



Staff Report

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**File #:** 21-0897

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**PLANNING AND HOUSING COMMISSION  
STAFF REPORT**

**DATE:** 10/11/2021

**TO:** Honorable Chair and Commissioners

**FROM:** Planning & Development Department

**APPLICATION REQUEST:**

**GPA2021-0001:** General Plan Housing Element Update for Planning Period 2021-2029 for the 6<sup>th</sup> Cycle Regional Housing Needs Assessment. (Applicant: City of Corona)

**RECOMMENDED ACTION:**

**That the Planning and Housing Commission** recommend adoption of the Addendum to the General Plan Environmental Impact Report (SCH#2018081039) and APPROVAL of GPA2021-0001 to the City Council, and adopt Resolution No. 2578 granting GPA2021-0001 to update the General Plan Housing Element for Planning Period 2021-2029.

**EXECUTIVE SUMMARY**

The Housing Element is one of the eight mandatory elements of the City's General Plan. Pursuant to state law, the Housing Element is required to be periodically updated, which is every eight years. 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.

**BACKGROUND**

The city initiated the update to its Housing Element in November 2020. The Housing Element Update for planning period 2021-2029 aligns with the State's allocation of the Regional Housing Needs Assessment, commonly known as RHNA. The Southern California Association of Governments (SCAG) Regional Council adopted the final RHNA allocation for the jurisdictions within its region at its meeting on March 4, 2021. The below table shows the city's final RHNA allocation on the number residential housing units for each income category. The city is required to show how the units are being planned for in the Housing Element Update.

**Table 1**  
**City of Corona RHNA Allocation**  
**Years 2021-2029**

Income Category Based on Area Median Income (AMI)	Number of Units to Accommodate	Percentage
Very Low Income between 31 and 50% AMI	1,752	28.8%
Low Income between 51 and 80% AMI	1,040	17.1%
Moderate Income between 81% and 120% AMI	1,096	18.0%
Above-Moderate Income greater than 120% AMI	2,200	36.1%
Total	6,088	100.0%

Public Meetings on the Housing Element Update

The following is a summary of the public meetings that discussed the Housing Element Update for planning period 2021-2029.

- **January 21, 2021. City Council and Planning and Housing Commission Joint Study Session.** The study session covered an introduction to the Housing Element Update, the RHNA allocation process, various state legislation governing Housing Element law, and the information covered in the Housing Element.
- **February 16 & 18, 2021. Stakeholder Workshops.** The city held two stakeholder workshops with special interest groups on the Housing Element Update. Special interest groups included organizations and agencies that provide housing or assist special needs groups with housing opportunities (low-income persons, senior citizens, persons with disabilities, persons needing rehabilitation, persons experiencing homelessness, persons of domestic violence, etc.).
- **March 17, 2021. City Council Public Meeting.** At the request of the City Council, staff provided an administrative report on the RHNA and the state law regarding the implementation of the RHNA.
- **May 27, 2021. Community Meeting.** The city held a community meeting on the Housing Element Update. The meeting covered the purpose of the Housing Element, the city's RHNA allocation, and the housing sites inventory.
- **June 21, 2021. Planning and Housing Commission Meeting.** An administrative report was provided to the Commission on the release of the Housing Element Update 2021-2029 Draft. The draft document was posted on the city's website and was made available to the public for a period of 60 days for review and public comments.
- **June 23, 2021. City Council Study Session.** An update on the status of the Housing Element Update and the housing sites inventory was provided to the City Council.

Public Information Outreach on Housing Element Update

The city created a Housing Element Update webpage where the public can find information. The Housing Element Update webpage is available at [www.CoronaCA.gov/GPUUpdate](http://www.CoronaCA.gov/GPUUpdate). Additionally, the city has used the following mechanisms to advertise public meetings on the Housing Element Update and other information as it becomes available.

- **Housing Survey.** An online housing survey was made available to the public for a period of 35 days starting on January 25, 2021. The city received 260 responses on the survey. The results of the housing survey are included in Appendix A of the Housing Element Update 2021-2029 Draft.
- **Stakeholder Workshops.** The city circulated a flyer on the city’s Facebook page and on the Housing Element Update webpage advertising the stakeholder workshop meetings on February 16 & 18, 2021. Staff also circulated an email with the flyer to 74 special interest groups on the city’s contact list. This information is provided in Appendix A of the Housing Element Update Draft.
- **Community Meeting.** The city circulated a flyer on the city’s Facebook page and on the Housing Element Update webpage advertising the community meeting on May 27, 2021. Additionally, staff mailed 100 letters to the property owners that have property identified on the housing sites inventory and circulated an email with the flyer to 74 special interest groups on the city’s contact list. This information is provided in Appendix A of the Housing Element Update Draft.
- **Map Social Interactive Mapping Tool.** The city advertised on its Facebook page the availability of an interactive mapping tool on the proposed housing sites inventory. The purpose of the mapping tool is to engage feedback on the housing sites being identified in the Housing Element Update.
- **City Facebook and Housing Element Update Webpage.** Announcements on the Housing Element Update are posted on the City’s Facebook in addition to the website. Materials related to the Housing Element are also posted on the website.

An email address was also created so that the public can send comments or questions on the Housing Element Update. The email address is posted on the Housing Element Update webpage.

Housing and Community Development (HCD) Review of Corona’s Housing Element Update Draft

The city submitted its Housing Element Update Draft to HCD on July 1, 2021, initiating a 60-day review by HCD. HCD completed its review on August 30, 2021. The Housing Element Update has since been revised to reflect the comments received from HCD. The revised Housing Element Update was posted on the city’s Housing Element Update webpage on September 27, 2021.

**PROJECT DESCRIPTION**

The Housing Element Update in its entirety is included as Exhibit 2. The element includes six chapters and appendices A through C. The following is a brief description of the chapters and appendices covered in the element.

**Chapter 1: Introduction.** This chapter gives a general overview of the city’s profile, the purpose of

the Housing Element, sources of information used in the Housing Element and the public participation process.

**Chapter 2: Housing Needs Assessment.** This chapter covers the city’s population growth trend, the city’s characteristics (age distribution, race and ethnicity, employment, household characteristics, household by income category, special need groups), housing stock characteristics, Riverside County’s Area Median Income, and the number of assisted housing units in Corona.

The average median income in Riverside County based on a 4-person household is \$77,500. This is based on HCD’s state income limits published in 2021. Based on the area median income (AMI), the household income distribution in the city is shown in the below table. This information is also shown in Table 10 of the Housing Element.

**Table 2 Households by Income Category**

Income Category (Percent of County AMI)	Households
Extremely Low (30% or less)	8.8%
Very Low Income (less than 50% if AMI)	15.6%
Low Income (50-80% AMI)	15%
Moderate Income (80-120% AMI)	12%
Above Moderate Income (greater than 120%)	48.5%

A summary of some of Corona’s housing characteristics is shown in the below tables. Table 3 shown below shows Corona’s household characteristics and Table 4 shows the average household size and overcrowded households in the city. These tables are also provided in Chapter 2 of the Housing Element as Tables 7 and 9.

**Table 3: Household Characteristics**

	Single Person Households (% of Total)	Senior Headed Households (% of Total)	Families with Children (% of Total)	Single-Parent Households (% of Total)	Large Households (% of Total)	Total Households
Corona	10,309 (20.7)	8,115 (16.3)	18,219 (36.6)	4,167 (8.4)	8,976 (18.0)	49,786

**Table 4 Average Household Size and Overcrowded Households**

Jurisdiction	Average Household Size	Percent of Households That are Overcrowded	Percent of Overcrowded Households: Renters	Percent of Overcrowded Households: Owners
Corona	3.32	5.9%	66.4%	33.6%

The city’s housing stock mostly consists of single-family homes at 37,394 units (72.6%) followed by multiple family homes at 12,275 units (23.8%). Mobile homes or other units include 1,835 units (3.6%). The information in the Housing Element is based on 2014-2018 data from the American Community Survey.

**Chapter 3: Housing Constraints.** This chapter talks abouts constraints when it comes to building housing or providing housing. Housing constraints can include market constraints (construction and labor costs, land cost and financing), governmental constraints (land use zoning and development standards related to parking requirements, lot coverage, building setbacks and open space), constraints when it comes to providing housing for persons with special needs (24-hour care facilities, emergency shelters, mobile homes, accessory dwelling units, transitional and supportive housing), development fees and infrastructure requirements associated with new construction, permit processing times, etc.

**Chapter 4: Housing Resources.** This chapter talks about the city’s future housing need, Corona’s RHNA allocation and the financial resources that can be applied toward low income housing. This chapter identifies the income categories the city is meeting on its RHNA allocation for planning period 2021-2029 based on existing zoning (includes vacant sites and non-vacant sites) and pending projects that have either been approved but not yet built or submitted to city staff for review but not yet entitled. This chapter also shows the number of units the city is deficient in meeting the RHNA allocation based on existing conditions.

The city is required to plan for the housing units that are not met based on existing zoning. Table 5 (shown as Table 45 in the Housing Element) shows the city needs to plan for low and moderate-income units by rezoning property. Sites suitable for low income units must have a zoning and General Plan designation that allows a higher density of at least 30 dwelling units to the acre. Moderate income units also can be accounted for in the higher density but can be included in a medium density that allows up to 15 dwelling units to the acre. Therefore, to plan for the city’s RHNA allocation of low and moderate income units for planning period 2021-2029, the city will need to rezone property. The city will need to rezone property to accommodate 2,532 low income units and 887 moderate income units. Overall, the city’s rezoning would accommodate 3,123 low income units and 888 moderate income units. The surplus of units provides the city with a buffer to accommodate a potential shortfall of sites should any of the low income sites identified in the sites inventory is underbuilt.

**Table 5 Residential Sites Inventory**

	Lower Income	Moderate Income	Above Moderate Income	Total
<b>RHNA Allocation</b>	<b>2,792</b>	<b>1,096</b>	<b>2,200</b>	<b>6,088</b>
Planned and Approved Units	0	92	2,110	2,202
ADUs Anticipated	46	28	6	80
<b>Remaining RHNA</b>	<b>2,746</b>	<b>976</b>	<b>84</b>	<b>3,806</b>
Vacant Units	132	56	595	783
Nonvacant Units	82	33	255	370
Potential Rezone	149	219	0	368
Affordable Housing Overlay	2,983	669	0	3,652
<b>Total Units</b>	<b>3,346</b>	<b>1,097</b>	<b>2,966</b>	<b>7,455</b>
<b>Total Unit Surplus</b>	<b>600</b>	<b>1</b>	<b>766</b>	<b>1,367</b>

The rezone sites are shown as Figure 9 and Figure 10 in the Housing Element. The city is taking two approaches on the rezone program. The first approach is shown in Figure 9 which includes rezoning property to either a high density or medium density designation. These sites were chosen based on their current condition and if the size of the property can support additional housing units. For example, the properties shown on Quarry Street across from City Park and the parcels on Ford Street and Barth Street are zoned single family residential but have parcel sizes capable of accommodating additional units such as a duplex. Properties such as this are being considered for medium density development to accommodate moderate income units.

The parcels shown on Figure 10 are intended to be rezoned with an affordable housing overlay zone. 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. The non-vacant commercial sites included in the housing sites inventory were selected because the sites may be underutilized, have building coverage less than 50%, have struggled with vacancies or turnover over the years and are within walking distance to public transportation and other commercial services.

The affordable housing overlay zone will allow up to 60 dwelling units to the acre. To meet the RHNA allocation assigned to low income units, the city needs to allow for the higher density on the properties because of limited land resources.

The Housing Survey distributed in January 2021 asked respondents where housing should be located within the city and which areas of the city would be better suited for high density residential. The

majority of respondents (47.97%) said housing should be located throughout the city. However, when asked where high density housing would be better suited the majority of the respondents (75.20%) said in areas where public transportation is within walking distance. The second preference (42.80%) was in areas near commercial centers. A copy of survey responses is provided in Appendix A of the Housing Element.

#### Rezone Program

Properties that are required to be rezoned as part of the housing sites inventory of the Housing Element shall be done within three years of the start of the planning period. The start of the Housing Element planning period begins October 15, 2021. Therefore, the city will have three years from that date to complete its rezone program. The city will initiate a separate process after the adoption of the Housing Element to rezone the properties identified on the sites inventory. The rezone program would follow the same procedures as a change of zone, which requires the city to do an environmental analysis of the changes, create an affordable housing overlay zone, and conduct public outreach and public hearings on the process.

It is worth noting that with the passage of SB 1398, which was signed by the Governor on September 28, 2021, jurisdictions that fail to adopt a housing element that HCD has found to be in substantial compliance with State law within 120 days of the statutory deadline are to complete rezoning no later than one year from the statutory deadline. Therefore, if HCD does not determine to the city to have a state compliant Housing Element 120 days from October 15, 2021, the completion of the rezone program in the Housing Element would be reduced from three years to one year.

**Chapter 5: Review of Past Accomplishments.** This chapter covers the past accomplishments of the housing plan programs from planning period 2013-2021. This chapter identifies the previous programs from the Housing Element, the objectives of the programs and the city's progress and continued appropriateness of the programs.

**Chapter 6: Housing Plan.** This chapter identifies the goals and policies of the Housing Element and the housing programs that the city will implement in planning period 2021-2029. The programs will include existing programs being carried over into the new planning period as well as new programs. Certain programs are a continuation annually whereas others are required to be implemented by a certain date.

After the Housing Element Update Draft was posted on the website, the city made some redlined revisions to certain housing programs to better respond to HCD's comments. The programs in their entirety, including the redlines, is provided as Exhibit 3.

**Appendices A through C.** The appendices to the Housing Element Update include the public outreach materials used during the preparation of the Housing Element (Appendix A), spreadsheets of the sites inventory (Appendix B), and discussion on Affirmatively Furthering Fair Housing (Appendix C).

## **ENVIRONMENTAL ANALYSIS**

The City has prepared an environmental evaluation to analyze the potential environmental impacts of the Housing Element Update and whether the environmental impacts of the Housing Element were adequately addressed in the Corona General Plan Update EIR (SCH#2018081039) certified on June 3, 2020. The evaluation indicated that the Housing Element Update will not result in impacts beyond what was previously analyzed in the General Plan EIR or require mitigation measures not included previously because the project does not have new or substantially more severe significant environmental impacts. As permitted by State California Environmental Quality Act (CEQA) Guidelines Sections 15164(e) and 15168(c), an addendum to the General Plan EIR was prepared.

### **FISCAL IMPACT**

Not applicable.

### **PUBLIC NOTICE AND COMMENTS**

A 20-day public notice was advertised in the Sentinel Weekly News and posted on the city's website. Additionally, the city emailed the parties listed on the city's Housing Element Update stakeholder list. As of the preparation of this report, staff has not received any correspondence on the public hearing notice.

Prior to the public notice being posted, the city received a comment letter from Mitchell M. Tsai, Attorney at Law, dated August 13, 2021. This letter was submitted during the initial 60-day public review advertised in June 2021. Since the receipt of this letter, the Housing Element Update has been revised in response to comments received from HCD dated August 30, 2021.

### **STAFF ANALYSIS**

The Housing Element Update is necessary as it is one of the state mandatory elements of the General Plan. The Housing Element Update process aligns with the state's RHNA allocation and is subject to a statutory deadline, which is October 15, 2021. However, jurisdictions in the Southern California Association of Governments Region (SCAG) are given a 120-day grace period from the statutory deadline to submit an adopted Housing Element Update to HCD.

The Housing Element identifies strategies and programs that focus on: a) Conserving and improving existing affordable housing, b) Maximizing housing opportunities throughout the community, c) Assisting in the provision of affordable housing, d) Removing governmental and other constraints to housing investment, and e) Promoting fair and equal housing opportunities.

### **FINDINGS FOR THE APPROVAL OF GPA2021-0001**

1. The City has prepared an environmental evaluation to analyze the potential environmental impacts of the Housing Element Update and whether the environmental impacts of the Housing Element were adequately addressed in the Corona General Plan Update EIR (SCH#2018081039) certified on June 3, 2020. The evaluation indicated that the Housing Element Update will not result in impacts beyond what was previously analyzed in the General Plan EIR or require mitigation measures not included previously because the project does not have new or substantially more severe significant environmental impacts. As permitted by State California Environmental Quality Act (CEQA) Guidelines Sections 15164(e) and 15168(c),



an addendum to the General Plan EIR was prepared.

2. GPA2021-0001 is in the public interest and would not be detrimental to public health, safety and welfare for the following reason:
  - a. The Housing Element is an integral part of the City's General Plan and its purpose is to adequately provide for the planning of housing for all economic segments of the community and to ensure housing opportunities and housing services are available to the most vulnerable populations and those with special needs.
  
3. GPA2021-0001 is internally consistent with the elements of the General Plan, including the goals and policies stated therein for the following reasons:
  - a. The goals and policies in the Housing Element encourage and facilitate the production of housing based on the varied income levels and special needs groups, which is the premise of the Element.
  - b. The goals and policies related to housing are to conserve and improve existing affordable housing, maximize housing opportunities throughout the community, assist in the provision of affordable housing, remove governmental and other constraints to housing investment, and promote fair and equal housing opportunities, which is the premise of the Element.

**SUBMITTED BY:** JOANNE COLETTA, PLANNING & DEVELOPMENT DIRECTOR

#### EXHIBITS

1. Resolution No. 2578
2. Housing Element Update Draft 2021-2029
3. Housing Programs Revised Redlined Version
4. General Plan EIR Addendum