



# CITY OF IMPERIAL BEACH

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## GENERAL PLAN & LOCAL COASTAL PLAN

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\*Update to the document reflect minor amendments to the Circulation Element Certified September 2023

City of Imperial Beach  
General Plan and Local Coastal Plan



Adopted October 19, 1994  
City Council Resolution 94-4427

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# TABLE OF CONTENTS

	<u>PAGE</u>
<b>INTRODUCTION (I)</b>	
THE GENERAL PLAN/LOCAL COASTAL PLAN	I-1
GENERAL PLAN FORMAT	I-1
REGIONAL SETTING	I-2
HISTORY	I-2
CHARACTERISTICS OF THE CITY	I-5
FOCUS OF THE GENERAL PLAN UPDATE	I-7
<b>CIRCULATION ELEMENT (C)</b>	
BACKGROUND	C-1
GOALS	C-12
POLICIES	C-13
<b>CONSERVATION AND OPEN SPACE ELEMENT (CO)</b>	
INTRODUCTION	CO-1
BACKGROUND	CO-1
GOALS	CO-8
POLICIES	CO-8
<b>DESIGN ELEMENT (D)</b>	
BACKGROUND	D-1
GOALS	D-6
POLICIES	D-6

## **FACILITIES AND SERVICES ELEMENT (F)**

INTRODUCTION	F-1
GOALS	F-2
POLICIES	F-4
CITY YARD	F-4
CIVIC CENTER	F-4
FIRE AND EMERGENCY SERVICES	F-5
LAW ENFORCEMENT	F-6
LIBRARY SERVICE	F-8
PUBLIC RIGHT-OF-WAYS	F-9
SCHOOLS	F-13
SOLID WASTE DISPOSAL	F-16
WASTEWATER SERVICE	F-17
WATER SERVICES	F-20

## **HOUSING ELEMENT (H)**

INTRODUCTION	H-6
EXISTING CONDITIONS	H-29
HOUSING ISSUES	H-99
HOUSING PROGRAM	H-102

## **LAND USE ELEMENT (L)**

BACKGROUND	L-1
GOALS	L-2
POLICIES	L-3

**NOISE ELEMENT (N)**

BACKGROUND	N-1
GOALS	N-5
POLICIES	N-5

**PARKS, RECREATION AND ACCESS ELEMENT (P)**

BACKGROUND	P-1
GOALS	P-9
POLICIES	P-9
SHORELINE ACCESS	P-12
BACKGROUND	P-12
GOALS	P-18
POLICIES	P-18

**SAFETY ELEMENT (S)**

BACKGROUND	S-1
FIRE HAZARDS	S-1
FLOOD HAZARDS	S-4
GEOLOGICAL AND SEISMIC HAZARDS	S-6
SHORELINE PROTECTION	S-13
GOALS	S-14
POLICIES	S-15

# TECHNICAL APPENDIX

(Separate Document)

- A. Circulation Element, Technical Report
- B. Conservation Studies
- C. Noise Impact Study
- D. Air Quality Impact Analysis
- E. [Reserved]
- F. Environmental Impact Report
- G. Fiscal/Economic Study

## LIST OF TABLES

### INTRODUCTION

I-1	Imperial Beach General Plan Land Use	1-5
I-2	Imperial Beach Housing Units, 1993	I-6
1-3	Imperial Beach Population	I-6

### CIRCULATION ELEMENT

C-1	Intersection Level of Service Definitions	C-6
C-2	Intersection Level of Service	C-8
C-3	Minimum and Maximum Two-Way Traffic Driveway Widths	C-14
C-4	Improvements Needed to Handle Year 2015 Traffic	C-18

### FACILITIES AND SERVICES ELEMENT

F-1	Imperial Beach School Data, 1993	F-13
-----	----------------------------------	------

### HOUSING ELEMENT

	List of Tables	H-4
--	----------------	-----

### LAND USE ELEMENT

L-1	1993 Land Use and Build-Out Land Use..	L-2
L-2	Land Use Designations and Specifications..	L-7

### PARKS, RECREATION, AND ACCESS ELEMENT

P-1	Parks and Recreation Facilities..	P-4
P-2	Vertical and Lateral Coastal Access..	P-16

# LIST OF FIGURES

## CIRCULATION ELEMENT

C-1	Regional Transportation Access	C-3
C-2	Street System and Traffic Volumes	C-5
C-3	Bus Routes	C-10
C-4	SANDAG Regional Feeder Bikeways	C-12
C-5	Street Classification Plan	C-16
C-6	Bikeways Plan	C-21
C-7	Ecoroute Bikeways	C-22

## CONSERVATION AND OPEN SPACE ELEMENT

CO-1	Tijuana River National Estuarine Research Reserve	CO-5
CO-2	Estuary Vegetation	CO-7
CO-3	Estuary Wildlife	CO-7

## DESIGN ELEMENT

D-1	Functional Areas	D-3
-----	------------------	-----

## FACILITIES AND SERVICES ELEMENT

F-1	Public Facilities	F-3
-----	-------------------	-----

## LAND USE ELEMENT

L-1	Land Use Map	L-4
-----	--------------	-----

## NOISE ELEMENT

N-1	Existing and Projected 65 dB CNEL Noise Contours	N-3
N-2	Ream Field Helicopter Noise Contours	N-4
N-3	Land Use Compatibility Guidelines For Development	N-6

## PARKS, RECREATION AND ACCESS ELEMENT

P-1	Parks and Recreation Facilities	P-5
P-2	1500 Ft. Walking Distance From City Parks & School Facilities	P-8
P-3	Bayfront Park	P-11
P-4	Vertical and Lateral Coastal Access	P-17

## SAFETY ELEMENT

S-1	100 Year Flood Plain	S-5
S-2	Geology	S-7
S-3	Soils	S-12



# INTRODUCTION

*It is highly prized, that edge of California where the earth confronts the sea.*

*Paul Sedway.*

## **The General Plan/Local Coastal Plan**

The Imperial Beach General Plan/Local Coastal Plan is the City's constitution for physical development and change within the city. The Plan is a legal mandate that governs both private and public actions.

The General Plan is atop the hierarchy of local government law regulating land use. Subordinate to the General Plan are specific plans, ordinances and zoning laws. All of the subordinate documents must conform to the adopted General Plan.

State law requires every California City to adopt a General Plan that contains seven mandatory topics called "Elements", (Circulation, Conservation, Housing, Land Use, Noise, Open Space and Safety). Cities may also adopt other optional topics which carry the same weight as mandatory elements. This Imperial Beach plan adds Design, Facilities and Services, and Parks, Recreation and Access as non-mandatory elements. All topics carry equal weight and are designed to be consistent with each other.

Eighty seven percent of Imperial Beach lies within the Coastal Zone. The Coastal Act of 1976 requires the City to have a Local Coastal Plan certified by the State Coastal Commission. This plan is a combined document meeting both the State General Plan requirements and Coastal Plan requirements. All of the General Plan policies are not considered part of the Coastal Plan. Policies that are not a part of the Coastal Plan are identified by an underlining of the policy number.

## **General Plan Format**

The Plan is divided into nine topics (chapters) that are arranged alphabetically. The pages, tables and figures of each topic are numbered to correspond to that specific topic.

A brief background discussion is provided for each topic. Readers wishing more detailed background information are directed to the technical appendices. Each topic includes one or more goals. The plan's sixteen goals are numbered consecutively and set the desired direction for the City.

The goals are followed by a series of policies that establish more explicit directives for both public and private actions aimed at preserving and creating a desirable Imperial Beach.

## Regional Setting

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 a U.S. Naval Communication Station 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.

## History

The first settlers came to the area known as Imperial Beach in the 1880's. 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. The pattern of development followed by the Southern California land promoters was common: (1) A subdivision (2) a hotel or some other attraction at the subdivision site (3) a gigantic land auction (4) the actual building of a community. Step four was the hardest to accomplish.

The first school was built in 1888 at Tenth Street and Elm. In 1920, the first school district was formed when the voters approved a bond issue to purchase the ten-acre site near 19th Street and Coronado.



The original use of the military owned land north of Imperial Beach, in 1880, was for a cavalry troop. The troop provided security along the International Border. On Sunday afternoons, the troop paraded for the entertainment of the residents of Imperial Beach. The old parade ground currently serves the youth of Imperial Beach under the jurisdiction of the YMCA.

In the early 1900's came improvement of the wooden sidewalks, a post office, general store, and dance pavilion and adjoining café. The original pier was built in 1909, at the foot of Donax Street to generate electricity for the town from wave action. Since it

proved to be inadequate, the machinery was dismantled. The pier remained active, attracting large crowds until it was totally destroyed in a 1948 storm. In 1961, a fact finding committee made up of local citizens submitted to the Imperial Beach City Council a report recommending the construction a new fishing pier. In April 1962, the people of Imperial Beach overwhelmingly approved a bond issue of \$300,000 for construction of a fishing pier. A matching funds grant from State Wildlife Conservation Board added further impetus to the project, which was built at its present site at the foot of Evergreen Avenue.

In 1910, E.S. Babcock (builder of the Hotel del Coronado) dredged a channel down the Bay to what is now the north end of Tenth Street. Boats carrying up to 50 passengers made 3-4 trips per day from Market Street in San Diego. A tram met the boats and took the passengers down Palm Avenue to First Street, and back to the landing for their return trip to San Diego. In 1916, a heavy storm washed out the Otay Dam and the resulting flood caused the channel to fill with silt. The channel was never reopened.

The first subdivision called South San Diego encompassed most of the area between 5th Street to 13th Street, north of Palm Avenue and between 9th and 13th Street, south of Palm Avenue. From the southern shore of San Diego Bay, 13th Street ran south for one mile and on into Oneonta. A branch line of the National City and Otay Railroad ran 300 or 400 feet west and parallel to 13th Street.

Imperial Beach was growing very slowly. Water was a problem and electricity was used only for lighting and ironing. Kerosene was used for heating and cooking, and sometimes, for lamps.

Cottages on the beach were used mainly for summer homes, with toilet facilities outside or adjoining the buildings as add-ons. One historian says that Jean Stratton Porter, author of "Girl of the Limberlost," used to spend summers at her uncle's cottage in the 200 block of Elm Avenue.

South San Diego, now known as Imperial Beach, bore the full brunt of the land boom and the eventual bust. The boom in South San Diego has been memorialized in a legend about a naive land buyer who purchased a lot for \$5,000. The next day, after examining his \$5,000 purchase he surmised that he had been gypped. While he was pondering his problem, he was approached by two strangers who asked if his property was for sale. The worried but puzzled land owner took a deep breath and blurted, "Yes, the price is \$12,000." Without batting an eyelash, one of the strangers agreed to purchase the property and handed over the cash on the spot. The former landowner thought it over and reasoned that he overcharged the stranger. The next day, he sought out the new owner of the property and offered to repurchase the land for \$12,000. "Too late," replied the stranger, "I sold it yesterday for \$16,000."

Although this may be just an entertaining tall tale, the fact remains that during the land boom in the South Bay area, fortunes were made. And at the end of the boom, many were lost.

The real estate picture in the south San Diego Bay area was grim at the end of the land boom. It was even more grim following the disastrous floods of 1916 when the Tijuana River overflowed and the Otay Dam broke, washing away everything in its path. This destroyed the railroad system and it was never completely rebuilt. There were no good highways in the area. The main highway through Palm City was not paved until the 1930's.

During the 1930's, the Michigan Investment Company was busy moving houses into Imperial Beach from Tent City Coronado. In 1976 there were any number of Tent City cottages still remaining in Imperial Beach. By putting two of these "shotgun" buildings on a lot and building between them and adding on, a fair-sized building could be constructed. The ones in use today have been remodeled more than one time.

In the latter part of the 30's, the area began to grow, largely due to government defense programs in and around San Diego. Many people came from Oklahoma, Texas and Colorado as well as other states, with hopes of working on these projects. Houses were at a premium, rising beyond what poor people could pay. People lived in tents, trailers and shacks-anything for a cover until they could better themselves. Some were said to have built homes or shacks of airplane packing crates. Building regulations didn't exist in the unincorporated part of the county.

The Depression and prohibition were both in full force but you could get bootleg whiskey at the old hotel on the beach. One area along Palm Avenue was known as Whiskey Flats and featured gambling, too, until a series of raids stopped them.

Ream Field, the Amphibious Base and the Imperial Beach Radio Station were built. Most people who had come here decided to stay after WWII and make their homes in the South Bay area.

Prior to incorporation, Imperial Beach was served by a number of civic organizations under the direction of the County of San Diego. The Imperial beach Civic Group, formed in 1945, was instrumental in forming a Fire Protection District and acquiring a fire truck. It was at this time that many of the streets were renamed in order to facilitate directing the fire truck to fires in the area. The Sanitary District was formed in 1949 to secure County funds for development and attract private capital.

In the early 1950's, the first shopping center was built on the south side of Palm Avenue between Ninth Street and Delaware Avenue. By June 1955, a wide variety of businesses had moved into Imperial Beach.

Imperial Beach was incorporated as a General Law City on July 18, 1956. The first council was sworn into office on July 20, 1956 on the grounds of Coronado Savings and Loan Association (now the site of North Island Federal Credit Union) and its first meetings in the boardroom of the Association.

The boardroom soon proved to be too small to handle the large attendance at the council meetings. The Imperial Beach Fire Protection District had recently constructed new quarters next door to the old fire station so the council contracted for the use of the old building at 166 Palm Avenue, which after some remodeling became the first official City Hall.

The groundwork for the present Civic Center was laid on 1958. In January 1963, the City was awarded a matching funds grant for the construction of a new Civic Center and construction began with a groundbreaking on March 22, 1963.

### Characteristics of the City of Imperial Beach

Imperial Beach is a 4.5 square mile city. 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 and possible reuse of Ream Field.

The proposed land use for the City is shown in table I-1. Over 40 percent of the City is open space or public facilities.

<b>Table 1-1 Imperial Beach General Plan Land Use</b>		
<b>Type</b>	<b>Acres</b>	<b>Percent</b>
Single family attached and detached dwellings and mobile homes	457.7	17%
Two Family	320.2	12%
Apartments and Condominiums	240.8	9%
Commercial	118.3	4%
Urban Reserve	484.0	18%
Open Space and Public Facilities	<u>1134.0</u>	<u>41%</u>
<b>Total</b>	<b>2755.0</b>	<b>100%</b>

As related to housing units, Table 1-2 shows that in 1993 the City was roughly split, with half the housing units in apartments and condominiums and half in single family, two family, and mobile homes.

**Table 1-2  
Imperial Beach Housing Units, 1993**

<b>Type</b>	<b>Units</b>	<b>Percent</b>
Single family	2903	30%
Two Family	1490	15%
Apartments and Condominiums	4979	51%
Mobile Home	<u>291</u>	<u>3%</u>
<b>Total</b>	<b>9663</b>	<b>100%</b>

According to the San Diego Association of Governments (SANDAG), in 1993 the percentage of single-family attached and detached dwellings in Imperial Beach at 48% was one of the lowest percentages of the County's eighteen cities. The County-wide average was 58%. The 1981 Imperial Beach General Plan would have reduced this percentage of single family attached and detached dwellings to 25%. This 1994 General Plan reduces the percentage to 42%.

The City's population growth since incorporation is shown in Table 1-3.

**Table 1-3  
Imperial Beach Population**

<b>Year</b>	<b>Population</b>
General Plan Build Out	30,750
1990	26,512
1980	22,689
1970	20,244
1960	17,773
1956 (Incorporated)	12,000

Under the 1994 General Plan if fully built out, the City could have a population of 30,750. However, few if any, cities ever totally build out. A more likely ultimate build out population would be 29,500.

Almost 80% of Imperial Beach's residents are low or moderate income. The mean household size in 1990 was 2.85 and is expected to decline to 2.68 by 2010. Imperial Beach's 1990 population, while predominantly white, was a cross section of races and

ethnic groups, with 4.9% black, 1.3% Native American, 8.3% Asian and 12.6% other. Hispanics, who can be of any race, represented 28.2% of the population, making Imperial Beach the third most Hispanic city in the region.

The Imperial Beach population is a young one. In 1990, fully 69.1 % of its residents were under age 35 and the median age in the City was 25.8. By comparison, the median age in the San Diego region in 1990 was 31.9. Imperial Beach had the second lowest median age in 1990 among municipalities in the San Diego region; only National City's median age of 24 was lower.

The population of Imperial Beach is weighted heavily not just toward the young, but, specifically, toward children. In 1990, Imperial Beach, with 25.7% of its population under age 15, ranked first among cities in San Diego County in terms of percentage of population in childhood and the early teen years. By comparison, only 20.7% of the regional population was under age 15.

Conversely, Imperial Beach has few seniors. In 1990, 11.3% of the regional population was over age 64. But in Imperial Beach, only 5% of the population was over 64. Imperial Beach is not a retirement community.

Imperial Beach serves as a bedroom community to San Diego and from a commercial and employment perspective is relatively isolated. In relation to commercial development, in 1993 the City captured only about 60% of its potential market that would normally be generated by its population. In 1993, the City had 783,743 square feet of commercial building space. If the City is fully built out under the 1994 General Plan, the commercial square footage would be 1,394,904, an increase of 78%.

### **Focus of the General Plan Update**

This 1994 update of the General Plan/ Local Coastal Plan replaces a plan that was adopted by the City in 1981, more than a decade ago. The new Plan comes at a critical period for Imperial Beach. Economic and fiscal concerns are high on the minds of Imperial Beach residents and are a major concern for every city and county in California. Proposition P, the citizen initiative that reduced building densities and building heights, expires on December 12, 1994. The Seacoast Specific Plan, originally adopted in 1984, has proven to be unworkable and has had the effect of greatly limiting development in the Seacoast area. The juxtaposition of dense four story apartment projects adjacent to one-story single family housing has created considerable community turmoil.

These issues are all addressed in the new Plan. The theme of the new Plan is set by Goal 11 in the Land Use Element that reads:

## **GOAL 11 SMALL BEACH ORIENTED TOWN**

**The overriding goal for Imperial Beach shall be the retention of the quality of life and atmosphere of a small beach-oriented town.**

- **A town that is not overcrowded or exclusive like many California beach communities.**
- **A town with a human scale and a relaxed pace of life.**

A few key features of the Plan include:

### **Circulation**

- ✓ Street, parking and property access standards that emphasize a friendly, pedestrian scaled, small town circulation system.
- ✓ A realistic bikeway plan that can be implemented.
- ✓ A proposed new access to Ream Field from the 1-905 Freeway which will be essential for possible future non-military use of Ream Field.
- ✓ A proposed Class I Bikeway parallel to Highway 75 north of Rainbow Drive.

### **Conservation and Open Space**

- ✓ A plan that recognizes the importance of conservation and open space in setting the image and quality of Imperial Beach.

### **Design**

- ✓ A streamlined Design Element designed to provide a more workable document.

### **Facilities and Services**

- ✓ Policies that call for facilities to be in place at time of need and the up-grading of various facilities.

### **Housing Element**

- ✓ A continuation of the City adopted Housing Element which has been found to be in compliance with State Housing Element law.

## **Land Use Element**

- ✓ Reducing the maximum height of apartment and condominium projects from four stories to three stories.
- ✓ Reducing the highest density apartment/condominium areas from a maximum density of one unit per 1,000 square feet of lot area to one unit per 1,500 square feet of lot area except where specified development incentives are offered.
- ✓ Reducing the ultimate build out of the City from a population of 43,500 to a population of 30,750.
- ✓ Increasing the land area for commercial development along Highway 75 to allow an additional 155,000 square feet of commercial building area.
- ✓ Increasing the percent of single family attached and detached units in the City from a presently planned build out of 24 percent, to a newly planned build out of 42 percent of the residential units.
- ✓ Establishing commercial/mixed use zones along Palm Avenue/State Highway 75, along Old Palm Avenue, along Seacoast Drive, and at 13<sup>th</sup> Street/Imperial Beach Boulevard.
- ✓ Allowing residential units on upper floors in all commercial districts.
- ✓ Replacing the Seacoast Specific Plan in favor of more traditional zoning.

## **Noise Element**

- ✓ Noise standards to preserve a livable community.

## **Park, Recreation and Access Element**

- ✓ Retention of the- beach, bay and estuary as key City park and recreation areas.
- ✓ Creation of a new Bayfront Park.
- ✓ Potential park expansion at a number of locations.

## **Safety Element**

- ✓ Recognition that protection of life and property from hazards posed by flooding, earthquakes, and fires, is a key community goal.

Imperial Beach faces many problems relating to growth and development that must be solved on a regional, and in some cases, international basis. The challenge to find

solutions to these problems, however, does not and should not preclude planning for the kind of future the City wishes to achieve.

The General Plan has a twenty-year horizon. Undoubtedly, as with all plans, changes and amendments will be needed along the way. Nevertheless, the plan as now updated presents a vision of the future for Imperial Beach that is ambitious, and yet, with dedicated civic leadership and community support, both practical and attainable.

# CIRCULATION ELEMENT

*Let's not forget that so often when we talk about the city's problems - say, traffic congestion - we overlook the fact that they are also evidence of the city's vitality. Cities' work, despite all the prophecies of chaos and doom.*

Christian Science Monitor

## BACKGROUND

The Circulation Element is one of the mandatory General Plan elements required by State Planning Law. Additionally, policies on access and transportation are required by the California Coastal Act. In order to project long-term traffic conditions, a detailed traffic study was conducted and is included in a technical appendix to the General Plan.

## REGIONAL HIGHWAY ACCESS

Regional highway access to the City of Imperial Beach is shown on Figure C-1 and is provided from the following facilities:

**Interstate 5 (I-5)** located one mile east of the City is an eight-lane freeway. It extends southward to the United States-Mexico International Border and north through Chula Vista to downtown San Diego and beyond. There are two full diamond interchanges on I-5 serving the City, located at SR-75/ Palm Avenue and Imperial Beach Boulevard/Coronado Avenue. Year 1991 traffic volumes on I-5 ranged from 146,000 average daily traffic (ADT) just north of SR-75/Palm Avenue, 100,000 ADT between SR-75/Palm Avenue and Imperial Beach Boulevard/Coronado Avenue, and 90,000 ADT south of Imperial Beach Boulevard/Coronado Avenue.

**Interstate 805 (I-805):** I-805 is an eight-lane freeway located approximately four miles east of the City of Imperial Beach running north/south parallel to Interstate 5. I-805 originates at the US - Mexico International Border and extends to the north and merges with Interstate 5 in the central portion of San Diego County. The average daily traffic (ADT) volume on this facility in the South Bay ranges from 40,000 ADT to 100,000 ADT between the International Border and Palm Avenue.

These two north/south freeway facilities carry a significant amount of through traffic and are the major routes for commuters going north to San Diego and the Los Angeles area and south to Mexico.

**State Route 905 (SR-905):** SR 905 (previously identified as SR- 117 is a major east/west facility located two miles north of the US - Mexico International Border. SR-

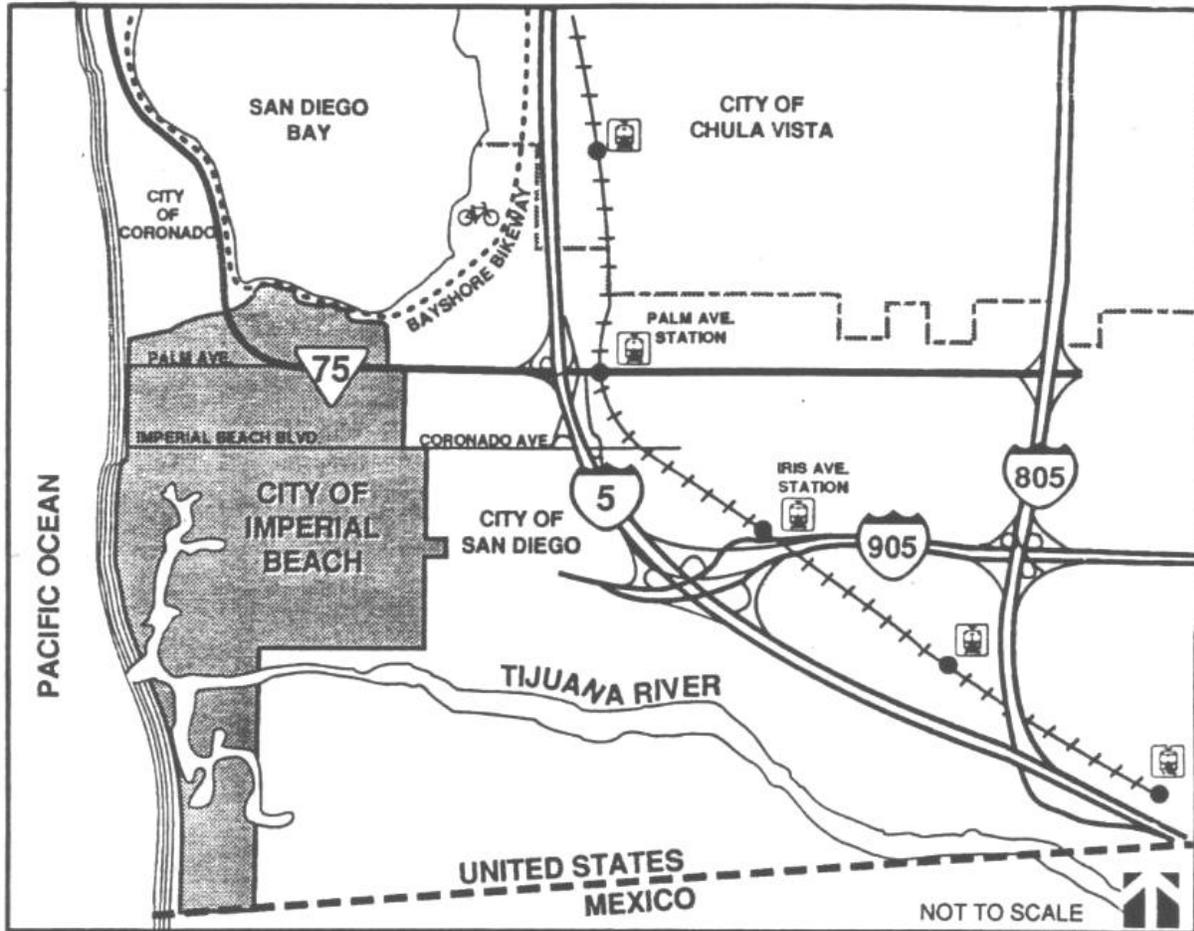
905 is currently a four-lane freeway between I-5 and I-805 transitioning to an at-grade arterial facility further east through the Otay Mesa industrial area in the City of San Diego and ultimately connecting to the Otay Mesa Border Station. SR-905 originates in the City of San Diego approximately two miles east of the City of Imperial Beach. Currently the I-5/SR-905 interchange is a full access clover leaf interchange providing service to the Otay Mesa-Nester Community Plan area in the City of San Diego. The average daily traffic volume (ADT) on SR-905 is approximately 35,000 between the I-5 and I-805 interchanges and 35,000 east of I-805.

Caltrans is planning to construct SR-905 as a six-lane freeway with an ultimate right-of-way reserved for a ten-lane freeway between I-805 and the Otay Mesa Border crossing. This SR-905 freeway improvement project will provide high-level regional service to the international border crossing which is intended to be the major truck crossing between Tijuana, Mexico and the San Diego region. The year 2010 traffic volumes forecast of 50,000 to 80,000 ADT are directly related to growth at Otay Mesa and the border crossing activity. Caltrans does not have any current plans of extending SR-905 to the west from its current termination point at Hollister Street in the City of San Diego. However, with the possibility that Ream Field may be converted to non-military uses, it would be appropriate to examine the possibility of extending an arterial facility along the SR-905 alignment to the west of its present termination point to serve the City of San Diego, the Ream Field area and the City of Imperial Beach.

SR-75/Palm Avenue functions as a six-lane prime arterial in the vicinity of Imperial Beach. It extends westward from I-805 and crosses I-5 through the Otay Mesa community of the City of San Diego into Imperial Beach, where Palm Avenue is joined with SR-75, and northward to the City of Coronado as the Silver Strand Boulevard/ SR-75 Scenic Highway. At Seventh Street in the City of Imperial Beach, Palm Avenue splits from SR-75 and continues westward to Third Street as a four lane Class I collector, and beyond Third Street as a three lane Class II collector. 1991 Traffic volumes on the SR-75/Palm Avenue facility range from 50,000 in the area of Thirteenth Street, to 30,300 west of Seventh Street.

**Imperial Beach Boulevard** extends easterly from Seacoast Drive to the eastern City limits where it turns into Coronado Avenue in the City of San Diego. Coronado Avenue has a full interchange with the I-5 freeway. Imperial Beach Boulevard functions as a four lane Class I collector facility between the eastern City limits and Connecticut Street and as a three lane Class II collector facility west of Connecticut Street. 1993 traffic volumes vary from 16,000 on the east end to 10,300 ADT on the west. Within the City boundaries, there are two signalized intersections on Imperial Beach Boulevard, located at Ninth Street and Thirteenth Street.

**Figure C - 1  
Regional Transportation Access**



### **LOCAL STREET SYSTEM**

The City's local street system, 1993 traffic volumes and build out traffic volumes are shown in Figure C-2. The local street system consists of one prime arterial (SR-75/ Palm Avenue), one major street (SR-75 west of 7th Street), several collector streets, and many residential streets. The street network primarily consists of a uniform grid system, with no limitations on access from minor arterial streets to the primary and secondary arterials. The majority of the unsignalized intersections are controlled only by side-street stops, allowing through traffic on major streets to proceed without delays.

The major streets are described below:

**Palm Avenue** splits from SR-75 at Seventh Street and continues westward Seacoast Drive. Between Seventh Street and Third Street, Palm Avenue is constructed to four

through lanes and functions as a Class I collector with 1993 traffic volumes of 17,700 ADT. West of Third Street, Palm Avenue narrows to two through lanes with a center left turn lane and functions as a Class II collector with 1993 traffic volumes of 9,870 ADT.

**Fifteenth Street** extends south from Imperial Beach Boulevard to Iris Avenue. It functions as a two-lane Class III collector with 1993 traffic volumes of 9,520 ADT.

**Thirteenth Street** extends south from the northern City limits at San Diego Bay to the entrance to Ream Field at Iris Avenue. It functions as a four lane Class I collector south of SR-75/Palm Avenue and as a three lane Class II collector north of SR-75/Palm Avenue, with 1993 traffic volumes of 11,300 ADT.

**Ninth Street** extends south from Cypress Avenue on the north to Ream Field on the south. It functions as a two-lane Class III collector from Cypress Avenue to SR-75/Palm Avenue, and as a three lane Class II collector from SR-75/Palm Avenue south to Ream Field, with 1993 traffic volumes ranging between 3,820 to 6,000 ADT.

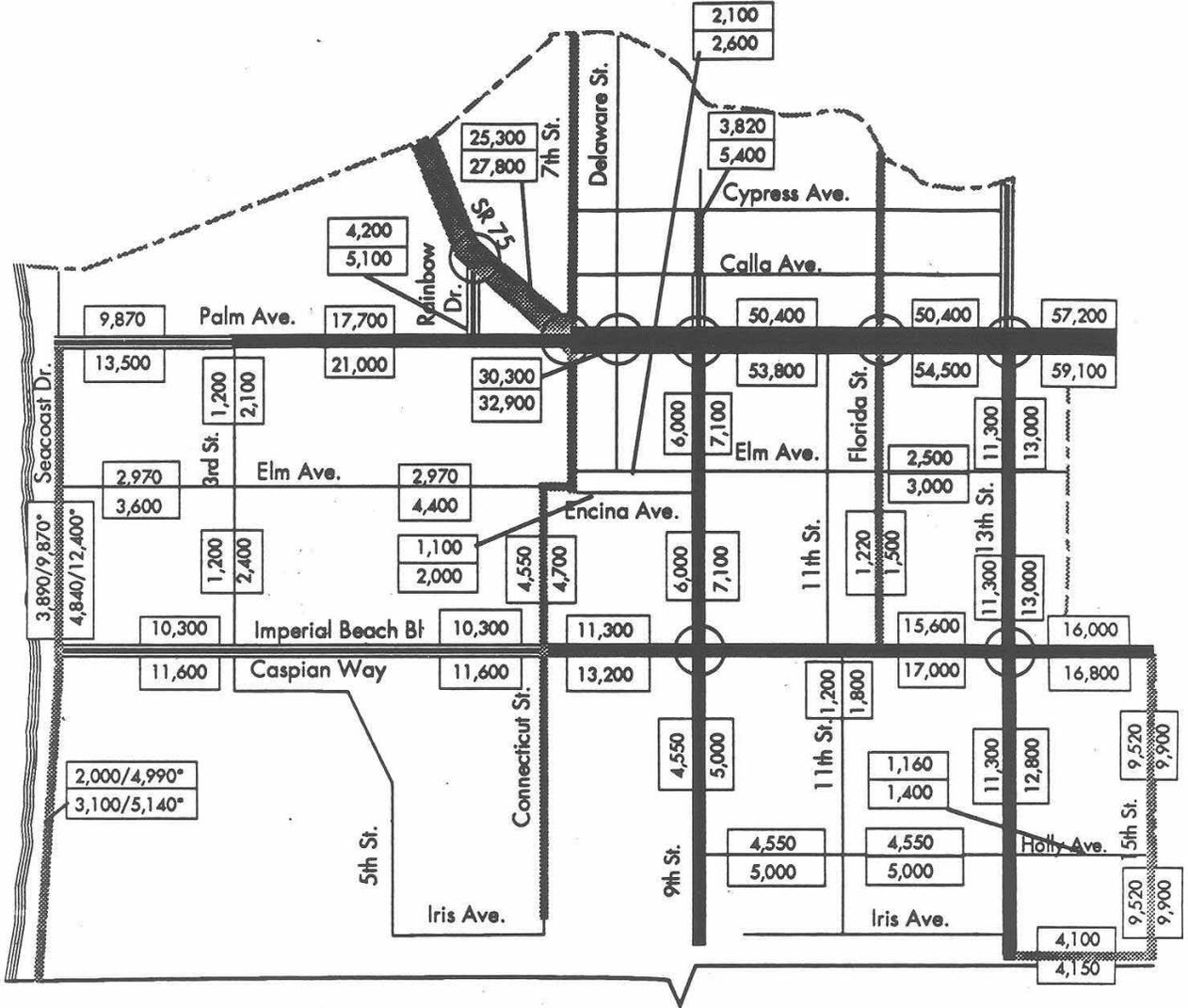
**Seacoast Drive** provides north-south circulation at the western boundary of the City and access to the beach front and functions as a two lane Class III collector. Caltrans daily traffic counts taken in the summer of 1992 indicate that Seacoast Drive experiences traffic volumes ranging between 9,870 ADT between Palm Avenue and Imperial Beach Boulevard and 4,990 ADT south of Imperial Beach Boulevard. However, a count taken in February 1993 showed traffic volumes of approximately 3,890 ADT on Seacoast Drive, between Palm Avenue and Imperial Beach Boulevard. Thus, there are significant differences in seasonal traffic volumes on this main beach access facility. There are currently no signalized intersections on Seacoast Drive.

**Connecticut Street/Encina Avenue/7th Street** function in combination to serve north-south traffic extending from Ream Field and Iris Avenue on the south, to the northern City limits. It functions as a two-lane Class III collector with 1993 traffic volumes of 4,550 ADT.

**Rainbow Drive** is a short north-south street that connects SR-75 and Palm Avenue. It functions as a three lane, Class III collector. 1993 traffic volumes were 4,200 ADT.

**Florida Street** extends north from Imperial Beach Boulevard to the northern City limits. It functions as a two lane, Class III collector. 1993 traffic volumes were 1,220 ADT.

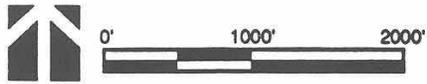
**Iris Avenue** between 13th Street and 15th Street serves as a two lane, Class III collector and connecting to a four-lane collector in the City of San Diego. 1993 traffic volumes were 4, 100 ADT.



**LEGEND**

- 6 LANE PRIME ARTERIAL
- 4 LANE MAJOR STREET
- 4 LANE COLLECTOR (CLASS I)
- 3 LANE COLLECTOR (CLASS II)
- 2 LANE COLLECTOR (CLASS III)
- RESIDENTIAL STREET
- SIGNALIZED INTERSECTION

1993 BUILD OUT	AVERAGE DAILY TRAFFIC VOLUME *SUMMER ONLY
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**STREET SYSTEM & TRAFFIC VOLUMES**

**IMPERIAL BEACH • General Plan | FIGURE C-2**

## INTERSECTION LEVELS OF SERVICE

Because traffic flow on urban arterials is most severely restricted at intersections, a comprehensive analysis of Imperial Beach's traffic flow must examine the operating conditions of critical intersections during peak flow periods. In rating an intersection's ability to accommodate peak hour traffic volumes "Levels of Service" (LOS) A through F are used, with A indicating little or no congestion and F indicating severe congestion.

Level of Service for a signalized intersection is defined in terms of delay seconds per vehicle and average number of stops experienced by vehicles. Delay is a measure of operating conditions a driver experiences in the field such as; quality of progression, cycle length, green time ratio, volume to capacity ratio for the lane group or approach in question, friction, frustration, fuel consumption, and total lost time in travel. These service levels are defined in Table C-1.

**Table C-1**  
**Intersection Level of Service Definitions**

A. Traffic flow conditions with very low delays, i.e., less than 5.0 seconds per vehicle. This occurs when the intersection experiences the following; short cycle lengths, extremely favorable progression, and most vehicles clear the intersection without stopping during the signal cycle.

B. Traffic flow conditions with very little delay in the range of 5.1 to 15.0 seconds per vehicle. This delay can be noticed when the intersection signal is operating under good progression and/or short cycle length. In this case more vehicles stop than under LOS A, causing slightly higher levels of delay.

C. Traffic flow conditions with delay in the range of 15.1 to 25.0 seconds per vehicle. These higher delays are the result of fair progression and/or longer cycle lengths. Under these conditions vehicle stopping is significantly higher than LOS A and B, however, many vehicles still pass through the intersection without stopping.

D. Traffic flow conditions with delay in the range of 25.1 to 40.0 seconds per vehicle. At LOS D, the influence of congestion becomes more noticeable with many vehicles stopping and low proportion of vehicles not stopping. Longer delays may be due to a combination of the following; unfavorable progression, long cycle lengths, or high volume to capacity ratios.

E. Traffic flow conditions with delays in the range of 40.1 to 60.0 seconds per vehicle. This occurs when the intersection experiences the following; longer cycle lengths, poor progression, and high volume to capacity ratios.

F. Traffic flow conditions with a high level of delay in excess of 60.0 seconds per vehicle. This is considered to be unacceptable to most drivers. This occurs when the intersection experiences the following; over saturation, i.e., when arrival flow rate approaching the intersection exceeds the capacity of the intersection to service traffic and also due to long cycle lengths, extremely unfavorable progression, and most vehicles stopping during the signal cycle.

Table C-2 lists the 1993 level of service and build-out level of service for key intersections in the City of Imperial Beach. The build-out level of service is based on existing street geometries except as revised through improvements listed in Table C-4. In 1993 all intersections operated at level of service C or better.

<b>Table C-2 Intersection Level of Service</b>					
No.	Intersection	1993 Peak Hour		Build-Out Peak Hour	
		AM	PM	AM	PM
1	SR 75/Palm Avenue at Thirteenth Street	B	C	C	D
2	SR 75/Palm Avenue at Florida Street	B	C	C	E (D**)
3	SR 75/Palm Avenue at Ninth Street	C	C	C	D
4	SR 75 at Seventh Street	B	B	D	B
5	SR 75 at Rainbow Drive	C	C	D	C
6	Palm Ave. at Seventh St.	C	B	F (B**)	B
7	Imperial Beach Boulevard at Thirteenth Street	C	C	C	D
8	Imperial Beach Boulevard at Ninth Street	B	B	B	B
9	Imperial Beach Boulevard at Fifteenth Street*	E	E	B	A
10	Iris Avenue at Thirteenth Street*	A	B	A	B
*Unsignalized Intersection					
**With Mitigation					

## TRUCK ROUTES

The purpose of designating truck routes in the Circulation Element is to assure that the geometric cross section and structural section of the designated roads are adequate to service heavy and large vehicles. In addition, truck traffic impacts adjacent land use, especially when truck routes are adjacent to residential areas. While trucks may utilize any public street for delivery of goods or services, the designation of truck routes (and prohibition of trucks from certain streets) is desirable to limit their unwanted intrusion into certain areas.

In Imperial Beach the designated truck routes are:

- SR-75/Palm Avenue, from the eastern City limit to Seventh Street
- Imperial Beach Blvd., from the eastern City limit to Ninth Street
- Thirteenth Street, from Palm Avenue to southern City limit
- Ninth Street, from SR-75/Palm Avenue to Imperial Beach Blvd.

## TRANSIT SERVICE

The San Diego Trolley San Ysidro South Line is located approximately 1.25 miles from the eastern City limits and runs just east of I-5 in the City of San Diego as shown on Figure C-1. This trolley line connects downtown San Diego to the United States-Mexico International border as well as to east San Diego County. Two trolley stations, located

at Palm Avenue and Iris Avenue, serve the Imperial Beach area.

As shown on Figure C-3, the City of Imperial Beach is served by three bus routes providing local and regional connections. Service is provided by the Metropolitan Transit Development Board (MTDB) Contract Services. Regional bus route 901 serves downtown San Diego, the City of Coronado, and the City of Imperial Beach, with stops at the Imperial & 12th Trolley Transfer Station, Naval Air Station (NAS) North Island, Silver Strand Beach, and the Iris Avenue Trolley Station. Additional service is provided by Routes 902 and 903, with connections from downtown San Diego to the City of Coronado and NAS North Island, respectively. During Fiscal Year (FY) 1992-93, bus routes 901/902/903 operated approximately 620,000 revenue miles, carried approximately 1.2 million passengers and received \$890,000 in fare revenue, achieving a fare box recovery rate of 54.0 percent. The average trip length for these routes was 6.02 miles.

Local bus service is provided by routes 933/934, which run counter-clockwise/clockwise respectively through the City with stops on Palm Avenue, Seacoast Drive, Imperial Beach Boulevard, Coronado Avenue, the Iris Avenue Trolley Station and the Palm Avenue Trolley Station. During FY92-93, these routes operated approximately 370,000 revenue miles, with 1,000,000 total passengers, \$1,610,000 in fare revenue, achieving a fare box recovery rate of 73.1 percent. The average trip length was 2.7 miles.

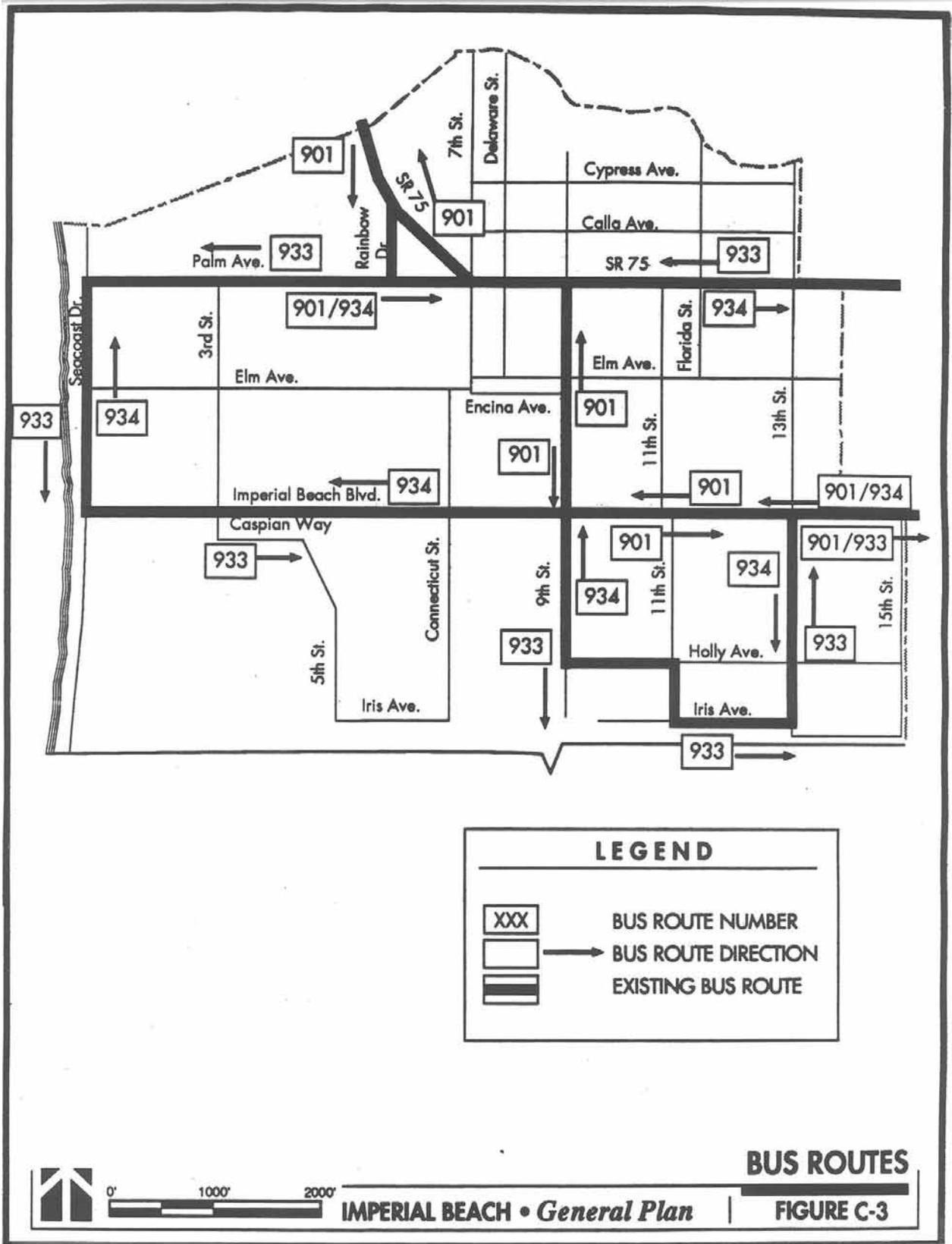
Bus service in Imperial Beach experiences relatively high ridership levels due to the ease of access and connectivity provided by the grid street pattern.

## **BIKEWAYS**

Bikeways are generally defined by the following three classifications:

**Bike Path (Class I):** Provides completely separated right-of-way designated for the exclusive use of bicycles and pedestrians with cross flows by motorists minimized.

**Bike Lane (Class II):** Provides restricted right-of-way designated for the exclusive or semi-exclusive use of bicycles. Through travel by motor vehicles or pedestrians is prohibited, but vehicle parking and cross flows by pedestrians and motorists is permitted. Bike lanes generally consist of a segment of a roadway next to the curb, designated by a solid white line and curb side signs.



**Bike Route (Class III):** Provides right-of-way designated by signs or permanent markings, which is shared with pedestrians or motorists. Bike routes are designated by curbside signs but no other street markings.

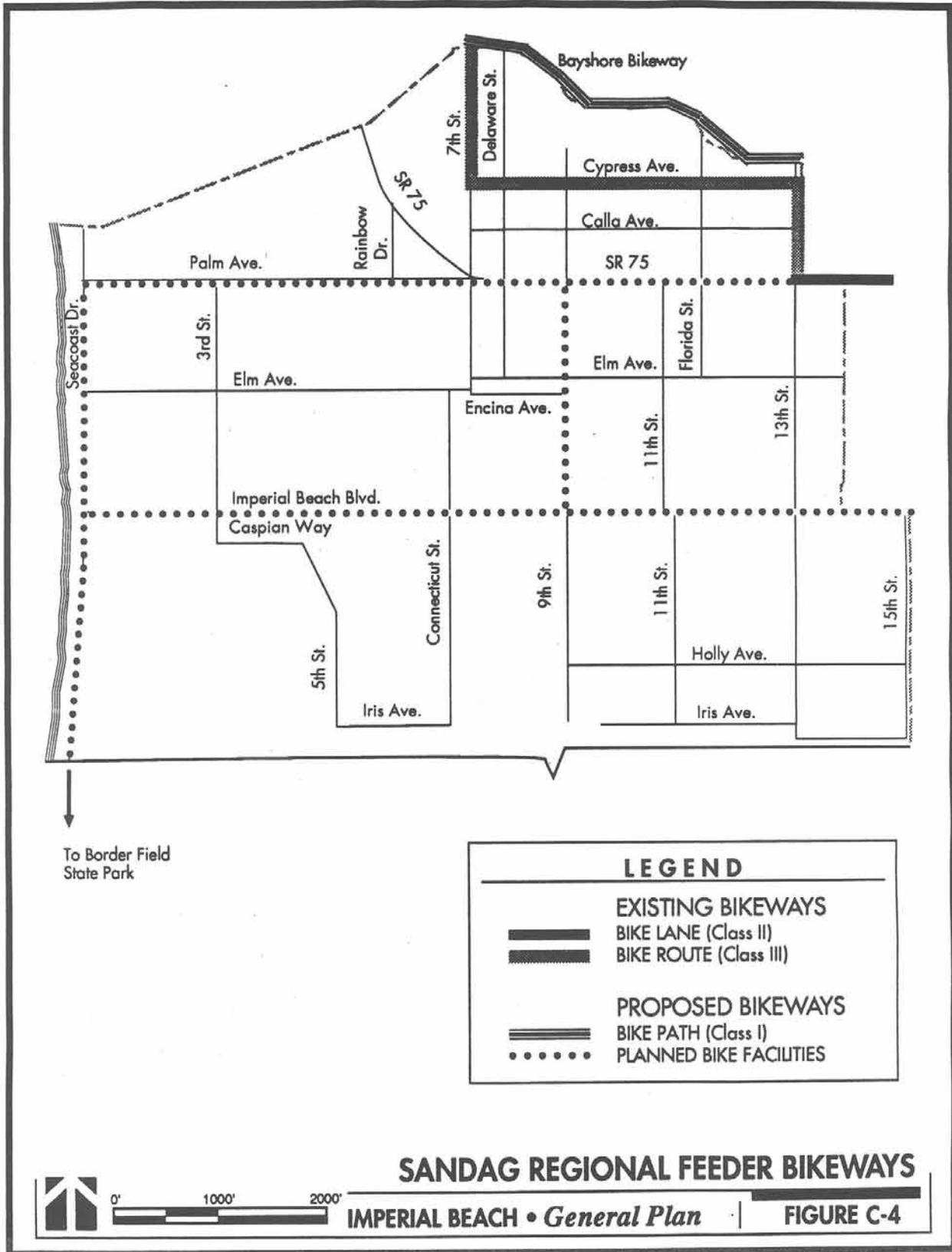
Imperial Beach is part of a proposed 23 mile regional Class I bicycle facility called the Bayshore Bikeway as shown on Figure C-1 and C-4. This route is planned to extend from downtown San Diego at Seaport Village, past the San Diego Convention Center, south through National City and the City of Chula Vista, west through northern Otay Mesa and Imperial Beach and north along the SR-75/ Silver Strand Scenic Highway to the City of Coronado. Bicyclists can return to the Seaport Village area by ferry service provided between Coronado and San Diego. Two portions of the project not yet completed, the Sweetwater River section and the southern section, are scheduled for construction in the year 1995. In the City of Imperial Beach, the southern section of the Bayshore Bikeway is planned as a Class I Bike Path in the area of the MTDB right-of-way at the northern City limits.

Within Imperial Beach, several routes are designated as existing bicycle facilities as shown on Figure C-4. Between the eastern City Limits and Thirteenth Street, a Class II Bike Lane is constructed on SR-75/ Palm Avenue. At Thirteenth Street, a Class III Bike Route is provided from Palm Avenue north to Cypress Avenue, then continues west on Cypress Avenue to Seventh Street. At Seventh Street, bicyclists are directed northward to the Silver Strand portion of the Bayshore Bikeway, a Class I Bike Path, which continues northward through the Silver Strand Beach area and the City of Coronado, on MTDB right-of-way. Other bicycle routes were adopted as part of the 1981 General Plan, but to date have not been implemented. These routes were Palm Avenue, Imperial Beach Boulevard, Seacoast Drive and Ninth Street.

SANDAG's Regional Bikeway System also shows several other Regional Feeder Bikeways in Imperial Beach as shown on Figure C-4. These include:

- ✓ Seacoast Drive, from Palm Avenue south along the beaches all the way to the Mexican Border.
- ✓ Imperial Beach Boulevard.
- ✓ Ninth Street.

The Seacoast Drive to the Mexican Border route is not considered feasible due to the problem of crossing the estuary and environmental impact on the beach and/or estuary. The Ninth Street route is also questionable due to the narrow right-of-way of Ninth Street.



# GOALS

## GOAL 1 BALANCED CIRCULATION

The quality of life and economic vitality of Imperial Beach is dependent upon a safe and efficiently operating circulation system that provides for pedestrians, bicycles, trucks, automobiles and public transportation. Specific aspects of this system should include:

- a. Assure Regional Access**  
Imperial Beach is dependent on its transportation connections to the rest of the region and will pro-actively work with other cities and organizations to preserve and improve this regional access
- b. Safety, Environmental Sensitivity, Energy Efficiency**  
The City will strive for safety, environmental sensitivity and energy efficiency in all transportation designs and improvements. In this system, pedestrian walkways, bicycle paths and public transit will receive the same attention as facilities designed for the automobile.
- c. Service Levels for Streets and Signalized Intersections**  
Arterials and local streets should be designed to operate at service level "C" or better during average daily traffic volume (ADT) conditions. Signalized intersections under peak hour conditions should operate at service level "D" or better. A lower standard is acceptable for special events and seasonal beach related traffic.
- d. Visitor Parking and Traffic**  
Some street parking and traffic for regional daily visitors is accepted within the known constraint that the demand for beach parking may often exceed the supply when the weather and beach conditions are attractive. However, within this context, the volume and regularity of parking and traffic intrusions into residential areas should be minimized where practical.
- e. Quality and Aesthetics**  
Since people move through and about Imperial Beach on the circulation system, their impression of the community is based on the scenic and aesthetic qualities of the system, as well as its functional characteristics. The environment of each neighborhood is also heavily dependent on the quality of the street scene. The City shall emphasize the aesthetic qualities of all streets.

# POLICIES

**C- 1 Street Classification Plan, Design Standards and Dedication Requirements**

Streets shall be classified as shown in Figure C-5. An acceptable Level of Service (LOS) for Palm Avenue west of 7<sup>th</sup> Street to 3<sup>rd</sup> Street shall be LOS E and F with prescribed traffic calming measures implemented tied to alternative transportation system development, such as a bicycle transportation plan. Cross sections, the general right-of-way width and configuration for each street and highway shall be as specified by the City. All street and highway designs should further the goal of providing safe and efficient circulation, as well as an aesthetically pleasing urban form. Developers shall dedicate right-of-ways and street improvements in keeping with the street classification system, as may be required by the City.

**C-2 Street Design and Access**

Street design and access shall include the following principles:

- a. Driveways for corner properties on arterials or collectors shall be located as far away from the intersection as possible. Joint access driveways shared by abutting uses shall be encouraged.
- b. Driveway widths shall be kept narrow in order to retain a pedestrian street scale. Minimum and maximum curb cut widths shall be as set forth in Table C-3. When redevelopment or rehabilitation occurs, existing driveways shall be modified or eliminated to conform to these standards.

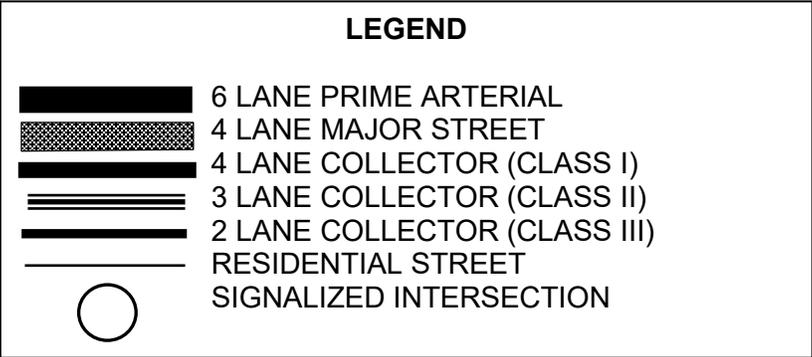
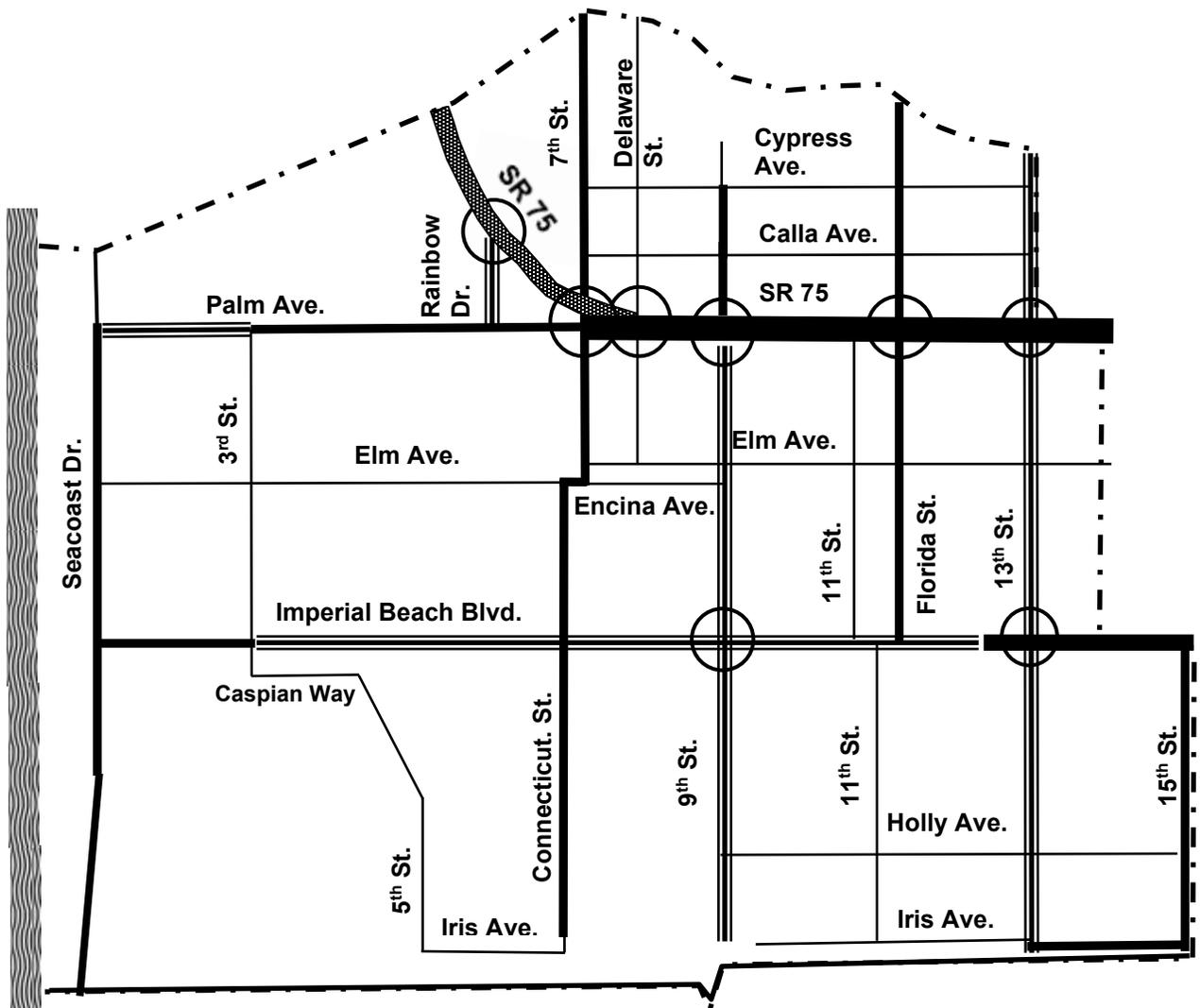
Table C-3 Minimum & Maximum Two-Way Traffic Curb Cuts Widths		
Number of Parking Spaces Accessed By Driveway	Minimum Width	Maximum Width
2-8	12'-0"	16'-0"
9-14	16'-0"	18'-0"
15+	18'-0"	24'-0"*

\*May be increased to 30' for large commercial shopping complexes.

- c. Where residential properties abut both an alley and a street designed as a collector, major or prime arterial, no new street curb cuts or parking layouts requiring backing into the street shall be allowed. Where residential properties abut both a collector, major or prime arterial and a local street, access shall be taken only from the local street.

Other residential properties abutting both an alley and residential street should primarily take access from the alley with the exception that one 16 foot wide curb cut allowing no more than two vehicles to back into the street may be allowed.

- d. Clear and ample signage shall be provided for key facilities such as the beach, pier, Tijuana River Valley and Wildlife Refuge; Border Field State Park, the City Hall complex and city parks.



**STREET CLASSIFICATIONS**



**C-3 Ream Field Access**

The City of San Diego shall be encouraged to amend the City's Otay Mesa-Nestor Community Plan and City of San Diego Circulation Element in order to establish a future right-of-way for a prime arterial between the I-905 freeway interchange and Ream Field. This right-of-way should traverse Tocayo Avenue and include the establishment of a right-of-way to the east of Tocayo Avenue. Tocayo Avenue should be re-designated from a "Major Street" to a "Prime Arterial".

**C-4 Imperial Beach Boulevard Identification**

The City should work with the City of San Diego and Caltrans to rename Coronado Avenue as Imperial Beach Boulevard or as an alternative to recognize both names on the freeway interchange signs.



**C-5 Street Improvements**

The street improvements or comparable improvements listed in Table C-4 shall be completed in order to handle year 2015 traffic within the appropriate service level. These improvements are in addition to any other improvements listed in the other Circulation Element policies.

**C-6 Traffic Signal Timing**

In order to reduce congestion and help reduce air pollution from motor vehicles, the City should consider improving its traffic signal operations by: (a) replacing fixed-time signals with fully-actuated and/or interconnected signals; (b) optimizing signal timing, including adjustments at least every three years; and (c) interconnecting signalized intersections in accordance with the regional Traffic Flow Improvement strategy.

**Table C-4**  
**Improvements Needed to Handle Year 2015 Traffic** \*

- Fifteenth Street
  - From two lanes to four lanes between Iris Avenue and Imperial Beach Boulevard
- SR 75/Palm Avenue/Florida Street Intersection
  - Add an exclusive right hand turn lane for west bound SR-75/Palm Avenue traffic turning north on Florida Street
  - Add an exclusive right hand turn lane for eastbound SR-75/Palm Avenue traffic turning south on Florida Street.
- Palm Avenue/Seventh Street Intersection
  - Add an additional through lane for both east and west bound traffic
  - Add an exclusive left turn lane for northbound traffic on 7th Street turning west on Palm Avenue and a shared thru/right turn lane
  - Create an exclusive left turn lane for southbound traffic on 7th Street turning east on Palm Avenue and a shared thru/right turn lane.

\* These improvements are illustrative. Detailed studies to be conducted at time of need may modify these recommendations.

## **C-7 Truck Routes**

### **a. Truck Routes**

Designated truck routes shall be:

- SR-75/Palm Avenue, from the eastern City limit to Seventh Street
- Imperial Beach Blvd., from the eastern City limit to Ninth Street
- Thirteenth Street, from Palm Avenue to southern City limit
- Ninth Street, from SR-75/Palm Avenue to Imperial Beach Blvd.

### **b. Oversize Load Highway System**

The designated route for oversized loads in Imperial Beach shall be Highway 75/Palm Avenue (from the northern City limits to 13th Street).

(See also Policy N-2 Commercial Vehicles, in the Noise Element.)

## **C-8 80 Foot Right-of-Ways**

The City should reduce the existing 80-foot street rights-of-ways for streets that are not shown as prime, major or collector streets on the Street Classification Plan (Figure 5). Palm Avenue between Ninth Street and Third Street is classified as a 2-lane collector with traffic calming measures and designated for an alternative transportation network, such as on-street bicycle facilities. Other such reductions should take place on a block-by-block basis when initiated by property owners or the City and where it can be shown, by a comprehensive traffic impact analysis, that there will be no public detriment or expense.

## **C-9 Comprehensive Transit Services**

The City shall support the availability of transit service as a means to reduce automobile congestion, to provide transportation for- those who have no other form of transportation, as a means to reduce air pollution, and as a service to visitors.

**C-10 Light Rail**

The City shall support the potential of light rail service to Imperial Beach to the extent that regional agencies can project sufficient ridership to assure economic feasibility.

**C-11 Bus Stops and Bus Transfer Points**

The City should encourage MTDB to enhance Imperial Beach bus loading and unloading stops as well as bus transfer points. The SR-75/Palm Avenue at Ninth Street bus stop should be upgraded to a MTDB Level IV stop to include accessibility to disabled persons, bicycle racks and storage facilities, expanded sidewalk, seating, passenger shelter, route destinations, route map, lighting, time tables for each route, trash receptacles, system map and telephone. The City should encourage MTDB to provide route buses that can accommodate the transportation of bicycles for passengers. The City shall also explore the long term potential for an expanded multi-model transfer station on SR-75/Palm Avenue.

**C-12 Transit Facilities**

As deemed necessary, new developments shall be required to provide or assist in funding transit facilities such as bus shelters and turnouts.

**C-13 Ridesharing**

The City shall promote ridesharing and shall provide ridesharing information to the public.

**C-14 Management Programs**

The City will cooperate with SANDAG to implement future Congestion Management Programs and Transportation Demand Management requirements included in the San Diego Regional Air Quality Strategy.

**C-15 Bikeways Plan**

Bikeways shall be located and classified as shown in Figure C-6. Westbound Palm Avenue between Seventh Street and Rainbow Drive is classified as a Class III Route. Eastbound Palm Avenue is classified as a Class II Bicycle Route from Rainbow Drive to 7<sup>th</sup> Street. The Bikeway Plan is designed to tie into the City of San Diego's Class II Bike Lane on SR 75, to connect to the Bayshore Bikeway and to connect to a new Ecoroute Bikeway as described in Policy C-16.

**C-16 Ecoroute Bikeway**

A special Ecoroute Bikeway shall be established to encompass Imperial Beach's environmental assets including South San Diego Bay, the Tijuana River Estuary,

the dunes on South Seacoast Drive, the beach, the pier and the breakwaters. The eastern portion of the Palm Avenue Ecoroute Bikeway Project should provide a transition between the proposed full-width improvements and the existing 4-lane street road section and improvements, as currently constructed. The general route is illustrated in Figure C-7. Distinctive signage shall be developed to designate the route as well as a painted line on the pavement along the route. Opportunities for interpretive stations should occur along the route, for example:

- ✓ Anywhere along the South San Diego Bayfront.
- ✓ 5th and Iris.
- ✓ The mouth of the Tijuana River at the end of the path in the Refuge.
- ✓ PERL research facilities.
- ✓ The Tijuana Estuary Visitor Center.
- ✓ 3rd Street and Imperial Beach Boulevard.
- ✓ Southern end of Seacoast Drive.
- ✓ Pier Plaza, for the beaches and the environment created by the pier.
- ✓ Western end of Palm Avenue, near or at the intersection of Third Street and Palm Avenue, for the environments created by the breakwaters.

The information presented at the stations should be presented with the objective of describing "WHATS GOING ON." The idea is to explain the different ecosystems, the major roles and players in them and how they are connected together (this includes humans). The information is to be presented on different levels of detail from the superficial for the stop 'n go cyclist to the more sober student of nature who desires to pause, learn and meditate on the "Grand Scheme" all around of which they are a part.

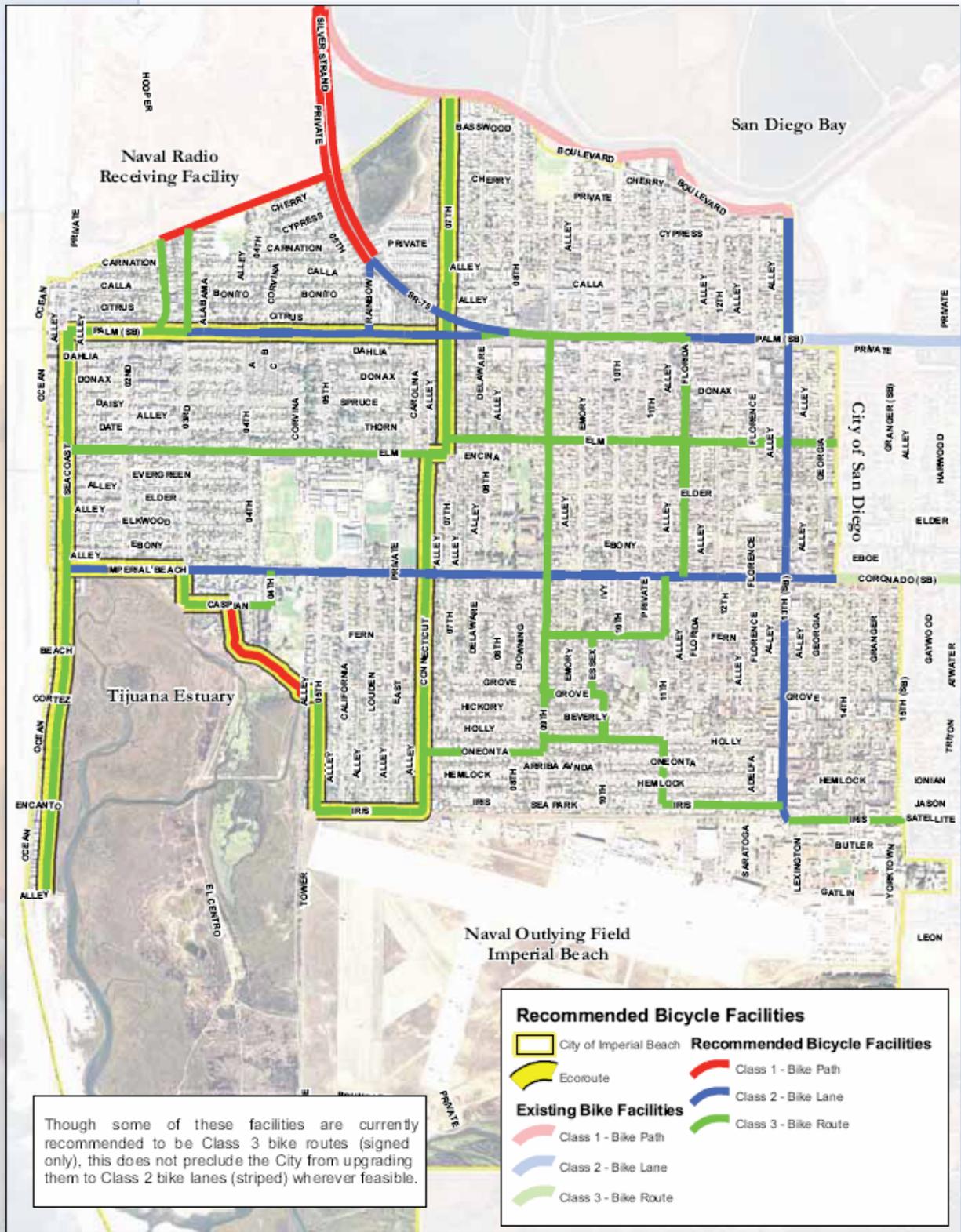
### **C-17 Bayshore Bikeway Extension**

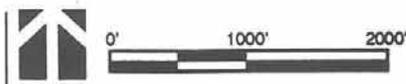
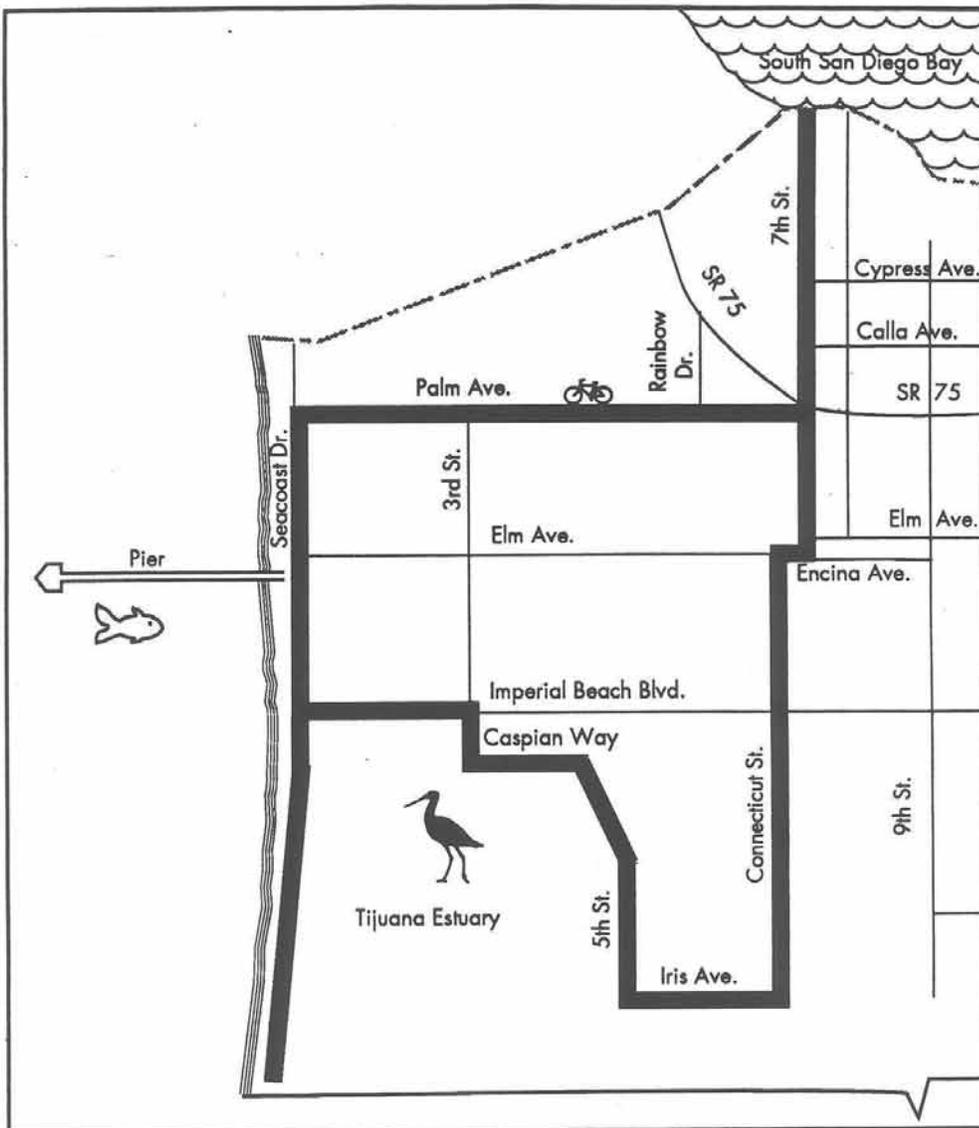
The City shall encourage the construction of an additional leg of the Bayshore Bikeway paralleling SR-75 for a distance of approximately 3,000 feet. This route would be located on the east side of State Highway 75, from Rainbow Drive north to a connection with the Bayshore Bikeway. Such a route would provide a desired connection to the City beach and pier plaza area.

### **Policy C-18 Bike Route – Palm Avenue Corridor**

Palm Avenue between 3rd Street and 9th Street shall be designated as Class II and Class III Bikeway Routes. This segment of Palm Avenue shall be signed to encourage bicyclists and identify the corridor as a part of the City's Eco Bikeway.

Figure C-6 Bikeways Plan





**ECOROUTE BIKEWAY**

**IMPERIAL BEACH • General Plan** | **FIGURE C-7**

### **C-19 Bicycle Facilities Encouraged**

Bikeways shall be encouraged within the City and adjoining jurisdictions as a complement to Imperial Beach's small town residential character and recreation emphasis, as an effective alternative to automobile travel, to maximize the impact on air quality and energy conservation and for the convenience of residents and visitors.

The City shall install bicycle storage facilities in public areas such as the beach, City Hall and parks and in other public facilities in order to encourage bicycle use. Bicycle storage facilities should be considered as a required condition of approval on new development applications for proposed commercial, hotel or major residential projects and/or provided at mass transit and bus system facilities or designated transit stops.

### **Policy C-20 SANDAG Bikeways Plan**

The City shall request that the Seacoast Drive to the Mexican Border Bikeway and the Ninth Street Bikeway be removed from SANDAG's Regional Transportation Plan since these facilities are not practical to construct. The City shall request that SANDAG's Regional Transportation Plan be amended to identify the City's Eco-Bikeway Routes and amend the classification for Palm Avenue between Ninth Street and Third Street to be consistent with changes in City's Bicycle Transportation Plan.

### **Policy C-21 Pedestrian Circulation**

Sidewalks shall be required for all new developments. Normally, the sidewalk shall be located so that a landscape strip for trees and vegetation is located between the sidewalk and the vehicle travel way. City should discourage the use of sidewalks for use as a bicycle route or bicycling facility.

Techniques shall be encouraged to create a pleasant walking experience including concern for views, paving materials, landscaping, street furniture and pedestrian scaled lighting. Traffic calming measures, specifically on the Palm Avenue corridor between Ninth Street and Seacoast Drive should be employed as a measure to enhance public safety. In locations with a high volume of pedestrian traffic, crosswalks should use stamped concrete, brick or similar paving materials as an extra warning to motorists. Said stamped concrete, brick or similar paving materials should not impede or hinder the ability of bicycles to use designated bike lanes.

### **C-22 Parking**

Parking for both residents and visitors shall be provided as part of new development. Implementation actions shall include:

#### **a. Seacoast Drive**

The use of in lieu parking fees, off-site parking facilities and shared parking shall be encouraged for properties located west of Seacoast Drive

and on Seacoast Drive. The intent of this policy is to encourage a more pedestrian atmosphere near the beach and develop properties near the ocean with commercial and recreational uses rather than parking lots.

b. **Commercial/Mixed-Use Areas**

In lieu parking fees, off-site parking facilities, transportation demand management strategies, and shared parking may be used in commercial/mixed-use areas to facilitate mixed-use development, shared group parking, a pedestrian atmosphere, and/or improved design.

The consolidation of off-street parking for several uses shall be encouraged to improve walkability, allow for a more pedestrian-oriented environment, reduce the number of street ingress and egress points, and to facilitate well-designed, small-lot infill development.

c. **Residential Areas**

In lieu parking fees and/or off-site parking may be used for multi-family dwellings where it improves residential design as related to providing ground floor, street facing residential dwellings.

d. **Recreational Vehicles and Heavy Duty Trucks**

Recreational vehicles and heavy-duty trucks should generally be restricted from on street parking along local streets.

e. **Shared Parking**

Shared parking shall only be approved when technical evidence is presented to justify the shared use. The Urban Land Institute guidebook *Shared Parking* Second Edition (2005) shall be used as a guideline and supplemented by additional findings, where appropriate.

f. **Off-Site Parking**

Off-site parking when allowed under Policy C-22a, C-22b, or C-22c, above, shall only be permitted if a sign is posted indicating the offsite user, and is used exclusively for off-site use, and recorded by covenant. When allowed under Policy C-22a or C-22b, and within the commercial/mixed-use zones, the off-site parking shall be within 1,000 feet of the use. When allowed under Policy C-22c, the off-site parking shall be within 500 feet of the use.

g. **In-Lieu Parking**

In-lieu parking shall only be permitted when it can be demonstrated that the in-lieu fee is sufficient to provide off-site parking and the City has developed a program for such off-site parking. This program shall require an LCP amendment.

h. **Detailed Parking Standards Shall Be Included In the Zoning**

## **Ordinance**

Per the City of Imperial Beach Zoning Ordinance, parking standards for the commercial/mixed-use zones shall use the following guidelines:

- Commercial – C/MU-1 and C/MU-3 zones: 1 space per 500 gross sq. ft. of commercial use.
- Commercial – C/MU-2 zone: 1 space per 1,000 gross sq. ft. of commercial use.
- Multiple-family residential – C/MU-1, C/MU-2, and C/MU-3 zones: 1.5 spaces per dwelling unit.
- Hotel without cooking facilities – C/MU-1, C/MU-2, and C/MU-3 zones: 1 space per guest room.
- Hotel with cooking facilities – C/MU-1, C/MU-2, and C/MU-3 zones: 1.5 spaces per guest room.

In the commercial/mixed-use zones, parking reductions, shared-parking, waivers, or other strategies may be employed in order to facilitate pedestrian oriented activity and mixed-use development, and shall be subject to Policies C-22b, C-22e, and C-22f.

For all other zones, the standards shall use the following guidelines:

- Residential: 1.5 to 2.0 spaces per dwelling unit.
- Hotel/Motel: 1 space per guest room.
- Commercial: varies from 1 space per 50 sq. ft. to 1 space per 300 sq. ft. of building.
- Bars and restaurants: 1 space for each 75 sq. ft. of net floor area, plus 1 per 2 employees at largest work shift.

i. **Shared Public/Private Parking**

Where feasible, public use of private parking facilities currently underutilized on weekends and holidays (i.e., serving office buildings) shall be permitted in all commercial zones located within ¼ mile of the beach.

j. **Balanced Development**

All new commercial and higher density residential development shall be located and designed to facilitate provision or extension of transit service to the development to the extent feasible. Residential, commercial, and recreational uses should be located in relationship to each other so as to encourage walking, bicycling, and transit ridership. Major employment, retail, and entertainment districts and major coastal recreational areas should be well served by public transit and easily accessible to pedestrians and bicyclists.

k. **Employer Support of Transit**

The City shall actively encourage convenient alternatives to automobile

use throughout the Commercial Districts by requiring employers to provide incentives for alternative transit use such as providing employee transit passes or subsidies, ridesharing programs, preferred parking for carpooling and on-site shower facilities.

# CONSERVATION AND OPEN SPACE ELEMENT

*A city where one cannot walk of an evening into the open, wherein millions live and die without seeing the spring flowers and the June foliage and the autumn harvest, from year's end, is an incubus (nightmare) of civilization.*

*Frederic Harrison*

*The Meaning of History*

## INTRODUCTION

California Planning Law requires the General Plan to include both a Conservation Element and an Open Space Element. Because these elements are so interrelated, they have been combined for the Imperial Beach General Plan. In addition, it is intended that this Open Space and Conservation Element serve as the Water and Marine Resources and the Environmentally Sensitive Habitat Areas components of the Imperial Beach Local Coastal Plan.

Open space and conservation planning is a basic element of the Imperial Beach General Plan. From the standpoint of actual physical patterns and form, these Elements can be viewed as coordinating and guiding decisions related to the land and water areas which influence and shape the quality of the City. The Open Space and Conservation Element takes into consideration those open space areas necessary for the preservation and conservation of various natural resources, for outdoor recreation, for the enjoyment of scenic beauty and areas of historic/cultural value, and for the protection of public health and safety.

In preparing the Open Space and Conservation Element, an inventory of various open space and conservation components was completed. This inventory is included in the Appendix to the Plan.

## BACKGROUND

Natural resource topics are discussed in alphabetical order in the following fourteen categories:

### **Air Quality**

Air pollution falls beyond the limits of control of any one jurisdictional authority. While there are certain actions which can be taken locally, positive control of air pollution requires a coordinated program including Federal agencies, the State government, all general-purpose governments, and many of the special purpose districts in the air basin.

### **Beach and Coastline**

Imperial Beach is unique in that it contains an estuary as well as approximately three and a half miles of coastline. The interrelationship between the Tijuana River and the ocean is very crucial. Interference with natural processes in the past has resulted in the alteration of that interrelationship which has caused severe beach erosion.

The Imperial Beach coastline is part of the Silver Strand Littoral Cell, which is a segment of coastline involved in the complete cycle of littoral transportation and sedimentation. Under natural conditions, a littoral cell is supplied with sand and sediment by rivers and streams that flow into the ocean within the limits of the cell. The sandy material is brought to the coast by wave action and is transported along the coast until it is ultimately intercepted by a submarine structure, such as a canyon or sink, and the sand is diverted offshore and lost to the near shore environment.

The Silver Strand Littoral Cell extends along twelve miles of coastline and has the Tijuana River as a sand resource, Silver Strand as a transport path, and the entrance to San Diego Bay with its strong ebb and tide currents as a temporary deposition area. It is estimated that the Tijuana River supplied 660,000 cubic yards of sand per year under natural conditions.

The damming of the Tijuana River upstream (Rodriguez Dam) has resulted in the littoral cell's loss as a sand resource. Thus, in the absence of a continuing sand supply, the northward littoral transport of sand along the Silver Strand has resulted in an erosion cycle that originates at Imperial Beach in the southern part of the cell and progresses northward (see the shoreline protection sections of the Safety Element for further discussion).

### **Climate**

Imperial Beach enjoys an excellent, comfortable climate throughout most of the year with an annual precipitation average of 9 to 10 inches per year.

### **Drainage (See Facilities and Services Element)**

### **Geology (See Safety Element)**

### **Historical and Archaeological Resources**

A review of archaeological and historical records for the Imperial Beach area indicates that there are presently no identified historical or archaeological sites of major importance. Several minor sites have, however, been identified; the largest of which

covers approximately ten acres along the Otay River channel along the northern City boundaries. Two smaller sites also have been recorded in the same general area along the farthest southern reach of the San Diego Bay. For the most part, these identified sites are composed of the remains of shellfish gathering activities, and associated discarded tools. No evidence of permanently inhabited villages have been found to date. All three sites in the northern part of the City are currently heavily impacted by existing urban uses. Another site has been located and excavated at the far southern end of Imperial Beach at Borderfield State Park. All these sites appear to be associated with the Early Milling La Jolla culture, which dominated the South Bay area between 7000 and 5000 years ago. Other sites have reportedly been encountered near the Oneonta Slough during construction activity, although it is not known whether steps were taken to preserve the reported sites or whether it was in fact a true archaeological site.

In terms of historical resources, there appears to have been a cavalry post on the present site of Westview Elementary School. There is also photographic evidence that at one time a "wave-action" device was constructed at or near the municipal pier. The purpose of this device was apparently to harness the energy from the waves falling to shore.

### **Open Space**

Most of the open space in the City consists of public lands, which are described in the Parks, Recreation and Access Element. Other open spaces include:

#### **The San Diego-Eastern Arizona Railroad Right-of-Way**

This right-of-way located at the northern boundary of the City was originally dedicated in 1876 as an 80 to 120 foot wide, by .9 mile long strip of land. In 1912, the San Diego-Eastern Arizona Railroad obtained part of the right-of-way for a line to transport people from San Diego to the Hotel Del Coronado and back. This easement has a great potential of becoming a recreational corridor including bicycle and pedestrian routes.

#### **Ream Field (U.S. Navy Outlying Landing Field)**

This facility is used primarily to train helicopter pilots. The base may be phased out in the undetermined future. The entire 597-acre base cannot be classified as open space since the northern portion is improved with a number of structures in addition to the runways. The southeastern portion of the base has, however, been left in its natural state, and is part of the Wildlife Refuge.

#### **Salt Evaporation Ponds**

This open space located at the southern end of San Diego Bay, is owned by the Western Salt Company and is part of their salt manufacturing facilities.

### **San Diego Bay**

Imperial Beach is bounded on the north by the South San Diego Bayfront. Almost all of the open land on the bayfront has been developed and there is little reminder of the

Coastal Sage/Maritime Sage vegetation, which once occupied the area. The Western Salt Company has developed portions of the salt marsh on both sides of the Otay River channel located on the City/Bay boundary. This facility consists of evaporation ponds used in salt production. A portion of the old San Diego and Arizona Eastern Railway owned by MTDB can be found along the northern edge of the bay area adjacent to the Otay River channel. There are few opportunities for full deepwater bay access from the Imperial Beach portion of the South San Diego Bayfront.

## **Soils (See Safety Element)**

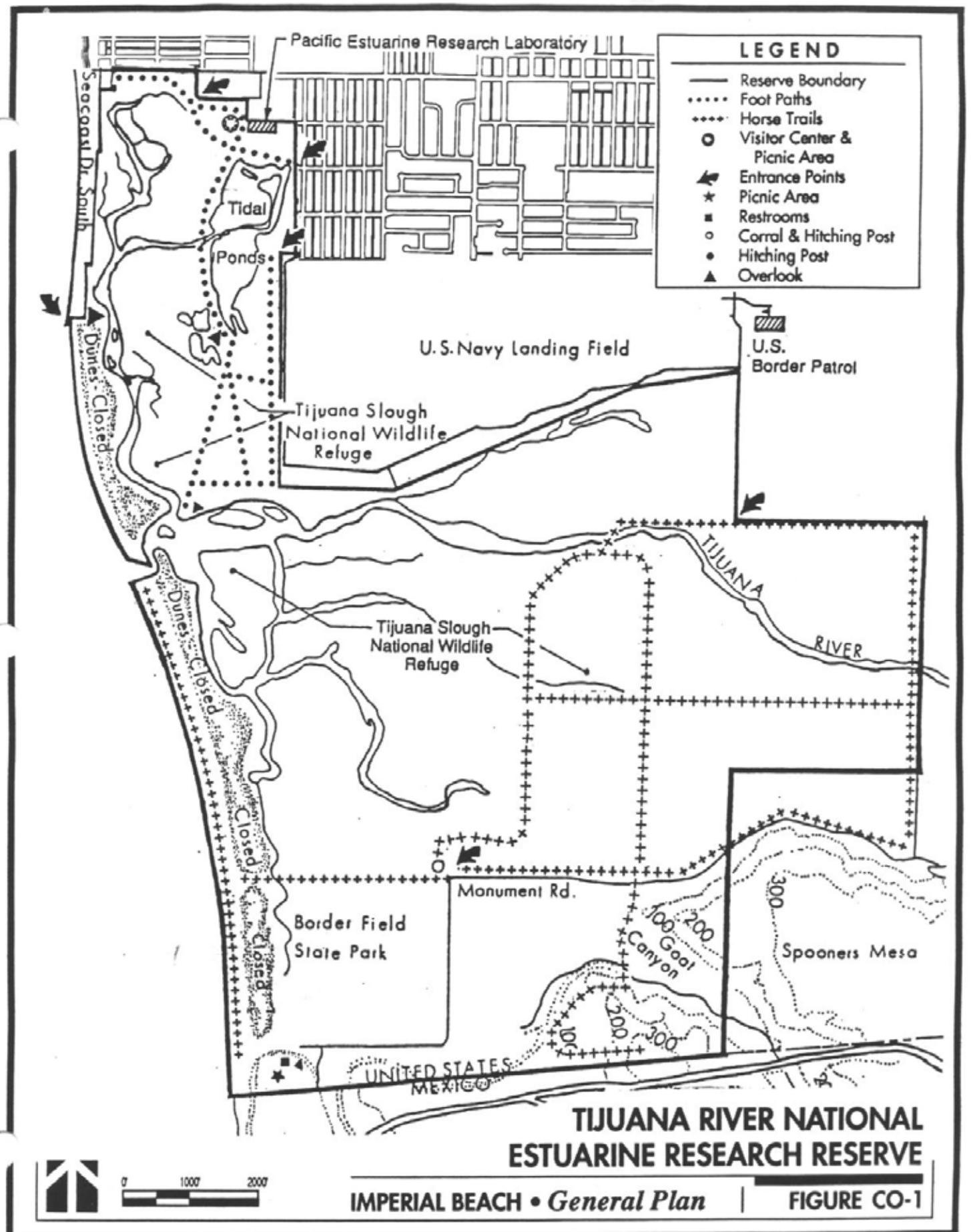
### **Tijuana River Estuary**

The Tijuana River Natural Estuarine Research Reserve (TRNERR) as shown in Figure CO-1, is located in the Southwestern most corner of the United States. It represents about 2,531 acres in the lower sections of the Tijuana River watershed. Approximately 928 acres are located within the City limits of Imperial Beach. The remaining acreage is within the jurisdiction of the City of San Diego. The TRNERR Management Authority is vested with the responsibility for setting management policies for the whole Reserve. TRNERR includes the Tijuana Slough National Wildlife Refuge, which is managed by the U. S. Fish and Wildlife Service, and Border Field State Park, which is managed by the California Department of Parks and Recreation. In addition to the Wildlife Refuge and the State Park, the TRNERR boundary also contains land owned by the U.S. Navy, the City of San Diego, the County of San Diego and privately held parcels.

The TRNERR contains a highly variable system that may best be termed an "intermittent estuary." It is a coastal body of water that is influenced by both marine and river waters. During the winter-wet season, its waters are diluted by rainfall and stream flow, while during the rest of the year; it is an extension of the ocean. It supports a range of natural plant and animal communities that are especially adapted to withstand the variable salinities that occur when sea and fresh waters mix and provides habitat for a variety of rare and endangered species.

The Reserve has been ecologically influenced by its highly variable environment, which is very much a function of both its watershed and adjoining land uses. Land management practices on both sides of the border have greatly influenced the quantity and quality of water entering the estuary.

Eight major natural habitats exist within the TRNERR. They include transition from upland to wetland, riparian salt marsh, salt panne, brackish marsh, estuarine channels and tidal creeks, intertidal flats, and dunes and beach. The estuary has been substantially altered by catastrophic events and human disturbances. However, with the exception of the brackish marsh habitat, which appears to be directly dependent on urban runoff, most of the habitats present today represent variations on what existed at the turn of the century.



In February of 1986, a Management Plan was adopted for the estuary. Protection of the resources and the improvement of the overall health of the ecosystem were given highest priority. Compatible multiple use of the land, public education and management-oriented research programs were other important objectives. The California Department of Parks and Recreation was identified as the lead agency with responsibility for implementing on-site programs in collaboration with the U.S. Fish and Wildlife Service. The plan includes the following six program areas: resource protection, research, interpretation, land acquisition, facilities development and administration.

As part of this program, a Research Facility and Visitor Center for education and interpretation has been constructed. In addition, trails have been built and signs posted for the public. In the future, there are plans to construct low post and wire barriers along the trails to prevent accidental incursions into the more sensitive areas of the Estuary.

### **Topography**

Imperial Beach is characterized by relatively flat topography compared to the rest of the San Diego region. There is, however, some vertical relief, with the highest ground level in the urbanized area laying at forty-five feet above sea level. Most of the area lies at less than thirty feet above sea level. The extreme southern end of the City has bluffs which rise to approximately fifty feet above sea level. Some natural dunes exist along the beaches and are most pronounced in the estuary area. Surface drainage is generally to the west, towards the ocean, and to the north, towards San Diego Bay.

### **Vegetation**

Imperial Beach can be divided into two general areas: (1) the urbanized area, and (2) the undeveloped area.

Little natural vegetation is present in the urbanized area. The domestic vegetation consists of landscaping, mainly ornamental trees, some street trees, shrubbery and a variety of ground covers. Most of the landscaping can be found on private property. Landscaping on city streets, school grounds and playgrounds is conspicuously lacking which is most evident along major streets, in the commercial areas and in the beach area.

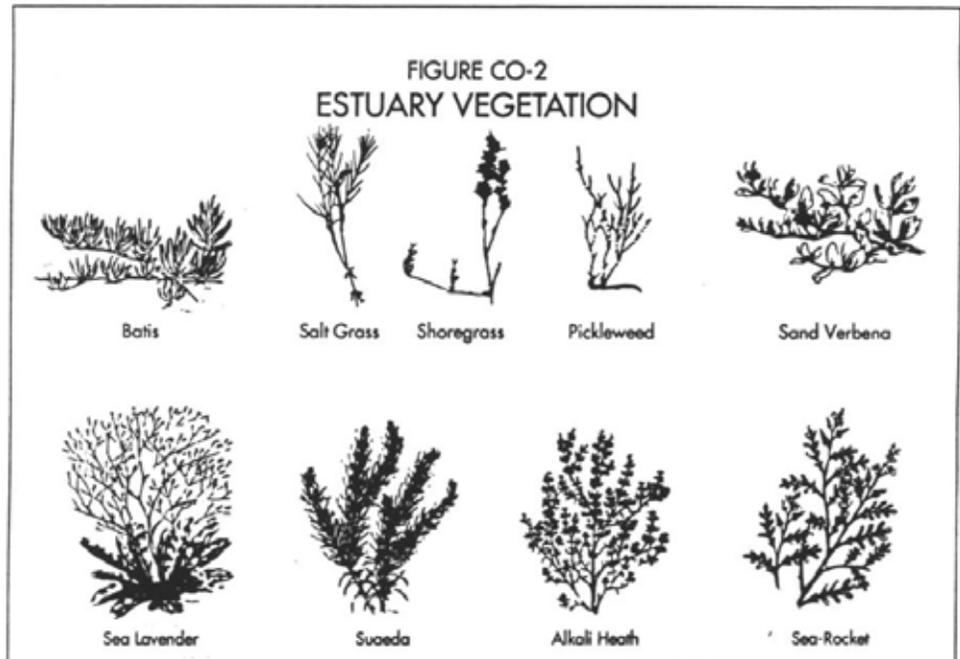
In that the Tijuana River Estuary occupies most of the City's undeveloped land and is still in its natural state, the native vegetation that exists is abundant, life supporting and in some cases very unique (see Estuary discussion and Figure CO-2).

### **Water Resources**

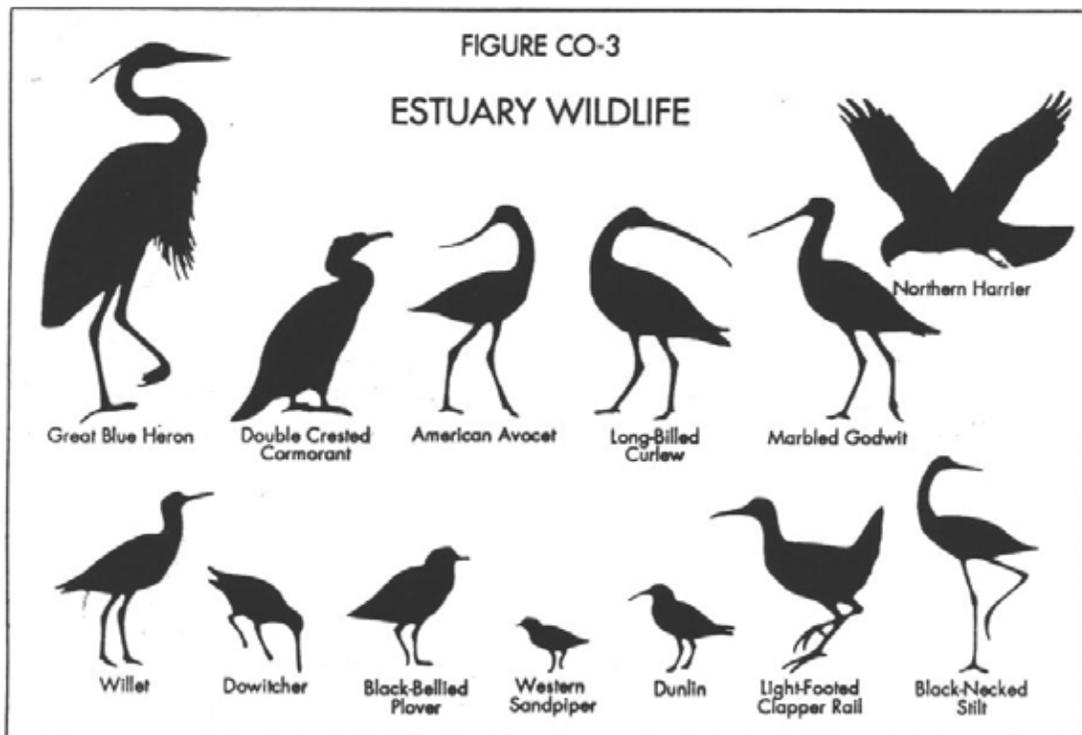
The City has experienced beach pollution problems as described under Wastewater Services in the Facilities and Services Element. Groundwater has been rated as inferior for both domestic and irrigation use due to a high content of dissolved solids and high sulfate levels. The water table in the City is relatively high (twenty five feet or less). Domestic water is provided by the California American Water Company (see the Facility and Services Element).

## Wildlife

Imperial Beach can be divided into two open areas: (1) the urbanized area, and (2) the undeveloped areas. Because of the urbanized nature of the developed area of the City, existing significant wildlife habitats within such areas are nonexistent. The types of wildlife that do exist are those that have adapted to, or are compatible with, urbanization and do not have to compete with man for survival.



The undeveloped area primarily consists of the Tijuana River Estuary that includes significant Wildlife as illustrated in Figure CO-3.



# GOALS

## GOAL 2 NATURAL RESOURCES - KEY FOUNDATION OF THE CITY

The ocean, beach, bay, estuary, weather and related ecosystems set much of the image of Imperial Beach. Conservation and protection of these resources shall be a key focus of the General Plan. The unique physiographic characteristics of Imperial Beach are recognized as the foundation for all other aspects of the community. These characteristics enhance the quality of life of residents and visitors and shall not be wasted, destroyed, or neglected. They are generally nonrenewable and provide many of the scenic, historic, economic, recreation, open space and ecological values for the community.

## GOAL 3 RESOURCES AND OPEN SPACE BELONG TO EVERYONE

Imperial Beach is an integral part of the larger California coastal community, linked by shared resources that are prized by the state, national and even international community. Congenial and cooperative use of these resources by both residents and visitors is recognized. Solutions for cooperative use shall always be based on retaining the area's resources.

# POLICIES

## CO-1 The Beach

Imperial Beach has few industries and must, therefore, rely on the attraction of tourists for economic development. The beach area is most critical and the City should:

1. Designate the beach as open space.
2. Retain public ownership of the beaches.
3. Insure continued public access to beaches and, where possible, provide additional access, as well as increased public parking opportunities in the beach area (see Parks, Recreation and Access Element).
4. Require landscaping of properties near the beach area to attain a pleasant visual image.
5. Assure continued replenishment of sand.

## CO-2 Ocean Water Quality

The City should continue to work with the U.S. and Mexican governments and the City of San Diego in order to eliminate the beach pollution problems.

## CO-3 Landscaping

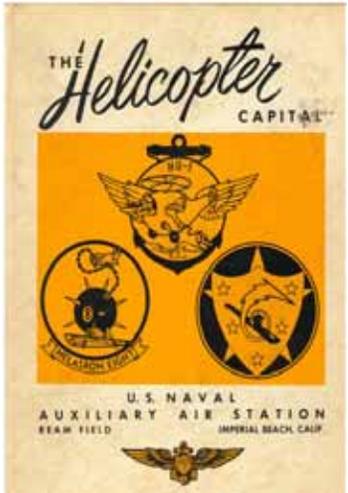
The City should develop and maintain an active civic landscaping plan. Such plan may include for example:

- a. Allocating funds in the annual budget for the landscaping of street medians and parkways, and funds for maintenance thereof.
- b. Developing priorities for landscaping projects to which annual budgets are keyed.
- c. Investigating outside sources of funding for landscape improvement projects and subsequent maintenance.
- d. Developing a list of plant materials (especially trees) most suitable to the City of Imperial Beach in terms of cost, form (preferably tall, broad form and densely foliated), hardiness, maintenance and aesthetic value.
- e. Preparation of a tree preservation ordinance.

#### **CO-4 Ream Field**

Ream Field should be designated as an "urban reserve" until such time as the Department of the Navy plans to dispense of the site. Future plans should include recognition of the open space and habitat resources of the site.





### **CO-5 Estuary**

The City recognizes and supports the importance of the Tijuana River Natural Estuarine Research Reserve both for its ecological and open space values. In this regard, the City shall:

- a. Assist in the implementing of the Estuaries Resource protection program, which includes the following development restrictions:  
"A buffer area will be established for each development adjacent to wetlands. The width of a buffer area will vary depending upon an analysis. The buffer area should be a minimum of 100 feet unless the applicant can demonstrate to the satisfaction of the State Department of Fish and Game and U.S. Fish and Wildlife that 100 feet is unnecessary to protect the resources of the habitat area. If the project involves substantial improvements or increased human impacts, such as a subdivision, a wider buffer area may be required. For a wetlands the buffer area should be measured from the landward edge of the wetland."
- b. Coordinate and control as appropriate the urban run-off into the Estuary.
- c. Encourage the acquisition of the 1.5 acre vacant triangular shaped property on the east side of South Seacoast Drive and adjacent to the National Wildlife Refuge as an expansion of the Refuge. This site could be an ideal location for viewing the Refuge.

### **CO-6 Air Quality**

The City shall support actions to insure clean air including but not limited to:

- a. Support the control of various industrial and commercial endeavors within the City through regulations applying to stationary sources of air pollution. The City shall remain cognizant of State and local regulations applying to such sources and shall require the submission of all applications to the Air Pollution Control District for approval prior to the issuance of local building

or engineering permits.

- b. Support the control of various industrial and commercial endeavors within the City through the issuance of permits and land use permit procedures to the extent of scheduling the incorporation of new and improved air pollutant control devices.
- c. Support the efforts of the Air Pollution Control District to maintain the constant surveillance of all permit holders and installations within the City. The City should establish a formal complaint process for local residents and periodically advise of and encourage its use. Complaints will be recorded and forwarded to the Air Pollution Control Board for formal action. The process should handle both physical, odoriferous, and noise pollution cases. A system of follow-up procedures on any Board actions shall be established. Reports to the initiators on actions taken will be made, as well as reports to the total citizenry through news publications.
- d. Encourage the development and use of emission reduction equipment for private and commercial vehicles. The City shall encourage operators of vehicular fleets using City streets to use lower weight or horsepower or low emission vehicles whenever feasible. The City shall strive to set the example by purchasing such vehicles for its own use whenever feasible, or converting existing vehicles to meet such standards.
- e. Pursue the development of alternative means of transportation, which would reduce the use of the automobile within the City. The development or licensing of any future public transportation system should be limited to the use of the most advanced low or non-emission powered vehicles. Transportation by means other than motor vehicles shall be encouraged (see also Circulation Element).
- f. Encourage surrounding communities to join in a total campaign to maintain a high standard of air quality in the southern San Diego County area. Joint agreements with their governing bodies and the San Diego County Board of Supervisors should be developed. Programs and program results should be highly publicized in the local news media in order to gain the support and cooperation of all citizens living in the area.
- g. Continue to review all new developments to ensure that they meet acceptable air quality standards as set forth by the State and local Air Pollution Control District, preferably through the environmental assessment process.

#### **CO-7 Urban Water Run-Off**

The City shall develop a system of managing urban runoff and floodwaters to curtail pollution in the beach area, the Tijuana River Valley, and San Diego Bay.

### **CO-8 Wetlands**

The diking, filling, or dredging of open coastal waters, wetlands, and estuaries, shall be permitted only where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to those uses specified in Section 30233 of the Coastal Act.

### **CO-9 Water Quality and Watershed Protection**

The City shall support actions to ensure water quality and watershed protection including but not limited to:

- a. To the extent feasible, preserve, and where possible, create or restore areas that provide water quality benefits, such as riparian corridors and wetlands, and promote the design of new developments so that it protects the natural integrity of drainage systems and water bodies.
- b. Avoid conversion of areas particularly susceptible to erosion and sediment loss and/or establish development guidance that identifies these areas and protects them from erosion and sediment loss. These areas are characterized by steep slopes, highly erodible soils, and inability to revegetate after disturbance.
- c. To the extent feasible, minimize the amount of impervious surface and directly-connected impervious surfaces in areas of new development and redevelopment and maximize the on-site infiltration of runoff. Where this is not feasible, encourage runoff management practices that minimize the volume of urban runoff discharged to receiving waters.
- d. In watershed planning, pollution prevention should be the first priority, to be followed by source control (only when pollution prevention is not technologically feasible), and pollution control.
- e. Reduce pollutants associated with vehicles and increasing traffic resulting from development. Coordinate local traffic management reduction efforts with the San Diego County Congestion Management Plan.
- f. Implement the San Diego Association of Government's (SANDAG's) recommendations as found in the Water Quality Element of its Regional Growth Management Strategy.
- g. Post-development runoff from a site shall not contain pollutant loads which cause or contribute to an exceedance of receiving water quality objectives or which have not been reduced to the maximum extent practicable."

# DESIGN ELEMENT

*Communities should be planned with an eye to the effect made upon the human spirit of being surrounded by beauty instead of ugliness.*

*Thomas Jefferson*

## BACKGROUND

The Design Element is an optional General Plan topic under the State Planning Law. In addition to analyzing broad community wide design features, the Element also is important for protection of scenic and visual qualities of the City as required by the Coastal Act of 1976. Since State Planning Law does not require a Design Element, there are few imposed standards or guidelines and, thus, Imperial Beach has the utmost flexibility in adopting an element especially suited to its own needs.

The character of Imperial Beach's environment presents both special opportunities and special perils. The opportunity lies in the richness of the City's natural, coastal setting.

The peril lies in the fragile nature of Imperial Beach's environment and in the speed with which it can be destroyed. The community is located within the "square-shaped" confines of the San Diego Bay and Silver Strand; the Oneonta Slough and Tijuana River Estuary; and the Pacific Ocean, and one is always aware of the setting in a way that is not true of other areas. In such a restricted and exposed environment, it takes little in the way of inappropriate buildings, tangles of overhead wires or jumble of signs and lost views to create ugliness in the place of beauty.

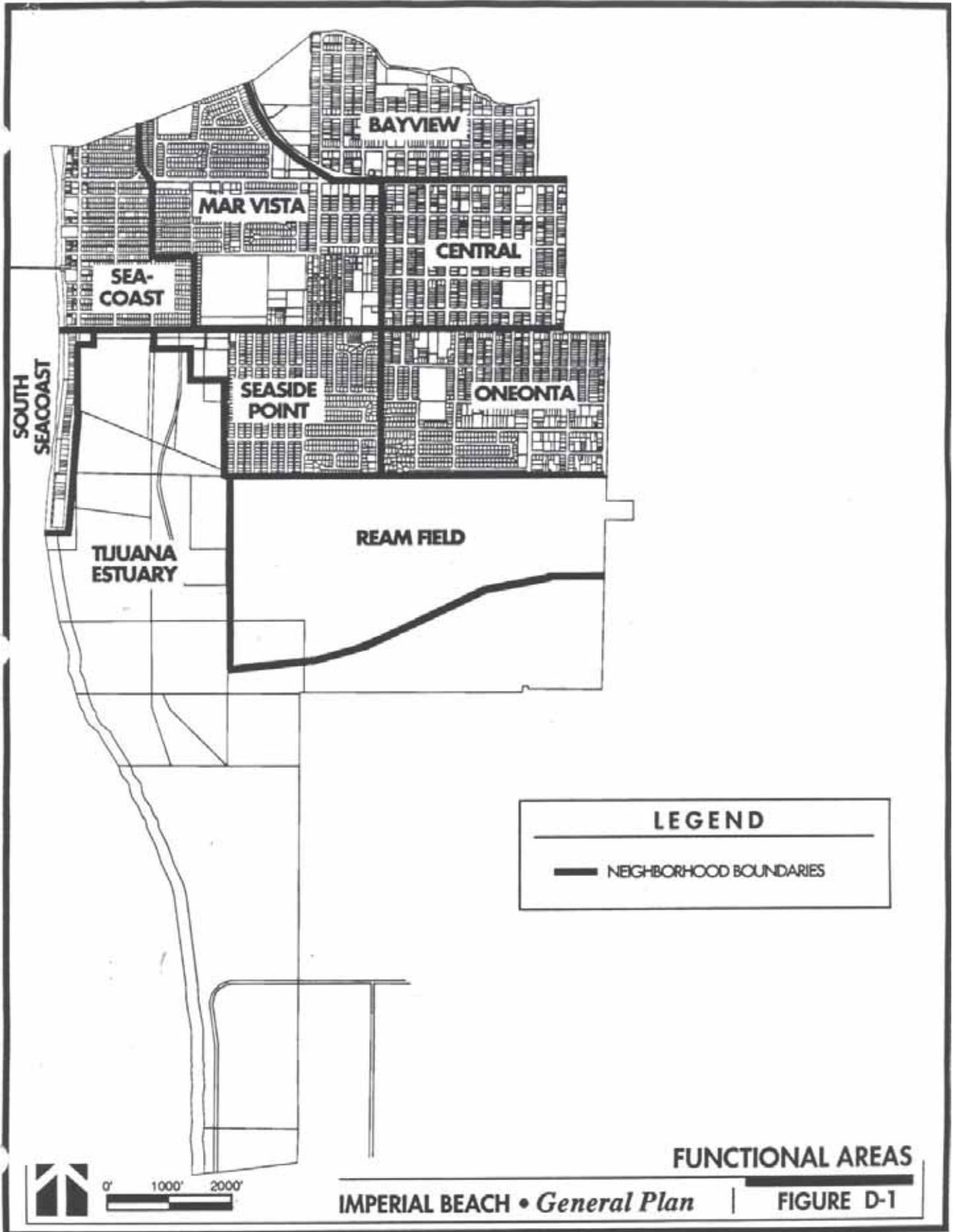
From an environmental standpoint, Imperial Beach has a number of unique qualities. These include a large number and variety of vistas and natural settings (i.e., from nearly all sections of the community there are panoramic views); a sense of terrain or location - that is an identifiable sense of enclosure created by the natural geography and a strong focal point in the Seacoast area, a strong pattern of development evidenced by the concentration of structures and circulation facilities and the existence of extensive open space.

The City pattern is a visual framework composed of the natural base upon which the city is developed. The pattern of Imperial Beach can be described in several ways. Some aspects of the City's pattern are two-dimensional as though it were a map; in other ways, the City's pattern is three-dimensional. The City pattern is not a rigid order, but rather a synthesis of diverse and even random features combining together to form a

sense of balance and compatibility.

In comparison with most urbanized areas in Southern California, Imperial Beach has a number of unique qualities. These include:

1. **A large variety of views and natural settings.**  
Generally, wherever one is located in Imperial Beach, there is a vista within close proximity. This may be an open vista to the Pacific Ocean, a panorama of surf and ocean, views of tidal infill at sunset or the sweeping view of the Playa de Tijuana skyline and Tijuana bullfight ring contrasting with the natural openness of the Tijuana River Estuary.
2. **A sense of place.**  
The natural elements of the terrain in Imperial Beach create an identifiable sense of enclosure, while a strong focal point is evident in the Pacific Ocean.
3. **A small-scale, man-made environment.**  
Vertically, Imperial Beach primarily consists of one or two story buildings. Horizontally, with a few important exceptions, the neighborhoods and functional areas of the City are generally compact and well defined. These neighborhoods and functional areas are shown in Figure D-1 and include:
  - a. The Seacoast area, which comprises the municipal pier and the City beach north of Imperial Beach Boulevard;
  - b. The linear beach front residential developments south of Imperial Beach Boulevard along Seacoast Drive known as the Seaview District;
  - c. The Tijuana Estuary District which encompasses the Tijuana River National Estuarine Research Reserve. Slough National Wildlife Refuge and Border Field State Park;
  - d. The Ream Field Naval Outlying Landing Field located south of Iris;
  - e. The Bayview District located north of Highway 75; and
  - f. The less well defined residential neighborhoods of Mar Vista, Central, Seaside Point and Oneonta.



**4. Linear Movement.**

While most Southern Californians spend a great deal of their time traveling long distances, the experience of linear movement within Imperial Beach is qualitatively different. In most Southern California communities, vehicular movement takes the traveler either through freeway environments at freeway speeds, or along cluttered arterial streets while alternating between moderate to high speeds and "stop-and-go" traffic. The movement usually takes place along routes that bear little relationship to surrounding natural or man-made environments. In Imperial Beach the major routes follow the same natural configurations that have determined other patterns of development, and generally it is possible to travel from one part of the community to another with relative ease.

**5. Extensive Open Space.**

The open space in Imperial Beach presents an extraordinary design opportunity not only because of its extent, but also because of its location and specific characteristics.

Visual and Scenic Resources specific to Imperial Beach include the following:

✓ **The Pacific Ocean**

The ocean is perhaps the most scenic resource in Imperial Beach. However, due to its almost limitless expanse, it is difficult to fully perceive visually. In the case of Imperial Beach and the Pacific Ocean, the statement that the best view is not always, or often, the full view, is applicable. The views of the Pacific Ocean in Imperial Beach can be enhanced if they are enframed or seen through an appropriate screen. The ocean is open space, a focus of major views, an attraction to visitors and a place of human activity.

✓ **The Tijuana River Estuary**

The Tijuana River Estuary offers one of the most unique scenic resources. The Tijuana River Estuary can be viewed from several vantage points, a few of which are the Mesa bluff-top in Border Field State Park, the southern terminus of Seacoast Drive and along Imperial Beach Boulevard.

Depending from which viewing station the Tijuana River Estuary is viewed, the perception of the area changes dramatically. This is due to the interplay of different visual aspects. Views from along Imperial Beach Boulevard focus on the Tijuana bullfight ring and Mesa Bluff-top area, which act as the terminal features of the vista. This terminal point sets the theme of the view; a vast expanse of open space separating two urban areas, in fact, two countries.

From the end of the Seacoast Drive, a different prospective of the Tijuana River Estuary is achieved. Here, the narrow waterways form a visual axis.

The axis, essentially, is a linear element transversing the view. The waterways, in fact, become the dominant feature. The perceived view is of a wet-land type habitat between the shore and inland development.

The final viewing point is the Mesa bluff-top of Border Field State Park. This spot, itself a terminal point of another vista, produces a reverse interest view. From the bluff-top, one views a panoramic coastline scene ranging from the beaches below, along the coast past the estuary to Imperial Beach and Coronado.

The Estuary and Slough define the boundary between the urbanized City and the natural undeveloped City. This space has had an influence on all the people of Imperial Beach, either as a recreational resource, a place to go for solitude, or as an environmental resource.

- ✓ **Ream Field**  
This represents a scenic resource in that it draws spectators to view the helicopters. This particular vista is ideally suited to passive recreational activities for many, while simultaneously representing a prime source of noise pollution to others.
  
- ✓ **The City Beach**  
A unique scenic resource, the City beach encompasses the area from the Northern City limits, south to the International Border. This area has numerous focal points ranging from the City Pier, to the variety of building types, to the sandy beach. Daytime views include the Coronado Islands, the beach itself, the ocean, the Silver Strand, Coronado, Point Loma, and Downtown San Diego. Nighttime views include lights on the pier, lights on the ocean, Point Loma, the Coronado Bridge, Coronado and Downtown San Diego.
  
- ✓ **Salt Evaporation Ponds and South San Diego Bay**  
The salt evaporative ponds act as the gateway to Imperial Beach as one enters into the City along State Highway 75 from either the Silver Strand area or from Interstate 5. Unlike the Pacific Ocean, these ponds are small enough to be easily understood visually. They serve as important gateways to the City. There are excellent nighttime views of the Coronado Bridge and Downtown San Diego.

# GOALS

## GOAL 4 VISUAL QUALITY IS IMPORTANT

The visual quality of the City's environment shall be preserved and enhanced for the aesthetic enjoyment of both residents and visitors and the economic well-being of the community. Development of neighborhoods, streets and individual properties should be pleasing to the eye, rich in variety, and harmonious with existing development. The feeling of being near the ocean and bay should be emphasized even when the water is not visible. Designs reflective of a traditional California seaside community should be encouraged.

## POLICIES

### D-1 Design Review

All residential properties of 2 dwelling units or more, all new mixed-use development, and all new non-residential structures shall be subject to design review.

### D-2 Design Guidelines

The City shall adopt design guidelines to be used in the design review process.

### D-3 Sign Program

The City shall develop a uniform public information sign program.

### D-4 City Image

Development should retain a low profile. Adequate provisions should be made in all types of development for specimen-sized trees to ensure the evolution of a green, tree-covered image for the City.

### D-5 Public Utilities and Facilities

Highly visible public improvements should be designed and landscaped to blend into their backdrop.

1. Major linear improvements, such as major roadways should be well landscaped.
2. Structures necessary to store, channel or hold back water should be designed and constructed of materials and colors so as not to draw attention to their alteration of nature. Where the purpose of the structure permits, it should be landscaped to aid in its camouflage.
3. Utilities which cannot be feasibly placed underground due to their high voltage or other safety or cost considerations should be located and

designed in such a fashion as to provide the least visual and environmental impact on the community.

#### **D-6 Trees**

Mature trees, tree masses and tree rows of significant aesthetic or historic quality should be preserved when and wherever possible consistent with the public safety.

1. Public and private projects should be planned in such a manner that significant trees will not be destroyed when preservation is economically realistic and consistent with sound planning and horticultural practices.
2. Provisions should be made to protect the City's most significant landmark trees, tree masses and tree rows on a permanent basis and not just at the time of project review.
3. The planting of additional new trees throughout the City should be encouraged.

#### **D-7 Signs**

The City should regulate signs in a manner which will emphasize safety, help improve and protect the appearance of buildings and the City as a whole, foster legible graphics and promote the public's awareness of the business community while respecting the City's suburban character.

1. Signs should be restrained in character and no larger than necessary for adequate identification.
2. Information bits should be limited and design and colors chosen to ensure legibility to passing traffic.
3. A sign should relate in message, location and character to the business conducted or product offered at that site.
4. Signs should relate in character, material, size, shape, height, placement and color to the sites and buildings of which they are a part.
5. Pole signs and roof signs shall be prohibited.
6. Monument signs shall not exceed 8 ft. in height.

#### **D-8 Project Design**

- a. The design of development projects should respect, work with and enhance the natural features of the land.
  - Natural scenic amenities such as mature trees; watercourses and

views should be integrated into the project design

- Structures should be oriented and constructed so they may take advantage of the beneficial features of the climate and be protected from the negative ones in order to reduce energy consumption and increase the enjoyment of the residents.
- b. Projects should be designed so there is a harmonious relationship with adjoining uses.
- The pattern of existing neighborhoods should be respected. A development should be integrated with the adjacent neighborhood if the project size or natural boundaries dictate, or the design should create one or more separate and strong neighborhood identities.
  - Structures should relate to neighborhood structures both within and adjacent to the development and not create a harsh contrast of scale, style or color.
  - Areas of noisy activity and areas of quieter use should be separated by space or buffers, both within and between projects.
  - Lighting and signs should be designed, located and directed so as not to disturb adjacent uses.
  - Where 3- or 4-story structures are developed adjacent to existing 1- or 2-story structures, the new development shall be designed to respect the scale of the 1- and 2-story structures. Such designs could include a wider side yard setback for the 2<sup>nd</sup> and 3<sup>rd</sup> story, hip roofs, or similar features. Within the commercial/mixed-use areas, such scale-reducing design features could include varying wall planes, setbacks, and upper-story stepbacks that reduce overall massing and provide roof treatments that are complementary to adjacent properties.
- c. Developments should be designed to respect and enhance the view and safety of the passerby.
- Structures and open space areas should be arranged so that open space qualities of a development are apparent from outside the development.
  - Public rights of way should be designated not only for the safety and enjoyment of the motorist, but also for the pedestrian, jogger and bicyclist.

- In commercial and mixed-use developments, safe and enjoyable browsing by customers should be encouraged by coordinated and attractive signs, walkways, patios, display windows, and entrances. Optimally, the entrance to such an enjoyable area should be designed to be obvious to the passing motorist and pedestrian, and be linked to the public sidewalk and the parking area. Parking lots should be attractively landscaped and safe for the motorists and pedestrians walking from their cars or the street.
- d. Developments should attempt, through design, to give the appearance of a suburban density and scale.
- Monotonous designs appear denser than ones of equal density, which are varied. Therefore, the following should be given consideration:
    - Uniformly repetitious buildings and modules and unbroken expanses of wall should be avoided.
    - Balanced and coordinated variety in height, materials and color should be encouraged.
    - Setbacks of buildings should be varied. Additionally, stepbacks should be considered where transitions occur between mixed-use development and single-family residential
    - Simple palettes of landscape materials used in masses to compliment or screen various parts of the building(s) and achieve a park-like setting are recommended.
  - The size and design of signs, walkways and parking area lights and other elements of development should be low keyed, but effective in scale, color and brightness.
- e. Developments shall be designed with an eye to safety without giving the appearance of a fortress or a sea of concrete or asphalt.
- Parking lots along Seacoast Drive, Palm Avenue, and Imperial Beach Boulevard shall have internal landscaping to visually break the hard lines of the parking lot.
  - Buildings should be grouped into "neighborhoods" or clusters and be oriented so that building entryways are visible to encourage neighborhood surveillance.

- Where separate units face onto a common open space, the design should relate specific portions of the open space to each unit. This has been shown to increase individual responsibility for surveillance as well as upkeep.
  - Parking areas should be designed to separate vehicles and pedestrians whenever possible and ensure adequate visibility when the two must cross.
  - Curbside visible street numbers or directory maps should be provided for all types of structures and be visible at night for the convenience of police, fire, guests and customers.
  - Open space for passive use should be provided in all developments. In lower density areas, these are generally yards or patios; in medium or higher density developments; interior courts, patios or roof gardens would be appropriate.
  - Recreation space, appropriate to the type of development, landscaping, including the preservation and planting of large trees and open space, should be provided to ensure a pleasing and open landscaped vista to the residents and passersby and to promote a tree-covered City image.
- f. Developments shall be designed to conserve energy and water and work toward healthful air quality.
- New developments shall incorporate energy-saving design features such as appropriate building and roof orientations and architectural features, reduced glass area where appropriate, adequate insulation, heat efficient spaces and arrangements, solar and wind energy capturing systems and energy efficient utilities and appliances.
  - Water-saving systems shall be used in developments as technology and economics make them feasible. These include drip irrigation and low water use appliances and fixtures.
  - Project design shall encourage the use of mass transit. This may include the clustering of units and the provision of bus shelters/benches, turnouts, schedule signs and sidewalks.
- g. Residential developments should include and provide for a number of amenities such as adequate storage areas, usable private outdoor areas, indoor and outdoor common areas, landscaped areas and park and

recreation areas as appropriate to the needs of the residents and the types of units.

- h. Developments shall be designed to protect water quality and provide for watershed protection.
- New development and redevelopment shall minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment and where feasible slow runoff and maximize on-site infiltration of runoff.
  - New development and redevelopment shall implement pollution prevention methods supplemented by pollutant source controls and treatment through the use of small collection strategies located at, or as close as possible to, the source to minimize the transport of urban runoff and pollutants offsite and into the storm water sewer system.
  - Prior to making land use decisions, utilize methods available to estimate increases in pollutant loads and flows resulting from projected future development. New development and redevelopment shall incorporate structural and non-structural Best Management Practices (BMPs) to mitigate the projected increases in pollutant loads and flows.”

#### **D-9 Commercial/Mixed-Use Zones Design Guidelines**

All development within the commercial/mixed-use zones shall be subject to the Commercial/Mixed-Use Zones Design Guidelines, per the City of Imperial Beach Zoning Ordinance, which provides specific direction for achieving high-quality, pedestrian-oriented, mixed-use retail and commercial areas.

Adherence to the Commercial/Mixed-Use Zones Design Guidelines shall be in addition to adherence of other applicable design guidelines and standards, including the Landscape Design Guidelines for Seacoast Drive.

The development of additional, detailed design guidelines, standards, and criteria, should be considered for all commercial/mixed-use areas, and should provide specific direction as to the design quality and image desired by the community.



median islands in an attractive manner.

- Other special landscaping and design features employed at major focal points such as major intersections.
  - The use of custom street furniture and lighting fixtures, which support the architectural character and quality of the community.
- b. A reduction in the spacing of trees along parkways or in median islands as the street approaches more developed areas would serve to announce a reduction in automobile speed and provide more continuous shade as pedestrian and parking considerations become more important.
- c. Trees along the major streets should conform to or compliment those used in the adjoining properties so as to extend the visual relationship among adjoining landscaped areas. The use of similar foliage colors and/or textures would also serve to emphasize such relationship.
- d. Some ordered control over the spacing and design of signs along all major entryways should al-so be established. Public safety and directional signs should be simple, clear and concise.
- e. The City shall pursue, through cooperative efforts with the City of San Diego, the removal of billboards along the entryways to the City.

# FACILITIES AND SERVICES ELEMENT

*We will strive for the ideals and sacred things of the city, both alone and with many; we will unceasingly seek to quicken the sense of public duty; we will revere and obey the city's law--; we will transmit this city not only, not less, but greater, better and more beautiful than it was transmitted to us.*

*Oath of the Athenian City-State*

## INTRODUCTION

The manner in which public facilities and services are provided in California jurisdictions, as well as the manner in which they are funded, has changed considerably in the past few years. Both population growth and technological changes have required a more regional approach to the planning and provision of some facilities and services that were once the exclusive concern of municipalities. At the same time, fiscal constraints and legislative actions have shifted funding methods from a reliance on the general obligation of taxpayers to a greater emphasis on requiring new development to "pay its own way." The Facilities and Services Element is a guideline to indicate future needs as the City continues to develop. Funding to meet these needs will come from a variety of sources that must be considered in the capital improvement planning process and the annual budget process.

The location of existing public facilities is indicated in Figure F- 1. Most of Imperial Beach's public facilities and services will adequately meet the needs of the General Plan with a few desirable upgrades.

In the following discussion, not all services and facilities are under the direct control of the City. However, the policy commitments of the City greatly affect the ability of other agencies to provide appropriate levels of service to Imperial Beach residents and visitors. Circulation, parks and recreational facilities are not included in this Element since they are discussed in the Circulation Element and the Parks, Recreation and Access Element of this Plan.

Topics are arranged alphabetically and each section contains background and policies. Specific topics are:

**City Yard  
Civic Center  
Fire & Emergency Services  
Law Enforcement  
Library Services**

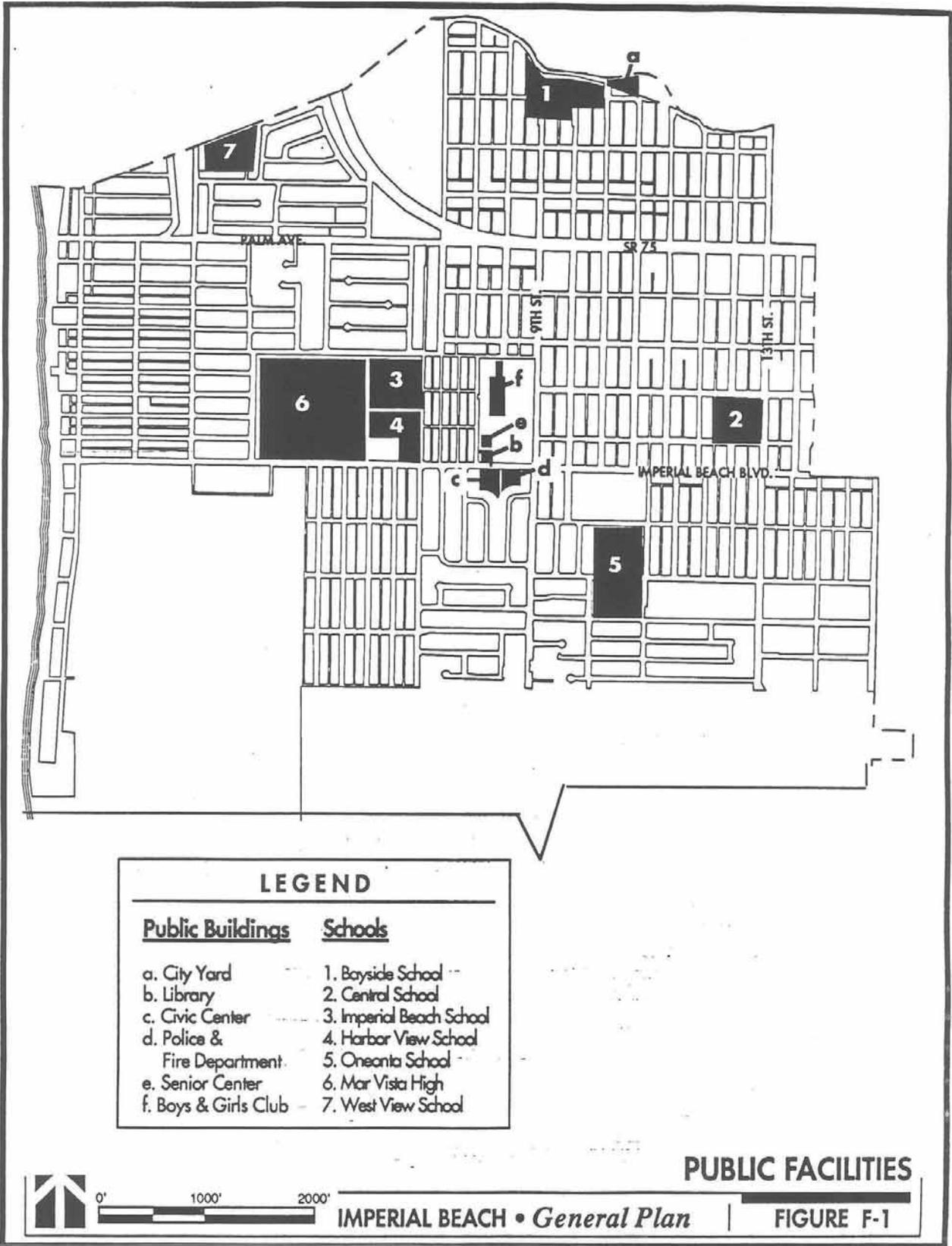
**Public Right-of-Ways  
Schools  
Solid Waste Disposal  
Wastewater Services  
Water Services**

## **GOALS**

### **GOAL 5 - FACILITIES AND SERVICES CONCURRENT WITH NEED**

The City shall ensure that public facilities and services are available to adequately serve all new and existing development concurrently with new construction. For existing facilities requiring upgrading and/or replacement, the City shall plan for adequate funding of these improvements to preclude interruptions or deterioration of service that may imperil the health and welfare of the residents and visitors to Imperial Beach.





# POLICIES

## **F -1 Development Impact**

New development in the City shall pay its own way.

## **F-2 Capital Improvement Planning**

In order to effectively plan and budget for needed facilities and the upgrade of service deficiencies, the City shall annually update the five-year Capital Improvement Plan.

## **F-3 Public Facility Locations**

Public utilities and public works facilities, which are not dependent on the ocean or bay, shall be located away from the ocean or bayfront to the extent possible. These facilities should be screened from public view and shall be designed in a manner that is compatible with surrounding land uses.

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# CITY YARD

## **Background**

The City Yard is presently located on Cherry Avenue between 10th and 11th Streets on the South San Diego Bayfront. These facilities house the City maintenance and operations, personnel and equipment. The fully developed site is approximately 1.79 acres. Although the facilities are adequate, they do not need to be located on a bayfront site.

## **Policies**

### **F-4 Relocate City Yard**

The City shall consider relocating the City Yard to a non-bayfront site. Alternatives include, but are not limited to:

- Ream Field.
  - Sites outside the City limits.
  - Splitting the yard into more than one site.
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# CIVIC CENTER

## **Background**

The majority of municipal facilities of the City of Imperial Beach, including the Sheriff's station, Fire department, City Council chambers, City Hall conference center and

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Administrative offices are located in the Civic Center complex on Imperial Beach Boulevard. This complex consists of four separate buildings and related parking on approximately 2.7 acres. The existing size and location of the facilities are considered adequate for the City's staffing needs. Major deficiencies of the administration center include an inadequate heating system and lack of air conditioning.

## **Policies**

### **F-5 Retain Existing Civic Center Complex**

The existing Civic Center complex shall remain as Imperial Beach's focus for public service. As funds are available, any deficiencies in the complex should be addressed.



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## **FIRE AND EMERGENCY SERVICES**

### **Background**

Fire protection and emergency medical services are provided by the City of Imperial Beach Fire Department located in the Civic Center complex. This centrally located fire station is staffed by a total of twelve persons, including the Fire Chief. A minimum of three are on duty at all times. This provides adequate staffing for a single piece of fire fighting equipment. The facility, however, is equipped with two fire engines: a 1,500 GPM pumper built in 1993 for first line protection, and a 1983 pumper (1,500 GPM), which is kept for reserve. The response time throughout Imperial Beach is between three and five minutes.

There is an automatic aid agreement between the Cities of San Diego and Imperial

Beach. Using this program, responses to emergency calls are directed to the closest available unit regardless of the municipal jurisdiction. It provides for a "first alarm" response to structural fires consisting of the Imperial Beach pumper, plus a pumper and a 100-foot aerial ladder truck from the City of San Diego. This system is designed to reduce the response time for emergency calls, while allowing the cities to provide for an increased level of service without an increase in facilities or equipment.

There are several nationwide organizations which rate communities for fire insurance purposes. The rating system utilized for Imperial Beach is the Grading Schedule for Municipal Fire Protection designed by the Insurance Services Office. Imperial Beach is rated a Class 4 on a scale of one to ten with one being the best and ten the worst. Areas surrounding Imperial Beach are generally rated at 3's and 4's. A change in rating can reduce typical fire insurance policies from 5 to 10 percent.

The majority of calls to the Fire Department are for medical assistance. The Department's staff is trained to provide initial response as part of a countywide trauma system. Medical transportation is provided by paramedics from Hartson Medical Services, stationed in the Imperial Beach/South San Diego area.

## Policies

### F-6 Fire Rating

The City should explore ways to improve its fire rating at every opportunity. The goal should be a rating no higher than 4.



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## LAW ENFORCEMENT

### Background

The demand for law enforcement services in Imperial Beach is determined not only by the needs of residents but also by visitors to the City, particularly the beach area. As tourist activities increase, there may be a need for additional law enforcement activities.

The City contracts with the San Diego County Sheriff's Department for law enforcement. The Sheriff's office is located in the Civic Center complex. Approximately thirty officers operate from this facility and service the City of Imperial Beach and the unincorporated communities of Bonita, Lincoln Acres and Otay Mesa.

The City's contract is for two patrol units (24 hours a day). Eleven deputies are required for staffing of these units. In addition to the patrol units, the City also contracts for 2+ detectives, 3 community service officers (parking enforcement) and .5 special purpose officers (DARE program). The contract also provides for 2 four-wheel drive vehicles, 4 patrol cars, and 3 traffic vehicles (patrol cars with special features).

There is no accepted uniform standard for number of police per 1000 population. Additionally, there is no direct correlation between number of police and crime rates. Communities vary substantially based on density, characteristics of land use and other factors. Imperial Beach currently has approximately .62 sworn officers per 1000 population. This compares with a San Diego countywide average of 1.09.



The sheriff operates three shifts per day in Imperial Beach with a maximum of two patrol units per shift serving the City. One patrol unit serves Citywide. A second unit is known as the Beach Patrol and operates a four-wheel drive vehicle instead of a regular patrol car. The Beach Patrol operates three shifts a day for a total of 24 hours. Although the beach patrol responds to calls throughout Imperial Beach, its focus is on Seacoast Drive, Pier Plaza and the beach area. The funding for two of the three shifts for the Beach Patrol unit is provided by the San Diego Unified Port District. The average response time for priority calls Citywide is four minutes. Two traffic units are also provided to the City of Imperial Beach. One is a 7-day with relief traffic unit, the other a 5 day with relief unit. Additional law enforcement is provided by the Sheriff's F-7 involvement program, which is a volunteer patrol program consisting of retired persons trained for community protection and patrol assignments. Activities include: daily senior citizen safety checks, vacation property checks, and an "eyes on the road" patrol program. The Sheriff's office will continue to enhance and maintain this program.

San Diego County's overall crime rate for the 1992 calendar year was 65.7 reported

crimes per 1000 people. Reported crimes include homicide, rape, robbery, aggravated assault, burglary, grand and petty theft, and motor vehicle theft. Imperial Beach's rate was 57.0 reported crimes per 1000 people. According to the 1992 crime statistics kept by SANDAG, the City of Imperial beach ranked 9 out of 18 cities for crime (1 being best). The types and level of crimes committed within the City is very similar to the countywide average.



## **Policies**

### **F-7 Public Information and Involvement**

The City shall maintain public information and school educational programs in crime prevention and drug education, and shall assist residents and businesses in developing neighborhood and commercial protection programs.

### **F-8 Crime Rates**

Increased crime is a national problem that is not necessarily correlated with the number of police. The City should have a goal of having a crime rate below the County average and better than the majority of San Diego County cities.

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## **LIBRARY SERVICES**

### **Background**

The Imperial Beach Library, located at 810 Imperial Beach Boulevard, is part of the greater San Diego County library system. The 5,000 square-foot facility is owned and maintained by the County. It has a total collection of 36,700 items (books, videos, audio tapes, magazines, etc.), on-site parking for 12 cars, and a staff of 5.



The County categorizes their library facilities in three categories, small, medium and large. Based upon Imperial Beach library's circulation and number of patrons, it is considered a medium size facility. As such, the facility is open a total of 38 hours a week, Monday through Friday, and is closed on the weekends.

The library facility space standard utilized by the County is 0.35 square feet per capita. Using this standard, the Imperial Beach facility should be expanded to almost double its present size by the year 2005. Due to the County's limited resources, expansion of the facility is not planned at this time; however, the County can apply for State funding.

## **Policies**

### **F-9 Library Size**

The City should work with the County on library needs assessment with the goal of expanding library services for Imperial Beach.

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## **PUBLIC RIGHTS-OF-WAY**

### **Background**

#### **Alleys**

Many of the alleys within the City limits are not paved. In an effort to improve the alleys, numerous assessment districts have been established by the City. It is the City's policy to pave all unimproved alleys and the City has plans to pave the remaining unimproved alleys through the use of assessment districts.

#### **Drainage**

The City completed a master drainage study in 1990. The study identified a number of geographical areas in the City, which are subject to periodic flooding. However, because of the flat topography of the City, several areas will always be subject to an increased flood risk.

Surface run-off, a condition intensified by development as a result of soil compaction and an increase in the amount of impervious surfaces, is presently handled by the street system and a small storm drain system. Most of the captured run-off is deposited directly into the San Diego Bay, Pacific Ocean or the Tijuana Estuary.

In the past, Community Development Block Grant Funds have been utilized to make improvements to the City's drainage system. A possible alternative funding source for storm drain improvements would be a surcharge, which could be added to the sewer fees as authorized by Health and Safety Code Section 5471.

#### **Sidewalks**

Although much of the City is served by sidewalks, sidewalks are missing in a variety of areas. Sidewalks can be particularly important in providing access to schools, parks, the beach and commercial areas. Installation of new sidewalks or improvements to existing sidewalks, if necessary, is required with all building permits for construction valued at greater than \$25,000.

Many parts of the City have tree lawns, while other parts have sidewalks next to the curb. Tree lawns can provide a buffer between pedestrians and the street and, when planted with trees, create a pleasant and safe pedestrian way. In some parts of the City residents have paved in the tree lawns, creating a wide sidewalk. This is visibly unappealing and creates vast areas of hard surface asphalt or concrete.

## **Streets**

The public roads in Imperial Beach have been improved with pavement. Generally, the public right-of-way has also been improved with curbs, gutters and sidewalks. Regular maintenance to the City's road system is financed through the City's share of "Prop A" funds - a sales tax passed by the voters of San Diego County.

## **Street Landscaping**

In cooperation with the Cities of San Diego and Coronado, the City of Imperial Beach has received a \$100,000 Federal grant from the Intermodal Surface Transportation Efficiency Act of 1991, which will be matched with \$70,000 of Proposition "A" funds to complete landscape improvements to the Highway 75/Palm Avenue corridor.



Although the City has vast areas of tree lawns, virtually none of the tree lawns have trees in them. Additionally, there is a general lack of trees throughout the City.

## **Undergrounding of the Utilities**

The City has recently completed the undergrounding of utilities along the Highway 75/Palm Avenue corridor. The City has also established a utility underground conversion district on Imperial Beach Boulevard, from Seacoast Drive to the eastern City limits. This project will also result in improved street lighting along this corridor. The City has identified and prioritized two other areas for new lighting and undergrounding of utilities. They are as follows:

1. Thirteenth Street, from Iris Avenue to SR 75/Palm Avenue.
2. Ninth Street, from Imperial Beach Boulevard to SR 75/Palm Avenue.

## **Policies**

### **F-10 Alleys**

In order to reduce air pollution, facilitate City services, and reduce the number of curb cuts on streets, all new construction adjacent to alleys shall be required to bring the

alley up to City standards or provide an approved lien contract. The City shall continue to pursue the objective of having all alleys in the City paved.

### **F-11 Drainage**

The City shall develop programs to solve localized Imperial Beach drainage problems. Such programs shall include working with the City of San Diego and the U.S. Navy as necessary.



### **F-12 Sidewalks/Treelawns**

The City's preferred location for sidewalks shall be in an area that is not contiguous with the paved street and curb. The area between the street curb and the sidewalk shall be used for street lawns and the planting of street trees. This policy shall be implemented as part of development approvals except in areas already committed to curb side sidewalks. Tree lawns shall not be paved except where satisfactory trees have been planted in the tree lawn and decorative paving material is used, such as bricks or pavers.

### **F-13 New Sidewalks**

The City shall encourage property owners to complete missing portions of sidewalks and, for larger areas, should sponsor the creation of sidewalk assessment districts. Improvements to existing sidewalks, or new sidewalks, shall be required with all building permits for construction valued at greater than \$25,000.

### **F-14 Street Trees**

The City should pursue a variety of programs for street tree planting including the possible use of assessment districts, non-profit corporations, extensive tree planting campaigns and requiring street trees with new development.



### **F-15 Undergrounding of Utilities**

The City shall pursue the undergrounding of utilities on major streets as funding becomes available. Priorities should be:

1. Thirteenth Street, from Iris Avenue to SR 75/Palm Avenue.
2. Ninth Street, from Imperial Beach Boulevard to SR 75/Palm Avenue.

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## SCHOOLS

### Background

Public school education in Imperial Beach is provided by South Bay Union School District for preschool and kindergarten through sixth grade. Sweetwater Union High School District serves seventh through twelfth grade.

The South Bay Union School District presently has 12 elementary schools and one preschool site within its district. Six of the elementary school sites are located within the City limits of Imperial Beach. Today, the District is severely impacted with more students than the school's fixed facilities can accommodate. In order to reduce this problem, the district has placed, on an "as-needed basis," portable classrooms on each site. In addition, many of the schools utilize year-round, 4-track programming of classes. In order to alleviate further overcrowding, students are sometimes placed in classrooms outside their normal school attendance boundary. Table F-1 summarizes the situation regarding the schools within the City limits of Imperial Beach.

<b>TABLE F-1</b>						
<b>IMPERIAL BEACH SCHOOL DATE, 1993</b>						
School Site	Size	Capacity of Fixed Facility	of Portable Classrooms	Student Enrollment	4-Track	
Bayside Elem.	9.50 ac.	660	8	924	yes	
Central Elem.	5.97 ac.	660	7	891	yes	
Harbor View Elem.	6.85 ac.	660	6	868	no	
Imperial Bch Elem.	9.15 ac.	660	2	726	no	
Oneonta Elem.	10.77 ac.	620	3	726	no	
Westview Elem.	6.75 ac.	600	4	732	no	
Mar Vista Middle School	30.0 ac.	1246	0	1249	no	
Mar Vista High School	33.0 ac.	1300	8	1,867	no	

Although portable classrooms provide class space for an over-crowded school, they do not eliminate the need for additional facilities such as more library space, cafeteria and playground area. To meet the overall need of the student population, new schools need to be built.

The South Bay Union School District is presently building a new elementary school adjacent to the existing Nicoloff Elementary School, which is located outside of the City limits of Imperial Beach. They have also acquired a second school site at Coronado and Saturn and hope to build a new elementary school in the near future. When both new elementary schools are constructed and the attendance boundaries of the existing schools readjusted, the projected school population for the district, using the South Bay District's student generation factor of .67 school age children per household, should be

able to be accommodated within permanent school facilities. Although these new schools are not located within the City limits of Imperial Beach, they will relieve the overcrowding situation for schools located in Imperial Beach, as well as the remainder of the district.

The Sweetwater Union High School District provides 7th through 12th grade education and Adult Education to the citizens of Imperial Beach. Two secondary schools and one adult school service the City: they are Mar Vista Middle School, Mar Vista High School and Mar Vista Adult School located on the Mar Vista High School Campus.

The middle school, located approximately a quarter mile outside the City's eastern boundaries (1267 Thermal, San Diego), provides 7th to 8th grade education. The high school, located at 505 Elm Street, Imperial Beach, provides 9th to 12th grade education. The Adult School, located at 503 Elm Street, provides a variety of classes including but not limited to, GED, English as a Second Language (ESL), High School Diploma Program, Business Education and Child Care classes.

The middle school and high school both exceed their capacities. High-density residential development in the City and new residential development in the Nestor and the San Ysidro Communities have impacted these and neighboring schools. To alleviate these conditions, the District plans to construct a new 2,400-student high school on the Otay Mesa.

When, and if constructed, the new high school will alleviate the overcrowding on the Mar Vista School site. In planning new schools, the Sweetwater School District uses a student generation factor of .29 students per household.

The recommended standard for new elementary school sites is ten acres of land, which will provide adequate land for 18 to 20 classrooms, playgrounds and other related uses. For new junior high schools (or middle schools), 20 acres of usable land is needed for 1,500 students. High schools require 50 acres of land for 2,400 students.

State AB 2926 authorized school districts to assess all new development a fee to offset impacts proposed projects might have on the school facilities. In January of 1994, a fee of \$1.65 per square-foot for residential developments and \$.27 per square foot for commercial development is permitted. Currently, South Bay Union School District sets its level of assessment for development at \$.73 per square-foot for residential and \$.12 per square-foot for commercial development. These fees, along with funds provided by the State, allow for the district to acquire portable classrooms and to construct new school facilities when deemed necessary. Sweetwater Union High School District assesses new residential development at \$.92 per square-foot and commercial development at \$.15 per square-foot.

Fees collected pursuant to AB 2926 account for less than a third of the cost to construct classrooms. Because of this, whenever possible, the Districts have requested that developers provide full impact mitigation on development. The establishment of special tax districts, full cost recovery agreements or the provision of relocatable classrooms in

lieu of fees are just a few examples of such mitigation measures employed by the Sweetwater Union High School District.

Southwestern Junior College, located in Chula Vista, serves Imperial Beach as well as a good portion of the South Bay area.

## **Policies**

### **F-16 Elementary School Sites**

The City should encourage the South Bay Union Elementary School District to expand its elementary school sites within Imperial Beach to 10 acres each. Surrounding properties should be acquired when they come on the market for re-sale.

### **F-17 Otay High School**

The City should support the Sweetwater Union High School District's long term plans to construct a new high school in the Otay Mesa area.

### **F-18 Joint Use of Schools**

The City and school districts should work closely together on joint usage of school facilities. Buildings can be used for evening meetings, adult education, counseling, etc. Grounds can be used for a variety of recreation activities.



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## SOLID WASTE DISPOSAL

### Background

Laidlaw Waste Systems services the Imperial Beach area with solid waste collection. They have an exclusive franchise with the City of Imperial Beach for the collection of all residential and commercial refuse until the year 2000 (if they choose to renew their option in 1995). Residential collection is twice a week, with the first pickup dedicated to yard clippings and other recyclable items, and the second pickup dedicated to trash. There is also a bimonthly alley clean up.

All waste materials are taken to San Diego County's Otay Landfill. At current dumping rates, the landfill, as presently configured, is expected to remain serviceable until the late 1990's. The County plans to expand the existing facility in order to add additional capacity. This additional capacity will extend the life of the landfill an additional 15 years. The City of Imperial Beach has already instituted the separation of yard clippings from the remainder of the trash and the recycling of aluminum cans, tin cans, glass bottles, newspapers and two types of plastic.

### Policies

#### F-19 Recycling and Source Reductions

The City shall emphasize source reduction by its residents and businesses to decrease the amount of solid waste generated. The City shall also maintain a recycling program to minimize impacts on regional solid waste disposal sites.



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## WASTEWATER SERVICES

### Background

The City of Imperial Beach is a member of the San Diego Metropolitan Sewerage System (Metro). The City operates its own sewerage 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, 16,200 feet of force main, and approximately 36 miles of sewer lines ranging in diameter from 6 inches to 21 inches. Where possible, the sewage system utilizes gravity flow to convey effluent, however, in some instances, pumping is required. Two major service areas of Imperial Beach are served by large pump stations. The west side of the City's sewage is transported to Pump Station No. 8, located at 9th Street and Imperial Beach Boulevard, prior to conveyance to Metro. The east side of the City and a portion of the west side of the City's sewage is pumped by force main to Calla and Florida Streets prior to conveyance to the Palm City Pump Station by gravity sewer flow. Effluent from both pump stations enters Metro's South Bay Interceptor.

Portions of the wastewater management system are up to 40 years old. The oldest pipes in the system are made of vitrified clay, which carries a life expectancy of approximately 75 years. Some portions of the system are in need of repair and are currently scheduled for replacement dependent upon urgency.

Infiltration, defined as water entering the sewer system from the groundwater table, is a significant problem. Portions of the City's system are very susceptible to sea water infiltration due to the close proximity of the ocean and the depth of the pipe relative to sea level. Areas of probable high seawater intrusion include the collection lines leading to Pump Station 1A, 1B, and 2; in alleys between Seacoast Drive and the ocean; and just west of Pump Station 10 at Cypress and Eighth Street. Correction of this problem includes TV inspection inside of the pipes, lining and sealing of the pipe if it appears structurally sound and the leaks are not too numerous, or complete replacement. By the end of 1993, it was estimated that approximately one quarter of the problem areas were lined.

In 1990, the City adopted a Sewerage System Master Plan prepared by Engineering-Science, Inc. The plan's conclusions and recommendations utilized the 1981 General Plan for ultimate build-out of the City. The report identified a number of deficiencies in the existing system. Besides the groundwater infiltration problem, the report identified improvements needed to the interceptor/trunk sewer, and pumping stations. Utilizing this report, the City's Five Year Capital Improvement Program since 1990 has included improvements to correct many of the deficiencies.

In 1993, the City of Imperial Beach discharged an average of 2.5 million gallons per day (mgd) of waste into the Metro system. The City's agreement with Metro allows flows up to 3.5 mgd until the year 2003. The City pays \$33,000 per year to Metro in order to retain their reserved sewer capacity. The Navy has contracted with the City of Imperial Beach for 0.5 mgd portion of the City's 3.5 mgd allotment.

The combined flow from the Navy and the City can increase by 1.0 mgd before the Metro capacity allocation is exceeded. This represents a combined reserve capacity of approximately 4,000 equivalent dwelling units (EDU) using 250 gpd per EDU. However, if the total capacity reserved for the Navy were to be utilized, the remaining reserved capacity for the City of approximately 2,000 EDU, is adequate for the City's projected ultimate build-out based upon the General Plan projections. Ultimate flow estimates predict that the City will require less than the reserved 3.5 mgd for complete build-out (including the Navy usage). This appears to be especially true when the following facts are considered:

- The actual sewage flows per dwelling unit in Imperial Beach appear to be lower than the 250 gpd standard utilized for EDU.
- The Navy has significantly scaled down its usage since its peak in the 1970's.
- The problem of infiltration of groundwater entering the sewer system is slowly being resolved, thus decreasing the flows.
- It should also be noted that a new San Diego Area Waste Management District is being formed to replace the Metro System and is talking about eliminating the reserve capacity system, and developing a different system for assuring that adequate wastewater service capacity can be guaranteed.

The City of Imperial Beach has established an Enterprise Fund to financially support sewer services in the City. The fees that are collected for providing services, and a \$2,400 connection (hook-up) fee, fund the total program. All the money that is collected is utilized exclusively for sewer service, and covers the cost of all capital improvement outlays, the treatment of effluent by the Point Loma treatment facility, staffing and other miscellaneous expenses.

A related issue to the City's wastewater service is water contamination that originates in Mexico. The ocean and sandy beaches of Imperial Beach are considered a major asset for the City. Unfortunately, as early as 1959, the San Diego County Department of Public Health has periodically placed quarantines on the City's beaches. These quarantines prohibit swimming in the effected ocean waters, but non-water contact recreation is still permitted on the beach. The pollution problem is solvable but not by Imperial Beach. Solutions to the pollution problem are within the jurisdiction of many different agencies --Federal, State and International, as well as the City of San Diego.

## **Policies**

### **F-20 Sewage Capacity**

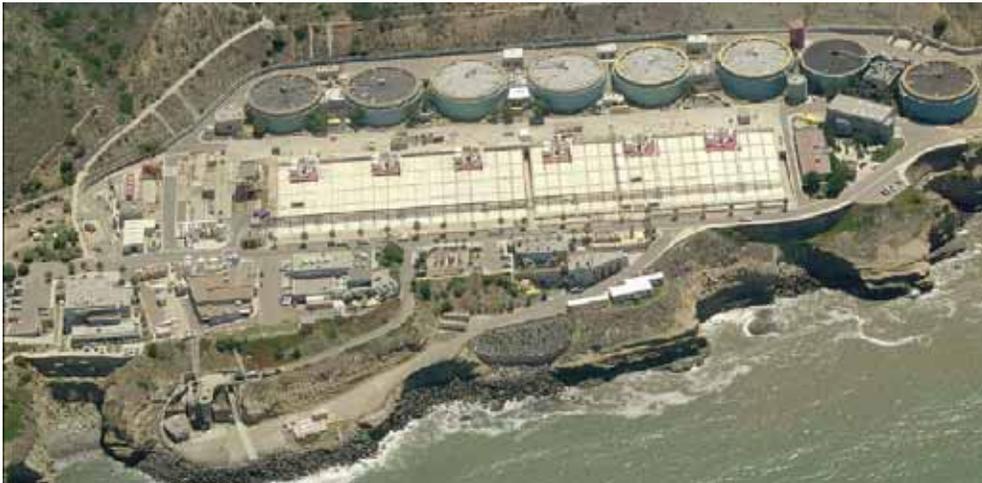
The City shall develop whatever agreements are necessary with the San Diego Area Wastewater Management District to provide sewer treatment capacity to accommodate the General Plan's projected growth.

### **F-21 Mexico Sewage Issues**

The City shall encourage Federal, State, and other responsible agencies to address the problems of drainage, sewage and beach pollution associated with the Tijuana River Valley.

### **F-22 Upgrade Systems**

The City shall continue to upgrade its sewage system based on the 1990 Sewage System Master Plan.



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## **WATER SERVICES**

### **Background**

The California-American Water Company (CAWC) provides water service to the City of Imperial Beach, the City of Coronado, and portions of south San Diego and Chula Vista. As a private water company, CAWC is not a member of the County Water Authority. Instead, their water is purchased directly from the City of San Diego. CAWC's contract agreement with the City of San Diego assures CAWC the right to purchase as much water as they require to supply their customers for an indefinite period of time. In the event of a drought, which would require water restrictions, the contract provides for San Diego's and CAWC's customers to be restricted proportionately.

Currently, CAWC services approximately 20,300 customers. Between 25-30% of the company's customers are within the City limits of Imperial Beach. The current water distribution for the entire service area is approximately 13,000 acre-feet annually; with the City's usage being proportional. None of the



company's storage tanks, wells and/or booster pumps are located within Imperial Beach. Water service in the City is accomplished through individual connections to lateral mains generally running beneath north-south streets. The main supply line for the distribution system is a 16-inch line located beneath Palm Avenue.

Most of the water system in Imperial Beach was constructed during the 1940's and 50's. The system is considered to be fairly new and in good condition. CAWC regularly performs normal maintenance, which involves an on-going program, which seeks to replace older and undersized pipes in the water system.

The Company does not charge a hook-up fee. The individual water service fee is all inclusive, and covers not only the cost of providing water, but also the costs related to upgrading the existing distribution system.

### **Policies**

#### **F-23 Water Conservation**

The, City shall require water conserving features in all new developments, including landscape and irrigation improvements.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



September 20, 2021

Andy Hall, City Manager  
City of Imperial Beach  
825 Imperial Beach Blvd.  
Imperial Beach, CA, 91932

Dear Andy Hall:

**RE: City of Imperial Beach's 6<sup>th</sup> Cycle (2021-2029) Adopted Housing Element**

Thank you for submitting the City of Imperial Beach's (City) housing element adopted June 16, 2021, and received for review on June 28, 2021. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

HCD is pleased to find the adopted housing element in full compliance with State Housing Element Law (Article 10.6 of the Gov. Code). The adopted element was found to be substantially the same as the revised draft element that HCD's June 15, 2021, review determined met statutory requirements.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

[http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and  
[http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

HCD appreciates the collaboration with the City's housing element team throughout the course of the housing element review. HCD wishes the City success in implementing its housing element and looks forward to following its progress through the general plan annual progress reports pursuant to Government Code section 65400. If HCD can provide assistance in implementing the housing element, please contact Jose Ayala, of our staff, at [Jose.Ayala@hcd.ca.gov](mailto:Jose.Ayala@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is written in a cursive, flowing style.

Shannan West  
Land Use & Planning Unit Chief

# City OF IMPERIAL BEACH

## HOUSING ELEMENT OF THE GENERAL PLAN YEAR 2021-2029

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Adopted  
June 16, 2021

**RESOLUTION NO. 2021-34**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF IMPERIAL BEACH, CALIFORNIA, AMENDING THE GENERAL PLAN (GPA-21-0001) BY ADOPTING THE 2021-2029 IMPERIAL BEACH HOUSING ELEMENT AND ADOPTING ITS NEGATIVE DECLARATION. MF 1335.**

**WHEREAS**, on August 26, 2020, a public workshop was conducted to obtain public input; and

**WHEREAS**, on January 20, 2021, the City Council of the City of Imperial Beach held a duly advertised public hearing to consider comments on the draft 2021-2029 Housing Element before transmitting to the California Department of Housing and Community Development (HCD) for a 60-day review; and

**WHEREAS**, the draft 2021-2029 Housing Element was advertised for a 45-day public review period from March 19, 2021 to May 3, 2021 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**, revisions to the draft Housing Element were made based on comments by HCD and were incorporated into the final draft; and

**WHEREAS**, the City Council of the City of Imperial Beach hereby finds that the proposed General Plan Amendment (GPA-21-0001), 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 2021-2029 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 2021-2029 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 March 11, 2021 to April 10, 2021 in accordance with CEQA and the draft ND was routed for state agency review through the Clearinghouse (SCH# 2021040442) from April 19, 2021 to May 20, 2021 and no comments were received; and

**WHEREAS**, based on declining uses, low existing Floor Area Ratio, COVID-impacted uses, and general development trends, the existing uses on the sites identified in the site inventory to accommodate the lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the Housing Element; 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 # 2021040442) 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 # 2021040442) and any written or verbal comments received during the public review period;
- 3) Revisions, if any, in the project plans or proposals 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.

**WHEREAS**, upon adoption of the 2021-2029 Housing Element the document will be submitted to the California Department of Housing and Community Development for certification.

**NOW, THEREFORE, BE IT RESOLVED** by the City Council of the City of Imperial Beach as follows:

1. That the foregoing recitals are true and correct.
2. That the 2021-2029 Imperial Beach Housing Element and its Final Negative Declaration are hereby adopted.

**PASSED, APPROVED, AND ADOPTED** by the City Council of the City of Imperial Beach at its regular meeting held on the 16<sup>th</sup> day of June 2021, by the following vote:

<b>AYES:</b>	<b>COUNCILMEMBERS:</b>	<b>AGUIRRE, LEYBA-GONZALEZ, FISHER, SPRIGGS</b>
<b>NOES:</b>	<b>COUNCILMEMBERS:</b>	<b>NONE</b>
<b>ABSENT:</b>	<b>COUNCILMEMBERS:</b>	<b>DEDINA</b>



**ED SPRIGGS,  
MAYOR PRO TEMPORE**

**ATTEST:**



**SUNEM CARBALLO, CMC  
DEPUTY CITY CLERK**

# Table of Contents

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THE GENERAL PLAN.....	i
Table of Contents.....	i
<b>Section 1: Introduction .....</b>	<b>1</b>
1.1 Statutory Framework .....	1
1.2 Purpose .....	1
1.3 Organization .....	2
1.4 Relationship to Other Elements .....	2
1.5 Citizen Participation .....	3
<b>Section 2: Community Profile .....</b>	<b>5</b>
2.1 Population Characteristics .....	6
2.2 Household Characteristics .....	13
2.3 Housing Problems .....	18
2.4 Special Needs Groups.....	24
2.5 Housing Stock Characteristics.....	31
2.6 Affordable Housing .....	41
2.7 Coastal Zone Requirements .....	42
<b>Section 3: Housing Constraints.....</b>	<b>45</b>
3.1 Market Constraints .....	45
3.2 Governmental Constraints .....	48
3.3 State and Federal Regulations .....	71
3.4 Infrastructure Constraints .....	72
3.5 Environmental Constraints.....	73
<b>Section 4: Housing Opportunities and Resources .....</b>	<b>75</b>
4.1 Future Housing Needs.....	75
4.2 Financial Resources for Housing.....	82
4.3 Administrative Resources.....	84
4.4 Opportunities for Energy Conservation.....	85
<b>Section 5: Housing Plan .....</b>	<b>87</b>
5.1 Goals and Policies.....	87
5.2 Housing Programs .....	91
5.3 Quantified Objectives .....	104
<b>Appendix A: Community Outreach .....</b>	<b>A-1</b>
A.1 Outreach List .....	A-1
A.2 Public Meetings .....	A-3
A.3 Public Comments Received.....	A-3
<b>Appendix B: Review of Previous Housing Element (2013-2021) .....</b>	<b>B-1</b>
<b>Appendix C: Residential Sites Inventory .....</b>	<b>C-1</b>
<b>Appendix D: Fair Housing Assessment.....</b>	<b>D-1</b>
D.1 Introduction and Overview of AB 686 .....	D-1
D.2 Assessment of Fair Housing Issues .....	D-1
D.3 Sites Inventory .....	D-35
D.4 Identification and Prioritization of Contributing Factors .....	D-37

## List of Tables

Table H-1: Population Growth (2000-2035) .....	6
Table H-2: Child and Senior Population in Imperial Beach and San Diego County (2000-2018).....	8
Table H-3: Age Characteristics (2010-2018).....	9
Table H-4: Racial Composition (2018) .....	10
Table H-5: Employment Characteristics (2010-2018) .....	12
Table H-6: Mean Salary by Occupation - San Diego Region (2020).....	12
Table H-7: Household Characteristics (2018) .....	13
Table H-8: Changes in Household Types (2000-2018).....	14
Table H-9: Average Persons per Household (2018) .....	14
Table H-10: Households by Income Category (2013-2017).....	15
Table H-11: Housing Assistance Needs of Lower Income Households (2013-2017).....	19
Table H-12: Housing Problems in Imperial Beach and San Diego County (2010-2017).....	20
Table H-13: Overcrowded Housing Units - Imperial Beach and San Diego County (2000-2018) .....	21
Table H-14: Cost Burden by Tenure and Income Level (2010-2017) .....	23
Table H-15: Special Needs Groups in Imperial Beach (2014-2018) .....	24
Table H-16: Persons Age 65 and Over (2014-2018).....	25
Table H-17: Disability Status (2014-2018) .....	26
Table H-18: Large Households (2018).....	27
Table H-19: Large Households by Tenure and Income Level, Imperial Beach (2013-2017) .....	28
Table H-20: Single-Parent Households (2014-2018) .....	29
Table H-21: Homelessness in Imperial Beach and San Diego Regions (2020).....	31
Table H-22: Housing Unit Growth (2000-2020).....	32
Table H-23: Projected Housing Units (2020-2050) .....	33
Table H-24: Housing Unit by Type (2010-2050).....	34
Table H-25: Tenure of Occupied Units (2010-2018) .....	34
Table H-26: Household Size by Tenure (2010-2018).....	34
Table H-27: Vacancy Rates by Community and Property Age (2019) .....	35
Table H-28: Changes in Median Home Sale Prices (2010-2020) .....	37
Table H-29: Average Monthly Rent (2019) .....	38
Table H-30: Affordable Housing Costs (2020) .....	41
Table H-31: Inventory of Assisted Rental Housing (2020) .....	42
Table H-32: Disposition of Home Purchase and Improvement Loan Applications (2018).....	47
Table H-33: Land Use and Zoning .....	49
Table H-34: Basic Development Standards .....	52
Table H-35: Mixed Use Density Bonus Development Incentives .....	53
Table H-36: Parking Requirements for Residential Uses.....	54
Table H-37: Allowable Residential Uses .....	56
Table H-38: Planning Deposits .....	65
Table H-39: Comparison of Planning Fees - Initial Deposits.....	65
Table H-40: Fee Comparisons (2019-2020) .....	66
Table H-41: Typical Permit Processing Timelines.....	68
Table H-42: Housing Needs for 2021-2029 .....	75
Table H-43: Credits Toward RHNA.....	76

Table H-44: Recent Mixed Use and Multi-Family Developments .....	80
Table H-45: Vacant and Underutilized Sites Summary .....	81
Table H-46: RHNA Accommodation .....	82
Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation .....	100
Table H-48: Quantified Housing Objectives (2021-2029).....	104

**List of Figures**

Figure H-1: Regional Location .....	5
Figure H-2: Age Distribution of Imperial Beach Population (2010-2018).....	8
Figure H-3: Race/Ethnicity (2018).....	10
Figure H-4: Median Household Income (2014-2018).....	16
Figure H-5: Household Income (2014-2018).....	17
Figure H-6: Type of Housing Unit (2020) .....	33
Figure H-7: Housing Stock Age (2014-2018) .....	36
Figure H-8: Median Home Sales Price (2020) .....	37
Figure H-9: Imperial Beach Zoning Map .....	51

# Section 1: Introduction

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## 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 required 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....”*

This Housing Element (2021-2029) 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 household characteristics;
- An inventory of suitable land for residential development;
- An identification of a zone or zones where emergency shelters are permitted by right;
- 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 requires every California city to adopt a general plan that contains seven mandatory topics called "elements," but are given flexibility in how elements are named and organized. The Imperial Beach General Plan Land Use, Mobility, Conservation and Ecotourism, Housing, Land Use, Noise, Open Space and Safety elements are mandatory elements. Cities may also adopt other optional elements. Imperial Beach has added Design; Facilities and Services; and Parks, Recreation and Coastal Access as optional elements. All elements carry equal weight and are designed to be consistent with each other. The General Plan/Local Coastal Plan Update of 2019 included all but the Housing Element and Noise Element.

Eighty seven percent of Imperial Beach lies within the Coastal Zone. The Coastal Act of 1976 requires the City to have a Local Coastal Program certified by the State Coastal Commission. The General Plan/Local Coastal Plan Update of 2019 was a combined document meeting both the state general plan requirements and coastal plan requirements. The City is currently working with the Coastal Commission to amend its Local Coastal Plan.

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 is being updated at this time in conformance with the 2021-2029 update cycle for jurisdictions in the SANDAG region and has been reviewed with the rest of the General Plan to ensure internal consistency. As portions of the General Plan are amended in the future, the Plan (including the Housing Element) will be reviewed to ensure that internal consistency is maintained

## **1.5 Citizen Participation**

Public participation for the 2021-2029 Housing Element included an online City Council Special Workshop Meeting on August 26, 2020. 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 also posted on City website and social media platforms and ads were printed for two weeks in the local newspaper inviting the community to the workshop. A second meeting before the City Council is planned for January 20, 2021 to review the Draft Housing Element. A public review draft was prepared and made available to the community prior to the January 20, 2021 meeting and continued to be available for at least 60 days. The City sent a notification that the Housing Element Sixth Cycle Draft was complete and available on the City website. This notification was sent using the City’s online news center, which sends an email to all those who have subscribed to receive news from the City and included the stakeholders on the mailing list in Appendix A of the Housing Element. Translation services for Spanish speakers were made available at meetings but no requests for services were made.

Affordable housing developers and housing professionals were invited to attend the City’s Housing Element meetings via direct mailings. Most housing developers, housing professionals, and agencies and organizations that provide supportive housing services to lower and moderate-income households and persons with special needs serve the San Diego region as a whole. While no developers attended the City of Imperial Beach’s Housing Element workshops, City staff has been in contact with local developers regarding development interests, constraints, and opportunities. The sites inventory in this Housing Element specifically includes several sites as a result of consultation with developers.

Comments provided at community meetings and on the draft Housing Element focused on ADUs. Residents expressed support for the facilitation of ADUs. The City has included an ADU Program (Program 12) to develop incentives and tools to facilitate ADU construction by April 2022. Incentives may include: Fee waivers or reductions beyond State requirement; Pre-approved site/floor plans; or Website information on resources and technical assistance.

Other comments expressed concern over growth. The City’s site inventory for RHNA is intended to disperse housing growth throughout the City, with an emphasis along mixed-use corridors. The City’s land use policy incentivizes mixed-use development and jobs/housing balance.

As part of the Regional Analysis of Impediments to Fair Housing process during 2019 and 2020, extensive community outreach was conducted. Specifically, the Alliance for Regional Solutions,

the San Diego Housing Federation, and Southern California Rental Housing Association were interviewed. Lack of affordable housing opportunities and awareness of services and programs are some of the key issues identified. This Housing Element includes programs to facilitate affordable housing development through higher density development as well as ADUs and increased city efforts to provide information and technical assistance to residents.

## 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, and the impacts of COVID-19. 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 2021-2029 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 Corelogic home sales data; among others.

**Figure H-1: Regional Location**



The American Community Survey (ACS), the Census Bureau’s annual sample survey, is 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 surveys the City at least once every three years. The majority of variables used in this Housing Element are obtained from the 2014-2018 five-year estimates. Sources are denoted below each table.

## 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 needs.

### 2.1.1 Population Growth

The population in Imperial Beach increased from 26,324 in 2010 to 28,055 in 2020 (Table H-1). This 6.6 percent population increase between 2010 and 2018 followed a decrease in population in the preceding decade. Between 2000 and 2010, Imperial Beach’s population declined by 2.5 percent from 26,992 to 26,324. The SANDAG 2050 Regional Growth Forecast estimates that the Imperial Beach population will continue to increase and reach 30,369 by 2035. Although population growth in the City has been 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		
	2000	2010	2020	2035*	2000-2010	2010-2020	2020-2035
Chula Vista	173,860	243,916	272,202	326,625	40.3%	11.6%	20.0%
Coronado	24,100	18,912	21,381	24,165	-21.5%	13.1%	13.0%
El Cajon	94,819	99,478	104,393	109,383	4.9%	4.9%	4.8%
<b>Imperial Beach</b>	<b>26,992</b>	<b>26,324</b>	<b>28,055</b>	<b>30,369</b>	<b>-2.5%</b>	<b>6.6%</b>	<b>8.2%</b>
La Mesa	54,751	57,065	59,966	70,252	4.2%	5.1%	17.2%
Lemon Grove	24,954	25,320	26,526	28,673	1.5%	4.8%	8.1%
National City	54,405	58,582	62,099	73,329	7.7%	6.0%	18.1%
San Diego	1,223,341	1,307,402	1,430,489	1,665,609	6.9%	9.4%	16.4%
Santee	53,090	53,413	57,999	63,812	0.6%	8.6%	10.0%
San Diego County	2,813,833	3,095,313	3,343,355	3,853,698	10.0%	8.0%	15.3%

\* Represents an estimate from the SANDAG 2050 Regional Growth Forecast.  
Sources: Bureau of the Census (2000,2010), California Department of Finance, and SANDAG Regional Growth Forecast Update (2013).

## 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, income earning abilities, 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.

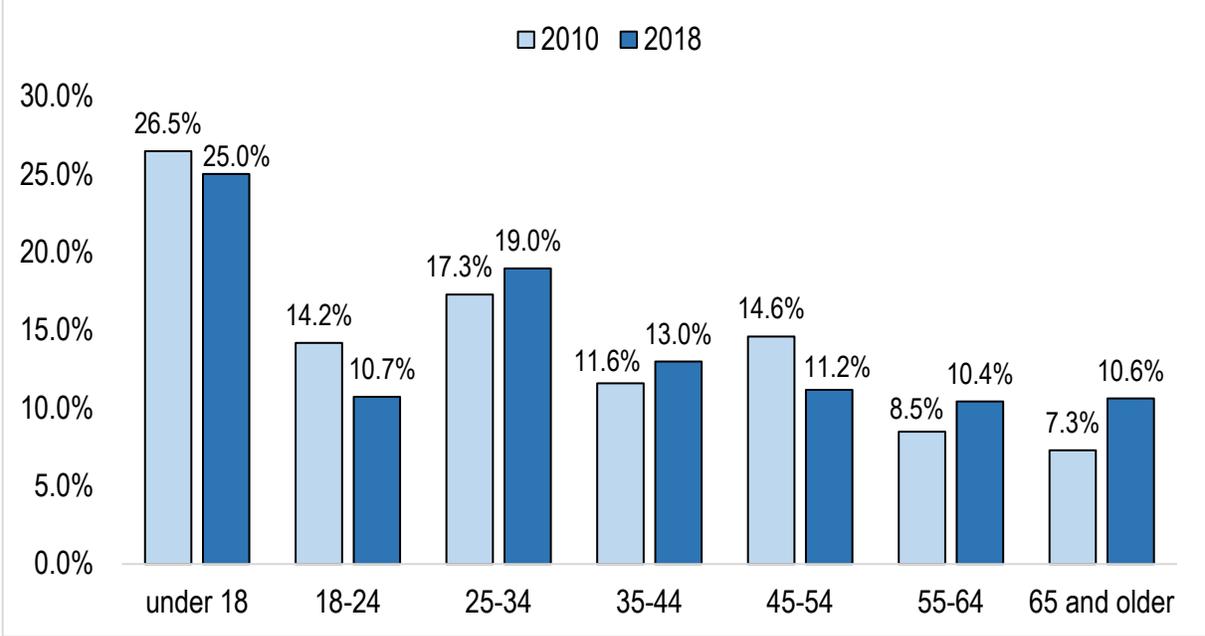
The population of Imperial Beach is, as measured by the median age of its residents, considerably younger than the County as a whole (Table H-2) . In 2018, Imperial Beach's median age was 32 years; nearly three years younger than the County's median age. The lower median age is due to the larger percentage of school age children under 18 (25 percent of the population in 2018 compared to 22 percent in the County) and the smaller percentage of seniors over 65 years of age (11 percent in 2018 compared to 13 percent in the County). Also, the proportion of senior residents in 2018 was higher in neighboring cities than in Imperial Beach. However, over the last 18 years, the proportion of children under the age of 18 has been decreasing (a 4.4 percentage points decrease overall) while the proportion of senior population has been steadily increasing (a 3.1 percentage points increase). This trend resembles the overall county trend where the proportion of children has fallen by 3.6 percent and the proportion of seniors has increased by 2.1 percent.

Table H-2 and Table H-3 compares changes in the age composition of Imperial Beach's population in 2010 and 2018 and shows that the population skews to younger age categories. In 2010 and 2018, young adults (age 25 to 34) made up the second largest age group (second to children), with 17 and 19 percent of the population, respectively. The percentage of adults between 35 and 44 also increased in Imperial Beach by 1.4 percentage points between 2010 and 2018. In contrast, the population of adults aged 35 to 44 decreased in the County between 2010 and 2018 (Table H-3).

Jurisdiction	Under 18 years			Over 65 years			Median Age
	2000	2010	2018	2000	2010	2018	2018
Chula Vista	28.8%	27.9%	25.7%	11.2%	10.0%	12.1%	34.9
Coronado	16.0%	20.4%	18.1%	15.8%	18.4%	19.7%	40.2
El Cajon	27.8%	25.7%	25.4%	11.3%	11.0%	11.9%	32.4
<b>Imperial Beach</b>	<b>29.4%</b>	<b>25.4%</b>	<b>25.0%</b>	<b>7.5%</b>	<b>9.0%</b>	<b>10.6%</b>	<b>32.4</b>
La Mesa	19.8%	19.6%	20.7%	17.1%	14.2%	14.4%	37.6
Lemon Grove	27.6%	25.5%	25.3%	12.0%	11.2%	12.9%	35.4
National City	30.1%	25.5%	21.0%	11.2%	10.6%	12.6%	33.6
San Diego	23.9%	21.4%	20.1%	10.4%	10.7%	12.3%	34.7
Santee	28.3%	23.8%	21.6%	8.9%	10.7%	14.2%	38.8
<b>San Diego County</b>	<b>25.6%</b>	<b>23.4%</b>	<b>22.0%</b>	<b>11.1%</b>	<b>11.4%</b>	<b>13.3%</b>	<b>35.6</b>

Source: Bureau of the Census (2000, 2010); American Community Survey (2014-2018 Estimates)

**Figure H-2: Age Distribution of Imperial Beach Population (2010-2018)**



Source: American Community Survey (2014-2018 Estimates)

Age Group	Imperial Beach			San Diego County		
	% Pop 2010	% Pop 2018	Change	% Pop 2010	% Pop 2018	Change
under 18	26.5%	25.0%	-1.5%	23.8%	22.0%	-1.8%
18-24	14.2%	10.7%	-3.5%	11.8%	10.7%	-1.1%
25-34	17.3%	19.0%	1.7%	15.1%	16.4%	1.3%
35-44	11.6%	13.0%	1.4%	14.0%	13.2%	-0.8%
45-54	14.6%	11.2%	-3.4%	13.9%	12.7%	-1.2%
55-64	8.5%	10.4%	1.9%	10.0%	11.7%	1.7%
65 and older	7.3%	10.6%	3.3%	11.2%	13.3%	2.1%
Median Age	29.6	32.4	2.8	34.5	35.6	1.1

*Sources: American Community Survey, 2006-2010 Estimates and 2014-2018 Estimates*

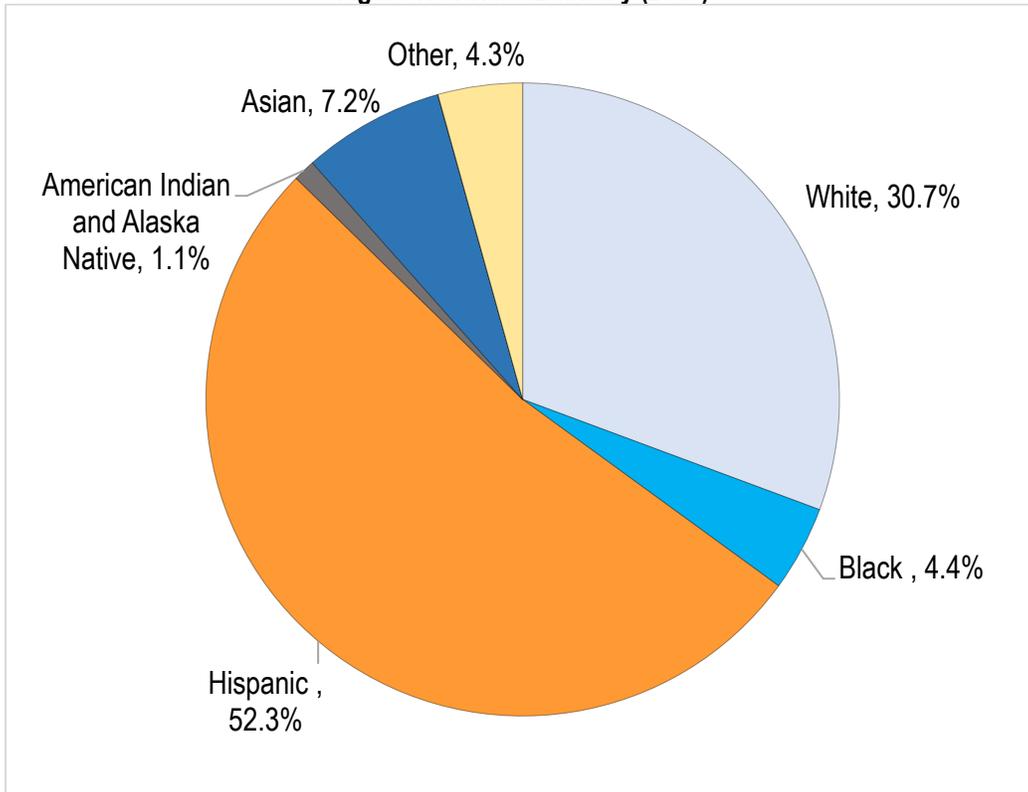
### 2.1.3 Racial and Ethnic Composition

Race and ethnicity of the population is important for 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. 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. . A household/person is considered to be experiencing a cost burden if it spends more than 30 percent of its gross income on housing. 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 2018, Imperial Beach was 52 percent Hispanic, 31 percent White, seven percent Asian, four percent Black, one percent American Indian and Alaska Native, and four percent Other races (Table H-4). Imperial Beach had a noticeably smaller proportion of White residents and larger proportion of Hispanic residents compared to the County (Table H-4). 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. The Pew Research Center reported that multi-generational households - defined as “including two or more adult generations, or including grandparents and grandchildren younger than 25”- were more likely in Asian and Hispanic households than white households<sup>1</sup>. In 2016, 29 percent of the Asian population and 27 percent of Hispanic population lived in multigenerational households, compared to 16 percent of the White population.

<sup>1</sup> Pew Research Center. (April 15, 2018). A record 64 million Americans live in multigenerational households. <https://www.pewresearch.org/fact-tank/2018/04/05/a-record-64-million-americans-live-in-multigenerational-households/>

**Figure H-3: Race/Ethnicity (2018)**



Source: American Community Survey (2014-2018 Estimates)

**Table H-4: Racial Composition (2018)**

Jurisdiction	White	Black	Hispanic	American Indian and Alaska Native	Asian	Native Hawaiian or Pacific Islander	Other
Chula Vista	17.9%	4.0%	58.8%	0.1%	15.5%	0.5%	3.2%
Coronado	74.4%	3.4%	15.6%	0.2%	3.6%	0.1%	2.7%
El Cajon	57.1%	5.5%	28.5%	0.2%	3.7%	0.4%	4.6%
<b>Imperial Beach</b>	<b>30.7%</b>	<b>4.4%</b>	<b>52.3%</b>	<b>1.1%</b>	<b>7.2%</b>	<b>0.0%</b>	<b>4.3%</b>
La Mesa	55.5%	7.1%	25.9%	0.1%	6.5%	0.3%	4.7%
Lemon Grove	28.9%	13.5%	46.7%	0.1%	6.0%	0.4%	4.2%
National City	10.2%	4.5%	63.8%	0.2%	19.3%	0.5%	1.5%
San Diego	42.9%	6.2%	30.1%	0.2%	16.4%	0.4%	3.8%
Santee	69.1%	1.9%	18.1%	0.5%	5.2%	0.3%	4.9%
San Diego County	45.9%	4.7%	33.5%	0.4%	11.6%	0.4%	3.6%

Source: American Community Survey (2014-2018 Estimates)

## 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.

Between 2010 and 2018, the three largest occupational categories for City residents were Educational/Health/ Social Services, Arts/Entertainment/Recreation/Accommodation Services and Retail Trade occupations (Table H-5). These categories accounted for a large proportion (46 percent) of the jobs held by Imperial Beach residents. By comparison, these occupations accounted for 44 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-6 displays mean annual wage data for occupations compiled by the California Employment Development Department (EDD) for the San Diego Metropolitan Statistical Area in 2019. Building and maintenance, farming, fishing and forestry, and food preparation service occupations offer the lowest wages while management, legal, and computer and mathematical occupations offer the highest wages in the area. According to the ACS, between 2014 and 2018, approximately 32 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-6)

The current COVID-19 crisis is expected to have long-lasting impacts on the economy. As of May 2020, unemployment rate in Imperial Beach was measured at 19.2 percent by the State Employment Development Department. The “pre-COVID” unemployment rate in Imperial Beach was reported at 5.3 percent as of March 2020. The impacts of COVID-19 on housing affordability and housing problems (such as cost burden) are expected to worsen, although no data is available yet to substantiate the projections.

Industry	2006-2010 ACS		2014-2018 ACS	
	% of City Employment	% of County Employment	% of City Employment	% of County Employment
Agriculture, Mining	1.5%	0.7%	0.2%	0.9%
Construction	7.0%	7.2%	7.7%	5.9%
Manufacturing	6.3%	9.2%	6.2%	9.2%
Transportation and Warehousing	4.8%	3.8%	7.1%	4.1%
Wholesale Trade	3.2%	2.9%	2.3%	2.4%
Retail Trade	12.6%	10.8%	13.9%	10.5%
Finance, Insurance and Real Estate	7.2%	7.4%	5.1%	6.2%
Professional Services	10.9%	14.2%	11.4%	15.1%
Education, Health, and Social Services	20.5%	19.9%	17.0%	21.3%
Arts, Entertainment, Recreation, and Accommodation Services	14.1%	10.6%	15.3%	11.9%
Other Services	4.5%	7.9%	6.6%	7.6%
Public Administration	7.4%	5.4%	7.3%	5.0%
<b>Total</b>	100.0%	100.0%	100.1%	100.0%
<i>Sources: American Community Survey (2006-2010 and 2014-2018 Estimates).</i>				

Occupations	Average Salary
Management	\$136,531
Legal	\$120,265
Computer and Mathematical	\$104,627
Healthcare Practitioners and Technical	\$102,053
Architecture and Engineering	\$99,949
Business and Financial Operations	\$80,850
Education, Training and Library	\$66,690
Construction and Extraction	\$60,047
Protective Service	\$58,837
Community and Social Service	\$56,793
Installation, Maintenance and Repair	\$54,945
Sales	\$45,974
Office and Administrative Support	\$45,385
Production	\$43,823
Transportation and Material Moving	\$39,362
Building, Grounds Cleaning, and Maintenance	\$36,248
Healthcare Support	\$35,609
Farming, Fishing and Forestry	\$33,243
Food Preparation and Serving Related	\$31,942
All Occupations	\$61,770
<i>Source: California Employment Development Division, Occupational Wage data (1<sup>st</sup> Quarter, 2020).</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 2014-2018 American Community Survey estimates, 1,118,980 households occupied housing units in San Diego County. Of these households, 9,175 households (less than one percent) were in Imperial Beach. Of the 9,175 households in Imperial Beach, 26 percent were single-person households and 17 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 jurisdictions countywide. The proportion of single-parent households is the largest among jurisdictions compared in Table H-7. Overall 34 percent of Imperial Beach’s households consisted of families with children, comparable to the countywide average. However, the percentage of large renter-households is significantly greater than that in most other jurisdictions and throughout the County, with the exception of El Cajon and National City.

Jurisdiction	Single Person Households	Senior Headed Households	Families with Children	Single-Parent Households	Large Households	
					Owner-Occupied	Renter-Occupied
Chula Vista	16.5%	20.0%	44.5%	11.0%	10.9%	7.3%
Coronado	29.6%	34.5%	27.9%	4.9%	2.1%	3.3%
El Cajon	21.3%	19.4%	40.1%	11.1%	4.3%	10.8%
<b>Imperial Beach</b>	<b>25.5%</b>	<b>17.1%</b>	<b>34.5%</b>	<b>14.2%</b>	<b>3.8%</b>	<b>9.8%</b>
La Mesa	31.3%	24.6%	29.3%	9.1%	2.7%	3.7%
Lemon Grove	21.9%	25.2%	38.5%	11.4%	10.1%	6.5%
National City	21.4%	23.5%	39.9%	13.1%	10.4%	10.4%
San Diego	27.4%	19.8%	29.1%	7.5%	4.6%	5.3%
Santee	21.0%	24.6%	33.7%	4.9%	5.9%	3.5%
San Diego County	23.7%	22.3%	33.1%	8.3%	6.0%	5.9%

Source: American Community Survey, (2014-2018 Estimates)

Table H-8 shows that, in 2018, Imperial Beach households consisted mostly of families (65 percent). Slightly more of these families were married couples without children, 1,882 families (21 percent), compared to 1,493 married couple families with children (16 percent). However, the largest group of family-households was other families such as single-parent households (29 percent). The greatest change from 2010 to 2018 was the 16-percent decrease in married couple families with children, followed by the 14-percent increase in single non-family households.

Household Types	2000		2010		2018		Percent Change			
							2000-2010		2010-2018	
	#	%	#	%	#	%	#	%	#	%
<b>Families</b>	<b>6,449</b>	<b>69.6%</b>	<b>6,213</b>	<b>68.2%</b>	<b>6,005</b>	<b>65.4%</b>	-236	-3.7%	-208	-3.3%
Married w/ Children	2,226	24.0%	1,780	19.5%	1,493	16.3%	-446	-20.0%	-287	-16.1%
Married w/o Children	1,961	21.1%	1,955	21.5%	1,882	20.5%	-6	-0.3%	-73	-3.7%
Other Families	2,262	24.5%	2,478	27.2%	2,630	28.7%	216	9.5%	152	6.1%
<b>Non-Families</b>	<b>2,823</b>	<b>30.4%</b>	<b>2,899</b>	<b>31.8%</b>	<b>3,170</b>	<b>34.6%</b>	76	2.7%	271	9.3%
Single	1,983	21.3%	2,046	22.4%	2,341	25.5%	63	3.2%	295	14.4%
Other Non-Families	840	9.1%	853	9.4%	829	9.0%	13	1.5%	-24	-2.8%
<b>Total Households</b>	<b>9,272</b>	<b>100.0%</b>	<b>9,112</b>	<b>100.0%</b>	<b>9,175</b>	<b>100.0%</b>	-160	-1.7%	63	0.7%

Sources: Bureau of the Census (2000,2010); American Community Survey (2014-2018 Estimates).  
Other non-family households are defined as households which do not have any members related to the householder.

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 2018, the average number of persons per household in San Diego County ranged from 2.4 to 3.4, with a countywide average of 2.9 persons per household (Table H-9). Imperial Beach had an average of 2.9 persons per household, representing a small increase from 2010, when the Census reported 2.8 persons per household. Table H-9 also 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 15 years.

Jurisdiction	Average Household Size (2018)	Projected Average Household Size (2035)
Chula Vista	3.4	3.3
Coronado	2.4	2.4
El Cajon	3.1	2.9
<b>Imperial Beach</b>	2.9	2.9
La Mesa	2.5	2.4
Lemon Grove	3.1	3.0
National City	3.4	3.4
San Diego	2.7	2.9
Santee	2.8	2.6
San Diego Region	2.9	2.8

Sources: American Community Survey (2014-2018 Estimates) and SANDAG Regional Forecast Update (2013).

## 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 2013 and 2017 (the most recent data available), approximately 60 percent of Imperial Beach households had lower incomes (Table H-10), while 40 percent of households had incomes in the moderate or above moderate income levels.<sup>2</sup> Imperial Beach also has a much higher lower income population compared to San Diego County’s overall lower income population (43 percent).

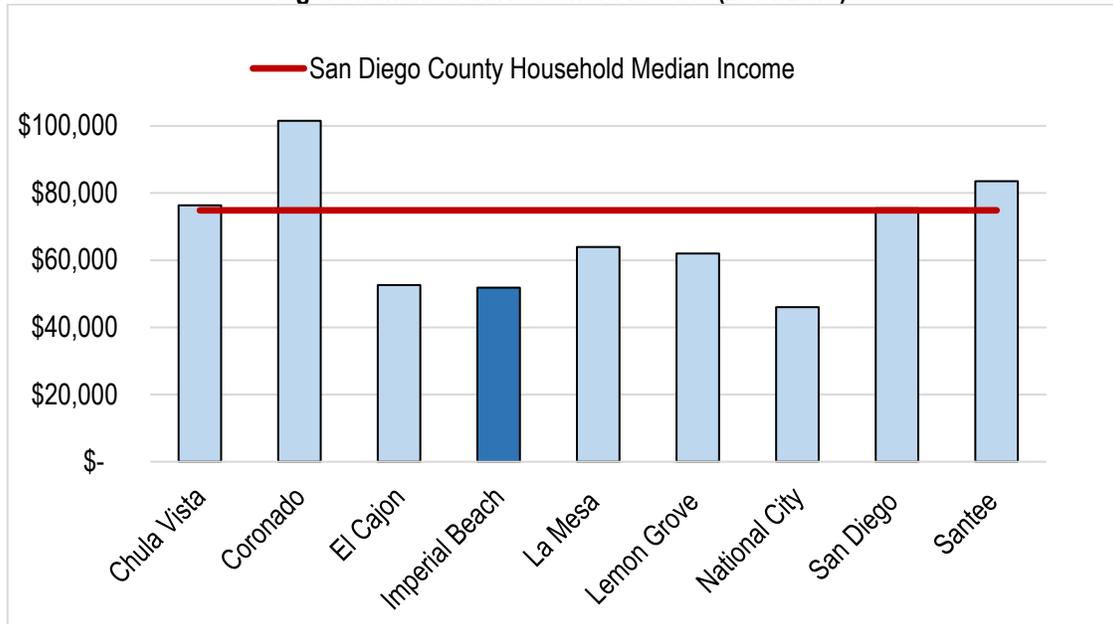
Income Category (% of County AMI)	Imperial Beach		San Diego County	
	Households	Percent	Households	Percent
Extremely Low (30% AMI or less)	1,640	18.5%	155,060	13.9%
Very Low (31 to 50% AMI)	1,590	18.0%	136,890	12.3%
Low (51 to 80% AMI)	2,045	23.1%	186,170	16.7%
Moderate or Above (over 80% AMI)	3,570	40.4%	633,615	57.0%
<b>Total</b>	<b>8,845</b>	<b>100.0%</b>	<b>1,111,735</b>	<b>100.0%</b>

*Sources: Department of Housing and Urban Development (HUD) and Comprehensive Housing Affordability Strategy (CHAS) (2013-2017)*

Household incomes in Imperial Beach also tend to be lower than those in the County. Median household income in the City was \$45,418 in 2010, compared to the San Diego County median household income of \$63,069. The ACS estimates that the median household income in Imperial Beach between 2014 and 2018 increased to \$51,838, compared to \$74,855 in the County. Figure H-4 compares household income in Imperial Beach with the household income of neighboring jurisdictions and San Diego County between 2014 and 2018. As shown, median household income in Imperial Beach was 31 percent below the County median. National City had the lowest median income, recorded at 39 percent below the County median.

<sup>2</sup> Data was obtained from the Comprehensive Housing Affordability Strategy (CHAS) prepared for HUD by the Census Bureau using 2013-2017 American Community Survey Five-Year estimates. 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.

**Figure H-4: Median Household Income (2014-2018)**

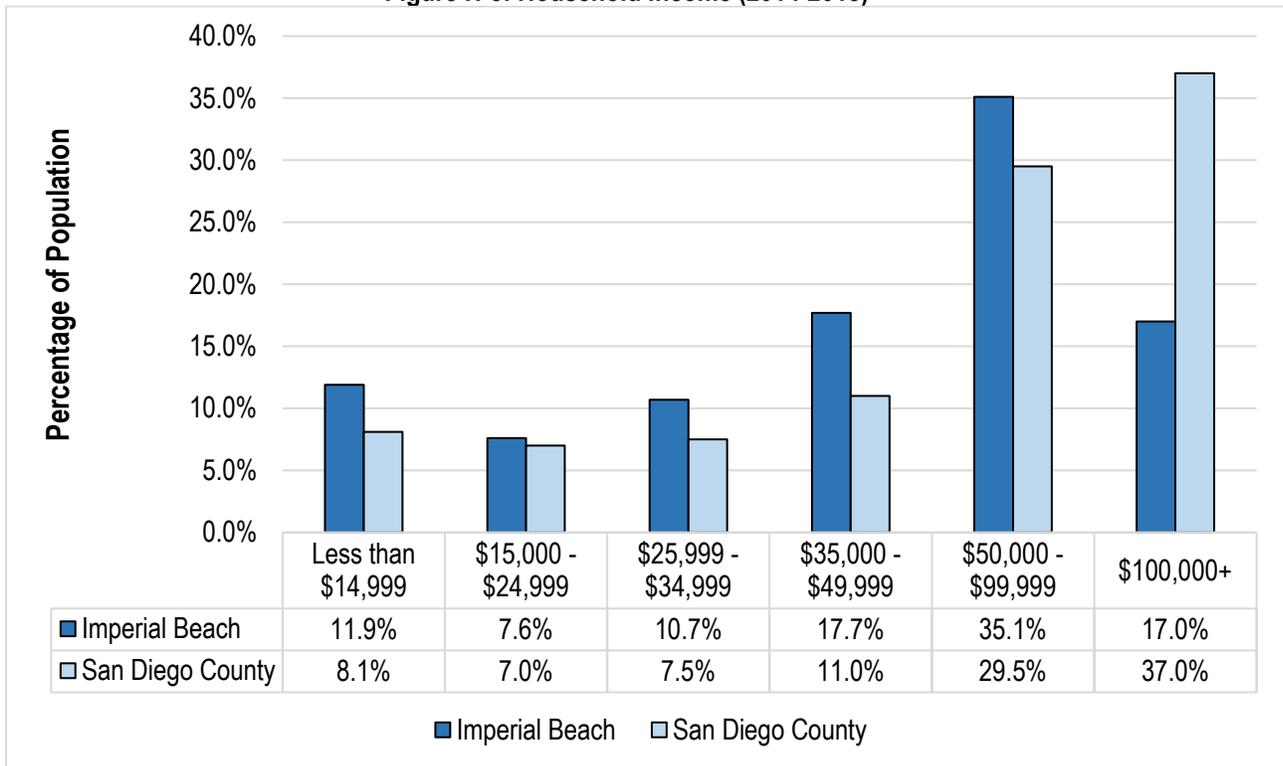


Source: American Community Survey (2014-2018 Estimates).

According to the 2014-2018 ACS, close to 20 percent of Imperial Beach households had incomes lower than \$25,000 (Figure H-5). Approximately 28 percent of the City's households earned incomes between \$25,000 and \$49,999, while 35 percent had incomes between \$50,000 and \$99,999. Only 17 percent of Imperial Beach households earned \$100,000 or more between 2014 and 2018. 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.

With the drastically increased levels of unemployment and underemployment due to the Shelter-in-Place Order, which began on (date) household incomes are expected to also decrease significantly. Unfortunately, the ACS data reflecting this trend would not be immediately available as Imperial Beach is surveyed only once every three years due to its population size.

**Figure H-5: Household Income (2014-2018)**



Source: ACS (2014-2018).

### 2.2.3 Impacts of COVID-19

With the outbreak of the COVID-19 pandemic, over 26 million unemployment insurance claims were filed between March 15 and April 18 at the start of stay-at-home orders as reported by the US Department of Labor. In response Congress passed major relief bills including the \$2 trillion CARES Act, which includes benefits and expanded eligibility for unemployment insurance, forgivable small-business loans, economic relief payments sent directly to most US households, aid to state and local governments, and increased funding for housing assistance and other safety net programs.

The Census Bureau along with other governmental agencies partnered to design the Household Pulse Survey to publish data in as close to real time as possible during the COVID-19 pandemic. The survey provides vital insights on how American households are affected and coping during the pandemic. The Census Bureau expects to collect data for 90 days and release data weekly. One such way the Census Bureau is measuring household experiences during the coronavirus pandemic is through the Household Pulse Survey. Household Pulse Survey results have been reported for State and Metropolitan Area geographies but data for the San Diego Metropolitan Area only has not been reported. Results for the Week 20 Survey (Week of November 25 to December 7) showed that 54 percent (16.2 million) of adults in California reported that they or someone in their household had experienced a loss of employment income since March 13, 2020. About 11 million adult respondents (39 percent) also expected themselves or someone in their household to lose employment income in the next 4 weeks.

In the San Diego region, multiple reports have been completed by the SANDAG to show the impacts of COVID-19. On October 15, 2020 SANDAG published the “COVID-19 Impacts on The

San Diego Regional Economy” report showing a six-month economic analysis since the Stay at Home Order. According to this report, an estimated 176,000 workers were unemployed due to COVID-19 in the San Diego region with lower income workers more likely to be out of work compared to middle and high income workers. Pre-COVID, the region had just over 50,000 unemployed workers. The report also identified the Tourism, Retail, and Education sectors as disproportionately affected by COVID-19. These sectors lost an estimated 141,000 workers, representing 80 percent of those unemployed due to COVID-19 in the region. Females in the Education sector and younger and Hispanic workers were also found to be more likely to lose their jobs in the Tourism sector during this period.

SANDAG also reported in June 16, 2020 that Black and Hispanic communities had been disproportionately impacted by COVID-19 throughout the county. These minorities account for a significant portion of essential workers who continued to go to work, and those who became unemployed in Tourism and “non-essential” Retail sectors due to the pandemic. Black and Hispanic populations were four times as likely to live in areas that had been impacted by COVID-19 and unemployment than White population and twice as likely when compared to the Asian population.. Overall, the southern part of the County is also most affected by both the highest unemployment rates and highest percentage of COVID-19 cases in the region. Before the pandemic, areas in the southern region now most affected by the pandemic also reported household income of less than \$45,000 and a large share of families with children. The report classified ZIP codes with high unemployment rates and high percentages of COVID-19 cases as “hardest hit” areas. As of June 1, 2020, Imperial Beach was identified among the hardest hit ZIP codes Of the 34 ZIP codes reported, Imperial Beach ranked 19 in unemployment level and 11 in COVID-19 cases (highest is ranked 1). As of July 25, 2020 (the most recent data), Imperial Beach remained among the hardest-hit zip codes.

## **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-11. 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) (see Section 2.3.2);
- 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 (60 percent) compared to owner-households (35 percent).

- Large<sup>3</sup> renter-families had the highest level of housing problems regardless of income level (86 percent for renters, 43 percent for owners).
- Extremely low income and very low income had the highest incidence of housing problems (76 percent and 80 percent, respectively).
- Housing problems disproportionately affected elderly renters (65 percent) compared to elderly owners (25 percent).

Though the proportion of the households with housing problems has decreased between 2010 and 2017 for both the City (from 55.1 to 52.2 percent) and the County (from 49.5 to 44.8 percent), see Table H-12. In 2017, a higher proportion (52 percent) of Imperial Beach households continue to experience household problems than the County overall (45 percent). Specifically, about 47 percent of Imperial Beach’s households experienced cost burdens in 2017 compared to 41 percent of households in the County (see Table H-12 below). However, the ACS does not explore reasons for such changes.

**Table H-11: Housing Assistance Needs of Lower Income Households (2013-2017)**

Household by Type, Income, and Housing Problem	Renters				Owners				Total
	Elderly	Small Fam.	Large Fam.	Total Renters	Elderly	Small Fam.	Large Fam.	Total Owners	
<b>Imperial Beach</b>									
Extremely Low Income (0-30% AMI)	280	560	120	1,345	200	45	-	290	1,635
With any housing problem	55.4%	88.4%	100.0%	78.8%	55.0%	77.8%	0.0%	62.1%	75.8%
With cost burden >30%	55.4%	85.7%	100.0%	76.6%	55.0%	88.9%	0.0%	63.8%	74.3%
With cost burden > 50%	48.2%	75.0%	91.7%	66.9%	37.5%	66.7%	0.0%	48.3%	63.6%
Very Low Income (31-50% AMI)	100	620	205	1,305	145	90	10	275	1,580
With any housing problem	80.0%	83.9%	100.0%	89.7%	37.9%	72.2%	0.0%	54.5%	83.5%
With cost burden >30%	84.0%	79.8%	90.2%	86.5%	36.6%	65.6%	0.0%	51.6%	80.4%
With cost burden > 50%	60.0%	27.4%	19.5%	36.4%	31.0%	61.1%	0.0%	47.3%	38.3%
Low Income (51-80% AMI)	230	750	245	1,610	155	145	70	440	2,050
With any housing problem	56.5%	68.7%	95.9%	71.7%	16.1%	55.2%	21.4%	34.1%	63.7%
With cost burden >30%	56.5%	62.7%	42.9%	60.2%	16.1%	55.2%	5.7%	32.7%	54.3%
With cost burden > 50%	10.9%	13.3%	0.0%	12.1%	6.5%	31.0%	5.7%	19.1%	13.6%
<i>Total Households</i>	705	3,015	760	6,025	960	1,135	335	2,795	8,820
<i>With any housing problem</i>	55.3%	53.7%	85.5%	60.2%	27.1%	33.9%	43.3%	35.1%	52.2%
<i>With cost burden &gt;30%</i>	55.6%	49.9%	53.9%	53.6%	26.9%	32.5%	29.3%	32.9%	47.1%
<i>With cost burden &gt; 50%</i>	31.8%	22.9%	19.7%	26.1%	14.6%	13.7%	2.4%	15.1%	22.6%

*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, (2013-2017).*

<sup>3</sup> Households with five or more persons are considered “large” households.

	Imperial Beach		San Diego County	
	2010	2017	2010	2017
Total HH	9,160	8,820	1,061,790	1,111,730
With any housing problem	55.1%	52.2%	49.5%	44.8%
With cost burden >30%	49.3%	47.1%	46.5%	41.3%
With Cost burden >50%	24.9%	22.6%	21.8%	19.4%

*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, (2006-2010) and (2013-2017).*

### 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 within 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.

Between 2006 and 2010, 10 percent of Imperial Beach households lived in overcrowded conditions (Table H-13). Overcrowding disproportionately affected renters (14 percent of renters versus just three percent of owners), indicating overcrowding may be the result of an inadequate supply of affordable, larger sized rental units. Of the 3,075 occupied housing units in the City with at least three bedrooms (the minimum size considered large enough to avoid most overcrowding issues for large households), 40 percent were occupied by renters.

Between 2014 and 2018, overcrowding in the City increased slightly to 11 percent but decreased for owner occupied households according to the ACS (2014-2018). Overcrowding did still appear to disproportionately affect renters. Approximately 15 percent of renter households were overcrowded compared to just two percent of owner households. Despite the increase in overcrowding, the supply of units with three or more bedrooms increased between 2010 and 2018 from 34 percent to 36 percent of the housing stock. Of the 3,297 occupied units with three or more bedrooms, 41 percent were renter-occupied and 59 percent were owner-occupied. Given that overcrowding seems to disproportionately affect renters, it is likely that the rental units with more than three bedrooms are not occupied by large family renters.

Overcrowding also affects Imperial Beach households more than in the County. While the County also saw an increase in overcrowding between 2010 and 2018, the overall proportion of overcrowded households is lower in the County than in Imperial Beach. In 2010, 10.3 percent of households in Imperial Beach were overcrowded compared to just 5.4 percent in the County. By 2018, while 10.8 percent of households were living in overcrowded conditions, 6.7 of the County’s households were overcrowded. Renters are also more affected by overcrowding in Imperial Beach than the County. In 2018, about 15 percent of Imperial beach renter households were overcrowded compared to 11 percent in the County. Owner household overcrowding has been similar for the County and Imperial Beach since 2010.

<b>Table H-13: Overcrowded Housing Units - Imperial Beach and San Diego County (2000-2018)</b>						
<b>Overcrowding</b>	<b>Owner Households</b>		<b>Renter Households</b>		<b>Total Households</b>	
	<b>Number</b>	<b>% of Owners</b>	<b>Number</b>	<b>% of Renters</b>	<b>Number</b>	<b>% of Total</b>
<b>Imperial Beach</b>						
<b>2000</b>						
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%
<b>2006-2010</b>						
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%
<b>2014-2018</b>						
Total Overcrowded (>1.0 persons/room)	58	2.1%	933	14.7%	991	10.8%
Severely Overcrowded (>1.5 persons/room)	13	0.5%	274	4.3%	287	3.1%
<b>San Diego County*</b>						
<b>2006-2010</b>						
Total Overcrowded (>1.0 persons/room)	15,771	2.7%	44,903	9.6%	60,674	5.4%
Severely Overcrowded (>1.5 persons/room)	3,989	0.7%	16,069	3.4%	20,058	1.8%
<b>2014-2018</b>						
Total Overcrowded (>1.0 persons/room)	17,379	2.9%	57,636	11.0%	75,015	6.7%
Severely Overcrowded (>1.5 persons/room)	4,429	0.7%	19,971	3.8%	24,400	2.2%
* 2000 Data for San Diego County not available						
Sources: Bureau of the Census (2000) and ACS (2006-2010 and 2014-2018 Estimates).						

### 2.3.3 Cost Burden

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 to be experiencing a cost burden if it spends more than 30 percent of its gross income on housing and experiencing a *severe* cost burden if it spends more than 50 percent of its gross income on housing.

Table H-14 provides cost burden by income group for Imperial Beach. Approximately 68 percent of lower income households overpaid for housing between 2013 and 2017 versus 16 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 54 percent of renter-households paid more than 30 percent of their income on housing compared to 33 percent of owner-households. Extremely low and very low income renter-households experienced the highest incidence of cost burden (74 percent and 80 percent, respectively).

ACS (year) data reflects the trends that renters were more impacted by cost burden than owners. Between 2014-2018, ACS reported that 54 percent of renter-occupied households in Imperial Beach spent more than 30 percent of their household income on housing. By contrast, a lower percentage of owner-households (33 percent) were burdened by housing costs. This trend is also seen in County households where 52 percent of renter households experience cost burdens compared to 32 percent of owner households.

Imperial Beach and the County's proportion of households experiencing cost burdens have decreased between 2000 and 2017. While the proportion of households in San Diego County experiencing cost burdens has decreased by about six percent in those seven years, only owner cost burden has decreased. The proportion of Imperial Beach households experiencing cost burden has also decreased by about 4 percent overall. Like the County, the proportion of owner cost burden has decreased more than renter cost burden (4 percent versus 2 percent) in Imperial Beach. Despite these decreases, a greater proportion of Imperial Beach households continue to experience cost burden as of 2017 (54 percent) than the County overall (41 percent).

**Table H-14: Cost Burden by Tenure and Income Level (2010-2017)**

Household Income Group	2010			2017		
	Total Renters	Total Owners	Total	Total Renters	Total Owners	Total
<b>Imperial Beach</b>						
Extremely Low (<=30% AMI)	1,370	275	1,645	1,345	290	1,635
Cost Burden >30%	88.0%	60.0%	83.3%	76.6%	63.8%	74.3%
%Cost Burden >30%	82.8%	52.7%	77.8%	66.9%	48.3%	63.6%
Very Low (>30% to <=50% AMI)	1,140	334	1,474	1,305	275	1,580
Cost Burden >30%	93.9%	38.6%	81.3%	86.5%	51.6%	80.4%
%Cost Burden >30%	46.1%	26.6%	41.7%	36.4%	47.3%	38.3%
Low (>50% to <=80% AMI)	1,805	480	2,285	1,610	440	2,050
Cost Burden >30%	57.3%	44.8%	54.7%	60.2%	32.7%	54.3%
%Cost Burden >30%	3.8%	37.5%	10.9%	12.1%	19.1%	13.6%
Moderate & Above Moderate (>80% AMI)	2,000	1,745	3,745	1,765	1,790	3,555
Cost Burden >30%	11.0%	29.2%	19.5%	5.8%	25.0%	15.5%
%Cost Burden >30%	0.8%	7.2%	3.7%	0.2%	3.8%	2.0%
<b>Total</b>	<b>6,315</b>	<b>2,834</b>	<b>9,149</b>	<b>6,025</b>	<b>2,795</b>	<b>8,820</b>
Cost Burden >30%	55.9%	36.0%	49.7%	53.6%	32.9%	47.1%
%Cost Burden >30%	27.6%	19.0%	25.0%	26.1%	15.1%	22.6%
<b>San Diego County</b>						
Extremely Low (<=30% AMI)	97,650	39,285	136,935	110,830	44,225	155,055
Cost Burden >30%	81.1%	70.9%	78.2%	78.7%	68.1%	75.7%
%Cost Burden >30%	70.5%	59.0%	67.2%	68.8%	55.9%	65.1%
Very Low (>30% to <=50% AMI)	79,480	44,845	124,325	89,665	47,220	136,885
Cost Burden >30%	85.7%	63.6%	77.7%	86.7%	61.5%	78.0%
%Cost Burden >30%	43.9%	46.7%	44.9%	47.1%	40.6%	44.9%
Low (>50% to <=80% AMI)	100,320	83,070	183,390	105,495	80,675	186,170
Cost Burden >30%	62.0%	59.4%	60.8%	62.5%	53.8%	58.7%
%Cost Burden >30%	13.8%	36.3%	24.0%	15.4%	25.1%	19.6%
Moderate & Above Moderate (>80% AMI)	190,390	426,745	617,135	216,595	417,025	633,620
Cost Burden >30%	17.3%	34.1%	28.9%	18.9%	20.2%	19.8%
%Cost Burden >30%	1.4%	8.6%	6.3%	1.3%	3.5%	2.8%
<b>Total</b>	<b>467,840</b>	<b>593,945</b>	<b>1,061,785</b>	<b>522,585</b>	<b>589,145</b>	<b>1,111,730</b>
Cost Burden >30%	51.8%	42.3%	46.5%	52.0%	31.7%	41.3%
%Cost Burden >30%	25.7%	18.7%	21.8%	26.3%	13.4%	19.4%
<p><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></p> <p><i>Source: CHAS (2006-2010) and (2013-2017).</i></p>						

## 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), farmworkers, and the homeless (Table H-15). 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	2,072	--	--	--	--	22.6%
Senior Headed Households	1,566	954	60.9%	612	39.1%	17.1%
Seniors Living Alone	641	308	48.0%	333	52.0%	7.0%
Persons with Disabilities	3,102					11.7%
Large Households	1,243	347	27.9%	896	72.1%	13.5%
Single-Parent Households	1,303	--	--	--	--	14.2%
Female Headed Households with children	922	--	--	--	--	10.0%
Farmworkers*	26	--	--	--	--	0.2%
Homeless	16	--	--	--	--	0.06%

\*= Category includes civilians employed in the "agriculture, forestry, fishing and hunting, and mining" industry as reported in the ACS.  
Sources: American Community Survey (2014-2018 Estimates), Regional Task Force on the Homeless (2020), California Department of Finance (2019).

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-16 shows that 2,902 persons were age 65 and over in Imperial Beach in 2018. This accounted for about 11 percent of residents, lower than the percentage found in the County (13 percent). Furthermore, 17 percent of City households were headed by someone 65 years old or older (Table H-16). Of these senior-headed households, the majority (61 percent) owned their homes, while the remainder (39 percent) rented their homes. Housing cost burden has a greater impact on lower income elderly renters. According to CHAS data, 57 percent of elderly renter-households were cost burdened, paying more than 30 percent of their gross income on housing between 2013 and 2017 ( Table H-12). This data however, does not differentiate those who were cost burdened due to low income, or those cost burdened due to high cost of housing, or both.

Aside from cost burden problems faced by seniors due to their relatively fixed incomes, many seniors also live with various disabilities. Roughly 42 percent of Imperial Beach’s senior population was estimated as having one or more disabilities by the 2014-2018 ACS. Among these disabilities, the most common were ambulatory difficulties (69 percent) that limited/prevented seniors from going outside the home and hearing difficulties (39 percent).

<b>Jurisdiction</b>	<b>Total</b>	<b>Age 65+</b>	<b>Percent Age 65+</b>
Chula Vista	266,468	32,212	12.1%
Coronado	23,620	4,656	19.7%
El Cajon	103,285	12,341	11.9%
<b>Imperial Beach</b>	<b>27,290</b>	<b>2,902</b>	10.6%
La Mesa	59,562	8,590	14.4%
Lemon Grove	26,767	3,448	12.9%
National City	60,896	7,643	12.6%
San Diego	1,401,932	171,804	12.3%
Santee	57,615	8,190	14.2%
San Diego County	3,302,833	439,595	13.3%

*Source: American Community Survey (2014-2018 Estimates)*

**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.

One licensed residential care facility for the elderly is located in Imperial Beach as of May 2020. This facility provides a total of 32 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**

According to 2014-2018 ACS data, approximately 12 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, ambulatory, cognitive, and independent living difficulties were the most prevalent. However, among the elderly population, ambulatory and hearing difficulties were most prevalent (Table H-17).

Disability Type	% of Disabilities Tallied			
	Under 18 years	Age 18 to 64	Age 65+	Total
With a hearing difficulty	33.70%	16.99%	20.7%	26.85%
With a vision difficulty	11.41%	19.18%	3.5%	20.37%
With a cognitive difficulty	60.87%	44.11%	12.4%	38.91%
With an ambulatory difficulty	10.87%	52.81%	28.6%	56.80%
With a self-care difficulty	5.43%	27.95%	12.8%	23.89%
With an independent living difficulty		47.54%	22.0%	39.49%
<b>Total Disabled Persons</b>	<b>184</b>	<b>1,689</b>	<b>2,182</b>	<b>3,102</b>
<i>Note: A person can have multiple disabilities.</i>				
<i>Source: American Community Survey (2014-2018 Estimates).</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 State law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 18;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

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 421 persons in the City of Imperial Beach with developmental disabilities, based on the California Department of Finance 2020 population estimates.

According to the State’s Department of Developmental Services, approximately 247 persons with developmental disabilities sought out services in the City of Imperial Beach in June 2019. Most of these individuals (91 percent) reside in a private home with their parent or guardian and 57 percent 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. Housing that applies universal design principles<sup>4</sup> is considered barrier free and accessible to persons of a wide range of abilities/disabilities.

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.<sup>5</sup> The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. 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. In 2016, the City adopted a formal procedure for review and approval of reasonable accommodation requests (Ordinance No. 2016-1155).

### 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 2014-2018 ACS estimates, 1,243 of Imperial Beach City households were large households. Table H-18 compares the number of large households in Imperial Beach to that of San Diego County. In 2018, about 14 percent of households in Imperial Beach consisted of five or more persons, slightly higher than the regional proportion of 12 percent.

Jurisdiction	Persons in Household			Total Households
	5	6	7+	
Imperial Beach	788	220	235	9,175
Percent of Total	8.6%	2.4%	2.6%	100.0%
San Diego Region	78,930	32,607	21,051	1,118,980
Percent of Total	7.1%	2.9%	1.9%	100.0%

*Source: American Community Survey (2014-2018 Estimates).*

<sup>4</sup> The seven principles of universal design are: Equitable Use; Flexibility in Use; Simple and Intuitive Use; Perceptible Information; Tolerance for Error; Low Physical Effort; and Size and Space for Approach and use.

<sup>5</sup> The State of California regulates accessibility through Title 24 of the California Building Standards Code and federal Americans with Disabilities Act mandate residential accessibility requirements.

The 2014-2018 ACS estimated that 3,297 housing units in Imperial Beach had three or more bedrooms. Of these units, 41 percent (1,358) were rental units and 59 percent (1,939) were owner-occupied. Four- or more bedroom units represented only nine percent of all occupied housing (four percent of all rental units and 20 percent of all owner-occupied units) in Imperial Beach. While it appears that there are enough units (3,297) to accommodate the number of large households (1,243), it is likely that some of these large units are not occupied by large households.

Table H-19 provides a breakdown of the incidence of housing problems among larger households by income and tenure between 2013 and 2017. Housing problems can be defined as cost burden greater than 30 percent of income, and/or overcrowding, and/or without complete kitchen or plumbing facilities. A greater percentage of large households (73 percent) had housing problems compared to all households (52 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 (86 percent) had one or more housing problems, while just over 43 percent of owner-occupied large households had one or more housing problems.

Household by Type, Income, & Housing Problem	Renters		Owners		Total Large Households	Total Households
	Large Related (5 or more members)	Total Renters	Large Related (5 or more members)	Total Owners		
Household Income <=30% AMI	120	1,345	0	290	120	1,635
With any housing problems	100.0%	78.8%	-	62.1%	100.0%	75.8%
Household Income >30 to <=50% AMI	205	1,305	10	275	215	1,580
With any housing problems	100.0%	89.7%	0.0%	54.5%	95.3%	83.5%
Household Income >50 to <=80% AMI	245	1,610	70	440	315	2,050
With any housing problems	95.9%	71.7%	21.4%	34.1%	79.4%	63.7%
Household Income >80% AMI	190	1,765	255	1,790	445	3,555
With any housing problems	47.4%	13.6%	51.0%	27.9%	49.4%	20.8%
<b>Total Households</b>	<b>760</b>	<b>6,025</b>	<b>335</b>	<b>2,795</b>	<b>1,095</b>	<b>8,820</b>
With any housing problems	85.5%	60.2%	43.3%	35.1%	72.6%	52.2%

*Note: Totals may not match other ACS 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 (2013-2017).*

## **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 recommended providing density incentive to mixed use projects that include large units (with three or more bedrooms). On August 2012, the City adopted a Commercial Zoning Amendment (Ordinance No. 2012-1130) that permitted an increased maximum density for multi-family residential units if the development met at least two development incentives. The development incentives included that at least twenty-five percent of proposed residential units are three-bedroom units.

## 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.

Between 2014 and 2018, an estimated 1,303 households (14 percent) of Imperial Beach households were headed by single parents (Table H-20); the large majority of which were headed by females (71 percent). The 2014-2018 ACS reported that 53 percent of female-headed families with children had incomes below the poverty level. While female-headed households approximately 70 percent of the single-parent households in Imperial Beach and San Diego County (Table H-20), the proportion of female-headed households living below the poverty is higher in Imperial Beach (61 percent) compared to the County (45 percent). Moreover, a higher proportion of female-headed households with children under the age of 18 are living below the poverty line in Imperial Beach (53 percent) compared to 37 percent in the County.

	<b>Imperial Beach</b>	<b>San Diego County</b>
Total Households	9,175	1,118,980
Single-Parent HHs	1,303	92,411
% Single-Parent HHs	14%	8%
Female-Headed HHs	922	66,423
% Female-Headed HHs	71%	72%
Female Headed HHs living below poverty level	563	29,804
% Female-Headed HHs living below poverty level	61%	45%
Female-Headed HHs with Children living below poverty level	490	24,628
% Female-Headed HHs with Children living below poverty level	53%	37%
<i>HHs = Households</i>		
<i>Source: American Community Survey (2014-2018 Estimates)</i>		

### Resources

Lower-income single-parent households can benefit from County 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, farm workers earned an average annual salary of \$32,872 (Table H-6).<sup>6</sup> This limited income is exacerbated by their tenuous and/or seasonal employment status. According to the 2014-2018 ACS, 26 persons in the City of Imperial Beach were employed in the agriculture, forestry, fishing, hunting, and

<sup>6</sup> California Employment Development Department, Occupational Wage Data (1st Quarter, 2019).

mining industry. The Imperial Beach farmworker population accounts for 0.2 percent of the County's 13,471 population employed in agriculture, forestry, fishing and hunting, and mining. However, the San Diego County's Farm Bureau has a lower estimate of farmworkers in the San Diego region at approximately 5,000 farmers.

The Farm Bureau reports that San Diego County surpasses other urbanized counties in terms of average dollar value per acre. While it is the 19<sup>th</sup> largest farm economy among 3,000 counties in the country, farmland in San Diego region is concentrated in the northern portion of the County, according to the Farmland Mapping and Monitoring Program of the California Department of Conservation.<sup>7</sup> With farming activities not being located near Imperial Beach, there is a lower need for farmworker housing in the City.

### **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:

- Individuals/families who lack a fixed, regular, and adequate nighttime residence, including:
  - Place not meant for human habitation;
  - Living in a shelter; or
  - Exiting an institution.
- Individuals/families who will imminently (within 14 days) lose their primary nighttime residence.
- Unaccompanied youth (under 25 years of age) or families with children/youth.
- Individuals/families fleeing or attempting to flee domestic violence.

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

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<sup>7</sup> <https://maps.conservation.ca.gov/DLRP/CIFF/>

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 23, 2020 and the results are shown in Table H-21. 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 16 homeless persons.

<b>Jurisdiction</b>	<b>Total</b>
Chula Vista	313
Coronado	16
El Cajon	784
<b>Imperial Beach</b>	<b>16</b>
La Mesa	52
Lemon Grove	18
National City	128
Santee	25
San Diego County	7,619
<i>Source: Regional Housing Task Force on the Homeless (2020).</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 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/MU-1 zone. The City is working with nonprofits and churches to identify ways to provide temporary housing and shelter for the homeless.

## **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 2000. The housing stock in the City grew from 9,739 units in 2000 to 10,146 units in 2020, or a four-percent increase over 20 years (Table H-22). Similarly

limited housing growth occurred in Coronado, El Cajon, and Lemon Grove during this period with modest growth in La Mesa, National City, Santee, and San Diego City. Housing growth in neighboring Chula Vista significantly outpaced County growth over the past 20 years (46 percent versus 18 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 2000, has little remaining vacant land for large-scale development.

**Table H-22: Housing Unit Growth (2000-2020)**

Jurisdiction	2000	2010	2020	Percent Change		
				2000-2010	2010-2020	2000-2010
Chula Vista	59,495	79,416	86,785	33.5%	9.3%	45.9%
Coronado	9,522	9,634	9,740	1.2%	1.1%	2.3%
El Cajon	35,190	35,850	36,282	1.9%	1.2%	3.1%
<b>Imperial Beach</b>	<b>9,739</b>	<b>9,882</b>	<b>10,146</b>	<b>1.5%</b>	<b>2.7%</b>	<b>4.2%</b>
La Mesa	24,943	26,167	26,929	4.9%	2.9%	8.0%
Lemon Grove	8,722	8,868	9,139	1.7%	3.1%	4.8%
National City	15,422	16,762	17,290	8.7%	3.1%	12.1%
San Diego City	469,689	516,033	549,070	9.9%	6.4%	16.9%
Santee	18,833	20,048	21,248	6.5%	6.0%	12.8%
San Diego County	1,040,149	1,164,786	1,226,879	12.0%	5.3%	18.0%

Source: Bureau of the Census (2000,2010) & California Department of Finance, (2020).

## 2.5.2 Projected Housing Units

Table H-23 shows that SANDAG expects the housing stock in Imperial Beach to increase by eight percent between 2020 and 2035. County-wide, however, the housing stock is expected to increase by approximately 14 percent. Between 2020 and 2050, the Imperial Beach housing stock is forecast to experience an increase of 14 percent and approximately 22 percent more units could be added in the region. While some South County cities are expected to have slower rates of housing growth compared to the County between 2020 and 2050, National City’s housing growth rate (43 percent) is expected to double that of the County while the Chula Vista, La Mesa, and San Diego City are expected to match the County’s growth rate.

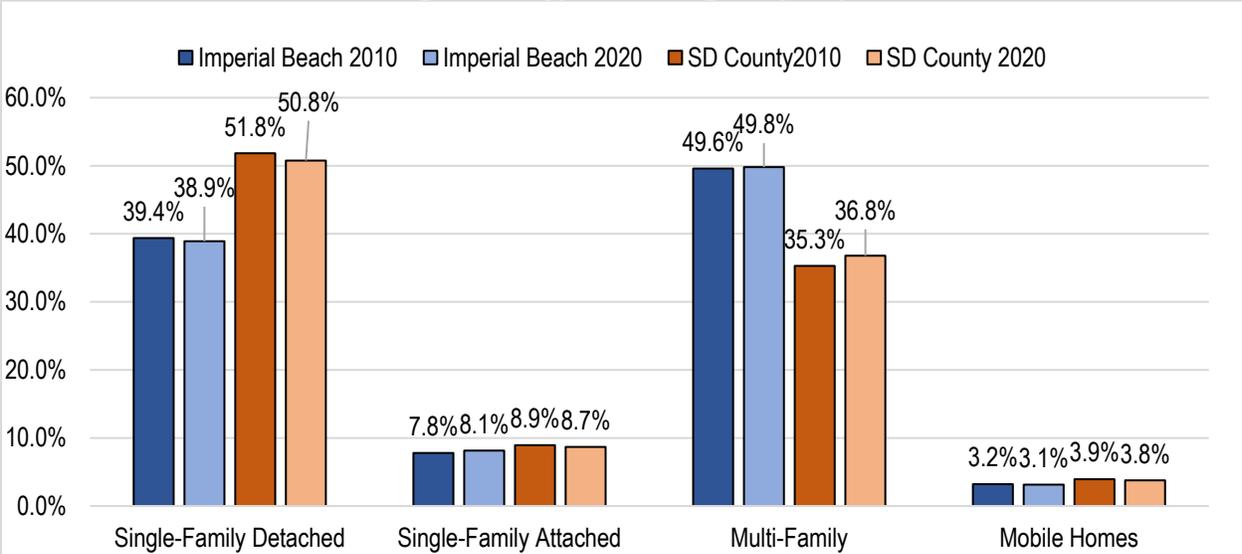
Jurisdiction	2020	2035	2050	Percent Change	
				2020-2035	2020-2050
Chula Vista	86,785	101,188	108,273	16.6%	24.8%
El Cajon	36,282	38,163	40,758	5.2%	12.3%
<b>Imperial Beach</b>	10,146	<b>10,926</b>	<b>11,528</b>	<b>7.7%</b>	<b>13.6%</b>
La Mesa	26,929	30,001	33,407	11.4%	24.1%
Lemon Grove	9,139	9,654	10,526	5.6%	15.2%
National City	17,290	20,877	24,736	20.7%	43.1%
San Diego City	549,070	640,668	695,703	16.7%	26.7%
Santee	21,248	22,776	23,886	7.2%	12.4%
San Diego County	1,226,879	1,394,783	1,491,935	13.7%	21.6%

Sources: American Community Survey (ACS) (2014-2018) and SANDAG Regionwide Forecast (2013).

### 2.5.3 Housing Type

Imperial Beach maintains a diverse housing stock. Figure H-6 shows that in 2020, nearly 58 percent of units in the City were attached units (such as duplexes, triplexes, apartments, and townhomes). Detached single-family homes accounted for 40 percent of housing units. By comparison, nearly half (51 percent) of the County’s housing stock consisted of detached single-family dwellings. As shown in Figure H-6, the housing stock type distribution has not changed much since 2010 (Table H-24). While attached housing products are generally cheaper per unit to construct and often represent more affordable housing options when compared to detached single-family dwellings, the proportion of attached units remains similar in Imperial Beach from 2010 to 2020 (approximately 58 percent for single-family attached and multi-family attached units). Table H-24 shows that SANDAG estimates the composition of Imperial Beach’s housing stock will remain largely unchanged through 2050.

**Figure H-6: Type of Housing Unit (2020)**



Source: California Department of Finance, Housing Estimates (2020).

Housing Type	2010	% of Total	2020 (Estimates)	% of Total	2035 (Projected)	% of Total	2050 (Projected)	% of Total
Single-Family	4,662	47.2%	4,706	47.1%	5,362	49.1%	5,192	45.0%
Multi-Family	4,902	49.6%	5,050	49.8%	5,350	49.0%	6,122	53.1%
Mobile Homes	318	3.2%	318	3.1%	214	2.0%	214	1.9%
<b>Total Housing</b>	<b>9,882</b>	<b>100.0%</b>	<b>10,074</b>	<b>100.0%</b>	<b>10,926</b>	<b>100.0%</b>	<b>11,528</b>	<b>100.0%</b>

*Source: California Department of Finance (2020) and SANDAG Regionwide Forecast (2013).*

## 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 2010, among the City's occupied housing units, approximately 30 percent were owner-occupied, while 70 percent were renter-occupied (Table H-25). The homeownership rate for the City has remained relatively steady over the past decade as little new construction had occurred. According to the 2014-2018 ACS, the tenure distribution in the City remained essentially the same.

Tenure	2010		2018	
	Number	Percent	Number	Percent
Owner-Occupied	2,756	30.2%	2,811	30.6%
Renter-Occupied	6,356	69.8%	6,364	69.4%
<b>Total</b>	<b>9,112</b>	<b>100.0%</b>	<b>9,175</b>	<b>100.0%</b>

*Sources: Bureau of the Census (2010) and American Community Survey (2014-2018 Estimates).*

Table H-26 shows the average household size by tenure. In both 2010 and 2018, the average household size for renter-occupied households was slightly higher than that for owner-occupied households, with the both average household size for owner-occupied households and renter-occupied households trending upward.

Tenure	Average Household Size	
	2010	2018
Owner	2.71	2.79
Renter	2.87	2.96
<b>Total</b>	<b>2.82</b>	<b>2.91</b>

*Sources: Bureau of the Census (2010) and American Community Survey (2014-2018 Estimates)*

**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 2014-2018 ACS, the overall vacancy rate in Imperial Beach was 13 percent, including units vacant for seasonal or occasional use, rented and sold units that were vacant at the time of the survey, and other unclassified vacant units. The vacancy rate for units available for sale or rent was 1.2 percent and 2.3 percent, respectively.

Additional vacancy information was obtained for Spring 2019 from the San Diego County Apartment Association (SDCAA) and is shown in Table H-27. Vacancy rates in Imperial Beach were higher 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	3.1%	3,333	104	4.1%	684	28
Coronado	0.0%	2	0	0.0%	2	0
El Cajon	5.1%	2,043	104	5.3%	1,874	100
<b>Imperial Beach</b>	<b>5.9%</b>	<b>17</b>	<b>1</b>	<b>5.9%</b>	<b>17</b>	<b>1</b>
La Mesa	3.6%	938	34	4.3%	533	23
Lemon Grove	4.3%	70	3	4.3%	70	3
National City	1.3%	154	2	13.0%	154	2
Santee	3.7%	656	24	5.7%	263	15
East County San Diego	4.3%	3,893	167	5.0%	2,797	141
San Diego County	4.1%	23,000	936	--	--	--

*Source: San Diego County Apartment Association Survey (Spring 2019).*

**2.5.5 Housing Age and Condition**

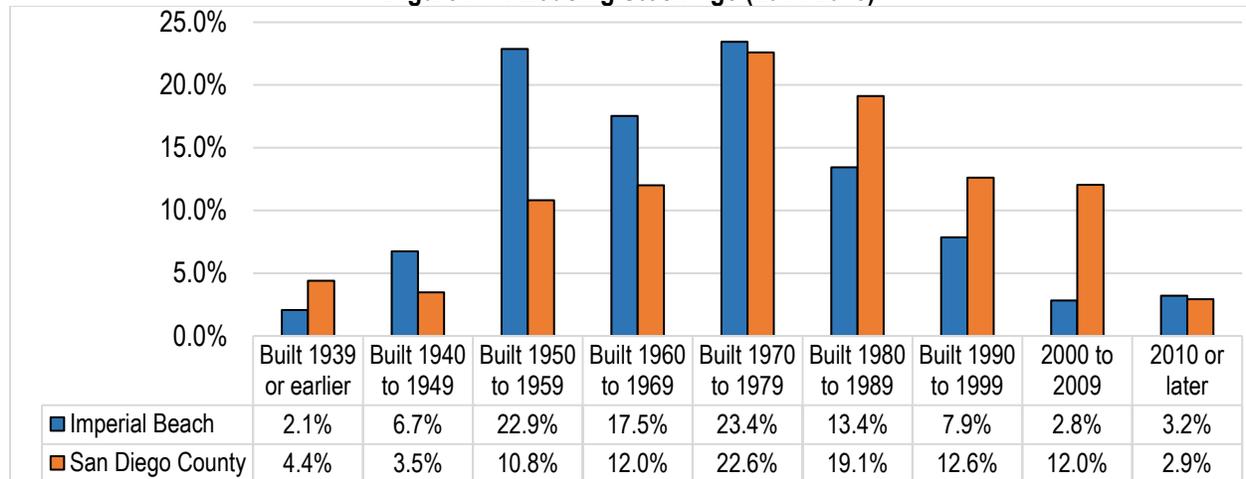
Housing age can be an important indicator of housing condition within a community. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs 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. The City estimates that about 7 percent of homes (710 units) in Imperial Beach are in substandard condition. This figure is based on a report from the National Center for Healthy Housing<sup>8</sup>, which measures “basic housing quality” throughout the nation. The basic housing quality metric is based

<sup>8</sup> The data for this report is based on data collected by the U.S. Census Bureau American Housing Survey (AHS).

on the percentage of homes with “severe” or “moderate” housing problems. In the San Diego Metropolitan Service Area, the basic housing quality statistic is 7.2 percent. While the City does not offer a rehabilitation program, residents can access the County’s Housing Repair Loans and Grants Program (Program 1), and the City will assist in promoting the County’s program to potentially eligible residents.

Imperial Beach’s housing stock is significantly older than the County’s housing stock (Figure H-7) about 86 percent of the City’s housing stock was constructed over 30 years ago, while 72 percent of the County’s housing stock is of this age.

**Figure H-7: Housing Stock Age (2014-2018)**



Sources: American Community Survey (2014-2018 Estimates)

## 2.5.6 Housing Cost and Affordability

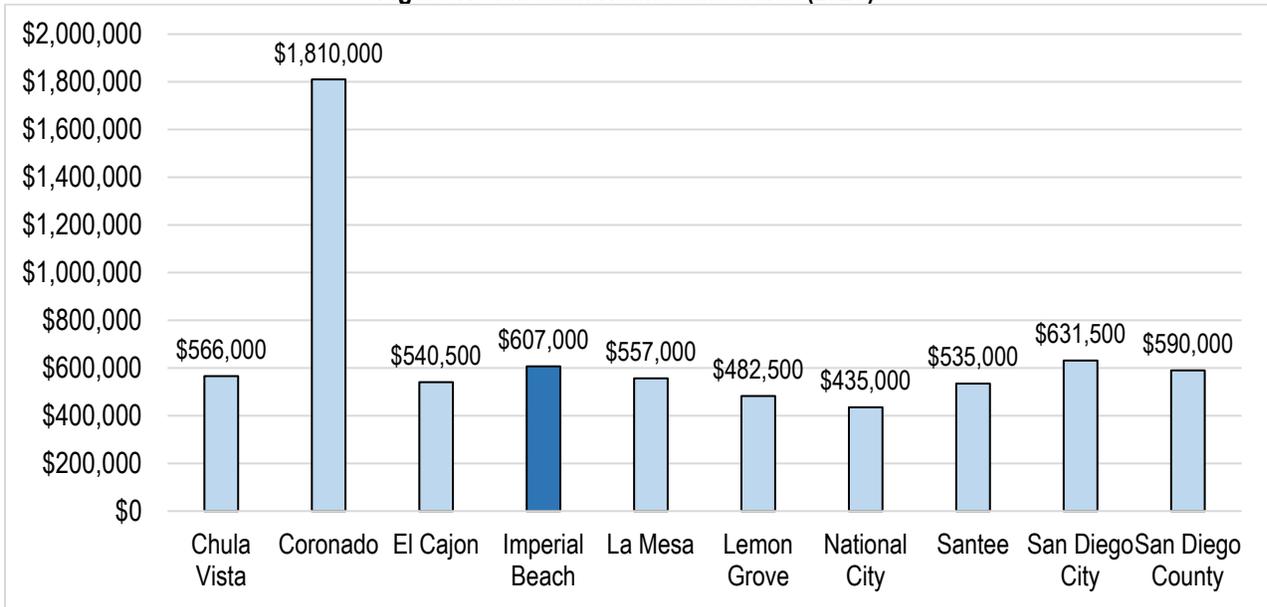
Housing costs can indicate whether housing is accessible to all economic segments of the community. This section summarizes the cost and affordability of the housing stock to Imperial Beach residents.

### **Home Ownership Market**

Median home prices in the South and East County areas of San Diego ranged from \$435,000 in National City to \$631,000 in the City of San Diego (Figure H-8). Imperial Beach’s median home price fell on the higher end of the spectrum at \$607,000, just above the San Diego County median price of \$590,000.

Median home sale prices in Imperial Beach more than doubled between 2010 and 2020 (Table H-28) – the highest percent increase among cities in south and east San Diego County. All other southern and eastern San Diego cities also saw increases in median home prices during this time period, though not more than 100 percent except for the cities of Lemon Grove and National City.

**Figure H-8: Median Home Sales Price (2020)**



Source: CoreLogic (March 2020).

**Table H-28: Changes in Median Home Sale Prices (2010-2020)**

Jurisdiction	2010		2020		Percent Change in Median Sale Price
	Number Sold	Price	Number Sold	Price	
Chula Vista	3,461	\$315,000	255	\$566,000	80%
Coronado	248	\$1,100,000	37	\$1,810,000	65%
El Cajon	1,575	\$268,000	169	\$540,500	88%
<b>Imperial Beach</b>	<b>202</b>	<b>\$240,000</b>	<b>15</b>	<b>\$607,000</b>	<b>153%</b>
La Mesa	725	\$321,500	76	\$557,000	73%
Lemon Grove	277	\$240,000	26	\$482,500	101%
National City	391	\$201,000	23	\$435,000	116%
Santee	752	\$315,000	81	\$535,000	70%
San Diego City	14,497	\$341,000	1,209	\$631,500	85%
San Diego County	36,414	\$330,000	3,360	\$590,000	79%

Source: DQNews (2011) and CoreLogic (March 2020).

### **Rental Market**

The primary source of information on rental costs in the San Diego region is the San Diego County Apartment Association (SDCAA), which conducts survey of rental properties periodically. Table H-29 shows that in the fall of 2019, average monthly rents in Imperial Beach ranged from \$1,218 for a one-bedroom apartment to \$1,796 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-29: Average Monthly Rent (2019)						
Zip Code	Unit Type	Fall 2019 Units/Properties Surveyed	Fall 2019 Monthly Rent	Fall 2019 Rent/Sq. Foot	Spring 2019 Monthly Rent	Fall 2018 Monthly Rent
Chula Vista	Studio	8/3	\$1,184	\$2.71	\$1,334	\$1,210
	1 BR	1069/27	\$1,593	\$2.31	\$1,487	\$1,539
	2 BR	1433/28	\$1,916	\$1.91	\$1,820	\$1,850
	3+ BR	410/12	\$2,726	\$1.83	\$2,213	\$2,299
Coronado	Studio	0/0	\$0	\$0.00	\$0	\$0
	1 BR	1/1	\$0	\$0.00	\$1,825	\$1,404
	2 BR	0/0	\$0	\$0.00	\$0	\$0
	3+ BR	0/0	\$0	\$0.00	\$3,150	\$0
El Cajon	Studio	1/1	\$1,000	\$2.50	\$1,187	\$752
	1 BR	352/4	\$1,863	\$2.83	\$1,495	\$1,724
	2 BR	694/13	\$1,941	\$2.14	\$1,663	\$1,728
	3+ BR	135/2	\$2,270	\$2.22	\$2,169	\$2,185
Imperial Beach	<b>Studio</b>	0/0	\$0	\$0.00	\$450	\$0
	<b>1 BR</b>	80/4	\$1,218	\$1.80	\$1,383	\$1,517
	<b>2 BR</b>	94/5	\$1,496	\$1.88	\$1,200	\$1,500
	<b>3+ BR</b>	7/4	\$1,796	\$1.61	\$1,465	\$1,683
La Mesa	Studio	0/0	\$0	\$0.00	\$1,419	\$1,168
	1 BR	639/11	\$1,798	\$2.59	\$1,526	\$1,568
	2 BR	819/13	\$2,271	\$2.19	\$1,826	\$1,968
	3+ BR	116/2	\$2,597	\$1.94	\$2,352	\$2,397
Lemon Grove	Studio	0/0	\$0	\$0.00	\$913	\$891
	1 BR	0/0	\$0	\$0.00	\$963	\$1,030
	2 BR	25/3	\$1,298	\$1.45	\$1,600	\$1,282
	3+ BR	6/1	\$1,695	\$1.71	\$1,558	\$0
National City	Studio	0/0	\$0	\$0.00	\$0	\$0
	1 BR	30/5	\$1,305	\$2.06	\$1,005	\$0
	2 BR	21/7	\$1,429	\$1,074.00	\$1,567	\$1,075
	3+ BR	1/1	\$1,750	\$1.76	\$1,750	\$1,900
Santee	Studio	0/0	\$0	\$0.00	\$0	\$0
	1 BR	272/4	\$1,672	\$2.52	\$1,552	\$1,599
	2 BR	575/6	\$1,963	\$2.10	\$1,811	\$1,740
	3+ BR	101/3	\$2,365	\$2.50	\$1,983	\$1,737
City of San Diego	Studio	189/20	\$1,526	\$3.46	\$1,367	\$1,433
	1 BR	3003/113	\$1,881	\$2.74	\$1,845	\$1,825
	2 BR	4610/140	\$2,241	\$2.07	\$2,241	\$2,172
	3+ BR	795/52	\$2,460	\$1.96	\$2,753	\$2,637
County of San Diego (including City of San Diego)	Studio	408/38	\$1,342	\$2.84	\$1,315	-
	1 BR	6592/208	\$1,666	\$2.45	\$1,684	-
	2 BR	10292/280	\$2,013	\$2.07	\$2,071	-
	3+ BR	1766/201	\$2,483	\$1.94	\$2,526	-

Source: San Diego County Apartment Association Survey (Fall 2019, Spring 2019)

### ***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. According to HUD's Comprehensive Housing Affordability Strategy (CHAS) data, as of 2017, the income distribution of Imperial Beach households was as follows (See Table H-10):

- 18.5 percent – Extremely low income
- 18.0 percent- Very Low Income
- 23.1 percent- Low Income
- 40.4 percent- Moderate or Above Moderate

The maximum affordable home and rental prices for residents in San Diego County are shown in Table H-30. This amount can be compared to current housing asking prices (Table H-28) and market rental rates (Table H-29) 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 \$24,300 for a one-person household and up to \$37,450 for a five-person household in 2020. An extremely low income household can generally afford homes offered at prices between \$60,846 and \$68,801, adjusting for household size. After deductions for utilities, a one-person extremely low income household could afford to pay up to \$444 in rent per month and a five-person low income household could afford to pay as much as \$589. 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 \$40,450 for a one-person household and up to \$62,400 for a five-person household in 2020. A very low income household can generally afford homes offered at prices between \$130,009 and \$175,652, 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 without assuming a cost burden.

#### Low Income Households

Low income households earn between 51 percent and 80 percent of the County AMI - up to \$64,700 for a one-person household and up to \$99,800 for a five-person household in 2020. The affordable home price for a low income household at the maximum income limit ranges from \$233,862 to \$335,821. Based on the average home sale price of \$607,000 in 2020 (Table H-28), 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 \$1,454 in rent per month

and a five-person low income household could afford to pay as much as \$2,148. Low income households in Imperial Beach would be able to find adequately sized affordable apartment units (Table H-29), 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 \$120,150 depending on household size in 2020. The maximum affordable home price for a moderate income household is \$290,392 for a one-person household and \$422,971 for a five-person family. Moderate income households in Imperial Beach should are not able to afford adequately-sized homes. The maximum affordable rent payment for moderate income households is between \$1,784 and \$2,656 per month. Appropriately-sized market-rate rental housing is generally affordable to households in this income group.

Table H-30: Affordable Housing Costs (2020)								
Annual Income	Affordable Housing Cost		Utilities, Taxes and Insurance			Affordable Price		
	Rent	Own	Rent	Own*	Taxes, Insurance, HOA	Rent	Own	
<b>Extremely Low Income (30% of AMI)</b>								
1-Person	\$24,300	\$608	\$608	\$164	\$377	\$213	\$444	\$60,846
2-Person	\$27,750	\$694	\$694	\$198	\$440	\$243	\$496	\$66,792
3-Person	\$31,200	\$780	\$780	\$240	\$513	\$273	\$541	\$70,498
4-Person	\$34,450	\$866	\$866	\$283	\$586	\$301	\$583	\$73,809
5-Person	\$37,450	\$936	\$936	\$348	\$675	\$328	\$589	\$68,801
<b>Very Low Income (50% of AMI)</b>								
1-Person	\$40,450	\$1,011	\$1,011	\$164	\$518	\$354	\$847	\$130,009
2-Person	\$46,200	\$1,155	\$1,155	\$198	\$602	\$404	\$958	\$145,806
3-Person	\$52,000	\$1,300	\$1,300	\$240	\$695	\$455	\$1,061	\$159,576
4-Person	\$57,750	\$1,444	\$1,444	\$283	\$788	\$505	\$1,161	\$172,736
5-Person	\$62,400	\$1,560	\$1,560	\$348	\$894	\$546	\$1,213	\$175,652
<b>Low Income (80% of AMI)</b>								
1-Person	\$64,700	\$1,618	\$1,618	\$164	\$730	\$566	\$1,454	\$233,862
2-Person	\$73,950	\$1,849	\$1,849	\$198	\$845	\$647	\$1,651	\$264,647
3-Person	\$83,200	\$2,080	\$2,080	\$240	\$968	\$728	\$1,841	\$293,192
4-Person	\$92,400	\$2,310	\$2,310	\$283	\$1,092	\$809	\$2,027	\$321,128
5-Person	\$99,800	\$2,495	\$2,495	\$348	\$1,221	\$873	\$2,148	\$335,821
<b>Moderate Income (120% of AMI)</b>								
1-Person	\$77,900	\$1,948	\$1,948	\$164	\$846	\$682	\$1,784	\$290,392
2-Person	\$89,000	\$2,225	\$2,225	\$198	\$976	\$779	\$2,028	\$329,100
3-Person	\$100,150	\$2,504	\$2,504	\$240	\$1,116	\$876	\$2,264	\$365,782
4-Person	\$111,250	\$2,781	\$2,781	\$283	\$1,256	\$973	\$2,498	\$401,855
5-Person	\$120,150	\$3,004	\$3,004	\$348	\$1,399	\$1,051	\$2,656	\$422,971
Source: California Department of Housing and Community Development, 2020 Income limits; and Veronica Tam and Associates Assumptions: 2020 HCD income limits; 30% gross household income as affordable housing cost; 35% of monthly affordable cost for taxes and insurance; 10% down payment; and 3% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on San Diego County Utility Allowance (April 2020). *Includes utilities, taxes, insurance, and HOA.								

## 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 April 15, 2021 through April 15, 2031.

### 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-31 provides a summary listing of affordable projects

in the City. Overall, six projects (totaling 189 rental housing units) in the City include 186 affordable units.

<b>Project Name</b>	<b>Total Units</b>	<b>Assisted Units</b>	<b>Funding Source</b>	<b>Earliest Date of Conversion</b>
American Legion	30	29	Redevelopment funds	2068
Casa Estable I (1360 Hemlock Ave.)	7	7	County and City funds	Perpetuity
Casa Estable II (1260 Calla Ave.)	8	8	County and City funds	2051
Beachwind Apartments (624 12th Street)	15	14	Redevelopment Set-Aside funds	2063
St. James Plaza	99	99	HUD Section 202/Section 8	2035
American Legion Post	30	29	Density Bonus	2040
<b>Total</b>	<b>189</b>	<b>186</b>		

*Source: City of Imperial Beach Housing Element (2013-2021) and HUD Multifamily Assistance & Section 8 Database (2020).*

## **2.6.2 Preservation of At-Risk Housing**

Within the 2021-2029 “at-risk” housing analysis period, no projects are considered at risk of converting to market-rate housing.

### ***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. Since there are no “at-risk” units, these options are not discussed in detail.

## **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 began to keep construction and demolition records for the Coastal Zone in 2013.

### ***New Construction***

The last housing element estimated 1,125 units were built in the Coastal Zone between 1982 and 2011. Since 2013, when the City began to keep records of housing activity in the Coastal Zone, 276 new units were built in the Coastal Zone. These new construction units include units that were built on vacant land or where existing structures were demolished and new ones were built. Between 2013 and 2020:

- 15 ADU units were added
- 26 new housing units were built on empty lots
- 27 new single-family units were built on existing single-family home sites
- 22 new multifamily units were built existing single-family home sites
- 187 new units were built on an existing RV lot
- Seven (7) new single-family units replaced four duplexes

### ***Demolished/Converted Low and Moderate Income Housing***

Between 1982 and 2011, 243 housing units were demolished in the City. Since the City began tracking housing activity in the Coastal Zone in 2013, two sites were converted to be used for

housing for a net gain of 13 housing units. In one project, 11 residential units with commercial space were built in an existing commercial-mixed site (there were 9 existing units, for a net gain of 2 units). For the second project, 11 housing units were built in an existing commercial site (net gain of 11 units).

However, the City did not track the affordability of these units as the coastal replacement housing requirements did not apply.

### ***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

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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, gourmet kitchen, or energy efficiency features) 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. However, a 0.16-acre C/MU-1 lot listed primarily for investment/development value was priced at \$850,000. Most development in Imperial Beach would involve recycling properties with existing uses, adding to the cost of land.

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 Timing and Density**

Market can also constrain the timing between project approval and requests for building permits. In some cases, this may be due to developers' inability to secure financing for construction. In Imperial Beach, the average time between project approval and request for building permit is typically two to six weeks.

As described in the Housing Resources section of this Housing Element, projects tend to be proposed at or close to the maximum available density. As the City offers incentives for projects to achieve maximum density (or exceed it), projects that propose to develop below the allowable density or the density described in the sites inventory are rare. Table H-44 shows recent mixed-use and multi-family residential projects that were approved in Imperial Beach in the past few years.

### **3.1.3 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, 1,342 households applied for mortgage loans for homes in Imperial Beach in 2018 (Table H-32). Of the

applications for conventional purchase loans, 83 percent were approved and 3 percent were denied, and 13 percent were withdrawn or closed for incompleteness. The approval rate for government-backed home purchase loans was lower at 78 percent. More than half (65 percent) of refinance applications were approved. The denial rate was greatest for home improvement loans (40 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.

<b>Loan Type</b>	<b>Total Applicants</b>	<b>Approved</b>	<b>Denied</b>	<b>Other</b>
Government-Backed Purchase	439	77.9%	8.4%	13.7%
Conventional Purchase	277	83.4%	3.2%	13.4%
Refinance	515	64.7%	19.0%	16.3%
Home Improvement	111	50.5%	39.6%	9.9%
<b>Total</b>	<b>1,342</b>	<b>71.7%</b>	<b>14.0%</b>	<b>14.3%</b>

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.lendingpatterns.com](http://www.lendingpatterns.com), 2018.

### **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.

In 2009 San Diego County had a total of 38,308 Notices of Default (NODs) and 15,487 foreclosures, but by 2018 those numbers dropped to 3,239 NODs and 683 foreclosures. In April 2020 there were 16 properties in Imperial Beach in some stage of foreclosure (default, auction, or bank-owned). However, the foreclosure rate in Imperial Beach is lower than San Diego County or California overall, with only 0.01 percent of units in foreclosure, as opposed to 0.03 percent countywide and 0.04 percent statewide.<sup>9</sup>

<sup>9</sup> Realtytrac.com, accessed 2020.

### **3.1.4 Efforts to Address Market Constraints**

The City has taken into consideration market constraints in the development of the sites inventory by selecting sites with characteristics similar to those that have been developed recently. In addition, as described earlier, the City offers density bonuses, incentives, and concessions may also be available to developers who provide affordable housing as part of their projects. 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.

## **3.2 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**

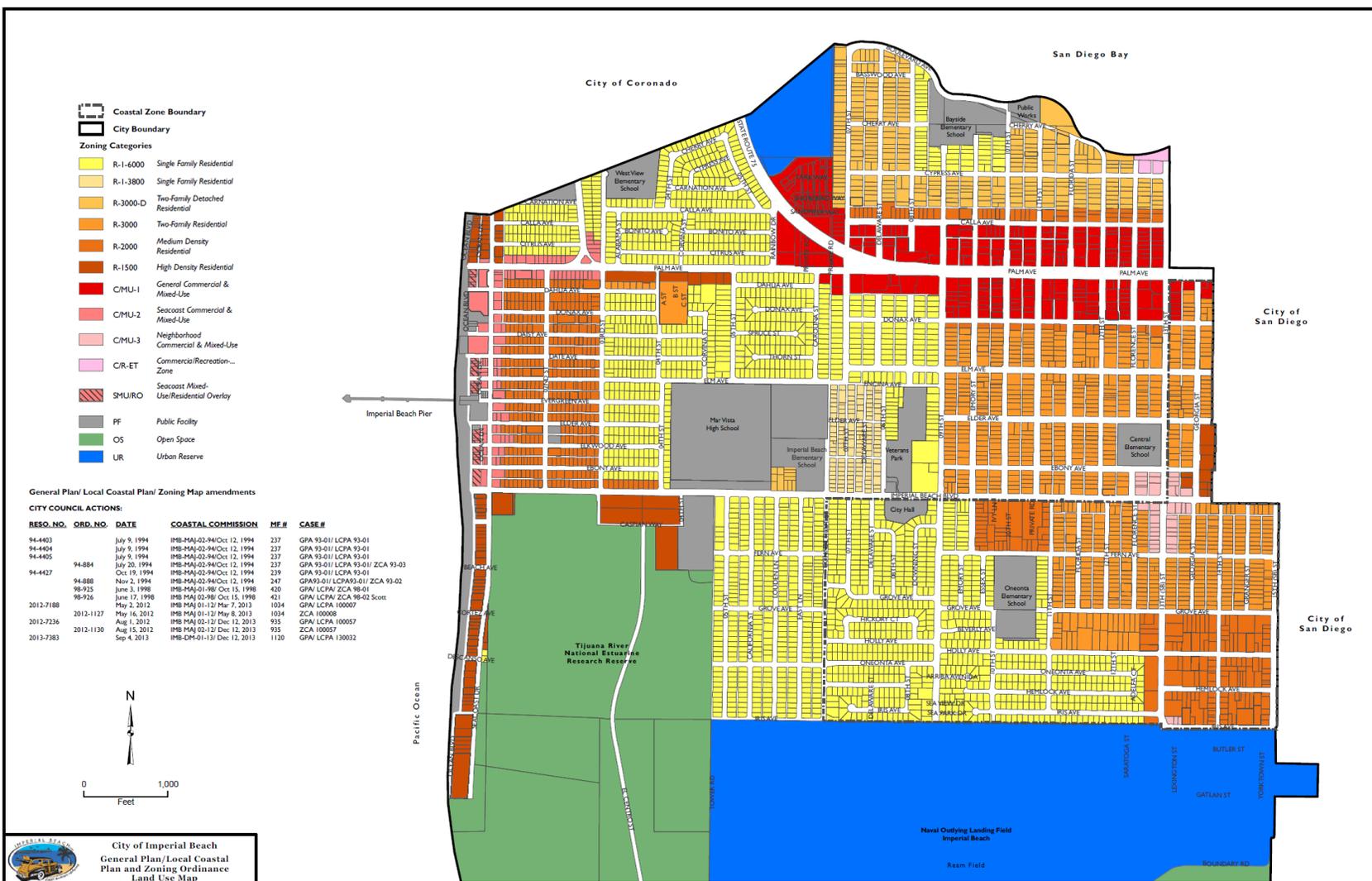
The Imperial Beach General Plan and Zoning Ordinance provide for a range of land use designations/zones in the City that can accommodate residential units. The City’s distribution of land use by zoning is presented in Figure H-9.

<b>General Plan Land Use Designation</b>	<b>Zoning Designation</b>	<b>Max. Density</b>	<b>Description</b>
R-1-6000 Single Family Residential (2 stories)	R-1-6000	7 du/ac	Provides for the development of low density detached single family dwelling units, including mobile homes. 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 (2 stories)	R-1-3800	11 du/ac	Provides for the development of low density detached single family dwelling units, including mobile homes. 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 (2 stories)	R-3000	14 du/ac	Provides for the development of detached and attached single-family dwellings, including mobile homes. 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 (2 stories)	R-3000-D	14 du/ac	The same as R-3000, except attached single-family units are not allowed.
R-2000 Residential (2 stories)	R-2000	21 du/ac	Provides for the development of detached or attached single family and multi-family dwellings, including duplexes, apartments, condominiums, and townhomes. 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. Within the R-2000 area between Seacoast Drive and 4th Street, an additional dwelling unit per lot may be authorized by special 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 (3 stories)	R-1500	29 du/ac	Provides for the development of detached and attached single family and multi-family dwellings, including duplexes, apartments, condominiums, and townhomes. 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/MU-1 General Commercial and Mixed-Use (4 stories)	C/MU-1	43 du/ac	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. Multi-family

**Table H-33: Land Use and Zoning**

General Plan Land Use Designation	Zoning Designation	Max. Density	Description
			residential uses may be permitted. All buildings with frontage along Palm Avenue between 7 <sup>th</sup> St and Florida St are required to provide a minimum of 60 percent of each building's ground floor square footage as "active commercial" use with direct pedestrian access from the Palm Avenue sidewalk or a plaza. Exclusive residential uses must comply with the R-1500 standards.
C/MU-2 Seacoast Commercial and Mixed-Use (3 stories, except for hotels, where 4 stories may be permitted by specific plan)	C/MU-2	29 du/ac – 36 du/ac	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. Multi-family residential and mixed uses may be permitted. Exclusive residential uses must comply with the R-1500 standards.
C/MU-3 Neighborhood Commercial and Mixed-Use (3 stories)	C/MU-3	29 du/ac- 36 du/ac	Provides for mixed-use development, multi-families residential development, and businesses 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. 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.
Seacoast Mixed-Use/Residential Overlay	SMU/RO	29 du/ac- 36 du/ac	Preserves opportunities for the continuation of single-family residential uses, in the area bounded by Ocean Boulevard (the beach) to the west, Ocean Lane on the east, Imperial Beach Boulevard on the south, and Palm Avenue on the north. In this area, single-family land uses are permitted, in addition to all uses permitted within the C/MU-2 designation

Figure H-9: Imperial Beach Zoning Map



### 2.7.3 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-34. These development standards are typical and consistent with standards established in surrounding communities.

Table H-34: Basic Development Standards									
Development Standard	Zoning Designation								
	R-1-6000	R-1-3800	R-3000/ R-3000-D	R-2000	R-1500	C/MU-1	C/MU-2	C/MU-3	SMU/RO
Minimum 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	29-36	29-36	--
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	0-10*	0-5	0-5**
Side	5	10 (5 w/ alley)	5	5	5	5	0-10*	5	5-15**
Rear	10 (5 w/ alley)	10	10 (5 w/ alley)	10 (5 w/ alley)	10 (5 w/ alley)	10	0-10*	10	10
Street Side	10	10	10	10	10	--	--	--	--
Maximum Height (feet)	26/ 2 stories	26/ 2 stories	26/ 2 stories	26/ 2 stories	30/ 3 stories	40/ 4 stories	30/ 3 stories	30/ 3 stories	Single-family: 26/ 2 stories Others: 30/ 3 stories
Open Space (sq. ft. per unit)	300	300	300	300	300	300	300	300	300

Source: City of Imperial Beach, 2020.  
\*Varies by location. \*\*varies by use

### 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. The standards for minimum densities, maximum density in several of the highest density zones are comparable to similar cities within the region, and roughly half of the residential land in the City allows for higher-density residential development. 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. Height requirements in the C/MU-

2 and C/MU-3 are three stories or 30 feet, whichever is less. This has not been found to constrain housing development as projects have been able to achieve three stories without exceptions to the zoning standards. Projects have also been able reach their maximum allowable density within this height standard.

The City adopted an Affordable Housing Density Bonus in 2016 to comply with state density bonus regulations. AB 1763 made a number of changes to density bonus requirements for affordable projects. The bill requires a density bonus to be granted for projects that include 100 percent lower income units, but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Under the revised law, density bonus projects must be allowed four incentives or concessions, and for developments within ½ mile of a major transit stop, a height increase of up to three additional stories or 33 feet. A density bonus of 80 percent is required for most projects, with no limitations on density placed on projects within ½ mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special needs housing, as defined. AB 2345 signed by the Governor in September 2020 further incentivizes the production of affordable housing. The Housing Plan includes a program to amend the zoning ordinance to ensure the affordable housing density bonus regulations conform to current state law.

Within Commercial/Mixed Use 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. Mixed use projects in key locations in the C/MU-2 and C/MU-3 zones that provide at least two development incentives are allowed an increased residential density up to 36 units per acre and an increased building height up to 35 feet. These bonuses are in addition to the required by State Density Bonus law and Affordable Housing density bonuses.

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.

<b>Table H-35: Mixed Use Density Bonus Development Incentives</b>	
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: of Imperial Beach, 2020</i>	

### 3.2.2 Parking Requirements

All residential uses are currently required to provide the number of parking spaces as specified in Table H-36. 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.

<b>Use</b>	<b>Parking Requirement</b>
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
Multi-family Dwelling units in the C/MU-1, C/MU-2, or C/MU-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, 2020</i>	

The City allows shared parking within 1,000 feet, and within the C/MU zones, vertical mixed-use projects are eligible for a 25 percent reduction in overall parking requirement; parking requirements are 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.

R-2000 and R-1500 zones require two spaces per dwelling unit, regardless of number of bedrooms. R-2000 and R-15000 sites tend to be small and have seen a trend of recycling into small complexes. Based on the number of recycling projects seen in these zones, parking requirements are not considered a constraint to development in these zones. Furthermore, 5,998 (99 percent) of the 6,070 developable parcels in the City are located within ½ mile from a major or high frequency transit stop. Therefore, Accessory Dwelling Units (ADUs) are not required to provide parking pursuant to State law. Development of small units is expected to continue both as recycling of existing single-family homes into duplexes and triplexes and as ADUs.

Mixed use multi-family housing in mixed-use zones have lower parking requirements in an effort to incentivize these smaller units in higher density areas. Smaller units or studios are more feasible at higher density.

### 3.2.3 Short-term Rentals

As home-sharing websites have risen in popularity in recent years, there has been a significant increase in the number of homes being offered on a short-term basis to generate rental income. Homes may be offered as "home-shares," where the primary resident offers one or more rooms to visitors while remaining on site, or whole homes may be rented on a daily or weekly basis. While the impact of short-term rentals on housing availability and affordability is still being evaluated, there is evidence that short-term rentals have a negative effect on housing affordability by changing the way residential properties are used and reducing housing availability for local residents.

San Diego County jurisdictions vary in their approach to short-term rentals. Some, particularly coastal cities where short-term rentals are most popular, explicitly allow short-term rentals in at least some zones, typically requiring permits, and specifying that short-term rentals must meet various performance standards to be allowed to operate. For example, the cities Chula Vista, Del Mar, and Solana Beach allow short-term rentals in at least some zones. In contrast, cities such as El Cajon, La Mesa, National City, Santee do not address short-term rentals in their adopted regulations.

At this time, the Zoning Ordinance permits short-term rentals in all commercial/mixed use zones only. As such, they are only found in high-density zones. Short-term rentals in other zones are regularly addressed as a code compliance issue and not permitted to continue to operate. Because short-term rentals are not permitted in most residential zones, they are less likely to present challenges to housing availability. As of the writing of this document, short-term rentals do not pose a constraint to housing development.

### **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-37 summarizes the housing types permitted and conditionally permitted under the Zoning Ordinance.

Uses	R-1-6000	R-1-3800	R-3000/ R-3000-D	R-2000	R-1500	C/MU-1	C/MU-2	C/MU-3
Single-Family	P	P	P/SPR	P/SPR	P/SPR	--	P <sup>1</sup>	--
Multi-Family	--	--	--	SPR	SPR	P <sup>2</sup>	P <sup>2</sup>	P <sup>2</sup>
Manufactured Housing	P	P	P	P	P	--	--	--
Mobile Home Park	CUP	CUP	CUP	CUP	CUP	--	--	--
Emergency Shelter	--	--	--	--	--	P	--	--
Boarding House	--	--	--	--	--	CUP	--	--
Residential Care Facility - 6 or fewer persons	P	P	P	P	P	CUP <sup>5</sup>	CUP <sup>5</sup>	CUP <sup>5</sup>
Mixed Use	--	--	--	--	--	P	P	P
Live/Work Unit <sup>3</sup>	--	--	--	--	--	P	P	P
Senior Housing <sup>4</sup>	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP
Second-Family Units	--	--	P	P	P	--	--	--
Single-Room Occupancy	--	--	--	--	--	CUP	--	--

*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.
3. Live/Work units are also permitted in the Commercial/Recreation-Ecotourism (C/R-ET) zone.
4. Senior citizen housing developments are allowed in all zones.
5. Residential care facilities are currently allowed as nursing/retirement homes in these zones

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-3000-D, 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 (City Council).

### **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 (City Council). Multi-family dwellings are permitted in the C/MU-1, C/MU-2, and C/MU-3 zones with a maximum density of up to 43 units per acre in the C/MU-1 zone and 29 units per acre in the C/MU-2 and C/MU-3 zones. In the C/MU-2 and C/MU-3 zones a density of up to 36 units per acre is allowed in some locations with a Conditional Use Permit. Exclusively residential projects in the C/MU-1 and C/MU-2 must adhere to the R-1500 zoning development standards.

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 318 mobile homes in the City as of January 2020. 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 all residential zones, as are mobile home parks are allowed with a CUP and subject to foundational regulations found in Government Code Section 65852.3.

### ***Emergency Shelters and Low Barrier Navigation Centers***

An emergency shelter is a facility that provides shelter to homeless families and/or homeless individuals on a limited short-term basis. According to the 2020 Point-in-Time Count for San Diego County, there were 16 unsheltered people living in homelessness in Imperial Beach. State law requires emergency shelters to be permitted by right in at least one zone where adequate capacity is available to accommodate at least one year-round shelter. In 2012, the City amended the Zoning Ordinance allow emergency shelters for the homeless as a permitted by-right use without discretionary review in the C/MU1 zone, which generally runs along the Palm Avenue corridor. 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. This zone includes 123 net acres on 321 parcels, many of which are developed with older, low intensity uses. Based on this, the parcels where emergency shelters are allowed by-right are adequate to provide emergency shelters for the unsheltered homeless population living in Imperial Beach. Therefore, adequate capacity exists to accommodate an emergency shelter for at least 16 homeless individuals and at least one year-round emergency shelter. These properties can either be redeveloped or adapted to accommodate emergency shelters.

AB 139 changes the way local governments can regulate parking requirements for emergency shelters. Local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone. The City's Zoning Ordinance does not include specific parking requirements for emergency shelters.

AB 101 requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. A "Low Barrier Navigation Center" is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets a timeline for jurisdictions to act on applications for Low Barrier Navigation Center developments. The requirements of this bill are effective through the end of 2026, at which point they are repealed. The Housing Plan of this Housing Element includes a program to

amend the Zoning Ordinance to allow Low Barrier Navigation Centers by right in areas zoned for mixed use and nonresidential zones permitting multi-family uses.

### ***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 zone. Group homes meeting the definitions and requirements in the Lanterman Developmental Disabilities Services Act are also permitted as 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. The Zoning Ordinance does not include a definition of “residential care facility” but does define “nursing homes,” “retirement homes,” and “boarding houses.” In particular, the definition of boarding house specifically includes “rest homes, sanitariums, convalescent homes, fraternity houses, sorority houses, group homes and other similar operations.”

Historically, Imperial Beach has treated smaller residential care facilities (6 or fewer people) the same as any other residential use, as required by state law. Larger facilities (seven or more people) have been regulated as nursing/retirement homes, which are permitted in all C/MU zones with a CUP. The planning commission may grant a conditional use permit if the commission finds that all of the following facts exist:

- “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. (Ord. 94-884; Ord. 601 § 1, 1983)”

This Housing Element includes a program to adopt a definition of “residential care facility” consistent or reference to the Lanterman Developmental Disability Services Act and clarify regulations for these facilities to be consistent with the requirements of state law.

### ***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 C/MU zones.

### ***Live/Work Units***

Live/Work units are permitted by right in all C/MU zones, as well as within the C/R-ET zone provided 60 percent of the ground floor of parcels with street frontages have active commercial uses.

### ***Senior Housing***

The Zoning Ordinance defines senior housing as a housing development that meets the definition in California Civil Code Section 51.3. This section of the California Civil Code currently defines “senior citizen” as a person 62 years of age or older, or 55 years of age or older in a senior citizen housing development, and “senior citizen development” as a residential development developed, substantially rehabilitated, or substantially renovated for, senior citizens that has at least 35 dwelling units.

Senior housing developments may be approved in all zones with a Conditional Use Permit. These housing developments are exclusively for low- and moderate-income seniors. Because the residents of such developments have dwelling characteristics which often differ from those of families and younger persons, it may not be 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-Family Units (aka Accessory Dwelling Units)***

Second-family 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-family 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.

Changes to State legislation adopted in 2016 (such as AB 2299 and SB 1069) substantially changed the regulations governing the development of Accessory Dwelling Units (previously known as Secondary Dwelling Units), including in coastal cities. Throughout 2015 and 2019, 22 permits for second dwelling units were issued in the City.

More recent state legislation, including AB 68, AB 587, AB 881, and SB 13, address standards and regulations for Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs). The bills modify the fees, application process, and development standards for accessory dwelling units, with the goal of lowering barriers to accessory dwelling unit development and increasing overall numbers of accessory dwelling units. Some of the key provisions include:

- Prohibiting standards related to lot coverage standards, lot size, FAR, or open space that have the effect of limiting ADU development
- Allowing ADUs within or attached to attached garages, storage areas, or accessory structures
- Removing requirements to replace parking when a garage or carport is demolished to develop an ADU
- Eliminate parking requirements for ADUs within a half mile of a transit stop
- Prohibiting maximum sizes for ADUs that are less than 850 sf (1,000 for units with 2+ bedrooms)

The City's Zoning Ordinance does not include specific standards or regulations related to ADUs. The City is in the process of preparing an ADU ordinance to comply with State law. This Housing Element also includes the City's planned actions to promote ADUs.

### ***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 are 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.

### ***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).

California Government Code Sections 65582 defines supportive housing as housing with no limits on the length of stay that is occupied by a “target population” and links this population with the provision of housing and social services. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV/AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

State law requires transitional and supportive housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. Imperial Beach Zoning Ordinance considers transitional and supportive housing a residential use of property, is subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. AB 2162 further requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in these zones. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop Imperial Beach Zoning Ordinance defines transitional and supportive housing in accordance with state law, and allows them subject to the restrictions that apply to other residential dwellings of the same type in the same zone. The Housing Plan of this Housing Element includes a program to amend the Zoning Ordinance to clarify where supportive housing developments are permitted by right, and that there are no minimum parking requirements for supportive housing within ½ mile of public transit.

### ***Farmworker Housing***

As an urbanized community, there is no land within Imperial Beach designated for agricultural use and no zone allows agricultural uses. The 2018 American Community Survey 5-year estimates for Imperial Beach identified only 26 people working in agriculture, forestry, fishing, hunting, and mining in the city. This represents less than one percent of the City’s population. Therefore, the City has no specific need for farmworker housing.

### ***Employee Housing***

The City’s Zoning Ordinance defines employee housing as housing providing accommodations for six or fewer employees. As required by Health and Safety Code Section 17021.5(b), employee housing is deemed a single-family structure with a residential land use designation.

## **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.<sup>10</sup>

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 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

Development in the City is required to meet parking standards for people with disabilities as required by state law, including requirements for the number and design of disabled parking spaces. 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

Development standards that may be acceptable in most cases may, under unique circumstances, constrain the development or improvement of housing for persons with disabilities. State and Federal law requires jurisdictions to accommodate requests from persons with disabilities to waive specific requirements or standards of the Zoning Ordinance to ensure that their homes are

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<sup>10</sup> 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.

accessible 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 Zoning Ordinance allows flexibility or waivers to regulations, provide they do not require a fundamental alteration in the nature of the city's land use and zoning and building regulations, policies, practices, procedures, and the City's certified Local Coastal Program. For purposes of reasonable accommodation, the City defines disability as "a physical or mental impairment that limits one or more major life activities." Request for reasonable accommodation are reviewed and decided on by the Community Development Director based on information provided by the applicant, and subject to the following criteria:

- Whether the housing will be used by an individual with disabilities protected under fair housing laws;
- Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair housing laws;
- Whether the requested accommodation would impose an undue financial or administrative burden on the jurisdiction; and
- Whether the requested accommodation would require a fundamental alteration in the nature of the jurisdiction's land use and zoning or building program and the City's certified Local Coastal 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 tests.
- The public and common areas shall be readily accessible to and usable by persons with disabilities.
- All the doors designed to allow passage into and within all premises shall be sufficiently wide to allow passage by persons in wheelchairs.
- All premises within covered multifamily dwelling units shall contain the following features of adaptable design:
  - An accessible route into and through the covered dwelling unit.
  - Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations.
  - Reinforcements in bathroom walls to allow later installation of grab bars around the toilet, tub, shower stall, and shower seat, where those facilities are provided.
  - Useable kitchens and bathrooms so that an individual in a wheelchair can maneuver about the space.

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 Publicly 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 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-38. 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 low when compared to these neighboring jurisdictions (see Table H-39).

<b>Review/Permit</b>	<b>Deposit</b>
CEQA	
Initial Assessment	\$1,000
Negative Declaration	\$2,000
Environmental Impact Report	\$7,000
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, 2020.</i>	

<b>Fee Type</b>	<b>Imperial Beach</b>	<b>National City</b>	<b>Chula Vista</b>	<b>San Diego</b>
Coastal Development Permit				
--Administrative	\$1,500	\$750	\$5,000	\$8,000
--Regular	\$2,000	\$3,350	\$11,000	
Conditional Use Permit	\$2,000	\$3,700	\$11,000	\$8,000
Variance	\$1,800	\$3,700	\$9,000	\$8,000
Rezone	\$3,000	\$5,500	\$10,000	\$12,000
General Plan Amendment	\$5,000	\$5,500	\$20,000	\$12,000
Tentative Parcel Map	\$2,500	\$3,000	\$12,500	\$10,000
Tentative Tract Map	\$3,000	\$4,000	\$10,000	\$10,000
<i>Sources: City of Imperial Beach, 2020; City of National City, 2020; Chula Vista, 2020; and City of San Diego, 2020.</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. As shown in Table H-40, overall permit and impact fees in Imperial Beach are among the lowest in the County.

Jurisdictions	Per Unit Permit and Impact Fees			
	Single Family	Townhome (Type V Construction)	Condominium (Type III Construction)	Apartment (Type V Construction)
Carlsbad	\$42,616.78	\$23,012.02	\$17,086.21	\$16,762.04
Chula Vista	\$57,167.97	\$42,481.32	\$38,577.18	\$38,596.86
Encinitas	\$22,932.15	\$15,984.48	---	\$15,233.65
Escondido	\$37,044.15	\$31,185.86	\$29,360.35	\$29,360.35
<b>Imperial Beach</b>	<b>\$15,161.22</b>	<b>\$11,262.71</b>	<b>\$9,832.14</b>	<b>\$21,010.37</b>
La Mesa	\$27,442.49	\$19,242.63	\$14,248.72	\$12,906.75
Lemon Grove	\$13,563.65	\$6,259.63	\$4,870.52	\$5,106.55
National City	\$15,025.99	\$5,655.93	\$4,175.54	\$4,175.54
Oceanside	\$68,235.30	\$25,089.74	\$17,254.33	\$17,178.01
Poway	\$26,528.05	\$21,194.22	\$2,059.13	\$20,898.17
San Diego	\$155,367.00	\$103,121.73	\$95,731.81	\$97,461.70
San Marcos	\$30,761.34	\$25,588.10	\$23,410.80	\$14,184.14
Santee	\$31,313.31	\$3,508.303	\$707.96	\$1,892.94
San Diego County	\$21,797.00	\$12,793.00	\$10,900.00	\$11,156.00
Vista	\$27,546.37	\$20,804.79	\$23,176.90	\$18,608.86

*Source: BIA 2019-2020 Fees Study for San Diego County*

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 emergency /transitional housing, and housing for persons with disabilities, to make the development of such units more financially feasible. Fee waivers are determined in a case-by-case basis, depending on the specific project's financial pro forma and gap financing needed, and the number of affordable housing units the City can get in exchange of assistance. For affordable housing projects, the City works closely with the project proponents to determine the gaps and the potential City contribution.

### **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, undergrounding utilities, 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 has an approved Local Coastal Plan and is currently working on an amendment with the Coastal Commission. The 2019 update of the General Plan/ Local Coastal Plan is a focused policy update that incorporates components of the plan that was adopted by the City in 1994.

The City Council of Imperial Beach also acts as the Planning Commission, allowing more efficient processing of development reviews. Table H-41 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.

<b>Table H-41: Typical Permit Processing Timelines</b>		
<u>Action/Request</u>	<u>Processing Time</u>	<u>Comments</u>
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	1 year	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 Community Development Department
Site Plan Review	2-5 months	Approved by the Community Development Department or the City Council depending on the nature of the project
Design Review	2-5 months	Approved by the Community Development Department or the Design Review Board depending on the nature of the project.
Coastal Permit	2-5 months	Approved by the Community Development Department or the City Council and then reported to the Coastal Commission.
Tentative Map	2-5 months	Approved by the Planning Commission/City Council.
Variance	2-3 months	Approved by the Planning Commission/City Council.
Conditional Use Permits	2-5 months	Approved by the Planning Commission/City Council.
<i>Source: City of Imperial Beach, 2020.</i>		

### ***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. The City provides extensive consultation with developers prior to the Board Review in order to facilitate the review. Design Review for typical projects takes two-five months. 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 residential projects proposed in the R-3000, R-3000-D, 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 at a public hearing by the Planning Commission (City Council).

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 (mostly related to coastal access as required by law) 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.<sup>11</sup> 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.

### ***Conditional Use Permit***

The City requires a Conditional Use Permit (CUP) for various types of residential development applications, including Mobile Home Parks, Boarding Houses, Residential Care Facilities (in C/MU districts), Senior Housing Developments, and Single-Room Occupancies. 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 two to five months, 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:

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<sup>11</sup> Building permits for improvements to most single-family residences are exempt.

- 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.

### ***Transparency in Development Process***

To increase transparency and certainty in the development application process as required by law, the City has a variety of tools available for developers. The City's Community Development Department home page has links to the City's online permitting portal/fee estimator (PSS Portal) and zoning map ([https://www.imperialbeachca.gov/community\\_development](https://www.imperialbeachca.gov/community_development)). Direct links are also provided below:

- Zoning Code/Development Standards: <http://qcode.us/codes/imperialbeach/>
- Zoning Map: [http://gis.imperialbeachca.gov/media/maps/community\\_development/IB\\_Zoning\\_11x17\\_Landscape.pdf](http://gis.imperialbeachca.gov/media/maps/community_development/IB_Zoning_11x17_Landscape.pdf)
- Master Fee Schedule (Development Fees): [https://www.imperialbeachca.gov/administrative\\_services](https://www.imperialbeachca.gov/administrative_services)
- Fee Estimator/Permit Application Portal: <https://imperialbeachca-energovpub.tylerhost.net/Apps/SelfService#/home>

### ***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 2019 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 adopted minor amendments to the CBC. Amendments can be found here: [https://qcode.us/codes/imperialbeach/view.php?topic=15-15\\_06-15\\_06\\_020&frames=on](https://qcode.us/codes/imperialbeach/view.php?topic=15-15_06-15_06_020&frames=on). The minor amendments are related to swimming pool safety, patio

covers, and access for firefighters, etc. The Code Compliance Division which is a section of the Community Development Department enforces applicable building codes. Code enforcement is reactive and prioritizes based on safety and blight. However, code enforcement remains complaint-based and will investigate complaints to determine appropriate steps.

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. However, state law does allow a number of exceptions for single-family homes and for projects intended to support affordable housing, such as the construction or expansion of emergency shelters or construction of some types of affordable housing units.

#### **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 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 2015 Urban Water Management Plan (UWMP), in 2015 the company delivered 9,298 acre feet of water to the service area (which includes Imperial Beach). The projected service demand is expected to increase to 11,971 acre feet by 2020 and to 13,111 acre feet by 2035. 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, and up to 120 percent of the average system delivery per customer per day. Historically, California American Water has been able to meet 100 percent of its demand through purchased water from the City of San Diego, and the UMWP assumes that this will continue to be the case through 2020. The UWMP anticipates adequate water supply to meet projected future demand through 2035 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 63 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.

In 2016, the City of Imperial Beach completed a Sea Level Rise Vulnerability Assessment which identified the impacts that the City currently experiences related to hazards such as tidal inundation and flooding. The study identified that without the incorporation of adaptation measures, the City would begin to experience more severe hazard related impacts associated with Sea Level Rise. In response, the City initiated an update to its Local Coastal Program (LCP), which includes adaptation policies intended to protect residents from environmental hazards and

conserve land while promoting economic and housing development, as such, the LCP is not considered a constraint to housing in Imperial Beach.

### **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 for the 6<sup>th</sup> cycle Housing Element update. 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 the growth projection and planning period from June 30, 2020 through April 15, 2029. 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 1,329 new units between June 30, 2020 and April 15, 2029. This allocation is distributed into four income categories, as shown below in Table H-42. 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.

<b>Income Category (% of County AMI)</b>	<b>Number of Units</b>	<b>Percent</b>
Extremely Low (30% or less)*	113	8.5%
Very Low (31 to 50%)	112	8.4%
Low (51 to 80%)	123	9.3%
Moderate (81% to 120%)	183	13.8%
Above Moderate (Over 120%)	798	60.0%
<b>Total</b>	<b>1,329</b>	<b>100.0%</b>

Source: Final Regional Housing Needs Allocation, SANDAG, August 2020.

AMI = Area Median Income

Note: \* The City has a RHNA allocation of 225 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 (Table H-10), 18.5 percent of the City households were extremely low income and 18 percent were very low income. Therefore, the 225 very low income households are split evenly.

#### 4.1.2 Credits toward the RHNA

The 6<sup>th</sup> cycle RHNA covers a planning period that is almost nine years, starting on June 30, 2020. Housing units built, under construction, or approved June 30, 2020 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-43).

##### ***Units Approved***

As of July 1, 2020, the City entitled a total of 77 housing units, including Accessory Dwelling Units (ADUs), duplex units, condominiums, and single-family homes. Only the duplex and ADUs are considered affordable to moderate income households as previously shown in Table H-29 and Table H-30, where moderate income households can generally afford apartment rentals in the City.

##### ***Units Pending Approval***

As of July 1, 2020, a total of 24 units were at various stages of review and approval. Only the duplex and apartment units are considered affordable to moderate income households based on rent levels in the City. The remaining are presumed to be affordable only to above moderate income households.

##### ***Remaining Housing Need to be Accommodated***

After accounting for units approved and pending approval, a remaining need of 1,218 units exists. 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 April 15, 2029.

	Unit Type	Very Low	Low	Moderate	Above Moderate	Total
<b>RHNA</b>		<b>225</b>	<b>123</b>	<b>183</b>	<b>798</b>	<b>1,329</b>
<b>Net Units Entitled (Not Permitted) as of 7/1/2020</b>						
829 Emory St.	ADU	---	---	1	---	1
236-238 Palm Ave.	Mixed Use	---	---	---	12	12
552 4th Street	SF	---	---	---	1	1
415 Delaware Street	Condo	---	---	---	2	2
575 8th Street	SF	---	---	---	2	2
571 11th Street	Condo	---	---	---	3	3
119-121 Date Ave	Duplex	---	---	1	---	1
550 Highway 75	Mixed Use Condo	---	---	---	51	51
821-825 10th St	SF and ADU	---	---	1	---	1
183-185 Evergreen Ave	SF	---	---	---	1	1
189 Elm Avenue	Condo	---	---	---	2	2
<b>Subtotal:</b>		<b>0</b>	<b>0</b>	<b>3</b>	<b>74</b>	<b>77</b>

Table H-43: Credits Toward RHNA						
	Unit Type	Very Low	Low	Moderate	Above Moderate	Total
<b>Net Units Pending Approval as of 7/1/2020</b>						
670 Ocean Lane	SF	---	---	---	1	1
626-381-16-00	SF	---	---	---	1	1
495 Palm Ave	MF	---	---	9	---	9
1166-1174 Seacoast Drive	Condo	---	---	---	4	4
464-482 7th St.	Condo	---	---	---	5	5
1085 Palm Avenue	Condo	---	---	---	6	6
276 Elm Avenue	SF	---	---	---	1	1
843 Georgia St.	Condo	---	---	---	1	1
130 Daisy Ave.	Condo	---	---	---	2	2
284 Elder Ave.	Condo	---	---	---	1	1
374 Imperial Beach Blvd	Duplex	---	---	1	---	1
916 10th Street	Condo	---	---	---	2	2
<b>Subtotal:</b>		<b>0</b>	<b>0</b>	<b>10</b>	<b>24</b>	<b>34</b>
<b>Remaining RHNA</b>		<b>225</b>	<b>123</b>	<b>170</b>	<b>700</b>	<b>1,218</b>

### 4.1.3 Anticipated Accessory Dwelling Units (ADUs)

New State laws passed since 2017 have substantially relaxed the development standards and procedures for the construction of Accessory Dwelling Units (ADUs). As a result, the City has seen significant increases in ADUs in the community, increasing from just a few units annually in 2017 and 2018, to 12 units in 2019, and by October 2020, 22 units have already been permitted during the first 10 months of the year. Based on this steeply upward trend, the City anticipates permitting at least 25 ADUs in 2020. The City is in the process of updating its Accessory Dwelling Unit (ADU) Ordinance. This Housing Element also includes a program to facilitate the development ADUs.

For the purpose of RHNA credits, the City assumes 25 ADUs annually for a total of 200 ADUs over the eight-year planning period of the Housing Element. Given the housing affordability analysis contained in the Community Profile, the City expects that all new ADUs to be affordable to moderate income households.

### 4.1.4 Residential Sites Inventory

As part of this Housing Element update, the City identified residential sites that could accommodate Imperial Beach's future housing needs.

#### ***Pipeline Projects***

The City of Imperial Beach owns a 0.29-acre site zoned for High Density Residential (R-1500). The City plans to solicit affordable housing development proposals on this site and anticipates accommodating between 10 and 35 affordable units on site. Another property of 1.51 acres is currently zoned Single-Family Residential (R-1-6000) and High Density Residential (R-1500). However, the property owner has contacted the City with a plan to construct a 68-unit supportive housing. These two projects can potentially increase the City's affordable housing inventory by

78 to 103 units. These two projects are not included in the Residential Recycling or Mixed Use sites discussed below. See Figure C-1 for the location of the pipeline projects, residential recycling sites, and mixed use sites.

### ***Residential Recycling***

The City has nearly 400 acres of land zoned R-3000, R-3000-D, R-2000, and R-1500. In the five-year period between 2015 and 2020, over 80 properties have been developed into higher intensity uses, primarily from single-family units and mobile home lots to duplex/triplex units, and small apartment and condominium complexes, and also including the redevelopment of an RV park. Redevelopment of these medium-high density residential properties has created 334 housing units, yielding a net increase of 286 housing. The City anticipates this recycling trend to continue.

To identify additional residentially zoned parcels with potential for new development or recycling opportunities, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
  - Land value is greater than improvement value
  - Structure was built prior to 1990 (and therefore over 30 years of age)
  - Existing uses are not condominiums or apartments
  - Redevelopment can at least double the number of units existing on site
  - Parcel has similar characteristics (such as types of units and potential yield) as parcels where projects have been recently developed

A total of 303 parcels meet these criteria, including a few vacant residential parcels. The majority of the parcels are zoned R-2000, R-3000, and R-3000-D. Parcels that cannot yield projects that are similar to recent recycling trends have been removed from this residential recycling inventory. These parcels can potentially yield 710 gross units, assuming development at 80 percent of the allowable densities. These parcels, without considering potential for lot consolidation, can yield 412 net units. Most of the parcels are small and even with lot consolidation, would not form development sites of 0.5 acre or larger. Therefore, while the majority of the sites are zoned for higher density development, they are assumed to be feasible for facilitating moderate income housing.

### ***Development in Mixed Use Districts***

The City's residential neighborhoods are primarily built out. Future residential development will rely on underutilized commercial properties where residential uses are permitted, as in the City's C/MU-1, C/MU-2, C/MU-3, and SMU/RO areas.



To initially identify vacant and underutilized commercial properties for potential residential or mixed use development, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
  - Land value is greater than improvement value
  - Structure was built prior to 1990 (and therefore over 30 years of age)
  - Parcel has similar conditions and characteristics as parcels where projects have been developed in recent years
- Parcel is at least 0.5 acre or has the potential for consolidation with adjacent parcels for a total size of at least 0.5 acre

The resultant parcels were reviewed other additional criteria:

- General characteristics such as declining uses, low existing Floor Area Ratio (FAR), and COVID-impacted uses, among others
- Location near recent mixed use or residential development activities on properties exhibiting similar characteristics.
- Expressed interests from property owners or developers
- Potential for lot consolidation

The City has identified 172 parcels (39.8 acres) zoned for and commercial/mixed use that are underutilized and ripe for redevelopment. 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. Furthermore, the current COVID-19 pandemic has seriously impacted the viability of many retail, service, and restaurant businesses. In most cases, redevelopment of these sites in recently years almost always are mixed use or residential-only projects.

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. 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. Appendix C includes a detailed listing of the parcels identified and photo documentation of existing conditions.

### ***Realistic Capacity Assumptions***

Over the past five years, the City has seen increasing interest in mixed use development. The C/MU-2, C/MU-3, and SMU/RO districts have a base density of 29 units per acre but can reach 36 units per acre with the approval of a CUP. As shown in Table H-44, with the exception of one project, all mixed use projects in the C/MU-2, C/MU-3 and SMU/RO zones applied for and were approved for the increased density. Average development density exceeds base density due to inclusion of affordable units. Projects eligible for 36 units per acre averaged at 87 percent or 31 units per acre. Therefore, for the purpose of estimating development potential in C/MU-2, C/MU-3, and SMU/RO zones, the base density of 29 units per acre is used. For C/MU-1 where the density can reach 43 units per acre, a conservative 34 units per acre (80 percent) is used.

While it is possible for projects to be 100 percent commercial in the City’s mixed-use districts, only 23 percent of the projects over the past few years have been 100 percent commercial. The remaining 77 percent of projects have included housing, including 46 percent that have been stand-alone residential, accounting for 217 of the residential units built in the last planning period. Furthermore, with the declining trend of retail and potential impacts of COVID-19 on office use, the prospect of 100 percent commercial projects is not likely to increase in the near future. The estimate of potential residential capacity is based on densities that are below the demonstrated trends. Therefore this sites inventory includes a healthy buffer to accommodate the potential loss of residential capacity due to commercial development.

For residential development in the R-1500 and R-3000 zones, the average density yield for the most recent project is 95 percent. Conservatively, residential recycling is estimated at 80 percent of the allowable density.

Address	Zoning	Project	# Units (Entitled, Constructed, or Proposed)	# Units Allowed		% of Units Allowed	
				Base Density	CUP Density	Base Density	CUP Density
951 Seacoast Drive	C/MU-2	Commercial/ Residential	3	3	3	100%	100%
110 Evergreen Avenue	C/MU-2	Commercial/ Residential	11	9	11	122%	100%
550 Highway 75	C/MU-1	Hotel/ Condo	51	56	---	91%	---
801 Seacoast Drive	C/MU-2	Commercial/ Residential	6	9	11	67%	55%
744 Emory Street	C/MU-1	Commercial/ Residential	11	11	---	100%	---
236-238 Palm Ave.	C/MU-2	Commercial/ Residential	14	11	14	127%	100%
409 Palm Ave	R-1500	Multi-Family	23	26	---	88%	---
	R-3000		51	52	---	98%	---
Average:						96%	87%

*Source: City of Imperial Beach, 2020*

**Affordability Assumptions**

The realistic capacity of the City’s vacant and underutilized sites plus anticipated ADUs could result in 2,076 new dwelling units between 2021 and 2029. In addition, pipeline projects can potentially add 78 to 103 units to the City’s affordable housing inventory. The following discussion demonstrates that the City has adequate capacity to accommodate the RHNA by income category:

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. The City’s three C/MU-2, C/MN-2 and SMU/RO zones with base density of 29 units per acre and CUP density of 36 units per acre, along with C/MU-1 at 43 units per acre, can accommodate an estimated 804 lower income units. However, sites that do not meet the 0.5 acre size threshold or cannot accommodate at least 16 net units would be allocated to the moderate income category, yielding about 352 units.

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 R-3000, R-3000-D, R-2000, and R-1500 zones can accommodate 396 moderate income units. The R-1-6000 and R-1-3800 sites can facilitate 16 above moderate income units.

### **Summary of Sites Capacity**

Table H-45 includes a summary of the detailed inventory of vacant and underutilized sites contained in Appendix C. Each identified site is adjacent to developed land and can be readily served with existing infrastructure.

<b>Table H-45: Vacant and Underutilized Sites Summary</b>					
<b>Zoning</b>	<b>Parcel Count</b>	<b>Total Acres</b>	<b>Max Density</b>	<b>Realistic Capacity (Net Units)</b>	<b>Affordability</b>
<b>Vacant</b>					
R-1-6000	2	0.26	7 du/a	2	Above
R-3000-D	2	0.35	14 du/a	4	Moderate
R-2000	5	0.95	21 du/a	16	Moderate
R-1500	2	0.18	29 du/a	5	Moderate
<b>Nonvacant</b>					
R-1-6000	3	1.57	7 du/a	6	Above
R-1-3800	8	1.63	11 du/a	9	Above
R-3000 & R-3000-D	147	16.16	14 du/a	195	Moderate
R-2000	124	28.62	21 du/a	151	Moderate
R-1500	10	1.65	29 du/a	24	Moderate
SMU/RO	15	1.57	29-36 du/a	34	Moderate
C/MU-3	9	1.72	29-36 du/a	46	Lower
C/MU-3	7	1.23	29-36 du/a	29	Moderate
C/MU-2	13	1.89	29-36 du/a	48	Lower
C/MU-2	24	3.49	29-36 du/a	79	Moderate
C/MU-1	69	22.69	43 du/a	710	Lower
C/MU-1	35	7.28	43 du/a	210	Moderate
<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.					

### **Public Services and Infrastructure Availability**

As discussed in detail 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 1,329 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.

### 4.1.5 Summary

Table H-46 summarizes the City’s accommodation of the RHNA for all income groups during the 2021-2029 planning period. After accounting for development credits, anticipated ADUs, and realistic capacity of vacant and underutilized sites, the City has identified surplus capacity of 551 to 576 units in the lower and moderate income units.

Income	RHNA	Entitled/ Pending	Anticipated ADUs	Residenti al Sites	Mixed Use Sites	Pipeline Projects	Surplus/ Shortage
Very Low (<50% AMI)	225	0	0	0	804	78-103	534-559
Low (51-80% AMI)	123	0	0	0			
Moderate (81%-120% AMI)	183	10	200	395	352	0	774
Above Moderate (>120% AMI)	798	24	0	17	0	0	-757
<b>Total</b>	1329	34	200	412	1,156	78-103	551-576

## 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.

### 4.2.1 SB2/LEAP Grants

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State’s housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. The City of Imperial Beach received \$160,000 for planning efforts to facilitate housing production. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG). HCD is in the process of closing out the Year One planning grant allocations and has not begun the process of allocating the Year Two affordable housing funds. However, as a non-entitlement jurisdiction participating in the CDBG program under the Urban County program, the City of Imperial Beach would not be directly eligible to apply for funding under the Permanent Local Housing Allocation (PLHA) component of SB 2. Instead, the City would receive funding through the County of San Diego, similar to the CDBG program. SB2 PLHA funds can be used to:

- Increase the supply of housing for households at or below 60 percent of AMI
- Increase assistance to affordable owner-occupied workforce housing
- Assist persons experiencing or at risk of homelessness
- Facilitate housing affordability, particularly for lower and moderate income households
- Promote projects and programs to meet the local government’s unmet share of regional housing needs allocation

Another source of funding to help local jurisdictions to update their planning documents and implement process improvements that will facilitate housing construction is the Local Early Action Planning (LEAP) grants. The City received \$150,000 in LEAP grants in 2020. However, this is a one-time-only program.

#### **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
- Down payment 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
- 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.<sup>12</sup> 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.

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<sup>12</sup> 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 a participating jurisdiction, Imperial Beach residents are eligible to receive assistance through the following programs:

- Home Repair Loan/Grant Program
- Down payment and Closing Cost Program
- Housing Choice Vouchers

### **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 are some of the active affordable housing developers and supportive housing service providers in San Diego County:

- Alpha Project
- Bridge Housing Corporation
- Casa Familiar
- Catholic Charities
- Community Housing Works
- County of San Diego Housing and Community Development Department
- Episcopal Community Services
- Habitat for Humanity
- Jamboree Housing
- Lutheran Social Services
- MAAC Project
- National CORE
- San Diego Community Land Trust
- San Diego Interfaith Housing Federation
- Wakeland Housing and Development Corporation

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). LIHEAP provides financial assistance to lower income households to offset the costs of heating and/or cooling their residences.

### **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.

#### **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 Savings Assistance Program:** With SDG&E's Energy Savings Assistance program, a homeowner may be eligible to receive low- or no-cost products and installation: attic insulation; energy-efficient lighting; door weather-stripping; replacement of qualified appliances; caulking; minor home repairs; low-flow showerheads; and water heater blankets.

# Section 5: Housing Plan

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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 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.

### 5.1.1 Range of Housing Types

Continuing to provide a balanced inventory of housing in terms of types (e.g., single-family, accessory dwelling units, 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, household type, or income.

**Goal 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 households, single parents, persons with disabilities, and the homeless.
- Policy 1.4:** Maintain streamlined procedures for processing new residential and mixed use 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.

**5.1.2 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 with information on available development incentives.
- Policy 2.2:** Promote mixed-use development and accessory dwelling units (ADUs) 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 to enhance the feasibility of infill development.

### **5.1.3 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 County and State programs that assist qualified buyers with the purchase of a home.

**Policy 3.3:** Promote homeownership 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.

### **5.1.4 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 86 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.

### **5.1.5 Affirmatively Furthering Fair Housing**

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. The City's AFFH Assessment found a need for increased fair housing enforcement and outreach, increased housing options for the elderly and large households, and disproportionate housing problems for non-White households, and need to update the zoning code to facilitate housing.

#### **GOAL 5: Ensure that all residents have equal housing opportunities, regardless of their special characteristics as protected under State and Federal fair housing laws.**

- Policy 5.1:** Affirmatively further fair housing and promote equal housing opportunities for persons of all socioeconomic 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 increased outreach and education for the broader community of residents, residential property owners and operators regarding fair

housing practices and requirements, especially through non-traditional media.

**Policy 5.6:** Promote increased enforcement of fair housing laws.

## 5.2 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 (2021-2029) 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

As a small city, Imperial Beach has limited resources for implementing housing programs and participates in several State and Federal programs through the County of San Diego Housing & Community Development Services (County HCDS).

### 5.2.1 Housing Conservation and Improvement

Conserving and improving the housing stock is an important goal for the City of Imperial Beach. Approximately 86 percent of housing units in Imperial Beach were constructed prior to 1990 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: Housing Repair Loans and Grants Program

The City estimates that approximately 710 homes are in substandard conditions. Lower income residents of Imperial Beach are eligible to receive loans and grants provided by the County of San Diego, Department of Housing & Community Development Services, 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 \$12,000 for mobilehomes are available to eligible homeowners.

- Responsible Agencies:**
- County HCDS
  - City of Imperial Beach Community Development Department
  - City of Imperial Beach Code Compliance Division
- Financing:**
- CDBG and HOME

**Actions and  
Timeframe:**

- Continue to promote the County’s Housing Repair Loans and Grants Program to property owners through dissemination of brochures at public counters, providing information on City website, and referring residents and property owners to the County for assistance.
- Continue to provide link to the County program at the City website: [https://www.imperialbeachca.gov/housing\\_programs](https://www.imperialbeachca.gov/housing_programs)
- Provide technical assistance and personal appointments to residents to help review their rehabilitation needs.
- Continue to prioritize code enforcement based on safety and blight.
- Support nonprofit organizations in pursuing funding for residential rehabilitation programs and projects.
- Ongoing implementation and annual monitoring and reporting throughout the planning period.

**Quantified  
Objectives**

- 20 lower income households

**Program 2: Neighborhood Improvements**

The City applies for and receives an annual allocation of CDBG funds from the County HCDS, 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 HCDS

**Financing:**

- CDBG

**Actions and  
Timeframe:**

- Annually apply to the San Diego Urban County for CDBG funds.

**Quantified Objectives**

- Complete eight infrastructure and public facility improvement projects that serve lower income neighborhoods by 2029.

**Program 3: Conservation of Existing and Future Affordable Units**

The City has an inventory of 157 publicly assisted housing units affordable to lower income households. These units are deed restricted for long-term affordability. Between April 15, 2021, and April 2029, no publicly assisted units are considered at risk of converting to market rate housing.

**Responsible  
Agencies:**

- City of Imperial Beach
- U.S. Department of Housing and Urban Development (HUD)
- County HCDS

**Financing:**

- HUD Section 8 Allocation; Housing Authority Special Housing Choice Vouchers; SB 2 Permanent Local Housing Allocation

- Actions and Timeframe:**
  - *Monitoring:* Ongoing monitoring of the status of publicly assisted units.
  - *Tenant Education:* Educate tenants on fair housing laws, including the most recent source of income protection (SB 329). (See also Program 6)
- Quantified Objectives**
  - Monitor and preserve the affordability of all 157 publicly assisted housing units.

**Program 4: Coastal Zone Monitoring**

All housing in Imperial Beach is located within or near the Coastal Zone. 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
- Actions and Timeframe:**
  - Ongoing tracking of new construction, demolition, and conversion of affordable units within the Coastal Zone.
- Quantified Objectives**
  - Not applicable

**5.2.2 Housing Assistance**

The City seeks to assist the real estate market provide decent housing and a suitable living environment for all Imperial Beach residents. The following programs provide assistance to developers of new affordable housing development or expand housing choices for income-qualified residents of Imperial Beach.

**Program 5: Affordable Housing Incentives**

To encourage and facilitate affordable housing development in Imperial Beach, including housing for extremely low income and very low income households, and households with special needs (such as persons with disabilities and farmworkers), 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; and
- 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.

**Responsible Agencies:** • City of Imperial Beach Community Development Department

**Financing:** • None required

**Actions and Timeframe:**

- Outreach to non-profit organizations and affordable housing developers annually to explore opportunities for affordable housing. Outreach should include developers and non-profit organizations with experience in development projects that include units affordable to extremely low income households and households with special needs.
- Continue to provide regulatory and technical assistance to affordable housing developers and non-profit organizations.
- Annually explore various sources (e.g., HCD and HUD) for funding opportunities, including those available for housing for extremely low income households. Specifically, work with the County Housing & Community Development Services to pursue SB 2 Permanent Local Housing Allocation for affordable housing activities.
- 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.

**Quantified Objectives** Expand affordable housing inventory by 50 units over eight years (10 extremely low; 20 very low; 20 low income units).

## Program 6: Housing Choice Vouchers

The County of San Diego, Department of Housing & Community Development Services administers the Housing Choice Voucher (HCV) program on behalf of the City of Imperial Beach. The Housing Choice Voucher program extends rental subsidies to very low income households (50 percent AMI), 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 HCDS  
 • City of Imperial Beach Community Development Department

**Financing:** • HUD Section 8 allocation

**Actions and  
Timeframe:**

- Continue to promote the HCV 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 HCDS.
- Work with County HCDS to promote acceptance of HCVs through outreach and education to renters, and rental property owners and managers. Specifically, California legislature passed SB 329, which redefines source of income as “lawful, verifiable income paid directly to a tenant or to a representative of a tenant, or paid to a housing owner or landlord on behalf of a tenant, including federal, state or local public assistance, and federal, state, or local housing subsidies, including, but not limited to, federal housing assistance vouchers issues under Section 8 of the United States Housing Act of 1937.” SB 222 passed in 2019 also extends the same protection to VASH (Veterans Affairs Supportive Housing) voucher recipients.

**Quantified Objectives**

- Promote the use of Housing Choice Vouchers with the goal of maintaining at least the current level of assistance (400 voucher holders) in Imperial Beach.

**Program 7: Homebuyer Assistance Programs**

As a small city, Imperial Beach does not have the financial resources to directly offer any homebuyer assistance programs. However, Imperial Beach residents are eligible to participate in several County and State programs, including the Down payment and Closing Cost Assistance (DCCA) program offered by the County HCDS, and California Mortgage Credit Certificates (MCC) and Homebuyer’s Down payment Assistance Program (CHDAP) offered by the State:

- **DCCA** offers low-interest deferred payment loans of up to 17 percent of the maximum allowable purchase price (adjusted annually) and a closing cost of four percent, not exceeding \$10,000. 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 HCDS
- 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 and information on City website.
  - Refer residents to the County HCDS and the California Housing Finance Agency for assistance.
- Quantified Objectives**
- County HCDS has a goal of assisting approximately 120 households with DCCA. This goal covers the entire Urban County program.

### 5.2.3 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 8: Residential Sites Inventory and Monitoring of No Net Loss

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 nonvacant 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 potential sites and will continue to provide sites information to interested developers.

To ensure that the City monitor its compliance with SB 166 (No Net Loss), the City will develop a procedure to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory.
- Actual units constructed and income/affordability when parcels are developed.
- Net change in capacity and summary of remaining capacity in meeting remaining Regional Housing Needs Allocation (RHNA).

**Responsible Agencies:**

- City of Imperial Beach Community Development Department

**Financing:**

- None required

**Actions and Timeframe:**

- Develop a procedure in 2021 to monitor the development of vacant and nonvacant sites in the sites inventory and ensure that adequate sites are available to meet the remaining RHNA by income category.

- Provide information on available sites and development incentives to interested developers and property owners on City website.

**Quantified Objectives:**

- Provide adequate sites to accommodate the City’s entire RHNA allocation of 1,329 units (225 very low income; 123 low income; 183 moderate income; and 798 above moderate income).

## **Program 9: By-Right Approval for Projects with 20 Percent Affordable Units**

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower income households, on sites being used to meet the 6th cycle RHNA that represent a “reuse” of sites previously identified in the 4th and 5th cycles Housing Element. The “reuse” sites are specifically identified in the inventory (see Appendix C).

- Responsible Agencies:** • City of Imperial Beach Community Development Department
- Financing:** • None required
- Actions and Timeframe:** • Amend Zoning Ordinance within one year of Housing Element adoption
- Quantified Objectives:** • Mixed use sites for the City’s lower income RHNA are primarily reuse sites and subject to this new provision.

### **5.2.4 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 10: Lot Consolidation Program**

As a primarily built out community, Imperial Beach will rely primarily the Mixed Use zoning (C/MU and SMU/RO) to facilitate the development of lower income housing. However, most vacant and nonvacant sites within the City are relatively small legal lots under half an acre in size. To facilitate lot consolidation, the City may consider incentives 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 subject to finding that adequate parking will be available to serve the subject project;
- **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; and/or
- **Signage Bonus:** Area of permitted signs within mixed use zones may be increased, subject to finding that the increased size of signs on one parcel will not adversely affect the visibility of signs on adjacent parcels.

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
- Actions and Timeframe:**
  - By the end of 2021, consider appropriate lot consolidation incentives to facilitate mixed use development.
  - Promote the program through dissemination of brochures at public counters and providing information on City website.
- Quantified Objectives:** • Not applicable

### **Program 11: Density Bonus Ordinance**

The State has recently passed several bills that change the State Density Bonus law. These include:

- AB 1763 (Density Bonus for 100 Percent Affordable Housing) – Density bonus and increased incentives for 100 percent affordable housing projects for lower income households.
- SB 1227 (Density Bonus for Student Housing) - Density bonus for student housing development for students enrolled at a full-time college, and to establish prioritization for students experiencing homelessness.
- AB 2345 (Increase Maximum Allowable Density) - Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.

- Responsible Agencies:** • City of Imperial Beach Community Development Department
- Financing:** • None required
- Actions 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.
- Quantified Objectives:** • Not applicable

### **Program 12: Accessory Dwelling Units (ADUs)**

Accessory Dwelling Unit (ADU) represents an important affordable housing option to lower and moderate income households. The State has passed multiple bills in recent years to remove constraints to the development ADUs (including AB 587, AB 671, AB 68, and SB 13, among others). The City is in the process of updating its ADU ordinance to comply with State law. As part of the outreach process for the ADU ordinance, the City will also explore the feasibility of tiny homes as an alternative affordable housing choice. In addition, the City will consider incentives and tools to facilitate ADU construction.

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

**Actions and  
Timeframe:**

- Revise the Zoning Ordinance to update the ADU ordinance by the end of 2021.
- Develop incentives and tools to facilitate ADU construction by April 2022. Incentives may include:
  - Fee waivers or reductions beyond State requirement;
  - Pre-approved site/floor plans; or
  - Website information on resources and technical assistance.
- Develop a monitoring program in 2022 to ensure City is on track to meeting the construction goals:
  - If by April 2025 the City is not meeting its ADU goal, review and revise polices and efforts to increase ADU construction as necessary.

**Quantified Objectives:**

- Facilitate the construction of 200 ADUs over eight years.

**Program 13: Housing for Homeless and Special Needs**

Recent changes to State law regarding housing for the homeless and persons with special needs also warrant amendments to the Zoning Ordinance. These include:

- Low Barrier Navigation Centers (AB 101): AB 101 requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions.
- Emergency and Transitional Housing (AB 139): Local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone. The City’s Zoning Ordinance does not include specific parking requirements for emergency shelters. Therefore, an amendment is not necessary but may be considered to ensure consistent implementation.
- Supportive Housing (AB 2162): AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in these zones. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop. Imperial Beach Zoning Ordinance defines transitional and supportive housing in accordance with State law, and allows them subject to the restrictions that apply to other residential dwellings of the same type in the same zone.
- Residential Care Facilities: Defines residential care facilities in the Zoning Ordinance and clarifies compliance with State law regarding facilities for six or fewer residents.

**Responsible  
Agencies:**

- City of Imperial Beach Community Development Department

**Financing:**

- None required

- Actions and Timeframe:**
  - Revise the Zoning Ordinance within one year of adoption of the Housing Element.
- Quantified Objectives:**
  - Not applicable

**Program 14: Development Standards**

The City periodically reviews its development standards to ensure they are not unduly constraining to residential development. Two aspects are identified by the State HCD requiring further study and consideration:

- Group Home for Seven or More Persons: The City currently does not permit group homes for seven or more persons in residential zones.
- Parking for Small Units: The City does not utilize a sliding scale based on unit size.

- Responsible Agencies:**
  - City of Imperial Beach Community Development Department
- Financing:**
  - None required
- Actions and Timeframe:**
  - Initiate a process in 2022 to review the provision for group homes for seven or more persons and parking requirements for smaller units.
  - If appropriate and feasible, amend the Zoning Ordinance to mitigate the potential constraints or to identify alternative mechanisms to mitigate constraints.

- Quantified Objectives:**
  - Mitigate constraints to housing development

**5.2.5 Affirmatively Furthering Fair Housing**

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

**Program 15: Fair Housing Program**

Appendix D summarizes the fair housing issues and concerns in Imperial Beach based on findings of the 2020 Regional Analysis of Impediments to Fair Housing and additional research conducted as part of this Housing Element update. Table H-47 presents a summary of the issues, contributing factors, and the City’s actions in addressing these issues. The City recently hired a Housing Programs Specialist, whose responsibilities include many of the actions outlined below. Relevant responsibilities of this new staff position are described in Appendix D.

<b>Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation</b>		
<b>AFH Identified Fair Housing Issue</b>	<b>Contributing Factors</b>	<b>City Actions</b>
Fair Housing Outreach and Enforcement  Housing Mobility	<ul style="list-style-type: none"> <li>▪ Insufficient and inaccessible outreach and enforcement:               <ul style="list-style-type: none"> <li>- Lack of a variety of inputs media (e.g., meetings, surveys, interviews)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ At least annually participate in the SDRAFFH meetings to coordinate regional responses to housing discrimination issues.</li> <li>▪ Expand access to community meetings by publishing fair housing information in non-traditional media (such as social media</li> </ul>

**Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation**

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
	<ul style="list-style-type: none"> <li>- Lack of marketing community meetings</li> <li>- Insufficient local public fair housing enforcement and testing</li> </ul>	<p>platforms - Facebook, Instagram, Twitter, and YouTube, among others).</p> <ul style="list-style-type: none"> <li>- City working in new agenda system to increase outreach and accessibility.</li> <li>- City Manager meets with community members routinely to discuss needs.</li> <li>▪ Housing Programs Specialist to help implement a multi-lingual outreach and education program on housing-related matters.               <ul style="list-style-type: none"> <li>- At least annually coordinate with Legal Aid Society of San Diego (LASSD) to expand outreach efforts in Imperial Beach with special attention to the northeastern and southeastern parts of the City.</li> <li>- Conduct two outreach events annually. Ensure outreach is multi-lingual, especially since northeastern and southeastern tracts have a high concentration of Hispanic population and other immigrant groups.</li> <li>- Expand outreach and education on new State source of income protection (SB 329 and SB 229, see Program 6).</li> </ul> </li> <li>▪ Annually work with the Housing Authority of the County of San Diego to conduct landlord outreach to expand the location of participating voucher properties so voucher use would not be concentrated in northeastern or southeastern parts of the City.</li> <li>▪ Work with the County HCDS and LASSD to conduct random testing at least once every five years in Imperial Beach. Specifically, with the release of the 2020 Census, determine the appropriate bases be tested in the region and in the City.</li> </ul>
<p>New Housing Choices in Areas of High Opportunity</p> <p>Place-Based Strategies to Encourage Community Revitalization</p>	<ul style="list-style-type: none"> <li>▪ Concentration of minorities and LMI households and special needs groups:               <ul style="list-style-type: none"> <li>- Lack of private investments</li> <li>- Locating and type of affordable housing</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Encourage mixed income strategy in housing development by:               <ul style="list-style-type: none"> <li>▪ Promoting development of affordable housing across City (through mixed-use and infill opportunities) and near services (transit corridors).</li> <li>▪ At mixed use development proposals/pipeline projects are identified, Housing Programs</li> </ul> </li> </ul>

**Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation**

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
	<ul style="list-style-type: none"> <li>- Inaccessible sidewalks, pedestrian crossings, or other infrastructure</li> </ul>	<p>Specialist will outreach to developers to promote the City's mixed-use density bonus incentives for community benefits, specifically targeting housing with more than three bedrooms suitable for families and large households (See Table H-35).</p> <ul style="list-style-type: none"> <li>▪ By 2022, Housing Programs Specialist to develop an Affirmative Marketing Plan (AMP) that emphasizes marketing to the minority and low income concentration areas. Projects with affordable units (such as density bonus) will be required to implement the AMP.</li> <li>▪ Continue to invest in public facility and infrastructure projects that improve the quality of life for residents, especially in the northeastern and southeastern parts of the City (Program 2- Neighborhood Improvements).</li> <li>▪ Annually, utilize a place-based approach to invest CDBG funds for public improvements in areas with concentrated low and moderate income population (see Program 2: Neighborhood Improvements), with the goal of one improvement project in low/moderate income areas each year.</li> <li>▪ In 2022, ensure compliance with state law to facilitate affordable housing (ADUs), and Housing for Homeless and Special Needs (See Program 13).</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Substandard housing conditions:                             <ul style="list-style-type: none"> <li>- Age of housing stock</li> <li>- Cost of repairs or rehabilitation</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ On an ongoing basis, promote the housing rehabilitation programs available through the County HCDS (see Program 1). Specifically, the Housing Programs Specialist will increase outreach efforts in southeast and northeast areas of the City to publicize availability of assistance.</li> <li>▪ Support nonprofits in pursuing funding for acquisition/rehabilitation of housing through the County's HOME program.</li> </ul>
Protecting Existing Residents from Displacement	<ul style="list-style-type: none"> <li>▪ Displacement risk of low income residents due to economic pressure:                             <ul style="list-style-type: none"> <li>- Unaffordable rents</li> <li>- Concentration of poverty in some census tracts</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Target resources to displacement risk areas (northeastern and southeastern areas) and consider the community needs in outreach activities (language, meeting days/times, advertisement).</li> <li>▪ Outreach to be part of Housing Programs Specialist tasks and will be provided in multiple languages, including Spanish.</li> </ul>

Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation		
AFH Identified Fair Housing Issue	Contributing Factors	City Actions
	<ul style="list-style-type: none"> <li>- Availability of affordable housing</li> </ul>	<p>Specifically, conduct weekly office hours to assist residents with housing programs.</p> <ul style="list-style-type: none"> <li>▪ The City will provide annual training on fair housing laws at public meetings with the intention of hosting additional meetings.</li> <li>▪ Work with developers to support subsidized housing development where feasible.</li> <li>▪ By 2022, develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities.</li> <li>▪ For any meetings with developers the City will promote development of affordable housing.</li> <li>▪ Promote development of affordable housing across City (mixed-use and infill) and near services (transit corridors)</li> <li>▪ Improve housing mobility for HCV recipients by expanding knowledge of source of income protections (see Program 6)</li> </ul>

- Responsible Agencies:**
  - County HCDS
  - Legal Aid Society San Diego
  - City of Imperial Beach Community Development Department
- Financing:**
  - Urban County CDBG allocation
- Actions and Timeframe:** See Table H-47 above
- Quantified Objectives:**
  - Assist 400 residents with fair housing issues and concerns over eight years.

### 5.3 Quantified Objectives

The City of Imperial Beach has established the following quantified objectives for the 2021-2029 Housing Element:

Table H-48: Quantified Housing Objectives (2021-2029)						
Income Group	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA		225	123	183	798	1,329
New Construction	10	20	20	50	200	300
Rehabilitation (Housing Repair Loans and Grants)	5	5	10	---	---	20
Housing Assistance (Housing Choice Voucher)	202	202	---	---	---	404
Housing Conservation (At-Risk Housing)	93	93	---	---	---	186

# Appendix A: Community Outreach

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## A.1 Outreach List

Laura Nunn, Director of Policy and Programs  
San Diego Housing Federation  
3939 Iowa Street, Suite 1  
San Diego, CA 92104

Abigail Rex for Imperial Beach Gardens  
American Assets Trust, Inc  
11455 El Camino Real # 200  
San Diego, CA 92130-2047

San Diego County Apartments Association  
8788 Balboa Avenue, Suite B  
San Diego, CA 92123

San Diego County Housing and Community  
Development Department  
3989 Ruffin Road  
San Diego, CA 92123

Karen Begin, Director of Development  
San Diego Habitat for Humanity  
8128 Mercury Court  
San Diego, CA 92111

Lutheran Social Services – San Diego  
3101 Fourth Avenue  
San Diego, CA 92103

Michael Pavco, Senior Vice President, Real  
Estate Department  
City of San Diego Housing Commission  
1122 Broadway, Suite 300  
San Diego, CA 92101

San Diego Community Land Trust  
Tom Scott, Interim Executive Director  
PO Box 263  
Lemon Grove, CA 91946

Kelly Salmons, Program Coordinator  
County of San Diego HCD  
3989 Ruffin Rd.  
San Diego, CA 92123

Hitzke Development Corporation  
251 Autumn Drive, Suite 100  
San Marcos, CA 92069

Chelsea Investment Corporation  
6339 Paseo Del Lago  
Carlsbad, CA 92011

San Diego Regional Center  
South County Center  
2727 Hoover Avenue, Ste. 100  
National City, CA 91950

South Bay Community Services  
430 F Street  
Chula Vista, CA 91910

Sue Reynolds, President & CEO  
Community Housing Works  
3111 Camino del Rio North, Suite 800  
San Diego, CA 92108

Creative Support Alternatives  
3590 Camino del Rio North, Suite 121  
San Diego, CA 92108

Lisa Cuestas, Chief Executive Officer  
Casa Familiar  
119 W. Hall Avenue  
San Ysidro, CA 92173

Francis X. Riley, Field Office Director  
U.S. Department of H.U.D.  
San Diego Field Office  
Symphony Towers  
750 B Street, Suite 1600  
San Diego, CA 92101-8131

San Diego Association of Realtors  
South County Service Center  
884 Eastlake Parkway, Suite 1629  
Chula Vista, CA 91914

Seth Litchney, Senior Regional Planner  
SANDAG  
401 B Street, Ste. 800  
San Diego, CA 92101

Jennifer Seeger, Assistant Deputy Director of  
Housing Policy  
CA Dept. of HCD  
2020 West El Camino Avenue  
Sacramento, CA 95833

San Diego Job Corps Center  
1325 Iris Avenue, Building 60  
Imperial Beach, CA 91932-3751

Catherine A. Rodman, Director & Supervising  
Attorney  
Affordable Housing Advocates  
427 C Street, Suite 304  
San Diego, CA 92101

San Diego Association of Realtors  
4845 Ronson Court  
San Diego, CA 92111

Valerie Acevez  
Imperial Beach Chamber of Commerce  
PO Box 506  
Imperial Beach, CA 91932-1871

St James Lutheran Senior Housing  
Falkenberg/Gilliam & Associates Managed  
Properties  
1560 W Colorado Blvd  
Pasadena, CA 91105-1415

San Diego Interfaith Housing Federation  
7956 Lester Avenue  
Lemon Grove, CA 91945

Joseph Sanchez  
AS Development  
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Affirmed Housing  
13520 Evening Creek Dr N,  
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Neighborhood House Association  
841 South 41 St.,  
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## **A.2 Public Meetings**

### ***August 26, 2020- City Council Special Workshop Meeting***

The City conducted an online Community Workshop to introduce the Housing Element and its requirements to the public and to receive comments on the community's housing needs. Public comments received focus on three themes:

- The City should not adopt inclusionary housing, which would worsen parking issues
- Affordable housing should be smoke free
- ADU permit fees are too high and the City should look into pre-approved plans (such as those offered by the City of San Diego)

### ***January 20, 2021 – City Council Draft Housing Element Review***

Several comments were made at the Council meeting:

- Encouraged the City to include smoke free policy in the Housing Element, requiring all affordable housing developments to be smoke free.
- The community needs more housing and that the City should facilitate the development of housing such as ADUs.
- Concerns were expressed about the RHNA and that it would result in displacement of existing residents.

## **A.3 Public Comments Received**

The City received communications from St. James Plaza and St. James Lutheran Church, expressing interest in utilizing a vacant lot owned by the Church and currently used as a garden for affordable housing. The City also received a comment letter from the San Diego Housing Federation (attached). The revised Final Draft Housing Element includes an extensive AFFH analysis. Both the Housing Element and the AFFH analysis have been found to comply with State law by HCD.



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March 22, 2021

Ms. Meagan Openshaw  
Associate Planner  
City of Imperial Beach  
825 Imperial Beach Blvd.  
Imperial Beach, CA 91932  
Submitted via email: [mopenshaw@imperialbeachca.gov](mailto:mopenshaw@imperialbeachca.gov)

**Re: Draft 6<sup>th</sup> Cycle Housing Element**

Dear Ms. Openshaw:

On behalf of the San Diego Housing Federation, we are writing to provide comments and feedback on the draft 6<sup>th</sup> Cycle Housing Element for the City of Imperial Beach.

The draft Housing Element contains several actionable items that will help Imperial Beach make progress toward meeting its housing goals. In particular, the city’s residential recycling program, incentives for development of affordable housing, and planned updates to conform with new state laws are noteworthy. We applaud these components of the draft Housing Element and would like to make some additional recommendations to strengthen the plan’s impact on achieving housing goals.

**Implementing State Legislation**

The San Diego Housing Federation was a proud co-sponsor of AB 1486, a bill that strengthened and clarified the state’s Surplus Land Act. City implementation of this bill will advance Goal #1, Policy 1.2 to facilitate development of affordable housing through use of financial and/or regulatory incentives when feasible (H-87). Identifying unused City-owned sites for housing can help to ensure the City is compliant with the State Surplus Land Act and helps support the development of affordable housing.

We are pleased to see the Housing Element recognize the many changes to state Density Bonus law since the 5<sup>th</sup> Cycle (H-54). We recommend that the City move quickly to implement AB 1763, a bill we supported which provides a density bonus for developments that are 100 percent affordable, to serve as a tool for building affordable housing. The City should also work to implement AB 2345, a bill we supported that builds on the success of the City of San Diego’s Affordable Homes Bonus Program (AHBP) by taking the program statewide. A report by Circulate San Diego, “[Equity and Climate for Homes](#),” found that 63 percent of AHBP projects were located in high and highest resource census tracts, demonstrating the program’s role in affirmatively furthering fair housing.

**Local funding for affordable housing**

The draft Housing Element recognizes the need for funding to build housing that is affordable to low-income individuals and families and that federal and state funding is a critical piece to the resources puzzle. We recommend that the Housing Element specifically include a goal to prioritize

**San Diego’s Voice for Affordable Housing**



funds made available through the Permanent Local Housing Allocation (PLHA), also known as the Building Homes and Jobs Act ([SB 2, 2017](#)), for the development of deed-restricted affordable housing. Maximizing the use of these funds to build housing for extremely low-, very low-, and moderate income households will help the City meet its RHNA obligations. Additionally, as local gap financing is critical, we encourage the City to consider dedicating former redevelopment funds, sometimes called “boomerang funds,” as a local source of funding for affordable housing.

**Affirmatively furthering fair housing and equity**

As noted in the housing element, approximately 60 percent of Imperial Beach households had lower incomes, a much higher lower income population compared to San Diego County’s overall lower income population at 43 percent (H-11). The demographics of Imperial Beach demonstrate the need to both create more opportunity via mixed-income housing but also to make plans to address the risk of displacement for current residents. We applaud Program 9 to update the City’s Zoning Ordinance to comply with AB 1397 to provide by-right approval for projects with 20 percent affordable units (H-95) as well as Policy 4.2 to facilitate preservation of housing affordable to lower and moderate income households.

In regard to the goals and policies outlined in 5.1.5 to affirmatively further fair housing in Imperial Beach, we recommend that the City work with HCD on AFFH guidance as they relate specifically to Housing Elements and incorporate those recommendations in the plan.

**Housing and Climate Change**

Our September 2016 report, “[Location Matters: Affordable Housing and VMT Reduction in San Diego County](#),” found that lower-income households are more likely to live in transit-rich areas, own fewer cars, are likely to live in larger building and smaller units, all factors that make affordable housing near transit a key greenhouse gas reduction strategy. While the City’s Climate Action Plan calls for increasing mass transit ridership (page 29), the Housing Element makes no mention of dense, deed-restricted affordable housing as a greenhouse gas reduction tool. We urge the City to examine the role of affordable housing in helping the City to meet both its RHNA obligations and its Climate Action Plan goals.

We thank you for consideration of our feedback and comments. We appreciate the time and effort that staff have dedicated to the draft Housing Element document and look forward to supporting Imperial Beach in adopting a robust plan that will help to meet the City’s housing goals.

Sincerely,



Laura Nunn  
Chief of Policy & Education

**San Diego’s Voice for Affordable Housing**

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## **Appendix B: Review of Previous Housing Element (2013-2021)**

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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.
- The effectiveness of the city's programs on the special needs population

This appendix documents the City's achievements under the 2013-2021 Housing Element with respect to the actions and objectives contained therein. This Appendix also contains recommendations for program retention, revision, deletion or addition to address current and projected needs and State requirements between 2021 and 2029.

The Housing Element outlined the following goals for the City of Imperial Beach for the 2013-2021 planning period:

- Goal 1: Meet the housing needs of existing and future needs of the community.
- 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.
- Goal 3: Expand homeownership opportunities to increase the proportion of owner-occupied housing units.
- Goal 4: Maintain, preserve, and enhance existing housing to build stronger and more vibrant residential neighborhoods.
- 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.

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 City has limited resources to directly address the housing needs for extremely low and special needs households. However, the City utilizes density bonus to incentivize housing for large families. Within the mixed use zone, the City offers density bonus for projects that include 25 percent of the units with three or more bedrooms. In addition, through its CDBG program, the City addresses the supportive needs of seniors and persons with disabilities. Through the preservation of at-risk housing, the City also works to conserve housing for special needs groups, especially for seniors.

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
<b>Housing Conservation and Improvement</b>				
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 mobile homes.	The City will 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	Between 2013 and 2020, zero (0) Imperial Beach households received assistance through the County's Home Repair Program.  <b>Continued Appropriateness:</b> The 6 <sup>th</sup> cycle Housing Element will continue this 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.	Annually apply to the San Diego Urban County for CDBG funds. Complete <u>16</u> infrastructure improvement projects that serve lower income neighborhoods by 2021.	Between FY 2013 and FY 2019, the City received approximately \$828,870 in CDBG through the Urban County program. The City used these funds for: <ul style="list-style-type: none"> <li>• A new fire engine for the Imperial Beach Fire Station</li> <li>• Park improvements at Rose Teeple Memorial Park</li> <li>• Imperial Beach Blvd Pedestrian Crosswalk Project</li> <li>• Rose Teeple Park Improvements Project</li> <li>• Marina Vista Senior Center Phase I Design</li> <li>• A new fire engine for the Imperial Beach Fire Station</li> </ul>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
				<p>All projects were either located in low income areas or served primarily low income population as a requirement to receive CDBG funds.</p> <p><b>Continued Appropriateness:</b> 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.</p>
3	Clean and Green	<p>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.</p>	<p>Publicize City program on website and at public counters.</p> <p>Assist 30 lower and 30 moderate income households by 2021.</p>	<p>The City budgeted \$380,000 budgeted for 10 homes in FY 2013. Twelve (12) Clean and Green projects were completed in FY 2013. The program was terminated in FY 2014 due to the elimination of redevelopment agencies.</p> <p><b>Continued Appropriateness:</b> This program is removed from the 6<sup>th</sup> cycle Housing Element.</p>
4	Conservation of Existing and Future Affordable Units	<p>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.</p>	<p><i>Monitor Units at Risk:</i> Ongoing monitoring of the status of units within the St. James Plaza development.</p> <p><i>Tenant Education:</i> 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.</p> <p><i>Assist Tenants of Existing Rent Restricted Units to Obtain Housing Choice Voucher Assistance:</i> Six months prior to conversion, the City will assist tenants of "at risk" units to obtain</p>	<p>In 2014, St. James Plaza extended its contract with HUD through 2035.</p> <p><b>Continued Appropriateness:</b> Within the 2021-2029 "at-risk" housing analysis period, no projects are considered at risk of converting to market-rate housing. This program is revised to focus on the monitoring efforts.</p>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
			Housing Choice Vouchers through the County of San Diego County, Department of Housing and Community Development.	
5	Coastal Zone Monitoring	<p>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:</p> <ul style="list-style-type: none"> <li>• Maintain records of existing housing units serving lower and moderate income households in the Coastal Zone areas;</li> <li>• 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</li> <li>• Enforce applicable affordability covenants.</li> </ul>	<p>Begin maintaining records in 2013.</p> <p>Ongoing tracking of new construction, demolition, and conversion of affordable units within the Coastal Zone.</p>	<p>Since the City began tracking units in the Coastal Zone in 2013, six affordable units have been built. The six affordable units were constructed as part of a project at 988-998 Donax Ave. The project received discretionary approvals in 2014 and was constructed in 2016.</p> <p>In addition, since 2013, 276 new units were built in the Coastal Zone. These new construction units include units that were built on vacant land or where existing structures were demolished and new ones were built. The following shows the net density gained between 2013 and 2020:</p> <ul style="list-style-type: none"> <li>• 15 ADU units were added</li> <li>• 26 new housing units were built on empty lots</li> <li>• 27 new single-family units were built on existing single-family home sites</li> <li>• 22 new multifamily units were built existing single-family home sites</li> <li>• 187 new units were built on an existing RV lot</li> </ul> <p>Three sites were converted to be used for housing for a net gain of 13 housing units. In one project, 11 residential units with commercial space were built in an existing commercial-mixed site (there were 9 existing units, for a net gain of 2 units). For the second project, 8 housing units were built in an existing commercial site (net gain of 8 units). For the third project, 3 housing units were built on an existing commercial site (net gain 3 units). In</p>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
				<p>addition, seven (7) new single-family units replaced four duplexes for a net loss of 1 unit.</p> <p>Given the nature of the development activities, the City has not incurred any replacement requirements.</p> <p><b>Continued Appropriateness:</b> Monitoring of Coastal Zone housing activities is required the State law. The 6<sup>th</sup> cycle Housing Element will continue this program.</p>
<b>Housing Assistance</b>				
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 incentives to private developers along with information regarding the availability of funding through federal and State housing assistance.	<p>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.</p> <p>Continue to provide regulatory and technical assistance to affordable housing developers.</p> <p>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.</p>	<p>Between 2013 and 2019, 35 affordable units were constructed with American Legion/ Hitzke Development (29 units) and Habitat for Humanity (6 units). Since the loss of redevelopment set-aside, the City has explored cap &amp; trade housing funds. However, no project was funded under this program.</p> <p>On March 16, 2016, the City Council adopted Ordinance 2016-1155 to include State density bonus provisions.</p> <p><b>Continued Appropriateness:</b> The City will continue to offer incentives for affordable housing development. This program is included in the 2021-2029 Housing Element. The City intends to revise the Zoning Ordinance to include the State density bonus provisions of AB 1763 and AB 2345 within six months of Housing Element adoption.</p>
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	Continue to promote the Housing Choice Voucher program to residents and property owners through dissemination of brochures at public counters,	As of July 20, 2020, there are 395 participants in the County Section 8 Program leased in the City of Imperial Beach. Approximately 96 percent of

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
		<p>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.</p>	<p>providing information on the City's website, and referring residents and property owners to the County of San Diego, Department of Community Development.</p> <p>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.</p>	<p>participants (190) are lower income (&lt;50 percent AMI).</p> <p><b>Continued Appropriateness:</b> The HCV program remains one of the few resources for extremely low income households. The 6<sup>th</sup> cycle Housing Element includes working with the County and fair housing service provider(s) to educate tenants about the new source of income protection in California that recognizes public assistance as a legitimate source of income when evaluating ability to pay rents in rental applications.</p>
8	First-Time Homebuyer Programs	<p>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:</p>	<p>Continue to promote the DCCA, MCC, and CHDAP programs to residents through dissemination of brochures at public counters, providing information on City website</p> <p>Refer residents to the County of San Diego, Department of Community Development, and the California Housing Finance Agency for assistance.</p>	<p>The City continues to refer homebuyers to the County's program.</p> <p><b>Continued Appropriateness:</b> Resources for homebuyer assistance are limited, especially in light of the rising home prices. This program is continued in the 6<sup>th</sup> cycle Housing Element.</p>
<b>Provision of Adequate Housing Sites</b>				
9	Residential Sites Inventory	<p>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</p>	<p>Monitor status of vacant and underutilized sites.</p> <p>Provide information on available sites and development incentives to interested developers and property owners.</p>	<p>Between 2013 and 2020, the City monitored vacant and underutilized sites. A total of 345 housing units have been constructed between 2013 and 2019.</p> <p><b>Continued Appropriateness:</b> The 6<sup>th</sup> cycle Housing Element includes an updated sites inventory for the City's RHNA of 1,329 units.</p>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
		underutilized sites and will continue to provide sites information to interested developers.		
10	Mixed Use Development Sites	<p>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 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:</p> <p>The City adopted the Zoning Ordinance amendment on August 15, 2012.</p>	<p>Pursue Local Coastal Plan amendment certification by the Coastal Commission in 2012-2013.</p> <p>Promote mixed use development opportunities to developers and property owners.</p>	<p>The California Coastal Commission certified the Zoning Amendment in 2013 (LCP Amendment No. IMB-MAJ-2-12) and 2017 (LCP Amendment No. LCP-6-IMB-17-0044-1).</p> <p><b>Continued Appropriateness:</b> The updated sites inventory includes development potential in the Mixed Use zones. This program is merged with Program 9.</p>
<b>Removal of Government Constraints</b>				
11	Lot Consolidation Program	<p>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.</p>	<p>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.</p> <p>Promote the program through dissemination of brochures at public counters and providing information on City website.</p>	<p>A Zoning Amendment was initiated in 2014 but City Council declined to adopt the zoning amendment due to ineffective housing yield and community opposition in 2015.</p> <p>New State laws on Accessory Dwelling Units (ADUs) have expanded the opportunity for increased units in residential lots. Furthermore, the City has seen a consistent trend of recycling of lower intensity uses on medium to high density residential properties.</p> <p><b>Continued Appropriateness:</b> The new State law requirements on adequate sites (AB 1397), which disqualifies sites smaller than 0.5 acre as feasible for affordable housing for lower income. The 6<sup>th</sup> cycle Housing Element includes a program to</p>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
		<p>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.</p>		<p>facilitate lot consolidation of C-MU and SMU/RO properties.</p>
12	Density Bonus Ordinance	<p>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. 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.</p>	<p>Revise the Zoning Ordinance to update density bonus provisions consistent with State law within one year of adoption of the Housing Element.</p> <p>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.</p>	<p>The Zoning Amendment adopted by City Council Aug 6, 2014 (Ord. 2014-1146) and certified by the Coastal Commission on May 16, 2016.</p> <p><b>Continued Appropriateness:</b> Recent changes to State density bonus law necessitate an update to the City's Density Bonus Ordinance. The 6<sup>th</sup> cycle Housing Element includes an updated program to address new density bonus provisions.</p>
13	Housing for Homeless, Special Needs, and Extremely Low-Income Households	<p>The City will amend the Zoning Ordinance to address the provision of housing opportunities for the homeless and those with special needs:</p> <ul style="list-style-type: none"> <li>• Manufactured Homes</li> <li>• Transitional and Supportive Housing</li> <li>• Single-Room Occupancy Units</li> <li>• Reasonable Accommodation for Persons with Disabilities</li> </ul>	<p>Revise the Zoning Ordinance within one year of adoption of the Housing Element to address housing for the homeless and special needs groups.</p>	<p>The Zoning Amendment adopted by City Council Aug 6, 2014 (Ord. 2014-1146) and certified by the Coastal Commission on May 16, 2016.</p> <p>The City continues to participate in the Housing Choice Vouchers (HCV) program, which provides preferences for assistance in the following categories:</p> <ul style="list-style-type: none"> <li>• Families with dependent children</li> </ul>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
		<ul style="list-style-type: none"> <li>• Senior Housing</li> <li>• Employee Housing</li> </ul>		<ul style="list-style-type: none"> <li>• Working families</li> <li>• Elderly families</li> <li>• Disabled families</li> <li>• Veterans</li> <li>• Homeless</li> </ul> <p>With limited funding, the HCV program is the most effective program for addressing the special housing needs in Imperial Beach. Currently about 395 households are assisted under the HCV program.</p> <p><b>Continued Appropriateness:</b> Recent housing bills passed between 2017 and 2019 require updating to the Zoning Ordinance for emergency shelters, low barrier navigation centers, supportive housing, and density bonus for 100 percent affordable projects. The 6<sup>th</sup> cycle Housing Element includes an updated program to address these requirements.</p>
<b>Promotion of Equal Housing Opportunity</b>				
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.	<p>Continue to participate in the County's Fair Housing Program a fair housing service provider for fair housing and tenant/landlord dispute resolution services.</p> <p>Continue to disseminate fair housing information and referring complaints to appropriate agencies.</p> <p>Continue to participate in the Analysis of Impediments to Fair Housing Choice update due in 2016.</p>	<p>The City of Imperial Beach participates in the Community Development Block Grant program as part of the Urban County. Fair housing services are offered to the City through the CDBG program. Legal Aid Society of San Diego (LASSD) provides fair housing services to the City of Imperial Beach. Between 2014 and 2019, LASSD served 341 Imperial Beach residents. In addition, CSA San Diego, another fair housing provider, tested for discrimination based on national origin at one site and showed disparate treatment in FY 2020.</p> <p>The City of Imperial Beach also participated in the 2015-2019 and 2020-2024 updates of the San Diego County Regional Analysis of Impediments</p>

**Table B-1: Review of Accomplishments**

Prog #	Program Name	Description	2013-2021 Objectives	Progress and Continued Appropriateness
		The City will continue to refer fair housing complaints to appropriate agencies.		<p>(AI). As of October 2020, the Regional AI has been accepted by all participating jurisdictions except the County. Due to COVID-19, the County has to prioritize items to be agendized for Board of Supervisors consideration. The BOS will consider the Regional AI in 2021.</p> <p><b>Continued Appropriateness:</b> New State law mandates programs and policies to further fair housing in the community. This program is expanded in the 6<sup>th</sup> cycle Housing Element to include specific actions from the San Diego Regional Analysis of Impediments to Fair Housing Choice completed in Summer 2020.</p>

<b>Table B-2: Progress in Achieving Quantified Objectives 2013-2021</b>		
<b>Program Category</b>	<b>Quantified Objective</b>	<b>Progress</b>
<b>New Construction (RHNA 2013-2021<sup>1</sup>)</b>		
Very Low*	63	3
Low	48	32
Moderate	45	5
Above Moderate	98	305
Total	254	345
<b>Rehabilitation (Clean and Green)</b>		
Extremely Low	5	12
Very Low	5	
Low	20	
Moderate	30	
Above Moderate	-	
Total	60	12
<b>Housing Assistance (Housing Choice Voucher)</b>		
Extremely Low	215	330
Very Low	200	50
Low	-	15
Moderate	-	-
Above Moderate	-	-
Total	415	395
<b>Housing Conservation (At-Risk Housing)</b>		
Extremely Low	45	45
Very Low	44	44
Low		
Moderate	-	-
Above Moderate	-	-
Total	99	99
<sup>1</sup> Numbers listed show progress as of APR 2019. <sup>2</sup> APR only shows "very low" income category and does not separate them into extremely low and very low category.		

## Appendix C: Residential Sites Inventory

Table C-1: Residential Recycling Sites

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6260600600	Two-Family Detached Residential	R-3000-D	2.28	1	1984	14	26	25	0.65	No
6263421500	Medium Density Residential	R-2000	0.43	0		21	7	7	-	Yes
6250113203	High Density Residential	R-1500	0.26	1	1982	29	6	5	0.86	No
6331611200	Medium Density Residential	R-2000	0.36	1	1940	21	6	5	0.26	No
6320101000	High Density Residential	R-1500	0.23	1	1937	29	5	4	0.48	No
6331611800	Medium Density Residential	R-2000	0.27	1	1955	21	5	4	0.57	No
6320100800	High Density Residential	R-1500	0.12	0		29	3	3	-	Yes
6320401700	High Density Residential	R-1500	0.25	3	1961	29	6	3	0.27	No
6331611400	Medium Density Residential	R-2000	0.25	1	1935	21	4	3	0.64	No
6253611300	Medium Density Residential	R-2000	0.22	1	1950	21	4	3	0.52	No
6331713300	Medium Density Residential	R-2000	0.38	3	1940	21	6	3	0.39	No
6331721600	Medium Density Residential	R-2000	0.30	2	1959	21	5	3	0.95	No
6253621300	Medium Density Residential	R-2000	0.22	1	1948	21	4	3	0.44	No
6330412800	Two-Family Residential	R-3000	0.38	1	1955	14	4	3	0.60	No
6261810800	Two-Family Detached Residential	R-3000-D	0.40	1	1953	14	4	3	0.81	No
6254304900	Two-Family Detached Residential	R-3000-D	0.34	1	1946	14	4	3	0.87	No
6261132200	Two-Family Detached Residential	R-3000-D	0.33	1	1939	14	4	3	0.33	No
6260103300	Two-Family Detached Residential	R-3000-D	0.44	2	1961	14	5	3	0.74	No
6263721500	Single Family Residential	R-1-3800	0.29	1	1958	11	3	2	0.48	No
6272406600	High Density Residential	R-1500	0.19	2	1960	29	4	2	0.87	No
6320101100	High Density Residential	R-1500	0.12	1	1950	29	3	2	0.37	No
6320200300	High Density Residential	R-1500	0.13	1	1981	29	3	2	0.27	No
6320200700	High Density Residential	R-1500	0.13	1	1937	29	3	2	0.04	No
6320100500	High Density Residential	R-1500	0.12	1	1954	29	3	2	0.47	No
6250111400	High Density Residential	R-1500	0.07	0		29	2	2	-	Yes

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6321304100	Medium Density Residential	R-2000	0.18	1	1972	21	3	2	0.43	No
6331710100	Medium Density Residential	R-2000	0.15	1	1962	21	3	2	0.93	No
6332233700	Medium Density Residential	R-2000	0.16	1	1959	21	3	2	0.71	No
6252730600	Medium Density Residential	R-2000	0.11	0		21	2	2	-	Yes
6254211600	Medium Density Residential	R-2000	0.15	1	1949	21	3	2	0.43	No
6254211800	Medium Density Residential	R-2000	0.15	1	1949	21	3	2	0.52	No
6254030400	Medium Density Residential	R-2000	0.11	0		21	2	2	-	Yes
6321220500	Medium Density Residential	R-2000	0.17	1	1963	21	3	2	0.15	No
6321221200	Medium Density Residential	R-2000	0.17	1	1955	21	3	2	0.44	No
6321222600	Medium Density Residential	R-2000	0.16	1	1947	21	3	2	0.60	No
6254031500	Medium Density Residential	R-2000	0.21	2	1980	21	4	2	0.81	No
6321302400	Medium Density Residential	R-2000	0.15	1	1957	21	3	2	0.43	No
6252710300	Medium Density Residential	R-2000	0.11	0		21	2	2	-	Yes
6272100100	Two-Family Residential	R-3000	0.24	1	1945	14	3	2	0.67	No
6330912602	Two-Family Residential	R-3000	0.29	1	1960	14	3	2	0.45	No
6271111200	Two-Family Residential	R-3000	0.23	1	1954	14	3	2	1.00	No
6271111500	Two-Family Residential	R-3000	0.26	1	1940	14	3	2	0.53	No
6263410800	Two-Family Residential	R-3000	0.26	1	1951	14	3	2	0.87	No
6264611400	Two-Family Residential	R-3000	0.24	1	1963	14	3	2	0.62	No
6264910400	Two-Family Residential	R-3000	0.25	1	1958	14	3	2	0.60	No
6263320600	Two-Family Residential	R-3000	0.30	1	1967	14	3	2	0.88	No
6331508100	Two-Family Residential	R-3000	0.31	2	1943	14	4	2	0.93	No
6264621700	Two-Family Residential	R-3000	0.24	1	1947	14	3	2	0.53	No
6330113104	Two-Family Residential	R-3000	0.28	1		14	3	2	0.82	No
6330111000	Two-Family Residential	R-3000	0.29	1	1940	14	3	2	0.47	No
6264811300	Two-Family Residential	R-3000	0.26	1	1946	14	3	2	0.57	No
6261412300	Two-Family Detached Residential	R-3000-D	0.26	1	1970	14	3	2	0.73	No
6260823200	Two-Family Detached Residential	R-3000-D	0.17	0		14	2	2	-	Yes

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6261931700	Two-Family Detached Residential	R-3000-D	0.18	0		14	2	2	-	Yes
6263741100	Single Family Residential	R-1-3800	0.22	1	1946	11	2	1	0.84	No
6263741000	Single Family Residential	R-1-3800	0.22	1	1954	11	2	1	0.67	No
6263830900	Single Family Residential	R-1-3800	0.18	1	1953	11	2	1	0.75	No
6263831000	Single Family Residential	R-1-3800	0.18	1	1955	11	2	1	0.59	No
6263830700	Single Family Residential	R-1-3800	0.18	1	1927	11	2	1	0.57	No
6263821300	Single Family Residential	R-1-3800	0.19	1	1949	11	2	1	0.27	No
6263962100	Single Family Residential	R-1-3800	0.18	1	1953	11	2	1	0.38	No
6320100700	High Density Residential	R-1500	0.12	2	1945	29	3	1	0.10	No
6250112900	High Density Residential	R-1500	0.11	1	1952	29	2	1	0.20	No
6250242100	Single Family Residential	R-1-6000	0.11	0		7	1	1	-	Yes
6323904900	Single Family Residential	R-1-6000	0.34	1	1951	7	2	1	0.88	No
6320923900	Single Family Residential	R-1-6000	0.15	0		7	1	1	-	Yes
6261012800	Single Family Residential	R-1-6000	0.34	1	1950	7	2	1	0.95	No
6253611200	Medium Density Residential	R-2000	0.10	1	1958	21	2	1	0.88	No
6254021000	Medium Density Residential	R-2000	0.10	1	1962	21	2	1	0.40	No
6252021100	Medium Density Residential	R-2000	0.12	1	1941	21	2	1	0.94	No
6332231300	Medium Density Residential	R-2000	0.10	1	1965	21	2	1	0.95	No
6331711300	Medium Density Residential	R-2000	0.13	1	1957	21	2	1	0.71	No
6331711400	Medium Density Residential	R-2000	0.15	1	1959	21	2	1	0.64	No
6252030100	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.77	No
6252730500	Medium Density Residential	R-2000	0.11	1	1951	21	2	1	0.29	No
6253511100	Medium Density Residential	R-2000	0.11	1	1950	21	2	1	0.11	No
6253610900	Medium Density Residential	R-2000	0.11	1	1947	21	2	1	0.93	No
6253611100	Medium Density Residential	R-2000	0.12	1	1949	21	2	1	0.80	No
6252731800	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.69	No
6252731900	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.55	No
6254211200	Medium Density Residential	R-2000	0.14	1	1949	21	2	1	0.69	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6254211300	Medium Density Residential	R-2000	0.14	1	1949	21	2	1	0.56	No
6254211400	Medium Density Residential	R-2000	0.15	1	1949	21	2	1	0.51	No
6254211900	Medium Density Residential	R-2000	0.15	1	1949	21	2	1	0.44	No
6254212100	Medium Density Residential	R-2000	0.15	1	1949	21	2	1	0.90	No
6253921400	Medium Density Residential	R-2000	0.11	1	1954	21	2	1	0.38	No
6253921600	Medium Density Residential	R-2000	0.11	1	1955	21	2	1	0.45	No
6253922200	Medium Density Residential	R-2000	0.11	1	1940	21	2	1	0.27	No
6254030500	Medium Density Residential	R-2000	0.11	1	1955	21	2	1	0.63	No
6254030700	Medium Density Residential	R-2000	0.10	1	1953	21	2	1	0.85	No
6254030800	Medium Density Residential	R-2000	0.11	1	1959	21	2	1	0.85	No
6251910700	Medium Density Residential	R-2000	0.12	1	1947	21	2	1	0.73	No
6251910800	Medium Density Residential	R-2000	0.12	1	1947	21	2	1	0.92	No
6251911200	Medium Density Residential	R-2000	0.12	1	1947	21	2	1	0.77	No
6251911300	Medium Density Residential	R-2000	0.12	1	1947	21	2	1	0.42	No
6252020400	Medium Density Residential	R-2000	0.12	1	1929	21	2	1	0.92	No
6252020500	Medium Density Residential	R-2000	0.12	1	1939	21	2	1	0.76	No
6252020600	Medium Density Residential	R-2000	0.12	1	1929	21	2	1	0.15	No
6252020900	Medium Density Residential	R-2000	0.12	1	1949	21	2	1	0.38	No
6252810400	Medium Density Residential	R-2000	0.11	1	1958	21	2	1	0.88	No
6252821000	Medium Density Residential	R-2000	0.10	1	1945	21	2	1	0.64	No
6253511800	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.22	No
6253522400	Medium Density Residential	R-2000	0.11	1	1936	21	2	1	0.48	No
6253611500	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.92	No
6253611600	Medium Density Residential	R-2000	0.11	1	1950	21	2	1	0.87	No
6331506600	Medium Density Residential	R-2000	0.32	4	1959	21	5	1	0.97	No
6252021600	Medium Density Residential	R-2000	0.12	1	1953	21	2	1	0.55	No
6252022000	Medium Density Residential	R-2000	0.12	1	1952	21	2	1	0.46	No
6252022100	Medium Density Residential	R-2000	0.12	1	1952	21	2	1	0.25	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6252022200	Medium Density Residential	R-2000	0.12	1	1952	21	2	1	0.92	No
6253521300	Medium Density Residential	R-2000	0.11	1	1947	21	2	1	0.31	No
6253521500	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.77	No
6254010400	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.88	No
6254010500	Medium Density Residential	R-2000	0.10	1	1933	21	2	1	0.81	No
6254010600	Medium Density Residential	R-2000	0.10	1	1952	21	2	1	0.74	No
6253531500	Medium Density Residential	R-2000	0.11	1	1947	21	2	1	0.83	No
6253531700	Medium Density Residential	R-2000	0.11	1	1955	21	2	1	0.96	No
6253910400	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.30	No
6254020500	Medium Density Residential	R-2000	0.11	1	1951	21	2	1	0.84	No
6254020600	Medium Density Residential	R-2000	0.11	1	1953	21	2	1	0.52	No
6321221400	Medium Density Residential	R-2000	0.12	1	1953	21	2	1	0.57	No
6253911300	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.54	No
6253911700	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.29	No
6253920600	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.31	No
6253920800	Medium Density Residential	R-2000	0.11	1	1956	21	2	1	0.21	No
6253920900	Medium Density Residential	R-2000	0.11	1	1955	21	2	1	0.62	No
6254021100	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.92	No
6254021200	Medium Density Residential	R-2000	0.11	1	1953	21	2	1	0.62	No
6254021400	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.29	No
6254021500	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.83	No
6254021900	Medium Density Residential	R-2000	0.11	1	1939	21	2	1	0.40	No
6254022000	Medium Density Residential	R-2000	0.11	1	1938	21	2	1	0.80	No
6254022100	Medium Density Residential	R-2000	0.12	1	1938	21	2	1	0.33	No
6254031900	Medium Density Residential	R-2000	0.11	1	1948	21	2	1	0.88	No
6332233600	Medium Density Residential	R-2000	0.10	1	1958	21	2	1	0.68	No
6332323100	Medium Density Residential	R-2000	0.14	1	1958	21	2	1	0.08	No
6331610700	Medium Density Residential	R-2000	0.15	1	1940	21	2	1	0.47	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6331711900	Medium Density Residential	R-2000	0.11	1	1959	21	2	1	0.82	No
6332230700	Medium Density Residential	R-2000	0.12	1	1959	21	2	1	0.47	No
6332310500	Medium Density Residential	R-2000	0.15	1	1959	21	2	1	0.93	No
6252710400	Medium Density Residential	R-2000	0.10	1	1925	21	2	1	0.09	No
6254011700	Medium Density Residential	R-2000	0.11	1	1964	21	2	1	0.42	No
6321220200	Medium Density Residential	R-2000	0.10	1	1965	21	2	1	0.38	No
6321304300	Medium Density Residential	R-2000	0.12	1	1958	21	2	1	0.88	No
6252831200	Medium Density Residential	R-2000	0.11	1	1950	21	2	1	0.88	No
6252831100	Medium Density Residential	R-2000	0.11	1	1950	21	2	1	0.71	No
6252831000	Medium Density Residential	R-2000	0.11	1	1950	21	2	1	0.55	No
6252830800	Medium Density Residential	R-2000	0.11	1	1951	21	2	1	0.07	No
6251922300	Medium Density Residential	R-2000	0.10	1	1953	21	2	1	0.77	No
6251921000	Medium Density Residential	R-2000	0.12	1	1951	21	2	1	0.67	No
6251921800	Medium Density Residential	R-2000	0.12	1	1950	21	2	1	0.73	No
6251921700	Medium Density Residential	R-2000	0.12	1	1950	21	2	1	0.77	No
6251921600	Medium Density Residential	R-2000	0.12	1	1945	21	2	1	0.78	No
6251922100	Medium Density Residential	R-2000	0.12	1	1954	21	2	1	0.22	No
6251922200	Medium Density Residential	R-2000	0.12	1	1950	21	2	1	0.92	No
6251921100	Medium Density Residential	R-2000	0.12	1	1948	21	2	1	0.50	No
6251921300	Medium Density Residential	R-2000	0.12	1	1955	21	2	1	0.07	No
6251921500	Medium Density Residential	R-2000	0.12	1	1947	21	2	1	0.62	No
6252011700	Medium Density Residential	R-2000	0.12	1	1929	21	2	1	0.63	No
6252012000	Medium Density Residential	R-2000	0.12	1	1948	21	2	1	0.77	No
6252012200	Medium Density Residential	R-2000	0.11	1	1949	21	2	1	0.02	No
6252012100	Medium Density Residential	R-2000	0.12	1	1942	21	2	1	0.80	No
6252011600	Medium Density Residential	R-2000	0.11	1	1941	21	2	1	0.67	No
6252012300	Medium Density Residential	R-2000	0.12	1	1940	21	2	1	0.02	No
6251930800	Medium Density Residential	R-2000	0.11	1	1941	21	2	1	0.17	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6251931100	Medium Density Residential	R-2000	0.11	1	1943	21	2	1	0.51	No
6253620900	Medium Density Residential	R-2000	0.11	1	1956	21	2	1	0.74	No
6253620300	Medium Density Residential	R-2000	0.11	1	1946	21	2	1	0.15	No
6253620600	Medium Density Residential	R-2000	0.11	1	1945	21	2	1	0.67	No
6253620700	Medium Density Residential	R-2000	0.11	1	1947	21	2	1	0.92	No
6253621100	Medium Density Residential	R-2000	0.11	1	1921	21	2	1	0.51	No
6321303300	Medium Density Residential	R-2000	0.12	1	1961	21	2	1	0.43	No
6252721000	Medium Density Residential	R-2000	0.10	1	1951	21	2	1	0.60	No
6252720800	Medium Density Residential	R-2000	0.11	1	1952	21	2	1	0.19	No
6330422400	Two-Family Residential	R-3000	0.14	1	1942	14	2	1	0.15	No
6330111600	Two-Family Residential	R-3000	0.14	1	1945	14	2	1	0.91	No
6330112700	Two-Family Residential	R-3000	0.15	1	1933	14	2	1	0.67	No
6330821700	Two-Family Residential	R-3000	0.15	1	1969	14	2	1	0.67	No
6330822000	Two-Family Residential	R-3000	0.15	1	1959	14	2	1	0.75	No
6330822100	Two-Family Residential	R-3000	0.17	1	1942	14	2	1	0.51	No
6330910400	Two-Family Residential	R-3000	0.15	1	1947	14	2	1	0.29	No
6330121200	Two-Family Residential	R-3000	0.15	1	1955	14	2	1	0.78	No
6330210500	Two-Family Residential	R-3000	0.15	1	1963	14	2	1	0.51	No
6331012900	Two-Family Residential	R-3000	0.15	1	1950	14	2	1	0.95	No
6331110300	Two-Family Residential	R-3000	0.15	1	1955	14	2	1	0.76	No
6331110400	Two-Family Residential	R-3000	0.14	1	1940	14	2	1	0.48	No
6331110600	Two-Family Residential	R-3000	0.14	1	1953	14	2	1	0.81	No
6331110700	Two-Family Residential	R-3000	0.15	1	1957	14	2	1	0.63	No
6330320800	Two-Family Residential	R-3000	0.15	1	1951	14	2	1	0.82	No
6330321000	Two-Family Residential	R-3000	0.14	1	1957	14	2	1	0.77	No
6330410700	Two-Family Residential	R-3000	0.14	1	1956	14	2	1	0.26	No
6330410800	Two-Family Residential	R-3000	0.14	1	1954	14	2	1	0.50	No
6330421100	Two-Family Residential	R-3000	0.15	1	1945	14	2	1	0.61	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6330421400	Two-Family Residential	R-3000	0.14	1	1963	14	2	1	0.66	No
6330422800	Two-Family Residential	R-3000	0.16	1	1959	14	2	1	0.83	No
6331120800	Two-Family Residential	R-3000	0.20	1	1953	14	2	1	0.95	No
6331120900	Two-Family Residential	R-3000	0.19	1	1954	14	2	1	0.39	No
6331011900	Two-Family Residential	R-3000	0.16	1	1953	14	2	1	0.91	No
6330310500	Two-Family Residential	R-3000	0.16	1	1957	14	2	1	0.37	No
6270111000	Two-Family Residential	R-3000	0.19	1	1951	14	2	1	0.72	No
6330211400	Two-Family Residential	R-3000	0.15	1	1942	14	2	1	0.75	No
6331110100	Two-Family Residential	R-3000	0.16	1	1953	14	2	1	0.90	No
6271112000	Two-Family Residential	R-3000	0.17	1	1956	14	2	1	0.77	No
6271120700	Two-Family Residential	R-3000	0.17	1	1947	14	2	1	0.61	No
6330911800	Two-Family Residential	R-3000	0.15	1	1944	14	2	1	-	Yes
6330912000	Two-Family Residential	R-3000	0.15	1	1953	14	2	1	0.84	No
6330920600	Two-Family Residential	R-3000	0.15	1	1970	14	2	1	0.59	No
6330921000	Two-Family Residential	R-3000	0.15	1	1957	14	2	1	0.80	No
6330921200	Two-Family Residential	R-3000	0.15	1	1945	14	2	1	0.30	No
6330211700	Two-Family Residential	R-3000	0.15	1	1941	14	2	1	0.72	No
6330220700	Two-Family Residential	R-3000	0.15	1	1948	14	2	1	0.30	No
6330220800	Two-Family Residential	R-3000	0.15	1	1966	14	2	1	0.91	No
6330811500	Two-Family Residential	R-3000	0.15	1	1925	14	2	1	0.52	No
6330811600	Two-Family Residential	R-3000	0.15	1	1956	14	2	1	0.77	No
6330820200	Two-Family Residential	R-3000	0.22	1	1934	14	2	1	0.03	No
6330820600	Two-Family Residential	R-3000	0.15	1	1954	14	2	1	0.70	No
6330121700	Two-Family Residential	R-3000	0.15	1	1952	14	2	1	0.75	No
6271111900	Two-Family Residential	R-3000	0.17	1	1956	14	2	1	-	Yes
6271111300	Two-Family Residential	R-3000	0.16	1	1950	14	2	1	0.95	No
6264611900	Two-Family Residential	R-3000	0.17	1	1958	14	2	1	0.60	No
6264612000	Two-Family Residential	R-3000	0.17	1	1959	14	2	1	0.29	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6264612100	Two-Family Residential	R-3000	0.17	1	1952	14	2	1	0.50	No
6265001300	Two-Family Residential	R-3000	0.17	1	1953	14	2	1	0.50	No
6265410800	Two-Family Residential	R-3000	0.16	1	1956	14	2	1	0.32	No
6265310200	Two-Family Residential	R-3000	0.16	1	1954	14	2	1	0.42	No
6265320300	Two-Family Residential	R-3000	0.17	1	1950	14	2	1	0.80	No
6265220800	Two-Family Residential	R-3000	0.16	1	1953	14	2	1	0.10	No
6265210200	Two-Family Residential	R-3000	0.15	1	1960	14	2	1	0.58	No
6265210300	Two-Family Residential	R-3000	0.15	1	1955	14	2	1	0.95	No
6330110200	Two-Family Residential	R-3000	0.15	1	1959	14	2	1	0.72	No
6330212900	Two-Family Residential	R-3000	0.15	1	1948	14	2	1	0.53	No
6264700400	Two-Family Residential	R-3000	0.17	1	1956	14	2	1	0.67	No
6264701100	Two-Family Residential	R-3000	0.16	1	1961	14	2	1	0.58	No
6264810800	Two-Family Residential	R-3000	0.16	1	1958	14	2	1	0.33	No
6264820400	Two-Family Residential	R-3000	0.14	1	1946	14	2	1	0.19	No
6264911600	Two-Family Residential	R-3000	0.15	1	1975	14	2	1	0.75	No
6264920400	Two-Family Residential	R-3000	0.16	1	1956	14	2	1	0.97	No
6264920600	Two-Family Residential	R-3000	0.16	1	1955	14	2	1	0.63	No
6264922600	Two-Family Residential	R-3000	0.17	1	1970	14	2	1	0.69	No
6264922700	Two-Family Residential	R-3000	0.17	1	1962	14	2	1	0.38	No
6264210700	Two-Family Residential	R-3000	0.16	1	1951	14	2	1	0.98	No
6263310200	Two-Family Residential	R-3000	0.16	1	1957	14	2	1	0.86	No
6263310400	Two-Family Residential	R-3000	0.17	1	1953	14	2	1	0.80	No
6263310500	Two-Family Residential	R-3000	0.17	1	1953	14	2	1	0.35	No
6263312200	Two-Family Residential	R-3000	0.17	1	1970	14	2	1	0.75	No
6263310700	Two-Family Residential	R-3000	0.21	1	1956	14	2	1	0.53	No
6263310900	Two-Family Residential	R-3000	0.16	1	1942	14	2	1	0.72	No
6263312300	Two-Family Residential	R-3000	0.14	1	1942	14	2	1	0.46	No
6263221000	Two-Family Residential	R-3000	0.16	1	1956	14	2	1	0.60	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6263221300	Two-Family Residential	R-3000	0.17	1	1956	14	2	1	0.27	No
6263220200	Two-Family Residential	R-3000	0.16	1	1955	14	2	1	0.83	No
6263220400	Two-Family Residential	R-3000	0.17	1	1957	14	2	1	0.91	No
6263210400	Two-Family Residential	R-3000	0.17	1	1981	14	2	1	0.62	No
6264620500	Two-Family Residential	R-3000	0.16	1	1955	14	2	1	0.24	No
6330110700	Two-Family Residential	R-3000	0.15	1	1955	14	2	1	0.99	No
6331021000	Two-Family Residential	R-3000	0.16	1	1947	14	2	1	0.71	No
6331020400	Two-Family Residential	R-3000	0.15	1	1956	14	2	1	0.65	No
6331022300	Two-Family Residential	R-3000	0.16	1	1954	14	2	1	0.89	No
6330321700	Two-Family Residential	R-3000	0.15	1	1957	14	2	1	0.60	No
6264812200	Two-Family Residential	R-3000	0.15	1	1958	14	2	1	0.42	No
6263211900	Two-Family Residential	R-3000	0.16	1	1980	14	2	1	0.52	No
6263210900	Two-Family Residential	R-3000	0.16	1	1952	14	2	1	0.40	No
6271310900	Two-Family Residential	R-3000	0.13	1	1961	14	2	1	0.76	No
6271311700	Two-Family Residential	R-3000	0.14	1	1930	14	2	1	0.74	No
6264301000	Two-Family Residential	R-3000	0.16	1	1956	14	2	1	0.60	No
6264101000	Two-Family Residential	R-3000	0.22	1	1957	14	2	1	0.73	No
6264301300	Two-Family Residential	R-3000	0.21	1	1946	14	2	1	0.57	No
6264221700	Two-Family Residential	R-3000	0.17	1	1962	14	2	1	0.39	No
6264812100	Two-Family Residential	R-3000	0.14	1	1958	14	2	1	0.78	No
6261221400	Two-Family Detached Residential	R-3000-D	0.20	1	1957	14	2	1	0.63	No
6261220200	Two-Family Detached Residential	R-3000-D	0.18	1	1957	14	2	1	0.73	No
6261221100	Two-Family Detached Residential	R-3000-D	0.20	1	1973	14	2	1	0.78	No
6261810600	Two-Family Detached Residential	R-3000-D	0.16	1	1930	14	2	1	0.88	No
6261910800	Two-Family Detached Residential	R-3000-D	0.16	1	1956	14	2	1	0.63	No
6260323200	Two-Family Detached Residential	R-3000-D	0.20	1	1954	14	2	1	0.79	No
6260323300	Two-Family Detached Residential	R-3000-D	0.17	1	1953	14	2	1	0.62	No
6260324000	Two-Family Detached Residential	R-3000-D	0.17	1	1961	14	2	1	0.55	No

**Table C-1: Residential Recycling Sites**

APN	Zoning	General Plan	Parcel Acres	Existing Unit	Year Built	Density	Potential	Net	ILR	Vacant
6260313200	Two-Family Detached Residential	R-3000-D	0.17	1	1946	14	2	1	0.48	No
6260220200	Two-Family Detached Residential	R-3000-D	0.16	1	1958	14	2	1	0.92	No
6260221000	Two-Family Detached Residential	R-3000-D	0.15	1	1970	14	2	1	0.52	No
6261821800	Two-Family Detached Residential	R-3000-D	0.18	1	1956	14	2	1	0.82	No
6261141300	Two-Family Detached Residential	R-3000-D	0.18	1	1968	14	2	1	0.82	No
6261512000	Two-Family Detached Residential	R-3000-D	0.20	1	1948	14	2	1	0.51	No
6261413000	Two-Family Detached Residential	R-3000-D	0.22	1	1950	14	2	1	0.57	No
6261413200	Two-Family Detached Residential	R-3000-D	0.18	1	1960	14	2	1	0.45	No
6261310300	Two-Family Detached Residential	R-3000-D	0.17	1	1968	14	2	1	0.24	No
6260813900	Two-Family Detached Residential	R-3000-D	0.17	1	1957	14	2	1	0.56	No
6260812900	Two-Family Detached Residential	R-3000-D	0.14	1	1956	14	2	1	0.48	No
6260823400	Two-Family Detached Residential	R-3000-D	0.22	1	1942	14	2	1	0.60	No
6260823900	Two-Family Detached Residential	R-3000-D	0.15	1	1961	14	2	1	0.64	No
6260814600	Two-Family Detached Residential	R-3000-D	0.21	1	1935	14	2	1	0.25	No
6260823000	Two-Family Detached Residential	R-3000-D	0.17	1	1945	14	2	1	0.09	No
6261931800	Two-Family Detached Residential	R-3000-D	0.18	1	1957	14	2	1	0.67	No
6261943200	Two-Family Detached Residential	R-3000-D	0.18	1	1950	14	2	1	0.67	No
6261021800	Two-Family Detached Residential	R-3000-D	0.15	1	1954	14	2	1	0.40	No
6260704000	Two-Family Detached Residential	R-3000-D	0.17	1	1944	14	2	1	0.25	No
6260703800	Two-Family Detached Residential	R-3000-D	0.18	1	1945	14	2	1	0.70	No
6260102800	Two-Family Detached Residential	R-3000-D	0.16	1	1962	14	2	1	0.65	No
6260706500	Two-Family Detached Residential	R-3000-D	0.17	1	1975	14	2	1	0.83	No
6260103200	Two-Family Detached Residential	R-3000-D	0.26	2	1959	14	3	1	0.67	No
6260704300	Two-Family Detached Residential	R-3000-D	0.18	1	1971	14	2	1	0.38	No
6320841100	Single Family Residential	R-1-6000	0.89	1	2000	7	5	4		No
6261412100	Medium Density Residential	R-2000	0.18	0	2000	21	3	3		Yes

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6250111800	Seacoast Commercial & Mixed Use	C/MU-2	0.14	1	Commercial/Residential	1939	0.36	No	36	29	4	3		Moderate	
	6262822200	General Commercial & Mixed Use	C/MU-1	0.04	1	Restaurant	1950	0.23	No	43	34	1	0	AA	Lower	
Y	6262821900	General Commercial & Mixed Use	C/MU-1	0.16	0	Vacant Commercial	2000	-	No	43	34	5	5	AA	Lower	
Y	6262822000	General Commercial & Mixed Use	C/MU-1	0.08	0	Vacant Commercial	2000	-	No	43	34	3	3	AA	Lower	
Y	6262822100	General Commercial & Mixed Use	C/MU-1	0.09	0	Commercial Retail	1960	0.71	No	43	34	3	3	AA	Lower	
Y	6262821400	General Commercial & Mixed Use	C/MU-1	0.12	2	Duplex	1958	0.58	No	43	34	4	2	AA	Lower	
Y	6262822600	General Commercial & Mixed Use	C/MU-1	0.32	1	Car Wash	1985	0.11	No	43	34	11	10	AA	Lower	
Y	6262822500	General Commercial & Mixed Use	C/MU-1	0.24	1	Commercial Retail	1969	0.27	No	43	34	8	7	AA	Lower	
	6263021400	General Commercial & Mixed Use	C/MU-1	0.18	2	Duplex	1956	0.92	No	43	34	6	4	AB	Lower	
Y	6263020200	General Commercial & Mixed Use	C/MU-1	0.22	1	Commercial Retail	1979	1.25	No	43	34	8	7	AB	Lower	
Y	6263022000	General Commercial & Mixed Use	C/MU-1	0.21	0	Commercial Retail	2000	0.74	No	43	34	7	7	AB	Lower	
Y	6263021600	General Commercial & Mixed Use	C/MU-1	0.55	0	Service Station	1980	0.50	No	43	34	19	19	AB	Lower	Older development (existing FAR of about 0.1) in an area exhibiting interest for redevelopment and surrounded by underutilized properties
Y	6263021500	General Commercial & Mixed Use	C/MU-1	0.34	1	Commercial Retail	1975	0.49	No	43	34	12	11	AB	Lower	
	6263021300	General Commercial & Mixed Use	C/MU-1	0.18	1	Single-Family Home	1996		No	43	34	6	5	AB	Lower	
	6263022500	General Commercial & Mixed Use	C/MU-1	0.14	1	Single-Family Home	1996		No	43	34	5	4	AB	Lower	
	6263110100	General Commercial & Mixed Use	C/MU-1	0.24	1	Office/Retail	1962	0.98	No	43	34	8	7	AC	Moderate	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6263110200	General Commercial & Mixed Use	C/MU-1	0.12	1	Single-Family Home	1953	0.58	No	43	34	4	3	AC	Moderate	
	6263110400	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1957	0.14	No	43	34	5	4	AD	Moderate	
	6263110500	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1958		No	43	34	6	5	AD	Moderate	
	626311150	General Commercial & Mixed Use	C/MU-1	0.12	1	Office/Retail	1965	0.89	No	43	34	4	3	AE	Moderate	
	6263111400	General Commercial & Mixed Use	C/MU-1	0.20	1	Single-Family Home	2000		No	43	34	7	6	AE	Moderate	
	6263111000	General Commercial & Mixed Use	C/MU-1	0.15	2	Single-Family Home	1945	0.37	No	43	34	5	3	AF	Moderate	
	6263110900	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1942	0.62	No	43	34	5	4	AF	Moderate	
	6263120100	General Commercial & Mixed Use	C/MU-1	0.39	1	Restaurant	1979	0.82	No	43	34	13	12	AG	Lower	
	6263121100	General Commercial & Mixed Use	C/MU-1	0.97	0	Office/Retail	1976	0.63	No	43	34	33	33	AG	Lower	Older single-story commercial development with vacancies and large surface parking in area exhibiting trends of redevelopment
	6263121400	General Commercial & Mixed Use	C/MU-1	0.93	0		1991		No	43	34	32	32	AG	Lower	Adjoining property with 6263121100 with primary uses being auto repairs related, in area exhibiting trend of redevelopment
	6270110400	General Commercial & Mixed Use	C/MU-1	0.17	1	Office/Retail	1960	0.59	No	43	34	6	5	AH	Lower	
	6270110500	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1947	0.15	No	43	34	5	4	AH	Lower	
	6270110600	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1947	0.22	No	43	34	5	4	AH	Lower	
	6270110700	General Commercial & Mixed Use	C/MU-1	0.15	2	2-4 Units	1955	0.61	No	43	34	5	3	AH	Lower	
	6270110800	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1947	0.37	No	43	34	6	5	AH	Lower	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6270112100	General Commercial & Mixed Use	C/MU-1	0.19	1	Office/Retail		0.32	No	43	34	6	5	AH	Lower	
	6270112200	General Commercial & Mixed Use	C/MU-1	0.45	1	Service Station	1984	0.67	No	43	34	15	14	AH	Lower	
	6270121000	General Commercial & Mixed Use	C/MU-1	0.58	1	Office/Retail	1958	0.69	No	43	34	20	19	AI	Lower	1351 Palm (see pictures later in Appendix) – significantly underutilized and older development in an area exhibiting interest for redevelopment
	6270120900	General Commercial & Mixed Use	C/MU-1	0.16	0		1967		No	43	34	5	5	AI	Lower	
	6253300700	Residential Overlay	SMU/RO	0.07	1	Single-Family Home	1941	0.11	No	36	29	2	1	AK	Moderate	
Y	6253300500	Residential Overlay	SMU/RO	0.07	0	Vacant Commercial	2000	-	No	36	29	2	2	AK	Moderate	
Y	6253300600	Residential Overlay	SMU/RO	0.07	0	Vacant Commercial	2000	-	No	36	29	2	2	AK	Moderate	
	6253401700	Residential Overlay	SMU/RO	0.11	2	2-4 Units	1925	0.35	No	36	29	3	1	AL	Moderate	
Y	6253400300	Residential Overlay	SMU/RO	0.10	0	Vacant Commercial	2000	-	No	36	29	3	3	AL	Moderate	
	6253801100	Seacoast Commercial & Mixed Use	C/MU-2	0.07	1	Single-Family Home	1944	0.89	No	36	29	2	1	AM	Moderate	
	6253801200	Seacoast Commercial & Mixed Use	C/MU-2	0.06	0		2000		No	36	29	2	2	AM	Moderate	
	6253530200	Seacoast Commercial & Mixed Use	C/MU-2	0.11	1	Single-Family Home	1951	0.26	No	36	29	3	2	AN	Lower	
	6253530100	Seacoast Commercial & Mixed Use	C/MU-2	0.11	2	Duplex	1947	0.19	No	36	29	3	1	AN	Lower	
	6265420100	Neighborhood Commercial & Mixed Use	C/MU-3	0.16	2	2-4 Units	1956	0.47	No	36	29	5	3	AN	Lower	
	6265420200	Neighborhood Commercial & Mixed Use	C/MU-3	0.16	0		2000		No	36	29	5	5	AN	Lower	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6330222400	Neighborhood Commercial & Mixed Use	C/MU-3	0.13	2	2-4 Units	1964	0.56	No	36	29	4	2	AO	Moderate	
	6330222500	Neighborhood Commercial & Mixed Use	C/MU-3	0.13	1	Single-Family Home	1947	0.61	No	36	29	4	3	AO	Moderate	
	6272201100	Neighborhood Commercial & Mixed Use	C/MU-3	0.29	0	Service Station	1970	0.88	No	36	29	8	8	AP	Lower	
	6272200100	Neighborhood Commercial & Mixed Use	C/MU-3	0.19	0		2000		No	36	29	6	6	AP	Lower	Owner expressed interest in redevelopment
	6272200200	Neighborhood Commercial & Mixed Use	C/MU-3	0.16	1	Single-Family Home	1992		No	36	29	5	4	AP	Lower	Owner expressed interest in redevelopment
	6272200900	Neighborhood Commercial & Mixed Use	C/MU-3	0.16	0		2000		No	36	29	5	5	AP	Lower	
Y	6330311900	Neighborhood Commercial & Mixed Use	C/MU-3	0.15	0	Commercial Retail	2000	1.14	No	36	29	4	4	AQ	Lower	
Y	6330312000	Neighborhood Commercial & Mixed Use	C/MU-3	0.30	2	Commercial Retail	2000	2.00	No	36	29	9	7	AQ	Lower	
	6330312100	Neighborhood Commercial & Mixed Use	C/MU-3	0.15	0		2000		No	36	29	4	4	AQ	Lower	
	6250140700	Seacoast Commercial & Mixed Use	C/MU-2	0.25	1	Office/Retail	1944	0.81	No	36	29	7	6	B	Moderate	
Y	6250140500	Seacoast Commercial & Mixed Use	C/MU-2	0.23	5	Commercial Retail	2000	0.50	No	36	29	7	2	B	Moderate	
Y	6250140600	Seacoast Commercial & Mixed Use	C/MU-2	0.12	0	Vacant Commercial	2000	-	No	36	29	3	3	B	Moderate	
	6250141000	Seacoast Commercial & Mixed Use	C/MU-2	0.11	1	Office/Retail	1958	0.76	No	36	29	3	2	C	Moderate	
Y	6250230100	Seacoast Commercial & Mixed Use	C/MU-2	0.13	0	Vacant Commercial	2000	-	No	36	29	4	4	C	Moderate	
Y	6252011000	Seacoast Commercial & Mixed Use	C/MU-2	0.11	0	Vacant Commercial	2000	-	No	36	29	3	3	C	Moderate	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6250230600	Seacoast Commercial & Mixed Use	C/MU-2	0.11	1	Office/Retail	1962	0.16	No	36	29	3	2	D	Moderate	Owner expressed interest in redevelopment
	6250230500	Seacoast Commercial & Mixed Use	C/MU-2	0.13	1	Single-Family Home	1954		No	36	29	4	3	D	Moderate	Owner expressed interest in redevelopment
	6250241300	Seacoast Commercial & Mixed Use	C/MU-2	0.25	1	Office/Retail	1925	0.77	No	36	29	7	6	E	Lower	
	6250241200	Seacoast Commercial & Mixed Use	C/MU-2	0.17	1	Office/Retail	1948	0.30	No	36	29	5	4	E	Lower	
	6250240900	Seacoast Commercial & Mixed Use	C/MU-2	0.10	0		2000		No	36	29	3	3	E	Lower	Owner expressed interest in redevelopment
	6250241100	Seacoast Commercial & Mixed Use	C/MU-2	0.19	0		2000		No	36	29	6	6	E	Lower	Owner expressed interest in redevelopment
	6250241000	Seacoast Commercial & Mixed Use	C/MU-2	0.10	0		2000		No	36	29	3	3	E	Lower	Owner expressed interest in redevelopment
	6251402100	General Commercial & Mixed Use	C/MU-1	1.99	1	Single-Family Home	2000		No	43	34	68	67	F	Lower	Owner expressed interest in redevelopment
	6251401400	General Commercial & Mixed Use	C/MU-1	0.77	1	Single-Family Home	1964		No	43	34	26	25	F	Lower	Owner expressed interest in redevelopment
	6260705900	General Commercial & Mixed Use	C/MU-1	0.03	1	Office/Retail	1964	0.35	No	43	34	1	0	G	Moderate	
Y	6260705800	General Commercial & Mixed Use	C/MU-1	0.22	1	Commercial Retail	1959	0.30	No	43	34	7	6	G	Moderate	
Y	6262011100	General Commercial & Mixed Use	C/MU-1	0.15	1	Bar	2000	1.48	No	43	34	5	4	H	Moderate	
	6262011200	General Commercial & Mixed Use	C/MU-1	0.34	1	Single-Family Home	1989		No	43	34	12	11	H	Moderate	Underutilized property
	6262010500	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1941	0.51	No	43	34	5	4	I	Lower	
Y	6262010600	General Commercial & Mixed Use	C/MU-1	0.35	0	Commercial Retail	2000	1.14	No	43	34	12	12	I	Lower	
Y	6262021600	General Commercial & Mixed Use	C/MU-1	0.16	1	Single Family Home	1957	0.66	No	43	34	6	5	J	Moderate	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
Y	6262021500	General Commercial & Mixed Use	C/MU-1	0.14	1	Single Family Home	1947	0.12	No	43	34	5	4	J	Moderate	
	6262122200	General Commercial & Mixed Use	C/MU-1	0.16	2	2-4 Units		0.29	No	43	34	6	4	K	Lower	
	6262122400	General Commercial & Mixed Use	C/MU-1	0.35	1	Auto Sales	1961	0.48	No	43	34	12	11	K	Lower	
	6262123500	General Commercial & Mixed Use	C/MU-1	0.27	1	Auto Sales	1954	0.36	No	43	34	9	8	K	Lower	
Y	6262821500	General Commercial & Mixed Use	C/MU-1	0.08	1	Commercial Retail	1958	0.76	No	43	34	3	2	K	Lower	
	6262122300	General Commercial & Mixed Use	C/MU-1	0.17	2	Duplex	1957		No	43	34	6	4	K	Lower	
	6262123200	General Commercial & Mixed Use	C/MU-1	0.12	0		2000		No	43	34	4	4	K	Lower	
Y	6261700800	General Commercial & Mixed Use	C/MU-1	0.16	1	Single-Family Home	1945	0.47	No	43	34	5	4	L	Lower	
Y	6261700500	General Commercial & Mixed Use	C/MU-1	0.13	0	Commercial Retail	2000	0.39	No	43	34	5	5	L	Lower	
Y	6261700600	General Commercial & Mixed Use	C/MU-1	0.12	0	Commercial Retail	1954	0.30	No	43	34	4	4	L	Lower	
Y	6261700700	General Commercial & Mixed Use	C/MU-1	0.13	2	Duplex	1953	0.28	No	43	34	4	2	L	Lower	
Y	6262301000	General Commercial & Mixed Use	C/MU-1	0.21	3	2-4 Units	1968	0.92	No	43	34	7	4	M	Lower	
Y	6262301100	General Commercial & Mixed Use	C/MU-1	0.26	2	2-4 Units	2000	0.81	No	43	34	9	7	M	Lower	
Y	6262301200	General Commercial & Mixed Use	C/MU-1	0.25	2	Duplex	1948	0.26	No	43	34	9	7	M	Lower	
Y	6262301300	General Commercial & Mixed Use	C/MU-1	0.51	0	Vacant Residential	2000	-	No	43	34	17	17	M	Lower	
Y	6262300500	General Commercial & Mixed Use	C/MU-1	0.37	1	Restaurant - Independent	1972	0.57	No	43	34	13	12	M	Lower	
	6262412100	General Commercial & Mixed Use	C/MU-1	0.12	1	Single-Family Home	1946	0.37	No	43	34	4	3	N	Lower	
	6263012300	General Commercial & Mixed Use	C/MU-1	0.27	1	Office/Retail	1953	0.13	No	43	34	9	8	N	Lower	
	6262414100	General Commercial & Mixed Use	C/MU-1	0.61	0	Church			No	43	34	21	21	N	Lower	Underutilized church site; likely to redevelop

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6262413200	General Commercial & Mixed Use	C/MU-1	0.22	1	Single-Family Home	1946	0.79	No	43	34	8	7	O	Moderate	
	6262413300	General Commercial & Mixed Use	C/MU-1	0.17	1	Single-Family Home	1946	0.58	No	43	34	6	5	O	Moderate	
	6262411900	General Commercial & Mixed Use	C/MU-1	0.06	1	Office/Retail	1946	0.71	No	43	34	2	1	P	Moderate	
	6262413600	General Commercial & Mixed Use	C/MU-1	0.17	4	2-4 Units	1949	0.90	No	43	34	6	2	P	Moderate	
	6262412800	General Commercial & Mixed Use	C/MU-1	0.14	1	Single-Family Home	2000		No	43	34	5	4	P	Moderate	
	6262421900	General Commercial & Mixed Use	C/MU-1	0.17	1	Single-Family Home	1947	0.50	No	43	34	6	5	Q	Lower	
	6262422000	General Commercial & Mixed Use	C/MU-1	0.17	4	2-4 Units	1948	0.86	No	43	34	6	2	Q	Lower	
	6262422200	General Commercial & Mixed Use	C/MU-1	0.17	1	Single-Family Home	1949	0.77	No	43	34	6	5	Q	Lower	
	6262422100	General Commercial & Mixed Use	C/MU-1	0.17	2	Duplex	2000		No	43	34	6	4	Q	Lower	
Y	6262421000	General Commercial & Mixed Use	C/MU-1	0.37	0	Vacant		-	No	43	34	13	13	R	Lower	
	6262421100	General Commercial & Mixed Use	C/MU-1	0.32	0				No	43	34	11	11	R	Lower	
Y	6251810400	Residential Overlay	SMU/RO	0.07	0	Vacant Commercial	2000	-	No	36	29	2	2	S	Moderate	
Y	6251810500	Residential Overlay	SMU/RO	0.07	0	Vacant Commercial	2000	-	No	36	29	2	2	S	Moderate	
	6251912300	Seacoast Commercial & Mixed Use	C/MU-2	0.10	0		2000		No	36	29	3	3	T	Moderate	Owner expressed interest in redevelopment
	6251912400	Seacoast Commercial & Mixed Use	C/MU-2	0.10	0		2000		No	36	29	3	3	T	Moderate	Owner expressed interest in redevelopment
	6251912200	Seacoast Commercial & Mixed Use	C/MU-2	0.12	0		2000		No	36	29	3	3	T	Moderate	Owner expressed interest in redevelopment
Y	6252012500	Seacoast Commercial & Mixed Use	C/MU-2	0.12	1	Commercial Retail	1987	0.55	No	36	29	4	3	U	Moderate	
Y	6252010200	Seacoast Commercial & Mixed Use	C/MU-2	0.11	0		2000		No	36	29	3	3	U	Moderate	Owner expressed interest in redevelopment

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6252010600	Seacoast Commercial & Mixed Use	C/MU-2	0.12	1	Office/Retail	1934	0.38	No	36	29	3	2	V	Lower	
Y	6252011100	Seacoast Commercial & Mixed Use	C/MU-2	0.24	0	Restaurant - Independent	1966	0.45	No	36	29	7	7	V	Lower	
Y	6252010900	Seacoast Commercial & Mixed Use	C/MU-2	0.13	0	Vacant Commercial	2000	-	No	36	29	4	4	V	Lower	
Y	6252010800	Seacoast Commercial & Mixed Use	C/MU-2	0.11	0	Vacant Commercial	2000	-	No	36	29	3	3	V	Lower	
Y	6252010700	Seacoast Commercial & Mixed Use	C/MU-2	0.13	0	Vacant Commercial	2000	-	No	36	29	4	4	V	Lower	
	6252010500	Seacoast Commercial & Mixed Use	C/MU-2	0.13	1	Single-Family Home	2000		No	36	29	4	3	V	Lower	Owner expressed interest in redevelopment
	6262501000	General Commercial & Mixed Use	C/MU-1	0.31	1	Convalescent Home	1965	0.88	No	43	34	10	9	W	Lower	
Y	6262500900	General Commercial & Mixed Use	C/MU-1	0.46	0	Medical Office	2000	1.00	No	43	34	15	15	W	Lower	Antiquated single-story medical office building probably last improved in 2000 in area exhibiting trends of redevelopment
Y	6262811600	General Commercial & Mixed Use	C/MU-1	0.26	1	Commercial Retail	1954	0.01	No	43	34	9	8	X	Moderate	
Y	6262811000	General Commercial & Mixed Use	C/MU-1	0.18	1	Single Family Home	1948	0.13	No	43	34	6	5	X	Moderate	
	6262810800	General Commercial & Mixed Use	C/MU-1	0.45	1	Misc. Commercial	1958	0.96	No	43	34	15	14	Y	Lower	Small antiques post office facility on privately owned land with significant surface parking in area exhibiting trend of redevelopment
	6262810600	General Commercial & Mixed Use	C/MU-1	0.17	2	2-4 Units	1947	0.14	No	43	34	6	4	Y	Lower	
	6262820600	General Commercial & Mixed Use	C/MU-1	0.21	1	Commercial/ Residential	1948	0.51	No	43	34	7	6	Z	Lower	
	6262820700	General Commercial & Mixed Use	C/MU-1	0.16	1	Office/Retail	1979	0.59	No	43	34	6	5	Z	Lower	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6262820800	General Commercial & Mixed Use	C/MU-1	0.16	0	Office/Retail	1959	0.83	No	43	34	6	6	Z	Lower	
Y	6262820100	General Commercial & Mixed Use	C/MU-1	0.11	1	Commercial Retail	1948	2.44	No	43	34	4	3	Z	Lower	
Y	6262820300	General Commercial & Mixed Use	C/MU-1	0.10	0	Commercial Retail	1959	0.50	No	43	34	3	3	Z	Lower	
Y	6262820200	General Commercial & Mixed Use	C/MU-1	0.09	0	Vacant Commercial	2000	-	No	43	34	3	3	Z	Lower	
Y	6262820400	General Commercial & Mixed Use	C/MU-1	0.08	0	Vacant Commercial	2000	-	No	43	34	3	3	Z	Lower	
	6262820500	General Commercial & Mixed Use	C/MU-1	0.10	0		2000		No	43	34	3	3	Z	Lower	
	6332234700	Neighborhood Commercial & Mixed Use	C/MU-3	0.19	1	Office/Retail	1984	0.43	No	36	29	6	5		Moderate	
	6253922300	Seacoast Commercial & Mixed Use	C/MU-2	0.22	1	Office/Retail	1960	0.28	No	36	29	6	5		Moderate	
	6251911700	Seacoast Commercial & Mixed Use	C/MU-2	0.12	0	Office/Retail	1955	0.87	No	36	29	3	3		Moderate	
	6270111900	General Commercial & Mixed Use	C/MU-1	0.36	1	Parking Lot	1962	0.25	No	43	34	12	11		Moderate	
	6253800500	Residential Overlay	SMU/RO	0.13	1	Single-Family Home	1940	0.23	No	36	29	4	3		Moderate	
	6332234000	Neighborhood Commercial & Mixed Use	C/MU-3	0.10	1	Single-Family Home	1962	0.43	No	36	29	3	2		Moderate	
	6253300300	Residential Overlay	SMU/RO	0.07	1	Single-Family Home	1948	0.42	No	36	29	2	1		Moderate	
	6253802200	Residential Overlay	SMU/RO	0.13	2	Duplex		0.71	No	36	29	4	2		Moderate	
	6253302100	Seacoast Commercial & Mixed Use	C/MU-2	0.10	1	Office/Retail	1926	0.25	No	36	29	3	2		Moderate	
	6251910400	Seacoast Commercial & Mixed Use	C/MU-2	0.19	1	Office/Retail	1959	0.29	No	36	29	5	4		Moderate	
	6253510100	Seacoast Commercial & Mixed Use	C/MU-2	0.11	1	Office/Retail		0.56	No	36	29	3	2		Moderate	
	6252720100	Seacoast Commercial & Mixed Use	C/MU-2	0.33	1	Office/Retail	1955	0.32	No	36	29	10	9		Moderate	
	6253302400	Residential Overlay	SMU/RO	0.14	1	Single-Family Home	1949	0.11	No	36	29	4	3		Moderate	

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
	6252541100	General Commercial & Mixed Use	C/MU-1	0.36	1	Office/Retail	1976	0.98	No	43	34	12	11		Moderate	
Y	6330222700	Neighborhood Commercial & Mixed Use	C/MU-3	0.27	1	Car Wash	1966	0.10	No	36	29	8	7		Moderate	
	6330222300	Neighborhood Commercial & Mixed Use	C/MU-3	0.26	1	Office/Retail	1960	0.88	No	36	29	7	6		Moderate	
	6262501200	General Commercial & Mixed Use	C/MU-1	0.40	1	Service Station	1966	0.50	No	43	34	14	13		Moderate	
	6262212400	General Commercial & Mixed Use	C/MU-1	0.17	2	2-4 Units	1958	0.94	No	43	34	6	4		Moderate	
	6262212000	General Commercial & Mixed Use	C/MU-1	0.49	0	Parking Lot	1960	0.14	No	43	34	16	16		Moderate	
	6262221700	General Commercial & Mixed Use	C/MU-1	0.16	2	2-4 Units	1955	0.72	No	43	34	5	3		Moderate	
	6262222500	General Commercial & Mixed Use	C/MU-1	0.21	0	Office/Retail	1957	0.88	No	43	34	7	7		Moderate	
	6261621800	General Commercial & Mixed Use	C/MU-1	0.27	3	2-4 Units	1948	0.57	No	43	34	9	6		Moderate	
	6262020100	General Commercial & Mixed Use	C/MU-1	0.16	2	2-4 Units	1955	0.90	No	43	34	6	4		Moderate	
	6260705400	General Commercial & Mixed Use	C/MU-1	0.17	1	Single-Family Home	1928	0.48	No	43	34	6	5		Moderate	
Y	6252722300	Seacoast Commercial & Mixed Use	C/MU-2	0.22	0	Vacant Commercial	2000	-	No	36	29	6	6		Moderate	
Y	6252732300	Seacoast Commercial & Mixed Use	C/MU-2	0.11	1	Single Family Home	2009	0.08	No	36	29	3	2		Moderate	
Y	6330312500	Neighborhood Commercial & Mixed Use	C/MU-3	0.15	0	Vacant Residential		-	No	36	29	4	4		Moderate	
Y	6262910500	General Commercial & Mixed Use	C/MU-1	0.17	1	Commercial Retail	2000	1.06	No	43	34	6	5		Moderate	
Y	6262500200	General Commercial & Mixed Use	C/MU-1	0.81	0	Medical Office	1961	0.82	No	43	34	27	27		Lower	701 Palm – older development with significant surface parking (see pictures) in area exhibiting redevelopment

**Table C-2: Mixed Use Sites**

In 5 <sup>th</sup> Cycle	APN	Zoning	General Plan	Parcel Acres	Extg Units	Use	Year Built	ILR	Vac	Max Density	Realistic Density	Potential	Net	Site ID	Income	Current Status
																trend of similar properties
Y	6262302000	General Commercial & Mixed Use	C/MU-1	0.73	1	Restaurant - Independent	1974	0.49	No	43	34	25	24		Lower	Older single-story strip commercial in area exhibiting trend of redevelopment
	6251811202	Residential Overlay	SMU/RO	0.13	1	Single-Family Home	1984		No	36	29	4	3		Moderate	
	6251811203	Residential Overlay	SMU/RO	0.13	1	Single-Family Home	1984		No	36	29	4	3		Moderate	
	6251811204	Residential Overlay	SMU/RO	0.13	1	Single-Family Home	1984		No	36	29	4	3		Moderate	
	6251811205	Residential Overlay	SMU/RO	0.13	1	Single-Family Home	1984		No	36	29	4	3		Moderate	
	6262110700	General Commercial & Mixed Use	C/MU-1	2.45	1	Older retail frontage	2001		No	43	34	83	82		Lower	Older retail with significant surface parking in area exhibiting redevelopment trend of similar properties
	6262212800	General Commercial & Mixed Use	C/MU-1	0.43	0	Church	2000		No	43	34	15	15		Moderate	Underutilized church site; likely to redevelop
	6262221100	General Commercial & Mixed Use	C/MU-1	0.29	0		1984		No	43	34	10	10		Moderate	Underutilized property
	6270110300	General Commercial & Mixed Use	C/MU-1	0.08	0		2000		No	43	34	3	3		Moderate	

**Figure C-1: Existing Conditions Along Mixed Use Corridors**



APN 6251912400- 123 Palm



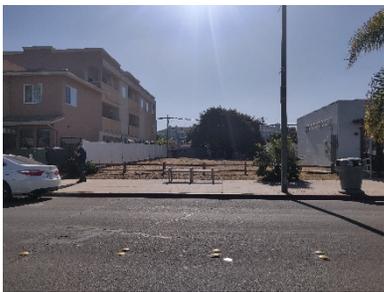
APN 6250140500- 124 Palm



APN 6250141000- 182 Palm



APN 6252012500- 201 Palm



APN 6252010200- 211 Palm



APN 6250230500- 220 Palm



APN 6250230700- 236 Palm



APN 6250230700- 245 Palm



APN 6252010700- 253 Palm



APN 6262301300- 655 Florida



APN 6262301300- 655 Florida



APN 260705800- 690 Highway 75

**Figure C-1: Existing Conditions Along Mixed Use Corridors**

 <p>APN 6260705900- 698 Highway 75</p>	 <p>APN 6262500200- 701 Palm</p>	 <p>APN 6251910400- 717 Seacoast</p>	 <p>APN 6262822600- 730 10<sup>th</sup></p>
 <p>APN 6262010600- 730 Palm</p>	 <p>APN 6262820600- 737 Emory</p>	 <p>APN 6270110400- 737-753 13<sup>th</sup></p>	 <p>APN 6262021900- 740 Palm</p>
 <p>APN 6262811600- 744 Emory</p>	 <p>APN 6251920400- 757 Seacoast</p>	 <p>APN 6252722300- 829 Seacoast</p>	 <p>APN 6262123200- 938 Palm</p>

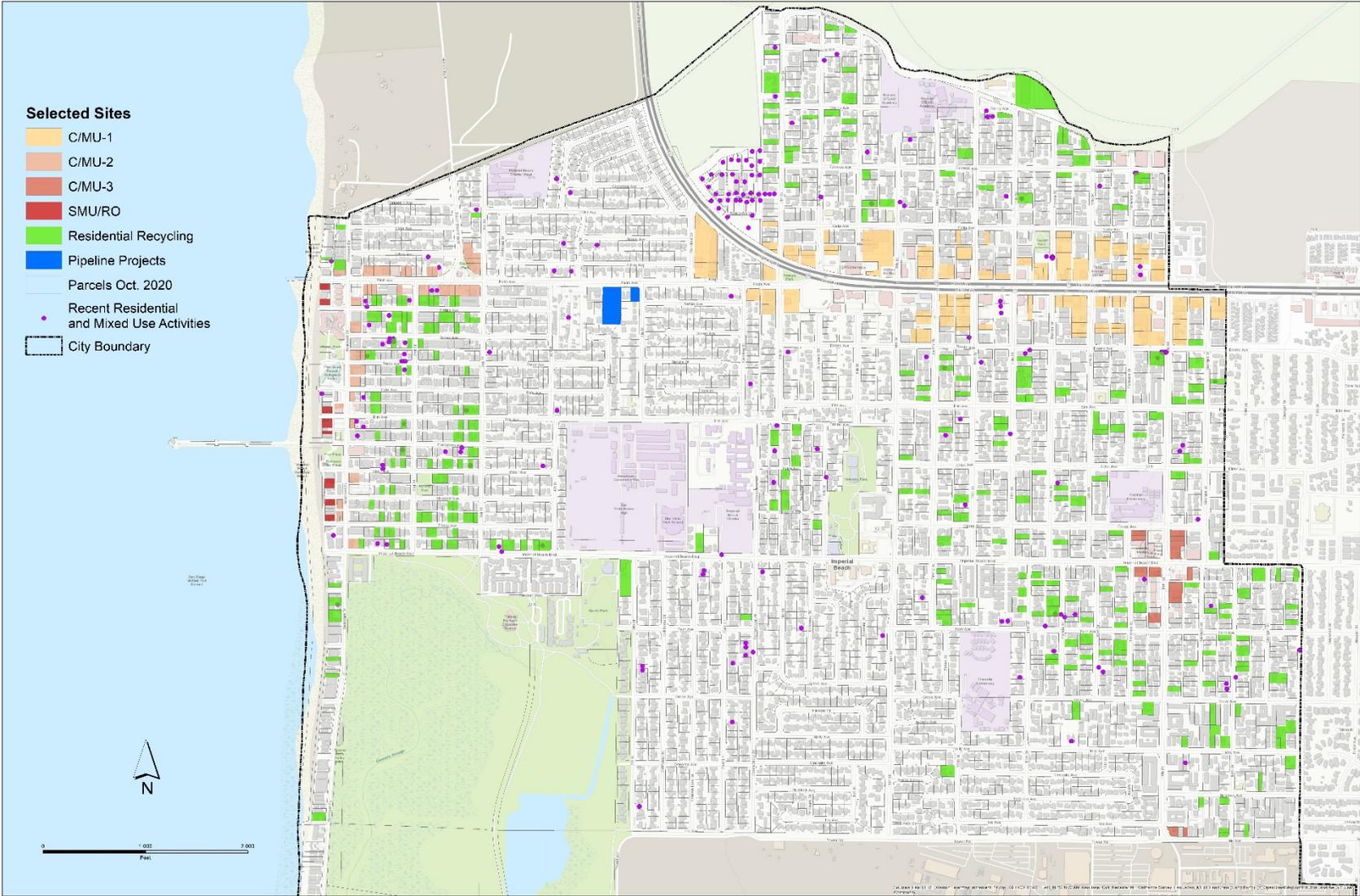
**Figure C-1: Existing Conditions Along Mixed Use Corridors**

 <p>APN 6262123500- 940 Palm</p>	 <p>APN 6253522300- 951 Seacoast</p>	 <p>APN 6253530100- 967 Seacoast</p>	 <p>APN 6262820300- 975 Palm</p>
 <p>APN 6262822100- 989 Palm</p>	 <p>APN 6262822100- 989 Palm</p>	 <p>APN 6262221100- 1002 Palm</p>	 <p>APN 6272200200- 1051 13<sup>th</sup></p>
 <p>APN 6262222500- 1058 Palm</p>	 <p>APN 6265421100- 1070 13<sup>th</sup></p>	 <p>APN 6330312000- 1133 13<sup>th</sup></p>	 <p>APN 6261700500-1144 Palm</p>

**Figure C-1: Existing Conditions Along Mixed Use Corridors**

 <p>APN 6261700500- 1144 Palm</p>	 <p>APN 6263022000- 1155 Palm</p>	 <p>APN 6263020200- 1177 Palm</p>	 <p>APN 6330313000- 1183 13<sup>th</sup></p>
 <p>APN 6330313000-1183 13<sup>th</sup></p>	 <p>APN 6262412700- 1200 Palm</p>	 <p>APN 6263110100- 1205 Palm</p>	 <p>APN 6263111400- 1231 Palm</p>
 <p>APN 6262412800- 1240 Palm</p>	 <p>APN 6270111900- 1331 Palm</p>	 <p>APN 6270121000- 1351 Palm</p>	 <p>APN 6270121000- 1351 Palm</p>

Figure C-2: Location of Sites for RHNA



# Appendix D: Fair Housing Assessment

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## D.1 Introduction and Overview of AB 686

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

## D.2 Assessment of Fair Housing Issues

### D.2.1 Fair Housing Enforcement and Outreach

San Diego County jurisdictions are served by two fair housing service providers, CSA San Diego and Legal Aid Society of San Diego (LASSD), that investigate and resolve discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. These service providers also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. Imperial Beach is served by LASSD. Walk-in services are offered at three LASSD office locations in San Diego County- Southeast, Midtown, and North County. However, these offices are located in the City of San Diego and Oceanside. For this reason, LASSD has established a Fair Housing Hotline to ensure its Fair Housing services are readily available to the community and that a resident may promptly report any act of housing discrimination that may have occurred.

Between 2014 and 2019, LASSD served 341 Imperial Beach residents. LASSD filed 22 fair housing complaints by Imperial Beach residents, accounting for about one percent of the cases filed by LASSD for the entire County. Of the 22 cases, 10 cited disability as a basis for discrimination. National origin and sex/gender were the second most common basis for discrimination. (HUD) maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. From October 1, 2014 to September 30, 2019, 414 fair housing complaints in San Diego County were filed with HUD. Less than one percent (seven cases) were filed by Imperial Beach residents). In the County and City of Imperial beach, disability-related discrimination was the most commonly reported—comprising 53 percent of all cases in the County and 78 percent of Imperial Beach cases.

The 2020 Regional Analysis of Fair Housing Choice (2020 Regional AI) found that enforcement services were inadequate in the region. The 2020 Regional AI cited that between 2014-2020, only one site in Imperial Beach was tested for discrimination based on national origin and this site tested positive for differential treatment. The City will work with the County Housing and

Community Development (County HCD) as the lead for Urban County CDBG program, to ensure increased fair housing outreach, education, and enforcement activities take place in Imperial Beach.

The 2020 Regional AI found that outreach services were also inadequate in the region as residents may find it hard to navigate the service system and identify the appropriate agency to contact. The City of Imperial Beach advertises fair housing services through placement of a fair housing services brochure at public counters, local library and will include a link to LASSD in its website (Program 14). To increase outreach, the City will include a link to the LASSD website and update outreach materials frequently. The City will advocate the County to include systematic testing in its Fair Housing Program (Program 14). In addition, the City has recently hired a Housing Programs Specialist whose responsibilities will include Fair Housing Program outreach.

## **D.2.2 Integration and Segregation**

### ***Race and Ethnicity***

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) convened in the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table D-1 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

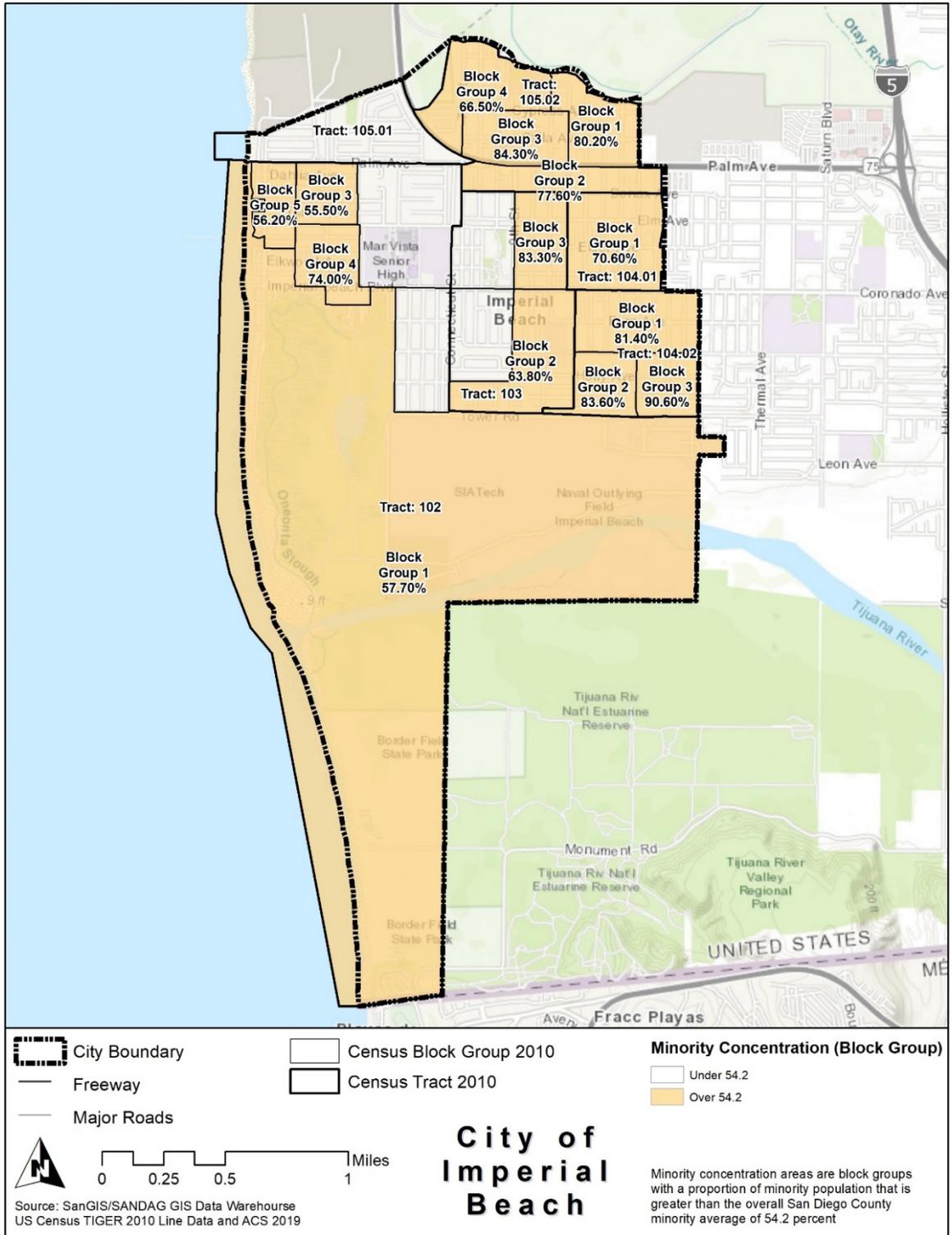
- Poverty: Tracts with at least 30 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

According to the California Fair Housing Task Force’s 2021 opportunity maps, there are no census tracts or areas of high racial segregation and poverty in Imperial Beach. Regionally, areas with high segregation and poverty are located in the Southern County, specifically in Chula Vista, National City, and the City of San Diego.

Table D-1: Domains and List of Indicators for Opportunity Maps	
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020	

While the 2021 HCD/TCAC map combined both poverty and patterns of minority concentrations where census tracts that have both a poverty rate of over 30 percent and that are designated as being racially segregated were filtered into the “High Segregation & Poverty” category, the 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 Regional AI) defined minority concentrations as a census block group with a proportion of minority households that is greater than the overall San Diego County minority average of 54.2 percent. Figure D-1 shows that the highest concentration of minorities in Imperial Beach is found in the eastern parts of the City. Census block groups on the western side of the City also exceed the County minority concentration average of 54.2 percent it but to a lesser extent than the eastern block groups, where the minority population is upwards of 90 percent. An important note on the mapping of racial/ethnic concentrations is that concentration is defined by the proportion of a racial/ethnic group in the total population of a census block group. If a census block group has a low population, the proportion of a racial/ethnic group may appear high. This is not the case for the City’s census block groups as the block groups that were classified as having a minority concentration had the highest population in the City. In fact, four of the five block groups that were not classified as minority concentration areas had a population smaller than 1,000. Regionally, minority concentration areas were prevalent in the Southern region, reflecting proximity to the U.S.-Mexico border.

Figure D-1: Areas of Minority Concentration in Imperial Beach (2018)



## ***Persons with Disabilities***

According to the 2020 Regional AI, housing choices for special needs groups, especially persons with disabilities, are limited in the region. In San Diego County, about 10 percent of the population has a disability. Imperial Beach has the second highest proportion of population with a disability in the county (12 percent), only lower than its neighboring city of Chula Vista (13 percent). The 2021 County Health Rankings in Figure D-2 show that in the South County region, Imperial Beach, Chula Vista, National City, and San Diego have the highest concentration of persons with disabilities, with the population with a disability ranging between 10 and 20 percent per tract. The City of San Diego and National City have some tracts where the population with disability exceeds 20 percent. Within Imperial Beach, there is no concentration of persons with disabilities as all tracts within the City have a population with a disability ranging from 10 to 20 percent (Figure D-3).

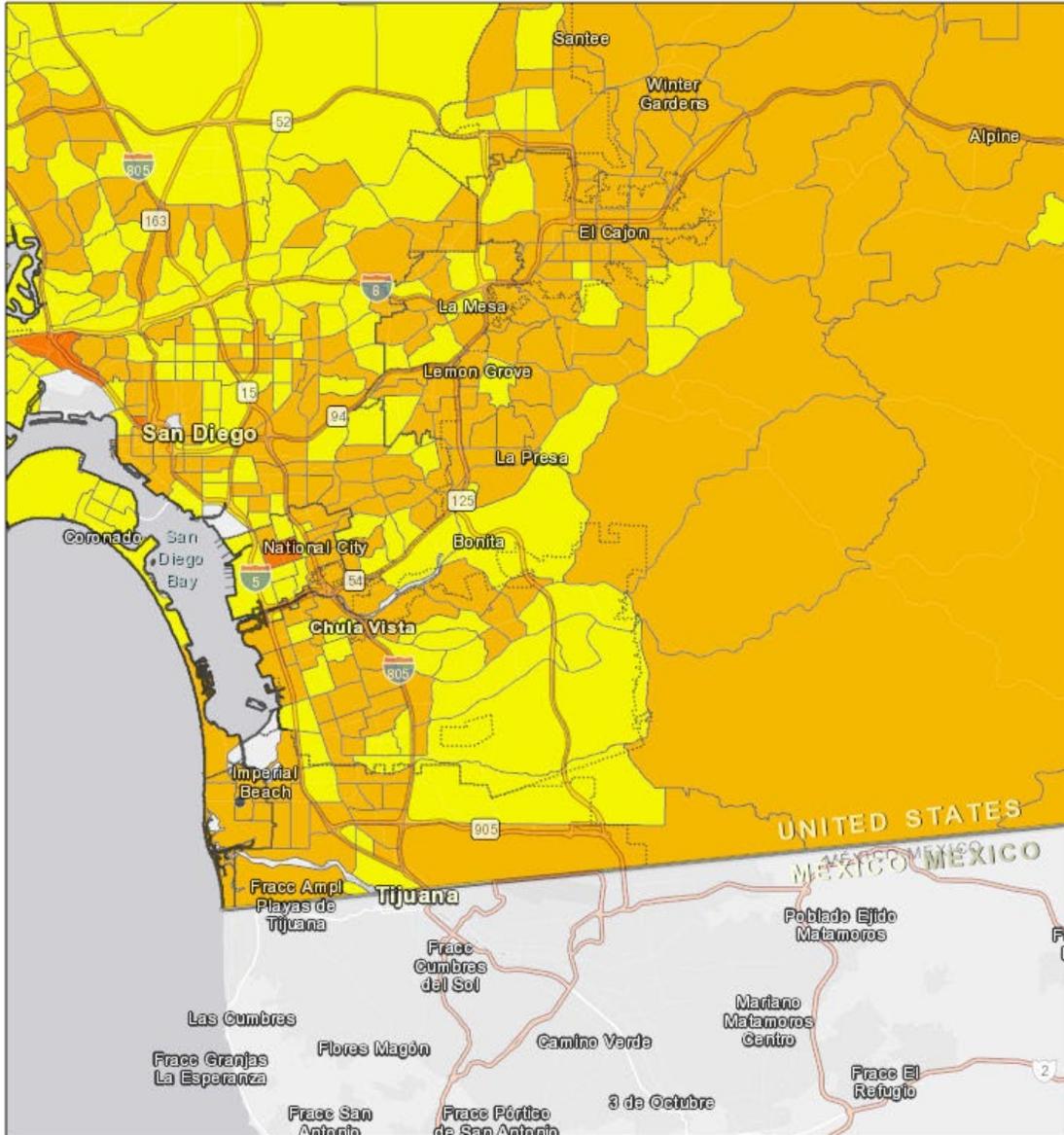
## ***Familial Status***

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. According to the HCD AB686/AFFH data tool maps (Figure D-4), there is no concentration of households with adults living alone in the City. Adults living with their spouse are concentrated in northern tracts of the City, where the population of adults living with their spouse is 40 to 60 percent, compared to the 20 to 40 percent in other tracts in the City (Figure D-5).

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law. As shown in Table H-7, 35 percent of Imperial Beach households are families with children. The City's share of families with children is lower than the neighboring cities of Chula Vista (45 percent), National City (40 percent), but higher than the City of San Diego (29 percent) and the County overall (33 percent). According to the HCD AFFH map in Figure D-6, children in married households are most concentrated in a tract in the northern and southern tracts of the City. The percent of households with children in these tract ranges between 60 and 80 percent (probably due to the housing types available), higher than the other tracts where this percentage ranges from 20 to 40 percent.

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. In Imperial Beach, female-headed households are concentrated in a tract in the northern area of the City, near Palm Avenue (Figure D-7). This tract has between 40 to 60 percent of children living in female-headed households, compared to 20 to 4 percent in other tracts in the City.

Figure D-2: Percent Population with Disabilities in the South County Region



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Jurisdiction Boundaries

City

County

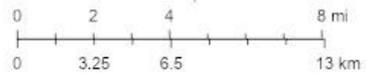
Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

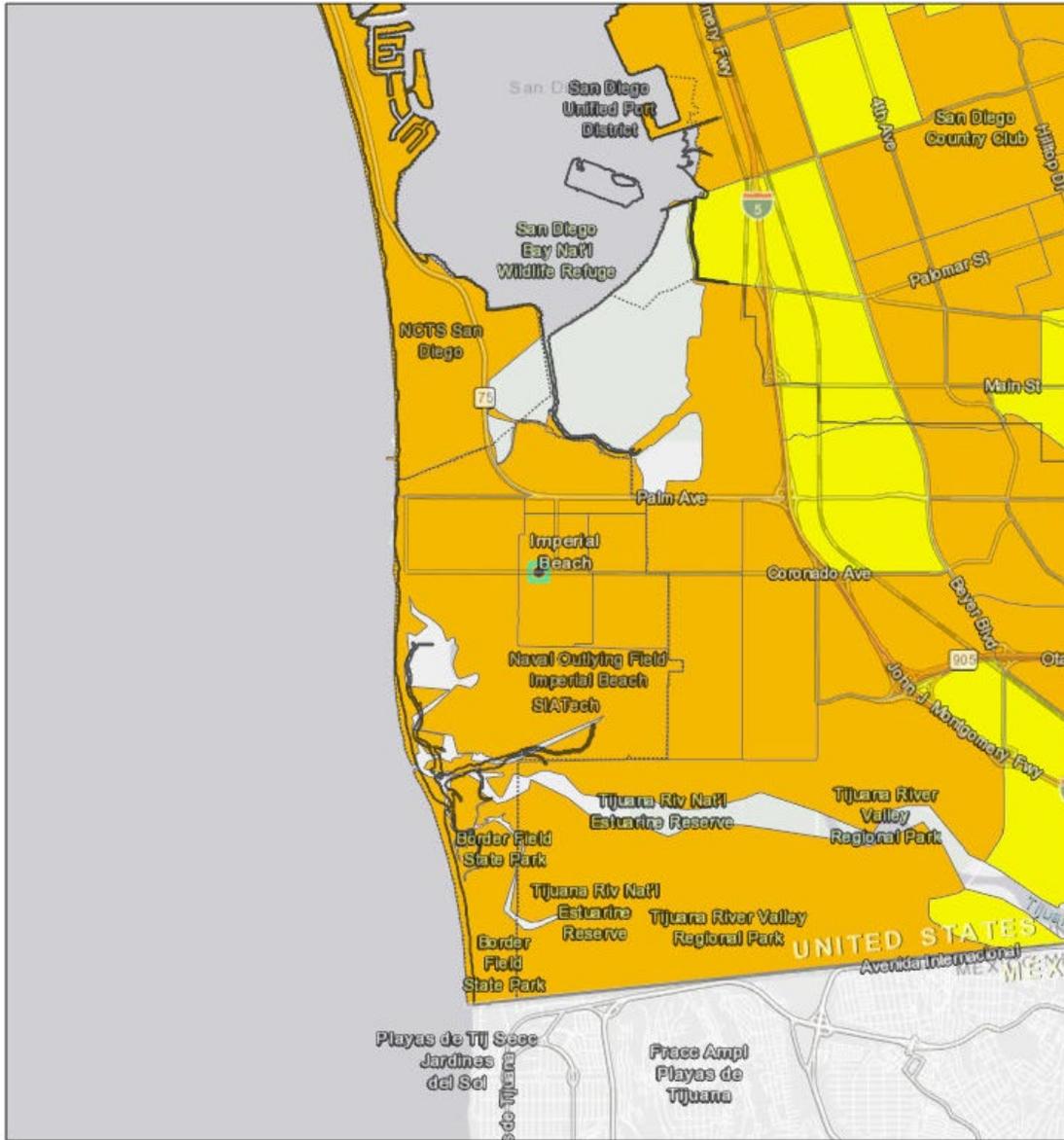
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CA HCD  
Esri, HERE, NPS | PlaceWorks 2021, County Health Rankings 2021 | OEHHA, CalEPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Figure D-3: Percent Population with Disabilities in Imperial Beach



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Jurisdiction Boundaries

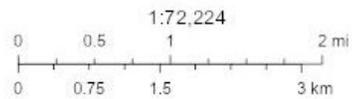
City

County

Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

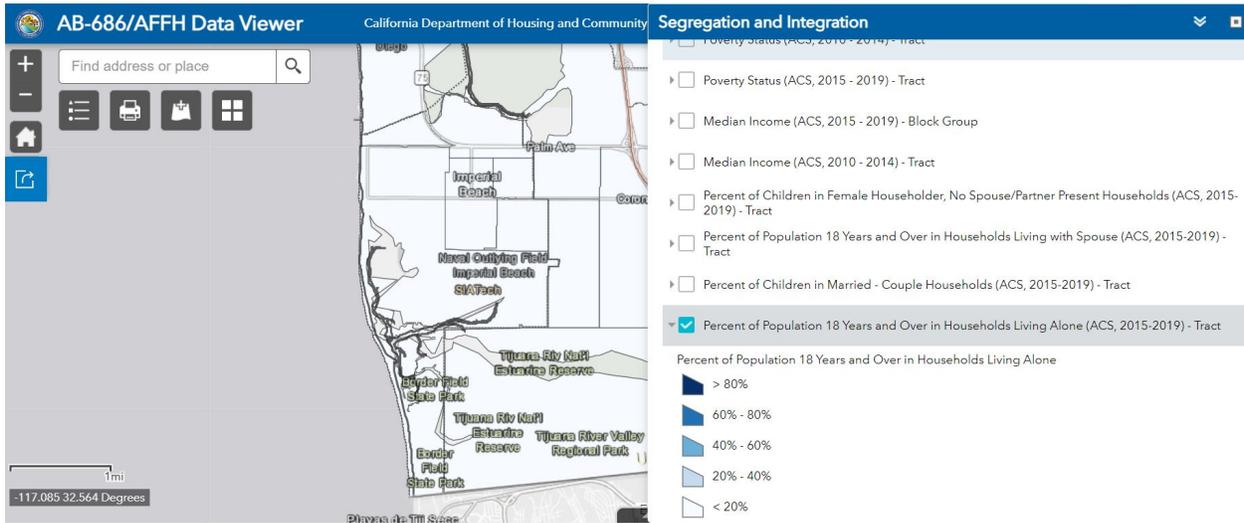
10% - 20%



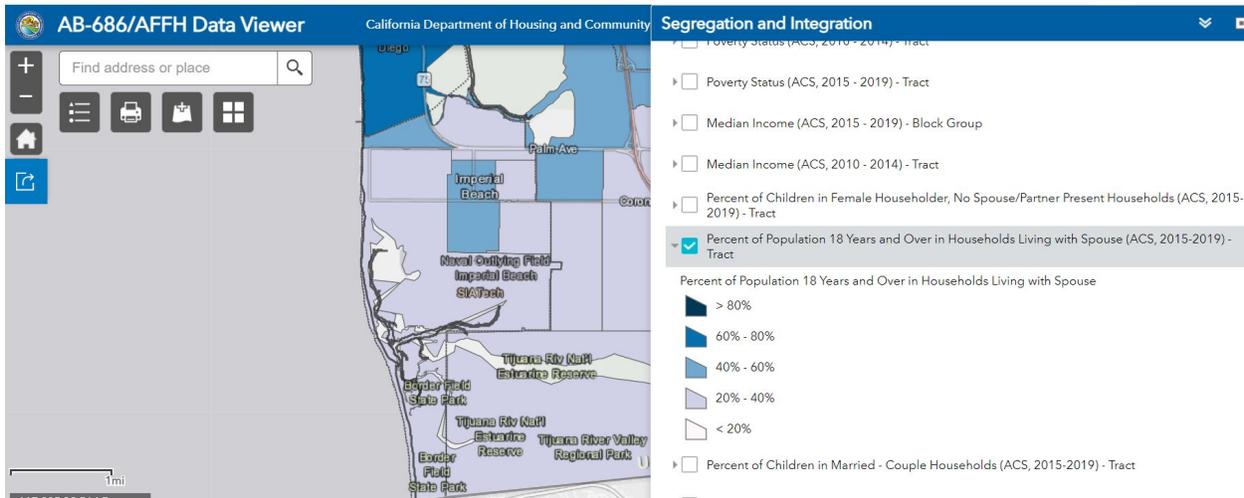
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CA HCD  
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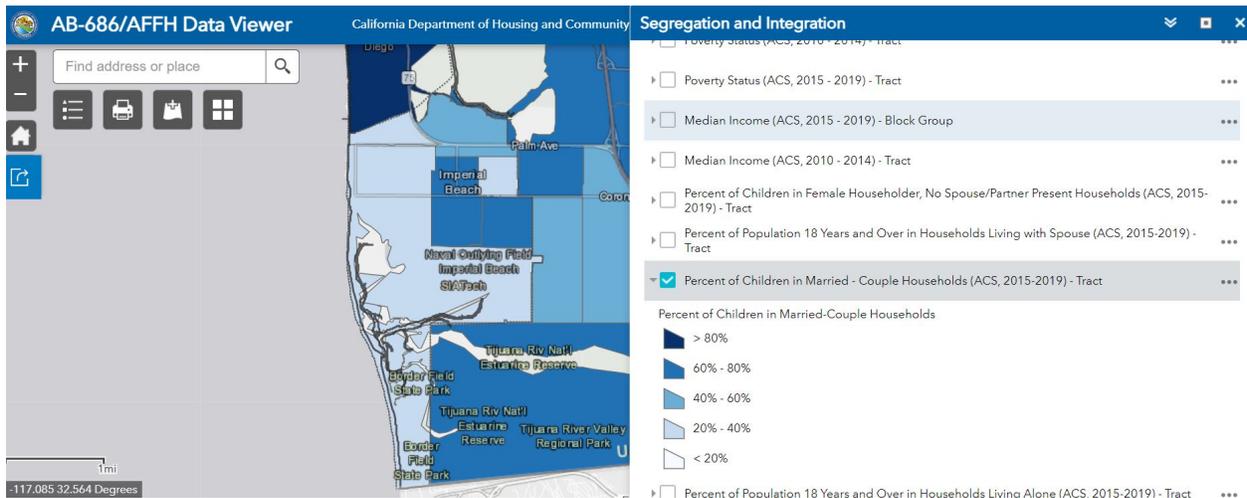
**Figure D-4: Percent Population of Adults Living Alone – Imperial Beach**



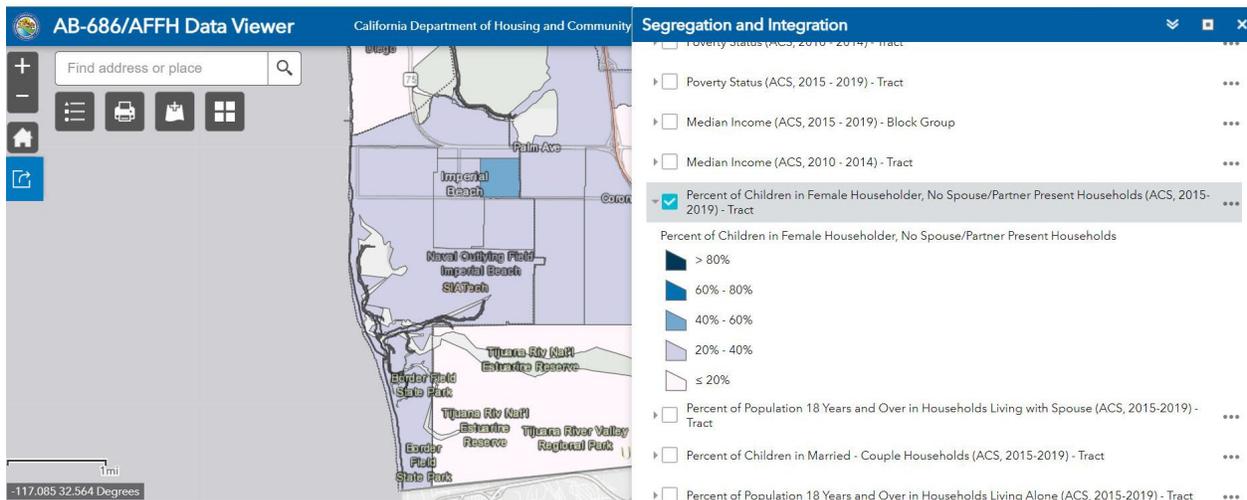
**Figure D-5: Percent Population of Adults Living with their Spouse - Imperial Beach**



**Figure D-6: Percent of Children in Married Couple Households - Imperial Beach**



**Figure D-7: Percent of Children in Single Female-Headed Households- Imperial Beach**



## ***Income Level***

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure D-8 shows the Lower and Moderate Income (LMI) areas in the County by Census block group. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). LMI areas are concentrated in three very general areas in the County. In the North County area, LMI areas are seen at Camp Pendleton and in the cities of Oceanside, Vista, San Marcos, and Escondido, in a pattern generally following State Route 78. In the southern portion of the County, cluster of LMI areas are seen in the central and southern areas of the City of San Diego and continuing down to the U.S./Mexico border, including the City of Imperial Beach. While most of the City of Imperial Beach is considered LMI, the highest concentration of LMI population is located in tracts north and south of Palm Avenue.

### **D.2.3 Racially and Ethnically Concentrated Areas**

#### ***Racially/Ethnically Concentrated Areas of Poverty***

In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. In San Diego County, there are RECAPs scattered in small sections of Escondido, El Cajon, La Mesa, Lemon Grove, National City, and Chula Vista (Figure D-10). Larger RECAP clusters can be seen in the central/southern portion of the City of San Diego. There are no RECAPs in Imperial Beach. However, as shown in the minority concentration map in Figure D-1 and LMI map in Figure D-8, tracts with the highest minority populations are located in the northeastern side of the City (where minority concentration exceeds 80 percent) and LMI tracts are also concentrated in this same region.

Figure D-8: Low and Moderate Income (LMI) areas in San Diego County

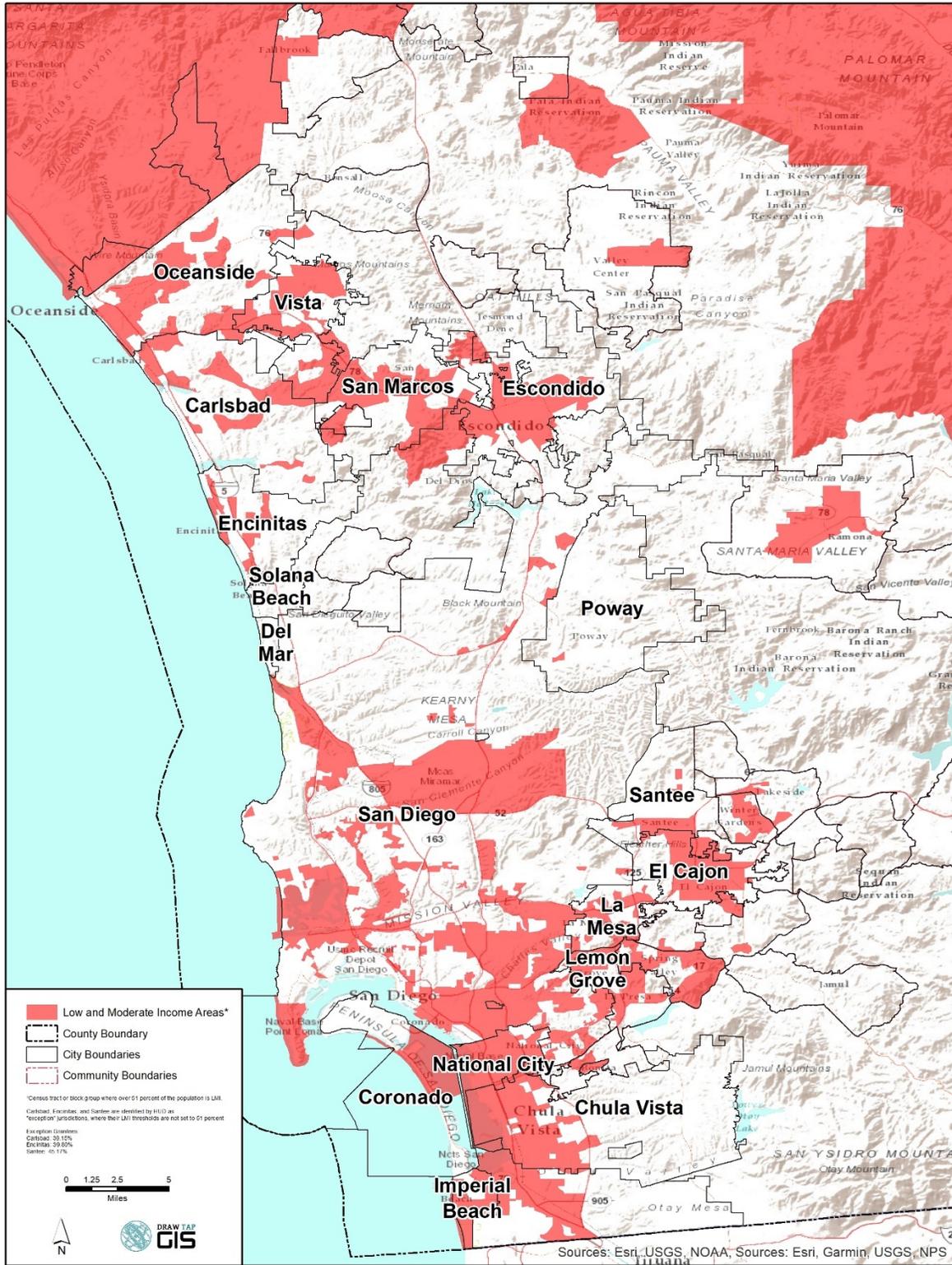
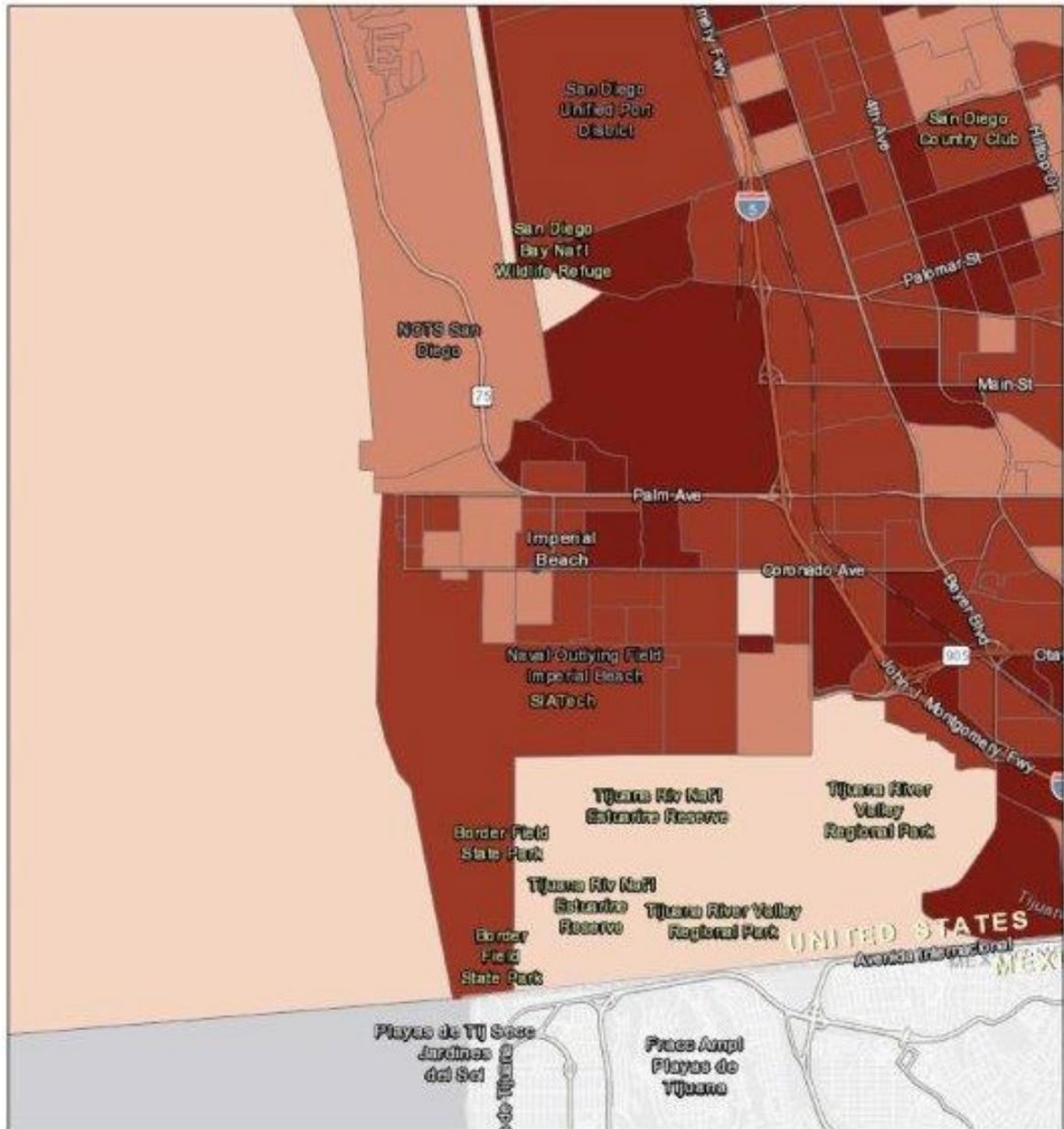
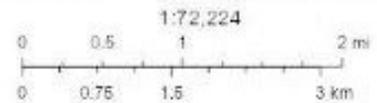
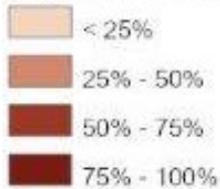


Figure D-9: Low and Moderate Income (LMI) Areas in Imperial Beach



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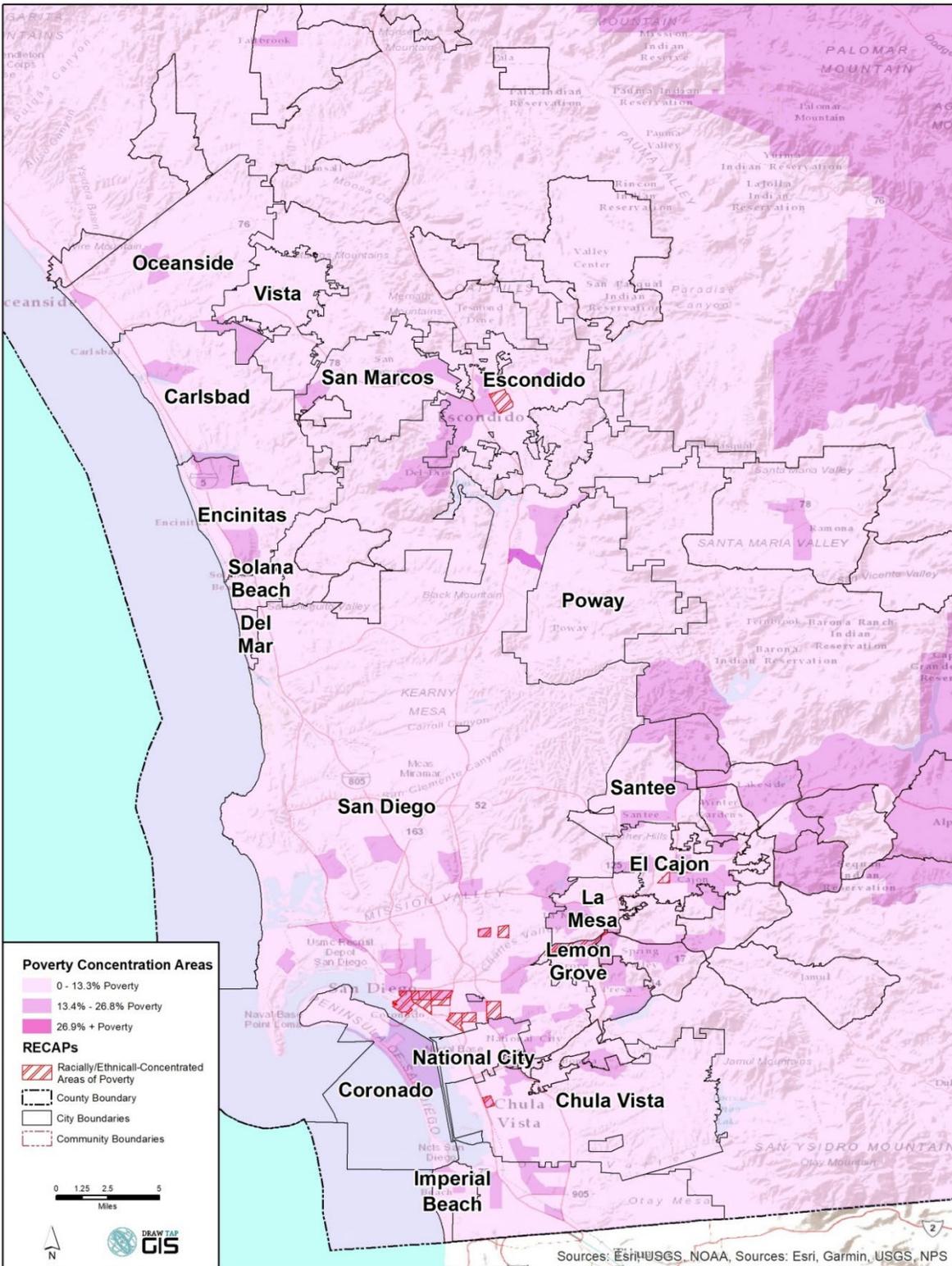
Low to Moderate Income Population (HUD) - Block Group



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CA HCD  
 Esri, HERE, DeLorme, University of Richmond's Digital Scholarship Lab | PlaceWorks 2021, County Health Rankings 2021 | CEHHA, CalEPA | PlaceWorks 2021, HUD 2019 | PlaceWorks

Figure D-10: Racially Concentrated Areas of Poverty (RECAPs) in San Diego County



## Racially Concentrated Areas of Affluence

While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAA is defined as affluent, White communities.<sup>13</sup> According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.”

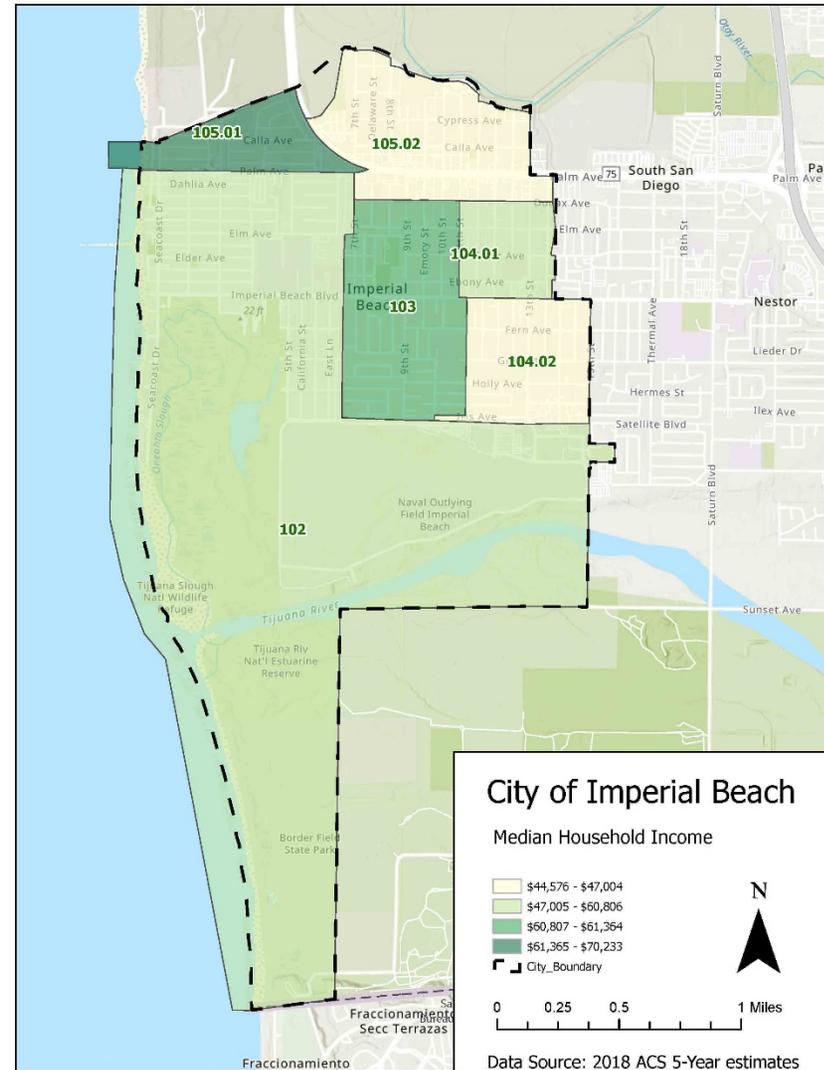
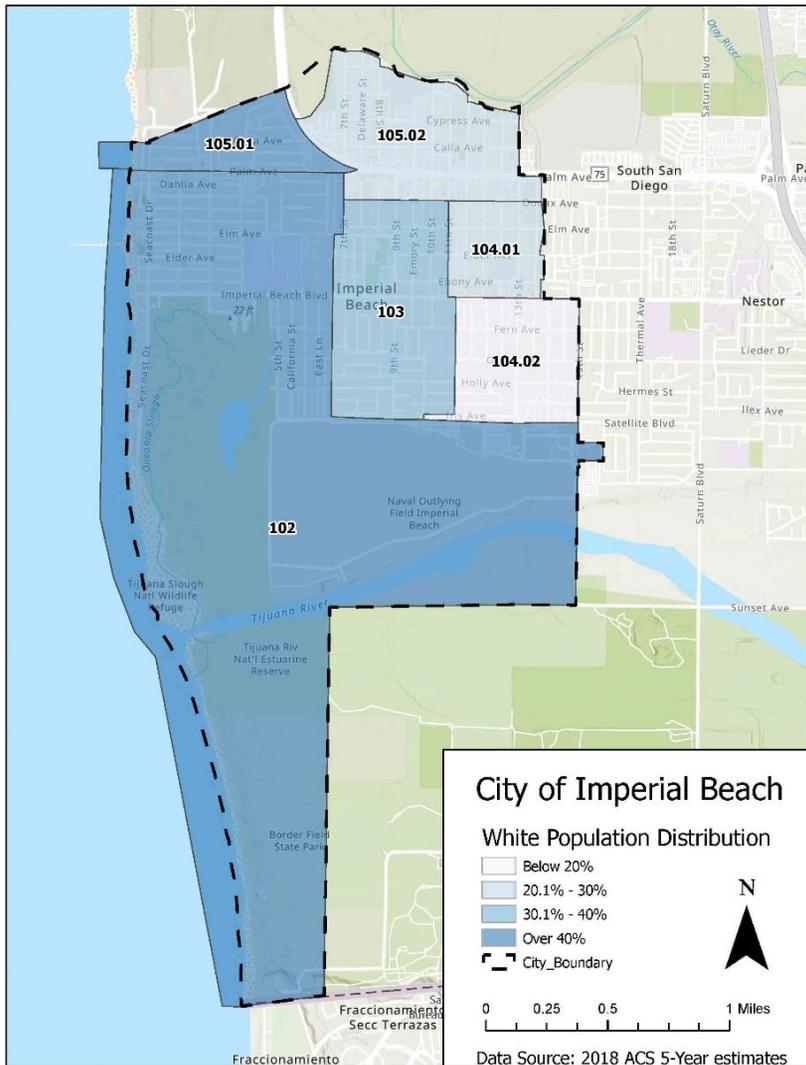
RCAAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percent White population and median household income as proxies to identify potential areas of affluence. As Figure D-11 shows, census tracts with a large white population (over 40 percent) and highest median income (\$61,365 -\$70,233) are located in the western side of the City along the coast. Particularly, census tract 105.1 in the northernmost part of the City (adjacent to Coronado) has high concentration of Whites and high median income. This is expected as the surrounding city of Coronado has highest median income in the Southern County (\$101,520, compared to \$51,838 in Imperial Beach, \$76,354 in Chula Vista, and \$46,032 in National City) and higher than the county overall (\$74,855). As Table D-2 shows, White households also tend to have higher median incomes than all the population. In Imperial Beach, White households earn over \$13,000 more than all households. Also, Coronado has the highest concentration of white population in the County (74 percent, compared to 31 percent in Imperial beach and 46 percent in the County).

	<b>Imperial Beach</b>	<b>Coronado</b>	<b>Chula Vista</b>	<b>National City</b>	<b>San Diego County</b>
<b>Median HH Income</b>					
All Households	\$51,838	\$101,520	\$76,354	\$46,032	\$74,855
White alone	\$65,031	\$104,757	\$83,204	\$53,182	\$84,785
<b>White Population</b>	31%	74%	18%	10%	46%

Source: 2018 American Community Survey, 5-year estimates.

<sup>13</sup> Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.' Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-123).

Figure D-11: White Population and Median Income Distribution



## D.2.4 Access to Opportunities

### TCAC/HCD Opportunity Maps

The 2021 TCAC/HCD Opportunity Maps are made from composite index scores of three different domains (economic, environmental, and education) to categorize tracts as low, moderate or high resource (Table D-1 shows the full list of indicators). Categorization is based on percentile rankings for census tracts within the San Diego Region.<sup>14</sup> Higher composite scores mean higher resources. Regionally, high and highest resource areas are located in the North County. Most tracts along the coast from Carlsbad to Point Loma are high or highest resource. South County from San Diego to Imperial Beach is mostly low resource. The 2021 TCAC/HCD opportunity maps identified all census tracts in Imperial Beach as low resource (.). Locally, northern census tracts scored lower, indicating lower resources than other tracts within the City. Table H-33 shows the scores by domain.

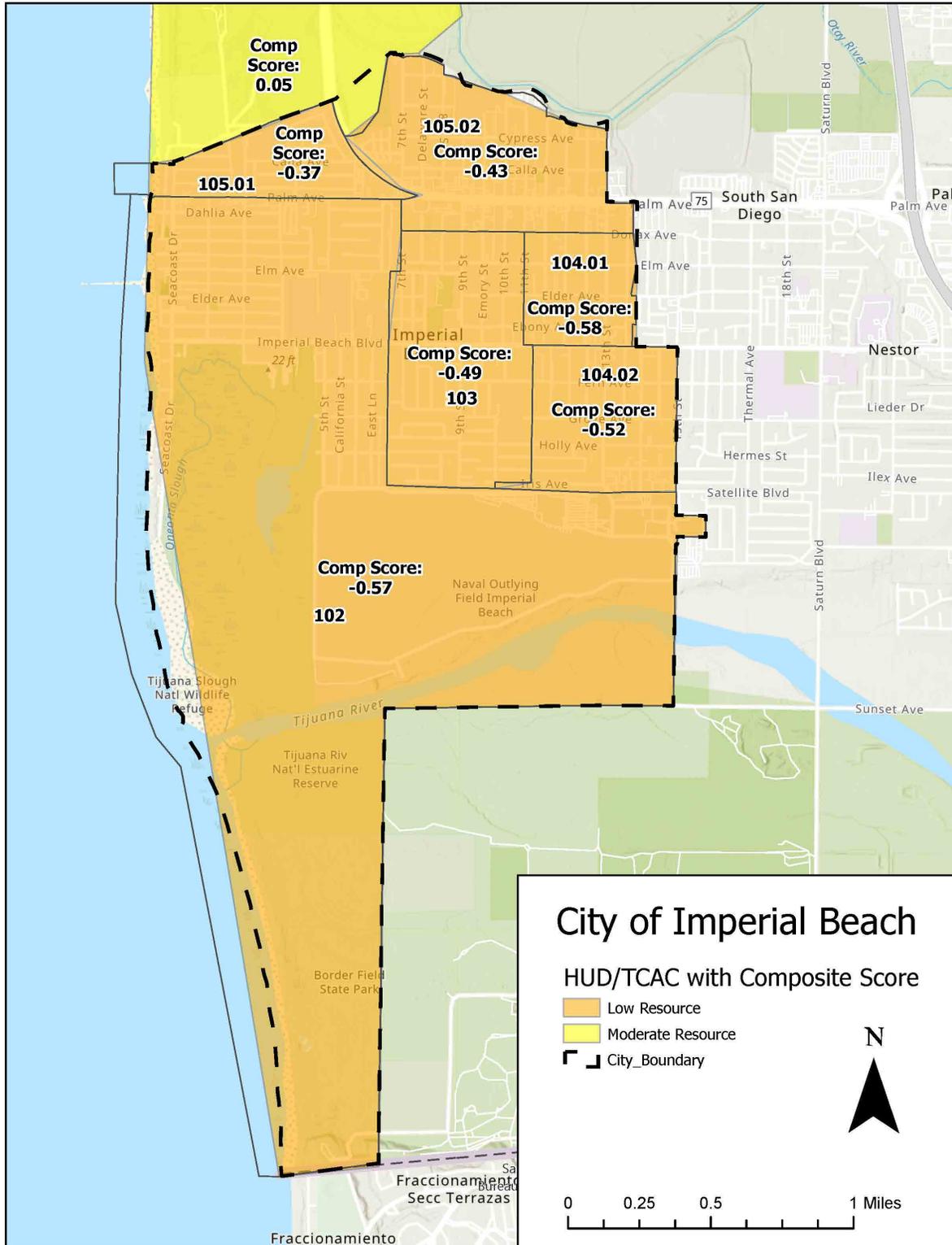
**Table D-3: Opportunity Map Scores and Categorization (2021)**

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
06073010200	0.205	0.089	0.232	-0.568	Low Resource
06073010300	0.101	0.59	0.256	-0.486	Low Resource
06073010401	0.079	0.851	0.063	-0.584	Low Resource
06073010402	0.108	0.424	0.246	-0.516	Low Resource
06073010501	0.304	0.603	0.212	-0.367	Low Resource
06073010502	0.161	0.865	0.169	-0.430	Low Resource

*Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table, December 2020*

<sup>14</sup> According to the California Fair Housing Task Force Methodology (June 2020): "Each census tract or rural block group receives a score for each indicator, except where data is missing. To account for the fact that each indicator is measured differently (e.g., percent versus dollar amount), a unit-less "z-score" is calculated for each indicator within each region. These tract level z-scores are averaged together by domain (with each indicator's score receiving an equal weighting), and the three domain scores are then averaged together to create an index score." (p.6). For a detailed description of the methodology: <https://belonging.berkeley.edu/2021-tcac-opportunity-map>

Figure D-12: 2021 HCD/TCAC Opportunity Areas



## ***Opportunity Indicators***

The 2020 Regional AI used opportunity indicators developed by HUD to help inform communities about disparities in access to opportunity. These indices are only available to Entitlement Jurisdictions (with population over 50,000 and receiving CDBG funds from HUD). For Urban County jurisdictions like Imperial Beach, for which a HUD-provided index is not provided, a similar analysis as that provided by the indices was conducted using comparable information. For example, for the Low Poverty Index, the poverty status of the population provided by the 2013-2017 American Community Survey estimates were used. The 2020 Regional AI also provided an analysis of access to opportunities based on the following indicators: poverty rate, school proficiency, unemployment rate, jobs proximity, transit metrics, and Cal EnviroScreen 3.0 Scores (Table D-4). While these metrics do not identify specific locations within the City, they helped show the relative standing of the City compared to other small jurisdictions in the Urban County (Coronado, Del Mar, Lemon Grove, Poway, and Solana Beach).<sup>15</sup> The 2020 AI did not provide the indicators for the San Diego County, so those were computed for comparison to the County in this Housing Element's fair housing assessment and are shown in .

### **Education**

According to the 2020 Regional AI, a large percentage (83.3 percent) of schools in Imperial Beach are considered Title I schools and help low-achieving children meet state standards in core academic subjects. These schools coordinate and integrate resources and services from federal, state, and local sources. Imperial Beach has a higher percentage of Title I schools than the County overall (62.8 percent).

To be considered for Title 1 school funds, at least 40 percent of the students must be considered low-income. Kidsdata.org, a program of the Lucile Packard Foundation for Children's Health, estimated that 34.7 percent of children aged 0-17 in the South Bay Union School District (which serves Imperial Beach) were living in low-income working families between 2012 and 2016.<sup>16</sup> In addition, a 2018 report by Center on Policy Initiatives (CPI) San Diego reported that Imperial Beach had the second highest youth poverty rate in South County<sup>17</sup>, with 26.4 percent of children less than 18 years old living below the federal poverty level. By comparison, only 14 percent of children in the South County Region were living below the federal poverty level.

Kidsdata.org also reported that in 2019, 84 percent of students are considered high-need (i.e. those who are eligible for free or reduced price school meals, are English Learners, or are foster youth—as reported in the Unduplicated Pupil Count) compared to 54.6 percent of students in the County.

### **Employment**

In terms of unemployment, the 2020 Regional AI reported that Imperial Beach had the highest unemployment rate (3.5 percent) of the Urban County jurisdictions (Coronado, Del Mar, Lemon Grove, Poway, and Solana Beach) but had slightly higher unemployment rates than overall San

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<sup>15</sup> Urban County refers to the jurisdictions with population less than 50,000 and participate in the County's Community Development Block Grant (CDBG) Program. These small cities do not qualify to receive CDBG funds directly from HUD,

<sup>16</sup> Definition of "low income working family": children ages 0-17 living in families with incomes below 200 percent of their federal poverty threshold and with at least one resident parent who worked at least 50 weeks in the 12 months prior to the survey.

<sup>17</sup> The South County Region includes three cities (Chula Vista, Imperial Beach, and National City), the San Ysidro neighborhood in the City of San Diego and the unincorporated areas of the southern region of the County.

Diego County (2.8 percent). However, this data was pre-COVID in February 2020. SANDAG has since reported that as of September 5, 2020, the County's unemployment rate was 13.3 percent and Imperial Beach's unemployment rate was between 12 and 14 percent. The most recent unemployment rates published by the California Employment and Development Department (February 2021) show that Imperial Beach's unemployment rate is higher than the County (10 percent and 7 percent, respectively).

### Transportation

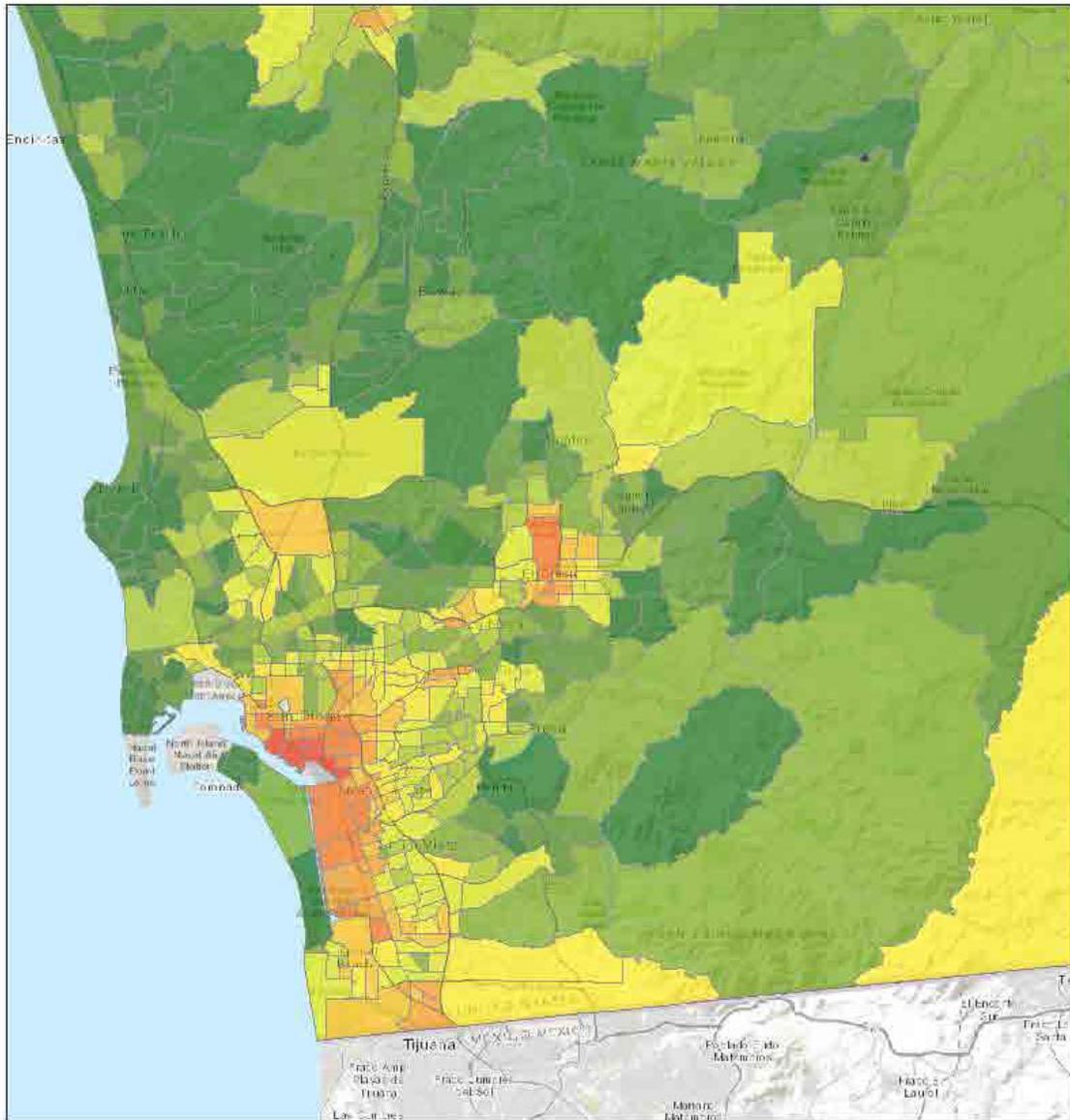
All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided by the 2020 Regional AI, Imperial Beach's score All Transit Performance score of 6.7 was among the highest for the Urban County, illustrating a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. The County All Transit score was lower than Imperial Beach's (5.3). Imperial Beach has a higher proportion of commuters that use transit (4.25 percent) than the County (3.28 percent).

### Environmental

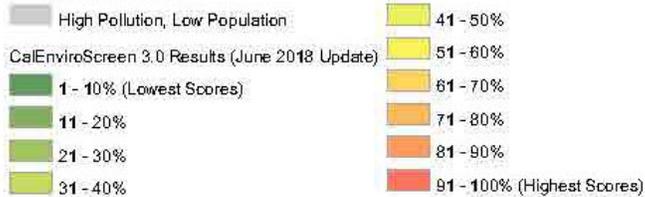
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). High scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. Imperial Beach had relative low scores (range 15-27) compared to other neighboring cities like Chula Vista (range 7-49) and National City (range 25-48) but the highest scores in the Urban County (Coronado, Del Mar, Lemon Grove, Poway, and Solana Beach). CalEnviroScreen also reports scores as percentiles to compare tracts across the entire County. The map in Figure D-13 shows that while Imperial Beach has scores within the lower percentile in the South County region, overall the Southern region has the highest scores of the region and is most impacted by pollution.

<b>Table D-4: Access to Opportunity Indicators- Imperial Beach and San Diego County</b>				
	<b>Imperial Beach</b>		<b>San Diego County</b>	
<b>Poverty Rate</b>				
Population Below Federal Poverty Level	19.0%		12.6%	
White alone	18.9%		19.9%	
Black or African American alone	31.3%		20.4%	
American Indian and Alaska Native alone	22.7%		10.3%	
Asian alone	13.8%		12.9%	
Native Hawaiian and Other Pacific Islander alone	0.0%		21.5%	
Hispanic or Latino	25.4%		13.8%	
<b>School Proficiency</b>				
Total Title I Schools	5		656	
Total Schools	6		412	
% of Schools	83.3%		62.8%	
<b>Unemployment Rate</b>				
February 2021	10.1%		7.2%	
<b>Job Proximity</b>				
<29 mins.	51.5%		62.7	
30-59 mins.	41.8%		30.4	
60 mins. or more	6.7%		7.0*	
<b>Transit Metrics</b>				
All Transit Performance Score	6.7		5.3	
Transit Trips Per Week within 1/2 Mile	1,188		1,358	
Jobs Accessible in 30-Min Trip	31,400		82,735	
Commuters Who Use Transit	4.25%		3.28%	
Transit Routes within 1/2 Mile	3		4	
<b>CalEnviroScreen Percentile</b>				
Census Tract	Score	Percentile	Score	Percentile
6073010402	30.50	60.50	18.86 (average)	33.38 (average)
6073010502	24.30	48.48		
6073010200	23.76	47.02		
6073010300	23.55	46.46		
6073010401	19.82	37.89		
6073010501	15.27	25.75		
<p><i>Sum does not equal 100 due to rounding. ACS information presented in percentages and adds up to 100.1%.  Source: 2020 Regional Analysis of Impediments to Fair Housing Choice; California Department of Education Public Schools and Data File February 2020; California Employment and Development Department, Labor Force and Unemployment Rate for Cities and Census Designated Places, February 2021; <a href="https://alltransit.cnt.org/metrics/">https://alltransit.cnt.org/metrics/</a>, accessed March 30, 2021. CalEnviroScreen 3.0 Results (June 2018 Update).</i></p>				

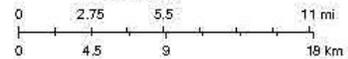
**Figure D-13: CalEnviroScreen 3.0 Percentile Scores**



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City of El Cajon, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

Web AppBuilder for ArcGIS  
City of El Cajon, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | JOEHA

## D.2.5 Disproportionate Housing Needs

The AFFH Rule Guidebook defines ‘disproportionate housing needs’ as ‘a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.’ 24 C.F.R. § 5.152” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

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. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and/or
- Units with physical defects (lacking complete kitchen or bathroom)

As shown in Table D-5 a higher percent of Black (58 percent), American Indian (100 percent), Pacific Islander (96 percent) and Hispanic (66 percent), and other non-white (68 percent) households experience housing problems compared to White (39 percent), Asian (46 percent), and all City households (52 percent). While renter-households, independent of race, experience housing problems at higher rates than owner-occupied households, Black, American Indian, Hispanic, and other non-white renter-households experience housing problems at higher rates than non-White and Asian households.

Imperial Beach households experience housing problems (52 percent) at higher rates than the County overall (45 percent Imperial Beach Non-white minority households also experience housing problems at higher rates than the County households. For example, approximately 58 percent of Hispanic households in the County have housing problems, compared to 66 percent Imperial Beach Hispanic households.

<b>With Housing Problem</b>	<b>White</b>	<b>Black</b>	<b>Asian</b>	<b>Am Ind</b>	<b>Pac Islander</b>	<b>Hispanic</b>	<b>Other</b>	<b>All</b>
<b>Imperial Beach</b>								
Owner-Occupied	32.7%	11.4%	23.9%	0.0%	0.0%	46.9%	40.0%	35.4%
Renter-Occupied	44.4%	62.4%	52.7%	100.0%	96.0%	70.1%	79.5%	59.8%
All Households	38.8%	58.0%	45.7%	100.0%	96.0%	65.8%	67.5%	52.0%
<b>San Diego County</b>								
Owner-Occupied	31.2%	39.7%	33.6%	25.2%	31.5%	43.0%	35.6%	33.9%
Renter-Occupied	50.9%	62.3%	51.1%	52.0%	60.9%	67.1%	55.2%	57.1%
All Households	38.9%	55.4%	41.0%	38.0%	51.6%	57.7%	46.9%	44.8%
Source: HUD CHAS 2013-2017								

Elderly and large households may also be subject to disproportionate housing problems, whether it is affordability or adequate physical needs (number of rooms, complete facilities). Table D-6 shows that renter elderly and large households experience housing problems at the greatest greater rates than all households in the City. Renters in both the City and the County experience housing problems at a greater rate than owners. However, a larger proportion of renter-households experience housing problems than all the County large renter-households.

With Housing Problem	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
Imperial Beach	55.3%	85.5%	60.2%	27.1%	43.3%	35.1%	52.2%
San Diego County	62.1%	79.6%	57.1%	33.8%	46.3%	33.9%	44.8%

Source: HUD CHAS 2013-2017

### **Cost Burden**

A household is considered cost burdened if it spends more than 30 percent of its income in housing costs, including utilities. Similar to the any housing problem trends, Black, American Indian, Hispanic, and non-white Other households experience cost burdens at higher rate (about 20 percent) than White and Asian households and 10 percent above all City households (Table D-7). These racial minorities experience cost burdens at slightly higher rates in the City and the County. Also, renters, regardless of race, experience cost burdens at higher rates than owners in both the City and County.

Imperial Beach elderly and large households also experience cost burdens at slightly lower rates than the County, but renters of these groups experience the cost burden at the highest rates. More than half of elderly renter-households experience cost burdens (Table D-8).

Cost Burden >30%	White	Black	Asian	Am Ind	Pac Islander	Hispanic	Other	All
Imperial Beach								
Owner-Occupied	32.2%	11.4%	16.7%	0%	0.0%	39.2%	41.2%	32.8%
Renter-Occupied	43.6%	64.0%	40.2%	100.0%	16.0%	60.5%	71.8%	53.4%
All Households	38.2%	59.5%	34.5%	100.0%	16.0%	56.5%	62.5%	46.9%
San Diego County								
Owner-Occupied	30.4%	37.5%	30.6%	22.2%	0.0%	36.3%	34.1%	31.7%
Renter-Occupied	48.5%	58.9%	43.7%	46.1%	54.2%	58.2%	51.4%	52.0%
All Households	37.5%	52.3%	36.2%	33.6%	46.9%	49.7%	44.1%	41.2%

Source: HUD CHAS 2013-2017

With Housing Problem	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
Imperial Beach	55.6%	53.9%	53.6%	26.9%	29.3%	32.9%	47.1%
San Diego County	59.8%	56.0%	52.0%	33.5%	31.3%	31.7%	41.3%

Source: HUD CHAS 2013-2017

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income as their primary source of income, which ranges from \$954 to \$1,776, depending on their qualifications. Households may experience cost burden when SSI incomes are not adequate to pay for rent and not increasing at rates comparable to rent increases. According to Table H-29: Average Monthly Rent (2019), there are no affordable rental options for SSI recipients without spending more than 30 percent on housing.

The highest concentration of renter- and owner-households experiencing cost burdens are located on the Northeastern and Southeastern census tracts within the City (Figure D-14). Between 60 and 80 percent of households in most tracts in this area experience housing cost burdens. These census tracts also have high minority concentration (especially Hispanic) and low and moderate income households.

### ***Overcrowding***

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2018 five-year ACS estimates, a higher percentage of households in Imperial beach (10.8 percent) are living in overcrowded conditions than the County (6.7 percent). Regionally, census tracts with overcrowded households are concentrated in the South County, particularly in the City of San Diego, Chula Vista, and National City. Meanwhile, within Imperial beach, overcrowded households are located in the northeastern part of the County, near Palm Ave (Figure D-15). In two census tracts here, between 15 and 20 percent of households are overcrowded. This suggests a need for large housing units, which the City has already been working to incentivize. On August 2012, the City adopted a Commercial Zoning Amendment (Ordinance No. 2012-1130) that permitted an increased maximum density for multi-family residential units if the development met at least two development incentives. The development incentives included that at least 25 percent of proposed residential units are three-bedroom units.

### ***Substandard Conditions***

The City estimates that about 7 percent of homes (710 units) in Imperial Beach are in substandard condition. This figure is based on a report from the National Center for Healthy Housing, which measures “basic housing quality” throughout the nation. The basic housing quality metric is based on the percentage of homes with “severe” or “moderate” housing problems. In the San Diego Metropolitan Service Area, the basic housing quality statistic is 7.2 percent.

Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Over 80 percent of housing is older than 50 years old in all tracts of the City (Table D-9). However, old housing units are concentrated in census tracts 103.00 and 104.01, which are located in the north-center of the City. Most new housing has been built in the last 30 years in tract 102.00 and 105.02, which are located along the Coast.

Table D-9: Age Housing Built						
Age of Housing Units	Census Tract					
	102.00	103.00	104.01	104.02	105.01	105.02
1969 or Earlier (50+Years)	45.5%	70.8%	53.7%	50.3%	63.1%	31.0%
1970-1989 (30-50 Years)	34.1%	25.9%	37.1%	39.7%	26.5%	49.4%
1990 or After (<30 years)	20.4%	3.3%	9.2%	10.0%	10.4%	19.6%

### ***Displacement Risk***

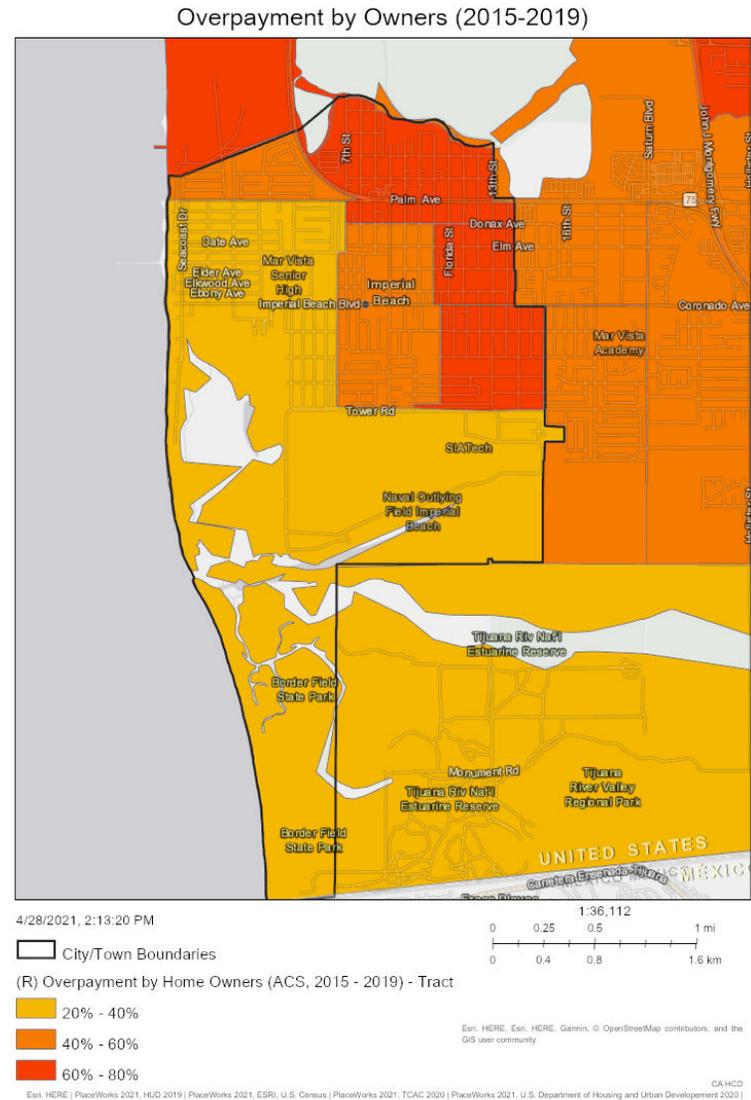
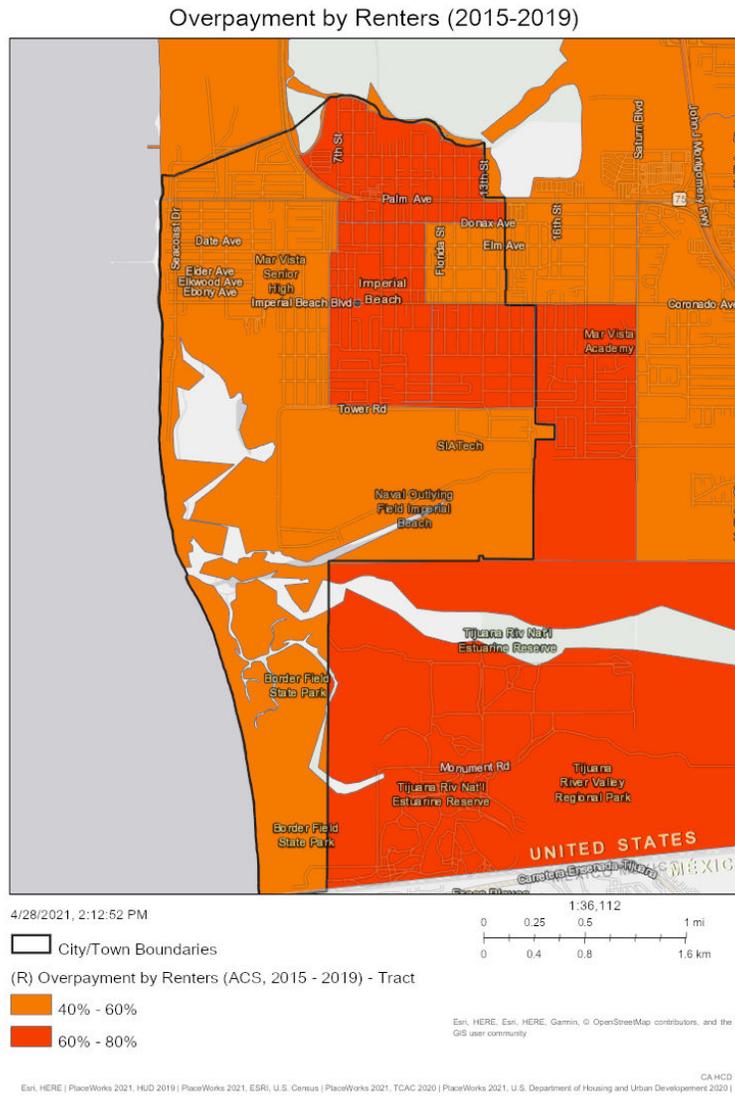
UCLA’s displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the UCLA team has an interactive map that display changes in neighborhood characteristics that may indicate displacement. Two key factors in visualizing displacement are the loss of low income households and increases in rent. As Figure D-16 shows, between 2000 and 2015, Imperial Beach experienced among the highest increase in median income and highest increases in median gross rents in the region. In fact, the Urban Displacement project has identified most census tracts in Imperial Beach as recently becoming gentrified<sup>18</sup> between (2000 and 2015).

Within the City, census tracts in the northeastern portion of the City have experienced the highest increases in gross rents have experienced the lowest change in median income. Figure D-17 also shows that these census tracts continue to have the highest proportion of cost-burdened renters in the City. This indicates that increases in rents in this LMI area could potentially displace residents.

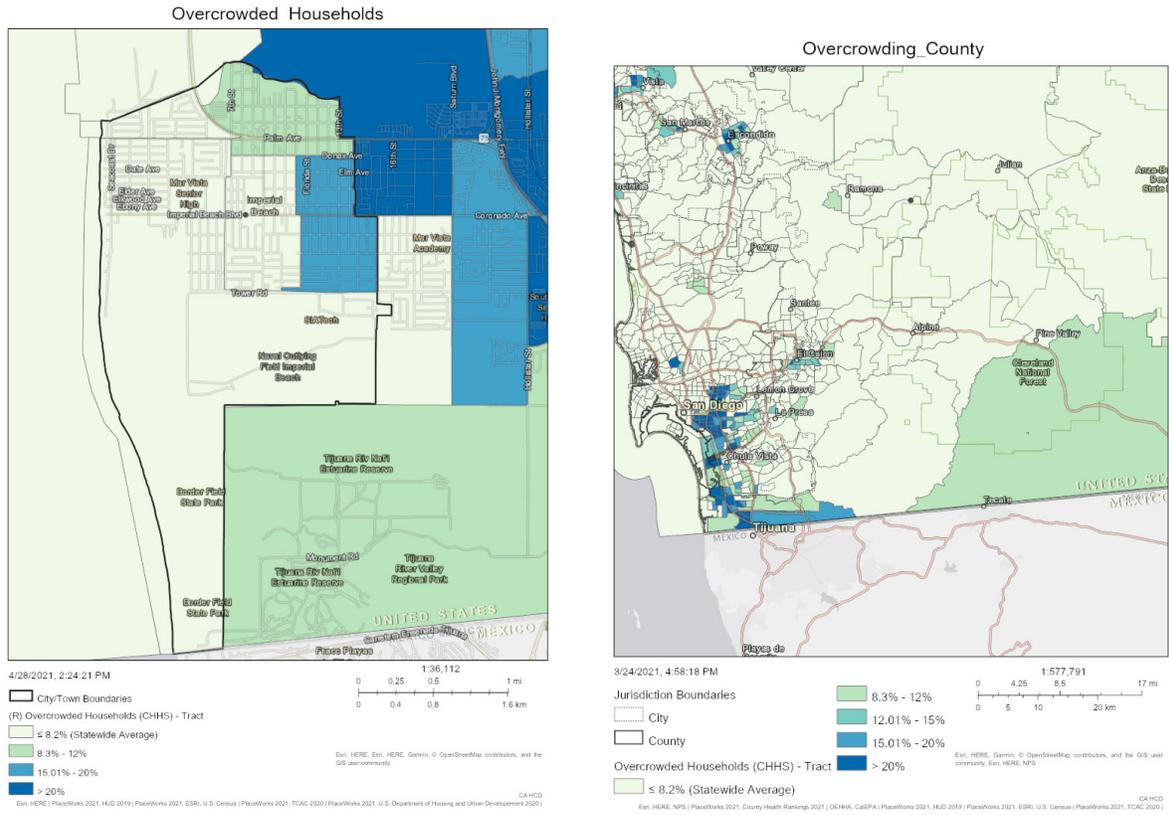
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<sup>18</sup> Gentrification and displacement are phenomenon that often occur together and the terms are used interchangeable. However, the Urban Displacement Project defines gentrification as a process of neighborhood change that includes economic change in a historically disinvested neighborhood —by means of real estate investment and new higher-income residents moving in - as well as demographic change - not only in terms of income level, but also in terms of changes in the education level or racial make-up of residents.

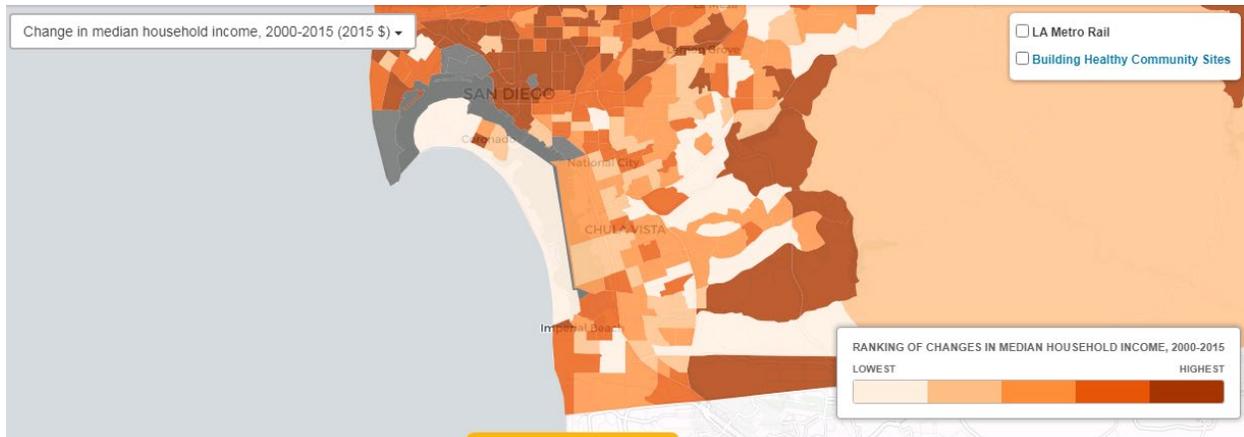
Figure D-14: Distribution of Cost Burdened/Overpayment Households



**Figure D-15: Distribution of Overcrowded Households**



**Figure D-16: Displacement Indicators**  
 (A) Change in Median Household Income (2000-2015)

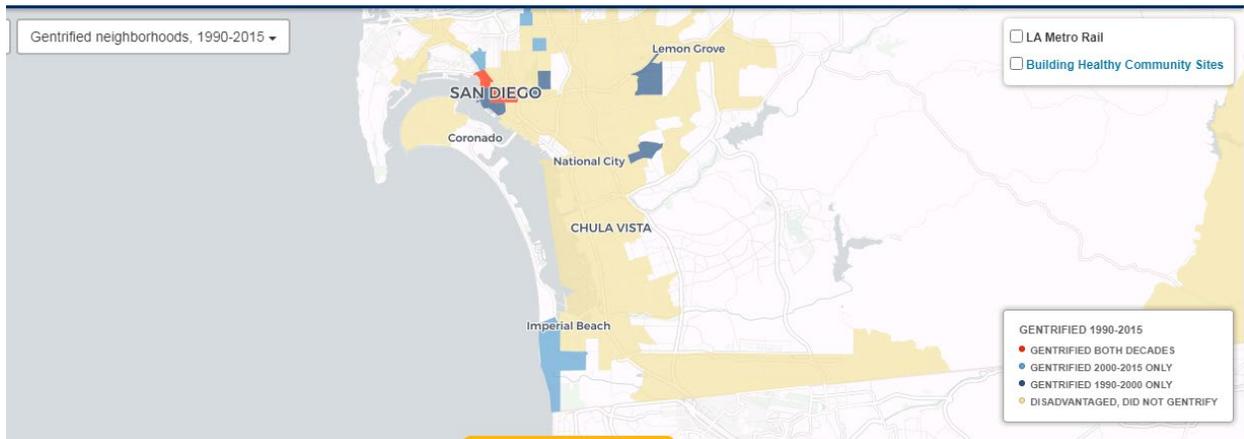


**Figure D-16: Displacement Indicators (Continued)**

**(B) Change in Median Gross Rent (2000-2015)**

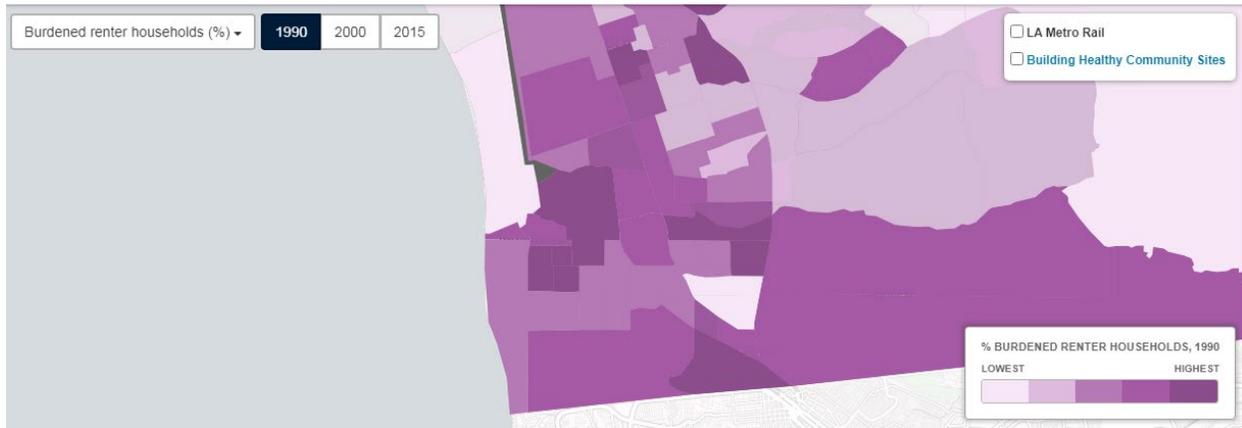


**(C) Gentrified Neighborhoods (1990-2015)**



Source: Urban Displacement Project. UCLA. Accessed March 31, 2021. <https://www.urbandisplacement.org/map/socal>.

**Figure D-17: Change in Cost Burdened Households (1990-2015)**  
 (D) Burdened Renter Households (1990)



(E) Burdened Renter Households (2015)



## Other Data

### Tenure

Imperial Beach's population is made up of primarily renters. According to 2013-2017 CHAS data, 69 percent of households are rented, compared to 47 percent of households in the County. UCLA's Urban Displacement project has also mapped changes in renter population from 1990 to 2015. According to their maps, Imperial Beach has among the highest concentration of renters in the South County and within the City, renters are concentrated in the northeastern census tracts of 105.02, 104.01 and 104.02. Most notably, renter-households have decreased in census tract 105, in the northwestern side of the City (Figure D-18).

**Figure D-18: Change in Renter Households (1990-2015).**



Source: Urban Displacement Project. UCLA. Accessed March 31, 2021. <https://www.urbandisplacement.org/map/socal>.

### *Mortgage Lending*

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. Table D-10 examines detailed 2017 HMDA data for Imperial Beach and the County.

Hispanics were greatly under-represented, making up only 21 percent of the City’s applicant pool but 51 percent of the City’s population. By Contrast, Whites are overrepresented, accounting for 51 percent of the applicant pool but only 31 percent of the population. Asian and Hispanic applicants were also denied at higher rates than White, Black, and Native Hawaiian applicants in the City. In the County, Hispanics were also greatly underrepresented in the applicant pool. Denial rates were also greater for minority applicants than White applicants.

	Imperial Beach			San Diego County		
	% Applicant Pool	% Population	Denials	% Applicant Pool	% Population	Denials
White	50.6%	31.4%	15.1%	51.5%	46.2%	13.3%
Black	3.4%	4.0%	4.4%	3.1%	4.7%	19.9%
Hispanic	21.0%	51.3%	20.4%	16.4%	33.4%	17.5%
Asian	5.5%	7.9%	20.3%	9.7%	11.5%	14.8%
Native American	0.1%	0.0%	0.0%	0.3%	0.4%	20.4%
Hawaiian	0.6%	0.7%	12.5%	1.1%	0.4%	16.2%
Other	18.9%	4.2%	14.7%	17.8%	3.5%	16.0%
Total	1,335	27,270	214	135,903	3,283,665	20,183
Source: Source: www.lendingpatterns.com, 2020. 2013-2017 ACS 5-Year Estimates.						

## D.2.6 Outreach

The City of Imperial Beach has recently hired a Housing Programs specialist whose role will include expanding the outreach efforts by the City. Some of the tasks that will be undertaken by the Housing Specialist include:

- Provide information and services to the public on housing programs, housing needs and housing emergencies.
- Conduct research and analysis related to housing including local and regional housing issues and programs.
- Assist residents with information on housing programs; provide information to tenants and landlords.
- Develop community relationships with organizations and landlords that will support the housing needs of the City including maintaining a list of potential resources related to tenant and landlord disputes.
- Develop and maintain housing informational brochure, City webpage, handouts and lists; perform outreach activities related to housing programs; disseminate information on various housing programs.
- Advise tenants and property-owners of their rights and responsibilities identify funding source and write grant applications related to housing.
- Establish and maintain effective working relationships with staff, vendors, governmental agencies, community organizations and the public.
- Assist the Community Development Department with CDBG projects as it relates to housing.

The City is also working on a new agenda system to improve public participation. The new electronic system allows for ADA compliant access to agendas on the website, in addition to in-person availability. The City makes an effort to advertise City Council meetings and workshops with a message boards for individuals that do not have access to the internet. In addition, the City

participates in regional digital divide workshops with the intention to understand how to better serve the community and develop digital equity and transparency. City staff regularly holds in-person meetings in different portions of the City to provide information and receive feedback on community concerns.

The City has also recently implemented Council representation by district, which is expected to improve representation of residents in Council as well as facilitate communication between residents and the City.

## **D.2.7 Summary of Fair Housing Issues**

### ***Findings from 2020 Regional Analysis of Impediments to Fair Housing Choice***

The City of Imperial Beach participated in the 2020 San Diego Regional Analysis of Impediments to Fair Housing (2020 Regional AI). The 2020 Regional AI concluded that the following were impediments to Fair Housing Choice in the San Diego Area (**regional impediments shown in bold**). The relevance to Imperial Beach is included below:

- **Hispanics and Blacks continue to be under-represented in the homebuyer market and experienced large disparities in loan approval rates.** Blacks were not significantly under-represented in the homebuyer market in Imperial Beach. Variation between percent of applicant pool (3 percent) and percent of the City's population (4 percent) was not significant. However, Hispanics were greatly under-represented, making up only 21 percent of the City's applicant pool but 51 percent of the City's population. Hispanic and Asian applicants were denied at higher rates than Whites and Blacks.
- **Due to the geographic disparity in terms of rents, concentrations of Housing Choice Voucher use have occurred.** There is no high concentration of HCV in Imperial Beach. The City received 1.3 percent of Housing Choice Vouchers administered by the County.
- **Housing choices for special needs groups, especially persons with disabilities, are limited.** Special needs residents, especially those that rely on SII could incur cost burdens due to a lack of affordable housing options.
- **Enforcement activities are limited. Fair housing services focus primarily on outreach and education; less emphasis is placed on enforcement.** Legal Aid Society of San Diego (LASSD) provides fair housing services to the City of Imperial Beach. The City of Imperial Beach advertises Fair Housing Services through placement of a fair housing services brochure at public counters, local library and will include a link to LASSD in its website (Program 14). The City will continue to refer fair housing complaints to appropriate agencies. Between 2014 and 2019, LASSD served 341 Imperial Beach residents. Records for only one site tested were provided in the 2020 Regional AI. More testing is needed. Like the County, the City needs to place more emphasis on enforcement activities.
- **People obtain information through many media forms, not limited to traditional newspaper noticing or other print forms.** A balance of new and old media needs to be created to expand access to fair housing resources and information with an increasing young adult and senior population in Imperial Beach.
- **Patterns of racial and ethnic concentration are present within particular areas.** While the 2021 TCAC/HCD Opportunity maps did not identify any areas of high poverty and segregation in Imperial Beach in the 2021 Opportunity Maps, most census

block groups (five of 19) located along the coast and Eastern region had a minority population that exceeded the County average minority of 54.2 percent. In addition, these areas with high minorities also tended to have high percentages of low and moderate income households ( and ).

### **Summary of Additional Fair Housing Concerns**

Additional fair housing concerns identified as part of this Housing Element update are summarized below:

- Persons with disabilities are most likely to be affected by fair housing issues as they reportedly experience more housing discrimination than other groups. Persons with disabilities are also more likely to experience cost burdens, particularly if they rely on SII as a form of income. Persons with disabilities are not concentrated in any particular location in the City.
- The City has a few tracts with concentrated minority and low- and moderate-income populations. These tracts (105.02 and 104.01) in the northeastern edge of the City. Census tract 104.01 also has a high concentration of single female-headed households with children and overcrowded households. By contrast, tract 105.01 is a racially concentrated area of affluence, as it has a high percent of white population and the highest median income ranges. This census tract has also seen a decrease in renter population in the last 30 years.
- Census tracts in the northeastern part of the county, in addition to having a high concentration of minority population and LMI households, have had low changes in median income and high changes in gross rents from 2000 to 2015, which could be an indicator of potential displacement.
- Census tracts in the northeastern part of the City also have the highest proportion of housing stock over 50 years old and may need rehabilitation.

### **D.2.8 Local Data and Knowledge**

The southeast and northeast residential portions of Imperial Beach have a pattern of residential overcrowding and prevalence of cost burdened/overpayment households. The same areas are known for having concentrations of Hispanic, Filipino, and military populations. Southeast Imperial Beach is adjacent to the military base, which may account for the some of the overrepresentation of these populations. These ethnic groups tend to have a higher proportion of lower incomes which may account for the disproportionate cost burden ratios. The populations living in these areas of Imperial Beach may be first- or second-generation Americans, in which case immigration and assimilation factors may account for some of the overcrowding.

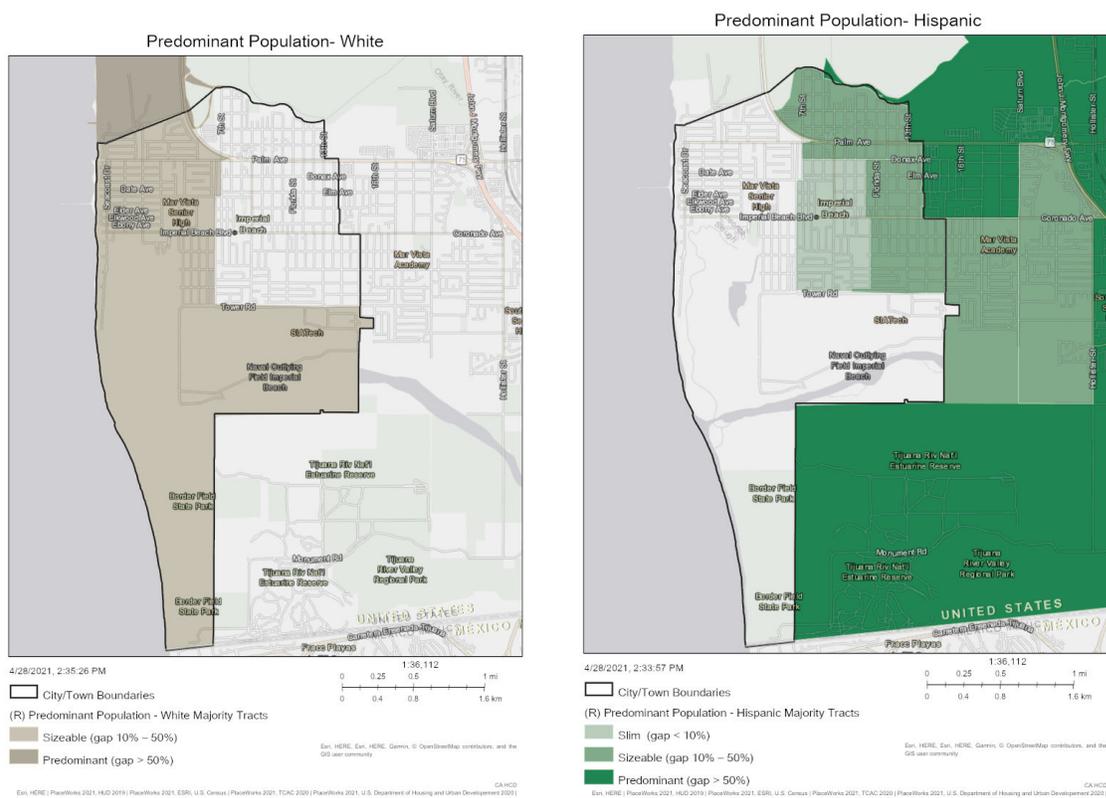
The northeast and southeast portions of Imperial Beach are situated closest to the transportation corridors of Palm Ave, 13th St. and Imperial Beach Blvd. Complete-streets projects in recent years have been focused along these corridors, which have enhanced multi-modal transportation that enhances accessibility for pedestrians, bicyclists, and transit. These projects make the surrounding residential areas more accessible to these transportation corridors. Other enhancements include ADA improvements throughout these portions of Imperial Beach to further increase accessibility.

## D.2.9 Other Contributions

Other contributions that affect the accumulation of wealth and access to resources include historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

Historically, exclusionary housing policies such as redlining and discriminatory racial covenants reduced economic opportunities and quality of life for minorities by denying them mortgages and encouraging disinvestment areas with communities of color. While no redlining maps or analysis has been prepared for Imperial Beach, Census data indicates increased White population in the western half of the City and increased Hispanic populations along the bay and in the eastern half of the City, which is a pattern observed regionally (Figure D-19).

**Figure D-19: Distribution of Predominantly White and Predominantly Hispanic Population<sup>1</sup>**



Note 1: White and Hispanic populations were the only racial/ethnic groups to have any discernable gaps between census tracts.

The City has also actively prioritized public infrastructure in low and moderate income areas by focusing most of its CDBG funds on public improvements (Housing Program #2). The City applies for and receives an annual allocation of CDBG funds from the County of San Diego, Department of Housing and Community Development Services (HCDS), under the San Diego Urban County Program for CDBG. These funds are used to install and upgrade public facilities (streets, curb, gutter, drainage facilities, and utilities). The infrastructure improvements encourage increased private market investment in declining or deteriorating neighborhoods. Between FY 2013 and FY

2019, the City received approximately \$828,870 in CDBG funds through the Urban County program. The City used these funds for:

- A new fire engine for the Imperial Beach Fire Station
- Imperial Beach Blvd Pedestrian Crosswalk Project
- Rose Teeple Park Improvements Project- resurfacing of playground, new park amenities, new LED lighting
- Reconstruction of the Senior Center located 1075 8th St

The City has also focused additional funds on the following infrastructure improvement projects:

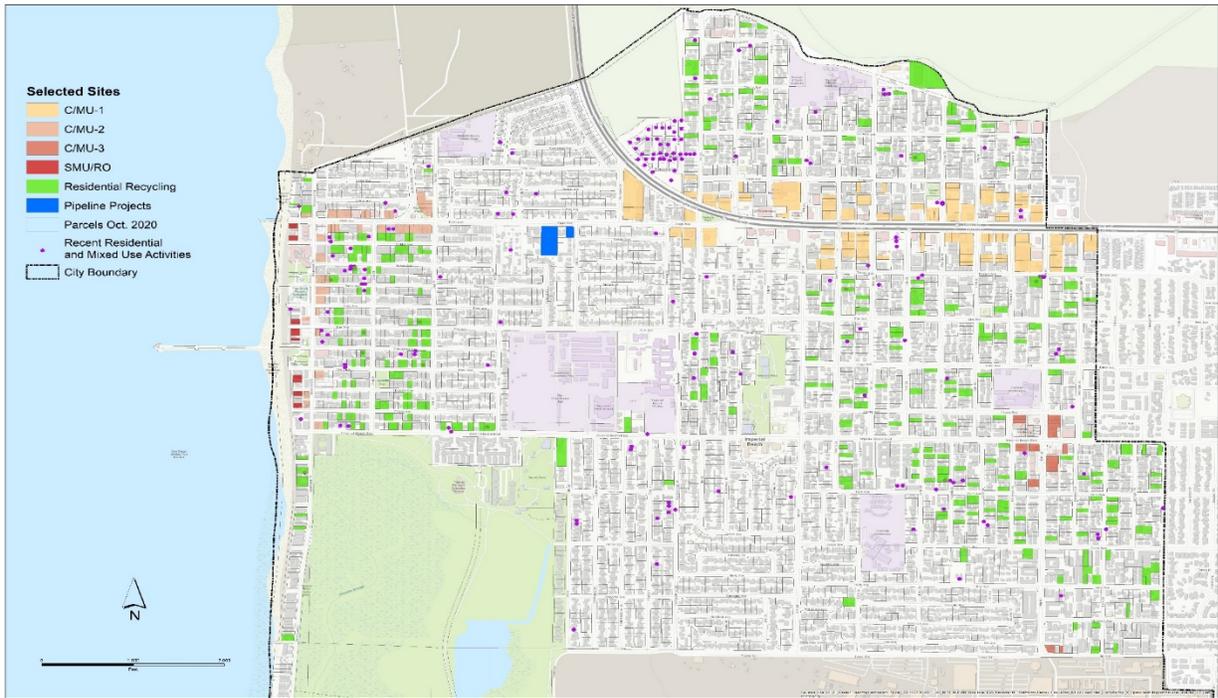
- Imperial Beach Blvd. Enhancement Project from Seacoast Drive to 15<sup>th</sup> St.
- Right of way improvements on 13<sup>th</sup> St. – reclassified road from 4 lanes to 3 lanes and added art crosswalks
- Revitalization of 13<sup>th</sup> St
- Improvements at Bikeway village – right of way improvements including to the bike lanes and a new viewing deck
- Improvements to pedestrian access ramps on Georgia St., 15<sup>th</sup> St, and 13<sup>th</sup>, Grove Ave & Iris Ave. between 5<sup>th</sup> St and Connecticut St.
- Improvements to bicycle and pedestrian and transportation infrastructure on 9<sup>th</sup> St.
- Palm Ave. master plan for additional bike lanes

The conversion of federally-and -state-subsidized affordable rental developments to market-rate units can constitute a substantial loss of housing opportunity for low income residents. There are six affordable housing projects located in Imperial Beach with a total of 186 affordable units (Table H-31). None of these units are at-risk of conversion over the 2021-2029 planning period.

### **D.3 Sites Inventory**

The City's residential neighborhoods are primarily built out. Future residential development will likely occur within the City's mixed use overlay. This RHNA strategy relies on underutilized commercial properties where residential uses are permitted. Of the 1,329 RHNA units allocated to the City, only 412 units have been identified to come from residential recycling. Figure D-20 illustrates the location of the sites inventory for RHNA.

Figure D-20: Location of Sites to Meet RHNA



As Table H-45 shows and Figure D-18 show, sites to accommodate RHNA are located throughout the City. Affordability assumptions based on sited lower income units along mixed-use sites which are located in the Southeastern portion of the City and along the coast. With this distribution, lower income sites are not concentrated in a single geographic area (or areas of racial and income segregation: see discussion below).

- **Improved Conditions:** The spatial analysis showed that tracts with low and moderate income households, concentrated minorities, and housing problems were located in the northeastern and southeastern tracts of the City. However, the City has also selected sites along the coast, those with C/MU-2 and CMU-3 zoning, to be able to accommodate lower income RHNA units.
- **Exacerbated conditions:** The northeastern and southeastern areas, which has census tracts with concentrated minorities, cost burdened households, and overcrowded households, can accommodate housing of a variety of income levels since these tracts have a variety of zoning – C/MU-1 (lower and moderate income); R-2000 (moderate income); and R-1-6000 (above moderate income). Thus, lower income sites are not concentrated in a single geographic area (or areas of racial and income segregation: see discussion below). The City has also focused public infrastructure and beautification improvements in these northeastern and southeastern areas of the City to encourage private investment and development in these areas.

### D.3.1 Integration and Segregation: Race and Income

Census tracts with the highest concentration of minority races and low- and moderate-income population (LMI) are located in the northeastern and southeastern part of the City. The sites inventory identified mixed-use (C/MU-1) sites in this area as well as some residential recycling sites within these tracts for housing. However, other sites in the C/MU-2, C/MU-3, and SMU/RO zones outside of the high minority concentration areas offer additional opportunities for lower income housing.

### **D.3.2 Racially/Ethnically Concentrated Areas of Poverty and Affluence**

While no racially/ethnically concentrated areas of poverty (per HUD's definition) were found in Imperial Beach, some tracts with a high concentration of minorities and LMI populations were found in the northeastern and southeastern part of the City (see above). Census tract 105.01 can be considered a concentrated area of affluence as it has a large proportion of White population and the highest range in median income. Some mixed-use (C/MU 1 and C/MU-2) sites feasible for lower income housing and residential recycling sites identified in the sites inventory are located in more affluent areas.

### **D.3.3 Access to Opportunity**

Since the City is made up of six census tracts, all of which are considered low resource areas (Table D-3, Figure D-12), housing units in the sites inventory are not disproportionately concentrated in different resource areas. In addition, the City has identified sites in its Sites Inventory located all around the City (Figure D-10).

### **D.3.4 Disproportionate Housing Needs**

The fair housing assessment found a need for affordable housing for people with disabilities and adequate housing for large families. The City incentivizes the production of units with 3 or more bedrooms through the Commercial Zoning Amendment (Ordinance No. 2012-1130) that permits an increased maximum density for multi-family residential units if the development met at least two development incentives. The development incentives included that at least 25 percent of proposed residential units are three-bedroom units. Since 917 units (70 percent) of units in the sites inventory are located in mixed-use sites, it is possible for developers to take advantage of these density allowances to expand access to large housing units.

Figure D-14 and Figure D-15 show that census tracts with the highest concentration of cost burdened and overcrowded households were in the northeastern and southeastern areas of the City. These areas have a variety of zoning including mixed-use (C/MU-1), feasible for facilitating lower income housing, and R-2000 and R-3000 sites, feasible for moderate income housing.

## **D.4 Identification and Prioritization of Contributing Factors**

The following are contributing factors that affect fair housing choice in Imperial Beach.

### **D.4.1 Insufficient and Inaccessible Outreach and Enforcement**

The 2020 Regional AI and the Fair Housing assessment found that outreach and enforcement were inadequate. This was due most to the reliance on old print media to advertise meetings. The analysis also found that since 2020, only one site was tested for potential discrimination.

**Contributing Factors:**

- Lack of a variety of media inputs
- Lack of marketing community meetings
- Insufficient fair housing law enforcement and testing

**D.4.2 Concentration of minority and low- and moderate-income population and special needs groups**

The analysis found a concentration of low and moderate and minority households in the northeastern census tracts of the City. These tracts also had a high concentration of large households and single-female headed households with children. These tracts were also found to have higher environmental burdens. These households need increased access to affordable housing and improved infrastructure and public facilities.

All of the mixed-use zones in the City are located in transit corridors, which should improve access to transit and other services for these special needs groups. In addition, by focusing housing in mixed-use zones zoned for high-density, multi-family developments subject to ADA will bring housing choices accessible to persons with disabilities. City Council has also been actively trying to improve the northern portion and has focused efforts here through provision of parks, artwork, and other amenities along 13<sup>th</sup> Street and Ivy Blvd, and working with SANDAG to provide Bayshore bikeway.

**Contributing Factors:**

- Lack of private investments
- Locating and type of affordable housing
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure

**D.4.3 Displacement Risk**

Census tracts in the northeastern area of the City are at risk of displacement as a high portion of their renters experience cost burdens and gross rents continue to increase.

**Contributing Factors:**

- Unaffordable rents
- Concentration of poverty in some census tracts
- Availability of affordable housing

**D.4.4 Substandard Conditions**

Census tracts in the northeastern part of the City also have the highest proportion of housing stock over 50 years old and may need rehabilitation. The City offers fee reductions for home improvements for existing homeowners. Is exploring partnerships with nonprofits to offer home

improvements. As of March 2021, the City was in conversation with Sierra service projects –to offered free service to low-income households for home improvements.

**Contributing Factors:**

- Age of housing stock
- Cost of repairs or rehabilitation

# LAND USE ELEMENT

*Each City differs from every other City in its physical characteristics and in nature of its opportunities, so that the development of every City must be along individual lines. This very fact allows full scope for the development of that peculiar charm which, wherever discovered and developed irresistibly draws to that City people of discrimination and taste, and at the same time begets a spirit of loyalty and satisfaction on the part of the citizens.*

Daniel Burnham  
The American Plan

## BACKGROUND

The Land Use Element establishes the framework for development of the City, providing for the general distribution, location and extent of the uses of the land for housing, business, industry, open space, recreation, natural resources and other uses of public and private land.

The Element includes both land use maps and a text. The policies and maps have been harmonized with all other elements and policies of the General Plan. All elements of the General Plan carry equal weight and the Land Use Element does not supersede other elements.

Table L-1 summarizes existing development within the City and provides a projection of additional development that could be accommodated at full build out based on the land use policies of the Plan. Few cities actually ever completely build out, so the number indicated can be considered a maximum.

In 1993, the City contained approximately 9,663 dwellings in single-family, two-family, multi-family, condominiums and mobile homes, with an estimated population of 27,778. Build out shows a potential of 1,164 additional units for a total of 10,827 units. Complete build-out would result in a population of about 30,750. From a residential perspective, the City is presently 89% built out.

In the category of retail, service, manufacturing and office uses, the City currently has 873,943 square feet of building area. There are 144 hotel or motel rooms. Build out projects a potential for an additional 611,161 square feet of commercial building space for a total of 1,485,104 square feet of commercial and industrial building space. From a commercial and industrial perspective, the City is 59% built out.

Table L-1				
Imperial Beach 1993 Land Use and Build Out Land Use				
	1993 Existing		Draft General Plan Build Out	
Single Family	2,903 d.u.	30%	2,439 d.u	23%
Two-Family	1,490 d.u.	15%	2,076 d.u	19%
Apts & Condos	4,979 d.u.	52%	6,145 d.u	57%
Mobile Home	291 d.u.	3%	167 d.u	1%
<b>Total Housing Units</b>	<b>9,663 d.u.</b>	<b>100%</b>	<b>10,827 d.u</b>	<b>100%</b>
Commercial Bldg.	783,743 sq. ft.		1,394,904 sq. ft.	
Industrial Bldg.	90,200 sq. ft.		90,200 sq. ft.	

# GOALS

## GOAL 11 SMALL BEACH ORIENTED TOWN

The overriding goal for Imperial Beach shall be the retention of the quality of life and atmosphere of a small beach-oriented town.

- A town that is not overcrowded or exclusive like many California beach communities.
- A town with a human scale and a relaxed pace of life.

Specific aspects of this goal include:

### a. Residential Neighborhoods

Future plans should foster keeping residential neighborhoods stable, well maintained, and pedestrian oriented. These plans should provide the means and incentives to encourage upgrading and rehabilitation of existing housing and, where possible, enhancement of public services. New buildings should also be encouraged with emphasis on appropriate scale, open space and diversity in architectural design.

### b. Natural resource Protection

All land use proposals shall respect, preserve and enhance the most important natural resources of Imperial Beach, those being the ocean, beach, San Diego Bay and the Tijuana River Valley.

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**c. Immediate Ocean Shoreline**

The ocean, beach and the immediately abutting land are recognized as an irreplaceable natural resource to be enjoyed by the entire City and region. This unique, narrow strip of land should receive careful recognition and planning. The purpose of the beach is to make available to the people, for their benefit and enjoyment forever, the scenic, natural, cultural, and recreational resources of the ocean, beach and related lands.

**d. Visitor/Resident Balance**

The California coast is an extremely desirable place to live, work and recreate that belongs to all the people. As such, congenial and cooperative use by both residents and visitors is recognized. Such use should capture the best attributes of the City and creatively determine the acceptable place, scale, intensity, rate and methods for development consistent with resource protection and the retention of the character of a small beach-oriented town.

**e. Economic Development**

The City shall foster development of a broader tax base to support residents of, and visitors to the City. However, this development must be compatible with the goal of remaining a small, beach-oriented town. Economic activities should focus on generating income through expanded local services, visitor serving uses and ecotourism and research related to the City's natural resources.

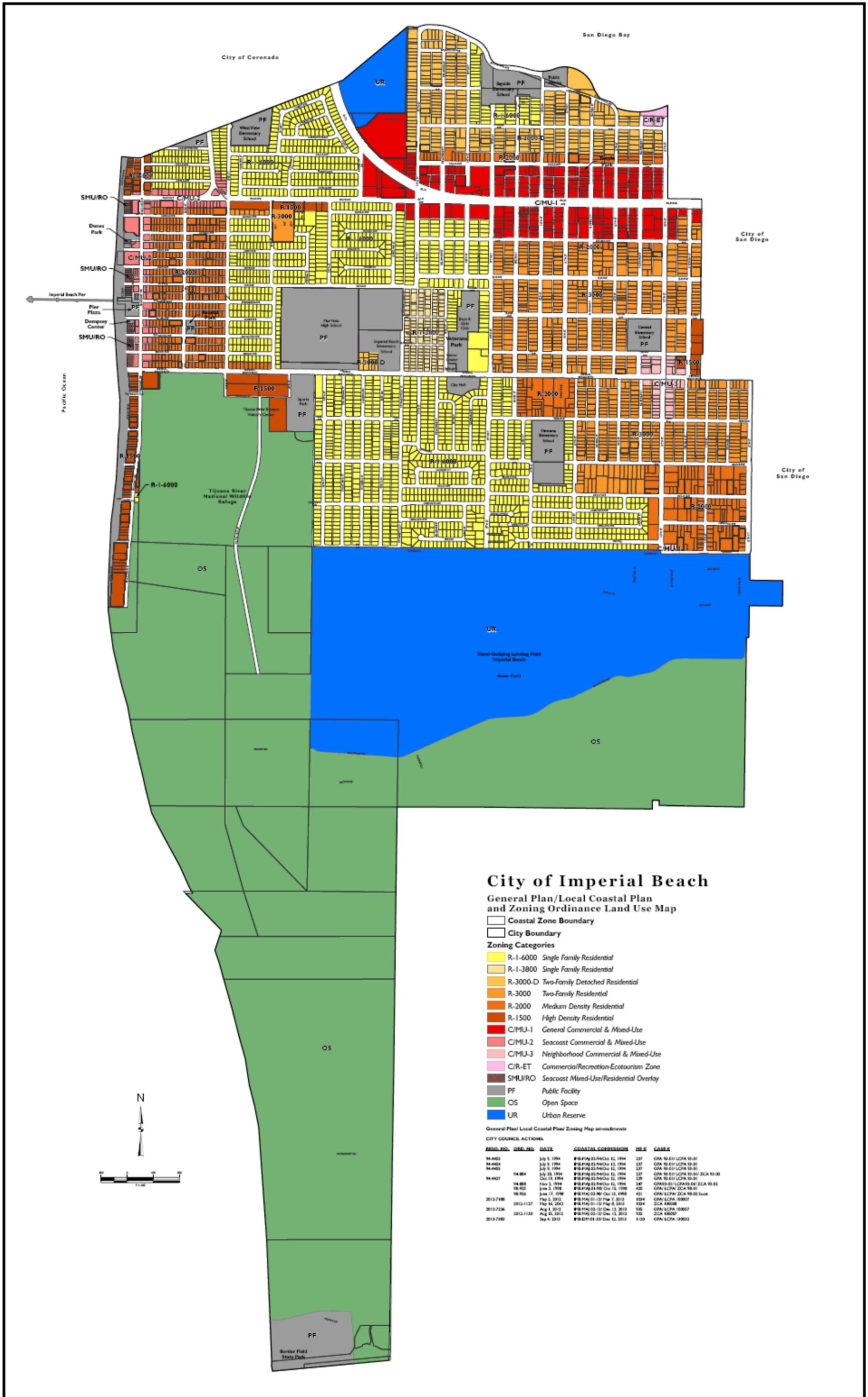
## **POLICIES**

**L-1 Land Use Map**

Land uses shall be regulated as shown on the Land Use Map, Figure L-1.

**L-2 Land Use Categories**

Land Use categories are summarized in Table L-2. Uses shall meet the specifications identified in this table as well as the specific policies set forth below.



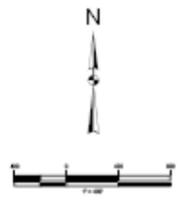
### City of Imperial Beach

#### General Plan/Local Coastal Plan and Zoning Ordinance Land Use Map

- Coastal Zone Boundary
- City Boundary
- Zoning Categories**
- R-1-6000 Single Family Residential
- R-1-3800 Single Family Residential
- R-3000-D Two-Family Detached Residential
- R-3000 Two-Family Residential
- R-2000 Medium Density Residential
- R-1500 High Density Residential
- C/MU-1 General Commercial & Mixed-Use
- C/MU-2 Seacoast Commercial & Mixed-Use
- C/MU-3 Neighborhood Commercial & Mixed-Use
- C/R-ET Commercial/Recreation-Ecotourism Zone
- SMUIRO Seacoast Mixed-Use/Residential Overlay
- PF Public Facility
- OS Open Space
- UR Urban Reserve

#### General Plan/Local Coastal Plan/ Zoning Map amendments

REG. NO.	OFF. NO.	DATE	COASTAL COMMISSION	SEE	CASE
14-402		July 9, 1994	#B-P/AG 01-94/04/02, 1994	237	GPA 98-011 LCFA 98-01
14-404		July 9, 1994	#B-P/AG 01-94/04/02, 1994	237	GPA 98-011 LCFA 98-01
14-403		July 9, 1994	#B-P/AG 01-94/04/02, 1994	237	GPA 98-011 LCFA 98-01
14-405	14-084	July 29, 1994	#B-P/AG 01-94/04/02, 1994	237	GPA 98-011 LCFA 98-01 ZCA 98-03
14-407		Oct 19, 1994	#B-P/AG 01-94/04/02, 1994	239	GPA 98-011 LCFA 98-01
	14-088	Nov 3, 1994	#B-P/AG 01-94/04/02, 1994	247	GPA 98-011 LCFA 98-01 ZCA 98-03
	18-033	June 3, 1998	#B-P/AG 01-98/04/02, 1998	426	GPA LCFA ZCA 98-01
	18-036	June 17, 1998	#B-P/AG 02-98/04/02, 1998	421	GPA LCFA ZCA 98-01/02/03/04
2013-7188		May 3, 2013	#B-P/AG 01-13/04/02, 2013	1024	GPA LCFA 100007 ZCA 100008
2013-7136	2012-1127	May 14, 2013	#B-P/AG 01-13/04/02, 2013	1024	GPA LCFA 100007 ZCA 100008
2013-7136		Aug 1, 2013	#B-P/AG 01-13/04/02, 2013	935	GPA LCFA 100007 ZCA 100007
2013-7188	2012-1128	May 4, 2013	#B-P/AG 01-13/04/02, 2013	1103	GPA LCFA 100007



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### **L-3 Residential Uses and Neighborhoods**

Specific policies for residential uses are:

#### **a. Pedestrian Orientation**

All housing and neighborhoods shall be designed with a pedestrian orientation. This requires:

- Safe and pleasant pedestrian ways with numerous street trees.
- Front doors and windows facing the street whenever feasible.
- Ground level front porches, patios, bay windows and balconies facing the street wherever feasible.
- Minimum front yard set-backs.
- Garages and parking accessed from an alley or set back and recessed behind the front facade of the residential units.

#### **b. Owner Occupancy**

Although both rental and owner-occupied housing shall be provided, the City shall encourage owner-occupancy for all income levels.

#### **c. Single Family/Multi-Family Balance**

The retention and expansion of stable, owner-occupied, single family neighborhoods is essential in order to maintain the goal of a small beach-oriented town. These areas shall be protected from intrusion of traffic and conflicting land uses such as multifamily structures or commercial developments.

#### **d. High Density Residential**

Higher density neighborhoods shall be located near public transportation facilities. Development shall emphasize human scale, aesthetically pleasing buildings with active and passive private and common open space. Areas shall be protected from the intrusion of traffic and conflicting land uses.

### **L-4 Commercial and Mixed-Use Areas**

Specific policies for commercial and mixed-use areas are as follows:

#### **a. Attractive and Stimulating Surroundings**

Commercial and mixed-use areas should be enjoyable places in which to shop and work. This means providing pedestrian scaled design, bicycle facilities, such as racks or storage areas, landscaping of building sites and parking lots, street trees, screening unsightly storage and parking areas and banning out-of-scale advertising. All new commercial developments

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and major expansions of existing commercial uses should be subject to design controls.

**b. Protection of Residential Areas**

All commercial and mixed-use areas should incorporate a sensitive transition to abutting residential uses by means of such techniques as landscape buffering and setbacks, upper-story building stepbacks, viewsheds, and careful control of loading, storage, parking areas, and lighting.

**c. Fostering New Commercial and Mixed-Use Development**

Commercial and mixed-use development should be encouraged to increase the City's tax base, and should be evaluated in terms of the effect it will have on the economy, as well as its compatibility with the existing character and quality of living in the City. Particular emphasis should be placed on the development of new businesses and fostering commercial uses that provide goods and services to residents and visitors.

**d. State Highway 75 General Commercial and Mixed-Use Area (C/MU-1)**

This commercial/mixed-use area requires substantial improvement. It serves as the major gateway to the City and carries more traffic than any other street in the City. It is expected that the area will retain a mix of pedestrian- and automobile-oriented uses; however, as redevelopment occurs, pedestrian-oriented commercial and mixed-use development, including multi-family dwellings, are encouraged.

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**TABLE L-2:  
LAND USE DESIGNATIONS AND SPECIFICATIONS**

**R-1-6000 Single Family Residential (2 stories)**

The R-1-6000 Single Family land use designation provides for the development of low density detached single family dwelling units (including mobile homes), with a minimum lot size of 6,000 sq. ft. per unit. This density will permit as many as 7 units per net acre of land. 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 (2 stories)**

The R-1-3800 Single Family land use designation provides for the development of low density detached single family dwelling units (including mobile homes), with a minimum lot size of 3,800 sq. ft. per unit. This density will permit as many as 11 units per net acre of land. 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 (2 stories)**

The R-3000 Residential land use designation provides for the development of detached and attached single-family dwellings (including mobile homes), with a maximum density of one unit per every 3,000 sq. ft. of land. This designation will permit as many as 14 units per net acre of land. 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. Extensive landscaping and recreational amenity packages should be provided in development of this density.

**R-3000-D Residential (2 stories)**

The same as R-3000, except attached single-family units are not allowed.

**R-2000 Residential (2 stories)**

The R-2000 Residential land use designation provides for the development of detached or attached single family and multi-family dwellings (duplexes, apartments, condominiums, townhomes) with a maximum density of one unit per every 2,000 sq. ft. of land. This designation will permit as many as 21 units per net acre of land. 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. Within the R-2000 area between Seacoast Drive and 4th Street, an additional dwelling unit per lot may be authorized by special permit. The intent of this designation is to provide for a moderately intense residential living environment in typically one and two-story units. Extensive landscaping and recreational amenity packages should be provided in development of this density.

**R-1500 Residential (3 stories)**

The R- 1500 Residential land use designation provides for the development of detached and attached single family and multi-family dwellings (duplexes, apartments, condominiums, townhomes) with a maximum density of one unit per every 1,500 sq. ft. of land. This designation will permit as many as 29 units per net acre of land. 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. Extensive landscaping and recreational amenity packages should be provided in development of this density.

**UR Urban Reserve**

The Urban Reserve land use applies to land, which is currently vacant or may be recycled to another use in the future (i.e., Ream Field and salt ponds). 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 Specific Plan.

**C/MU-1 General Commercial and Mixed-Use (4 stories)**

The General Commercial and Mixed-Use land use designation provides for commercial development, mixed-

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use development, multiple-family dwellings, and businesses 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 the C/MU-1 designation will be community- and neighborhood-serving retail and office uses. Multi-family residential uses may be permitted at a maximum density of 1 unit per every 1,000 sq. ft. of land, per the City of Imperial Beach Zoning Ordinance. For all buildings with frontage along Palm Avenue between 7<sup>th</sup> Street and Florida Street, including those with multiple-family dwelling units, “active commercial uses” are required to be provided at a minimum of sixty percent of each building’s ground floor square footage with direct pedestrian access from the Palm Avenue sidewalk or a plaza. The remaining 40% must either be primarily related to the commercial use, such as parking, access, or other nonactive commercial purpose or, if related to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking.

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**C/MU-2 Seacoast Commercial and Mixed-Use (3 stories, except for hotels, where 4 stories may be permitted by specific plan)**

The C/MU-2 Seacoast Commercial land use designation provides for land to meet the demand for goods and services required primarily by the tourist population, as well as by 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, and hotels and motels. To promote a more pedestrian-oriented community character, as well as to reduce the high volume of vehicle trips attracted by drive-through establishments, drive-through services for restaurants, banks, dry cleaners, and other similar auto-related business establishments shall be prohibited in this zone. Per the City of Imperial Beach Zoning Ordinance, multi-family residential uses shall be permitted at a maximum density of 1 unit per every 1,500 gross sq. ft. of lot area; if located on the east side of Seacoast Drive or on Palm Avenue, east of Seacoast Drive, multi-family residential uses may be increased to a maximum density of 1 unit per every 1,210 gross sq. ft. of lot area, subject to the compliance with specified development incentives and the approval of a conditional use permit. Additionally, the Seacoast Mixed Use/Residential Overlay was established to provide for the future expansion of commercial uses allowed in the C/MU-2 designation while preserving opportunities for the continuation of single-family residential uses within the overlay area. Mixed-use and multi-family residences are permitted in the C/MU-2 area, as well as in the Seacoast Mixed Use/Residential Overlay Zone.

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**C/MU-3 Neighborhood Commercial and Mixed-Use (3 stories)**

The Neighborhood Commercial and Mixed-Use land use designation provides for mixed-use development, multiple-family dwellings, and businesses 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. To maintain and promote a more pedestrian-oriented community character, as well as to reduce the high volume of vehicle trips attracted by drive-through establishments, drive-through services for restaurants, banks, dry cleaners, and other similar auto-related business establishments shall be prohibited in this district. Per the City of Imperial Beach Zoning Ordinance, residential uses shall be permitted at a maximum density of 1 unit per every 1,500 gross sq. ft. of lot area, and may be increased to a maximum density of 1 unit per every 1,210 gross sq. ft. of lot area, subject to the compliance of specified development incentives and the approval of a conditional use permit.

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**Seacoast Mixed-Use/Residential Overlay**

The purpose of the Seacoast Mixed Use/Residential Overlay land use designation is to provide for preserving opportunities for the continuation of single-family residential uses, in the area bounded by Ocean Boulevard (the beach) to the west, Ocean Lane on the east, Imperial Beach Boulevard on the south, and Palm Avenue on the north. In this area, single-family land uses shall be permitted, in addition to all uses permitted within the C/MU-2 designation.

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**PF Public Facility**

The Public Facilities land use designation provides for land devoted to public facilities and utilities. This designation, therefore, includes public schools, parks, the beach and civic facilities. More precise standards and criteria for these land uses are contained in the Facilities and Services Element and the Parks, Recreation, and Access Element.

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**OS Open Space**

The Open Space land use designation applies to land set aside for the protection of sensitive and fragile natural resources. Usage of these areas will be carefully managed. This designation applies to the Tijuana River Valley.

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The City, property owners and businesses should prepare and implement a Specific Plan and or improvement plan for this commercial area. Such plan shall consider but not be limited to:

- Removal of non-conforming signs, such as pole or roof signs
- Creation of a uniform street tree program
- Site landscaping improvements, including screening of loading, storage and parking areas.
- Creating a more pedestrian and transit oriented corridor
- Closing of repetitive or unnecessary curb cuts
- Store front modernization, including the availability of low interest loans or grants
- Joint parking and access between uses
- Creation of a Business Improvement District (BID)
- A variety of potential implementation actions including use of highway and transit funds, CDBG funds or redevelopment
- Business attraction/retention program.

**e. Seacoast Commercial and Mixed-Use (C/MU-2)**

The Seacoast Area shall serve as a commercial and mixed-use visitor-serving, pedestrian-oriented commercial area. Existing residential uses shall be slowly transitioned to new visitor serving commercial uses. To ensure that the existing character is maintained and enhanced, the zoning for this area shall incorporate standards for setbacks and stepbacks, and encourage pedestrian activity through the design and location of building frontages and parking provisions. For all buildings with frontage along Seacoast Drive, including those with multiple-family dwelling units, “active commercial uses” are required to be provided at a minimum sixty percent of each building’s ground floor square footage and have direct pedestrian access from the Seacoast Drive sidewalk or a plaza. The remaining 40% must either be primarily related to the commercial use, such as parking, access, or other nonactive commercial purpose or, if related to non-commercial use, must be designed either to encourage and promote pedestrian activity or to visually screen required on-site parking. Per the City of Imperial Beach Zoning Ordinance, timeshares shall require approval of a conditional use permit and shall be prohibited on the first 1st floor, unless 25% are reserved for overnight accommodation.

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- f. **13th Street Neighborhood Commercial and Mixed-Use Area (C/MU-3)**  
The 13th Street area shall provide areas for pedestrian-oriented commercial and mixed-use businesses that provide goods and services primarily for neighborhood residents.

**L-5 Ream Field Urban Reserve Area**

- a. **Support Closure**  
The City shall encourage the U.S. Government to close Ream Field and release the land for a combination of public and private uses.
- b. **Urban Reserve**  
Ream Field is designated in the Urban Reserve land use designation. Any re-use shall require an amendment of the General Plan and the preparation of a Specific Plan. Such Specific Plan should consider but not be limited to:
- A well-balanced utilization plan designed to increase the City's tax base, employment opportunities and address other City problems.
  - Retention of 606 acres currently part of the Tijuana Slough National Wildlife Refuge to remain under control of the U.S. Fish and Wildlife Service.
  - Retention of the Exchange, Commissary, Child Development Center, Job Corps Center, and Immigration Naturalization Services Center.
  - A public park to serve the southeastern portions of Imperial Beach.
  - A site for the City's public works yard.
  - Businesses, college campus, education park, hotel, housing, light industry, medical facilities, veterans home, secondary school and tourist facilities.
- c. **Planning Funds**  
The City should seek State, Federal or private funding to conduct a re-use study prior to the base closure.
- d. **Interim Uses**  
Prior to a closure of Ream Field, the City should request that the U.S. Government authorize some limited use of Ream Field by the City for either economic development activities or public facilities. The City Council may approve such uses without a modification of the General Plan.

**L-6 Tourist Commercial Uses**

Imperial Beach should provide, enhance and expand tourist commercial uses to the extent that they can be compatible with the small beach oriented town character of the City.

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## **L-7 Revitalization**

The retention of an attractive, human scale, beach oriented small town atmosphere requires a high level of street and property maintenance. The City shall:

- a. Continue and expand the operation of a graffiti removal program to facilitate prompt removal of graffiti on public and private property.
- b. Consider the provision of rehabilitation assistance in residential neighborhoods to eliminate code violations and enable the upgrading of residential properties.
- c. Promote aggressive enforcement of City codes, including building, zoning, and health and safety, to promote building and property maintenance. Particular attention shall be given to removal of illegal uses.
- d. Promote commercial area revitalization through storefront and landscape improvement loan and grant programs.
- e. Examine the potential use of California Community Redevelopment Law
- f. Promote revitalization of the City through the installation of public improvements such as street and alley lighting, undergrounding of utilities, and street, sidewalk, alley, median and landscape improvements.
- g. Establish a goal of paving 100% of the City's alleys through use of assessment districts or other means.
- h. Complete, through the use of assessment districts or other means, the construction of missing sidewalks with high priority to:
  - 4 Streets leading to the beaches.
  - 4 Streets used by children walking to school.
  - 4 Streets that provide good pedestrian access to commercial areas.
- i. Actively pursue grant programs to accomplish the above activities.

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**L-8 Bayfront/Marina**

The Imperial Beach Bayfront area is a very unique and environmentally sensitive area of the South San Diego Bay. Opportunities and constraints for development and access to this area have been the subject of numerous studies, reports and surveys. While the opportunities for full deep-water bay access from the Imperial Beach portion of the bayfront are limited by extensive environmental and economic constraints, the City should:

1. Continue to evaluate opportunities for increased public access to the San Diego Bay, including a marina or other commercial recreational marina alternatives, giving full consideration to the environmental and economic constraints applicable to that area.
2. Insure continued public access to the Imperial Beach Bayfront area and, where possible, provide for additional public access.
3. Create a recreational corridor along the Imperial Beach Bayfront incorporating bicycle and pedestrian paths.

**L-9 Lower Cost Visitor and Recreational Facilities**

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred. (*Amended by Resolution 2003-5754 on April 2, 2003*)

# NOISE ELEMENT

*Nothing marks the change from the city to the country so much as the absence of grinding noises. The country is never silent. But its sounds are separate, distinct, and, as it were, articulate.*

*Henry Ward Beecher*

## BACKGROUND

The Noise Element is a required element under the California Planning Law.

There is general agreement that the average urban noise levels are continuing to climb and now constitute a serious detraction from the quality of life in many cities. For most people, the usual consequences of noise are associated with an interference with speech and other communication, a distraction at home and on the job, the disturbance of rest and sleep, and the disruption of various recreational pursuits. All of the foregoing can be considered components of the quality of life. Beyond the level of such inconveniences or disruptions, extreme and prolonged noise levels can cause hearing loss (either temporary or permanent), aural pain, nausea, loss of muscular control and blurring of vision. The effects of noise are therefore, widespread and include both psychological and sociological effects, as well as physiological effects.

Although many of the findings related to noise lend themselves to a variety of interpretations, there is general agreement on a number of factors:

1. Noises of sufficient intensity have caused irreversible hearing damage.
2. Noises have produced physiological changes in humans and animals that in many instances have not resulted in adaptation.
3. The effects of noise are cumulative and, therefore, the levels and duration of noise exposure must be taken into account in any overall evaluation. The recognition of this fact has been translated into legislation specifying limits of total permissible noise exposure in various urban settings.
4. Noises can interfere with speech and other communication.
5. Noises can be a major source of annoyance by disturbing sleep, rest and

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relaxation, thereby resulting in stress.

6. When community noise levels have reached sufficient intensity, social action has occurred to reduce their effects. This has often taken the form of creating new organizations (or using existing ones) to press for regulation by means of laws, ordinances and standards and is one of the primary reasons why a Noise Element is mandated by the State.

In order to determine the existing noise environment in Imperial Beach, a noise study was conducted in January 1994. A technical report on noise findings is included as an appendix to the General Plan.

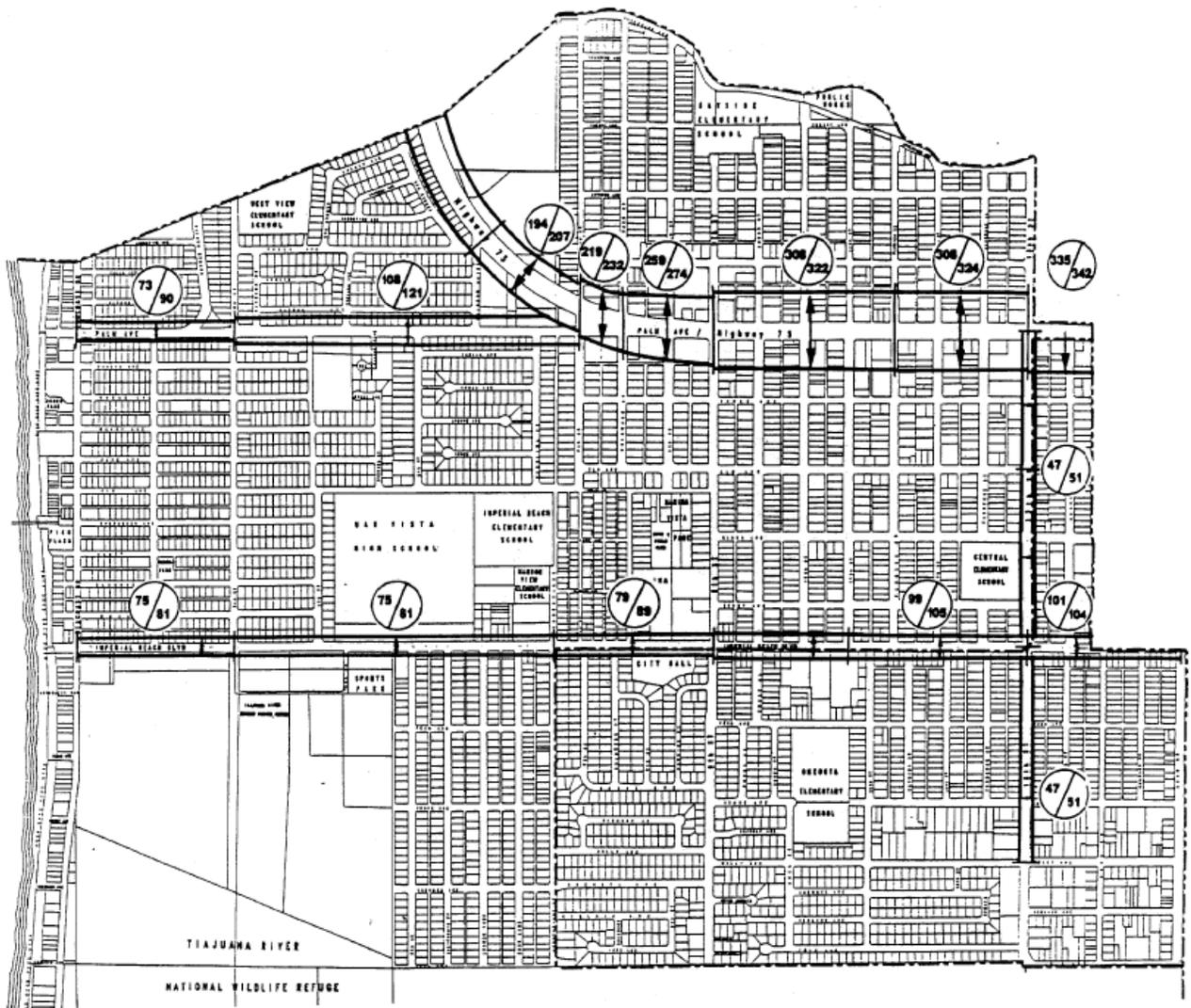
Noise is generally measured in decibels (dB), which is a scale used to quantify sound intensity. Additionally, since the human ear is not equally sensitive to all sound frequencies, human response is factored in by a process called "A-weighting" written as dB(A).

State law requires a Community Noise Equivalent Level (CNEL). All habitable rooms including hotel/motel rooms must meet an interior CNEL of 45 dB(A). A 65 dB CNEL exterior noise exposure generally allows the criteria standard to be met as long as windows can normally be closed to shut out the noise.

Imperial Beach has three primary sources of noise. The main source of noise consists of traffic on the City's arterial streets. The existing and projected CNEL at the 65 dB level is shown in Figure N-1 for SR-75, Palm Avenue, Imperial Beach Boulevard and 13th Street. The distance from the centerline of the streets to the 65 dB CNEL line is projected to increase between 3 to 17 feet at build out under the 1994 General Plan. The distance to the 65 dB CNEL for all other streets is less than 50 ft. from the street centerline and are not shown due to the lack of accuracy, predictability and impact.

A second source of noise consists of helicopter activity from Ream Field. The activity level of the helicopters varies considerably from day to day. Figure N-2 shows the noise conditions for 1988. Additionally, the Figure shows an up-dated 65 dB CNEL line based on a 1992 study. Adverse helicopter noise impacts the South Seacoast, Tijuana Estuary, Seaside Point and Oneonta neighborhoods.

The third source of noise comes from temporary construction including demolition of existing pavement, earth moving equipment and finish construction. Heavy equipment noises range from 72 to 90 dB(A) at 50 feet from the source.



**LEGEND**

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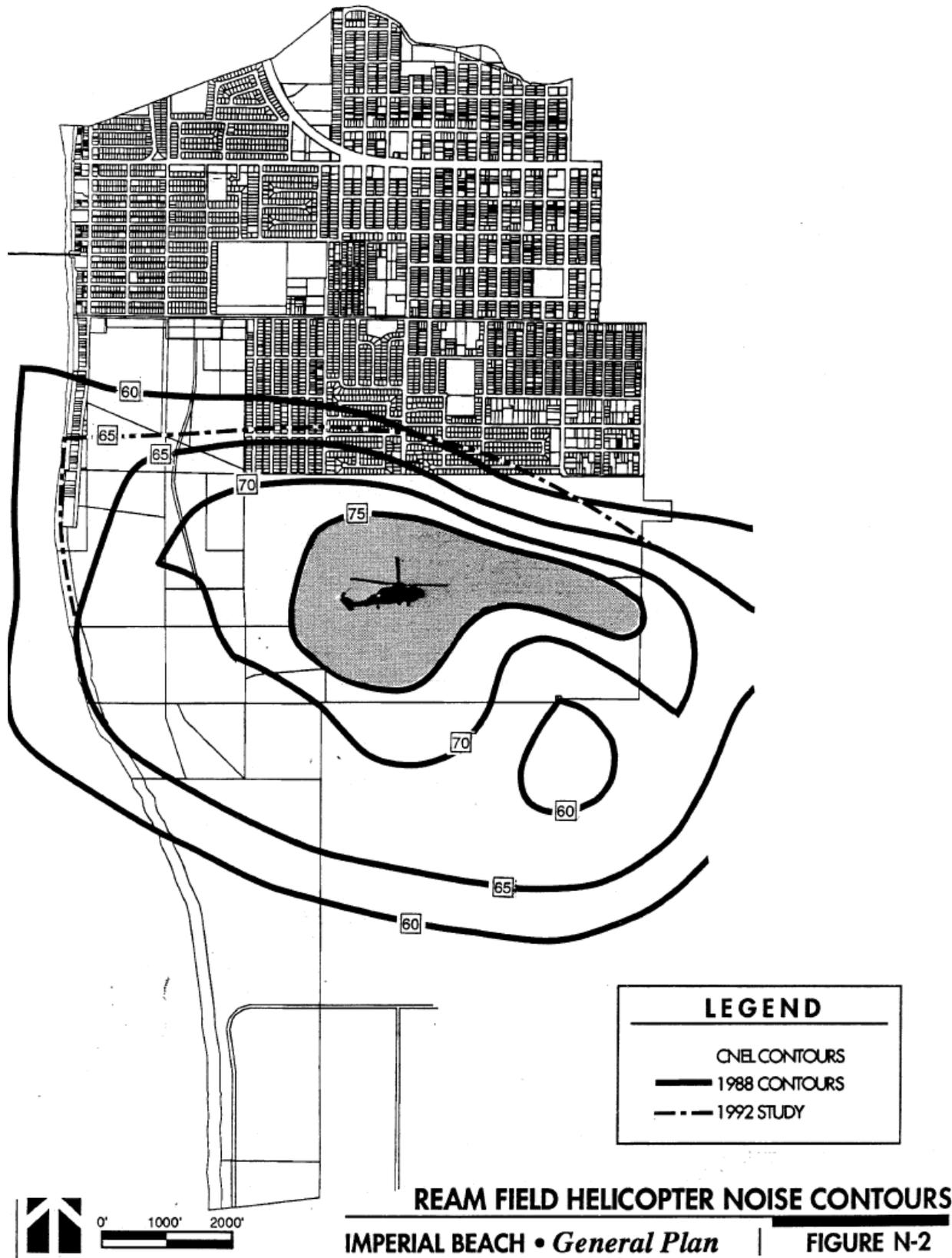
 EXISTING DISTANCE FROM CENTER LINE OF ROAD TO 65dB CNEL  
 PROJECTED DISTANCE FROM CENTER LINE OF ROAD TO 65dB CNEL WITH PLAN BUILD OUT



**EXISTING & PROJECTED 65dB CNEL NOISE CONTOURS**

**IMPERIAL BEACH • *General Plan***

**FIGURE N-1**



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# GOAL

## GOAL 12 EXCESSIVE NOISE

It is the intent of the City to regulate and control unnecessary excessive and annoying sounds and vibrations emanating from uses and activities within the City, and to prohibit such sounds and vibrations as are detrimental to the public health, welfare and safety of its residents.

## POLICIES

### N-1 Noise Ordinance

The City shall develop and adopt an ordinance to control noise levels. The ordinance shall set forth specific noise levels (dB meter readings) that are unacceptable and not permitted in the City.

### N-2 Commercial Vehicles

The City shall establish regulations limiting the routes, speeds, and operating hours of vehicles generating noise nuisance such as trucks and buses. Trucks over 5000 lbs. load capacity should be limited to Highway 75, unless they are making deliveries. (See also Circulation Element, Policy C-8.)

### N-3 Public Events

The City should require organizations to submit plans and obtain permits to hold public events in the City. There should be controls placed upon the scheduled start and completion times and the use of noise producing devices such as public address systems and musical amplifiers.

### N-4 Complaint Center

A formal complaint center should handle noise complaints. There should be periodic advertising of the noise ordinances and its requirements and encouragement of the public to register complaints.

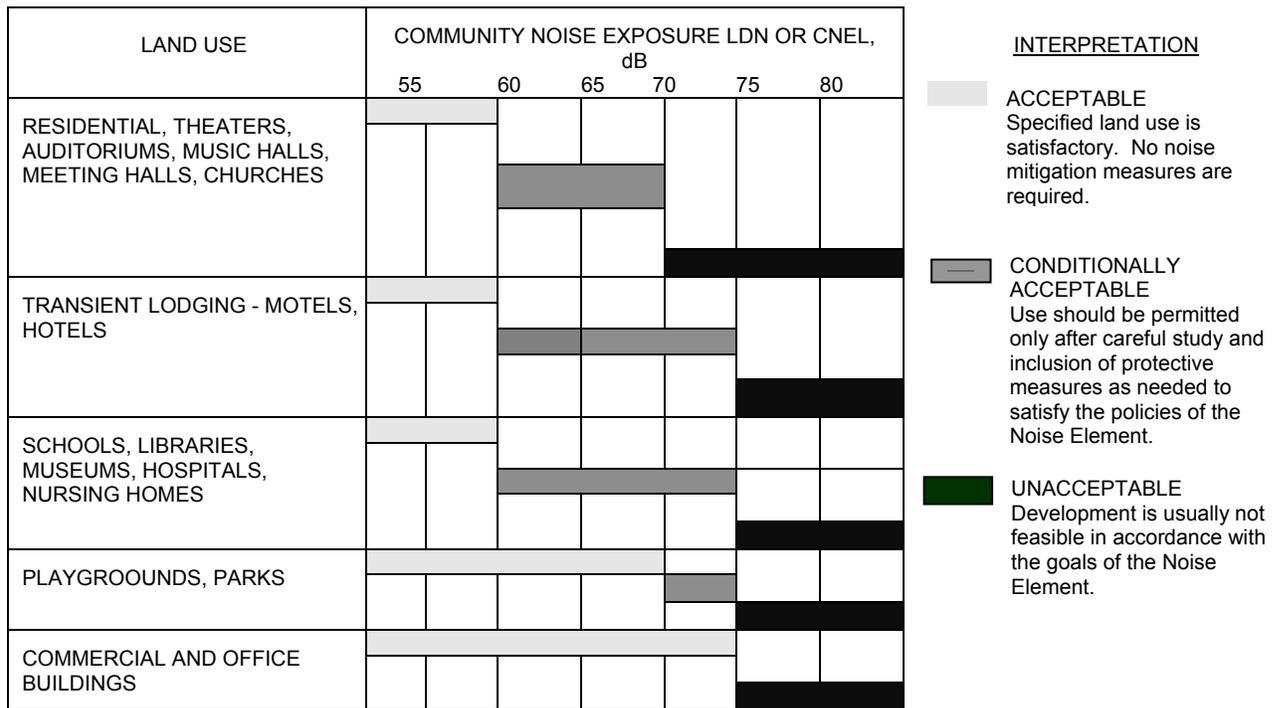
### N-5 Land Use Compatibility-Transportation

The City shall require all new development to meet the exterior noise requirements of the compatibility guidelines shown in Figure N-3.



For areas where the noise environment is conditionally acceptable for a particular land use, development shall be allowed only after noise mitigation has been incorporated into the design of the project to reduce noise levels. For areas where the noise environment is unacceptable for the development of a given use, development is usually not appropriate and shall be allowed only upon the completion of an environmental impact report and the adoption of a statement of overriding social-economic impact.

**FIGURE N-3  
LAND USE COMPATIBILITY GUIDELINES FOR DEVELOPMENT**



**N-6 Technical Reference Manual**

To meet the requirements of the Government Code regarding technical information to be included in the Noise Element, the Noise Impact Study is herein adopted by reference and included in the Appendix to the General Plan.

*There isn't much to be seen in a little town, but what you hear makes up for it.*

*Elbert Hubbard*

# PARKS, RECREATION, AND ACCESS ELEMENT

*Park and recreation standards serve as one of the bench marks against which the quality of life within a community can be measured.*

*Roger A. Lancaster  
Director of Research & Project Coordinator  
National Recreation and Park Association*

## BACKGROUND

The Parks and Recreation Element is an optional element of the General Plan, while the Access Element is required by the California Coastal Act. The entire topic should be viewed in the context of the background, principles and policies found in the Conservation and Open Space Element.

The City of Imperial Beach owns and maintains approximately 14.74 acres of park land in four sites consisting of Sports Park, Ream Park, Triangle Park and Marina Vista Park. The recreational programs within these parks are operated by the Imperial Beach Boys and Girls Club. In addition to City parks, the following recreational facilities are located within the City limits: Border Field State Park, the City Beach, the Imperial Beach Boys and Girls Club, the Mar Vista High School's athletic fields and tennis courts, Pier Plaza, Tijuana River Estuary Visitor Center and related trails, and the playgrounds of six elementary schools. Other recreational facilities include Marina Vista Center, the Senior's Center and the Conference Center located in the Civic Center complex.

Imperial Beach operates its own lifeguard services which are part of the Public Safety Department. The staff consists of one permanent (year-round) employee, and approximately twelve seasonal/recurrent lifeguards that work primarily during the summer months. During unusually hot weekends and/or holidays as necessary, a number of lifeguards may be recalled to provide adequate lifeguard coverage. During the rest of the year the lifeguard headquarters is manned by at least one lifeguard on a daily basis. In addition to the protection of the beaches, the lifeguards also provide coverage for the two 25-yard pools at Marina Vista High School that are open to the public during the summer months. Because of increased usage of the Imperial Beach beaches, it can be expected that additional personnel may be required in the future.

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The City's park and recreation facilities are listed on Table P- I and mapped on Figure P-1. Each facility is described below.

### **Border Field State Park**

This State park is located adjacent to Mexico generally within the City limits of Imperial Beach. The Tijuana Estuary separates the park from the populated areas of the City. The only vehicular access to the park is via Monument Road through the City of San Diego. The facility is devoted to passive recreation such as picnicking, hiking, walking along the beach, swimming in the ocean and horseback riding.

### **Dunes Park**

This proposed .73-acre park is located four blocks north of Pier Plaza between the beach and Seacoast Drive. Improvements to this park land are to be provided by the San Diego Unified Port District. The preliminary design for the park includes volleyball courts, horseshoe pits, grassy areas, play ground equipment and an arbor for picnicking. The Port District has tentatively set park construction to begin in the FY 94-95. The City, in cooperation with the Port District is also pursuing the possible addition of land to expand Dunes Park.

### **Elementary Schools Play Fields**

The school district's policy is to permit the public to use the school grounds in the evenings and on the weekends when school is not in session. The elementary school sites have the following facilities: volleyball and basketball courts, one or two soccer/baseball fields and play equipment i.e., swings and slides. In addition, Bayside Elementary School has one wallboard court and a running track with work-out stations. Harbor View and West View Elementary Schools have running tracks and Central has two wallboard courts.

The City of Imperial Beach has a joint use agreement with the South Bay Union Elementary School District. The agreement allows the City to use the facilities at Bayside, Central, Harbor View, Imperial Beach, Oneonta, and West View Elementary Schools for recreational purposes. The Boys and Girls Club offers after school programs on all six of the District's school sites in Imperial Beach. See Table P-1 for the athletic and recreational facilities located on the schools sites.

### **Imperial Beach Boys and Girls Club**

This 1.7-acre recreational facility is located on City Property and is bounded on two sides by Marina Vista Park. In addition to the large recreational building, there is one lighted softball field, and one basketball court on the site. Programs offered include arts and crafts, athletics, social recreation, and youth group programs. In order to participate in the Club's program, members must be between 7 and 17 years old, and pay an annual fee of \$10. In 1993, the organization had 1,245 members. This program receives no financial support from the City.

### **Mar Vista High School**

Approximately 20 acres of the 33-acre school site is devoted to outdoor recreation.

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Facilities include a football field and track, outdoor swimming 2 pool, 4 tennis courts, and baseball/soccer fields. As of 1993 the City did not have a joint use agreement with the Sweetwater Union High School District. In the past, the City used the swimming pool during the summer months. During the summer of 1993, the pool was not used as it was being refurbished. There is no arrangement to use the pool for recreational purpose at this time. However, the community does use the tennis courts, basketball courts and athletic fields when they are not in use by the school.

### **Marina Vista Park**

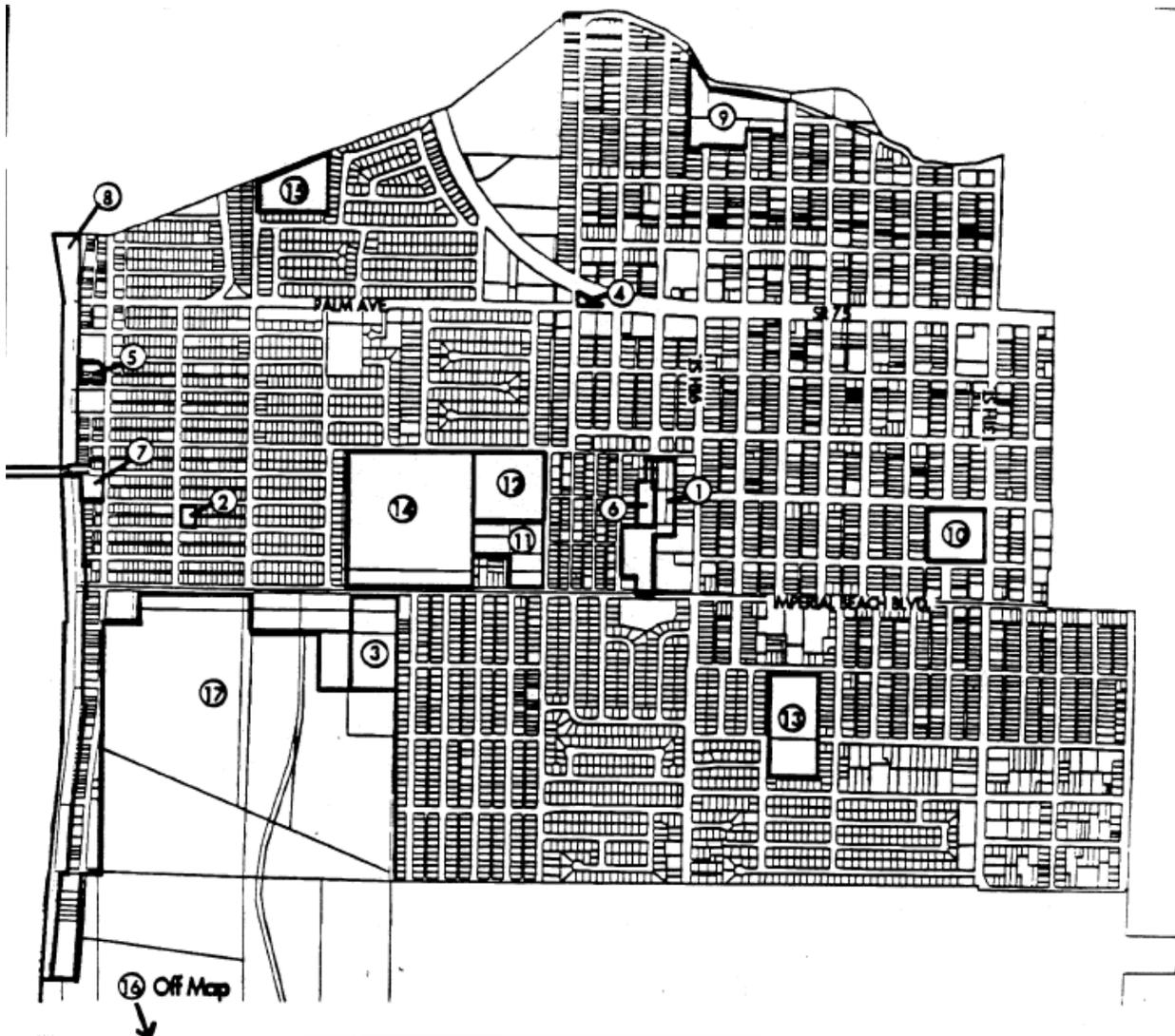
This centrally located 6.69-acre city park includes a picnic area, very large (passive) grass play areas, children's playground, bandstand/gazebo, and a community center with kitchen and restrooms. Adjacent to the park is the Boys and Girls Club facility (on City land) and the Senior Center. With modification of the grassy play area, there would be space available for additional active recreational facilities, if desired.

### **Pier Plaza, Pier and City Beach**

Imperial Beach has a total of 3.5 miles of beach frontage. The Imperial Beach Fishing Pier and the City Beach accounts for an additional 12.36 acres of recreational area within the City limits (2.56-acre Pier and Pier Plaza area, and, excluding the estuary, 9.8 acres of sandy beach). Unfortunately, in the recent past, the ocean, with its related sandy beach front, has periodically been contaminated by sewage spills from Mexico.

The San Diego Unified Port District has assumed financial responsibility for Pier Plaza and the City Beach. Lifeguards are funded by the Port District, but hired by the City to patrol the beach year-round. The level of supervision varies depending on the season.

<b>TABLE P-1</b>			
<b>Park and Recreation Facilities</b>			
<b>CITY OF IMPERIAL BEACH PARK LAND</b>			
<b>Name</b>	<b>Acres</b>	<b>Type</b>	<b>Facilities</b>
1. Marina Vista Park	6.69	Community	Picnic, grass area, gazebo, community center, children's playground
2. Reama Park	.72	Mini	Tot lot, picnic, grass area
3. Sports Park	7.80	Community	Gym, picnic, 6 ball fields, tot lot, grass area, basketball court
4. Triangle Park	.40	Pocket	Grass area
	15.64		
<b>OTHER PARK AND RECREATION FACILITIES</b>			
5. Dunes Park	.73	Regional	Volleyball, horseshoe, picnicking, children's playground
6. IB Boys & Girls Club	1.70	Community	Recreation building, baseball field, basketball court
7. Pier Plaza & Pier	2.56	Regional	Fishing, picnicking, benches
8. Sandy Beach	9.80	Regional	Beach (South end of Seacoast Drive to Northern City Limits)
	14.79		
<b>SCHOOLS (Park and Recreation Acreage only)</b>			
9. Bayside School	7.7	Neighborhood	Mini-park, 2 baseball fields, basketball, volleyball & wall board courts, running track, play equipment
10. Central School	3.1	Neighborhood	2 baseball fields, basketball, volleyball and 2 wall board courts, play equipment
11. Harbor View School	3.4	Neighborhood	Soccer/baseball field, basketball and volleyball courts, play equipment
12. Imp. Beach School	2.7	Neighborhood	Soccer/baseball field, basketball and volleyball courts, play equipment
13. Oneonta School	7.6	Neighborhood	2 soccer/baseball fields, baseball and volleyball courts, play equipment
14. Mar Vista High	20.0	Community	Basketball, 4 tennis courts, football field, running track, swimming pool, baseball soccer
15. West View School	4.5	Neighborhood	Mini-park, baseball fields, baseball, volleyball & wall board courts, play equipment
	49.0		
<b>REGIONAL FACILITIES (within City Limits)</b>			
16. Border Field State Park	317.0	Regional	Picnic, beach, hiking and horseback trails
17. Tijuana River National Estuarine Research Reserve (outside of Border Field State Park)	611.0	Regional	Visitor center, trails
	928.0		



<u>City of Imperial Beach Park Land</u>		<u>Schools</u>	
	<u>Acres</u>		<u>Acres</u>
1. Marina Vista Park	6.69	9. Bayside School	7.7
2. Rearna Park	0.72	10. Central School	3.1
3. Sports Park	7.80	11. Harbor View School	3.4
4. Triangle Park	0.4	12. Imperial Beach School	2.7
<b>TOTAL</b>	<b>15.64</b>	13. Oneonta School	7.6
 		14. Mar Vista High	20.0
<u>Other Park and Recreation Facilities</u>		15. West View School	4.5
5. Dunes Park	0.73	<b>TOTAL</b>	<b>49.0</b>
6. B Boys and Girls Club	1.7	 	
7. Pier Plaza and Pier	2.56	<u>Regional Facilities (within City Limit)</u>	
8. Sandy Beach	9.8	16. Border Field State Park	317.0
<b>TOTAL</b>	<b>14.79</b>	17. Tijuana River National Estuarine Research Reserve (outside of Border Field State Park)	611.0
		<b>TOTAL</b>	<b>928.0</b>

**PARK AND RECREATION FACILITIES**

IMPERIAL BEACH • *General Plan* | **FIGURE P-1**

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### Reama Park

This small neighborhood park of approximately 0.72 acres is located on Second Street between Elkwood and Elder Avenues. Facilities include a children's playground, picnic area and passive grass area. No organized recreational programs occur at this location.



### Sports Park

This fully developed 7.8-acre park and recreation center is located at 425 Imperial Beach Boulevard. Facilities include:

gymnasium and indoor recreation facilities, picnic areas, six fully lighted ball fields, children's playground, an outdoor basketball court, a large (passive) grass play area and restrooms. The two T-ball fields on the southern edge of the Sports Park are located on Tijuana Estuary property. The Boys and Girls Club's recreational program which is operated from this facility includes dance lessons, softball leagues and organized activities for the Boys and Girls Club.



### Tijuana Slough National Wildlife Refuge and Tijuana Estuary Visitor Center

The Wildlife Refuge is operated by the U.S. Fish and Wildlife Service. It provides four miles of trails through uplands, saltmarsh and mudflats as well as access to the beach. Located next to one of the four entrances to the Refuge is the Visitor Center at 301 Caspian Way. Its 6,800 square feet provide for an exhibit hall, education laboratory, audio/visual room, administrative offices, reference library and map and photo library.

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The California Department of Parks and Recreation manages the Visitor Center and, as does the Fish and Wildlife service, depends heavily on volunteer help for operations.

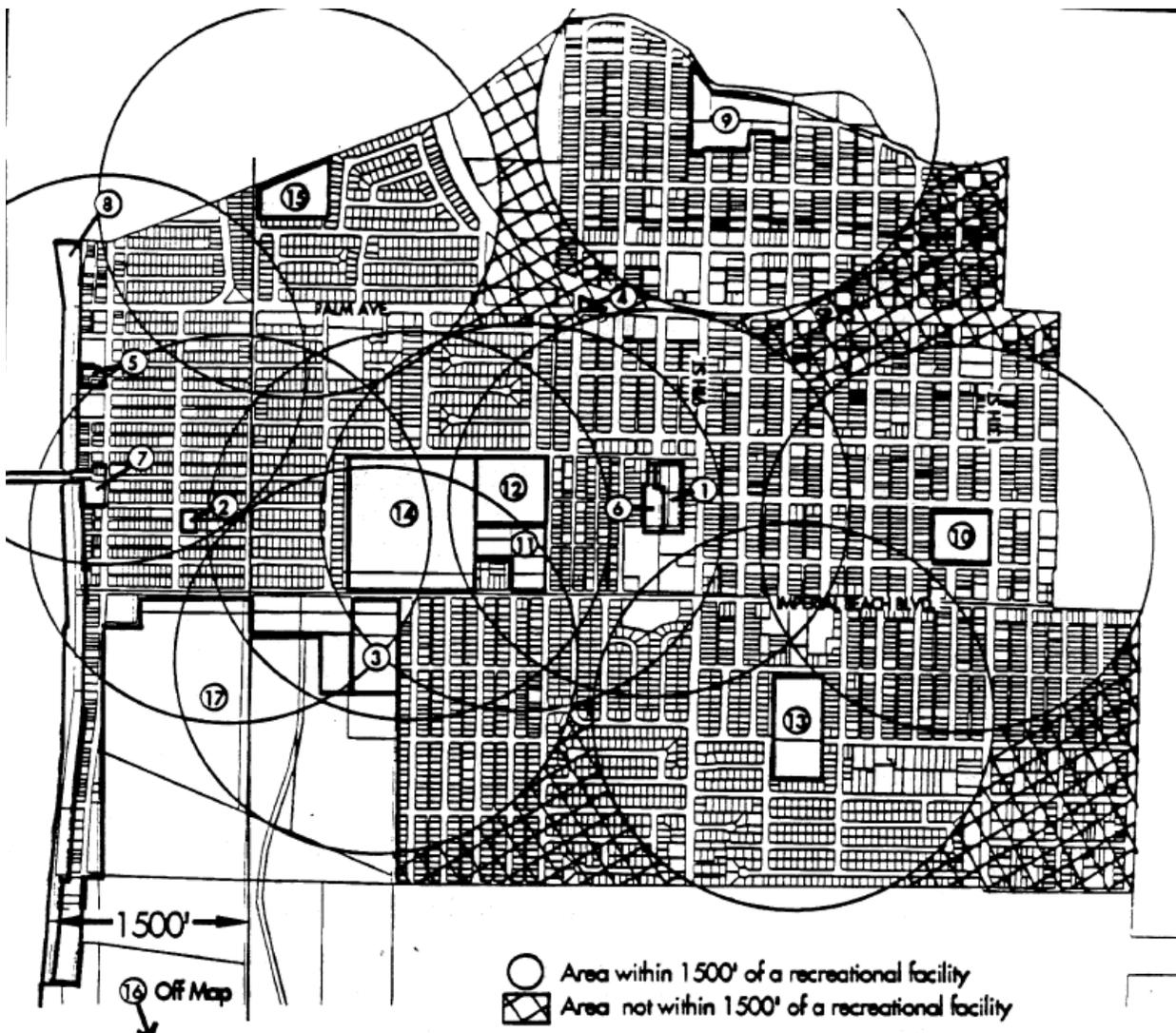


### **Triangle Park**

This 0.4-acre pocket-size park is located in the public right-of-way where Highway 75, Palm Avenue, and 7th Street meet. This grassy area has no permanent improvements other than landscaping.

Based on a walking distance of 1,500 feet, the areas of the City most in need of additional parks are the northeast and southeast areas of the City (see Figure P-2). The National Recreation and Park Association recommends 6 to 10 acres of park land per 1,000 population. All of the City's park land, including school sites, and the beach, but excluding the estuary and State park, total approximately 79.43 acres. If the 1990 population figure of 26,512 is utilized, attainment of the N.R.P.A. minimum standard would require the acquisition of an additional 79.64 acres of park land. This is not an attainable standard for Imperial Beach. Insufficient developable vacant land exists within the City limits. In addition, the City's economic constraints limits its ability to purchase additional park land and to maintain and operate new facilities. Fortunately, many of the citizenry needs are being accommodated due to the joint use agreement between the City and the Elementary School District. The existence of two State parks in the immediate area (Border Field and Silver Strand) and the Tijuana River National Estuarine Research Reserve also helps to alleviate the strain on recreational facilities.

The development and improvement of parks in the City is paid for by the City's Residential Construction Fee and the use of Community Development Block Grant Funds. The Residential Construction Fee (\$800/du + \$100/bd for new construction or \$200/bd for room additions) is collected when building permits are issued. The fee is allocated exclusively for park development.



City of Imperial Beach Park Land		Schools	
	Acres		Acres
1. Marina Vista Park	6.69	9. Bayside School	7.7
2. Reama Park	0.72	10. Central School	3.1
3. Sports Park	7.80	11. Harbor View School	3.4
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<b>TOTAL</b>	<b>15.64</b>	13. Oneonta School	7.6
<b>Other Park and Recreation Facilities</b>		14. Mar Vista High	20.0
5. Dunes Park	0.73	15. West View School	4.5
6. B Boys and Girls Club	1.7	<b>TOTAL</b>	<b>49.0</b>
7. Pier Plaza and Pier	2.56	<b>Regional Facilities (within City Limit)</b>	
8. Sandy Beach	9.8	16. Border Field State Park	317.0
<b>TOTAL</b>	<b>14.79</b>	17. Tijuana River National Estuarine Research Reserve (outside of Border Field State Park)	611.0
		<b>TOTAL</b>	<b>928.0</b>

**1500' WALKING DISTANCE FROM CITY PARKS & SCHOOLS**  
**IMPERIAL BEACH • General Plan | FIGURE P-2**

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# GOALS

## **GOAL 13 THE CITY SHALL PROVIDE ADEQUATE PARKS AND RECREATION AMENITIES FOR A HEALTHY ENVIRONMENT AND QUALITY OF LIFE**

The preservation and development of park, recreation programs and coastal access facilities are considered vital to:

- a. Reinforcing the City's goal of maintaining a small beach-oriented town.
- b. Making the City an enjoyable and beautiful place to live, work, play and visit.
- c. Providing park and recreation amenities for residents and visitors.
- d. Maintaining a balanced healthy environment and quality of life for residents and visitors.
- e. Supporting the area's economy.

# POLICIES

## **P-1 Opportunities For All Ages, Incomes, and Life Styles**

To fully utilize the natural advantages of Imperial Beach's location and climate, a variety of park and recreational opportunities for residents and visitors shall be provided for all ages, incomes and life styles.

This means that:

- a. The beach shall be free to the public.
- b. Recreational needs of children, teens, adults, persons with disabilities, elderly, visitors and others shall be accommodated to the extent resources and feasibility permit.
- c. City residents need mini-parks, neighborhood parks, community parks, activity centers, special use and all-purpose parks.
- d. The City should pursue increased recreational opportunities for the general public in the Tijuana Estuary, Borderfield State Park, the beach and the South San Diego Bayfront.

## **P-2 Ocean and Beach Are The Principal Resources**

The ocean, beach and their environment are, and should continue to be, the principal

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recreation and visitor-serving feature in Imperial Beach. Oceanfront land shall be used for recreational and recreation-related uses whenever feasible.

**P-3 Joint School/Park Sites**

The City shall increase coordination with the school districts to maximize use of school and City facilities for park and recreational purposes. Parks should be developed in conjunction with schools wherever possible. The City shall negotiate joint agreements with the school districts to cooperatively maximize park and recreation opportunities.

**P-4 Private Sector Open Space, Parks and Recreation**

The City shall recognize the contribution of the private sector to parks and recreation and encourage cooperative continuation and expansion of such contributions.

**P-5 Recreation Programs**

Recreation programs to meet the needs of citizens and visitors shall be developed. These needs should be continuously monitored and programs adjusted as necessary over time. Cooperative programs with city residents, business people, neighboring cities, County, State and Federal agencies shall be established to expand the City's recreational programs.

**P-6 Design of Visitor and Recreational Facilities**

The City should research and adopt, following extensive public discussion, a detailed and comprehensive set of design criteria for the beach area in order to increase its attractiveness as a significant recreational resource. The Design Element contains interim design policies which should be implemented at the earliest possible date followed by more detailed and refined design guidelines as they are developed. Such guidelines can be implemented through the auspices of a special zoning district, guidelines adopted by City Council resolution, through a Specific Plan, or a combination of these and other public policy vehicles.

**P-7 Increase Tourist Related Commercial Land Uses**

The City and its business community should take direct action to increase the amount of tourist-oriented businesses both along the beachfront, South San Diego Bayfront and inland areas.

**P-8 Bayfront Park**

The City shall pursue the creation of a linear park along the entire City bayfront. Said park shall consider facilities like walkways, bike trails, grass areas, rest areas with benches and tables, promenade bridge over the Otay River Channel, amphitheater for special events, gazebo, information center, etc.

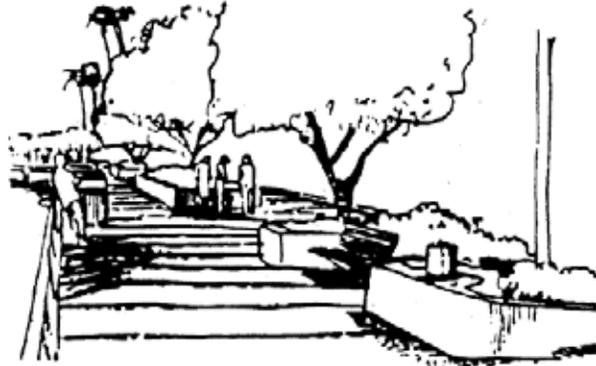
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FIGURE P-3  
BAYFRONT PARK



Linear Parkway with Recreational Trails at the Edge of the Bay.



Boardwalk/Promenade along the Bay Edge.

**P-9 New Park Land**

The City shall pursue expansion of its park and recreation programs. Options to be considered shall include but not be limited to:

- a. The construction of a new public park on Ream Field.
- b. The joint use of the Navy Radio Station as a recreation/open space resource.
- c. Continue development and possible expansion of Dunes Park.
- d. Working with the City of San Diego on the possible creation of a joint two-city neighborhood park to serve the southeast section of the City. A possible site is located on the east side of 15th at the end of Holly Avenue.
- e. Exploring the possibility of acquiring a small park site on 14th Street at the southwest corner of Imperial Beach Boulevard and 14th Street.
- f. Encouraging the school districts to expand the school sites as property may become available.
- g. A park at the northwest corner of Silver Strand and Carnation Avenue.
- h. A public park in the northeast section of the City.

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# SHORELINE ACCESS

## BACKGROUND

The public's right of access to the State's navigable waters is protected by the California Constitution, which states: "No individual, partnership or corporation, claiming or possessing the frontage for tidelands of a harbor, bay inlet, estuary, or other navigable water in this State, shall be permitted to exclude the right-of-way to such water whenever it is required for any public purpose, not to destroy or obstruct the free navigation of such water, and the Legislature shall enact such laws as will give the most liberal construction to this provision, so that access to the navigable waters of this State shall be always attainable for the people."

The desire of the voters of the State of California to protect and enforce the right of public access to the coast was demonstrated by the passage of Proposition 20 in 1972. The 1972 California Coastal Act regulations require that a coastal plan include "a public access element for maximum visual and physical use and enjoyment of the coastal zone by the public" and each local government to prepare a specific public access component. The Coastal Act policies which are related to shoreline access are as follows:

**Section 30210.** Requires maximum access and broad recreational opportunities for all people in beach and coastal areas.

**Section 30211.** Requires that new development not interfere with the public's right of access to coastal areas.

The City of Imperial Beach has more available shoreline than do most other California coastal cities. Of the 17,600 feet of shoreline, approximately 12,000 feet or 68% is either publicly owned or has direct vertical or lateral access. This includes 6,000 linear feet of sandy beach owned fee simple by the State of California within the Borderfield State Park in the extreme southwest corner of the City.

For the purposes of public access, the beach area can be divided into five resource areas. These resource areas are:

- 4 Imperial Beach City Beach
- 4 Imperial Beach Fishing Pier
- 4 Tijuana River Estuary
- 4 Borderfield State Park
- 4 Tidelands

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### **City Beach**

The City Beach is the open sandy beach area both north and south of the city pier. The beach is accessible from the Pier Plaza parking lot and has wide vertical access points for easy egress and ingress to the beach and ocean. The entire City Beach area is subject to daylight lifeguard surveillance.

### **Imperial Beach Fishing Pier**

The City pier is one of Imperial Beach's main visitor serving and recreational facilities. The pier was reconstructed in 1987 and is approximately 30 feet wide and 1,500 feet long and is used for both sightseeing and off-pier fishing. Lights on the pier allow for visitor and fishing uses at night.

As the owner of the pier, the San Diego Unified Port District may in the future add charter boat fishing and restaurant concessions to the pier, but as of January 1994 the Port District's Master Plan does not include any development on the pier or on any of the other areas currently owned or leased by the Port District.

### **Tijuana River Estuary**

The Tijuana River Natural Estuarine Research Reserve (TRNERR) as shown in Figure CO-1, is located in the southwestern most corner of the United States. It represents about 2,531 acres in the lower sections of the Tijuana River watershed. Approximately 928 acres are located within the City limits of Imperial Beach. The remaining acreage is within the jurisdiction of the City of San Diego. The TRNERR Management Authority is vested with the responsibility for setting management policies for the whole Reserve. TRNERR includes the Tijuana Slough National Wildlife Refuge, which is managed by the U. S. Fish and Wildlife Service, and Border Field State Park, which is managed by the California Department of Parks and Recreation. In addition to the Wildlife Refuge and the State Park, the TRNERR boundary also contains land owned by the U.S. Navy, the City of San Diego, the County of San Diego and privately held parcels.

The access-ways of the Tijuana River Estuary are of the Pass and Repass classification. Due to the characteristics of the estuary and slough area, both State and Federal management agencies have limited access to the area in order to protect the fragile ecosystem.

At the east side of the estuary, the California Department of Parks and Recreation have built a staffed estuary visitors center. The center is used to educate the public about biological resources and to encourage public observations. The visitor center is open several days a week for public convenience.

### **Border Field State Park**

Located at the southern end of the City, the State operated park comprises approximately 396.43 acres., with 317.0 acres located within Imperial Beach. Three hundred seventy-two acres of the park, formerly Border Field Naval Facility, is operated by the State Department of Parks and Recreation. This property includes the lagoon

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and salt marshes, about 30 acres of steep slopes at the edge of the floodplain, and about 10 acres of flat plateaus overlooking the floodplain and beach.

The park is accessed through Monument Road, which runs through the City of San Diego. Monument Road is a two-lane road in poor condition and subject to flooding.

Within the park, beach access is provided in several locations:

1. **Beach Access.** Direct vertical active access to the beach is provided via the parking area on the coastal strand directly adjacent to the beach. Additionally, a lateral passive access-way exists along the beach.
2. **Monument Mesa Access.** Access to the mesa area is in the active classification. No direct access to the beach from the mesa exists due to the bluff top topography of the area. An active access-way does however exist along the top of the mesa.
3. Beach access is supported by a 280-car parking lot, picnic sites, restrooms, and a historical monument on Monument Mesa and a parking area at a horse staging area.

The park also includes horse-riding trails, which traverse through the Tijuana River Valley to the Pacific Ocean and a large picnic area on a bluff overlooking the Pacific Ocean. The park is landscaped for walking and light sports activities and contains tables and benches for those wishing to have a picnic. There is a 10-foot paved walkway from the picnic area down the bluff to the beaches.

### **Tidelands-San Diego Unified Port District**

The San Diego Unified Port District owns the Imperial Beach tidelands (which is defined as the distance from mean high tide to a point in the submerged lands of the Pacific Ocean), and the Imperial Beach Pier. The Port District leases from the City all of Ocean Boulevard (paper street on the beach) from the north end of the City to a point 300 feet below the end of South Seacoast Drive. The Port District provides for lifeguard and police protection for the beach and is responsible for all uses and activities in the tidelands area. As of January 1994, the Port District has not amended its Master Plan to include the lands the Port District owns in Imperial Beach.

Other property in the City of Imperial Beach, which is leased (as opposed to owned) by the Port District include Dunes Park, Pier Plaza and easements over the Imperial Beach Boulevard and Palm Avenue street ends.

Access to City beaches is provided via public transit and public streets. The beach is located approximately five miles east of Interstate 5, a major regional freeway, and a mile south and west of Hwy 75, a state highway bisecting Imperial Beach as it passes from the City of Coronado to the City of San Diego. Access to the City of Imperial Beach from Interstate 5 is taken from either Palm Avenue, or from the Coronado

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Avenue/Imperial Beach Boulevard corridors. Imperial Beach is served by the Metropolitan Transit District, which provides bus service to the area, as well as a bike path which runs along the strand from Coronado to the South San Diego Bayfront in Imperial Beach. (See Circulation Element.)

**Lateral and Vertical Access:** The Coastal Commission Shoreline Access Interpretive Guidelines define "lateral access" as a way of providing public access and use along the shoreline. Lateral access in Imperial Beach consists of Ocean Boulevard and usable areas of the City's dry sandy beach, which fluctuates in size with daily, monthly, and seasonal tidal activity. Vertical access is defined as access from the first public roadway to the shoreline. Table P-2 indicates all points of vertical and lateral access in the City of Imperial Beach. Access points are shown on Figure P-4.

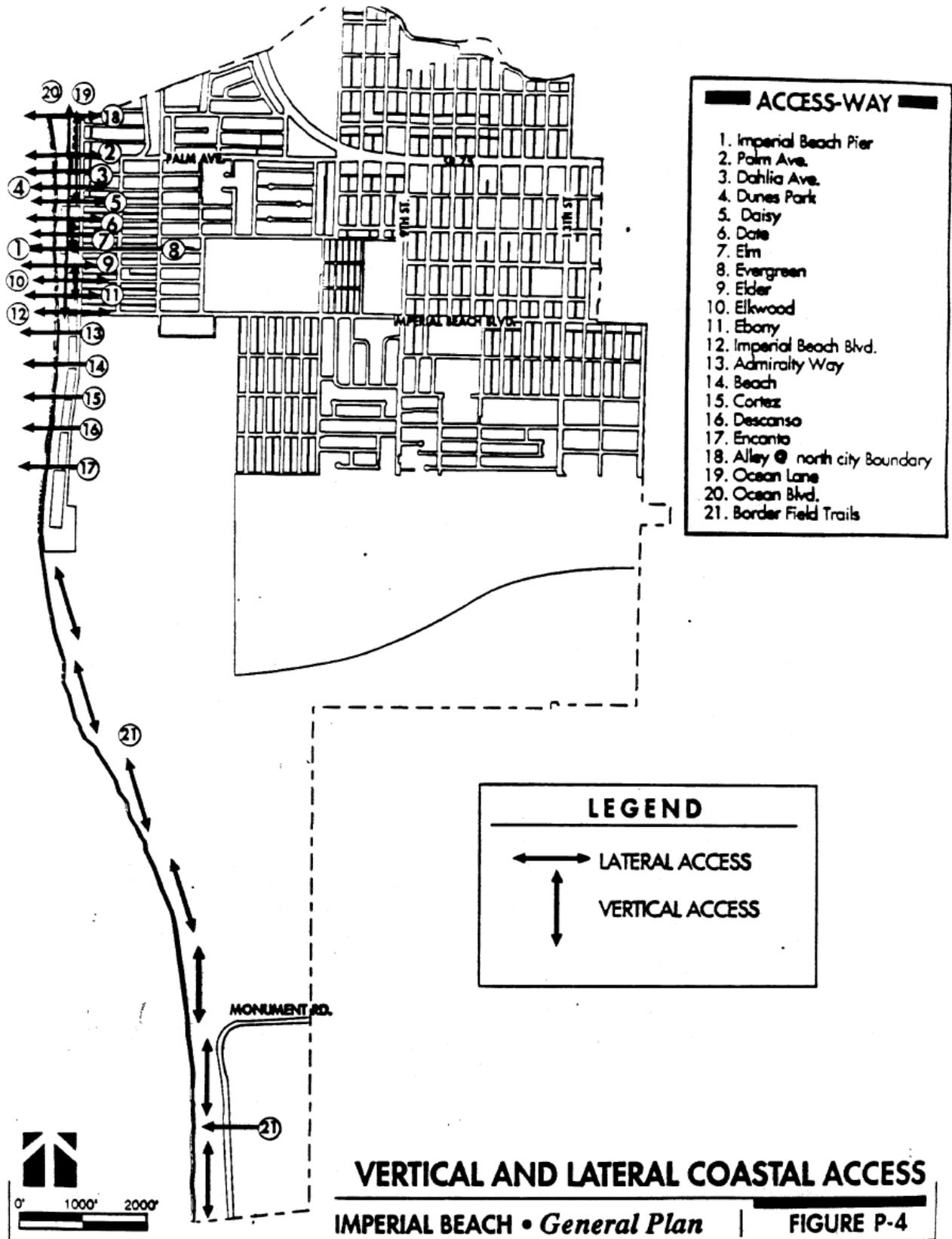
The most heavily used access is at Pier Plaza and the surrounding beaches where there is ample public parking both on and off-street with 90 percent of beach activity taking place north of Imperial Beach Boulevard.

**Frequency of Access-ways:** Throughout the City beach area, the distance between access-ways ranges from a minimum of 200 feet to a maximum 625 feet with a median distance of 250 feet between access-ways; assuming an average walking speed of three miles per hour, the maximum walking time between access-way is slightly more than one minute.

**Access Support Facilities:** The access-ways of the City beach area are supported by a municipal parking lot located between Evergreen and Elder Streets. This lot has parking spaces for approximately 76 vehicles. Parking stalls are metered.

The parking lot is augmented by on-street parking sufficient to handle approximately 370 additional vehicles. On-street parking is provided on Seacoast Drive and on each of the City's street ends.

<b>TABLE P-2</b>				
<b>Vertical and Lateral Coastal Access</b>				
<b>Access-way</b>	<b>Use</b>	<b>Type</b>	<b>Width</b>	<b>Condition</b>
1) Imperial Beach Pier	Active <sup>3</sup>	V	30'	Improved
2) Palm Avenue	Active	V	80'	Paved
3) Dahlia Avenue	Active	V	53.3'	Paved
4) Dunes Park	Active	V	Varies	Improved
5) Daisy	Active	V	53.3'	Paved
6) Date	Active	V	53.3'	Paved
7) Elm	Active	V	53.3'	Paved
8) Evergreen	Active	V	53.3'	Paved
9) Elder	Active	V	53.3'	Paved
10) Elkwood	Active	V	53.3'	Paved
11) Ebony	Active	V	53.3'	Paved
12) Imperial Beach Blvd.	Active	V	80'	Paved
13) Admiralty Way	Active	V	53.3'	Unimproved
14) Beach	Active	V	53.3'	Parking & walkway
15) Cortez	Active	V	53.3'	Unimproved
16) Descanso	Active	V	53.3'	Unimproved
17) Encanto	Pass & <sup>4</sup> Repass	V	53.3'	Unimproved
18) Alley @ north City boundary	Pass & Repass	V	18'	Easement
19) Ocean Lane	Active	L	20"	Improved to alley standards
20) Ocean Boulevard	Active	L	Varies	Sand
21) Border Field Horse Trails	Active	L & V	Varies	Sand
V = Vertical Access      L= Lateral Access				
<sup>3</sup> . Active use includes the full range of beach-oriented activities. Alternatively, "passive" use include those activities normally associated with beach use, such as walking, swimming, jogging, etc., but does not include use of the access-way for organized sport activities, campfires, or vehicular access for other than emergency vehicles.				
<sup>4</sup> . Pass and Repass indicates an area where topographic constraints of the site makes use of the beach dangerous, where habitat values of the shoreline would be adversely impacted by public use of the shoreline, or where the access-way may encroach closer than 20 feet to a residential structure. When any of these conditions exists, the access-way may be limited to the right of the public to pass and repass along an access area.				



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# GOALS

## GOAL 14 SHORELINE ACCESS

To provide physical and visual access in the City's five coastal resource areas for all segments of the population without creating a public safety concern, overburdening the City's public improvements, or causing substantial adverse impacts to adjacent private property owners.

# POLICIES

### **P-10 Amend San Diego Unified Port District Master Plan**

The Port District's Master Plan should be amended to include the lands the Port owns in Imperial Beach. The Plan should ensure that the City's pier is fully developed and adequately maintained and develop new shoreline related uses on both Port District owned property and on property leased to them by the City.

### **P-11 Coordinate With State and Federal Agencies**

Guidelines for the use of the Tijuana Estuary should be developed with State and Federal officials. Access and utilization of the area should be controlled by the installation of appropriately designed and posted access-ways. The City should continue to develop a working relationship with the State Department of Parks and Recreation in a coordinated effort to make the Border Field State Park area, and its access to the beach, a resource that is available to the public.

### **P-12 Maintain Environmental Quality**

The environmental integrity of all beach areas shall be maintained and enhanced.

### **P-13 Improving Access-ways**

Priority shall be given to gaining and improving access-ways located in proximity to public parking areas and public transportation routes. The use of these access-ways shall be encouraged through the installation of appropriate Signage. Said signage shall indicate, where applicable, the existence and location of nearby public parking areas. *In the unimproved right-of-way of Ocean Boulevard north of Imperial Beach Boulevard, the City may construct improvements that provide, preserve or enhance public access at the street ends and parks, whether vertical or lateral or both, and which will continue to allow access for equipment for emergency and maintenance purposes. [Amended May 5, 1999, by Ordinance No. 99-936]*

### **P-14 Retain Existing Street Ends**

All existing street ends under City ownership that provide public access to coastal resources, including bays, shall be retained for streets, open space or other public use. View corridors shall be protected and in no case shall buildings be permitted on or bridging the streets. The City shall approve detailed design plans for each street end.

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### **P-15 Ocean Lane and Alleys West of Seacoast Drive**

In the event that public access and the public interest may be served by the alteration or development of Ocean Lane or alleys west of Seacoast Drive, the City may consider vacation when:

- a. Ocean Lane or alley vacation would permit development requiring consolidation of two or more lots, including the public right of way, and;
- b. A development would involve a use related to public recreation and/or visitor serving facilities, and;
- c. In either a or b above, the new development shall incorporate within its planning and building design:
  - (1) A means of maintaining or restoring physical public access to the shoreline, and;
  - (2) A means of maintaining visual public access to the shoreline, and;
  - (3) A means of maintaining or restoring public vehicular parking.

### **P-16 Prescriptive Rights**

No individual, partnership or corporation claiming or possessing the frontage for titlelands of a harbor, bay inlet, estuary, or other navigable water in Imperial Beach, shall be permitted to exclude the right-of-way to such water whenever it is required for any public purposes, including public rights obtained by prescriptive easement, nor destroy or obstruct the free navigation of such water. The City of Imperial Beach shall protect and enhance beach access and continue to formalize prescriptive rights.

# S SAFETY ELEMENT

*Men come together in cities for security; they stay together for the good life.*  
*Aristotle*

## BACKGROUND

California General Plan law requires the Safety Element to address means of protecting the community from unreasonable risks associated with fire, flood, geologic and seismic hazards. This Element also implements provisions of the California Coastal Act pertaining to minimizing hazard potential in the Coastal Zone.

The policies and actions included are based upon determinations as to the acceptable levels of exposure to risk for each type of hazard. The evaluations and policies necessarily involve judgments based upon such factors as the severity of the hazard; the likely frequency of damage-inducing events; the potential number of persons exposed to the risk; and the amounts of potential losses due to injuries, deaths, and damage to property.

There are three basic types of risk to consider: the risk to human life and limb, the risk to property and the risk of societal disruption. These are distinct, although not totally independent considerations. Normally, reducing one type of risk will reduce another type of risk as well.

Clearly, public agencies have a role in protecting the public from death or injury, and the reduction of this risk should have the highest priority. Property damage risk is the second highest priority while the risk of public disruption would have the lowest priority.

## Fire Hazards

Fire hazards, including brush land and structure type, are a significant problem in San Diego County. Except for the salt marsh, where the vegetation is generally non-combustionable, Imperial Beach is almost completely urbanized. Therefore, urban fire hazards are the main concern in Imperial Beach.

### 1. Hazards Setting

Fire has long been recognized as an especially dangerous threat in urban areas. As population concentrations increase in built-up areas, the factors necessary for fire ignition increase, as do the chances of a fire spreading rapidly once it starts. The factors of population density and the resultant high material and energy

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concentrations in cities mean that the loss of life, injury and property damage from fire are greater in urban areas than in less densely settled rural areas.

**2. Single Family Residential Buildings**

Single-family detached houses form a major portion of the housing stock in Imperial Beach. Fires occur in private homes from a variety of causes, human carelessness being chief among them. More lives are lost in residential fires than in any other type of fire. Without adequate setbacks or other fire prevention techniques such as firewalls, residential fires can spread easily due to the weld frame construction of most single-family structures and the common usage of untreated wood shingles. While the general climate in Imperial Beach is relatively humid, fire can spread easily between single-family homes.

**3. Multi-Story Buildings**

Buildings over three stories pose difficult fire control problems. The large number of occupants and their dependence on internal support systems, such as water pressure systems, ventilation systems and elevator systems, increases the potential for disaster. Adequate response to buildings over three stories requires improved internal extinguishing systems and special equipment, such as helicopters and aerial ladders.

**4. Hospitals and Medical Facilities**

Imperial Beach has no full service hospital; however, several medical complexes are located in the area. These facilities present critical fire control problems. Damage to sophisticated medical equipment by fire threatens the lives of present and future patients. Those mentally or physically debilitated cannot react during crisis in a way that would insure minimum safety standards. In times of emergency, ailments are aggravated by stress, and the medical staff is usually inadequate to provide enough aid and guidance.

**5. Indoor Public Assembly Facilities**

Public assembly facilities are defined as those in which large numbers of people congregate in generally unfamiliar surroundings. They include schools, theaters/assembly, religious assembly, and a variety of recreational facilities. Gatherings of large numbers of people in these buildings create conditions conducive to mass panic in a crisis, which only worsens and increases casualties. Administering medical aid is made more difficult in these situations, as well.

**6. Industrial Fire Hazards**

Potentially hazardous industrial operations encountered in Imperial Beach include utility lines such as gas lines and overhead electrical power lines. While the normal construction of utility lines provides a good degree of safety, gas lines do break and power lines do come down causing fires.

Another aspect of industrial fire hazards involves the transportation of industrial-

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related, flammable materials on the major highways and freeways of the area. Regulatory powers that govern the transportation of these materials are the responsibility of State and Federal agencies; however, local fire and police departments are called upon to safeguard public safety when hazardous situations develop.

**7. Municipal Pier Hazards**

Fishing and/or boat launching piers usually have conditions of use, which contributes to safety hazards. The Imperial Beach Municipal Pier is a main attraction for tourists and residents and, has structures on its end. The Pier has a water main extending its entire length.

**8. Fire Protection**

(See Facilities and Services Element)

**9. Adequacy of the Water System**

Generally, adequate water supplies for fire suppression exist throughout the City. Water is a critical element in fire protection. Of all the factors considered by fire insurance underwriters, water supply is the most heavily weighed. (See Facilities and Services Element)

**10. Findings Related to Fire Hazards, Fire Prevention and Safety**

Fire prevention measures are usually undertaken for the safety of residents and property, as well as to reduce insurance premiums.

- a. One of the most important regulatory codes from the standpoint of fire safety is the Uniform Building and Fire Codes. The uniform codes are intended to serve only as minimum standards. Thus, it is important that the latest versions of these minimum standards be adopted and enforced by the Fire and Building Departments.
- b. The Zoning Ordinance should help prevent the construction of unsuitable or hazardous structures.

Subdivision regulations are used to reduce the risk of fire as they govern the process of dividing land into building sites.

- c. Weeds are a fire hazard. Weed abatement ordinances, strictly enforced, can eliminate this potential hazard.
- d. Certain structures can be classified as "fire hazardous" and should be considered as public nuisances. Fire hazardous buildings are those which, upon ignition, permit the rapid spread of fire. They are generally characterized by substandard electrical wiring, open stairwells and obsolete heating facilities. When combined with human carelessness or maliciousness, these deteriorated conditions offer a potential for disaster.



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# Flood Hazards

Flood hazards in Imperial Beach can be categorized as local flooding and flood plain inundation.

## 1. Local Flooding

Surface run-off, a condition intensified by development as a result of soil compaction and paving is presently handled by the street system and a small storm drain system. The local system is, for the most part, adequate.

## 2. Flood Plain Inundation

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% of which lies within the United States.

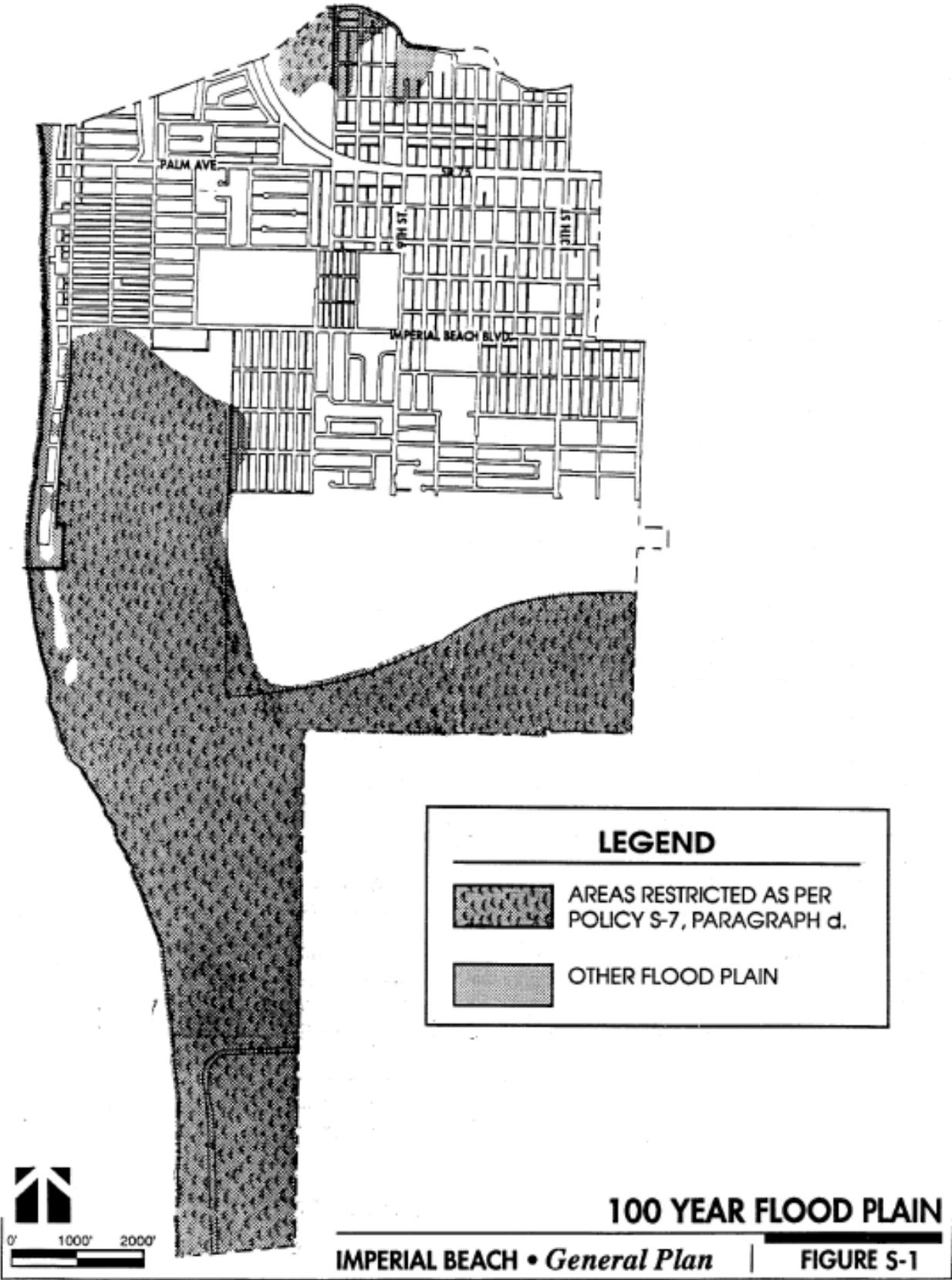
The river crosses the border at a point five miles inland from the Pacific Ocean and flows through the fertile Tijuana River Valley. This valley area is predominantly agricultural open space. At the point where the river approaches the Imperial Beach City limits, it turns into an estuary.

The largest recorded flood on the Tijuana River occurred in 1916. Seven other major floods occurred along the river in 1884, 1889, 1895, 1906, 1921, 1927 and 1937. Since 1936, the present 1,500 cubic feet per second capacity of the Tijuana River channel was exceeded eleven times. While the construction of dams upriver will continue to reduce the incidence of downstream flooding along the river, incidences of flows in excess of 1,500 cubic feet per second can still be expected.

Imperial Beach's flood plain areas are shown in Figure S-1.

Most of the identified 100-year flood plains encompass 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.

Finally, Bayview Elementary is located in an area designated as a flood hazard zone. Extra precaution, in the form of adequate drainage facilities, should be taken to protect this public facility from potential damage.



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# Geological and Seismic Hazards

## 1. Local Geology

Imperial Beach's geology is shown in Figure S-2.

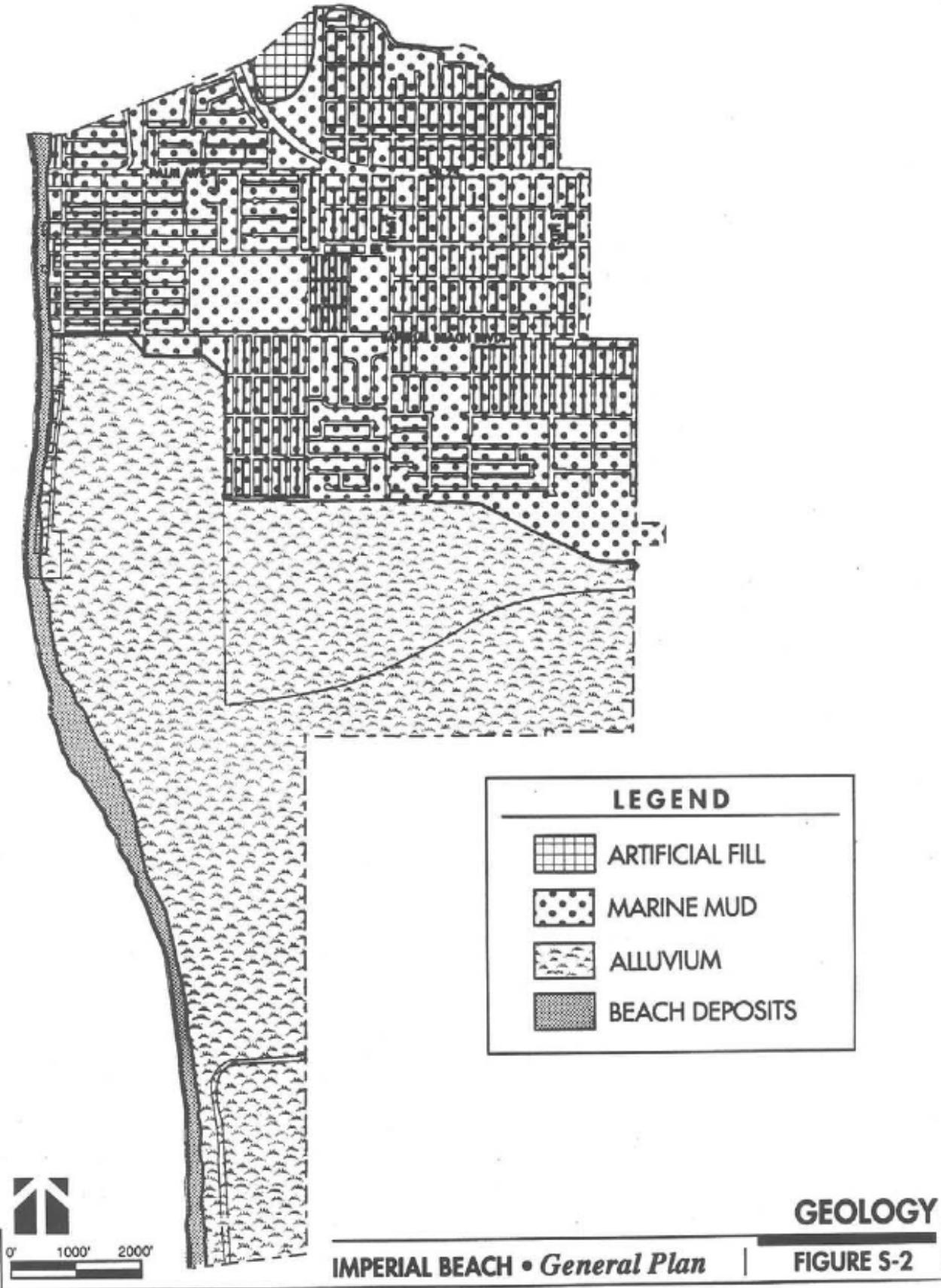
Like most of the South Bay area, Imperial Beach is underlain by the San Diego Formation, a tertiary shallow water marine deposit of Pliocene Age. An important feature of this formation is the fact that it is locally fossiliferous. The formation consists of chiefly dense, easily pulverized, silty, very finely bedded sandstones.

The more recent Quaternary deposits include three general types of material. A narrow strip of beach deposits, whose deposition is mainly caused by ocean currents and wave action, is found along the entire coastline of Imperial Beach. The urbanized area of the City is almost entirely underlain by the Baypoint formation, which consists of recent marine mud. The surface geology of the Tijuana River Estuary consists of alluvial material. This deposition was caused by the Tijuana River's erosive action upstream. The alluvial material consists of layers of sand and gravel, as well as larger stones.

## 2. Seismic Hazards

Virtually, any land bordering the Pacific Ocean is subject to those effects of the movements of the earth's crust known as earthquakes. Even though Southern California is known for its earthquakes, actual losses to life and property have been small. In fact, these losses have been much less than other areas of the world, which routinely suffer from tornadoes, epidemics, hurricanes or earthquakes. It is generally agreed, however, that the potential for severe earthquake damage does exist, and that local authorities should provide some measure of security against that potential. The purpose of the Safety Element is, therefore, to set forth policies and programs which will help protect life and property from preventable damage due to seismic activity.

Available data indicate 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, the maximum probable earthquake from this fault is between 7.5 and 7.8 on the Richter scale; (2) The Elsinore fault zone paralleling the San Jacinto fault zone is the largest known active fault in the county of San Diego. It is approximately 135 miles long. The area of most probable activity is between Lake Elsinore and Vallecito Valley, a distance of about 60 miles. The maximum probable earthquake magnitude from this fault is 7.6; and (3) The Rose Canyon fault zone, paralleling the Pacific coastline, is considered to be the possible southeasterly extension of the Newport-Inglewood fault zone, which was the source of the 1933 Long Beach earthquake.



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The Sweetwater and LaNacion Faults are located 4 to 6 miles inland from and parallel to the Rose Canyon fault and San Diego Bay. Presumably, they are related to the fault system which created the depression now occupied by San Diego Bay and Mission Bay. These two faults do not appear to have been active in recent time. The LaNacion is the closest fault to Imperial Beach, being located about 2 miles east of the City.

The San Diego region has historically been seismically quiet (less than 4.0 on the Richter scale) although at least 23-recorded epicenters of 2.0 to 3.0 have been recorded since 1948. Historic records in the San Diego region date back 200 years. Of that period, the last 40 years represent accurate technical data. The Elsinore and San Jacinto faults have exhibited enough activity in this century to warrant making statements on their respective degree of activity as follows:

- For the Elsinore fault: one in 60 years at 7.3 magnitude; one in 100 years at a magnitude of 7.6 (maximum credible).
- For the San Jacinto fault: one in 90 years at 7.3; and one in 100 years at 7.8 magnitude (maximum credible). (McEven and Pinckey).

Potential geologic or seismic hazards include the following:

**a. Ground Shaking**

Ground shaking is the oscillation or vibration of earth materials resulting from an earthquake. It is the most commonly experienced earthquake phenomenon because it may be felt tens or hundreds of miles from the earthquake epicenter.

Assuming there are no known faults within Imperial Beach, and the nearest fault is the LaNacion, located 2 miles east of the City, it can reasonably be predicted that any damage from future earthquakes will be due to local ground shaking originating from a more distant source.

Ground shaking hazards are most likely to occur in areas of Imperial Beach underlain by loose, water-saturated, unconsolidated materials commonly referred to as deposits. The severity and type of ground shaking depends on several factors including: (1) earthquake magnitude and duration; (2) distance from the earthquake's epicenter; (3) local subsurface conditions; and (4) type of construction material used.

In general, much of Imperial Beach lies upon deposits which are poorly consolidated or unconsolidated aggregates of silt, sand and gravel. There is high potential of earthquake damage to structures located on this material.

**b. Liquefaction, Lateral Spreading and Differential Compaction**

**Liquefaction**

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Resultant ground shaking during an earthquake will tend to compact loose deposits of cohesionless soils. It is generally recognized the higher the groundwater level the greater the shaking. If the soils are saturated, the compaction will result in an increase in the water pressure in the soil. With increased water pressure, the water within the soil will tend to flow upward and may turn the soil deposit into "quicksand" due to loss of shear strength. Flow to the ground surface may be manifested by sand boils and a gradual sinking or differential settlement of structures. Liquefaction of deeper strata may be manifested by ground cracking and lurching. Where soil thicknesses vary or where subsoil conditions are erratic, differential compaction of the soil layers may occur resulting in differential settlement of the ground surface. In extreme cases, buildings could literally sink into the ground.

The results of laboratory tests and investigations of liquefaction sites indicate that uniformly graded materials (those predominantly of one size such as beach sand) are more susceptible to liquefaction than well-graded materials and that, for uniformly graded soils, fine sands tend to liquefy more easily than do coarse sands, graded soils, silts or oil. In addition, loose soil deposits will tend to liquefy more readily than denser deposits and shallower strata, more than deeper strata. Further, intensity of ground shaking and duration of ground shaking play an important role. The longer the duration of strong shaking, the more likely it is that liquefaction will occur. Since the intensity and duration of ground shaking are somewhat proportional to earthquake magnitude, liquefaction is more likely to occur during moderate to strong earthquakes. When it does occur, the effects are severe with extensive damage resulting from shifting, tilting and floating.

It is emphasized that liquefaction potential depends upon many factors; in addition to ground water levels, are factors such as soil type, relative density and the intensity and duration of ground shaking. Due to the structure of the soils and the high water table within the City limits, liquefaction poses the biggest threat of serious damage in the event of moderate or major seismic activity.

### ***Lateral Spreading***

Lateral spreading is caused by ground shaking that triggers the movement of soils towards an unsupported surface or slope (not necessarily steep). Extensive damage to buildings can result from the mass flow of land areas, particularly along waterfront areas and on soft, saturated clays.

### ***Differential Settlement***

The occurrence of differential settlement has been well documented in many major earthquakes and results from the non-uniform settlement of loose and medium-dense granular soils during ground shaking. Differential settlement

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often results in serious structural damage to buildings and underground utilities.

A general lack of available data precludes a detailed evaluation of ground failure hazards in Imperial Beach. A review of the data that have been collected and a review of the history of seismic events in the San Diego region has not revealed any documented instance of ground failure, other than that of landslides. It should not be concluded, however, that ground failure may not occur due to future seismic activity. It is likely that the soil and ground water conditions in the coastal areas, bay margins, and especially the bay fill areas are places for the potential hazards identified above to occur.

**c. Fault Displacement**

Ground fractures may occur during an earthquake where there are uncompacted soils or an abrupt change in depth of the bedrock beneath the subsoil. Some soils affected by seismic vibrations may be compacted or lurch sideways causing cracks in the ground.

The closest fault to Imperial Beach is the LaNacion Fault, located about 2 miles east (running in a north/south direction) of Imperial Beach. It is not likely, therefore, that extensive fault displacement will occur in Imperial Beach.

***Subsidence and Uplift***

Subsidence and Uplift often accompany fault movement. Such movement affects harbor levels, the flow of water in canals and tunnels and distorts land survey lines. This phenomena is typically associated with the withdrawal of groundwater or petroleum, with large limestone deposits; with volcanism; or with hydro compaction. None of these constitute a significant problem in Imperial Beach.

**d. Groundwater Problems**

Because of the presence of the estuary and lands that are periodically inundated, the groundwater level in Imperial Beach is relatively high, less than 25 feet in the urban areas of the City, and as close as eight feet to the surface at Ninth Street and Imperial Beach Boulevard.

The presence of shallow groundwater, in conjunction with other soil parameters, can be of great consequence in terms of ground stability during an earthquake i.e., liquefaction. The largest area subject to this hazard is around the margin of the San Diego Bay.

Studies of recent earthquakes have concluded that some liquefaction has occurred in every major earthquake observed around the world in the past ten to fifteen years.

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For liquefaction to potentially occur, three conditions are necessary: 1) generally cohesionless soils, 2) groundwater, and 3) moderate or major earthquake. In Imperial Beach, as in other areas along the Pacific Coast, as well as throughout the world, all three conditions or potential conditions exist in varying degrees.

### **3. Expansive Soils**

An expansive soil is one which will substantially increase in volume when wetted and, because the process is reversible, will shrink when it dries. This is characteristic of cohesive, clay-like soils.

Expansive soils are a common feature and problem throughout Southern California. Not only do direct damage costs amount to many millions of dollars each year (for Southern California), but the damage is usually reflected in lower property values and resulting tax revenues. The problems resulting from expansive soils can be controlled by proper engineering and construction practices. The presence or absence of expansive soils is therefore not considered a critical factor in overall land planning. What is critical is to ensure that proper engineering and construction practices are observed. The City should remain cognizant of the problem. Soils in Imperial Beach are shown in Figure S-3.

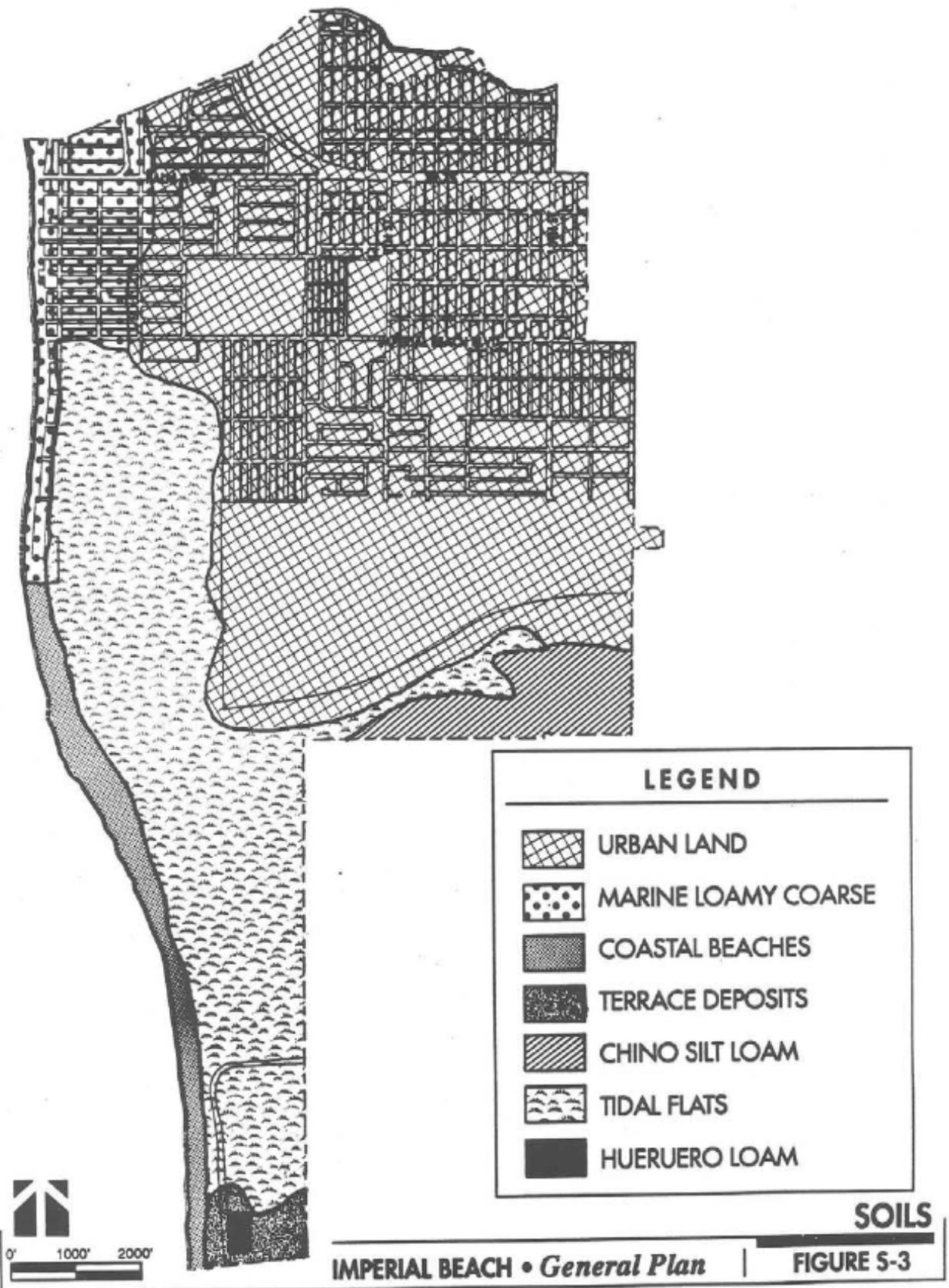
### **4. Landslides**

Since the terrain of Imperial Beach is generally flat, landslides cannot be considered a significant hazard. There are, however, small cliffs within Border Field State Park and at the south end of Seacoast Drive. Limited landslides may occur in these areas during an earthquake of sufficient magnitude.

### **5. Tsunamis and Seiches**

A Tsunami is a sea wave generated by a submarine earthquake, landslide or volcanic action. While the possibility of a major tsunami from either of the latter two events is considered to be extremely remote for Imperial Beach, a tsunami caused by a submarine earthquake is considered possible. Submarine earthquakes are common around the edges of the Pacific Ocean, as well as other areas. Therefore, all of the Pacific Coastal areas are subject to this potential hazard to a greater or lesser degree.

Tsunamis travel across the ocean as powerful, long, but low waves; perhaps 50 miles long and only one or two feet high. Traveling at almost 500 mph in the Pacific, such a wave in the open causes no problems; and, in fact, the slope of the wave front may be imperceptible to a ship at sea. However, as the tsunami waves approach the coastline, they are affected by shallow bottom topography and the configuration of the coastline, which transform the waves into very high, potentially devastating waves. Even if large waves do not occur, strong currents (as high as 40 feet per second) can cause extensive damage.



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Even though most of Imperial Beach lies within the category of low-lying shoreline, it is not possible to predict the likelihood or magnitude of a major tsunami. Most experts agree that although possible, it is highly improbable that a damaging tsunami, either locally or distantly generated, would strike the Southern California coast.

## Shoreline Protection

The Imperial Beach shoreline is located within the Silver Strand Littoral Cell. The cell, which is a shore and sand accumulation area, extends from Playas de Tijuana, Baja, California Mexico, to the Zuniga Shores area near the ocean entrance to San Diego Bay. Since the mid-1800's, sand migration from the Tijuana river delta and the seacliffs at Playas de Tijuana, along with periodic City beach replenishment projects (which took place from 1941 to 1985) have been the primary source of new beach sand in Imperial Beach. However, in more recent years, the Mexican Government has added to the beach erosion problem by building dams on the Tijuana River Basin, which have trapped approximately 660,000 yards of sand per year. This is sand that normally would have reached the beach if not entrapped by these dams. Because of this, the beach has had to undergo beach replenishment from dredging and an artificial replenishment of the beach. Sand transport in this area of the Pacific Ocean is predominantly to the north, although some material moves to the south. The width of the City's beach has varied greatly over the years with beach erosion and sand loss being particularly evident during the winter storm season.

The Imperial Beach shoreline has undergone erosion for many years but the problem became acute during the winter of 1952-53 when wave erosion caused rapid shoreline retreat and property damage. Winter storms during the next several years continued to cause problems so that local and private interests were forced to install a stone revetment along the shoreline. In 1959, the U.S. Army Corps of Engineers started construction of a system of five stone groins starting at the U.S. Naval Radio Station proceeding southward to a point approximately 400 feet south of Imperial Beach Boulevard. Four groins were eventually constructed, but the compartments between two groins were never completed which caused the destruction of the remaining groins. The ineffectiveness of these groins eventually necessitated further investigations and the development of a new plan.

The Corps of Engineers studied several alternative solutions including fixing the groins system, periodic beach nourishment, and offshore breakwaters. In 1978, the recommended plan was to construct a 5,000-foot offshore-submerged breakwater, extend one of the existing groins, and construct a new groin approximately 600 feet long. In 1985, construction of the breakwater was to start but was halted when courts determined that the Environmental Impact Statement (EIS) did not address all the relevant issues. A revised EIS was never adopted.

During this period, private property owners initiated their own shoreline protection

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arrangements. Older buildings developed along the shore without benefit of engineered structures have been previously damaged and will continue to be damaged as the beach recedes. Newer structures have been built with either or both stone revetments or vertical seawalls. These protection devices do not solve the beach replenishment issue and may ultimately fail as the beach slowly recedes.

In 1991, the San Diego Association of Governments (SANDAG) initiated steps to develop comprehensive countywide shoreline protection guidelines to manage the coastal sediment resource and protect coastal property from damage caused by breaking waves and marine flooding. The following goals were followed in preparing these guidelines:

- a. Develop a framework within which all commonly used tactics or methods can be considered.
- b. Develop a description of what specific tactics can and cannot be achieved.
- c. Develop a description of possible adverse effects and ways to reduce or eliminate those adverse effects.

Based on subsequent research SANDAG adopted the plan entitled "Shoreline Preservation Strategy for the San Diego Region" in 1993. The strategy has been accepted by the City of Imperial Beach and all other coastal cities in San Diego County. The goals and policies the City adopted with its acceptance of the SANDAG "Shoreline Preservation Strategy" are incorporated into the General Plan.

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## **GOALS**

### **GOAL 15 SAFETY PROTECTION**

The City shall insure the protection of life and property from fire, flood, geologic and seismic related hazards.

### **GOAL 16 SHORELINE PROTECTION**

To manage the City's shoreline in a way which enhances the shoreline environment while also providing recreational opportunities and property protection.

Develop and carry out a cost-effective combination of shoreline management tactics that will have a positive impact on the regions economy and to develop a program to pay for the shoreline management strategy which equitably allocates costs throughout the region, and among local, State and Federal sources.

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# POLICIES

**S-1 Technical Studies**

No development should proceed until geo-technical investigations and recommendations are completed concerning potential soils, geologic, seismic and/or flood hazards and to determine which land uses (if any) are appropriate for the site, and to determine what measures could be undertaken to reduce risks to life and property.

**S-2 Leave Hazardous Areas Underdeveloped**

Developers should be required to leave potentially hazardous areas undeveloped and to leave sufficient open space adjacent thereto to insure public health and safety.

Areas which are suitable for development, yet surrounded by potentially hazardous lands, should be restricted from development due to the danger of complete loss of ingress or egress routes in emergency situations from flooding. An inventory shall be made to identify the location and extent of such areas in the City.

**S-3 Floodplains In Open Space**

Primary areas subject to flooding are recommended for permanent open space use.

**S-4 High Risk Areas**

Emergency and critical use facilities (hospitals, schools, etc.) should be restricted from all high-risk areas.

**S-5 Construction Near Fault Traces**

In the unlikely event that an active fault is determined to exist in the Imperial Beach area, no portion of any habitable structure should be built across the fault and the area 50 feet on either side of the fault should be assumed to contain active branches of the fault until proven otherwise.

**S-6 Cliff Top Development**

Imperial Beach has few sea cliffs, however for those limited areas in the City where sea cliffs exist, at the time of new development, or recycling of land uses, any buildings should remain at least 50 feet from the top of the cliff. Unless a competent geologist certifies that development any closer will not result in risk to the building in case of a landslide, or in cliff buttressing which violates State Coastal Act policies.

Building plans shall assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that

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would substantially alter natural landforms along bluffs and cliffs.

### **S-7 Flood Control Program**

The City should take the necessary action to develop and constantly update an adequate flood control program including:

- a. Construction permits should not be granted in obvious areas of future flooding unless adequate flood protection measures are developed.
- b. Whenever possible, the minimum finished floor level for structures should be above the known or projected flood plain level.
- c. The City should adopt policies to prevent encroachment on existing water courses.
- d. Development shall be restricted to open 100-year floodplain areas that remain uncommitted to development as identified on Figure S- I No permanent structures or filling shall be permitted in the floodplain and only uses compatible with periodic flooding shall be allowed.

### **S-8 Disaster Preparedness**

Imperial Beach and San Diego County actively participate in a program of disaster preparedness and relief for those extraordinary emergency operations of both governmental and nongovernmental groups. Imperial Beach should continue to maintain an Emergency Operations Plan (EOP), which is compatible with, and complimentary to, that of the County.

### **S-9 Public Education**

The City should:

- a. Initiate education programs in lower grades using displays and demonstrations that would expose younger children to the nature and danger of fire. Such programs would tend to replace their natural curiosity with a sense of respect.
- b. Support or sponsor exhibits and presentations in secondary schools which demonstrate the more involved aspects of fire dynamics; i.e., major contributing factors to fire hazard and the relationship of fire to the natural ecology. Encourage parental cooperation and assistance in overall fire education programs.
- c. Develop a public information program to familiarize the citizens of the region with the Public Safety Element. School Districts and agencies which deal with the aged, handicapped and susceptible industries should be encouraged to develop educational programs relative to public safety awareness.

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## **S-10 Regulate Shoreline Land Use and Development**

The City should regulate shoreline land use and development by:

- a) Minimizing construction on beaches and in front of seacliffs.
- b) Require setbacks from beaches and low-lying coastal areas.
- c) Regulate sand mining if some were to occur.

## **S-11 Storm Waves, Flooding and Seacliff Erosion**

Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, shoreline protection devices and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing principal structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Prior to completion of a comprehensive shoreline protection plan designed for the area, interim protection devices may be allowed provided such devices do not encroach seaward of a string line of similar devices.

New Development fronting on Ocean Boulevard north of Imperial Beach Boulevard shall incorporate an engineered vertical seawall in its design if it is determined that shoreline protection is necessary. Such a seawall shall, except for required toe protection, be located within the private property of the development and shall be sufficient to protect the development from flooding during combined design storm and high tide events. *Public improvements shall be designed to avoid shoreline protection, if possible. Any necessary protection shall be the minimum necessary and shall not extend onto the beach further seaward than the authorized vertical shoreline protection on either side of the access improvements; or, in the absence of contiguous shoreline protection, the alignment cannot extend further seaward than the inland extent of Ocean Boulevard right-of-way. An exception may be made for necessary protection associated with public improvements at the Palm Avenue street end, which may extend seaward a sufficient distance to accommodate a transition to the existing groin. All improvements shall be designed to minimize impacts to shoreline sand supply. [Amended May 5, 1999, by Ordinance No. 99-936]*

Any sand excavated during grading for any permitted development shall be analyzed for suitability for beach nourishment and shall be utilized therefore if found to be suitable.

The City should protect property by:

- a) Creating artificial dunes pursuant to SANDAG technical specifications.

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- b) Developing a coastal shoreline protection device ordinance for the design and construction of seawalls and revetments.
  - c) Developing erosion management measures such as irrigation controls, landscaping ordinances, and other measures suitable to the changing nature of the Imperial Beach shoreline.
  - d) Working in coordination with SANDAG and other coastal cities in developing a regional beach replenishment program and continuing to implement the adopted "Shoreline Preservation Strategy for the San Diego Region".