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July 31, 2012

The Honorable Jim Janney and City Councilmembers  
City of Imperial Beach  
825 Imperial Beach Blvd.  
Imperial Beach, CA 91932

Dear Mayor Janney and City Councilmembers:

On behalf of the San Diego Housing Federation, I appreciate the opportunity to submit comments in advance of the City Council's public workshop on the City's Draft Fifth Housing Element.

First, we would like to applaud the City's efforts to provide affordable housing within the jurisdiction. During the Fourth Housing Element (from 2005 through 2012), the City added 24 units of affordable housing for very low, low, and moderate income households. That means Imperial Beach achieved 63 percent of its target for those income categories under the Regional Housing Needs Assessment, whereas the region as a whole attained only 21 percent of its target. In addition, we would like to praise the City for its support of the American Legion development, which will create 30 units of affordable housing and be an important community asset for many years.

As you are aware, the need for affordable housing within the City and throughout the region is acute. As a result, we urge the City Council to continue its commitment over the next Housing Element cycle (through 2020) by considering a number of programmatic modifications to the City's Draft Housing Element and City ordinances that can assist the City in further supporting the needs of its lower income residents. We have provided some suggestions for ways to improve upon your good work, as follows:

**1. Parking requirements**

We support your efforts to reduce parking requirements at mixed-use developments (page H-92) and would recommend those requirements be *further* reduced for affordable housing developments. The City of San Diego recently completed a thorough study of parking demands at affordable housing sites which demonstrated that affordable housing residents typically own fewer vehicles than their market-rate counterparts, and therefore do not need as many parking spaces. Unnecessary parking significantly increases the cost of providing affordable housing and may limit the amount of housing that can be provided on a particular site.

## 2. Accessory units

Accessory units (or “granny flats”) are one of the easiest ways to create affordable housing. However, the city currently prohibits such housing from large swaths of single-family areas, and as a result only 7 accessory units are forecast to be built annually in the city. We recommend that the policy be broadened to allow for accessory units in more residential areas.

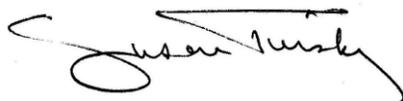
In addition, we would recommend the city’s ordinance requiring separate utility hook-ups for accessory units be changed so that an accessory unit may draw from the same water meter or gas/electric meter serving an existing home. Requiring only one utility hook-up per parcel will drop the cost of building accessory units and encourage more residents to build them in the city.

## 3. Affordable housing incentives

We commend the city for its plans to allow incentives for affordable housing (page H-90). The opportunity for fee deferrals, expedited permits, reduced setbacks, and increased height limits are all enticing. To make them even more attractive, we would recommend that these incentives be automatic for affordable housing developments, as opposed to optional (as is the case under the proposed zoning plan). This would encourage the construction of affordable housing, and help the City of Imperial Beach reach its Regional Housing Needs Assessment goal.

We thank you in advance for your consideration of these requests, and look forward to working with you to increase the supply of affordable housing in the City of Imperial Beach.

Sincerely,

A handwritten signature in black ink that reads "Susan Tinsky". The signature is fluid and cursive, with a long horizontal stroke at the top.

Susan Tinsky  
Executive Director