flood hazards in the Banning area can be classified into three general categories; flash flooding through natural channel, ponding with flows impeded by man-made obstructions, and sheet flooding across the alluvial fans upon which most of the City's development is currently located.

To help offset impacts on residential development due to local flooding, all future developments must comply with the requirements and design standards of the City's Development Code Section 15.64 that sets forth design and construction standards to reduce potential impacts to flood hazards. In addition to these regulations, the City's Land Use Element and Environmental Hazards Element of the General Plan outlines policies that discourage future development in areas prone to flooding and other hydrological hazards. Furthermore, the Banning Master Drainage Plan contains mitigation strategies and recommendations to help reduce potential damage and risk as a result of flooding and water inundation.

### *Wildfire*

The City's General Plan identifies wildfire hazards as a primary concern. The typically mild, wet winters result in an annual growth of grasses and plants that dry out during the hot summer months. This dry vegetation provides fuel for wildfires in the autumn when the area is intermittently impacted by Santa Ana winds – hot, dry winds that blow across the region in the late fall prone to spreading fires. Historically, a large portion of the Banning planning area has burned, often repeatedly. In the City, the Extreme Fire Hazard Zone primarily includes the undeveloped canyon

and hillside areas where native vegetation predominates (chaparral scrub and tree assemblages). The State-defined Very High Fire Hazard Severity Zone (VHFHSZ) includes areas of moderate relief at the interface with the more developed areas of the City. This zone is primarily comprised of undeveloped or partially undeveloped areas which tend to have large grass growth. The City's downtown core, which is primarily urban development, is not considered to be located in a very high or high fire hazard zone.

To help reduce and mitigate against wildfire threats, the City established standards set forth in the City's Zoning Ordinance to comply with the California Fire Code and necessary amendments. Additionally, any new development located in an area that is designated as a VHFHSZ is required to comply with all sections of Chapter 7A of the revised CBC (Materials and Construction Methods for Exterior wildfire Exposure) and Chapter 47 of the CFC (Requirements for Wildland Urban Interface Fire Areas). Furthermore, future development would be guided by General Plan policies pertaining to wildfire threat.

### *Resource Management Plans*

In addition to the environmental hazards discussed above, the City is ecologically diverse, with many significant areas of native vegetation located throughout the City. Large portions of native vegetation along the San Geronio River and the undisturbed slopes of the San Bernardino Mountains contain several sensitive vegetative species. These areas are primarily zoned as open space to help protect these natural resources and the biological communities within them.

To help further implement conservation of biological and natural resources in the City, the City observes the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP). The WR-MSHCP is a comprehensive, multi-jurisdictional plan to conserve endangered and threatened species and their habitats. Future development, redevelopment, and city-wide improvements must be in compliance with the MSHCP and provide mitigation as required.

The City does not currently have its own certified Climate Action Plan but participates in the 2014 Western Riverside Council of Governments Sub Regional Climate Action Plan. The Climate Action Plan strives to use energy more efficiently, harness renewable energy to power buildings, enhance access to sustainable transportation modes, more efficiently recycle waste, build local food systems, create new green jobs, and improve overall quality of life. Banning seeks to continue to improve energy efficiency and water conservation in its community through programs such as the Energy Efficiency Rehabilitation Program and the Energy Efficiency and Minor Home Repair Program.

## 4 Housing Resources

Resources that are available for the development, rehabilitation, and preservation of housing in the City of Banning are discussed in this section. The analysis demonstrates the City's ability to satisfy its share of the region's future housing need, identifies financial and administrative resources available to support housing activities and facilitate implementation of City housing policies and programs.

### 4.1 Future Housing Needs

State law requires that each community play a role in meeting the region's housing needs. Specifically, a jurisdiction must demonstrate in the Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. This section assesses the adequacy of Banning's land inventory in meeting future housing needs.

#### Regional Housing Needs Assessment (RHNA) Requirement

This update of the City's Housing Element covers the planning period of October 2021 through October 2029 (also referred to as the 6th Cycle Housing Element update). Banning's share of the regional housing need is allocated by SCAG and based on factors such as recent growth trends, income distribution, and capacity for future growth. Banning must identify adequate land with appropriate zoning and development standards to accommodate its allocation of the regional housing need.

Banning's share of regional future housing needs for the 6<sup>th</sup> Cycle planning period is a total of 1,673 new units. This allocation is distributed into five income categories, as shown below in Table 35. The RHNA includes a fair share adjustment which allocates units by income category in order to meet the State mandate to reduce over-concentration of lower income households in historically lower-income communities in the region.

**Table 35 Housing Needs for 2021-2029**

| Income Category (% of County AMI) | Number of Units | Percent        |
|-----------------------------------|-----------------|----------------|
| Extremely Low (30% or less)*      | 155             | 9.30%          |
| Very Low (31 to 50%)              | 162             | 9.70%          |
| Low (51 to 80%)                   | 193             | 11.60%         |
| Moderate (81% to 120%)            | 280             | 16.70%         |
| Above Moderate (Over 120%)        | 883             | 52.70%         |
| <b>Total</b>                      | <b>1,673</b>    | <b>100.00%</b> |

\* The City has a RHNA allocation of 192 very low-income units (inclusive of extremely low-income units). Pursuant to State law (AB 2634), the City must project the number of extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units as extremely low. According to the CHAS data developed by HUD, 33.0% of City households earned less than 50 percent of the AMI. Among these households, 49.3 percent earned incomes below 30% (extremely low). Therefore, the City's RHNA allocation of 317 very low-income units may be split into 155 extremely low and 162 very low-income units. However, for purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low-income category.

Source: Final Regional Housing Needs Allocation, SCAG, (2021).



## 4.2 Credits Toward RHNA

### Units Planned or Approved

Housing units approved and/or pending (and not yet permitted for construction) as of June 30, 2021 can be credited towards meeting the City's RHNA. The City must demonstrate in this Housing Element its ability to meet the remaining housing needs, through the provision of sites, after subtracting anticipated units. Table 36 shows the remaining unit deficit after subtracting units that are pending or approved as of June 30, 2021.

**Table 36 Remaining 2021-2029 Share of Regional Housing Needs**

| Income/Affordability Category | RHNA         | Units Pending or Approved | Remaining Units Deficit |
|-------------------------------|--------------|---------------------------|-------------------------|
| Lower                         | 510          | 9                         | 501                     |
| Moderate                      | 280          | 352                       | 0                       |
| Above Moderate                | 883          | 1,384                     | 0                       |
| <b>Total</b>                  | <b>1,673</b> | <b>1,745</b>              | <b>501</b>              |

As of October 2023, 1,745 units are planned or approved for development. The majority of these sites are located in the Butterfield Specific Plan. Based on regional market rents and sales prices (Table 22), apartments and condominiums/ townhomes are affordable to moderate income households. Single-family homes are generally affordable only to above moderate-income households (Table 23). Affordability of planned or approved units is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. All units except for Vista Serena and the Banning 98 projects would be single-family homes and would have sales prices and rent levels of 120 percent of AMI or above. Vista Serena is a condominium project and would have sales prices at the moderate-income level. The Banning 98 project is a duplex home project with a density bonus provision setting aside 9 units for very low-income households. The remaining 177 units will be available for rent to moderate-income households. Planned and approved projects achieve an average of 79 percent of the maximum allowable density.

**Table 37 Planned or Approved Units (2023)**

| Project Name           | Zoning            | Acreage | Max. Units Allowed | Units Achieved | Percent of Max. Density | Income Category | Specific Plan       | Project Status             |
|------------------------|-------------------|---------|--------------------|----------------|-------------------------|-----------------|---------------------|----------------------------|
| TTM 37388              | LDR, MDR          | 119.97  | 559                | 287            | 51%                     | Above Moderate  | Butterfield         | Entitled/no permits issued |
| TTM 37389              | LDR, MDR          | 152.48  | 760                | 616            | 81%                     | Above Moderate  | Butterfield         | Permits issued             |
| Vista Serena           | HDR               | 2.00    | 36                 | 32             | 89%                     | Moderate        |                     | Entitled/no permits issued |
| TTM 37766              | LDR               | 14.16   | 70                 | 80             | 114%                    | Above Moderate  | Rancho San Gorgonio | Entitled/no permits issued |
| TTM 36710              | LDR               | 10.60   | 53                 | 39             | 74%                     | Above Moderate  |                     | Entitled/no permits issued |
| TTM 37390              | LDR, MDR          | 93.00   | 465                | 362            | 78%                     | Above Moderate  | Butterfield         | Permits issued             |
| Banning 98 - TM 36939  | LDR Density Bonus | 34.60   | 186 9 VLI          | 186            | 100%                    | Moderate        |                     | In Plan Check              |
| Vista Robles - KB Home | LDR               | 65.00   | 143                | 143            | 44%                     | Moderate        |                     | Final Map                  |

## 4.3 Specific Plan Areas

The majority of the planned and approved projects that are anticipated to be constructed during the 2021-2029 planning period are located in Specific Plan areas. Within the Butterfield Specific Plan, 32 moderate income units and 1,262 above moderate-income units are currently planned, while 80 above moderate units are currently planned and within the Rancho San Gorgonio Specific Plan. The development standards of these specific plans are discussed in Chapter 3. Details of these proposed projects are included on Table 37. These units count as credits to the City's RHNA allocation. No additional sites included in Appendix B are located within specific plan areas.

### Butterfield Specific Plan

The Butterfield Specific Plan is a 1,543-acre multi-use community within the northwestern corner of the City of Banning. Butterfield is to be predominately residential, comprised of simple, architecturally designed single-family, detached homes. Neighborhood parks, a public golf course, community parks, schools, open spaces, retail, and commercial parcels are also integrated into the community. The Butterfield Specific Plan proposes a variety of residential opportunities including small, medium, and standard lot single family detached homes; various configurations of single family detached cluster residences and attached single family or multi-family dwellings. Full construction is expected to occur over a 30-year period, with an estimated 180 dwelling units constructed per year.

The community character for Butterfield encompasses the elements of the rustic and natural beauty of the site's surrounding foothill environment. The community landscape concept combines the existing natural character of the site with the historic California ranch vernacular. The theme will be defined and implemented through architectural elements and materials such as stone walls, and other similar materials and finishes throughout the community. Butterfield's high-profile areas such as monumentation, parks, golf course clubhouse, and other community facilities will be highlighted and reinforce the California ranch theme.

### **Rancho San Gorgonio Specific Plan**

The Rancho San Gorgonio (RSG) Specific Plan is an 831-acre master planned residential community within the City of Banning and its sphere of influence. The RSG Specific Plan aims to fulfill the City of Banning's growth objectives by creating a development that responds to planning needs of the area, incorporates existing natural features and park amenities, and provides a variety of land uses. The Plan is organized into 44 planning areas (PAs) that include a variety of residential densities, lot types and housing types, common open spaces, an elementary school site, and a commercial area. Parks and paseos are incorporated throughout the community and buffer the converging existing creeks, while providing walking, riding and vehicle access throughout the community and connecting the RSG Specific Plan's distinct walkable "Village" neighborhoods.

The RSG Specific Plan supports a variety of residential opportunities including small, medium and larger lot single-family detached homes, various potential configurations of single-family detached cluster residences, and potential attached multi-family dwellings. The variety of residential uses provides housing at different affordable price levels. Through the use of a master plan, the RSG Specific Plan responds to the community's vision and objectives by providing a desirable high-quality planned community that integrates residential living areas and amenities throughout the RSG property. The mix of residential, commercial, open space and recreational opportunities provided by the RSG Specific Plan is organized and connected by the natural character of the land. The RSG Specific Plan's location within Banning, situated between the San Bernardino Mountains, including Mount San Gorgonio, and the San Jacinto Mountains, provides a human experience with design concepts that respond to the physical, social and emotional needs of its residents. Needed infrastructure improvements including roadways, drainage, and other improvements have been identified and sensitively incorporated into an urban design concept that celebrates open space and the public realm.

### **Accessory Dwelling Units (ADU)**

ADUs provide affordable housing options for family members, friends, students, the elderly, in-home health care providers, the disabled, and others. An ADU can be located on residentially zoned property that has an existing single-family or multi-family residence. Only one ADU was permitted in Banning in 2020. Due to the low number of ADU applications, this housing element update is not considering ADU development credits to the RHNA allocation.

Banning passed Ordinance NO. 1559 in January 2020, which established development standards for junior ADUs consistent with state law. These standards were intended to facilitate the development of ADUs in a manner that preserves the integrity of single-family and multi-family residential areas, avoids adverse impacts on such areas, and ensures a safe and attractive residential environment. Banning's Municipal Code underwent a substantial amendment related to second units to reduce barriers and provide more flexible standards for ADUs.

## 4.4 Remaining RHNA

After accounting for units planned and approved, there is a remaining need of 501 units, all lower income units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units.

### Residential Sites Inventory

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate a jurisdiction's share of the regional growth. The City is committed to identifying sites at appropriate densities as required by law. The State, through AB 2348, has established "default" density standards for local jurisdictions. State law assumes that a density standard of 30 units per acre (du/acre) is adequate to facilitate the production of housing affordable to lower income households. Therefore, in estimating potential units by income range, it is assumed that:

- A density of zero to 14 du/acre (primarily for single-family homes) is assumed to facilitate housing in the above moderate income category;
- A density of 15 to 29 du/acre (primarily for medium density multi-family developments) is assumed to facilitate housing in the moderate-income category; and
- A density of 30 or more du/acre (primarily for higher density multi-family developments) is assumed to facilitate housing in the very low- and low-income category.

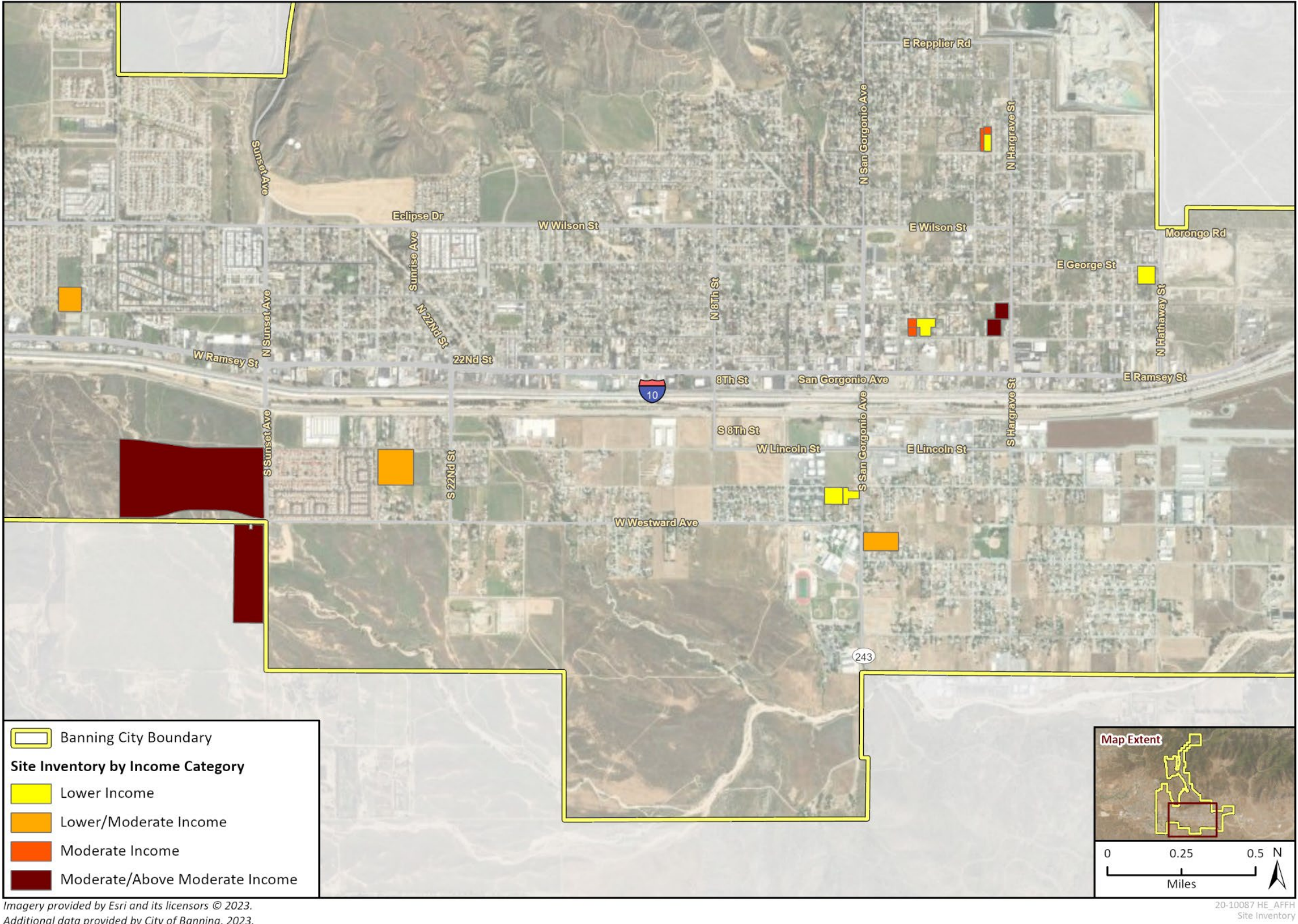
Geographic information system (GIS) data was used to identify potential sites for housing development. There are 16 vacant sites that can accommodate housing development. In 2022, the City rezoned 12 of these sites to Very High Density Residential (VHDR). Currently, the VHDR zone allows a minimum of 19 units per acre (du/acre) and a maximum of 24 du/acre. In January 2024, the City will amend the VHDR zone to allow a minimum of 24 du/acre and allow a maximum of 30 du/acre to be able to accommodate housing affordable to very low and low-income households, as outlined in Program 4 of the Housing Plan. The remaining four vacant sites are currently designated High Density Residential (HDR), which allows a minimum of 11 du/acre and a maximum of 18 du/acre and can accommodate units affordable to moderate- and above moderate-income households. A detailed sites inventory of the residential capacity can be found in Appendix B. The sites are shown in Figure 6.

None of the sites in the inventory are in, or planned to be in, zones that would allow mixed use or nonresidential uses. The City used conservative assumptions to estimate the development capacity of each site. Specifically, the site inventory assumed the minimum allowable density of all parcels instead of the full development potential. This assumption is based on historical development patterns and accommodates for a variety of site-specific factors such as ingress and egress, parking, landscaping, and other potential physical constraints to development, topography, and site configuration.

In the event that sites identified for lower or moderate-income development do not develop with sufficient lower- or moderate-income units to meet the RHNA, the City will prioritize its buffer allocation to accommodate any shortfall of lower- or moderate-income units, as directed by Program 5, Residential Sites Monitoring Program.



Figure 6 Vacant Residential Parcels



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One site in the inventory is proposed for annexation. The City will undertake steps outlined in Program 30 to ensure appropriate timing of the annexation for residential development within the planning period. The property in question is located with a proposed specific plan for which an administrative draft environmental impact report (EIR) has been prepared, but as of November 2023, has not been made available for public review and comment. The project is expected to include LAFCO hearings for incorporation in 2024, prior to the City taking an approval action on the proposed specific plan and EIR.

The City considered multiple criteria for sites appropriate for high-density residential development:

- Currently vacant
- Located within urbanized residential areas
- Adjacent and direct access to existing public streets
- Relatively flat
- Soil disturbance from prior use (farming/discing) and/or weed abatement (not likely habitat for threatened or endangered species)
- The entire parcel is “usable,” no obvious physical site constraints
- Supporting infrastructure: water, sewer, electricity, and gas located in existing streets or right-of-way; and other utilities readily available
- Proximity to planned transit stops
- Proximity to public facilities, e.g., schools, parks, Civic Center

A summary of planned and approved projects, vacant, and rezoned sites by income category is located in Table 38.

The City will also propose a new General Plan land use category that will be introduced after adoption of the Housing Element. This new category will support 25+ du/ac and could facilitate the future development of lower income units. This new land use will not be part of the housing plan included in this Housing Element.

## 4.5 Adequacy of Residential Sites Inventory in Meeting RHNA

Vacant parcels in Banning can accommodate the development of 909 new housing units. Current and planned densities can accommodate both lower- and moderate-income units. Given these estimates, the City will have enough capacity to accommodate its 2021-2029 RHNA.



**Table 38 Adequacy of Residential Sites Inventory**

|                                     | Lower-Income Units | Moderate-Income Units | Above Moderate-Income Units | Total Units  |
|-------------------------------------|--------------------|-----------------------|-----------------------------|--------------|
| <b>RHNA Allocation</b>              | <b>510</b>         | <b>280</b>            | <b>883</b>                  | <b>1,673</b> |
| Planned and Approved Units          | 9                  | 352                   | 1,384                       | 2,065        |
| ADUs                                | 0                  | 0                     | 0                           | 0            |
| <b>Remaining RHNA After Credits</b> | <b>501</b>         | <b>0</b>              | <b>0</b>                    | <b>501</b>   |
| Vacant Sites                        | 555                | 242                   | 112                         | 909          |
| <b>Total Units</b>                  | <b>564</b>         | <b>594</b>            | <b>1,496</b>                | <b>2,654</b> |
| <b>Total Unit Surplus</b>           | <b>63</b>          | <b>314</b>            | <b>613</b>                  | <b>981</b>   |

## 4.6 Availability of Infrastructure and Services

The City is committed to actions and expenditures to provide infrastructure and enhancements meant to encourage and facilitate subsequent development. Banning's Capital Improvement Program provides for the maintenance and improvement of the City's infrastructure including such items as: streets, sidewalks, sewers, storm drains, water system, street lighting, traffic signals, and other infrastructure projects. The existing infrastructure system may require minor upgrades to address age and condition-related issues; however, the systems do contain sufficient capacity to allow for the development of 1,673 additional residential units as required by the City's RHNA allocation.

Infrastructure extensions and improvements would be required to support both the Butterfield Specific Plan and the RSG Specific Plan. Proposed onsite infrastructure includes storm drains, retention/detention basins, wastewater, water, recycled water, and dry utilities (i.e., electric, gas, telephone, and cable) that would connect to existing facilities.

### Sewer System

Banning's Municipal Water and Sewer Service is responsible for supplying the majority of sewer collection and treatment services within the City. The utility collects wastewater from homes and businesses in the City and treats the sewage at the City's Wastewater Reclamation Plant. The City is currently in the process of expanding its Wastewater Reclamation Plant to provide tertiary treatment of wastewater to use to water golf courses and parkland in the City. The City adopted the 2016 Sewer System Management Plan which establishes management, operation, and maintenance practices for the sewer system. Both the Butterfield Specific Plan and the RSG Specific Plan include a Sewer Master Plan outlining the sizes and locations of proposed sewer mains. Banning's existing sewer system has the capacity to adequately accommodate the additional residential units.

### Water System

Banning's Municipal Water and Sewer Service is responsible for supplying clean water to the City and surrounding areas. The service supplies local groundwater pumped from 22 City-owned wells located in the City's water canyon along with other parts of the City. Both the Butterfield Specific Plan and the RSG Specific Plan include a Potable Water Master Plan outlining the sizes and locations of proposed water mains. In addition, the City recently entered into a joint venture agreement with the Cherry Valley Water District to share water from three additional wells in Beaumont. The 2015 Urban Water Management Plan (UWMP) for the Beaumont Cherry Valley Water District establishes



planned upgrades to the water distribution system within the City. The UWMP assumes 2,732 dwelling units as the ultimate build-out need. Banning's existing potable water system in combination with the Cherry Valley Water District has the capacity to adequately accommodate the additional residential units.

### **Stormwater and Drainage System**

The National Pollutant Discharge Elimination System (NPDES) permit program is designed to monitor, reduce, and control the amount and type of pollutants that enter the storm drainage system. As required by state law, Banning implements a Drainage Area Management Plan and Local Implementation Plans (LIP) to manage urban runoff and preserve predevelopment hydrology. Banning's existing stormwater system has the capacity to adequately accommodate the additional residential units.

### **Dry Utilities**

The Banning Electric Utility is responsible for supplying electricity to the City and surrounding areas. Other dry utilities such as natural gas, telephone and data services, and cable television are serviced by contracted providers within the City. Providers include, but are not limited to, SoCalGas, AT&T, and Spectrum.

### **Circulation System**

The City's Circulation Element outlines the long-term plan for roadways, including numbers of lanes, right-of-way, and general operating conditions. It also provides guidance relating to the transit system, goods movement system, and nonmotorized travel, including bicycle and pedestrian travel and serves as a comprehensive transportation management strategy.

## **4.7 Financial Resources**

The primary funding source that Banning uses for implementation of its housing programs is Community Development Block Grant (CDBG) funds. The City will also continue to use U.S. Department of Housing and Urban Development (HUD) funds administered through the County's Housing Choice Voucher Program for rental assistance. Another significant financial resource available to the City of Banning for the preservation of at-risk housing, improvement, and development of affordable housing is HOME Investment Partnership (HOME) funds accessible through the State.

### **Community Development Block Grant (CDBG)**

The CDBG Program is administered by HUD. Through this program, the federal government provides funding to jurisdictions to undertake community development and housing activities.

Activities proposed by the jurisdictions must meet the objectives and eligibility criteria of CDBG legislation. The primary CDBG objective is the development of viable urban communities, including decent housing and a suitable living environment, and expanding economic opportunity, principally for persons of low-and moderate income. Each activity must meet one of the three broad national objectives of:

- Benefit to low-and moderate income families;
- Aid in the prevention of elimination of slums or blight; or
- Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community.

### **HOME Investment Partnership Act (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, including:

- Building acquisition
- New construction and reconstruction
- Moderate or substantial rehabilitation
- Homebuyer assistance
- Rental assistance
- Security deposit assistance

Banning will receive grants based on the formula prescribed under federal law for the CDBG. Funding amounts will vary from year to year based on annual revenues to the Building Homes and Jobs Trust Fund.

### **Permanent Local Housing Allocation (PLHA)**

The PLHA program, also known as the Building Homes and Jobs Act, or Senate Bill 2 (SB 2), provides a permanent source of funding to all local governments in California to help cities and counties implement plans to increase the affordable housing stock. Funding will help Banning to:

- Increase the supply of housing for households at or below 60 percent of area median income;
- Increase assistance to affordable owner-occupied workforce housing;
- Assist persons experiencing or at risk of homelessness;
- Facilitate housing affordability, particularly for lower- and moderate-income households;
- Promote projects and programs to meet the local government's unmet share of regional housing needs allocation; and
- Ensure geographic equity in the distribution of funds.

Banning will receive grants based on the formula prescribed under federal law for the CDBG. Funding amounts will vary from year to year based on annual revenues to the Building Homes and Jobs Trust Fund.

## 4.8 Administrative Resources

### **City of Banning Community Development Department**

The Community Development Department provides and coordinates development information and services to the public. Specifically, this involves inspection and enforcement of City-adopted building codes, plan checking for code compliance, issuance of City-required permits, record keeping of city maps, and processing of Site Development Plans.

The Planning division is tasked with ensuring that land uses in Banning comply with City codes, the General Plan, City Council and Planning Commission policies, and State law requirements. Approval of projects through the planning process is required prior to issuing grading and building permits. Advanced planning programs provided by the division include a comprehensive General Plan update (including periodic update of the Housing Element), preparing and amending specific plans, and conducting special land use studies as directed by the Planning Commission and City Council.

On December 14, 2020, an update to the City's administrative policies was authorized to allow for the streamlining the permitting and review processes for development projects that will create significant employment opportunities and/or substantially increase taxable sales within the City of Banning. As discussed in Chapter 3, the Fast Track processing policy is intended to promote economic sustainability by expediting the entitlement process for qualifying residential, commercial and industrial development projects.

### **County of Riverside**

The County of Riverside administers a number of housing programs on behalf of the City of Banning. These include the HOME program, Mortgage Credit Certificate Program, and Section 8 Housing Choice Voucher Program.

### **Nonprofit Organizations**

Nonprofit housing developers and service providers are a critical resource for accomplishing the goals and objectives of this Housing Element. The following developers and service providers are some of the nonprofit organizations that have been active in the City and may assist in the implementation of Housing Element programs and the preservation of at-risk housing:

- California Department of Fair Employment and Housing
- Housing and Economic Rights Advocates
- Jamboree Housing
- Riverside Housing Development Corporation
- Southern California Association of Nonprofit Housing

## 5 Review of Past Accomplishments

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To develop appropriate programs to address the housing issues identified in the 2013-2021 Housing Element, the City of Banning has reviewed the housing programs adopted in 2013-2021 Housing Element and evaluated the effectiveness of these programs in delivering housing services and assistance. Table 39 summarizes the City's progress toward the previous RHNA and Table 40 provides a detailed program-level assessment of housing accomplishments over the last planning period.

The City has experienced relatively low residential development since the economic downturn of the previous decade. In 2012, Governor Brown effectively dissolved over 400 Redevelopment Agencies across the state of California. As with all other former Redevelopment Agencies, the City of Banning then had a successor agency to conclude the business of the former legal entity. At that time, the City of Banning did not have any funds, nor any number of housing units encumbered by funds provided by the former Redevelopment Agency. With no funds encumbered, no tax increment dollars were available for housing programs or to support staff who may implement housing programs.

The City of Banning Housing Authority exists today as a body comprised of the current City Council members to act on any programs or policies affecting housing; however, there currently is no budget nor are there any funds available to support special needs housing or programs. Any future funding is dependent upon the award of grant monies or other similar funding mechanisms.

Despite these challenges, however, the City has made considerable progress in recent years related to housing programs and policies. The City has helped developed three assisted housing developments with a total of 237 units serving low-income residents (see Table 25). These housing developments helped address housing needs for residents with limited incomes, such as seniors, persons with disabilities, large households, female-headed households, and farmworkers. Additionally, Banning plans to create new temporary housing for up to 40 unhoused residents, and recently adopted amendments to the 2019 California Building Code Standards Codes and California Residential Code to reduce the minimum interior floor area for emergency housing from 70 square feet to 30 square feet to be able to construct single-occupancy sleeping units. The City continues to coordinate with Riverside County to provide housing vouchers.

In 2015, the City Council adopted Resolution No. 2015-103, to continue participating with the County of Riverside Mortgage Credit Certificate (MCC) Program. In 2019, the City revised its zoning ordinance to up zone 225 acres of land for high-density residential development that could accommodate low-income residential development.

The City's 5<sup>th</sup> Housing Cycle programs are appropriate to continue into the 6<sup>th</sup> Housing Cycle. However, the City should expand on efforts to address the needs of special needs population and fair housing issues. Although the City contracts with the Fair Housing Council of Riverside County to address fair housing complaints, the City should take a proactive effort to address fair housing issues, especially for Spanish-speaking residents. The City should also take a proactive role in infrastructure investments to enhance the areas of Banning with higher concentrations of low- and moderate-income households and which were not historically prioritized in investment practices.

**Table 39 Quantified Housing Objectives (2013-2021)**

|                                    | New Construction |        | Rehabilitation |        | Conservation/<br>Preservation |        |
|------------------------------------|------------------|--------|----------------|--------|-------------------------------|--------|
|                                    | Objectives       | Actual | Objectives     | Actual | Objectives                    | Actual |
| Very Low Income                    | 872              | 0      | 0              | 0      | 0                             | 0      |
| Low Income                         | 593              | 0      | 0              | 0      | 0                             | 0      |
| Moderate Income                    | 685              | 0      | 0              | 0      | 0                             | 0      |
| Above Moderate Income <sup>1</sup> | 1,642            | 764    | 0              | 0      | 0                             | 0      |
| Total                              | 3,792            | 764    | 0              | 0      | 0                             | 0      |

<sup>1</sup> Entitled and permitted units from 2018 and 2019 annual progress reports.

Source: Annual Progress Report Permit Summary: <https://www.hcd.ca.gov/community-development/annual-progress-reports.shtml>

**Table 40 Review of Past Accomplishments**

| Program  | Program Name                   | Objectives   | Progress and Continued Appropriateness  |
|--|--------------------------------|--|---|
| <b>Goal #1: Conserving and Improving Existing Affordable Housing</b> |                                |  |   |
| 1  | Code Enforcement               | To decrease the number of unresolved code violations within the City and increase the number of improved properties. | <p><b>Implementation:</b> The timeframe of this program is continuous throughout the planning period. The City currently employs four code enforcement officers as two additional officers were hired 2019.</p> <p><b>Continued Appropriateness:</b> The City will identify potential code violations, utilize property maintenance inspections and work with property owners to resolve code and property maintenance issues to maintain the quality of housing units in the City. (The City's Code Enforcement and Building Safety departments work together to actively and efficiently address code violations and improve communication with owners of properties in need of improvement.) <b>This program is carried into the Housing Element as Program 1.</b></p>   |
| 2  | Housing Rehabilitation Program | To reduce the number of substandard properties.  | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of the program implementation is not completed due to staffing and funding constraints.</p> <p><b>Continued Appropriateness:</b> The City will continue to pursue grant programs such as the Riverside County Home Improvement Program to provide loans to eligible lower-income families for necessary home repair and rehabilitation work, including room additions to alleviate overcrowding. The City will continue to publicize assistance offered by the County, including flyers available at the City Planning counter and information posted on the City's website. The City will prioritize funding as it becomes available to target projects benefitting extreme-low-income households. To the extent feasible, projects may also be eligible for deferral or waiver or City application and processing fees. <b>This program is carried into the Housing Element as Program 2.</b></p> |

| Program | Program Name   | Objectives   | Progress and Continued Appropriateness   |
|---------|--|--|--|
| 3       | Conservation of Existing and Future Affordable Units | To monitor the status of assisted projects.  | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of this program implementation is ongoing as staffing and funding allows.</p> <p><b>Continued Appropriateness:</b> Banning has several assisted affordable housing developments, although none are at risk of conversion to market rate during the current planning period. The City will monitor the status of these projects and take steps to preserve affordability should any become at-risk of conversion in the future. <b>This program is carried into the Housing Element as Program 7.</b></p>   |
| 4       | Section 8 Rental Assistance                          | Continue to support the HARIVCO's applications for additional Section 8 allocations and efforts to provide vouchers for lower-income residents.  | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of the program implementation is not completed due to staffing and funding constraints.</p> <p><b>Continued Appropriateness:</b> The Section 8 Rental Assistance Program provides rental subsidies to very-low-income (up to 50 percent of area wide median income – [AMI]) family and elderly households who spend more than 30 percent of their income on rent. The subsidy represents the difference between 30 percent of monthly income and the actual rent. Section 8 assistance is issued to the recipients as vouchers, which permit tenants to choose their own housing and rent units beyond the federally determined fair market rent in an area, provided the tenant pay the extra rent increment. <b>This program is carried into the Housing Element as Program 15.</b></p>  |
| 5       | Adequate Sites for Residential Development           | <p>The City will continue to annually update an inventory that details the amount, type, and size of vacant underutilized parcels sufficient to accommodate the City's remaining need, by income, to assist developers in identifying land suitable for residential development.</p> <p>As part of the City's Annual Progress Report (APR), required pursuant to GC65400, the City must report on the number of extremely low-, very low-, and moderate-income units constructed annually.</p> | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The City has met the requirement for the 5<sup>th</sup> Cycle (2013-2021 adopted Housing Element)</p> <p><b>Continued Appropriateness:</b> <b>The City will implement a monitoring program that evaluates the current capacity of housing sites for all income levels throughout the duration of the planning period and tracks the City's available housing sites through its internal database to ensure the City remains on track towards satisfying its RHNA target.</b> The City will work with developers, other agencies and the community to address lower income housing need by offering incentives such as density bonuses, options for clustering units, mix of unit types, second units, use of "in-lieu" housing funds, fast-track processing, and reduced fees, and appropriate for proposed lower-income housing. <b>This program is carried into the Housing Element as Program 5.</b></p> |

| Program | Program Name   | Objectives  | Progress and Continued Appropriateness   |
|---------|--|---|--|
| 6       | Facilitate Development of Affordable and Special Needs Housing | Facilitate affordable housing development commensurate with the RHNA and the production of accessible and supportive housing for persons with disabilities. | <p><b>Implementation:</b> Contact affordable housing developers and the Inland Regional Center annually; assist developers with application for funding assistance upon request; initiate a Zoning code amendment in 2014 to clarify development standards in the VHDR zone. The status of the program implementation is not completed due to staffing and funding constraints; zoning code amendments to address certain actions are planned for 2019.</p> <p><b>Continued Appropriateness:</b> The City helped develop three assisted housing developments with a total of 237 units serving low-income residents during the 5<sup>th</sup> Cycle. In order to continue to facilitate the development of housing for low- and moderate-income households and persons with disabilities (including developmental disabilities), the City will implement the following actions:</p> <ul style="list-style-type: none"> <li>▪ Provide administrative assistance to developers seeking available state and federal funding and/or tax credits for the construction of low-and moderate-income housing.</li> <li>▪ Facilitate projects that incorporate affordable units and accessible units by granting modifications to development standards, expedited processing, or financial incentives consistent with state law.</li> <li>▪ Affordable housing developers will be contacted each year to solicit interest and apprise them of available assistance programs.</li> <li>▪ Targeted assistance will be prioritized for special needs housing and extremely-low-income (ELI) units through density bonuses and/or regulatory incentives, modified development standards and fee deferrals, when feasible.</li> <li>▪ Coordinate with the Inland Regional Center regarding the needs and assistance programs targeted for persons with developmental disabilities and make information available on the City website.</li> <li>▪ Clarify development standards in the VHDR zone as necessary to facilitate affordable housing development.</li> <li>▪ Continue to monitor residential development to evaluate whether the required design amenities are acting as an unreasonable constraint on development. If the requirements are found to be unreasonable constraint, a Code amendment will be initiated to modify the design requirements.</li> </ul> <p>This program is carried into the Housing Element as Program 8.</p> |

| Program | Program Name                             | Objectives  | Progress and Continued Appropriateness  |
|---------|--|---|---|
| 7       | Infill and Mixed-Use Housing Development | Facilitate development of multi-family and mixed-use development in the downtown and nearby areas, with special emphasis on housing affordable to low and moderate-income households or persons with special needs. | <p><b>Implementation:</b> The time frame on this program proposes a Zoning amendment by June 2014. The City encourages mixed use development. Zoning code amendments providing allowances for existing nonconforming mixed uses in the GC zone were approved in the past. Additional proposed amendments are planned for the future.</p> <p><b>Continued Appropriateness:</b> The City has targeted the downtown Commercial (DC) area for special incentives for multi-family, SRO and mixed-use development to stimulate revitalization. The City will encourage consolidation of adjacent parcels to enhance development feasibility by providing a lot consolidation density incentive of 5% when two or more parcels totaling at least 1.0 acre are consolidated. This density incentive will be in addition to the density bonus currently allowed. City incentives will also include consolidated permit processing, reduced fees for parcel mergers or lot line adjustment, density bonus and modified development standards. The DC district zoning regulations will also be amended to increase allowable base densities to 24 units/acre for any project that meets the minimum affordability standards under state Density Bonus law (e.g., 5% very-low- or 10% low-income units). The city will also provide administrative and technical assistance with grant applications for affordable or special needs housing development in the downtown area. The city will prioritize future Capital Improvement Program funds for downtown infrastructure improvements if feasible. The city will also review development standards for the General Commercial (GC) zone and consider appropriate revisions to facilitate revitalization and mixed-use development in this area.</p> <p>This program has been effective to address low-income households, including those with special needs. The City helped develop three assisted housing developments with a total of 237 units serving low-income residents during the 5<sup>th</sup> Cycle. This program is carried into the Housing Element as Programs 5 and 17.</p> |
| 8       | Mortgage Credit Certificate Program      | Provide information regarding the MCC Program to eligible homebuyers.   | <p><b>Implementation Status:</b> The time frame on this program is continuous throughout the planning period. On December 8, 2015 the City Council adopted Resolution No. 2015-103, to continue participating with the County of Riverside Mortgage Credit Certificate (MCC) Program.</p> <p><b>Continued Appropriateness:</b> The Riverside County MCC program provides for a 15% rate which can be applied to the interest paid on the mortgage loan the borrower can claim a tax credit equal to 15% of the interest paid during the year. The City will continue to provide referral information regarding the MCC program. On the City website, at City Hall and other public locations. This program is carried into the Housing Element as Program 14.</p>   |



| Program | Program Name  | Objectives  | Progress and Continued Appropriateness  |
|---------|---|---|---|
| 9       | Fair Housing Services   | Continue to work with the County of Riverside to provide fair housing services to residents of Banning.       | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of the program implementation is ongoing, information is made available at the public counter regularly.</p> <p><b>Continued Appropriateness:</b> Banning is not an “entitlement city” and works cooperatively with the County of Riverside, which provides fair housing services to all unincorporated areas of the county and non-entitlement cities. Fair housing services offered through the county include counseling and information on potential discrimination and landlord/tenant problems; special assistance for ethnic minorities and single parent household; and bilingual housing literature. Information regarding available services from the county will be provided at City Hall, on the City website, and at other governmental offices within the city. In addition, the City will work cooperatively with the County of Riverside to distribute fair housing information annually.</p> <p>The services provided by Banning residents have utilized Fair Housing Council of Riverside County (FHCRC) to address numerous tenant and landlord disputes. FHCRC helped to resolve 271 cases that included evocation, affordable housing, harassment, and eviction in the 2020 calendar year. This program is carried into the Housing Element as Program 25.</p> |
| 10      | Reasonable Accommodation in Housing for Persons with Disabilities | Continue to process requests for reasonable accommodation in conformance with State law and Development Code. | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of the program implementation is ongoing.</p> <p><b>Continued Appropriateness:</b> Both the Federal Fair Housing Act and the California Fair Employment and Housing Act require local governments to make reasonable accommodations (i.e. modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. The Zoning code establishes administrative procedures for reviewing and approving such request in conformance with State law. The City will continue to implement this ordinance.</p> <p>FHCRC provides fair housing services for Banning, FHCRC assists includes working with residents and property to address upgrades based on a physical disability. In 2020, FHRC assisted one Banning resident with a physical disability. This program is carried into the Housing Element as Program 8.</p>   |

| Program | Program Name                    | Objectives   | Progress and Continued Appropriateness  |
|---------|---------------------------------|--|---|
| 11      | Residential Energy Conservation | Work Cooperatively with property owners, utility companies and other government agencies to reduce energy use in residential developments. | <p><b>Implementation:</b> The time frame on this program is continuous throughout the planning period. The status of the program implementation is ongoing. The City Council adopted Ordinance 1490, to expedite the permitting procedures of small residential rooftop solar systems; therefore, lowering the cost of solar installation and further expand the accessibility of solar, to meet the requirement of this program and comply with AB 2188, which provides for a streamlined permitting process for residential rooftop solar energy systems. The Utility's Public Benefits Department administers a wide variety of Energy Efficiency Programs. These programs include rebates for purchasing or installing energy efficient items, conducting energy audits for customers, and educating our customers on how to conserve energy. The Public Benefits Department also provides monetary assistance to qualified low-income customers. Also, with the closure of the San Juan Unit 3 Coal Plant in December 2017, the Utility no longer has a Cap &amp; Trade compliance obligation for importing "dirty" electricity. However, the Utility will still receive its allotment of Cap &amp; Trade allowances through 2020, which the Utility can sell for additional revenue. After 2020, the Utility will still receive free allowances. However, the number of free allowances will decline.</p> <p><b>Continued Appropriateness:</b> With the adoption of AB 32, California's greenhouse gas legislation, energy conservation is growing concern. In addition to helping to mitigate greenhouse gas emissions, residential energy efficiency can reduce home heating and cooling costs.</p> <ol style="list-style-type: none"> <li>Support the use of innovative building techniques and construction materials for residential development, such as energy efficient building that utilized solar panels and sustainable building materials that are recyclable.</li> <li>Encourage maximum utilization of Federal, State, and local government programs, such as the County of Riverside Home Weatherization Program and the Western Riverside council of Governments (WRCOG) HERO program, that assist homeowners in providing energy conservation measures.</li> <li>Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects.</li> <li>Encourage energy conservation devices including but not limited to lighting, water heater treatments, solar energy systems for all residential projects.</li> </ol> <p>This program is carried into the Housing Element as Programs 20 and 21.</p> |

## 6 Housing Plan

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The Housing Plan identifies the City's housing goals, policies, and implementation programs. The overall strategy is to present a balanced and diverse array of policies that cover four overall areas of concern: construction, rehabilitation, conservation, and administration. The goals and policies of the Housing Element are organized into concise goal and policy directives.

### 6.1 Goals and Policies

#### **Conserving and Improving Existing Housing**

Substandard and deteriorating housing units, in addition to the obvious problems of blight and appearance, can expose occupants to a variety of hazards ranging from electrical fire to toxic substances and materials used in construction. A number of factors affect the life expectancy of a housing unit, such as quality of workmanship, age of structure, location, type of construction, and degree of maintenance. As a city with a large number of older housing units, it is important that on-going maintenance programs are implemented in Banning. In addition to rehabilitation efforts, conservation of the existing stock of affordable housing is also important, as the cost to preserve existing affordable housing is often lower than replacing the units.

**Goal 1.0: Promote the maintenance and preservation of the City's existing housing stock.**

- Policy 1.1:** Encourage the revitalization of the existing housing stock through rehabilitation programs.
- Policy 1.2:** Continue to establish and enforce property maintenance regulations that promote the sound maintenance of property and enhance the livability and appearance of residential areas.
- Policy 1.3:** Promote the development of attractive and safe housing to meet community needs.

#### **Housing Production**

Economic forces are driving jobs and housing development eastward in Riverside County, which results in increased pressure in Banning for new housing opportunities. The Southern California Association of Governments (SCAG) identified a need for 1,673 new housing units in Banning during the 2021-2029 planning period. New housing developments should provide a range of housing types and price levels to accommodate housing for Banning residents at all income levels.

**Goal 2.0: Provide adequate sites for new residential construction to meet the needs of all segments of the community without compromising the character of the City.**

- Policy 2.1:** Provide adequate sites for a range of new housing construction to meet the Regional Housing Need Assessment (RHNA) for Banning of 1,673 units during the 2021-2029 planning period.
- Policy 2.2:** Support the development of housing affordable to all income groups by utilizing a variety of public and private efforts.

**Policy 2.3:** Promote specific plans that provide a variety of housing types and densities based on the suitability of the land, including the availability of infrastructure, the provision of adequate City services and recognition of environmental constraints.

**Policy 2.4:** Promote the development of attractive and safe housing to meet community needs.

## **Housing for Persons with Special Needs**

New construction is a major source of housing for prospective homeowners and renters. However, the cost of new market-rate construction may not provide housing that is affordable or adequate for special needs populations such as the elderly, persons with disabilities, and persons experiencing homelessness. Incentive programs (financial and regulatory) can support cost-effective means of promoting affordable housing development that meets the needs of all segments of the community.

**Goal 3.0:** Promote and preserve suitable and affordable housing for persons with special needs, including large families, single parent households, persons with disabilities, and seniors and shelter for the unhoused.

**Policy 3.1:** Assist the development of housing that addresses the needs of special populations, including the elderly, persons with disabilities, and persons experiencing homelessness.

**Policy 3.2:** Promote the development of attractive and safe housing to meet special needs accommodations within the community.

**Policy 3.3:** Encourage the development of rental units with three or more bedrooms to provide affordable housing for large families.

**Policy 3.4:** Work with nonprofit agencies and private sector developers to encourage development of senior housing.

**Policy 3.5:** Encourage the production of assisted living facilities (single-story houses and apartments) for the disabled and the elderly.

**Policy 3.6:** Provide emergency shelter with transitional support for City residents, including disadvantaged groups.

## **Removal of Constraints on Housing Development**

Governmental policies and market conditions can constrain housing development and affect affordability. While the City has little influence on market conditions, certain governmental regulations affecting the maintenance, improvement, and development of housing can be minimized to facilitate new construction.

**Goal 4.0:** Remove governmental constraints to the provision of housing to the greatest extent feasible and legally permissible.

**Policy 4.1:** Promote efficient and creative alternatives to reduce governmental constraints.

**Policy 4.2:** Provide regulatory incentives and concessions for affordable, senior, and special needs housing.

**Policy 4.3:** Streamline the City's development review and approval process to facilitate housing construction while also ensuring that new development meets all applicable standards.

## Equal Housing Opportunities

Housing should be made available to all persons regardless of race, religion, sex, family size, marital status, national origin, color, age, disability, or income. To make adequate provisions for the housing needs of all segments of the community, the City should promote equal and fair housing opportunities for all residents.

### **Goal 5.0: Promote equal opportunity for housing and home ownership throughout the City of Banning.**

- Policy 5.1:** Support efforts to eliminate discrimination in the sale or rental of housing with regard to race, religion, disability, gender, family size, marital status, national origin, or income.
- Policy 5.2:** Continue to further fair housing choices by actively expanding housing opportunities and removing impediments to fair housing.
- Policy 5.3:** Encourage the development or renovation of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.
- Policy 5.4:** Accommodate housing for persons with special needs, including emergency shelters and transitional housing, in compliance with applicable State law.
- Policy 5.5:** Continue to maintain an inclusionary housing policy that applies to condominium developments.
- Policy 5.6:** Explore funding sources for home purchasing assistance for lower income households.

## Sustainable Residential Development

Energy conservation can reduce development cost as well as ongoing utility bills for residents. City housing policies can also promote long-term sustainability through efficient land use and transportation planning to reduce fuel usage and travel cost.

### **Goal 6.0: Promote residential energy conservation and sustainable development.**

- Policy 6.1:** Support energy conservation and sustainable residential development through construction technology and land use planning.

## Fair Housing Practices

To adequately address for the housing needs of all economic segments of the community, the City must ensure equal and fair housing opportunities that are available to all residents.

### **Goal 7.0: Promote Fair Housing Practices**

- Policy 7.1:** Provide fair housing services to Banning residents and assure that residents are aware of their rights and responsibilities regarding fair housing.
- Policy 7.2:** Implement the action items identified in the Regional Analysis of Impediments to Fair Housing Choice (AI) to further access to fair housing in Banning.

## 6.2 Housing Programs

The goals and policies contained in the Housing Element address the identified housing needs in Banning and are implemented through a series of housing programs. Housing programs define the specific actions the City will take to achieve specific goals and policies. Housing programs include the programs currently in operation in the City as well as new programs. This section provides a description and the qualitative and quantitative objectives for each housing program the 2021-2029 period.

### Conserving and Improving Existing Housing

#### *Program 1 Code Enforcement*

The City will identify potential code violations, utilize property maintenance inspections, and work with property owners to resolve code and property maintenance issues to maintain the quality of housing units in the City. (The City's Code Enforcement and Building Safety departments work together to actively and efficiently address code violations and improve communication with owners of properties in need of improvement.)

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| <b>Funding:</b>            | Community Development Department  |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Decrease the number of unresolved code violations within the City by 20 percent and increase the number of improved properties by 2029.</li> <li>▪ Beginning 2025, provide annual trainings during the 6<sup>th</sup> Cycle Housing Element planning period to improve capacity of building and code enforcement staff to work with diverse communities, in a culturally competent manner with a focus on problem solving and with connections to social and economic support services.</li> <li>▪ Beginning 2025, partner with local and regional agencies to disseminate housing and public health information and resources such as rehabilitation standards, preventative maintenance, and energy conservation measures in various community locations such as City Hall and the Banning Library.</li> </ul> |
| <b>Timeframe:</b>          | This program will be monitored annually and implemented on an ongoing basis through the remainder of the planning period. Begin annual trainings and dissemination of housing resources and information in 2025.  |

#### *Program 2 Housing Rehabilitation Program*

The City will continue to pursue grant programs for housing rehabilitation and promote home improvement grants such as the Riverside County Home Improvement Program, to support eligible lower-income families as they pursue necessary home repair and rehabilitation work, including room additions to alleviate overcrowding. The City will continue to publicize assistance offered by the County, including flyers available at the City Planning counter and information posted on the City's website. The City will prioritize funding as it becomes available to target projects benefitting extreme-low-income households.

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| <b>Funding:</b>            | State/Federal Grants  |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Assist 80 households during the planning period, with an average of 10 households annually, prioritizing Downtown Banning and East Banning in Census Tracts 441.01 and 442 (areas of lower-income households and at risk of displacement).</li> <li>Continue to provide community outreach regarding available loans and grants for needed home improvements.</li> <li>Seek funding to assist local property owners/managers operating rental housing in need of rehabilitation. The goal of this action is to preserve “naturally occurring affordable housing”. Focus of program resources will be advanced using principles to Affirmatively Further Fair Housing. Apply for, or assist with applications for, at least two funding grants during the planning period.</li> </ul> |
| <b>Timeframe:</b>          | Assist 10 households each year during the 2021 – 2029 planning period. Community outreach will be conducted via multimedia campaigns and workshops, the first of which shall occur by June 2024 and then annually thereafter. Apply for, and assist with, at least two applications for funding for local property owners or managers to rehabilitate rental housing, with priority to units that accommodate lower-income households. The City has hired a full-time permanent Public Information Officer who will assist in this effort.  |

### *Program 3 Neighborhood Improvements*

This program consists of public improvements such as streets, curbs, gutters, and water lines in addition to the Graffiti Removal Program. Important to a successful housing preservation program is the borrowers’ desire to make improvements. Most property owners will make further investments in their property if they believe that there is an optimistic future for the neighborhood where the property is located and that investment in their property will be matched by other owners. The City will continue to develop methods designed to increase the City’s collective sense of community pride.

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| <b>Funding:</b>            | CDBG  |
| <b>Responsible Agency:</b> | Administrative Services Department, Public Works Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Continued implementation of neighborhood public improvements, property maintenance ordinance, design review, and historical preservation ordinance. Prioritize investments in public facility and infrastructure projects that improve the quality of life for residents in Downtown Banning and the neighborhood east of N. San Gorgonio Avenue and north of I-10, with input from community members and stakeholders. Apply for at least two grants for public works improvements in these neighborhoods during the planning period.</li> <li>Apply for at least two neighborhood improvement grants by 2029.</li> </ul> |
| <b>Timeframe:</b>          | This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.   |

## Housing Production

### *Program 4 Residential Sites Inventory and Rezone Program*

Through zoning and general plan designations, the City maintains a residential sites inventory that is adequate to accommodate the City's remaining share of regional housing needs. The City's RHNA is 1,673 households (317 very low-income units, 193 units for low income, 280 units for moderate income, and 883 units for above moderate income). Future residential growth is expected to primarily be infill development in areas where transit-oriented development and access to services is most feasible.

To accommodate the shortfall of lower-income RHNA of 510 units, the City will undergo a General Plan amendment and zoning change amendment to develop standards for the VHDR zone with a minimum density of 20 du/acre and maximum of 30 du/acre by October 2023. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to Government Code section 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households (Appendix B). Sites must be of sufficient size to accommodate 16 units per site.



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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department/Planning   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ By October 2023, change the land use and zoning designations of properties identified as proposed VHDR zone in Appendix B to address any shortfall of sites to accommodate the City’s remaining RHNA requirements.</li> <li>▪ By February 2024, amend the allowable density of the VHDR zone to a minimum of 24 units per acre and a maximum of 30 units per acre to accommodate at least 501 units of multi-family housing for lower income households.</li> <li>▪ Maintain an ongoing inventory of multi-family residential and mixed-use sites and provide updated information on sites on City website.</li> <li>▪ Maintain an ongoing inventory of City-owned properties and other surplus sites owned by other public agencies that may be appropriate for residential uses (see Program 29).</li> <li>▪ Continue to update the Infill Affordable Housing Map to indicate suitable infill development sites.</li> <li>▪ Provide residential sites information to interested developers.</li> <li>▪ Coordinate public improvements in areas where residential development is anticipated to facilitate revitalization, such as neighborhoods north of W. Ramsey Street and in neighborhoods with sites that will be rezoned to VHDR.</li> </ul> |
| <b>Timeframe:</b>          | Change zoning designations of proposed VHDR properties by October 2023 (completed). Change General Plan land use designations for VHDR properties by February 2024. Remaining program elements should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.   |

#### *Program 5 Residential Sites Monitoring Program*

In 2017, Senate Bill 166 (SB 166), otherwise known as “no net loss,” was passed to ensure that cities and counties “identify and make available” additional adequate sites if a housing project is approved at a lower density or with fewer units by income category than what is identified in the Housing Element. In conjunction with Program 7 Residential Sites Inventory, the City will implement a monitoring program that evaluates the current capacity of housing sites for all income levels throughout the duration of the planning period and tracks the City’s available housing sites through its internal database to ensure the City remains on track towards satisfying its RHNA target.

Should an approval of development result in fewer units than assumed in this Housing Element for meeting RHNA requirements (for lower-, moderate-, or above moderate-income households), the City will identify and, if necessary, rezone sufficient sites within 180 days to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department/Planning   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Maintain an updated inventory of residential housing developments that have been submitted, approved, and denied.</li> <li>▪ Actively promote, through outreach and discussions, sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.</li> <li>▪ Amend the Zoning Ordinance by February 2024 to allow, by right, a mix of dwelling types and sizes, specifically missing middle housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) within lower density City residential designations.</li> <li>▪ To comply with Government Code Section 65583, the City will also amend the Zoning Code by February 2024 to allow by-right approval for housing developments that include at least 20 percent of units as affordable to lower-income households on non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing element inventories.</li> <li>▪ Annually monitor the City's remaining housing capacity to ensure compliance with SB 166.</li> <li>▪ Monitor the consumption of residential acreage to ensure an adequate inventory and buffer of residential units is available if sites on the residential inventory are not developed with low and moderate-income residential units and rezone additional properties if sites fall below the low and moderate income RHNA allocation. The City will periodically monitor sites. In the event that sites that are identified for lower- or moderate-income RHNA develop with fewer units than assumed in the inventory, the City will prioritize its buffer allocation to accommodate any shortfall.</li> <li>▪ Rezone non-conforming single-family homes that are non-conforming based on the underlying zoning designation. This will allow for the preservation of 63 non-conforming homes that are zoned for non-residential uses. To be completed by February 2024.</li> </ul> |
| <b>Timeframe:</b>          | Outreach and discussion opportunities regarding sites available for lower and moderate-income housing development shall occur before December 15, 2023. Amendments of the Zoning Ordinance shall occur by February 2024. Remaining program elements should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.  |

### *Program 6 Lot Consolidation and Infill Development*

Where feasible, the City encourages infill development and lot consolidation in order to allow for more flexibility in possible land uses, building designs, and site and parking lot layouts, while minimizing curb cuts and ingress and egress points into parking areas to encourage the smooth flow of traffic. The City encourage development through ongoing communication with developers and

offering development incentives for lot consolidation for multi-family and mixed-use projects, prioritizing nonvacant infill sites for redevelopment and sites with VHDR zoning designation (shortfall sites) to reach the minimum size and units required to support housing for low-income households.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Continue to facilitate lot consolidation for multi-family residential and mixed-use developments by providing information and technical assistance to property owners and developers, such as identifying potential “fast track” permitting opportunities, potential funding sources and leveraging financial opportunities, providing an analysis of requirements and incentives, and guiding developers through the review process.</li> <li>▪ Meet with developers to identify and discuss potential project sites for infill, redevelopment, and mixed-use development on an on-going basis. Notify developers when the sites go on sale.</li> <li>▪ Offer incentives for lot consolidation when minimum standards are met (after February 2024 when zoning has been amended to include the development standards for the VHDR zone). Incentives could include reduced development fees, increased allowable density, decreased parking ratio requirements, reduced setbacks, and increased lot coverage and height allowance.</li> </ul> |
| <b>Timeframe:</b>          | This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period. Zoning text amendments to be completed by February 2024.   |

#### *Program 7 Multi-Family Acquisition and Rehabilitation*

In addition to the provision of sites for new construction of affordable housing, an important component of Banning’s housing strategy is the identification of existing multi-family structures for upgrading and maintaining as affordable housing. Numerous older apartment complexes are located in the City, many in substandard conditions, with potential for acquisition and rehabilitation. Acquisition and rehabilitation are more cost effective than new construction of affordable units and provides the additional benefit of improving the stock of substandard multi-family housing in the City. To the extent feasible, the City will encourage a portion of the affordable units to be made available to persons with disabilities (including developmental disabilities) and extremely low-income households.

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| <b>Funding:</b>            | HOME Funds  |
| <b>Responsible Agency:</b> | Administrative Services Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Utilize HOME funds to assist both nonprofit and for-profit developers to acquire existing apartment buildings in need of upgrading, in exchange for long-term affordability controls on some or all of the units.</li> <li>Pursue available funds for multi-family acquisition and rehabilitation to provide at least 10 units of affordable housing.</li> </ul> |
| <b>Timeframe:</b>          | This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.   |

## Housing for Persons with Special Needs

### *Program 8 Housing for Special Needs Populations*

The City will monitor its policies, standards, and regulations to ensure that they do not unduly impact persons with special needs, which includes people who are currently unhoused or at risk for becoming homeless, persons with disabilities, seniors, and persons in need of transitional or supportive housing. The City will also facilitate the development of housing for persons with disabilities and other special needs through incentives for affordable housing development.

The City continues to utilize Community Development Block Grant (CDBG) funds to support a range of services for individuals experiencing homelessness and persons with special needs. Furthermore, the City will continually review the low barrier navigation centers and emergency shelter provisions to comply with recent changes to state law and amend the zoning ordinance. One nonprofit that has assisted in the past includes H.E.L.P Inc. H.E.L.P Inc. is the primary service provider for persons experiencing homelessness in Banning and works with the City to provide food and clothing assistance for qualifying individuals and families. Persons experiencing homelessness in Banning can access programs offered through the County of Riverside, including: the Emergency Food and Shelter Program, the Homeless Management information System, the Continuum of Care for Riverside County, and the Housing and Urban Development Supportive Housing Program.

Banning households who are at risk of becoming homeless as defined by HUD are considered a special needs population. This program aims to continue existing services provided by the County and continue to identify new services that can be added to the County's list of homeless services.

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act require local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. The Zoning code establishes administrative procedures for reviewing and approving such request in conformance with State law. The City will continue to implement this ordinance.

In 2018, Assembly Bill 2162 (AB 2162) was passed which requires that supportive housing be a use by right in zones where multi-family and mixed uses are permitted including nonresidential zones permitting multifamily uses. Additionally, AB 2162 prohibits local governments from imposing any minimum parking requirements for units occupied by supportive housing residents if the development is located within ½ mile of a public transit stop. The City of Banning is committed to expanding supportive housing opportunities for vulnerable communities that rely on such services. The City will amend its Zoning Ordinance to reflect AB 2162 and will continue to seek new

supportive housing opportunities through further analysis of its Residential Sites Inventory. The City will prioritize supportive housing developments near transit centers and foster relationships with supportive housing advocacy partners such as Operation SafeHouse to identify potential opportunities for supportive housing.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Provide administrative assistance to developers seeking available State and federal funding and/or tax credits for the construction of affordable housing.</li> <li>▪ Facilitate projects that incorporate affordable units and accessible units by granting modifications to development standards, expedited processing, or financial incentives consistent with State law.</li> <li>▪ Contact affordable housing developers each year to solicit interest and apprise them of available assistance programs.</li> <li>▪ Prioritize targeted assistance for special needs housing and extremely-low-income (ELI) units through density bonuses and/or regulatory incentives, modified development standards and fee deferrals, when feasible.</li> <li>▪ Coordinate with the Inland Regional Center regarding the needs and assistance programs targeted for persons with developmental disabilities and make information available on the City website.</li> <li>▪ Continue to monitor policies, standards, and regulations and make annual updates to remove identified constraints to development of housing for special needs populations.</li> <li>▪ Facilitate the development of housing for persons with disabilities and other special needs through incentives for affordable housing development, with the goal of developing 16 special needs units over eight years.</li> <li>▪ Coordinate with agencies such as the Housing and Homeless Coalition of Riverside County along with SCAG for the purposes of coordinating efforts, reducing the unsheltered population, increasing emergency and permanent housing, and leveraging resources to address homelessness.</li> <li>▪ Annually monitor policies, standards, and regulations to ensure that they do not unduly impact persons with special needs.</li> <li>▪ Continue to provide funding for local and sub-regional homeless service providers that operate temporary and emergency shelters.</li> <li>▪ Assist (when possible) local non-profits and charitable organizations in securing state and federal funding for the acquisition, construction, and management of shelters.</li> <li>▪ Review the low barrier navigation centers and emergency shelter provisions to comply with recent changes to State law and amend the Zoning Ordinance and other policies to remove constraints to development.</li> </ul> |

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|                   | <ul style="list-style-type: none"> <li>▪ Continue to financially support the 211 system operated by the Volunteer Center of Riverside County. This system provides information on all social services offered in Riverside County.</li> <li>▪ Continue to process requests for reasonable accommodation in conformance with State law and the Development Code.</li> <li>▪ Evaluate the use and effectiveness of the reasonable accommodation ordinance through the annual Housing Element Progress Reports.</li> <li>▪ Continue to provide opportunities for the development of affordable housing for seniors and persons with disabilities.</li> <li>▪ Continue to provide reasonable accommodations by reviewing and approving requests for modifications to building or zoning requirements in order to ensure accommodations for persons with disabilities.</li> <li>▪ Substantially expand City's website on housing resources for persons with special needs, and advertise information via the City's informational outlets (Cable Access Channels, social media, etc.).</li> <li>▪ Nurture ongoing and potential partnerships that help educate and execute the development of supportive and transitional housing. Have at least one discussion with Operation SafeHouse or similar organization at least once annually.</li> <li>▪ Amend the zoning ordinance to allow supportive housing in multi-family and mixed-use zones by right, and that the zoning ordinance permits group homes objectively with approval certainty, by February 2024.</li> <li>▪ Amend the ordinance to allow group homes in all residential zones to be permitted similar to other residential uses in the same zone, by February 2024.</li> <li>▪ Amend the zoning ordinance by February 2024 to reflect the change to parking requirements for units occupied by supportive housing residents if the development is located within ½ mile of a public transit stop.</li> <li>▪ Monitor State law to ensure regulatory compliance to facilitate housing for people experiencing homelessness and residents with special needs.</li> </ul> |
| <b>Timeframe:</b> | Amendment of the Zoning Ordinance and update of the City's webpage shall occur by February 2024. The remaining elements of this program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.   |

## Removal of Constraints on Housing Development

### *Program 9 Zoning Ordinance Monitoring*

This program actively monitors the City's Zoning Ordinance to ensure that standards do not excessively constrain affordable residential development or the development of emergency, transitional, and supportive housing. The Banning Zoning Ordinance is continuously updated to

address changes among a range of issues and State/federal laws. To comply with AB 139, the City will amend its zoning ordinance to permit emergency shelters by-right in the Public Facility zone. This zone is the most appropriate for this type of development given the amount of land available for emergency shelter uses, and proximity to services and public transit. The City will continue to monitor its policies, standards, and regulations to ensure they work to facilitate residential and mixed use development in the community. The City will also revisit its regulations on transitional and supportive housing, emergency shelters, residential care facilities, and ADUs.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Monitor the City's Zoning Ordinance to ensure standards do not excessively constrain affordable residential development.</li> <li>▪ Review and amend the Zoning Ordinance by February 2024 to ensure emergency shelters are permitted by right (without discretionary action) in the Public Facility zone. Amend definition of emergency shelters and meet requirements pursuant to AB 2339.</li> <li>▪ Conduct a Zoning Text Amendment (ZTA) to revise parking requirements for emergency shelters in compliance with AB 139 by February 2024.</li> <li>▪ Amend the Zoning Ordinance by October 2024 to comply with AB 139 to ensure standards only require parking sufficient for employed staff and do not require parking for emergency shelters than other residential or commercial uses within the same zone.</li> <li>▪ Amend the Zoning Ordinance by February 2024 to comply with AB 101 to permit low barrier navigation centers and residential care facilities by right in areas zoned for mixed-use and nonresidential zones permitting multi-family housing.</li> <li>▪ Amend the Zoning Ordinance by December 2024 to permit transitional and supportive housing as a residential use in all zones allowing residential and only subject to the requirements of residential uses of the same type in the same zone pursuant to Government Code 65583(c)3.</li> <li>▪ Amend the Zoning Ordinance by December 2024 to comply with AB 2162 to permit by-right permanent supportive housing without discretionary action in zones allowing multi-family uses pursuant to Government Code 65651.</li> <li>▪ Amend the Zoning Ordinance by February 2024 to comply with the Employee Housing Act to accommodate farmworker housing in RA and RA-H zones.</li> <li>▪ Amend the Zoning Ordinance by February 2024 to comply with the most recent ADU legislation.</li> <li>▪ Amend the Zoning Ordinance by February 2024 to remove subjective text seen as a constraint to the development of residential care facilities.</li> <li>▪ Amend the Zoning Ordinance by February 2024 removing reasonable accommodation findings related to character and sensitivity of neighborhoods.</li> </ul> |

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|                   | <ul style="list-style-type: none"> <li>Remove the Conditional Use Permit requirement for single-resident occupancy (SRO) developments in the Zoning Ordinance by February 2024.</li> </ul> |
| <b>Timeframe:</b> | The monitoring program will be implemented on an ongoing basis through the remainder of the planning period. Amendments to the Zoning Ordinance to occur by February 2024.                 |

### *Program 10 Flexibility in Development Standards*

The City, in its review of development applications, may recommend waiving or modifying certain development standards, or propose changes to the Municipal Code to encourage the development of low- and moderate-income housing. The City offers offsets to assist in the development of affordable housing citywide in the form of concessions or assistance including, but not limited to, direct financial assistance, density increases, standards modifications, or any other financial, land use, or regulatory concession that would result in an identifiable cost reduction.

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints, including but not limited to flexibility is building setbacks, increased lot coverage, reduced parking requirement if within 0.5 miles of transportation stops, etc. in order to enhance the feasibility of affordable housing, while maintaining the quality of housing.</li> <li>Amend the Zoning Ordinance by February 2024 to remove the two-acre minimum currently required for multi-family development in MDR zones.</li> </ul> |
| <b>Timeframe:</b>          | Amendment of the Zoning Ordinance shall occur by February 2024. Review Development Code at least once annually and implement recommended changes within one year of review.   |

### *Program 11 Development Fees*

Various fees and assessments are charged by the City to cover the costs of processing permits and providing services and facilities. While almost all these fees are assessed on a pro rata share system, they often contribute to the cost of housing and constrain the development of lower priced units. As a result, the City will evaluate the impact of the fee increase on residential and mixed-use developments as a potential constraint on housing development and adjust as necessary to encourage and facilitate residential development. In addition, the City will work with the development community to solicit input on the impact and viability of existing fees. The City updates its Fee Schedule every two years by the City's Finance Department.



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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Banning City Council   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Annually assess the progress made regarding meeting residential development goals and evaluate the impact of fees on residential and mixed-use developments through outreach with developers and adjust development fees as necessary to facilitate and encourage development activities.</li> <li>▪ If feasible and appropriate, offer financial assistance to affordable housing projects to offset the cost impact of development fees.</li> </ul> |
| <b>Timeframe:</b>          | Assess progress on residential development goals each year in the 2021 – 2029 planning period. This program will be monitored annually and will be implemented on an ongoing basis through the remainder of the planning period.   |

### *Program 12 Expedited Review and Permit Processing*

The City continues to improve the efficiency of the development review process. As a response to a housing shortage in the State of California, Senate Bill 330 (SB 330) was passed to restrict local rules that limit housing production. SB 330 strengthens the Permit Streamlining Act by creating a more efficient two-step application process. The City prioritizes review and processing for projects that include units for extremely low-income households and persons with disabilities (including developmental disabilities). The City has an expedited permit review page on the Building Division's webpage with applications and guidelines for expedited building permits. Additionally, in conformance with Government Code Section 65940.1 (SB 1483), the City has all schedule of fees, application forms, Zoning Ordinance/Municipal Code, and other relevant information publicly accessible on the City's website. The City will continue to find ways to make the development process more efficient and uphold SB 330 by further streamlining the permit process and directly coordinating with developers to ensure a timely application and development process. In accordance with new transparency requirements, the City of Banning will continue to post all zoning, development standards and fees on the City's website.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department/Planning  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Continue to monitor and improve the project review and approval process.</li> <li>▪ The City shall establish and adopt clear and objective design standards for multi-family and mixed-use housing projects by <b>February 2025</b>.</li> </ul> |
| <b>Timeframe:</b>          | Objective and design standards shall be adopted by <b>February 2025</b> . Monitoring and improving the project review and approval process will be implemented on an ongoing basis through the remainder of the planning period.   |

## Affordable Housing Development and Assistance

### *Program 13 Down Payment Assistance Program (DAP)*

The City's DAP is a First-Time Homebuyer Down Payment Assistance Program that provides one percent (up to \$20,000) of purchase price towards a down payment. Applicants are required to take an approved first-time homebuyer class. Additionally, the DAP funds a portion of the Qualified Borrower's QSFR Purchase Price. Any single-family residence that is purchased through the DAP must be affordable to persons of extremely low to low income and borrowers must meet all eligibility criteria as they may be amended from time to time. The City will continue the DAP in an effort to continue the promotion of assisting very low and low-income households.

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| <b>Funding:</b>            | Department Budget, Banning Housing Authority  |
| <b>Responsible Agency:</b> | Community Development Department/Planning   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Utilize DAP funding to provide assistance to 40 very-low and low-income households throughout the City during the planning period.</li> <li>Annually conduct a multimedia campaign (i.e., social media) to encourage residents throughout the City to learn about the DAP program. The first campaign is to be completed by the end of December 2025.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period. The first campaign is to be completed by the end of December 2025.   |

### *Program 14 Mortgage Credit Certificate Program*

A Mortgage Credit Certificate (MCC) entitles qualified home buyers to reduce the amount of their federal income tax liability by an amount equal to a portion of the interest paid during the year on a home mortgage. This tax credit allows the buyer to qualify more easily for a loan by increasing the effective income of the buyer. The Riverside County MCC program provides for a 15 percent rate which can be applied to the interest paid on the mortgage loan the borrower can claim a tax credit equal to 15% of the interest paid during the year. Since the borrower's taxes are being reduced by the amount of the credit, this increases the take-home pay by the amount of the credit. The buyer takes the remaining 85 percent interest as a deduction. When underwriting the loan, a lender takes this into consideration and the borrower can qualify for a larger loan than would otherwise be possible.

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| <b>Funding:</b>            | Federal Tax Credits, Riverside County Economic Development Agency (EDA)   |
| <b>Responsible Agency:</b> | Riverside EDA   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Provide information regarding the MCC Program to eligible home buyers.</li> <li>▪ Coordinate proactively with Riverside County on annual monitoring of the effectiveness of the MCC program.</li> <li>▪ Annually conduct a multimedia campaign (i.e., social media) to encourage residents to learn about the MCC Program. The first campaign is to be completed by the end of December 2025.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period. The first campaign is to be completed by the end of December 2025.   |

#### *Program 15 Section 8 Rental Assistance*

The Section 8 Rental Assistance Program provides rental subsidies to very-low-income (up to 50 percent of area wide median income [AMI]) family and elderly households who spend more than 30 percent of their income on rent. The subsidy represents the difference between 30 percent of monthly income and the actual rent. Section 8 assistance is issued to the recipients as vouchers, which permit tenants to choose their own housing and rent units beyond the federally determined fair market rent in an area, provided the tenant pay the extra rent increment. This program will continue to administer Section 8 housing choice vouchers and provide additional assistance to very low-income households. The City will apply for additional Section 8 Housing Choice Vouchers when HUD makes it available and will also seek other funding sources.

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| <b>Funding:</b>            | Federal HUD Section 8   |
| <b>Responsible Agency:</b> | Housing Authority of Riverside County (HARIVCO)   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Continue to support the HARIVCO's applications for additional Section 8 allocations and efforts to provide vouchers for lower-income residents throughout the City (with the objective of 10 percent more residents using vouchers in the City over 2021 baseline number).</li> <li>▪ Apply for additional Housing Choice Vouchers when made available by HUD.</li> <li>▪ Proactively seek additional funding that can be used, in addition to Section 8 funds, to provide subsidies to lower-income households.</li> <li>▪ Annually conduct a multimedia campaign (i.e., social media) to encourage residents throughout the City to participate Section 8 Rental Assistance. The first campaign is to be completed by the end of December 2025.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period. The first campaign is to be completed by the end of December 2025.   |

### Program 16 Affordable Housing Development

The City is committed to maintaining and monitoring housing conditions amongst vulnerable, very low-income, low-income, and special needs populations. Lower-income communities along with the elderly and persons with special needs are disproportionately burdened with poorer housing conditions. Banning will continue to seek new funding opportunities and partnerships to improve housing conditions. The City will identify and partner with advocacy groups such as Habitat for Humanity to expand existing resources and help further improve housing conditions for special needs and low-income communities and identify the need for rehabilitation assistance as the housing stock ages. Habitat for Humanity builds affordable homes by partnering with local housing commissions and other developers. Habitat for Humanity of the San Geronio Pass Area serves Banning and currently owns and operates two new homes in Banning. This program aims to facilitate affordable housing production or self-help housing development through assistance in the site identification and acquisition, priority processing, collaboration with non-profit or other developers, as well as explore incentives and additional funding sources.

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| <b>Funding:</b>            | CDBG and HOME funds   |
| <b>Responsible Agency:</b> | Administrative Services Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Facilitate affordable housing production or self-help housing development through assistance in site identification and acquisition, priority processing, collaboration with nonprofit or other developers, as well as provision of incentives.</li> <li>Continue to utilize funds to expand affordable housing projects that target and address special needs populations with the goal of facilitating the development of 80 units affordable to extremely low-income residents throughout the City over eight years.</li> <li>Annually seek additional funding sources and identify new partnerships to greater expand resources in the city.</li> <li>Monitor both the City's and State's development code for any additional updates that will require housing in the City to be altered/changed to comply with the latest updates.</li> <li>Investigate funding opportunities to provide rehabilitation services to 10 homeowners and/or property owners/managers in vulnerable and low-income communities throughout the City, prioritizing Downtown Banning and East Banning. Priority will be given to repair and rehabilitation of housing identified by the City's Building Division as being substandard or deteriorating, and which houses lower-income, and in some cases, moderate-income households.</li> <li>By October 2025, update the City's housing webpage with more information on the incentives available for the construction of new residential units, such as density bonus law information, development impact fee waiver and deferral process, sites already zoned for higher density housing to support lower and moderate-income units, information on development standards, streamline plan review, etc.</li> <li>Work with water and sewer providers to ensure written policies for priority for water and sewer service allocations to proposed</li> </ul> |

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|                   | developments that include housing units affordable to lower-income households.   |
| <b>Timeframe:</b> | This program will be monitored annually and implemented on an ongoing basis through the remainder of the year. By October 2025, update the City's housing webpage. Assist at least three for-profit or non-profit developers with funding applications for affordable housing development by January 2027. |

#### *Program 17 Density Bonus Program*

Consistent with State law (Government Code sections 65915 through 65918), the City continues to offer residential density bonuses as a means of encouraging affordable housing development. The City's density bonus regulations (Municipal Code Chapter 15.60) will be amended to incorporate all recent changes to State density bonus law including the latest density bonus legislation AB 2345. The purpose of the program is to provide incentives to the private sector to build very low- and low-income housing, donate land, or build housing for seniors and the disabled, by increasing the number of units above that normally permitted by the zoning.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Update the Banning Zoning Ordinance / Municipal Code by February 2024 to integrate future changes in State Density Bonus Law, including update to reflect the requirements of AB 2345 (2020).</li> <li>Continue to advertise and inform prospective developers of options for density bonuses, and actively educate and promote density bonus increases as adopted.</li> <li>Meet with developers to discuss incentives and concessions appropriate for the density bonus program to facilitate affordable housing development.</li> <li>Promote the use of density bonus incentives by providing information on City website and offering technical assistance to developers through the Fast Track program and providing staff resources without additional costs to the developers.</li> </ul> |
| <b>Timeframe:</b>          | This program should be monitored annually to identify any new density bonus legislation and amend the Zoning Ordinance and should be implemented on an ongoing basis through the remainder of the planning period.   |

#### *Program 18 Safe and Healthy Communities Program*

The City of Banning is committed to reducing the barriers of housing to vulnerable populations due to environmental hazards. Communities of color and lower-income communities are often disproportionately burdened with poor housing conditions due to a variety of environmental threats and hazards. Under California Government Code 65040, environmental justice is designed as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” The

City is committed to expanding safe and healthy housing opportunities for people of all groups through the continuous expansion of environmental justice policies, conducting thorough environmental review of all housing developments, and creating partnerships with environmental justice agencies and advocates such as the California Environmental Justice Alliance.

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Annually monitor policies, standards, and regulations regarding environmental justice in the City.</li> <li>Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people. Have at least one conversation with neighborhood groups from neighborhoods with higher LMI percentages and lower CalEnviroscreen scores, and/or the California Environmental Justice Alliance or similar organization at least once annually. Neighborhoods include central, southern, and eastern Banning.</li> <li>Apply for a minimum of 3 funding applications by January 2027 to support placemaking activities and/or infrastructure improvements in central, southern, and eastern Banning during the planning period.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period.  |

#### *Program 19 Alternative Housing Program*

Under this program, the City will continue to support alternative types of housing, such as multifamily units, single-room occupancy units, and managed living units or “micro-units,” to accommodate extremely-low-income households.

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Continue to annually monitor underutilized properties and sites that have a potential for alternative housing options and offer the information to interested developers on an on-going basis, prioritizing areas with higher rates of lower-income households such as Downtown Banning and East Banning.</li> <li>Consider rezoning underutilized commercial, office, and or industrial space, as appropriate, to facilitate use for alternative housing types.</li> <li>Develop, as part of a zoning ordinance update, measures that encourage affordability by design (e.g., smaller, more efficient and flexibly-design living spaces).</li> <li>Where appropriate, utilize the City’s regulatory powers (e.g., land use and fees) to encourage development of alternative housing including care facilities for 7+ individuals in residential zones.</li> </ul> |

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|                   | <ul style="list-style-type: none"> <li>▪ Evaluate and implement a development fee structure for <b>shared or micro</b>-units based on a per square foot basis rather than per unit basis.</li> <li>▪ Encourage innovative housing structures, such as micro-unit housing and new shared and intergenerational housing models to help meet the housing needs of aging adults, students, and lower-income individuals citywide. <b>Provide technical and financial assistance to support the development of innovative housing types (SROs, co-operating housing, or tiny homes) to serve at least five households with special housing needs by 2029.</b></li> </ul> |
| <b>Timeframe:</b> | This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.   |

## Sustainable Residential Development

### *Program 20 Energy Efficiency Rehabilitation Program (Small)*

Banning Housing Authority's (BHA) Energy Efficiency Rehabilitation Program (EERP) is to provide grants of up to \$2,000 or forgivable loans of up to \$5,000 to homeowners of single-family detached dwellings for the performance of energy efficiency home assessments and eligible home improvements that increase energy and water efficiency of their home. Grants and forgivable loans shall be provided to eligible extremely low, very low, and lower income homeowners of owner-occupied single-family detached homes to cover the cost of approved energy efficiency rehabilitation repairs. The two options under the EERP are below:

- Grant option: One time, per homeowner, per residence limit.
- Forgivable loan option: Loan may be forgiven after five years of occupancy. If home is sold before term, loan is due, payable to the Agency.

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| <b>Funding:</b>            | Department Budget, Banning Housing Authority   |
| <b>Responsible Agency:</b> | Community Development Department/Planning  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Assist 20 extremely low, very low, and low-income homeowners with small home loans for establishing energy efficiency measures and executing rehabilitation repairs by the end of the planning period.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period.   |

### *Program 21 Energy Efficiency and Minor Home Repair (Big)*

The purpose of the Banning Housing Authority's (BHA) Energy Efficiency and Minor Repairs Program (EEMRP), also considered to be minor home repair, is to assist extremely low, very low, and lower income homeowners, whose incomes do not exceed 80 percent of the Area Median Income (AMI) adjusted by family size, as established by the California Department of Housing and Community Development (HCD), by providing forgivable loans of up to \$10,000 to make energy efficiency related repairs to their single family owner-occupied residences within the City of Banning.

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| <b>Funding:</b>            | Department Budget, Banning Housing Authority  |
| <b>Responsible Agency:</b> | Community Development Department/Planning   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Assist at least 8 extremely low, very low, and low-income homeowners with larger home loans for establishing energy efficiency measures and executing rehabilitation repairs by the end of the planning period.</li> </ul> |
| <b>Timeframe:</b>          | This program will be implemented on an ongoing basis through the remainder of the planning period.  |

### *Program 22 Sustainable Building*

The City promotes the use of sustainable building techniques for new and rehabilitation projects in order to reduce demand for water and energy, shorten commute distances, protect the environment, reduce operational costs of ownership, and plan large development projects with environmental principles such as transit-oriented development. The program will continue to implement sustainable building and design in new construction throughout the City.

In accordance with Title 24 of the California Code of Regulations, the City will continue to facilitate voluntary energy efficiency improvements and upgrades in existing residential, commercial, and industrial buildings within the City.

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| <b>Funding:</b>               | Department Budget  |
| <b>Responsible Agency:</b>    | Community Development Department/Planning  |
| <b>Objectives and Timing:</b> | <ul style="list-style-type: none"> <li>Continue to enforce the California Energy Code and CALGreen Code through the development review process.</li> <li>Provide information and forms on the City's website to facilitate project compliance with the CALGreen Code and the City will provide informational forms/pamphlets on the CALGreen Code to project applicants beginning January 2025.</li> <li>Continue to implement the Climate Action Plan that fosters sustainability in all development requiring discretionary approval.</li> </ul> |
| <b>Timeframe:</b>             | This program will be implemented on an ongoing basis and through the remainder of the planning period.   |

## **Fair Housing Practices**

### *Program 23 Community Outreach*

Community outreach is a key component to developing a comprehensive and inclusive housing market in the City. It is critical to engage local community groups and stakeholders from all sectors of the community in order to educate and provide inclusive housing opportunities. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the City's housing and overall planning process. Strategies to expand accessibility and help further educate community groups include:



- Sharing and distributing public announcements/information through a variety of mediums such as flyers, E-blasts, website updates, new media, and social media;
- Actively monitor existing stakeholders and seek to find additional stakeholders from all sectors of the community to engage in the public participation process;
- Increasing accessibility to public meetings by conducting public meetings at suitable times, having meetings be accessible to persons with disabilities, having meetings be accessible to nearby transit centers, and provide additional resources such as childcare, translation, and food services;
- Ensuring language translation services and access to public engagement opportunities in a variety of languages including Spanish to help reduce language barriers, and;
- Continuing to educate all community groups of the services available for rental, homeownership, and rehabilitation/maintenance services.

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Increase accessibility to public meetings for all sectors of the community, including persons with disabilities, by ensuring public meetings are in locations accessible to all persons and that physically impaired residents can be accommodated upon request.</li> <li>▪ Ensure that public meetings and other planning processes are offered in Spanish as requested.</li> <li>▪ Make public announcements and information accessible and visible in a multitude of ways.</li> </ul> |
| <b>Timeframe:</b>          | This program should be implemented on an ongoing basis through the remainder of the planning period.  |

#### *Program 24 Community Placemaking Pilot Program*

The City of Banning actively seeks to identify new opportunities to bridge the gap between all neighborhoods despite differences in income-levels and demographics. The City seeks to create a unified community while also celebrating the different cultural makeup of individual neighborhoods. The Community Placemaking Pilot Program seeks to connect people and neighborhoods by implementing small-scale placemaking projects/events that people from all community groups can be a part of. Placemaking strategies include but are not limited to:

- Increase signage and wayfinding between neighborhoods;
- Implement “popup parks”/sidewalk cafes in community neighborhoods;
- Create a community murals program to help beautify community neighborhoods and connect local artists of all backgrounds;
- Increase seating, such as picnic tables with chess/checker boards;
- Create a designated city community garden for all members of the community to visit and volunteer;
- Coordinate neighborhood walks/races, and;
- Increase overall community outreach to help spread the word on new community attractions in various neighborhoods and educate community groups on new community activities

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| <b>Funding:</b>            | Department Budget   |
| <b>Responsible Agency:</b> | Community Development Department  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Connect neighborhoods of all income levels and demographic makeup through small placemaking projects and activities accessible to all persons, including persons with disabilities. Complete at least three placemaking activities in eastern, southern, or central Banning by the end of 2028.</li> <li>▪ Expand public outreach to target all neighborhoods and educate people from all types of community groups on new and upcoming neighborhood projects and activities. Engage at least one new neighborhood-based group from the neighborhoods of eastern, central, or southern Banning in neighborhood projects or activities by 2028.</li> <li>▪ Annually examine the need for infrastructure and secure funding for 3 improvement projects over the planning period within the CDBG target area of central and eastern Banning that improves the amenities in neighborhood parks and sidewalk conditions to enhance the quality of life of residents in the LMI designated neighborhoods which is where the majority of housing opportunities will be with implementation of the rezone program.</li> <li>▪ Contact commercial developers and discuss opportunities for the development of a grocery store in East Banning by January 2025. Prepare market analysis to support grocery store development by January 2026.</li> </ul> |
| <b>Timeframe:</b>          | <ul style="list-style-type: none"> <li>▪ This program should be implemented on an ongoing basis through the remainder of the planning period. Engage at least one new neighborhood-based group from the neighborhoods of eastern, central, or southern Banning in neighborhood projects or activities by 2028.</li> </ul>   |

### *Program 25 Fair Housing Services*

AB 686 (2017) requires each city to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. Banning is not an “entitlement city” and works cooperatively with the County of Riverside, which provides fair housing services to all unincorporated areas of the county and non-entitlement cities. Fair housing services offered through the county include counseling and information on potential discrimination and landlord/tenant problems; special assistance for ethnic minorities and single parent household; and bilingual housing literature. Information regarding available services from the county will be provided at City Hall, on the City website, and at other governmental offices within the city. In addition, the City will work cooperatively with the County of Riverside to distribute fair housing information annually.

The City contracts with the Fair Housing Council of Riverside County (FHCRC) for the provision of fair housing services. The FHCRC provides fair housing services to Banning residents, landlords, and interested professionals such as local realtors and lenders. FHCRC provides counseling and dispute

resolution services pertaining to fair housing issues (i.e. discrimination, tenant-landlord rights, etc.) and addresses identified impediments to fair housing choice on behalf of the City. As a partner to the City and other local jurisdictions, the FHCRC has also become involved with foreclosure prevention by conducting community foreclosure prevention workshops and individual housing counseling.

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| <b>Funding:</b>            | Riverside County, Department Budget   |
| <b>Responsible Agency:</b> | Riverside County  |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Continue to invest in Fair Housing Resources through a contract with Riverside Legal Aide (RLA) to support residents who need Fair Housing resources, mitigation, or legal.</li> <li>▪ Continue to effectively address the requirements of AB 686 by increasing outreach and education through the fair housing service providers, publicize fair housing litigation to encourage reporting, and conduct random testing on a regular basis to identify issues, trends, and problem properties.</li> <li>▪ Once a year beginning in 2024, provide information to residents on the services provided by the Fair Housing Council of Riverside County, such as credit counseling, first-time homebuyer resources, and pre-purchase counseling by including informational pamphlet inserts in the City's mailed utility billings. Provide the information both in English and Spanish.</li> <li>▪ Work with local agencies such as the Fair Housing Council of Riverside County to help identify and reduce barriers to housing on both a regional and local scale. Continue to provide CDBG funding to the Fair Housing Council.</li> <li>▪ By February 2024, include on the City's website resources provided by the Fair Housing Council of Riverside County and quick links for easy access to Fair Housing's website.</li> <li>▪ At least once annually in areas of high segregation and poverty (Census Tracts 441.01 and 44 – central and eastern Banning), coordinate with FHCRC to provide free educational workshops (in-person or online) to tenants and landlords on their rights and responsibilities under Fair Housing laws. Consider translation needs, meeting days/times, and other consideration for attendees. The first workshop shall occur by December 15, 2024. The objective is to have at least ten workshop attendees.</li> <li>▪ Conduct bilingual multimedia campaigns for housing related educational events, including social media and printed flyers posted in the common area of large complexes, community centers the Banning Library, laundromats, and other strategic visible strategic locations, prioritizing neighborhoods in Census Tracts 441.01 and 442 (Downtown Banning and East Banning). The first educational event shall occur by December 15, 2024.</li> <li>▪ At least once annually, obtain feedback through workshop surveys, focused discussions, and/or online methods to obtain public input and feedback on fair housing issues. The first instance shall occur on or before December 15, 2024. Objective is to receive feedback from at least 15 participants.</li> </ul> |

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| <b>Timeframe:</b> | This program will be implemented on an ongoing basis through the remainder of the planning period. Update City's website by February 2024. Provide information on fair housing resources starting in 2023. |
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### Program 26 Affirmatively Furthering Fair Housing (AFFH) Program

To address the requirements of AB 686, the City has worked collaboratively with the County of Riverside Public Housing Authority (PHA) to complete the Analysis of Impediments (AI) to Fair Housing which identifies regional barriers to fair housing. The City has also produced a City-specific Analysis of Impediments to Fair Housing that discusses local barriers to fair housing with heavy emphasis on racial and economic disparity and environmental justice. Two primary impediments were identified for the City including a lack of access to home improvement financing and limited access to home purchase loans. In the surrounding Southern California region, Black/African American and Hispanic/Latino households have limited access to conventional home purchase loans due to disproportionate denial rates compared to households of other racial groups. Recommendations have been identified in the City's AI to reduce these impediments including implementing programs such as the Housing Rehabilitation Program and efficiently monitoring HDMA data.

The City continuously examines housing opportunities available within the City and has undertaken Zoning Ordinance amendments to address the impediments identified in the AI. The City will continue to work collaboratively with the County of Riverside Public Housing Authority to identify and promote fair housing, education, and advocacy.

Despite the repeal of explicitly racist and discriminatory housing laws, segregation and resources disparities continue to exist. Housing choice is often limited for persons of protected classes, including minority communities, which leads to concentrated areas of poverty. The City's central and eastern areas, including historically Hispanic/Latino neighborhoods, have suffered from overcrowding, vulnerability to displacement, and lower access to housing resources, as identified in Appendix C. This program is designed to affirmatively reduce barriers to housing, including but not limited to racial inequities, high housing costs, and public awareness of existing resources.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ Implement recommended action items identified in the Analysis of Impediments to Fair Housing Choice for Riverside County by 2026.</li> <li>▪ Encourage affirmative marketing on all residential projects and require developers to advertise to under-represented minority groups to indicate the availability of housing units that meet affordable housing requirements.</li> <li>▪ At least once annually, work with local agencies such as the Fair Housing Council of Riverside County to help identify and reduce barriers to housing on both a regional and local scale.</li> <li>▪ Establish a method of measuring the progress of fair housing practices, which can include the index of dissimilarity, the Regional Opportunity Index, and percentage of residents experiencing extreme housing cost burdens. Report the findings of these metrics as part of the City's Housing Element Annual Progress Report by 2026.</li> </ul> |

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|                   | <ul style="list-style-type: none"> <li>▪ Expand understanding of the current state of fair housing practices and potential areas of discrimination by conducting an in-depth study of fair housing issues around the city, to be completed by 2026.</li> <li>▪ Annually monitor application of Development Code standards for constraints to development of new housing, particularly in areas of low resource access, and recommend changes that would minimize such constraints and enhance the feasibility of affordable housing.</li> <li>▪ Continue to facilitate opportunities for all residents and stakeholders to provide meaningful and effective input on proposed planning activities early on and continuously throughout plan development and the public review process. Outreach efforts to disadvantaged communities in eastern, central, and southern Banning will be a priority. Partner with at least two neighborhood groups and other community organizations representing low-income residents and/or the neighborhoods of eastern, central, or southern Banning to conduct fair housing outreach.</li> <li>▪ Prioritize housing capacity, housing and infrastructure resources and investments, policies, and incentives for market rate and affordable housing development in eastern, central, and southern Banning, and annually monitor progress.</li> <li>▪ Monitor lot splits and two-unit developments under SB 9, provide technical assistance to homeowners, and develop or adjust development standards as needed. Provide information and resources about SB 9 on the City website by January 2025 as a way to promote affordable housing in higher-resource neighborhoods.</li> <li>▪ Prioritize the high and moderate resource areas east of N. Sunset Avenue when identifying potential sites for Habitat for Humanity builds.</li> </ul> |
| <b>Timeframe:</b> | <p>This program will be implemented on an ongoing basis through the remainder of the planning period. Conduct an in-depth study of fair housing issues around the city by January 2026. Begin workshops by December 2027. Update the City's website with SB 9 resources by January 2025.</p>   |

#### Program 27 Replacement Housing

The City of Banning will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- Currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- Was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- Occupied by low or very low-income households.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.</li> <li>▪ Encourage and facilitate the development of housing affordable to lower-income households.</li> </ul> |
| <b>Timeframe:</b>          | The replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed, and local policy shall be adopted by October 2023.   |

*Program 28 ADU Facilitation and Promotion Program*

The City of Banning prioritizes and encourages the development of Accessory Dwelling Units (ADUs) as opportunities for infill housing and in support of various state laws encouraging their construction (AB 68, 2019-Ting; AB 670, 2019-Friedman; AB 881, 2019-Bloom; SB 13, 2019-Wieckowski). ADUs are an innovative approach to adding more housing, particularly in single-family residential neighborhoods. ADUs can also offer a reliable source of income for moderate to lower income homeowners. The City already has ADU information on its website, but the City will ensure that the information is updated and promoted.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>▪ By February 2024, update the Zoning Ordinance/Municipal Code to integrate changes in State housing law.</li> <li>▪ Maintain and update an informational brochure in English and Spanish to promote, educate, and assist homeowners with developing ADUs.</li> <li>▪ Work with developers to incorporate ADUs into new single-family developments.</li> <li>▪ At least once annually, provide an informational workshop (in-person or online) on accessory dwelling units (ADUs), and target outreach to residents in the high and moderate resource areas east of N. Sunset Avenue. The first workshop shall occur by December 15, 2024. Objective is to have at least five workshop attendees.</li> <li>▪ By 2023, take appropriate measures to ensure regulatory compliance with State law for ADU development.</li> <li>▪ Annually monitor ADU production. Use data on building permit application processing times to identify trends and, if necessary, work to improve building plan reviews to reduce approval times and associated costs.</li> <li>▪ At least once during the planning period, analyze ADU development impact fees with the goal of reducing, loaning, granting, or waiving those costs in exchange for providing rents affordable to low- or moderate-income households for a set period of time.</li> </ul> |

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| <b>Timeframe:</b> | Starting in January 2022, take appropriate measures to ensure regulatory compliance with State law for ADU development.<br>Update zoning code by February 2024. Other actions ongoing throughout the planning period. |
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#### Program 29 Surplus Land Act Program

Leverage City-Owned Land for the development of 100 Percent Affordable Housing Projects. The City will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as “surplus properties” under California Law. The City will also conduct an analysis to determine, based on market conditions, if selling or leasing the properties would maximize the development of affordable units. The City will then send a Notice of Availability to all required parties regarding the availability of City surplus land available for purchase or lease. It is the City’s intent to facilitate the development of 100 percent affordable housing projects on vacant or underutilized City owned sites. The City will also coordinate with the public entities that own a site (or sites) to ensure that the legally mandated surplus property process is followed.

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| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <ul style="list-style-type: none"> <li>Evaluate the City’s availability of surplus land by December 2023 to support the development of lower-income housing units over the planning period.</li> </ul> |
| <b>Timeframe:</b>          | Issue Notice of Availability by March 2024.  |

#### Program 30 Site Annexation

Annexation is the process by which a city adds land within its jurisdictional boundaries. Lands must be within a city’s Sphere of Influence (SOI) to be annexed into the city or the SOI needs to be amended as part of the annexation process. The SOI is the planned growth area of a city, usually identified in their General Plan and includes General Plan land use designations for the areas within the SOI. An annexation is initiated by a Resolution of Application submitted by the City to Riverside County Local Agency Formation Commission (Riverside LAFCo). Annexation encourages orderly growth and provides standardized (City) services to those who live in the annexed area. The Site Inventory includes one annexation that is anticipated to be completed during the 6th housing cycle. Generally, the following steps must be taken to achieve annexation:

- City initiates annexation by a Resolution of Application submitted by the City or Petition of Application submitted by the property owner(s).
- Submit application and all required fees to LAFCo
- LAFCo Executive Officer will issue a Notice of Filing to the County Assessor and the Assessor provides assess valuation to the County Auditor
- Within 60 days, the Board of Supervisors and certain agencies must formally approve the tax agreement resolution.
- LAFCo holds a public hearing, receives public comment, and makes a determination on the request.

The Resolution of Application for annexations will be initiated by the City in 2024. To ensure these parcels are available for development during the planning period, the City will work with property owners and Riverside LAFCo to facilitate the annexation and availability of these parcels for residential development. Additionally, the City will update its Infrastructure Master Plan to include these properties and require planned infrastructure as part of the planning process. The City will ensure that infrastructure plans are created in a timely manner that coincides with housing development, and that housing is served by neighborhood-supporting retail and services.

|                            |  |
|----------------------------|--|
| <b>Funding:</b>            | Department Budget  |
| <b>Responsible Agency:</b> | Community Development Department   |
| <b>Objectives:</b>         | <p>The City will take steps necessary for the annexation and development of all annexation parcels included in the Site Inventory:</p> <ul style="list-style-type: none"> <li>Provide technical assistance to the development applicant and support City Council approval of pre-zoning on all parcels by December 2024.</li> <li>Coordinate with property owners and Riverside LAFCo to support the annexation application and process. Achieve annexation approval by July 2025.</li> <li>Support the development of a Specific Plan or Master Plan with the development capacity that meets RHNA objectives. Ensure infrastructure plans, including community infrastructure needs, are included with any Specific Plan or Master Plan and are adequate and timely for proposed development and phasing.</li> <li>Identify potential funding needs and sources to ensure adequate community infrastructure for annexed sites during the planning period.</li> <li>By 2026, if annexation does not occur, the City will rezone sites as necessary to maintain adequate sites to accommodate the RHNA by 2027.</li> </ul> |
| <b>Timeframe:</b>          | <p>Provide technical assistance to the development applicant and support City Council approval of pre-zoning on all parcels by December 2024.</p> <p>Coordinate with property owners and Riverside LAFCo to support the annexation application and process. Achieve annexation approval by July 2025.</p>  |

### Cumulative Effectiveness of Programs in Addressing Housing Needs of Special Needs Populations

Several of the above programs address the housing needs of special needs populations, including the elderly, persons with disabilities, large households, female-headed households, farmworkers, and persons experiencing homelessness. These programs will assist these populations with housing directly and indirectly, and will also provide housing resources and services. In terms of direct assistance, Program 8: Housing for Special Needs Populations commits the City to monitoring its policies, standards, and regulations to ensure they do not unduly impact persons with special needs. Some of the program's objectives include facilitating the development of affordable housing, annually updating policies to remove identified housing constraints, coordinating with local and regional housing agencies, and amending the Zoning Ordinance to allow supportive housing in



multi-family and mixed-use zones by right. The City also has the goal of developing 16 special needs units over the next eight years. Other programs that will directly address the needs of special needs populations are Program 9: Zoning Ordinance Monitoring and Program 16: Affordable Housing Development. Program 9 actively monitors the City's zoning ordinance to ensure that standards do not excessively constrain the development of emergency, transitional, and supportive housing, including farmworker housing, and Program 16 will further improve housing conditions for special needs populations, which are disproportionately burdened with poorer housing conditions. Together, these programs will increase the opportunity for persons with special needs to obtain quality, affordable housing.

Other programs described above will indirectly address the housing needs of special needs populations. Program 7: Multi-Family Acquisition and Rehabilitation and Program 11: Development Fees will make housing units more affordable by rehabilitating substandard multi-family housing, and by adjusting development fees to reduce housing cost, respectively. Special needs populations often require affordable housing, and these two programs will increase the affordable housing stock in the City. Program 7 will also reserve a portion of rehabilitated housing for special needs populations.

The City has inventoried existing single-family homes that are considered existing non-conforming based on the underlying zoning designation (industrial, commercial, etc.) The existing homes are unable to be modified besides routine maintenance because of their non-conformity. In order to allow for the conservation of 63 non-conforming single-family homes, the City will amend the land use and zoning maps to residential, as noted in Program 5: Residential Sites Monitoring Program. This action will allow for the preservation of 63 single-family homes, which will guard against potential displacement.

Several programs shall provide fair housing services and assistance to special needs populations, among others, which will further address and protect their housing needs. Program 25: Fair Housing Services) and Program 26: Affirmatively Furthering Fair Housing (AFFH) Program address the requirements of AB 686 and offer various forms of assistance to affirmatively further fair housing. Program 25 will connect residents of Banning to fair housing services provided by the County of Riverside, which include counseling and information on potential discrimination and landlord/tenant problems. Program 26 involves the City's contract with the Fair Housing Council of Riverside County (FHCRC), which provides fair housing services such as dispute resolution and addressed identified fair housing impediments on behalf of the City. Finally, Program 26 further addresses the requirements of AB 686 and involves the City's collaboration with the County of Riverside Public Housing Authority to complete a city-specific Analysis of Impediments to Fair Housing. The assistance and services provided through these three programs further address the housing needs of special needs populations, and complement the programs that directly and indirectly facilitate housing for these populations.

**Table 41 Quantified Housing Objectives (2021-2029)**

|                       | New Construction | Rehabilitation | Conservation/Preservation | Total Units  |
|-----------------------|------------------|----------------|---------------------------|--------------|
| Extremely Low Income  | 16               | 0              | 0                         | 16           |
| Very Low Income       | 317              | 20             | 0                         | 337          |
| Low Income            | 193              | 20             | 80                        | 193          |
| Moderate Income       | 280              | 20             | 0                         | 300          |
| Above Moderate Income | 883              | 20             | 63                        | 966          |
| <b>Total</b>          | <b>1,689</b>     | <b>80</b>      | <b>63</b>                 | <b>1,812</b> |

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# Appendix A

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Public Outreach



## Appendix A-1 City of Banning Webpage



City Departments

Living in Banning

Doing Business

Government

General Plan Advisory  
Committee Application

General Plan Circulation  
Element Amendment

Housing Element

Documents, Applications, and  
Information

Rancho San Geronio Specific  
Plan

[Home](#) » [City Departments](#) » [Community Development](#) » [Planning](#) » Housing Element

### Housing Element

2021 - 2029 Draft

[Housing Element Information](#)

2013 - 2021 Draft

[Housing Element Documentation](#)

[6/10/2014 Maps of Parcels](#)

2008 - 2014 Draft

[Housing Element Documentation](#)

[Environmental Documentation](#)

2013 - 2021 Draft

[Housing Element Documentation](#)

[6/10/2014 Maps of Parcels](#)

2008 - 2014 Draft

[Housing Element Documentation](#)

[Environmental Documentation](#)



# City of Banning

## Housing Element Information

### What is the Housing Element?

The Housing Element is part of the city's General Plan and is one of the mandatory elements. That means the city is required to have a Housing Element that is consistent with the State's general law. The Housing Element is governed by the California Government Code and is required to be updated every 8 years by the statutory deadline. The Housing Element is responsible for identifying a city's existing and projected housing need; goals, policies, and quantified objectives on achieving housing for all economic segments of the population; available financial resources; scheduled programs for the preservation of housing and an identification of adequate housing sites for all economic segments of the community, persons with special needs and emergency shelters.

California Government Code Article 10.6, Sections 65580-65589.11

### Why is the Housing Element periodically updated?

The planning period for the Housing Element is 8 years. The city's current Housing Element is for planning period 2013-2021. Pursuant to state law, the city is now updating its Housing Element for Planning Period 2021-2029. The Housing Element planning period aligns with the State's allocation of the Regional Housing Needs Assessment, commonly known as RHNA. The State Department of Housing and Community Development (HCD) assesses the RHNA every 8 years and distributes an allocation of the housing units to the various regions throughout the state. This allocation is eventually distributed across the counties and cities in California to be included in the Housing Element.

### How does the city know how many residential units to plan for in the Housing Element?

The RHNA decides the number of residential units the city must plan for in the Housing Element. For the Housing Element Update covering planning period 2021-2029, the city must plan for 1,673 residential housing units.

### Which housing income levels is the city required to plan for in the Housing Element Update?

The RHNA specifically identifies the number of residential units required for each economic income segment, which includes very-low, low, moderate, and above-moderate incomes. The table below shows the residential units allocated to the City of Banning for each income category.

| Income Category based on Area Median Income (AMI) | Number of Units to Accommodate | Percent (%) |
|---|--------------------------------|-------------|
| Extremely Low 30% or less*                        | 155                            | 9.3         |
| Very Low Income between 31 and 50% AMI            | 162                            | 9.7         |

|   |              |            |
|---|--------------|------------|
| Low Income between 51 and 80% AMI           | 193          | 11.6       |
| Moderate Income between 81 and 120% AMI     | 280          | 16.7       |
| Above-Moderate Income greater than 120% AMI | 883          | 52.7       |
| <b>Total</b>                                | <b>1,673</b> | <b>100</b> |

Source: Final Regional Housing Needs Allocation, SCAG, (2021).

\* The City has a RHNA allocation of 192 very low-income units (inclusive of extremely low-income units). Pursuant to State law (AB 2634), the City must project the number of extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units as extremely low. According to the CHAS data developed by HUD, 33.0% of City households earned less than 50 percent of the AMI. Among these households, 49.3 percent earned incomes below 30% (extremely low). Therefore, the City's RHNA allocation of 317 very low-income units may be split into 155 extremely low and 162 very low-income units. However, for purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low-income category.

### How does the city demonstrate to HCD that it has enough sites planned for housing?

Included in the city's Housing Element is an inventory of the sites that shows where housing units can be accommodated. The sites must be vacant or underutilized and have potential for development during the eight-year planning period. Some of the sites identified may be already zoned for housing that can accommodate a certain percentage of the RHNA income categories. However, where the city's available sites zoned for residential and mixed-use purposes are not adequate to fully meet the city's RHNA, the city would need to rezone sites to plan for housing in accordance with the RHNA allocation. The city's rezoning can include a) increasing the residential density on property already zoned residential to allow for additional housing units, b) rezoning property from nonresidential to residential; or c) establishing an affordable housing overlay zone on currently underutilized properties.

According to HCD's Housing Element Site Inventory Guidebook, an affordable housing overlay zone is a zoning tool that allows a city to modify existing zoning to allow for or require certain types of residential development on a parcel without changing the underlying zoning district. This means a parcel currently being used for a non-residential land use, such as commercial or industrial and zoned as such, can continue to be used in accordance with the underlying zoning. However, should the property owner decide to redevelop the site with residential, the site would be allowed to have residential in accordance with the provisions established by the affordable housing overlay. The affordable housing overlay demonstrates where additional housing can be planned should the current use of the property be repurposed in the future.

### Does the city build the housing units on the sites that have been identified in the Housing Element?

No. The city does not build housing. New housing is constructed by developers that own property or plan on acquiring property for new housing.

### Is the property owner required to build housing on the sites identified within the 8-year planning cycle of the Housing Element?

No. Although the Housing Element identifies enough sites are available in the city to plan for housing and to facilitate the development of affordable multiple family housing by allowing higher density residential in certain areas, it does not mean the property owner is required to build the housing within the next 8 years or any time in the future. The Housing Element is a planning document that enables the city in meeting its housing goals.

### How did the city determine the housing opportunity sites?

Aside from the sites already zoned residential or mixed use, the city used the best practices for selecting sites to accommodate the lower income RHNA mentioned in HCD's Housing Element Site Inventory Guidebook. These sites are for higher density residential, which are intended to accommodate housing units for lower and moderate-income households. Additionally, the city used the survey results from the city's housing survey issued earlier this year in May 2021. The survey results are available at <https://www.surveymonkey.com/stories/SM-XPWLJFGC/>

Per the HCD Site Inventory Guidebook, sites best suited to accommodate the RHNA for lower income households should include factors such as:

- Proximity to transit.
- Access to high performing schools and jobs.
- Access to amenities, such as parks and services.
- Access to health care facilities and grocery stores.
- Locational criteria that meet Low-income Housing Tax Credit Program funding.
- Proximity to available infrastructure and utilities.
- Sites that do not require environmental mitigation.

The city's housing survey also asked, "Which areas of the city do you think would be better suited for high density residential involving apartments and/or condominiums?" The survey results show 46% of the responses favor higher density in areas where public transportation is within walking distance and 43% of the responses favor higher density in areas near commercial centers.

### When is the city required to rezone the sites identified for rezoning?

The city has 3 years and 120 days from the beginning of the Housing Element planning period to rezone sites to meet the city's shortfall of the RHNA. The planning period begins on October 15, 2021.

### How does HCD know if the city has a state compliant Housing Element after it is adopted by the City Council?

The city is required to submit its draft Housing Element to HCD for review. Prior to adoption of the Housing Element, the city must seek HCD comments on the Draft Housing Element. The adopted Housing Element is also required to be submitted to HCD for review. If HCD determines the city's Housing Element was prepared in compliance with state law, HCD will issue a Finding of Substantial Compliance to the city. If HCD determines the city's Housing Element was not prepared in compliance with state law, the city will need to revise the Housing Element based on HCD's comments. The city would need to resubmit the revised Housing Element to HCD. The city would only need to repeat the latter process if the resubmitted Housing Element is not certified by HCD.

HCD has an Accountability and Enforcement Division that is specifically assigned to monitor the compliance of local jurisdictions' housing elements. This division also investigates complaints on local discretionary land use planning decisions that possibly would jeopardize a certified Housing Element. Additionally, cities are required to submit an annual housing progress report to HCD, which includes an inventory of properties that have been rezoned to meet the shortfall in the RHNA.

The Accountability and Enforcement Division was created due to the passage of Assembly Bill (AB) 72 and AB 101. These laws give additional enforcement tools to HCD and the California Attorney General to move forward with legal action against a local jurisdiction if the Housing Element is not compliant with state law. A

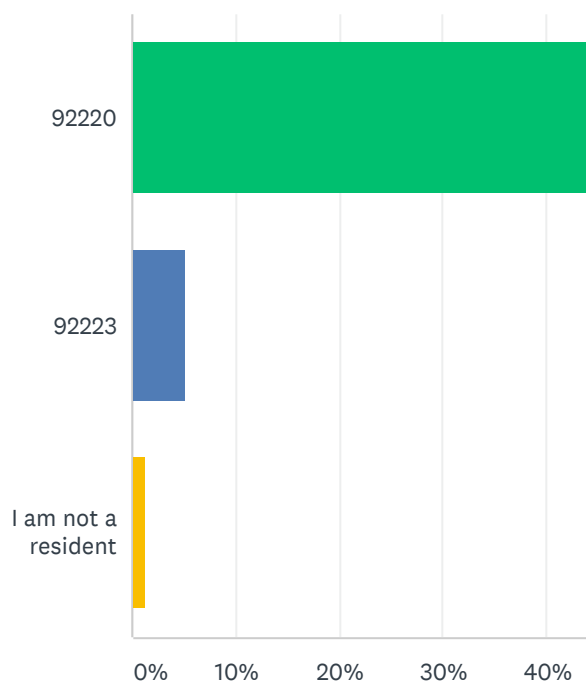



city is a subdivision of the state and local laws may not conflict with general law. In this case, general law includes the State Planning and Zoning Law and the specific requirements of the Housing Element law. With the adoption of AB 101 (2019), the Attorney General can seek a court order directing a local jurisdiction to bring its Housing Element into compliance. The court can enforce this by imposing fines, appoint a receiver to step in, take the process over from the local jurisdiction and bring the Housing Element into substantial compliance. Additionally, a jurisdiction would become ineligible for certain grants that require a jurisdiction to have a certified Housing Element.

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## Appendix A-3 Housing Element Update Survey

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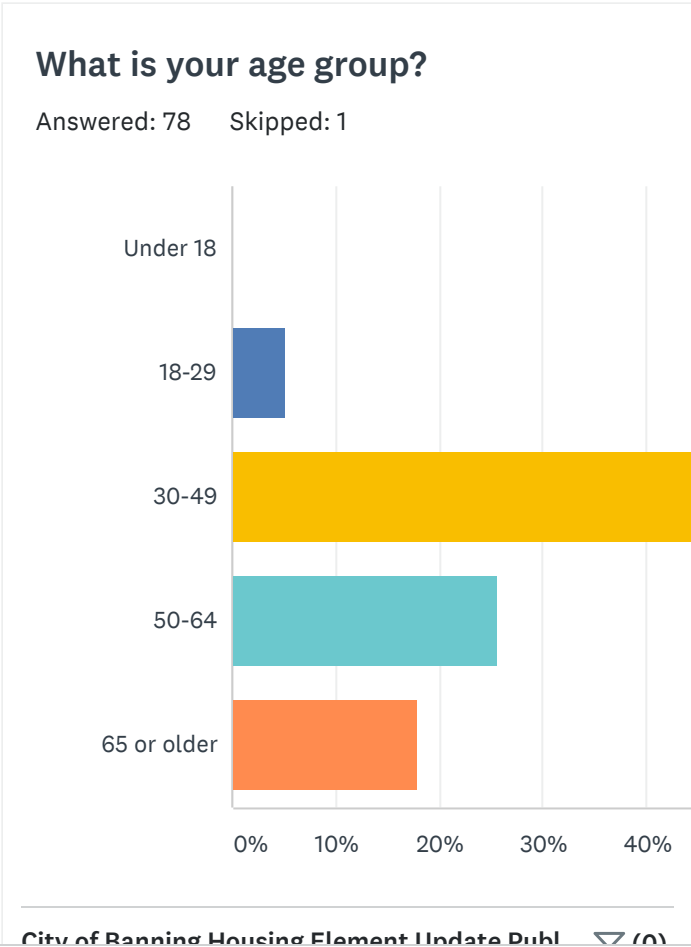
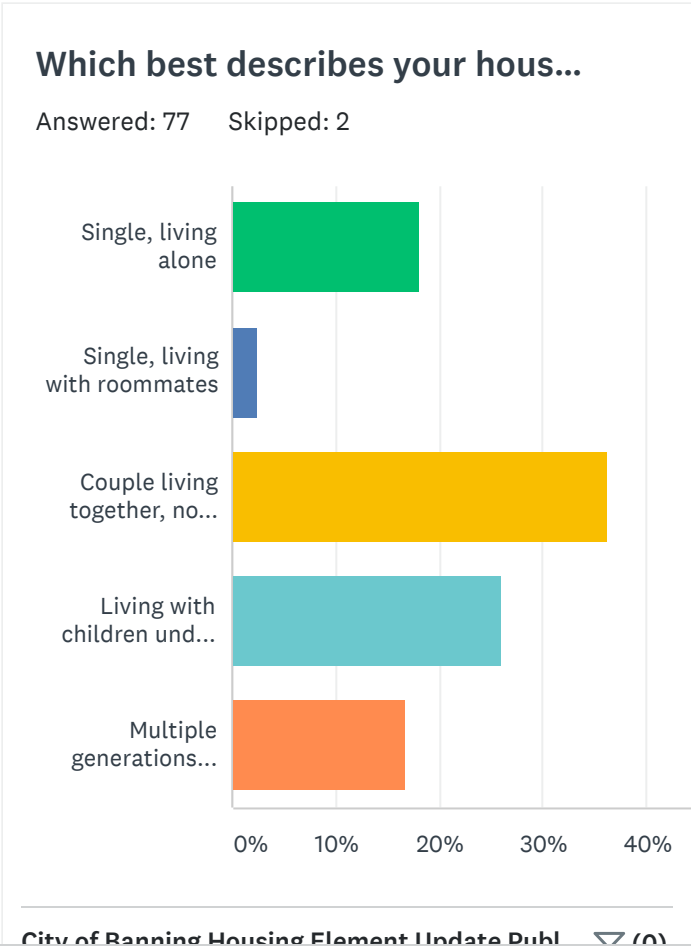
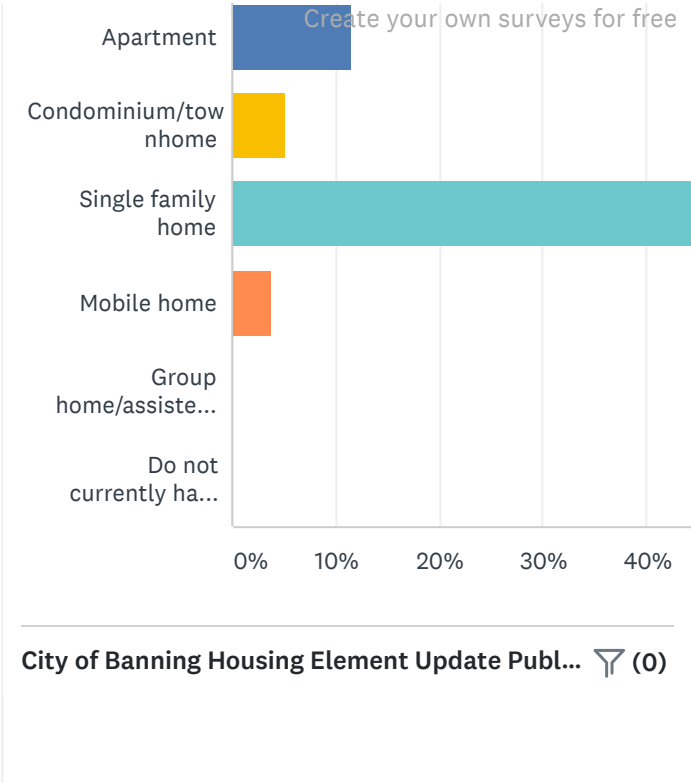
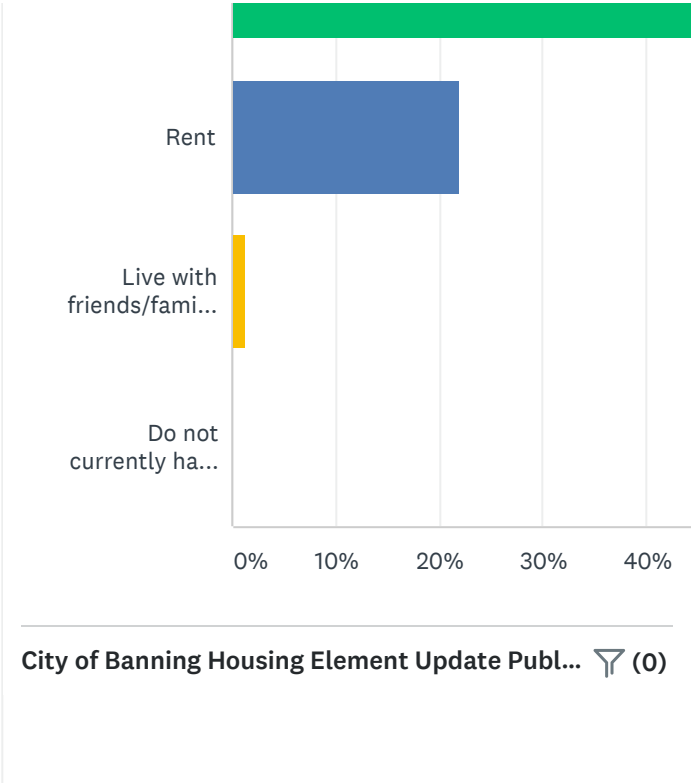
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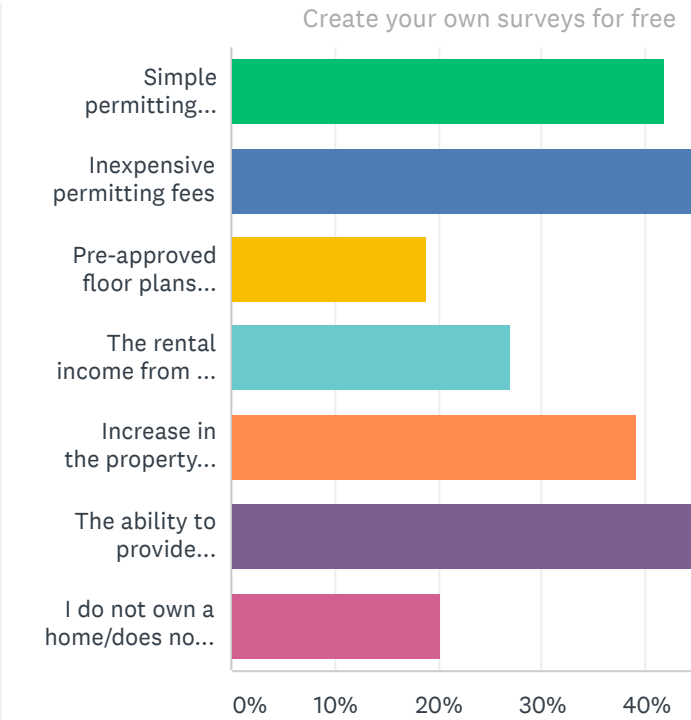
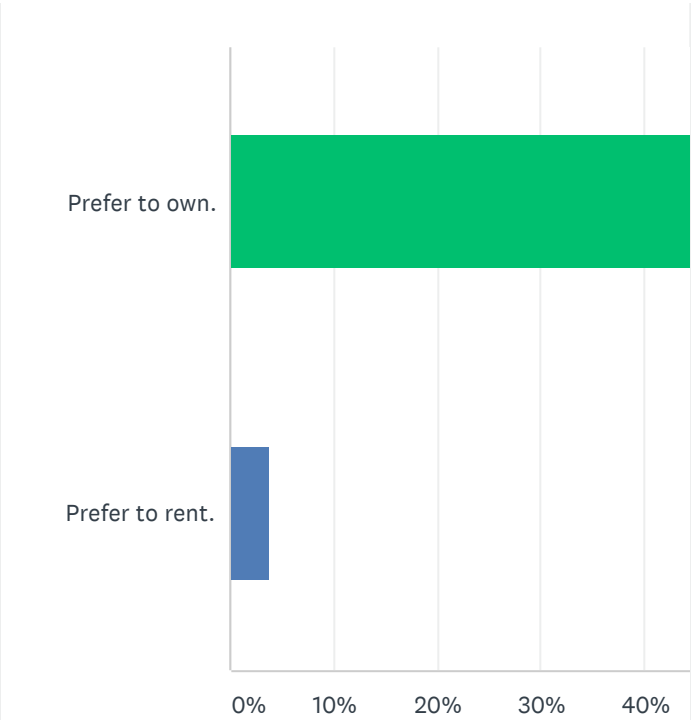
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<https://www.surveymonkey.com/stories/SM-XPWLJFGC/>

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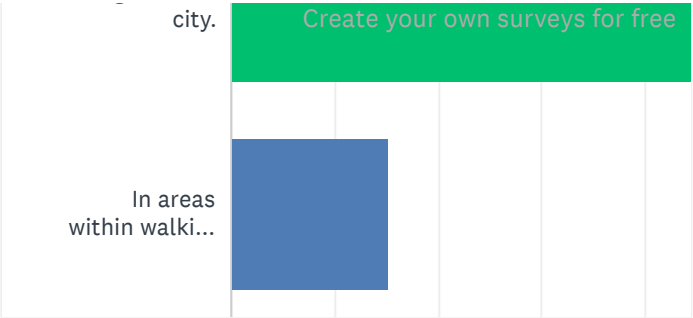
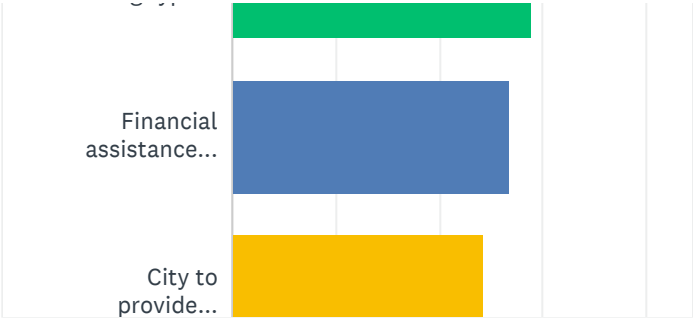
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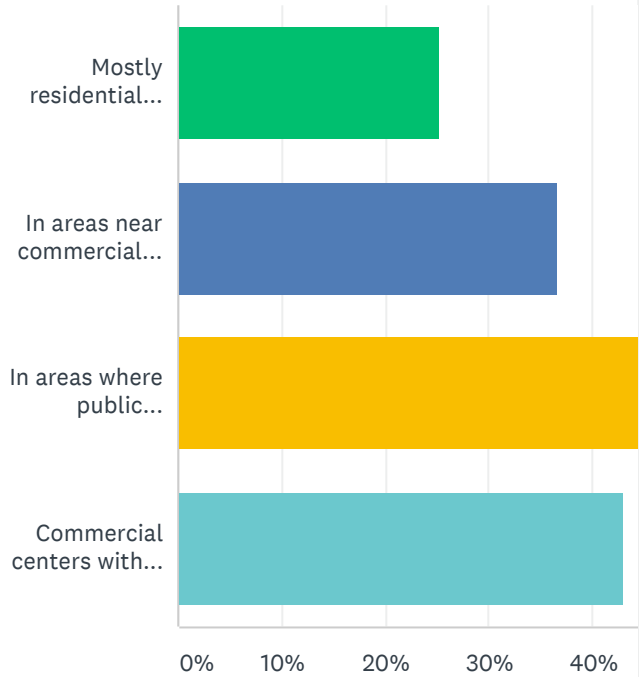
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COPY



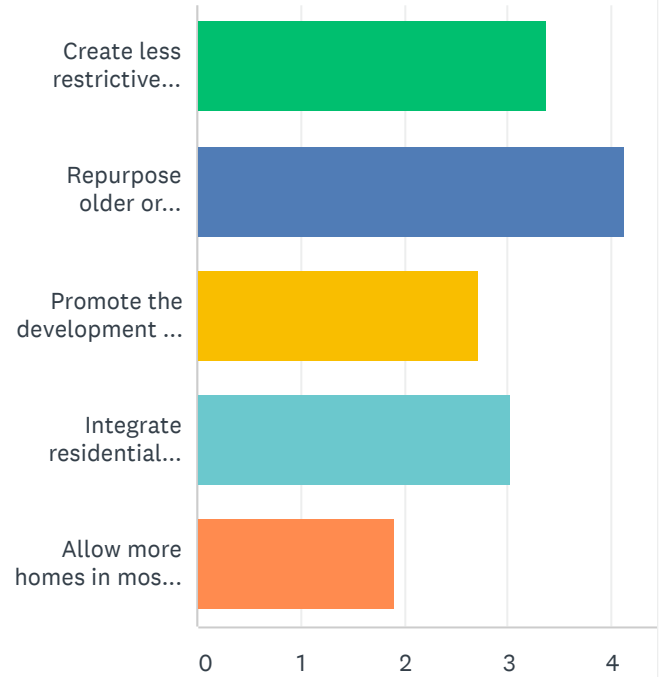
Which areas of the City do you t...

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# CITY OF BANNING HOUSING ELEMENT UPDATE



## JOIN US FOR A VIRTUAL STAKEHOLDER WORKSHOP



The City of Banning invites you to attend a community meeting on the City's Housing Element Update for Planning Period 2021–2029. Please join us to learn more about the update process, potential housing locations, and opportunities for meeting the City's housing goals (including affordable and special needs housing).

### WHAT IS THE HOUSING ELEMENT?

The Housing Element establishes goals, policies, and implementation measures to guide the development of housing in Banning. It is included in the Banning General Plan and outlines the City's plan to meet existing and projected future housing needs for all economic segments of the community.

### TAKE THE SURVEY!



You can also provide input via our survey:

[www.surveymonkey.com/r/MP6ZCMP](https://www.surveymonkey.com/r/MP6ZCMP)

### JOIN US ON JUNE 2<sup>ND</sup> AT 5:30 PM

The meeting will be hybrid in-person and online. Please join us in person at the Banning City Hall:

City of Banning  
Council Chambers  
99 E. Ramsey Street  
Banning, CA 92220

OR by desktop, tablet, and phone at the link below:



[www.banningca.gov/  
Archive.aspx?ADID=2483](https://www.banningca.gov/Archive.aspx?ADID=2483)

### FOR MORE INFORMATION:



Contact Adam Rush, Community Development Director  
at [arush@banningca.gov](mailto:arush@banningca.gov) or (951) 922-3131

<http://banning.ca.us/>

*Visite la página web anterior para obtener información en español. Para seleccionar español, consulte el menu desplegable en la página web.*

## Appendix A-5 Stakeholder Consultation Matrix

### Stakeholder Consultation Matrix

| Agency   | Type                                  | EMAIL  | First       | Last        | Title                            |
|--|---------------------------------------|--|-------------|-------------|----------------------------------|
| 211 Community Connect  | Continuum of Care                     | <a href="mailto:mdavis@connectriverside.org">mdavis@connectriverside.org</a>                   | Marie       | Davis       | CEO/President                    |
| AARP California  | Services-Elderly                      | <a href="mailto:FBuzo@aarp.org">FBuzo@aarp.org</a>   | Fred        | Buzo        | Associate State Director         |
| Alternatives to Domestic Violence Riverside  | Services-Victims of Domestic Violence | <a href="mailto:info@alternativestodv.org">info@alternativestodv.org</a>                       |             |             |                                  |
| Building Industry Association - Riverside Chapter  | Business Leader                       | <a href="mailto:eo@riversidebia.org">eo@riversidebia.org</a>                                   | Lou         | Monville    | President                        |
| C & C Development  | Assisted Housing                      | <a href="mailto:todd@c-cdev.com">todd@c-cdev.com</a>   | Todd        | Cottle      | Developer                        |
| California State Senate  | Government - State                    | <a href="mailto:Alessandra.Magnasco@sen.ca.gov">Alessandra.Magnasco@sen.ca.gov</a>             | Alessanda   | Magnasco    | State Senator Senator Ochoa Bogh |
| Casa de la Villa   | Assisted Housing                      | <a href="mailto:casadelavilla@villageinvestments.net">casadelavilla@villageinvestments.net</a> |             |             |                                  |
| City Net Homeless Services   | Services-Homeless                     | <a href="mailto:OUTREACH@CITYNET.ORG">OUTREACH@CITYNET.ORG</a>                                 |             |             |                                  |
| Coachella Valley Housing Coalition   | Services-Housing                      | <a href="mailto:cvhc@cvhc.org">cvhc@cvhc.org</a>   |             |             |                                  |
| Corona Chamber of Commerce   | Business Leader                       | <a href="mailto:info@thebanningchamber.com">info@thebanningchamber.com</a>                     |             |             |                                  |
| Council on Aging   | Services-Elderly                      | <a href="mailto:landerson@coasc.org">landerson@coasc.org</a>                                   | Libby       | Anderson    | Director Ombudsman               |
| County of Riverside Department of Public Social Services - Administrative Department CPA | Child Welfare Agency                  | <a href="mailto:chdougl@rivco.org">chdougl@rivco.org</a>                                       | Charity     | Douglas     | Deputy Director in Charge        |
| County of Riverside Transportation and Land Management Agency                            | Public Land Agency                    | <a href="mailto:JHildebr@RIVCO.ORG">JHildebr@RIVCO.ORG</a>                                     | John        | Hildebrandt | Regional Office Manager          |
| County of Riverside Veterans' Services   | Services - Veterans                   | <a href="mailto:jkadnerson@rivco.org">jkadnerson@rivco.org</a>                                 | James Kelly | Anderson    | Assistant Director               |
| Fair Housing Council of Riverside  | Services-Fair Housing                 | <a href="mailto:jreed@fairhousing.net">jreed@fairhousing.net</a>                               | Jamila      | Reed        | Program Manager                  |
| Grace Lutheran Church  | Religious                             | <a href="mailto:office@glcbanning.org">office@glcbanning.org</a>                               |             |             |                                  |
| Habitat For Humanity   | Services-Housing                      | <a href="mailto:kmichalak@habitatriverside.org">kmichalak@habitatriverside.org</a>             | Kathy       | Michalak    | Executive Director               |
| Housing Authority of Riverside County  | PHA                                   | <a href="mailto:chui@rivco.org">chui@rivco.org</a>   | Cindy       | Hui         | Principal Dev. Spec.             |
| Inland Empire Women's Business Center  | Services-Employment                   | <a href="mailto:mskiljan@iewbc.org">mskiljan@iewbc.org</a>                                     | Michelle    | Skiljan     | Executive Director               |
| Inland Regional Center   | Services-Disabilities                 | <a href="mailto:community@inlandrc.org">community@inlandrc.org</a>                             |             |             |                                  |
| Jamboree Housing Corp  | Services-Housing                      | <a href="mailto:info@jamboreehousing.com">info@jamboreehousing.com</a>                         |             |             |                                  |
| Local Initiatives Support Corporation  | Assisted Housing                      | <a href="mailto:MCarroll@lisc.org">MCarroll@lisc.org</a>                                       | Michael     | Carroll     |                                  |
| Mary Erickson Community Housing  | Assisted Housing                      | <a href="mailto:info@mayerickson.org">info@mayerickson.org</a>                                 |             |             |                                  |
| Neighborhood Housing Services Inland Empire  | Services-Housing                      | <a href="mailto:info@nhsie.org">info@nhsie.org</a>   |             |             |                                  |
| Riv County Emergency Management Dept.  | Emergency Management Agency           | <a href="mailto:crich@rivco.org">crich@rivco.org</a>   | Christina   | Rich        | Secretary                        |
| Riv. University Health System Public Health  | Services-HIV/AIDS                     | <a href="mailto:swalton@ruhealth.org">swalton@ruhealth.org</a>                                 | Sheila      | Walton      | Secretary HIV/STD                |
| Riverside County Flood Control and Water Conservation District                           | Floodplain Management Agency          | <a href="mailto:wmcornel@rivco.org">wmcornel@rivco.org</a>                                     | Micheal     | Cornelius   | Engineer Tech II                 |
| Riverside County Board of Supervisors  | Government - Local                    | <a href="mailto:district2@rivco.org">district2@rivco.org</a>                                   | Karen       | Spiegel     | Supervisor, 2nd District         |
| Riverside County Department of Mental Health   | Services-Housing                      | <a href="mailto:MHWEB@ruhealth.org">MHWEB@ruhealth.org</a>                                     |             |             |                                  |
| Riverside County Department of Public Social Services                                    | Continuum of Care                     | <a href="mailto:jortego@rivco.org">jortego@rivco.org</a>                                       | James       | Ortego      | Deputy Director                  |
| Riverside County Homelessness Solutions  | Services-Homeless                     | <a href="mailto:mdavis@riversideca.gov">mdavis@riversideca.gov</a>                             |             |             |                                  |
| Riverside County Housing Authority   | Assisted Housing                      | <a href="mailto:housing@riversideca.gov">housing@riversideca.gov</a>                           |             |             |                                  |
| Riverside County Office of Aging   | Services-Elderly                      | <a href="mailto:rcaging@rivco.org">rcaging@rivco.org</a>                                       |             |             |                                  |
| Riverside County Planning Department   | Government - Local                    | <a href="mailto:planning@rivco.org">planning@rivco.org</a>                                     |             |             |                                  |
| Riverside County Supervisor District 5   | Government - Local                    | <a href="mailto:district5@rivco.org">district5@rivco.org</a>                                   |             |             |                                  |
| Riverside Economic Development Agency - Housing Division                                 | Services-Housing                      |  |             |             |                                  |
| Riverside Housing Development Corporation  | Assisted Housing                      | <a href="mailto:website@rhdcca.org">website@rhdcca.org</a>                                     |             |             |                                  |
| Riverside Transit Authority  | Government - Regional                 | <a href="mailto:kwarsinski@riversidetransit.com">kwarsinski@riversidetransit.com</a>           | Kristin     | Warsinski   | Director of Planning             |
| Southern California Council of Governments (SCAG)  | Government - Regional                 | <a href="mailto:cartagena@scag.ca.gov">cartagena@scag.ca.gov</a>                               | Arnold      | San Miguel  | Regional Affairs Officer         |
| The Inland Gateway Assoc of Realtors   | Business Leader                       | <a href="mailto:sanmiguel@scag.ca.gov">sanmiguel@scag.ca.gov</a>                               | Javiera     | Cartagena   | Reg. Affairs Manager             |
| U.S. Department of Housing and Urban Development   | Government - Federal                  | <a href="mailto:staff@tigar.org">staff@tigar.org</a>   |             |             |                                  |
| WRCOG  | Government - Regional                 | <a href="mailto:Marilou.Flores@hud.gov">Marilou.Flores@hud.gov</a>                             | Marilou     | Flores      | CPD Representative               |
|  |                                       | <a href="mailto:cgray@wrcog.us">cgray@wrcog.us</a>   |             |             |                                  |



rincon

# RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers



BANNING  
CIVIC CENTER

## The Housing Element Update

*Community Workshop*

October 18, 2023





- Overview of the Housing Element, RHNA, & Applicable State Law
- Sites Inventory
- Affirmatively Furthering Fair Housing Requirements
- Project Timeline and Next Steps
- Questions, Discussion, & Community Input

# What is a Housing Element?



## Other General Plan Elements



**Land Use**



**Mobility**



**Conservation**



**Open Space**



**Safety**



**Noise**

- Housing Element is one of the required elements of a General Plan.
- Covers an 8-year planning period from June 30, 2023, to December 31, 2031.
- Sites inventory with Zoning to meet Regional Housing Needs Allocation (RHNA).
- Policies and Programs.
- Many Statutory Requirements – Affirmatively Furthering Fair Housing, HCD Review, Constraints, etc.

# Acronyms & Terms



- **RHNA:** Regional Housing Needs Assessment
- **SCAG:** Southern California Association of Governments
- **WRCOG:** Western Riverside County Association of Governments
- **HCD:** California Dept. of Housing and Community Development
- **Density:** Housing Units per Acre
- **General Plan:** City's Long-Term Planning Document to Guide Growth
- **Zoning:** Regulations on land development for a specific area
- **ADU:** Accessory Dwelling Unit
- **JADU:** Junior Accessory Dwelling Unit
- **ELI/VLI:** Extremely Low-Income/Very Low-Income Households
- **AFFH:** Affirmatively Furthering Fair Housing

# Content of the Housing Element



- Policy and Programs Review
- Housing Needs Assessment
- Housing Constraints Assessment
- Adequate Sites Inventory
- Analysis of Fair Housing
- Housing Resources Assessment
- Implement Plan (Goals and Policies)

# Current Draft Housing Element



## What is **Affordable Housing**?



The government says housing is "affordable" if a family spends **no more than 30%** of their income to live there.



## Adopted by CC on November 9, 2021

- Transmitted to HCD on November 18, 2021
- HCD did not Certify the Housing Element
- HCD sent Comment Tracker February 2022
- Revised Draft to HCD for informal review, January 2023
- HCD sends additional comments May 2023
- HCD sends Non-Compliance letter July 2019
- Staff meets with HCD September 20, 2023, to set schedule for Readoption/Certification

# Non-Compliance



Violation of state law

Potential state enforcement actions

City can be Vulnerable to lawsuits

Entire General Plan can be put at risk

Funding programs at risk

# Workshop Topics



- Brief overview of the Housing Element and the Regional Housing Needs Assessment (RHNA)
- Housing Plan and Potential Sites
- Overview of Past Performance/Adoption/Certification
- Recently Approved Projects and Programs
- Current Housing Element Schedule
- Question and Answer?



# Housing Element Objectives



Provide planning to accommodate housing for all socio-economic segments

Affordable housing opportunities for all current and future residents

Remove unreasonable governmental barriers to housing development

Preserve and improve existing affordable housing

Ensure equal access for housing opportunities for all



# RHNA Breakdown



| Income Category   | Income Characteristics<br>(Area Median Income = AMI) | Annual Income Range | Number of Units in 6 <sup>th</sup> Cycle RHNA |
|---|--|---------------------|---|
| Extremely Low*  | 29% or less AMI                                      | \$12,259 or less    | *   |
| Very Low Income*  | 30 – 50% AMI   | \$12,682 – \$21,137 | 317*  |
| Low Income*   | 51 – 80% AMI   | \$21,560 – \$33,819 | 193   |
| Moderate Income   | 81 – 120% AMI  | \$34,242 - \$50,729 | 280   |
| Above Moderate Income   | 120%+ AMI  | \$50,729 or more    | 883   |
| <small>Source: Department of HUD and Urban Development (HUD) SCAG Pre-Certified Local Housing Data 2020 American Community Survey (2015-2019)</small> |  |                     |   |
| <b>Total</b>  |  |                     | <b>1,673</b>                                  |

\*Categories commonly combined to form "Lower Income" category

# Public Survey Results



## Majority of respondents:

- Are homeowners and live in a single-family home.
  - Prefer to own rather than rent.
- Think the best approaches for housing are to have **more housing types available** in the City, and to **offer financial assistance programs** (rental and down payment assistance).
  - Prefer that new housing is distributed **throughout the City**.
- Consider **areas within walking distance of public transit** as most suitable for high-density housing.
  - Think that the most effective ways to provide housing opportunities for all incomes are to **repurpose older or underutilized commercial centers** and **create less restrictive development standards** near commercial centers.

# Achieving RHNA

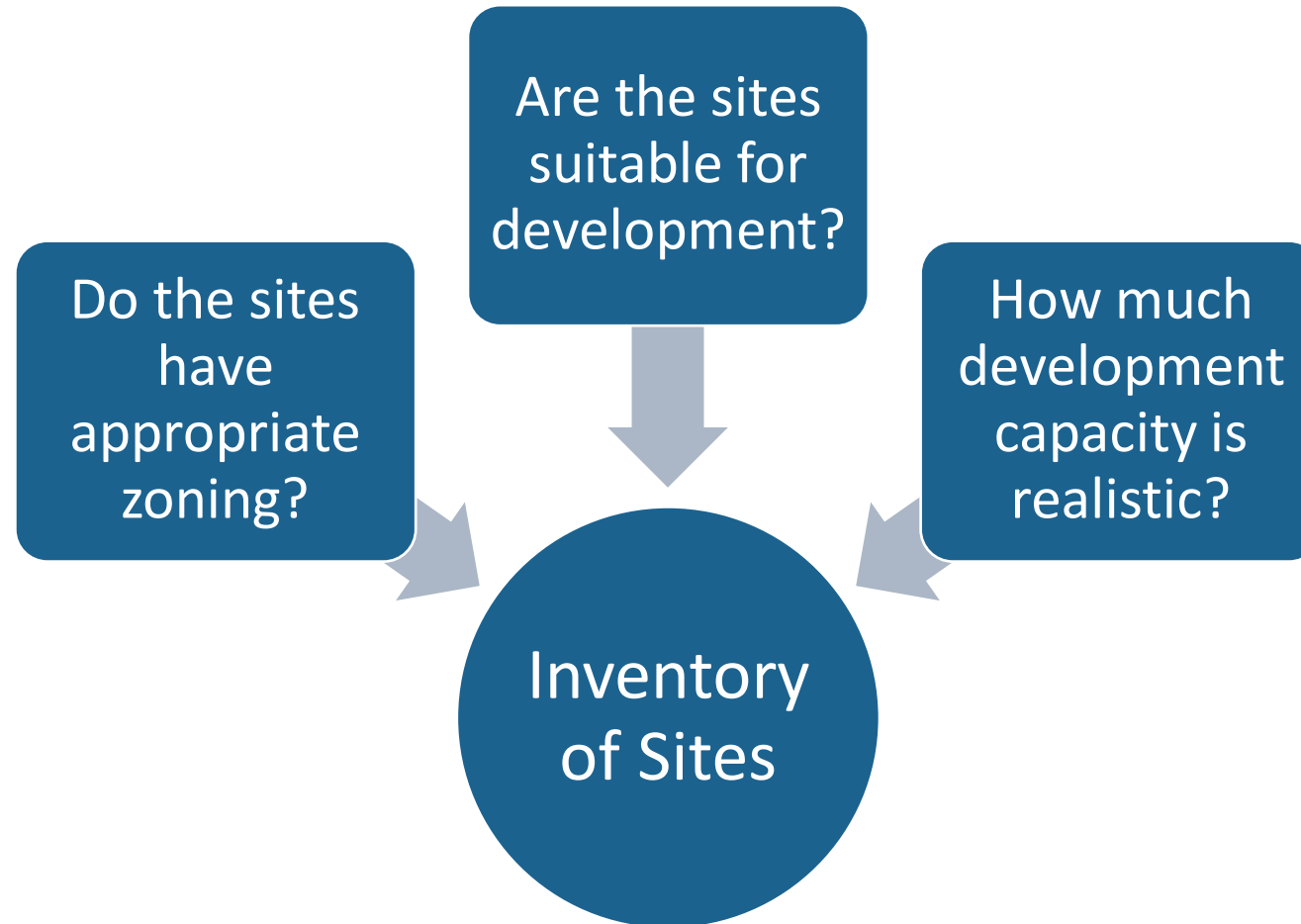


□ **Site selection is key** to accommodating growth in residential development:

- Planned and approved units
- Vacant and underutilized sites
- Rezone sites for higher density

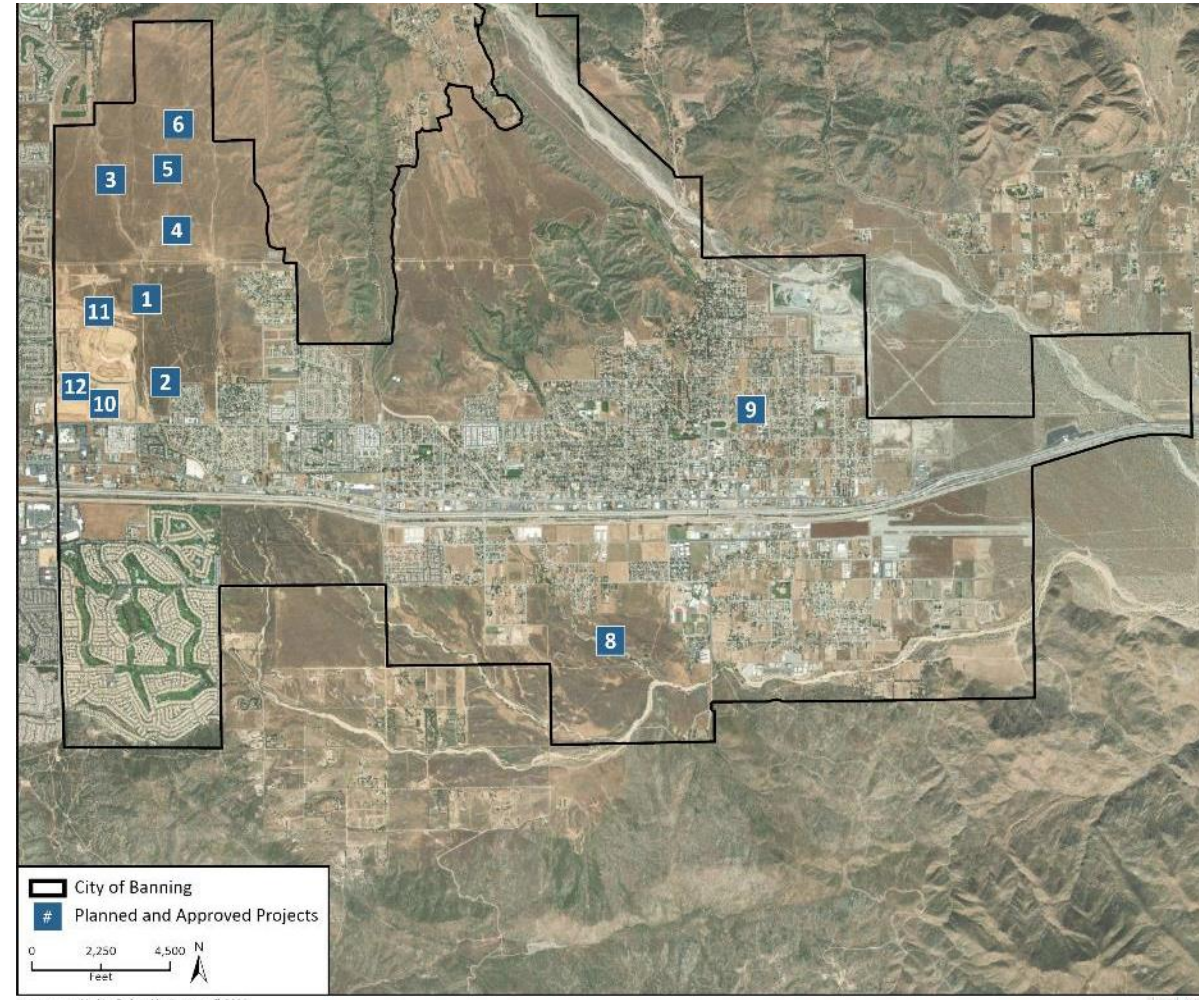


# Identifying Suitable Sites







# Planning & Approved Projects

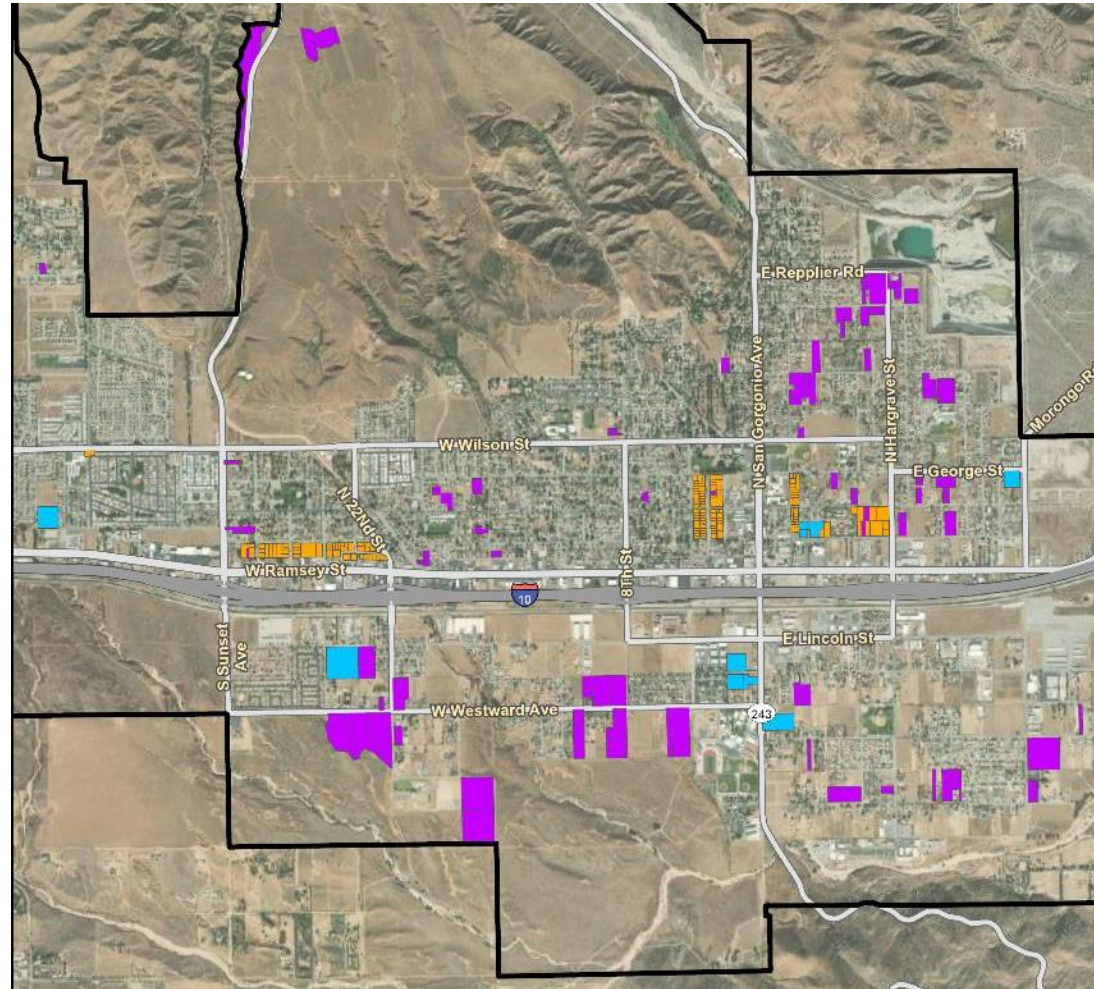




# Site Inventory



-  Vacant Sites
-  Underutilized Sites
-  Rezoned Sites per CC Ordinance 1584 (9/13/22)





# Rezoned Sites Overview





# Housing Element Update



## Rezoned VLDR (9/13/22)



### LEGEND

#### Proposed Zoning

- Low Density Residential (0-5 du/ac)
- Medium Density Residential (0-10 du/ac)
- High Density Residential (11-18 du/ac)
- Very High Density Residential
- High Density Residential-20/Affordable Housing Opportunity (20-24 du/ac)

- Mobile Home Parks
- Business Park
- General Commercial
- Highway Serving Commercial
- Open Space - Parks
- Open Space - Resources

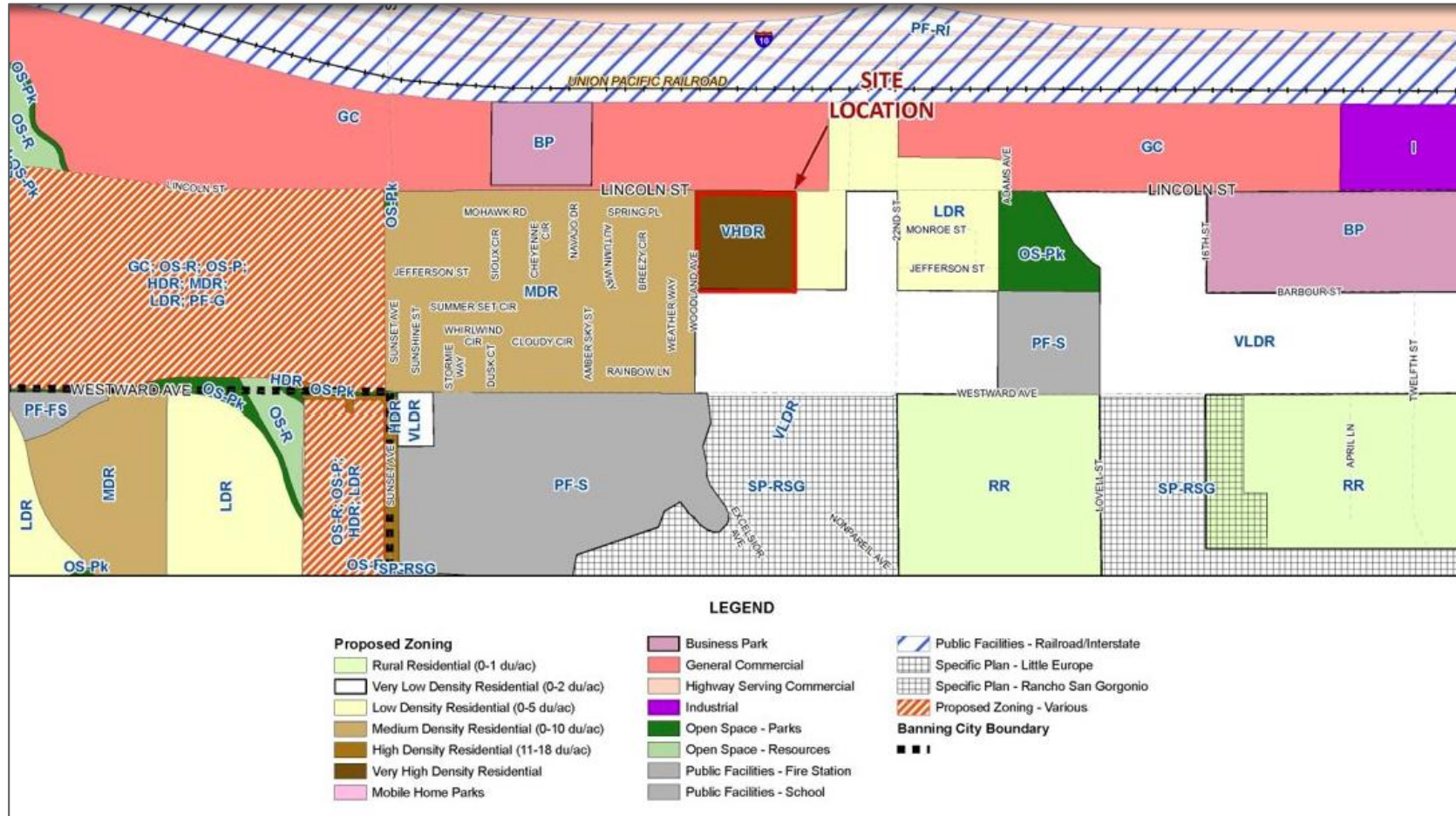
- Professional Office
- Public Facilities - Fire Station
- Public Facilities - Government
- Public Facilities - School
- Public Facilities - Railroad/Interstate
- Specific Plan - Little Europe



# Housing Element Update



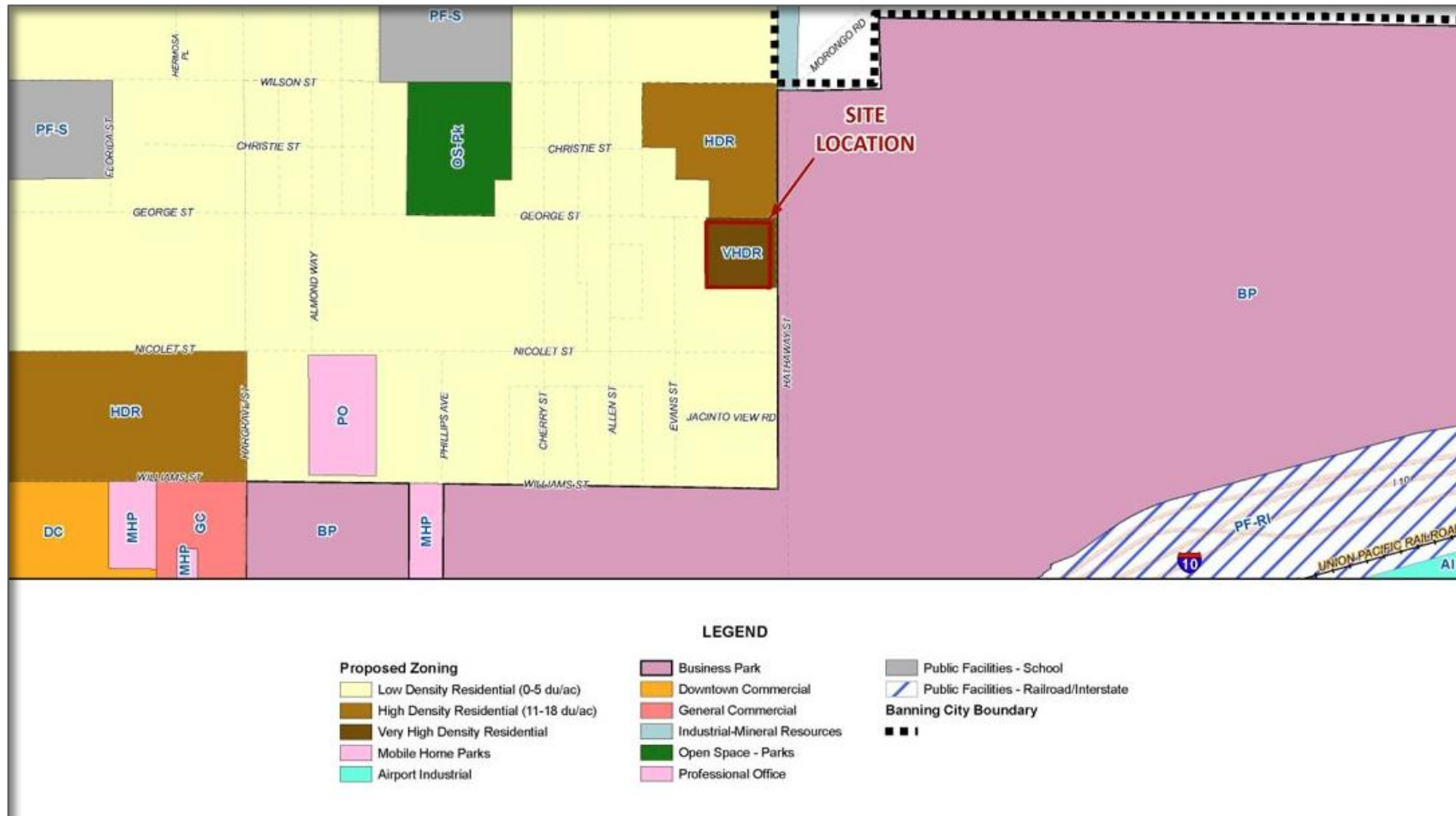
## Rezoned VLDR (9/13/22)



# Housing Element Update



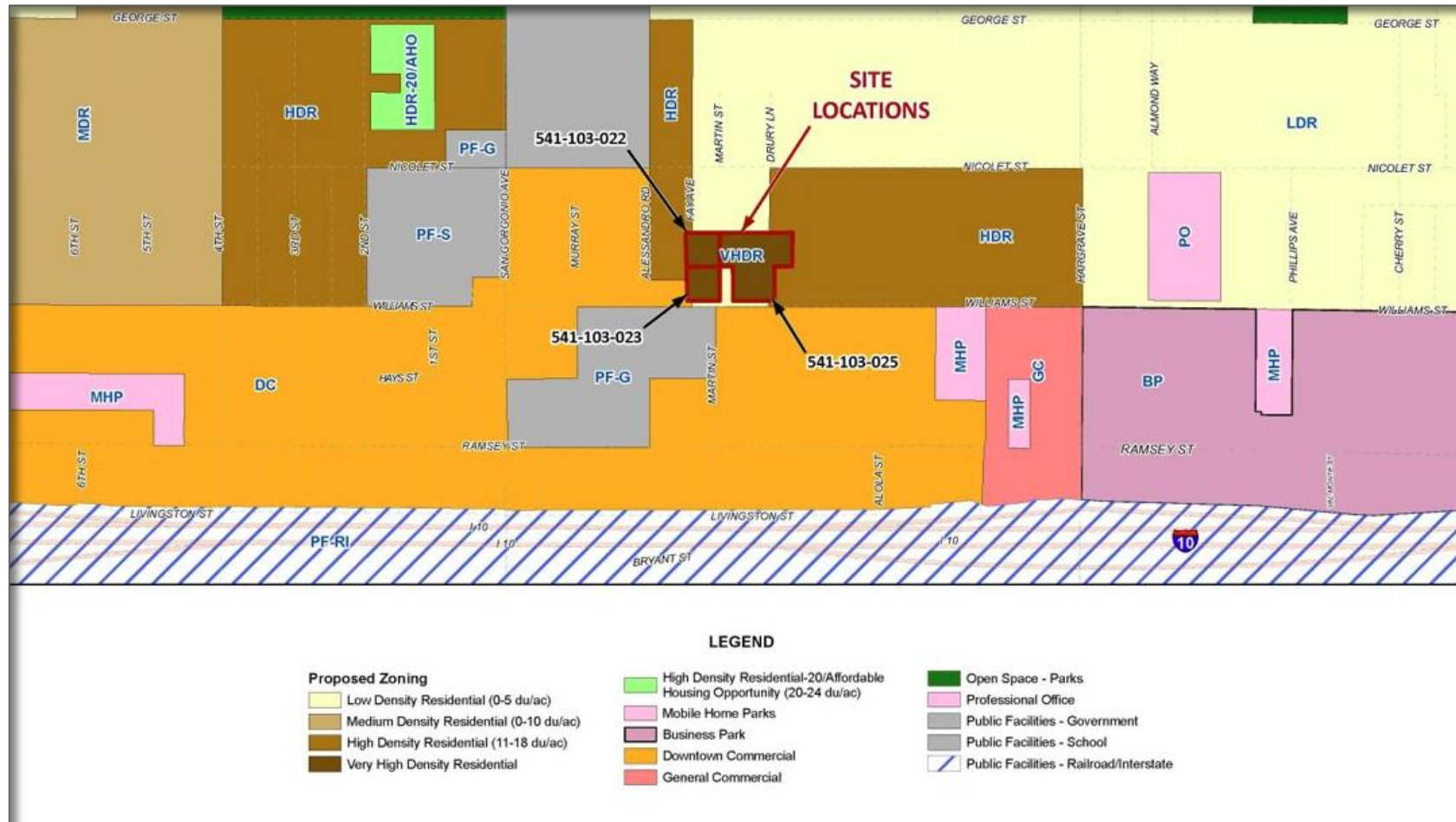
## Rezoned VLDR (9/13/22)



# Housing Element Update



## Rezoned VLDR (9/13/22)

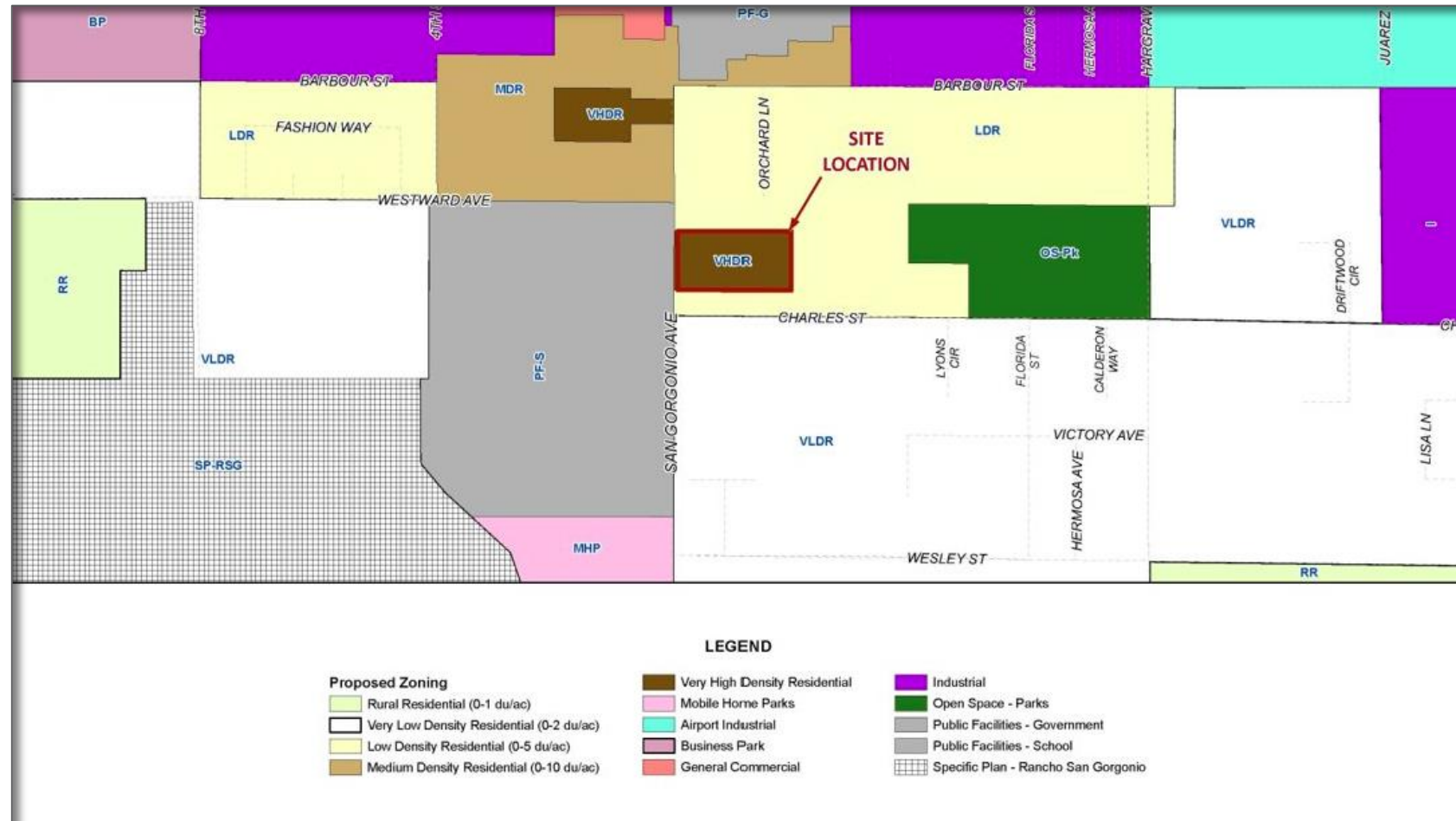




# Housing Element Update



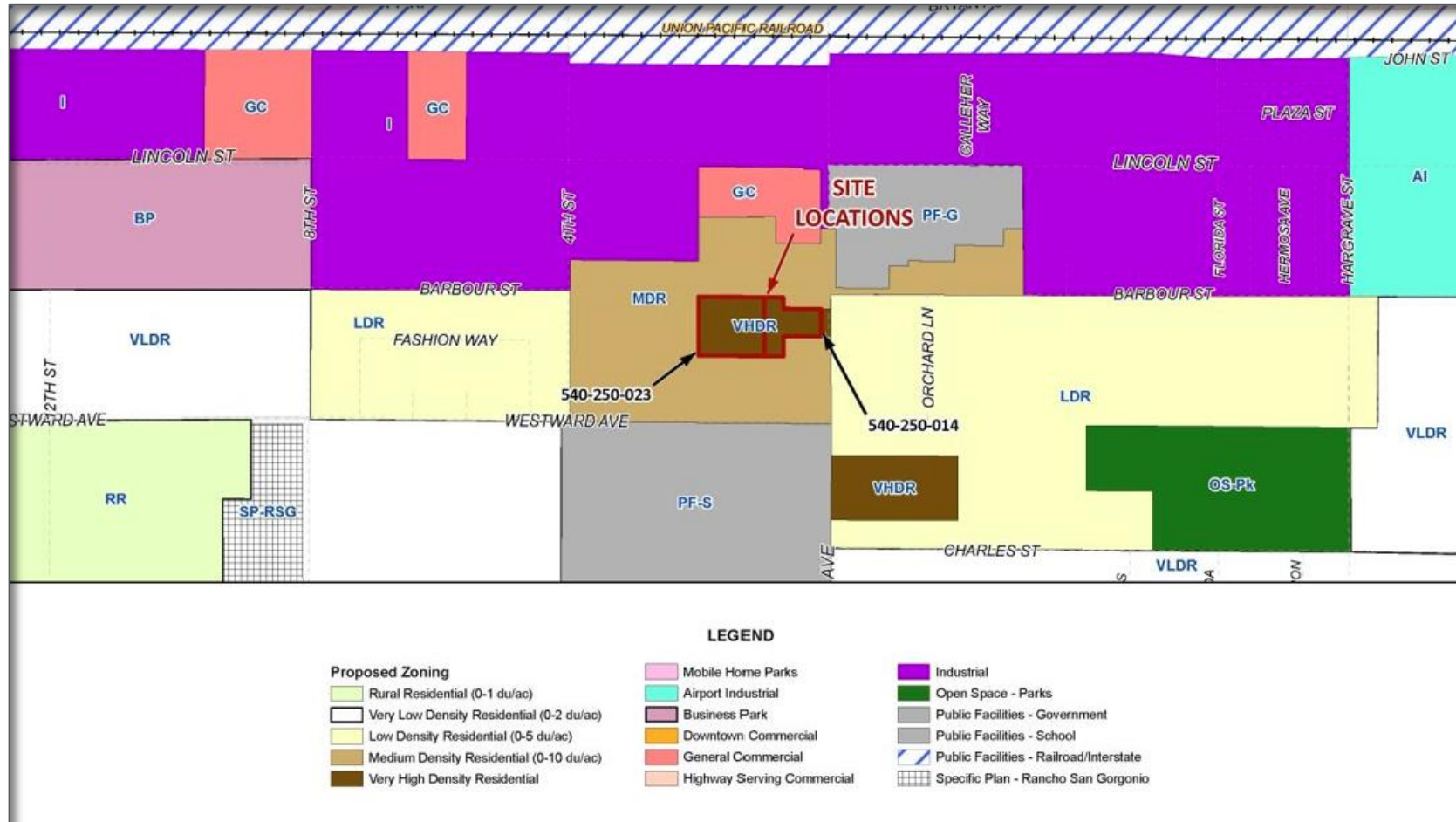
## Rezoned VLDR (9/13/22)



# Housing Element Update



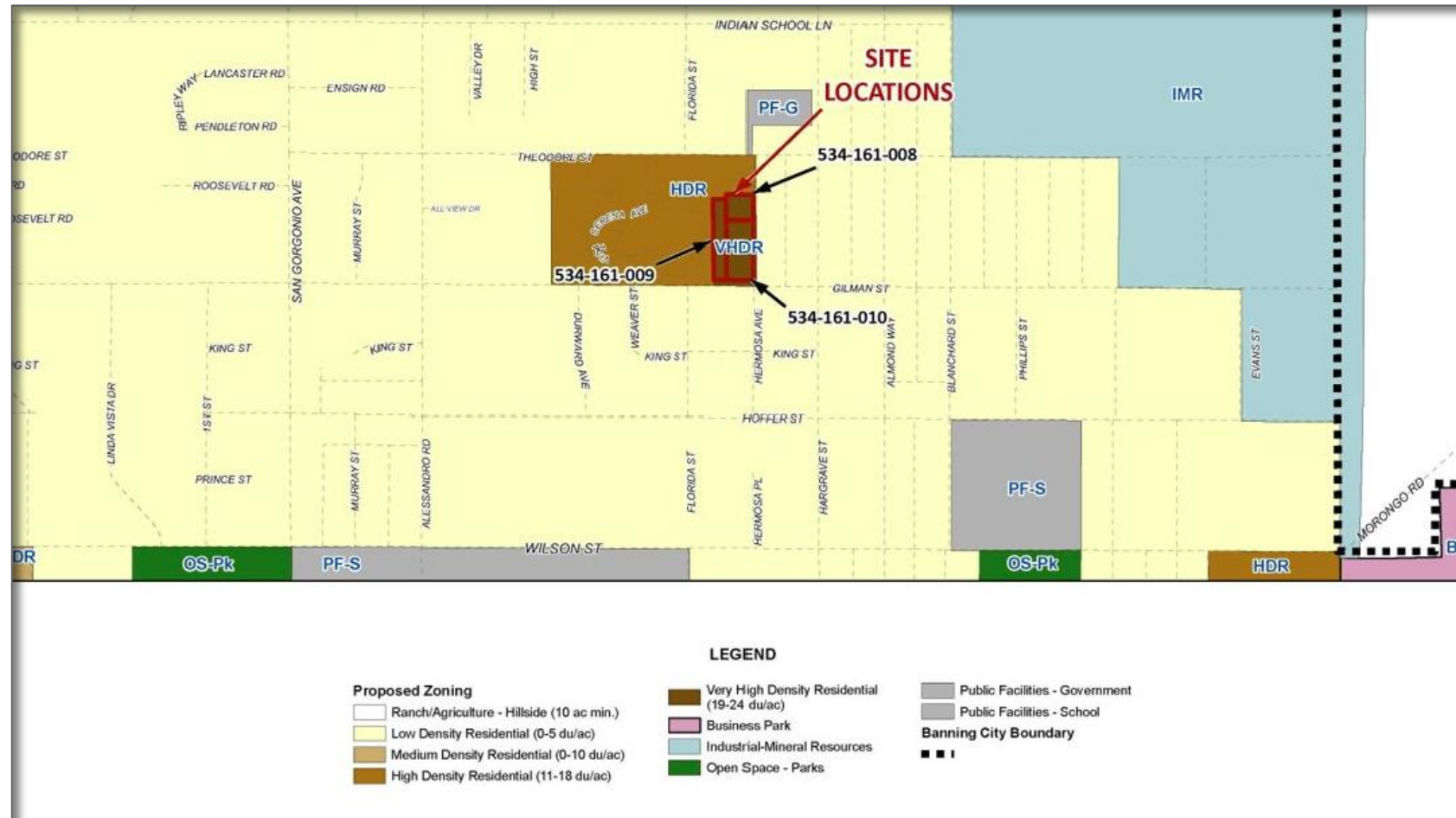
## Rezoned VLDR (9/13/22)



# Housing Element Update



## Rezoned VLDR (9/13/22)

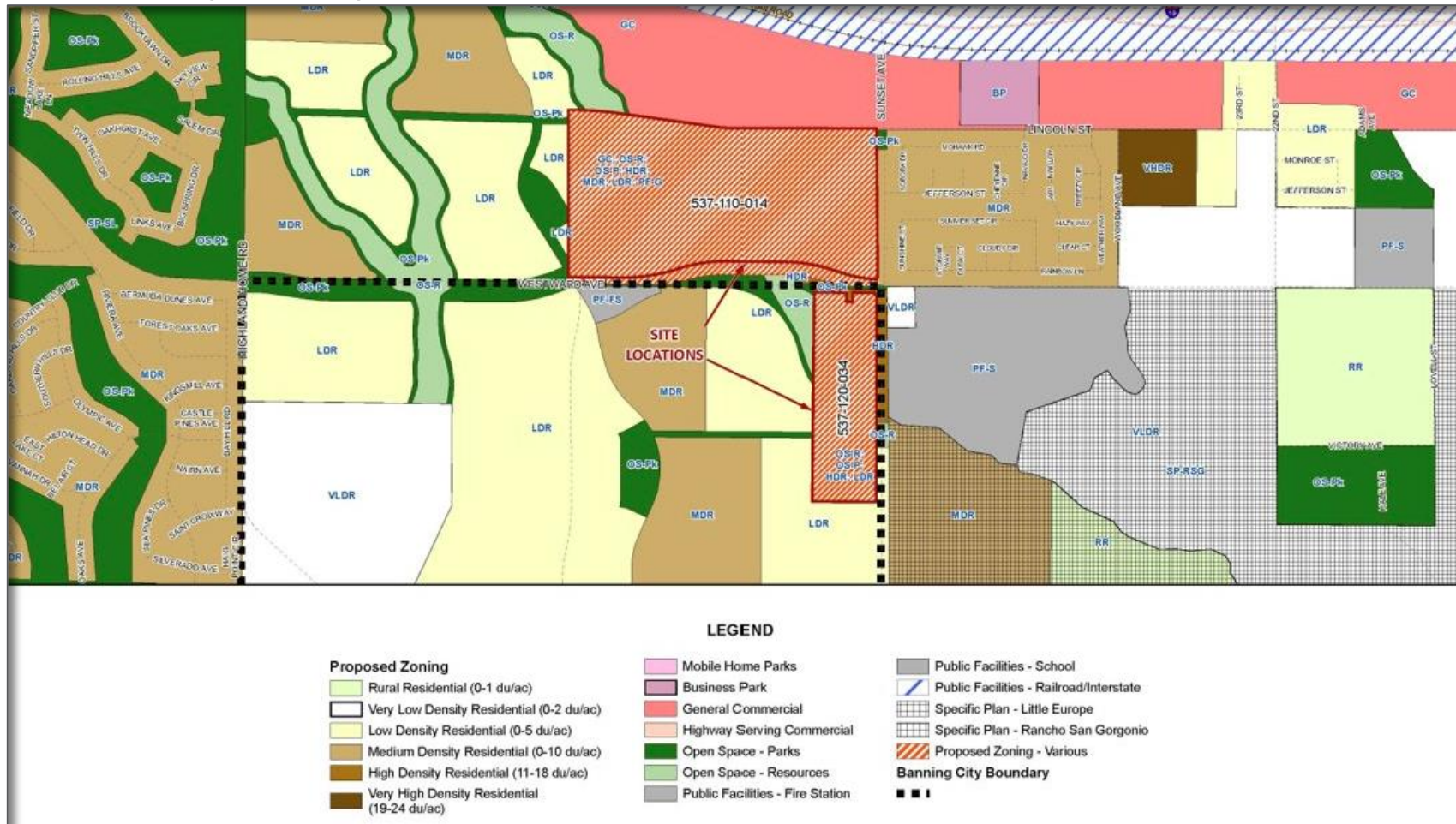




# Housing Element Update



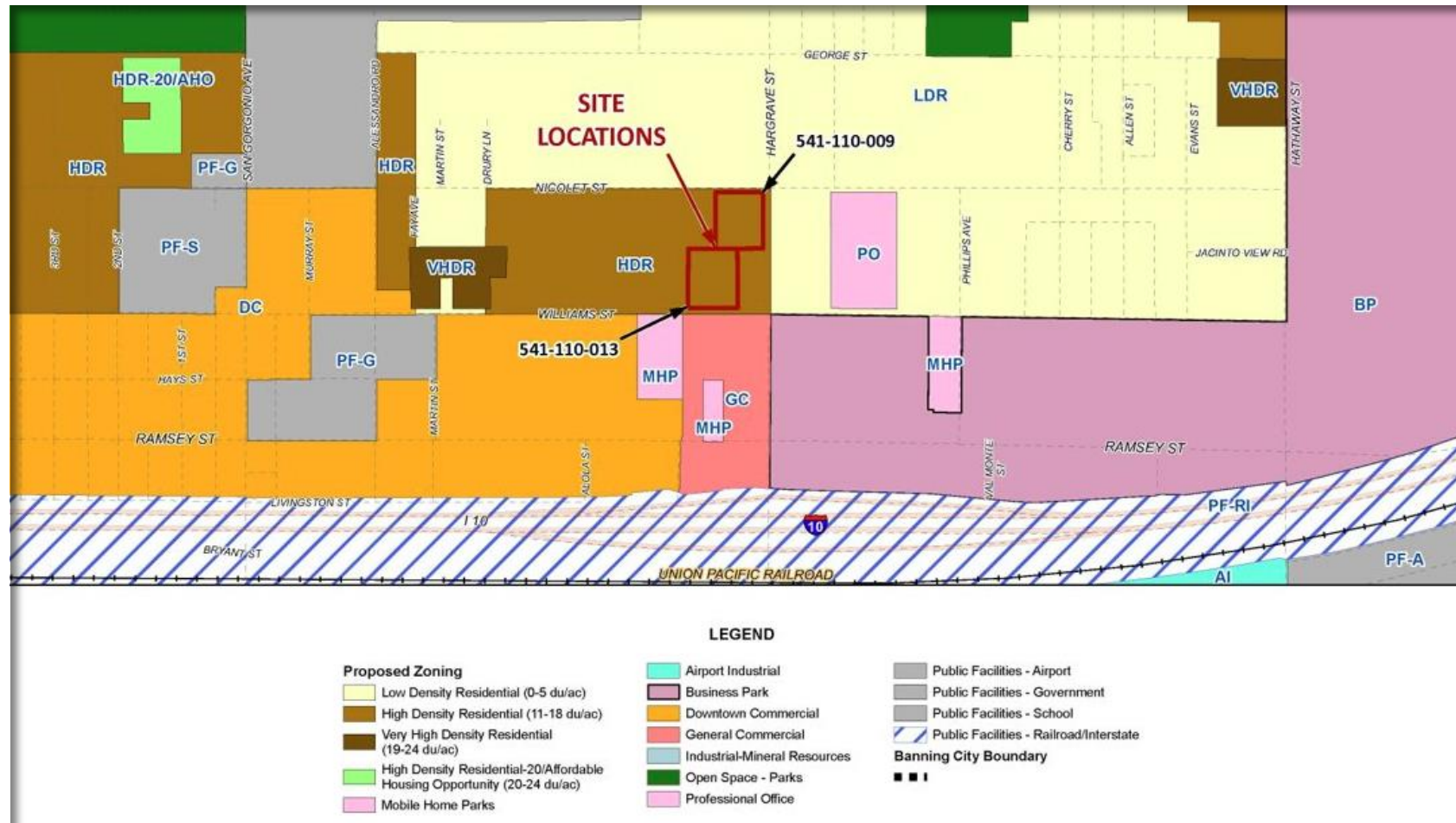
## Rezoned HDR (9/13/22)



# Housing Element Update



## Rezoned HDR (9/13/22)





# Housing Element Update



## Development Capacity of Rezoned Sites

Midpoint Increase of Units for  
Sites Rezoned VLDR = **425**

Midpoint Increase of Units for  
Sites Rezoned HDR = **-158**

Net Increase in Units Under  
Combined Rezone = **267**

**Net Combined Rezone** as % of  
Combined Lower Income RHNA =  
 $(510 - 267) / 510 = 47.65\%$

| Assessor<br>Parcel<br>Number                        | Previous APN | Parcel Size<br>(Acres) | Current<br>General Plan<br>Designation | Current<br>Zoning        | Maximum<br>Units Allowed<br>(E) | Proposed<br>Zoning        | Minimum Units<br>Required (P) | Midpoint<br>Units Allowed<br>(P) | Maximum<br>Units<br>Allowed (P) | Vacant/<br>Nonvacant         |
|---|--------------|------------------------|--|--------------------------|---------------------------------|---------------------------|-------------------------------|----------------------------------|---------------------------------|------------------------------|
| VERY HIGH DENSITY RESIDENTIAL (VHDR) PARCEL CHANGES |              |                        |  |                          |                                 |                           |                               |                                  |                                 |                              |
| 537020008   |              | 4.06                   | LDR                                    | LDR                      | 20.30                           | VHDR (19-24)              | 77.13                         | 87.27                            | 97.42                           | Vacant                       |
| 538250004   |              | 9.25                   | LDR                                    | LDR                      | 46.24                           | VHDR (19-24)              | 175.70                        | 198.82                           | 221.94                          | Vacant                       |
| 541094020   |              | 2.29                   | LDR                                    | LDR                      | 11.47                           | VHDR (19-24)              | 43.60                         | 49.34                            | 55.08                           | Vacant                       |
| 541103022   |              | 0.56                   | LDR                                    | LDR                      | 2.78                            | VHDR (19-24)              | 10.55                         | 11.94                            | 13.33                           | Vacant                       |
| 541103023   |              | 0.55                   | LDR                                    | LDR                      | 2.73                            | VHDR (19-24)              | 10.37                         | 11.73                            | 13.10                           | Vacant                       |
| 541103025   |              | 1.89                   | LDR                                    | LDR                      | 9.46                            | VHDR (19-24)              | 35.95                         | 40.68                            | 45.41                           | Vacant                       |
| 543060002   |              | 4.71                   | LDR                                    | LDR                      | 23.57                           | VHDR (19-24)              | 89.56                         | 101.35                           | 113.13                          | Vacant                       |
| 540250014   |              | 1.29                   | MDR                                    | MDR                      | 12.87                           | VHDR (19-24)              | 24.45                         | 27.68                            | 30.88                           | Vacant                       |
| 540250023   |              | 2.26                   | MDR                                    | MDR                      | 22.55                           | VHDR (19-24)              | 42.85                         | 48.49                            | 54.12                           | Vacant                       |
|   |              | 26.85                  |  |                          | 151.96                          |                           | 510.15                        | 577.28                           | 644.40                          | Net Gain/Loss (+/-)          |
| HDR-20/AHO ZONING OVERLAY PARCEL CHANGES            |              |                        |  |                          |                                 |                           |                               |                                  |                                 |                              |
| 532080007   | 532-080-004  | 215.46                 | HDR                                    | HDR-20/AHO               | 0.00                            | OS-R                      | 0.00                          | 0.00                             | 0.00                            | Vacant                       |
| 534161008   |              | 0.40                   | HDR                                    | HDR-20/AHO               | 10.80                           | VHDR (19-24)              | 7.60                          | 8.60                             | 9.60                            | Vacant                       |
| 534161009   |              | 0.61                   | HDR                                    | HDR-20/AHO               | 16.47                           | VHDR (19-24)              | 11.59                         | 13.12                            | 14.64                           | Vacant                       |
| 534161010   |              | 0.91                   | HDR                                    | HDR-20/AHO               | 24.57                           | VHDR (19-24)              | 17.29                         | 19.57                            | 21.84                           | Vacant                       |
| 537110014   | 532-110-008  | 9.00                   | HDR                                    | HDR-20/AHO               | 243.00                          | HDR (11-18)               | 99.00                         | 135.00                           | 182.00                          | Vacant                       |
| 537120034   |              | 9.20                   | HDR                                    | HDR-20/AHO<br>(Pre-Zone) | 221.40                          | HDR (11-18)<br>(Pre-Zone) | 90.20                         | 123.00                           | 147.60                          | Nonvacant                    |
| 541110009   |              | 1.60                   | HDR                                    | HDR-20/AHO               | 43.20                           | HDR (11-18)               | 17.60                         | 24.00                            | 28.80                           | Vacant                       |
| 541110013   |              | 1.68                   | HDR                                    | HDR-20/AHO               | 45.36                           | HDR (11-18)               | 18.48                         | 25.20                            | 30.24                           | Vacant                       |
|   |              | 237.86                 |  |                          | 383.40                          |                           | 171.56                        | 225.48                           | 267.12                          | Net Gain/Loss (+/-)          |
|   |              | 264.71                 |  |                          | 535                             |                           | 682                           | 803                              | 912                             | Total Net Gain/Loss<br>(+/-) |

# Housing Element Update



## Examples of Density Configurations



**25 units per acre**

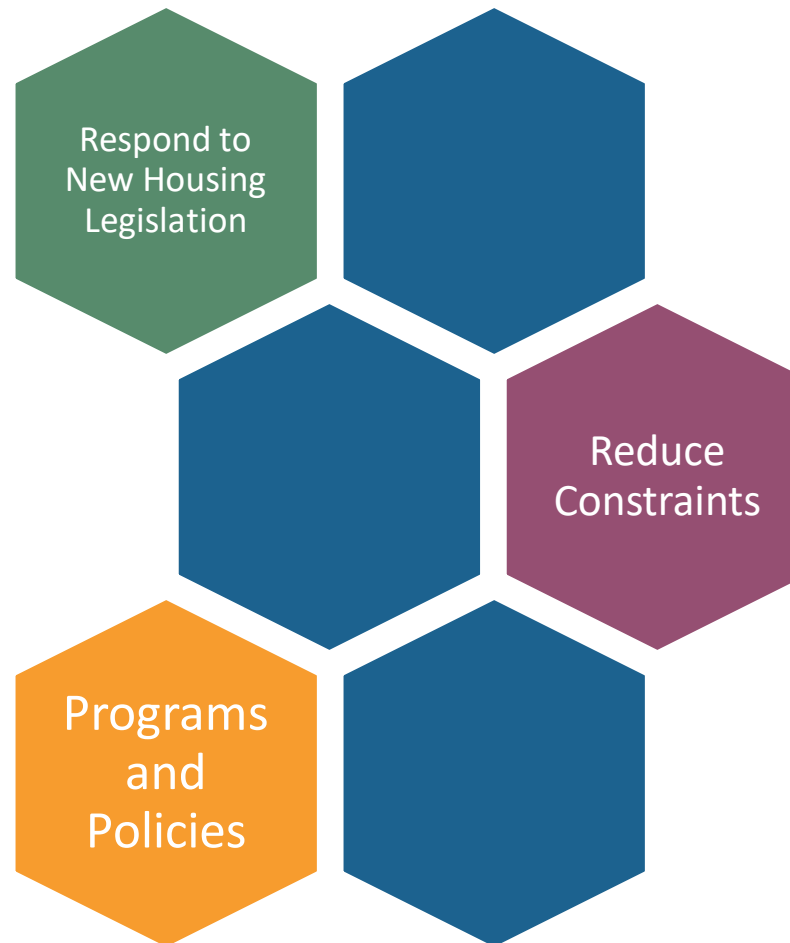


**43 units per acre**



## Other Ways that Banning Will Support Housing Development

- ***Reduce constraints*** to housing development.
- **Respond to new legislation.**
- ***Programs and policies*** to enhance housing opportunities, especially for special needs populations.



# Housing Element Update



## New Programs

Affirmatively  
Furthering Fair  
Housing

Sites Monitoring  
(No Net Loss)

Supportive Housing  
Zoning Updates

Accessory Dwelling  
Unit Zoning Updates

Emergency Housing  
/ Transitional  
Housing Zoning  
Updates

# Housing Element Update



## Newly Proposed/Approved Projects

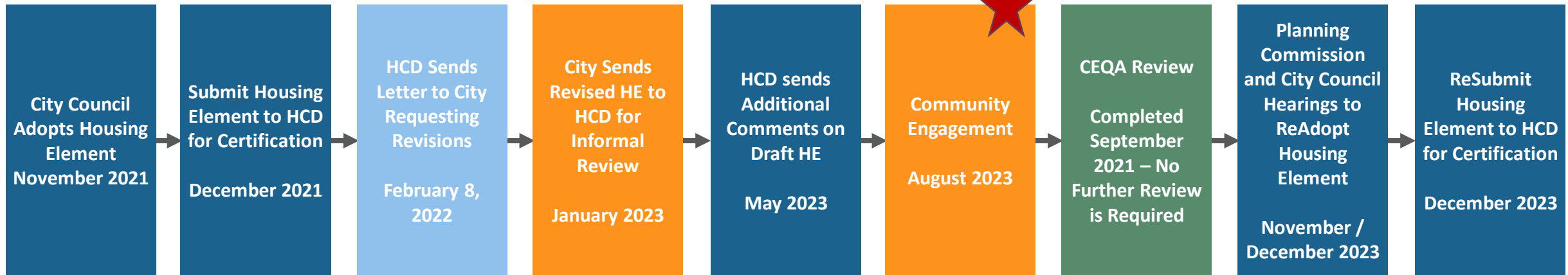
Proposed Habitat for  
Humanity 4 Lot  
Subdivision

Approved Crestwood  
Communities  
Canterbury (19 Lots)

Approved Crestwood  
Communities  
Banning 56

Approved  
WJK Development  
196 Duplex Units w/  
9 VLI Units

Approved Downtown  
Commercial Mixed-  
Use Zoning  
Amendment





## Remaining Items to Achieve Certification



- Complete the rezoning of remaining inventory sites designated for VLDR and HDR (must be completed within HCD 60-day review period)
- Complete a Zoning Text Amendment (ZTA) modifying Title 17 (Zoning) of the Banning Municipal Code to create Development Standards for the VLDR Zone (must be completed within HCD 60-day review period)
- Post-Readoption, the Final Draft 6<sup>th</sup> Cycle Housing Element must be placed on the City's Website for a minimum of seven days to solicit public review and comment prior to submittal to HCD for Certification Review (CA Gov. Code Section 65585(b)(1))



# Housing Element Update Notifications



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Here we offer meeting dates, agendas, and minutes from past meetings.

**Public Records Request**  
Make a public records request.

**Parks & Recreation**  
Register for Recreation Programming

**Report a Concern**  
Report water waste, graffiti, animal control issues, code enforcement, etc.

# Housing Element Update



## Your Input Is Needed!

- Comment on the Draft Housing Element Update:  
November 2023

<http://banning.ca.us/>

Adam Rush: [arush@banningca.gov](mailto:arush@banningca.gov)

Emery Papp: [epapp@banningca.gov](mailto:epapp@banningca.gov)

# Housing Element Update





# Thank you for your time!

City of Banning Community Development  
Rincon Consultants, Inc.





## CITY OF BANNING STAFF REPORT

**TO:** PLANNING COMMISSION

**FROM:** Adam B. Rush, Community Development Manager

**MEETING DATE:** October 18, 2023

**SUBJECT:** Planning Commission Public Workshop on 6th Cycle Housing Element Update

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### **RECOMMENDATION:**

That the Planning Commission conduct a Public Workshop on the 6<sup>th</sup> RHNA Cycle Housing Element Update. Solicit public testimony and file the staff report.

### **BACKGROUND:**

The City has begun the 6th Cycle Housing Element Update and is requesting that the Planning Commission hold a Public Workshop to receive public input and discuss the Housing Element Update process.

#### Housing Element Overview

Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. California's local governments are required to prepare a Housing Element, which is one of the seven required elements of the General Plan.

The Housing Element must be updated approximately every 8 years, and it is the role of the Department of Housing and Community Development (HCD) to administer and ensure local government compliance with Housing Element law. HCD is now administering the 6th Cycle Housing Element. For Banning and other local governments within the Southern California Association of Council of Governments (SCAG)<sup>1</sup>, the 6th Cycle covers the period from June 30, 2023, to December 31, 2031.

The Draft 6<sup>th</sup> Cycle Housing Element has been under HCD for several months. The Planning Commission previously adopted the *Tentatively Certified Housing Element* in October of 2022. However, during the final Certification period, HCD responded with an expanded list of comments that have now been responded to and are available for review and consideration.

---

<sup>1</sup> SCAG serves as the assigned *Metropolitan Planning Organization* (MPO)

To comply with State law, each jurisdiction's Housing Element must be updated to ensure its policies and programs can accommodate its share of the number of housing units identified by the State.

- ✓ The Housing Element update includes the following steps:
- ✓ Determine the Regional Housing Needs Assessment (RHNA)
- ✓ Update previous Housing Element
- ✓ Publish Draft Housing Element for a 30-day Public Review Period
- ✓ Submit Draft Housing Element to HCD for review
- ✓ Revise Draft Housing Element pursuant to HCD comments
- ✓ Adopt Housing Element (Planning Commission and City Council)
- ✓ Submit Adopted Housing Element to HCD for Certification
- ✓ Regional Housing Needs Assessment (RHNA)

HCD begins the RHNA process by setting the total number of new housing units needed for the State during the 6th Cycle. HCD then disaggregates the total number of new housing units by income group: Very Low, Low, Moderate, and Above-Moderate Income. Next, HCD distributes those numbers to each region within the State. For the SCAG region, HCD allocated a total of 1,341,827 new housing units, which was distributed to all 197 SCAG jurisdictions, for this 6th Cycle Housing Element period.

SCAG then takes the lead and establishes a methodology for allocating the units across the local jurisdictions within its region. SCAG started its part of the 6th Cycle RHNA process in 2021. Banning actively participated in that process, through our representatives at RCTC, and provided comments to SCAG on the RHNA process during the various meetings. The Final RHNA Plan was adopted by the SCAG Policy Board on August 16, 2022.

For Banning, the RHNA allocation is:

|   |       |
|---|-------|
| Total RHNA Units for Banning  | 1,653 |
|   |       |
| Very Low Income (<50% of AMI*)  | 337   |
|   |       |
| Low Income (50-80% of AMI)  | 113   |
|   |       |
| Moderate Income (80-120% of AMI)  | 300   |
|   |       |
| Above Moderate Income (>120% of AMI)                                      | 903   |
| *AMI = Area Median Income, based on the Riverside County Average Incomes. |       |

Key components of the Housing Element include:

- ✓ A demographic profile and analysis of population growth and trends in the community;
- ✓ Identification and analysis of existing and projected housing needs for all economic segments of the community;
- ✓ Identification of adequate sites that are zoned and available within the 8-year housing cycle to meet the City's fair share of regional housing needs at all income levels, as prescribed by the RHNA;
- ✓ An evaluation of local constraints or barriers to housing development as well as opportunities to develop housing; and
- ✓ Housing goals, policies, quantified objectives, and scheduled programs to preserve, improve and develop housing within the City.

### Site Inventory

As part of the Housing Element Update process, the City will be identifying adequate sites to accommodate the 1,653 new units, particularly "affordable" units that would be available to 113 low and 337 very-low and low-income households.

To identify a housing site as "affordable", a Housing Element needs to provide analysis demonstrating that adopted densities, costs, financial subsidies and/or market demand can accommodate lower income households. In Banning, data for this analysis is limited from the previous planning period due to the lack of housing activity in general. As an option and alternative to preparing the analysis, California Government Code Section 65583.2(c)(3)(B) allows local governments to elect the option to utilizing "default" density standards that are "deemed appropriate to accommodate housing for lower income households."

The default density standard provides a streamlined option for local governments to meet the density requirement. If a local government zones a site to meet the default density, no analysis to establish the appropriateness of the default density is required and HCD must accept that density as appropriate in its review. Banning and the surrounding cities in the region are designated as "Metropolitan Jurisdictions". This means that Banning must identify sufficient sites that have a density of no less than 30 dwelling units per acre for the very-low and low-income categories.

Banning has used the default density strategy in its previous Housing Element to successfully meet its RHNA requirements for very-low and low-income housing. Additionally, Banning successfully satisfied its moderate and above moderate RHNA allocation by identifying sites that allow for Low Density Residential and Medium Density Residential developments.



Potential sites to satisfy the affordable requirements should have:

- ✓ Reasonable access to infrastructure, including roads, sewer, and water;
- ✓ Topography with slopes less than 10%;
- ✓ Limited geologic constraints;
- ✓ Limited biological resources; and
- ✓ Adequately sized to accommodate housing development (e.g., avoiding sites that are too small to realistically develop).

Staff will be presenting information on sites that potentially meet these criteria, including but not limited to:

- ✓ City owned undeveloped properties.
- ✓ Undeveloped privately owned residentially zoned properties.
- ✓ Undeveloped privately owned non-residentially zoned properties (e.g., Mixed Use).
- ✓ Underutilized developed commercial properties that could be rezoned to a mixed-use density.

## Public Participation

Public participation is an important component of the Housing Element Update process. The City is required to make diligent effort to include all economic segments of the community (including residents and/or their representatives) in the development and update of the Housing Element.

This workshop is the start of the process for Banning 6th Cycle Housing Element Update. A public notice informing the public about the workshop and inviting their participation was published in the Record Gazette on October 6, 2023. Additionally, the City's social media pages have been updated.

The public outreach process will continue during the next few months as the City works to complete the draft Housing Element Update.

## **ATTACHMENTS:**

1. Banning Housing Element HCD Comment Tracker Post-Adoption Comments.  
[https://www.banningca.gov/DocumentCenter/View/13618/-Banning-Housing-Element-HCD-Comment-Tracker\\_Post-Adoption-Comments](https://www.banningca.gov/DocumentCenter/View/13618/-Banning-Housing-Element-HCD-Comment-Tracker_Post-Adoption-Comments)
2. Public Hearing Notice.  
<https://www.banningca.gov/Archive.aspx?ADID=2916>

Prepared by:

*Adam B. Rush, AICP*

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Adam Rush, AICP

Community Development Director

# Appendix B

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Sites Inventory

| Site<br>Address/Intersection | Assessor<br>Parcel<br>Number | General Plan<br>Designation | Zoning | Existing<br>Site Use | Parcel Size<br>(Acres) | Minimum<br>Density<br>Allowed<br>(Proposed) | Maximum<br>Density<br>Allowed<br>(Proposed) | Minimum<br>Unit<br>Capacity | Very Low-<br>Income Units | Low-Income<br>Units | Moderate-<br>Income<br>Units | Above<br>Moderate-<br>Income<br>Units |
|------------------------------|------------------------------|-----------------------------|--------|----------------------|------------------------|---|---|-----------------------------|---------------------------|---------------------|------------------------------|---------------------------------------|
| W Jacinto View Rd.           | 537020008                    | VHDR                        | VHDR   | Vacant               | 4.06                   | 24  | 30  | 97                          | 57                        | 20                  | 20                           | 0                                     |
| S Woodland Ave.              | 538250004                    | VHDR                        | VHDR   | Vacant               | 9.25                   | 24  | 30  | 222                         | 111                       | 85                  | 25                           | 0                                     |
| E George St.                 | 541094020                    | VHDR                        | VHDR   | Vacant               | 2.30                   | 24  | 30  | 55                          | 36                        | 19                  | 0                            | 0                                     |
| E Williams St.               | 541103022                    | VHDR                        | VHDR   | Vacant               | 0.56                   | 24  | 30  | 13                          |                           |                     | 13                           | 0                                     |
| E Williams St.               | 541103023                    | VHDR                        | VHDR   | Vacant               | 0.55                   | 24  | 30  | 13                          |                           |                     | 13                           | 0                                     |
| E Williams St.               | 541103025                    | VHDR                        | VHDR   | Vacant               | 1.89                   | 24  | 30  | 45                          | 30                        | 15                  | 0                            | 0                                     |
| S San Gorgonio Ave.          | 543060002                    | VHDR                        | VHDR   | Vacant               | 4.71                   | 24  | 30  | 113                         | 38                        | 39                  | 36                           | 0                                     |
| S San Gorgonio Ave.          | 540250014                    | VHDR                        | VHDR   | Vacant               | 1.29                   | 24  | 30  | 31                          | 20                        | 10                  | 0                            | 0                                     |
| S San Gorgonio Ave.          | 540250023                    | VHDR                        | VHDR   | Vacant               | 2.26                   | 24  | 30  | 54                          | 36                        | 18                  | 0                            | 0                                     |
| N Hermosa St.                | 534161008                    | VHDR                        | VHDR   | Vacant               | 0.40                   | 24  | 30  | 10                          |                           |                     | 9                            | 0                                     |
| N Hermosa St.                | 534161009                    | VHDR                        | VHDR   | Vacant               | 0.61                   | 24  | 30  | 15                          |                           |                     | 14                           | 0                                     |
| N Hermosa St.                | 534161010                    | VHDR                        | VHDR   | Vacant               | 0.91                   | 24  | 30  | 22                          | 14                        | 7                   | 0                            | 0                                     |
| S Sunset Ave.                | 537110014                    | HDR                         | HDR    | Vacant               | 9.00                   | 11  | 18  | 99                          |                           |                     | 49                           | 50                                    |
| S Sunset Ave.                | 537120034                    | HDR                         | HDR    | Vacant               | 8.20                   | 11  | 18  | 90                          |                           |                     | 45                           | 45                                    |
| E Nicolet St.                | 541110009                    | HDR                         | HDR    | Vacant               | 1.60                   | 11  | 18  | 18                          |                           |                     | 9                            | 8                                     |
| E Williams St.               | 541110013                    | HDR                         | HDR    | Vacant               | 1.68                   | 11  | 18  | 18                          |                           |                     | 9                            | 9                                     |
| <b>Total</b>                 |                              |                             |        |                      |                        |   |   | <b>916</b>                  | <b>342</b>                | <b>213</b>          | <b>242</b>                   | <b>112</b>                            |

# Appendix C

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Affirmatively Furthering Fair Housing (AFFH)

# Appendix C: Affirmatively Furthering Fair Housing (AFFH)

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## Introduction and Overview of AB 686

In January 2017, Assembly Bill 686 (AB 686) introduced an obligation to AFFH into California State law. AB 686 defines “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. AB 686 added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities; an assessment of contributing factors; and an identification of fair housing goals and actions.

AB 686 supplements the existing Fair Housing Act, which prohibits discrimination by direct providers of housing, such as landlords and real estate companies as well as other entities, such as municipalities, banks or other lending institutions and homeowner’s insurance companies whose discriminatory practices make housing unavailable to persons because of:

- Race or color
- Religion
- Sex
- National origin,
- Familial status, or
- Disability

## Community Outreach

As part of the Housing Element Update, the City implemented a community engagement program, soliciting input from the general public, housing stakeholders, and City decision makers. Results and feedback obtained during the community engagement program have been incorporated into the Housing Element, including this section on AFFH practices. Please see Chapter 1 for more details on the City’s outreach efforts.

## Summary of Fair Housing Issues

### County of Riverside Trends

As part of the Community Development Block Grant (CDBG) program certification process, participating jurisdictions must prepare an analysis of impediments to fair housing choice every five years. The Riverside Regional Analysis of Impediments to Fair Housing Choice (County of Riverside AI), is an assessment of the Riverside County regional laws, ordinances, statutes, and administrative policies, as well as local conditions that affect the location, availability, and accessibility of housing. It also analyzes the conditions in the private market and public sector that may limit the range of housing choices or

impede a person's access to housing, and provides solutions and measures that will be pursued to mitigate or remove identified impediments. The County of Riverside AI provides a comparative demographic profile of Riverside County; assesses the extent of housing needs among specific income groups; and evaluates the availability of a range of housing choices for residents. Regionally, the County of Riverside AI identifies the following impediments to fair housing:

- Hispanic and Black residents continue to be underrepresented in the homebuyer market and have experienced large disparities in loan approval rates
- Concentrations of housing choice voucher use have occurred due to the geographic disparity of rental prices
- Housing choices for special needs groups, especially persons with disabilities, are limited
- Fair housing enforcement activities are limited – despite laws prohibiting discrimination, residents can experience housing bias on the basis of physical disability, race, and ethnicity
- Nearly 63 percent of all fair housing complaints in Riverside County over the last five years were on the basis of disability
- Today, people obtain information on housing options and availability through many media forms, not limited to traditional newspaper noticing or other print forms

## Fair Housing Outreach and Enforcement

Fair housing enforcement and outreach capacity relates to the ability of a local jurisdiction and fair housing entities to disseminate information related to fair housing and provide outreach and education to assure community members are informed of fair housing laws, housing programs, and tenants' rights. In addition, enforcement and outreach capacity includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The City of Banning addresses fair housing needs by contracting with the FHCRC, a non-profit organization to counsel property owners, managers, tenants, and homebuyers on fair housing related issues. Various services are implemented through this partnership including:

- Providing tenant/landlord counseling to all citizens;
- Responding to all citizens complaints regarding violations of the fair housing laws;
- Promoting community awareness of fair housing rights and responsibilities;
- Monitoring fair housing legislation, attending training and reporting to the City; and
- Serving as an overall fair housing resource for the area, including implementation of an affirmative fair housing market plan.

The City of Banning provides two Government Cable Access Channels (Charter Cable Channel 10, and Frontier Cable Channel 29), a Facebook page, and a "Notify Me" subscription service for information related to housing programs. The specific objective of these channels is to increase citizens' awareness in all areas of municipal government and provide an outlet to inform, educate, and encourage civic engagement. Not-for-profit groups are permitted to fill out applications for conducting community services announcements related to raising awareness of community housing programs. In addition to the Government Cable Access Channels, the City of Banning has a social media presence using Facebook to share community service announcements related to housing resources and assistance programs for special needs households. Similarly, a related Facebook site, The Banning Informer, can be used to share information about available housing programs both provided by the City and partnering groups and



organizations. The City's website has a "Notify Me" subscription, which when subscribed will inform participants of information related to a specific item. The City's newsletter is an example item which may contain information on housing assistance programs, public meeting agendas, and City of Banning News Flash.

The County of Riverside contracts with the non-profit organization Fair Housing Council of Riverside County, Inc. (FHCRC) to address fair housing complaints and engage the community around fair and affordable housing issues. These organizations help coordinate the development of the County of Riverside AI, including the outreach process. Table 1 shows the local housing and social service organizations that are active in the County as part of the FHCRC.

**Table 1 Fair Housing Organizations Active in Riverside County**

| Organization   | Focus  |
|--|--|
| County of Riverside Department of Public Social Services | Homeless services                                  |
| Workforce Development                                    | Employment Services                                |
| Housing Authority Riverside                              | Public housing services                            |
| Fair Housing Council of Riverside County (FHCRC)         | Fair housing services                              |
| National Alliance on Mental Illness                      | Mental health services                             |
| Regional Task Force on the Homeless                      | Services for individuals experiencing homelessness |
| Southern California Rental Housing Association           | Rental assistance                                  |
| Source: Riverside County 2020                            |  |

Table 2 lists organizations active in the City of Banning that offer fair housing support and services.

**Table 2 Fair Housing Organizations Active in Banning**

| Organization   | Focus  |
|--|--|
| California Department of Fair Employment and Housing | State Resource for fair employment and housing     |
| Housing and Economic Rights Advocates                | Fair Housing advocacy                              |
| Jamboree Housing                                     | Developer of affordable housing                    |
| Riverside Housing Development Corporation            | Developer of affordable housing                    |
| H.E.L.P. Inc.  | Services for Individuals experiencing homelessness |
| Southern California Association of Nonprofit Housing | Fair housing advocacy                              |
| Source: Riverside County 2020                        |  |

## County of Riverside Fair Housing Enforcement

From 2015-2020, FHCRC assisted County residents with fair housing discrimination complaints, addressing 3,108 complaints in total, with 95.0 percent of those from in-place tenants, 3.0 percent from landlords or managers, and the balance from other types of complainants. Consistent with state and national trends, the leading bases of complaints in the County included physical disability (51.0 percent), mental disability (12.0 percent), race (10.0 percent), familial status (8.0 percent), national origin

(7.0 percent), and sex (3.0 percent). Taken together, complaints based on disability status accounted for 63.0 percent of all cases in Riverside County.

## City of Banning Fair Housing Enforcement

In 2020, FHCRC assisted one Banning resident with a fair housing complaint related to physical disability. Programs 30 to 33 of the Housing Element direct the City to take actions to overcome patterns of segregation, address disparities in housing needs, and increase access to housing opportunities.

The City of Banning currently complies or will comply with all local State fair housing laws following adoption of this housing element update and following updates to its Zoning Ordinance. Examples of fair housing laws include the following:

- California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2): The City includes Section 12900 in its definition of fair housing laws in Zoning Ordinance Chapter 17.42, which cover fair housing and reasonable accommodations in city housing regulations and development for persons with disabilities.
- FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271): The City abides by all fair housing laws included in this section.
- Government Code section 65008, which covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.
- Government Code section 8899.50, which requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.
- Government Code section 11135 et seq. requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the State, regardless of one's membership or perceived membership in a protected class: The City has procedures for Reasonable Accommodation codified as Section 17.42.040 in its Zoning Ordinance as discussed in Chapter 3, Housing Constraints.
- Density bonus law: The City has the following density bonus provisions in Section 15.60.030 of its Zoning Ordinance: Upon written request to the city, an applicant for a housing development is eligible for one density bonus of twenty percent over the maximum residential density provided that the applicant agrees to construct the housing development in accordance with one of the following criteria: 1. Five percent of the total dwelling units, excluding any units permitted by the density bonus, are provided at affordable rent or ownership costs to very low income households; or 2. Ten percent of the total dwelling units, excluding any units permitted by the density bonus, are provided at affordable rent or ownership costs to lower income households; or 3. A senior citizen housing development. For senior citizen housing developments, the density bonus shall be twenty percent of the number of senior housing units provided. Additionally, the City has targeted the downtown Commercial (DC) area for special incentives for multi-family, single resident occupancy (SRO), and mixed-use development to stimulate revitalization and housing opportunities for lower-income and special needs residents. The City will encourage consolidation of adjacent parcels to enhance development feasibility by providing a lot consolidation density incentive of five percent when two

or more parcels totaling at least 1.0 acre are consolidated. This density incentive is in addition to the density bonus currently allowed.

- No-Net-Loss Law (2017, Gov. Code, Section 65863): The City will monitor the consumption of residential acreage to ensure an adequate inventory and buffer of residential units is available if sites on the residential inventory are not developed with low and moderate-income residential units and rezone additional properties if sites fall below the low and moderate income RHNA allocation. The City will periodically monitor sites. In the event that sites that are identified for lower- or moderate-income RHNA develop with fewer units than assumed in the inventory, the City will prioritize its buffer allocation to accommodate any shortfall.
- Housing Accountability Act (Gov. Code, Section 65589.5.) limits the ability of cities and counties to reject proposed housing development projects that are consistent with local plans and zoning regulations. In order to disapprove a proposed residential development that complies with all applicable objective planning and zoning criteria, the local agency must make written findings, supported by substantial evidence, that the project would have a specific adverse impact on public health or safety, and no feasible means exists to satisfactorily mitigate or avoid the impact. The City complies with this act.

## Fair Housing Analysis

The California Government Code Section 65583 (10)(A)(ii) requires jurisdictions to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

Data on regional and local disparities and trends was gathered from a variety of sources, including HCD's AFFH Viewer, the Healthy Places Index (HPI) and the Urban Displacement Project (UDP). The HPI is a tool that was developed by the Public Health Alliance of Southern California in partnership with the Virginia Commonwealth University's Center on Society and Health in order to predict life expectancy.

Community conditions, also called the "social determinants of health," can be used to predict life expectancy. These conditions include economic stability, neighborhood and built environment, health and access to health care, education, social and community context. The HPI combines 25 community characteristics into a single indexed HPI Score. HPI scores for each census tract can be compared to paint an overall picture of health and well-being.

The UDP was developed as a research initiative by the University of California, Berkeley in partnership with the University of California, Los Angeles. The tool was developed with the intention of tracking neighborhood change and identifying areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level are based on data from the 2015 American Community Survey (ACS).

## Segregation and Integration Patterns and Trends

To inform priorities, policies, and actions, the Housing Element must include an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

## Race and Poverty Concentration

The ethnic and racial composition of a jurisdiction is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, income level, locational preferences, and mobility. To assist in this analysis of race and poverty concentration, HCD and the California Tax Credit Allocation Committee (CTCAC) directed 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 created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9.0 percent Low Income Housing Tax Credits (LIHTCs).” These opportunity maps are made from composite scores of three different domains made up of a set of indicators, as shown in Table 3.

**Table 3 Domain Indicators for Opportunity Areas**

| Domain        | Indicator  |
|---------------|--|
| Economic      | Poverty, Adult Education, Employment, Job Proximity, Median Home Value                     |
| Environmental | CalEnviroScreen 3.0 pollution Indicators and Values  |
| Education     | Math proficiency, Reading proficiency, High school Graduation Rates, Student Poverty Rates |

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

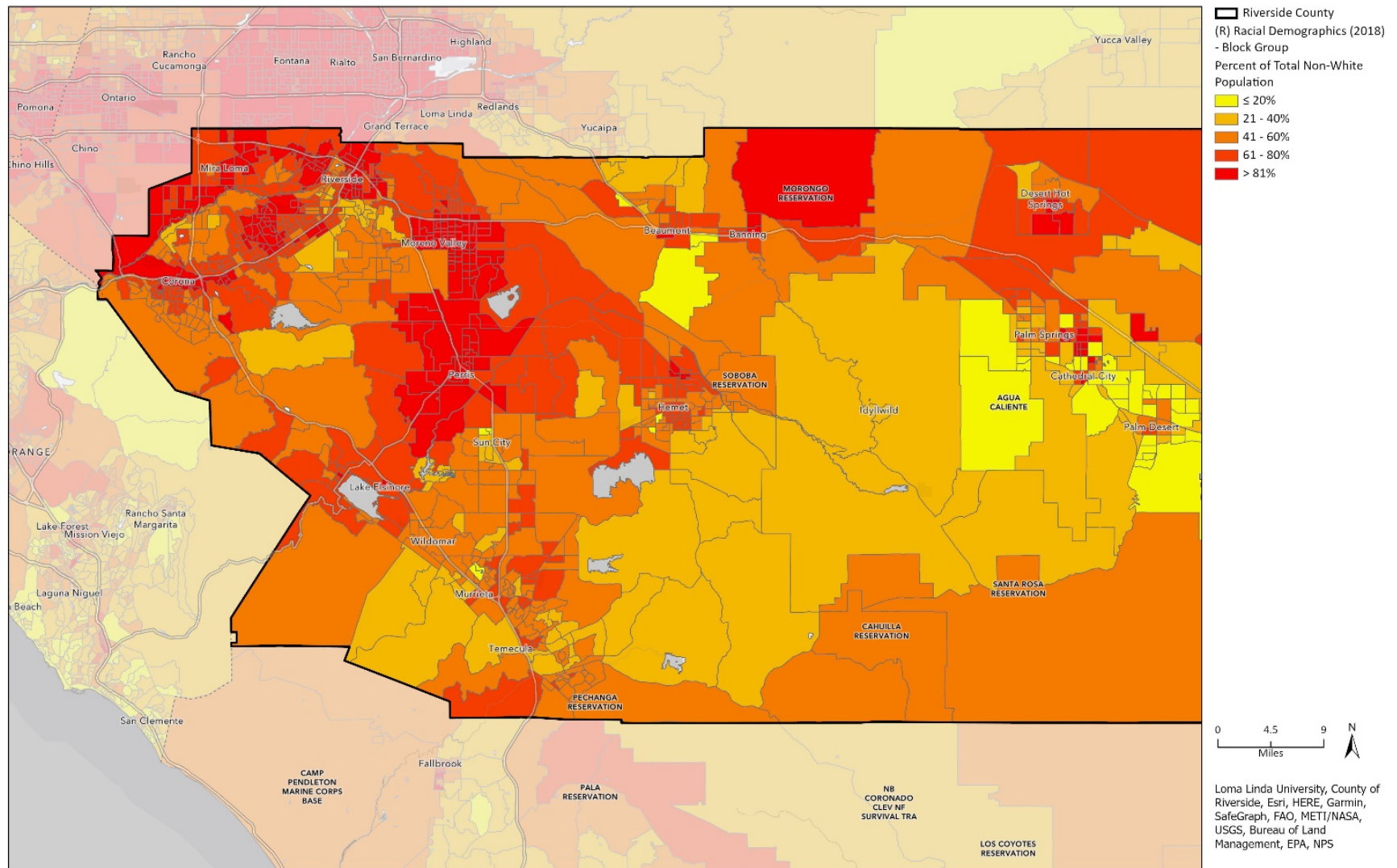
The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty: Tracts with at least 30.0 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Black, Hispanic, Asian, or all non-White residents in comparison to the County

### County of Riverside Minority Concentrated Areas

According to the California Fair Housing Task Force, areas with high segregation are primarily located in the western, urban areas of the County and the Native American reservations in the northern and southern portions of the County, as shown on Figure 1. Hispanic residents make up the highest percentage of racial composition in the County at 45.5 percent of the population.

**Figure 1 Minority Concentrated Areas (County of Riverside)**



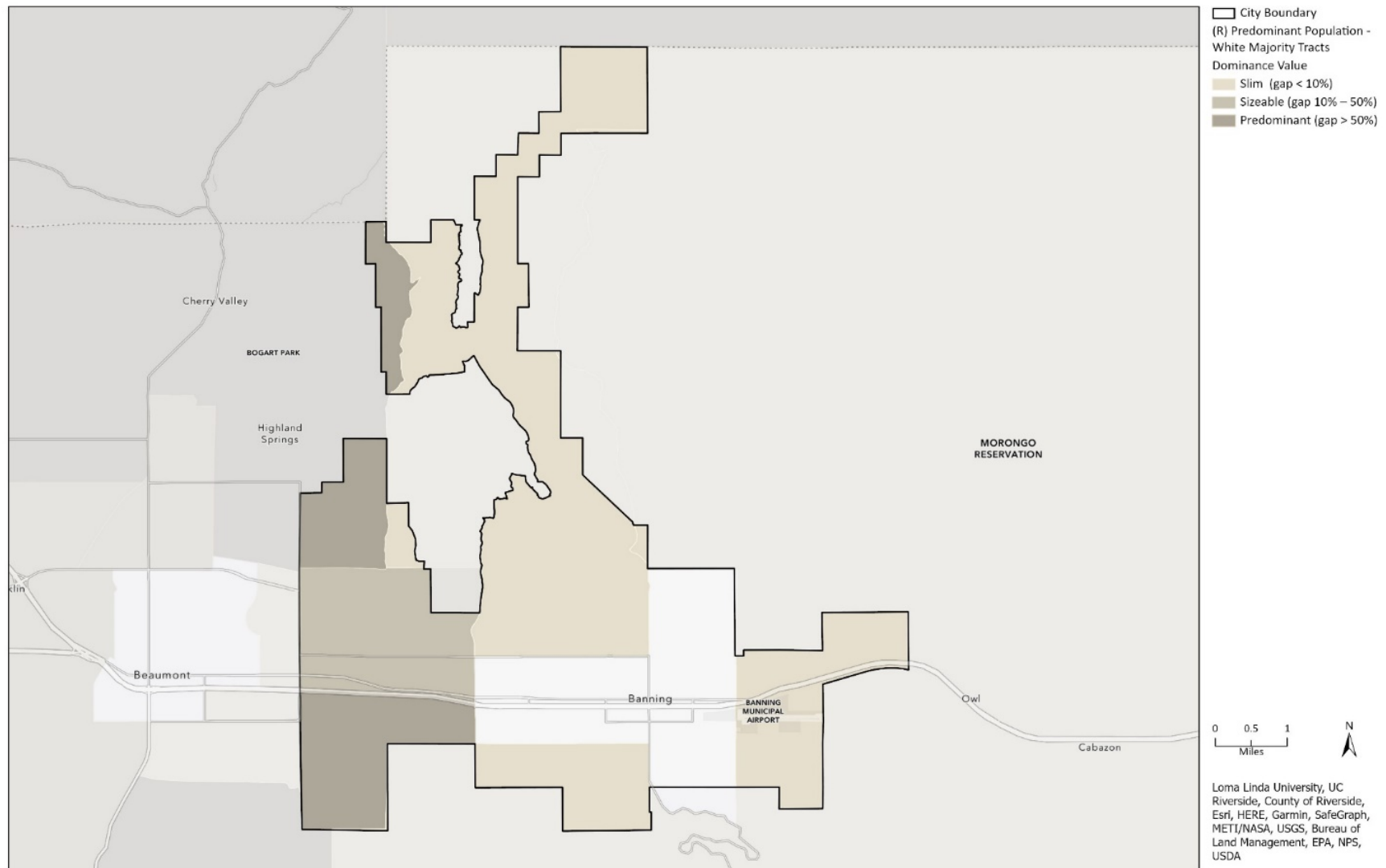
Source: AFFH Data Viewer, 2021

## **City of Banning Minority Concentrated Areas**

Discrimination based on race and ethnicity is a historic and known contributor to unfair housing practices. The existence of concentrations of minorities living in one location may be an indicator that some minority groups in Banning do not have as many housing choices as non-minority residents. This disparity can be an indicator of language barriers, unfair lending practices, and/or lack of mobility access.

As discussed in Chapter 2 of the Housing Element, the City of Banning has a similar percentage of White and Non-Hispanic residents to Riverside County as a whole. White, non-Hispanic residents comprise 36.0 percent of Banning's population, compared to 36.7 percent in County. The city has a slightly lower share of Hispanic residents than the county at 47.0 percent, compared to 47.3 percent. In addition, the city has a lower percentage of Asian residents than the county as a whole (4.5 percent vs. 7.1 percent).

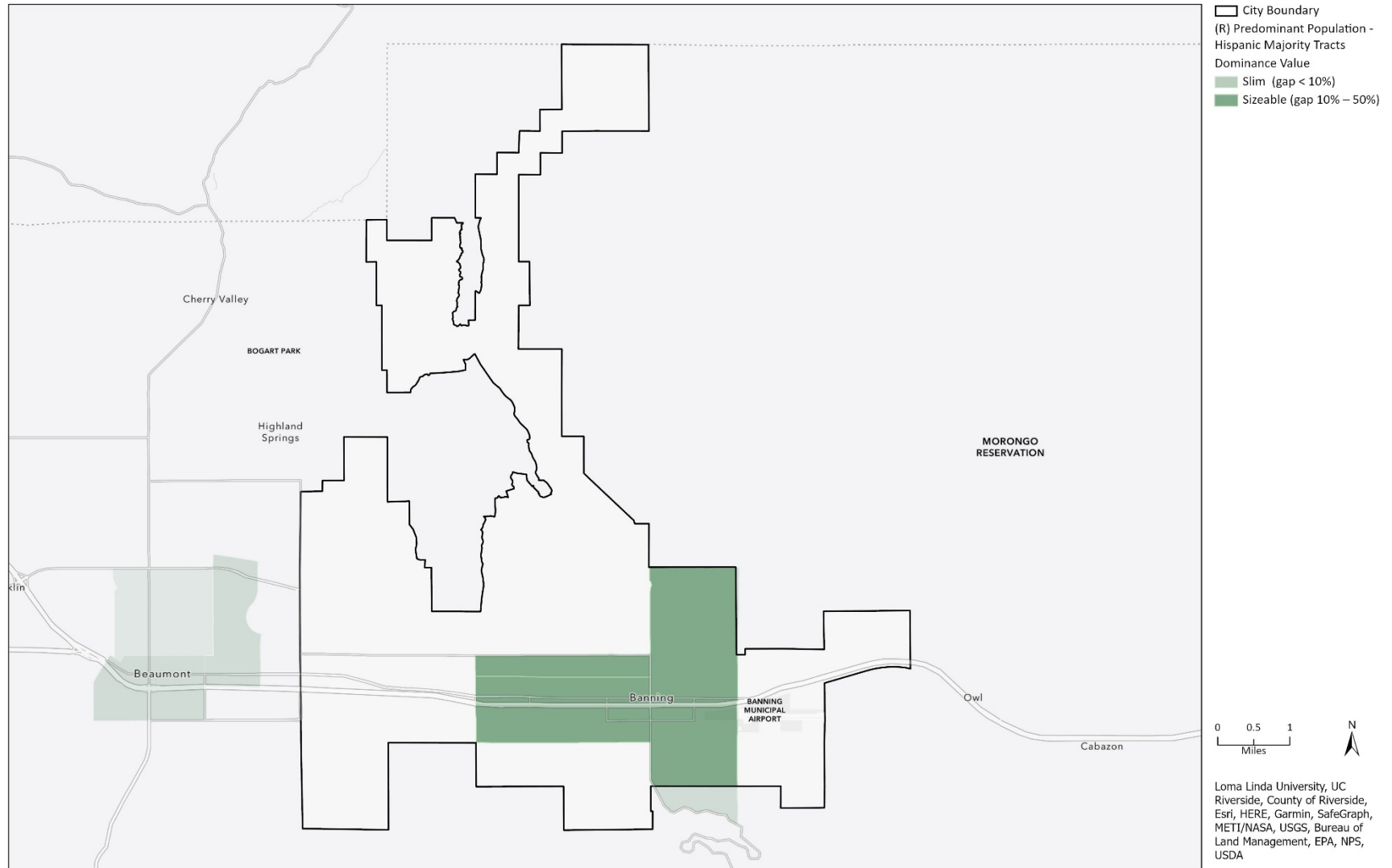
Figure 2 displays areas where white non-Hispanic population comprise the largest demographic throughout the City of Banning, whereas Figure 3 shows areas that are predominately Hispanic areas. According to the AFFH Viewer, areas located near the Banning Municipal Airport and south of the city near Banning High School are areas where approximately 40 percent of residents are White. Additionally, throughout the western regions of the city, in neighborhoods adjacent to Sun Lakes Boulevard and West Wilson Street, White residents are the predominant majority. Areas within the central portion of the city are considered Hispanic majority areas. For instance, approximately 55 percent of population in the neighborhood surrounding Hoffer Elementary School identifies as Hispanic. Furthermore, Figure 4 reflects the percentage of total non-White population within Banning. The highest concentration of non-White populations is in the central segment of the city located along U.S. Interstate 10 (I-10) between South Sunset Avenue and North Hathaway Street.

**Figure 2 Predominant Population – White (City of Banning)**

Source: AFFH Data Viewer, 2021

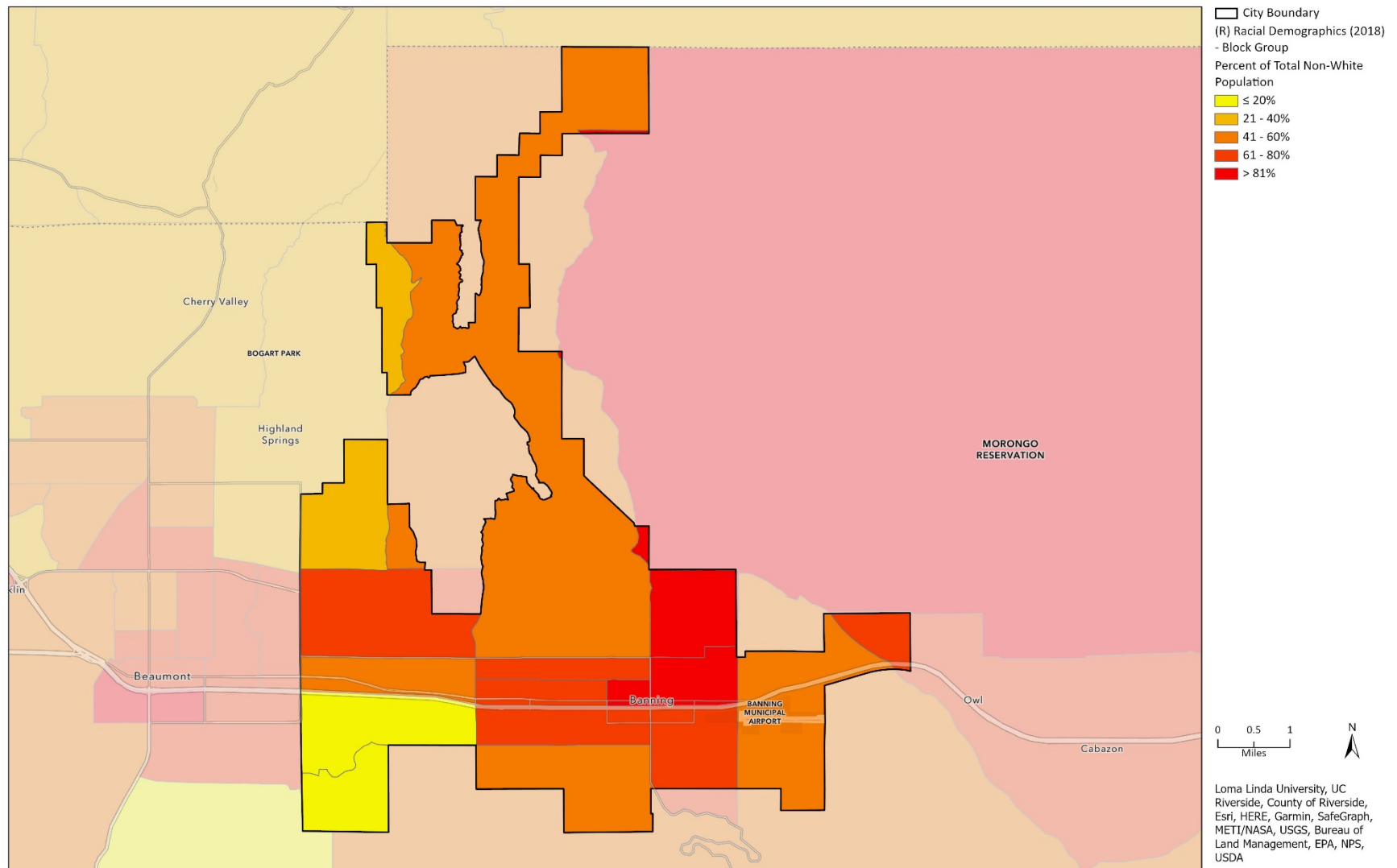


**Figure 3 Predominant Population- Hispanic (City of Banning)**



Source: AFFH Data Viewer, 2021

**Figure 4 Racial Demographics (City of Banning)**



Source: AFFH Data Viewer, 2021

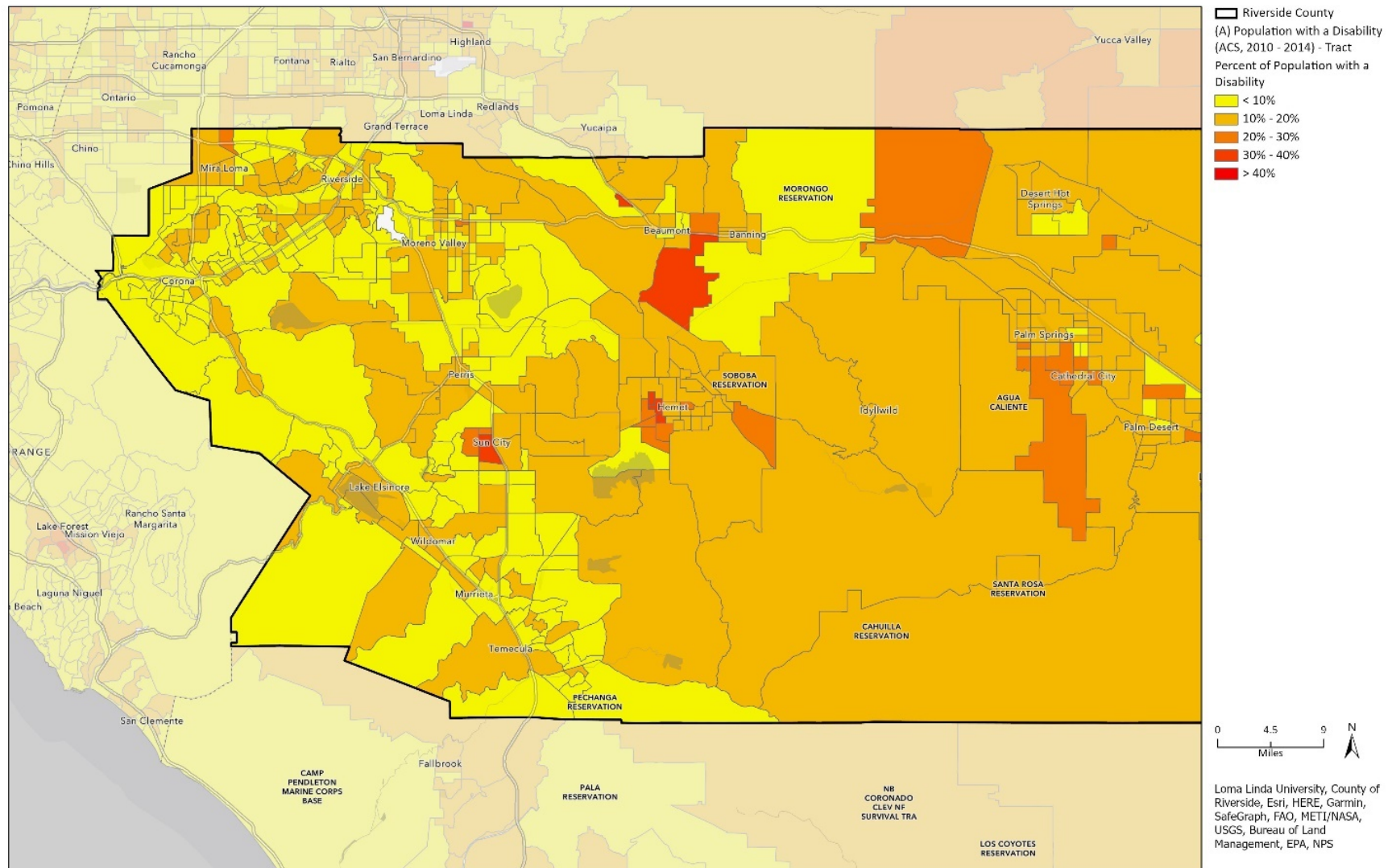
## Persons with Disabilities

### County of Riverside Trends

Housing choices for special needs groups, specifically for persons with disabilities, are limited in the county. According to the County of Riverside AI (using 2013-2017 ACS data), 11.5 percent of county residents reported having a physical disability. Many persons with disabilities face housing-related cost burden compared to non-disabled persons, often due to having relatively fixed incomes. Figure 5 shows areas in Riverside County with concentrations of persons with a disability. Banning is not an area of the county with a high concentration of persons with a disability. The areas with a high concentration of persons with a disability are south of Beaumont, parts of Hemet, and in Sun City.

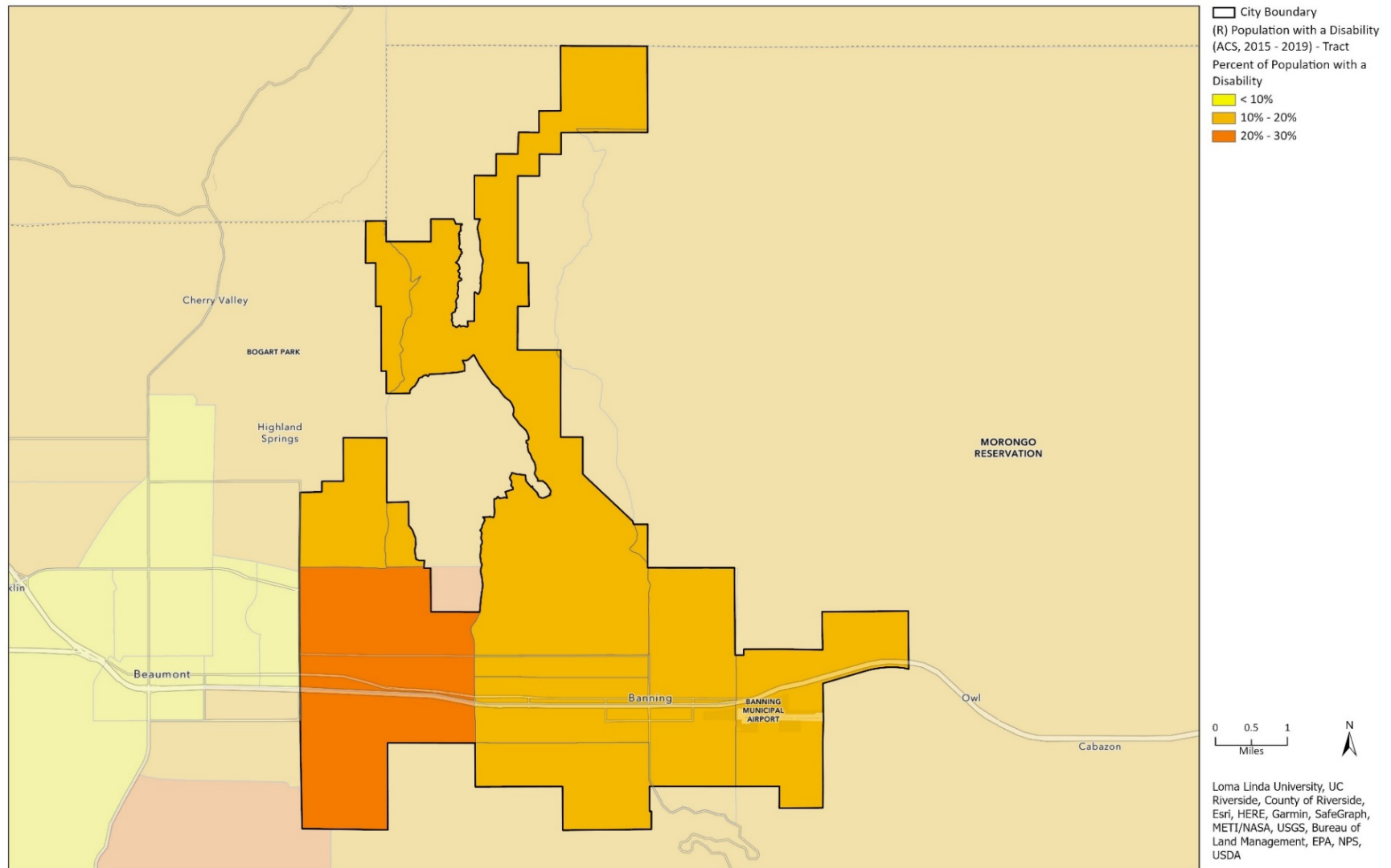
### City of Banning Trends

According to 2014-2018 ACS data, approximately eight percent of Banning residents reported having a disability. The ACS also tallied the number of disabilities by type for residents with one or more disabilities. Among the disabilities tallied, ambulatory difficulties were most prevalent, and cognitive and independent living difficulties were also highly prevalent. Hearing Impairment and ambulatory difficulties were most prevalent in among the senior population. Figure 6 depicts the percentage of population with disabilities throughout the city. The percentage of the city's population with a disability range between 10 and 20 percent, with areas of higher concentrations scattered throughout the city. For instance, approximately 11.4 to 14.8 percent of the population north of I-10 is living with at least one disability compared to 16.0 percent of the population residing in southwestern Banning.

**Figure 5 Population with a Disability (County of Riverside)**

Source: AFFH Data Viewer, 2021

**Figure 6 Population with a Disability (City of Banning)**



Source: AFFH Data Viewer, 2021

## Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. The Fair Housing Act makes it unlawful to discriminate against a person whose household includes one or more children who are under 18 years of age. Familial status protection covers households in which one or more minor children live with: a parent, a person who has legal custody (including guardianship) of a minor child or children, or the designee of a parent or legal custodian, with the written permission of the parent or legal custodian.<sup>1</sup>

The United States Department of Housing and Urban Development (HUD) data shows that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to disability and race. While the language in federal law about familial status discrimination is clear, the guidelines landlords can use to establish occupancy can be very vague. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit, landlords often impose occupancy limitations that can preclude large families with children. Differential treatments such as limiting the number of children in a complex, or confining children to a specific location, are also fair housing concerns. Single-parent, female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.

### County of Riverside Trends

Certain jurisdictions in the county have a higher-than-average proportion of family households with children and may be more vulnerable to discrimination based on familial status. Additionally, families, particularly single, female-headed families, are disproportionately affected by poverty. Figure 7 through Figure 10 show the familial patterns and trends throughout the county. According to the data shown in Figure 7, the cities of Banning, Hemet, Palm Springs are shown to have relatively lower percentages of children living in married-couple household compared to other areas. Areas within and surrounding the cities of Temecula, Banning, and Hemet have the relatively higher concentrations of single, female-headed households and lower percentages of adults living with a spouse/partner. Moreover, as shown in Figure 10, cities such as Sun City, Palm Springs, and Cathedral City have a higher percentage of adults living alone compared to the rest of Riverside County.

### City of Banning Trends

Between 2010 and 2018, variation between household types in Banning has generally increased. According to 2018 ACS estimates, almost one-third of households in the city are single-person households, and families with children comprise less than one quarter of total households. Senior-headed households comprise approximately as many households as families with children. Single-parent households comprise of 11.3 percent of total households. Additionally, when comparing 2010 and 2018 data, the share of single-parent and senior-headed households as a percent of the total number of households increased by 3.4 percent and 3.8 percent, respectively, while the share of single-person households decreased slightly. Figure 11 shows areas of the city with concentrations of single-parent, female-headed households. Areas of higher concentrations (between 40 and 60 percent of families with

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<sup>1</sup> Fair Housing: Equal Opportunity for All: [https://www.hud.gov/sites/documents/FHEO\\_BOOKLET\\_ENG.PDF](https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF)

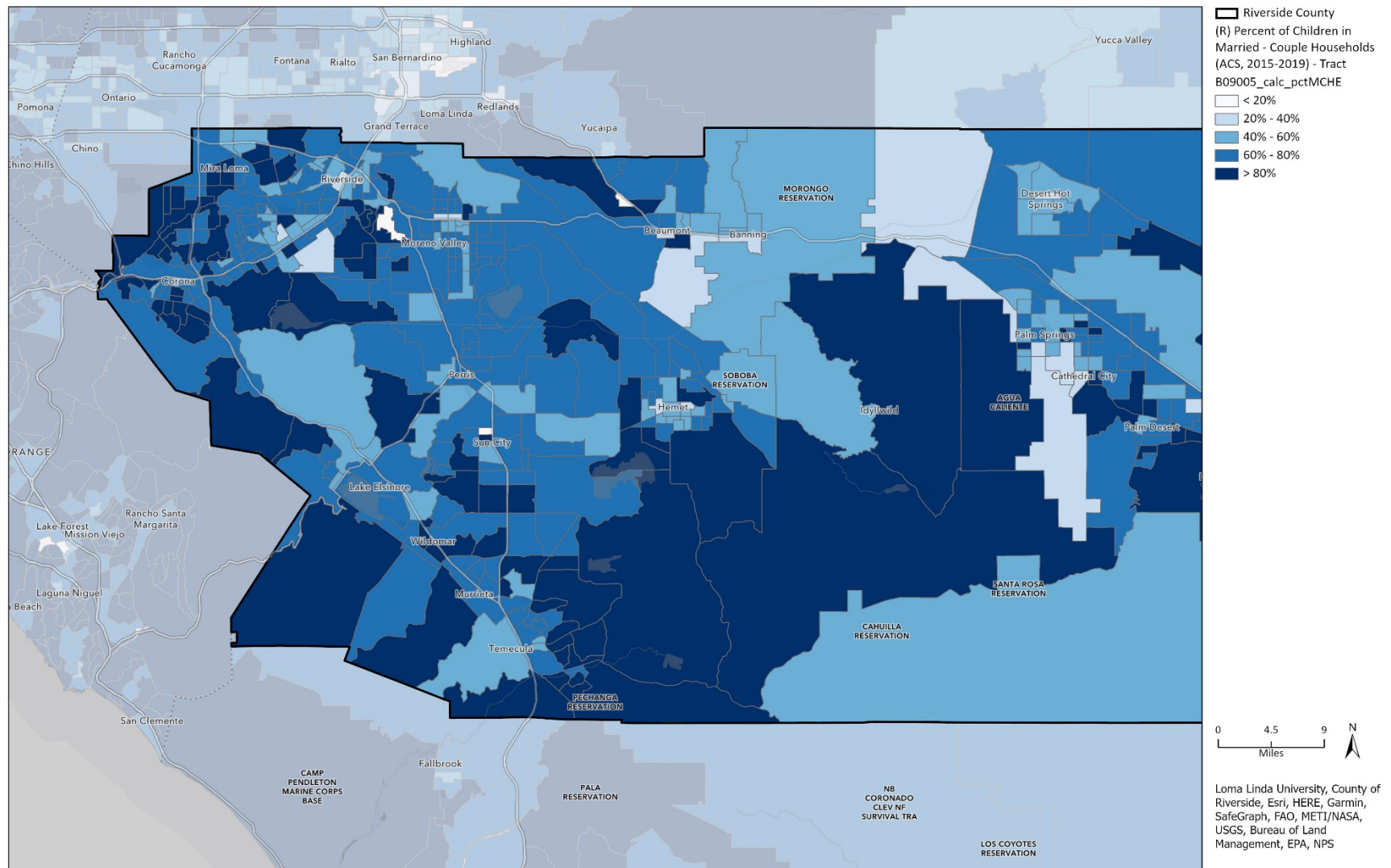
children) are scattered throughout neighborhoods located south of I-10, around Westward and San Geronio avenues. Table 4 shows a comparison of household types in the city and the change from 2010 to 2018.

**Table 4 Household Characteristics, City of Banning (2010-2018)**

| Household Type           | 2010   |                       | 2018   |                       | Percent Change in Share of Households 2010-2018 |
|--------------------------|--------|-----------------------|--------|-----------------------|---|
|                          | Number | Percent of Households | Number | Percent of Households |   |
| Single-Person Households | 3,724  | 31.3                  | 3,386  | 31.1                  | -0.2  |
| Senior-Headed Households | 2,195  | 18.4                  | 2,421  | 22.2                  | 3.8   |
| Families with Children   | 2,625  | 22.1                  | 2,547  | 23.4                  | 1.3   |
| Single-Parent Households | 940    | 7.9                   | 1,233  | 11.3                  | 3.4   |
| Total Households         | 11,871 | 100                   | 10,885 | 100                   | -   |
| Average Household Size   | 2.4    | -                     | 2.7    | -                     | -   |
| Average Family Size      | 3.0    | -                     | 3.5    | -                     | -   |

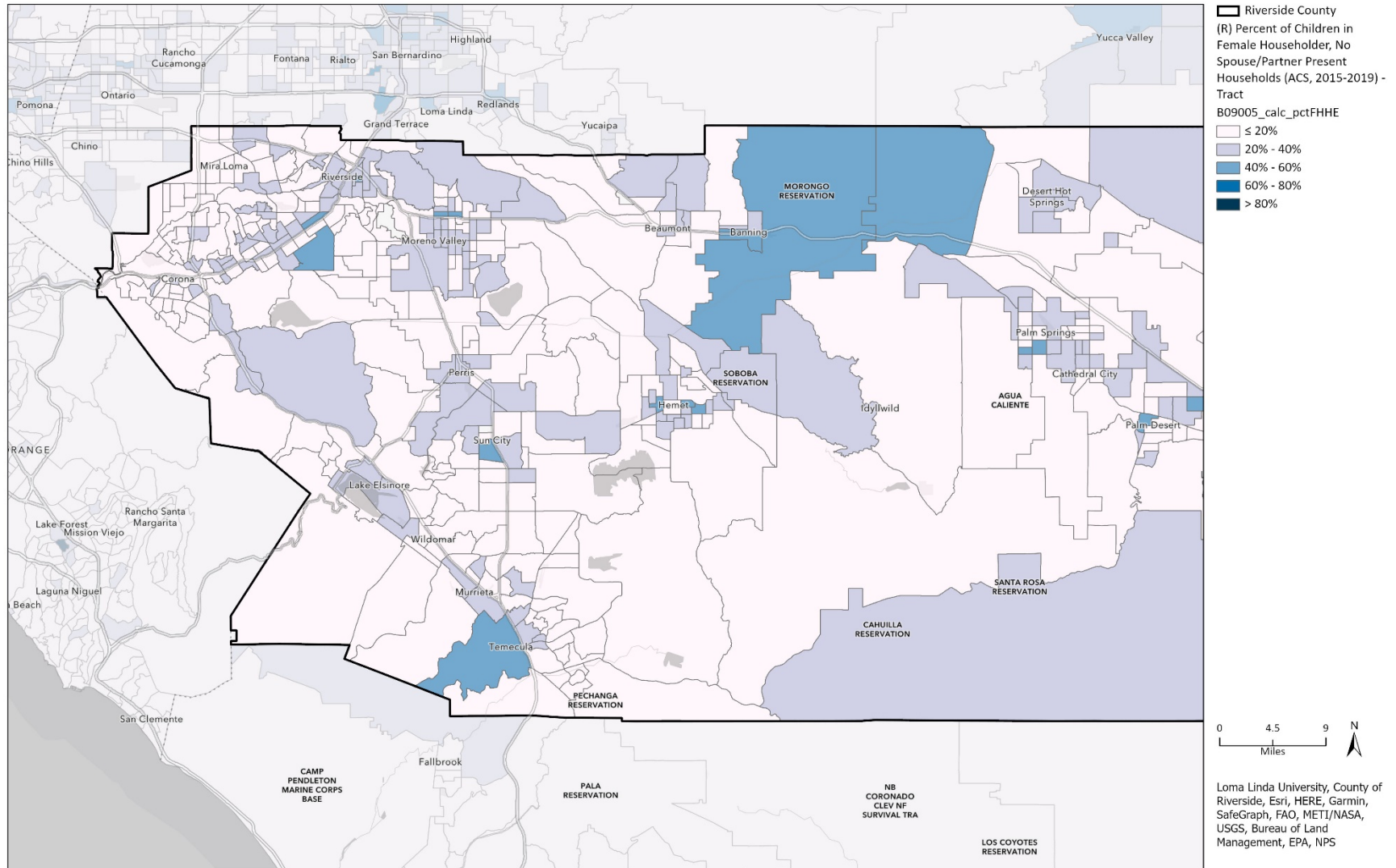
Source: American Community Survey, 2006–2010, 2014–2018.



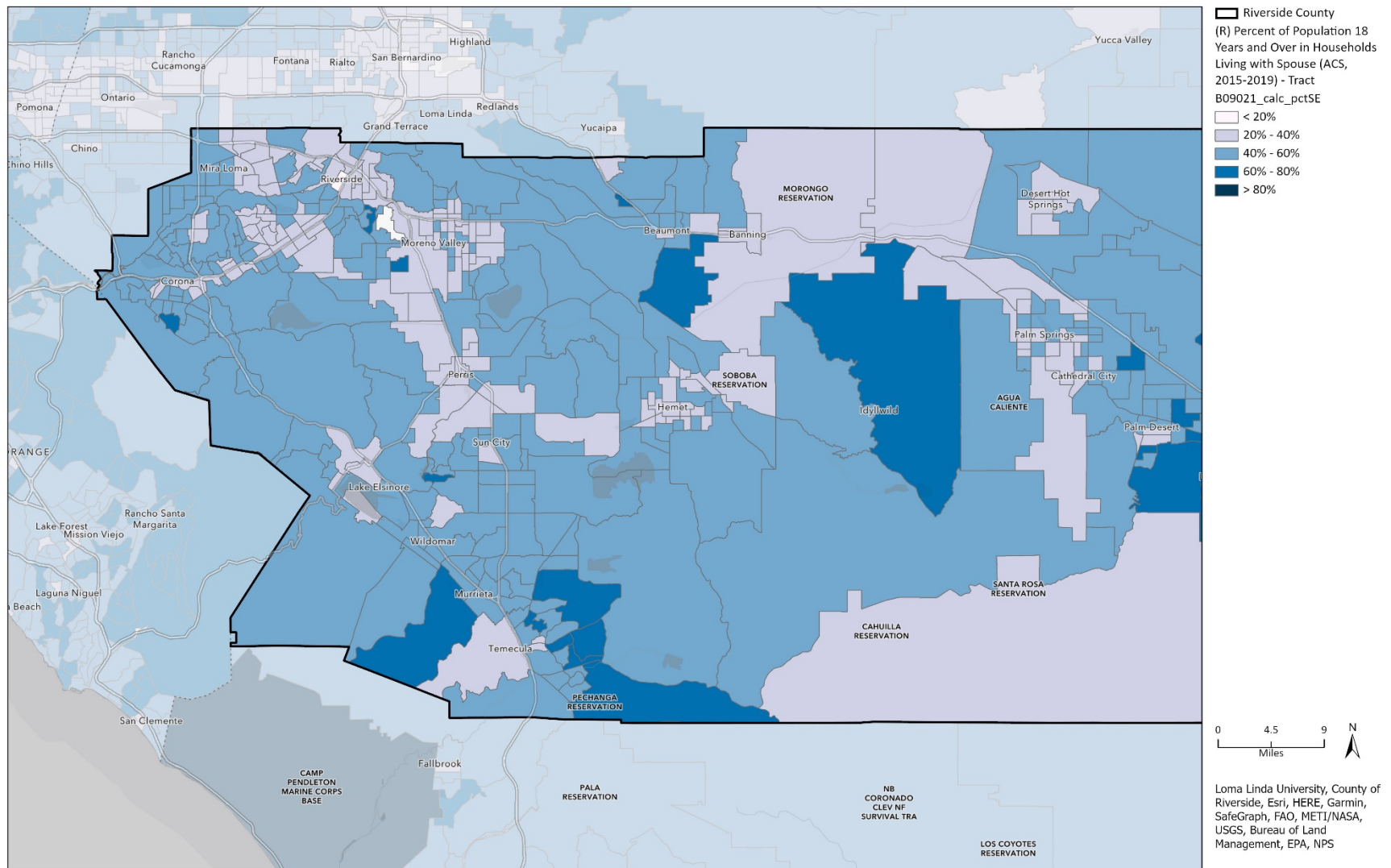
**Figure 7 Children in Married-Couple Households (County of Riverside)**

Source: AFFH Data Viewer, 2021

**Figure 8 Female Headed Households with Children, No Spouse/Partner Present (County of Riverside)**



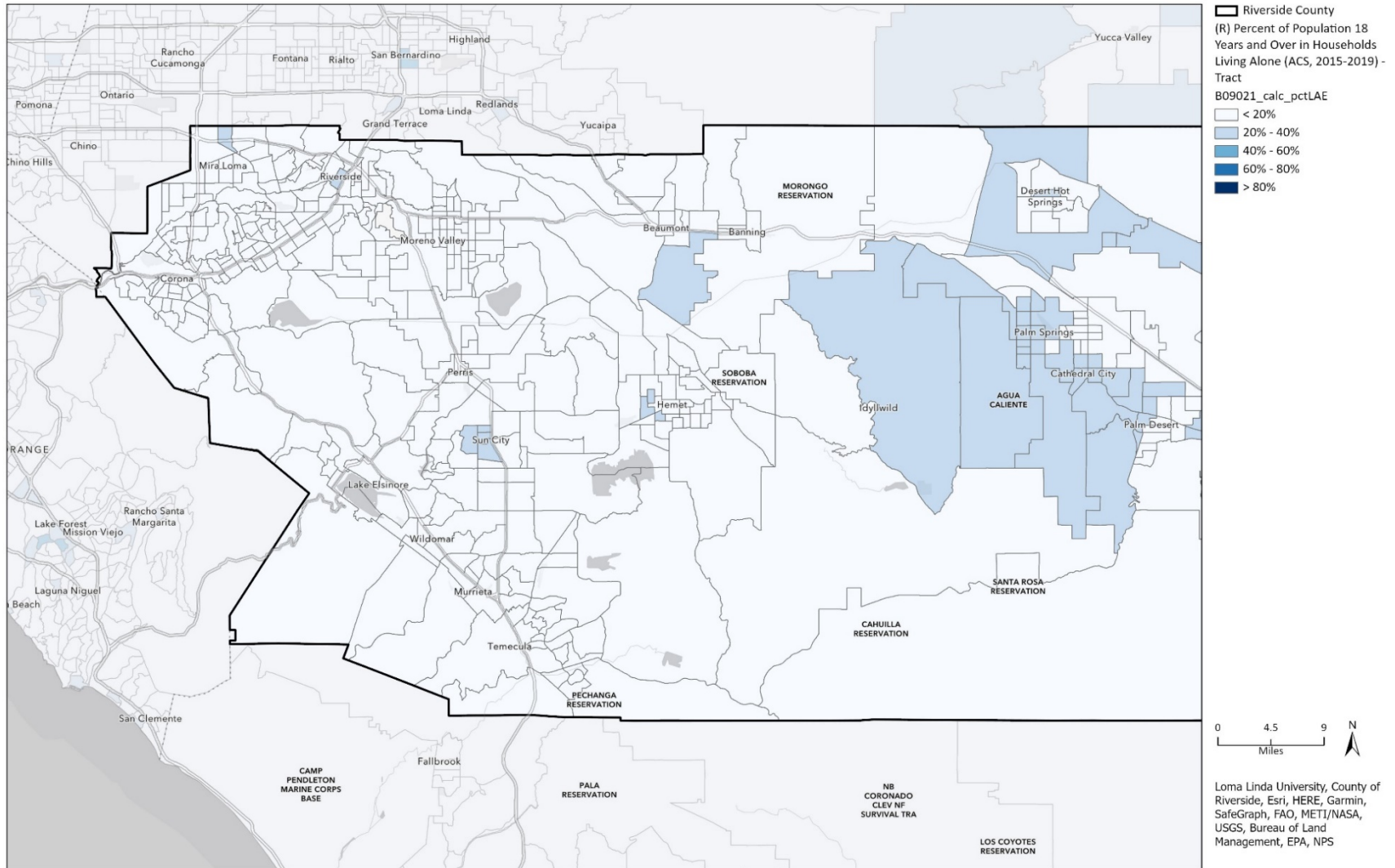
Source: AFFH Data Viewer, 2021

**Figure 9 Population of Adults Living with Spouse/Partner (County of Riverside)**

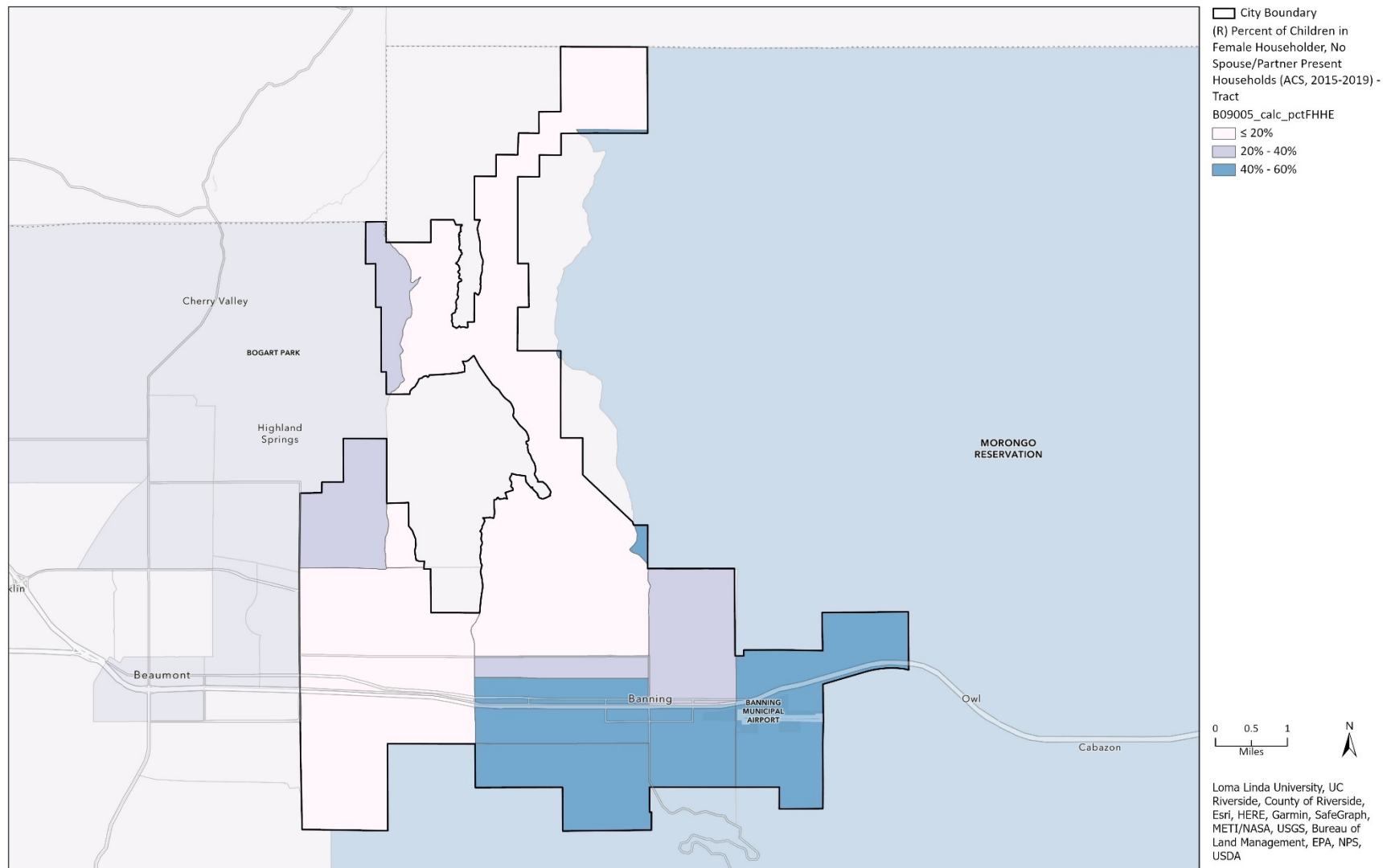
Source: AFFH Data Viewer, 2021



**Figure 10 Population of Adults Living Alone (County of Riverside)**



Source: AFFH Data Viewer, 2021

**Figure 11 Single-Parent, Female-Headed Households with Children (City of Banning)**

Source: AFFH Data Viewer, 2021

## INCOME

Identifying low-moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51.0 percent of the population is LMI (based on HUD income definition of up to 80 percent of the area median income (AMI). Household income is directly connected to the ability to afford housing. Higher income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of income for housing and the likelihood of residing in overcrowded or substandard housing increases. Households with incomes below the poverty level, which are typically households classified as extremely low and very low incomes, may require special programs to assist them in meeting their rent and mortgage obligations.

### County of Riverside Trends

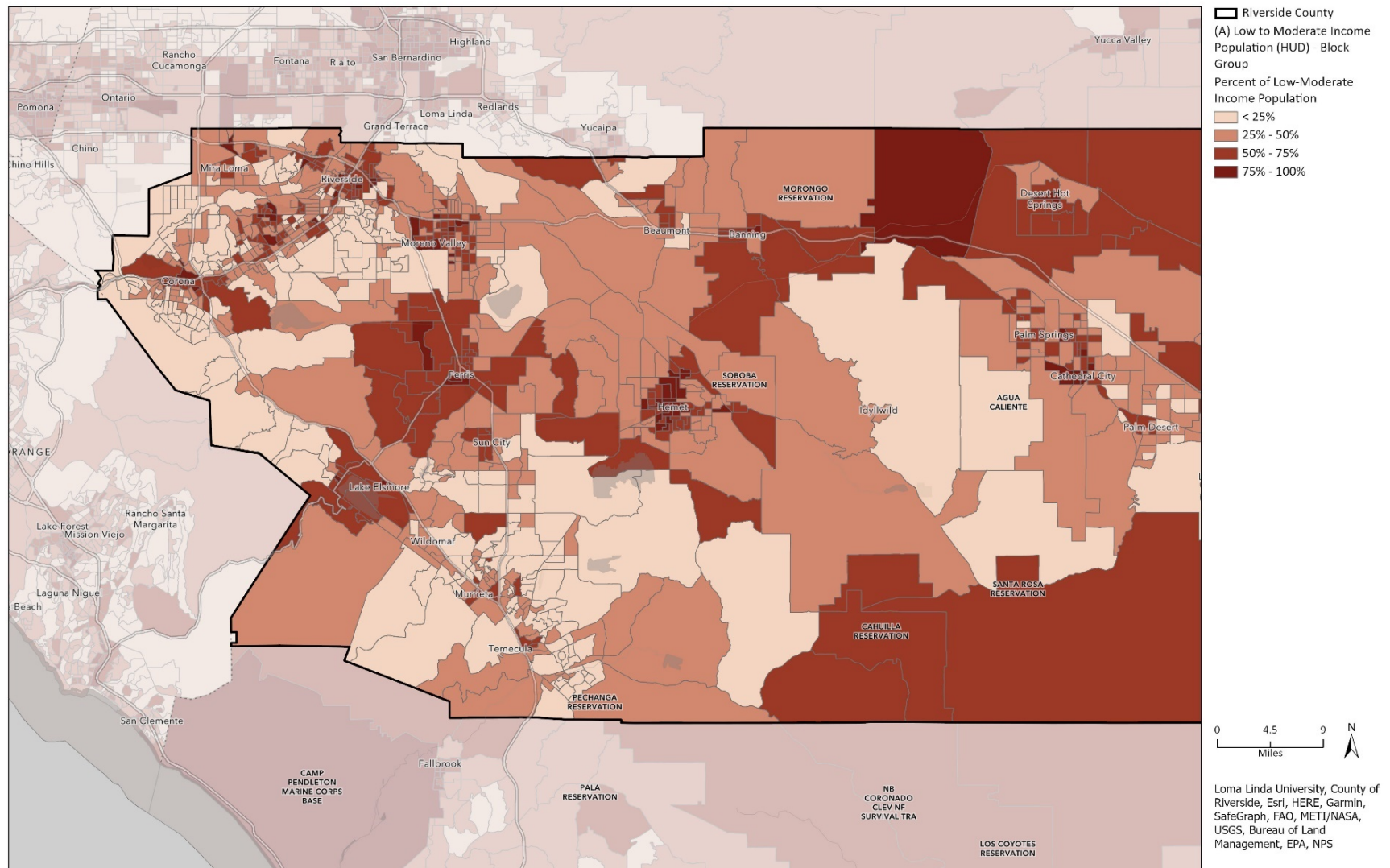
Table 5 compares household incomes in Banning, surrounding cities, and Riverside County. The 2014-2018 ACS estimates the median household income in Banning at \$41,038 compared to \$63,948 in the county. Comparatively, the City of Beaumont had a higher median household income than the county, and Moreno Valley had a similar median household income as the county. Approximately 27 percent of Banning households earned less than \$25,000 (2014-2018 ACS data). In contrast, about 12.4 percent of Banning households earned \$100,000 or more.

**Table 5 Comparative Median Household Income in Dollars**

| Jurisdiction        | 2018   | Comparison to County Average |
|---------------------|--------|------------------------------|
| Banning             | 41,038 | -22,910                      |
| Beaumont            | 78,111 | +14,163                      |
| Moreno Valley       | 63,572 | -376                         |
| Hemet               | 39,179 | -24,769                      |
| City of Riverside   | 65,313 | +1,365                       |
| County of Riverside | 63,948 | -                            |

Source: Bureau of the Census, American Community Survey American Community Survey, 2014-2018.

Figure 12 shows the LMI areas in the county by census block group. LMI areas are in the urban centers such as the cities of Riverside and Perris and in the eastern rural areas of the county near Desert Hot Springs and the Cahuilla and Santa Rosa Reservations.

**Figure 12 LMI Areas (County of Riverside)**

Source: AFFH Data Viewer, 2021



## City of Banning Trends

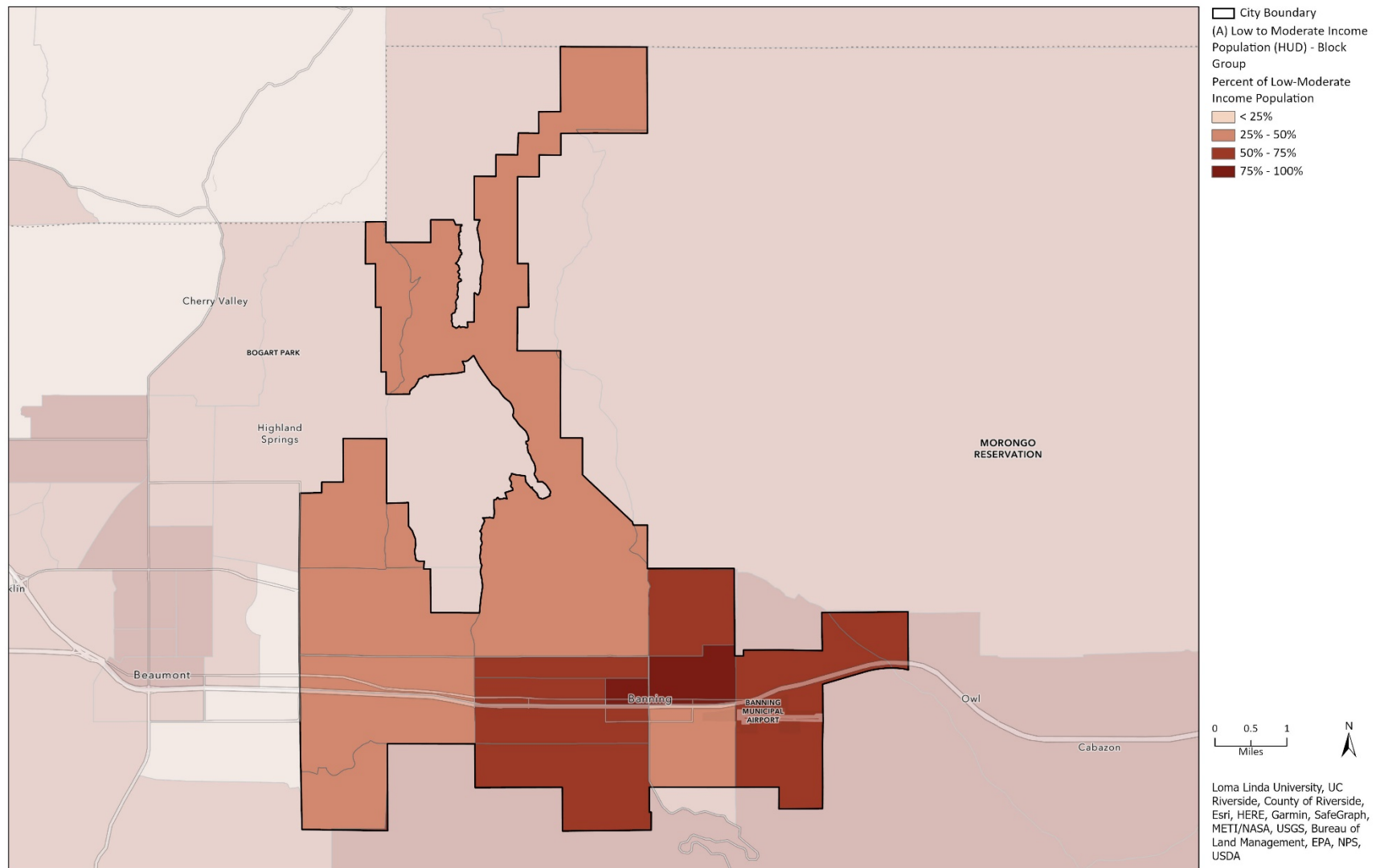
The 2014-2018 ACS identified 32 percent of all Banning residents as living in households with incomes below the poverty level, including 36.4 percent of people under 18 years of age and 12.3 percent of people 65 years of age and over. As shown below in Table 6, 45.0 percent of Banning households earned moderate or above moderate-incomes, while 55.0 percent of households were classified as lower-income.

**Table 6 City of Banning Households by Income Category**

| Income Category (Percent of County AMI) | Households | Percent |
|---|------------|---------|
| Extremely Low (30% or less)             | 1,765      | 16.2    |
| Very-Low Income (<50% of AMI)           | 1,815      | 16.7    |
| Low Income (50-80% of AMI)              | 2,375      | 21.9    |
| Moderate Income (80% - 100%)            | 1,045      | 9.6     |
| Moderate and Above Income (over 100%)   | 3,855      | 35.5    |
| Total                                   | 10,860     | 100.0   |

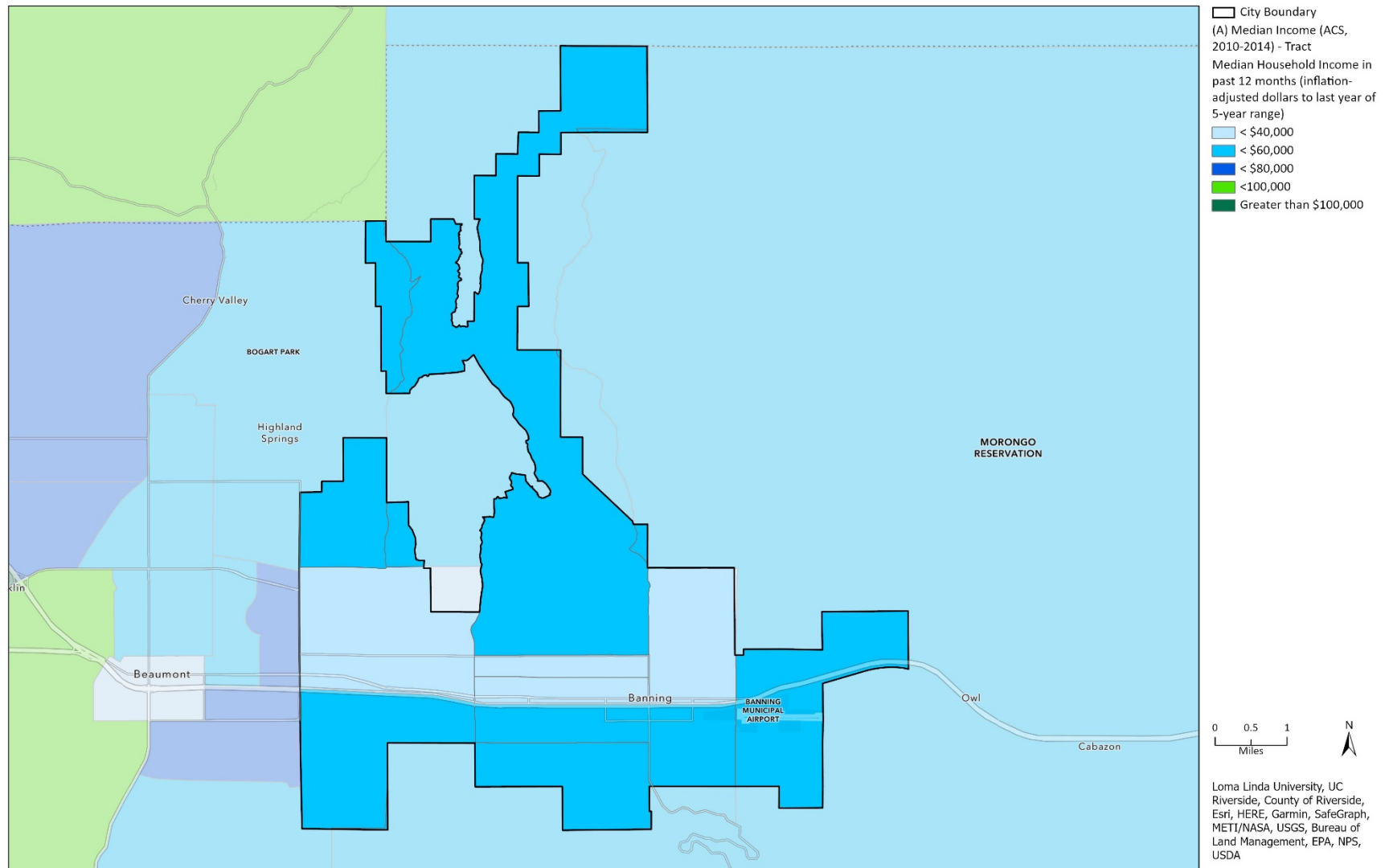
Source: HUD; Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Figure 13 shows the LMI areas in Banning by census block group. LMI areas are concentrated east-west in the central part of the city, including the downtown area and north and south of I-10, surrounding the Banning Municipal Airport, and east of Magnolia Avenue. Figure 14 shows the median income by block group in the city. Correspondingly, areas of lower household income are most prominent along the intersection of South Hargrave Street and East Williams Street. According to 2017 CHAS estimates, percent of residents are categorized as low-moderate income in this area.

**Figure 13 LMI Areas (City of Banning)**

Source: AFFH Data Viewer, 2021

**Figure 14 Median Household Income (City of Banning)**



Source: AFFH Data Viewer, 2021

## RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

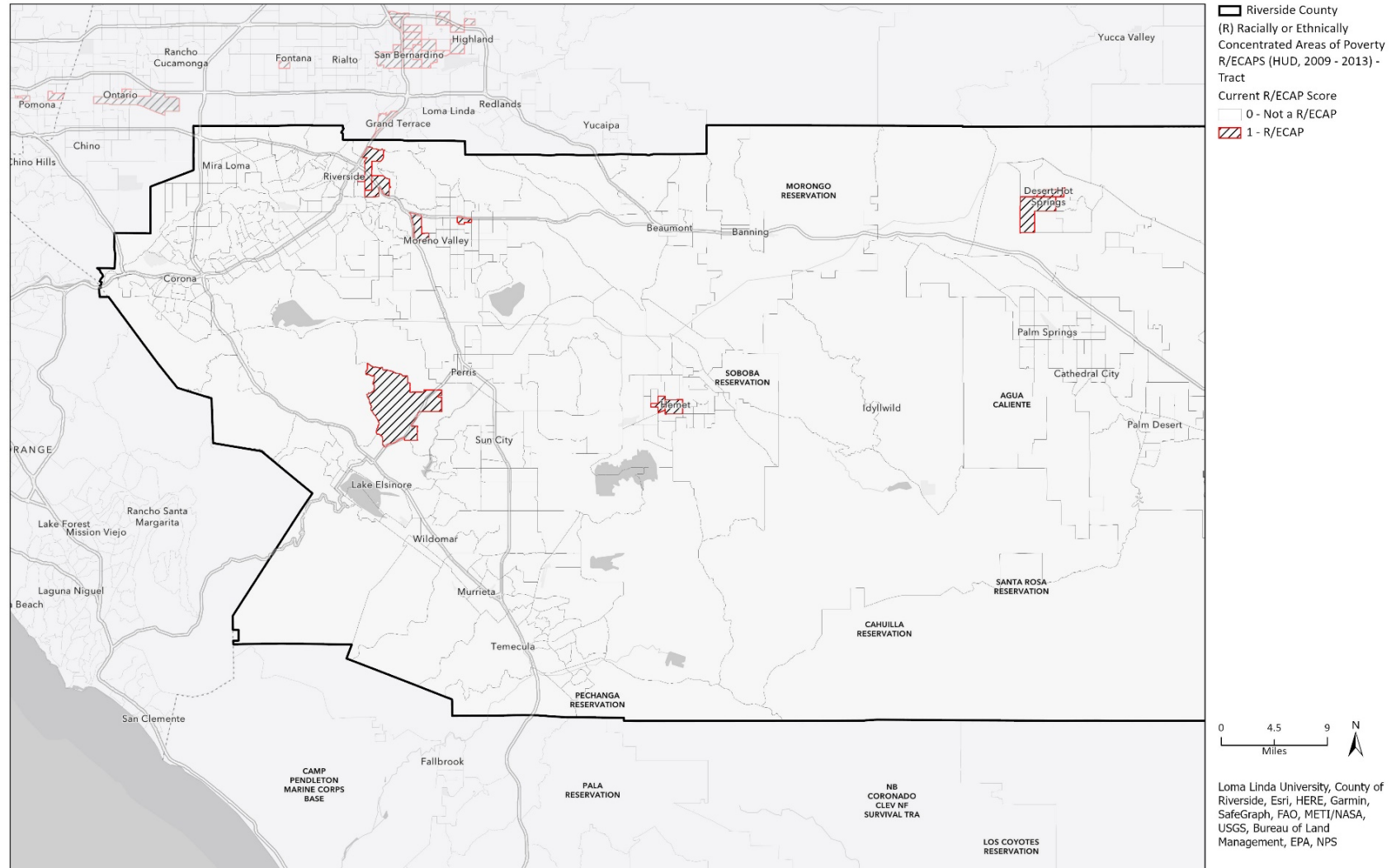
To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as R/ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. For an area to be identified as having a racial and ethnic concentration, the threshold is that a R/ECAP have a non-White population of 50.0 percent or more, within metropolitan or micropolitan areas. In locations outside these areas, where the non-White populations are likely to be much smaller than 50.0 percent, the threshold is set at 20.0 percent. The poverty test defines areas of “extreme poverty” as those where 40.0 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets either the racial or ethnic concentration and meets the poverty test would be considered a RE/CAP.

Despite the repeal of explicitly racist and discriminatory housing laws, there remains a lasting legacy of segregation and resources disparities. Housing choice is often limited for persons of protected classes, including communities of color, to segregated concentrated areas of poverty. Programs 19 through 28 in the Housing Element focus on the City’s efforts to affirmatively reduce barriers to housing, including but not limited to, racial inequities, high housing costs, and public awareness of existing resources. Poverty and segregation work to exasperate existing impediments in Banning, such as concentrations of LMI populations, language barriers, lending discrimination, and overcrowded conditions.

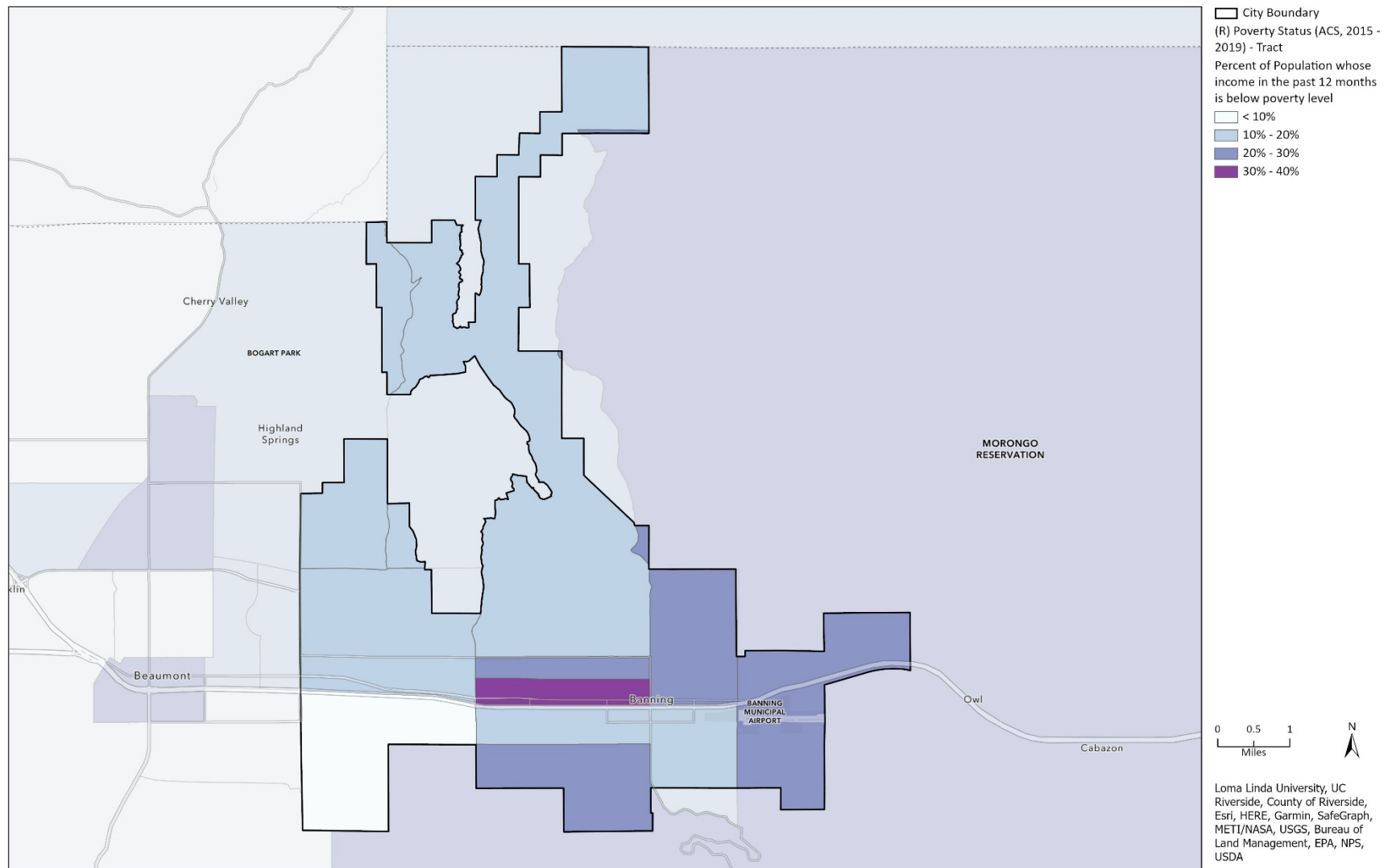
### City of Banning Trends

As shown by Figure 15, Banning does not have any R/ECAP areas as defined by HUD. However, there are concentrated areas in the city with higher degrees of poverty and racial/ethnic segregation. Figure 16 shows concentrated areas of poverty in the city by census tract, with higher poverty occurring in Census Tract 441.01 along I-10. Approximately 30 to 40 percent of the population in this census tract experience poverty. Additionally, 20 to 30 percent of the population in census tracts in the southern and eastern portion of the city experience poverty. Poverty is generally lower in the rest of the city, specifically in southwest portion. Areas of racial/ethnic segregation exist mainly in the southeastern area of the city (Census Tracts 442 and 443) east of San Geronio Avenue, as shown in Figure 17. These census tracts experience a poverty rate of 20 to 30 percent and generally overlap with areas of high racial/ethnic segregation.

Figure 15 R/ECAPs (County of Riverside)

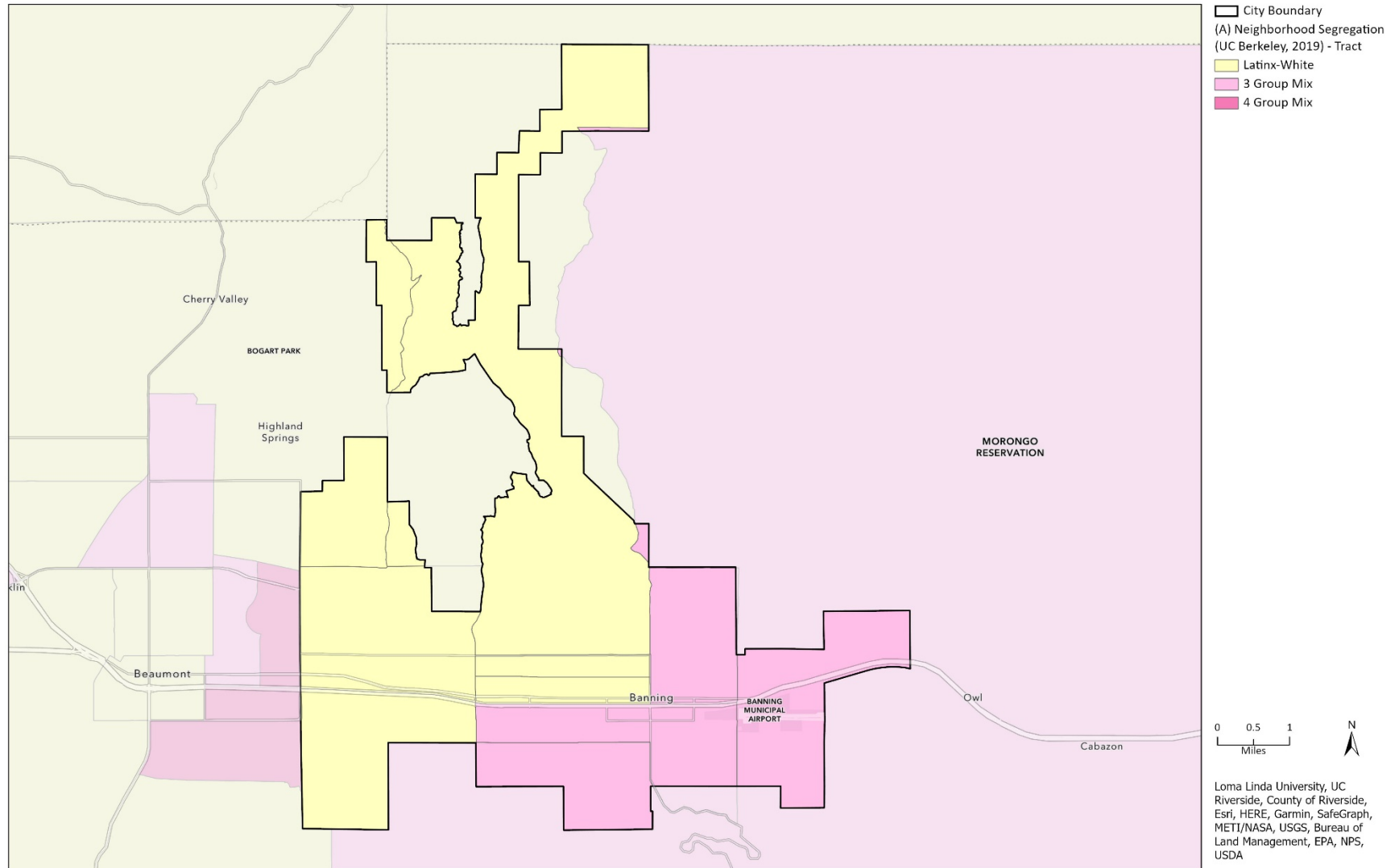


Source: AFFH Data Viewer, 2021

**Figure 16 Areas of Poverty (City of Banning)**

Source: AFFH Data Viewer, 2021

Figure 17 Areas of Segregation (City of Banning)



Source: AFFH Data Viewer, 2021



## CONCENTRATED AREAS OF AFFLUENCE

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated. According to a policy paper published by HUD, RCAA is defined as affluent, white communities.<sup>2</sup> According to HUD's policy paper, "White people are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of non-White people, conversely, distinct advantages are associated with residence in affluent, white communities." Although RCAAs have not been studied extensively, and a standard definition has not been published by HCD or HUD, this fair housing assessment uses the percent white population and median household income as proxies to identify potential areas of affluence.

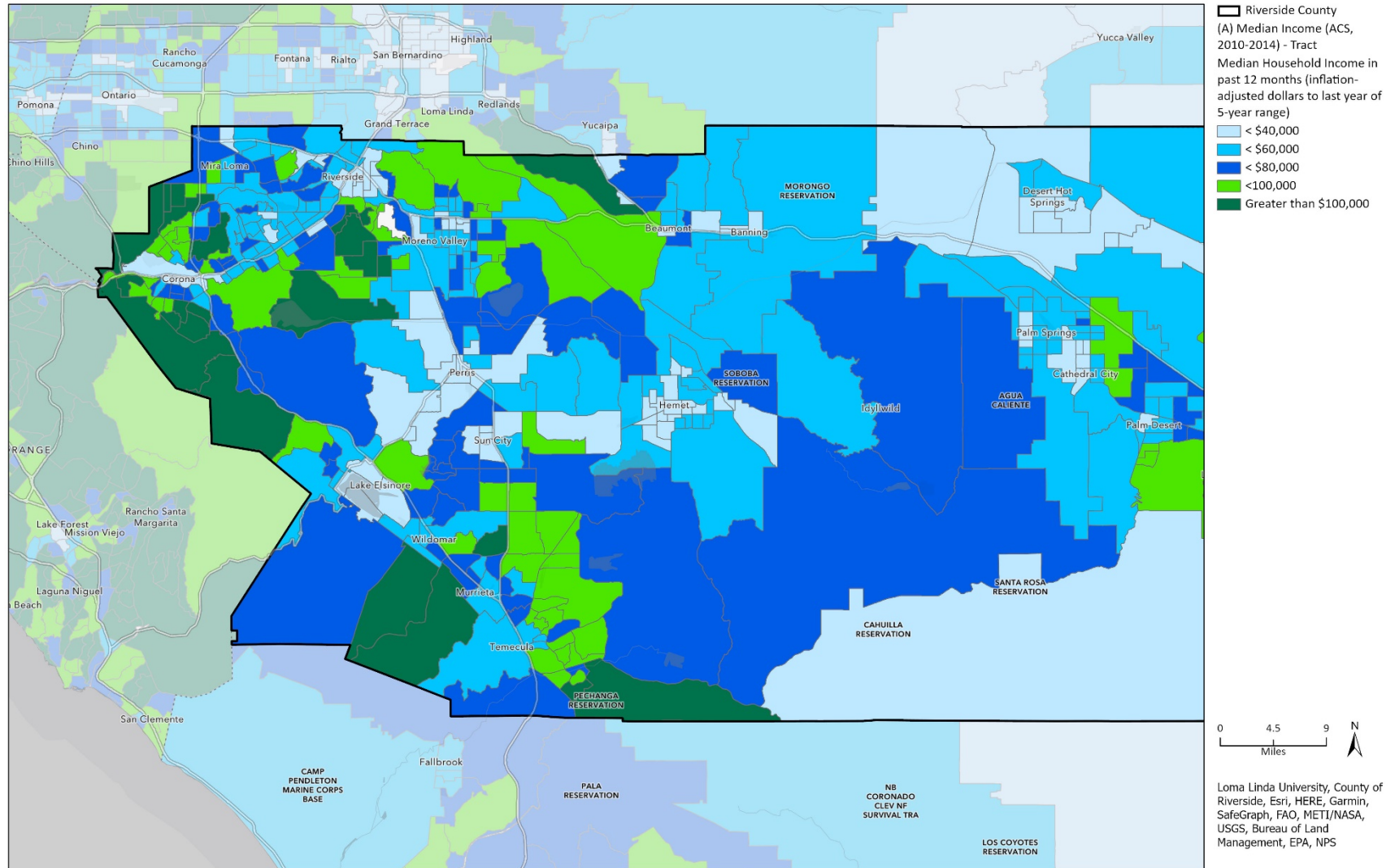
### County of Riverside Trends

As stated above in the discussion on Income, the median household income in the county was \$63,948, compared to \$42,274 in Banning. As shown on Figure 18, median incomes are generally highest in the western portion of the county, where community populations are larger and denser. Though there isn't an exact correlation, higher-income areas generally align with areas of the county with low proportions of non-White residents (Figure 19). These areas of high median income and higher proportions of White populations constitute as areas of high affluence. This pattern occurs in areas east of Corona, east of Palm Springs, and south of Palm Desert.

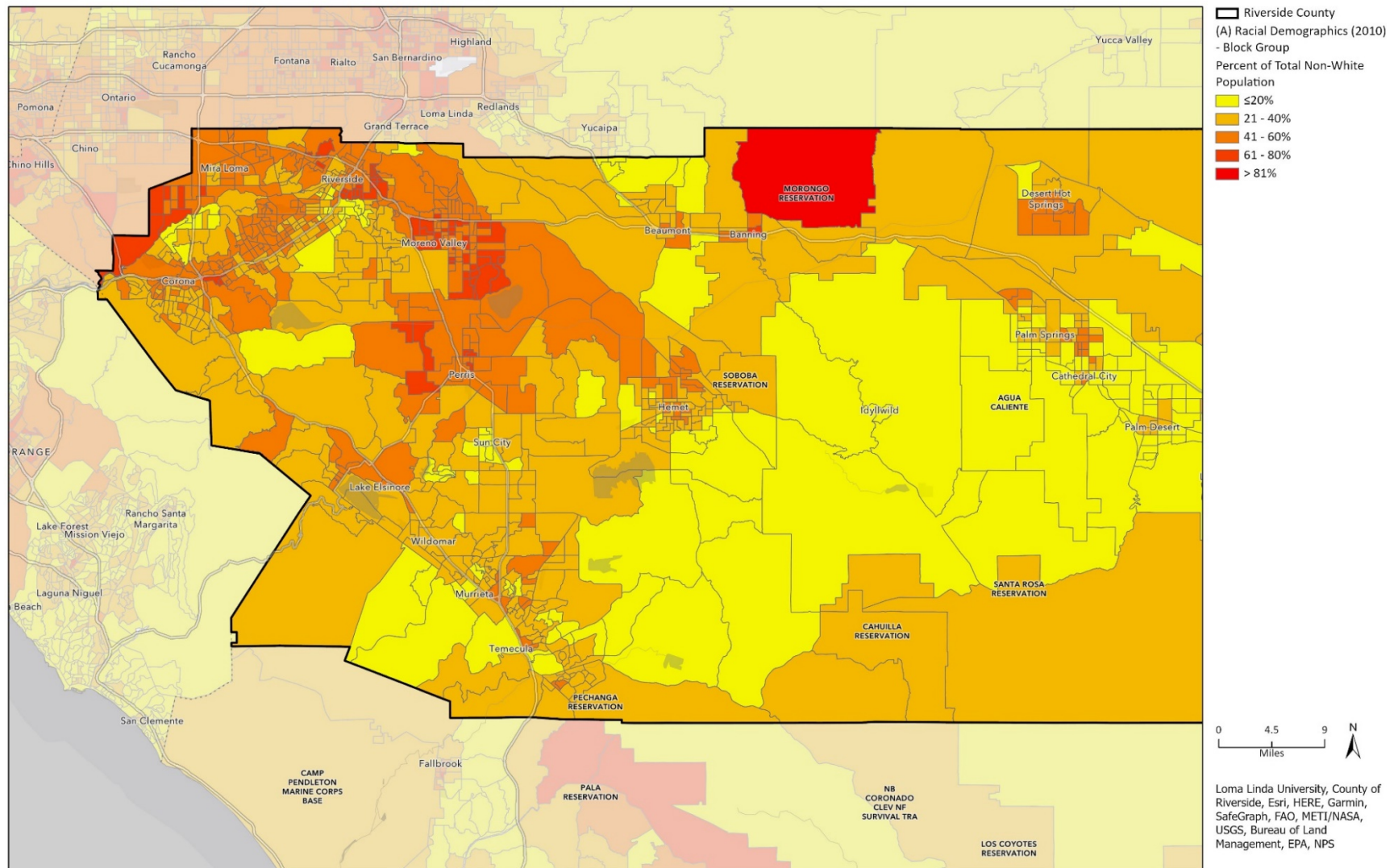
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<sup>2</sup> Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.' Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in *Cityscape: A Journal of Policy Development and Research* (21,1, 99-123).

**Figure 18 Median Household Income (County of Riverside)**



Source: AFFH Viewer 2021

**Figure 19 Racial Demographics (County of Riverside)**

Source: AFFH Viewer 2021

## **City of Banning Trends**

As shown on Figure 2, Banning has a predominance of White population in the western portion of the city. As shown on Figure 14, except for portions of the center of the city north of I-10 (Census Tracts 441.01, 441.03 and 442), median household income is between \$40,000 and \$60,000. Concentration of high median income and higher proportion of White residents occur in the southwest portion of the city south of I-10.

## **Disparities in Access to Opportunity**

Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity often means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to “high resource” neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

### **Transit**

Access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should strive to link lower income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage and increase housing mobility, which enables residents to locate housing outside of traditionally low-income neighborhoods. The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice. Persons who depend on public transit may have limited choices regarding places to live.

## **County of Riverside Trends**

Riverside County residents in urban and suburban areas generally access to transportation infrastructure, which includes the Riverside Transit Authority (RTA) bus system, the Sun Line Transit Agency in the Palm Springs area, Palo Verde Transit Agency in the Blythe area, and the Riverside Metrolink Station. Public transit providers serve large portions of the western side of the county.

Transit use is higher in parts of the region where the greatest investment in transit service has been made. Almost all major employment centers in Riverside are served by some form of public transit. However, having regional access to jobs by means of public transit does not necessarily translate into stable employment. Low-income workers, especially female heads of household with children, have unique travel patterns that may prevent them from obtaining work far from home, regardless of access to public transit. Women in general are disproportionately responsible for household-supporting activities such as trips to grocery stores or accompanying young children to and from schools.

AllTransit is an online database that provides details on transit opportunity throughout the United States. The website explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The participating jurisdictions in the

County received an average AllTransit performance score of 3.3.<sup>3</sup> AllTransit performance score explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. A score of 3.3 indicates that there is a low combination of trips per week and number of jobs accessible enabling few people to take transit to work.

### City of Banning Trends

Banning is serviced by the Banning Connect transit system. According to AllTransit, approximately two percent of employed residents in Banning take public transportation to work. The city has an AllTransit Performance Score of 2.6, lower than the county as a whole. This score is considered low, with a low combination of trips per week and number of jobs accessible by public transit. Five transit routes are available on average within 0.5-mile of a block group. Approximately two percent of employed residents that live within 0.5 mile from work walk to their job, while less than one percent bike to their job.

### Education

#### County of Riverside Trends

The TCAC Opportunity Areas map for education provides an overview of education outcomes across the county. As shown in Figure 20, areas with more positive educational outcomes are located in the western portion of the county and near Beaumont and Palm Desert. The TCAC Opportunity methodology included test scores, high school graduation rates, and school poverty rates.

Kidsdata.org, a program of the Lucile Packard Foundation for Children's Health, estimated that approximately 28 percent of children aged 0-17 in Riverside County were living in low-income working families between 2013 to 2017. Additionally, 21.3 percent of families with children aged 0-17 in the county were below the poverty level between 2013-2017 and approximately five percent of public school students experienced homelessness. High housing cost burden is also an issue for families in Riverside County. As noted in the kidsdata.org study of families between 2014-2018, approximately 43 percent of households with school age children experienced high housing cost burden.<sup>4</sup>

#### City of Banning Trends

Students in Banning are served by the Banning Unified School District (BUSD). Kidsdata.org estimated that 43 percent of children aged 0-17 in BUSD were living in households with high housing cost burden between 2014 and 2018. Additionally, five percent of families with children aged 0-17 in the BUSD experienced homelessness in 2018.<sup>5</sup> Figure 21 shows Banning TCAC scores related to access to education on a census tract level. In general, scores are moderate in the more affluent western portion of the city and lower in the less affluent central and eastern portion of the city.

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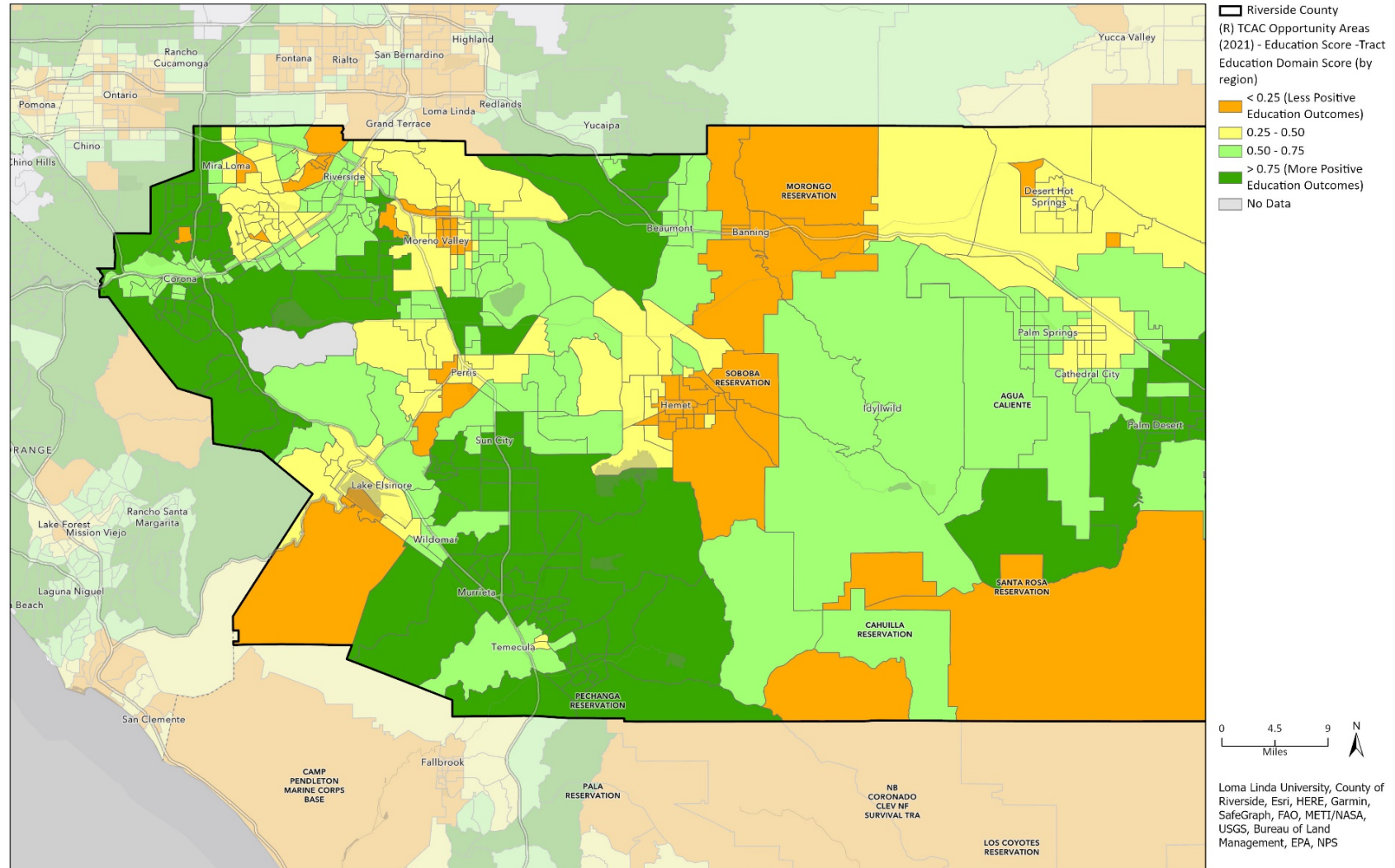
<sup>3</sup> AllTransit Metrics. Banning, CA. <https://alltransit.cnt.org/metrics/>: <https://alltransit.cnt.org/metrics/?addr=banning>

<sup>4</sup> KidsData Summary: Riverside County Familial Economics: <https://www.kidsdata.org/region/367/riverside-county/summary#37/family-economics>

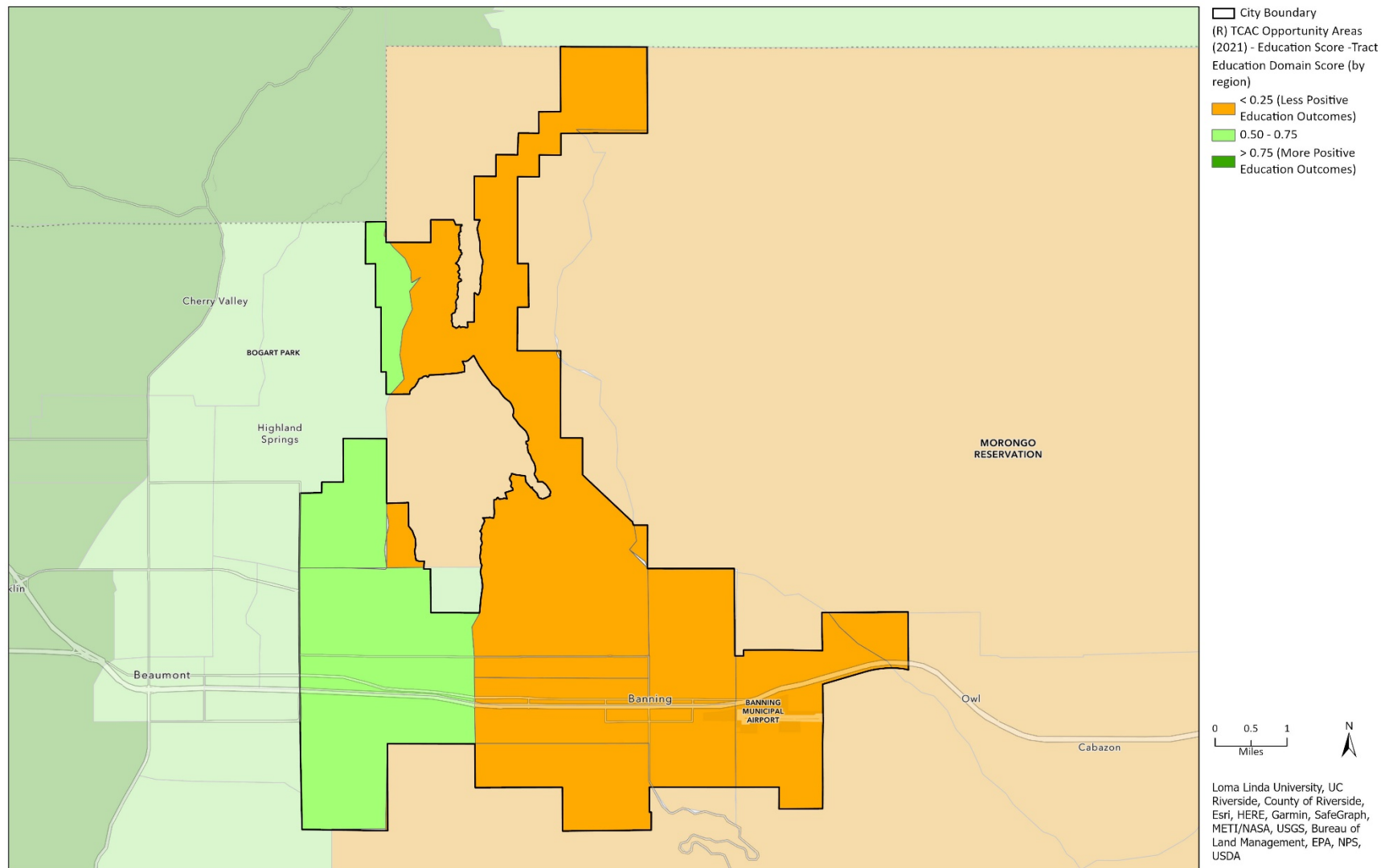
<sup>5</sup> KidsData Summary: Banning Unified Family Economics: <https://www.kidsdata.org/region/1084/banning-unified/summary#6/demographics>



**Figure 20 TCAC Opportunity Areas of Education (County of Riverside)**



Source: TCAC/HUD, 2021

**Figure 21 TCAC Opportunity Areas of Education (City of Banning)**

Source: TCAC/HUD, 2021



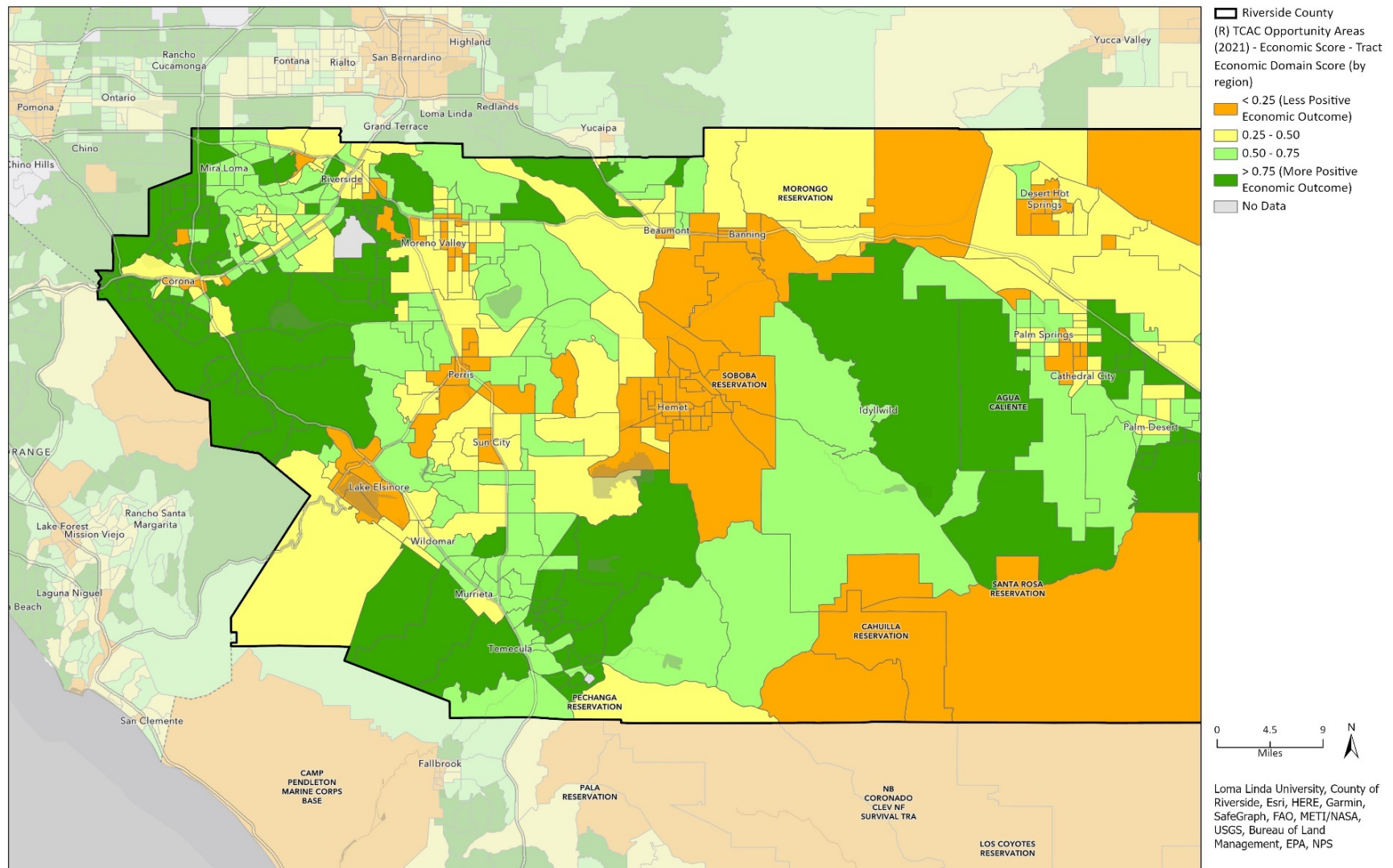
## Employment

### County of Riverside Trends

According to the California Employment Development Department, the unemployment rate of Riverside County was 7.2 percent in May 2021 (not seasonally adjusted). Riverside's top 10 employers are primarily in the medical, education, and municipal sectors. While one major retail company, Amazon, remains among the top ten county employers, it is surpassed by the U.S. Military; the University of California, Riverside; and regional government in terms of numbers of employees. A high proportion of managerial/professional and sales/office occupations are held by Riverside County residents. According to HUD:

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" (AFFH-T Data Documentation 2017). Educational attainment is a measure of those within a census tract who have achieved a bachelor's degree or higher. Values are ranked by national percentile and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood. The group with the highest Labor Market Index scores in both the jurisdiction and the region is Asians or Pacific Islander residents, at 41.0 percent. This group is followed by white residents, at 35.7; Black residents, at 29.7; then Native American residents, at 27.1, and Hispanic residents, at 25.0. HUD attempts to correct for income disparities by statistically separating out the population below the federal poverty level. For Riverside County residents with incomes below the poverty line, the numbers decrease by an average of 7.3 points, with the largest decrease, 10.3 percent, occurring among Asian and Pacific Islander residents with incomes below the level of poverty.

Figure 22 shows the TCAC Opportunity Areas map for economic outcomes across the county. Areas of more positive economic outcomes are located in the western portion of the county and near Temecula, Idyllwild, and in some of the desert communities in the eastern portion of the county.

**Figure 22 TCAC Opportunity Areas of Economic Outcomes (County of Riverside)**

Source: TCAC/HUD, 2021

## City of Banning Trends

The city had 9,761 employed residents, representing a labor force participation rate of 38.7 percent of persons 16 years and over. Table 7 shows the number of persons employed in each occupation sector and the corresponding percentage of the labor force. The unemployment rate was 4.0 percent compared to the county's unemployment rate of 4.5 percent. The largest occupation sector for Banning residents was educational, health care and social assistance, followed by retail trade and arts, entertainment, and recreation, accommodation, and food services.

**Table 7 Jobs Held by Banning residents**

| Occupation Sector   | Number of Jobs | Percent of Total |
|---|----------------|------------------|
| Agriculture, forestry, fishing and hunting, and mining                | 102            | 1.0              |
| Construction  | 722            | 7.4              |
| Manufacturing   | 828            | 8.5              |
| Wholesale trade   | 282            | 2.9              |
| Retail trade  | 1,678          | 17.2             |
| Transportation and warehousing, and utilities                         | 647            | 6.6              |
| Information   | 62             | 0.6              |
| Finance, insurance, real estate, and rental and leasing               | 328            | 3.4              |
| Professional, scientific, management, admin., and waste management    | 722            | 7.4              |
| Educational, Health care and social assistance                        | 2,108          | 21.6             |
| Arts, entertainment, and recreation, accommodation, and food services | 1,437          | 14.7             |
| Other services, except public administration                          | 507            | 5.2              |
| Public Administration   | 338            | 3.5              |
| <b>Total Employed Population</b>                                      | <b>9,761</b>   | <b>100</b>       |

Source: American Community Survey 2015-2019

Totals may not add up due to rounding.

A number of major employers are located in or near Banning. As shown in Table 8, major employers in and near the city include the County of Riverside, March Air Reserve Base, and University of California Riverside.

**Table 8 Major Employers in or near Banning**

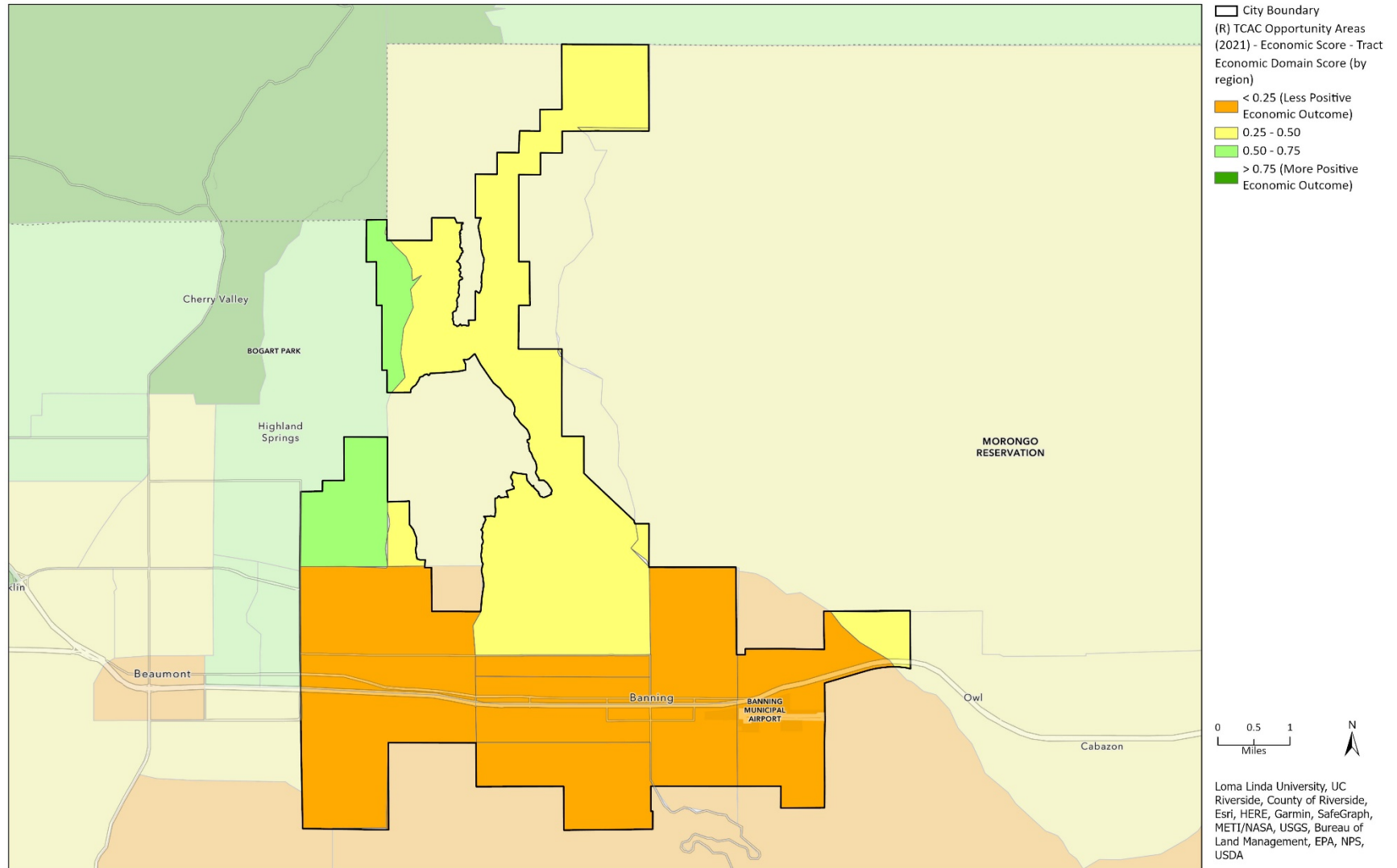
| Name of Employer                           | Number of Employees | Percent of Total County Employment | Type of Business    |
|--|---------------------|------------------------------------|---------------------|
| County of Riverside                        | 21,215              | 2.1                                | County Gov.         |
| March Air Reserve Base                     | 9,000               | 0.9                                | Military            |
| Univ. of California, Riverside             | 8,735               | 0.8                                | Education           |
| Kaiser Permanente Riverside Medical Center | 5,592               | 0.5                                | Medical             |
| Corona-Norco Unified School District       | 4,989               | 0.5                                | School District     |
| Pechanga Resort & Casino                   | 4,863               | 0.5                                | Leisure/Hospitality |
| Riverside Unified School District          | 4,236               | 0.4                                | School District     |

| Name of Employer                      | Number of Employees | Percent of Total County Employment | Type of Business |
|---------------------------------------|---------------------|------------------------------------|------------------|
| Hemet Unified School District         | 4,302               | 0.4                                | School District  |
| Eisenhower Medical Center             | 3,743               | 0.4                                | Medical          |
| Moreno Valley Unified School District | 3,684               | 0.4                                | School District  |

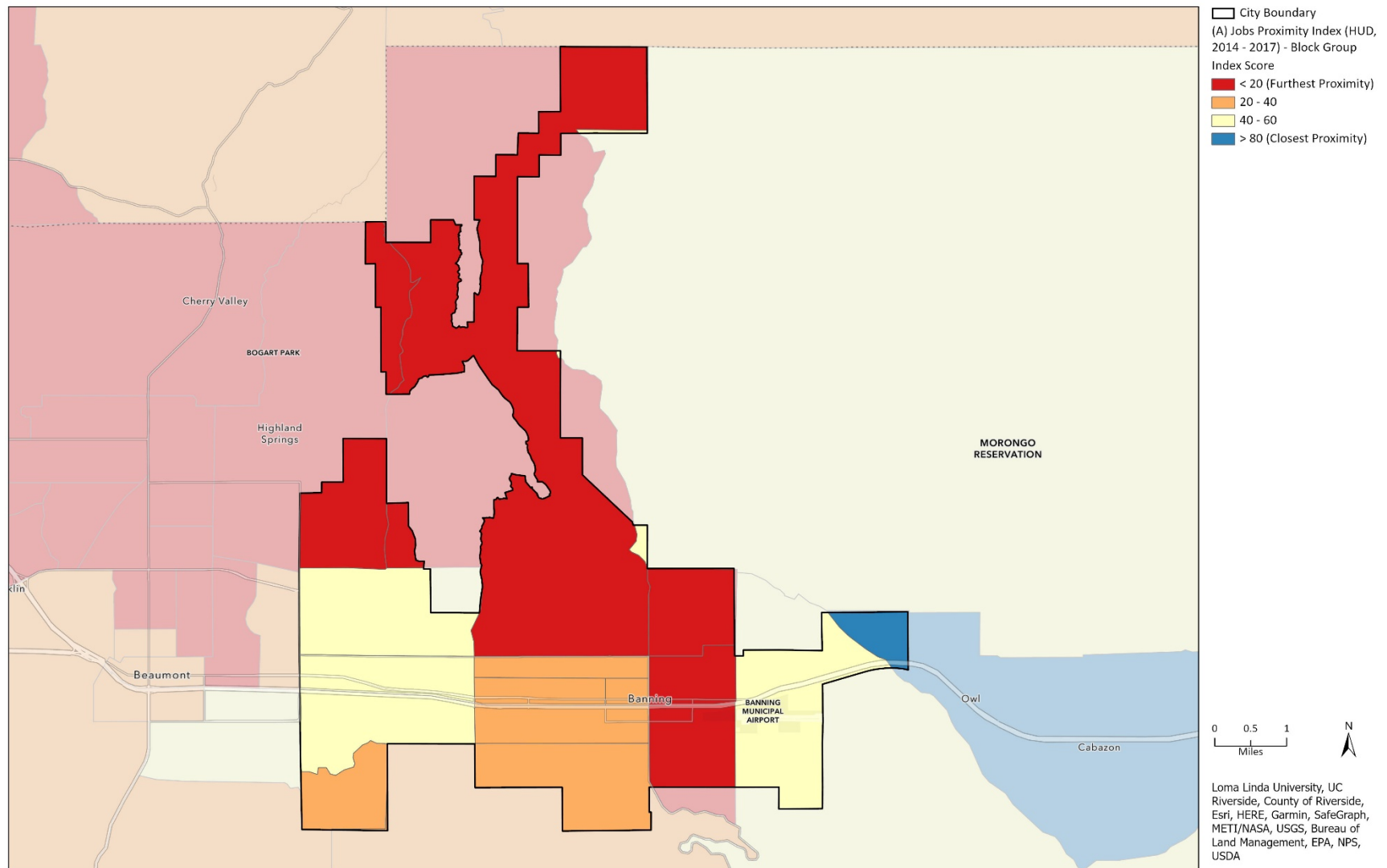
Source: Analysis of Impediments, 2019-2024

Figure 23 shows the TCAC Opportunity Areas map for economic outcomes in the city. As shown on the figure, Banning generally has relatively low economic TCAC scores, with the majority of the city having a score of less than 0.25. Economic scores are lowest in the southern half of the city, with higher scores in the northwest portion adjacent to Highland Springs. As shown on Figure 24, the northern portion of the city has the furthest proximity to jobs, while areas in the south have closer proximity. Job proximity is highest in the easternmost part of the city. Banning's status as a low density and predominantly suburban community contributes to these low scores.

**Figure 23 TCAC Opportunity Areas of Economic Outcomes (City of Banning)**



Source: TCAC/HUD, 2021

**Figure 24      Job Proximity Index (City of Banning)**

Source: AFFH Viewer 2021

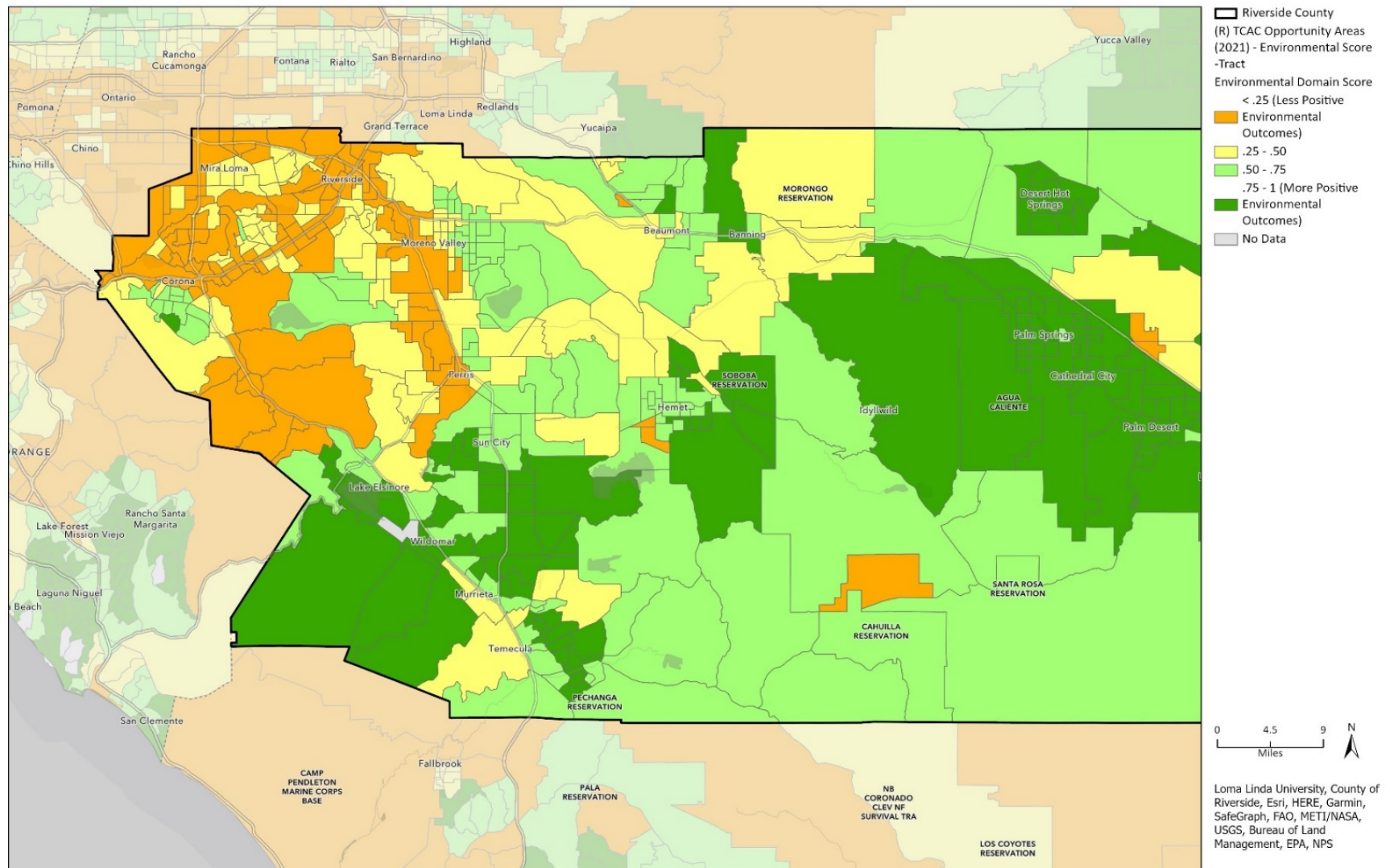
## Healthy Environment

Access to a healthy environment is necessary for communities to thrive. Healthy Environment in AFFH addresses patterns in the disparities found within the different neighborhoods and protected area groups. As previously mentioned, these disparities can vary from air quality, water quality, safe neighborhood, environmental hazards, social services, and cultural institutions. Without attention to these issues, jurisdictions will find themselves not in compliance with California legislation, including AB 1550, SB 535 and SB 1000, which emphasize the importance of environmental justice for housing efforts. 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 (CalEnviroScreen). High scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, considering socioeconomic characteristics and underlying health status.

### County of Riverside Trends

The County's overall CalEnviroScreen map identifies pollution and hazardous areas within the County of Riverside. This is an important tool which allows for the analyzation of people's vulnerability to pollution and whether communities are considered an SB 535 disadvantaged community. CalEnviroScreen reports scores as percentiles to compare tracts across the entire county. Figure 25 CalEnviroScreen Percentile Scores (shows the more urbanized, western portion of the County has less positive environmental outcomes.



**Figure 25 CalEnviroScreen Percentile Scores (County of Riverside)**

Source: AFFH Viewer 2021

**City of Banning Trends**

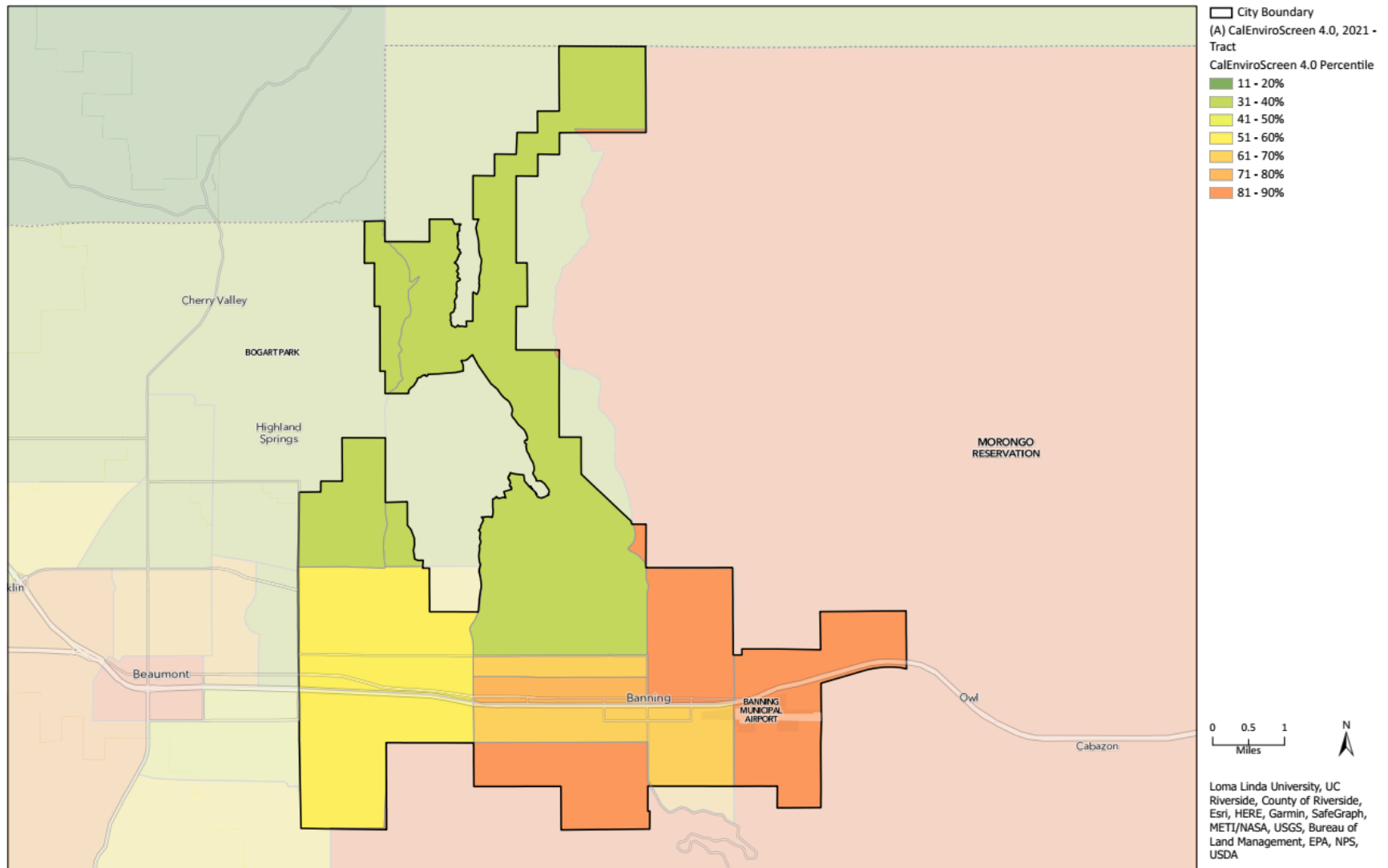
As shown in

Figure 26, the City has a large disparity in environmental outcomes. The southern and southeastern portions of the City had less positive environmental outcomes than the southwest and northern portions, which are further from the interstate and the airport, and close to undeveloped land. Unsurprisingly, areas close to the interstate in Banning have a high pollution burden for diesel particulate matter, ozone, and traffic.<sup>6</sup> These areas also tend to have higher concentrations of poverty and racial/ethnic minorities.

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<sup>6</sup> <https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-40>

**Figure 26 CalEnviroScreen Percentile Scores: City of Banning**



Source: AFFH Viewer 2021

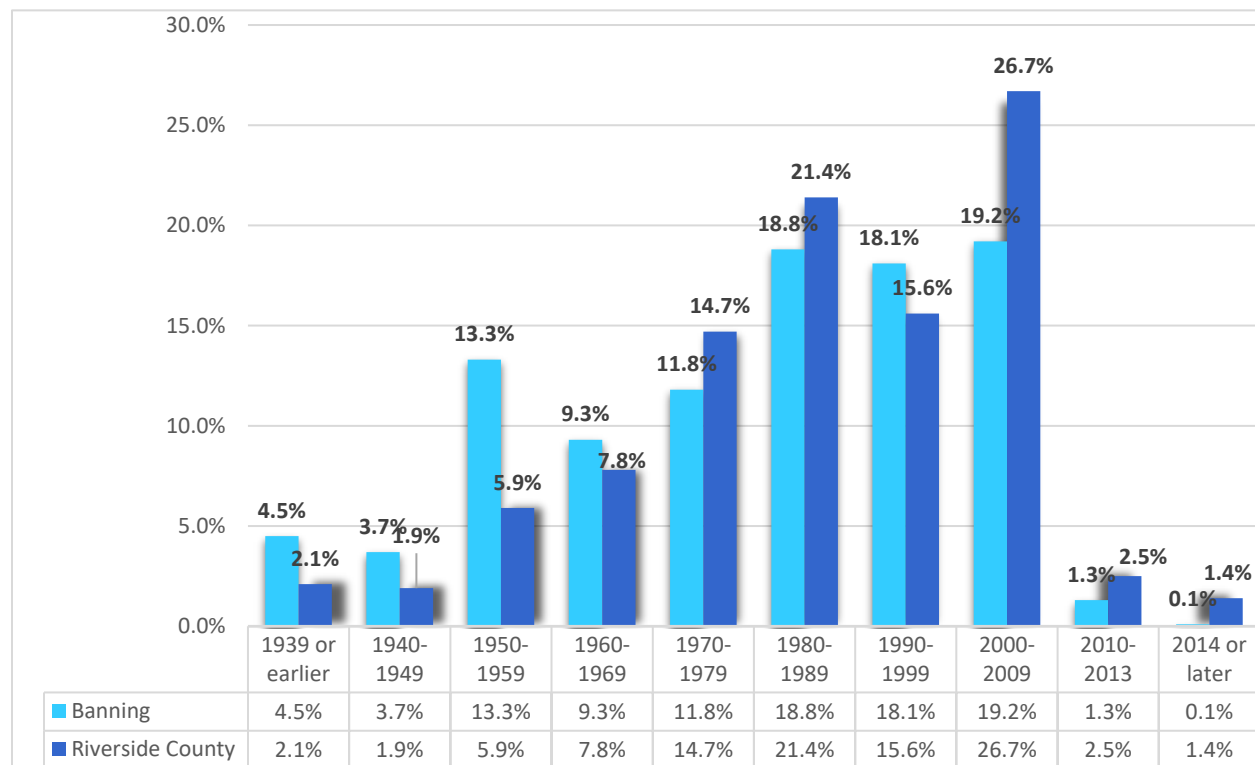
## Substandard Housing

Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs also use the age of housing as a factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs.

### County of Riverside Trends

As shown below in Figure 27, as of 2018, 53.8 percent of Riverside County's housing stock was built prior to 1990, which is 31 years ago. These units are potentially in need of repair and modernization improvements. Housing development in Riverside County generally follows an exponential growth trend up until 2009. 2000-2009 recorded the highest percentage of housing development in Riverside at 26.7 percent. There was a sharp decrease after 2009 where development was only 3.9 percent of the total housing stock from 2010-2018.

**Figure 27 Age of Housing Stock (City of Banning)**



Source: American Community Survey, 2015-2019.

The County of Riverside has 7,782 substandard housing units which comprise approximately one percent of the total occupied units in the county. A housing unit is considered substandard if it lacks complete plumbing or complete kitchen facilities. Of the 7,782 substandard units, approximately 30 percent lack complete plumbing facilities and 70 percent lack complete kitchen facilities.

**Table 9 Substandard Housing Units in Riverside County**

| Condition                            | Number of Occupied Units | Percentage of Total Occupied Units |
|--------------------------------------|--------------------------|------------------------------------|
| Lacking complete plumbing facilities | 2,347                    | 0.3                                |
| Lacking complete kitchen facilities  | 5,435                    | 0.7%                               |
| Total occupied substandard units     | 7,782                    | 1.0%                               |
| Total occupied units                 | 724,893                  | 100%                               |

Source: Bureau of the Census, American Community Survey, 2015-2019.

## City of Banning Trends

As shown above in Figure 27, as of 2018, approximately 61.4 percent of all housing units in Banning were built prior to 1990, potentially requiring minor repairs and modernization improvements. Housing stock had been generally increasing at a steady rate with the exception of a 13.3 percent surge during 1950-1959 from 3.7 at 1940-1949 for the City of Banning. Approximately 56.1 percent of the city's housing stock was constructed between 1980 and 2009, an earlier housing boom than other areas in the county.

Housing that is not maintained can discourage reinvestment, depress neighboring property values, and can negatively impact the quality of life in a neighborhood. Improving housing is an important goal of the city. HUD considers housing units to be "standard units" if they are in compliance with local building codes. According to Banning Code Enforcement, 43 properties are currently being investigated for substandard housing. The City received approximately 1,000 calls last year for housing code violations, equally distributed across the city. Any housing unit that includes conditions listed in Table 10 below, is considered substandard. Common housing code violations in Banning include problems with electrical wiring, plumbing, windows, roofs and exterior, and heating and air conditioning systems. Most of Banning's substandard units are suitable for rehabilitation. Approximately 2 percent of all occupied units in the city are considered substandard units. There are about 217 occupied substandard units in the city with approximately 25 percent of these 217 units lack complete plumbing and approximately 74 percent lack complete kitchens. According to 2017 CHAS data, extremely low-income households are disproportionately affected by housing problems. Approximately 30 percent of households experiencing at least one housing problem are categorized as extremely low income, while only 1.7 percent of households not experiencing housing problems are extremely low income.

**Table 10 Substandard Housing Units in Banning**

| Condition                            | Number of Occupied Units | Percentage of Total Occupied Units |
|--------------------------------------|--------------------------|------------------------------------|
| Lacking complete plumbing facilities | 56                       | 0.5                                |
| Lacking complete kitchen facilities  | 161                      | 1.5                                |
| Total occupied substandard units     | 217                      | 2.0                                |
| Total occupied units                 | 10,991                   | 100.0                              |

Source: Bureau of the Census, American Community Survey, 2015-2019.

# Homelessness

## County of Riverside Trends

Riverside County's January 2020 point-in-time count shown below in Table 11 approximately 2,155 number of unsheltered persons. There is an increase in residents experiencing homelessness over the previous year and revealed that one in five unsheltered people had lost their housing in the past year.<sup>7</sup> Factors contributing to the rise in homelessness include a lack of housing affordable available for low- and moderate-income households, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the de-institutionalization of persons with extreme developmental disabilities.

State law (Section 65583(1) (6)) requires municipalities to address the special needs of persons experiencing homelessness within their jurisdictional boundaries. "Homelessness" as defined by HUD, describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
  - An institution that provides a temporary residence for individuals intended to be institutionalized; or
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

## City of Banning Trends

As shown below in Table 11, there are an estimated 43 unsheltered persons in the City of Banning, comprising approximately two percent of the unsheltered population of Riverside County (unsheltered persons are persons who are unhoused and not residing at a shelter). Neighboring cities in Riverside County have a lower percentage of the county's population experiencing homelessness: Beaumont (0.7 percent), Calimesa (0.8 percent), and San Jacinto (1.5 percent).

The City of Banning, according to the City's Zoning Ordinance, allows group homes, including by inference, homeless shelters by Conditional Use Permit in the Business Park zone, High Density Residential zone, and Mobile Home Park zone. Emergency shelters are processed in the same manner as other multi-family projects. Residential occupancy or single-room occupancy hotels (SROs) can also be an important component of the special needs housing picture due to the relatively lower cost of rent and are permitted in the HDR zone with approval of a conditional use permit. The City recently amended the Zoning Ordinance to provide for the nondiscretionary siting of homeless shelters and to allow transitional and supportive housing facilities consistent with State law.

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<sup>7</sup> <https://www.desertsun.com/story/news/2020/05/06/riverside-county-point-time-survey-finds-increase-homeless-youth/5180757002/>



**Table 11 Unsheltered Persons in Banning and Surrounding Cities**

| Jurisdiction     | Unsheltered | Percent of Unsheltered Population in Riverside County |
|------------------|-------------|---|
| Banning          | 43          | 2.0   |
| Beaumont         | 16          | 0.7   |
| Calimesa         | 17          | 0.8   |
| San Jacinto      | 31          | 1.5   |
| Moreno Valley    | 165         | 7.8   |
| Riverside County | 2,155       | 100.0   |

Source: Riverside County Homeless Point in Time (PIT) Count, 2020 (<http://rchi.cs.ucr.edu/CityBreakdown>)

Note: Only unsheltered persons were included in the available data by city. The number of persons residing in shelters was unavailable.

There are resources provided to persons experiencing homelessness in the City of Banning. H.E.L.P Inc., a local nonprofit organization, is the primary service provider for persons experiencing homelessness in Banning and works with the City to provide food and clothing assistance for qualifying individuals and families. Sub-populations of the homeless include those with mental disabilities and substance abuse problems, those suffering domestic violence, persons with AIDS, veterans, youth, the unemployed, and extremely low/very low-income families. Each of these groups has different needs including substance abuse recovery, mental treatment, medical treatment, and job training and placement. Persons experiencing homelessness in Banning can access programs that operate through the County of Riverside, including: the Emergency Food and Shelter Program, the Homeless Management information System, the Continuum of Care for Riverside County, and the Housing and Urban Development Supportive Housing Program. Additionally, Banning residents, including persons experiencing homelessness, may be assisted by service providers that operate countywide. Table 12 identifies service providers available to assist persons experiencing homeless by sub-population.

**Table 12 Homeless Assistance Programs**

| Subpopulation                | Service Providers  |
|------------------------------|--|
| Elderly and Disabled         | Dial-A-Ride  |
| Alcohol/Drug Dependent Abuse | Critical Needs Hotline   |
| Domestic Violence            | RCCADV (Riverside County Center for Alternatives to Domestic Violence)<br>American Red Cross<br>Catholic Charities |
| Persons With AIDS/HIV        | Inland AIDS Project (Eastern County)<br>Desert AIDS Project (Western County)                                       |

City of Banning 2020

## Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen) while severe overcrowding refers to more than 1.5 persons per room. Large families in general have special housing needs due to lower per capita income, the need for affordable housing, or the need for larger units with three or more bedrooms, resulting in overcrowding.

Some households may not be able to accommodate high cost burden for housing but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding. Household overcrowding is reflective of various living situations: a family lives in a home that is too small; a family chooses to house extended family members; or unrelated individuals or families are doubling up to afford housing. However, cultural differences also contribute to the overcrowded conditions since some cultures tend to have a larger household size than others due to the preference of living with extended family members. Not only is overcrowding a potential fair housing concern, but it can also potentially strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes. As a result, some landlords or apartment managers may be more hesitant to rent to larger families, thus making access to adequate housing even more difficult. According to local fair housing service providers and property managers, addressing the issue of large households is complex as there are no set of guidelines for determining the maximum capacity for a unit. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with higher proportion of overcrowding.

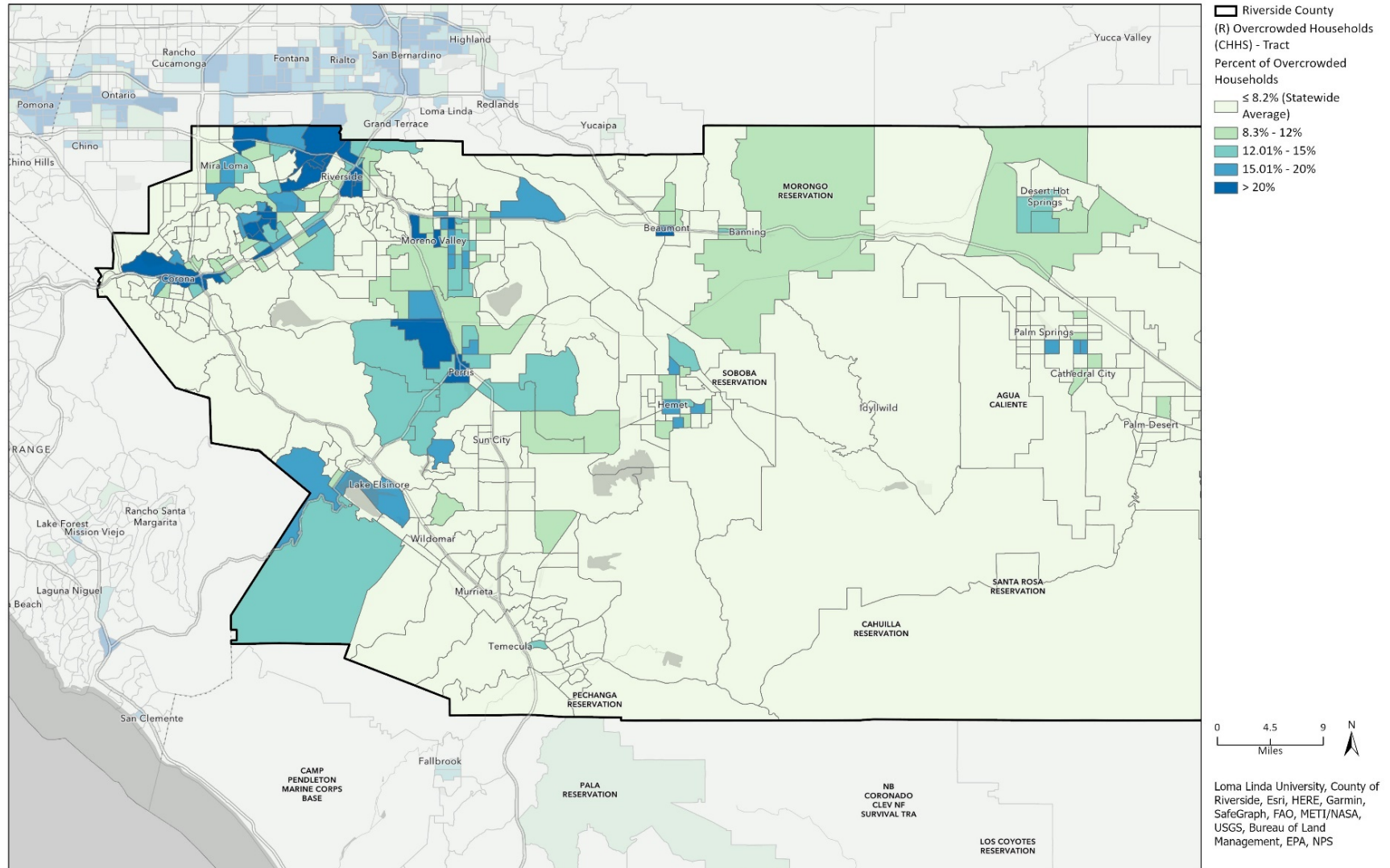
### **County of Riverside Trends**

According to the County of Riverside AI, the county had 129,419 large families, 35.2 percent of which earned what would be considered low and moderate income for a family of four, with roughly 14.4 percent falling into the extremely low-income category. Large families experience housing problems disproportionately, at 64.5 percent versus 49.4 percent of households generally. 3,843 two-bedroom units and 2,995 three or more-bedroom units are available within subsidized housing programs within the county. In total, 32 percent, or 3,934 units of the 12,287 total publicly supported housing program units are occupied by families with children. As shown in Figure 28, overcrowded housing is a greater issue in western Riverside County, mainly in urban centers such as the cities of Riverside, Corona, and Perris.

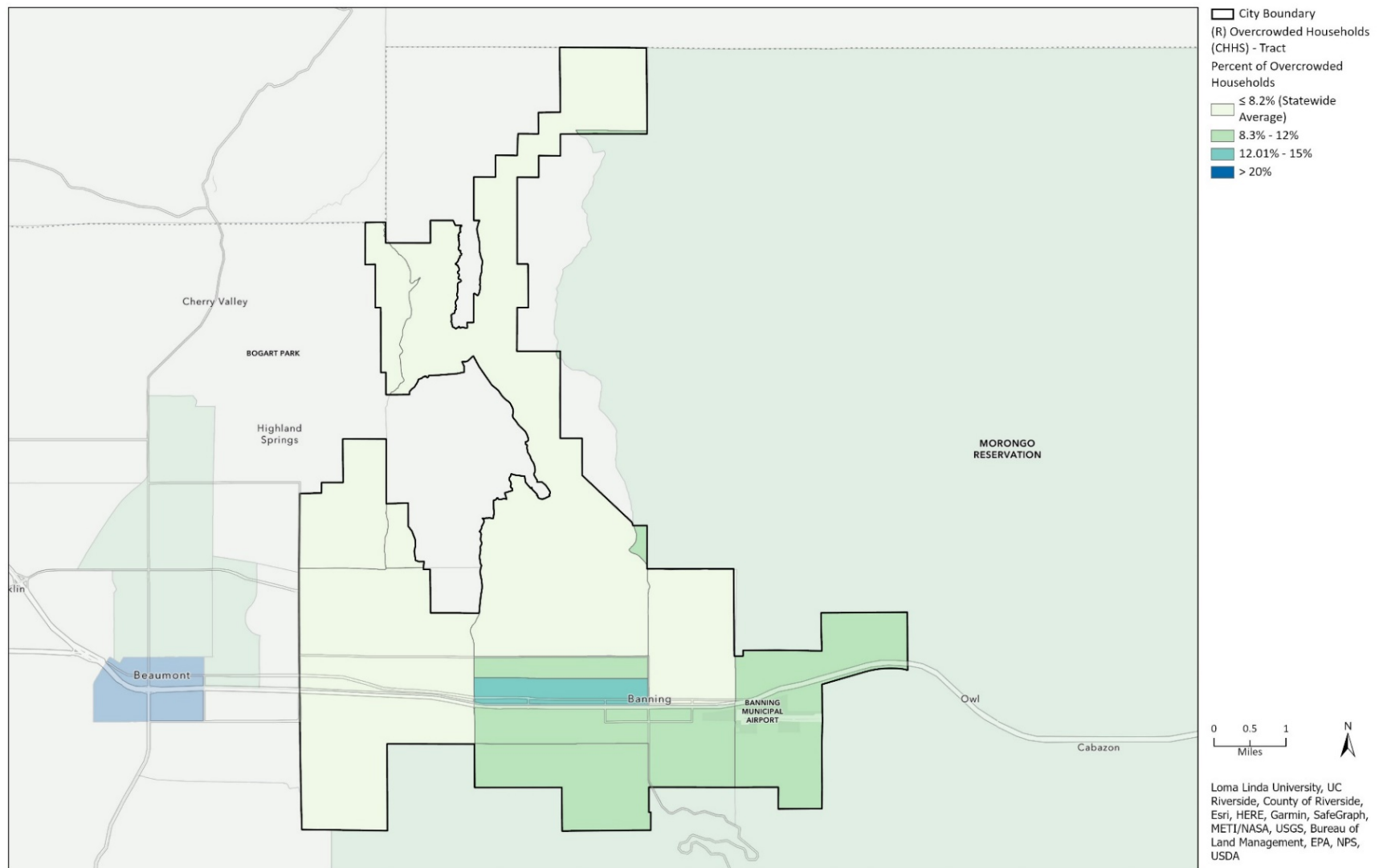
### **City of Banning Trends**

Based on 2014-2018 ACS estimates, Banning has a lower percentage of overcrowded households than the county as a whole (4.3 percent versus 5.0 percent), but a higher percentage of households that are considered severely overcrowded (2.3 percent versus 1.9 percent). Additionally, 6.5 percent of all households in Banning are considered overcrowded, of which 4.7 percent of overcrowded households are renter-occupied, whereas 1.8 percent are owner-occupied. Banning had an average of 2.7 persons per household in 2018, representing a slight increase from 2010, when an average of 2.4 persons per household was recorded. When compared with nearby cities, Banning had a smaller average household size than the cities of Beaumont (3.3 persons per household) and Cabazon (3.4 persons per household). As shown in Figure 29, between 12 and 15 percent of households in Census Tract 441.01 are overcrowded. Furthermore, higher percentages of overcrowded households are in the southeastern segment of the city north and south of I-10.

**Figure 28 Overcrowded Housing (County of Riverside)**



Source: AFFH Data Viewer, 2021

**Figure 29 Overcrowded Housing (City of Banning)**

Source: AFFH Data Viewer, 2021

## Displacement

The two primary key factors in visualizing displacement are the loss of low-income households and increases in rent. According to the UDP, neighborhoods are considered sensitive communities if they have a large percentage of residents at a higher risk of displacement due to increasing housing costs relative to other areas. According to the 2015-2019 ACS, Banning's median household income is \$42,274 while Riverside County's median household income is \$67,005. Banning's median household income is approximately 30 percent less than the regional median. Rents in Banning for 1-, 2- and 3-bedroom units are generally less expensive than the county average. Higher income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of income for housing and the likelihood of residing in overcrowded or substandard housing increases. Households with incomes below the poverty level, which are typically households classified as extremely low and very low incomes, may require special programs to assist them in meeting their rent and mortgage obligations.

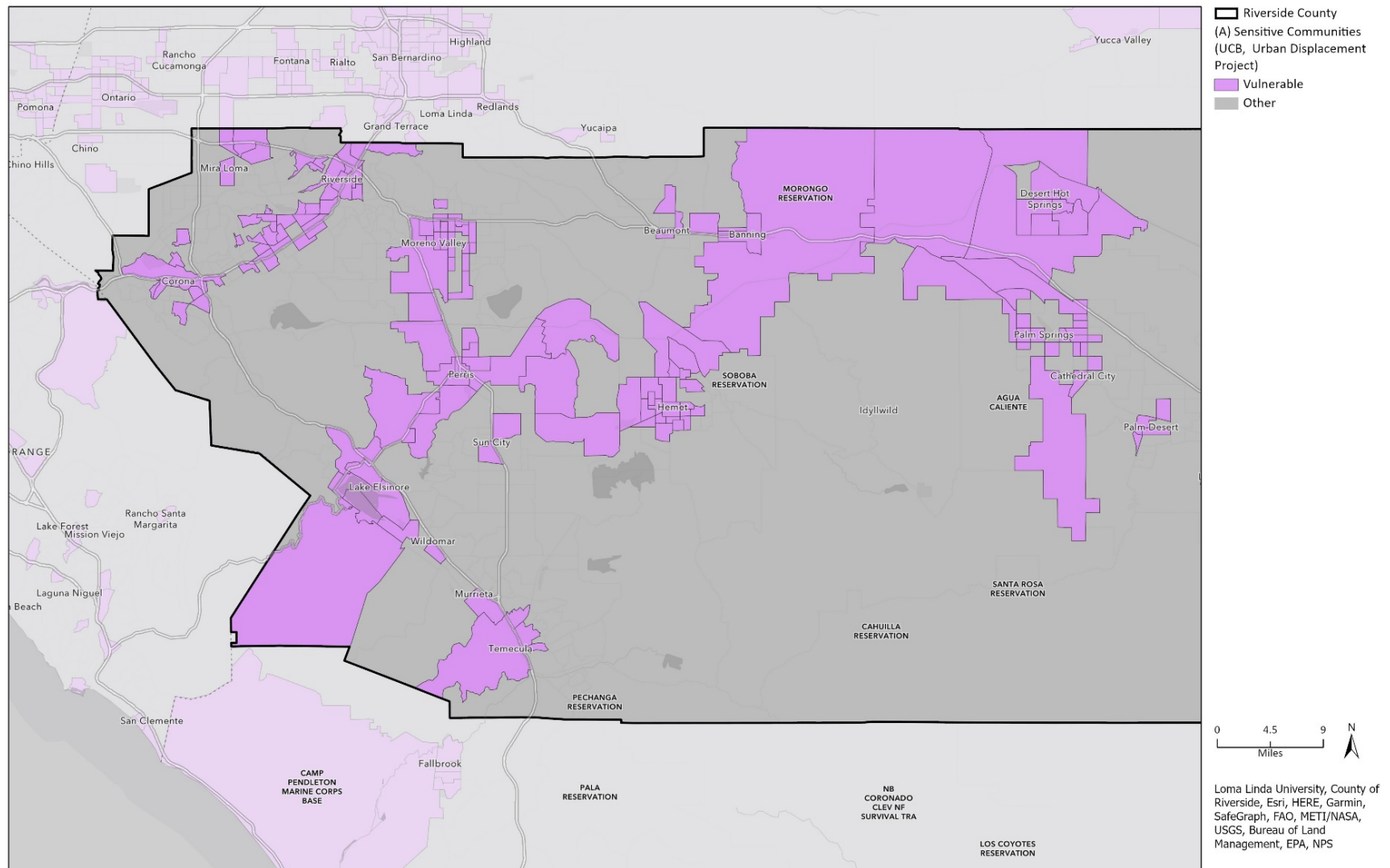
### **Riverside County Trends**

Sensitive communities presented on Figure 30 represent areas that are vulnerable to gentrification and displacement. Sensitive communities at risk of displacement occur throughout the urban areas in the County. Residents living in urban areas such as the cities of Riverside, Moreno Valley, Perris, Nuevo, Lake Elsinore, and Hemet are at risk of displacement, as are residents in more rural areas such as the Morongo Reservation. According to the County of Riverside Analysis of Impediments to Fair Housing Choice (2019), geographic areas in which households experiencing high cost burden are northwest of Palm Springs (including the City of Banning), around the City of Perris, and in the extreme southwestern region of the county in what appears to be unincorporated territory south of Murrieta. The cost burden trends in the aforementioned areas appear to mirror the trends of the sensitive areas in Riverside County. These sensitive areas have a positive correlation to the overcrowded parcels in Riverside County and an inverse relationship to economic outcomes. The more sensitive and overcrowded a parcel is, the less positive the economic outcome.

### **City of Banning Trends**

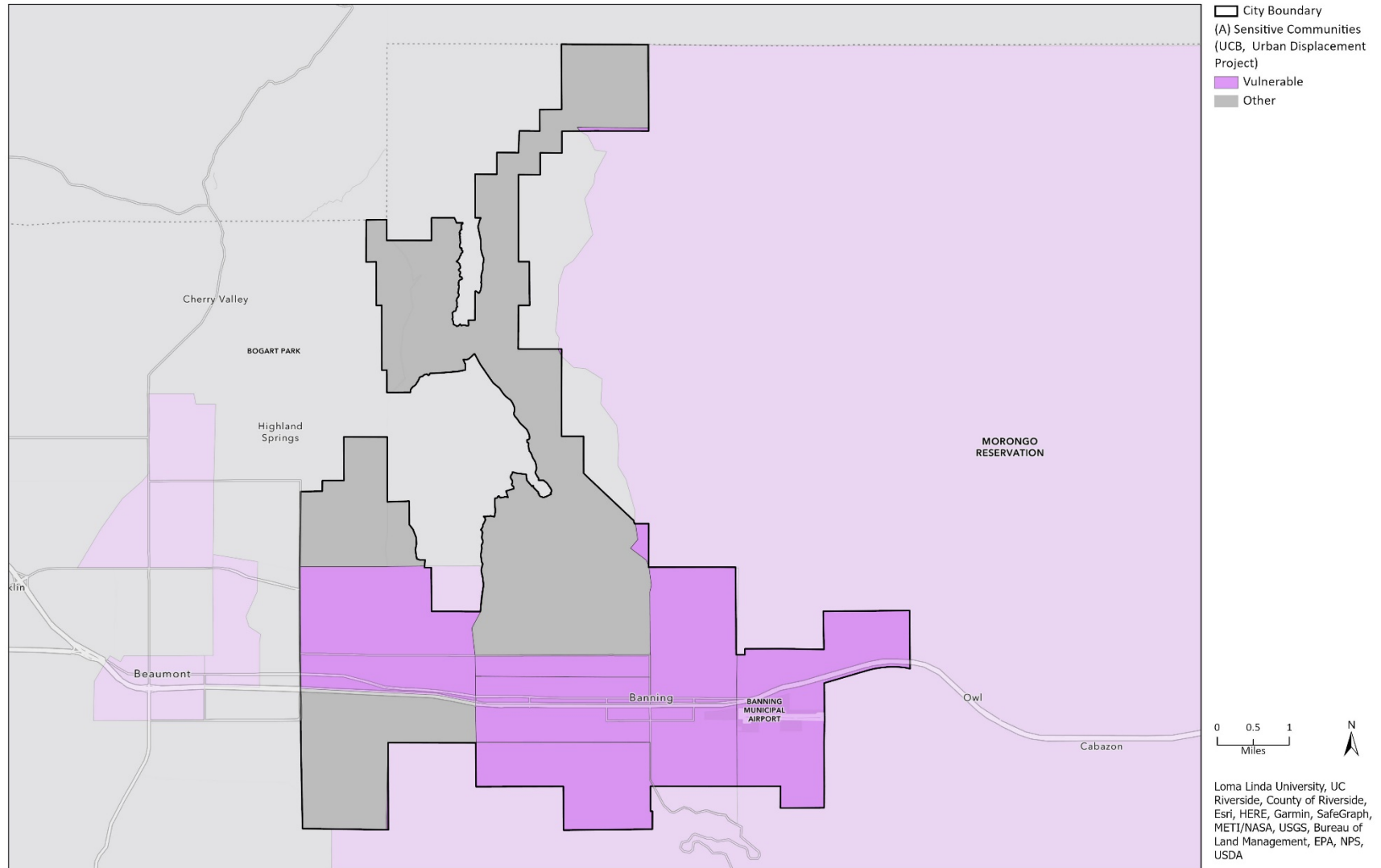
In Banning, the areas with greatest risk of displacement are also the areas where residents tend to have lower median incomes. According to the AFFH 2021 data, many communities of the city are considered sensitive for displacement risk. Vulnerable communities are concentrated in the southern region of Banning to the north and south of I-10 (Census Tracts 441.01-441.03, 442, and 443). These neighborhoods depict areas where a large percentage of residents face a higher risk of displacement due to increasing housing costs relative to other areas in the city. Of all households in Banning, 16 percent of extremely low-income households are experiencing housing cost burden. Furthermore, approximately 25 percent of renters living in extremely low-income households are experiencing housing cost burden as compared to 11 percent of owners. Other characteristics of these area include patterns of low and moderate income, poverty, overcrowding, and predominant minority population.

**Figure 30 Sensitive Communities (County of Riverside)**



Source: AFFH Data Viewer, 2021

**Figure 31**                      **Sensitive Communities (City of Banning)**



Source: AFFH Data Viewer, 2021



## Disproportionate Housing Needs: Contributing Factors

- Patterns of racial and ethnic concentration
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Location and type of affordable housing
- Limiting local land use policies
- Unaffordable rents and sales
- Shortage of subsidized housing units
- Dominance of single-family housing
- Discriminatory lending practices
- Location and type of affordable housing
- High levels of overcrowding
- Cost of repairs or rehabilitation

## Other Relevant Factors

Other contributions that affect the accumulation of wealth and access to resources include historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing. Historically, exclusionary housing policies such as redlining and discriminatory racial covenants reduced economic opportunities and quality of life for minorities by denying them mortgages and encouraging disinvestment areas in minority-concentrated communities.

The City applies for and receives an annual allocation of Community Development Block Grant/Emergency Solutions Grant (CDBG)/(ESG) funds from the U.S. Department of Housing and Urban Development (HUD) through Riverside County Economic Development (EDA). Between 2015 and 2020, the City has successfully implemented housing, community development, and economic development through the use of CDBG funds, reaching thousands of low- and moderate-income individuals. The City and its partners have made a significant impact on LMI neighborhoods and individuals in Banning. The following public services and city related projects were funded in the 2015-2020 period:

- Alternatives to Domestic Violence
- Boys and Girls Club of the San Geronio Pass
- First Missionary Baptist Church Homeless Food Bank
- Habitat for Humanity construction of a single-family residence for an income challenged family
- City of Banning Projects:
  - Lions Park
  - Dysart Park
  - Sylvan Park
  - Roosevelt Williams Park
  - Community/Senior center with ADA renovations
  - Retail Recruitment

Historically, there has been a lack of available housing in the City of Banning and rural areas of the county. This is partially due to a weak pull factor for investors and developers to build on poor land value in a rural inland area.

Lack of infrastructure developments in Banning reduce the quality of life for residents and further exacerbates the discrimination of lower income residents with reduced affordability and opportunities. The cost of land in and near the city represents a significant portion of the cost of new construction. In general, acquisition costs for entitled single-family subdivisions with infrastructure extension plans are higher than for raw land. As Banning becomes increasingly built-out and future development becomes more reliant upon the acquisition of underutilized parcels and demolition of existing structures, the cost of a finished residential site will further increase. The cost burden will likely transfer over to tenants of the residential site and will cause increased stress on lower income renters.

The City recently entered into a joint venture agreement with the Cherry Valley Water District to share water from three additional wells in Beaumont. Wastewater generated is treated by the City-managed Wastewater Utility Department. Senate Bill 1087 (enacted 2006) requires that water and wastewater service providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water and sewer providers from denying or conditioning the approval of development that includes housing affordable to lower income households unless specific written findings are made. The City of Banning will continue to coordinate with outside districts to ensure priority service provision to affordable housing developments.

The conversion of federally- and -state-subsidized affordable rental developments to market-rate units can constitute a substantial loss of housing opportunity for low-income residents. However, this will not be an immediate issue in the City of Banning as the earliest expiration date of the subsidized housing units in the city is in 2058, as shown in Table 13 below. There are three affordable housing developments located in Banning with a total of 237 affordable units that rely on Section 202, Section 811, and/or Section 8 assistance. The underlying income use restrictions of these projects were reviewed for potential conversion to market rate during this planning period. During this 10-year period, no projects will be at risk of losing their affordability controls. No assisted units will be at risk over the 2021-2029 planning period.

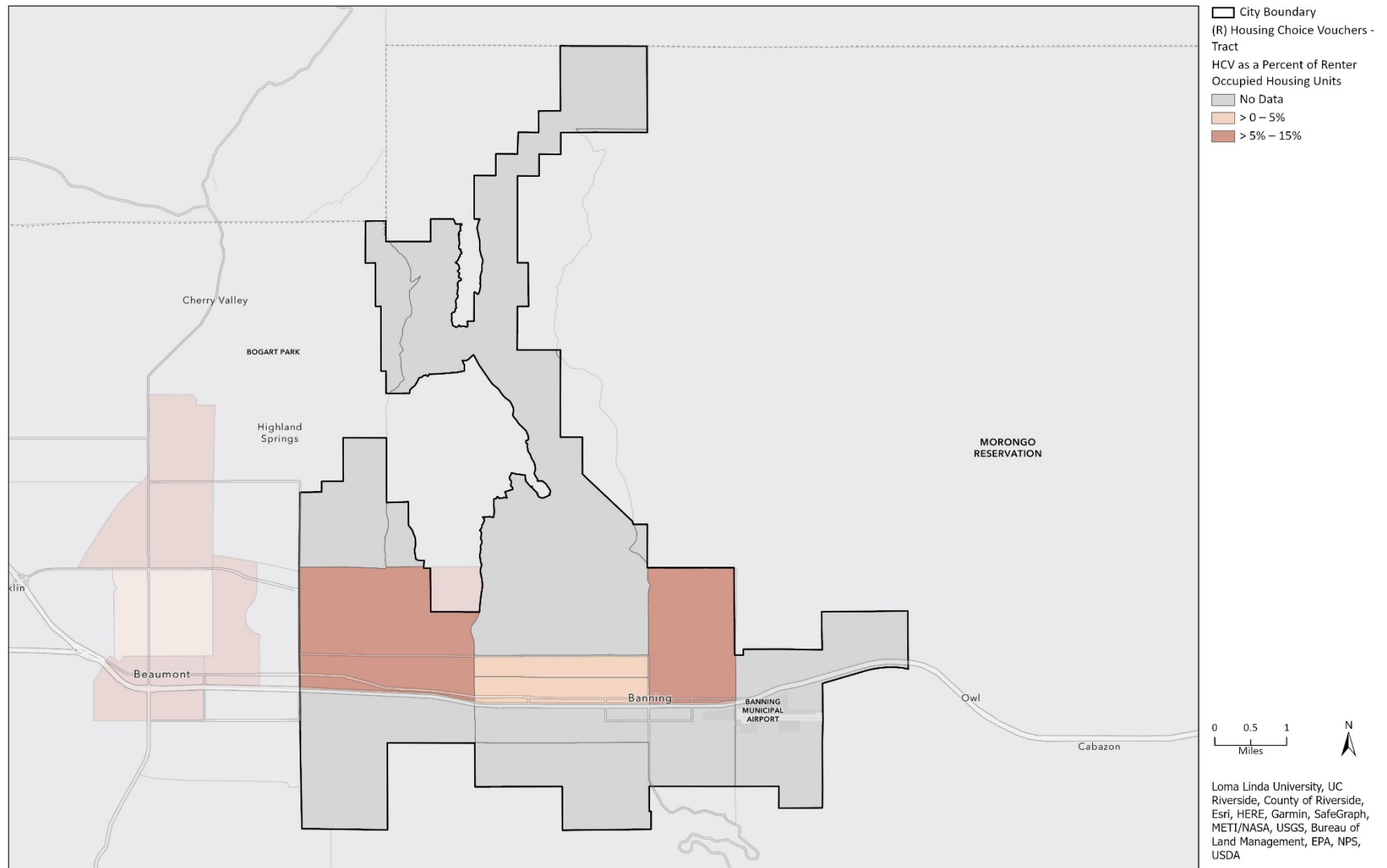
**Table 13 Assisted Housing Developments in Banning**

| Housing Complex             | Location                 | Total Units | Assisted Units |            |           |          | Total Assisted | Expiration Date | Funding            |
|-----------------------------|--------------------------|-------------|----------------|------------|-----------|----------|----------------|-----------------|--------------------|
|                             |                          |             | Very Low       | Low        | Senior    | Moderate |                |                 |                    |
| Westview Terrace Apartments | 287 West Westward Avenue | 75          | 0              | 74         | --        | 0        | 74             | 2065            | HUD, LIHTC, CalHFA |
| Peppertree Apartments       | 426 E. Nicolet Street    | 81          | 0              | 80         | --        | 0        | 80             | 2058            | LIHTC              |
| Summit Ridge Apartments     | 555 N. Hathaway Street   | 81          | 0              | 80         | --        | 0        | 80             | 2058            | LIHTC              |
| <b>TOTAL</b>                | <b>--</b>                | <b>237</b>  | <b>0</b>       | <b>234</b> | <b>--</b> | <b>0</b> | <b>234</b>     | <b>--</b>       | <b>--</b>          |

Source: City of Banning Redevelopment Agency, 2020; HUD Expiring Section 8 Database, 2020

As shown on in Figure 32, high concentrations of Housing Choice Voucher recipients are present in Census Tracts 442.03 and 442 (5.0 to 15.0 percent). Census Tract 442.03 is considered a moderate resource area while Census Tract 442 is considered an area of high segregation and poverty.

**Figure 32 Housing Voucher Recipients (City of Banning)**



Source: AFFH Data Viewer, 2021

## Sites Inventory

The housing element must demonstrate that there are adequate sites zoned for the development of housing for households at each income level sufficient to accommodate the number of new housing units needed at each income level as identified in the RHNA. In the context of AFFH, the site identification requirement involves not only an analysis of site capacity to accommodate the RHNA, 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.

## Opportunity Areas

HCD and CTAC have created opportunity maps to identify areas throughout the state whose characteristics support positive economic (low poverty, high employment, high median household income), educational (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes (low exposure to pollution) for low-income families—particularly long-term outcomes for children. The HCD/TCAC Opportunity Areas Map ranks Census tracts in Highest Resource to Low Resource based on these outcomes. A Census tract with a designation of High Resource would indicate that the Census tract has strong educational and economic opportunities, meaning opportunity for current and future residents.

For purposes of evaluating fair housing, resource levels designated by the TCAC/HCD map report on access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. Approximately 78 percent of the city is considered low resource, 19 percent is considered moderate resource, and approximately three percent is designated as areas of high segregation and poverty. The majority of the City's area is considered Low Resource, with Moderate Resource areas to the west (Census Tract 441.03 and a portion of Census Tract 438.09). There are no areas of Banning considered high resource or highest resource. The center of the city (Census Tract 441.01) is considered an area of High Segregation and Poverty. Figure 33 shows the location of the Housing Element opportunity sites by TCAC-designated resource area.

Most of the housing opportunity units are in lowresource areas (89 percent), including 100 percent of above moderate-income units. Eleven percent of housing sites are located in moderate resource areas. In terms of proportionality, 94 percent of moderate and above-moderate units are in low resource areas, despite low resource areas comprising only 78 percent of the city. Lower-income units are also proportionally more prevalent in low resource areas (86 percent of lower-income units in low resource areas, compared to 78 percent of the city area); however, low resource areas are generally more appropriate for lower-income households due to proximity to neighborhood uses such as schools.

The housing opportunity sites will add the following units to low resource areas:

- 285 very low-income units (83 percent of total very low-income units)
- 193 low-income units (91 percent of total low-income units)
- 222 moderate-income units (92 percent of total moderate-income units)
- 112 above moderate-income units (100 percent of total above moderate-income units)

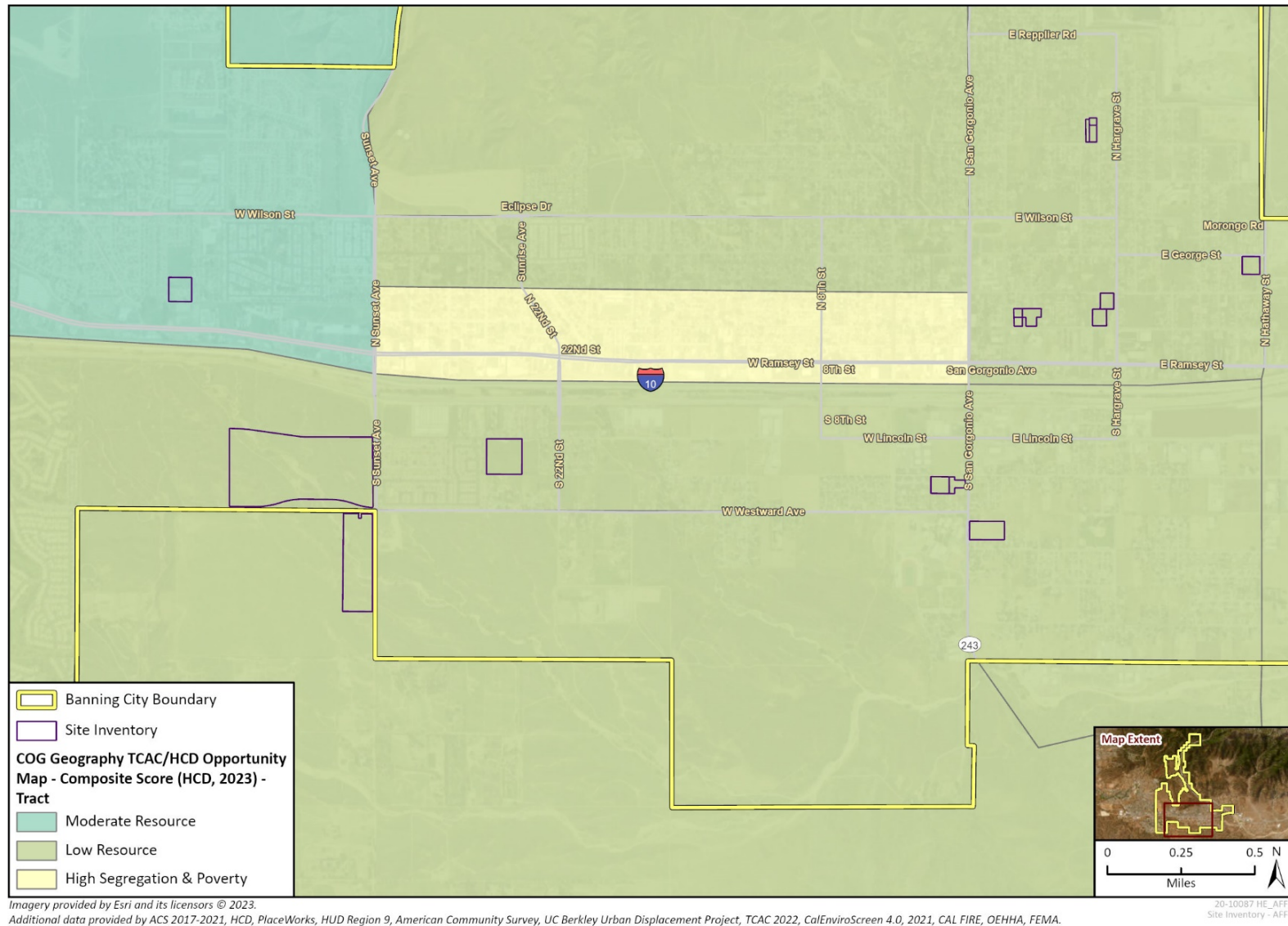
The housing opportunity sites will add the following units to Moderate Resource areas in the city:

- 57 very low-income units (17 percent of total very low-income units)
- 20 lower-income units (nine percent of total lower-income units)
- 20 moderate-income units (eight percent of total moderate-income units)

Most sites are located in low-resource areas due to the availability of sites for development and the prevalence of low-resource areas in the city. All of the above moderate-income units and almost all moderate-income units are located in low resource areas, improving the mixture of housing opportunities by income level in the city and providing opportunities for housing mobility. Several sites can accommodate a mix of units by household income level, and the geographic distribution of the sites does not concentrate lower-income housing in any one area of the city. Additionally, the eastern areas of the city (west of Sunset Avenue) have greater access to services and education centers, and are therefore more beneficial locations for lower- and moderate-income households than western Banning.

The City will target resources to low-resource areas by implementing focused place-based community development initiatives, and will use the housing opportunity sites as a catalyst for economic development and revitalization of established communities.

No sites are located in Census tract 441.01 (an area of high segregation and poverty). However, the City is currently planning to focus efforts on revitalizing this area. the City adopted an amendment to Title 17.12 of the Banning Municipal Code in October 2023 to allow for the new construction of multi-family housing and mixed-use projects in the Downtown Commercial (DC) zone. This DC zone is bounded by San Geronio Avenue to the east, Nicolet Street to the north, Interstate 10 to the south, and 8<sup>th</sup> Street to the west, which overlaps with a portion of Census Tract 441.01. This amendment to the zoning code will lead to future housing opportunities and economic development in this area.

**Figure 33 Site Inventory by Opportunity Areas Map (City of Banning)**

Source: AFFH Data Viewer, 2021



## Sites by Income Population

The percentage of Low to Moderate Income (LMI) households vary across the city. Census tracts with more than 50 percent LMI households are located primarily in the southeastern area of the city. Census tracts with the lowest percentage of LMI households are Census Tract 441.04 in the northern portion of the city, and census tracts 438.09 and 441.03 in the western part of the city. The census tracts with the with the highest percentage of LMI households are 442 and a portion of 441.01 in the south-central portion of the city.

As shown in Figure 34, most of the housing opportunity sites (89 percent of all assumed units regardless of income category) are in communities with higher rates of LMI households. Broken down by income category, 342 units appropriate for very low-income households (100 percent of the total very low-income units), 213 units appropriate for low-income households (100 percent of the total low-income units), 193 units for moderate-income households (80 percent of the total moderate-income units) and 62 units for above moderate-income households (55 percent of the total above moderate-income units) are located in areas with higher rates of LMI households. The Site Inventory assumes the areas of the city with less than 50 percent LMI households could accommodate 49 units appropriate for moderate-income households and 50 units for above moderate-income households. Lower-income areas in Banning will benefit from the mix of households of differing income levels and additional housing options. Private investment in these areas can spur community revitalization in ways that advance housing equity in Banning.

## Sites by Overcrowded Households

The majority of the northern and center portion of city has overcrowding rates that range between five and ten percent. The southwestern and southeastern portion of the city, including Census Tracts 441.03, 438.12, and 438.13, have overcrowding rates of less than five percent. Figure 35 show the Site Inventory by percent of overcrowded households.

The Site Inventory assumes that areas with lower rates of overcrowding (less than five percent) could accommodate 286 units (31 percent of the city's total Site Inventory), including 57 units appropriate for very low-income households (17 percent of the total very low-income units), 20 units appropriate for low-income households (nine percent of the total low-income units), 114 units for moderate-income households (47 percent of the total moderate-income units) and 95 units for above moderate-income households (85 percent of the total above moderate-income units). The Site Inventory assumes that areas with higher levels of overcrowding (between five and 10 percent) could accommodate 623 units (69 percent of the Site Inventory), including 285 units appropriate for very low-income households (83 percent of the total very low-income units), 193 units appropriate for lower-income households (91 percent of the total low-income units), 128 units appropriate for moderate-income households (53 percent of the total moderate-income units), and 17 units for above moderate-income households (15 percent of the total above moderate-income units). The Site Inventory will not exacerbate overcrowding conditions but will add new housing opportunities across all income levels throughout the city, which will lessen the concentration of overcrowded households in the center of the city.

## Sites by Overpayment by Renters

The percentage of renter households that overpay for housing varies throughout the city. Overpayment in the northern part of the city, including census tracts 441.04, 438.09, and 442 ranges between 40 and

60 percent of households. Overpayment in the center of the city, including census tracts 441.03, 443, 441.01, and 441.02 ranges between 60 and 80 percent of households. The southwestern portion of the city (Census Tract 438.12) has the highest rate of overpayment with over 80 percent of renters paying more than 30 percent of their income on rent. The census tract with the lowest levels of overpayment (less than 20 percent) is 438.13, which encompasses the most southern and southeastern portion of the city. Figure 36 shows the Site Inventory by overpayment by renter households.

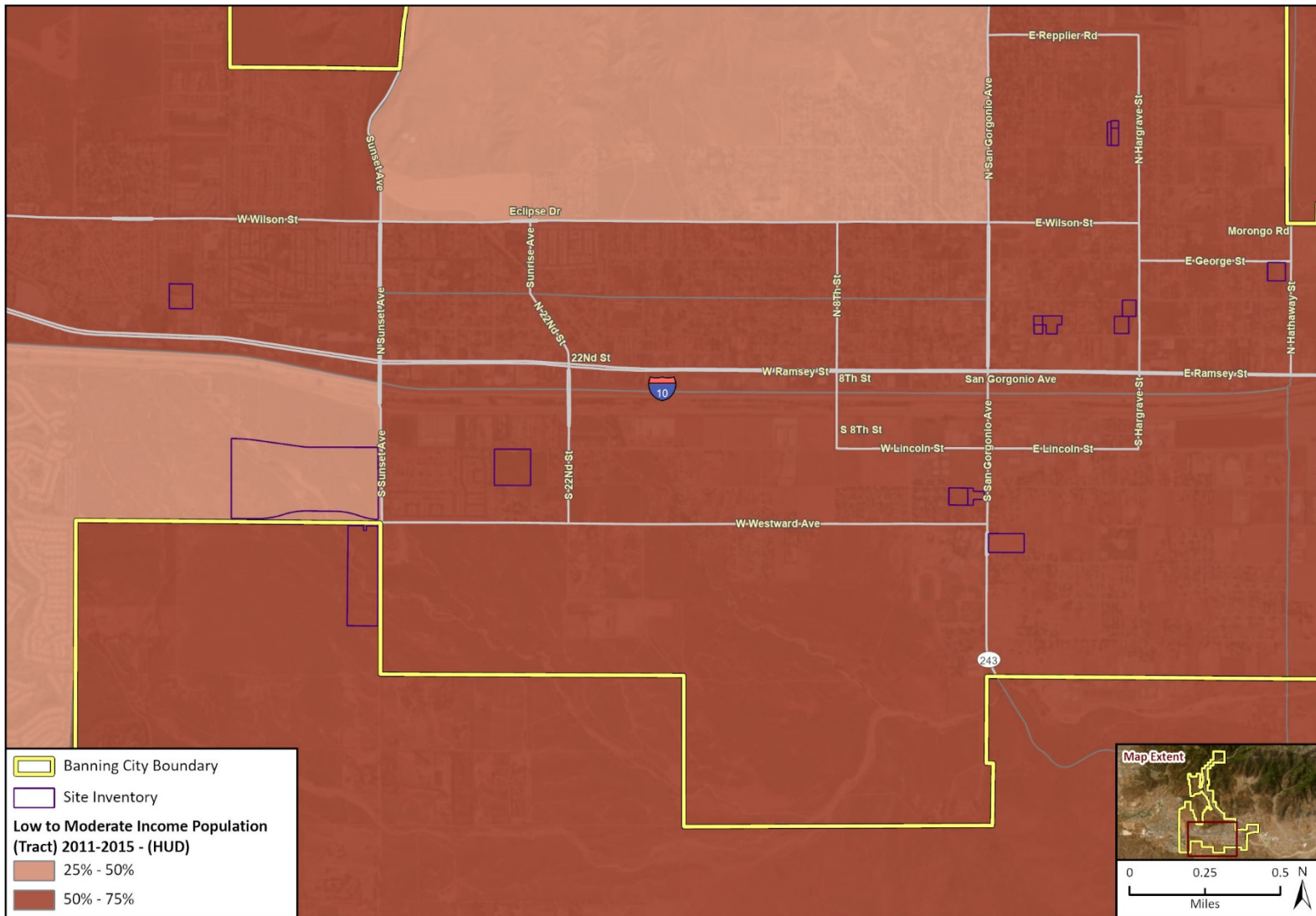
More than half of the units in the Site Inventory (515 units, or 57 percent of the inventory) are located in areas where overpayment by renters is high and ranges from 60 to 80 percent of households. This includes 262 units appropriate for very low-income households, 172 units appropriate for low-income households, and 81 units appropriate for moderate-income households. There is one housing opportunity site in an area with low levels of overpayment by renters (less than 20 percent) in the southern portion of the city. This site can accommodate 90 units, or 10 percent of the city's total Site Inventory, including 45 moderate-income units and 45 above moderate-income units. Areas with overpayment by renters ranging from 40 to 60 percent can accommodate 205 units, or 23 percent of the total Site Inventory. This includes 80 units appropriate for very low-income households (23 percent of the total very low-income units), 41 units appropriate for low-income households (19 percent of the total low-income units), 67 units for moderate-income households (28 percent of the total moderate-income units) and 17 units for above moderate-income households (15 percent of the total above moderate-income units). One housing opportunity site is in an area where overpayment by renters exceeds 80 percent. This site can accommodate 49 units appropriate for moderate-income households and 50 units appropriate for above moderate-income households.

According to the UDP, new market-rate construction in gentrifying areas neither worsens nor eases rates of people moving out of the area.<sup>8</sup> It increases rates of people moving to an area across all socio-economic groups, particularly high-socio-economic residents. The mix of lower-, moderate, and above moderate-income housing units in areas with high overpayment rates will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move into the area. The Site Inventory will add new rental housing opportunities which may alleviate high costs due to lack of availability.

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<sup>8</sup> Chapple, Hwang, Jeon, Zhang, Greenberg, and Kumar. New Development for Whom? How New Housing Production Affects Displacement and Replacement in the San Francisco Bay Area. 2022. [https://www.urbandisplacement.org/wp-content/uploads/2022/03/IGS\\_1\\_New-Production\\_Brief\\_03.01.22.pdf](https://www.urbandisplacement.org/wp-content/uploads/2022/03/IGS_1_New-Production_Brief_03.01.22.pdf), accessed August, 2023.

**Figure 34 Housing Opportunity Sites by LMI Population (City of Banning)**



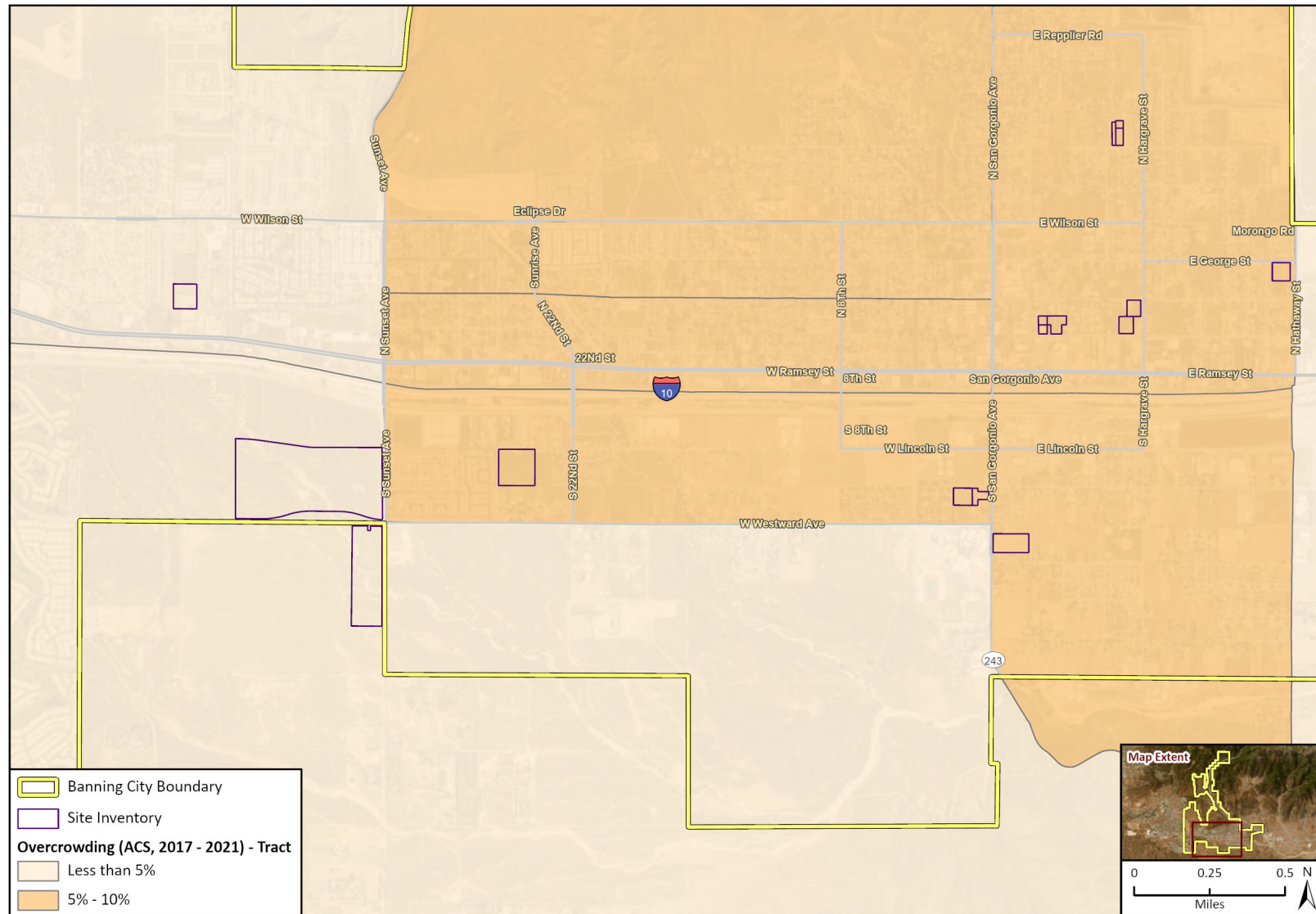
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Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

20-10087 HE\_AFFH  
Site Inventory - AFFH

Source: AFFH Viewer, 2023

**Figure 35 Housing Opportunity Sites by Overcrowding (City of Banning)**



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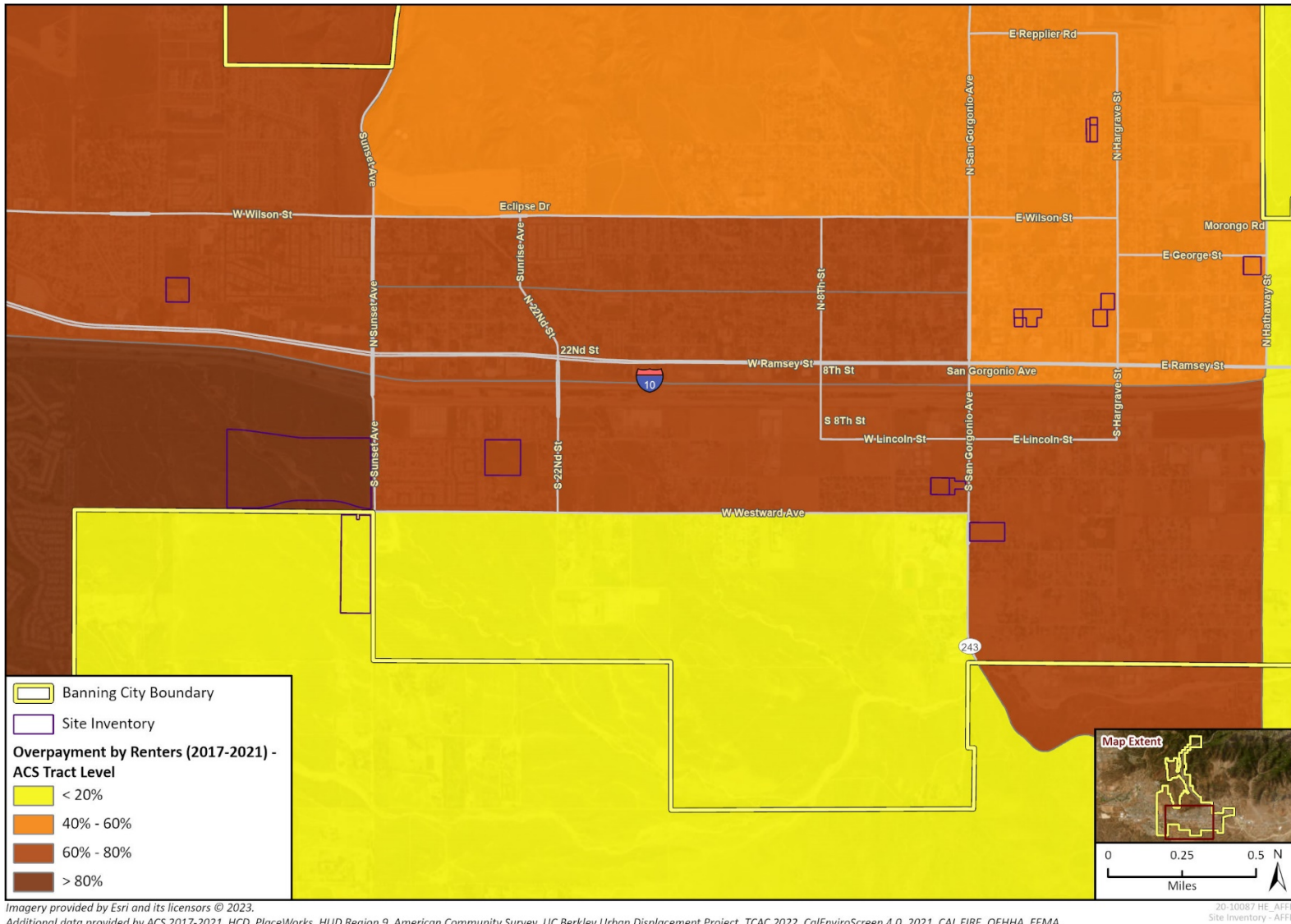
Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

20-10087 HE AFFH  
Site Inventory - AFFH

Source: AFFH Viewer, 2023



**Figure 36 Housing Opportunity Sites by Overpayment by Renters (City of Banning)**



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Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, American Community Survey, UC Berkeley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

Source: AFFH Viewer, 2023

## Sites by Areas of Integration and Segregation

The central areas of the city, including census tracts including 441.02, 441.01, and 442, are the most racially and ethnically diverse, with the highest percentage of non-white residents (between 61 and 80 percent of residents), compared to the northern and southwestern portions of the city where the percentage of non-white residents ranges from less than 20 percent to 60 percent. The area with the lowest percentage of non-white residents is in the southwestern portion of the city (census tract 438.12), with less than 20 percent of residents identifying as non-white. Figure 37 shows the housing opportunity sites by percent of the population comprised of non-white residents.

The majority of the Site Inventory (69 percent of the city's total Site Inventory, or 623 units) is located in areas with a high percentage of non-white residents (between 61 and 80 percent non-white). This includes 285 units appropriate for very low-income households (83 percent of the total very low-income units), 193 units appropriate for low-income households (91 percent of the total low-income units), 128 units for moderate-income households (53 percent of the total moderate-income units) and 17 units for above moderate-income households (15 percent of the total above moderate-income units). Areas that have between 21 and 40 percent non-white residents can accommodate 187 units (21 percent of the total Site Inventory), including 57 units appropriate for very low-income households, 20 units appropriate for low-income households, 65 units available to moderate-income households, and 45 units available to above moderate-income households. There is one housing opportunity site in an area with low levels of non-white residents (less than 20 percent) in the southwestern portion of the city. This site can accommodate 99 units, or 11 percent of the city's total Site Inventory, including 49 moderate income units and 50 above moderate-income units. The Site Inventory will provide additional multi-family housing, increasing economic activity in areas with higher percentages of lower-income, non-white households.

While Banning has no R/ECAPs (per HUD's definition), some tracts with a higher concentration of minorities and LMI populations were found in the central and eastern areas of the city (Census Tracts 441.01 and 442). The majority of lower income sites would not be located in the majority Hispanic census tract. While some lower income sites would be located in the tract with a relatively high concentration of poverty, lower income site locations are spread out across census tracts and are not concentrated in any areas of the city.

## Sites by Communities Vulnerable to Displacement

While most of Banning is at lower risk of displacement, there are several neighborhoods in the central portion of the city that are considered vulnerable to displacement, in the census tracts of 441.01, 441.02, 442, and 443. These neighborhoods also have higher rates of overcrowding, overpayment, and non-white residents. Figure 38 shows the housing opportunity sites in relation to the location of areas that are at risk of displacement. Census tracts with high levels of displacement (dark red) include Census Tracts 441.01 and 442.

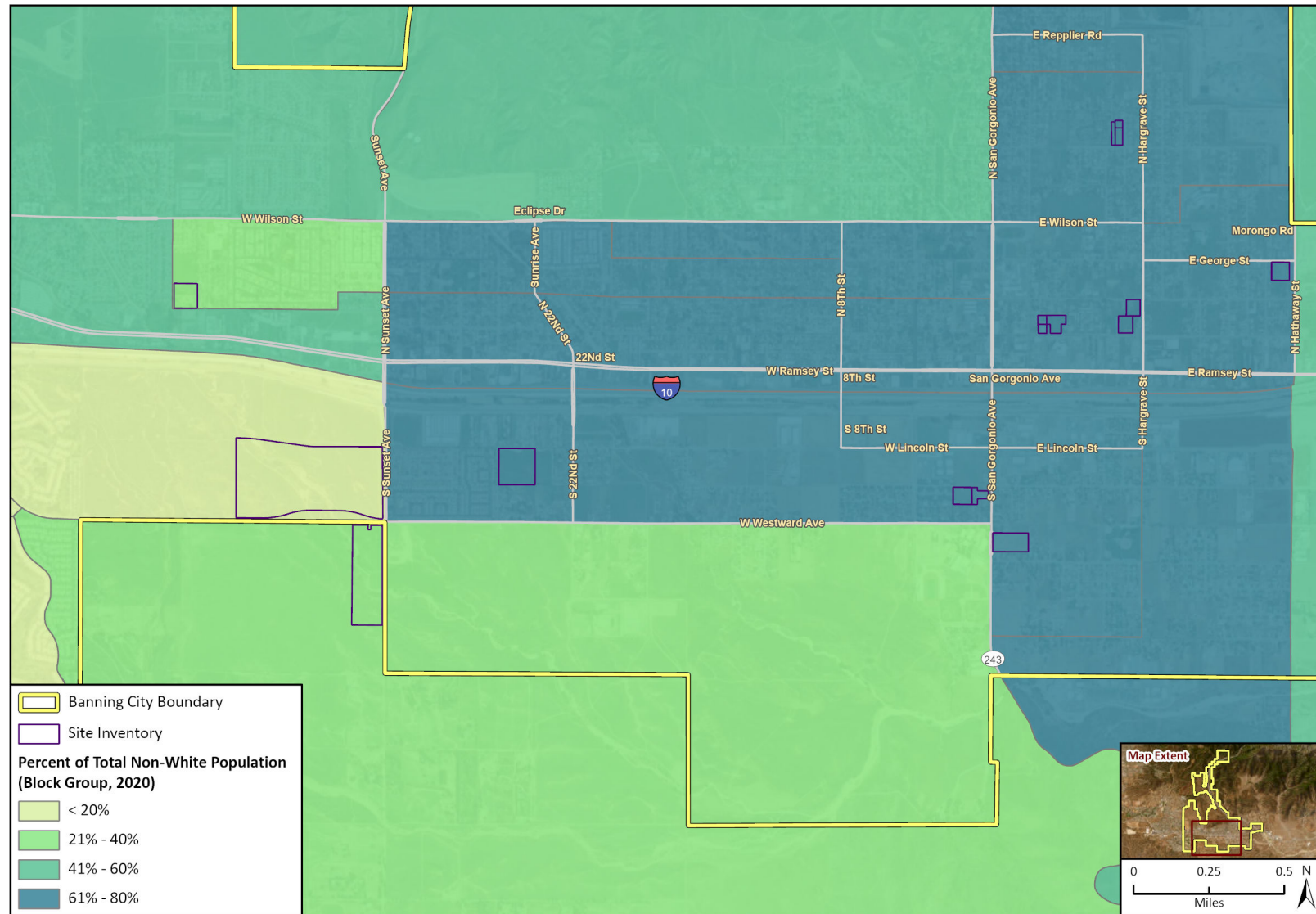
The majority of the housing opportunity sites identified by the Site Inventory are located in areas that are at risk of displacement. Forty-six percent of assumed units the Site Inventory is located in areas considered at risk of displacement, including 205 very low-income units, 152 low-income units, and 61 moderate-income units. An additional 23 percent of the Site Inventory is located in areas with high levels of displacement risk, including 80 very low-income units, 41 low-income units, 67 moderate-income units, and 17 above moderate-income units. Areas with low displacement risk have capacity for

31 percent of the total site inventory, or 286 units, including 57 very low-income units, 20 low-income units, 114 moderate-income units, and 95 above moderate-income units.

Additional units in areas of displacement risk will provide affordable housing options for existing low- and moderate-income residents, allowing residents to remain in their communities, and additional moderate- and above moderate-income units may provide housing mobility options and opportunities for home ownership to increase neighborhood stabilization.



**Figure 37 Housing Opportunity Sites by Total Non-White Population (City of Banning)**



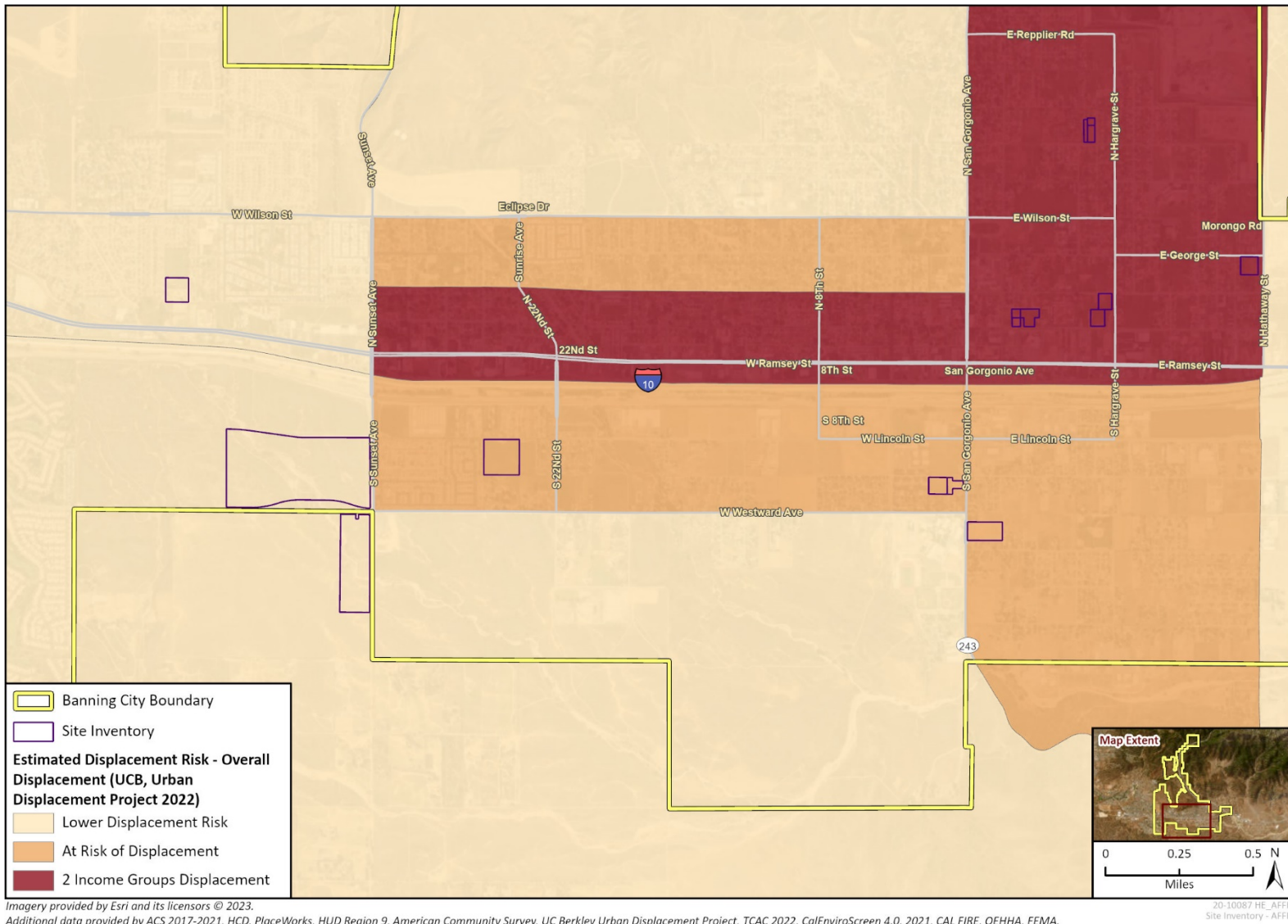
Imagery provided by Esri and its licensors © 2023.

Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

20-10087 HE\_AFFH  
Site Inventory - AFFH

Source: AFFH Viewer, 2023

**Figure 38 Housing Opportunity Sites by Displacement Risk (City of Banning)**



Source: AFFH Viewer, 2023

**Table 14 Sites Inventory by Census Tract Characteristics**

| APN       | Site Intersection  | Sites Inventory Capacity (Units) |                  |                       |                             |                   |                        |                       |                                |                                |                          |
|-----------|--------------------|----------------------------------|------------------|-----------------------|-----------------------------|-------------------|------------------------|-----------------------|--------------------------------|--------------------------------|--------------------------|
|           |                    | Very Low-Income Units            | Low-Income Units | Moderate-Income Units | Above Moderate-Income Units | Percent Non-White | Percent LMI Households | TCAC Opportunity Area | Percent Overpayment by Renters | Percent Overcrowded Households | Displacement Sensitivity |
| 534161010 | N Hermosa St.      | 14                               | 7                | 0                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 534161009 | N Hermosa St.      | 0                                | 0                | 14                    | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 534161008 | N Hermosa St.      | 0                                | 0                | 9                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 537110014 | S Sunset Ave.      | 0                                | 0                | 49                    | 50                          | <20%              | 25-50%                 | Low Resource          | >80%                           | <5%                            | Lower Risk               |
| 537120034 | S Sunset Ave.      | 0                                | 0                | 45                    | 45                          | 21-40%            | 50-75%                 | Low Resource          | <20%                           | <5%                            | Lower Risk               |
| 538250004 | S Woodland Ave.    | 111                              | 85               | 25                    | 0                           | 61-80%            | 50-75%                 | Low Resource          | 60-80%                         | 5-10%                          | At Risk                  |
| 540250014 | S San Geronio Ave. | 20                               | 10               | 0                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 60-80%                         | 5-10%                          | At Risk                  |
| 540250023 | S San Geronio Ave. | 36                               | 18               | 0                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 60-80%                         | 5-10%                          | At Risk                  |
| 541103022 | E Williams St.     | 0                                | 0                | 13                    | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 541094020 | E George St.       | 36                               | 19               | 0                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 541103023 | E Williams St.     | 0                                | 0                | 13                    | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 541103025 | E Williams St.     | 30                               | 15               | 0                     | 0                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 541110009 | E Nicolet St.      | 0                                | 0                | 9                     | 8                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |

City of Banning  
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| APN          | Site Intersection   | Sites Inventory Capacity (Units) |                  |                       |                             |                   |                        |                       |                                |                                |                          |
|--------------|---------------------|----------------------------------|------------------|-----------------------|-----------------------------|-------------------|------------------------|-----------------------|--------------------------------|--------------------------------|--------------------------|
|              |                     | Very Low-Income Units            | Low-Income Units | Moderate-Income Units | Above Moderate-Income Units | Percent Non-White | Percent LMI Households | TCAC Opportunity Area | Percent Overpayment by Renters | Percent Overcrowded Households | Displacement Sensitivity |
| 541110013    | E Williams St.      | 0                                | 0                | 9                     | 9                           | 61-80%            | 50-75%                 | Low Resource          | 40-60%                         | 5-10%                          | High Risk                |
| 543060002    | S San Geronimo Ave. | 38                               | 39               | 36                    | 0                           | 61-80%            | 50-75%                 | Low Resource          | 60-80%                         | 5-10%                          | At Risk                  |
| 537020008    | W Jacinto View Rd.  | 57                               | 20               | 20                    | 0                           | 21-40%            | 50-75%                 | Moderate Resource     | 60-80%                         | <5%                            | Lower Risk               |
| <b>Total</b> |                     | <b>342</b>                       | <b>213</b>       | <b>242</b>            | <b>112</b>                  |                   |                        |                       |                                |                                |                          |

## Fair Housing Priorities and Goals

Table 15 identifies fair housing issues in Banning and suggests meaningful actions to further fair housing in the city.

**Table 15 Fair Housing Issues, Contributing Factors, and Meaningful Actions**

| AFH Identified Fair Housing Issue                               | Contributing Factors   | Meaningful Actions   |
|---|--|--|
| Enhancing fair housing outreach and housing mobility strategies | <ul style="list-style-type: none"> <li>▪ Insufficient and inaccessible outreach and enforcement</li> <li>▪ Lack of public input and feedback on issues and strategies</li> <li>▪ Lack of marketing community meetings</li> <li>▪ Insufficient local public fair housing enforcement and testing</li> </ul> | <ul style="list-style-type: none"> <li>▪ Beginning 2025, provide annual trainings during the 6th Cycle Housing Element planning period to improve capacity of building and code enforcement staff to work with diverse communities, in a culturally competent manner with a focus on problem solving and with connections to social and economic support services. (Program 1)</li> <li>▪ Seek funding to assist local property owners/managers operating rental housing in need of rehabilitation. The goal of this action is to preserve “naturally occurring affordable housing”. Focus of program resources will be advanced using principles to Affirmatively Further Fair Housing. Apply for, or assist with applications for, at least two funding grants during the planning period. (Program 2)</li> <li>▪ Support the ability and knowledge of lower-income residents to apply for Housing Choice Vouchers. (Program 15)</li> <li>▪ Continue to invest in Fair Housing Resources through a contract with Riverside Legal Aide (RLA) to support residents who need Fair Housing resources, mitigation, or legal. (Program 25)</li> <li>▪ Continue to effectively address the requirements of AB 686 by increasing outreach and education through the fair housing service providers, publicize fair housing litigation to encourage reporting, and conduct random testing on a regular basis to identify issues, trends, and problem properties. (Program 25)</li> <li>▪ Once a year beginning in 2024, provide information to residents on the services provided by the Fair Housing Council of Riverside County, such as credit counseling, first-time homebuyer resources, and pre-purchase counseling by including informational pamphlet inserts in the City’s mailed utility billings. Provide the information both in English and Spanish. (Program 25)</li> <li>▪ Work with local agencies such as the Fair Housing Council of Riverside County to help identify and reduce barriers to housing on both a regional and local scale. Continue to provide CDBG funding to the Fair Housing Council. (Program 25)</li> <li>▪ By January 2024, include on the City’s website resources provided by the Fair Housing Council of Riverside County and quick links for easy access to Fair Housing’s website. (Program 25)</li> <li>▪ At least once annually in areas of high segregation and poverty (Census Tracts 441.01 and 44 – central and eastern Banning), coordinate with FHCRC to provide free educational workshops (in-person or online) to tenants and landlords on their rights and responsibilities under Fair Housing laws. Consider translation needs, meeting days/times, and other</li> </ul> |

| AFH Identified Fair Housing Issue  | Contributing Factors   | Meaningful Actions  |
|--|--|---|
|  |  | <p>consideration for attendees. The first workshop shall occur by December 15, 2024. Objective is to have at least ten workshop attendees. (Program 25)</p> <ul style="list-style-type: none"> <li>Conduct bilingual multimedia campaigns for housing related educational events, including social media and printed flyers posted in the common area of large complexes, community centers the Banning Library, laundromats, and other strategic visible strategic locations, prioritizing neighborhoods in Census Tracts 441.01 and 442 (Downtown Banning and East Banning). The first educational event shall occur by December 15, 2024. (Program 25)</li> <li>At least once annually, obtain feedback through workshop surveys, focused discussions, and/or online methods to obtain public input and feedback on fair housing issues. The first instance shall occur on or before December 15, 2023. Objective is to receive feedback from at least 15 participants. (Program 25)</li> <li>Establish a method of measuring the progress of fair housing practices, which can include the index of dissimilarity, the Regional Opportunity Index, and percentage of residents experiencing extreme housing cost burdens. Report the findings of these metrics as part of the City's Housing Element Annual Progress Report by 2026. (Program 26)</li> <li>Expand understanding of the current state of fair housing practices and potential areas of discrimination by conducting an in-depth study of fair housing issues around the city, to be completed by 2026. (Program 26)</li> </ul> |
| Encouraging development of new affordable housing in Areas of High Opportunity | <ul style="list-style-type: none"> <li>Dominance of single-family housing, which is typically more expensive than multi-family</li> <li>Lack of inclusionary housing requirements</li> </ul> | <ul style="list-style-type: none"> <li>By January 2024, change the land use and zoning designations of properties identified as proposed VHDR zone in Appendix B to address any shortfall of sites to accommodate the City's remaining RHNA requirements to create opportunity for at least 510 units of multi-family housing for lower income households. (Program 4)</li> <li>Actively promote, through outreach and discussions, sites available for lower- and moderate-income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations. (Program 5)</li> <li>Amend the Zoning Ordinance by January 2024 to allow, by right, a mix of dwelling types and sizes, specifically missing middle housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) within lower density City residential designations. (Program 5)</li> <li>Incentivize and support multi-family and affordable housing development and rehabilitation (Programs 5, 6, 7, 9, 11, 16, 17, and 29)</li> <li>Monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints, including but not limited to flexibility is building setbacks, increased lot coverage, reduced parking requirement, etc. to enhance the feasibility of affordable housing, while maintaining the quality of housing. (Program 9)</li> </ul>  |

| AFH Identified Fair Housing Issue | Contributing Factors | Meaningful Actions   |
|-----------------------------------|----------------------|--|
|                                   |                      | <ul style="list-style-type: none"> <li>Continue to utilize funds to expand affordable housing projects that target and address special needs populations with the goal of facilitating the development of 80 units affordable to extremely low-income residents over eight years. (Program 16)</li> <li>Update the City's zoning code to be consistent with State Density Bonus Law and promote the density bonus program to developers (Program 17)</li> <li>Encourage innovative housing structures, such as micro-unit housing and new shared and intergenerational housing models to help meet the housing needs of aging adults, students, and lower-income individuals citywide. (Program 19)</li> <li>Monitor lot splits and two-unit developments under SB 9, provide technical assistance to homeowners, and develop or adjust development standards as needed. Provide easily accessible information and resources about SB 9 on the City website by January 2025 as a way to promote affordable housing in higher-resource neighborhoods. (Program 26)</li> <li>Prioritize the high and moderate resource areas east of N. Sunset Avenue when identifying potential sites for Habitat for Humanity builds (Program 26).</li> <li>At least once annually, provide an informational workshop (in-person or online) on accessory dwelling units (ADUs), and target outreach to residents in the high and moderate resource areas east of N. Sunset Avenue. The first workshop shall occur by December 15, 2024. Objective is to have at least five workshop attendees. (Program 28)</li> </ul> |



| AFH Identified Fair Housing Issue  | Contributing Factors   | Meaningful Actions  |
|--|--|---|
| Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing | <ul style="list-style-type: none"> <li>▪ Shortage of subsidized housing units</li> <li>▪ Cost of repairs or rehabilitation</li> <li>▪ Dominance of single-family housing, which is typically more expensive than multi-family</li> <li>▪ Limiting local land use policies</li> </ul> | <ul style="list-style-type: none"> <li>▪ Beginning 2025, provide annual trainings during the 6th Cycle Housing Element planning period to improve capacity of building and code enforcement staff to work with diverse communities, in a culturally competent manner with a focus on problem solving and with connections to social and economic support services. (Program 1)</li> <li>▪ Seek funding to assist local property owners/managers operating rental housing in need of rehabilitation. The goal of this action is to preserve “naturally occurring affordable housing”. Focus of program resources will be advanced using principles to Affirmatively Further Fair Housing. Apply for, or assist with applications for, at least two funding grants during the planning period. (Program 2)</li> <li>▪ Prioritize investments in public facility and infrastructure projects that improve the quality of life for residents in Downtown Banning and the neighborhood east of N. San Geronio Avenue and north of I-10, with input from community members and stakeholders. Apply for at least two grants for public works improvements in these neighborhoods during the planning period. (Program 3)</li> <li>▪ Coordinate public improvements in areas where residential development is anticipated to facilitate revitalization, such as neighborhoods north of W. Ramsey Street and in neighborhoods with sites that will be rezoned to VHDR. (Program 4)</li> <li>▪ Apply for a minimum of 3 funding applications to support placemaking activities and/or infrastructure improvements in central, southern, and eastern Banning during the planning period. (Program 18)</li> <li>▪ Assist 20 extremely low, very low, and low-income homeowners with small home loans for establishing energy efficiency measures and executing rehabilitation repairs by the end of the planning period. (Program 20)</li> <li>▪ Assist at least 8 extremely low, very low, and low-income homeowners with larger home loans for establishing energy efficiency measures and executing rehabilitation repairs by the end of the planning period. (Program 21)</li> <li>▪ Connect neighborhoods of all income levels and demographic makeup through small placemaking projects and activities accessible to all persons, including persons with disabilities. Complete at least three placemaking activities in eastern, southern, or central Banning by the end of 2028. (Program 24)</li> <li>▪ Expand public outreach to target all neighborhoods and educate people from all types of community groups on new and upcoming neighborhood projects and activities. Engage at least one new neighborhood-based group from the neighborhoods of eastern, central, or southern Banning in neighborhood projects or activities by 2028. (Program 24)</li> <li>▪ Annually examine the need for infrastructure and secure funding for 3 improvement projects over the planning period within the CDBG target area of central and eastern Banning that improves the amenities in neighborhood parks and sidewalk conditions to enhance the</li> </ul> |

| AFH Identified Fair Housing Issue               | Contributing Factors  | Meaningful Actions  |
|---|---|---|
|   |   | <p>quality of life of residents in the LMI designated neighborhoods which is where the majority of housing opportunities will be with implementation of the rezone program. (Program 24)</p> <ul style="list-style-type: none"> <li>▪ Prioritize housing capacity, housing and infrastructure resources and investments, policies, and incentives for market rate and affordable housing development in eastern, central, and southern Banning, and annually monitor progress. (Program 26)</li> <li>▪ In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development. (Program 27)</li> <li>▪ Contact commercial developers and discuss opportunities for the development of a grocery store in East Banning by January 2025. Prepare market analysis to support grocery store development by January 2026 (Program 24).</li> </ul> |
| Protecting existing residents from displacement | <ul style="list-style-type: none"> <li>▪ Lack of information about homeownership assistance programs and homeownership support</li> </ul> | <ul style="list-style-type: none"> <li>▪ Utilize DAP funding to provide assistance to 40 very-low and low-income households during the planning period. (Program 13)</li> <li>▪ Annually conduct a multimedia campaign (i.e., social media) to encourage residents to learn about the DAP. The first campaign is to be completed by the end of December 2023. (Program 13)</li> <li>▪ Provide information regarding the Mortgage Credit Certificate (MCC) Program to eligible home buyers. (Program 14)</li> <li>▪ Coordinate proactively with Riverside County on annual monitoring of the effectiveness of the MCC program. (Program 14)</li> <li>▪ Annually conduct a multimedia campaign (i.e., social media) to encourage residents to learn about the MCC Program. The first campaign is to be completed by the end of December 2025. (Program 14)</li> </ul>   |

No policies or programs in the Housing Element have been identified as barriers to fair housing practices in Banning. In addition to federal fair housing laws, existing City policies and programs are already in place to increase affordable housing options, as well as ensure the provision of housing to many different population groups, including persons living with disability, large families, farmworkers, and persons who would benefit from supportive and/or transitional housing. The implementation of identified programs would further existing fair housing practices by expanding outreach strategies to include populations that live on lower household incomes and/or those who would be more receptive through Spanish language communication.

Additionally, while the County of Riverside AI lists several impediments to fair housing in Banning, the City is working separately to address impediments, and will address the remainder through implementing programs of this Housing Element. As for the regional impediments noted in the County of Riverside AI, AFFH programs in this Housing Element will work to increase fair housing practices such as outreach and education through social media and providing resources such as fair housing counseling and mediation, including targeting populations that have historically had fewer housing choices; promote equitable employment, and continue existing work with the FHCRC.