

City of Banning

Housing Element

2021-2029

City of Banning
99 East Ramsey Street
Banning, California 92220

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1 Introduction

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:

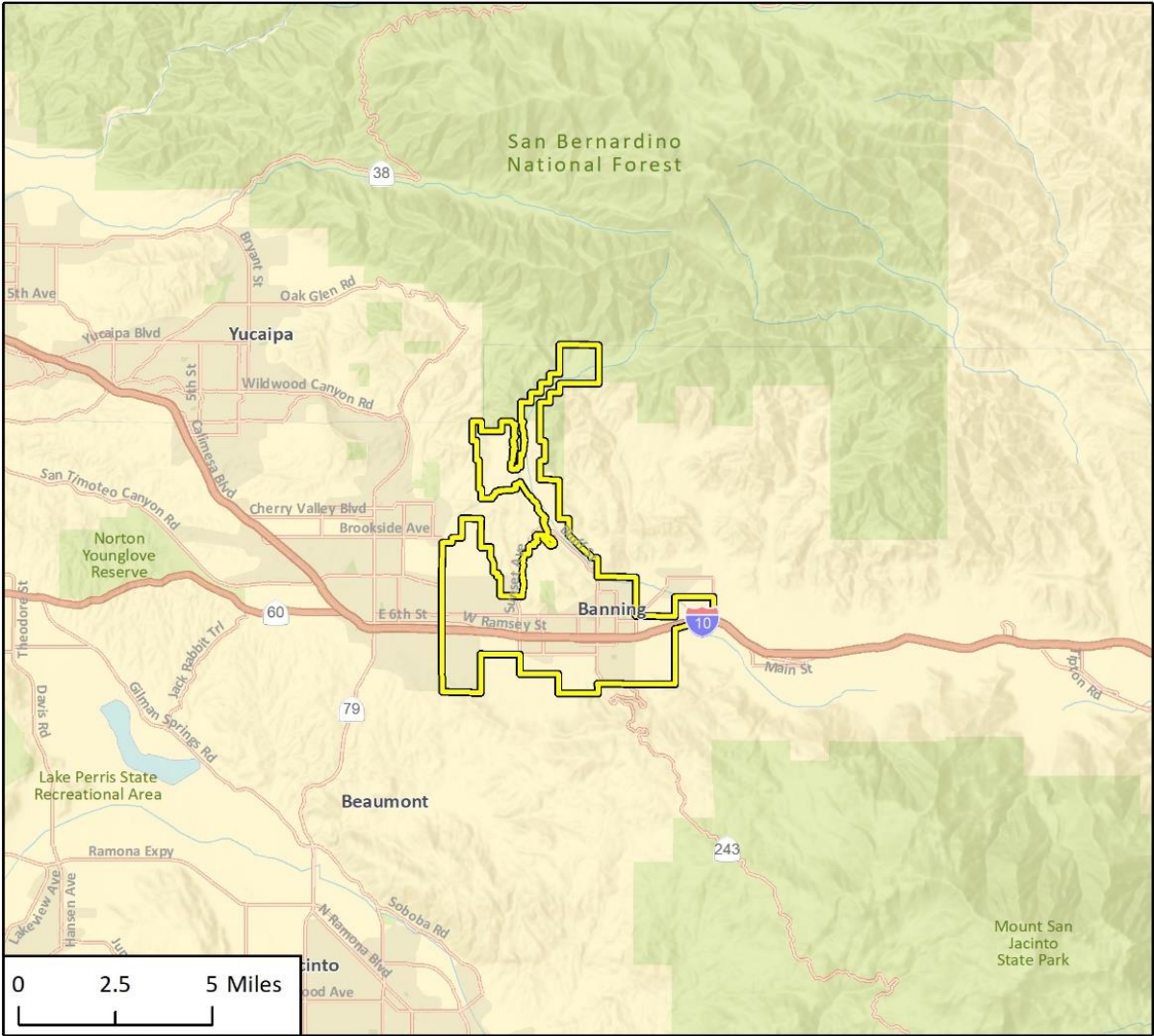
- To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
- To provide a strategy that establishes housing goals, policies, and programs.

This Housing Element represents the City of Banning’s 6th 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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 City of Banning Boundary

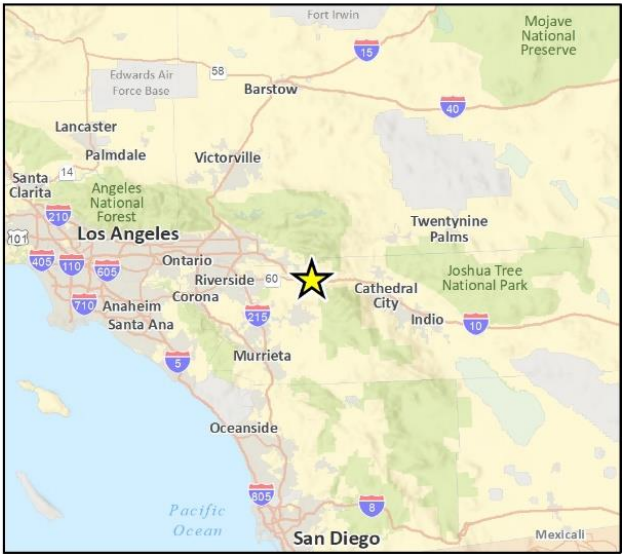


Fig. 2 Regional Location

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 circulated-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 on July 14, 2021 and again from October 5 through October 25. The document was posted on the City's website and was promoted via social media.

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.

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%
Total Population	30,281	100.0%	31,072	100.0%	
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
Total	30,281	100.0%	31,072	100.0%	

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%
Total Employed Population	9,761	100.0%

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

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 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 ¹	288,943	72,436	272,835	46,632	N/A	N/A

N/A = not available

¹ 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.

Data on overcrowding by tenure is unavailable at the city level for Banning. According to the 2019 ACS, approximately 44 percent of overcrowded households in Riverside County are owner-occupied households and approximately 56 percent are renter-occupied.

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.

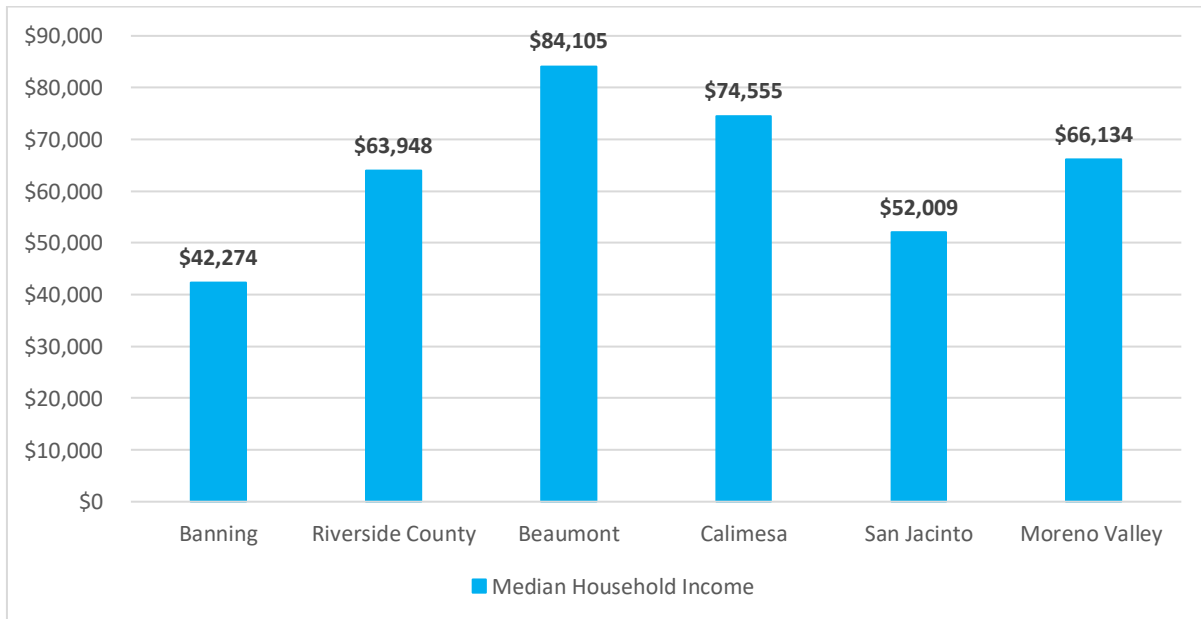
Table 8 Households by Income Category

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.

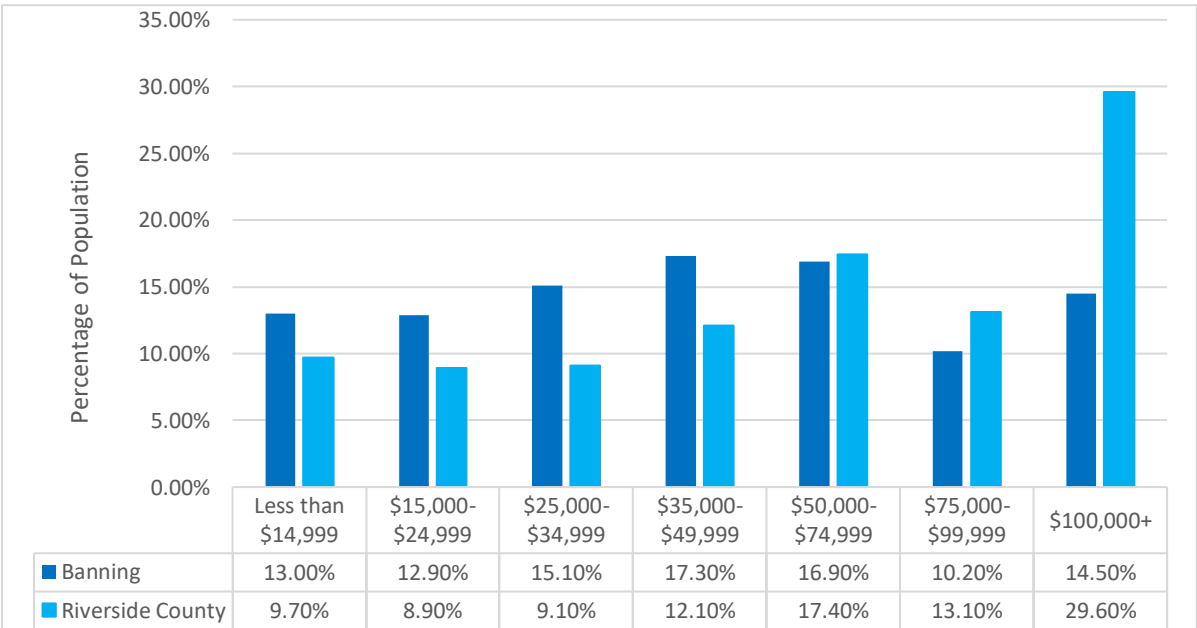
Figure 2 Median Household Income



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 ¹	Percent of Total Households ²
Persons with Disabilities	5,704 Persons	19.0	–
Elderly Households ³	5,305 Households	–	48.7
Female-Headed Households	1,498 Households	–	13.8
Large Households ⁴	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 ⁵	55 Persons	1.8	–
Unsheltered Persons	43 Persons	1.3	–

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

¹ Population estimate of 31,125.

² 10,885 total households.

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

⁴ Five or more members under one household.

⁵ 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			Total
	Age 5 to 17	Age 18 to 64	Age 65+	
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).

According to SCAG, it is estimated that 55 City residents were considered farmworkers (employed in farming, fishing, and forestry occupations). 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.¹ 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 2020 point-in-time count showed 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.² 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 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

¹ USDA 2017: https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1_Chapter_2_County_Level/California/

² <https://www.desertsun.com/story/news/2020/05/06/riverside-county-point-time-survey-finds-increase-homeless-youth/5180757002/>

- 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 institution-alized; 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 an estimated 43 unsheltered persons in the City of Banning, approximately 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, Calimesa, and San Jacinto.

Table 14 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

Note: Only unsheltered persons were included in the available data by city. The number of persons residing in shelters was unavailable.

Source: Riverside County Homeless Point in Time (PIT) Count, 2020 (<http://rchi.cs.ucr.edu/CityBreakdown>)

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 in 2021. 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) American Red Cross Catholic Charities
Persons With AIDS/HIV	Inland AIDS Project (Eastern County) 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 an 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 ¹	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%

¹City 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 According to 2015-2019 ACS reported, the homeowner and renter vacancy rates in Banning was of 0.9 percent and the renter vacancy rate was 3.4 percent, respectively.](#)

Table 17 Housing Unit Type

Housing Unit Type ¹	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%
Total	9,761	100.0%	12,144	100.0%	12,156	100.0%	24.4%	0.1%
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%
Total Occupied	10,554	100.0%	11,739	100.0%	10,885	100.0%	11.2%	-7.3%
Vacancy Rate	–	8.6%	–	8.4%	–	8.8%	-0.2%	0.4%

¹ 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%

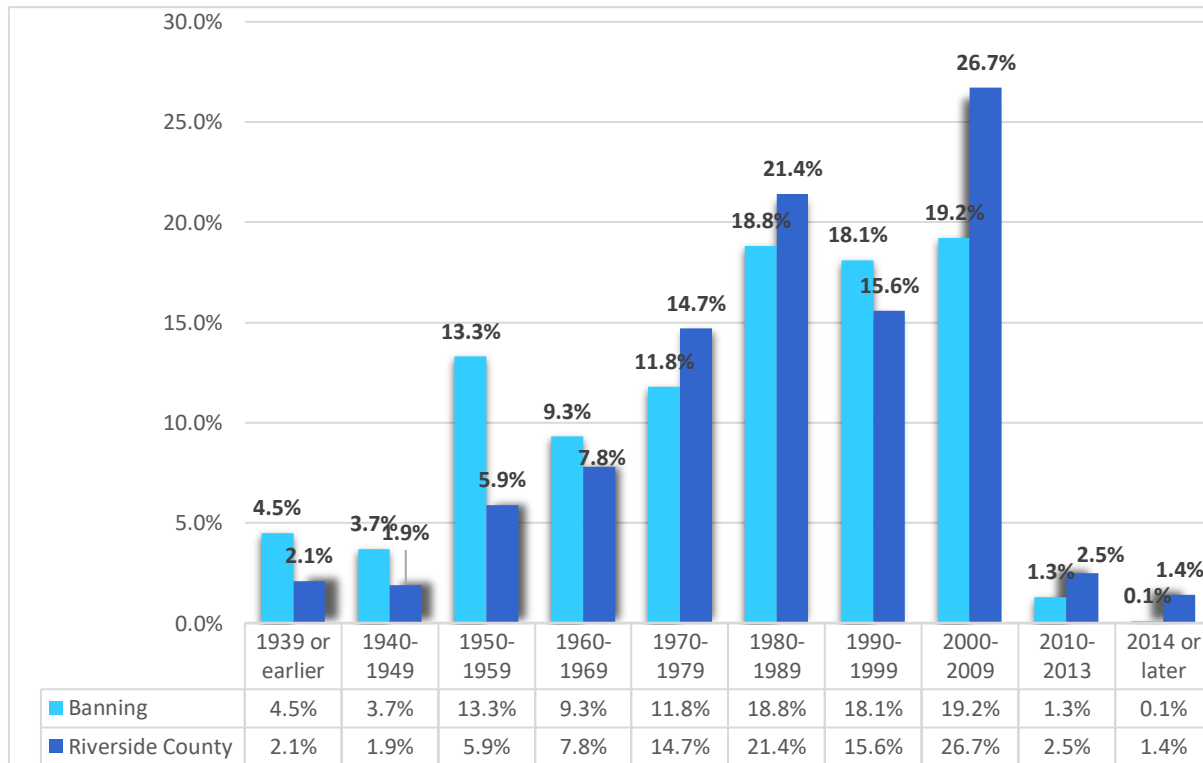
Source: American Community Survey, 2015-2019.

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.

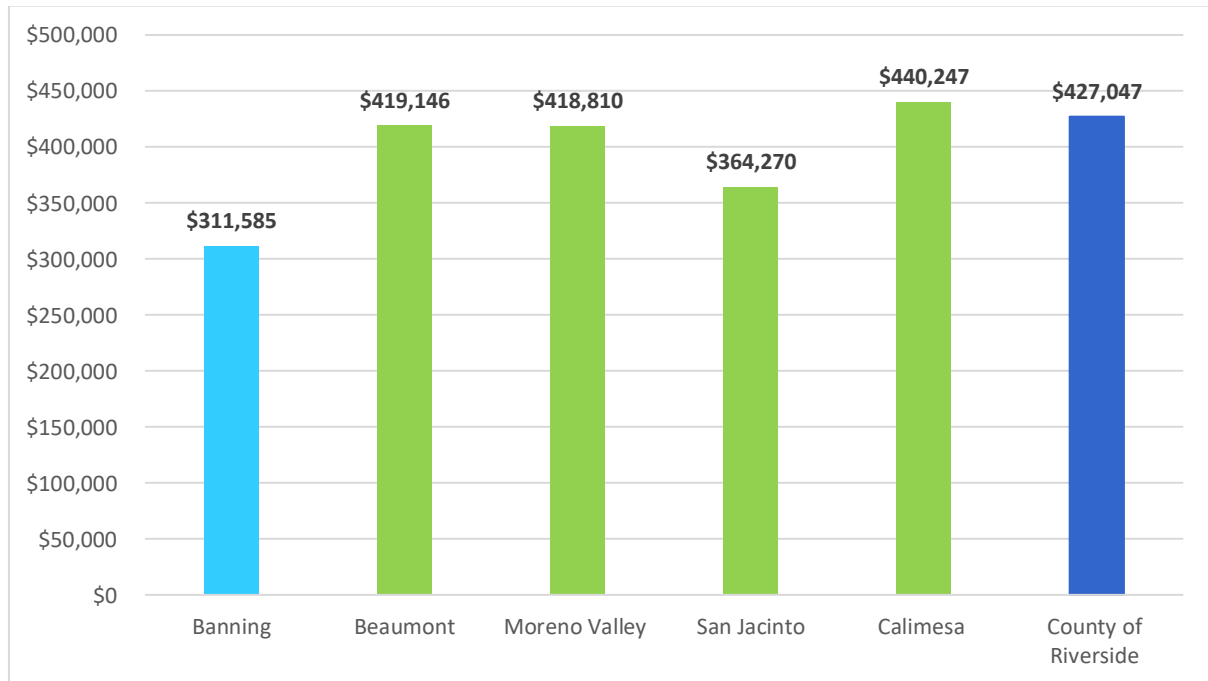
Housing Costs

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 ¹	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. ¹Median 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 Income Limits	Affordable Payment	Housing Costs		Affordable Price	
			Utilities	Taxes/Insurance (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
Extremely low-income (0-30% AMI)	980	785	1,765
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%
Very low-income (31-50% AMI)	840	975	1,815
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%
Low-income (51-80% AMI)	825	1,550	2,375
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%
Moderate and above income (>80% AMI)	1,290	3,610	4,900
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%
Total households	3,935	6,925	10,860
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
Total		237	0	234	–	0	234	–	–

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

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 years¹. 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.³ 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.⁴ 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.⁵](#)

³ https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages_riverside.htm

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

⁵ 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, 68-81 percent of the maximum density was achieved for the 10-6 projects that are going 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 affordability covenants, 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.⁶ 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 (%)
Home Purchase				
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)
Refinancing				
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.**

⁶ 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)

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, HDR-20(AHO), 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 1-bedroom: 1 covered space; 1 guest space for every 4 units 2-bedroom: 2 covered spaces, 1 guest space for every 4 units 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 6 du/ac	Variable
Medium Density Residential	12	10	10	35	6.1 du/ac 12 du/ac	Variable
Medium-High Density Residential	10	10	10	45	12.1 du/ac 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 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 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. **Program 14, the Zoning Ordinance Monitoring Program, will be implemented to amend the City's zoning code to comply with the most recent ADU legislation.**

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 is in compliance with California Health and Safety Code Section 17021.6.~~ 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 914**, 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. **Minimum-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 use 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.

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. **Although the Zoning Ordinance does not provide a definition for supportive housing, one can infer that the use is characterized as a small, licensed residential care facility. Given the City's definition as a small residential care facility, transitional housing is permitted in all residential zones.**

The City is currently not in compliance with AB 2162 and will amend its Zoning Ordinance under **Program 913** to address new provisions in regards 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 **HomesFacility**" 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 **homes-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 **homes-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 914 will continue to monitor the most recent housing legislature regarding residential care facilities to remain compliant.

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 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.

g- 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.

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 33 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 33 Development and Planning Fees

Development Process	Related Fee
Planning and Zoning	
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
Subdivisions	
Tentative Subdivision Map	\$8,985.00 - \$9,983.00 depending on number of lots
Tentative Parcel Map	\$8,253.00
Design Review	\$5,881
Environmental Review	
Environmental Assessment (City Facilitation of Consultant)	\$8,209.00
Environmental Mitigation/Monitoring	\$5,000.00
Development Impact Fees	
Fire Protection Fee	
Single-Family	\$746 per unit
Multi-Family	\$610 per unit
Police Facilities	
Single-Family	\$1,200 per unit
Multi-Family	\$982 per unit
Park Fee	
Single-Family	\$3,840 per unit
Multi-Family	\$3,142 per unit
General Facilities Fee	
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 2019 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. In accordance with new transparency requirements, the City of Banning has posted all zoning, development standards 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:

- a. The proposed project is consistent with the General Plan.
- b. The proposed project is consistent with the Zoning Ordinance, including the development standards and guidelines for the district in which it is located.
- c. 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.
- d. 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. Furthermore, this program will review design and layout of proposed projects to reduce hazards and additional impediments on surrounding development and neighborhood characteristics.

The provision of required on and off site improvements to implement the purpose and intent of this ordinance and the City’s design and development standards. The City does not have a separate design review board for residential development. An applicant must submit an early design review application form to be reviewed before the city’s planning commission prior to formal submittal of a project to the City.

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 1247** 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.

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 Gorgonio 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 each that 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 6th Cycle planning period is a total of 1,673 new units. This allocation is distributed into five income categories, as shown below in Table 34. 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 34 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%
Total	1,673	100.00%

* 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 35 shows the remaining unit deficit after subtracting units that are pending or approved as of June 30, 2021.

Table 35 Remaining 2021-2029 Share of Regional Housing Needs

Income/Affordability Category	RHNA	Units Pending or Approved	Remaining Units Deficit
Lower	510	0	510
Moderate	280	32	248
Above Moderate	883	1,384	0
Total	1,673	1,416	758

As of June 30, 2021, 1,416 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 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. Planned and approved projects achieve an average of 80 percent of their maximum allowable density. Figure 6 shows the locations of the planned or approved projects that have been credited towards meeting the City's RHNA. The locations of these projects are symbolized with corresponding Map ID numbers on Table 36.

Table 36 Planned or Approved Units (2021)

Map ID	Project Name	Zoning	Acreage	Max. Units Allowed	Units Achieved	Percent of Max. Density	Income Category	Specific Plan	Project Status
1	TTM 37388	LDR, MDR	119.97	559	287	51%	Above Moderate	Butterfield	Entitled/no permits issued
2	TTM 37389	LDR, MDR	152.48	760	616	81%	Above Moderate	Butterfield	Permits issued
3	Vista Serena	HDR	2.00	36	32	89%	Moderate	Butterfield	Entitled/no permits issued
4	TTM 37766	LDR	14.16	70	80	114%	Above Moderate	Rancho San Gorgonio	Entitled/no permits issued
5	TTM 36710	LDR	10.60	53	39	74%	Above Moderate		Entitled/no permits issued
6	TTM 37390	LDR, MDR	93.00	465	362	78%	Above Moderate	Butterfield	Permits issued

Source: City of Banning 2021

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. 32 moderate income units and 1,262 above moderate-income units are currently planned within the Butterfield Specific Plan, 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 36 and project locations are shown geographically on Figure 6. These units count as credits to the City's RHNA allocation. No additional vacant or nonvacant 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 monументation, 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.

Figure 6 Planned or Approved Projects



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4.4 Remaining RHNA

After accounting for units planned and approved, there is a remaining need of 758 units, which includes 510 lower income and 248 moderate 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 vacant and nonvacant properties within the City. Nonvacant parcels were chosen as sites likely to be redeveloped during the next eight years based on the parcel's Improvement-to-Land Value ratio of less than 1.0 (i.e. improvements on site are worth less than the value of the land), the parcel's existing use vs. zoned use, age of structure, floor area ratio, and ownership patterns (i.e. if contiguous parcels have one owner, they are more likely to be consolidated and redeveloped). The parcels were reviewed to eliminate those unlikely to be redeveloped in the near term, such as parcels containing medium to larger size apartment buildings or condominiums and parcels with newer structures.

The average density of planned and approved projects is approximately 80 percent of the maximum allowable density (Table 36). The City used conservative assumptions to estimate the development capacity of each site. Specifically, the sites inventory assumed 75 percent of the maximum allowable density of most parcels, instead of the full development potential. This assumption is based on historical development patterns and is necessary to accommodate for a variety of site-specific factors such as previous development applications submitted for the site, conversations with landowners, development standards and requirements of the corresponding specific plan, and site-specific environmental constraints such as topography, seismic activity, flooding, and wildfire. For the smaller lots in the inventory, a minimum of one dwelling unit is assumed for each legal lot.

A total of 775 residential units can be accommodated on the vacant and nonvacant sites under existing land use policies and approved plans, as shown on

Figure 7 and Figure 8. None of these sites qualify as feasible for facilitating the development of very low- and low-income units because they do not meet the minimum required density for lower income units (30 du/ac). Vacant units identified in Appendix B have current land uses of Rural Residential (RR), Very Low Density Residential (VLDR), Low Density Residential (LDR), Moderate Density Residential (MDR), and High Density Residential (HDR). Nonvacant units were identified on sites designated for HDR that are used for single-family residential and commercial development. Single-family residences on these HDR sites were generally built between 1920 and 1950, while the commercial uses typically have floor area ratios below 50 percent. Additionally, many of these sites currently have structures worth less value than the land that they are on, which increases their redevelopment potential. The year that the existing structure was built and the improvement value to land value are included in the Sites Inventory in Appendix B. Each nonvacant site could be redeveloped into one or more structures that contain a total of at least three housing units or be consolidated to facilitate larger moderate-income projects. Program 6 encourages infill development and lot consolidation, with a focus on nonvacant sites, to allow for more flexibility in possible land uses, building designs, and site and parking lot layouts.

In addition to vacant and nonvacant parcels, the City has identified a number of parcels with potential to be rezoned to accommodate densities that could support lower-income housing units. The LDR zone allows up to 5 du/ac and the MDR zone allows up to 10 du/ac. The Very High Density Residential (VHDR) land use and zoning designation was approved by the City, but the City will adopt development standards for this zoning designation by 2023. Rezoning currently low or medium density residential parcels to a new zoning designation of Very High Density Residential (VHDR) that would allow for 30 du/ac, could accommodate an additional 600 lower-income units. The Housing Element will rezone within three years of the beginning of the planning period to allow residential use by right at specified densities for housing developments in which at least 20 percent of the units are affordable to lower income households. Figure 9 identifies these parcels that could potentially be rezoned in the City. A more detailed sites inventory of the residential capacity can be found in Appendix B.

Appendix B of the Housing Element identifies seven parcels to be rezoned from Low Density Residential (LDR) to VHDR, and two parcels to be rezoned from Medium Density Residential (MDR) to VHDR to accommodate the Regional Housing Needs Assessment (RHNA) for the Housing Element 6th Cycle. Under existing zoning, these nine parcels could accommodate a maximum of 155 dwelling units. However, due to requirements of development, such as ingress and egress, parking, landscaping, and other potential physical constraints to development, it is unlikely that each parcel would accommodate the maximum number of units. As a result, a conservative estimate of 75 percent of the maximum capacity is considered a reasonable target for the number of units feasible for each parcel. Using this assumption, the nine parcels are likely to yield a target of approximately 108 dwelling units at buildout.

As indicated in Appendix B, the sites recommended for rezone would accommodate 299 new Very Low-Income (VLI) households, and 301 new ELI households. The actual number of units constructed could be higher depending on site conditions and development criteria adopted for the new VHDR zone which may include a higher percentage of lot coverage and height increases.

Additionally, of the nine sites proposed for rezone, six of the sites, once rezoned, would likely be exempt from review under CEQA pursuant to Article 12.5 of the 2021 California Environmental Quality Act & CEQA Guidelines as they are less than 4 acres in size and would be used for affordable housing projects. The CEQA exemption would remove a regulatory constraint, expediting project review and processing. Of the remaining three sites, two are less than five acres in size and may

qualify as exempt from review under CEQA pursuant to Section 15332, Class 32 Categorical Exemption for Infill Development Projects. The last remaining site is approximately 9.25 acres in size and will require review under CEQA. A low-income housing development on this site would yield an anticipated 208 VLI or ELI households.

Figure 7 Vacant Residential Parcels

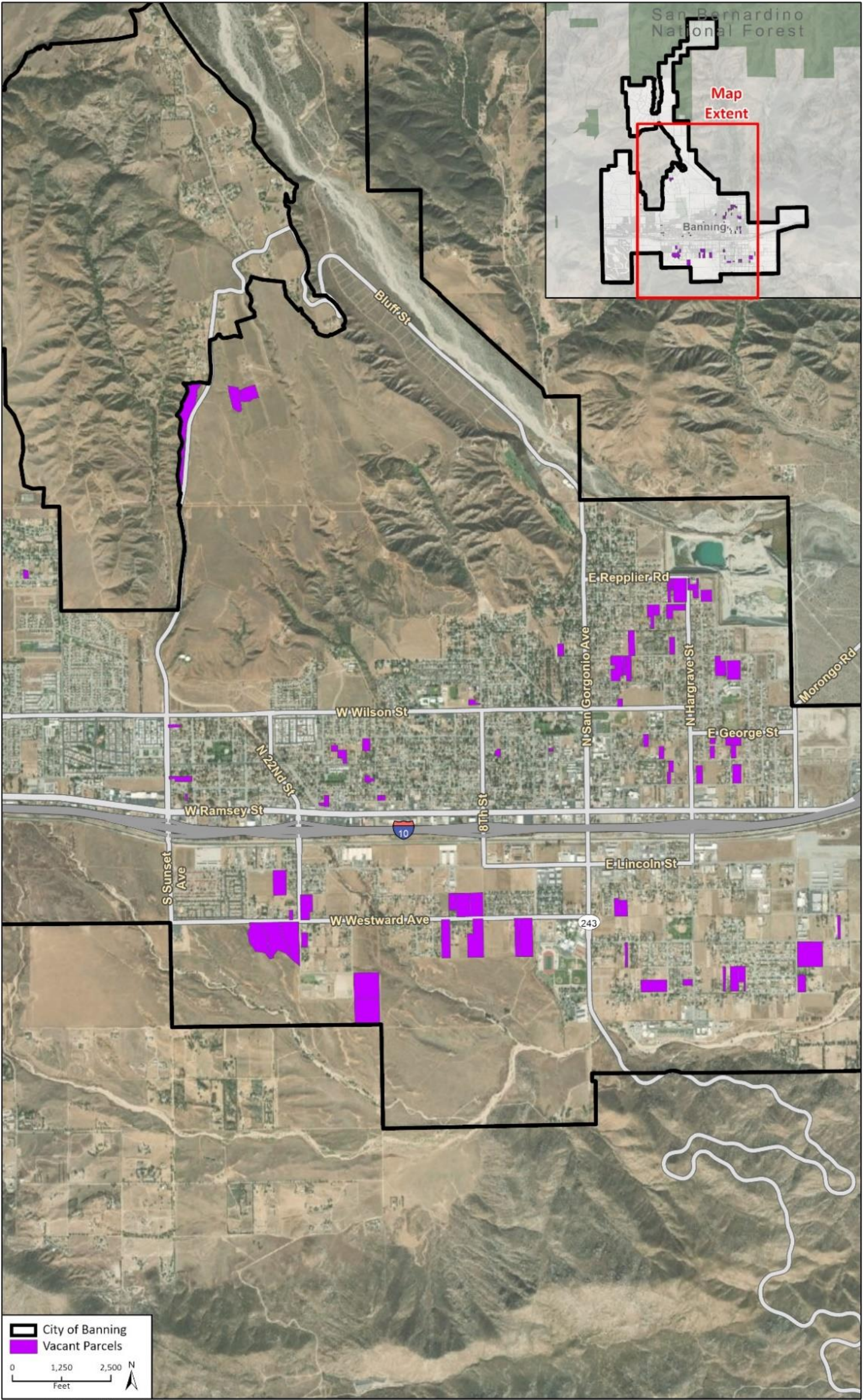


Figure 8 Nonvacant Residential Parcels

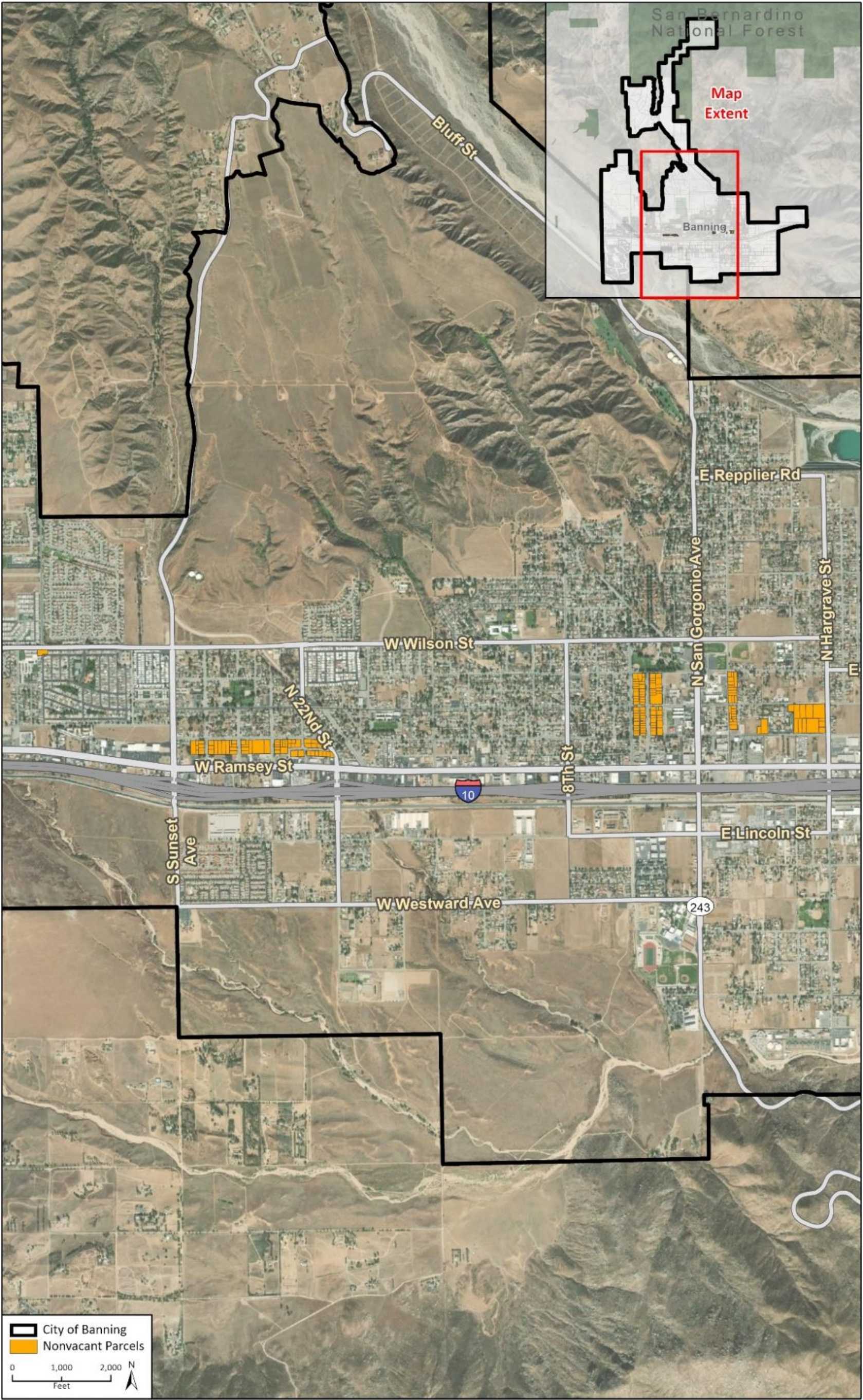
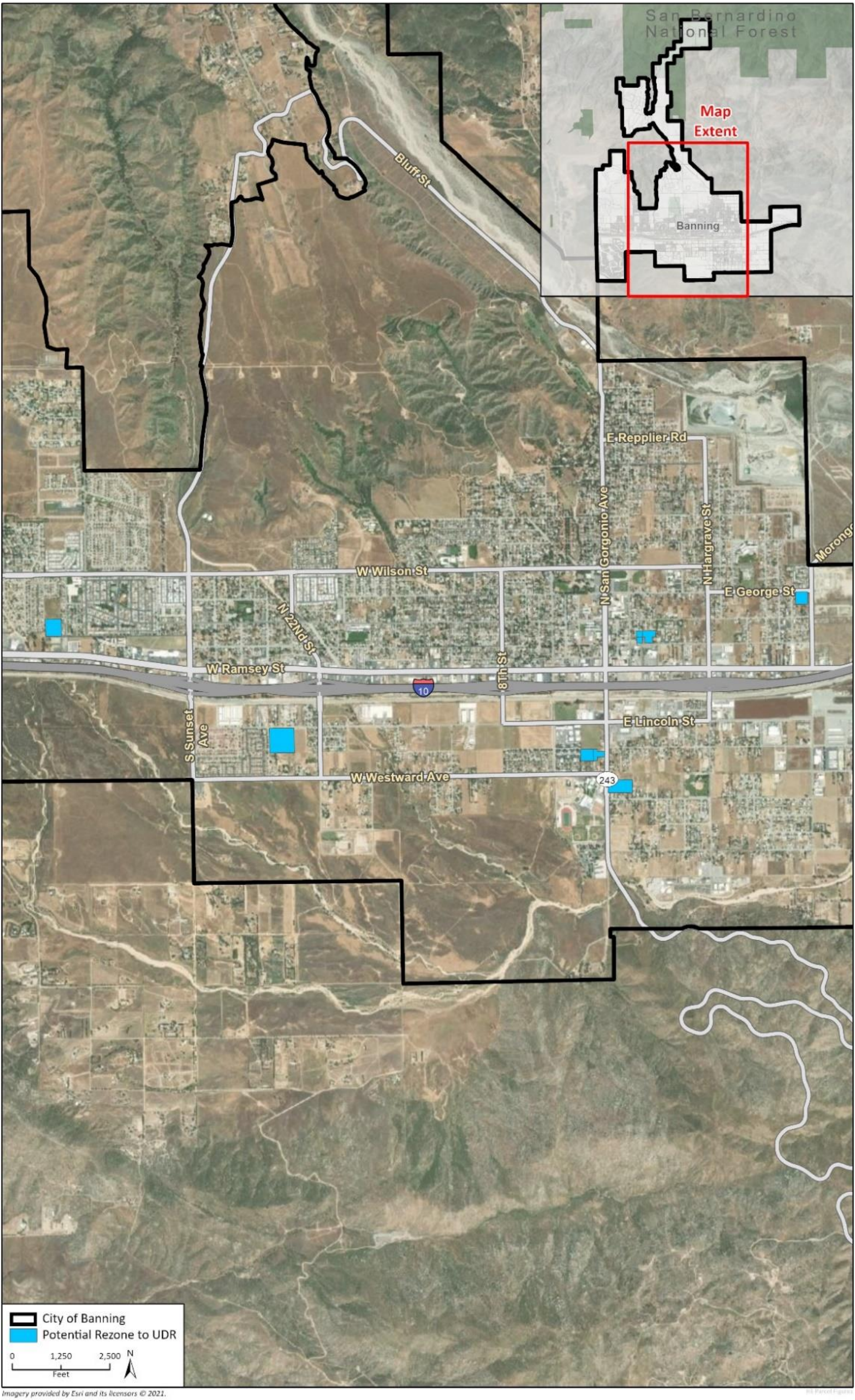


Figure 9 Potential Rezone to Very High Density Residential



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In searching for appropriate sites to rezone to VHDR, the City considered multiple criteria and discovered that each parcel identified in Appendix B-2 shared the following attributes:

- 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, nonvacant, and rezoned sites by income category is located in Table 38.

The City will also introduce a new General Plan land use category that will be introduced after October 2021. This new category would 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 Recycling Trends

The City does not have examples of current recycling trends that show past redevelopment and consolidation of nonvacant sites. Chapter 6 provides a detail of programs that would encourage and facilitate redevelopment and lot consolidation. Therefore, redevelopment projects in neighboring City of Moreno Valley were reviewed. Recent developments in Moreno Valley, located approximately 20 miles west of Banning, have involved the recycling of underutilized and non-performing commercial and residential uses and the consolidation of existing small lots. The following recent projects demonstrate the ability to achieve higher density residential development on previously underutilized parcels.

Recycling activities on sites zoned for mixed-use. Development trends in the City indicate that the vast majority of mixed-use zoned projects include a residential component with a marginal representation or square footage being devoted to commercial use, and none of the mixed-use zoned projects that have been proposed are 100 percent devoted to non-residential purposes. Therefore, it can also be reasonably assumed that residential development would continue to occur on underutilized sites.

To support recycling of underutilized sites with small lots consolidation, the City of Banning will develop a lot consolidation program (Program 6) that will facilitate continued development of residential projects throughout the identified sites in Appendix B.

4.6 Adequacy of Residential Sites Inventory in Meeting RHNA

Vacant, nonvacant, and rezone sites located outside of the Specific Plan areas are listed in Appendix B. The residential development capacity of these sites is summarized in Table 37 below.

Table 37 Residential Capacity in Banning

	Acres	Realistic Unit Capacity
Vacant	188.29	449
Nonvacant	34.72	326
Rezone	30.02	671
Total	253.03	1,446

Overall, vacant and nonvacant parcels in Banning can accommodate approximately 775 new housing units and rezoned parcels can accommodate an additional 600 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
RHNA Allocation	510	280	883	1,673
Planned and Approved Units	0	32	1,384	1,416
ADUs	0	0	0	0
Remaining RHNA After Credits	510	248	0	758
Vacant Units	0	42	407	449
Nonvacant Units	0	326	0	326
Potential Rezone to VHDR	600	0	0	600
Total Units After Credits	600	368	407	1,375
Total Unit Surplus	90	120	908	1,118

4.7 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.

4.8 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.

4.9 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

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. However, the City has made considerable progress related to housing programs and policies. The City has helped develop three assisted housing developments with a total of 237 units serving low-income residents (see Table 25). 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.

Table 39 Quantified Housing Objectives (2013-2021)

	New Construction		Rehabilitation		Conservation/ 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 ¹	1,642	10764	0	0	0	0
Total	3,792	10764	0	0	0	0

¹ 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
Goal #1: Conserving and Improving Existing Affordable Housing			
1	Code Enforcement	To decrease the number of unresolved code violations within the City and increase the number of improved properties.	<p>Implementation: 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>Continued Appropriateness: 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.)</p>

Program	Program Name	Objectives	Progress and Continued Appropriateness
2	Housing Rehabilitation Program	To reduce the number of substandard properties.	<p>Implementation: 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>Continued Appropriateness: 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.</p>
3	Conservation of Existing and Future Affordable Units	To monitor the status of assisted projects.	<p>Implementation: 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>Continued Appropriateness: Banning has several assisted affordable housing developments, although none is 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.</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>Implementation: 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>Continued Appropriateness: 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.</p>

Program	Program Name	Objectives	Progress and Continued Appropriateness
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>Implementation: The time frame on this program is continuous throughout the planning period. The City has met the requirement for the 5th Cycle (2013-2021 adopted Housing Element)</p> <p>Continued Appropriateness: The City will work with developer, 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.</p>
6	Facilitate Development of Affordable and Special Needs Housing	<p>Facilitate affordable housing development commensurate with the RHNA and the production of accessible and supportive housing for persons with disabilities.</p>	<p>Implementation: 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>Continued Appropriateness: In order 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"> ▪ Provide administrative assistance to developers seeking available state and federal funding and/or tax credits for the construction of low-and moderate-income housing. ▪ Facilitate projects that incorporate affordable units and accessible units by granting modifications to development standards, expedited processing, or financial incentives consistent with state law. ▪ Affordable housing developers will be contacted each year to solicit interest and apprise them of available assistance programs. ▪ Targeted assistance will be prioritized for special needs housing and extremely-lo-income (ELI) units through density bonuses and/or regulatory incentives, modified development standards and fee deferrals, when feasible. ▪ 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. • Clarify development standards in

Program	Program Name	Objectives	Progress and Continued Appropriateness
			<p>the VHDR zone as necessary to facilitate affordable housing development.</p> <ul style="list-style-type: none"> 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.
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>Implementation: 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>Continued Appropriateness: 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 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>

Program	Program Name	Objectives	Progress and Continued Appropriateness
8	Mortgage Credit Certificate Program	Provide information regarding the MCC Program to eligible homebuyers.	<p>Implementation Status: 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>Continued Appropriateness: 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 provide referral information regarding the MCC program. On the city website, at City Hall and other public locations.</p>
9	Fair Housing Services	Continue to work with the County of Riverside to provide fair housing services to residents of Banning.	<p>Implementation: 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>Continued Appropriateness: 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>
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>Implementation: The time frame on this program is continuous throughout the planning period. The status of the program implementation is ongoing.</p> <p>Continued Appropriateness: 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>

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>Implementation: 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 & Trade compliance obligation for importing "dirty" electricity. However, the Utility will still receive its allotment of Cap & 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>Continued Appropriateness: 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> <ul style="list-style-type: none"> a. 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. b. 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. c. 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. d. Encourage energy conservation devices including but not limited to lighting, water heater treatments, solar energy systems for all residential projects

6 Housing Plan

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.)

Funding:	Community Development Department
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ Decrease the number of unresolved code violations within the City and increase the number of improved properties.
Timeframe:	This program will be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

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.

Funding:	State/Federal Grants
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ Assist 80 households during the planning period, with an average of 10 households annually. ▪ Continue to provide community outreach regarding available loans and grants for needed home improvements.

Timeframe:	This program will be monitored annually and implemented on an ongoing basis through the remainder of the planning period. 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 December 15, 2022 and then annually thereafter (see Table 14, Appendix C).
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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.

Funding:	CDBG
Responsible Agency:	Administrative Services Department, Public Works Department
Objectives:	<ul style="list-style-type: none"> Continued implementation of neighborhood public improvements, property maintenance ordinance, design review, and historical preservation ordinance.
Timeframe:	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.

Funding:	Department Budget
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> ▪ Continue to provide zoning at appropriate densities to provide opportunities for accommodating the regional housing needs. 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. ▪ Create opportunity for at least 510 units of multi-family housing for lower income households. ▪ Maintain an ongoing inventory of multi-family residential and mixed-use sites and provide updated information on sites on City website. ▪ Maintain an ongoing inventory of City-owned properties and other surplus sites owned by other public agencies that may be appropriate for residential uses. ▪ Continue to update the Infill Affordable Housing Map to indicate suitable infill development sites. ▪ Provide residential sites information to interested developers. ▪ Investigate tracking rents for accessory dwelling units in 2021. ▪ 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 in those areas.
Timeframe:	Change land use and zoning designations of proposed VHDR properties by October 2023. Remaining This 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> ▪ Maintain an updated inventory of residential housing developments that have been submitted, approved, and denied. ▪ 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. ▪ Amend the Zoning Ordinance by October 2023 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. ▪ Annually monitor the City's remaining housing capacity to ensure compliance with SB 166.
Timeframe:	Outreach and discussion opportunities regarding sites available for lower and moderate income housing development shall occur before December 15, 2022 (See Appendix C). Amendments of the Zoning Ordinance shall occur by October 2023. Remaining This program elements should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Program 6: Sites Used in Previous Planning Periods Housing Elements

In 2017, AB 879 and AB 1397 were passed, requiring additional analysis and justification of the sites included in the sites inventory of the City's Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Some sites within this Housing Element were used in previous cycles and this program is included to address the by-right approval requirement. Per AB 1397, the use by right of these sites during the planning period is restricted to developments in which at least 20 percent of the units in the development are affordable to lower income households, provided that these sites have sufficient water, sewer, and other dry utilities available and accessible or that they are included in an existing general plan program or other mandatory program or plan to secure sufficient water, sewer, dry utilities supply to support housing development.

Funding:	Department Budget
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> * The City shall rezone or amend its Zoning Code by October 2023 to allow by-right approval for housing developments proposed for non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements, provided that the proposed housing development consists of at least 20 percent lower income and affordable housing units

Timeframe:	This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.
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Program 76: Lot Consolidation and Infill Development

Where feasible, the City also encourages infill development and lot consolidation in the 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. Other The City encourage development through ongoing communication with developers and offering development incentives for lot consolidation include reduced parking, increased sign area, and reduced setbacks 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. This program aims to continue to facilitate lot consolidation or residential and mixed-use developments by providing information and technical assistance to property owners and developers.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> 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. Meet with developers to identify and discuss potential project sites for infill, redevelopment, and mixed-use development on an ongoing basis. Notify developers when the sites go on sale. Offer incentives for lot consolidation when minimum standards are met (after October 2023 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.
Timeframe:	This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Program 8: Housing Development (Infill and Mixed Use)

Infill housing and mixed-use development helps promote investment in older neighborhoods while also contributing to meet the community’s housing needs. This program will 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.

Funding:	Departmental budget, Grants
Responsible Agency:	Community Development Department

Objectives:	<ul style="list-style-type: none"> Facilitate development of multi-family and mixed-use development in the downtown and nearby areas, with special emphasis on housing affordable to extremely low and low income households of persons with special needs. Zoning Code must be amendment by October 2023.
Timeframe:	This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Program 97: 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.

Funding:	HOME Funds
Responsible Agency:	Administrative Services Department
Objectives:	<ul style="list-style-type: none"> 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. Pursue available funds for multi-family acquisition and rehabilitation.
Timeframe:	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 108: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ Provide administrative assistance to developers seeking available State and federal funding and/or tax credits for the construction of <u>low-and-moderate-incomeaffordable</u> housing. ▪ Facilitate projects that incorporate affordable units and accessible units by granting modifications to development standards, expedited processing, or financial incentives consistent with State law. ▪ Contact affordable housing developers each year to solicit interest and apprise them of available assistance programs. ▪ <u>Prioritize T</u> targeted assistance <u>will be prioritized for</u> special needs housing and extremely-low-income (ELI) units through density bonuses and/or regulatory incentives, modified development standards and fee deferrals, when feasible. ▪ 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. ▪ Continue to monitor policies, standards, and regulations <u>to-and</u> <u>make annual updates to remove identified constraints to</u> <u>development of housing for special needs populations.ensure that</u> <u>they do not unduly impact persons with special needs.</u> ▪ <u>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.</u> ▪ <u>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.</u> ▪ <u>Annually monitor policies, standards, and regulations to ensure that they do not unduly impact persons with special needs.</u> ▪ <u>Continue to provide funding for local and sub-regional homeless service providers that operate temporary and emergency shelters.</u> ▪ <u>Assist (when possible) local non-profits and charitable organizations in securing state and federal funding for the acquisition, construction, and management of shelters.</u> ▪ <u>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.</u> ▪ <u>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.</u>

	<ul style="list-style-type: none"> ▪ Continue to process requests for reasonable accommodation in conformance with State law and the Development Code. ▪ Evaluate the use and effectiveness of the reasonable accommodation ordinance through the annual Housing Element Progress Reports. ▪ Continue to provide opportunities for the development of affordable housing for seniors and persons with disabilities. ▪ 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. ▪ 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.). ▪ 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. ▪ 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 October 2023. ▪ Amend the zoning ordinance by October 2023 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.
Timeframe:	Amendment of the Zoning Ordinance shall occur by October 2023. The remaining elements of tThis program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Program 11: Housing for Persons Experiencing Homelessness

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.

The Program is for Banning households who are at risk of becoming homeless as defined by HUD and focuses on self-sufficiency and stabilization. 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.

Funding:	CDBG
Responsible Agency:	Administrative Services Department
Objectives:	<ul style="list-style-type: none"> • Continue to monitor policies, standards, and regulations to ensure that they do not unduly impact persons with special needs. • 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. • Continue to provide funding for local and sub-regional homeless service providers that operate temporary and emergency shelters. • Assist (when possible) local non-profits and charitable organizations in securing state and federal funding for the acquisition, construction, and management of shelters. • 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 documents as part of the General Plan and Zoning Code. • 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. ▪ Commit to reducing parking lot requirements for homeless shelters that are able to demonstrate a reduced parking need.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 12: Housing Accommodation for Persons with Disabilities

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.

Funding:	Department Budget
Responsible Agency:	Community Development Department

Objectives:	<ul style="list-style-type: none"> • Continue to process requests for reasonable accommodation in conformance with state law and the Development Code. • Evaluate the use and effectiveness of the reasonable accommodation ordinance through the annual Housing Element Progress Reports. • Continue to provide opportunities for the development of affordable housing for seniors and persons with disabilities. • The City shall 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.
Timeframe:	This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Program 13: Supportive and Transitional Housing Program

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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> • Continue to monitor policies, standards, and regulations regarding supportive housing developments and opportunities in the City. • Nurture ongoing and potential partnerships that help educate and execute the development of supportive and transitional housing. • Amend the zoning ordinance to allow supportive housing in multi-family and mixed-use zones by right, by October 2023. ▪ Amend the zoning ordinance 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.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Removal of Constraints on Housing Development

Program 149: 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. 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> Monitor the City's Zoning Ordinance to ensure standards do not excessively constrain affordable residential development. Amend the Zoning <u>OrdinanceCode</u> by October 2023 to comply with AB 139 to permit emergency shelters by right in residential zones. <u>and Amend the Zoning Ordinance by October 2023 to comply with</u> 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. Amend the Zoning <u>OrdinanceCode</u> by October 2023 to comply with AB 2162 to permit transitional and supportive housing by right in residential zones. Amend the Zoning Ordinance by October 2023 to comply with the Employee Housing Act <u>to accommodate farmworker housing in RA and RA-H zones.</u> Amend the Zoning Ordinance by October 2023 to comply with the most recent ADU legislation. <u>Amend the Zoning Ordinance by October 2023 to remove subjective text seen as a constraint to the development of residential care facilities.</u> <u>Remove the Conditional Use Permit requirement for single-resident occupancy (SRO) developments in the Zoning Ordinance by October 2023.</u>
Timeframe:	<u>This-The monitoring</u> program will be implemented on an ongoing basis through the remainder of the planning period. <u>Amendments to the Zoning Ordinance to occur by October 2023.</u>

Program 1510: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ <u>Annually monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints and enhance the feasibility of affordable housing, while maintaining the quality of housing.</u> ▪ <u>Amend the Zoning Ordinance by October 2023 to remove the two-acre minimum currently required for multi-family development in MDR zones.</u> <u>Monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints and enhance the feasibility of affordable housing, while maintaining the quality of housing.</u>
Timeframe:	<u>Amendment of the Zoning Ordinance shall occur by October 2023.</u> This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 1611: 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 their Fee Schedule every two years by the City's Finance Department.

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

Program ~~1712~~: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> Continue to monitor and improve the project review and approval process. Design and layout of proposed projects will be thoroughly reviewed to reduce hazards and additional impediments on surrounding development and neighborhood characteristics. The City shall establish and adopt clear and objective design standards for multi-family and mixed-use housing projects by October 2023.
Timeframe:	<u>Objective and design standards shall be adopted by October 2023.</u> <u>Monitoring and improving the project review and approval process This program</u> will be implemented on an ongoing basis through the remainder of the planning period.

Affordable Housing Development and Assistance

Program ~~1813~~: 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.

Funding:	Department Budget, Banning Housing Authority
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> Utilize DAP funding to provide assistance to 40 very-low and low-income households during the planning period.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 1914: 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.

Funding:	Federal Tax Credits, Riverside County Economic Development Agency (EDA)
Responsible Agency:	Riverside EDA
Objectives:	<ul style="list-style-type: none"> Provide information regarding the MCC Program to eligible home buyers. Coordinate proactively with Riverside County on annual monitoring of the effectiveness of the MCC program.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 2015: 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.

Funding:	Federal HUD Section 8
Responsible Agency:	Housing Authority of Riverside County (HARIVCO)
Objectives:	<ul style="list-style-type: none"> ▪ Continue to support the HARIVCO's applications for additional Section 8 allocations and efforts to provide vouchers for lower-income residents. ▪ Apply for additional Housing Choice Vouchers when made available by HUD. ▪ Proactively seek additional funding that can be used, in addition to Section 8 funds, to provide subsidies to lower-income households.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 2+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 Geronimo 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.

Funding:	CDBG and HOME funds
Responsible Agency:	Administrative Services Department
Objectives:	<ul style="list-style-type: none"> ▪ 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. ▪ 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 lower income units over eight years. ▪ Annually seek additional funding sources and identify new partnerships to greater expand resources in the city ▪ 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 ▪ Investigate funding opportunities to provide rehabilitation services to homeowners and people amongst the vulnerable and low-

	income communities. 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.
Timeframe:	This program will be monitored annually and implemented on an ongoing basis through the remainder of the year.

*Program **2217**: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ Update the Banning Zoning Ordinance / Municipal Code by October 2023 to integrate future changes in State Density Bonus Law, including update to reflect the requirements of AB 2345 (2020). ▪ Continue to advertise and inform prospective developers of options for density bonuses, and actively educate and promote density bonus increases as adopted. ▪ Meet with developers to discuss incentives and concessions appropriate for the density bonus program to facilitate affordable housing development. ▪ Promote the use of density bonus incentives by providing information on City website and offering technical assistance to developers <u>through the Fast Track program and providing staff resources without additional costs to the developers.</u>
Timeframe:	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 **2318**: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> Annually monitor policies, standards, and regulations regarding environmental justice in the City. 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 the California Environmental Justice Alliance or similar organization at least once annually.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

*Program **2419**: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> 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. Rezone underutilized commercial, office, and or industrial space, as appropriate, to facilitate use for alternative housing types on or before October 2023, and then annually as opportunities arise. Develop, as part of a zoning ordinance update, measures that encourage affordability by design (e.g., smaller, more efficient and flexibly-design living spaces). 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. Evaluate and implement a development fee structure for these units based on a per square foot basis rather than per unit basis. 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.
Timeframe:	This program should be monitored annually and implemented on an ongoing basis through the remainder of the planning period.

Sustainable Residential Development

Program 2520: 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.

Funding:	Department Budget, Banning Housing Authority
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> ▪ 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.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 2621: 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.

Funding:	Department Budget, Banning Housing Authority
Responsible Agency:	Community Development Department/Planning
Objectives:	<ul style="list-style-type: none"> ▪ 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.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 2722: 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.

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

Fair Housing Practices

Program 2823: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ 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. ▪ Ensure that public meetings and other planning processes are offered in more than one language. ▪ Make public announcements and information accessible and visible in a multitude of ways.
Timeframe:	This program should be implemented on an ongoing basis through the remainder of the planning period.

*Program **2924**: 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 programs 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 (partnering with Program 33) to help spread the word on new community attractions in various neighborhoods and educate community groups on new community activities

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ 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 by the end of 2024. ▪ Expand public outreach to target all neighborhoods and educate people from all types of community groups on new and upcoming neighborhood projects and activities.
Timeframe:	This program should be implemented on an ongoing basis through the remainder of the planning period.

Program 3025: 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.

Funding:	Riverside County, Department Budget
Responsible Agency:	Riverside County
Objectives:	<ul style="list-style-type: none"> ▪ 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. ▪ 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. ▪ 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. ▪ 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. ▪ 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 will be a priority.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 3126: Fair Housing Council of Riverside County Program

The City is committed to supporting advocacy and educational activities to reduce or eliminate discrimination. 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.

Funding:	CDBG funds
Responsible Agency:	Administrative Services Department and Fair Housing Service Provider
Objectives:	<ul style="list-style-type: none"> ▪ Continue to provide CDBG funds to a fair housing service provider. ▪ 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. ▪ Make available bilingual fair housing assistance and materials. ▪ Implement recommended action items identified in the Analysis of Impediments to Fair Housing Choice for Riverside County.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

*Program **3227**: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ 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. ▪ 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. ▪ 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. ▪ 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 2024. ▪ 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 will be a priority.
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

*Program **3328**: Segregation in Housing Implementation*

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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ <u>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, while maintaining the quality of housing.</u> ▪ <u>Prioritize housing capacity, housing and infrastructure resources and investments, policies, and incentives for market rate and affordable housing development in areas of overcrowding and lower access to resources (as described in Appendix C), and annually monitor progress.</u>
Timeframe:	This program will be implemented on an ongoing basis through the remainder of the planning period.

Program 3429: 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.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> ▪ <u>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.</u> ▪ <u>Encourage and facilitate the development of housing affordable to lower-income households.</u>
Timeframe:	<u>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.</u>

Program 3530: ADU Facilitation and Promotion Program

The City will promote ADU development.

Funding:	Department Budget
Responsible Agency:	Community Development Department
Objectives:	<ul style="list-style-type: none"> By October 2023, update the Zoning Ordinance/Municipal Code to integrate changes in State housing law. Annually monitor ADU production. Provide information about ADU permitting on the City's website. Maintain and update an informational brochure to promote, educate, and assist homeowners with developing ADUs. Work with developers to incorporate ADUs into new single-family developments.
Timeframe:	October 2023 and ongoing throughout the planning period.

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.

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), Program 26: Fair Housing Council of Riverside County Program), and Program 27:

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 27 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	0	113
Moderate Income	280	20	0	300
Above Moderate Income	883	20	0	903
Total	1,689	80	0	1,669

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Appendix A

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
Total	1,673	100

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.

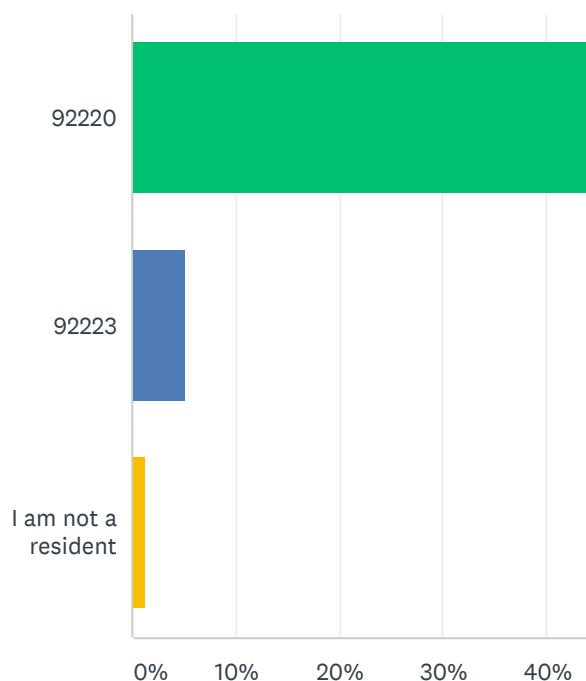
The Accountability and Enforcement Division was created due to the passage of Assembly Bill (AB) 72 and AB 101. These laws give additional enforcement tools to HCD and the California Attorney General to move forward with legal action against a local jurisdiction if the Housing Element is not compliant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

Answered: 78 Skipped: 1

City of Banning Housing Element Update Publ...  (0)

Answered: 28 Skipped: 51

140

None

senior

NO

N/a

No

NAMI

N/a

No

No

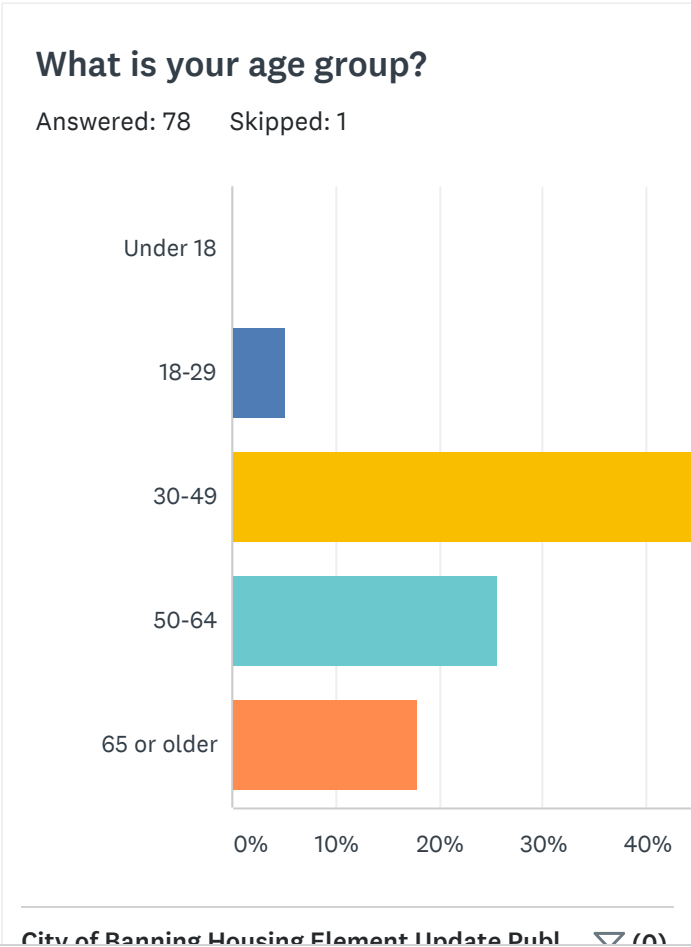
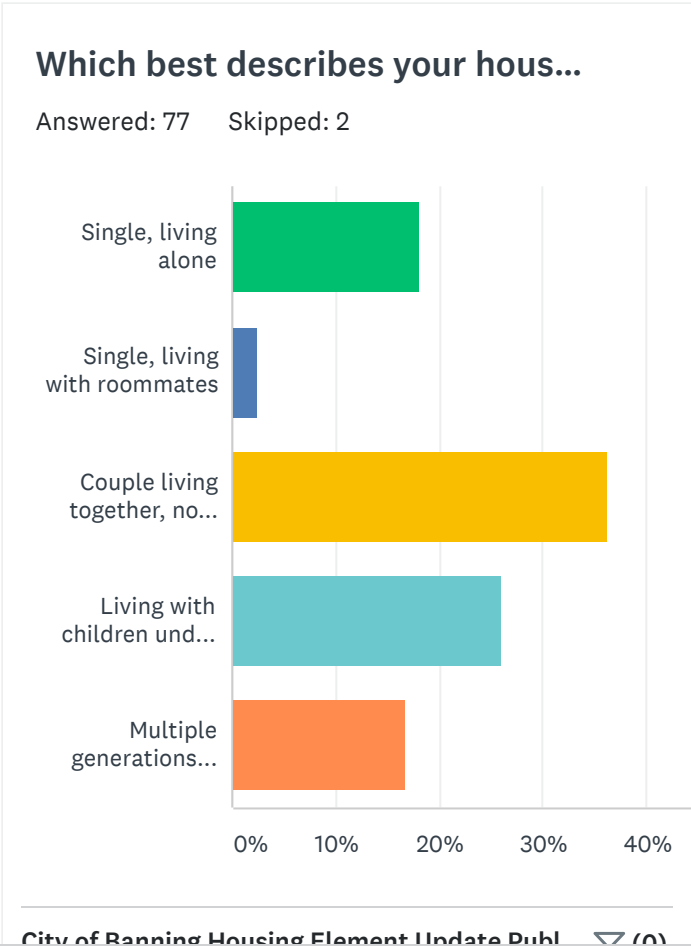
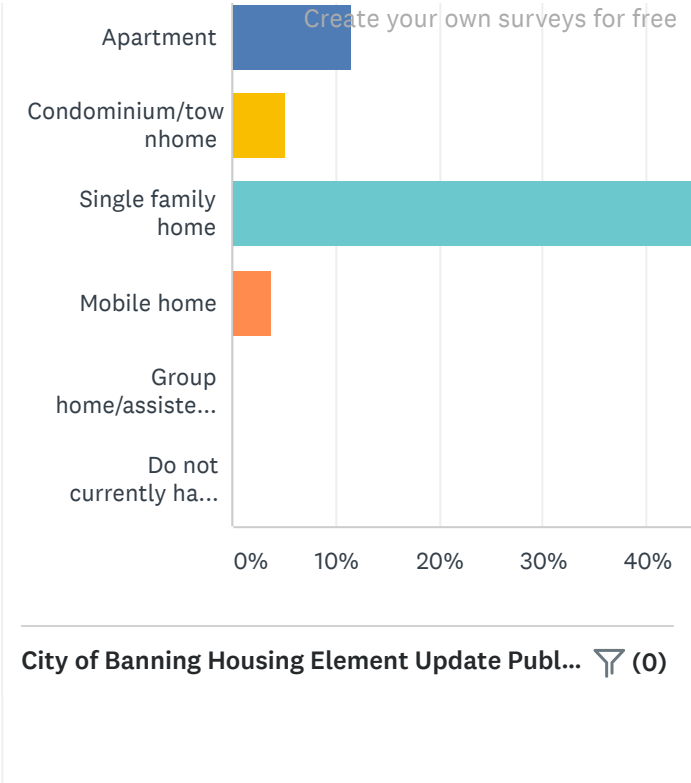
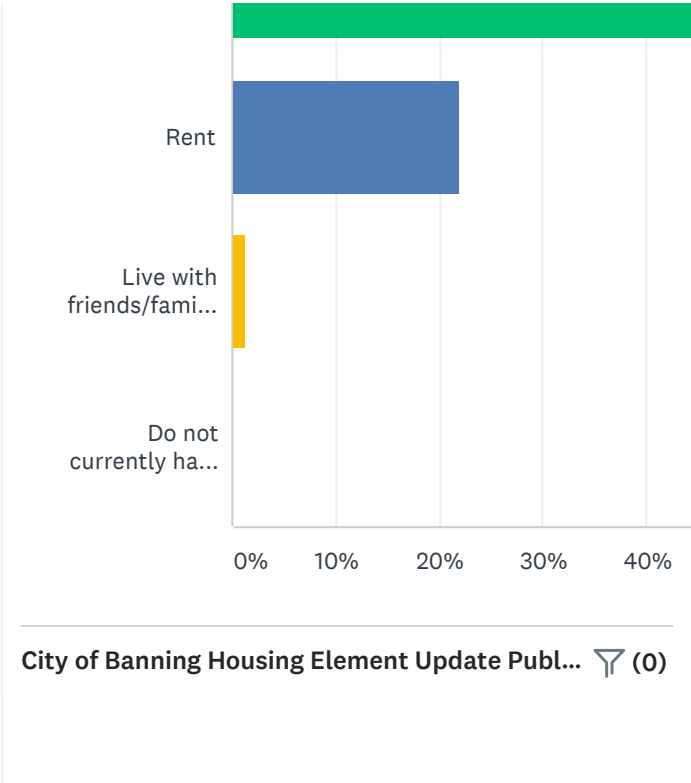
City of Banning Housing Element Update Publ...  (0)

Answered: 77 Skipped: 2

Answered: 78 Skipped: 1

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

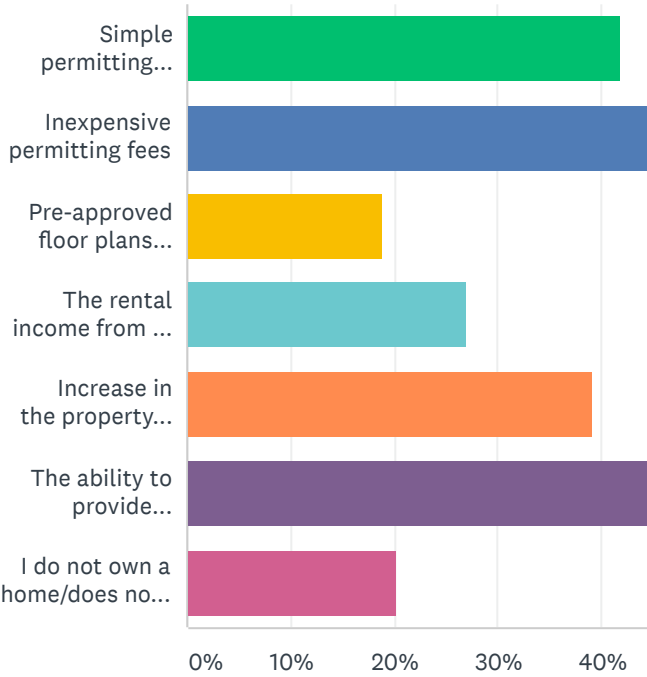
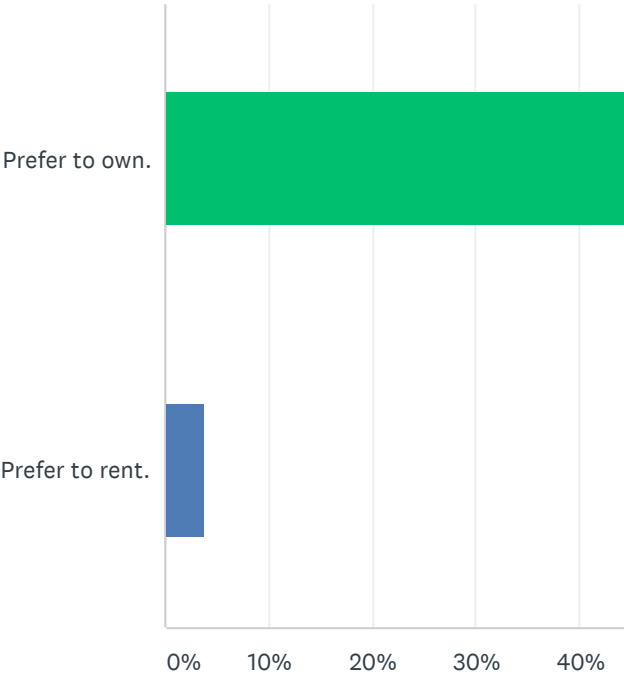
COPY



City of Banning Housing Element Update Public Outreach Survey

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City of Banning Housing Element Update Publ... (0)

City of Banning Housing Element Update Publ... (0)

Using a numeric rating from 1 th...

Answered: 78 Skipped: 1

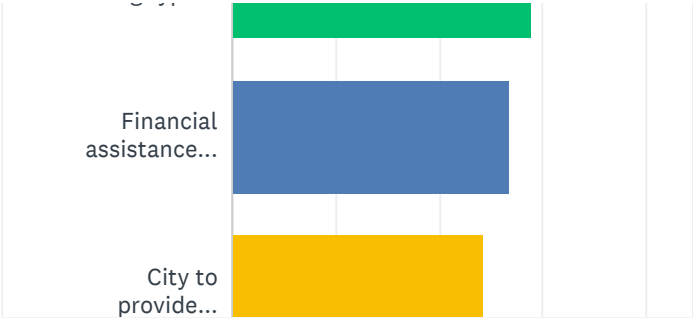
Do you think new housing shoul...

Answered: 79 Skipped: 0

Dashboard Share Link

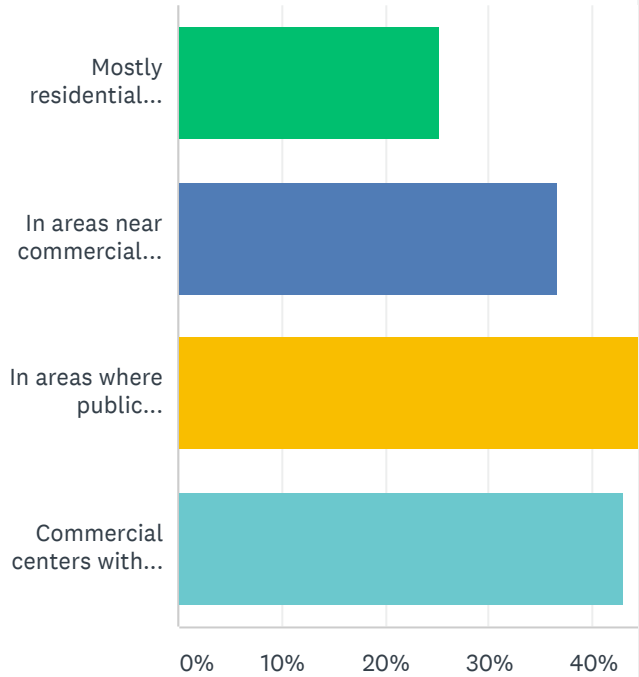
<https://www.surveymonkey.com/stories/SM-XPWLJFGC/>

COPY



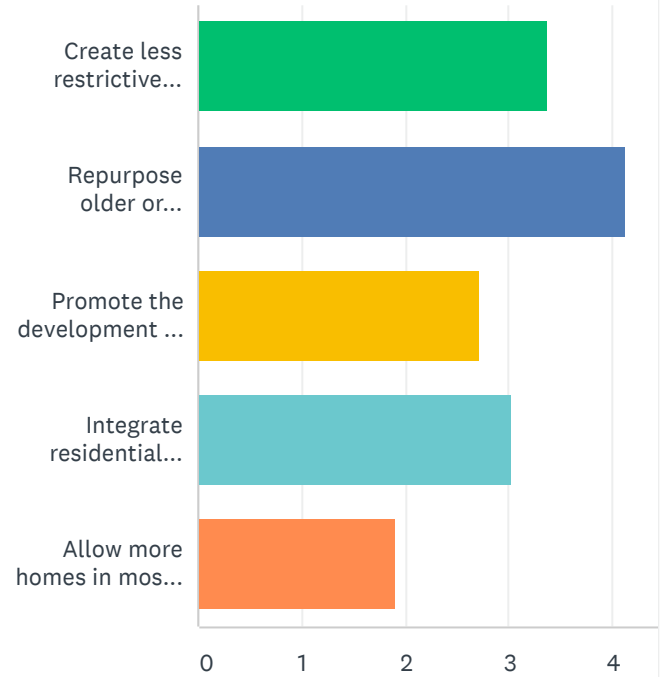
Which areas of the City do you t...

Answered: 79 Skipped: 0



The State of California mandate...

Answered: 77 Skipped: 2



City of Banning Housing Element Update Publ... (0)

City of Banning Housing Element Update Publ... (0)

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

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

Appendix B

Sites Inventory

Appendix B-1 Vacant and Underutilized Sites

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Site Disposition	Optional Information#2	Optional Information#3
BANNING	Sunset Ave.	92220	53106071 A		RR	RR	0	1	3.522418029	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	Sunset Ave.	92220	53106072 A		RR	RR	0	1	3.336014171	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	Sunset Ave.	92220	53107001 B		LDR	LDR	0	5	9.757231294	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	36	36	N/A	--	--
BANNING	Sunset Ave.	92220	53107006 B		LDR	LDR	0	5	2.14704059	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	N/A	--	--
BANNING	Charles St.	92220	532180007		RR	RR	0	1	9.277908655	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	N/A	--	--
BANNING	S Highway 91	92220	532180025		RR	RR	0	1	5.928654419	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	N/A	--	--
BANNING	E Reppiller Rd.	92220	534093004 C		LDR	LDR	0	5	5.546318194	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	E Reppiller Rd.	92220	534093005 C		LDR	LDR	0	5	5.545964919	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	677 E Indian School Ln.	92220	534093012 C		LDR	LDR	0	5	5.510384157	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	N/A	--	--
BANNING	E Reppiller Rd.	92220	534093014 C		LDR	LDR	0	5	4.567117243	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	N/A	--	--
BANNING	N Hargrave St.	92220	534123002 D		LDR	LDR	0	5	1.289822514	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	N/A	--	--
BANNING	Almond Way.	92220	534121007 D		LDR	LDR	0	5	0.631040484	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	Almond Way.	92220	534122003 E		LDR	LDR	0	5	0.941829853	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	N/A	--	--
BANNING	E Indian School Ln.	92220	534122004 E		LDR	LDR	0	5	0.941832417	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	N/A	--	--
BANNING	E Theodore St.	92220	534148016		LDR	LDR	0	5	2.27602258	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	N/A	--	--
BANNING	E Indian School Ln.	92220	534151005 F		LDR	LDR	0	5	1.726590661	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	N/A	--	--
BANNING	E Indian School Ln.	92220	534151023 F		LDR	LDR	0	5	0.939505574	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	N/A	--	--
BANNING	E Indian School Ln.	92220	534152022 G		LDR	LDR	0	5	1.316685918	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	N/A	--	--
BANNING	E Indian School Ln.	92220	534152023 G		LDR	LDR	0	5	1.138781721	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	N/A	--	--
BANNING	N Hermosa Ave.	92220	534161008		HDR	HDR	11	18	0.39	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	7	0	7	N/A	--	--
BANNING	N Hermosa Ave.	92220	534161010		HDR	HDR/20/AHO	20	24	0.903244846	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	21	0	21	N/A	--	--
BANNING	Gilman St.	92220	534172002 H		LDR	LDR	0	5	3.846198525	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	N/A	--	--
BANNING	Gilman St.	92220	534172004 H		LDR	LDR	0	5	1.106819191	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	N/A	1957	0.57
BANNING	Gilman St.	92220	534172005 H		LDR	LDR	0	5	1.878258551	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	1947	0.13
BANNING	E Wilson St.	92220	534180011		LDR	LDR	0	5	0.55272822	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	1953	0.36
BANNING	N Phillips St.	92220	534253006		LDR	LDR	0	5	3.697978881	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	N/A	--	--
BANNING	N Blanchard St.	92220	534253007		LDR	LDR	0	5	2.742546094	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	N/A	1949	0.27
BANNING	N 19th St.	92220	535120014		LDR	LDR	0	5	0.646279023	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	N/A	1947	0.37
BANNING	W Gilman St.	92220	535194021		LDR	LDR	0	5	1.071035947	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	N/A	--	--
BANNING	Evergreen Ln.	92220	535371005		VLDR	VLDR	0	2	0.599673836	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	N/A	1951	0.71
BANNING	Nongarell Ave.	92220	537150005 J		VLDR	VLDR	0	2	7.454652496	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	N/A	--	--
BANNING	Nongarell Ave.	92220	537150006 J		VLDR	VLDR	0	2	6.435295504	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	N/A	--	0.25
BANNING	Nongarell Ave.	92220	537150007 J		VLDR	VLDR	0	2	8.007389014	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	N/A	1946	--
BANNING	S 22nd St.	92220	537160021		RR	RR	0	1	1.329846444	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	N/A	--	--
BANNING	Hale Ave.	92220	537190020 K		VLDR	VLDR	0	2	9.202353953	Vacant	YES - Planned	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	N/A	--	--
BANNING	Lovel St.	92220	537190021 K		VLDR	VLDR	0	2	9.392756564	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	N/A	--	--
BANNING	Catchen Rd.	92220	537211002		HDR	HDR	11	18	0.48	Residential (1)	YES - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	5	0	5	N/A	--	--
BANNING	716 N Sunset Ave.	92220	538020027		MDR	MDR	0	10	0.526805352	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	N/A	--	77.97
BANNING	N 20th St.	92220	538070008 L		LDR	LDR	0	5	0.586055162	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	1.74
BANNING	W George St.	92220	538070018		LDR	LDR	0	5	1.591375729	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	N/A	--	--
BANNING	Sims St.	92220	538070063 L		LDR	LDR	0	5	1.372151122	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	N/A	--	--
BANNING	Morongo Ave.	92220	538111013 M		MDR	MDR	0	10	0.837144307	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	N/A	--	--
BANNING	Sunset Ave.	92220	538111033 M		MDR	MDR	0	10	0.71027053	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	N/A	--	--
BANNING	N 16th St.	92220	538142018		LDR	LDR	0	5	0.694344875	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	N/A	--	--
BANNING	Robbie Ave.	92220	538150014		MDR	MDR	0	10	0.814889534	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	N/A	1956	2.75
BANNING	2275 W Hays St.	92220	538161001 AQ		HDR	HDR	11	18	0.24	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	N/A	1909	0.17
BANNING	2297 W Hays St.	92220	538162002 AQ		HDR	HDR	11	18	0.18	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	1927	0.38
BANNING	2329 W Hays St.	92220	538163003 AQ		HDR	HDR	11	18	0.22	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	--	79.28
BANNING	2369 W Hays St.	92220	538163004 AQ		HDR	HDR	11	18	0.38	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	N/A	1948	0.18
BANNING	2368 W Williams St.	92220	538163005 AQ		HDR	HDR	11	18	0.28	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	N/A	--	0.43
BANNING	2326 W Williams St.	92220	538163006 AQ		HDR	HDR	11	18	0.25	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	N/A	1939	0.13
BANNING	88 SUNRISE AVE.	92220	538162001 AR		HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	1945	0.57
BANNING	2356 W Hays St.	92220	538162002 AR		HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	1946	0.16
BANNING	2320 W Hays St.	92220	538163003 AR		HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	--	--
BANNING	2290 W Hays St.	92220	538162004 AR		HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	--	--
BANNING	2280 W Hays St.	92220	538162005 AR		HDR	HDR	11	18	0.19	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	1936	0.41
BANNING	2260 W Hays St.	92220	538162006 AR		HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	N/A	--	0.41
BANNING	2250 W Hays St.	92220	538162007 AR		HDR	HDR	11	18	0.18	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1					

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Site Disposition	Optional Information 2	Optional Information 3, Optional Information 3
BANNING	515 N 3rd St.	92220	540081006	AS	HDR	HDR	11	18	0.25	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Operating	1947	0.21
BANNING	416 N 4th St.	92220	540081011	AS	HDR	HDR	11	18	0.17	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1979	0.38
BANNING	436 N 4th St.	92220	540081012	AS	HDR	HDR	11	18	0.15	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	--	--
BANNING	479 N 3rd St.	92220	540081018	AS	HDR	HDR	11	18	0.16	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	--	0.16
BANNING	417 N 3rd St.	92220	540081022	AS	HDR	HDR	11	18	0.15	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	--	0.78
BANNING	464 N 4th St.	92220	540081023	AS	HDR	HDR	11	18	0.27	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	1946	0.13
BANNING	380 N 3rd St.	92220	540082001	AT	HDR	HDR	11	18	0.28	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	1947	0.41
BANNING	214 N George St.	92220	540082021	AT	HDR	HDR	11	18	0.28	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Operating	--	--
BANNING	545 N 2nd St.	92220	540082003	AT	HDR	HDR	11	18	0.38	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	4	0	4	Operating	1956	0.12
BANNING	524 N 3rd St.	92220	540082006	AT	HDR	HDR	11	18	0.32	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Marginal	1982	0.43
BANNING	490 N 3rd St.	92220	540082007	AT	HDR	HDR	11	18	0.11	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	--	--
BANNING	N 3rd St.	92220	540082008	AT	HDR	HDR	11	18	0.13	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	1948	0.14
BANNING	N 3rd St.	92220	540082009	AT	HDR	HDR	11	18	0.13	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1982	0.33
BANNING	233 W Nicolet St.	92220	540082010	AT	HDR	HDR	11	18	1.16	Apartment	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	15	0	15	Marginal	1949	0.16
BANNING	495 N 2nd St.	92220	540082012	AT	HDR	HDR	11	18	0.16	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Discontinued	1946	0.20
BANNING	515 N 2nd St.	92220	540082013	AT	HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	To Be Discontinued	1946	0.37
BANNING	Cottonwood Rd.	92220	540091017	MDR	MDR	MDR	0	10	0.511485155	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	3	Marginal	1956	0.43
BANNING	N 16th St.	92220	540130025	AK	MDR	MDR	0	10	0.3	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Operating	1947	0.63
BANNING	W Hays St.	92220	540130026	AK	MDR	MDR	0	10	0.3	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Operating	1950	0.71
BANNING	376 N 4TH ST.	92220	540151001	AU	HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1947	0.31
BANNING	312 N 4TH ST.	92220	540151005	AU	HDR	HDR	11	18	0.19	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	--	0.41
BANNING	292 N 4TH ST.	92220	540151006	AU	HDR	HDR	11	18	0.24	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	1935	1.64
BANNING	218 N 4TH ST.	92220	540151010	AU	HDR	HDR	11	18	0.16	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	1947	0.14
BANNING	324 W Nicolet St.	92220	540151024	AV	HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1929	0.49
BANNING	384 N 3rd St.	92220	540152001	AV	HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1931	0.10
BANNING	N 3rd St.	92220	540152010	AV	HDR	HDR	11	18	0.27	Commercial, Church/rel	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Operating	--	0.19
BANNING	235 N 2nd St.	92220	540152011	AV	HDR	HDR	11	18	0.4	Commercial, Church/rel	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	5	0	5	Marginal	1946	0.29
BANNING	305 N 2nd St.	92220	540152012	AV	HDR	HDR	11	18	0.4	Commercial Preschool	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	5	0	5	Marginal	1992	0.60
BANNING	258 N 3rd St.	92220	540152013	AV	HDR	HDR	11	18	0.27	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Operating	1950	0.24
BANNING	343 N 2nd St.	92220	540152020	AV	HDR	HDR	11	18	0.27	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Operating	1948	0.71
BANNING	290 N 3rd St.	92220	540152021	AV	HDR	HDR	11	18	0.27	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	1946	0.57
BANNING	W Westward Ave.	92220	540240011	O	VLDL	VLDL	0	2	1.937755062	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Operating	--	--
BANNING	521 N Westward Ave.	92220	540240013	AO	VLDL	VLDL	0	2	4.849326999	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Marginal	1960	0.10
BANNING	S 8th St.	92220	540240014	O	VLDL	VLDL	0	2	4.414391661	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Marginal	1985	0.34
BANNING	E George St.	92220	541070005	LDR	LDR	LDR	0	5	0.928482861	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Operating	1978	0.24
BANNING	585 E George St.	92220	541070020	LDR	LDR	LDR	0	5	0.901127389	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Marginal	--	--
BANNING	382 E George St.	92220	541082011	LDR	LDR	LDR	0	5	0.824469061	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Operating	1927	0.20
BANNING	E George St.	92220	541082016	LDR	LDR	LDR	0	5	0.927678919	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	0	0	Operating	1986	0.18
BANNING	1130 E George St.	92220	541082017	LDR	LDR	LDR	0	5	1.842821788	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Operating	--	8.78
BANNING	E Nicolet St.	92220	541082021	LDR	LDR	LDR	0	5	0.91671856	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Operating	--	--
BANNING	E Nicolet St.	92220	541082022	LDR	LDR	LDR	0	5	0.810973122	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Marginal	1949	0.09
BANNING	276 N Alessandro St.	92220	541103019	BB	HDR	HDR	11	18	0.21	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Operating	1947	0.19
BANNING	258 N Alessandro St.	92220	541103020	BB	HDR	HDR	11	18	0.33	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Marginal	--	--
BANNING	381 E Williams St.	92220	541103026	AV	HDR	HDR	11	18	0.29	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	--	--
BANNING	208 E Nicolet St.	92220	541103028	BB	HDR	HDR	11	18	0.17	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	To Be Discontinued	--	0.45
BANNING	401 E Williams St.	92220	541110004	AY	HDR	HDR	11	18	0.87	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	10	0	10	Operating	--	--
BANNING	630 E Nicolet St.	92220	541110006	AZ	HDR	HDR	11	18	0.84	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	10	0	10	Operating	--	--
BANNING	E Nicolet St.	92220	541110007	AZ	HDR	HDR	11	18	0.78	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	14	0	14	Operating	--	--
BANNING	884 E Nicolet St.	92220	541110008	AZ	HDR	HDR	11	18	0.96	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	11	0	11	Marginal	1982	--
BANNING	228 E Nicolet St.	92220	541110009	BA	HDR	HDR	11	18	1.6	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	20	0	20	Marginal	--	--
BANNING	607 E Williams St.	92220	541110010	AZ	HDR	HDR	11	18	0.58	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	6	0	6	Marginal	1946	0.32
BANNING	E Williams St.	92220	541110011	AZ	HDR	HDR	11	18	0.57	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	10	0	10	Operating	1927	0.28
BANNING	855 E Williams St.	92220	541110012	AZ	HDR	HDR	11	18	0.56	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	6	0	6	Operating	--	0.33
BANNING	725 E Williams St.	92220	541110013	BA	HDR	HDR	11	18	1.68	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	20	0	20	Marginal	1946	0.46
BANNING	281 N Hargrave St.	92220	541110014	BA	HDR	HDR	11	18	0.18	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Marginal	--	--
BANNING	257 N Hargrave St.	92220	541110015	BA	HDR	HDR	11	18	0.35	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Marginal	1977	0.87
BANNING	765 E Williams St.	92220	541110016	BA	HDR	HDR	11	18	0.34	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	3	0	3	Invalid Address/APN	1945	0.18
BANNING	385 E Nicolet St.	92220	541110018	AZ	HDR	HDR	11	18	0.37	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Operating	1979	0.14
BANNING	N Hargrave St.	92220	541210017	T	LDR	LDR	0	5	0.581667105	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Operating	1984	0.10
BANNING	E Williams St.	92220	54121045	T	LDR	LDR	0	5	1.038548855	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Marginal	--	--
BANNING	E Williams St.	92220	541220010	LDR	LDR	LDR	0	5	2.363278272	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Marginal	1960	0.13
BANNING	E Barbours St.	92220	541300025	U	LDR	LDR	0	5	1.463113403	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Operating	--	--
BANNING	E Barbours St.	92220	541300027	U	LDR	LDR	0	5	1.833123114	Vacant	YES - Potential	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Operating	--	--
BANNING	214 E George St.	92220	541340001	AX	HDR	HDR	11	18	0.17	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	--	--
BANNING	540 N Alessandro St.	92220	541340004	AX	HDR	HDR	11	18	0.29	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Marginal	1952	0.80
BANNING	532 N Alessandro St.	92220	541340005	AX	HDR	HDR	11	18	0.2	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Marginal	1949	0.64
BANNING	250 E George St.	92220	541340009	AX	HDR	HDR	11	18	0.46	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	5	0	5	Marginal	2008	0.20
BANNING	492 N Alessandro St.	92220	541350001	AX	HDR	HDR	11	18	0.23	Residential (1)	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Operating		

Appendix B-2 Sites to be Rezoned

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses
BANNING	W Jacinto View Rd.	92220	537020008	45	46	0	0	Unaccommodated Need	4.059263282	LDR	LDR	VHDR	VHDR	20	30	91	Vacant	Vacant
BANNING	S Woodland Ave.	92220	538250004	104	104	0	0	Unaccommodated Need	9.247403735	LDR	LDR	VHDR	VHDR	20	30	208	Vacant	Vacant
BANNING	E George St.	92220	541094020	25	26	0	0	Unaccommodated Need	2.294840232	LDR	LDR	VHDR	VHDR	20	30	51	Vacant	Vacant
BANNING	E Williams St.	92220	541103022	6	6	0	0	Unaccommodated Need	0.555314173	LDR	LDR	VHDR	VHDR	20	30	12	Vacant	Vacant
BANNING	E Williams St.	92220	541103023	6	6	0	0	Unaccommodated Need	0.54565581	LDR	LDR	VHDR	VHDR	20	30	12	Vacant	Vacant
BANNING	E Williams St.	92220	541103025	21	21	0	0	Unaccommodated Need	1.891964852	LDR	LDR	VHDR	VHDR	20	30	42	Vacant	Vacant
BANNING	S San Geronio Ave.	92220	543060002	53	53	0	0	Unaccommodated Need	4.71378882	LDR	LDR	VHDR	VHDR	20	30	106	Vacant	Vacant
BANNING	S San Geronio Ave.	92220	540250014	14	14	0	0	Unaccommodated Need	1.286624702	MDR	MDR	VHDR	VHDR	20	30	28	Vacant	Vacant
BANNING	S San Geronio Ave.	92220	540250023	25	25	0	0	Unaccommodated Need	2.255154267	MDR	MDR	VHDR	VHDR	20	30	50	Vacant	Vacant

Appendix B-3
Land Use Table

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
RR	Rural Residential
VLDR	Very Low-Density Residential
LDR	Low-Density Residential
MDR	Medium-Density Residential
HDR	High-Density Residential
HDR-20/AHO	High-Density Residential

Appendix C

Affirmatively Furthering Fair Housing (AFFH)

Affirmatively Furthering Fair Housing (AFFH)

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,
- Familial¹ 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 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 information on fair housing 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.

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.

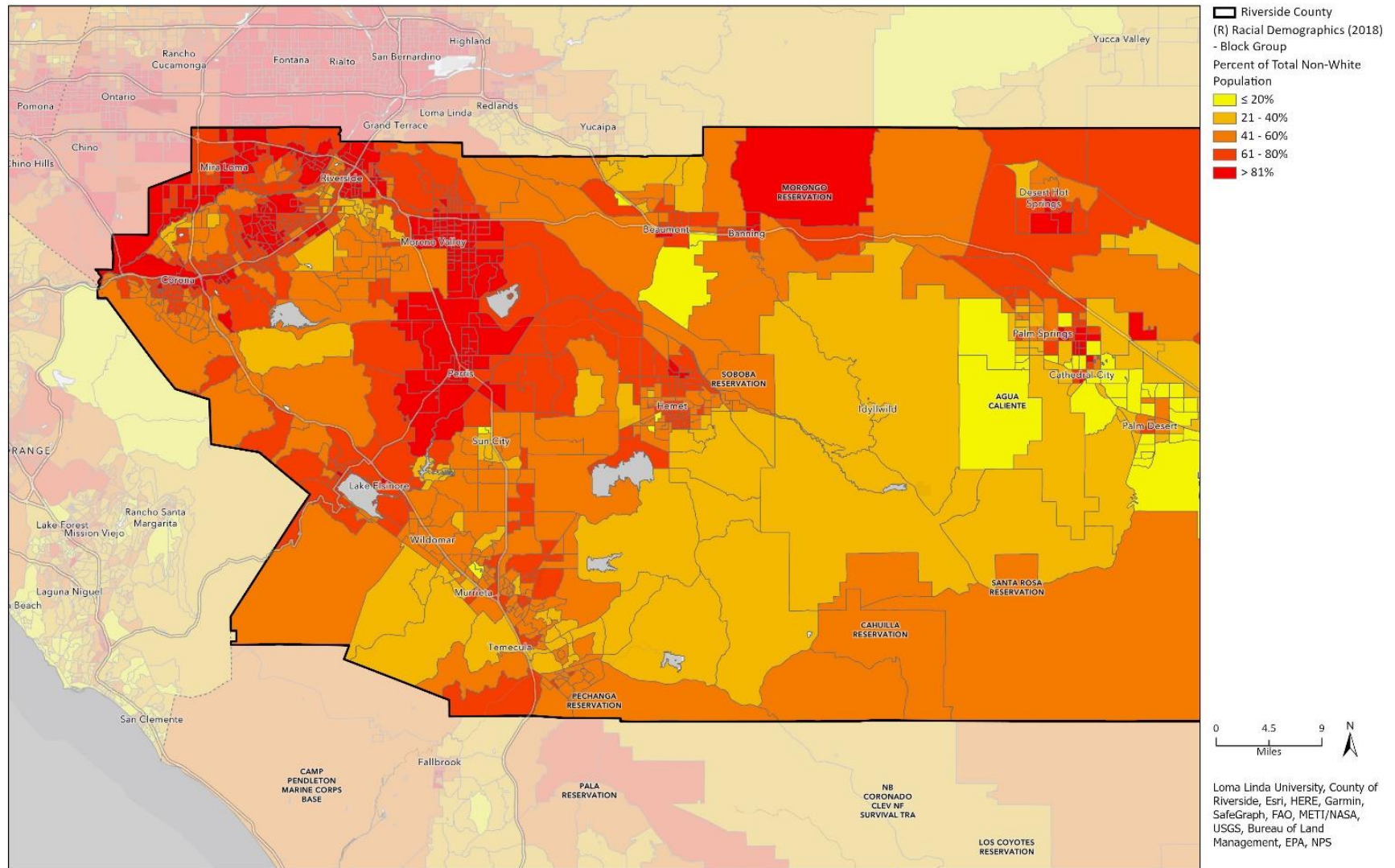
City of Banning Minority Concentrated Areas

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).

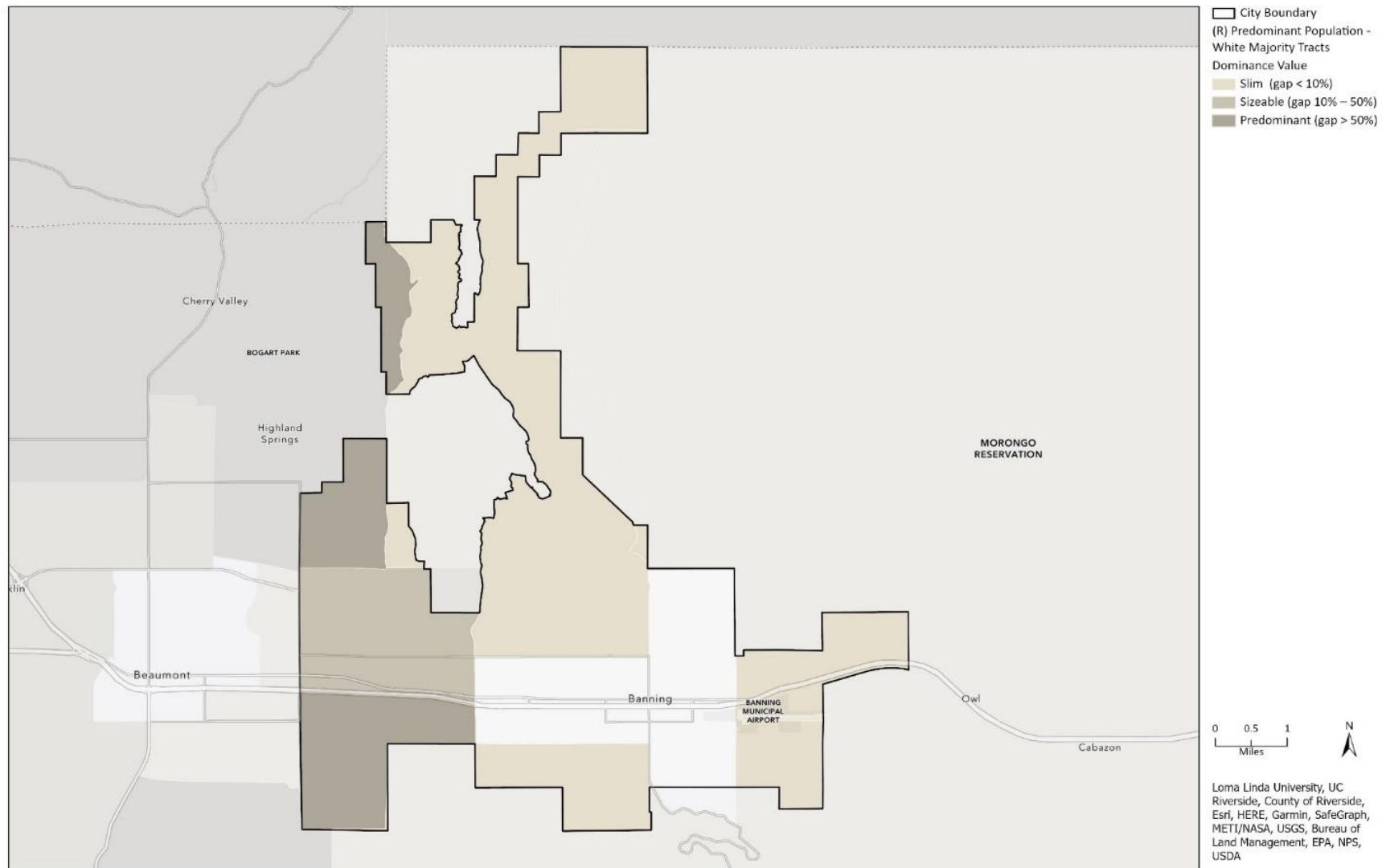
Figure 2 displays areas where white non-Hispanic population comprise the largest demographic throughout the City of Banning, whereas Figure 3 shows areas that are predominately Hispanic areas. According to the AFFH Viewer, areas located near the Banning Municipal Airport and south of the city near Banning 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 1 Minority Concentrated Areas (County of Riverside)



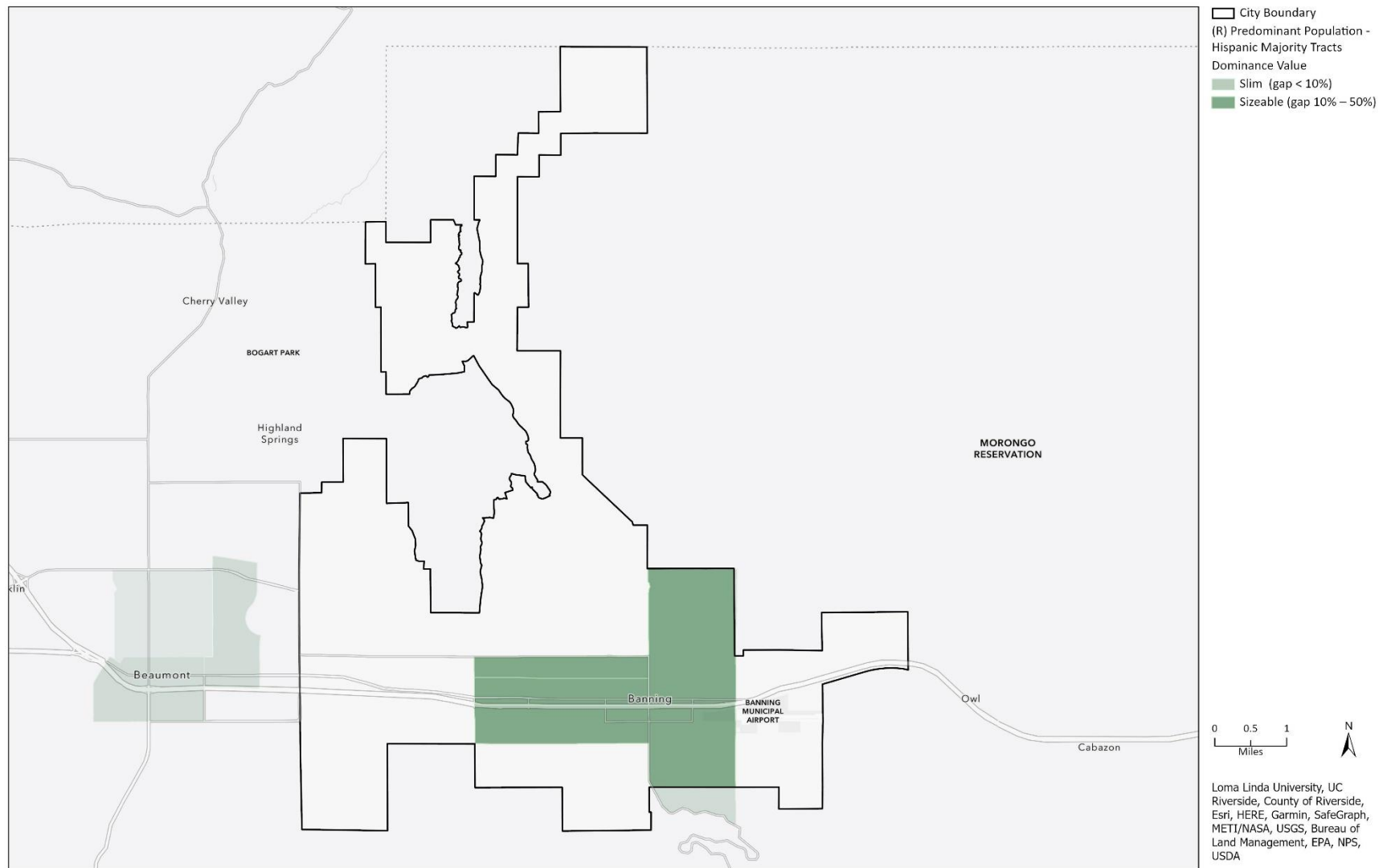
Source: AFFH Data Viewer, 2021

Figure 2 Predominant Population – White (City of Banning)



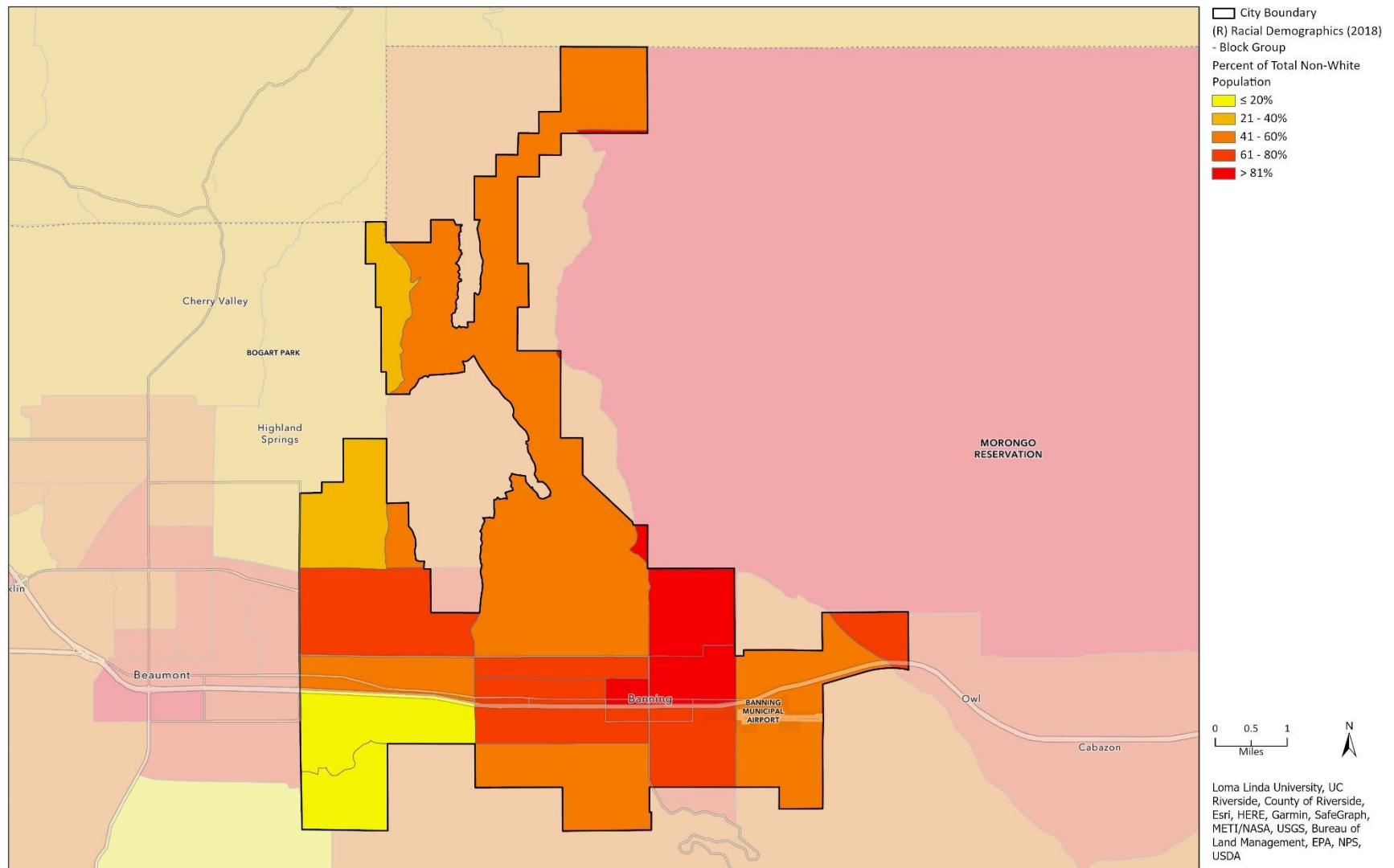
Source: AFFH Data Viewer, 2021

Figure 3 Predominant Population- Hispanic (City of Banning) Source: AFFH Data Viewer, 2021



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 ranges 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.

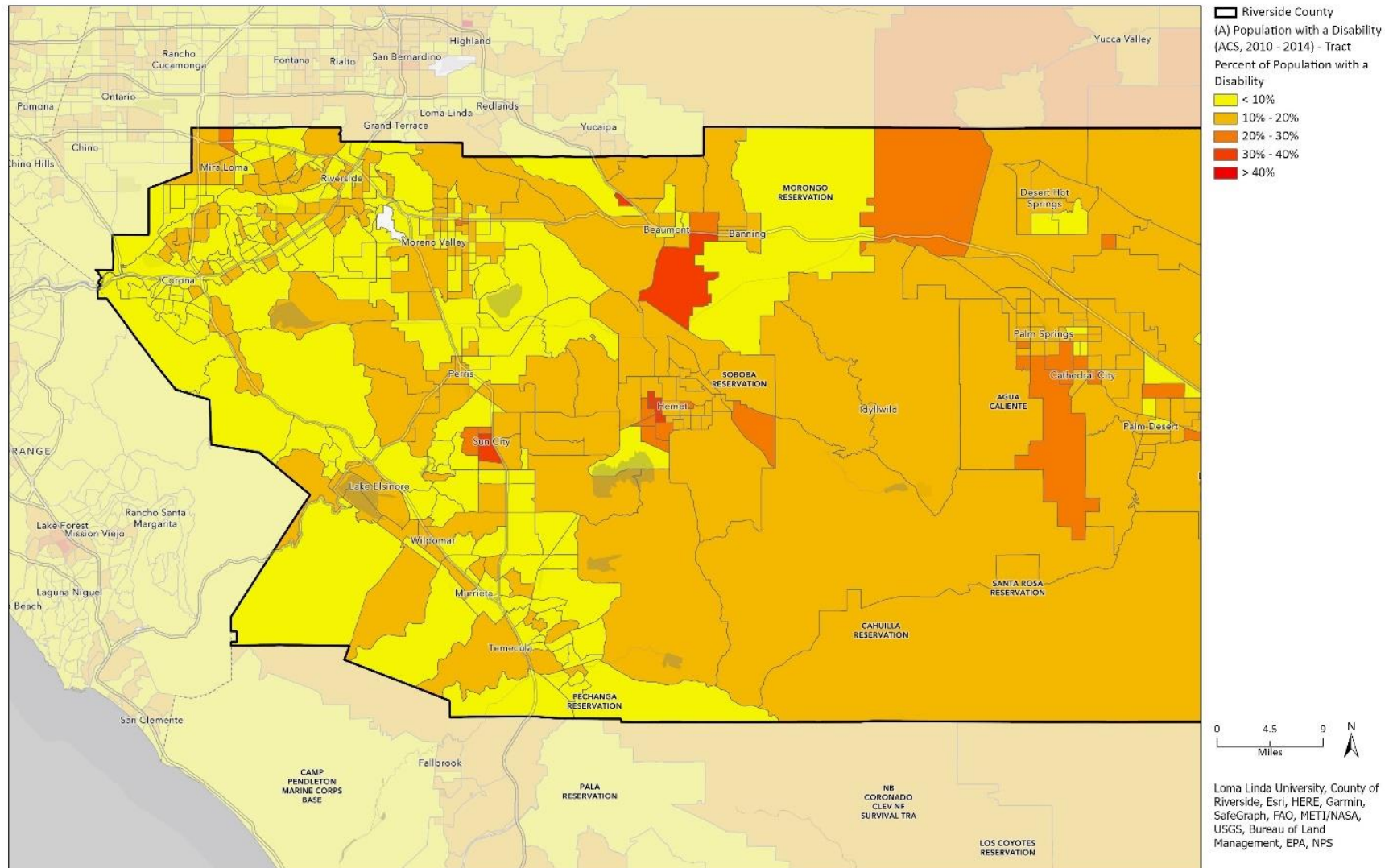
Familial Status

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.¹

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.

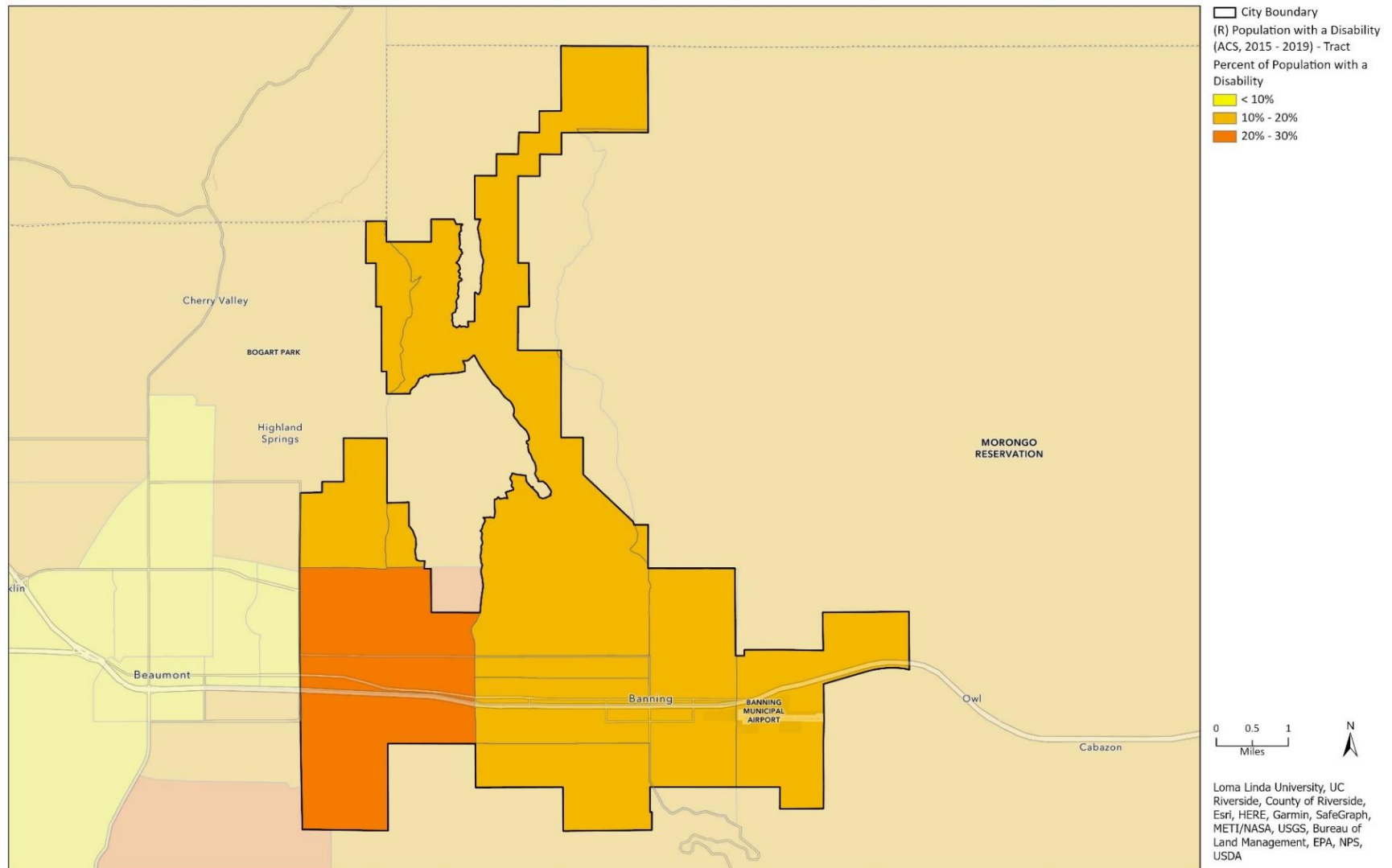
¹ Fair Housing: Equal Opportunity for All: https://www.hud.gov/sites/documents/FHEO_BOOKLET_ENG.PDF

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

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

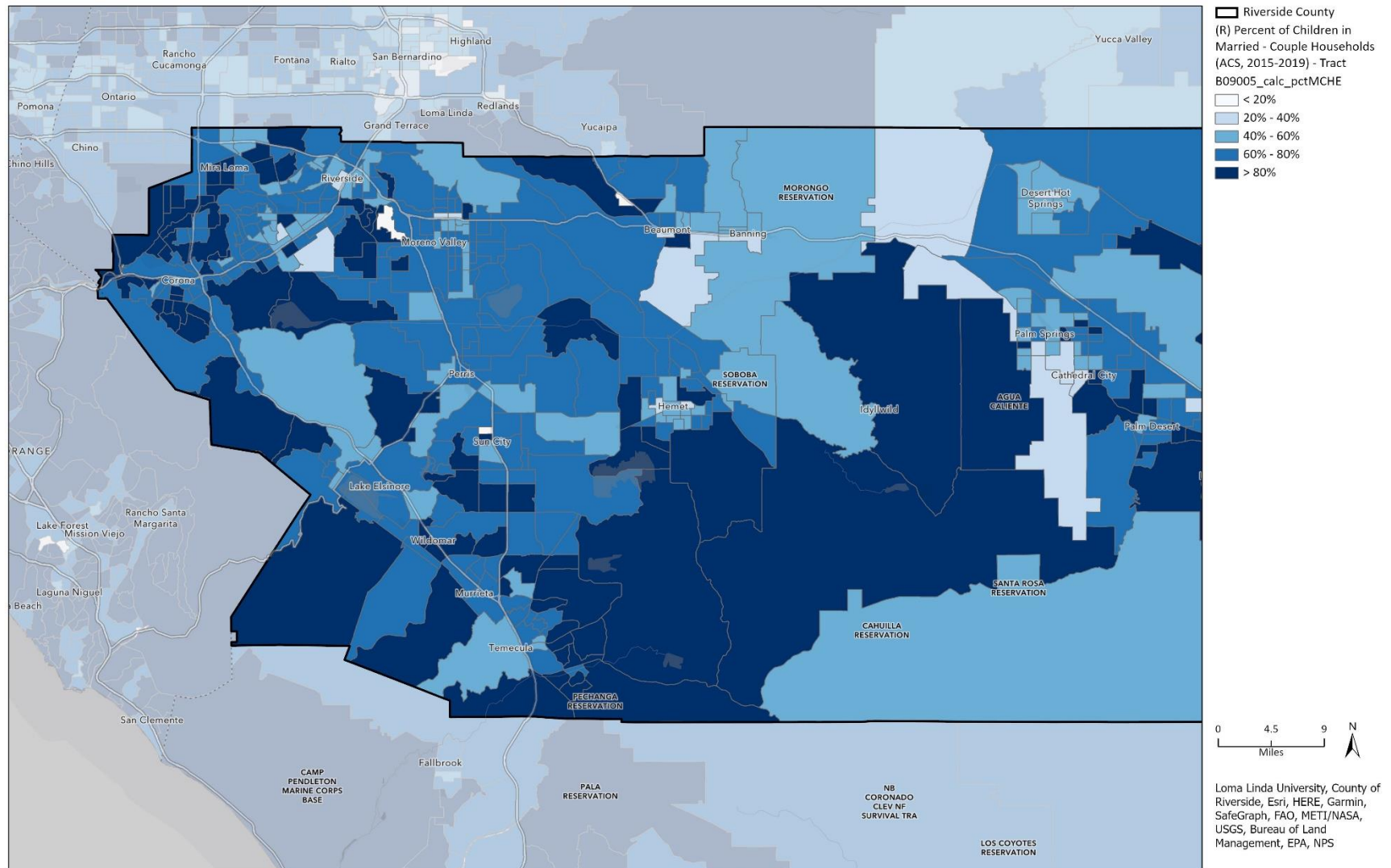
Between 2010 and 2018, variation between household types in Banning has generally increased. According to 2018 ACS estimates, almost one-third of households in the city are single-person households, and families with children comprise less than one quarter of total households. Senior-headed households 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 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)

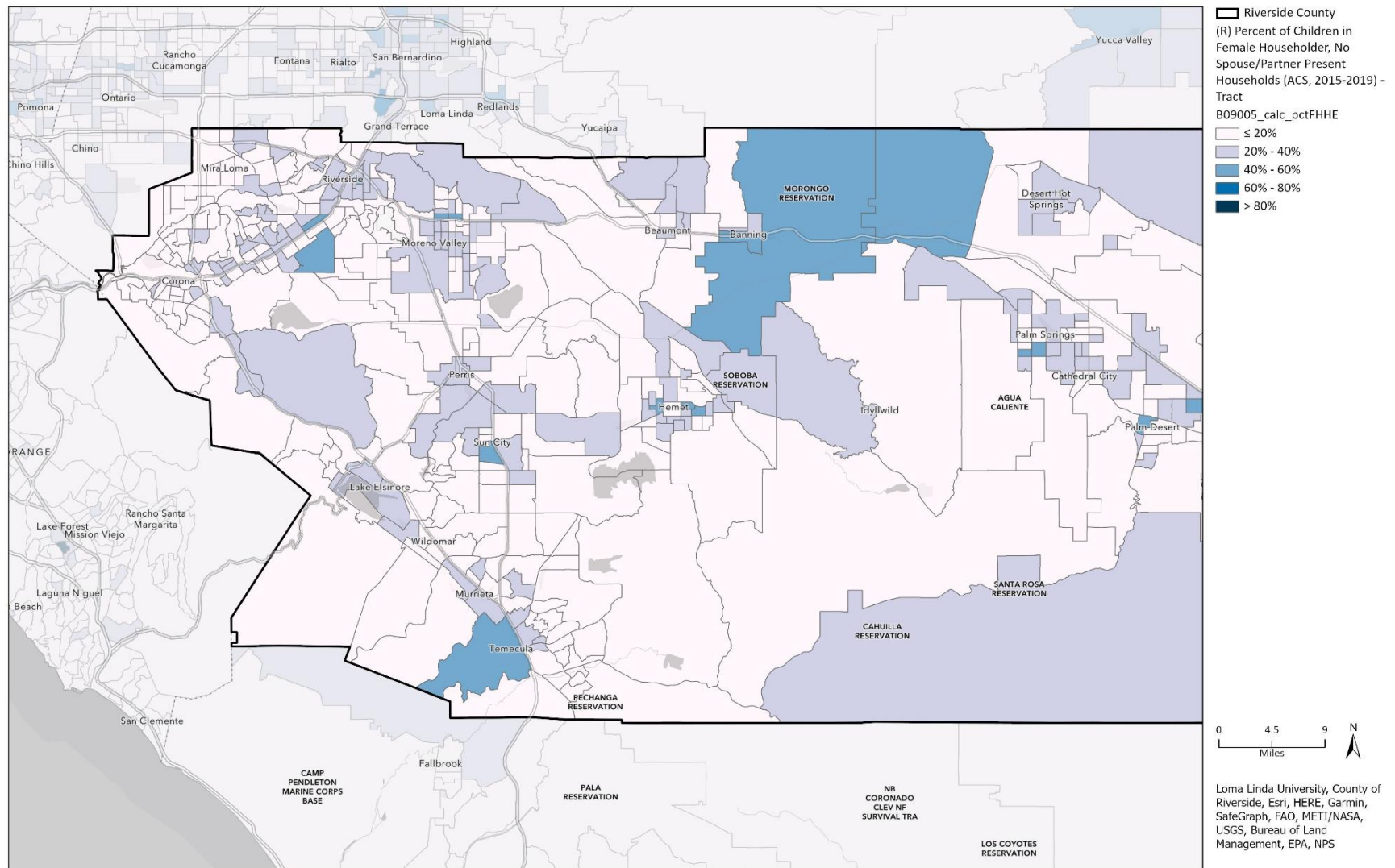
Household Type	2010		2018		Percent Change in Share of Households 2010-2018
	Number	Percent of Households	Number	Percent of Households	
Single-Person Households	3,724	31.3	3,386	31.1	-0.2
Senior-Headed Households	2,195	18.4	2,421	22.2	3.8
Families with Children	2,625	22.1	2,547	23.4	1.3
Single-Parent 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)

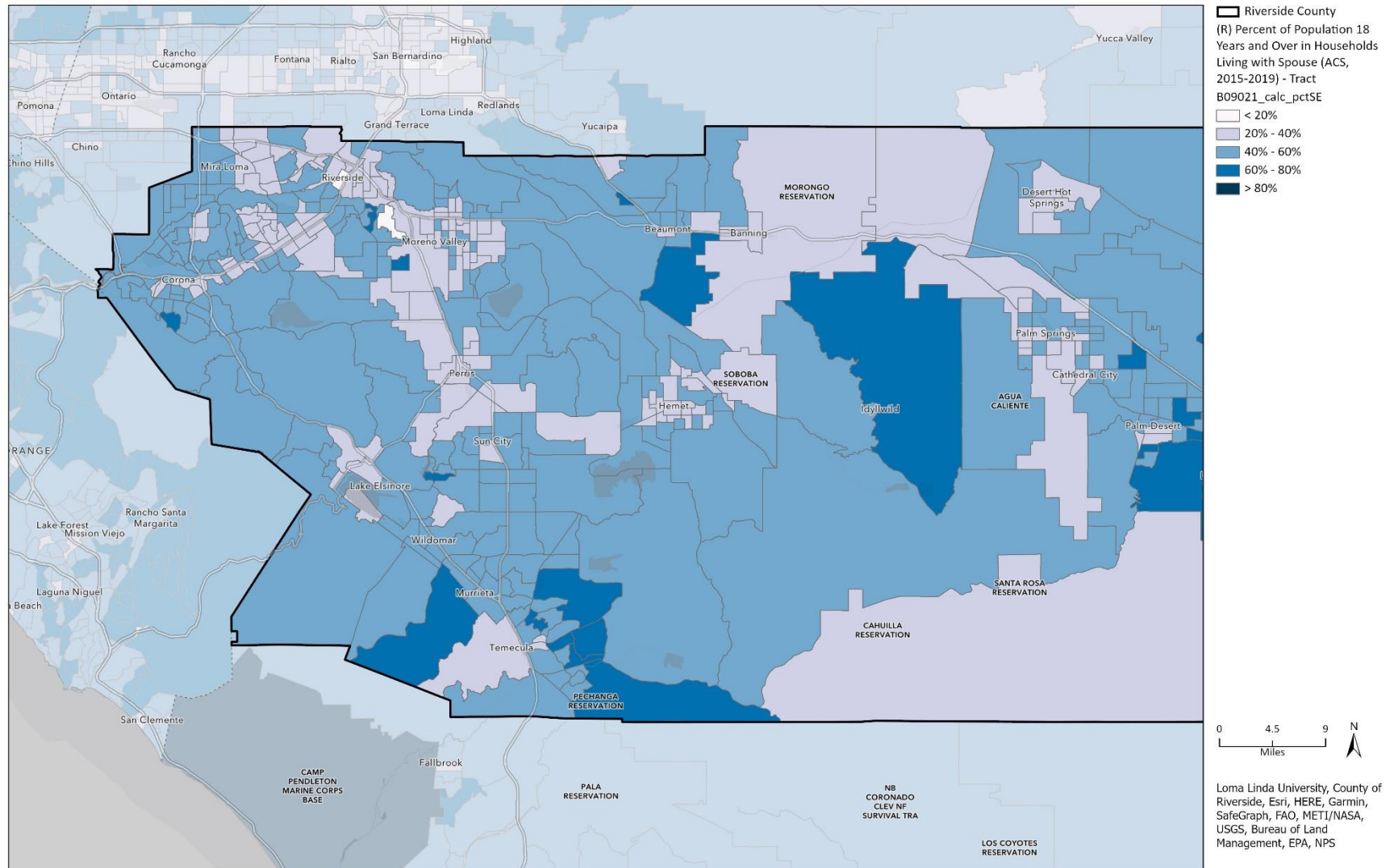


Source: AFFH Data Viewer, 2021

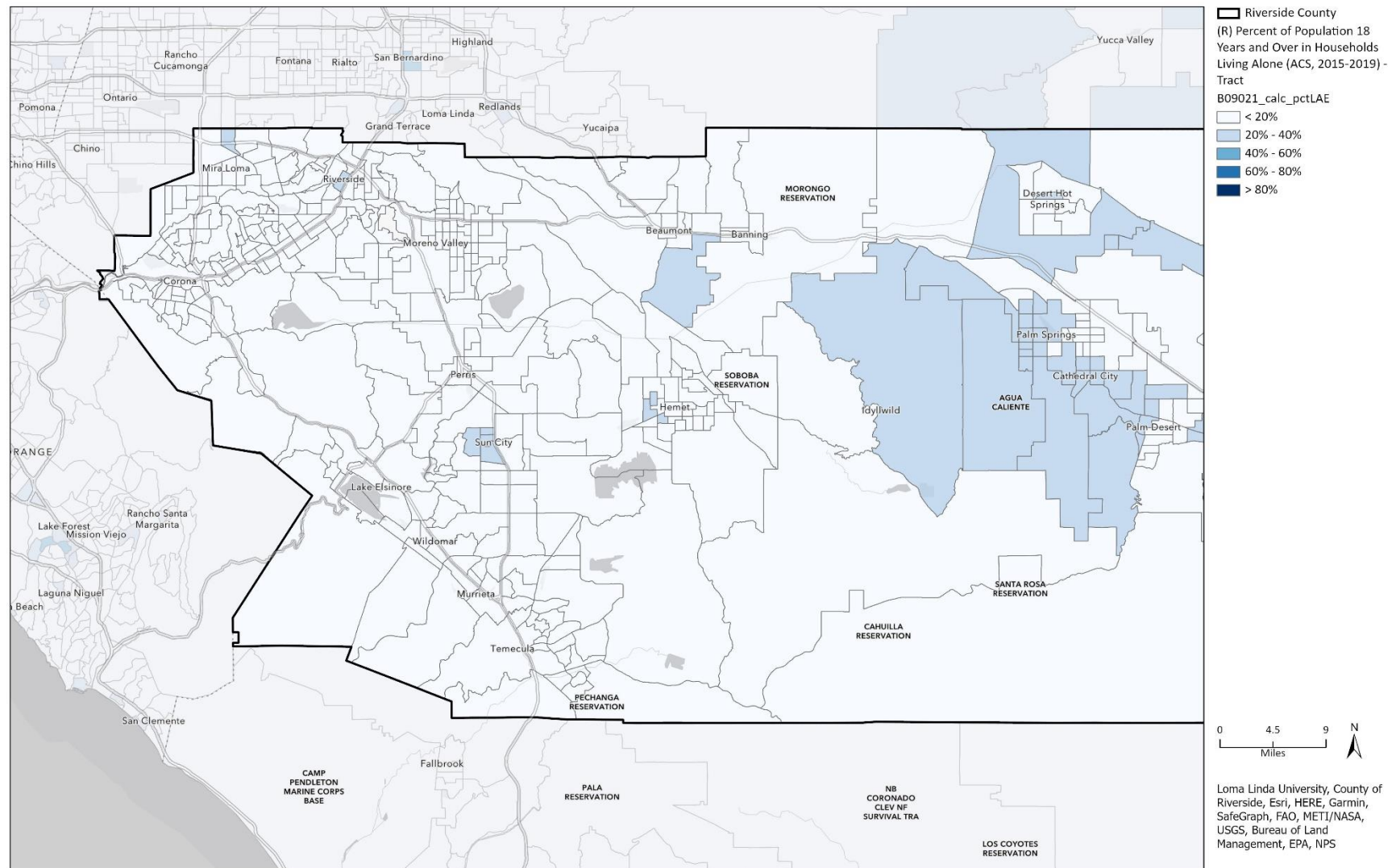
Figure 8 Female Headed Households with Children, No Spouse/Partner Present (County of Riverside)

Source: AFFH Data Viewer, 2021

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

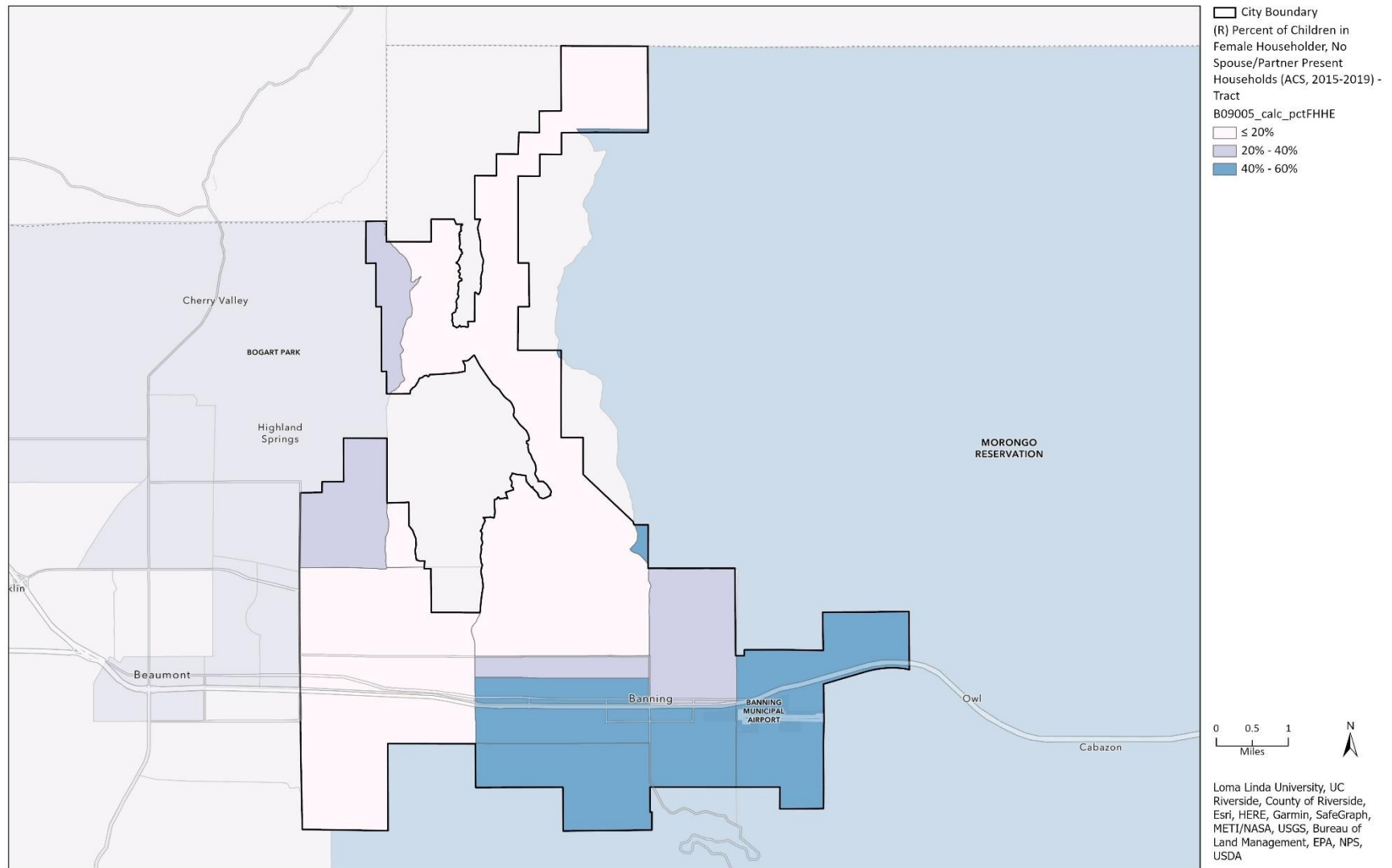


Source: AFFH Data Viewer, 2021

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.

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.

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 Geronimo 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.

Concentrated Areas of Affluence

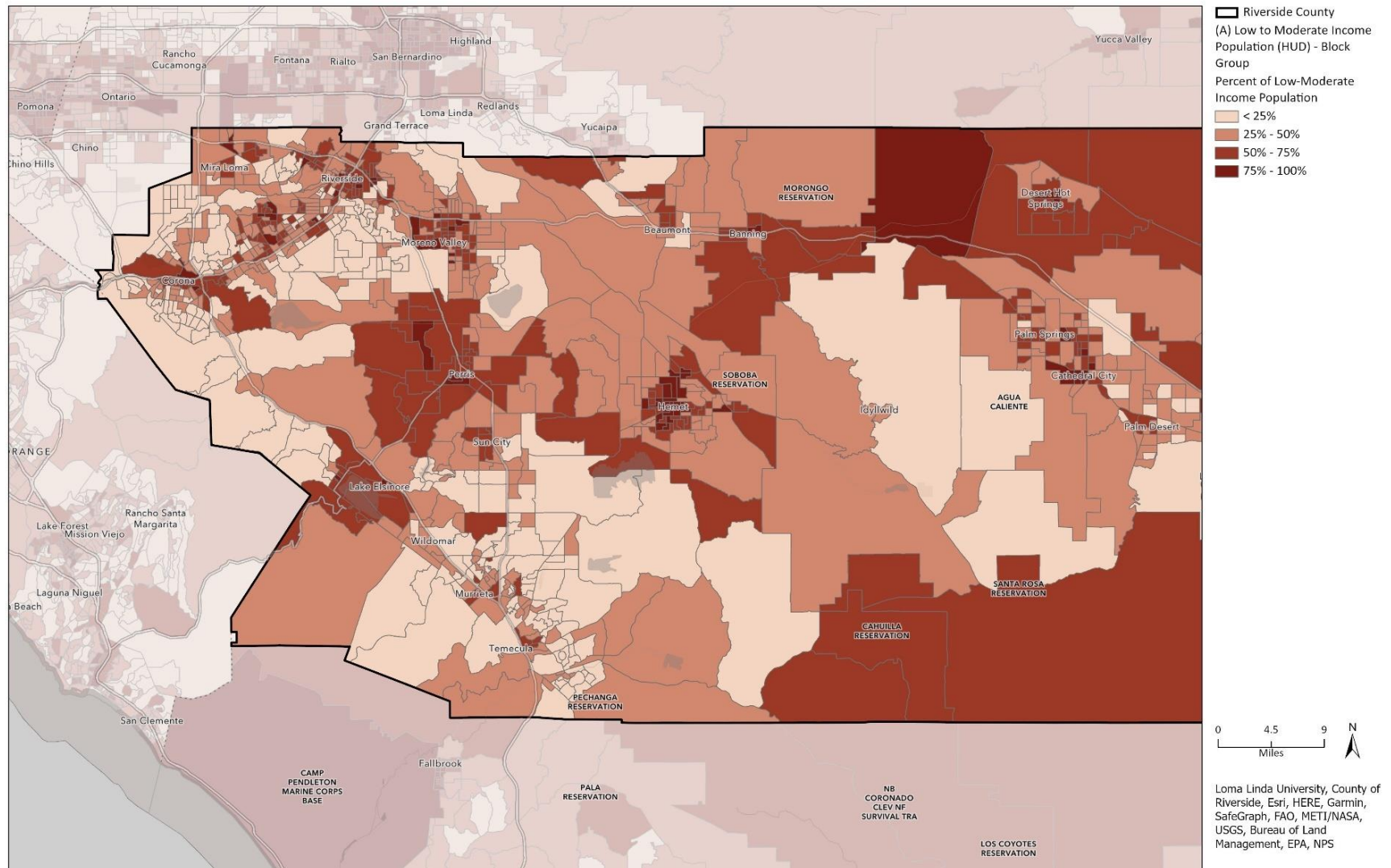
While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated. According to a policy paper published by HUD, RCAA is defined as affluent, white communities.² According to HUD's policy paper, "White 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

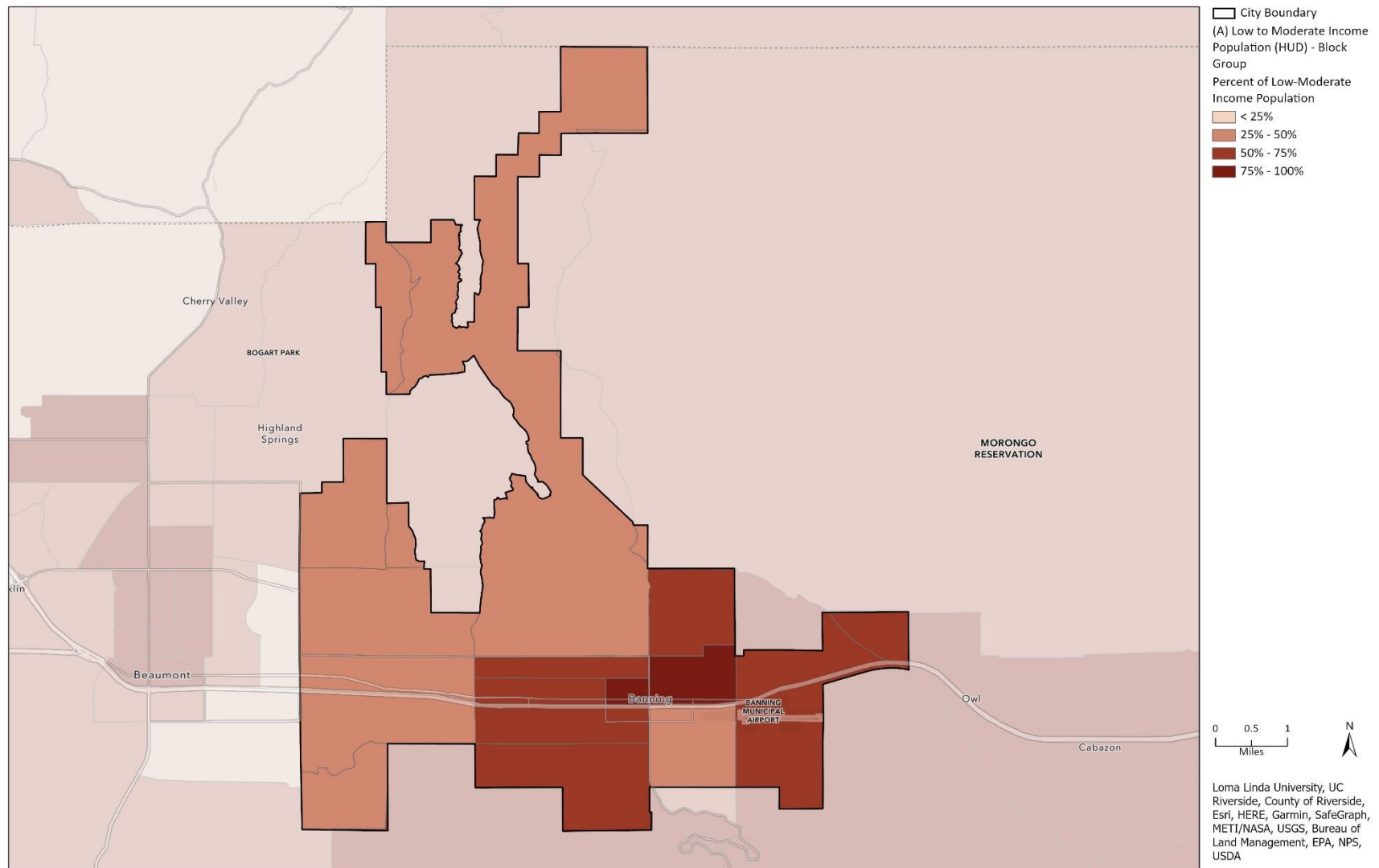
As stated above in the discussion on Income, the median household income in the county was \$63,948, compared to \$42,274 in Banning. As shown on Figure 18, median incomes are generally highest in the western portion of the county, where community populations are larger and denser. Though there isn't 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.

² 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 12 LMI Areas (County of Riverside)

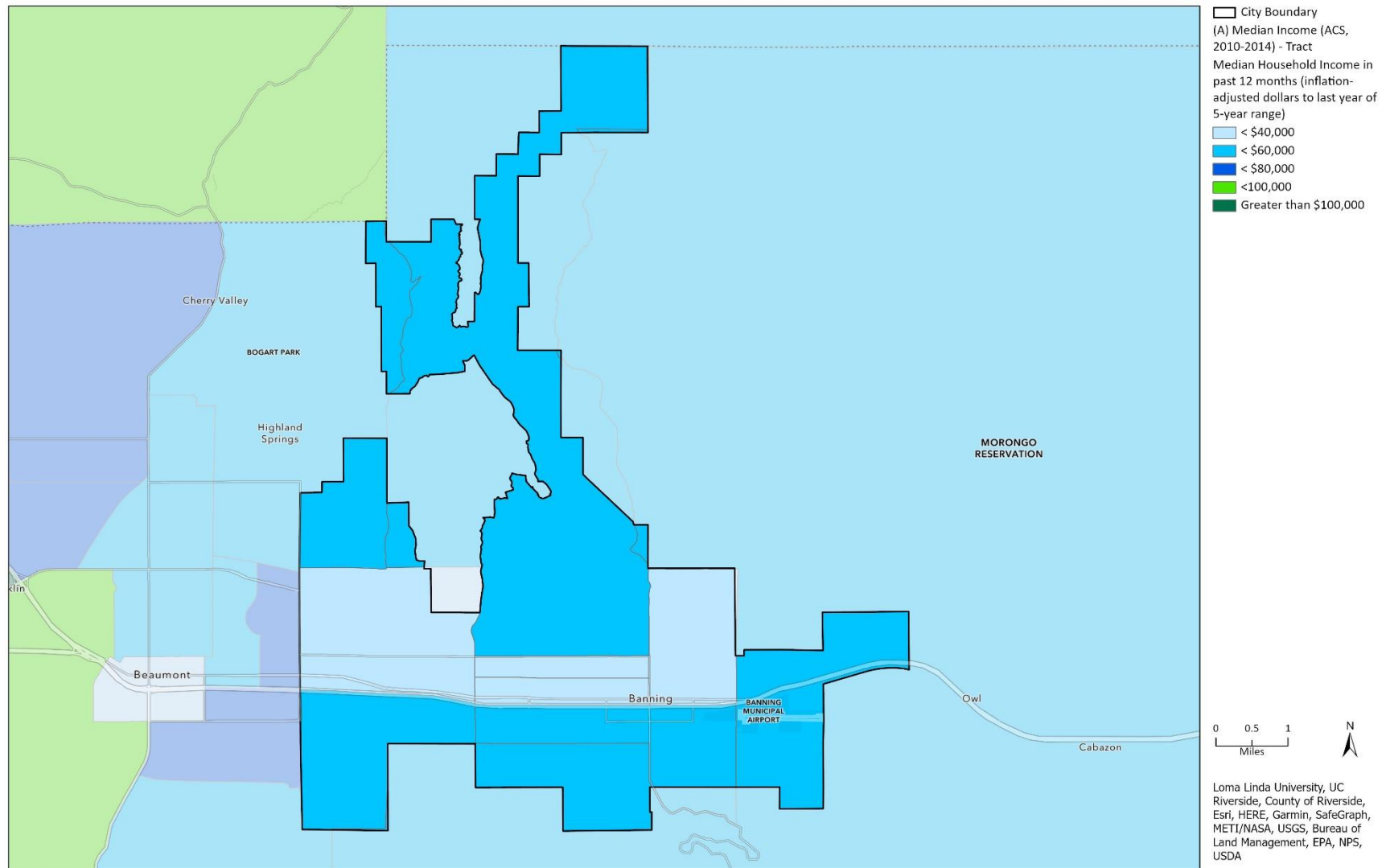


Source: AFFH Data Viewer, 2021

Figure 13 LMI Areas (City of Banning)

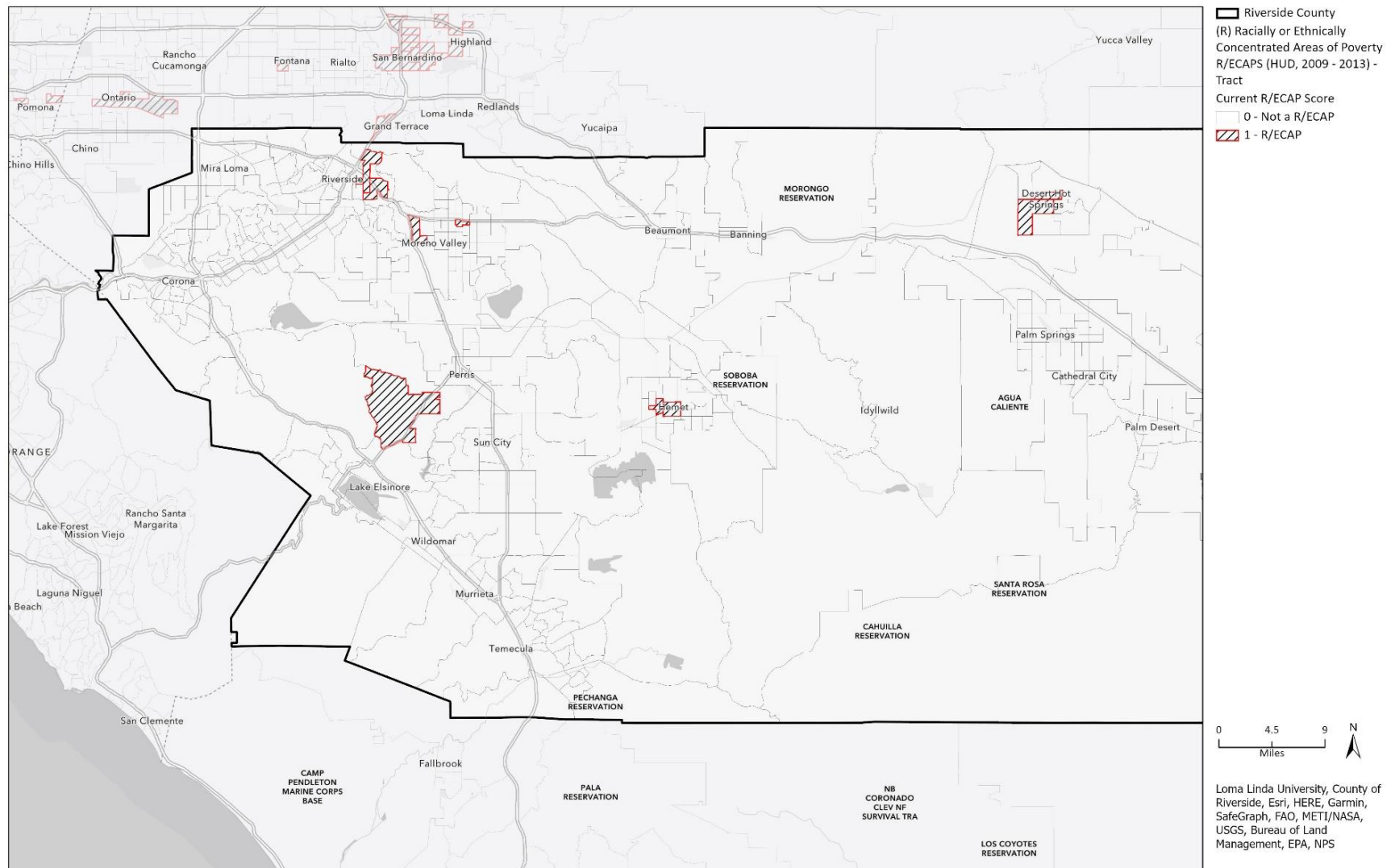
Source: AFFH Data Viewer, 2021

Figure 14 Median Household Income (City of Banning)



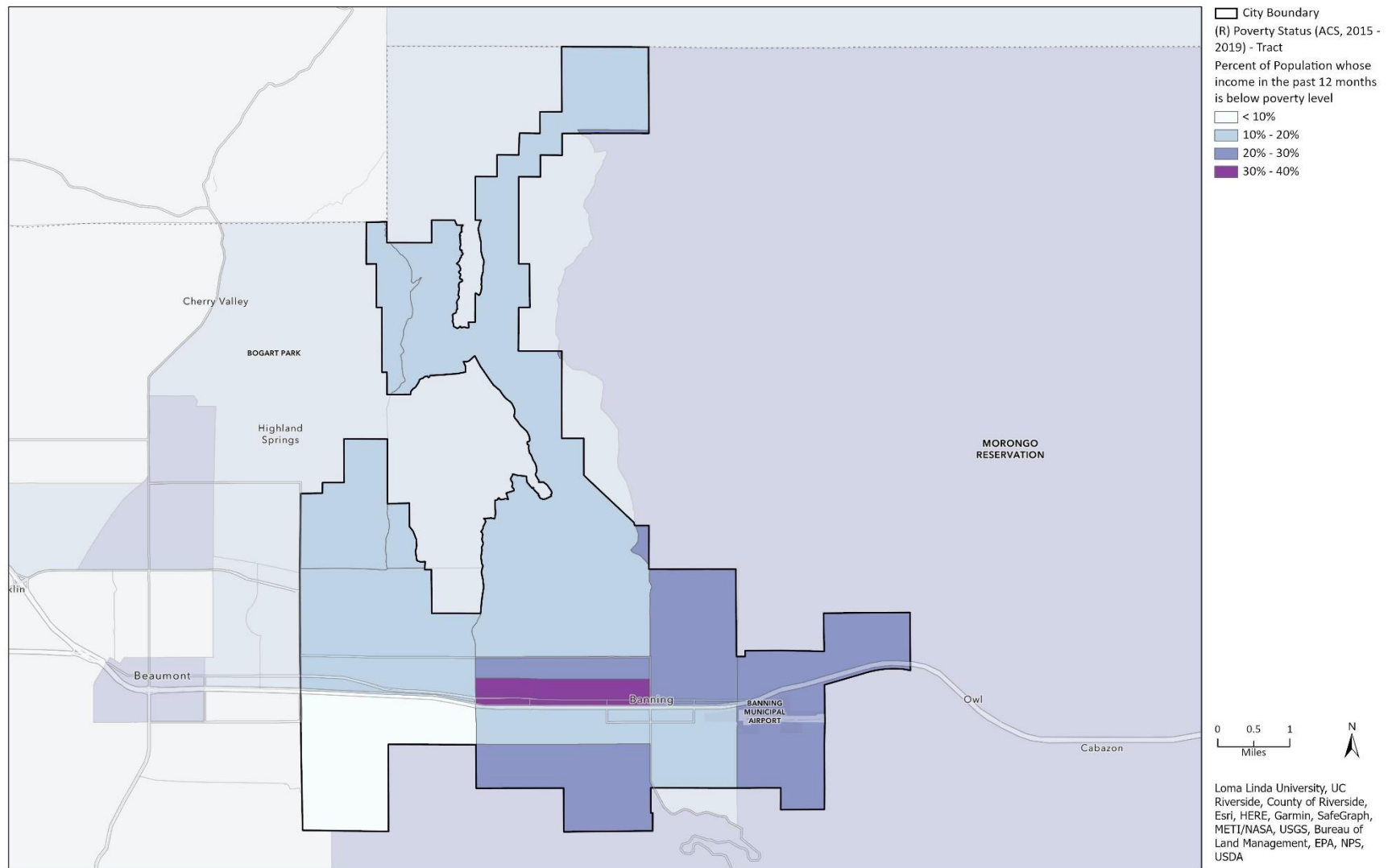
Source: AFFH Data Viewer, 2021

Figure 15 R/ECAPs (County of Riverside)

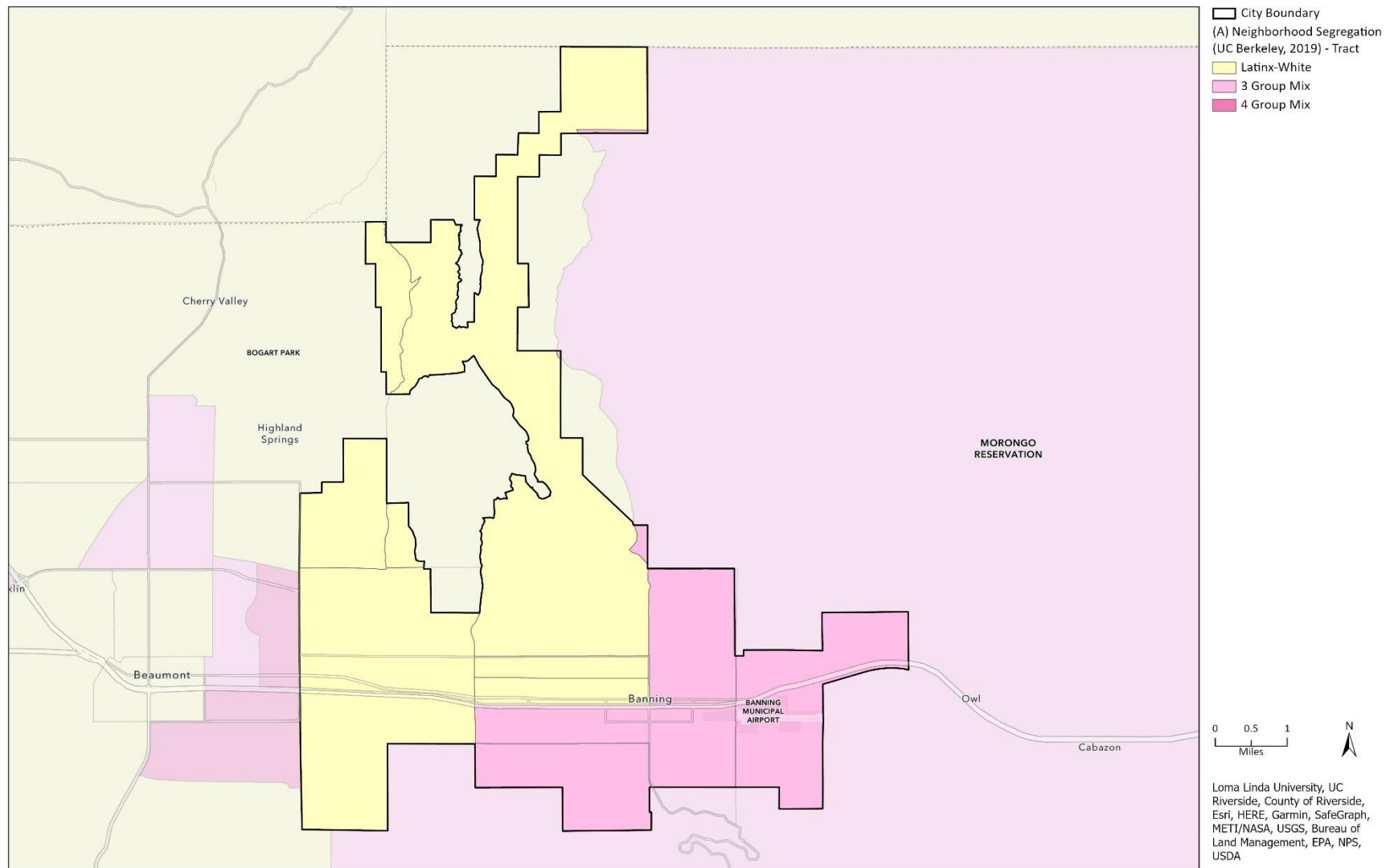


Source: AFFH Data Viewer, 2021

Figure 16 Areas of Poverty (City of Banning)

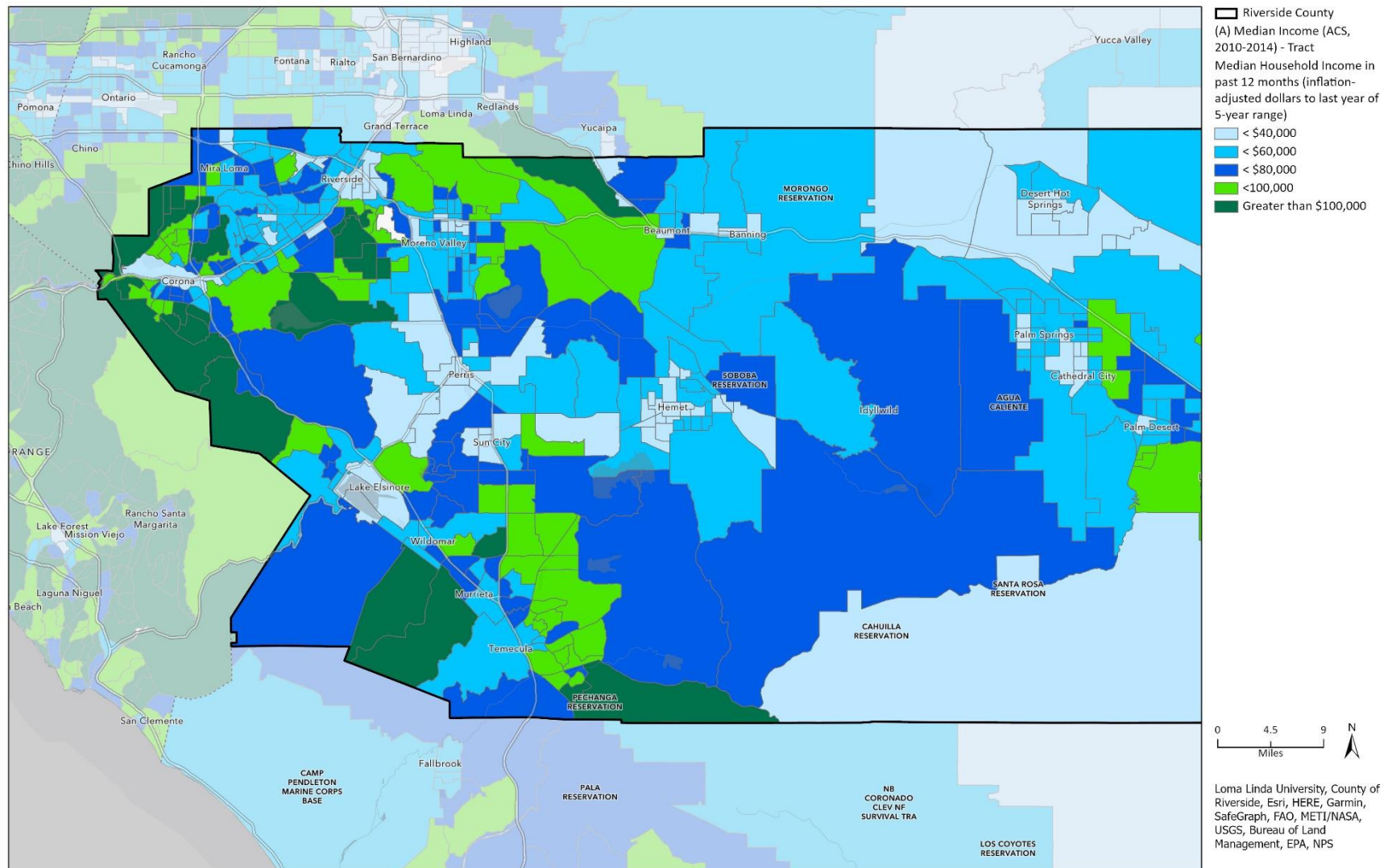


Source: AFFH Data Viewer, 2021

Figure 17 Areas of Segregation (City of Banning)

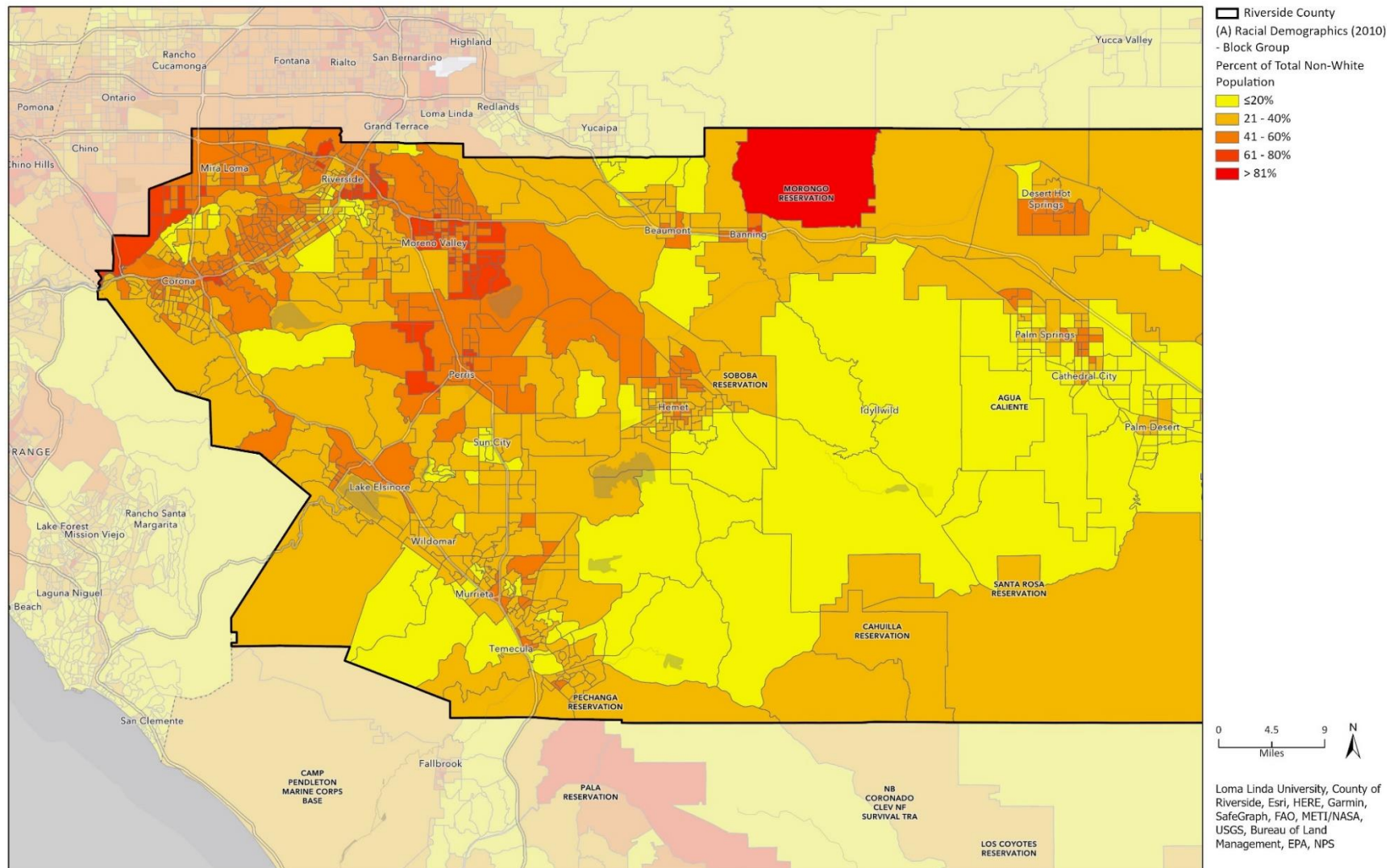
Source: AFFH Data Viewer, 2021

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 3.3.³ 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.⁴

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 2018.⁵ 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.

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

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

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

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:

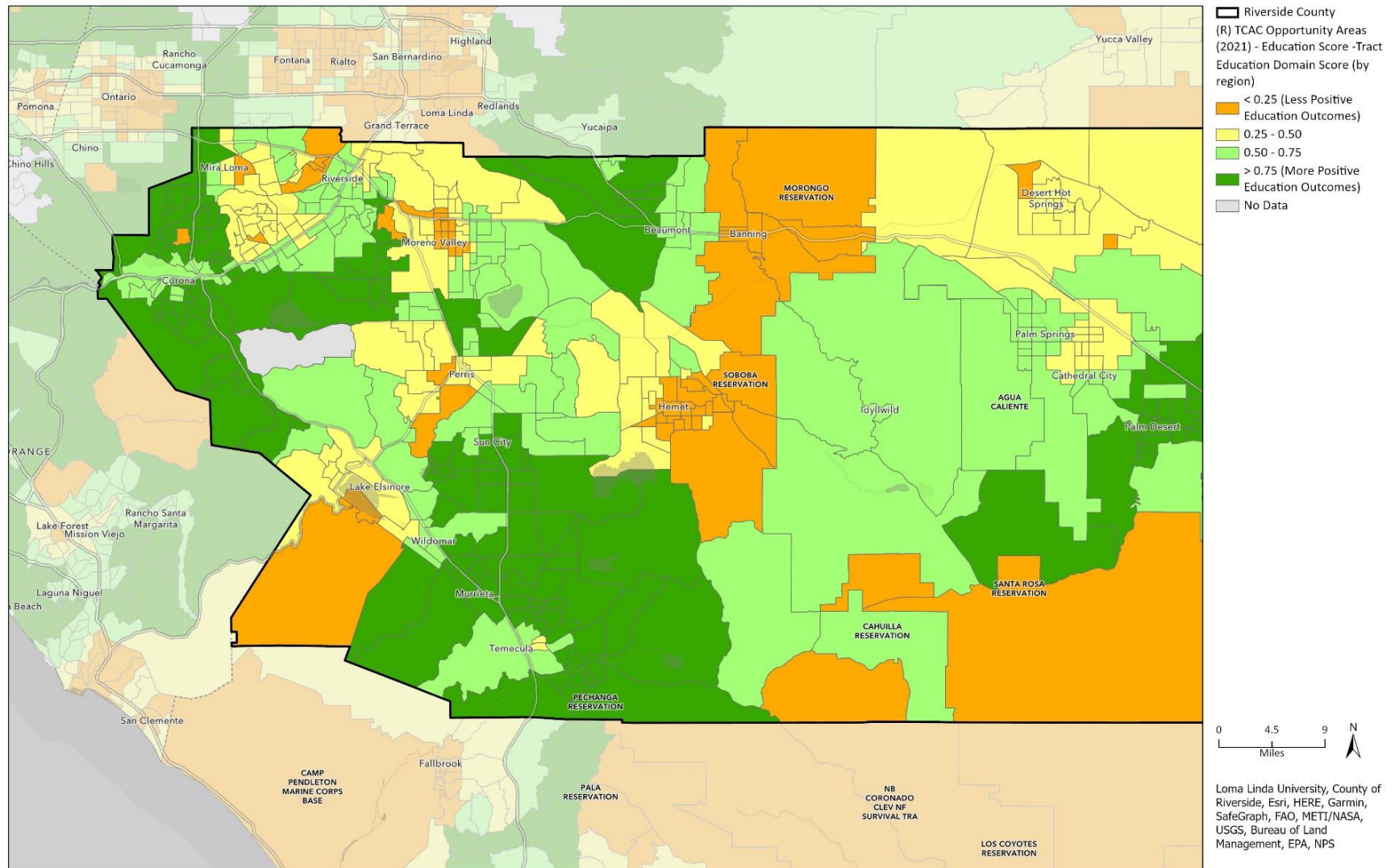
The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract" (AFFH-T Data Documentation 2017). 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.

City of Banning Trends

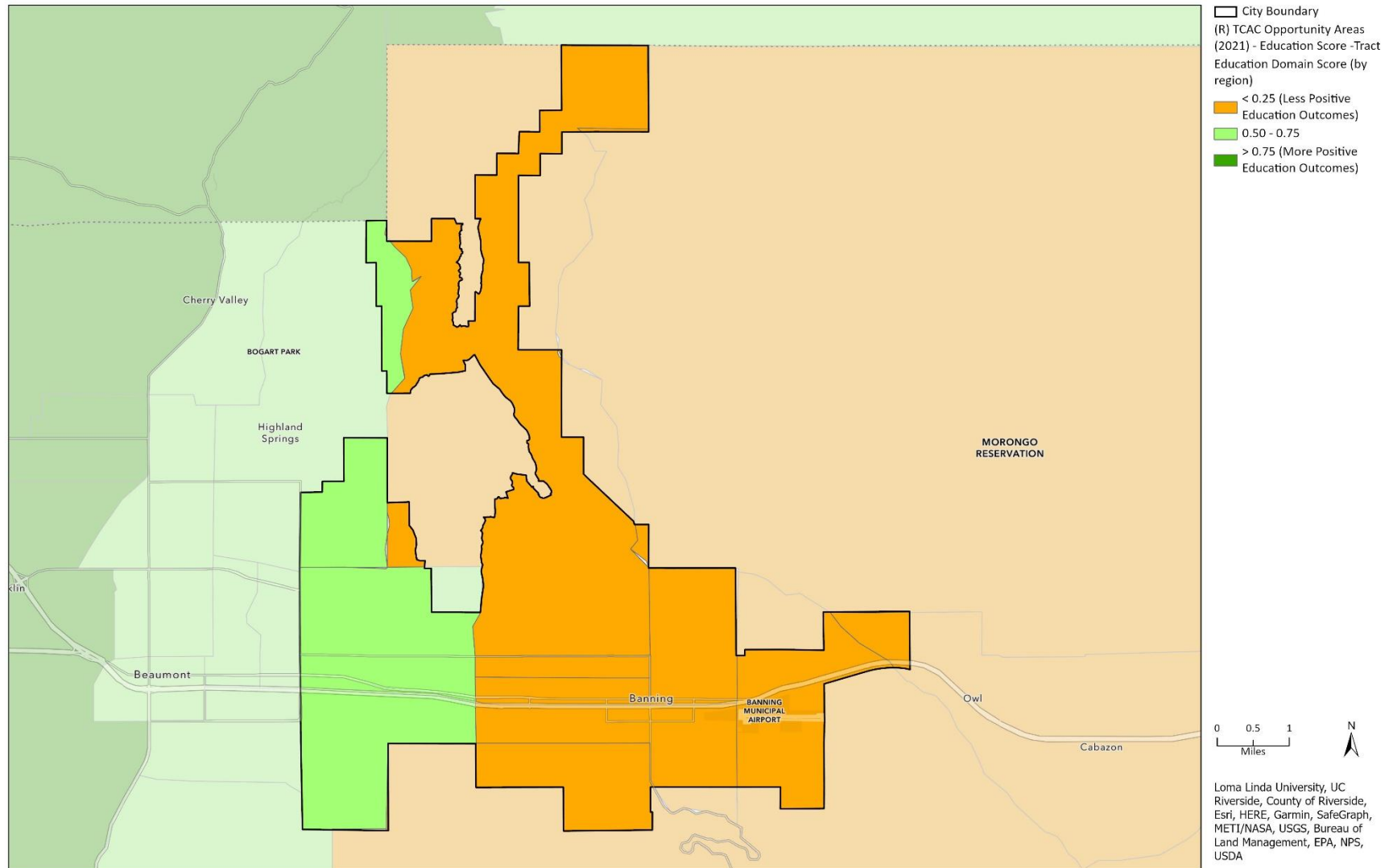
The city had 9,761 employed residents, representing a labor force participation rate of 38.7 percent of persons 16 years and over. Table 7 shows the number of persons employed in each occupation sector and the corresponding percentage of the labor force. The unemployment rate was 4.0 percent compared 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.

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



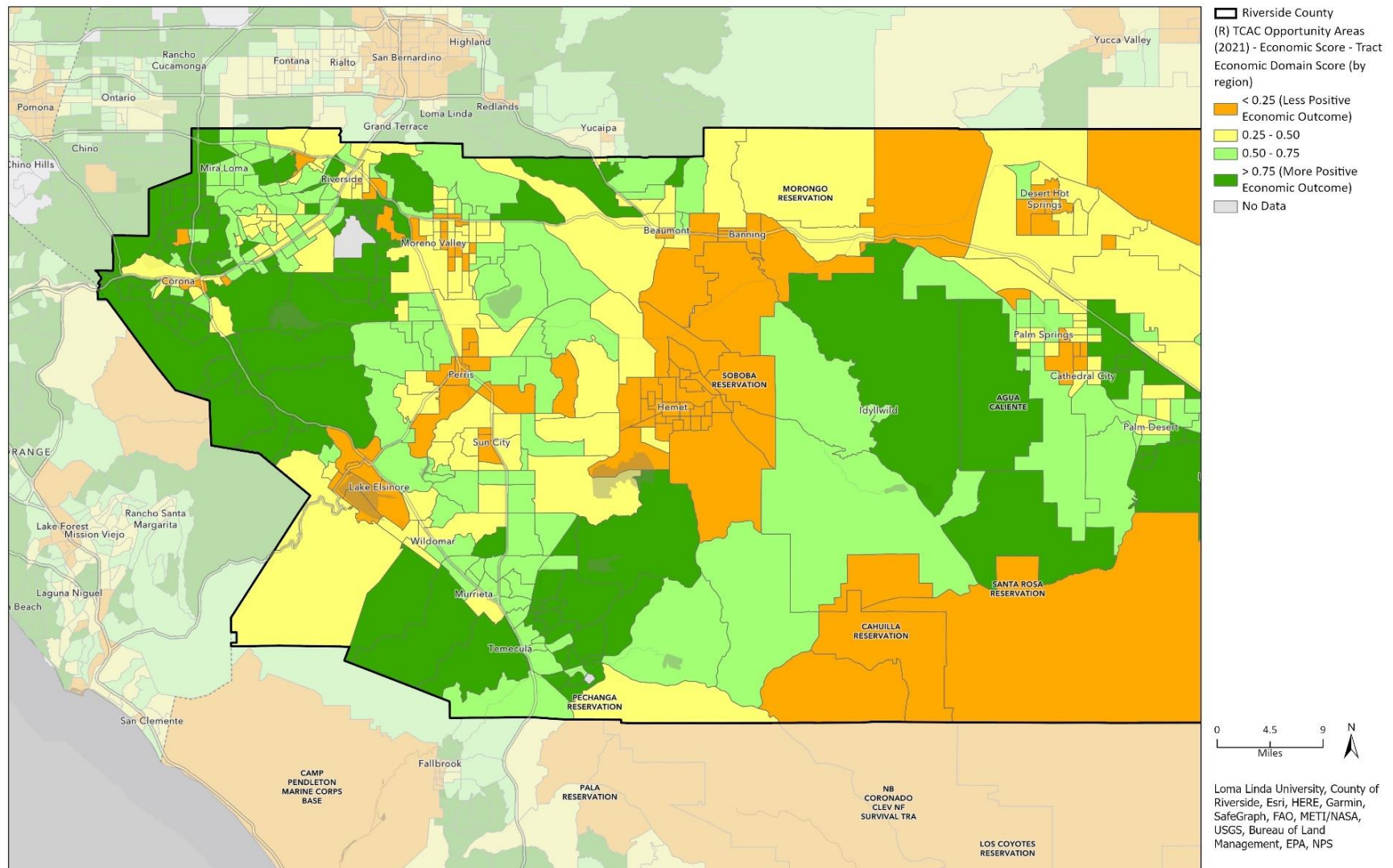
Source: TCAC/HUD, 2021

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



Source: TCAC/HUD, 2021

Figure 22 TCAC Opportunity Areas of Economic Outcomes (County of Riverside)



Source: TCAC/HUD, 2021

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
Total Employed Population	9,761	100

Totals may not add up due to rounding.

Source: American Community Survey 2015-2019

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 Government
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
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.

Healthy Environment

Access to a healthy environment is necessary for communities to thrive. Healthy Environment in AFFH addresses patterns in the disparities found within different neighborhoods and protected area groups. Disparities can vary from air quality, water quality, safe neighborhood, environmental hazards, social services, and cultural institutions. 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, taking into account socioeconomic characteristics and underlying health status.

County of Riverside Trends

The County's overall CalEnviroScreen map identifies pollution and hazardous areas. CalEnviroScreen reports scores as percentiles to compare tracts.

Figure 25 shows the more urbanized, western portion of the County has less positive environmental outcomes than the more rural areas of the southern and eastern portions of the County.

City of Banning Trends

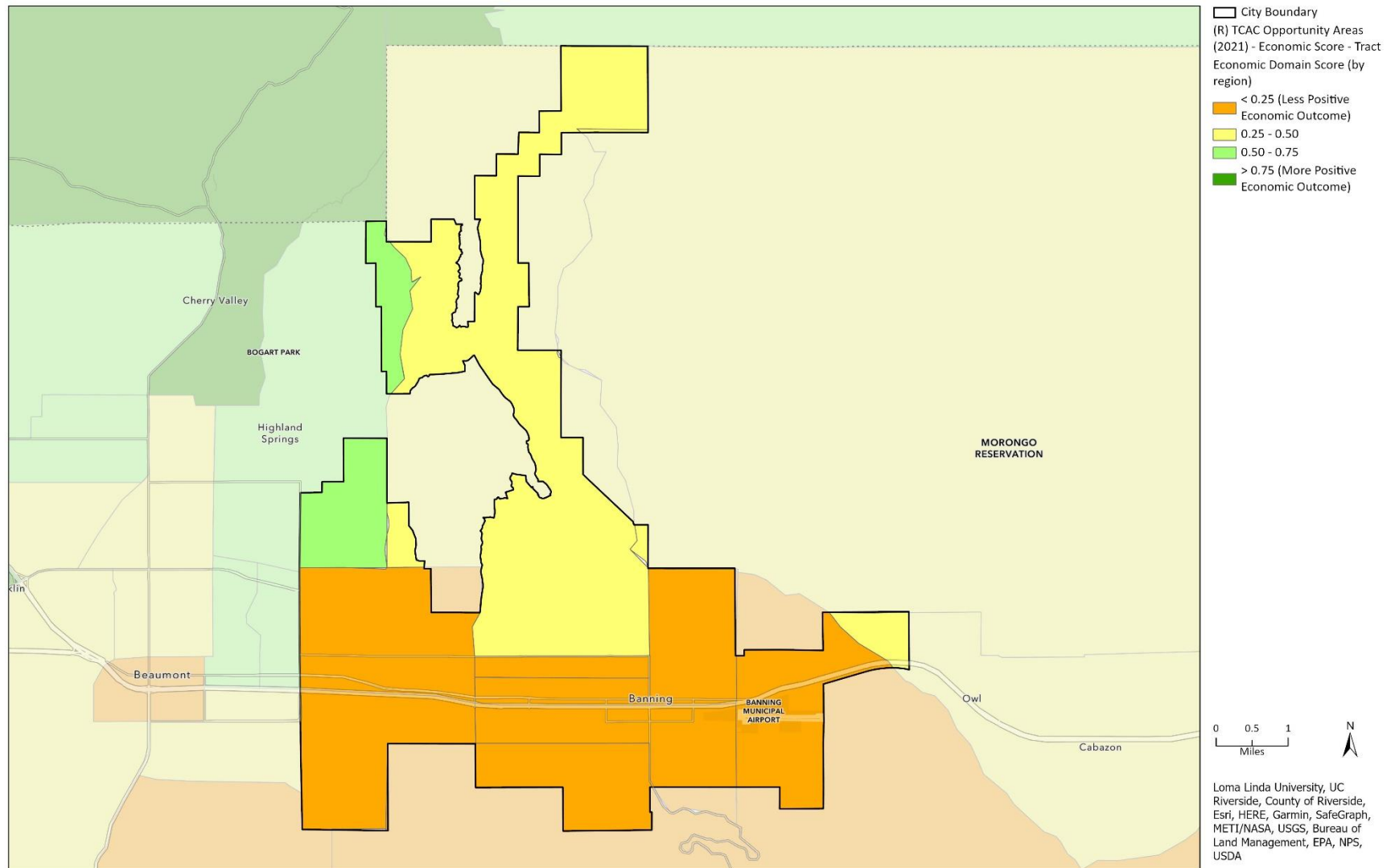
As shown in Figure 26, the City has a disparity in environmental outcomes. The southern and southeastern portions of the City have less positive environmental outcomes than the southwest and northern portions, which are further from the interstate and the airport and closer to undeveloped land. Unsurprisingly, areas close to the interstate have a high pollution burden for diesel particulate matter, ozone, and traffic.⁶ These areas also tend to have higher concentrations of poverty and racial/ethnic minorities.

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.

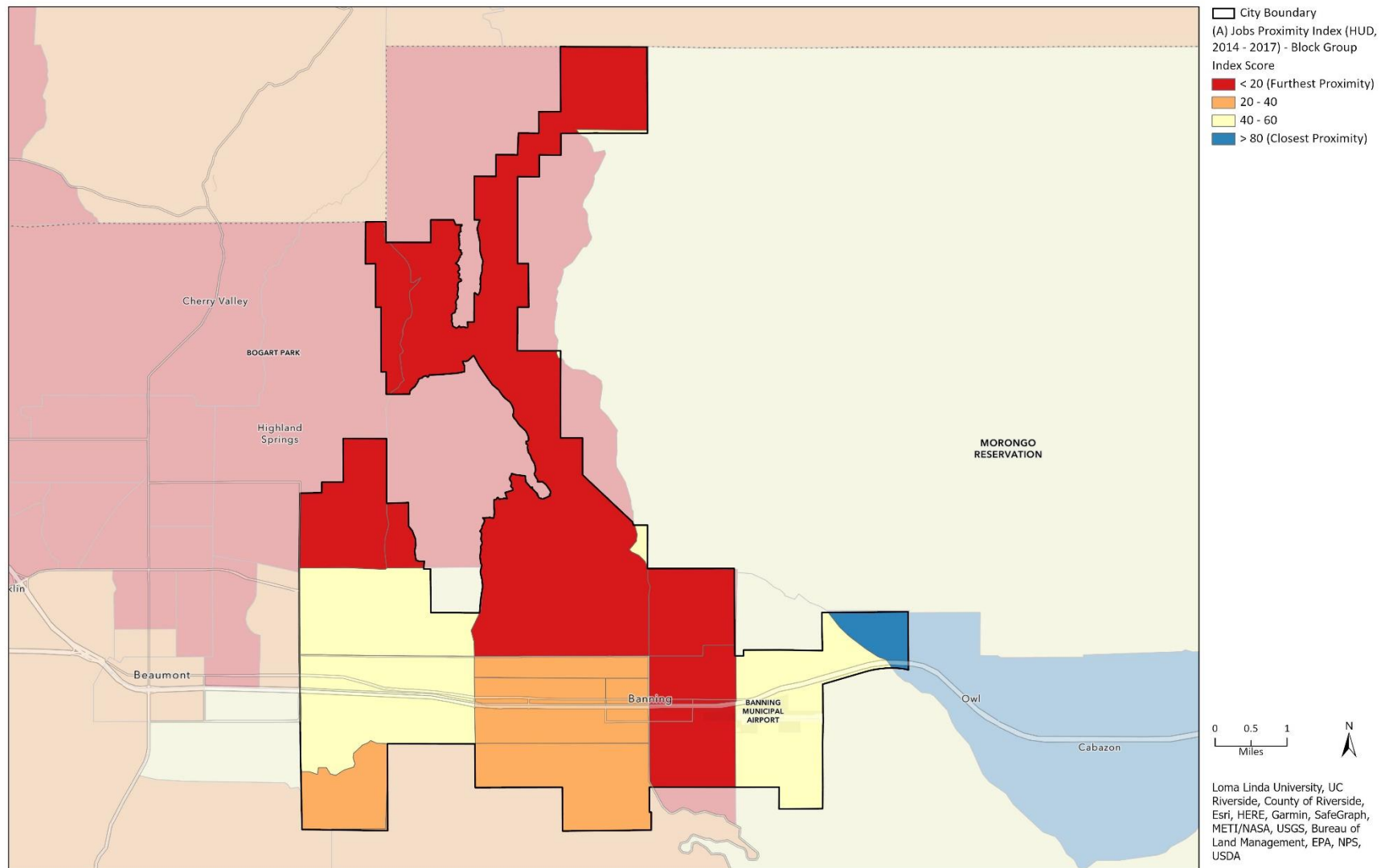
⁶ <https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-40>

Figure 23 TCAC Opportunity Areas of Economic Outcomes (City of Banning)



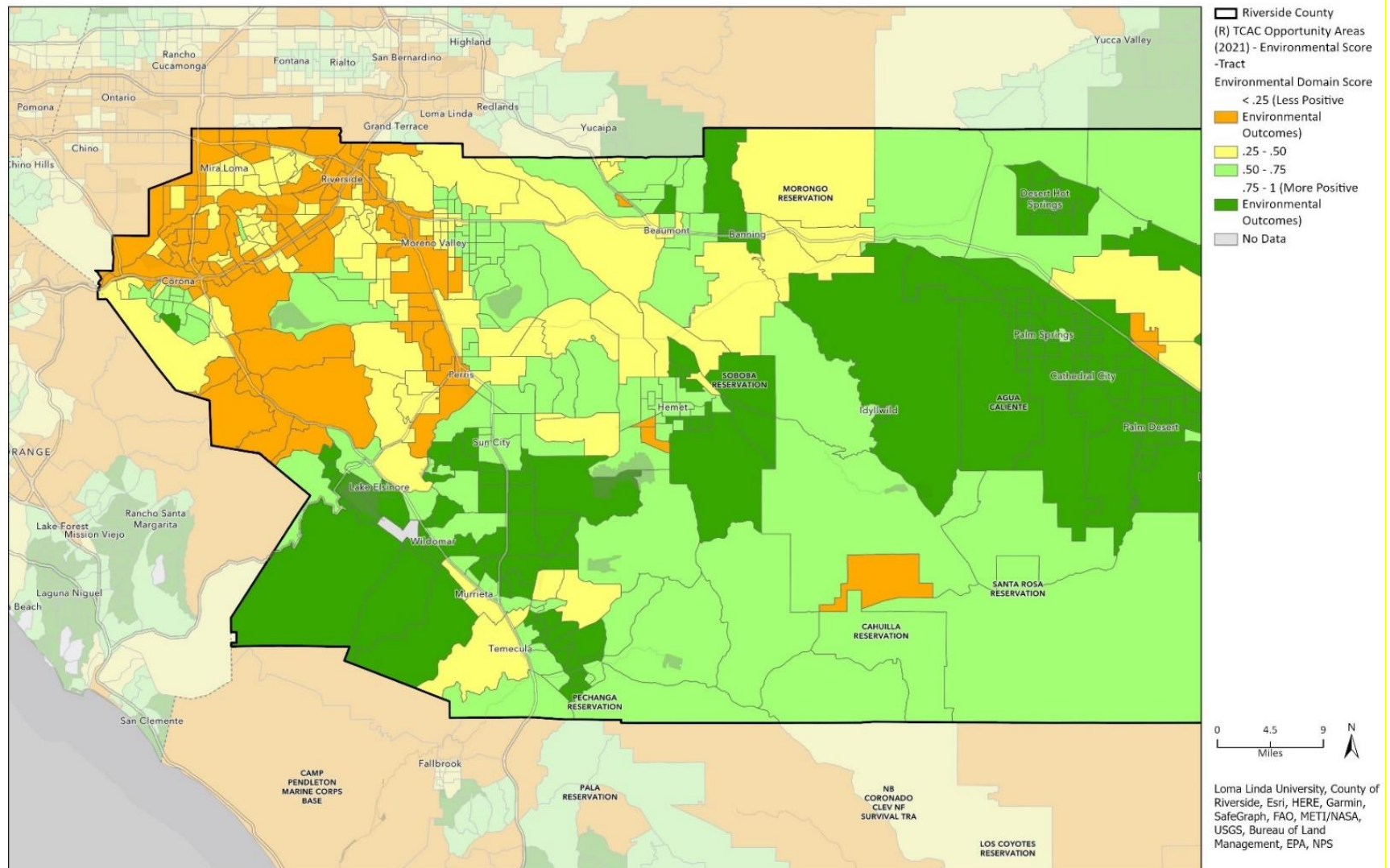
Source: TCAC/HUD, 2021

Figure 24 Job Proximity Index (City of Banning)



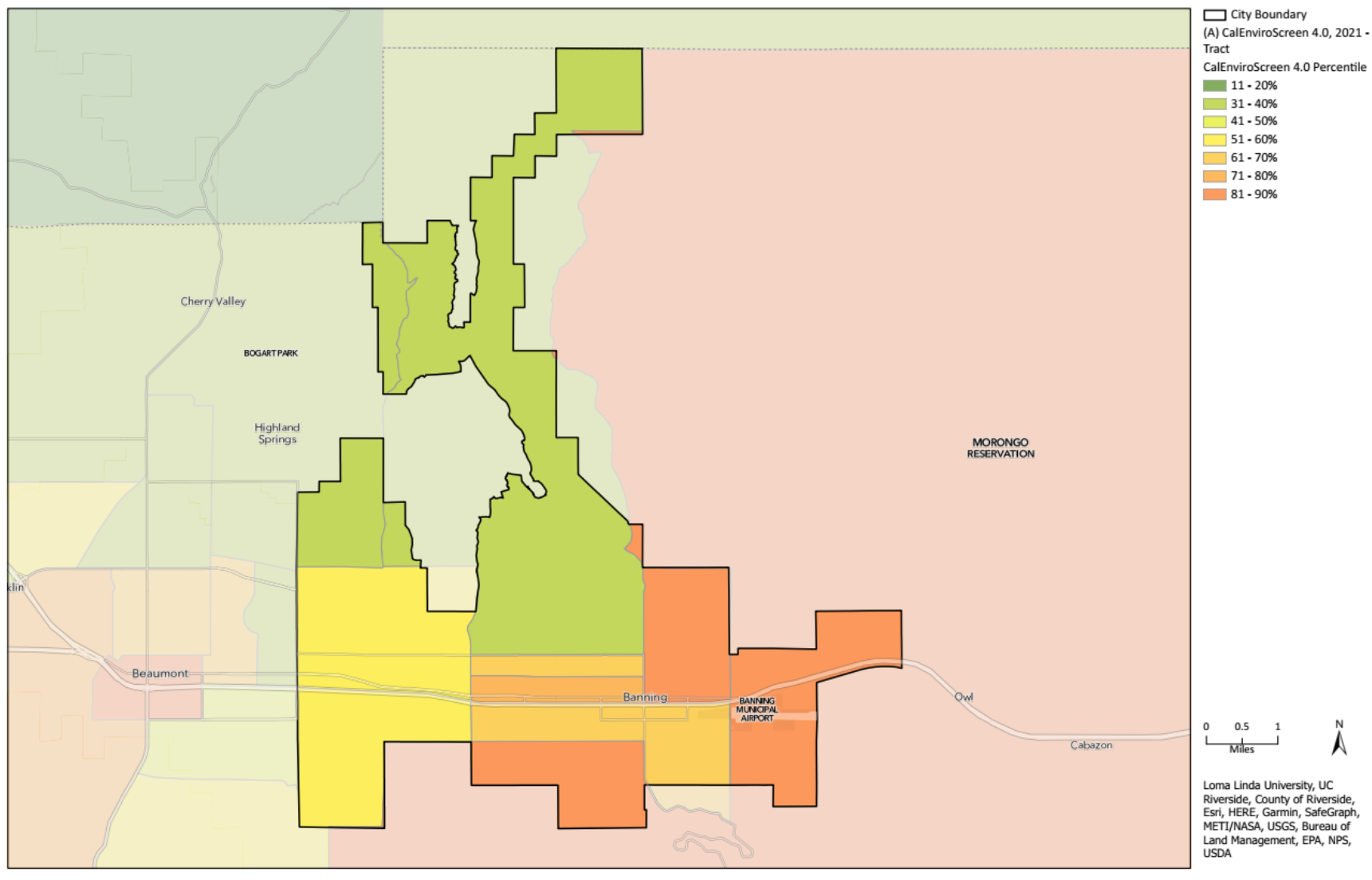
Source: AFFH Viewer 2021

Figure 25 CalEnviroScreen Percentile Scores (County of Riverside)



Source: AFFH Viewer 2021

Figure 26 CalEnviroScreen Percentile Scores (City of Banning)

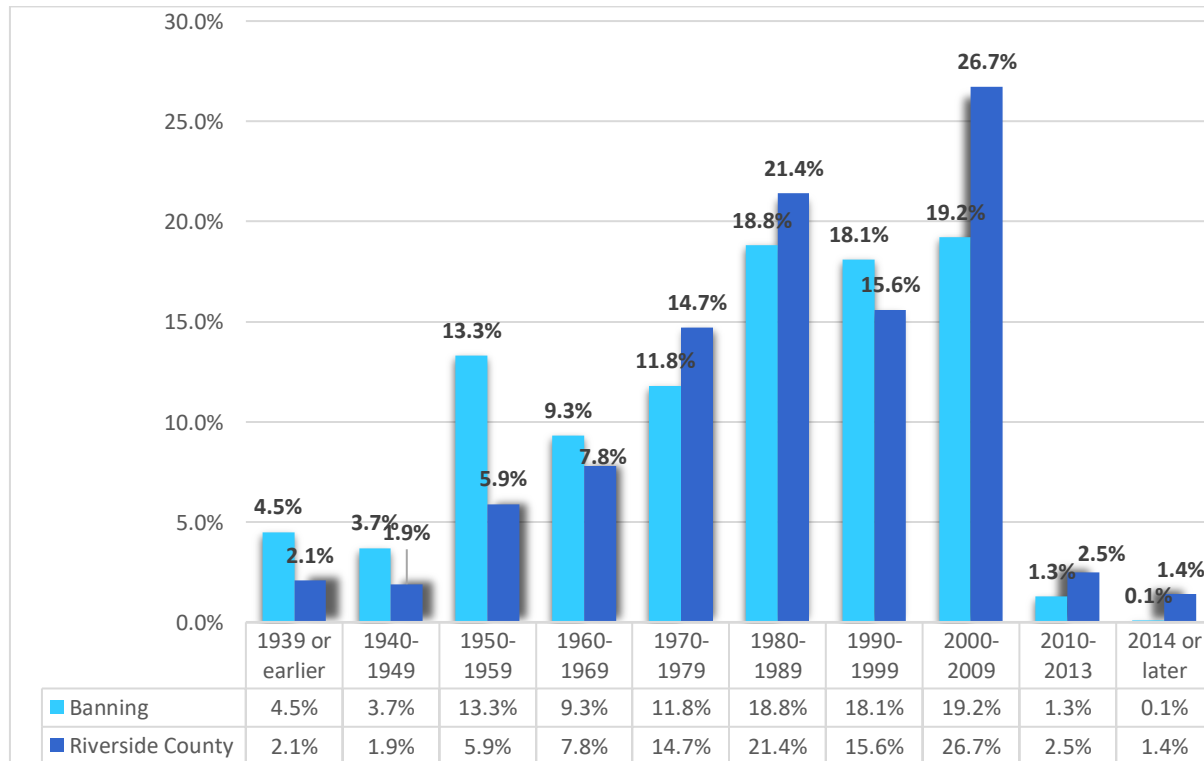


Source: AFFH Viewer 2021

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.⁷ 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.

⁷ <https://www.desertsun.com/story/news/2020/05/06/riverside-county-point-time-survey-finds-increase-homeless-youth/5180757002/>

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.

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) American Red Cross Catholic Charities
Persons With AIDS/HIV	Inland AIDS Project (Eastern County) Desert AIDS Project (Western County)

Source: 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

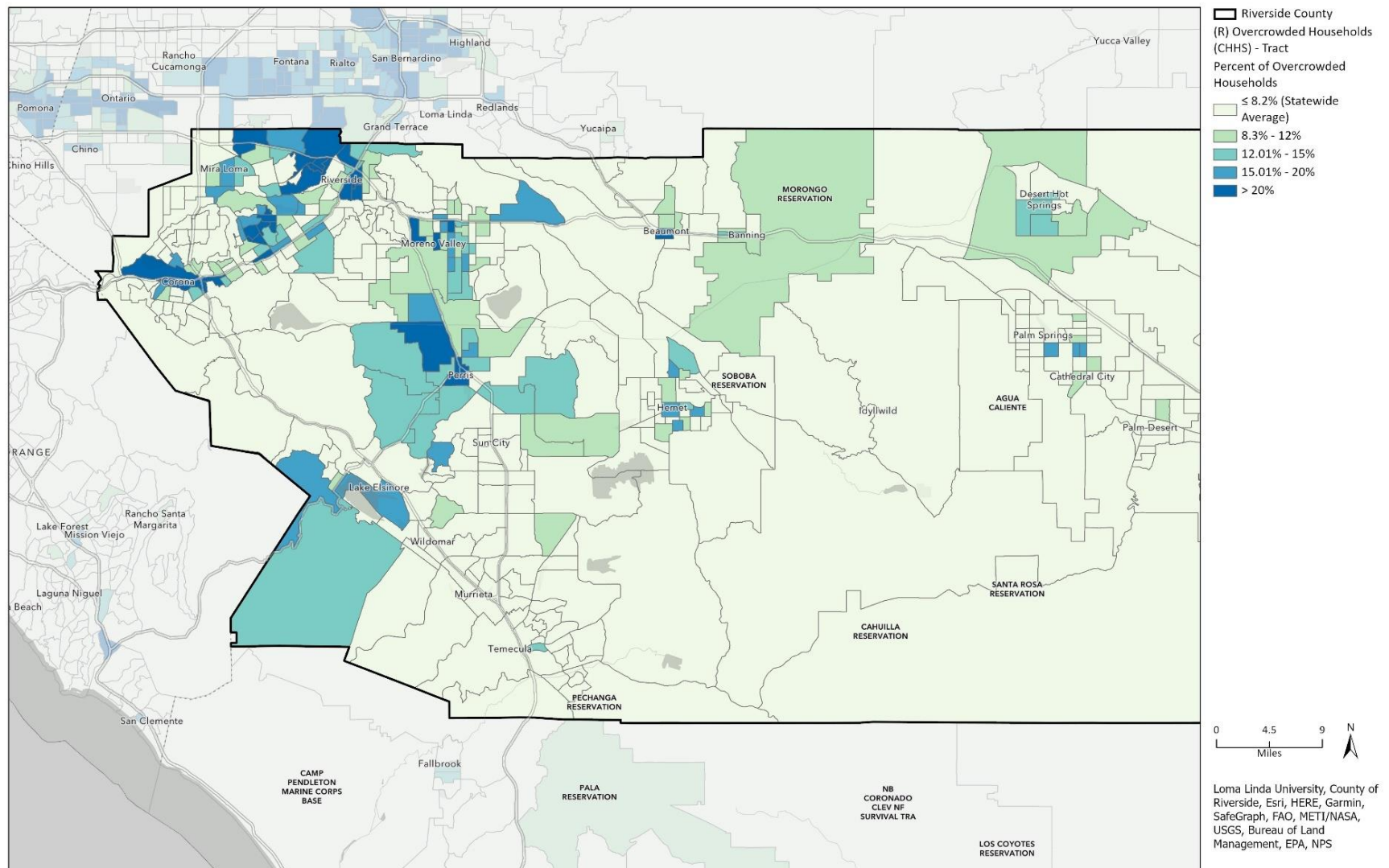
Based on 2014-2018 ACS estimates, Banning has a lower percentage of overcrowded households than the county as a whole (4.3 percent versus 5.0 percent), but a higher percentage of households that are considered severely overcrowded (2.3 percent versus 1.9 percent). Additionally, 6.5 percent of all households 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.

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.

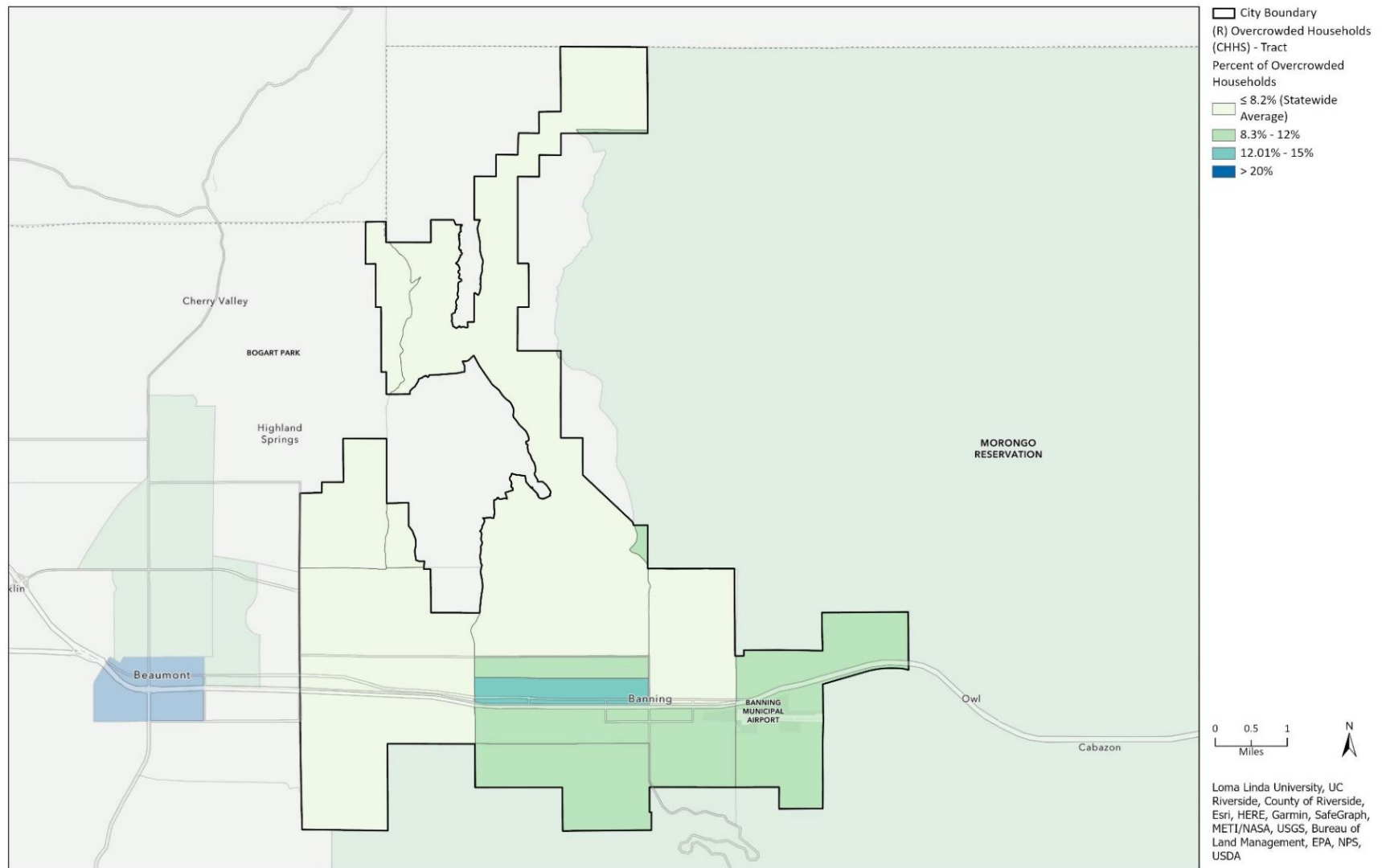
Riverside County Trends

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

Figure 28 Overcrowded Housing (County of Riverside)

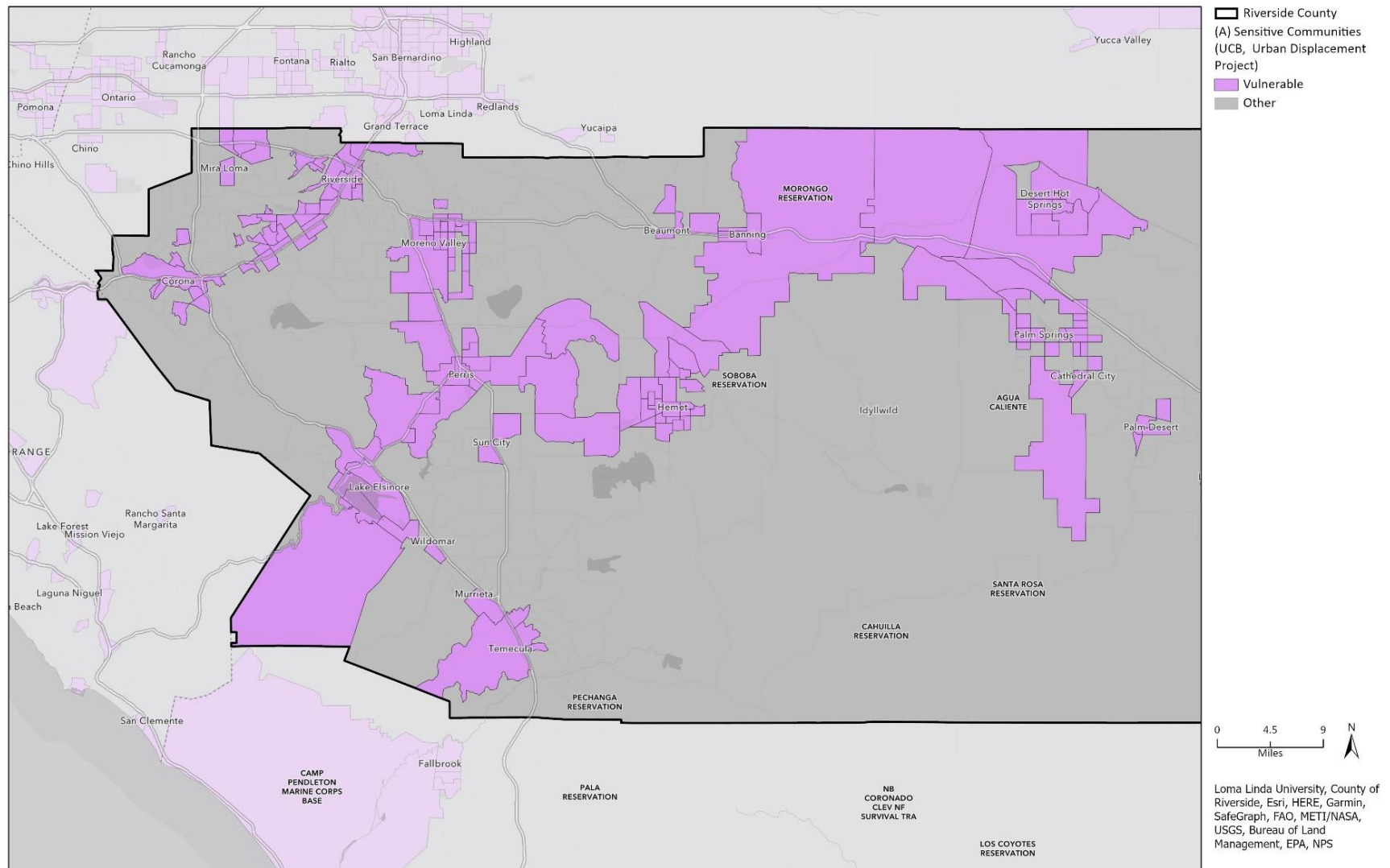
Source: AFFH Data Viewer, 2021

Figure 29 Overcrowded Housing (City of Banning)



Source: AFFH Data Viewer, 2021

Figure 30 Sensitive Communities (County of Riverside)



Source: AFFH Data Viewer, 2021

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. As shown in Figure 31, 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.

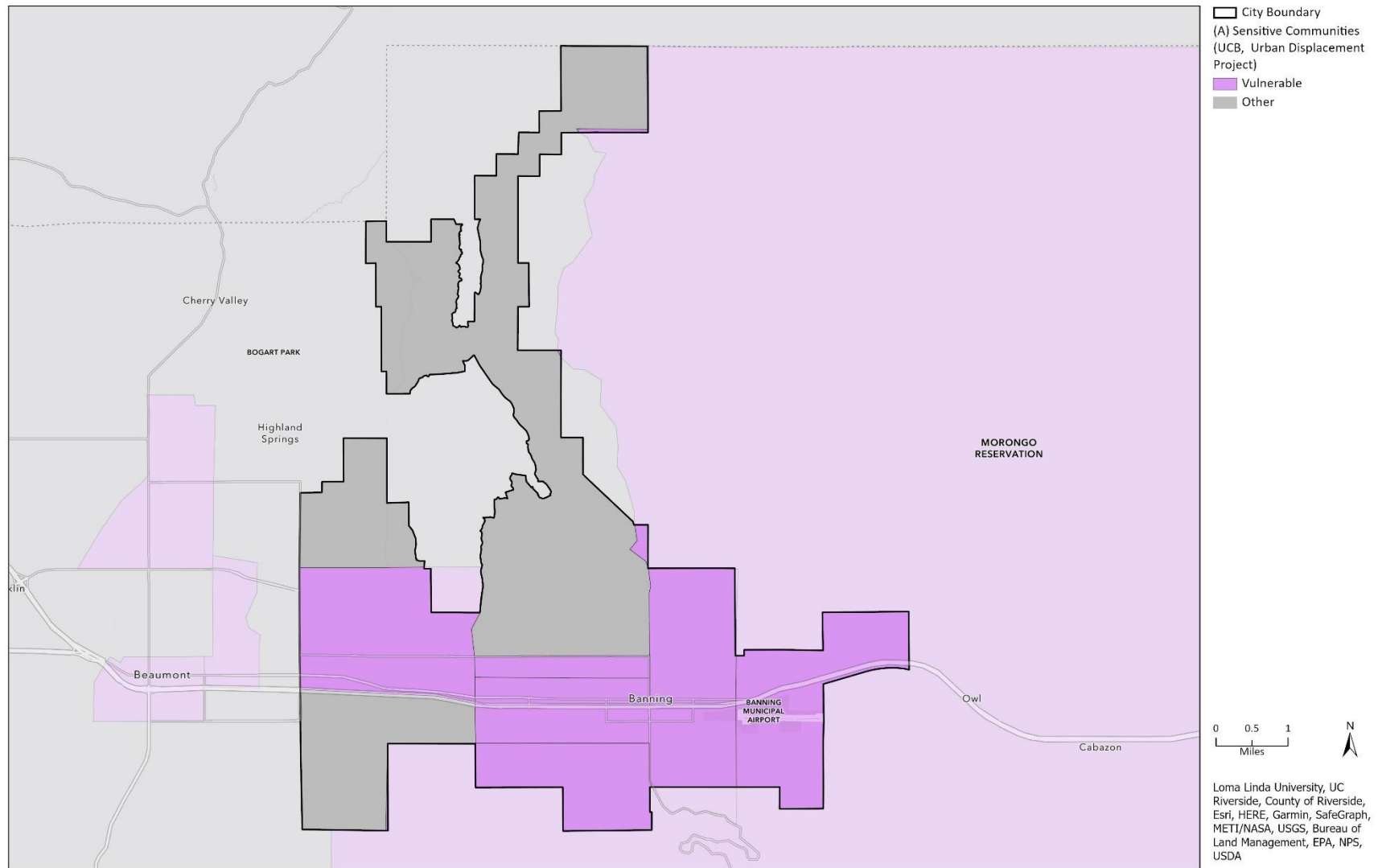
Disproportionate Housing Needs: Contributing Factors

- 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.

Figure 31 Sensitive Communities (City of Banning)



Source: AFFH Data Viewer, 2021

Historic Development Patterns and Racial/Ethnic Segregation

Historically, exclusionary housing policies such as redlining and discriminatory racial covenants reduced economic opportunities and quality of life for minorities by denying mortgages and encouraging disinvestment areas in minority-concentrated communities. [The County of Riverside Analysis of Impediments \(AI\)](#) identified that Hispanic and Black residents continue to be underrepresented in the homebuyer market and have experienced disparities in loan approval rates. The AI also recognized that fair housing activities are limited; despite laws prohibiting discrimination, residents can experience housing bias on the basis of physical disability, race, and ethnicity.

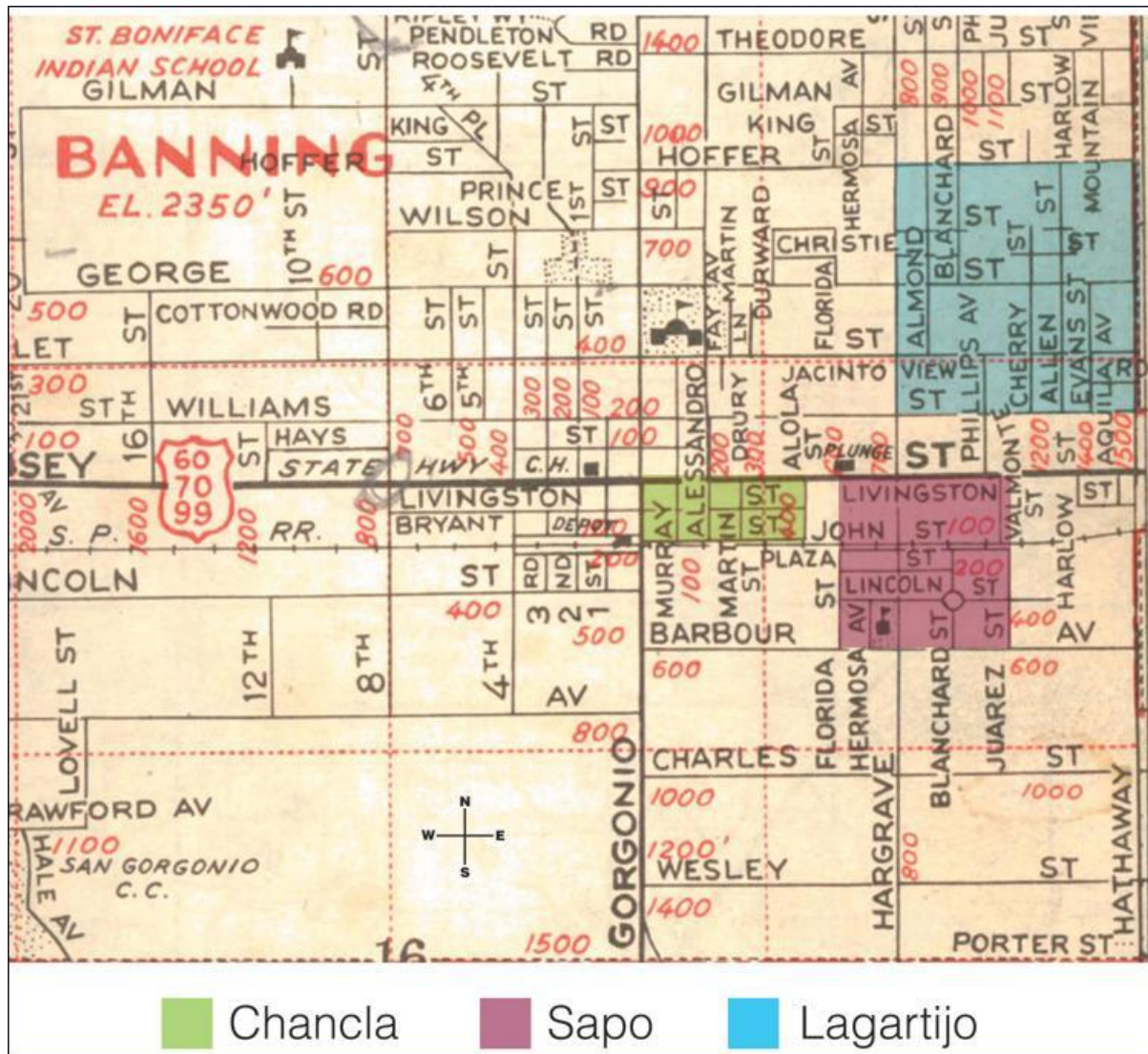
In the City, Hispanic residents have historically experienced discriminatory land use planning. Beginning in the 1880s, three Hispanic “barrios” were established by families of Mexican descent, who moved to Banning as they constructed the Southern Pacific Railroad. These barrios were named Chancla, Sapo, and Lagartijo. These neighborhoods, as shown in Figure 32, flourished until the construction of I-10, which was built directly through these neighborhoods in 1960, and then isolated the small areas of the barrios that remained.⁸ These neighborhoods were historically located on the eastern side of the City east of San Gorgonio Avenue, and are currently zoned Industrial, Downtown Commercial, and High Density Residential. These areas are located in portions of the City that are considered to have more racial/ethnic segregation, lower income levels, overcrowded, low resource, and vulnerable to displacement.

Recent Community Investment

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 Gorgonio 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

⁸ [San Gorgonio Pass Historical Society: http://sgphs.org/exploring-the-barrios-of-bannings-past/](http://sgphs.org/exploring-the-barrios-of-bannings-past/)

Figure 32 Historic Barrios in Banning

Courtesy of Bill Bell/Banning Public Library, as shown on <http://sgphs.org/exploring-the-barrios-of-bannings-past/>

Housing Affordability and Affordable Housing Development

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.

Infrastructure for Affordable Housing

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.

At-Risk Affordable Housing

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. 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 the 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
Total	–	237	0	234	–	0	234	–	–

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

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.

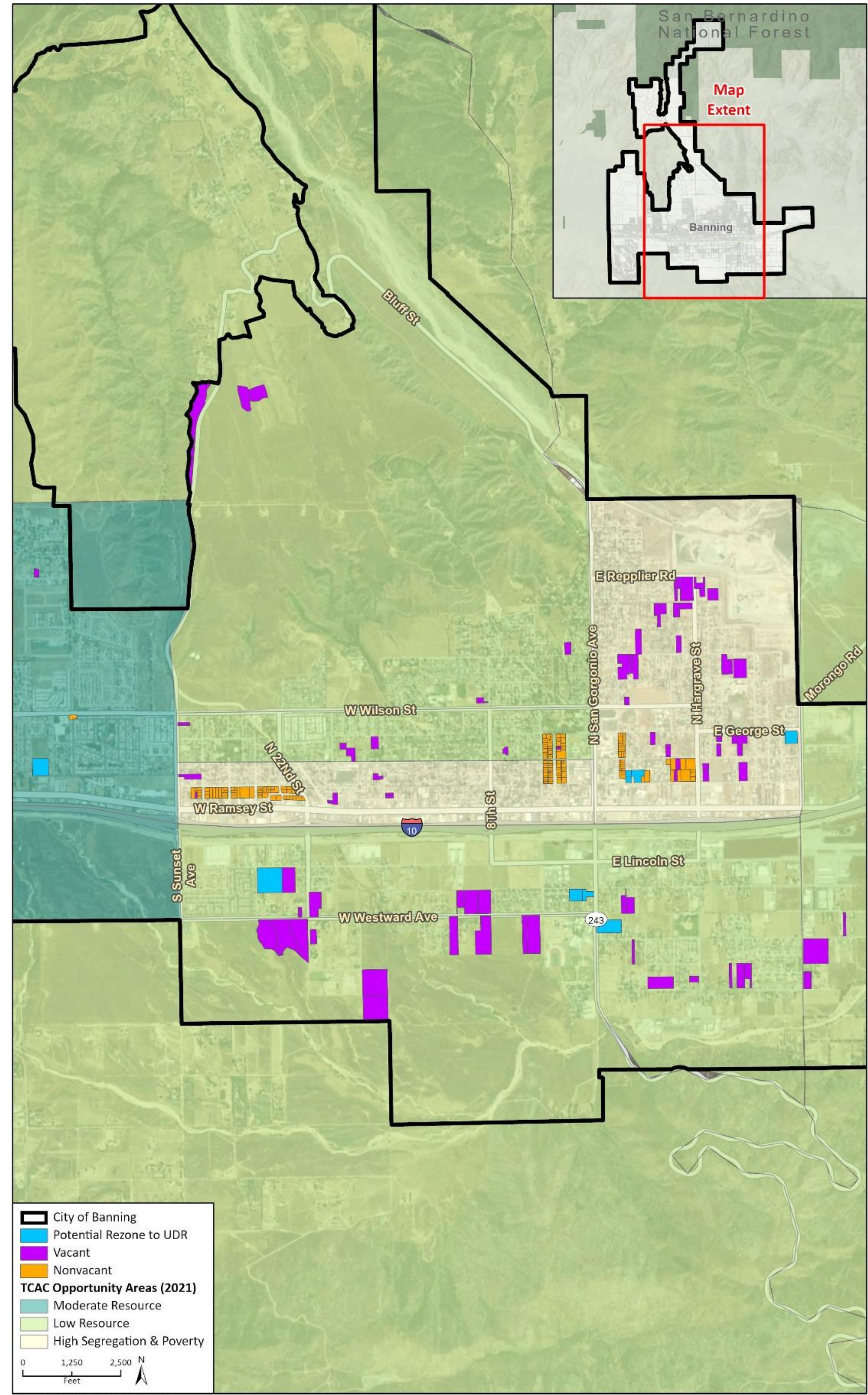
Opportunity Areas

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. The majority of the City's area is considered low resource, with moderate resource areas to the west (Census Tract 441.03) and high resources areas to the northwest. The center of the city (Census Tract 441.01) is considered an area of High Segregation and Poverty. As seen throughout this analysis, Census Tract 441. Figure 33 shows the resource areas in Banning compared to the sites identified in the Sites Inventory.

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Figure 33 Opportunity Areas Map (City of Banning)



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As shown on Figure 33, sites are spread throughout the city, on vacant and nonvacant sites. Lower sites occur on vacant parcels in both low and moderate resources areas throughout the city. Identified sites that would accommodate the lower income category would be rezoned to Urban Density Residential (UDR) which would accommodate 30 dwelling units per acre. Moderate sites were identified on nonvacant sites that are zoned for High Density Residential. These sites occur in the center of the city low and moderate resource areas. Units that would accommodate the above moderate category are located on vacant sites throughout the city, specifically along Westward Avenue and east of San Gorgonio Road. Areas of high segregation and poverty occur in Census Tracts 441.01 and 442. No sites were identified in Census Tract 441.01. However, site that would accommodate low-, moderate-, and above moderate-income units were identified in Census Tract 442. Programs and meaningful actions associated with this analysis will target these low resource areas.

Risk of Exacerbated Conditions

Census Tract 442, which involve higher concentrations of minorities, cost burdened households, and overcrowded households, would accommodate housing of a variety of income levels under the Housing Plan. Though this tract would predominately accommodate above moderate-income units, sites accommodating lower-income units are also identified in the tract. Lower-income sites are spread out throughout the city on vacant parcels in a variety of resource areas. Programs and meaningful actions are tailored to target these tracts to promote revitalization and investment in this area.

Integration and Segregation: Race and Income

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). Census tracts with the highest concentration of minorities and LMI populations are located along I-10 in the central part of the city and east of San Gorgonio Avenue. Sites in all income categories are spread throughout the city and are not concentrated in areas of high minority and LMI population. As shown on Figure 33, most of the nonvacant sites, four of the nine rezone sites, and approximately half of the vacant sites are located in overlapping areas that are considered both low resource and high segregation and poverty. These sites were chosen for proximity to transit, food services, employment, and civic services. These areas also overlap with Banning's Opportunity Zones for economic development, with incentives for business and property investment and economic stimulation. New housing development in these areas supports civic and financial reinvestment into these communities.

Approximately half of the rezone sites that can accommodate densities appropriate for low-income households would be located in areas that do not experience high racial/ethnic segregation and poverty, providing more housing opportunities for low-income households in areas with more resources and racial/ethnic diversity.

Racially/Ethnically Concentrated Areas of Poverty and Affluence

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.

Access to Opportunity

The majority of sites would be located in areas TCAC has designated as low and moderate resources (Figure 32). Sites also occur in areas of high segregation and poverty. Almost all (373 out of 378) moderate income units and almost all (405 out of 406) above-moderate income units in the sites inventory would be located in TCAC-designated areas of low resources, while 91 out of 600 very low- and low-income-income units would be located in areas considered to be of moderate resources. Therefore, the sites inventory would not disproportionately concentrate lower-income households in different resource areas, and the sites identified areas of high poverty and segregation are scattered on vacant parcels and facilitate the development of lower-, moderate-, and above moderate income units in low resource areas.

Disproportionate Housing Needs

The fair housing assessment found a need for affordable housing for people with disabilities disproportionate housing need for the following groups: people with disabilities, single-parent and female-headed households, people at risk of displacement, overcrowded households, and people living in poverty. Areas with higher concentrations of disproportionate housing needs tend to overlap in the following areas:

- East of Sunset Avenue, north of I-10, and south of Nicolet Street.
- East of San Geronimo Ave, north and south of I-10.

The Housing Element commits the City to create opportunity for at least 600 units of housing affordable to very low and low-income households. Four out of nine rezone sites that could accommodate low-income household development would be located in areas with higher concentrations of these special needs groups.

Additionally, the housing plan would accommodate an assumed development of 91 units affordable to low-income residents would be located on W. Jacinto Road on the western side of the City, in an area with a higher concentration of people with disabilities.

The City supports affordable housing for persons with disabilities by reviewing and approving requests for modifications to building or zoning requirements in order to ensure accommodations for persons with disabilities. The City may also assist in acquiring and assembling property, subsidizing on-site and off-site improvements, and assisting in relocation activities as well as clearing and demolition.

Subsidized Housing

As discussed in Chapter 2, Banning has three publicly assisted rental housing projects in the city that rely on Section 202, Section 811, and/or Section 8 assistance. None of these projects will be at risk of conversion to market rate over the next 10 years. As shown on in Figure 34, 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. The Sites Inventory does not focus lower income sites in areas with historically high levels of housing choice voucher recipients.

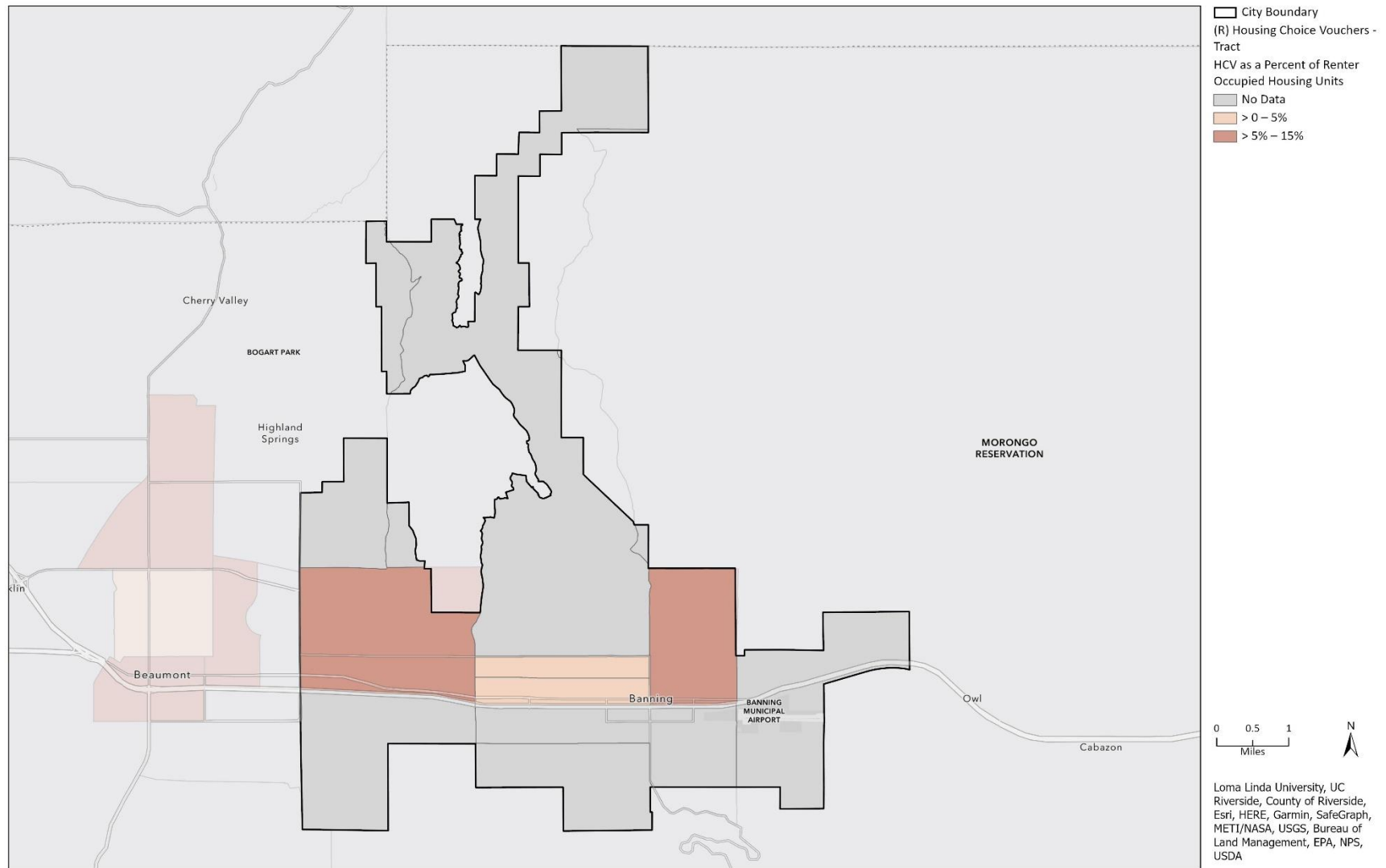
Fair Housing Priorities and Goals

Table 14 identifies fair housing issues in Banning and suggests meaningful actions to further fair housing in the City.

The City of Banning further addresses these impediments 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

Figure 34 Housing Voucher Recipients (City of Banning)



Source: AFFH Data Viewer, 2021

Table 14 Fair Housing Issues, Contributing Factors, and Meaningful Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Metrics and Milestones
<p>Enhancing fair housing outreach and housing mobility strategies. Areas of the City are segregated by racial/ethnic and access to resources.</p>	<ul style="list-style-type: none"> Insufficient and inaccessible outreach and enforcement Lack of public input and feedback on issues and strategies Lack of marketing community meetings Insufficient local public fair housing enforcement and testing 	<ul style="list-style-type: none"> Participate in the FHCRC meetings, at least once annually, to coordinate regional responses to housing discrimination issues. Continue to invest in Fair Housing resources through a contract with Riverside Legal Aid (RLA) to support residents who need Fair Housing resources, mitigation, or legal advice. At least once annually in areas of high segregation and poverty (Census Tracts 441.01 and 442), 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 considerations for attendees. The first workshop shall occur by December 15, 2022. Objective is to have at least ten workshop attendees. Conduct bilingual multimedia campaigns for housing-related educational events, including social media and printed flyers posted in the common area of large apartment complexes, community centers, the Banning Library, laundromats, and other strategic visible locations, with a focus on Census Tracts 441.01 and 442. The first educational event shall occur by December 15, 2022. 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, 2022. Objective is to receive feedback from at least 15 participants. Work with the FHCRC to conduct random testing at least once every five years in Banning. Specifically, with the release of the 2020 Census, determine the appropriate bases be tested in the city. Involve neighborhood groups and other community organizations when conducting outreach and education activities. Annually work with the Housing Authority of the County of Riverside to conduct landlord outreach to expand the location of participating voucher properties so voucher use would not be concentrated in Census Tracts 442.03 and 442. The first instance shall occur on or before December 15, 2022. Objective is to provide outreach to at least five landlords. 	<ul style="list-style-type: none"> Staff attendance at meetings sponsored by FHCRC. First fair housing law workshop to occur by December 15, 2022, with at least 10 attendees (tenants and/or landlords). Bilingual multimedia campaign and one educational event by December 15, 2022. Workshop feedback from at least 15 residents by December 15, 2022. Outreach with at least 15 landlords regarding voucher properties by December 15, 2022.

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Metrics and Milestones
Encouraging development of new affordable housing in Limited Affordable Housing Options in Areas/Zones of High Opportunity	<ul style="list-style-type: none"> ▪ Dominance of single-family housing, which is typically more expensive than multi-family ▪ Lack of inclusionary housing requirements ▪ Limited access to home purchase loans 	<ul style="list-style-type: none"> ▪ Diversify and expand the housing stock to accommodate the varied housing needs of different groups within the high and moderate resource areas east of N. Sunset Avenue. ▪ At least once every five years, assist a resident with the First-Time Homebuyer Down Payment Assistance Program (Program 18) or Mortgage Credit Certificate Program (Program 19) for a home located in the high and moderate resource areas east of N. Sunset Avenue. ▪ Prioritize the high and moderate resource areas east of N. Sunset Avenue when identifying potential sites for Habitat for Humanity builds. ▪ 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, 2022. Objective is to have at least five workshop attendees. 	<ul style="list-style-type: none"> ▪ Execution of an Affordable Housing Development Agreement with a developer to assist or partner in the development of at least one affordable multi-family opportunity, the conversion of existing market rate units to moderate or low income units, or housing for people with special needs, in areas identified as high opportunity during the 2021-2029 planning period. ▪ One informational workshop regarding accessory dwelling units by December 15, 2022, with at least five attendees. ▪ One instance of First-Time Homebuyer Down Payment Assistance Program or Mortgage Credit Certificate Program in high or moderate resource areas.

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions	Metrics and Milestones
Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housingSensitive communities in zones of high opportunity	<ul style="list-style-type: none"> ▪ Shortage of subsidized housing units ▪ Cost of repairs or rehabilitation ▪ Dominance of single-family housing, which is typically more expensive than multi-family ▪ Limiting local land use policies ▪ Limited access to home improvement financing 	<ul style="list-style-type: none"> ▪ Continue to invest in public facility and infrastructure projects that improve the quality of life for residents, especially in Census Tracts 442.03 and 442. ▪ Provide rehabilitation financing assistance for at least three households. ▪ Conduct a multimedia campaign (i.e., social media) to encourage residents to learn about available programs such as the Assistance Program (Program 18) or Mortgage Credit Certificate Program (Program 19), beginning no later than December 15, 2022. ▪ Connect lower-income residents with affordable homeownership and rental opportunities. ▪ Promote development of affordable housing in higher resource areas, mixed-use and infill areas, and near services (transit corridors), prioritizing Census Tract 442.03. ▪ Starting in January 2023, take appropriate measures to ensure regulatory compliance with State law to facilitate affordable housing (including ADUs), and Housing for Homeless and Special Needs. 	<ul style="list-style-type: none"> ▪ Facility improvements and infrastructure projects in Census Tracts 442.03 and 442. ▪ Rehabilitation financing assistance for at least three households. ▪ Multimedia campaign regarding available programs, beginning no later than December 15, 2022. ▪ Evidence of action to ensure regulatory compliance with State law to facilitate affordable housing in January 2022.
Protecting existing residents from displacementRisk of displacement in certain communities.	<ul style="list-style-type: none"> ▪ Lack of private investments in specific neighborhoods ▪ Lack of public investments in specific neighborhoods, including services or amenities ▪ Historic discriminatory land use planning and neighborhood isolation 	<ul style="list-style-type: none"> ▪ Target housing resources to displacement risk areas (Census Tracts 442.03 and 442). ▪ By December 2022, develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities. ▪ Work with at least one developer to support subsidized housing development. 	<ul style="list-style-type: none"> ▪ Development of program to connect with lower-income residents with affordable opportunities by December 2022.
Need for affordable housing for special needs populations	<ul style="list-style-type: none"> ▪ Dominance of single-family housing, which is typically more expensive than multi-family ▪ Governmental constraints for housing opportunities 	<ul style="list-style-type: none"> ▪ 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. ▪ Continue to monitor policies, standards, and regulations and make annual updates to remove identified constraints to development of housing for special needs populations. ▪ 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. 	<ul style="list-style-type: none"> ▪ Annual updates remove identified constraints on housing for special needs populations. ▪ Update Zoning Ordinance by October 2023. ▪ Develop 16 special needs units by 2029.

- Serving as an overall fair housing resource for the area, including implementation of an affirmative fair housing market plan.

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.