



CITY OF IMPERIAL BEACH HOUSING ELEMENT UPDATE

**Adopted:
January 23, 2013
(Resolution No.
2013-7287)
HCD Certified:
February 21, 2013**



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**5th Cycle
Year 2013 – 2021**

RESOLUTION NO. 2013-7287

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, CALIFORNIA, AMENDING THE GENERAL PLAN (GPA 100060) BY ADOPTING THE 2013-2020 IMPERIAL BEACH HOUSING ELEMENT AND ADOPTING ITS NEGATIVE DECLARATION. MF 1060.

WHEREAS, the draft 2013-2020 Housing Element was previously advertised for a 45-day public review period from October 18, 2012 to December 3, 2012 and routed to various agencies pursuant to the California Code of Regulations §13515 (14 CCR 13515) and California Government Code §65352 and comments from the California Department of Housing and Community Development (HCD) were received; and

WHEREAS, on August 1, 2012, a public workshop was conducted to obtain public input prior to transmitting the draft housing element for review to HCD; and

WHEREAS, on January 23, 2013, the City Council of the City of Imperial Beach held a duly advertised public hearing to consider comments on the 2013-2020 Housing Element; and

WHEREAS, the City Council of the City of Imperial Beach hereby finds that the proposed General Plan Amendment/ Local Coastal Plan Amendment (GPA 100060), pursuant to Government Code Section 65300.5, is internally consistent with the other elements and policies of the General Plan; and

WHEREAS, the City Council of the City Of Imperial Beach hereby finds that the 2013-2020 Housing Element is in substantial compliance with the California Housing Element Law (Government Code Section 65580 et seq); and

WHEREAS, the City Council of the City Of Imperial Beach hereby finds that the 2013-2020 Housing Element, pursuant to Government Code Section 65860, would be externally consistent with the Imperial Beach Zoning Ordinance as the Housing Element programs commit the City of Imperial Beach to amend any zoning provisions in conflict with state law and to be consistent with the Housing Element; and

WHEREAS, in compliance with Section 15070 of the California Environmental Quality Act (CEQA) Guidelines, a draft Negative Declaration (ND) was prepared and advertised for public review from November 1, 2012 to December 3, 2012 in accordance with CEQA and the draft ND was routed for state agency review through the Clearinghouse (SCH# 2012111006) from November 1, 2012 to November 30, 2012 and no comments were received; and

WHEREAS, the City Council has considered and heard any and all public testimony regarding the potential environmental impacts associated with this project, and hereby determines that:

1. the Final Negative Declaration (SCH # 2012111006) reflects the decision-making body's independent judgment and analysis;
2. the decision-making body has, pursuant to CEQA Guidelines Section 15074(b), considered the information contained in the Draft and Final Negative Declarations (SCH # 2012111006) and any written or verbal comments received during the public review period;
3. revisions, if any, in the project plans or proposals made by or agreed to by the project applicant, pursuant to CEQA Guidelines Section 15070(b)(1), would avoid the effects or mitigate the effects to a point where no identified significant effects would occur and no mitigation measures would be required;

4. Upon review of the document, the City Council has determined that the submitted Final Negative Declaration, inclusive of the Draft ND and any written comments received during the public review period and any amendments, is hereby certified based on substantial evidence in light of the whole record. This determination is based on the ND information that the proposed project impacts will not cause a significant effect on the environment as proposed, as conditioned, or as revised.

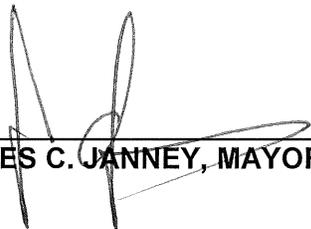
NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Imperial Beach that the 2013-2020 Imperial Beach Housing Element (Attachment 2) and its Final Negative Declaration (Attachment 3) are hereby adopted.

Appeal Process under the California Code of Civil Procedure (CCP): The time within which judicial review of a City Council decision must be sought is governed by Section 1094.6 of the CCP. A right to appeal a City Council decision is governed by CCP Section 1094.5 and Chapter 1.18 of the Imperial Beach Municipal Code.

PROTEST PROVISION: The 90-day period in which any party may file a protest, pursuant to Government Code Section 66020, of the fees, dedications or exactions imposed on any development project begins on the date of the final decision.

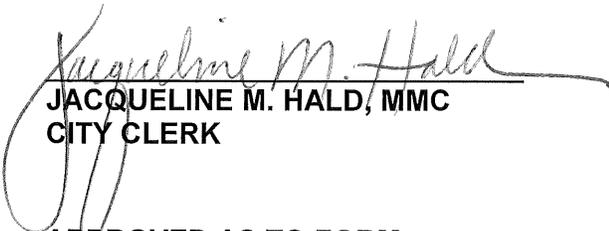
PASSED, APPROVED, AND ADOPTED by the City Council of the City of Imperial Beach at its meeting held on the 23rd day of January 2013, by the following vote:

AYES: COUNCILMEMBERS: SPRIGGS, BILBRAY, PATTON, BRAGG, JANNEY
NOES: COUNCILMEMBERS: NONE
ABSENT: COUNCILMEMBERS: NONE



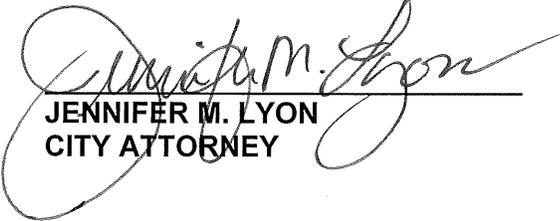
JAMES C. JANNEY, MAYOR

ATTEST:



JACQUELINE M. HALD, MMC
CITY CLERK

APPROVED AS TO FORM:



JENNIFER M. LYON
CITY ATTORNEY

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Section 1: Introduction

1.1 Statutory Framework

The Housing Element is an integral component of the City's General Plan. It addresses existing and future housing needs of all types for persons of all economic groups in the City. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in Imperial Beach.

Recognizing the importance of providing adequate housing in all communities, the State has mandated a Housing Element within every General Plan since 1969. It is one of the seven elements required by the State. Article 10.6, Section 65580 – 65589.8, Chapter 3 of Division 1 of Title 7 of the Government Code sets forth the legal requirements of the Housing Element and encourages the provision of affordable and decent housing in all communities to meet statewide goals. Specifically, Section 65580 states the element shall consist of ". . . an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources and scheduled programs for the preservation, improvement, and development of housing." The contents of the element must be consistent with the other elements of the General Plan [Government Code § 65300.5].

Meeting the housing needs established by the State of California is an important goal for the City of Imperial Beach. As the population of the State continues to grow and scarce resources decline, it becomes more difficult for local agencies to create adequate housing opportunities while maintaining a high standard of living for all citizens in the community. State law recognizes that housing needs may exceed available resources and, therefore, does not require that the City's quantified objectives be identical to the identified housing needs. This recognition of limitations is critical, especially during this period of financial uncertainties in both the public and private sectors.

Section 65583(b)(2) states, "It is recognized that the total housing needs... may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements... Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period."

This Housing Element (2013-2021) was created in compliance with State General Plan law pertaining to Housing Elements.

1.2 Purpose

The State of California has declared that "the availability of housing is of vital statewide importance and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order." In addition, government and the private sector should make an effort to provide a diversity of housing opportunities and accommodate regional housing needs through a cooperative effort, while maintaining a responsibility toward economic, environmental, fiscal factors and community goals within the General Plan. Further,

State Housing Element law requires “An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs.” The law requires:

- An analysis of population and employment trends;
- An analysis of the City’s fair share of the regional housing needs;
- An analysis of household characteristics;
- An inventory of suitable land for residential development;
- An analysis of the governmental and non-governmental constraints on the improvement, maintenance and development of housing;
- An analysis of special housing needs;
- An analysis of opportunities for energy conservation; and
- An analysis of publicly-assisted housing developments that may convert to non-assisted housing developments.

The purpose of these requirements is to develop an understanding of the existing and projected housing needs within the community and to set forth policies and schedules, which promote preservation, improvement and development of diverse types and costs of housing throughout Imperial Beach.

1.3 Organization

Imperial Beach’s Housing Element is organized into five primary sections:

- **Introduction:** Provides an overview of the purpose, scope, and organization of the Housing Element.
- **Community Profile:** Provides a summary of the City’s demographic and housing characteristics, and associated housing needs.
- **Housing Constraints:** Provides an assessment of the various constraints to housing development and preservation.
- **Housing Opportunities and Resources:** Provides an inventory of resources available for meeting the City’s existing and projected housing needs
- **Housing Plan:** Outlines the City’s commitments to providing and preserving housing opportunities in the community.

1.4 Relationship to Other Elements

State law [Government Code § 65300.5] requires that “...the General Plan and elements and parts thereof comprise an integrated, internally consistent, and compatible statement of policies...” The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement and development of housing within the City. The Housing Element was prepared to assure compatibility with the General Plan.

New State law requires that the Safety and Conservation Elements include an analysis and policies regarding flood hazard and management information upon revisions to the Housing Element. The Imperial Beach General Plan and Local Coastal Plan was updated in October 2010. Flood hazard and management information is included in the Safety Element. The flood hazard information is incorporated in this Housing Element as part of the discussions on environmental constraints to housing development. None of the sites identified for potential residential development fall within a flood plain.

1.5 Citizen Participation

Public participation for the 2013-2021 Housing Element included a Housing Element study session with the City Council held on August 1, 2012. Members of the community were invited to address concerns and give input on the contents of the Housing Element. Special invitations were sent to housing developers, housing professionals, and agencies and organizations that provide supportive housing services to lower and moderate income households and persons with special needs (see Appendix A for mailing list). Notices were posted in both English and Spanish in the local newspaper, at the City Hall, the public library, and at affordable housing complexes in the City. In addition, a public review draft, dated August 1, 2012, was prepared and made available to the community for a 60-day review period from August 8, 2012 to October 6, 2012. Copies of the draft were made available at City Hall and the County public library at 810 Imperial Beach Blvd, and available on the City website (www.cityofib.com at the Public Notices tab under the Government pull-down menu).

Section 2: Community Profile

City of Imperial Beach

Imperial Beach, the "Most Southwesterly City in the Continental United States," is one of 18 incorporated cities located within San Diego County. It is bordered on the north by the Silver Strand Training Complex (SSTC), formerly known as the Naval Radio Receiving Facility (NRRF) within the City of Coronado's jurisdiction and the southern shore of San Diego Bay, on the east by the City of San Diego, on the south by the U.S./Mexican border, and on the west by the Pacific Ocean.

The first settlers came to the area known as Imperial Beach in the 1880s. The first subdivision was filed in 1887. Early subdivisions were intended to create a summer retreat beach resort for the residents of the warmer Imperial Valley, hence the name Imperial Beach. Imperial Beach was incorporated as a General Law City on July 18, 1956.

Imperial Beach contains an area of 4.5 square miles. Its coastal setting and Mediterranean climate provide a unique and attractive living environment. The City is almost entirely built out with a few vacant parcels. Future development will primarily take place through upgrading and reuse of existing parcels.

The City strives to achieve a balanced housing stock that meets the varied needs of all income segments of the community. To understand the City's housing needs, the nature of the existing housing stock and the housing market are comprehensively evaluated. This section of the Housing Element discusses the major components of housing needs in Imperial Beach, including population, household, economic and housing stock characteristics. Each of these components is presented in a regional context, and, where relevant, in the context of other nearby communities. This assessment serves as the basis for identifying the appropriate goals, policies, and programs for the City to implement during the 2013-2021 Housing Element cycle.

Data Sources

This section utilizes a variety of sources to compile the most updated data, to the extent feasible. Data sources include: Decennial Census; America Community Surveys; San Diego Association of Governments (SANDAG) projections and forecasts; State Employment Development Department employment and wage data; Home Mortgage Disclosure Act (HMDA) data on mortgage financing; and Dataquick home sales data; among others.

Figure H-1: Regional Location



The Census Bureau completely restructured its method of collecting and updating demographic and housing information by eliminating the “long form” in the 2010 Census and by introducing the American Community Survey (ACS). The ACS is an annual sample survey designed to provide more detailed information about a community. Depending on the size of the community, ACS may collect annual estimates, three-year estimates, or five-year estimates. Given Imperial Beach’s population of over 20,000, ACS covers the City at least once every three years. Different variables are measured by ACS at different times. Therefore, certain variable are obtained from the 2006-2010 five-year ACS while others are from the 2008-2010 three-year ACS.

2.1 Population Characteristics

Understanding the characteristics of a population is vital in the process of planning for the future needs of a community. Issues such as population growth, race/ethnicity, age, and employment trends are factors that combine to influence 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.

2.1.1 Population Growth

The Census reported that Imperial Beach’s population declined from 26,992 in 2000 to 26,324 in 2010 (Table H-1). The SANDAG 2050 Regional Growth Forecast estimates that the Imperial Beach population will reach 28,230 in 2020. Although population growth in the City has been significantly slower than in the County, population trends for the City are in line with those of other south and east County jurisdictions such as Lemon Grove, La Mesa, Santee, and National City.

Jurisdictions	Population				Percent Change	
	1990	2000	2010	2020*	1990-2000	2000-2010
Chula Vista	135,163	173,860	243,916	267,427	28.6%	40.3%
Coronado	26,540	24,100	18,912	18,579	-9.2%	-21.5%
El Cajon	88,693	94,819	99,478	109,623	6.9%	4.9%
Imperial Beach	26,512	26,992	26,324	28,230	1.8%	-2.5%
La Mesa	52,931	54,751	57,065	62,100	3.4%	4.2%
Lemon Grove	23,984	24,954	25,320	26,688	4.0%	1.5%
National City	54,249	54,405	58,582	62,300	0.3%	7.7%
San Diego	1,110,549	1,223,341	1,307,402	1,542,528	10.2%	6.9%
Santee	52,902	53,090	53,413	64,517	0.4%	0.6%
San Diego County	2,498,016	2,813,833	3,095,313	3,535,000	12.6%	10.0%

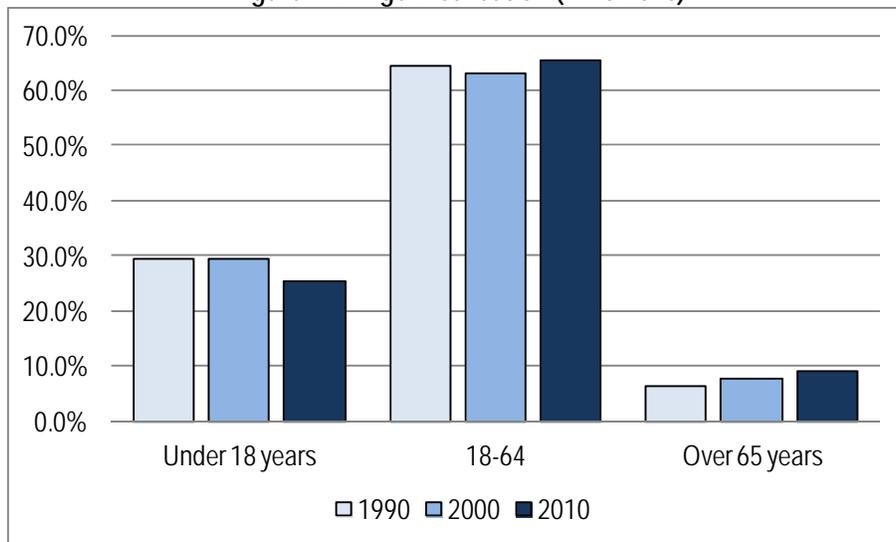
* Represents an estimate from the SANDAG 2050 Regional Growth Forecast.
Sources: Bureau of the Census (1990-2010) and SANDAG Regional Growth Forecast Update (2010).

2.1.2 Age Characteristics

A community's current and future housing needs are influenced in part by the age characteristics of residents. Typically, each age group has distinct lifestyles, family structures and sizes, ability to earn incomes, and therefore, housing preferences. As people move through each stage of life, housing needs and preferences change. Traditional assumptions are that the young adult population (20 to 34 years old) tends to favor apartments, low to moderate cost townhomes/condominiums, and smaller single-family units. The adult population (35 to 64 years old) represents the major market for moderate to relatively high cost condominiums and single-family homes. The senior population (65 years and older) tends to generate demand for low to moderate cost apartments and condominiums, group quarters, and mobile homes. In order to create a balanced and sustainable community, it is important to provide housing options that suit the needs of various age groups.

The population of Imperial Beach is, as measured by the median age of its residents, significantly younger than in neighboring communities or the County as a whole. In 2010, Imperial Beach's median age was 31 years; nearly four years younger than the County's median age. The lower median age is due to the larger percentage of school age children under 18 (25 percent of the population in 2010) and the smaller percentage of seniors over 65 years of age (nine percent in 2010) in the City than in other San Diego County communities. Specifically, the proportion of senior residents in neighboring cities in 2010 was noticeably higher than in Imperial Beach. Figure H-2 compares changes in the age composition of Imperial Beach's population from 1990 to 2010, while Table H-2 compares the percentage of individuals under 18, over 65, and the median age of Imperial Beach with nearby communities.

Figure H-2: Age Distribution (1990-2010)



Sources: Bureau of the Census, 1990-2010.

Jurisdiction	Under 18 years			Over 65 years			Median Age
	1990	2000	2010	1990	2000	2010	
Chula Vista	26.2%	28.8%	27.9%	11.4%	11.2%	10.0%	33.7
Coronado	15.9%	16.0%	20.4%	14.6%	15.8%	18.4%	40.7
El Cajon	26.3%	27.8%	25.7%	11.1%	11.3%	11.0%	33.7
Imperial Beach	29.3%	29.4%	25.4%	6.2%	7.5%	9.0%	31.0
La Mesa	17.2%	19.8%	19.6%	18.2%	17.1%	14.2%	37.1
Lemon Grove	26.5%	27.6%	25.5%	14.1%	12.0%	11.2%	35.0
National City	27.8%	30.1%	25.5%	9.3%	11.2%	10.6%	30.2
San Diego	23.1%	23.9%	21.4%	10.2%	10.4%	10.7%	33.6
Santee	29.0%	28.3%	23.8%	8.4%	8.9%	10.7%	37.2
San Diego County	24.5%	25.6%	23.4%	10.9%	11.1%	11.4%	34.6
<i>Source: Bureau of the Census (1990-2010).</i>							

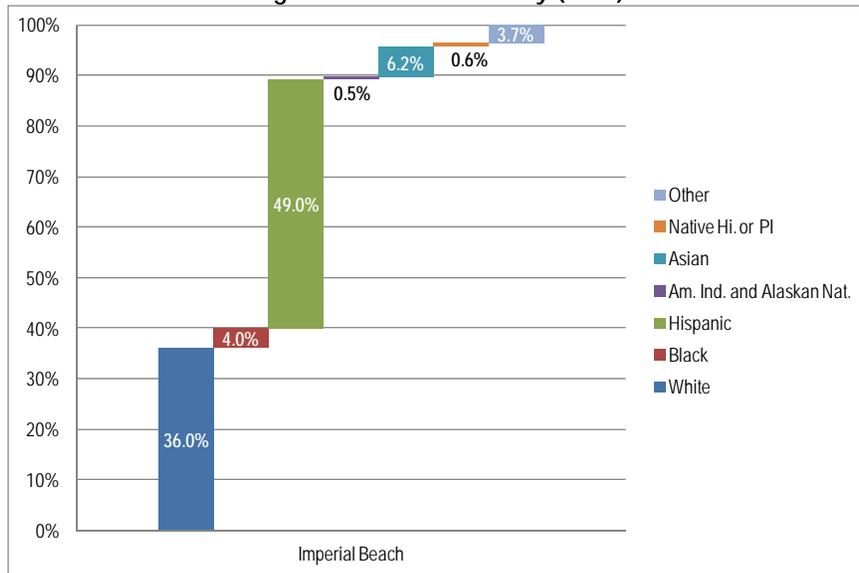
2.1.3 Racial/Ethnic Composition

Race/ethnicity of the population is important to an analysis of housing needs and conditions for several reasons. A community's racial and ethnic composition may have implications for housing needs to the extent that different groups have different household characteristics, income levels, and cultural backgrounds that may affect their housing needs and preferences. Recent studies have also suggested that different racial and ethnic groups differ in their attitudes toward and/or tolerance for "housing problems" as defined by the federal Department of Housing and Urban Development (HUD), including overcrowding and housing cost burden.¹ According to these studies, perceptions regarding housing density and overcrowding, as well as the cultural practices of living with extended families tend to vary among racial and ethnic groups.

In 2010, Imperial Beach was 49 percent Hispanic, 36 percent White, six percent Asian, four percent Black, less than one percent Pacific Islander and American Indian, and four percent Other races (Figure H-3). Imperial Beach had a noticeably smaller proportion of White residents and larger proportion of Hispanic residents compared to the County (Table H-3). The City's proportion of Black residents and those of "Other" racial and ethnic backgrounds was roughly similar to that of neighboring jurisdictions and within the County. Asian/Pacific Islander's comprised a smaller proportion of Imperial Beach residents compared to Chula Vista, National City and the City of San Diego, but the proportion in this group was similar in La Mesa and Lemon Grove. In general, Hispanic and Asian/Pacific Islander households exhibit a greater propensity for living in extended families or other household arrangements than the White population. Communities with larger proportions of Hispanic and Asian households tend to have larger average household sizes.

¹ Studies include the following: "The Determinants of Household Overcrowding and the Role of Immigration in Southern California" by S.Y. Choi (1993); "The Changing Problem of Overcrowding" by D. Myers, William Baer, and S.Y. Choi (1996); and "Immigration Cohorts and Residential Overcrowding in Southern California" by D. Myers and S.W. Lee (1996).

Figure H-3: Race/Ethnicity (2010)



Source: Bureau of the Census (2010).

Table H-3: Racial Composition (2010)

Jurisdiction	White	Black	Hispanic	American Indian and Alaska Native	Asian	Native Hawaiian or Pacific Islander	Other
Chula Vista	20.4%	4.1%	58.2%	0.2%	13.8%	0.5%	2.8%
Coronado	79.4%	2.0%	12.2%	0.4%	2.9%	0.3%	2.9%
El Cajon	56.8%	6.0%	28.2%	0.5%	3.4%	0.4%	4.8%
Imperial Beach	36.0%	4.0%	49.0%	0.5%	6.2%	0.6%	3.7%
La Mesa	61.9%	7.2%	20.5%	0.4%	5.5%	0.5%	3.9%
Lemon Grove	34.7%	12.9%	41.2%	0.4%	6.1%	1.0%	3.6%
National City	11.7%	4.5%	63.0%	0.3%	17.8%	0.7%	2.0%
San Diego	45.1%	6.3%	28.8%	0.3%	15.6%	0.4%	3.5%
Santee	73.6%	1.8%	16.3%	0.5%	3.7%	0.4%	3.6%
San Diego County	48.5%	4.7%	32.0%	0.5%	10.6%	0.4%	3.3%

Source: Bureau of the Census (2010).

2.1.4 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. 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). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

In 2000, the three largest occupational categories for City residents were Education/Health/Social Services, Arts/Entertainment/Recreation Services and Retail Trade occupations (Table H-4). These categories accounted for a large proportion (42 percent) of the jobs held by Imperial Beach residents. By comparison, these occupations accounted for 40 percent of the jobs held by County residents. The proportion of City residents holding all other occupations was roughly comparable to residents of the County.

Table H-5 displays mean annual wage data for occupations compiled by the California Employment Development Department (EDD) for the San Diego Metropolitan Statistical Area in 2011. Table H-5 shows that the food preparation and serving, personal care and service, building and maintenance, and farming, fishing and forestry occupations offer the lowest wages.

According to the ACS, between 2006 and 2010, approximately 35 percent of Imperial Beach residents worked in Education/Health/Social Services and Arts/Entertainment/Recreation Services. These fields usually generate employment at the moderate income levels. Other major employment sectors for Imperial Beach include Retail Trade, which generally provides jobs at lower income scales, as shown in Table H-5.

Industry	2000 Census		2006-2010 ACS	
	% of City Employment	% of Region Employment	% of City Employment	% of Region Employment
Agriculture, Mining	0.5%	0.7%	1.5%	0.7%
Construction	8.6%	6.6%	7.0%	7.2%
Manufacturing	9.1%	11.0%	6.3%	9.2%
Transportation, Communication, Utilities	4.1%	3.5%	4.8%	3.8%
Wholesale Trade	2.8%	3.3%	3.2%	2.9%
Retail Trade	13.2%	11.3%	12.6%	10.8%
Finance, Insurance and Real Estate	5.6%	7.1%	7.2%	7.4%
Professional Services	9.9%	13.3%	10.9%	14.2%
Education, health, and social services	15.3%	19.3%	20.5%	19.9%
Arts, entertainment, and recreation	13.8%	9.6%	14.1%	10.6%
Other Services	7.7%	5.2%	4.5%	7.9%
Public Administration	9.4%	5.4%	7.4%	5.4%
Total	100.0%	100.0%	100.0%	100.0%
<i>Sources: Bureau of the Census (2000) and American Community Survey (ACS) (2006-2010).</i>				

Occupations	Average Salary
Management	\$117,046
Legal	\$105,882
Healthcare Practitioners and Technical	\$89,872
Architecture and Engineering	\$83,115
Computer and Mathematical	\$82,631
Business and Financial Operations	\$71,815
Education, Training and Library	\$60,992
Construction and Extraction	\$51,871
Protective Service	\$50,581
Community and Social Service	\$49,734
Installation, Maintenance and Repair	\$45,202
Sales	\$38,263
Office and Administrative Support	\$37,260
Production	\$34,324
Transportation and Material Moving	\$32,255
Healthcare Support	\$30,880
Building, Grounds Cleaning, and Maintenance	\$26,928
Farming, Fishing and Forestry	\$26,009
Food Preparation and Serving Related	\$22,133
All Occupations	\$50,800
<i>Source: California Employment Development Division, Occupational Wage data (2011).</i>	

2.2 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. This section details the various household characteristics affecting housing needs.

2.2.1 Household Type and Size

According to the 2010 Census, 1,086,865 households occupied housing units in San Diego County. Of these households, 9,112 households (less than one percent) were located in Imperial Beach. Of the 9,112 households in Imperial Beach, 23 percent were single-persons and 16 percent were headed by seniors (65+). Single person households made up a higher proportion of total households in Imperial Beach than nearby Chula Vista and National City, while senior-headed households represented a noticeably smaller proportion of Imperial Beach's total households than nearly all jurisdictions and countywide. Conversely, 34 percent of Imperial Beach's households consisted of families with children; a larger proportion than that found most cities and the County, with the exception of nearby Chula Vista and National City. The proportion of single-parent households is second largest among jurisdictions compared in

Table H-6. Furthermore, the proportion of large renter-households is significantly greater than the proportion of these households in other jurisdictions and throughout the County.

Jurisdiction	Single Person Households	Senior Headed Households	Families with Children	Single-Parent Households	Large Households	
					Owner-Occupied	Renter-Occupied
Chula Vista	16.7%	17.8%	42.0%	11.7%	59.2%	40.8%
Coronado	30.8%	31.4%	28.5%	6.8%	42.3%	57.7%
El Cajon	23.1%	18.7%	35.2%	12.1%	31.6%	68.4%
Imperial Beach	22.5%	15.9%	34.1%	14.6%	25.9%	74.1%
La Mesa	32.7%	22.2%	24.8%	8.8%	46.8%	53.2%
Lemon Grove	22.9%	20.4%	32.8%	11.5%	56.2%	43.8%
National City	17.4%	21.9%	39.2%	15.2%	39.0%	61.0%
San Diego	28.0%	17.8%	27.5%	7.8%	48.9%	51.1%
Santee	20.6%	19.1%	33.4%	9.9%	63.5%	36.5%
San Diego County	24.0%	19.8%	31.3%	8.7%	51.8%	48.2%

Source: Bureau of the Census (2010).

Table H-7 shows that, in 2010, Imperial Beach households consisted mostly of families (68 percent). Slightly more of these families were married couples without children, 1,955 families (22 percent), compared to 1,780 married couple families (20 percent) with children. However, the largest group of family-households was other families such as single-parent households. The greatest change from 2000 to 2010 was the 20-percent decrease in married couple families with children, followed by the ten-percent increase in other non-family households. Other non-family households are defined as households which do not have any members related to the householder.

Household Types	1990		2000		2010		Percent Change			
							1990-2000		2000-2010	
	#	%	#	%	#	%	#	%	#	%
Families	6,617	73.1%	6,449	69.6%	6,213	68.2%	-168	-2.5%	-236	-3.7%
Married w/ Children	2,895	32.0%	2,226	24.0%	1,780	19.5%	-669	-23.1%	-446	-20.0%
Married w/o Children	2,153	23.8%	1,961	21.1%	1,955	21.5%	-192	-8.9%	-6	-0.3%
Other Families	1,659	18.3%	2,262	24.5%	2,478	27.2%	603	36.3%	216	9.5%
Non-Families	2,438	26.9%	2,823	30.4%	2,899	31.8%	385	15.8%	76	2.7%
Single	1,611	17.8%	1,983	21.3%	2,046	22.4%	372	23.1%	63	3.2%
Other Non-Families	827	9.1%	840	9.1%	853	9.4%	13	1.6%	13	1.5%
Total Households	9,055	100.0%	9,272	100.0%	9,112	100.0%	217	2.4%	-160	-1.7%

Sources: Bureau of the Census (1990-2010).

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. In 2010, the average number of persons per household in the San Diego region ranged from 2.1 to 3.5, with a countywide average of 2.75 persons per household. Imperial Beach had an average of 2.82 persons per household,

representing a small decrease from 2000, when the Census reported 2.84 persons per household. Table H-8 compares household size in Imperial Beach to household size in surrounding cities and the County. The average household size in Imperial Beach was substantially lower than neighboring Chula Vista and National City, but higher than many other jurisdictions compared in the table. SANDAG estimates that average household size in the region will increase slightly over the next 20 years.

Jurisdiction	Average Household Size (2010)	Projected Average Household Size (2030)
Chula Vista	3.21	3.13
Coronado	2.31	2.37
El Cajon	2.84	2.86
Imperial Beach	2.82	3.00
La Mesa	2.30	2.35
Lemon Grove	2.96	3.02
National City	3.41	3.57
San Diego	2.60	2.70
Santee	2.72	2.93
San Diego Region	2.75	2.87
<i>Sources: Bureau of the Census (2010) and SANDAG Regional Forecast Update (2030).</i>		

2.2.2 Household Income

Household income is an indication of wealth in a community and therefore is directly connected to the ability to afford housing. As household income increases, the more likely that household is a homeowner. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of households occupying unsound and overcrowded housing increases.

For planning and funding purposes, the California State Department of Housing and Community Development (HCD) has developed the following income categories based on the Area Median Income (AMI) of a metropolitan area (such as San Diego County):

- 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

Combined, the extremely low, very low, and low income groups are referred to as lower income. Between 2006 and 2008, approximately 41 percent of Imperial Beach households earned

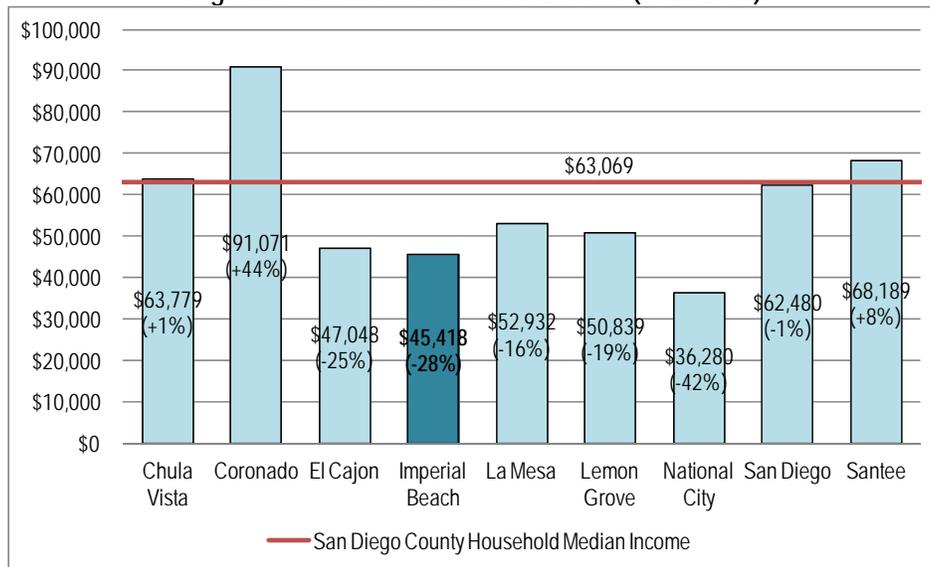
moderate or above moderate incomes (Table H-9), while 59 percent of households had incomes in the extremely low, very low, and low income levels.²

Income Category (% of County AMI)	Households	Percent
Extremely Low (30% AMI or less)	1,380	15.8%
Very Low (31 to 50% AMI)	1,560	17.9%
Low (51 to 80% AMI)	2,190	25.1%
Moderate or Above (over 80% AMI)	3,595	41.2%
Total	8,725	100.0%

Sources: Department of Housing and Urban Development (HUD) and Comprehensive Housing Affordability Strategy (CHAS) (2008).

Household incomes in Imperial Beach tend to be lower than those in the region as a whole. Median household income in the City was \$35,882 in 2000, compared to the San Diego County median household income of \$47,067. The ACS estimates that the median household income in Imperial Beach between 2006 and 2010 was \$45,418, compared to \$63,069 in the County. Figure H-4 compares household income in Imperial Beach with the household income of neighboring jurisdictions and the San Diego region as a whole between 2006 and 2010. As shown, median household income Imperial Beach was 28 percent below the County median. National City had the lowest median income, recorded at 42 percent below the County median.

Figure H-4: Median Household Income (2006-2010)



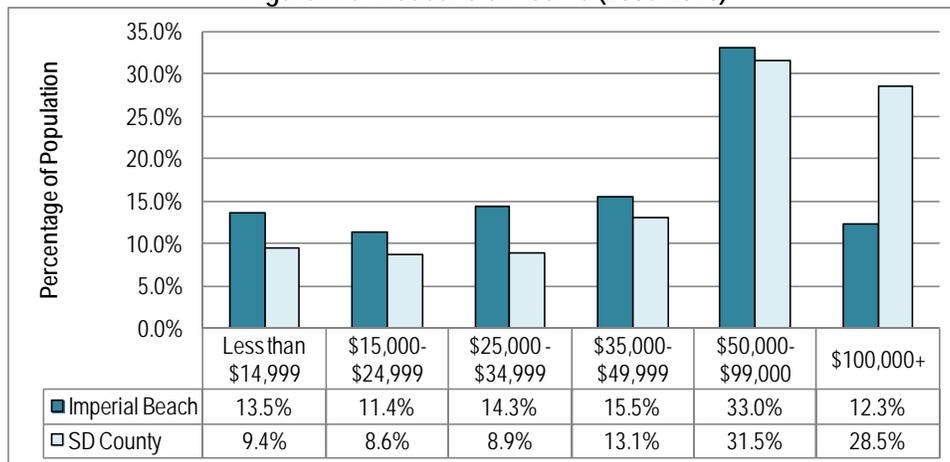
Source: ACS (2006-2010).

According to the 2006-2010 ACS, close to 40 percent of Imperial Beach households had incomes lower than \$25,000 (Figure H-5). Approximately 30 percent of the City's households earned incomes between \$25,000 and \$49,999, while 33 percent had incomes between

² Data was obtained from the Comprehensive Housing Affordability Strategy (CHAS) prepared for HUD by the Census Bureau using 2000 Census data. CHAS data does not provide a breakdown of household income for those with more than 80 percent AMI as those households are not qualified for federal housing programs.

\$50,000 and \$99,999. Only 12 percent of Imperial Beach households earned \$100,000 or more between 2006 and 2010. By comparison, the County’s income distribution during this time period was skewed toward the higher income categories, explaining the SANDAG estimates of higher median household income in the County than in Imperial Beach.

Figure H-5: Household Income (2006-2010)



Source: ACS (2006-2010).

2.3 Housing Problems

2.3.1 Overall Housing Problems

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Imperial Beach. Detailed CHAS data is displayed in Table H-10. 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.

The types of problems vary according to household income, type, and tenure. Some highlights include:

- In general, renter-households had a higher level of housing problems (64 percent) compared to owner-households (42 percent).
- Large renter-families had the highest level of housing problems regardless of income level (84 percent).
- Extremely low income (78 percent) and very low income households (87 percent) had the highest incidence of housing problems.
- Housing problems disproportionately affected elderly renters (66 percent) compared to elderly owners (18 percent).

Household by Type, Income, and Housing Problem	Renters				Owners			Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Large Families	Total Owners	
Extremely Low Income (0-30% AMI)	235	525	125	1,130	110	20	250	1,380
With any housing problem	205	445	125	975	50	0	95	1,070
With cost burden >30%	70	15	0	85	20	0	20	105
With cost burden > 50%	135	430	110	875	30	20	75	950
Very Low Income (31-50% AMI)	30	610	220	1,255	160	10	305	1,560
With any housing problem	15	610	220	1,240	40	10	120	1,360
With cost burden >30%	15	370	90	640	10	0	10	650
With cost burden > 50%	0	215	125	570	30	10	110	680
Low Income (51-80% AMI)	95	845	160	1,675	195	40	515	2,190
With any housing problem	75	575	130	1,170	15	20	230	1,400
With cost burden >30%	65	450	25	895	0	0	65	960
With cost burden > 50%	10	85	0	130	15	20	165	295
Total Households	450	2,910	710	6,005	785	195	2,720	8,725
With any housing problem	295	1,825	595	3,815	140	110	1,130	4,945

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.
Source: HUD CHAS, (2006-2008).

2.3.2 Overcrowding

The combination of low incomes and high housing costs has forced many households to live in overcrowded housing conditions. “Overcrowding” is generally defined as a housing unit occupied by more than one person per room in house (including living room and dining rooms, but excluding hallways, kitchen, and bathrooms). Overcrowding can indicate that a community does not have an adequate supply of affordable housing, especially for large families. Overcrowding tends to accelerate the deterioration of housing. Therefore, maintaining a reasonable level of occupancy and alleviating overcrowding are critical to enhancing quality of life.

In 2000, 19 percent of Imperial Beach households lived in overcrowded conditions (Table H-11). Overcrowding disproportionately affected renters (24 percent of renters versus just eight percent of owners), indicating overcrowding may be the result of an inadequate supply of larger sized rental units. While 31 percent of occupied housing units in the City had more than three bedrooms (the minimum size considered large enough to avoid most overcrowding issues for large households), only a small portion of these units (11 percent) were occupied by renters.

Between 2006 and 2010, overcrowding in the City declined dramatically, according to the ACS. Only seven percent of Imperial Beach households lived in overcrowded conditions during this time period. Overcrowding did still appear to disproportionately affect renters, however. Approximately nine percent of renter households were overcrowded compared to just five percent of owner households. This decrease may be attributable to the significant decrease in families with children between 2000 and 2010 as reported by the Census.

Table H-11: Overcrowded Housing Units (1990-2010)						
Overcrowding	Owner Households		Renter Households		Total Households	
	Number	% of Owners	Number	% of Renters	Number	% of Total
1990						
Total Overcrowded (>1.0 persons/room)	138	5.2%	1,292	20.1%	1,430	15.7%
Severely Overcrowded (>1.5 persons/room)	64	2.4%	494	7.7%	558	6.1%
2000						
Total Overcrowded (>1.0 persons/room)	213	7.7%	1,567	24.1%	1,780	19.2%
Severely Overcrowded (>1.5 persons/room)	93	3.3%	898	13.8%	991	10.7%
2006-2010						
Total Overcrowded (>1.0 persons/room)	71	2.5%	875	13.9%	946	10.3%
Severely Overcrowded (>1.5 persons/room)	33	1.2%	619	9.8%	652	7.1%
<i>Sources: Bureau of the Census (1990-2000) and ACS (2006-2010).</i>						

2.3.3 Cost Burden (Overpayment)

Measuring the portion of a household's gross income that is spent for housing is an indicator of the dynamics of demand and supply. This measurement is often expressed in terms of "over payers": households paying an excessive amount of their income for housing, therefore decreasing the amount of disposable income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community. Federal and state agencies use cost burden/overpayment indicators to determine the extent and level of funding and support that should be allocated to a community. State and federal programs typically define over-payers as those paying over 30 percent of household income for housing costs. A household is considered experiencing a *severe* cost burden if it spends more than 50 percent of its gross income on housing.

Table H-12 provides overpayment detail by income group for Imperial Beach. Approximately 71 percent of lower income households overpaid for housing between 2006 and 2008 versus 20 percent of moderate and above moderate income households. The CHAS data indicate cost burden impacted renter-households more as a group than owner-households. Approximately 56 percent of renter-households paid more than 30 percent of their income on housing compared to 37 percent of owner-households. Extremely low and very low income renter-households experienced the highest incidence of cost burden (85 percent and 96 percent, respectively).

ACS data echo the finding that renters were more impacted by cost burden than owners. Between 2005 and 2009, ACS reported that 40 percent of owner-occupied households in Imperial Beach spent more than 30 percent of their household income on housing. By contrast, a higher percentage of renter-households (55 percent) overpaid for housing.

Household Income Group	Total Renters	Total Owners	Total
Extremely Low (<=30% AMI)	1,130	250	1,380
Cost Burden >30%	960	95	1,055
%Cost Burden >30%	85.0%	38.0%	76.4%
Very Low (>30% to <=50% AMI)	1,255	305	1,560
Cost Burden >30%	1,210	120	1,330
%Cost Burden >30%	96.4%	39.3%	85.3%
Low (>50% to <=80% AMI)	1,675	515	2,190
Cost Burden >30%	1,025	230	1,255
%Cost Burden >30%	61.2%	44.7%	57.3%
Moderate & Above Moderate (>80% AMI)	1,945	1,650	3,595
Cost Burden >30%	170	550	720
%Cost Burden >30%	8.7%	33.3%	20.0%
Total	6,005	2,720	8,725
Cost Burden >30%	3,365	995	4,360
%Cost Burden >30%	56.0%	36.6%	50.0%
<i>Note: Totals may not be exact due to rounding. Please note the Census Bureau uses a special rounding scheme for special tabulations such as these. Therefore, totals may not match other census datasets.</i>			
<i>Source: CHAS (2006-2008).</i>			

2.4 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 one's employment and income, family characteristics, disability and household characteristics, among other factors. Pursuant to State law, the Housing Element must address the following special needs groups: elderly, persons with disabilities (including those with developmental disabilities), large households, single-parent households (particularly female-headed households), persons living in poverty, farmworkers, and the homeless (Table H-13). Many of these groups overlap, for example some farmworkers are homeless, and many elderly people have a disability of some type.

Special Needs Group	# of People or Households	Number of Owners	% Owner	Number of Renters	% Renter	% of Total Households or Population
Households with Seniors	1,803	--	--	--	--	19.8%
Senior Headed Households	1,451	856	59.0%	595	41.0%	15.9%
Seniors Living Alone	550	268	48.7%	282	51.3%	6.0%
Persons with Disabilities*	2,701	--	--	--	--	10.7%
Large Households	1,311	339	25.9%	972	74.1%	14.4%
Single-Parent Households	1,329	--	--	--	--	14.6%
Female Headed Households with children	946	--	--	--	--	10.4%
Farmworkers*	165	--	--	--	--	1.5%
Homeless	28	--	--	--	--	0.1%

* = 2010 Census data not available. Estimate is from 2008-2010 ACS.
Sources: Bureau of the Census (2000-2010) and Regional Housing Task Force on the Homeless (2011).

The following sections provide a detailed discussion of the housing needs facing each particular group as well as programs and services available to address their housing needs.

2.4.1 Seniors

Many senior-headed households have special needs due to relatively low or fixed incomes, disabilities or limitations, and health care or dependency needs. Limited discretionary income and impaired physical mobility can make it difficult for seniors to maintain their homes. Many elderly also rely on public transportation, especially those with disabilities.

Table H-14 shows that 2,373 persons were age 65 and over in Imperial Beach in 2010. This accounted for about nine percent of residents, noticeably lower than the percentage found in the region as a whole. Furthermore, 16 percent of City households were headed by someone 65 years old or older. Of these senior-headed households, the majority (59 percent) owned their homes, while the remainder (41 percent) rented their homes. Housing cost burden has a greater impact on lower income elderly renters. According to CHAS data, 66 percent of these households overpaid for housing between 2006 and 2008.

Aside from overpayment problems faced by seniors due to their relatively fixed incomes, many seniors also live with various disabilities. Roughly 48 percent of Imperial Beach's senior population was listed as having one or more disabilities in 2000 by the Census. Among these disabilities, the most common were physical disabilities (33 percent) and disabilities that limited/prevented seniors from going outside the home (25 percent). No updated data on disability is available from the Census.

Jurisdiction	Total	Age 65+	Percent Age 65+
Chula Vista	243,916	24,439	10.0%
Coronado	18,912	3,479	18.4%
El Cajon	99,478	10,930	11.0%
Imperial Beach	26,324	2,373	9.0%
La Mesa	57,065	8,088	14.2%
Lemon Grove	25,320	2,829	11.2%
National City	58,582	6,203	10.6%
San Diego	1,307,402	139,637	10.7%
Santee	53,413	5,740	10.7%
San Diego Region	3,095,313	351,425	11.4%
<i>Source: Bureau of the Census (2010).</i>			

Resources

The City of Imperial Beach has a Senior Center that is open to residents age 50 and over, as well as individuals with disabilities. The Center offers a variety of life-enriching classes, activities, hobbies, and a fun social environment. The Center also serves as a great resource center for seniors that offers free legal service, free tax assistance during tax time, and a blood pressure clinic once a month.

Four residential care facilities for the elderly are located in Imperial Beach. Combined, these facilities provide a total of 56 beds.

2.4.2 Persons with Disabilities

Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for oneself. Thus, disabled persons often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. Some residents suffer from disabilities that require living in a supportive or institutional setting.

Disability Status

The 2010 Census did not collect information on disability. According to 2008-2010 ACS data, approximately 11 percent of Imperial Beach residents had a disability. The ACS also tallied the number of disabilities by type for residents with one or more disabilities. Among the disabilities tallied, cognitive, ambulatory, and independent living difficulties were almost equally prevalent. However, among the elderly population, ambulatory and independent living difficulties were most prevalent (Table H-15).

Disability Type	% of Disabilities Tallied			
	Age 5 to 17	Age 18 to 64	Age 65+	Total
With a hearing difficulty	18.1%	11.1%	20.7%	16.3%
With a vision difficulty	5.3%	6.6%	3.5%	5.0%
With a cognitive difficulty	54.7%	29.3%	12.4%	23.3%
With an ambulatory difficulty	13.6%	22.3%	28.6%	24.6%
With a self-care difficulty	8.3%	4.6%	12.8%	8.8%
With an independent living difficulty	--	26.1%	22.0%	22.0%
Total Disabled Persons	375	1,991	2,182	4,548
<i>Note: A person can have multiple disabilities. Source: Bureau of the Census, ACS (2008-2010).</i>				

Developmental Disabilities

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

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

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This equates to 394 persons in the City of Imperial Beach with developmental disabilities, based on the 2010 Census population.

According to the State’s Department of Developmental Services, approximately 294 persons with developmental disabilities have sought out services in the City of Imperial Beach in 2011. Most of these individuals reside in a private home with their parent or guardian and 96 of these persons with developmental disabilities were under the age of 18.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

Resources

Four factors – affordability, design, location, and discrimination – significantly limit the supply of housing available to households of persons with disabilities. The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. “Barrier free” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group. Incorporating barrier-free design in all new multi-family housing is especially important to provide the widest range of choices for the disabled.

State and federal legislation mandate that a specified portion of units in new or rehabilitated multi-family apartment complexes be accessible to individuals with limited physical mobility. The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. Although the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint, the City does not have a formal procedure for processing accommodation requests. The City will adopt a formal procedure for review and approval of reasonable accommodation requests.

2.4.3 Large Households

Large households are defined as those consisting of five or more members. These households comprise a special need group because of the often limited supply of adequately sized and affordable housing units in a community. To save for other basic necessities such as food, clothing and medical care, it is common for lower income large households to reside in smaller units, which frequently results in overcrowding and can result in accelerated unit deterioration.

According to the 2000 Census, 14 percent or 1,292 of Imperial Beach City households were large households. Table H-16 compares the number of large households in Imperial Beach to that of the San Diego region. In 2010, about 15 percent of households in Imperial Beach consisted of five or more persons, similar to region wide proportion of 14 percent.

Jurisdiction	Persons in Household			Total Households
	5	6	7+	
Imperial Beach	727	315	269	9,112
Percent of Total	8.0%	3.5%	3.0%	100.0%
San Diego Region	80,185	36,149	32,447	1,086,865
Percent of Total	7.4%	3.3%	3.0%	100.0%

Source: Bureau of the Census (2010).

Generally, two-bedroom units are considered to be the most common bedroom type in the housing market. However, the 2000 Census reported 2,864 units (30 percent) of the City’s housing stock had three or more bedrooms. The predominant rental unit type was two-bedroom units, representing 40 percent of the rental housing. The majority of owner-households consisted of three-bedrooms, representing 54 percent of owner-occupied housing units. Four or

more bedroom units represented only five percent of all occupied housing (one percent of all rental units and 14 percent of all owner-occupied units) in the City of Imperial Beach.

According to the 2010 Census, there were 1,311 large households in the City. The 2006-2010 ACS estimated that 3,271 housing units in Imperial Beach had three or more bedrooms. No updated Census or ACS data is available to describe the unit size by tenure. However, given housing market trends in the region, one can extrapolate that the majority of the large units in the City are still owner-occupied units, and a mismatch continues to exist between the number large renter-households and the supply of large rental units.

Table H-17 provides a breakdown of the incidence of housing problems among larger households by income and tenure between 2006 and 2008. Housing problems can be defined as cost burden (overpayment) greater than 30 percent of income, and/or overcrowding, and/or without complete kitchen or plumbing facilities. A greater percentage of large households (78 percent) had housing problems than all households (57 percent). Renter-occupied large households (as a group) tend to have more housing problems than owner-occupied large households. The vast majority of renter-occupied large households (84 percent) had one or more housing problems, while just over one-half of owner-occupied households (56 percent) had one or more housing problems.

Household by Type, Income, & Housing Problem	Renters		Owners		Total Households
	Large Related (5 or more members)	Total Renters	Large Related (5 or more members)	Total Owners	
Household Income <=30% AMI	125	1,130	20	250	1,380
With any housing problems	125	975	20	95	1,070
Household Income >30 to <=50% AMI	220	1,255	10	305	1,560
With any housing problems	220	1,240	10	120	1,360
Household Income >50 to <=80% AMI	160	1,675	40	515	2,190
With any housing problems	130	1,170	20	230	1,400
Household Income >80% AMI	205	1,945	125	1,650	3,595
With any housing problems	120	430	60	685	1,115
Total Households	710	6,005	195	2,720	8,725
With any housing problems	595	3,815	110	1,130	4,945

*Note: Totals may not match other Census 2000 products due to rounding.
Any housing problems: cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.
Source: CHAS (2006-2008).*

Resources

Lower and moderate income large households can benefit from many of the same programs that benefit other special needs households. Housing Choice Vouchers and affordable housing in the community can assist this group to attain decent and adequate housing.

In addition, the City retained the services of a consultant to review its development standards along the City's commercial corridors. To promote redevelopment, the study recommends providing density and height incentives to mixed use projects that include large units (with three or more bedrooms). The City intends to adopt the recommendations of the study.

2.4.4 Single-Parent Households

Single-parent households, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and 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.

The 2000 Census documented 2,254 family households with children under 18 years of age in the City of Imperial Beach. Of these households, 1,518 households (67 percent) were headed by a single parent. In 2000, 931 family households (14 percent) in Imperial Beach were below the poverty level. Approximately, 51 percent (477 households) of the family households below poverty level were headed by a female. Of the female-headed households below poverty level, 93 percent (444 households) had children under 18 years of age.

As of 2010, an estimated 15 percent of Imperial Beach households were headed by single parents (Table H-18); the large majority of which were headed by females (71 percent). The 2006-2010 ACS reports that 35 percent of female-headed families with children had incomes below the poverty level.

	Total HHs	Single-Parent HHs	Percent Total HHs	Female-Headed HHs with Children	Percent Single-Parent HHs
Imperial Beach	9,112	1,329	14.6%	946	71.2%
San Diego Region	1,086,865	94,380	8.7%	68,123	72.2%

HHs = Households
Source: Bureau of the Census (2010).

Resources

Lower-income single-parent households can benefit from City programs that provide direct rental assistance or that will facilitate the development of affordable housing.

2.4.5 Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal (migrant) agricultural labor. Due to the high cost of housing and low wages, a significant 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 between \$19,000 and \$30,000 annually.³ This limited income is exacerbated by their tenuous and/or seasonal employment status. It is estimated that there are between 100 and 150 farm worker camps located throughout the San Diego region, primarily in rural areas. These encampments range in size from a few people to a few hundred and are frequently found in fields, hillsides, canyons, ravines, and riverbeds, often on the edge of their employer's property. Some workers reside in severely overcrowded dwellings, in packing buildings, or in storage sheds.

³ State Employment Development Department, *Occupational Employment (May 2009) and Wage Data (1st Quarter, 2010)*.

According to the 2006-2010 ACS, 165 persons in the City of Imperial Beach were employed in the agriculture, forestry, fishing, hunting, and mining industry. It is assumed that the majority of these persons are employed in the fishing industry.

Resources

Because no land within Imperial Beach is designated for agricultural use and the City's farmworker population is small, the housing needs of this group are addressed through its standard affordable housing strategies.

2.4.6 Homeless

Factors contributing to the rise in homelessness include high rates of unemployment and underemployment, a lack of housing affordable to low and moderate income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the de-institutionalization of the mentally ill. Homelessness has long been an issue in San Diego County, reflecting high costs of housing in the region. Along with cuts in public funding and the long-lasting economic recessions, local communities are increasingly strained in their limited resources to provide assistance to the homeless.

Section 65583(a)(7) mandates that municipalities address the special needs of homeless persons within their jurisdictional boundaries. "Homelessness" as defined by the U.S. Department of Housing and Urban Development (HUD), describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
 - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include persons living in substandard housing (unless it has been officially condemned); persons living in overcrowded housing (for example, doubled up with others), persons being 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 Regional Task Force on the Homeless (RTFH) is San Diego County's leading resource for information on issues of homelessness. RTFH promotes a regional approach as the best solution to ending homelessness in San Diego County. According to RTFH, the San Diego region's homeless population can be divided into two general groups: (1) urban homeless, and (2) rural homeless, including farm workers and day laborers who primarily occupy the hillsides, canyons and fields of the northern regions of the county. It is important to recognize that homeless individuals may fall into more than one category (for example, a homeless individual may be a veteran and a substance abuser), making it difficult to accurately quantify and categorize the homeless.

RTFH compiles data from a physical Point-In-Time (PIT) count of sheltered (emergency and transitional) and street homeless persons. At the writing of this Housing Element, the most recent count took place on January 28, 2011 and the results are shown in Table H-19. Chula Vista and El Cajon had the largest homeless populations of the Southern and Eastern County cities, while the City of Imperial Beach is estimated to have 28 homeless persons.

Jurisdiction	Total
Chula Vista	441
Coronado	31
El Cajon	342
Imperial Beach	28
La Mesa	55
Lemon Grove	94
National City	140
Santee	58
San Diego Region	9,020
<i>Source: Regional Housing Task Force on the Homeless (2011).</i>	

Resources

While there are no homeless shelters in Imperial Beach, South Bay Community Services operates four facilities for the general homeless and victims of domestic violence (total 139 beds) in Chula Vista, accessible to Imperial Beach residents. In August 2012, the City amended the Zoning Ordinance to address the provisions of the C/MU zones. As part of that effort, emergency shelter is identified as a permitted use in the C/MU1 zone.

2.5 Housing Stock Characteristics

The characteristics of the housing stock, including growth, type, age and condition, tenure, vacancy rates, housing costs, and affordability are important in determining the housing needs for the community. This section details the housing stock characteristics of Imperial Beach to identify how well the current housing stock meets the needs of current and future residents of the City.

2.5.1 Housing Growth

Consistent with an urbanized, largely built-out community, Imperial Beach has experienced relatively little housing growth since 1990. The housing stock in the City grew from 9,525 units in 1990 to 9,882 units in 2010, or a four-percent increase over 20 years (Table H-20). Similarly limited housing growth occurred in El Cajon and Lemon Grove during this period with modest growth in La Mesa, National City, San Diego (City), and Santee. Housing growth in neighboring Chula Vista significantly outpaced regional growth over the past 20 years (59 percent vs. 23 percent). Chula Vista’s explosive housing growth can be explained by the completion of several large master planned communities. Imperial Beach, like other cities with limited or modest housing growth since 1990, has little remaining vacant land for large-scale development.

Jurisdiction	1990	2000	2010	Percent Change	
				1990-2000	2000-2010
Chula Vista	49,849	59,495	79,416	19.4%	33.5%
Coronado	9,145	9,522	9,634	4.1%	1.2%
El Cajon	34,453	35,190	35,850	2.1%	1.9%
Imperial Beach	9,525	9,739	9,882	2.2%	1.5%
La Mesa	24,154	24,943	26,167	3.3%	4.9%
Lemon Grove	8,638	8,722	8,868	1.0%	1.7%
National City	15,243	15,422	16,762	1.2%	8.7%
San Diego City	431,722	469,689	516,033	8.8%	9.9%
Santee	18,275	18,833	20,048	3.1%	6.5%
San Diego Region	946,240	1,040,149	1,164,786	9.9%	12.0%

Source: Bureau of the Census (1990-2010).

2.5.2 Projected Housing Units

Table H-21 shows that SANDAG expects the housing stock in Imperial Beach to remain largely unchanged between 2010 and 2020. Region-wide, however, the housing stock is expected to increase by approximately eight percent. Between 2010 and 2030, the Imperial Beach housing stock is forecast to experience an increase of six percent and approximately 22 percent more units could be added in the region. South County cities are expected to have slower rates of housing growth compared to the region between 2010 and 2030.

Jurisdiction	2010	2020	2030	Percent Change	
				2010-2020	2010-2030
Chula Vista	79,416	88,185	94,858	11.0%	19.4%
El Cajon	35,850	39,186	45,123	9.3%	25.9%
Imperial Beach	9,882	9,866	10,510	-0.2%	6.4%
La Mesa	26,167	26,785	28,104	2.4%	7.4%
Lemon Grove	8,868	9,075	9,381	2.3%	5.8%
National City	16,762	17,117	18,804	2.1%	12.2%
San Diego City	516,033	577,557	629,475	11.9%	22.0%
Santee	20,048	22,306	23,798	11.3%	18.7%
San Diego Region	1,164,786	1,262,488	1,417,520	8.4%	21.7%

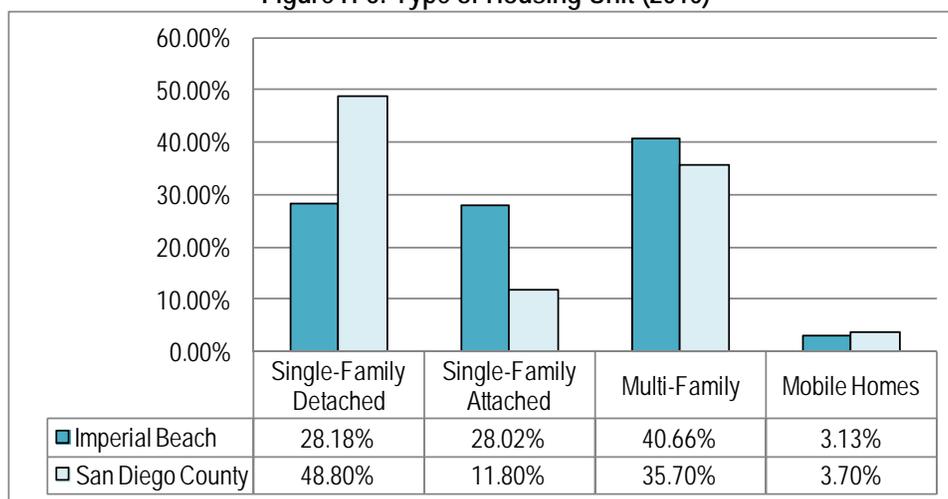
Sources: Bureau of the Census (2010) and SANDAG Regionwide Forecast (2050).

2.5.3 Housing Type

Imperial Beach maintains a diverse housing stock. Figure H-6 shows that in 2010, nearly 69 percent of units in the City were attached units (such as duplexes, triplexes, apartments, and townhomes). Detached single-family homes accounted for only 28 percent of housing units. By comparison, nearly half (49 percent) of the region's housing stock consisted of detached single-family dwellings. Attached housing products are generally cheaper per unit to construct and often represent more affordable housing options when compared to detached single-family

dwellings. Table H-22 shows that SANDAG estimates the composition of Imperial Beach's housing stock will remain largely unchanged through 2030.

Figure H-6: Type of Housing Unit (2010)



Source: SANDAG Regionwide Forecast (2030).

Housing Type	2010 (Estimates)	% of Total	2020 (Projected)	% of Total	2030 (Projected)	% of Total
Single-Family	5,542	56.2%	5,606	56.8%	6,030	57.4%
Multi-Family	4,009	40.7%	3,951	40.0%	4,184	39.8%
Mobile Homes	309	3.1%	309	3.1%	290	2.8%
Total Housing	9,860	100.0%	9,866	100.0%	10,504	100.0%

Source: SANDAG Regionwide Forecast (2050).

2.5.4 Housing Availability and Tenure

Tenure Distribution

Housing tenure and vacancy rates are important indicators of the supply and cost of housing. Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. In most communities, tenure distribution generally correlates with household income, composition and age of the householder.

In 2000, among the City's occupied housing units, approximately 30 percent were owner-occupied, while 70 percent were renter-occupied (Table H-23). The homeownership rate for the City has remained relatively steady over the past decade as little new construction had occurred. According to the 2010 Census, the tenure distribution in the City remained essentially the same.

Tenure	2000		2010	
	Number	Percent	Number	Percent
Owner Occupied	2,782	30.0%	2,756	30.2%
Renter Occupied	6,490	70.0%	6,356	69.8%
Total	9,272	100.0%	9,112	100.0%

Sources: Bureau of the Census (2000-2010).

Table H-24 shows the average household size by tenure. In both 2000 and 2010, the average household size for renter-occupied households was slightly higher than that for owner-occupied households, with the average household size for owner-occupied households actually trending downward.

Tenure	Average Household Size	
	2000	2010
Owner	2.79	2.71
Renter	2.86	2.87
Total	2.84	2.82

Sources: Bureau of the Census (2000-2010).

Vacancy Rate by Tenure

Vacancy rates are an important housing indicator because they indicate the degree of choice available. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low of a vacancy rate can force prices up, making it more difficult for low and moderate income households to find housing. Vacancy rates between two to three percent are usually considered healthy for single-family housing; and five to six percent for multi-family housing.

According to the 2010 Census, the overall vacancy rate in Imperial Beach was 7.8 percent, including units vacant for seasonal or occasional use, rented and sold units that were vacant at the time of the Census, and other unclassified vacant units. The vacancy rate for units available for sale or rent was 2.3 percent and 5.4 percent, respectively.

Additional vacancy information was obtained for fall 2011 from the San Diego County Apartment Association (SDCAA) and is shown in Table H-25. Vacancy rates in Imperial Beach were similar to those in neighboring communities and the County of San Diego.

Jurisdiction	All Properties			Over 25 Years		
	% Vacant	Total Units	# Vacant	% Vacant	Total Units	# Vacant
Chula Vista	5.2%	1,767	91	5.1%	1,462	75
Coronado	0.0%	29	0	0.0%	17	0
El Cajon	4.8%	1,890	90	4.2%	1,181	49
Imperial Beach	5.7%	174	10	5.8%	172	10
La Mesa	4.9%	975	48	5.7%	725	41
Lemon Grove	6.9%	173	12	7.6%	158	12
National City	1.8%	55	1	1.8%	55	1
Santee	4.3%	443	19	5.2%	115	6
East County San Diego	4.8%	3,904	188	4.6%	2,413	110
San Diego County	4.3%	19,915	860	--	--	--

Source: San Diego County Apartment Association Survey (Fall 2011).

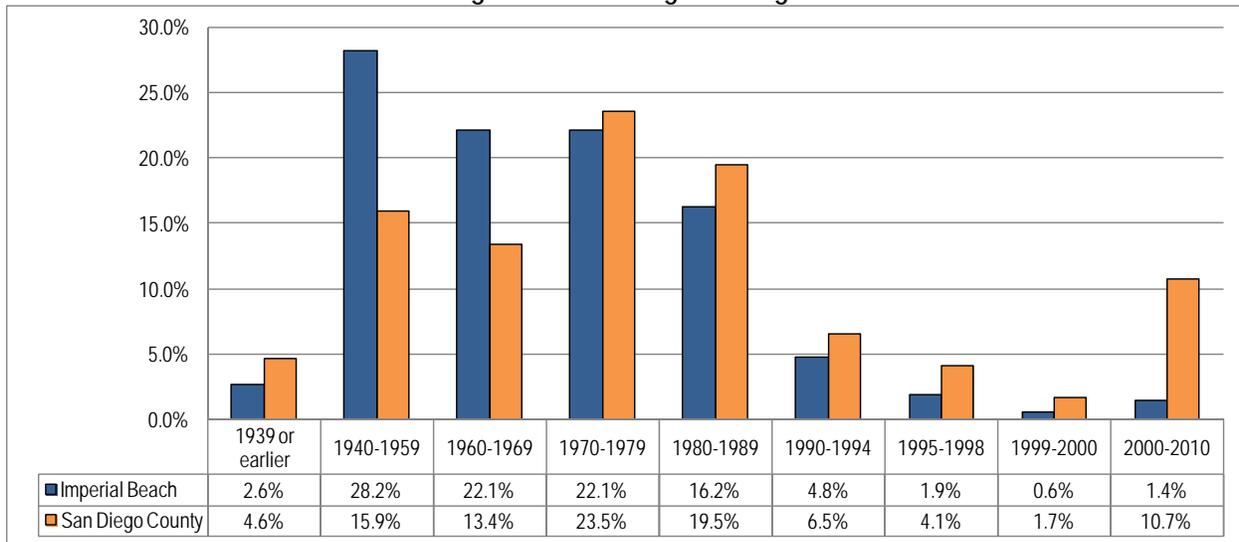
2.5.5 Housing Age and Condition

Housing age can be an important indicator of housing condition within a community. 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.

Imperial Beach's housing stock is significantly older than the County's housing stock (Figure H-7); about 75 percent of the City's housing stock was constructed over 30 years ago, while only 57 percent of the County's housing stock is of this age.

In June 2005, a windshield survey of Imperial Beach was conducted to identify the general housing conditions. The condition of housing was assessed by an exterior survey of quality, condition and improvement needed. Each residential structure was scored according to structural criteria established by the State Department of Housing and Community Development (HCD). There are five structural categories: foundation; roofing; siding; windows; and electrical. Based on scores assigned to the five categories, each housing structure was rated as being in sound or dilapidated condition, or in need of minor, moderate, or substantial repairs. The condition of each housing unit type is summarized in Table H-26. The majority of housing units (67 percent) were found to be in sound condition, though 33 percent are considered to need some form of rehabilitation.

Figure H-7: Housing Stock Age



Sources: Bureau of the Census (2000-2010).

Condition	Single Family	Multi Family	Total
Sound	63.7%	72.0%	66.7%
Minor	24.9%	20.0%	23.1%
Moderate	10.9%	7.7%	9.8%
Substantial	0.5%	0.3%	0.4%
Dilapidated	0.0%	0.0%	0.0%

Source: City of Imperial Beach (June 2005).

2.5.6 Housing Cost and Affordability

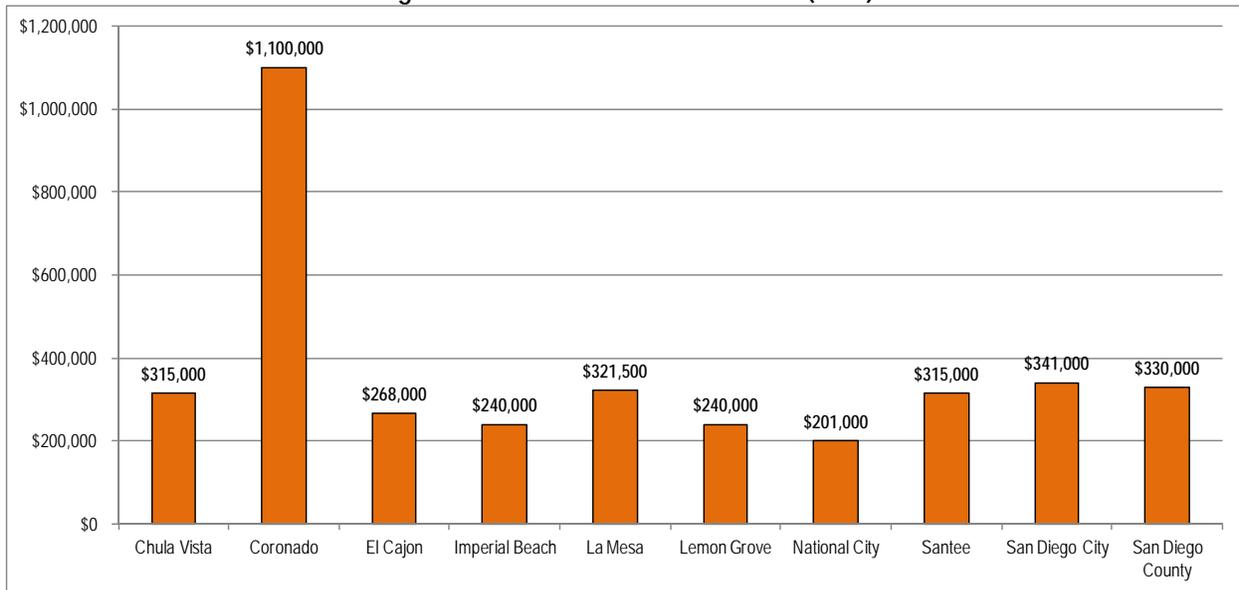
Housing costs can indicate whether housing is accessible to all economic segments of the community. This section summarizes the cost and affordability of the housing stock to Imperial Beach residents.

Home Ownership Market

Median home prices in the South and East County areas of San Diego ranged from \$201,000 in National City to \$341,000 in the City of San Diego (Figure H-8). Imperial Beach’s median home price fell on the lower end of the spectrum at \$240,000, substantially lower than the San Diego County median price of \$330,000.

Median home sale prices in Imperial Beach fell slightly by 0.6 percent between 2009 and 2010 (Table 29). Other southern and eastern San Diego cities, however, saw increases in their median home prices during this time period.

Figure H-8: Median Home Sales Price (2010)



Source: DQNews (2011).

Table H-27: Changes in Median Home Sale Prices

Jurisdiction	2009	2010		Percent Change in Median Sale Price
	Price	Number Sold	Price	
Chula Vista	\$302,000	3,461	\$315,000	+4.3%
Coronado	\$1,090,000	248	\$1,100,000	+0.9%
El Cajon	\$245,000	1,575	\$268,000	+9.4%
Imperial Beach	\$241,500	202	\$240,000	-0.6%
La Mesa	\$322,000	725	\$321,500	-0.2%
Lemon Grove	\$220,000	277	\$240,000	+9.1%
National City	\$180,000	391	\$201,000	+11.7%
Santee	\$297,950	752	\$315,000	+6.0%
San Diego City	\$320,000	14,497	\$341,000	+6.6%
San Diego County	\$310,000	36,414	\$330,000	+6.5%

Source: DQNews (2011).

Rental Market

The primary source of information on rental costs in the San Diego region is the San Diego County Apartment Association (SDCAA). SDCAA conducts survey of rental properties periodically. Table H-28 shows that in the fall of 2011, average monthly rents in Imperial Beach ranged from \$613 for a studio apartment to \$1,230 for a three-bedroom apartment. Apartment rents in Imperial Beach tended to be slightly lower than rents in other South and East County cities as well as the City and County of San Diego.

Table H-28: Average Monthly Rent (2011)						
Zip Code	Unit Type	Fall 2011 Units/Properties Surveyed	Fall 2011 Monthly Rent	Fall 2011 Rent/Sq. Foot	Spring 2011 Monthly Rent	Fall 2010 Monthly Rent
Chula Vista	Studio	6/4	\$661	\$1.28	\$710	\$671
	1 BR	604/24	\$892	\$1.37	\$950	\$1,023
	2 BR	1052/31	\$1,222	\$1.38	\$1,251	\$1,355
	3+ BR	105/12	\$1,563	\$1.17	\$1,543	\$1,815
Coronado	Studio	0/0	--	--	\$769	\$988
	1 BR	8/4	\$1,288	\$1.79	\$991	\$1,071
	2 BR	19/3	\$1,647	\$1.68	\$1,378	\$1,358
	3+ BR	0/0	--	--	\$2,300	\$2,250
El Cajon	Studio	40/4	\$729	\$1.68	\$665	\$719
	1 BR	871/20	\$857	\$1.31	\$877	\$1,215
	2 BR	879/36	\$1,095	\$1.48	\$1,010	\$1,522
	3+ BR	100/20	\$1,394	\$1.28	\$1,403	\$1,890
Imperial Beach	Studio	3/2	\$613	\$1.97	\$695	\$567
	1 BR	43/7	\$820	\$1.53	\$814	\$794
	2 BR	122/11	\$1,088	\$1.33	\$1,043	\$1,043
	3+ BR	6/2	\$1,230	\$1.22	\$1,345	\$1,297
La Mesa	Studio	5/4	\$872	\$1.49	\$796	\$791
	1 BR	487/14	\$1,097	\$1.56	\$974	\$1,000
	2 BR	459/19	\$1,437	\$1.50	\$1,229	\$1,249
	3+ BR	24/9	\$1,739	\$1.49	\$1,307	\$1,502
Lemon Grove	Studio	5/2	\$731	\$1.70	\$850	--
	1 BR	114/6	\$770	\$1.51	\$794	\$889
	2 BR	52/9	\$1,045	\$1.26	\$975	\$1,149
	3+ BR	2/1	\$1,500	\$1.30	\$1,362	\$1,500
National City	Studio	0/0	--	--	\$650	\$510
	1 BR	39/1	\$790	\$1.22	\$813	\$760
	2 BR	13/2	\$921	\$1.23	\$988	\$949
	3+ BR	2/2	\$1,375	\$0.98	\$1,375	\$1,260
Santee	Studio	0/0	--	--	--	--
	1 BR	164/3	\$988	\$1.46	\$975	\$994
	2 BR	263/9	\$1,205	\$1.37	\$1,287	\$1,275
	3+ BR	16/16	\$1,153	\$0.94	\$1,634	\$1,413
City of San Diego	Studio	489/50	\$923	\$2.11	--	--
	1 BR	3,170/190	\$1,211	\$1.85	--	--
	2 BR	4,317/283	\$1,575	\$1.66	--	--
	3+ BR	569/146	\$1,877	\$1.50	--	--
County of San Diego (including City of San Diego)	Studio	747/86	\$899	\$2.02	--	--
	1 BR	7,247/342	\$1,090	\$1.66	--	--
	2 BR	10,654/533	\$1,418	\$1.54	--	--
	3+ BR	1,267/268	\$1,730	\$1.40	--	--

Source: San Diego County Apartment Association Survey (Fall 2011).

Housing Affordability by Income Level

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. Taken together, 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.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, the California Department of Housing and Community Development (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.

The maximum affordable home and rental prices for residents in San Diego County are shown in Table H-29. This amount can be compared to current housing asking prices (Table H-27) and market rental rates (Table H-28) to determine what types of housing opportunities a household can afford.

Extremely Low Income Households

Extremely low income households earn 30 percent or less of the County AMI – up to \$16,900 for a one-person household and up to \$26,050 for a five-person household in 2012. Extremely low income households cannot afford market-rate rental or ownership housing in Imperial Beach without assuming a cost burden.

Very Low Income Households

Very low income households earn between 31 percent and 50 percent of the County AMI – up to \$28,150 for a one-person household and up to \$43,400 for a five-person household in 2012. A very low income household can generally afford homes offered at prices between \$86,500 and \$116,000, adjusting for household size. Given the costs of ownership housing in Imperial Beach, very low income households would not be able to afford a home in the City. Very low income renters will also find it difficult to find affordable appropriately-sized market-rate rental units in Imperial Beach.

Low Income Households

Low income households earn between 51 percent and 80 percent of the County AMI - up to \$45,000 for a one-person household and up to \$69,400 for a five-person household in 2012. The affordable home price for a low income household at the maximum income limit ranges from \$152,500 to \$217,000. Based on the sale prices in 2011 (Table H-27), ownership housing would not be affordable to low income households. After deductions for utilities, a one-person low income household could afford to pay up to \$1,085 in rent per month and a five-person low income household could afford to pay as much as \$1,641. Most low income households in Imperial Beach would be able to find adequately sized affordable apartment units (Table H-28), although the availability of such units may be limited.

Moderate Income Households

Moderate income households earn between 81 percent and 120 percent of the County AMI – up to \$98,400 depending on household size in 2012. The maximum affordable home price for a moderate income household is \$267,500 for a one-person household and \$395,000 for a five-person family. Moderate income households in Imperial Beach should be able to afford adequately-sized homes. The maximum affordable rent payment for moderate income

households is between \$1,554 and \$2,366 per month. Appropriately-sized market-rate rental housing is generally affordable to households in this income group.

Table H-29: Affordable Housing Costs (2012)								
Annual Income		Affordable Housing Cost		Utilities, Taxes and Insurance			Affordable Price	
		Rent	Purchase	Rent	Own	Taxes/ Insurance	Sale	Rent
<i>Extremely Low Income (30% of AMI)</i>								
1-Person	\$16,900	\$423	\$423	\$40	\$121	\$85	\$42,465	\$383
2-Person	\$19,300	\$483	\$483	\$52	\$155	\$97	\$45,205	\$431
3-Person	\$21,700	\$543	\$543	\$64	\$190	\$109	\$47,749	\$479
4-Person	\$24,100	\$603	\$603	\$76	\$225	\$121	\$50,293	\$527
5-Person	\$26,050	\$651	\$651	\$94	\$277	\$130	\$47,749	\$557
<i>Very Low Income (50% of AMI)</i>								
1-Person	\$28,150	\$704	\$704	\$40	\$121	\$141	\$86,495	\$664
2-Person	\$32,150	\$804	\$804	\$52	\$155	\$161	\$95,497	\$752
3-Person	\$36,150	\$904	\$904	\$64	\$190	\$181	\$104,303	\$840
4-Person	\$40,150	\$1,004	\$1,004	\$76	\$225	\$201	\$113,109	\$928
5-Person	\$43,400	\$1,085	\$1,085	\$94	\$277	\$217	\$115,653	\$991
<i>Low Income (80% of AMI)</i>								
1-Person	\$45,000	\$1,125	\$1,125	\$40	\$121	\$225	\$152,443	\$1,085
2-Person	\$51,400	\$1,285	\$1,285	\$52	\$155	\$257	\$170,838	\$1,233
3-Person	\$57,850	\$1,446	\$1,446	\$64	\$190	\$289	\$189,233	\$1,382
4-Person	\$64,250	\$1,606	\$1,606	\$76	\$225	\$321	\$207,432	\$1,530
5-Person	\$69,400	\$1,735	\$1,735	\$94	\$277	\$347	\$217,413	\$1,641
<i>Moderate Income (120% of AMI)</i>								
1-Person	\$63,750	\$1,594	\$1,859	\$40	\$121	\$372	\$267,412	\$1,554
2-Person	\$72,900	\$1,823	\$2,126	\$52	\$155	\$425	\$302,538	\$1,771
3-Person	\$82,000	\$2,050	\$2,392	\$64	\$190	\$478	\$337,241	\$1,986
4-Person	\$91,100	\$2,278	\$2,657	\$76	\$225	\$531	\$371,943	\$2,202
5-Person	\$98,400	\$2,460	\$2,870	\$94	\$277	\$574	\$395,100	\$2,366
<i>Source: California Department of Housing and Community Development, 2012 Income limits; and Veronica Tam and Associates Assumptions: 2012 HCD income limits; 30% gross household income as affordable housing cost; 20% of monthly affordable cost for taxes and insurance; 10% downpayment; and 5.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on San Diego County Utility Allowance (2011).</i>								

2.6 Affordable Housing

State law requires that the City address the preservation of multi-family rental units that are eligible to convert to market-rate housing due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during the next ten years. Thus, this at-risk housing analysis covers the period from January 1, 2013 through December 31, 2022.

2.6.1 Publicly Assisted Housing

The City of Imperial Beach has a number of publicly assisted rental housing affordable to lower and moderate income households. Table H-30 provides a summary listing of affordable

projects in the City. Overall, five projects (totaling 159 rental housing units) in the City include 157 affordable units. Specifically, 128 units are set aside as housing for lower and moderate income households.

Project Name	Total Units	Assisted Units	Funding Source	Earliest Date of Conversion	# of Units at Risk
Casa Estable I (1360 Hemlock Ave.)	7	7	County and City funds	Perpetuity	7
Casa Estable II (1260 Calla Ave.)	8	8	County and City funds	2051	8
Beachwind Apartments (624 12th Street)	15	14	Redevelopment Set-Aside funds	2063	14
St. James Plaza	99	99	HUD Section 202/Section 8	2014	99
American Legion Post	30	29	Density Bonus	2040	29
Total	159	157			157

Source: City of Imperial Beach (2011).

2.6.2 Preservation of At-Risk Housing

Within the 2013-2022 “at-risk” housing analysis period, one project (St. James Plaza) is considered at risk of converting to market-rate housing. This project offers 99 affordable housing units to lower income senior households. The California Housing Partnership Corporation lists the St. James Plaza Apartments as a complex in Imperial Beach that “may” be at risk for conversion to market-rate housing due to expiration of its project-based Section 8 assistance. This project is considered at low risk of conversion because the owners have opted to renew their HUD contract annually. While the HUD renewal process is annual, the approval is fairly automatic. If the property owner were to decide to allow the HUD program to lapse, the tenants would be notified and would have one year to relocate. While it is not likely, it is possible that St. James Plaza could convert to market rate at some point in the planning period.

Preservation and Replacement Options

To maintain the existing affordable housing stock, the City works to preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to non-profit ownership; 2) provision of rental assistance to tenants using other funding sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units. The following discussion highlights ways that the City’s at-risk project could be preserved as affordable housing. All of the presented alternatives are costly, probably beyond the ability of the City of Imperial Beach to manage without large amounts of subsidy from federal, State and other local resources. These options are described below.

Transfer of Ownership

St. James Plaza is a Section 202 senior housing project that also maintains a project-based Section 8 contract for rental subsidies. Section 202 projects are nonprofit-owned projects and therefore, transferring ownership of this project to another nonprofit organization is not an effective strategy for preserving the project.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. If funding permits, similar to Section 8 assistance, the City could provide rent subsidies to tenants of at-risk units. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low income household. Table H-31 estimates the rent subsidies required to preserve the affordability of the 99 at-risk units. Based on the estimates and assumptions shown in this table, approximately \$444,312 in rent subsidies would be required annually.

Table H-31: Rental Subsidies Required							
Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Affordable Cost (Minus Utilities)	Monthly per Unit Subsidy	Total Monthly Subsidy
<i>Very Low Income (50% AMI)</i>							
1-BR	99	\$1,126	2	\$32,150	\$752	\$374	\$37,025
<i>Notes:</i> 1. Fair Market Rents (FMR) FY 2012 are determined by HUD. 2. San Diego County 2012 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD). 3. Affordable cost = 30% of household income minus utility allowance.							

Purchase of Affordability Covenants:

Another option to preserve the affordability of the at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of this option depends on whether the complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City could ensure that some or all of the units remain affordable.

Construction of Replacement Units

The construction of new low income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e. square footage and number of bedrooms), location, land costs, and type of construction.

The American Legion project, which consists of 29 affordable units, was recently approved in the City in 2011. Development costs for this project totaled approximately \$324,523 per unit. This cost estimate includes land, construction, permits, on- and off-site improvements, and other costs. Assuming an average development cost of \$325,000 per unit for multi-family rental housing, replacement of the 99 at-risk units would require approximately \$32,175,000.

Cost Comparisons

The above analysis attempts to compare the magnitude of costs associated with various preservation and replacement options. Over the short term, providing rent subsidies would be least costly but this option does not guarantee the long-term affordability of the units. The cost to build new housing to replace the 99 at-risk units is high, with an estimated total cost of nearly \$32,175,000, but this option can expand the City's permanent affordable housing stock.

2.6.3 Resources for Preservation

Preservation of at-risk housing requires not only financial resources but also administrative capacity of nonprofit organizations. These resources are discussed in detail later in this Housing Element in the “Housing Resources” section.

2.7 Coastal Zone Requirements

2.7.1 Requirements and Exemptions

California Government Code Section 65588(c) requires each periodic revision of the Housing Element to include the following information relating to housing in the Coastal Zone:

- The number of new housing units approved for construction within the coastal zone since January 1, 1982;
- The number of housing units for persons and families of low or moderate income required to be provided in new housing developments either within the coastal zone or within three miles of the coastal zone as a replacement for the conversion or demolition of existing coastal units occupied by low or moderate income persons;
- The number of existing residential units occupied by persons and families of low or moderate income that have been authorized to be demolished or converted since January 1, 1982 in the coastal zone; and
- The number of residential units for persons and families of low or moderate income that have been required for replacement units.

The coastal replacement housing requirements do not apply to the following:

- The conversion or demolition of a residential structure which contains less than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units.
- The conversion or demolition of a residential structure for purposes of a nonresidential use which is either "coastal dependent" or "coastal related", such as visitor-serving commercial or recreational facilities, coastal-dependent industry, or boating or harbor facilities.
- The conversion or demolition of a residential structure located within the jurisdiction of a local government which has within the area encompassing the coastal zone, and three miles inland therefrom, less than 50 acres, in aggregate, of land which is vacant, privately owned and available for residential use.
- The conversion or demolition of a residential structure located within the jurisdiction of a local government which has established a procedure under which an applicant for conversion or demolition will pay an in-lieu fee into a program, the various provisions of which, in aggregate, will result in the replacement of the number of dwelling units which would otherwise have been required.

2.7.2 Housing in Imperial Beach Coastal Zone

The City does not keep specific construction and demolition records for the Coastal Zone. However, approximately two-third of the City of Imperial Beach is in the Coastal Zone. Therefore, Coastal Zone activity is determined by calculating two-third of all activity in the City.

New Construction

Since 1982, 1,687 housing units have been added to the City's housing stock. Of these, an estimated 1,125 units were in the Coastal Zone.

Affordable Housing

Government Code Section 65590 (d) (also known as the Mello Act) states that "new housing developments constructed within the coastal zone shall, where feasible, provide housing units for persons and families of low and moderate income, as defined in Section 50093 of the Health and Safety Code. Where it is not feasible to provide these housing units in a proposed new housing development, the local government shall require the developer to provide such housing, if feasible to do so, at another location within the same city or county, either within the coastal zone or within three miles of."

Due to limited finances and the small scale of residential development in Imperial Beach, the City has not found that it is feasible to require the provision of housing units for low and moderate income households as part of new housing developments in the Coastal Zone. However, market rate prices in Imperial Beach have historically been affordable to many low and moderate income families. Furthermore, the 30-unit American Legion Post was approved by the City in 2011. The project includes 29 affordable units to very low income households.

Demolished/Converted Low and Moderate Income Housing

Between 1982 and 2011, 243 housing units were demolished in the City. Using the two-third ratio, the City estimated that 131 housing units were demolished in the Coastal Zone. However, the City did not track the affordability of these units as none of the demolitions consisted of three or more dwelling units, thereby excluded from the requirement for replacement units.

Replacement Housing

Construction in the City occurs primarily as recycling of older single-family units into new single-family homes or smaller multi-family complexes. Furthermore, the City is primarily built out and has less than 50 acres of land within the Coastal Zone that is vacant and designated for residential uses. Therefore, the City is not subject to the replacement requirement.

Section 3: Housing Constraints

Although the City of Imperial Beach strives to ensure the provision of adequate and affordable housing to meet the needs of the community, many factors can constrain the development, maintenance, and improvement of housing. These include market mechanisms, government regulations and policies, and infrastructure and environmental constraints. This section addresses these potential constraints that may affect the supply and cost of housing in Imperial Beach.

3.1 Market Constraints

Locally and regionally there are several constraints that hinder the City's ability to accommodate the community's affordable housing demand. The high cost of land, rising development costs, and neighborhood opposition make it expensive for developers to build affordable housing.

3.1.1 Development Costs

High development costs in the region stifle potential affordable housing developments. Construction costs for residential units have increased rapidly over the last two decades, particularly the cost of materials and land. The difficulty of developing small, infill sites can also constrain housing development in built out communities such as Imperial Beach.

Labor and Materials Cost

The costs of labor and materials have a direct impact on the price of housing and are the main components of housing cost. Residential construction costs vary greatly depending upon the quality, size, and the materials being used. A major component of the cost of housing is the cost of building materials, such as wood and wood-based products, cement, asphalt, roofing materials, and plastic pipe. Prices for these goods are affected primarily by the availability and demand for such materials. The costs of building materials in San Diego County in general and in Imperial Beach in particular are moderate and, therefore do not constitute a constraint to the development of affordable housing.

A major cost component of new housing is labor. The cost of labor in Imperial Beach is relatively low for a number of reasons. Overall, the San Diego region cost of living is relatively high; wage scales in the area, therefore, tend to be somewhat higher than in markets with lower living costs. Also labor is generally less costly because the area is predominantly non-union. Labor in highly unionized markets is typically more expensive.

Product design and consumer expectations also influence the types and styles of units being constructed in this area. Today's new homes are quite different than those produced during the 1960s. Numerous interior and exterior design features (larger master bedroom suites, microwave ovens, trash compactors, dishwashers, wet bars, decorative roofing materials, exterior trim, and architectural style) make it difficult to make direct comparisons in costs over the years. In a highly competitive market, many consumers consider these amenities as necessities when buying a new home. While the basic shelter house has met with varying degrees of consumer acceptance, the high costs of homeownership may lead to a return to less complicated designs. A significant constraint for many families is the specific design features (lack of recreational facilities or unit size and design) in individual projects that are not suited for

children. In addition, design features such as stairs, hallways, doorways, counters, and plumbing facilities may restrict access to disabled persons.

Reduction in amenities and the quality of building materials (above a minimum acceptability for health, safety, and adequate performance) could lower costs and associated sales prices or rents. In addition, prefabricated factory-built housing may provide for lower priced housing by reducing construction and labor costs. Another factor related to construction costs is the number of units built at one time. As the number of dwelling units in a project increases, overall cost per unit can decrease due to economies of scale.

Land Cost

The price of raw land and any necessary improvements is another key component of the total cost of housing. A diminishing supply of land available for residential construction boosts the cost of land. High land costs tend to incentivize home builders to develop higher-end homes and apartments in an effort to attract the greatest possible sale prices and lease rates. Developers also sometimes seek to maximize the largest number of units allowable on a given parcel. This allows the developer to distribute the costs for new infrastructure improvements (e.g. streets, sewer lines, water lines, etc.) over the maximum number of lots.

Few residential lots were listed for sale in Imperial Beach in 2011. The average cost for single-family lots was \$33 per square foot. The MLS listed only one small commercial lot that could accommodate mixed use or multi-family residential. The asking price for this small beach front lot exceeded \$300 per square foot.

A density bonus is available to developers who provide affordable housing as part of their projects. Developers of affordable housing may also be granted regulatory concessions or development incentives. Density bonuses, together with the incentives and/or concessions, result in a lower average cost of land per dwelling unit thereby making the provision of affordable housing more feasible.

3.1.2 Availability of Mortgage Financing

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 data for Imperial Beach were compiled by aggregating census tracts to approximate the City boundaries.

Mortgage and Home Improvement Lending

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. Overall, 648 households applied for mortgage loans for homes in Imperial Beach in 2010 (Table H-32). Of the applications for conventional purchase loans, 59 percent were approved and 22 percent were denied, and 19 percent were withdrawn or closed for incompleteness. The approval rate for government-backed home purchase loans was higher at 73 percent. More than half (55 percent) of refinance applications were approved. The denial rate was greatest for home improvement loans (47 percent). To supplement the market-rate lending, Imperial Beach households have access to homeownership and rehabilitation assistance offered by the County Housing and Community Development Department.

Loan Type	Total Applicants	Approved	Denied	Other
Government-Backed Purchase	89	73%	16%	11%
Conventional Purchase	117	59%	22%	19%
Refinance	425	54%	27%	19%
Home Improvement	17	53%	47%	0%
Total	648	58%	25%	17%

Notes:

1. "Appr. Not Accepted" are those applications approved by the lenders but not accepted by the applicants.
2. "Other" includes files closed for incompleteness, and applications withdrawn.

Source: www.lendinpatterns.com, Home Mortgage Disclosure Act (HMDA), 2010.

Foreclosures

Foreclosure occurs when households fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current. If payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowners must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

Between 2000 and 2005, with low interest rates, "creative" financing (e.g., zero down, interest only, adjustable loans), and predatory lending practices (e.g., aggressive marketing, hidden fees, negative amortization), many households purchased homes that were beyond their financial means. Under the false assumptions that refinancing to lower interest rates would always be an option and home prices would continue to rise at double-digit rates, many households were unprepared for the hikes in interest rates, expiration of short-term fixed rates, and decline in sales prices that set off in 2006. Suddenly faced with significantly inflated mortgage payments, and "upside-down" mortgage loans (that are larger than the worth of the homes), many had to resort to foreclosing their homes.

During the second quarter of 2011, a total of 4,504 Notices of Default (NODs) were recorded in San Diego County, a modest (3.5 percent) increase from the second quarter of 2010.⁴ However, according to Foreclosure-Response.org, which offers resources for preventing foreclosures and stabilizing communities, California is still impacted by serious mortgage delinquencies and unemployment. In March 2011, the San Diego metropolitan area was ranked 211th among 366 metropolitan areas in terms of overall foreclosure rates at 4.0 percent. Specifically, the prime foreclosure rate was 3.2 percent and subprime foreclosure rate was 15.5 percent. Furthermore, the San Diego metropolitan area was ranked 127th in serious mortgage delinquency rate at 8.6 percent (down from 10.2 percent in March 2010). Serious delinquency is defined as more than 90 days behind on mortgage payments.

In September 2011, 84 homes in Imperial Beach were listed as foreclosures for sale.⁵ These homes are listed at various stages of foreclosure (from pre-foreclosures to auctions) and range in price from \$79,000 for a small one bedroom to \$1,360,000 for a large beach front four

⁴ <http://www.foreclosureradar.com/california/san-diego-county-foreclosures>, accessed September 24, 2011.

⁵ http://realestate.yahoo.com/search/California/Imperial_Beach/foreclosures, accessed September 24, 2011.

bedroom. Approximately 25 percent of the homes in foreclosure were smaller units listed at \$200,000. Less than 10 percent of units in foreclosure were listed at prices exceeding \$400,000. The relative smaller sizes and lower prices of listed homes indicates that lower and moderate income households in Imperial Beach may be disproportionately impacted by the recent lending and foreclosure crisis.

3.2 Governmental Constraints

Actions or policies of governmental agencies, whether involved directly or indirectly in the housing market, can impact the ability of the development community to provide adequate housing to meet consumer demands. For example, the impact of federal monetary policies and the budgeting and funding policies of a variety of departments can either stimulate or depress various aspects of the housing industry. Local or State government compliance or the enactment of sanctions for noncompliance with the federal Clean Air and Water Pollution Control Acts can impact all types of development.

State agencies and local government compliance with State statutes can complicate the development of housing. Statutes such as the California Environmental Quality Act (CEQA) and rezoning and General Plan amendment procedures required by the California Government Code can also act to prolong the review and approval of development proposals by local governments. In many instances, compliance with these mandates establishes time constraints that cannot be altered by local governments.

City policies can also impact the price and availability of housing in Imperial Beach. Land use controls, site improvement requirements, building codes, fees, and other local programs to improve the overall quality of housing may serve constraints to housing development. The following public policies can affect overall housing availability, adequacy, and affordability.

3.2.1 Land Use Controls

General Plan and Zoning

The Imperial Beach General Plan and Zoning Ordinance provide for a range of land use designations/zones in the City that can accommodate residential units. The City's distribution of land use by zoning is presented in Figure H-9. The following discussions describe the various zones that allow residential or mixed use development.

- **R-1-6000 Single Family Residential:** Provides for the development of low density detached single family dwelling units, including mobile homes. The 6,000 sq. ft. minimum lot size will allow a maximum density of seven units per net acre. Uses such as parks, libraries, churches, schools, and family day-care homes, which are determined to be compatible with and oriented toward serving the needs of low-density detached single-family dwellings, are also allowed.
- **R-1-3800 Single Family Residential:** Provides for the development of low density detached single family dwelling units, including mobile homes. The 3,800 sq. ft. minimum lot size will allow a maximum density of 11 units per net acre. Uses such as parks, libraries, churches, schools, and family day-care homes, which are determined to be compatible with and oriented toward serving the needs of low density detached single-family dwellings, are also allowed.

- **R-3000 Residential:** Provides for the development of detached and attached single-family dwellings, including mobile homes and duplexes. The minimum lot size is 6,000 sq. ft. with a maximum density of one unit per every 3,000 sq. ft. of land (or 14 units per net acre). Uses such as parks, libraries, churches, schools, family day-care homes, and other uses, which are determined to be compatible with and oriented toward serving the needs of the zone are also allowed. The intent of this designation is to provide for a moderately intense residential living environment in typically one and two-story units.
- **R-3000-D Residential:** The same as R-3000, except attached single-family units are not allowed.
- **R-2000 Residential:** Provides for the development of detached or attached single family and multi-family dwellings, including duplexes, apartments, condominiums, and townhomes. The minimum lot size is 6,000 sq. ft. with a maximum density of one unit per every 2,000 sq. ft. of land (or 21 units per net acre). Uses such as parks, libraries, churches, schools, family day-care homes, and other uses, which are determined to be compatible with and oriented toward serving the needs of the zone are also allowed by a conditional use permit (CUP). Within the R-2000 area between Seacoast Drive and 4th Street, an additional dwelling unit per lot may be authorized by a conditional use permit. The intent of this designation is to provide for a moderately intense residential living environment in typically one and two-story units.
- **R-1500 Residential:** Provides for the development of detached and attached single family and multi-family dwellings, including duplexes, apartments, condominiums, and townhomes. The minimum lot size is 3,000 sq. ft. with a maximum density of one unit per every 1,500 sq. ft. of land (or 29 units per net acre). Uses such as parks, libraries, churches, schools, family day-care homes, and other uses, which are determined to be compatible with and oriented toward serving the needs of the zone are also allowed. The intent of this designation is to provide for an intense residential living environment in typically two and three-story units.
- **C-1 General Commercial:** Provides for land to meet the local demand for commercial goods and services, as opposed to the goods and services required primarily by the tourist population. It is intended that the dominant type of commercial activity in this designation will be community and neighborhood serving retail and office uses such as markets, specialty stores, professional offices, personal service department stores, restaurants, liquor stores, hardware stores, etc. Mixed use development with residential uses above first commercial uses is also allowed with approval of a conditional use permit (CUP). The minimum lot size is 3,000 sq. ft. with a maximum residential density of one unit per every 1,000 sq. ft. of land (up to 43 units per net acre).
- **C-2 Seacoast Commercial:** Provides for land to meet the demand for goods and services required primarily by the tourist population, as well as local residents who use the beach area. It is intended that the dominant type of commercial activity in this designation will be visitor-serving retail such as specialty stores, surf shops, restaurants, hotels and motels, etc. In order to promote a more pedestrian-oriented community character, as well as to reduce the high volume of vehicle trips attracted by drive-thru establishments, drive-thru services for restaurants, banks, dry cleaners, and other similar auto related business establishments are prohibited in this designation. Mixed

use development with residential uses above first commercial uses is also allowed with approval of a CUP. The minimum lot size is 3,000 sq. ft. with a maximum residential density of one unit per every 1,500 sq. ft. of land (up to 29 units per net acre).

- **C-3 Neighborhood Commercial:** Provides for land to meet the local neighborhood demand for commercial goods and services, as opposed to the goods and services required primarily by the tourist population or city-wide. It is intended that the dominant type of commercial activity in this designation will be neighborhood serving retail and office uses such as markets, professional offices, personal services, restaurants, hardware stores, etc. In order to maintain and promote a more pedestrian-oriented community character, as well as to reduce the high volume of vehicle trips attracted by drive-thru establishments, drive-thru services for restaurants, banks, dry cleaners and other similar auto related business establishments are prohibited in this designation. Mixed use development with residential uses above first commercial uses is also allowed with approval of a CUP. The minimum lot size is 3,000 sq. ft. with a maximum residential density of one unit per every 2,000 sq. ft. of land (up to 21 units per net acre).
- **MU-1 Mixed Use Overlay:** The area generally located between Calla Avenue on the north, Donax Avenue on the south, Seventh Street on the east, and the eastern City boundary, is designated as a commercial-residential overlay area. In this overlay designation, general commercial activities are encouraged to expand into areas otherwise designated as R-1500 (plus a small area zoned R-2000), only if the lot proposed for commercial development is immediately adjacent to an existing commercial building used for commercial purposes, and only if the commercial use will occupy a newly constructed building designed solely for commercial or mixed use purposes. Approval of a CUP for commercial-only or mixed-use is required within this overlay.
- **MU-2 Mixed Use Overlay:** The area located between Ocean Boulevard on the west, Ocean Lane on the east and between Imperial Beach Boulevard on the south and Palm Avenue on the north is designated as a commercial-residential overlay zone. The purpose of this transition zone designation is to allow for the gradual commercial expansion in an area which is currently zoned R-1500 and used for residential purposes.
- **UR Urban Reserve:** Applies to land that is currently vacant or may be recycled to another use in the future (including residential use). An Urban Reserve area will develop pursuant to a Specific Plan which treats the property as an integrated whole for development planning purposes. The maximum density or intensity of development for this designation will be determined as part of the future Specific Plan. This is intended to prevent isolated or premature land uses from occurring on lands for which adequate public services and facilities are unavailable or for which the determination of the appropriate zoning regulations is precluded by contemplated or adopted planning proposals or by a lack of economic, demographic, geographic or other data.

Figure H-9: Imperial Beach Zoning Map



Actions to Mitigate Constraints

The City closely monitors the implementation of its General Plan and Zoning Ordinance. When constraints are identified, staff works to address those constraints. For example, in 2007 the City engaged the services of AECOM to review and recommend changes to the City's commercial development regulations to facilitate redevelopment along commercial corridors. The City implemented the consultant's recommendations by making the following Zoning District changes:

- The areas currently zoned C-1 or R-1500/MU-1 within the Palm Avenue study area will be rezoned as "C/MU-1: General Commercial and Mixed-Use."
- The areas currently zoned C-2 or R-1500/MU-2 within the Seacoast Drive and Old Palm Avenue study areas will be rezoned as "C/MU-2: Seacoast Commercial and Mixed-Use."
- The areas currently zoned C-3 within the 13th Street Corridor study area will be rezoned as "C/MU-3: Neighborhood Commercial and Mixed-Use."

Reclassifying these areas will accomplish the following:

- Bringing "Mixed-Use" into the base zone name will emphasize the City's desire for the area to redevelop with mixed-use character while not disallowing purely commercial development.
- Consolidating the commercial base zones with the mixed use overlay districts will simplify the Zoning Ordinance and encourages consistent development within the study areas.
- Consolidation will also allow for parcel assembly that may otherwise span both zones and result in ambiguity in permitted development character.

The Zoning Ordinance was amended on August 15, 2012.

3.2.2 Residential Development Standards

The City's Zoning Ordinance contains development standards for each zoning district consistent with the land use designations of the General Plan. The Imperial Beach Zoning Ordinance establishes development standards for each zone to ensure quality development in the community. Development criteria, as specified in the Zoning Ordinance, are presented in Table H-33. These development standards are typical and consistent with standards established in surrounding communities.

Development Standard	Zoning Designation							
	R-1-6000	R-1-3800	R-3000	R-2000	R-1500	C-1	C-2	C-3
Minimum Net Lot Area (sq. ft.)	6,000	3,800	6,000	6,000	3,000	3,000	3,000	3,000
Density Maximum (du/acre)	7	11	14	21	29	43	29	21
Minimum Lot Width (feet)	60	50	50	50	50	30	30	30
Maximum Lot Coverage (% of lot area)	--	--	--	50%	50%	--	--	--
Maximum Floor Area Ratio (FAR)	--	--	--	75%	100%	--	--	--
Minimum Setbacks (feet)								
Front	20	15	15	15	15	--	0-10*	--
Side	5	5	5	5	5	--	--	--
Rear	10 (5 w/ alley)	--	--	--				
Maximum Height (feet)	26	26	26	26	30	40	30	28
Open Space (sq. ft. per unit)	300	300	300	300	300	300	300	300
<i>Source: City of Imperial Beach, 2011.</i>								
<i>*Front yard setback on Seacoast Dr. within the C-2 as follows: Zero feet first floor; five feet second floor; ten feet third floor.</i>								

Conclusions

The cumulative effect of the City's residential development standards does not constrain the expansion of housing opportunities. Density standards of the Zoning Ordinance are consistent with the densities established for General Plan land use categories. Single-family detached housing is allowed at densities up to 14 units per net acre. Multi-family densities, including, but not limited to attached, zero lot line, and apartments, range from 14 to 29 dwelling units per acre. Residential uses located above first floor commercial uses may be approved at densities ranging between 21 and 43 units per net acre. The setback requirements are typical in the region that provide minimal light and air for development and do not unreasonably constrain housing opportunities. Minimum lot size requirements are reasonably small and reduce the number of potentially non-conforming lots that could occur with larger minimum lot size requirements.

Within Commercial zones, where a significant portion of residential growth is expected to occur during the current Housing Element planning period, the City has established increased height limits, reduced parking standards, and eliminated setback, lot coverage, and FAR standards to facilitate mixed use development.

The City monitors closely its development standards and their impact on development. Periodically, the City made amendments to its Zoning Ordinance to ensure development standards respond to market trends. For example, in 2007, the City reduced its parking requirements for additions to housing units. Also in 2007, the City engaged the services of AECOM to review and recommend changes to the City's commercial development regulations to facilitate redevelopment along commercial corridors. Smart growth-based economic development models indicate that a critical mass of residential units is required near commercial activities to make the commercial units viable. The City has found this to be case in practice as development of the commercial component of recent mixed use projects were driven and supported by the residential market demand. The City implemented the consultant's

recommendations. Specifically, the City made the following Zoning Ordinance changes to incentivize mixed use development:

- **Building Height:** As part of the C/MU-3 zone change, the City increased maximum height from two-stories or 28 feet to three stories and 30 feet or 35 feet for projects that qualify for performance-based bonus.
- **Density Bonus:** The City will update the Zoning Ordinance density bonus provisions to reflect current State Law. Developers of qualifying projects may receive various incentives, concessions, and potential waivers of development standards, including parking standards as necessary to ensure that the City’s development standards do not constrain the development of affordable housing.

In addition, projects that qualify for performance-based bonuses will be able to achieve 36 units per acre in the new C/MU-3 zone (currently 22 units per acre) and the new C/MU-2 zone (currently 22 units per acre). To qualify for height or density bonus incentives over-and-above those mandated by State law, a project must satisfy two or more of the performance-based standards summarized in Table H-34.

Lot Consolidation	Project sites that are consolidated to a final size greater than 20,000 square feet.
Green Building	Entire project achieves LEED certification, a comparable green building certification, or can demonstrate ability to achieve certification.
Active Commercial Use	Entire project must provide a minimum of 75 percent active commercial uses on the ground floor.
Three-Bedroom Units	25 percent of proposed residential units must be three-bedroom units.
Public Open Space, Plaza Space, or Public Community Amenities	Provide an additional 100 square feet of open space or plaza space with minimum dimensions of six feet by 10 feet.
Public Right-of-Way Dedication	Dedicate a minimum of one foot of private property frontage to public use (creates a one-foot front setback dedicated to public use).
Floor Stepback from Residential Property	Floors above first floor provide additional setback five feet beyond required stepback.
<i>Source: Commercial Zoning Review, City of Imperial Beach, 2010.</i>	

Small Lots

The City also recognizes that a prevalence of smaller sized lots in the residential base zone may impede mixed use and high density residential development. Section 19.42.070 of the Municipal Code discourages lot consolidation in residential base zones by limiting potential density to the maximum yield that would have occurred had the lots not been consolidated. This Housing Element includes a program to eliminate this lot combining restriction within residential base zones and establishes incentives to consolidate lots in commercial and mixed use zones. In addition, the City recognizes that many existing lots are smaller than the minimum lot size for many zoning districts. These lots are subject to small lot provisions of the Zoning Ordinance. Small lots that were legally established and recorded before 1945 are considered meeting the lot size requirement for the applicable zoning district.

3.2.3 Parking Requirements

All residential uses are currently required to provide the number of parking spaces as specified in Table H-35. Developers of affordable and senior housing who are eligible for a density bonus pursuant to Government Code Section 65919-65918 are eligible to use parking standards established by State law. For example, in October 2011, the City Council approved an affordable housing mixed-use project that provided parking in accordance with standards set forth in State law.

Table H-35: Parking Requirements for Residential Uses	
Use	Parking Requirement
Dwelling units in the R-1-6000, R-1-3800, and R-3000 zones	2 enclosed spaces per unit
Dwelling units in the R-2000 or R-1500 zones	2 spaces per unit, 50 percent enclosed
Dwelling units in the C-1, C-2, or C-3 zones	1.5 spaces per unit
Mobile home parks	1.5 spaces per space
Boarding houses and retirement homes	2 spaces plus one space for each three beds
<i>Source: City of Imperial Beach Zoning Ordinance, 2011.</i>	

The 2010 Commercial Zoning Review yielded recommendations to facilitate mixed use development and pedestrian-oriented activity within the City's commercial corridors. The City implemented the study recommendations. Specifically, the City modified the Zoning Ordinance to allow shared parking within 1,000 feet instead of the current 500 feet. The City also simplified its parking ratios for commercial uses. Instead of varying standards, the City requires one space per 500 square feet of commercial use proposed within the C/MU-1 and C/MU-3 zones and only one space per 1,000 square feet of commercial use proposed within the C/MU-2 zone. Furthermore, within the C/MU zones, vertical mixed-use projects will be eligible for a 25 percent reduction in overall parking requirement; parking requirements will be waived for commercial uses less than 1,000 square feet; and an additional reduction may be granted with approval of a shared parking plan. Existing reductions for affordable and senior housing provided by State law and the City's proposed modifications for mixed use development will facilitate the provision of a variety of housing types in Imperial Beach.

3.2.4 Provision for a Variety of Housing

State 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 various types of housing for all segments of the population, including multi-family residential housing, factory built housing, emergency shelters, transitional housing, and supportive housing. Table H-36 summarizes the housing types permitted and conditionally permitted under the Zoning Ordinance.

Uses	R-1-6000	R-1-3800	R-3000	R-2000	R-1500	C/MU-1	C/MU-2	C/MU-3
Single-Family	P	P	P/SPR	P/SPR	P/SPR	--	P ¹	--
Multi-Family	--	--	--	SPR	SPR	P ²	P ²	P ²
Manufactured Housing	P	P	--	--	--	--	--	--
Mobile Home Park	CUP	CUP	CUP	CUP	CUP	--	--	--
Emergency Shelter	--	--	--	--	--	P	--	--
Boarding House	--	--	--	--	--	C[P]	--	--
Residential Care Facility - 6 or fewer persons	P	P	P	P	P	CUP	CUP	CUP
Mixed Use	--	--	--	--	--	P	P	P
Live/Work Unit	--	--	--	--	--	P	P	P
Senior Housing	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP
Second Dwelling Units	--	--	P	P	P	--	--	--

P – Permitted by right; SPR - Site Plan Review; CUP – Conditional Use Permit required; -- Not permitted
Notes:
1. Only permitted in Seacoast Residential Overlay Zone.
2. Requirements for active commercial uses on ground floor.
Source: City of Imperial Beach Zoning Ordinance, 2012.

Single Family Housing

A “single-family dwelling” is defined in the Imperial Beach Zoning Ordinance as a lot containing one dwelling unit, not attached in any manner to another dwelling unit. All single-family projects proposed in the R-3000, R-2000, and R-1500 zones that contain two to four units require Site Plan Review approval by the Community Development Department and five or more units require Site Plan Approval by the Planning Commission.

Multifamily Housing

The Zoning Ordinance provides for multi-family developments in the R-2000 and R-1500 zones with allowable density ranging from 21 to 29 units per acre. Multi-family projects containing two to four units require Site Plan Review approval by the Community Development Department and five or more units require Site Plan Review approval by the Planning Commission.

Since 2000, approximately 150 multi-family rental units have converted to ownership condominiums. As the availability of land decreased and the cost of land increased in the last decade, many developers actively pursued the conversion of multi-family rental stock into condominium units. Condominium conversions had been one of the few ways within the City of Imperial Beach that had the potential of meeting the demand for first-time homebuyer housing. However, while it does address the demand for ownership homes, the conversion removed necessary rental housing targeting those households in the moderate incomes who may not have been able to afford the asking price for the converted units.

To address the issues surrounding the conversion of rental housing to condominiums, the City adopted a Condominium Conversion Ordinance in 2005. The ordinance identifies development standards for conversions and established relocation procedures and compensation for existing tenants who cannot afford to purchase the unit they are currently occupying.

Manufactured Housing/Mobile Homes

Manufactured housing and mobile homes offer an affordable housing option to many low and moderate income households. The California Department of Finance estimated that there were 340 mobile homes in the City as of January 2010. According to the National Manufactured Home Construction and Safety Act of 1974, a manufactured home built and certified after June 15, 1976, and constructed on a permanent foundation may be located in any residential zone where a conventional single-family detached dwelling is permitted subject to the same restrictions on density and to the same property development regulations. Manufactured homes are currently allowed in single-family residential zoning districts and mobile home parks are allowed with a CUP and subject to foundational regulations found in Government Code Section 65852.3. However, manufactured housing is not permitted in all zones that allow single-family dwelling units. Consistent with State law, the City will amend the Zoning Ordinance to permit manufactured housing installed on permanent foundation and meeting State and national standards where single-family homes are otherwise permitted.

Boarding Houses

Boarding houses are facilities in which food and/or shelter is provided to unrelated persons. Examples listed in the Zoning Ordinance include rest homes, sanitariums, convalescent homes, fraternity houses, sorority houses, group homes and other similar operations. Boarding houses are allowed with approval of a CUP in the C/MU-1 zones. However, group homes meeting the definitions and requirements in the Lanterman Developmental Disabilities Services Act are permitted as regular residential uses (see Residential Care Facilities below).

Residential Care Facilities

Residential care facilities can be described as any family home, group care facility or similar facility, including transitional housing, for 24-hour non-medical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living. In accordance with State law, Imperial Beach treats residential care facilities serving six or fewer persons as a normal residential use and these facilities are permitted by-right within all residential zones. Larger Residential Care Facilities (those that serve seven or more persons) are considered Boarding Houses and are allowed in the C/MU-1 zones with approval of a CUP. The City has no distance requirement for residential care facilities.

Mixed Use

Mixed use projects combine both non-residential and residential uses on the same site. Mixed use development can help reduce the effects of housing cost burden by increasing density and offering opportunities for reduced vehicular trips by walking, bicycling or taking public transportation. Mixed use development is allowed by right in the new C/MU zones.

Senior Housing

The Zoning Ordinance currently defines “senior housing development” as a residential project that may exceed the maximum density permitted for families in the zone in which it is located and which is established and maintained for the exclusive use of low-income or moderate-income senior residents. The City will revise its definition to be consistent with California Civil Code Section 51.3.

Senior housing developments may be approved in residential, commercial, and mixed use overlay districts. Because the residents of such developments have dwelling characteristics which often differ from those of families and younger persons, it may not appropriate to apply all of the normal zoning standards thereto. Accordingly, pursuant to a CUP, the Planning

Commission and the City Council may make exceptions to the density, off-street parking, minimum unit size, open space and such other requirements as may be appropriate. The Planning Commission may also adjust required setbacks, building height and yard areas as appropriate to provide an adequate living environment, both within the development and on nearby properties.

Second Dwelling Units

Second dwelling units are attached or detached dwelling units that provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation. Second units may be an alternative source of affordable housing for lower-income households and seniors.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which second dwelling units are permitted (Government Code Section 65852.2). A jurisdiction cannot adopt an ordinance that precludes the development of second units unless findings are made acknowledging that allowing second units may limit housing opportunities of the region and result in adverse impacts on public health, safety, and welfare.

In 1994, the City of Imperial Beach precluded second dwelling units from the R-1-6000 and R-1-3800 residential zones. Second units are allowed by right in the R-3000, R-2000, and R-1500 zones. In accordance with Government Code Section 65852.2, the City acknowledged that precluding second units in single-family residential zones may limit some housing opportunities; however, the City Council determined that allowing second units is not in the best interest of the public health, safety, and welfare, based upon the following adverse impacts:

1. Existing neighborhood patterns will be disrupted;
2. Excessive density will adversely affect police and fire protection services;
3. Health and psychological problems will be created due to overcrowding;
4. In light of decreasing State subventions, an added fiscal drain would be placed on the City to enforce a permissive second-unit ordinance;
5. Further strain will be placed on the existing sewer system;
6. Additional traffic congestion would be caused on major streets;
7. Aesthetic impacts on neighborhoods will result from unplanned residential construction;
8. An increase in neighborhood noise levels and demands for noise ordinance enforcement would occur; and
9. New construction would deprive existing residences of adequate natural light and air circulation.

The City's preclusion of second dwelling units from single-family zones has not constrained development of this important housing type in Imperial Beach. Between 2005 and 2011, 79 second dwelling units were constructed in the R-3000, R-2000, and R-1500 residential zones, where second dwelling units are allowed by right.

Transitional and Supportive Housing

California Health and Safety Code (Section 50675.2) defines "transitional housing" and "transitional housing development" as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing

can take several forms, including group quarters with beds, single-family homes, and multi-family apartments and typically offers case management and support services to help return people to independent living (often six months to two years).

Supportive housing links the provision of housing and social services for the homeless, people with disabilities, and a variety of other special needs populations. California Health and Safety Code (Section 50675.2) defines “supportive housing” as housing with no limit on length of stay, that is occupied by the low income adults with disabilities, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

Currently, the Imperial Beach Zoning Ordinance does not explicitly address transitional or supportive housing facilities. The Zoning Ordinance will be amended to specifically define transitional/supportive housing. Transitional housing pursuant to Health and Safety Code Section 50801(i) will be permitted in all zones where housing is permitted and subject to the same development standards as the same type of housing in that zone. Supportive housing pursuant to Health and Safety Code Section 50675.14(a)(B)(2) will be permitted in all zones where housing is permitted and subject to the same development standards as the same type of housing in that zone.

Emergency Shelters

An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited short-term basis. On August 15, 2012, the City amended the Zoning Ordinance to address the provisions of the C/MU zones. As part of that effort, emergency shelter for the homeless is identified as a permitted use in the C/MU1 zone. Consistent with State law, the Zoning Ordinance was revised to identify emergency shelters as a permitted use in the C/MU1 areas within the Palm Avenue study corridor. Emergency shelters will be permitted via an administrative review process with no discretionary review. The Palm Avenue corridor study area covers 123 net acres on 321 parcels. Many of these parcels are developed with older, low intensity, and outdated uses. Therefore, adequate capacity exists to accommodate an emergency shelter for at least 28 homeless individuals (identified unsheltered homeless population in Imperial Beach) and at least one year-round emergency shelter. These properties can either be redeveloped or adapted to accommodate emergency shelters. Specifically, the Palm Avenue corridor traverses the heart of the City and potential emergency shelter sites would be near services and along major transportation corridors. Such locations are ideal for housing persons who would require access to social and supportive services.

Single-Room Occupancy

SRO units are one-room units intended for occupancy by a single individual. They are distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. The City will amend the Zoning Ordinance to facilitate the provision of SROs consistent with State law. SROs will be conditionally permitted in the C/MU-1 zone as a use in conjunction with other multi-family housing or mixed use developments. SROs will be encouraged and facilitated through identification of potential locations and through city assistance with grant writing.

Live/Work Units

To facilitate pedestrian activity and mixed-use development within commercial corridors, the City amended the Zoning Ordinance to allow these units by right within the C/MU zones.

Farmworker Housing

As an urbanized community, there is no land within Imperial Beach designated for agricultural use and no zone allows agricultural uses. The Census identified only 165 persons employed with farming, forestry, and fishery occupations in 2000. This represents less than one percent of the City's population. Therefore, the City has no specific need for farmworker housing.

Employee Housing

Currently, the City's Zoning Ordinance does not specially address employee housing. The City will amend the Zoning Ordinance to comply with Section 17021.5 of the State Health and Safety Code regarding employee housing. Any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation for the purposes of this section of the Health and Safety Code.

3.2.5 Housing for Persons with Disabilities

Both the federal Fair Housing Amendment Act (FHAA) 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.

As part of this Housing Element update, the City conducted an analysis of the Zoning Ordinance, permitting procedures, development standards, and building codes to identify potential constraints for housing for persons with disabilities. The City's policies and regulations regarding housing for persons with disabilities are described below.

Zoning and Land Use

Restrictive land use policies and zoning provisions can constrain the development of housing for persons with disabilities.

Definition of Family

Local governments may restrict access to housing for households failing to qualify as a "family" by the definition specified in the Zoning Ordinance. Specifically, a restrictive definition of "family" that limits the number of and differentiates between related and unrelated 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.⁶

The City of Imperial Beach Zoning Ordinance defines "family" as means an individual, or two or more persons related by blood or marriage, or a group of unrelated individuals living together

⁶ California court cases (*City of Santa Barbara v. Adamson*, 1980 and *City of Chula Vista v. Pagard*, 1981, etc.) have ruled an ordinance as invalid if it defines a "family" as: (a) an individual; (b) two or more persons related by blood, marriage, or adoption; or (c) a group of not more than a specific number of unrelated persons as a single housekeeping unit. These cases have explained that defining a family in a manner that distinguishes between blood-related and non-blood related individuals does not serve any legitimate or useful objective or purpose recognized under the zoning and land use planning powers of a municipality, and therefore violates rights of privacy under the California Constitution.

and bearing the generic character of a relatively permanent bona fide housekeeping unit sharing such needs as cooking facilities. The Zoning Ordinance also defines “family” to include persons living together in a licensed “residential facility” servicing six or fewer persons as that term is defined in California Health and Safety Code Section 1502(a)(1). The City’s definition is not a constraint because it does not limit the number of or differentiate between related and unrelated individuals occupying a dwelling unit.

Residential Care Facilities

Under State Lanterman Developmental Disabilities Services Act (aka Lanterman Act), small licensed residential care facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential districts; Imperial Beach is compliant with the Lanterman Act. The City has no distance and siting requirements for residential care facilities.

Parking Standards

All multi-family complexes are required to provide handicapped parking spaces, depending on the size of the development. The City is flexible and works with the developers of special needs housing and will reduce parking requirements if the applicant can demonstrate a reduced need for parking. For example, the Zoning Ordinance authorizes the Planning Commission/City Council to make exceptions to development standards, including off-street parking requirements, for senior housing developments.

Reasonable Accommodation

Otherwise regular development standards under unique circumstances may be found constraining to the development or improvement of housing for persons with disabilities. Therefore, it may be reasonable to accommodate requests from persons with disabilities to waive a specific requirement or standard of the Zoning Ordinance to ensure that homes are accessible for the mobility impaired. For example, a setback and encroachment standard may need to be relaxed in order to accommodate the construction of a ramp. Whether a particular modification is reasonable depends on the circumstances, and must be decided on a case-by-case basis.

The City will amend its Zoning Ordinance to establish the process for requesting and grant reasonable accommodations in the application of the Zoning regulations for persons with disabilities. Requests for reasonable accommodation will be reviewed and decided by the Community Development Director. The decision will be based on the following criteria:

- The accommodation is reasonable considering the nature of the applicant’s disability, the surrounding land uses, and the rule, standard, policy, or practice from which relief is sought.
- The accommodation is necessary to afford the applicant equal opportunity to enjoy and use a dwelling.
- The accommodation will have only incidental economic or monetary benefits to the applicant, and the primary purpose of the accommodation is not to assist with real estate speculation or excess profit taking.
- The accommodation does not create a substantial adverse impact on surrounding land uses, or a public nuisance, that cannot be reasonably mitigated.
- The accommodation is reasonably feasible considering the physical attributes of the property and structures.
- There are no alternative accommodations which may provide an equivalent level of benefit to the applicant, while minimizing adverse impacts on surrounding land uses and

lessening the financial and/or administrative burden on the City.

- In the case of a determination involving a one-family dwelling, whether the household would be considered a single housekeeping unit if it were not using special services that are required because of the disabilities of the residents.
- The requested accommodation does not impose an undue financial or administrative burden on the City.
- The requested accommodation does not require a fundamental alteration in the nature of a program.

Building Codes

The City enforces the California Building Code (CBC), which regulates the access and adaptability of buildings to accommodate persons with disabilities. Furthermore, Government Code Section 12955.1 requires that 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 are 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 test.
- At least one powder room or 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, powder rooms, bathrooms, living rooms, bedrooms, or hallways.
- Common use areas shall be accessible.
- If common tenant parking is provided, accessible parking is required.

Compliance with provisions of the Code of Regulations, CBC, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building and Safety Division of the Community Development Department as a part of the building permit submittal.

The City has not adopted any amendments to the CBC that might diminish the ability to accommodate persons with disabilities. In fact the City of Imperial Beach rigorously enforces the disabled access provisions found in Chapters 11A (Housing Accessibility) and 11B (Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Publically Funded Housing) of the CBC.

Conclusion

The City has not adopted unique restrictions that would constrain the development of housing for persons with disabilities. The State has removed any City discretion for review of small group homes for persons with disabilities (six or fewer residents). The City does not impose additional zoning, building code, or permitting procedures other than those allowed by State law. There are no City initiated constraints on housing for persons with disabilities caused or controlled by the City. The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. Such retrofitting is permitted under State law. Although the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint, the City does not have a formal procedure for processing accommodation requests. The City will adopt a ministerial procedure for review and approval of reasonable accommodation requests to mitigate this constraint.

3.2.6 Planning and Development Fees

Developers are subject to a variety of fees and exactions to cover the cost of processing permits and providing necessary services and facilities. In general, these fees can be a constraint on housing development and compromise affordability because the additional cost borne by developers contributes to overall increased housing unit cost. However, the fees are necessary to maintain adequate planning services and other public services and facilities in the City. Planning fees for a typical residential project is displayed in Table H-37. The City's planning fees are deposit-based. If the actual cost of providing a service under this title is less than the amount deposited, the City returns the balance to the applicant. If the actual cost of providing a service is more than the amount deposited, the City collects the balance from the applicant. Surrounding jurisdictions also implement a full cost recovery policy for planning and development fees. Imperial Beach's initial deposits are moderate when compared to these neighboring jurisdictions (see Table H-38).

Review/Permit	Deposit
CEQA	\$1000
Initial Assessment	\$2000
Negative Declaration	\$7000
Environmental Impact Report	
Coastal Permit	
Administrative	\$1,500
Regular	\$2,000
Conditional Use Permit	\$2,000
Design Review	\$1,500
General Plan Amendment	\$5,000
Rezone	\$3,000
Site Plan Review	\$3,000
Subdivisions	
Boundary Adjustment	\$500
Tentative Parcel Map	\$2,500
Parcel Map	\$2,000
Tentative Map	\$3,000
Final Map	\$2,500
Variance	\$1,800
<i>Source: City of Imperial Beach, 2011.</i>	

Fee Type	Imperial Beach	National City	Chula Vista	San Diego
Coastal Development Permit				
--Administrative	\$1,500	\$2,183	\$5,000	\$8,000
--Regular	\$2,000	\$2,485	\$11,000	
Conditional Use Permit	\$2,000	\$1,973	\$11,000	\$8,000
Variance	\$1,800	\$2,005	\$9,000	\$8,000
Rezone	\$3,000	\$2,485	\$10,000	\$12,000
General Plan Amendment	\$5,000	\$2,485	\$20,000	\$12,000
Tentative Parcel Map	\$2,500	\$1,625	\$10,000	\$2,500
Tentative Tract Map	\$3,000	\$2,485	\$10,000 - \$20,000	\$10,000
<i>Sources: City of Imperial Beach, 2011; City of National City, 2011; Chula Vista, 2011; and City of San Diego, CA.</i>				

Development impact fees are established for mitigating various development impacts based on the specific existing conditions of and projected needs for infrastructure and public facilities, usually due to rapid growth. Therefore, comparing the levels of impact fees across communities does not recognize the unique circumstances for establishing these fees. Furthermore, impact fees are subject to the requirements of State law for ensuring reasonableness and proportionate share of responsibility. The key development impact fees charged by the City include: water, sewer, public facilities, and school fees. Overall fees charged by the City are limited and do not constrain housing development. The City does not distinguish between single-family or multi-family when calculating impact fees. The South Bay Unified and Sweetwater Union High School Districts also charge development impact fees. These fees are set by the school districts and updated periodically to offset school facilities impacts pursuant to SB 50. Table H-39 below summarizes the fee estimates for a typical single-family unit and a typical small multi-family development.

Table H-39: Fee Estimate for Single- and Multi-Family Housing (2012)		
Fee	Single-Family (Detached Unit)	Multi-Family (5-Unit Apartment with Garage)
Habitable Area	1,482 sq. ft.	6,656 sq. ft.
Garage Area	441 sq. ft.	2,280 sq. ft.
Total Valuation	\$224,087.00	\$675,268.00
Building Plan Check Fees	\$1,609.91	\$4,211.78
Building Permit Fees	\$2,476.78	\$6,479.66
Electrical Permit Fees	\$226.00	\$275.00
Plumbing Permit Fees	\$214.00	\$694.00
Mechanical Permit Fees	\$125.00	\$345.00
Energy Plan Check & Inspection Fees	\$ 210.00	\$560.00
Disabled Access Plan Check & Inspection Fees	---	\$280.00
SMIP(Strong Motion Instrumentation Program) Fee	\$20.00	\$67.53
Imaging Fee	\$2.00	\$2.00
Sewer Capacity Charge	\$1,230.00	\$6,150.00
Residential Construction Cost	\$1,100.00	\$5,200.00
Transnet Fees	\$2,165.00	\$10,825.00
Total City Fees	\$9,378.69	\$35,089.97
School Impact Fees	\$4,045.86	\$18,170.88
Total City & School District Fees	\$13,424.55	\$53,260.85
Per Unit Fee	\$13,424.55	\$10,652.17

Source: City of Imperial Beach, 2012.

Overall, planning and development impact fees in the City represent less than five percent of the overall development costs and do not constrain housing development in the City. The Community Development Director may waive portions of any deposit if certain aspects of a permit may be inapplicable or if multiple permits are processed concurrently. The City has waived impact fees for affordable housing projects and will review the appropriateness of reducing, waiving, and/or deferring impact and/or processing fees for units affordable to very low and low income households, including senior housing, and apartment units, and housing for special needs groups, including agricultural employees, emergency /transitional housing, and housing for persons with disabilities, to make the development of such units more financially feasible.

3.2.7 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. Given the built out character of Imperial Beach, most residential areas are already served with infrastructure. The City has established specific standards for improvements and facilities to serve new development, including: curb/gutter and drainage facilities, sidewalks, paved streets, landscaping and water and sewer service. Such improvements are required as a condition of the subdivision map, or if there is no required map, improvements are required as part of the building permit. These on- and off-site improvements promote the health, safety and general welfare of the public.

Curbs/gutters and drainage facilities direct storm and runoff water out of residential developments. City roadways are required to be paved. Pavement creates an all-weather roadway, facilitates roadway drainage, and reduces dust. It also produces a high-speed circulation system and facilitates relatively safe traffic movement. Roadways are classified by the City according to traffic needs and are defined as follows:

- Arterial: six lanes with 80 feet right-of-way
- Major Street: four lanes, 80 feet right-of-way
- Collector: two to four lanes, with a 60 to 80 foot right-of-way
- Residential: two lanes, 50 foot right-of-way

Arterials, major streets, and collectors are designated on the General Plan according to existing and projected needs. Developers are responsible for the provision of roadways that are necessary to serve the project site. Sidewalks are also required for new residential development. Where sidewalks are available, safety of pedestrian traffic is enhanced, particularly for school-age children, the elderly and the physically impaired.

Landscaping is required for all zoning districts. Such required landscaping includes, but may not be limited to, shrubbery, trees, grass and decorative masonry walls. Landscaping contributes to a cooler and more aesthetic environment in the City by providing relief from developed and paved areas. All landscaping is installed by the developer.

Development of, and connection to, municipal water and sewer services are required as a condition of approving tract maps. Water service is necessary for a constant supply of potable water. Sewer services are necessary for the sanitary disposal of wastewater. These off-site requirements allow for the development of much higher residential densities.

3.2.8 Development Permit Procedures

Development review and permit processing procedures are necessary steps to ensure that residential construction proceeds in an orderly manner. The following discussion outlines the level of review required for various permits and timelines associated with those reviews. The timelines provided are estimates; actual processing time may vary due to the volume of applications and the size and complexity of the projects.

Imperial Beach encourages the joint processing of related applications for a single project. As an example, a rezone petition may be reviewed in conjunction with the required site plan, coastal development permit, a tentative tract map, and any necessary variances. The vast

majority of projects in Imperial Beach are governed by discretionary processes because the City is within a Coastal Zone. Therefore, most projects (with the exception of single-family homes outside the Coastal Zone) require discretionary permitting.

The City Council of Imperial Beach also acts as the Planning Commission, allowing more efficient processing of development reviews. Table H-40 below outlines the development review and approval procedures for residential developments. There are no differences in the review and approval processes between single-family and multi-family developments. For ministerial building permits, the issuance time is approximately two months. For discretionary permits that require a coastal permit, site plan and design review, and a tentative map, the time would be from 2.5 months to five months. Several more months of review is required for projects that require an Environmental Impact Report (EIR). On average, total processing time for an application can take two to six months depending on the complexity of the project.

Table H-40: Typical Permit Processing Timelines		
Action/Request	Processing Time	Comments
Environmental Impact Report	6-12 months	Processing and review time limits controlled through CEQA. Accepted by decision making body
Negative Declaration	4-6 months	Processing time can be extended if the project has a longer review and approval period. Adopted by decision-making body.
General Plan Amendment	1 year	Gov. Code Section 65358 limits the number of times any element of the General Plan can be amended each calendar year. Requires a public hearing for the City Council.
Zone Change	9-12 months	Certain procedures and time limits established by Gov. Code Sections 65854-65857. Approved by the City Council.
Tentative Parcel Map	3-5 months	Approved by the City Council.
Site Plan Review	90 days	Approved by the Community Development Department and the City Council depending on the nature of the project
Design Review	90 days	Approved by the Community Development Department and the Design Review Board depending on the nature of the project.
Coastal Permit	2-6 months	Approved by staff or the City Council and then reported to the Coastal Commission.
Tentative Map	120 days	Approved by the Planning Commission/City Council.
Variance	60 days	Approved by the Planning Commission/City Council.
Conditional Use Permits	90 days	Approved by the Planning Commission/City Council.

Source: City of Imperial Beach, 2011.

Design Review

All development projects proposed adjacent to the Imperial Beach’s major corridors are subject to review by the City’s Design Review Board. Residential projects of four or fewer units located outside of major corridors are subject to design review by the Community Development Department. The Design Review Board and Community Development Department review projects in accordance with the City’s “Design Manual and Design Review Guidelines,” with the exception of areas within the City for which specific unique design criteria have been established. Design Review for typical projects takes 90 days. Design review can occur concurrently with other reviews.

Site Plan Review

Site Plan Review is required to promote the best and most appropriate site development of property to ensure that proposed development is not detrimental to the neighborhood or city in

general. All single-family projects proposed in the R-3000, R-2000, and R-1500 zones that contain two to four units require Site Plan Review approval by the Community Development Department and five or more units require Site Plan Approval by the Planning Commission. Similarly, multi-family projects containing two to four units require Site Plan Review approval by the Community Development Department and five or more units require Site Plan Review approval by the Planning Commission (City Council). A public hearing is required for all residential projects that require Site Plan Review.

The Planning Commission (City Council) and/or Community Development Department must consider the following factors when considering a Site Plan Review application:

- That the proposed use does not have any detrimental effect upon the general health, welfare, safety and convenience of persons residing or working in the neighborhood, or is not detrimental or injurious to the value of the property and improvements in the neighborhood;
- That the proposed use does not adversely affect the general plan or local coastal program;
- That the proposed use is compatible with other existing and proposed uses in the neighborhood;
- That the location, site layout and design of the proposed use properly orients the proposed structures to streets, driveways, sunlight, wind and other adjacent structures and uses in a harmonious manner;
- That the combination and relationship of one proposed use to another on the site is properly integrated;
- That access to and parking for the proposed use does not create any undue traffic problem;
- That all other applicable provisions of this title are complied with; and
- Any other considerations, as the planning commission and/or community development department deem necessary, to preserve the health, welfare, safety and convenience of the city in general.

The City works with project applicants to resolve site design and operational issues, either through modifications to the site design or through conditions of the site plan approval. The City has not denied uses based on concerns relating to site design and other operational issues.

Coastal Development Permit

Most of the City is located within the Coastal Zone and almost all residential development applications require Coastal Development Permit approval.⁷ Residential applications for more than four units that require Site Plan Review are set for at least one public hearing before the Planning Commission (City Council) unless the project is determined to qualify for administrative approval, in which case it is processed by the Community Development Department. A Coastal Development Permit is approved for all projects that conform to the California Coastal Act, the Local Coastal Plan, and all other applicable planning and zoning regulations of the City. Review and approval can take approximately two to six months depending on project complexity.

⁷ Building permits for improvements to most single family residences are exempt.

Conditional Use Permit

The City requires a CUP for various types of residential development applications, including Mobile Home Parks, Boarding Houses, Residential Care Facilities (in commercial districts), Mixed Use projects, and Senior Housing Developments. A CUP is required because of the unusual or unique characteristics of proposed land uses, the need to give special consideration to the proper location of such uses in relation to adjacent uses, and the lack of criteria for the inclusion of or exclusion of such uses in the zone. Planning Commission (City Council) review and approval of CUP applications takes approximately 90 days, depending on project complexity.

The Zoning Ordinance establishes the same criteria for review and approval of all CUP applications, regardless of proposed use. To approve a CUP, the Planning Commission (City Council) must make the following findings:

- That the proposed use at the particular location is necessary or desirable to provide a service or facility which will contribute to the general well-being of the neighborhood or community;
- That such use will not, under the circumstances of the particular use, be detrimental to the health, safety or general welfare of persons residing or working in the vicinity, or injurious to property or improvements in the vicinity;
- That the proposed use will comply with the regulations and conditions specified in this title for such use and for other permitted uses in the same zone; and
- That the granting of such conditional use will be in harmony with the purpose and intent of this code, the adopted general plan and the adopted local coastal program.

Conclusion

The City works closely with developers to approve single-family projects and multifamily projects in order to expedite approval procedures so as not to put any timing constraints on development. For a typical project, an initial meeting with the Community Development Department can be arranged to discuss the development proposal. Then a discretionary permit application must be filed, which is first reviewed by the Planning Department and other agencies such as Public Works for consistency with City ordinances and General Plan guidelines. Depending upon the nature of the project, the Community Development Department approves the project or the Department makes recommendations to the Planning Commission (City Council) on a discretionary approval. After the project is approved, the Building Department performs plan checks and issues building permits. Throughout construction, the Building Department will perform building inspections to monitor the progress of the project. This process does not put an undue time constraint on the development of projects because of the close working relationship between City staff, developers, and the decision-making body.

3.2.9 Building Codes and Enforcement

The City of Imperial Beach enforces and administers the 2010 California Building Code (CBC) as mandated by the State of California. Newly constructed and renovated buildings must conform to the standards of the CBC. The City has not adopted any amendments to the CBC. The Code Compliance Division which is a section of the Community Development Department enforces applicable building codes.

Compliance with the CBC should not significantly add to the cost of construction since the Code is mandated to be enforced statewide and costs should be relatively uniform across the State of

California. Any costs associated with Building Code standards are necessary to protect the health safety and welfare of the citizens. Compliance ensures that all new or renovated buildings are structurally sound, have proper exiting and are equipped with necessary fire protection features. In addition the CBC mandates energy efficiency as well as provisions for access for persons with disabilities.

3.3 State and Federal Regulations

State and federal requirements may act as a barrier to the development or rehabilitation of housing, and affordable housing in particular. These include State prevailing wage requirements and environmental review requirements.

3.3.1 State Prevailing Wage Requirements

Labor Code Section 1720, which applies prevailing wage rates to public works of over \$1,000, defines public works to mean construction, alteration, installation, demolition, or repair work done under contract and paid for in whole or in part out of public funds. For example, public transfer of an asset for less than fair market value, such as a land write-down, would be construed to be paid for in part out of public funds and trigger prevailing wage requirements.

While the cost differential in prevailing and standard wages varies based on the skill level of the occupation, prevailing wages tend to add to the overall cost of development. In the case of affordable housing projects, prevailing wage requirements could effectively reduce the number of affordable units that can be achieved with public subsidies. The following types of projects are not however required to pay prevailing wages:

- Residential projects financed through issuance of bonds that receive an allocation through the State; or
- Single-family projects financed through issuance of qualified mortgage revenue bonds or mortgage credit certificates.

3.3.2 Environmental Protection

State and federal regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, development review permits, etc.). Costs resulting from the environmental review process are also added to the cost of housing and are passed on to the consumer. These costs include the preparation of environmental analyses, and from delays caused by the mandated public review periods. However, the presence of these regulations helps preserve the environment and ensure environmental safety to Imperial Beach residents. Furthermore, recent State laws have established exemptions from CEQA for infill and affordable housing projects.

3.4 Infrastructure Constraints

The provision of infrastructure such as water and sewer to serve residential development is costly to local governments and special districts providing municipal services. This section provides an overview of potential utility service constraints in Imperial Beach.

3.4.1 Water

The City of Imperial Beach is served by the California American Water Company, a private water service that provides water to services to an area it refers to as the San Diego County District (formerly the Coronado District). California American Water Company purchases treated potable water from the City of San Diego. The City of San Diego obtains raw water from local reservoirs, the San Diego County Water Authority, and the Metropolitan Water District. The San Diego County District also has three emergency interconnections, one with each of the following: Otay Water District, Sweetwater Authority and North Island Naval Air Station. The Metropolitan Water District supplies the majority of raw water to the City of San Diego. The Metropolitan Water District obtains raw water from the Colorado River, via aqueduct, and the Sacramento Delta. The City of San Diego then treats the raw water at its three water treatment plants.

According to California American Water Company's 2010 Urban Water Management Plan (UWMP), in 2005 the company delivered 12,471 acre feet of water to the service area (which includes Imperial Beach). The projected service demand is expected to decline slightly to 12,344 acre feet by 2020 and increase only modestly to 13,008 acre feet by 2030. The California American Water Company entered a 25-year water purchase contract with the City of San Diego in 2004, which entitles the service area to at least 60 percent of the average system delivery per customer per day. However, according to the UWMP, the City of San Diego expects to be able to deliver 100 percent of the District's demand through 2010. The UWMP also anticipates adequate water supply to meet projected future demand through 2030 under single and multiple dry year scenarios. Therefore, adequate water supply is available to accommodate the RHNA during the Housing Element planning period.

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water 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 copy of the adopted Housing Element to the California American Water Company within 30 days of adoption. The City will continue to coordinate with the California American Water Company to ensure priority service provision to affordable housing developments.

3.4.2 Wastewater

The City of Imperial Beach is a member of the San Diego Metropolitan Sewerage System (Metro). The City operates its own waste water collection system and transports the sanitary waste to Metro's South Bay Interceptor which conveys it to the regional water treatment plant on Point Loma. The present collection system consists of 11 pump stations and approximately 50 miles of sewer lines. Based on the 2000 Amendment to the Regional Wastewater Disposal Agreement between the Cities of San Diego, Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, Poway, and various wastewater producing special districts, the City of Imperial Beach purchased a quantity of wastewater treatment capacity based on then current and existing needs. At that time, Imperial Beach purchased 3.59 Million Gallons of treatment per day (MGD). According to recent billing statements from the City of San Diego, Imperial Beach averages approximately 2.25 MGD, leaving approximately 1.34 MGD of capacity available for future growth. This represents usage of approximately 37 percent of the total available under the existing contract. Assuming a new dwelling unit generates approximately 250 gallons of wastewater per day, 254 new units through the planning period

would produce approximately 0.06 MGD, or 4.5 percent of the City's remaining contract capacity. With substantial capacity available, there would be no constraints on the availability of wastewater disposal or treatment.

Senate Bill 1087 also mandates priority sewage collection and treatment service to housing developments providing units affordable to lower-income households. The City will provide a copy of the adopted Housing Element to Metro within 30 days of adoption. The City will continue to coordinate with Metro to ensure priority service provision to affordable housing developments.

3.5 Environmental Constraints

A community's environmental setting affects the feasibility and cost of developing housing. Environmental issues range from the availability of water to the suitability of land for development due to potential exposure to seismic, flooding, and other hazards. If not properly recognized and accommodated in residential design, these environmental features could potentially endanger lives and property. This section summarizes these potential constraints on residential development in Imperial Beach.

3.5.1 Habitat and Hazardous Materials

None of the parcels identified in the residential sites inventory are constrained by sensitive habitat (including wetlands) or contamination that would prohibit developers from building. The vacant sites identified in the land survey are infill sites and are flat and generally rectangular in shape. As a result no major grading would be required on these parcels. The underutilized sites are infill commercial sites with potential to redevelop with residential uses on all floors above ground level.

3.5.2 Flooding

The Tijuana River Valley is subject to floods of great magnitude since it is the drainage way for the largest of the watershed basins in San Diego County. This drainage basin covers 1,700 square miles, only 27 percent of which lies within the United States. The River crosses the border at a point five miles inland from the Pacific Ocean and flows through the fertile Tijuana River Valley. This valley area is predominantly agricultural and open space. At the point where the river approaches the Imperial Beach City limits, it turns into an estuary. Most of the identified 100-year floodplain encompasses the estuary. This area has been designated as open space, due in part to its location in a flood plain, and in part to the natural habitat of the area. None of the parcels identified in the residential sites inventory are located within a floodplain.

3.5.3 Earthquakes

Available data indicates there are three major regional zones of faulting within the San Diego Region: (1) The San Jacinto Fault Zone, located in the eastern part of the County, is considered to be a major active branch of the San Andreas fault system; (2) The Elsinore fault zone paralleling the San Jacinto fault zone is the largest known active fault in the County of San Diego. (3) The Rose Canyon fault zone, paralleling the Pacific coastline, is considered to be the possible southeasterly extension of the Newport-Inglewood fault zone. None of the parcels identified in the residential sites inventory are located on known fault lines. The City requires engineering reports to establish appropriate design standards and mitigation measures taken to alleviate these hazards. However, the necessity of these reports is offset by the need for public safety and welfare, and thus the City does not consider the reports a constraint to housing development.

3.5.4 Farmland

None of the parcels identified in the residential sites inventory are covered by a Williamson Act contract.

Section 4: Housing Opportunities and Resources

Resources that are available for the development, rehabilitation, and preservation of housing in the City of Imperial Beach 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. Opportunities for energy conservation are also explored.

4.1 Future Housing Needs

State law requires each community to play a role in meeting the region's housing needs. As such, the San Diego Association of Governments (SANDAG) has allocated the City of Imperial Beach housing production goals through year 2020. This section discusses how Imperial Beach has adequate existing residential site capacity to accommodate its share of regional housing needs during the planning period.

4.1.1 RHNA Requirement

The Regional Housing Needs Allocation (RHNA) developed and adopted by SANDAG covers an eleven-year growth projection and planning period (January 1, 2010 through December 31, 2020). The RHNA assigns a housing production to each jurisdiction in the region. Imperial Beach must identify adequate land with appropriate zoning and development standards to accommodate its allocation of the regional housing need.

According to the RHNA, Imperial Beach's share of regional future housing needs is a total of 254 new units between January 1, 2010 and December 31, 2020. This allocation is distributed into four income categories, as shown below in Table H-41. The RHNA includes a fair share adjustment which allocates future (construction) need by each income category in a way that meets the State mandate to reduce over-concentration of lower income households in historically lower income communities or areas within the region.

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less)*	30	11.8%
Very Low (31 to 50%)	33	13.0%
Low (51 to 80%)	48	18.9%
Moderate (81% to 120%)	45	17.7%
Above Moderate (Over 120%)	98	38.6%
Total	254	100.0%

Source: Final Regional Housing Needs Allocation, SANDAG, 2011.

AMI = Area Median Income

Note: * The City has a RHNA allocation of 63 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, 29.5% of City households earned less than 50 percent of the AMI. Among these households, 46.9 percent earned incomes below 30% (extremely low). Therefore the City's RHNA allocation of 63 very low income units may be split into 30 extremely low and 33 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.

4.1.2 Credits toward the RHNA

The RHNA is an 11-year planning goal. Housing units built, under construction, or approved from January 1, 2010 onward can be credited towards meeting the City's RHNA. These units can be subtracted from the City's share of regional housing needs. The City must demonstrate in this Housing Element its ability to meet the remaining housing needs, through the provision of sites, after subtracting units under construction or anticipated (Table H-42).

Income/ Affordability Category	RHNA	Units Built	Units Under Construction	Units Approved	Units Pending Approval	Remaining Units Deficit
Very Low	63	0	0	3	0	60
Low	48	0	0	26	6	16
Moderate	45	0	4	1	0	40
Above Moderate	98	6	0	0	0	92
Total	254	6	4	30	6	208

Units Constructed

Since January 1, 2010, six single-family units have been constructed. These include: one single-family unit at 604 7th Street was constructed on March 1, 2010; one single-family unit at 1194 Connecticut Street was constructed on November 3, 2011; three single-family units at 1022, 1024, and 1026 Elm Avenue were constructed on December 1, 2011, and one single-family unit at 1221 East Lane was constructed on March 22, 2012.

Units under Construction

A total of four dwelling units within mixed use developments were under construction as of April 2012 (Figure H-10). The narrow 5,800 square-foot lots located in the C-3 (Neighborhood Commercial) zone will include ground floor commercial uses and achieve more than 80 percent of the allowable maximum density and meet all applicable development standards, including setbacks, building height, and parking. As demonstrated in the Community Profile of this Housing Element, moderate income households can afford to purchase a median priced home in Imperial Beach and the market provides a wide range of affordable rental options. Therefore, it is reasonable to assume that these units will be offered at rents affordable to moderate income households.

Figure H-10: Units under Construction

Before



1120 13th St (633-022-20-00) on 5,800 SF lot

Under Construction



Before



1150 13th St (633-022-16-00) on 5,800 SF lot

Under Construction



Units Approved

On October 5, 2011, the City Council approved a 30-unit mixed use development located on the northeast corner of Palm Ave. and Florence St. The project received a density bonus, modifications of development standards, and other incentives to achieve 53 units per acre. Of the 30 units, three will be deed-restricted affordable for very low income households, 26 for low income households, and there will be one manager unit. Because all multi-family rental housing in Imperial Beach is affordable to moderate income households, it is reasonable to assume that the manager unit will also be affordable to a moderate income household.

Units Pending Approval

On February 14, 2012, Habitat for Humanity applied to construct six low income townhomes on a vacant 10,500 square foot lot acquired by the City's former redevelopment agency. The property is located at 776 10th Street, in the C-1 zone (APN# 626-282-12-00).

Remaining Housing Need to be Accommodated

After accounting for units under construction and approved since January 1, 2010, a remaining need of 208 units exists, including 60 very low income, 16 low income, 40 moderate income units, and 92 above moderate income units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by December 31, 2020.

4.1.3 Anticipated Second Dwelling Units

Second dwelling units are allowed by-right on over 2,900 parcels covering nearly 400 acres zoned R-3000, R-3000-D, R-2000, and R-1500. In the five-year period between January 1, 2005, and December 31, 2009, property owners constructed 79 second dwelling units. Based

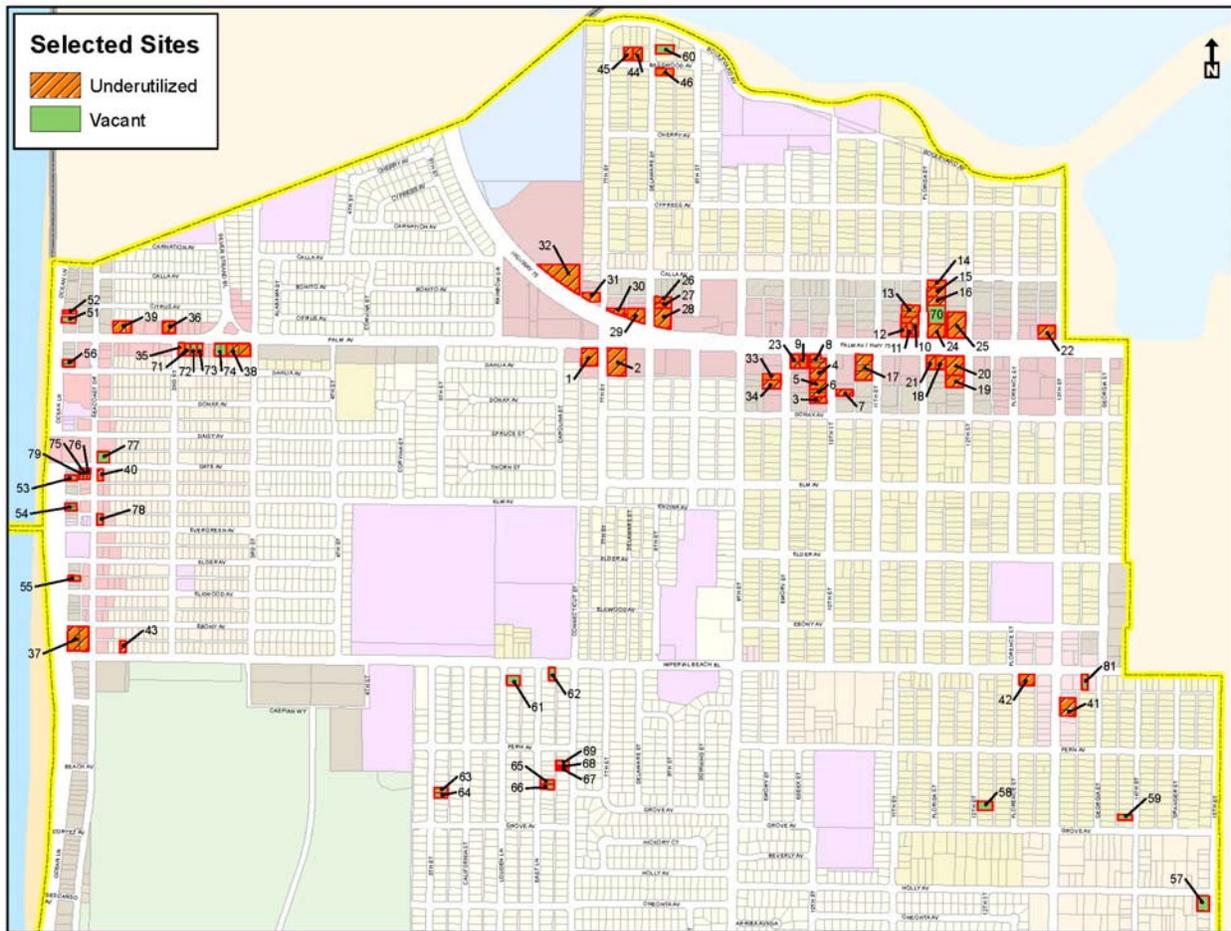
on historical level of production, the City anticipates at least 56 new second dwelling units through the end of the planning period. This represents an average of seven second dwelling units per year from 2012 through 2020, which is less than half the average number of units constructed annually during the last Housing Element planning period. Given the housing affordability analysis contained in the Community Profile, the City expects that all new second dwelling units constructed in Imperial Beach will be affordable to lower income households. However, because the City does not require that these units be deed restricted as affordable to lower income households, moderate income affordability is assumed for the purposes of the RHNA.

4.1.4 Residential Sites Inventory

As part of this Housing Element update, City staff identified residential sites that could accommodate Imperial Beach’s future housing needs. Table H-43 includes a summary of the detailed inventory of vacant and underutilized sites contained in Appendix C. As shown in Figure H-11, each identified site is adjacent to developed land and can be readily served with existing infrastructure.

Table H-43: Vacant and Underutilized Sites Summary							
Zoning	Parcel Count	Total Acres	Max Density	Max Capacity	Realistic Capacity		Affordability
					80% Max Density*	50% Mixed Use**	
<i>Vacant</i>							
R-1-6000	9	0.9	7 du/a	9 units	9 units	N/A	Moderate
R-3000 & R-3000-D	3	0.6	14 du/a	8 units	8 units	N/A	Moderate
R-2000	1	0.3	21 du/a	6 units	5 units	N/A	Moderate
R-1500	8	0.7	29 du/a	17 units	13 units	N/A	Moderate
C-3	1	0.1	21 du/a	3 units	2 units	1 unit	Moderate
C-2	10	1.6	29 du/a	42 units	35 units	18 units	Above
C-1	1	0.5	43 du/a	21 units	17 units	8 units	Lower
<i>Underutilized</i>							
R-3000-D	3	0.6	14 du/a	8 units	6 units	N/A	Moderate
R-2000	1	0.1	21 du/a	2 units	2 units	N/A	Moderate
C-3	3	0.7	21 du/a	14 units	11 units	5 units	Moderate
C-2	11	2.4	29 du/a	68 units	55 units	27 units	Above
C-1	43	10.9	43 du/a	463 units	364 units	172 units	Lower
<i>Notes:</i> *Assumes that the sites will develop with at least one unit per lot or at an average of 80 percent maximum allowable density. Summary data rounded down by parcel. **Assumes that only 50 percent of the commercial sites will develop as mixed use with a residential component. Summary data rounded down by parcel.							

Figure H-11: Vacant and Underutilized Sites



Realistic Capacity Assumptions

In order to assess the potential for housing development in the City of Imperial Beach, it is important to understand the actual or realistic housing capacity of identified sites, whether they are vacant sites or sites that have a reasonable potential for redevelopment. For the purposes of identifying realistic capacity, it is assumed that development will achieve at least 80 percent of the maximum allowable residential density. For the smaller lots in the inventory, a minimum of one dwelling unit is assumed for each legal lot. It is also assumed that 50 percent of the commercial sites will be developed with mixed-use and include multi-family units above ground-floor commercial uses.

These assumptions are based on historical development patterns and are necessary to accommodate for a variety of site specific factors that cannot be evaluated until a development proposal is brought to the City for review. Site shape, size, access, location, developer preferences and cumulative application of development standards will result in some parcels achieving maximum allowable residential density while others will achieve less than 80 percent of maximum allowable density. A CUP is required for mixed use; however, this is not a constraint on development. The City has approved five mixed use projects since 2001, including two redevelopment projects that are currently under construction. These privately-

funded market rate mixed use projects achieved an average of 82 percent maximum allowable density.⁸ No mixed use projects were denied during this period.

As part of the City's efforts to promote mixed use development along its commercial corridors, the City commissioned a land use study to review its development standards. The study recommends providing density and height incentives to mixed use projects that include large units (with three or more bedrooms). The City intends to adopt the recommendations of the study.

Vacant Sites

As an older urban community, the City's inventory of vacant residential and commercial land is limited. Only 33 parcels (4.8 acres) zoned for residential or commercial/mixed use are undeveloped and available for future housing development. The lots are small (average <5,250 square feet) and scattered with a maximum capacity of 108 units; however, the City estimates that the realistic capacity of these sites is 62 units.

Underutilized Sites

Although the recent economic downturn has slowed all development in the City (residential and commercial), redevelopment of underutilized sites continues to be a viable option in Imperial Beach. In addition to the two mixed-use projects currently under construction, eight single-family homes have been demolished and redeveloped with 15 new single-family and duplex units since 2008. Given a limited supply of vacant land in Imperial Beach and urbanized South San Diego County, the City anticipates that increased redevelopment activities within the planning period will occur as the economy continues to recover.

The City has identified 61 parcels (14.7 acres) zoned for residential and commercial/mixed use that are underutilized and ripe for redevelopment. The underutilized properties are larger on average than the vacant sites (average >10,000 square feet); however, the largest site is approximately one acre. Although some portions of each of these sites are developed with existing commercial, manufacturing, and/or residential uses, the existing uses are of marginal economic viability, the structures are at or near the end of their useful life, and/or the existing intensity of development is substantially lower than allowed by existing zoning. Most sites are adjacent or in close proximity to each other and are appropriate for consolidation into large development projects. Potential for lot consolidation is also identified in the detailed sites inventory in Appendix C. Program 11 in the Housing Plan section of this Housing Element identifies incentives for lot consolidation. Given these existing conditions and the zoning capacity for higher density residential, the City feels these sites are the most viable redevelopment opportunities to accommodate the housing need within the planning period. These underutilized sites have the capacity to yield up to 554 new dwelling units; however, the City estimates that the realistic capacity of these sites is 212 new units.

Affordability Assumptions

The realistic capacity of the City's vacant and underutilized sites plus anticipated second dwelling units could result in 330 new dwelling units by the end of year 2020. This exceeds the City's remaining RHNA of 208 units for the 2010-2020 planning period, and the following discussion demonstrates that the City has adequate capacity to accommodate the RHNA by income category:

⁸ Specifically, redevelopment of properties located at 1120, 1126, 1146, 1150, and 1189 13th Street in the C-3 zone.

- **Lower Income Sites:** Government Code Section 65583.2(c)(3)(B) allows local governments to utilize a “default” numerical density standard for establishing adequate zoning to accommodate lower income housing. With a maximum allowable density of 43 units per acre, the C-1 (General Commercial) zone, meets the statute’s “default” density standard. Therefore, the vacant and underutilized C-1 parcels identified in Appendix C have adequate zoning to accommodate at least 180 lower income units.
- **Moderate Income Sites:** The housing market analysis in the Community Profile of this Housing Element demonstrates that moderate income households can afford to a wide range of rental options and purchase a median priced home in Imperial Beach. As such, the City assumes that sites in Appendix C zoned R-1-6000, R-3000, R-3000-D, R-2000, R-1500, C-3, and C-2 zones could accommodate at least 49 units affordable to moderate income households. Another 56 moderate income second dwelling units can be accommodated on at least 2,900 parcels zoned R-3000, R-3000-D, R-2000, and R-1500.
- **Above Moderate Income Sites:** Vacant and underutilized sites zoned C-2 (Seacoast Commercial) are located within two blocks of the beach and provide convenient access to shopping, dining, and entertainment. The proximity to such amenities increases the likelihood that these units will be offered at higher prices than most other homes in Imperial Beach. Therefore, for the purposes of this analysis, the City assumes that the C-2 sites in Appendix C could be developed with at least 45 above moderate income units.

4.1.5 Suitability of Underutilized Sites

Imperial Beach is an older urbanized community with limited development opportunities on vacant land. As such, vacant sites cannot accommodate Imperial Beach’s entire share of the regional housing need and the City relies on underutilized properties to demonstrate sufficient capacity during the planning period. This section demonstrates that the underutilized sites are suitable for redevelopment within the planning period.

All the sites identified include marginal uses such as independent auto repair shops or used car sales, small homes on large lots, small commercial offices or retail businesses that have outdated configurations and marginal operations. Nearly all of the existing structures are in either dilapidated or poor condition. The structures that are in fair condition are on lots that are highly underutilized based on the allowable zoning. Figure H-12 and Figure H-13 depict typical existing conditions on underutilized sites in the commercial and residential zones.

Figure H-12: Example Commercial Sites



Abandoned motel on a 45,300-square-foot lot in the C-1 zone (Site# 32).



Vacant commercial building on a 5,250-square-foot lot in the C-2 zone (Site# 35).



Marginal coin operated car wash on an 11,620-square-foot lot in the C-3 zone (Site# 42).



Small dwelling on an 11,400-square-foot lot in the C-1 Zone (Site# 34)

Figure H-13: Example Residential Sites



Small single family dwelling on a 4,780-square-foot lot in the R-2000 zone (Site# 43).



Marginal operating industrial use on an 8,250-square-foot lot in the R-3000-D zone (Site# 44).

Recent construction and development applications demonstrate active demand for the redevelopment in Imperial Beach. The City recently received an application to convert an existing industrial building located within the R-3000-D zone and located at 730 Basswood Ave (Site #44 depicted above) into an attached duplex. At only 8,250 square feet, this site is similar in size and shape and has similar improvements to the two commercial sites on 13th Street that are currently being redeveloped with mixed use (see Figure H-10). All three of these sites are similar to the majority of sites in Appendix C. Therefore, the City concludes that its inventory of underutilized sites is suitable for redevelopment within the planning period.

Public Services and Infrastructure Availability

As discussed in details in the Constraints section of the Housing Element, no significant public service or infrastructure constraints have been identified. Existing water delivery and

wastewater collection infrastructure is available to all properties located in the residential sites inventory and the City has adequate water and wastewater capacity to accommodate the RHNA of 254 units. All sites are adjacent to existing public roadways and are serviceable by the City's police and fire departments, as well as private companies that provide phone, cable, gas, and electric service.

4.1.6 Summary

Table H-44 summarizes the City's accommodation of the RHNA for all income groups during the 2010-2020 planning period. After accounting for development credits, anticipated second dwelling units, and realistic capacity of vacant and underutilized sites, the City has identified surplus capacity of 122 total units, including a surplus of 104 lower income and 65 moderate income units.

Income	RHNA	Credits	Remaining RHNA	Anticipated SDUs	Sites Capacity	Surplus/ Shortage
Very Low (<50% AMI)	63	3	60	0	180	+104
Low (51-80% AMI)	48	32	16			
Moderate (81%-120% AMI)	45	5	40	56	49	+65
Above Moderate (>120% AMI)	98	6	92	0	45	-47
Total	254	46	208	56	274	+122

4.2 Financial Resources for Housing

As a small city, Imperial Beach has limited access to funding sources for affordable housing activities. The following section describes the three largest housing funding sources the City of Imperial Beach can use for housing production, rehabilitation, or preservation: Balance of redevelopment set-aside funds; the Housing Choice Voucher Program; and CDBG funds.

4.2.1 Redevelopment Housing Set-Aside

Prior to dissolution in February 2012, State law required the City's redevelopment agency to set aside a minimum of 20 percent of all tax increment revenue generated from redevelopment projects for affordable housing. The "set-aside" or Lower and Moderate Income Housing Fund (LMIHF) must be used for activities that increase, improve, or preserve the supply of affordable housing. Redevelopment law required that all new or substantially rehabilitated housing units developed or otherwise assisted with the Agency's set aside funds must remain affordable to the targeted income group for at least 55 years for rentals and 45 years for ownership housing.

In February 2012, the City formed a Housing Authority to oversee the remaining balance of LMIHF. Members of the City Council comprise the Authority's decision-making body. As of March 2012, the Imperial Beach Housing Authority has a balance of \$5,674,640 in the LMIHF. The majority of the LMIHF has been committed to American Legion, the 30-unit project under construction. Other uses of the funds include monitoring of various affordable housing projects (Hemlock and Calla; Beachwind), Housing Element update, Clean and Green, the Habitat for Humanity project. No new LMIHF will be generated with the dissolution of the redevelopment agency.

4.2.2 Housing Choice Voucher Program

The Housing Choice Voucher Program is a federal program that provides rental assistance to very low income persons in need of affordable housing. The program offers a voucher to income-qualified tenants that pays the difference between the payment standard (an exception to fair market rent) and what a tenant can afford to pay (e.g. 30 percent of their income). A voucher allows a tenant to choose housing that may cost above the payment standard, with the tenant paying the extra cost. The San Diego County Department of Housing and Community Development (County HCD) administers the Housing Choice Voucher Program in Imperial Beach. Approximately 400 households in Imperial Beach receive assistance through the Housing Choice Voucher Program.

4.2.3 Community Development Block Grant (CDBG) Funds

The CDBG program provides funds for a range of community development activities. The program is flexible in that the funds can be used for a range of activities. The eligible activities include, but are not limited to: acquisition and/or disposition of real estate or property, public facilities and improvements, relocation, rehabilitation and construction (under certain limitations) of housing, homeownership assistance, and also clearance activities. CDBG funds can be used for a wide array of activities, including:

- Housing rehabilitation;
- Downpayment and other homeownership assistance;
- Lead-based paint screening and abatement;
- Acquisition of buildings and land;
- Construction or rehabilitation of public facilities and infrastructure;
- Removal or architectural barriers;
- Public services for low-income persons and persons with special needs;
- Rehabilitation of commercial or industrial buildings; and
- Loans and grants for businesses that provide employment for low-income persons.

The City of Imperial Beach does not qualify as an entitlement jurisdiction to receive annual CDBG allocations directly from HUD.⁹ The County provides community development improvement CDBG dollars to the unincorporated areas within the County and the cities of Coronado, Del Mar, Imperial Beach, Lemon Grove, Poway and Solana Beach for a wide variety of housing and community development activities. The dollars are allocated to the cities based on a formula that accounts for population levels, overcrowding and poverty. Annually, the City receives approximately \$125,000 in CDBG funds through the County. Given the small total allocation, the City has historically allocated CDBG funding to support capital improvements in low and moderate income neighborhoods.

⁹ A jurisdiction must have a population of 50,000 or over to qualify as an entitlement jurisdiction to receive annual funding from HUD directly.

4.3 Administrative Resources

Described below are public agencies and non-profit organizations that have been involved or are interested in housing activities in Imperial Beach. These agencies play important roles in meeting the housing needs of the community. In particular, these agencies and organizations have been or are currently involved in the improvement of the housing stock, expansion of affordable housing opportunities, preservation of existing affordable housing, and/or provision of housing assistance to households in need in Imperial Beach.

4.3.1 San Diego County HCD

San Diego County HCD is a public agency that provides subsidized housing and other housing-related services to lower and moderate income individuals and families. In addition to conventional public housing within San Diego County, the Department administers several rental assistance programs such as the Housing Choice Voucher Program, Family Self-Sufficiency, Shelter + Care, and Housing Opportunities for Persons with AIDS.

County HCD also operates a range of housing programs using HUD and State funds. As participating jurisdiction, Imperial Beach residents are eligible to receive assistance through the following programs:

- Home Repair Loan/Grant Program
- Downpayment and Closing Cost Program
- Mortgage Credit Certificate Program

4.3.2 Private Developers and Service Providers

Private developers and service providers are available to assist with the provision of housing and housing-related services within Imperial Beach. These private entities can be for-profit and non-profit ventures. The following affordable housing developers have expressed interest in developing and/or preserving affordable housing in San Diego County:

- Affordable Housing Applications (AHA Housing)
- Affordable Housing People
- Alpha Project
- American Legion
- Bridge Housing Corporation
- Casa Familiar
- Catholic Charities
- Chicano Federation of San Diego County
- City of San Diego Housing Commission
- Community Housing Group
- Community Housing Works
- County of San Diego Housing and Community Development Department
- Episcopal Community Services
- Habitat for Humanity
- Housing Development Partners of San Diego
- Imperial Beach Gardens
- Jamboree Housing

- Lutheran Social Services
- MAAC Project
- San Diego Community Land Trust
- San Diego County Housing and Community Development Department
- San Diego Interfaith Housing Federation
- South Bay Community Services
- St. James Lutheran Senior Housing
- Vietnam Veterans of San Diego

The City will continue to work with these and other qualified housing developers and service providers to create affordable housing through new construction, acquisition/rehabilitation, and preservation.

4.4 Opportunities for Energy Conservation

Construction of energy efficient buildings can add to the production costs of ownership and rental housing. Over time, however, housing with energy conservation features should reduce occupancy costs as the consumption of fuel and electricity is decreased. This can result in monthly housing costs that are equal to or less than what they otherwise would have been had no energy conservation devices been incorporated in the new residential buildings. This section provides an overview of opportunities for energy conservation during the 2013 to 2021 Housing Element planning period.

4.4.1 State Regulations

Title 24 of the California Administrative Code establishes energy conservation standards that must be applied to all new residential buildings. The regulations specify energy saving design for walls, ceilings and floor installations, as well as heating and cooling equipment and systems, gas cooling devices, conservation standards and the use of non-depleting energy sources, such as solar energy or wind power. Compliance with the energy standards is achieved by satisfying certain conservation requirements and an energy budget. Among the alternative ways to meeting the energy standards are the following:

- **Alternative 1:** The passive solar approach which requires proper solar orientation, appropriate levels of thermal mass, south facing windows, and moderate insulation levels.
- **Alternative 2:** Generally requires higher levels of insulation than Alternative 1, but has no thermal mass or window orientation requirements.
- **Alternative 3:** Also is without passive solar design but requires active solar water heating in exchange for less stringent insulation and/or glazing requirements.

Residential developers must comply with these standards while localities are responsible for enforcing the energy conservation regulations.

4.4.2 State and Federal Programs

The California Department of Community Services and Development in partnership with the network of local community services agencies that assist lower-income households, administers the Low Income Home Energy Assistance Program (LIHEAP) and Energy Low Income Weatherization Assistance Program (DOE-LIWAP). LIHEAP provides financial assistance to lower income households to offset the costs of heating and/or cooling their residences. DOE-LIWAP provides installation and weatherization measures that increase energy efficiency of existing residential and multi-family dwellings occupied by lower-income persons. Eligible weatherization services include a wide variety of energy efficiency measures that encompass the building envelope, its heating and cooling systems, its electrical system, and electricity consuming appliances.

4.4.3 Local Measures

The City recently adopted a Green Building Code, which introduces sustainable construction practices in planning, design, energy, resource and water efficiency, material conservation and environmental quality. Furthermore, the City allows mixed-use development in commercial zones and within residential zones with the Mixed Use Overlay districts. Policies and programs of this Housing Element will encourage and facilitate the redevelopment of underutilized commercial sites within the City's primary transit corridors. Mixed-use residential development that is both pedestrian- and transit-oriented conserves energy by reducing the number of vehicular trips and efficient use of land and construction materials.

The City's Clean and Green Program provides qualified very low, low and moderate income single-family homeowners with grants for energy efficient and water conservation improvements. Also, an eligible expense in the program is the installation of accessibility improvements.

4.4.4 Private Sector Programs

The following private sector energy conservation programs are available to housing developers and Imperial Beach residents:

- **California Alternative Rates for Energy (CARE):** Lower-income customers enrolled in the CARE program receive a 20 percent discount on their electric and natural gas bills and are not billed in higher rate tiers that were created for San Diego Gas & Electric (SDG&E). CARE is funded through a rate surcharge paid by all other utility customers.
- **Energy Assistance Program Rate (EAPR):** Includes a one-year electric rate reduction home energy audit, free compact fluorescent lights, and replacement of inefficient refrigerators. Income qualification and enrollment by Red Cross.
- **Family Electric Rate Assistance Program (FERA):** This program was developed for families whose household income slightly exceeds the threshold for assistance in other energy program allowances. Qualifying households have some of their electricity usage billed at a lower rate.
- **Low Income Energy Efficiency Program (LIEE):** The LIEE program provides no-cost weatherization services to lower-income households who meet the CARE guidelines.

Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelop repairs that reduce air infiltration.

- **Salvation Family Emergency Services:** Utility assistance and energy conservation counseling is available from the Salvation Army.
- **Residential Energy Standards Training:** SDG&E offers seminars on energy efficiency compliance best practices. Architects, designers, builders, engineers, energy consultants, HVAC contractors, building department inspectors, and plan checkers are encouraged to learn about new technologies that improve energy efficiency and reduce the cost of complying with evolving State energy standards.
- **Lighting Turn-In Program:** Through this program, SDG&E replaces resident's incandescent bulbs with more energy-efficient compact fluorescent bulbs (CFLs) free of charge. Residents can access the program via community events that are held throughout SDG&E's service area and coordinated through an extensive network of community organizations and government agencies.
- **Rebate Program:** SDG&E offers rebates for single-family and multifamily dwelling units for certain improvements in their units that lead to greater energy efficiency. These improvements include purchase and installation of insulation, energy efficient appliances, and the replacement of old light bulbs with Energy Star light bulbs.

Section 5: Housing Plan

Previous sections of the Housing Element established the housing needs, constraints, opportunities and resources in the City of Imperial Beach. The Housing Plan presented in this section sets forth the City's goals, policies and programs to address Imperial Beach's identified housing needs:

- **Goals** are the results that the City desires to achieve over the housing planning period. They are general expressions of values or preferred outcomes, and therefore, are abstract in nature and may not be fully attained. The goals are the basis for City policies and actions during this period.
- **Policies** are specific statements that will guide decision-making. Policies serve as the directives to developers, builders, service providers, decision makers and others who will initiate or review new development projects or seek to provide housing-related services in Imperial Beach. Some policies stand alone as directives, but others require that additional actions be taken. These additional actions are listed under "programs" below.
- **Programs** are the core of the City's housing strategy. Programs translate goals and policies into actions. These include on-going programs, procedural changes, zoning ordinance changes, and other actions that implement the housing policies and help achieve housing goals. Each program identifies the responsible agency, funding source, timeframe for implementation, and specific objectives.

5.1 Review of Past Accomplishments

Government Code Section 65588(a) requires each jurisdiction to review its housing element as frequently as appropriate to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and
- The progress of the city, county or city and county in implementation of the housing element.

This section documents the City's achievements under the 2005-2010 Housing Element with respect to the actions and objectives contained therein. The City's efforts and accomplishments under the 2005-2010 (extended by SB 375 through April 2013) Housing Element are summarized in Appendix B. The Appendix also contains recommendations for program retention, revision, deletion or addition to address current and projected needs and State requirements between 2013 and 2021.

5.2 Goals and Policies

This section of the Housing Element contains the goals and policies the City of Imperial Beach intends to implement to address a number of important housing-related issues. The following major issue areas are addressed by the goals and policies of this Element:

- Provide a broad range of housing types to meet the needs of existing and future residents;
- Identify and promote adequate sites for future residential development;
- Increase opportunities for homeownership;
- Ensure that existing housing is maintained and preserved; and
- Promote equal housing opportunity for all.

Each issue area and the supporting goals and policies are identified and discussed in the following section.

5.2.1 Range of Housing Types

Continuing to provide a balanced inventory of housing in terms of types (e.g., single-family, duplexes, apartments, and condominiums), cost and style will allow the City to fulfill a variety of housing needs. In addition, providing regulatory and available financial assistance will be essential to support the production of affordable housing. Maintaining diversity in housing choice and cost will allow Imperial Beach residents an opportunity to find housing meeting their individual and household needs, regardless of age, disability, family type, or income.

Goa 1: Meet the housing needs of existing and future needs of the community.

Policy 1.1: Accommodate a variety of housing types to meet the needs of all residents.

Policy 1.2: Facilitate development of affordable housing through use of financial and/or regulatory incentives when feasible.

Policy 1.3: Encourage the development of residential units and the provision of related services for special needs groups, including the elderly, large families, single parents, persons with disabilities, and the homeless.

Policy 1.4: Maintain streamlined procedures for processing new residential development applications.

Policy 1.5: Advocate for increased funding to expand federal and state housing assistance programs for lower and moderate income households, including extremely low income households.

Policy 1.6: Encourage the inclusion of housing affordable to extremely low income households when reviewing proposals for new affordable housing developments.

Policy 1.7: Periodically review City regulations, ordinances, procedures, and fees to ensure they do not unduly constrain the production of housing.

Policy 1.8: Eliminate zoning and other regulatory barriers to the placement and operation of housing facilities for the homeless and special needs populations in appropriate locations throughout the City.

5.2.2 Adequate Residential Sites

Imperial Beach is a built-out community with a limited amount of remaining vacant residential land. To facilitate new residential development, the City plays an important role in both assisting in the identification and promotion of potential sites for future development.

Goal 2: Provide adequate housing sites through appropriate land use designations, zoning districts, and residential development standards to accommodate the City's share of the regional housing need.

Policy 2.1: Maintain an up-to-date residential sites inventory and provide to interested developers in conjunction with information on available development incentives.

Policy 2.2: Promote mixed-use development and second dwelling units in appropriate districts to facilitate smart growth and reduction in automobile trips, vehicle miles traveled, and associated energy consumption.

Policy 2.3: Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

Policy 2.4: Support the assembly of small vacant or underutilized parcels as a means to increase the feasibility of infill development.

5.2.3 Promote Homeownership

Increasing homeownership in Imperial Beach can contribute to improved property maintenance and stabilization of neighborhoods. In addition, by assisting renters to move into adequately sized ownership units, the City can address overcrowding in its rental housing stock.

Goal 3: Expand homeownership opportunities to increase the proportion of owner-occupied housing units.

Policy 3.1: Encourage the development of affordable homeownership housing for first-time homebuyers.

Policy 3.2: Continue to promote countywide programs that assist qualified buyers with the purchase of a home.

Policy 3.3: Promote home ownership opportunities and support current homeowners in retaining their homeownership status.

Policy 3.4: Advocate for the expansion of existing and creation of new programs to support a variety of owner-occupied housing.

5.2.4 Maintain and Preserve Existing Housing

Housing and neighborhood conservation is an important component of maintaining and improving the quality of life for residents. In general, housing over 30 years old usually is in need of some major rehabilitation, such as a new roof, repair of termite damage, foundation work, plumbing, etc. With approximately 75 percent of Imperial Beach's housing stock built prior to 1980, preventive maintenance is essential to ward off widespread housing deterioration. Imperial Beach must continually assess potential neighborhood and community impacts associated with aging housing, infrastructure and community facilities. Maintenance and rehabilitation efforts contribute to the preservation and enhancement of neighborhoods and the individual housing units within these neighborhoods.

Goal 4: Maintain, preserve, and enhance existing housing to build stronger and more vibrant residential neighborhoods.

Policy 4.1: Encourage the preservation, rehabilitation or, if necessary, replacement of single-family and multi-family dwelling units, in order to improve and enhance existing neighborhoods.

Policy 4.2: Facilitate preservation of housing affordable to lower and moderate income households.

Policy 4.3: Alleviate unit overcrowding by maintaining development standards and building codes that permit owners to remodel homes and add living area, bedrooms, and bathrooms.

Policy 4.4: Monitor housing and neighborhood conditions and trends for early signs of deterioration.

Policy 4.5: Encourage resident involvement in identifying and addressing the maintenance of housing in their neighborhood.

Policy 4.6: Enforce building codes and property maintenance standards.

Policy 4.7: Monitor, protect, and preserve affordable housing within the coastal zone.

Policy 4.8: Invest in street, curb, gutter, drainage, and utility improvements in declining or deteriorating neighborhoods to encourage increased private market investment and redevelopment.

5.2.5 Promote Equal Housing Opportunities

The City seeks to expand the range of housing opportunities provided in Imperial Beach, including housing for seniors on fixed incomes, lower and moderate income residents (including extremely low income households), the disabled, large families, female-headed households with children, and the homeless. In order to make adequate provision for the housing needs of all segments of the community, the City must ensure equal and fair housing opportunities are available to all residents.

GOAL 5: Ensure that all residents have equal housing opportunities, regardless of race, color, ancestry, national origin, religion, age, gender/gender identity, marital status, familial status, disability/medical conditions, source of income, sexual orientation, or any other arbitrary factor.

Policy 5.1: Affirmatively further fair housing and promote equal housing opportunities for persons of all economic segments of the community.

Policy 5.2: Promote housing along with supportive services to meet the special housing needs of seniors, homeless individuals and families, and the disabled.

Policy 5.3: Encourage the provision of housing to meet the needs of families of all sizes.

Policy 5.4: Facilitate increased participation among traditionally underrepresented groups in the public decision making process.

Policy 5.5: Provide outreach and education for the broader community of residents, residential property owners and operators regarding fair housing practices and requirements.

5.3 Housing Programs

The goals and policies outlined in the prior section address Imperial Beach's identified housing needs, and are implemented through a series of housing programs offered primarily through the City's Community Development Department. Housing programs define the specific actions the City will undertake to achieve the stated goals and policies with the eight-year (2013-2021) planning period. The City's housing programs for addressing community housing needs is described according to the following five issue areas.

- Housing Conservation and Improvement
- Housing Assistance
- Provision of Adequate Housing Sites
- Removal of Governmental Constraints
- Promotion of Equal Housing Opportunity

The housing programs presented on the following pages eliminate, revise, or consolidate many of the programs identified in the 2005-2010 Housing Element. New programs have been added to address the City's unmet housing needs or to respond to changes in State laws. The responsible agency, funding source(s), and eight-year objectives is also identified for each program.

5.3.1 Housing Conservation and Improvement

Conserving and improving the housing stock is an important goal for the City of Imperial Beach. Approximately 75 percent of housing units in Imperial Beach were constructed prior to 1980 and are therefore more likely to have rehabilitation needs than newer housing units. Due to the advanced age of the City's housing stock, programs to address building conditions will facilitate

the upkeep of housing for the benefit of resident health. Programs to monitor, preserve, and improve the existing supply of affordable housing can also help accomplish the City's goal to build stronger and more vibrant residential neighborhoods.

Program 1: Home Repair Program for Owner-Occupied Property

Lower income residents of Imperial Beach are eligible to receive loans and grants provided by the County of San Diego, Department of Housing and Community Development, for the repair of owner-occupied single-family homes and mobilehomes. Deferred loans of up to \$25,000 for single-family homes and up to \$8,000 for mobilehomes are available to eligible homeowners. Monthly payments are not required on these loans; however, three percent interest is calculated annually on the unpaid principal. The total amount borrowed plus interest must be repaid when the property is sold, the recipient moves, or within 30 years, whichever occurs first. Grants of up to \$12,000 are also available to qualifying mobilehome owners.

- Responsible Agencies:** • County of San Diego, Department of Housing and Community Development
- Financing:** CDBG and HOME
- 2013-2021 Objectives and Timeframe:**
 - Continue to promote the County's Home Repair Program for Owner-Occupied Property to residents and property owners through dissemination of brochures at public counters, providing information on City website, and referring residents and property owners to the County of San Diego, Department of Community Development.
 - Ongoing implementation and annual monitoring and reporting throughout the planning period.

Program 2: Neighborhood Improvements

The City applies for and receives an annual allocation of CDBG funds from the County of San Diego, Department of Housing and Community Development, through the San Diego Urban County Program. These funds are used to install and upgrade public facilities (streets, curb, gutter, drainage facilities, and utilities) in lower income neighborhoods. The infrastructure improvements encourage increased private market investment in declining or deteriorating neighborhoods.

- Responsible Agencies:** • City of Imperial Beach Community Development Department
- County of San Diego, Department of Housing and Community Development
- Financing:** CDBG
- 2013-2021 Objectives and Timeframe:**
 - Annually apply to the San Diego Urban County for CDBG funds. Complete 16 infrastructure improvement projects that serve lower income neighborhoods by 2021.

Program 3: Clean and Green

The Clean and Green program provides qualified very low, low, and moderate income single-family homeowners with grants up to \$30,000 for energy and water efficiency

enhancements made to their home. Installation of accessibility improvements is also an eligible expense under the program.

Responsible Agencies: • City of Imperial Beach Community Development Department

Financing: Affordable Housing Bond Fund (contingent upon successful retention for this use by the Imperial Beach Redevelopment Agency Successor Agency)

- 2013-2021 Objectives and Timeframe:**
- Publicize City program on website and at public counters.
 - Assist 30 lower and 30 moderate income households by 2021.

Program 4: Conservation of Existing and Future Affordable Units

Between January 1, 2013, and December 31, 2022, one federally assisted multi-family apartment development with 99 units is at-risk of converting to market rate housing. The City will work with the property owner of the St. James Plaza development, interested groups, and the State and federal governments to conserve its affordable housing stock.

Responsible Agencies:

- City of Imperial Beach
- U.S. Department of Housing and Urban Development (HUD)
- County of San Diego County, Department of Housing and Community Development

Financing: HUD Section 8 Allocation; Housing Authority Special Housing Choice Vouchers

- 2013-2021 Objectives and Timeframe:**
- *Monitor Units at Risk:* Ongoing monitoring of the status of units within the St. James Plaza development.
 - *Tenant Education:* The California legislature extended the noticing requirement of at-risk units opting out of low-income use restrictions to one year. Should a property owner pursue conversion of the units to market rate, the City will ensure that tenants were properly noticed and informed of their rights and that they are eligible to receive Housing Choice Vouchers that would enable them to stay in their units.
 - *Assist Tenants of Existing Rent Restricted Units to Obtain Housing Choice Voucher Assistance:* Six months prior to conversion, the City will assist tenants of "at risk" units to obtain Housing Choice Vouchers through the County of San Diego County, Department of Housing and Community Development.

Program 5: Coastal Zone Monitoring

All housing in Imperial Beach is located within or near the Coastal Zone. In general, existing affordable housing that is located near the ocean are at a greater risk of cost inflation or redevelopment with uses intended to serve above moderate income households than property located further away from the ocean. To ensure the affordable housing stock within

the coastal zone is being protected and provided as required by Government Code Section 65590, the City will:

- Maintain records of existing housing units serving lower and moderate income households in the Coastal Zone areas;
- Track and maintain new construction, conversion and demolition of affordable housing in the Coastal Zone areas, including new construction of affordable housing and replacement affordable housing in or within three miles of the Coastal Zone areas; and
- Enforce applicable affordability covenants.

Responsible Agencies: • City of Imperial Beach Community Development Department

Financing: None required

- 2013-2021 Objectives and Timeframe:**
- Begin maintaining records in 2013.
 - Ongoing tracking of new construction, demolition, and conversion of affordable units within the Coastal Zone.

5.3.2 Housing Assistance

The City seeks to assist the real estate market provide decent housing and a suitable living environment for all Imperial Beach residents. This Housing Element has identified a specific need to expand rental and ownership opportunities for lower and moderate income households. The following programs provide assistance to developers of new affordable housing development or expand housing choices for income-qualified residents of Imperial Beach.

Program 6: Affordable Housing Incentives

To encourage and facilitate affordable housing development in Imperial Beach, including housing for extremely low income households, the City will provide the following incentives to private developers along with information regarding the availability of funding through federal and State housing assistance:

- Provide technical assistance to developers regarding City mixed use zoning and density bonus incentives;
- Distribute the Affordable Housing Booklet to affordable housing developers;
- Provide fee underwriting, fee deferral, and/or permit fast-tracking for projects that include housing affordable to lower income households, prioritizing projects that include units affordable to extremely low income households;
- As needed to enhance project feasibility, provide relaxed development standards for mixed use development projects that include an affordable housing component;
- Encourage well-planned and designed mixed use development by allowing higher building intensities, reduced parking requirements, reduced set-back and yard requirements, increased building height, and greater floor area ratios; and
- Develop appropriate incentives to encourage the provision of affordable units with three or more bedrooms.

Responsible Agencies: • City of Imperial Beach Community Development Department

Financing: None required

2013-2021 Objectives and Timeframe:

- Outreach to affordable housing developers annually to explore opportunities for affordable housing. Outreach should include developers with experience in development projects that include units affordable to extremely low income households.
- Continue to provide regulatory and technical assistance to affordable housing developers.
- Annually explore various sources (e.g., HCD and HUD) for funding opportunities, including those available for housing for extremely low income households. Apply for or support applications for affordable housing funds for projects or programs that are consistent with the goals and objectives of the Housing Element.

Program 7: Housing Choice Vouchers

The County of San Diego, Department of Housing and Community Development administers the Housing Choice Voucher program on behalf of the City of Imperial Beach. The Housing Choice Voucher program extends rental subsidies to very low income households, including families, seniors, and persons with disabilities. The program offers a voucher that pays the difference between the current fair market rent (FMR) as established by the U.S. Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e. 30 percent of household income). The voucher allows a tenant to choose housing that costs above the payment standard, providing the tenant pays the extra cost. A portion of the Housing Choice Vouchers is reserved for households with extremely low income.

Responsible Agencies:

- County of San Diego, Department of Community Development
- City of Imperial Beach Community Development Department

Financing:

HUD Section 8 allocation

2013-2021 Objectives and Timeframe:

- Continue to promote the Housing Choice Voucher program to residents and property owners through dissemination of brochures at public counters, providing information on the City's web-site, and referring residents and property owners to the County of San Diego, Department of Community Development.
- Encourage property owners to accept Housing Choice Vouchers and work to maintain at least the current level of assistance (415 voucher holders) in Imperial Beach.

Program 8: First-Time Homebuyer Programs

The City does not directly offer first-time homebuyers assistance programs due to limited funding available. However, Imperial Beach residents are eligible to participate in County and State programs, including the Down payment and Closing Cost Assistance (DCCA) program and Mortgage Credit Certificate (MCC) program offered by the County, and California Homebuyer's Down payment Assistance Program (CHDAP) offered by the State:

- **DCCA** offers low-interest deferred payment loans of up to \$35,000 or 33 percent of the purchase price, whichever is lower, for lower-income first-time homebuyers.

DCCA loan funds may be used to pay down payment and closing costs of a qualifying single-family home, condominium, townhouse, or manufactured home on a permanent foundation.

- **MCC** allows qualified first-time homebuyers to reduce their federal income tax by up to 20 percent of the annual interest paid on a mortgage loan. With less being paid in taxes, the homebuyer's net earnings increase, enabling him/her to more easily qualify for a mortgage loan. The MCC may only be used to purchase single-family detached homes, condominiums, townhouses, or owner-occupied duplexes.
- **CHDAP** provides a deferred-payment junior loan, up to three percent of the purchase price, or appraised value, whichever is less, to be used for their down payment and/or closing costs.

Responsible Agencies:

- County of San Diego, Department of Housing and Community Development
- California Housing Finance Agency
- City of Imperial Beach Community Development Department

Financing: HOME and other County and State funds

2013-2021 Objectives and Timeframe:

- Continue to promote the DCCA, MCC, and CHDAP programs to residents through dissemination of brochures at public counters, providing information on City website
- Refer residents to the County of San Diego, Department of Community Development, and the California Housing Finance Agency for assistance.

5.3.3 Provision of Adequate Housing Sites

Meeting the housing needs of all segments of the community requires the provision of adequate sites for all types, size and prices of housing. The City's General Plan and Zoning Ordinance determine where housing may locate, thereby affecting the supply of land available for residential development.

Program 9: Residential Sites Inventory

Imperial Beach is almost entirely developed and few vacant residentially zoned sites remain in the City. Recent and future residential development relies primarily on the redevelopment of underutilized properties, particularly along the City's major corridors where mixed use development is permitted. Given the City's small size, the Imperial Beach is able to monitor the status of vacant and underutilized sites and will continue to provide sites information to interested developers.

Responsible Agencies:

- City of Imperial Beach Community Development Department

Financing: None required

2013-2021 Objectives and Timeframe:

- Monitor status of vacant and underutilized sites.
- Provide information on available sites and development incentives to interested developers and property owners.

Program 10: Mixed Use Development Sites

Recognizing the need to create additional capacity to accommodate the community's housing needs while also expanding Imperial Beach's commercial base, the City retained a consultant to review rezoning options. The City implemented the following study recommendations by amending the General Plan, Local Coastal Plan, and Zoning Ordinance to facilitate redevelopment of underutilized lower-density residential properties with a mix of high density residential uses above ground-floor commercial uses:

- Redefine the existing base zones and Mixed Use Overlay zones:
 - The areas currently governed by C-1 or R-1500/MU-1 within the Palm Avenue study area will be redefined as "C/MU-1: General Commercial and Mixed Use";
 - The areas currently governed by C-2 or R-1500/MU-2 within the Seacoast Drive and Old Palm Avenue study area will be redefined as "C/MU-2: Seacoast Commercial and Mixed Use"; and
 - The areas currently governed by C-3 within the 13th Street Corridor study area will be redefined as "C/MU-3: Neighborhood Commercial and Mixed Use."
- Remove the CUP requirement for mixed use projects.
- Allow Live/Work units by right within the C/MU districts.
- Allow shared parking within 1,000 feet within a proposed mixed use development current 500 feet.
- Reduce parking requirements:
 - Within the C/MU zones, vertical mixed-use projects will be eligible for a 25 percent reduction in overall parking requirement;
 - Parking requirements will be waived for commercial uses less than 1,000 square feet; and
 - An additional reduction may be granted with approval of a shared parking plan.
- Simplify the parking ratios for commercial uses. Instead of varying standards, the City will require one space per 500 SF of commercial use proposed within the C/MU-1 and C/MU-3 zones and only one space per 1,000 SF of commercial use proposed within the C/MU-2 zone.

The City adopted the Zoning Ordinance amendment on August 15, 2012.

- | | |
|--|--|
| Responsible Agencies: | • City of Imperial Beach Community Development Department |
| Financing: | None required |
| 2013-2021 Objectives and Timeframe: | <ul style="list-style-type: none">• Pursue Local Coastal Plan amendment certification by the Coastal Commission in 2012-2013.• Promote mixed use development opportunities to developers and property owners. |

5.3.4 Removal of Governmental Constraints

Under State law, the Housing Element must address, and where legally possible, remove governmental constraints affecting the maintenance, improvement, and development of housing. The following programs are designed to mitigate government constraints on residential development and facilitate development of housing affordable to lower and moderate income households, including seniors, persons with disabilities, large families, single-parents, and homeless individuals and families.

Program 11: Lot Consolidation Program

Most vacant and underutilized sites within the City are relatively small legal lots under half an acre in size. Although consolidation of lots is not prohibited, Section 19.42.070 of the Municipal Code limits the potential density on a combined lot within residential base zones to the maximum yield that would have occurred on each individual lot. This program will eliminate this restriction and include incentives to encourage the owner-initiated merger or consolidation of contiguous properties. The intent of these incentives is to achieve orderly development, improve pedestrian activity, and implement the goals, policies, and objectives of the Housing Element. The following incentives may be considered at the discretion of the City Council:

- **Parking Reduction:** Required parking may be reduced up to a maximum of 20 percent, subject to finding that adequate parking will be available to serve the subject project; and
- **Alternative Parking:** Tandem, shared, and off-site parking options may be allowed, subject to finding that adequate parking will be available to serve the project.
- **Signage Bonus:** Area of permitted signs within mixed use zones may be increased by a maximum of 10 percent, subject to finding that the increased size of signs on one parcel will not adversely affect the visibility of signs on adjacent parcels; and
- **Graduated Density:** A graduated density bonus may be granted for lot consolidation (e.g., eight parcels consolidated to achieve a lot greater than two acres in size would be eligible for a larger density bonus when compared to consolidation of four parcels to achieve a one acre lot.).

The City will advertise the lot consolidation provisions to existing property owners and prospective mixed-use and affordable housing developers. Advertisement actions may include preparation and distribution of a brochure with information about program incentives and an invitation to attend a working session to discuss opportunities for lot consolidation and mixed use residential development, including affordable housing development.

Responsible Agencies: • City of Imperial Beach Community Development Department

Financing: None required

- 2013-2021 Objectives and Timeframe:**
- Amend the Zoning Ordinance to eliminate the existing lot consolidation restrictions within residential base zones and add incentives within one year of adoption of the Housing Element.
 - Promote the program through dissemination of brochures at public counters and providing information on City website.

Program 12: Density Bonus Ordinance

Density bonuses, together with the incentives and/or concessions, can result in a lower average cost of land per dwelling unit thereby making the provision of affordable housing more feasible. SB 1818 (enacted 2005) and SB 435 (enacted 2006) changed the requirements of State law regarding the mandatory provision of density bonuses, incentives and concessions to affordable housing developers that meet certain criteria. A density

bonus up to 35 percent over the otherwise maximum allowable residential density under the applicable zoning district is available to developers who provide affordable housing as part of their projects. Developers of affordable housing are also entitled to at least one concession or incentive. The City will update its density bonus ordinance to comply with current State law. The revised density bonus ordinance will specify the types of regulatory concessions and incentives to be offered. Examples of concessions and incentives that could be offered include, but are not limited to, reductions in the amount of required on-site parking, fee reductions, expedited permit processing, and modified or waived development standards.

Responsible Agencies: • City of Imperial Beach Community Development Department

Financing: None required

- 2013-2021 Objectives and Timeframe:**
- Revise the Zoning Ordinance to update density bonus provisions consistent with State law within one year of adoption of the Housing Element.
 - Promote the use of density bonus incentives and provide technical assistance to developers in utilizing density bonus for maximize feasibility and meet local housing needs.

Program 13: Housing for Homeless, Special Needs, and Extremely Low Income Households

The City will amend the Zoning Ordinance to address the provision of housing opportunities for the homeless and those with special needs:

- **Manufactured Homes:** The Zoning Ordinance will be amended to permit manufactured homes installed on permanent foundation meeting State and national standards where single-family homes are otherwise permitted.
- **Transitional and Supportive Housing:** The Zoning Ordinance will be amended to specifically define transitional/supportive housing. Transitional housing pursuant to Health and Safety Code Section 50801(i) will be permitted in all zones where housing is permitted and subject to the same development standards as the same type of housing in that zone. Supportive housing pursuant to Health and Safety Code Section 50675.14(a)(B)(2) will be permitted in all zones where housing is permitted and subject to the same development standards as the same type of housing in that zone.
- **Single-Room Occupancy Units:** The Zoning Ordinance will be amended to facilitate and encourage the provision of SROs, consistent with State law. SROs will require approval of a CUP in the C-1 zone in conjunction with other multi-family housing or mixed use developments. Criteria that would be used to review CUP applications for SROs pertain to performance standards and are not specific to the proposed use. Potential conditions for approval of these facilities may include hours of operation, security, loading requirements, and management. Conditions would be similar to those for other similar uses in the same zones and would not serve to constrain the development of such facilities.

- **Reasonable Accommodation for Persons with Disabilities:** 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) to allow disabled persons an equal opportunity to use and enjoy a dwelling. The City will amend its Zoning Ordinance to establish a ministerial process for requesting and grant reasonable accommodations in the application of the Zoning regulations for persons with disabilities. Requests for reasonable accommodation will be reviewed and decided by the Community Development Director. The City will place information regarding procedures for requesting reasonable accommodation at public counters and on the City’s website. The City will also continue to monitor its development codes and procedures to ensure that no conditions exist to unduly constrain the development of housing for persons with disabilities. When constraints are identified, the City will work to mitigate or eliminate such constraints.
- **Senior Housing:** The Zoning Ordinance currently defines “senior housing development” as a residential project that may exceed the maximum density permitted for families in the zone in which it is located and which is established and maintained for the exclusive use of low-income or moderate-income senior residents. This definition is inconsistent with the Government Code. The City will revise its definition to be consistent with California Civil Code Section 51.3.
- **Employee Housing:** However the City will amend the Zoning Ordinance to comply with Section 17021.5 of the State Health and Safety Code regarding employee housing. Any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation for the purposes of this section of the Health and Safety Code.

Responsible Agencies: • City of Imperial Beach Community Development Department
Financing: None required

2013-2021 Objectives and Timeframe: • Revise the Zoning Ordinance within one year of adoption of the Housing Element to address housing for the homeless and special needs groups.

5.3.5 Promotion of Equal Housing Opportunity

To adequately meet the housing needs of all segments of the community, the Housing Plan must promote housing opportunities for all people.

Program 14: Fair Housing Program

Fair housing is defined as a condition in which individuals of similar income levels in the same housing market have a like range of choice available to them regardless of race, color, ancestry, national origin, religion, gender/gender identity, sexual orientation, disability/medical condition, marital status, familial status, or any other arbitrary factor. The City participates in the County of San Diego Fair Housing Program for fair housing outreach and education, as well as tenant/landlord dispute resolution. The program will be advertised through placement of fair housing services brochure at public counters, local library, and on City website. The City will continue to refer fair housing complaints to appropriate agencies.

- Responsible Agencies:**
- County of San Diego, Department of Housing and Community Development
 - City of Imperial Beach Community Development Department
- Financing:** Urban County CDBG allocation
- 2013-2021 Objectives and Timeframe:**
- Continue to participate in the County's Fair Housing Program as a fair housing service provider for fair housing and tenant/landlord dispute resolution services.
 - Continue to disseminate fair housing information and referring complaints to appropriate agencies.
 - Continue to participate in the Analysis of Impediments to Fair Housing Choice update due in 2016.

5.4 Quantified Objectives

The City of Imperial Beach has established the following quantified objectives for the 2013-2021 Housing Element:

Income Group	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA for 2010-2020)	30	33	48	45	98	254
Rehabilitation (Clean and Green)	5	5	20	30	---	60
Housing Assistance (Housing Choice Voucher)	215	200	---	---	---	415
Housing Conservation (At-Risk Housing)	45	44	---	---	---	99

Appendix A: Community Outreach

A.1 Outreach List

1. Sean Wherley, Policy Director
San Diego Housing Federation
110 West C Street, Suite 1811
San Diego, CA 92101
sean@housingsandiego.org
2. San Diego County Housing and Community Development Department
3989 Ruffin Road
San Diego, CA 92123
maria.cavarlez@sdcounty.ca.gov
3. Debbie Ruane, Senior Vice President, Real Estate Department
City of San Diego Housing Commission
1122 Broadway, Suite 300
San Diego, CA 92101
Debbie@sdhc.org
4. Hitzke Development Corporation
251 Autumn Drive, Suite 100
San Marcos, CA 92069
ginger@hitzkedevlopment.com
5. South Bay Community Services
1124 Bay Blvd #D
Chula Vista, CA 91911
(619) 420-3620
klembo@csbcs.org
6. Andrea Skorepa, Chief Executive Officer
Casa Familiar
119 W. Hall Avenue
San Ysidro, CA 92173
andreas@casafamiliar.org
7. Kathy Stone, CEO
Affordable Housing Applications
8139 La Mesa Blvd PMB 806
La Mesa, CA 91941
kstone@ahahousing.com
8. Susan Baldwin, Housing
SANDAG
401 B Street, Ste. 800
San Diego, CA 92101
sba@sandag.org

9. Catherine A. Rodman, Director & Supervising Attorney
Affordable Housing Advocates
4305 University Avenue, Suite 110
San Diego, CA 92105
ahadvocates@sbcglobal.net
10. St James Lutheran Senior Housing
Falkenberg/Gilliam & Associates Managed Properties
1560 W Colorado Blvd
Pasadena, CA 91105-1415
P O Box 7070
Pasadena, CA 91105
11. Falkenberg/Gilliam & Associates
Wesley Terrace Office
5343 Monroe Avenue
San Diego, CA 92115-3429
VrtarRose@fga-net.com
12. John W Chamberlain for Imperial Beach Gardens
Imperial Strand Holdings
Alamo Quarry Market, American Assets Trust, Inc
11455 El Camino Real # 200
San Diego, CA 92130-2047
info@americanassets.com
13. Ellen Immergut, Manager of Development and Communications
San Diego Habitat for Humanity
10222 San Diego Mission Road
San Diego, CA 92108
elleni@sdhfh.org
14. San Diego Community Land Trust
ATTN: Rev. Lee Van Ham & Anastasia Brewster
3295 Meade Ave
San Diego, CA 92116
anastasia@sdclt.org
15. Chelsea Investment Corporation
5993 Avenida Encinas, Suite 101
Carlsbad, CA 92008
info@chelseainvestco.com
16. Sue Reynolds, President & Chief Executive Officer
Community Housing Works
4305 University Avenue Suite 550
San Diego, CA 92105
sreynolds@chworks.org

17. Francis X. Riley, Field Office Director
US Department of Housing and Urban Development
[San Diego Field Office](#)
Symphony Towers
750 B Street, Suite 1600
San Diego, CA 92101-8131
Francis.X.Riley@hud.gov
18. Jennifer Seeger, Program Manager
California Department of Housing and Community Development
1800 Third Street
Sacramento, CA 95811-6942
jseeger@hcd.ca.gov
19. San Diego Association of Realtors
4845 Ronson Court
San Diego, CA 92111
govaffairs@sdar.com
20. San Diego Interfaith Housing Federation
7956 Lester Avenue
Lemon Grove, CA 91945
cepps@sdihf.org
21. Legal Aid Society of San Diego
110 South Euclid Avenue
San Diego, CA 92114
MaricelaW@lassd.org
22. San Diego County Apartments Association
8788 Balboa Avenue, Suite B
San Diego, CA 92123
csullivan@sdcaa.com
23. Lutheran Social Services – San Diego
3101 Fourth Avenue
San Diego, CA 92103
jtaylor@lsssc.org
24. Office of Government and Public Affairs
Health and Human Services Agency
County of San Diego
1700 Pacific Highway
San Diego, CA 92101
Caroline.Smith@sdcounty.ca.gov

25. San Diego Regional Center
South County Center
2727 Hoover Avenue, Ste. 100
National City, CA 91950
cflores@sdrc.org.
26. Creative Support Alternatives
3590 Camino del Rio North, Suite 121
San Diego, CA 92108
kvandeburgt@gmail.com
27. San Diego Association of Realtors
South County Service Center
884 Eastlake Parkway, Suite 1629
Chula Vista, CA 91914
28. San Diego Job Corps Center
1325 Iris Avenue, Building 60
Imperial Beach, CA 91932-3751
business@jobcorps.gov
29. Patricia Hutchins
Imperial Beach Chamber of Commerce
702 Seacoast Drive
Imperial Beach, CA 91932-1871
Pathut@aol.com

A.2 Public Meetings

August 1, 2012 – City Council

On August 1, 2012, the City Council conducted a public hearing to receive comments on the community's housing needs and the Draft Housing Element.

A.3 Comments Received

San Diego Community Land Trust

The City of Imperial Beach received comments from the San Diego Community Land Trust. The SDCLT urges the City of Imperial Beach to participate in the land trust in order to expand affordable housing opportunities in the City (see letter attached). Specifically, the SDCLT provided draft language to be included in the Housing Element.

Due to the dissolution of the Redevelopment Agency, the City is unable to participate in land acquisition activities. The Housing Element includes programs to promote affordable housing opportunities through mixed use land use policies, and continued participation in County programs.

San Diego Housing Federation

Sean Wherley, Policy Direction of the San Diego Housing Federal (SDHF), attended the August 1, 2012 City Council meeting and SDHF provided written comments (see attached letter) on the City of Imperial Beach Draft Housing Element. SDHF has three key comments:

1. SDHF supports the City's efforts to reduce parking requirements at mixed-use developments and recommends further reduction for affordable housing developments.
2. SDHF recommends broadening the residential areas that allow accessory units and eliminating the requirement of separate utility hook-ups for accessory units.
3. SDHF recommends incentives for affordable housing be provided automatically rather than as options.

The City of Imperial Beach approved the First Reading of the Zoning Code amendments to promote mixed-use developments in the City on August 1, 2012. Such amendments reduce the commercial parking requirements for mixed use developments, keeping the residential parking requirements for multi-family development at 1.5 parking spaces per residential unit and allow for shared parking (described in detailed in the Housing Element). These residential parking standards are already lower than the State density bonus requirements for affordable housing for units with two or more bedrooms. Parking standards for zero or one-bedroom affordable units will be reduced to one space per unit, pursuant to State density bonus law. If additional incentives are required to enhance project feasibility, the City routinely considers further reductions in parking standards.

Second Units is an ongoing subject of debate in the City of Imperial Beach. As was explained to Mr. Wherley, Imperial Beach is basically a built-out community. There is not a lot of land for new development. Any redevelopment of a neighborhood had the potential to threaten its character. Prior to 1992, the zoning in Imperial Beach provided for greater heights and densities for development. However, development that occurred under those codes was not respectful of existing residential development and raised traffic/parking impact issues. Imperial Beach citizens passed Proposition P in 1992, an initiative that downzoned much of the City and instituted design review requirements to ensure that new development respected existing development. The Proposition P provisions were incorporated into the new General Plan/Local Coastal Program (LCP) that was certified by the Coastal Commission in 1994 and is still in effect currently. A general plan is to reflect the development goals of the community. A responsible community would have its general plan provide for a wide range of housing types, including single-family and multiple-family units. This is reflected in the 1994 General Plan/LCP. During the housing boom, developers took advantage of the allowed density to construct second units. From 2005 to 2010, 79 second units (page H-71) were constructed (1.3 units per month) in the R-3000, R-3000-D, R-2000, and R-1500 Zones. Also, 99 total units (4th Housing Element Table 38) were built from 2000 to 2005 (1.6 per month) or 143 total units (Table H-20) were built from 2000 to 2010 (1.2 units per month). When the housing crash occurred, construction activity fell dramatically. Six units have been constructed over the past 30 months (one per 5 months). The "only 7 units" per year figure cited by Mr. Wherley would actually represent robust construction activity compared to the slowdown that Imperial Beach is experiencing now. Even during the housing boom period, developers did not always fully exploit the density allowed by zoning. There are still underutilized sites where second units can be built. It is not necessary to make zoning amendments to allow additional units that would threaten or eliminate single-family neighborhoods. Table H-6 shows that Imperial Beach has a lower percentage of single-family units than San Diego County and Imperial Beach has a higher percentage of multiple units than San Diego County. These figures demonstrate that the City's existing zoning is not constraining for affordable housing and certainly not exclusionary.

Nevertheless, the City will continue to explore this subject during the planning period of this Housing Element.

Pursuant to the State density bonus law, the City provides a range of incentives (such as expedited review, parking reductions, fee deferrals) for affordable housing development. Such incentives are granted if the applicant can provide a written financial statement detailing the incentives are necessary to make the project financial feasible. Each project may require different incentives and the City withholds the discretion of considering the most feasible and appropriate incentives on a case-by-case basis.

Regional Continuum of Care Council, San Diego Grantmakers Homelessness Working Group

Dolores Diaz, Interim Director for the Regional Continuum of Care Council, attended the August 1, 2012 City Council meeting and spoke in support of comments made by SDHF.

Draft Housing Element Language
Adding the Community Land Trust Model to First Time Homebuyer Options
by
San Diego Community Land Trust

First-time Homebuyer Programs for Low and Moderate Income Households

Cities and counties in California have traditionally enabled low and moderate income households to purchase their first homes using the Mortgage Credit Certificate Program and providing silent second home loans that are re-paid when the home sells. Some cities have also required market-rate homebuilders to sell a percentage of their developments to low & moderate income homeowners. This document proposes to add an additional program that cities can use to meet their home ownership goals: the **Community Land Trust** model of home ownership.

How a Community Land Trust Works

A community land trust is a nonprofit organization formed to hold title to land to preserve its long-term availability for affordable housing and other community uses. A land trust typically receives public or private donations of land or uses government subsidies to purchase land on which housing can be built.¹ The homes are sold to lower-income families, but the CLT retains ownership of the land and provides long-term ground leases to homebuyers. The CLT also retains a long-term option to repurchase the homes at a formula-driven price when homeowners later decide to move.

The “classic” CLT balances the multiple interests of homeowners, neighborhood residents, and the city as a whole in serving as the steward for an expanding stock of permanently affordable, owner-occupied housing. Homeowners leasing and living on the CLT’s land (leaseholder representatives), residents of the CLT’s service area (general representatives), and individuals representing the public interest (which may include municipal officials) each make up a third of a typical board of directors. This tripartite structure ensures that different land-based interests will be heard, with no single set of interests allowed to dominate.

On an operational level, CLTs take on a range of responsibilities for developing and stewarding their lands. Some focus on creating only homeownership units, while others take advantage of the model’s flexibility to develop rental housing, mobile home parks, commercial space, and other community facilities. Most CLTs initiate and oversee development projects with their own staff, but others confine their efforts to assembling land and preserving the affordability of any buildings located upon it.

In their capacity as stewards, CLTs provide the oversight necessary to ensure that subsidized units remain affordable, that occupants are income-eligible, and that units are kept in good repair. Because they retain permanent ownership of the land under housing and other structural improvements, CLTs are closely connected to the homes and to the households that live in them. And as the landowner,

¹ See the Lincoln Institute Policy Report “The City-CLT Partnership: Municipal Support for Community Land Trusts”, June 2008, available for download: http://www.lincolnst.edu/pubs/1395_The-City-CLT-Partnership.

the CLT collects a modest monthly ground lease from every homeowner, allowing the CLT to monitor its assets, protect its investment, and support residents who experience financial difficulties.

Although specific stewardship roles differ from one community to the next, nearly every CLT performs the following tasks:

- assembling and managing land;
- ensuring that owner-occupied homes remain affordably priced;
- marketing the homes through a fair and transparent process;
- educating prospective buyers about the rights and responsibilities of owning a resale-restricted home;
- selecting income-eligible buyers for the homes;
- monitoring and enforcing homeowner compliance with contractual controls over the occupancy, subletting, financing, repair, and improvement of their homes;
- verifying that homeowners maintain property insurance and pay all taxes;
- managing resales to ensure that homes are transferred to other income-eligible households for no more than the formula-determined price; and
- intervening in cases of a homeowner's mortgage default.

At least one California City has included this model in their most recent housing element. The City of Petaluma has identified that the Housing Land Trust of Sonoma County will be the primary means that they achieve their home ownership goals.

Proposed Housing Element Policy/Program Language

The following language can be used as a model for each jurisdiction to add to their housing element.

The city shall encourage the use of community land trusts (San Diego Community Land Trust) for first time homebuyers in the following manner:

1. Donate city-owned residential property for the development and/or rehabilitation and sale of homes for first-time homebuyers with a ground lease held by the community land trust.
2. Grant local, state or federal funds designated for first-time homebuyer subsidy to the CLT to acquire homes to be sold to first-time homebuyers with a ground lease held by the community land trust.
3. Encourage market rate developers that have an inclusionary requirement to partner with a community land trust to develop, market and steward the for sale units required by the inclusionary ordinance with a ground lease held by the community land trust.
4. Provide grants or contracts to the community land trust to improve the capacity of the land trust to develop and provide the ongoing stewardship of the land trust properties.
5. Consider contracting with the community land trust to monitor compliance of all outstanding city first-time homebuyer loans and other agreements with long term affordability requirements that are enforceable by the city.



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Executive Director

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.

San Diego's Voice for Affordable Housing

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.

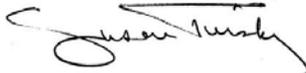
In addition, we would recommend the city’s ordinance requiring separate utility hook-ups for accessory units be changed so that an accessory unit may draw from the same water meter or gas/electric meter serving an existing home. Requiring only one utility hook-up per parcel will drop the cost of building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



Susan Tinsky
Executive Director

Appendix B: Review of Previous Housing Element

Program #	Program Name	Description	Progress and Continued Appropriateness
Goal #1: Housing Opportunities and Accessibility			
A	CDBG and HOME funds	The City staff will continue to coordinate with the San Diego County Consortium to apply for the funding that is made available through the County CDBG and HOME funds. The City will use these funds to support rehabilitation and redevelopment programs that benefit very low, low and moderate-income households.	<p>Between 2005 and 2011, the City received approximately \$ 858,913.00 in CDBG and \$0 in HOME funds through the Urban County program annually. In the past, the City has used these funds for the Civic Center and Loudon Lane Crosswalk Projects, Fire Station improvements and equipment purchase, pedestrian safety and ADA ramp improvements, and construction and installation of three city parks improvements in low and moderate income neighborhoods.</p> <p>Continued Appropriateness: The City does not receive HOME funds. The use of CDBG funds will be discussed in the Resources section of the Housing Element and incorporated as funding sources for appropriate housing programs. These funding programs are not included in the 2013-2021 Housing Element as a separate housing program.</p>
B	ESG, Farmworker Housing Grant, and CalHOME funds	City staff will increase its coordination with the State HCD staff to apply for the funding that is made available through the Housing and Emergency Shelter Trust Fund Act of 2002, including the Joe Serna Jr. Farmworker Housing Grant Program and the CalHome Program. Further, the City will apply for funding through the loan and grant program directory provided to the City by HCD annually.	<p>Between 2005 and 2011, the City did not receive ESG, Farmworker Housing, or CalHOME funds.</p> <p>Continued Appropriateness: ESG, Farmworker Housing Grants and CalHOME funds are funding sources. The City does not directly receive these funds. These funding programs are removed from the 2013-2021 Housing Element as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
C	Redevelopment funds	The City of Imperial Beach Redevelopment Agency will continue to use redevelopment revenues of \$4.1 million in accordance with the Redevelopment Agency's five-year Implementation Plan. The City plans to use this money to purchase deteriorated housing units and finance their improvements, and to provide gap financing for housing projects.	<p>As of October 2011, the City had approximately \$ 780,000 in redevelopment funds available. In the past, the City has used these funds for the rehabilitation of multi- and single-family residential units. As of the writing of this Housing Element, the City's ability to retain its LMIHF is uncertain, pending on the adoption new State legislation.</p> <p>Continued Appropriateness: Redevelopment funds represent an important funding source for the City. Redevelopment funds are incorporated as a funding source for various housing programs in the Housing Element but are not separately identified as a housing program.</p>
D	Project Information Brochure	Prepare a Project Information Brochure outlining City participation and incentives, housing needs from the Housing Element (or other market source), a definition of the state and federal funding for which the City is willing to apply, and other pertinent information. Distribute the brochure to local non-profit and for-profit development groups, and regional agencies.	<p>The City prepared an Affordable Housing Booklet and began distributing it in July 2007. The Booklet is currently available at the Community Development Department.</p> <p>Continued Appropriateness: This action is incorporated in the 2013-2021 Housing Element as part of an overall program to facilitate housing development in the City.</p>
E	Pre-Development Meetings	In order to ensure a timely and efficient planning process the Planning Department will offer pre meetings with developers of proposed affordable projects to strategize about project design, City standards, necessary public improvements, and funding strategies.	<p>City staff continued to offer pre-development meetings with developers.</p> <p>Continued Appropriateness: This ongoing staff function is discussed in the 2013-2021 Housing Element but not included as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
F	Homebuyer Assistance Programs	Continue the City's promotion of programs such as the Housing Finance Agency Agency's Down Payment Assistance Program, the County of San Diego's Down Payment and Closing Cost Assistance Program and San Diego Regional Mortgage Credit Certificate Program by providing brochures outlining these programs at public locations.	Between 2005 and 2011, 2 households have purchased homes through various homebuyer assistance programs. Continued Appropriateness: The City will continue to promote housing programs available through the County. This is included in the 2013-2021 Housing Element.
G	Regional Development	Attend the San Diego Association of Governments meetings to track regional development.	City staff continued to participate in regional planning efforts. Continued Appropriateness: This is routine staff function and is not included in the 2013-2021 Housing Element as a separate housing program.
H	Housing Legislation	The City will continue to monitor State and federal legislation pertaining to housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as supporting new legislation when appropriate.	City staff continued to monitor State and federal legislation pertaining to housing. Continued Appropriateness: This is routine staff function and is not included in the 2013-2021 Housing Element as a separate housing program.
I	Homeless Needs	Meet with San Diego Regional Task Force on Homeless to assess homeless needs and address homelessness that may occur by implementing the goals and priorities addressed in the San Diego Homeless Continuum of Care Plan.	Staff continued to participate in the San Diego Regional Task Force on Homeless and Homeless Continuum of Care. Continued Appropriateness: This is routine staff function and is not included in the 2013-2021 Housing Element as a separate housing program.

Program #	Program Name	Description	Progress and Continued Appropriateness
J	Homeless and Transitional Shelters	Actively support efforts of homeless service providers who establish short-term bed facilities for segments of the homeless population including specialized groups such as the mentally ill and chronically disabled. Identify potential land that can be used for a homeless or transitional shelter should one be needed. Offer incentives to developers such as the waiving of development fees to construct a facility.	<p>No homeless or transitional housing facilities were constructed in Imperial Beach between 2005 and 2011.</p> <p>On August 15, 2012, the City Council adopted Ordinance No. 2012-1130 to amend provisions for the C/MU Zones. Emergency shelters for the homeless are permitted by right in the C/MU1 zone.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element now includes a program to amend the Zoning Ordinance to address the provision of transitional housing and supportive housing.</p>
K	Housing for Special Needs	Investigate incentives and reporting procedures that can be implemented to encourage and monitor the development of housing opportunities for specialized housing needs.	<p>No homeless or transitional housing facilities were constructed in Imperial Beach between 2005 and 2011.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element now includes a program to amend the Zoning Ordinance to address the provision of transitional housing and supportive housing, and other special needs housing.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
L	Housing Rehabilitation Program	With the adoption of the housing rehabilitation program guidelines, include a grant to very low and low-income senior citizens and very low and low-income disabled persons to improve accessibility and safety.	<p>The City's Clean and Green Program provides qualified very low, low and moderate income single-family homeowners with grants for energy efficient and water conservation improvements. Also, an eligible expense in the program is the installation of accessibility improvements. The program completed 93 projects.</p> <p>Continued Appropriateness: The Housing Clean and Green Program remains an important component of the City's housing services. This program is included in the 2013-2021 Housing Element.</p>
M	Residential Care Facilities	Revise zoning ordinance to allow State licensed group homes, foster homes, residential care facilities, and similar state-licensed facilities with six or fewer occupants, deemed permitted by right in a residential zoning district, pursuant to state and federal law.	<p>The City of Imperial Beach will revise its Zoning Ordinance in 2012. In accordance with State law (CA Health and Safety Code Section 1566 – 1566.8), Imperial Beach treats residential care facilities serving six or fewer persons as a normal residential use and these facilities are permitted by-right within all residential zones.</p> <p>Continued Appropriateness: This program is included in the 2013-2021 Housing Element.</p>
N	Reasonable Accommodations	Regularly monitor the City's ordinances, codes, policies, and procedures to ensure that they comply with the "reasonable accommodation" for disabled provisions.	<p>The City does not currently have specific accommodation procedures for the disabled in its municipal code.</p>
O		Develop and formalize a general process that a person with disabilities will need to go through in order to make a reasonable accommodation request in order to accommodate the needs of persons with disabilities and streamline the permit review process.	<p>Continued Appropriateness: The 2013-2021 Housing Element includes a program to address reasonable accommodation within one year of the Housing Element adoption.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
P	Farmworker Housing	Work with farm owners and labor providers to determine the number of farmworkers who may be in need of additional housing in the area surrounding Imperial Beach. The resulting report should address: permanent workers, seasonal resident workers, and migrant workers, including unaccompanied migrant workers. In addition, should the report demonstrate a need, the City, in conjunction with local developers, will identify potential sites and/or provide or seek financial assistance to prospective developers of the housing for farm labor through the Joe Serna Farmworker Grant Program.	The City is primarily built out and does not have any significant agricultural productions. The City does not have any zones where agricultural production is a permitted use by right. Continued Appropriateness: This program is not included in the 2013-2021 Housing Element.
Q		Revise the City's Zoning Code to ensure compliance with employee labor housing act, specifically H&S 17021.5 and 17021.6.	

Program #	Program Name	Description	Progress and Continued Appropriateness
R	Single Room Occupancy (SROs)	<p>Institute Zoning Ordinance amendment in accordance with SB2 requirements stating that transitional housing and supportive housing shall be treated as a proposed residential use and subject only to those restrictions applicable to other residential uses of the same type in the same zone and the same type of structure. The City will designate commercial and high density residential as the appropriate zoning district to accommodate emergency shelters by right. The allowance for Single Room Occupancy (SRO's) shall be encouraged and facilitated through identification of potential locations and through city assistance with grant writing for the development of SRO projects.</p>	<p>Currently, the Imperial Beach Zoning Ordinance does not provide for SROs in commercial zones.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element includes a program to address the provision of SRO housing within one year of the adoption of the Housing Element.</p>
S	Manufactured Housing	<p>Institute Zoning Ordinance amendment to include manufactured housing as an approved alternative housing type, as per State of California requirements.</p>	<p>The City already has in its Zoning Ordinance (Chapter 19.68) provisions that reflect State law (Government Code Section 65852.3) regarding manufactured homes permitted in single-family residential zones. However, there have been no manufactured homes constructed in the City between 2005 and 2011.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element will note that this program/objective was accomplished in 1994.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
T	Section 8 Housing Vouchers	Work with the Housing Authority and use all the influence the City has to obtain more Housing Vouchers for the Housing Authority.	<p>Approximately 415 Imperial Beach residents receive Housing Choice Vouchers through the County's Housing Authority.</p> <p>Continued Appropriateness: The Housing Choice Voucher Program is an important resource for very low income households in Imperial Beach. This program is included in 2013-2021 Housing Element.</p>
Goal #2: Remove Constraints			
U	Permits and Processing Procedures	Monitor average processing times for discretionary development permits on an annual basis and continue to promote a coordinated City review process among affected City departments to reduce delays and processing time.	As part of the 2013-2021 Housing Element update, the City evaluated its current zoning and permit process provisions and identified areas of improvements.
V		Analyze current zoning and permit process provisions and propose new changes during the update to the Zoning Code to further reduce housing costs and average permit processing time. AECOM is currently conducting an analysis that would more clearly identify the criteria under which mixed-use projects that contain residential units in commercial zones could be approved and, thereby, remove an element of uncertainty in its approval process. Upon completion of the study, the City will commit to implementing zoning and permit processing changes as suggested to reduce housing costs and processing times provided that the changes are reasonable.	<p>In addition, the City retained a consultant (AECOM) to implement a Commercial Zoning Review.</p> <p>Continued Appropriateness: The key recommendations of the Commercial Zoning Review have been incorporated into the 2013-2021 Housing Element.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
W	Affordable Housing Incentives	<p>The City will provide incentives (e.g., density bonus units, fee underwriting, fee deferral, fast-tracking, etc.) to developers for retaining this stock as well as seek the assistance of other affordable housing developers in the rehabilitation and preservation of these units. In addition, for developers utilizing these incentives, the City will establish affordability covenants to ensure the affordability of the project over time. In addition, redevelopment sites that include affordable housing components will be given priority in the fast tracking process to further encourage developers to seek redevelopment opportunities and to make the redevelopment sites more attractive. By making redevelopment more attractive, developers will be more willing to engage in downtown projects which meet other goals of this element.</p>	<p>The City has not yet revised its Zoning Ordinance to reflect State density bonus law. Between 2005 and 2011, no affordable housing units were constructed in Imperial Beach. Specifically, no affordable housing units were constructed as a part of mixed use developments.</p> <p>Continued Appropriateness: The City will continue to offer incentives for affordable housing development. This program is included in the 2013-2021 Housing Element. The City will revise the Zoning Ordinance to include the State density bonus provisions within one year of Housing Element adoption.</p>
X		<p>To facilitate mixed use development on sites included in Appendices E and F, the City will provide relaxed development standards for mixed-use developments (commercial or office uses must be on same site as housing) providing an affordable housing component. To further encourage development of mixed use sites, the City will post inventory or available sites on the City's website, and identify potential financial resources to assist in development (i.e. RDA or CDBG funds). Update the City's existing density bonus ordinance the provisions of SB 1818 (Chapter 928, Statutes of 2004).</p>	

Program #	Program Name	Description	Progress and Continued Appropriateness
Y	Planning Fees	Review current planning fees and where appropriate make changes to reflect the affordability of multifamily development.	<p>Annually, the City reviews its fee schedule to ensure City fees reflect the cost of providing services. To facilitate affordable housing, the City offset the fees with other incentives such as fee underwriting/deferral, financial assistance, density bonus, and fast track processing.</p> <p>Continued Appropriateness: Review of planning fees is a routine task and is not included in the 2013-2021 Housing Element as a separate housing program. However, fee deferral/ underwriting are included as part of the program to facilitate affordable housing and mixed use development through incentives.</p>
Z	Second Dwelling Units	Encourage developers to include second dwelling units as an integral part of their project and to plan for second dwelling units in the design of their projects by providing incentives such as fast-tracking to speed up the review process.	Second units are allowed by-right within the R-3000, R-2000, and R-1500 residential zones. However, the City Council has determined that allowing second units in R1-6,000 and R1-3,800 zones is not in the best interest of the public health, safety, and welfare and adopted findings to preclude second units in those zones.
AA		The City of Imperial Beach will re-examine existing provisions for second units and adopt a new Second Unit Ordinance that satisfies the provisions found under the recently amended Section 65852.2. This new ordinance will determine the zones in which second units are allowed, and the development standards for second units. Monitor the production and affordability of second units on an annual basis.	<p>Between 2005 and 2011, 79 second units were constructed in the City.</p> <p>Continued Appropriateness: Second units are viable affordable housing options in Imperial Beach. The City will continue to facilitate second unit development.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
BB	Affordable Housing Incentives	Provide incentives to developers of residential projects, when feasible, who agree to provide the specified percentage of units mandated by State law at a cost affordable to very-low and/or low-income households or senior citizens such as waiving certain development fees.	See discussions under Program W. Continued Appropriateness: The 2013-2021 Housing Element includes a program on affordable housing incentives.
CC	Public Awareness	Publish the City's Housing Element and updates, Annual Action Plan and respective notices in all public facilities including City Hall, the community center, and the public library	As required by State law and City policies, these City documents are posted on City website and available at the City Hall. Public notices are posted at all public facilities. Continued Appropriateness: This is a routine function and is not included in the 2013-2021 Housing Element as a separate housing program.
DD	Zoning Ordinance Revisions	Review the appropriateness of reducing, waiving, and/or deferring impact and/or processing fees for units affordable to very low and low income households, including senior housing, and apartment units, and housing for special needs groups, including agricultural employees, emergency/transitional housing, and housing for persons with disabilities, to make the development of such units more financially feasible. The City will commit to waiving and/or deferring impact and/or processing fees for the above noted units if the waiver and/or deferral is appropriate and should be done in order to meet the City housing goals and policies set forth herein.	The City has waived or deferred fees for housing projects since 2005. To facilitate housing development, the City provided parking requirement relief for two projects. Continued Appropriateness: This program offers fee deferral, reduction, or waiver for affordable housing development. This program is included in the 2013-2021 Housing Element as part of the overall program to provide incentives for affordable housing.

Program #	Program Name	Description	Progress and Continued Appropriateness
EE	Flexible Development Standards	Allow flexibility, where appropriate and consider aesthetics, safety public input, etc., in infrastructure and development standards and land use and zoning controls in order to encourage affordable residential development.	<p>The City has approved the modification of development standards for two housing projects since 2005. Typical modifications include: parking requirement relief.</p> <p>Continued Appropriateness: Flexible development standards are included as part of the City's overall program to incentivize affordable and mixed use developments. Provision of flexible development standards is not included in the 2013-2021 Housing Element as a separate housing program.</p>
FF	Annual Monitoring	Annually evaluate whether there are constraints on the development, maintenance and improvement of housing intended for persons with disabilities. The analysis will include a monitoring of existing land use controls, permit and processing procedures and building codes. If any constraints are found in these areas, the City will initiate actions to address these constraints, including removing the constraints or providing reasonable accommodation for housing intended for persons with disabilities.	<p>The City last completed a review of its existing land use controls, permit and processing procedures and building codes concerning housing for persons with disabilities in 2009, as a part of the development of the San Diego Regional AI. The Regional AI identified the City's potential constraints on housing for persons with disabilities and outlines the City's plan to remove and/or mitigate these constraints as necessary. These findings are incorporated in the 2013-2021 Housing Element.</p> <p>Continued Appropriateness: Review of City policies and regulations is a routine staff function. This is not included in the 2013-2021 Housing Element as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
Goal #3: Provide and Maintain an Adequate Supply of Sites for the Development of New Affordable Housing			
GG	Vacant Land Inventory	Update the inventory of vacant land on a quarterly basis or as projects are constructed.	<p>The City is primarily built out and because of the recession, housing development in the City has been limited in recent years. As a result, many of the properties identified in the inventory are still available for development.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element includes an updated residential sites inventory.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
HH	Partnerships with Developers	Partner with a development organization to redevelop parcels as identified in Appendix F to provide multifamily rental opportunities affordable to low or moderate income residents. Furthermore, the City will provide incentives to the developer through the provision of gap financing with the Redevelopment Agency's LMI funds and apply for HOME or CDBG financing through the San Diego County Consortium. In addition, the City will provide other incentives such as fee waivers or deferrals, fast tracking, and provide technical support during the rezone process and the project approval process to ensure that the project goes through the planning process smoothly. The City will solicit three to five potential developers by October 2009 to collaborate in the development of these housing units. City will make contact with developers to identify level of interest and ability to make project happen. It is expected that with the implementation of this program, the City will net 15 units of housing that would be affordable to low-income residents.	<p>Since adoption of the 2005-2012 Housing Element, the housing market in San Diego region has been seriously impacted by the recession. Development interests have been limited not only in the City but in the region as a whole.</p> <p>Continued Appropriateness: The City will continue to partner with developers. This program is included in the 2013-2021 Housing Element.</p>
II		Establish a list of non-profit developers who would be interested in developing affordable housing in the City. Send these providers a development packet including multifamily vacant land inventory, services, and housing incentives.	

Program #	Program Name	Description	Progress and Continued Appropriateness
JJ	Housing Element Review	Annually review the housing element for consistency with the general plan as part of its general plan progress report.	<p>Annually, the City submits report to SANDAG on the City's progress in meeting the RHNA. When the General Plan is amended, appropriate findings are made to ensure internal consistency among all General Plan elements.</p> <p>Continued Appropriateness: This is a routine planning function and is not included in the 2013-2021 Housing Element as a separate housing program.</p>
KK	Mixed Use Development	Encourage development of well planned and designed projects that provides for the development of compatible residential, commercial, industrial, institutional, or public uses within a single project or neighborhood by continuing to provide incentives such as allowing higher building intensities, reduced parking requirements, reduced set-back and yard requirements, allow for a higher building height, and greater floor area ratios in these zones. In addition, the City will work closely with the developer of these projects to expedite processing and permit procedures.	<p>The City is undertaking a review of the commercial zoning for the Palm Avenue/SR-75, Seacoast Drive, Old Palm Avenue, and 13th Street / Imperial Beach Boulevard areas. For these areas, the City is assessing development concepts that will help achieve the community's overall vision for Imperial Beach. Specifically, the City is exploring development regulations for improving the design of commercial and mixed-use projects. The intent of the review is to encourage and facilitate sufficient commercial and retail development to support the City's residents while allowing for well-designed and suitable mixed-use development compatible with maintaining and enhancing Imperial Beach's existing character and quality of life.</p> <p>Continued Appropriateness: Mixed use represents an important tool to provide additional housing in the community. This program is included in the 2013-2021 Housing Element.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
LL	Large Units	Work with the development community to identify the incentives and programs that will encourage the construction of three and four bedroom rental units.	<p>Since adoption of the 2005-2012 Housing Element, the housing market in the San Diego region has been seriously impacted by the recession. Few housing units have been constructed.</p> <p>Continued Appropriateness: The City will continue to work with developers to include some larger units in rental developments. This program is included in the 2013-2021 Housing Element.</p>
MM	Zoning for Affordable Housing	Monitor the amount of land zoned for both single-family and multi-family development and initiate zone changes to accommodate affordable housing.	<p>The City is conducting a review of commercial zoning to facilitate commercial and mixed use developments. Depending on the outcome of the review, the City may amend its Zoning Ordinance to modify development standards. However, the City does not anticipate rezoning additional land for residential uses.</p> <p>Continued Appropriateness: This program is removed from the 2013-2021 Housing Element.</p>
NN	Downzoning of Properties	Implement the provisions of AB 2292 (Dutra) and prevent the down-zoning of a residential property used to meet the RHNA without a concomitant up-zoning of a comparable property.	<p>The City has not downzoned any properties since the 1994 General Plan/LCP/Zoning.</p> <p>Continued Appropriateness: The City commits to providing adequate sites for its RHNA. The 2013-2021 Housing Element includes programs to address this commitment, including maintaining a sites inventory, monitoring the development trends, and reviewing the development standards of commercial zoning. This program is removed from the 2013-2021 Housing Element as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
Goal #4: Preserve, Rehabilitate, and Enhance Existing Housing and Neighborhoods			
OO	Design Review Standards	Continue to monitor new developments for compliance with City design standards. Revise the current Design Review Standards to reflect these goals.	<p>As part of the Commercial Zoning Review, the City will assess also design standards that work to facilitate quality mixed use developments.</p> <p>Continued Appropriateness: This program is incorporated as part of the Commercial Zoning Review effort and is not included in the 2013-2021 Housing Element as a separate housing program.</p>
PP	Coastal Zone Housing Requirements	The City will monitor all demolitions and conversions and ensure that replacement units are provided when needed under the Coastal Zone Housing Requirements.	<p>Of the 18 units demolished from 2005-2011, 15 of them were in the coastal zone. Of the 92 units constructed during this period, 60 of them were in the coastal zone. However, Government Code Section 65590(b)(3) provides that jurisdictions with less than 50 acres of vacant private land within the coastal zone need not provide replacement units in place of demolished units. Imperial Beach has much less than 50 acres of vacant land.</p> <p>Continued Appropriateness: The City will continue to monitor and comply with the coastal housing requirements. This program is included in the 2013-2021 Housing Element.</p>
QQ	Code Enforcement	Enforce existing regulations regarding derelict or abandoned vehicles, outdoor storage, and substandard or illegal buildings and establish regulations to abate weed-filled yards when any of the above is deemed to constitute a health, safety or fire hazard.	<p>The City continued to provide code enforcement services to preserve and improve the City's existing housing stock.</p> <p>Continued Appropriateness: Code Enforcement is a routine City service and is not included in the 2013-2021 Housing Element as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
RR	Energy and Water Conservation	Supply energy and water conservation awareness brochures in all public meeting places.	<p>The City has continued to provide information on energy and water conservation at public counters.</p> <p>Continued Appropriateness: This is a routine City service and is not included in the Housing Element as a separate housing program.</p>
SS	Neighborhood Revitalization Strategy	Continue to implement the programs of the Neighborhood Revitalization Strategy of 1998.	<p>This program was disbanded in 2006 by the City Council.</p> <p>Continued Appropriateness: This program is no longer relevant.</p>
TT	Housing Rehabilitation Programs	Apply for and aggressively market CDBG, HOME and Redevelopment single family housing rehabilitation programs to meet the goal of rehabilitating 15 units by 2010.	<p>Since 2005, the City has provided assistance to 93 households for housing rehabilitation through City and County programs.</p> <p>Continued Appropriateness: Housing Rehabilitation Program is included in the 2013-2021 Housing Element.</p>
UU	San Diego Housing Authority's Home Improvement Program for Rental Property	The City will continue to advertise the County of San Diego Housing Authority's Home Improvement Program for Rental Property.	<p>This program is no longer available from the County. The County focuses the use of housing funds on new construction and acquisition/rehabilitation of rental properties.</p> <p>Continued Appropriateness: This program is removed from the 2013-2021 Housing Element.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
VV	California Housing Partnership Corporation	Continue regular contact with the California Housing Partnership Corporation, the agency that monitors the at-risk units and owner notifications of intent to opt-out. Request to be remained on their mailing or email notification list.	<p>No at-risk affordable housing project was converted to market-rate housing between 2005 and 2011.</p> <p>Continued Appropriateness: The 2013-2021 Housing Element includes a program to monitor and work to preserve the City's affordable housing inventory. The California Housing Partnership Corporation (CHPC) is one of the resources for monitoring the at-risk status of publicly funded programs; CHPC is not included in the Housing Element as a separate housing program.</p>

Program #	Program Name	Description	Progress and Continued Appropriateness
Goal #5: Provide Housing Free from Discrimination			
WW	Fair Housing Laws	Require that all recipients of locally administered housing assistance funds acknowledge their understanding of fair housing law and affirm their commitment to the law.	<p>The City continued to participate in the Urban County's Fair Housing Program. Fair housing services are available to Imperial Beach residents, landlords, and housing professionals through the County's contract (currently with South Bay Community Services). Information about fair housing laws and services are available at public counters. The City's website also provides information of tenant/landlord rights and responsibilities.</p> <p>In 2009, the City participated in the Regional Analysis of Impediments (AI) to Fair Housing Choice coordinated by the County and City of San Diego. The AI examines conditions in the public and private sectors that may impede fair housing choice. Results of the AI have been incorporated into the 2013-2021 Housing Element.</p> <p>Continued Appropriateness: Actively further fair housing is an important community goal. This program is included in the 2013-2021 Housing Element.</p>
XX	Fair Housing Outreach	Acquire and maintain fair housing materials, including all pertinent resource, posters and information available through the Department of Fair Employment and Housing (DFEH) and Housing and Urban Development (HUD) to educate citizens on a variety of fair housing issues. Develop information flyers and brochures that highlight: (1) disability provisions of both federal and state fair housing laws and (2) familial status discrimination. Fair housing materials, brochures and flyers will be distributed at outreach events including school fairs, health fairs, and City sponsored events. Collaborate with service agencies to distribute educational materials.	
YY	Fair Housing Program	The City participates in the County of San Diego Fair Housing Program. All fair housing calls are referred to this organization for follow-up.	

Program #	Program Name	Description	Progress and Continued Appropriateness
Goal #6: Encourage and Enhance Coordination of Housing			
ZZ	Housing Authority Membership	Maintain membership in the Housing Authority to qualify City residents for Housing Choice Voucher - existing housing assistance administered by the San Diego Housing Authority. Provide information on the availability of County programs to qualified residents.	As of November 2011, 415 Imperial Beach households are receiving Housing Choice Vouchers. Continued Appropriateness: The Housing Choice Voucher program is included in the 2013-2021 Housing Element. Maintaining membership with the San Diego County Housing Authority is a requirement to participate in the Housing Choice Voucher program. Therefore, Housing Authority Membership is not included in the 2013-2021 Housing Element as a separate housing program.
AB	Partnership with Non-Profit Housing Organizations	The City will continue to utilize nonprofit housing organizations to provide financial assistance and technical support in the development of affordable housing and the acquisition and rehabilitation of existing multi-family housing. Non-profit organizations include the South Bay Community Services, Sunburst School, Inc-Children's Treatment Center, and Lutheran Social Services of Southern California.	Since 2005, no affordable housing units have been constructed in the City as a result of partnership with nonprofit housing organizations. Continued Appropriateness: The 2013-2021 Housing Element includes a comprehensive program to facilitate affordable housing development, including partnership with nonprofit organizations. This partnership program is not included in the 2013-2021 Housing Element as a separate housing program.

Appendix C: Residential Sites Inventory

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
1	6262500900	667 Palm Ave	Rose A. Vogt 2006 Trust	Marginal chiropractic and acupuncture offices within single story building in poor condition.	C-1/General Commercial	1 du/ 1,000 sf	20,300	20	16	UU
2	6262500200	705 Palm Ave	Parmela Sawhney Revocable Trust	Marginal medical office within one story building in poor condition.	C-1/General Commercial	1 du/ 1,000 sf	34,600	34	27	UU
3	6262821300	766 10th St.	Borgia Family Trust	Dilapidated one story single family unit. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	7,000	7	5	UU
4	6262822600	730 10th St	Robert J. & Frankie Johnstone	Marginal coin operated self car wash. Minimal improvements in poor condition. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	14,000	14	11	UU
5	6262822500	740 10th St	Richard Bartel Trust (DCSD)	Marginal salon and computer repair businesses within a single story building in poor condition. Majority of the lot is paved with minimal landscaping. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	10,500	10	8	UU
6	6262821400	754-760 10th St	Rosalio Castro	Marginal glass sales business within small dilapidated building and outdoor storage. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	8,750	8	7	UU
	6262821500									
7	6262910500	753 10th St	Paulette Goycochea	Operating towing company. Fabricated metal building with storage/junk on side yard.	C-1/General Commercial	1 du/ 1,000 sf	7,350	7	5	UU
8	6262821900	987 Palm Ave	Rosa Duran	Auto repair and car storage lot. Improvements in poor condition. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	21,440	21	17	UU
	6262822000									
	6262822100									

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
9	6262820300	975 Palm Ave	John G & Phyllis M. Mason	Two parcels under common ownership. Marginal auto repair in dilapidated single story building and poorly maintained paved car storage lot. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	8,050	8	6	UU
	6262820400									
10	6261700500	656 Florida St & 1144 Palm Ave	Frankie Mikkelson	Two parcels under common ownership. Marginal hair salon within small single story commercial building in poor condition and a 1960s-era one story single family home in fair condition. (Group of contiguous sites #10, 11, 12, 13 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	12,710	12	10	UU
	6261700800									
11	6261700600	1138 Palm Ave	Hutchins Family Trust	Very small single story marginal property management company within building in fair condition. Most of the lot is gravel parking. (Group of contiguous sites #10, 11, 12, 13 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	5,240	5	4	UU
12	6261700700	1130 Palm Ave	Jean Moinat	Small two-story duplex in poor condition. Debris in yard. Minimal, poorly maintained landscaping. (Group of contiguous sites #10, 11, 12, 13 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	5,580	5	4	UU
13	6261700900	640 Florida St	William & Deborah Blake Family Trust	Very small single story home in poor condition on two adjacent and unmaintained parcels. (Group of contiguous sites #10, 11, 12, 13 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	14,690	14	11	UU
	6261702300									
14	6262301000	1151 Calla Ave	B&P Florence St LLC	Three small single story homes in poor condition. (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	9,240	9	7	UU

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
15	6262301100	605 Florida St	Garcia Socorro Santana Trust	Two small single story homes in poor condition. (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	11,430	11	9	UU
16	6262301200	627 Florida St	Maximino & Shirley Empizo Revocable Trust	Small single story duplex in poor condition. Most of the lot is undeveloped. Adjacent to large vacant lot. (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	11,010	11	9	UU
17	6262911200	1085 Palm Ave	Paulette Goycochea	Dilapidated single story auto repair with moving truck rentals. Most of the lot used for vehicle storage. (Group of 3 contiguous parcels under single ownership)	C-1/General Commercial	1 du/ 1,000 sf	29,670	29	23	UU
	6262911300									
	6262911400									
18	6263020200	1177 Palm Ave	Edward Wedelstedt	Marginal t-shirt imprint company and adult bookstore within single story commercial building in poor condition. (Group of contiguous sites #18, 19, 20, 21 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	9,740	9	7	UU
19	6263021500	744 12th St	Rob Seder	Small fabricated metal structure on mostly paved lot. (Group of contiguous sites #18, 19, 20, 21 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	14,750	14	11	UU
20	6263021600	1185 Palm Ave	Thrifty Oil Co	Operating discount gas station within single story building in fair condition. (Group of contiguous sites #18, 19, 20, 21 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	23,700	23	18	UU
21	6263022000	1155 Palm Ave	Michael & Gale Family Trust	Marginal tattoo parlor within small single story building in poor condition. (Group of contiguous sites #18, 19, 20, 21 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	9,010	9	7	UU
22	6262421000	1288 Palm Ave	ATT	Operating single story concrete block building in fair condition that occupies most of the lot.	C-1/General Commercial	1 du/ 1,000 sf	16,100	16	12	UU
23	6262820100	951 Palm	Sara R. Parsons	Two parcels under common	C-1/General	1 du/	8,050	8	6	UU

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
	6262820200	Ave & 715 Emory		ownership. Operating bar within small single story building in poor condition. Most of the lot is paved parking. (Group of contiguous sites #3, 4, 5, 6, 8, 9, 23 – potential for lot consolidation)	Commercial	1,000 sf				
24	6262300500	1158 Palm Ave	Dolleen Inc	Operating car wash in single story structure with limited improvements and in poor condition. (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	16,100	16	12	UU
25	6262302000	1180 Palm Ave	Imperial Beach Palm LLC	Abandoned fast food restaurant in dilapidated condition. Listed for sale. (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	17,250	17	13	UU
26	6262021600	639 Delaware St	Hanks Family Trust	Small single story dwelling in poor condition. (Group of contiguous sites #26, 27, 28 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	6,170	6	4	UU
27	6262021500	631 Delaware St	Dustin Spencer	Single story dwelling and detached garage in poor condition. (Group of contiguous sites #26, 27, 28 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	7,080	7	5	UU
28	6262021900	740 Palm Ave	Ramon & Marian Castro Trust	Marginal used car sales lot with small single story cottage structure in poor condition. (Group of contiguous sites #26, 27, 28 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	21,700	21	17	UU
29	6262010600	720-30 Palm Ave	George Morgan	Marginal pharmacy and martial arts facility within single story building in poor condition.	C-1/General Commercial	1 du/ 1,000 sf	14,140	14	11	UU
30	6262011100	700-10 Palm Ave	Farida Family Trust	Operating bar and marginal nail salon within single story building in poor condition. (Group of contiguous sites #30, 31 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	6,000	6	4	UU

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
31	6260705800	690 7th St	Lassman Survivors Trust	Marginal taco shop in dilapidated one story building. Poorly maintained parking lot. (Group of contiguous sites #30, 31 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	9,450	9	7	UU
32	6251400800	550 Palm Ave	Dunham & Associates	Abandoned two-story motel. Building boarded up and fencing around property.	C-1/General Commercial	1 du/ 1,000 sf	45,300	45	36	UU
33	6262811000	738 Emory St	Pappas Family Trust	Single story dwelling in poor condition. (Group of contiguous sites #33, 34 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	7,630	7	6	UU
34	6262811600	744 Emory St	Argoud Family Trust	Small single story dwelling in dilapidated condition on unlandscaped lot. (Group of contiguous sites #33, 34 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	11,400	11	9	UU
35	6252012500	201 Palm Ave	Bob Kipperman	Abandoned former real estate office building in dilapidated condition. (Group of contiguous sites #35, 71, 72, 73 – potential for lot consolidation; majority of these sites are vacant)	C-2/Seacoast Commercial	1 du/ 1,500 sf	5,250	3	3	UU
36	6250230100	198-200 Palm Ave	Greg and Elta Neil	Two parcels under common ownership. Operating auto repair within small single story building in fair condition. Most of the lot is gravel parking/storage.	C-2/Seacoast Commercial	1 du/ 1,500 sf	10,300	6	6	UU
	6250230200									
37	6253802700	1080 Seacoast Dr.	William Mundt Trust	Two parcels under common ownership. Two story apartment building in poor condition. Developer approached City about redeveloping before the market downturn.	C-2/Seacoast Commercial	1 du/ 1,500 sf	37,800	25	20	UU
	6253802700									
38	6252010900	285 Palm Ave	Rahimpour Family Trust	Three parcels under single ownership. Operating restaurant. Small one story building in fair condition. Most of the site is a poorly maintained parking lot. (Group of contiguous sites #38, 74 – potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	31,470	21	16	UU
	6252011000									
	6252011100									
39	6250140500	134 Palm	John Sanichas	Two parcels under common	C-2/Seacoast	1 du/	15,310	10	8	UU

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
	6250140600	Ave	Family Trust	ownership. Operating realty business in very small one story building in fair condition. Most of the lot is pavement or gravel.	Commercial	1,500 sf				
40	6252732300	855 Seacoast Ave	Snow Family Trust	Small single family unit in fair condition. Most of lot is undeveloped.	C-2/Seacoast Commercial	1 du/ 1,500 sf	4,770	3	2	UU
41	6330311900	1133-1155 13th St	Mary Rahimpour	Two parcels under common ownership. Marginal bar and liquor store in dilapidated condition attached to hair salon in fair condition.	C-3/ Neighborhood Commercial	1du/ 2,000 sf	19,350	9	7	UU
	6330312000									
42	6330222700	1257 Imperial Beach Blvd	Marrero Family Trust	Marginal coin operated self car wash. Minimal improvements in poor condition.	C-3/ Neighborhood Commercial	1du/ 2,000 sf	11,620	5	4	UU
43	6253922000	140 Imperial Beach Blvd	Paula Whalen Trust	Small single family unit in poor condition tucked between two newer multi-family developments.	R-2000/ Residential	1du/ 2,000 sf	4,780	2	2	UU
44	6260212200	730 Basswood Ave	US Financial or Don Rady	Marginal 1970s single story industrial building in poor condition. The City has received an application to convert this site into a duplex. (Group of contiguous sites #44, 45 – potential for lot consolidation)	R-3000-D/ Residential	1 du/ 3,000 sf	8,250	2	2	UU
45	6260212300	716 Basswood Ave	William Barnett Estate	Marginal 1970s single story industrial building in poor condition. Similar in location, size, and condition to 730 Basswood. (Group of contiguous sites #44, 45 – potential for lot consolidation)	R-3000-D/ Residential	1 du/ 3,000 sf	8,480	2	2	UU
46	6260324200	413 Delaware St	Ronald and Deborah Cook	Converted garage (~500SF) in poor condition.	R-3000-D/ Residential	1 du/ 3,000 sf	9,010	3	2	UU
47	6250111600	684-686 Ocean Lane	Ed Johnson and Rose Gravino	Vacant	R-1500/ Residential	1 du/ 1,500 sf	5,720	3	2	VAC

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
48	6250111400	670 Ocean lane	Williams Family Trust	Vacant	R-1500/ Residential	1 du/ 1,500 sf	2,780	1	1	VAC
49	6253302800	812 Ocean Lane	Westport Holding Texas LP	Vacant	R-1500/ Residential	1 du/ 1,500 sf	4,000	2	2	VAC
50	6253300500	908-912 Ocean Lane	William Lindley Trust	Vacant	R-1500/ Residential	1 du/ 1,500 sf	6,000	4	3	VAC
	6253300600									
51	6253400300	986 Ocean lane	Kuan Cheng Chen & Chau Hang Le	Vacant (Group of contiguous sites #51, 52 – potential for lot consolidation)	R-1500/ Residential	1 du/ 1,500 sf	4,500	3	2	VAC
52	6251810400	720 Ocean Lane	Robert Schoepe Trust	Two parcels under common ownership. Vacant (Group of contiguous sites #38, 74 – potential for lot consolidation)	R-1500/ Residential	1 du/ 1,500 sf	6,000	4	3	VAC
	6251810500									
53	6331721600	1485 Holly Ave	Karen Huntington	Vacant	R-2000/ Residential	1 du/ 2,000 sf	12,480	6	5	VAC
54	6330910801	1265 12th St	Solomolto LLC	Vacant	R-3000/ Residential	1 du/ 3,000 sf	9,450	3	3	VAC
55	6331021400	1280 14th St	Cynthia Doop	Vacant	R-3000/ Residential	1 du/ 3,000 sf	6,380	2	2	VAC
56	6260220800	375 Delaware St.	Mario H Cortez	Vacant	R-3000-D/ Residential	1 du/ 3,000 sf	11,200	3	3	VAC
57	6320910200	1113 Loudon Lane	Damon & Jessica Stannard	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	8,800	1	1	VAC
58	6320922100	637 Imperial Beach Blvd	Norman Newton Trust	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	6,050	1	1	VAC
59	6321410900	1255 5th St	Thomas Tee Family Trust	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	4,400	1	1	VAC
60	6321411000	1261 5th St	Thomas Tee Family Trust	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	4,400	1	1	VAC

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
61	6321520700	1225 East Lane	Heidi Shott Trust	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	4,400	1	1	VAC
62	6321520800	1229 East Lane	Heidi Shott Trust	Vacant	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	4,400	1	1	VAC
63	6321522200	1210 Connecticut St	Heidi Shott Trust	Vacant (Group of contiguous sites #63, 64 – potential for lot consolidation)	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	2,200	1	1	VAC
64	6321522300	1208 Connecticut St	Heidi Shott Trust	Vacant (Group of contiguous sites #63, 64 – potential for lot consolidation)	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	2,200	1	1	VAC
65	6321522400	1206 Connecticut St	Heidi Shott Trust	Vacant (Group of contiguous sites #65, 66 – potential for lot consolidation)	R-1-6000/ Single-Family Residential	1 du/ 6,000 sf	4,400	1	1	VAC
66	6262301300	647 Florida St	Rudolph L. & Dorothy L. Baker	Vacant (Group of contiguous sites #65, 66 – potential for lot consolidation)	C-1/General Commercial	1 du/ 1,000 sf	21,500	21	17	VAC
67	6252010200	213 Palm Ave	Kevin Dalton	Vacant (Group of contiguous sites #67, 68, 69– potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	5,250	3	2	VAC
68	6252010300	221 Palm Ave	Second Palm Ave LLC	Vacant (Group of contiguous sites #67, 68, 69– potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	5,250	3	3	VAC
69	6252010400	225 Palm Ave	Second Palm Ave LLC	Vacant (Group of contiguous sites #67, 68, 69– potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	5,250	3	3	VAC
70	6252010700	255 Palm Ave	Rahimpour Family Trust	Vacant (Group of contiguous sites #14, 15, 16, 24, 25, 70 – potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	31,470	21	16	VAC
	6252010800									
71	6253301900	75 Date Ave	Gerald/Barbara Farrelly Fam Trust	Vacant (Group of contiguous sites #35, 71, 72, 73 – potential for lot consolidation; majority of these sites are vacant)	C-2/Seacoast Commercial	1 du/ 1,500 sf	2,850	1	1	VAC
72	6253302000	850 Seacoast Dr	Laura Hunt/Harris Family Trust	Vacant (Group of contiguous sites #35, 71, 72, 73 – potential for lot consolidation; majority of these sites are vacant)	C-2/Seacoast Commercial	1 du/ 1,500 sf	2,850	1	1	VAC
73	6252722300	835 Seacoast Dr	Lissoy Family Trust	Vacant (Group of contiguous sites #35, 71, 72, 73 – potential for lot consolidation; majority of these sites are vacant)	C-2/Seacoast Commercial	1 du/ 1,500 sf	9,500	6	6	VAC

Site No.	APN	Address	Owner	Current Use and Potential for Lot Consolidation	Zoning/ GP	Density	Lot Size	Max. Capacity	Realistic Capacity	Type
74	6253512500	Unassigned (NE corner of Seacoast Dr/ Evergreen Ave.)	Howard Land Development LLC	Vacant (Group of contiguous sites #38, 74 – potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	4,590	3	2	VAC
75	6253301800	Unassigned (SW corner of Seacoast Dr/ Date Ave.)	SD Vacation Properties	Vacant (Group of contiguous sites #75, 76 – potential for lot consolidation)	C-2/Seacoast Commercial	1 du/ 1,500 sf	2,780	1	1	VAC
76	6330312500	1335 Imperial Beach Blvd	Joseph and Mary Dirienzo Trust	Vacant (Group of contiguous sites #75, 76 – potential for lot consolidation)	C-3/ Neighborhood Commercial	1 du/ 2,000 sf	6,400	3	2	VAC

