

City OF IMPERIAL BEACH

HOUSING ELEMENT OF THE GENERAL PLAN YEAR 2021-2029



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 16th day of June 2021, by the following vote:

| | | |
|----------------|------------------------|---|
| AYES: | COUNCILMEMBERS: | AGUIRRE, LEYBA-GONZALEZ, FISHER, SPRIGGS |
| NOES: | COUNCILMEMBERS: | NONE |
| ABSENT: | COUNCILMEMBERS: | DEDINA |



**ED SPRIGGS,
MAYOR PRO TEMPORE**

ATTEST:



**SUNEM CARBALLO, CMC
DEPUTY CITY CLERK**

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Section 1: Introduction

1.1 Statutory Framework

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

Recognizing the importance of providing adequate housing in all communities, the State has mandated a Housing Element within every General Plan since 1969. It is one of the seven 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.

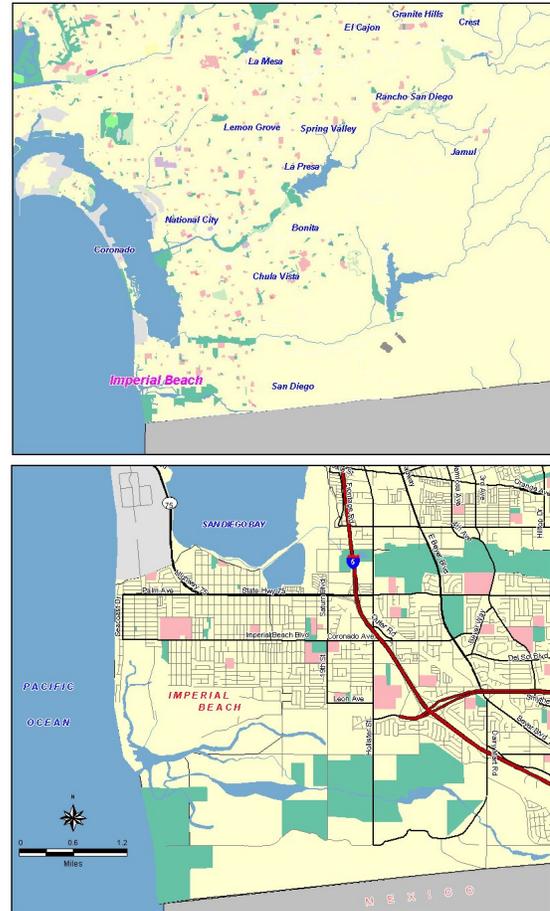
Imperial Beach contains an area of 4.5 square miles. Its coastal setting and Mediterranean climate provide a unique and attractive living environment. The City is almost entirely built out with a few vacant parcels. Future development will primarily take place through upgrading and reuse of existing 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% |
| Imperial Beach | 26,992 | 26,324 | 28,055 | 30,369 | -2.5% | 6.6% | 8.2% |
| 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.

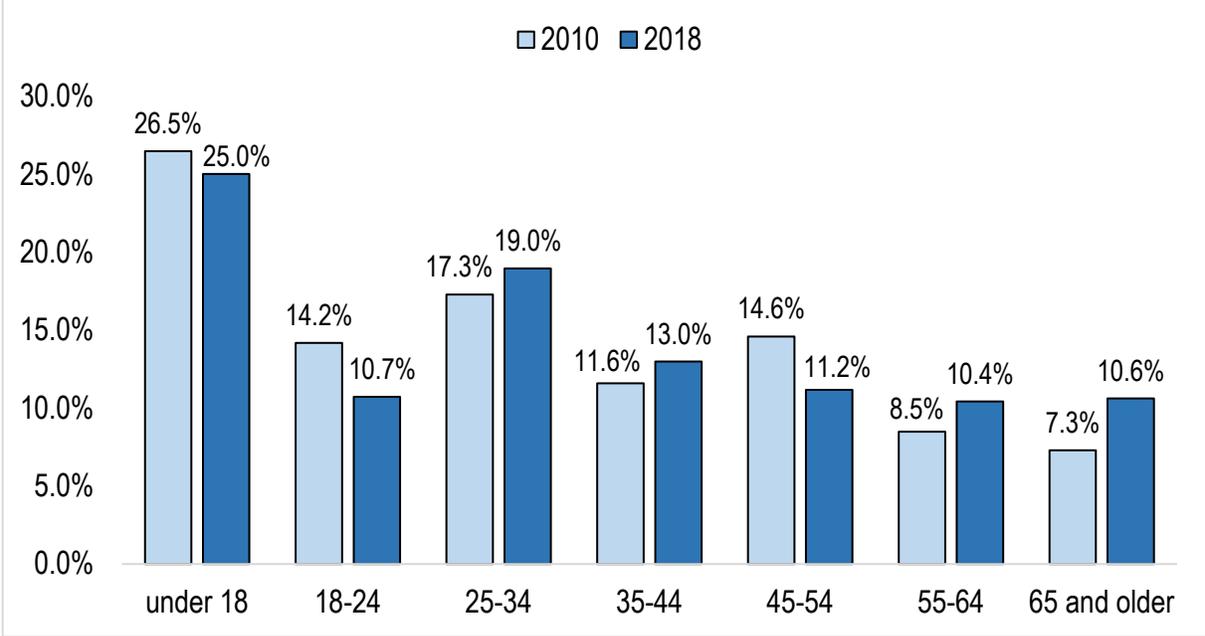
The population of Imperial Beach is, as measured by the median age of its residents, considerably younger than the County as a whole (Table H-2) . In 2018, Imperial Beach's median age was 32 years; nearly three years younger than the County's median age. The lower median age is due to the larger percentage 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 |
| Imperial Beach | 29.4% | 25.4% | 25.0% | 7.5% | 9.0% | 10.6% | 32.4 |
| 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 |
| San Diego County | 25.6% | 23.4% | 22.0% | 11.1% | 11.4% | 13.3% | 35.6 |

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

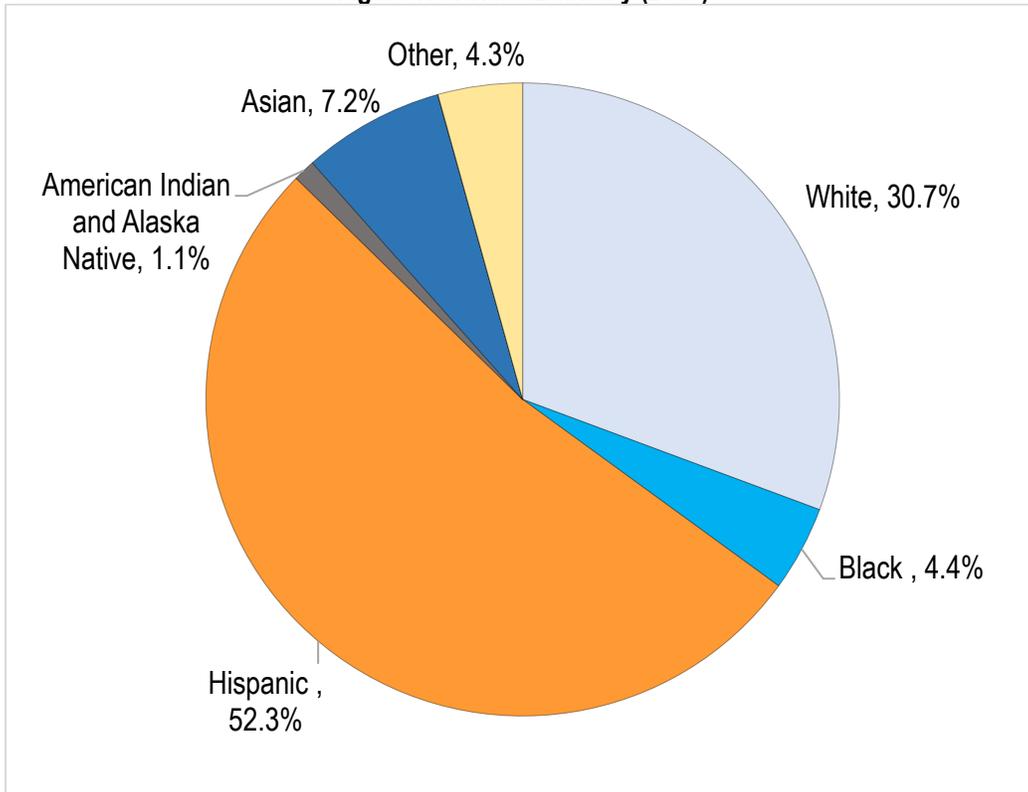
2.1.3 Racial and Ethnic Composition

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 households¹. 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.

¹ 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% |
| Imperial Beach | 30.7% | 4.4% | 52.3% | 1.1% | 7.2% | 0.0% | 4.3% |
| 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% |
| Total | 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 (1st 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% |
| Imperial Beach | 25.5% | 17.1% | 34.5% | 14.2% | 3.8% | 9.8% |
| 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 | |
| | # | % | # | % | # | % | # | % | # | % |
| Families | 6,449 | 69.6% | 6,213 | 68.2% | 6,005 | 65.4% | -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% |
| Non-Families | 2,823 | 30.4% | 2,899 | 31.8% | 3,170 | 34.6% | 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% |
| Total Households | 9,272 | 100.0% | 9,112 | 100.0% | 9,175 | 100.0% | -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 |
| Imperial Beach | 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.² Imperial Beach also has a much higher lower income population compared to San Diego County’s overall lower income population (43 percent).

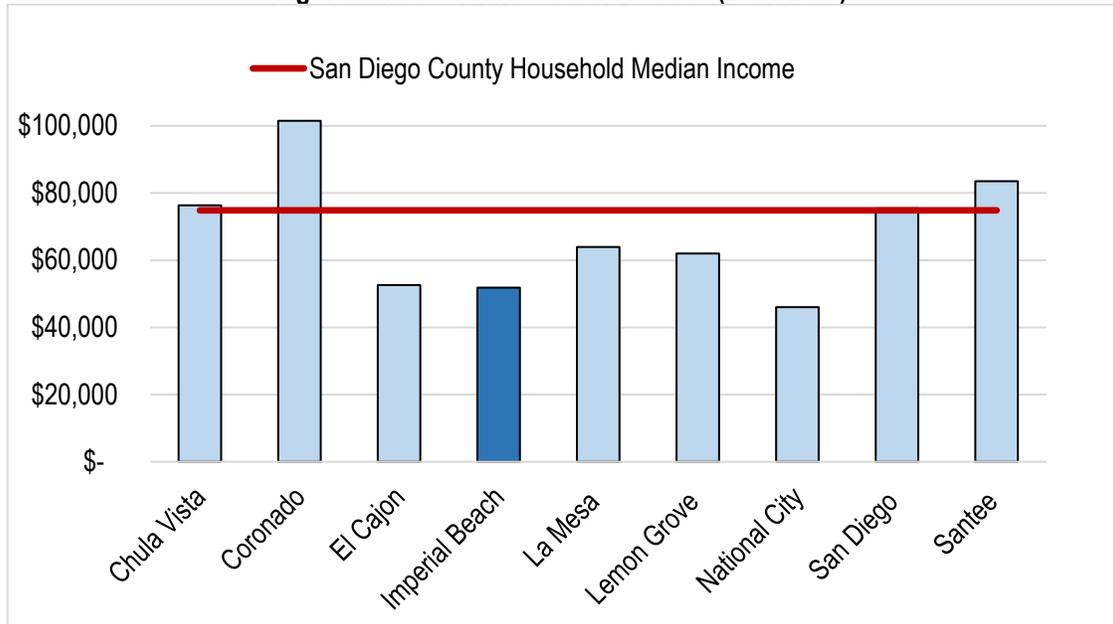
| Income Category (% of County AMI) | Imperial Beach | | San Diego County | |
|-----------------------------------|----------------|---------------|------------------|---------------|
| | Households | Percent | Households | Percent |
| Extremely Low (30% AMI or less) | 1,640 | 18.5% | 155,060 | 13.9% |
| 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% |
| Total | 8,845 | 100.0% | 1,111,735 | 100.0% |

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.

² 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)

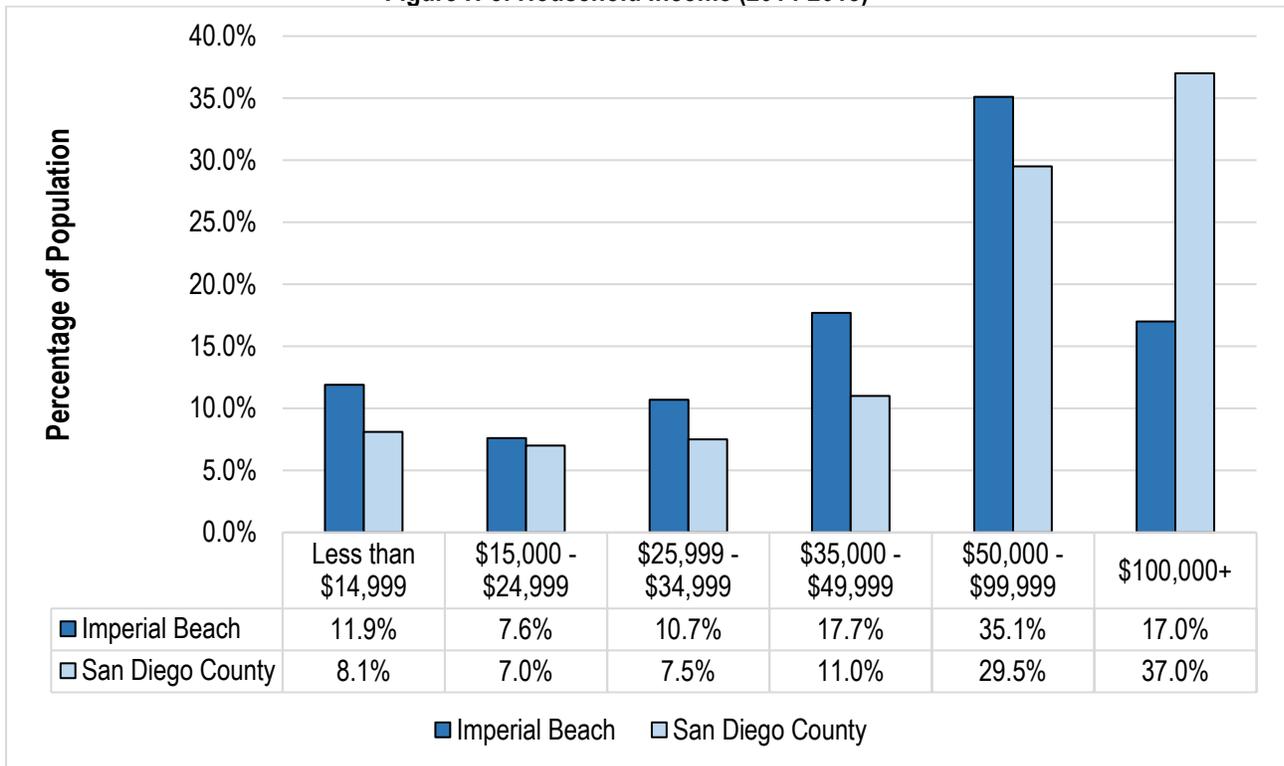


Source: American Community Survey (2014-2018 Estimates).

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).

- Large³ 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 | |
| Imperial Beach | | | | | | | | | |
| 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 >30%</i> | 55.6% | 49.9% | 53.9% | 53.6% | 26.9% | 32.5% | 29.3% | 32.9% | 47.1% |
| <i>With cost burden > 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).

³ 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.

| Table H-13: Overcrowded Housing Units - Imperial Beach and San Diego County (2000-2018) | | | | | | |
|---|-------------------------|--------------------|--------------------------|---------------------|-------------------------|-------------------|
| Overcrowding | Owner Households | | Renter Households | | Total Households | |
| | Number | % of Owners | Number | % of Renters | Number | % of Total |
| Imperial Beach | | | | | | |
| 2000 | | | | | | |
| Total Overcrowded (>1.0 persons/room) | 213 | 7.7% | 1,567 | 24.1% | 1,780 | 19.2% |
| Severely Overcrowded (>1.5 persons/room) | 93 | 3.3% | 898 | 13.8% | 991 | 10.7% |
| 2006-2010 | | | | | | |
| Total Overcrowded (>1.0 persons/room) | 71 | 2.5% | 875 | 13.9% | 946 | 10.3% |
| Severely Overcrowded (>1.5 persons/room) | 33 | 1.2% | 619 | 9.8% | 652 | 7.1% |
| 2014-2018 | | | | | | |
| 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% |
| San Diego County* | | | | | | |
| 2006-2010 | | | | | | |
| 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% |
| 2014-2018 | | | | | | |
| 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 |
| Imperial Beach | | | | | | |
| 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% |
| Total | 6,315 | 2,834 | 9,149 | 6,025 | 2,795 | 8,820 |
| 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% |
| San Diego County | | | | | | |
| 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% |
| Total | 467,840 | 593,945 | 1,061,785 | 522,585 | 589,145 | 1,111,730 |
| 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).

| Jurisdiction | Total | Age 65+ | Percent Age 65+ |
|--|---------------|----------------|------------------------|
| Chula Vista | 266,468 | 32,212 | 12.1% |
| Coronado | 23,620 | 4,656 | 19.7% |
| El Cajon | 103,285 | 12,341 | 11.9% |
| Imperial Beach | 27,290 | 2,902 | 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% |
| <i>Source: American Community Survey (2014-2018 Estimates)</i> | | | |

Resources

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

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% |
| Total Disabled Persons | 184 | 1,689 | 2,182 | 3,102 |
| <i>Note: A person can have multiple disabilities. 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 principles⁴ 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.⁵ 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).

⁴ 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.

⁵ 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% |
| Total Households | 760 | 6,025 | 335 | 2,795 | 1,095 | 8,820 |
| 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.

| | Imperial Beach | San Diego County |
|--|-----------------------|-------------------------|
| 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).⁶ 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

⁶ 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 19th 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.⁷ 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

⁷ <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.

| Jurisdiction | Total |
|--|--------------|
| Chula Vista | 313 |
| Coronado | 16 |
| El Cajon | 784 |
| Imperial Beach | 16 |
| 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% |
| Imperial Beach | 9,739 | 9,882 | 10,146 | 1.5% | 2.7% | 4.2% |
| 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.

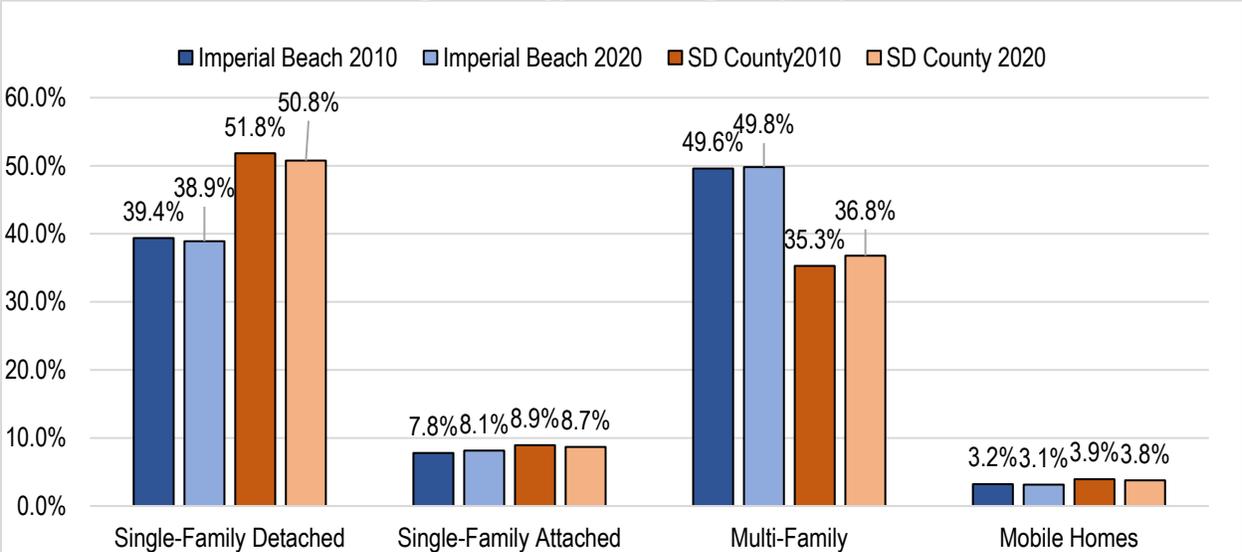
| Jurisdiction | 2020 | 2035 | 2050 | Percent Change | |
|-----------------------|-----------|---------------|---------------|----------------|--------------|
| | | | | 2020-2035 | 2020-2050 |
| Chula Vista | 86,785 | 101,188 | 108,273 | 16.6% | 24.8% |
| El Cajon | 36,282 | 38,163 | 40,758 | 5.2% | 12.3% |
| Imperial Beach | 10,146 | 10,926 | 11,528 | 7.7% | 13.6% |
| 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% |
| Total Housing | 9,882 | 100.0% | 10,074 | 100.0% | 10,926 | 100.0% | 11,528 | 100.0% |

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% |
| Total | 9,112 | 100.0% | 9,175 | 100.0% |

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 |
| Total | 2.82 | 2.91 |

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 |
| Imperial Beach | 5.9% | 17 | 1 | 5.9% | 17 | 1 |
| 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

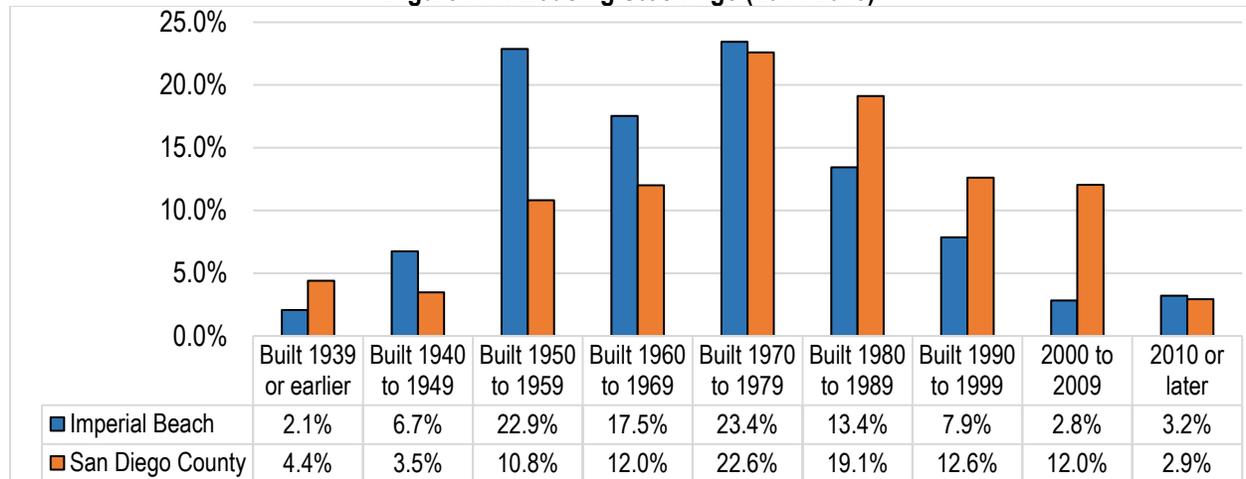
Housing age can be an important indicator of housing condition within a community. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs 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 Housing⁸, which measures “basic housing quality” throughout the nation. The basic housing quality metric is based

⁸ 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

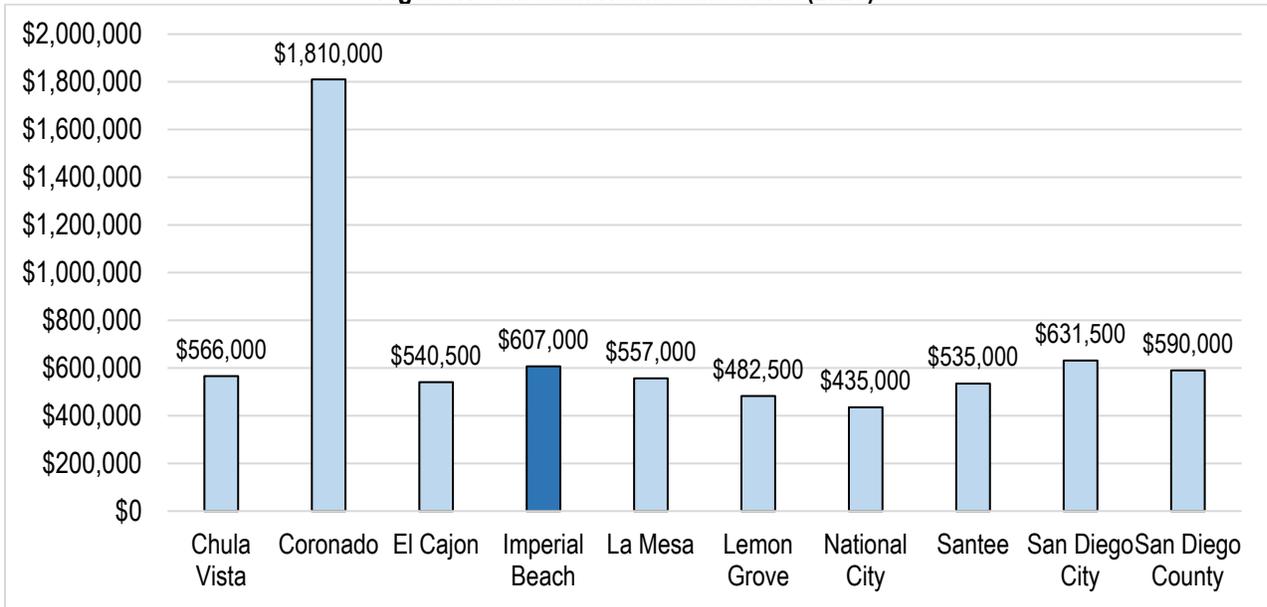
Housing costs can indicate whether housing is accessible to all economic segments of the community. This section summarizes the cost and affordability of the housing stock to Imperial Beach residents.

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% |
| Imperial Beach | 202 | \$240,000 | 15 | \$607,000 | 153% |
| 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 | Studio | 0/0 | \$0 | \$0.00 | \$450 | \$0 |
| | 1 BR | 80/4 | \$1,218 | \$1.80 | \$1,383 | \$1,517 |
| | 2 BR | 94/5 | \$1,496 | \$1.88 | \$1,200 | \$1,500 |
| | 3+ BR | 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 | |
| Extremely Low Income (30% of AMI) | | | | | | | | |
| 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 |
| Very Low Income (50% of AMI) | | | | | | | | |
| 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 |
| Low Income (80% of AMI) | | | | | | | | |
| 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 |
| Moderate Income (120% of AMI) | | | | | | | | |
| 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.

| Project Name | Total Units | Assisted Units | Funding Source | Earliest Date of Conversion |
|--|--------------------|-----------------------|-------------------------------|------------------------------------|
| 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 |
| Total | 189 | 186 | | |

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

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.

| Loan Type | Total Applicants | Approved | Denied | Other |
|----------------------------|-------------------------|-----------------|---------------|--------------|
| 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% |
| Total | 1,342 | 71.7% | 14.0% | 14.3% |

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, 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.⁹

⁹ 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

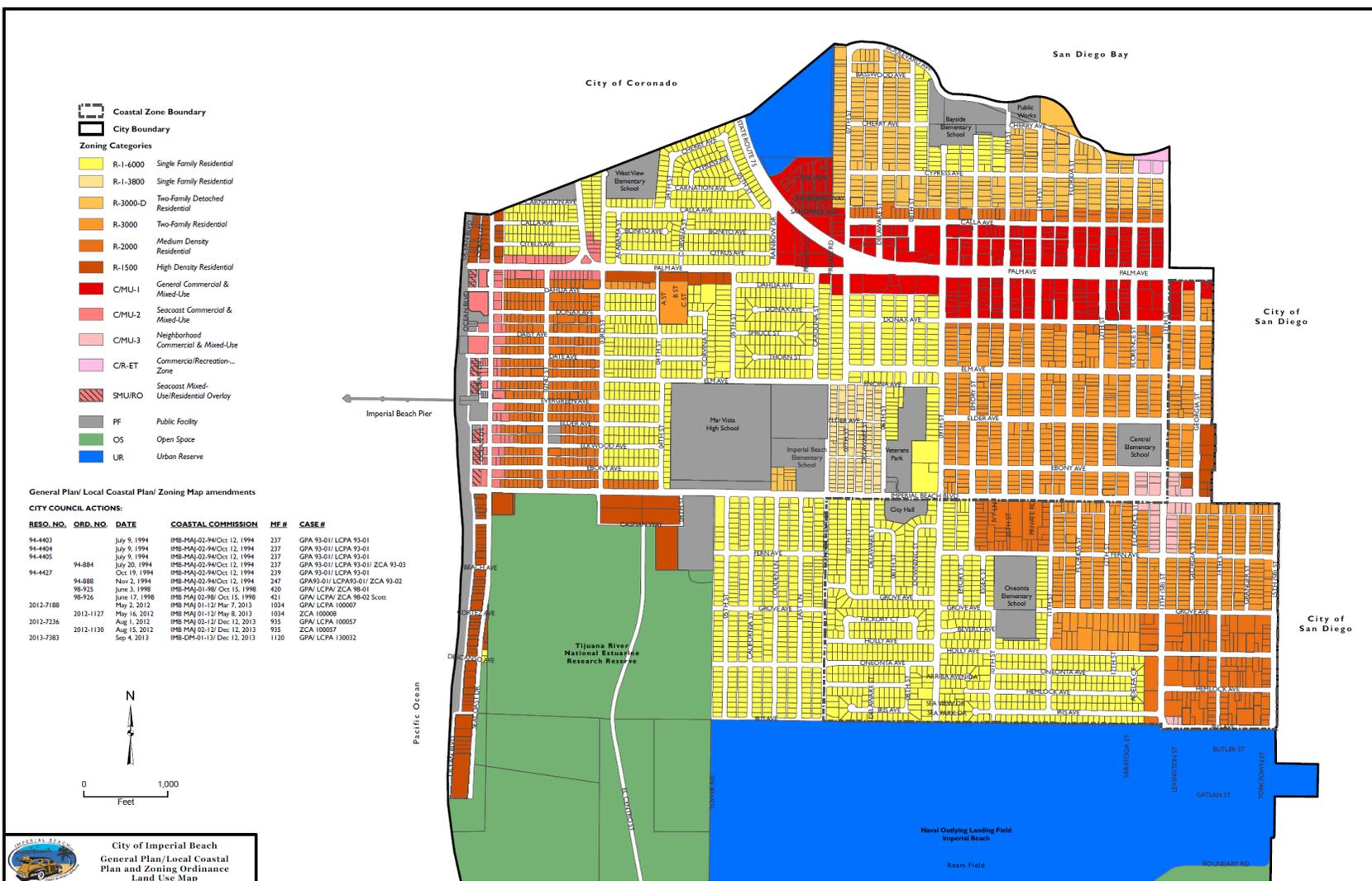
The Imperial Beach General Plan and Zoning Ordinance provide for a range of land use designations/zones in the City that can accommodate residential units. The City’s distribution of land use by zoning is presented in Figure H-9.

| General Plan Land Use Designation | Zoning Designation | Max. Density | Description |
|---|---------------------------|---------------------|---|
| 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 th 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.

| Table H-35: Mixed Use Density Bonus Development Incentives | |
|---|---|
| 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.

| Table H-36: Parking Requirements for Residential Uses | |
|--|---|
| Use | Parking Requirement |
| Dwelling units in the R-1-6000, R-1-3800, and R-3000 zones | 2 enclosed spaces per unit |
| Dwelling units in the R-2000 or R-1500 zones | 2 spaces per unit, 50 percent enclosed |
| 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 ¹ | -- |
| Multi-Family | -- | -- | -- | SPR | SPR | P ² | P ² | P ² |
| 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 ⁵ | CUP ⁵ | CUP ⁵ |
| Mixed Use | -- | -- | -- | -- | -- | P | P | P |
| Live/Work Unit ³ | -- | -- | -- | -- | -- | P | P | P |
| Senior Housing ⁴ | 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 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.¹⁰

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

¹⁰ 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).

| Review/Permit | Deposit |
|--|----------------|
| 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> | |

| Fee Type | Imperial Beach | National City | Chula Vista | San Diego |
|--|-----------------------|----------------------|--------------------|------------------|
| 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 |
| Imperial Beach | \$15,161.22 | \$11,262.71 | \$9,832.14 | \$21,010.37 |
| 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.

| Table H-41: Typical Permit Processing Timelines | | |
|--|------------------------|---|
| <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.¹¹ 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:

¹¹ 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). 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
- Master Fee Schedule (Development Fees):
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. 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 6th 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.

| Income Category (% of County AMI) | Number of Units | Percent |
|--|------------------------|----------------|
| 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% |
| Total | 1,329 | 100.0% |

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 6th 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 |
|--|--------------------|------------|------------|------------|----------------|--------------|
| RHNA | | 225 | 123 | 183 | 798 | 1,329 |
| Net Units Entitled (Not Permitted) as of 7/1/2020 | | | | | | |
| 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 |
| Subtotal: | | 0 | 0 | 3 | 74 | 77 |

| Table H-43: Credits Toward RHNA | | | | | | |
|--|-----------|------------|------------|------------|----------------|--------------|
| | Unit Type | Very Low | Low | Moderate | Above Moderate | Total |
| Net Units Pending Approval as of 7/1/2020 | | | | | | |
| 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 |
| Subtotal: | | 0 | 0 | 10 | 24 | 34 |
| Remaining RHNA | | 225 | 123 | 170 | 700 | 1,218 |

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% |
| <i>Source: City of Imperial Beach, 2020</i> | | | | | | | |

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.

| Table H-45: Vacant and Underutilized Sites Summary | | | | | |
|--|---------------------|--------------------|--------------------|---------------------------------------|----------------------|
| Zoning | Parcel Count | Total Acres | Max Density | Realistic Capacity (Net Units) | Affordability |
| Vacant | | | | | |
| 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 |
| Nonvacant | | | | | |
| 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 |
| Total | 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.¹² 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.

¹² 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

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
- 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.

| Table H-47: Summary Matrix of Fair Housing Issues and Actions for Mitigation | | |
|---|--|---|
| AFH Identified Fair Housing Issue | Contributing Factors | City Actions |
| Fair Housing Outreach and Enforcement Housing Mobility | <ul style="list-style-type: none"> ▪ Insufficient and inaccessible outreach and enforcement: <ul style="list-style-type: none"> - Lack of a variety of inputs media (e.g., meetings, surveys, interviews) | <ul style="list-style-type: none"> ▪ At least annually participate in the SDRAFFH meetings to coordinate regional responses to housing discrimination issues. ▪ Expand access to community meetings by publishing fair housing information in non-traditional media (such as social media |

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"> - Lack of marketing community meetings - Insufficient local public fair housing enforcement and testing | <p>platforms - Facebook, Instagram, Twitter, and YouTube, among others).</p> <ul style="list-style-type: none"> - City working in new agenda system to increase outreach and accessibility. - City Manager meets with community members routinely to discuss needs. ▪ Housing Programs Specialist to help implement a multi-lingual outreach and education program on housing-related matters. <ul style="list-style-type: none"> - 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. - 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. - Expand outreach and education on new State source of income protection (SB 329 and SB 229, see Program 6). ▪ 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. ▪ 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. |
| <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"> ▪ Concentration of minorities and LMI households and special needs groups: <ul style="list-style-type: none"> - Lack of private investments - Locating and type of affordable housing | <ul style="list-style-type: none"> ▪ Encourage mixed income strategy in housing development by: <ul style="list-style-type: none"> ▪ Promoting development of affordable housing across City (through mixed-use and infill opportunities) and near services (transit corridors). ▪ At mixed use development proposals/pipeline projects are identified, Housing Programs |

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"> - Inaccessible sidewalks, pedestrian crossings, or other infrastructure | <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"> ▪ 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. ▪ 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). ▪ 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. ▪ In 2022, ensure compliance with state law to facilitate affordable housing (ADUs), and Housing for Homeless and Special Needs (See Program 13). |
| | <ul style="list-style-type: none"> ▪ Substandard housing conditions: <ul style="list-style-type: none"> - Age of housing stock - Cost of repairs or rehabilitation | <ul style="list-style-type: none"> ▪ 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. ▪ Support nonprofits in pursuing funding for acquisition/rehabilitation of housing through the County's HOME program. |
| Protecting Existing Residents from Displacement | <ul style="list-style-type: none"> ▪ Displacement risk of low income residents due to economic pressure: <ul style="list-style-type: none"> - Unaffordable rents - Concentration of poverty in some census tracts | <ul style="list-style-type: none"> ▪ Target resources to displacement risk areas (northeastern and southeastern areas) and consider the community needs in outreach activities (language, meeting days/times, advertisement). ▪ Outreach to be part of Housing Programs Specialist tasks and will be provided in multiple languages, including Spanish. |

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"> - Availability of affordable housing | <p>Specifically, conduct weekly office hours to assist residents with housing programs.</p> <ul style="list-style-type: none"> ▪ The City will provide annual training on fair housing laws at public meetings with the intention of hosting additional meetings. ▪ Work with developers to support subsidized housing development where feasible. ▪ By 2022, develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities. ▪ For any meetings with developers the City will promote development of affordable housing. ▪ Promote development of affordable housing across City (mixed-use and infill) and near services (transit corridors) ▪ Improve housing mobility for HCV recipients by expanding knowledge of source of income protections (see Program 6) |

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

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
16290 Rostrata Hill Rd.
Poway, CA 92064

Falkenberg/Gilliam & Associates
Wesley Terrace Office
5343 Monroe Avenue
San Diego, CA 92115-3429

Legal Aid Society of San Diego
110 South Euclid Avenue
San Diego, CA 92114

Eric Walker
Seven-One Investments LLC
PO Box 1736
Bonita, CA 91908

Dave Sweeney
SD Alpha Development, Inc.
634 Adella Lane
Coronado, CA 92118

Michael W. Allen
Allen & Sons Construction
523 9th St.
Imperial Beach, CA 92193

League of Women Voters
7710 Balboa Ave
Ste. 224D
San Diego, CA 92111

Jeff Mattazaro
2086 Valley View Blvd.
El Cajon, CA 92019

Alliance of Californians for Community
Empowerment (ACCE)
569 Third Ave
Chula Vista, CA 91910

San Diego Workforce Partnership
1111 Bay Blvd STE E, Chula Vista, CA 91911

Joseph Scarlatti
Westone Management Consultants
152 W. Park Ave.
El Cajon, CA 92020

AmCal Housing
30141 Agoura Rd., Ste. #100
Agoura Hills, CA 91301-4332

South Bay Family Counseling Center
742 10th St,
Imperial Beach, CA 91932

Anthony Falletta
831 G. Avenue
Coronado, CA 92118

Lennar Homes of California- San Diego
Division
16465 Via Esprillo, Ste. 150
San Diego, CA 92127

MAAC Project
1355 Third Ave.
Chula Vista, CA 91911

David Brienza & Ralph Brienza
Blue Wave Enterprise, LLC
11273 Caminito Aclara
San Diego, CA 92126

Mercy Housing
1500 South Grand Avenue, Suite 100
Los Angeles, California 90015

Think Dignity
3525 30th Street
San Diego, CA 92104

Eric H. Wilson
Seacoast 630 LLC
3739 Rosecroft Ln.
San Diego, CA 92106

Wakeland Housing
1230 Columbia St,
San Diego, CA 92101

Chicano Federation
3180 University Ave #400,
San Diego, CA 92104

Hutchins/Braudaway Realty
George Braudaway, Partner
1138 Palm Ave
Imperial Beach, CA 91932

Shea Homes
San Diego Corporate Office
9990 Mesa Rim Rd,
San Diego, CA 92121

Council of Philippine American Organizations
of San Diego County, Inc.
COPAO Office Location
832 E Avenue
National City, CA 91950

Estean Lenyoum
Partner, Director of Urban Redevelopment
5465 Morehouse Drive, Suite 260
San Diego, CA 92121

Townspeople
4080 Centre St ste 201,
San Diego, CA 92103

Environmental Health Coalition
2727 Hoover Ave #202,
National City, CA 91950

Kevin Reese
Operation DH, LLC
124 Orange Ave. #203
Coronado, CA 92118

Lincoln Military Housing
2625 Le Hardy St #3544,
San Diego, CA 92136

United Way
4699 Murphy Canyon Rd,
San Diego, CA 92123

Integral Communities
2235 Encinitas Blvd. Suite 216
Encinitas, CA 92024

Affirmed Housing
13520 Evening Creek Dr N,
San Diego, CA 92128

Neighborhood House Association
841 South 41 St.,
San Diego, CA, 92113

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.



3939 Iowa Street, Ste. 1
 San Diego, CA 92104
 Phone: (619) 239-6693
 Fax: (619) 239-5623
www.housingsandiego.org

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

Re: Draft 6th 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 6th 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 5th 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



Appendix B: Review of Previous Housing Element (2013-2021)

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 |
|--|---|---|---|--|
| <i>Housing Conservation and Improvement</i> | | | | |
| 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. <i>Continued Appropriateness:</i> The 6 th 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"> • A new fire engine for the Imperial Beach Fire Station • Park improvements at Rose Teeple Memorial Park • Imperial Beach Blvd Pedestrian Crosswalk Project • Rose Teeple Park Improvements Project • Marina Vista Senior Center Phase I Design • A new fire engine for the Imperial Beach Fire Station |

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>Continued Appropriateness: 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>Continued Appropriateness: This program is removed from the 6th 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>Continued Appropriateness: 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"> • 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. | <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"> • 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 <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>Continued Appropriateness: Monitoring of Coastal Zone housing activities is required the State law. The 6th cycle Housing Element will continue this program.</p> |
| Housing Assistance | | | | |
| 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 & 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>Continued Appropriateness: 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 (<50 percent AMI).</p> <p>Continued Appropriateness: The HCV program remains one of the few resources for extremely low income households. The 6th 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>Continued Appropriateness: Resources for homebuyer assistance are limited, especially in light of the rising home prices. This program is continued in the 6th cycle Housing Element.</p> |
| Provision of Adequate Housing Sites | | | | |
| 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>Continued Appropriateness: The 6th 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>Continued Appropriateness: The updated sites inventory includes development potential in the Mixed Use zones. This program is merged with Program 9.</p> |
| Removal of Government Constraints | | | | |
| 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>Continued Appropriateness: 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 6th 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>Continued Appropriateness: Recent changes to State density bonus law necessitate an update to the City's Density Bonus Ordinance. The 6th 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"> • Manufactured Homes • Transitional and Supportive Housing • Single-Room Occupancy Units • Reasonable Accommodation for Persons with Disabilities | <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"> • Families with dependent children |

Table B-1: Review of Accomplishments

| Prog # | Program Name | Description | 2013-2021 Objectives | Progress and Continued Appropriateness |
|---|----------------------|--|--|--|
| | | <ul style="list-style-type: none"> • Senior Housing • Employee Housing | | <ul style="list-style-type: none"> • Working families • Elderly families • Disabled families • Veterans • Homeless <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>Continued Appropriateness: 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 6th cycle Housing Element includes an updated program to address these requirements.</p> |
| Promotion of Equal Housing Opportunity | | | | |
| 14 | Fair Housing Program | <p>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> | <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>Continued Appropriateness: New State law mandates programs and policies to further fair housing in the community. This program is expanded in the 6th cycle Housing Element to include specific actions from the San Diego Regional Analysis of Impediments to Fair Housing Choice completed in Summer 2020.</p> |

| Table B-2: Progress in Achieving Quantified Objectives 2013-2021 | | |
|--|-----------------------------|-----------------|
| Program Category | Quantified Objective | Progress |
| New Construction (RHNA 2013-2021¹) | | |
| Very Low* | 63 | 3 |
| Low | 48 | 32 |
| Moderate | 45 | 5 |
| Above Moderate | 98 | 305 |
| Total | 254 | 345 |
| Rehabilitation (Clean and Green) | | |
| Extremely Low | 5 | 12 |
| Very Low | 5 | |
| Low | 20 | |
| Moderate | 30 | |
| Above Moderate | - | |
| Total | 60 | 12 |
| Housing Assistance (Housing Choice Voucher) | | |
| Extremely Low | 215 | 330 |
| Very Low | 200 | 50 |
| Low | - | 15 |
| Moderate | - | - |
| Above Moderate | - | - |
| Total | 415 | 395 |
| Housing Conservation (At-Risk Housing) | | |
| Extremely Low | 45 | 45 |
| Very Low | 44 | 44 |
| Low | | |
| Moderate | - | - |
| Above Moderate | - | - |
| Total | 99 | 99 |
| ¹ Numbers listed show progress as of APR 2019. ² APR only shows "very low" income category and does not separate them into extremely low and very low category. | | |

Appendix C: Residential Sites Inventory

| 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 th 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 th 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 th 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 th 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 th 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 th 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 th 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 th 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 th 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 th 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 th 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 10th</p> |
|  <p>APN 6262010600- 730 Palm</p> |  <p>APN 6262820600- 737 Emory</p> |  <p>APN 6270110400- 737-753 13th</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 13th</p> |
|  <p>APN 6262222500- 1058 Palm</p> |  <p>APN 6265421100- 1070 13th</p> |  <p>APN 6330312000- 1133 13th</p> |  <p>APN 6261700500-1144 Palm</p> |

Figure C-1: Existing Conditions Along Mixed Use Corridors



APN 6261700500- 1144 Palm



APN 6263022000- 1155 Palm



APN 6263020200- 1177 Palm



APN 6330313000- 1183 13th



APN 6330313000-1183 13th



APN 6262412700- 1200 Palm



APN 6263110100- 1205 Palm



APN 6263111400- 1231 Palm



APN 6262412800- 1240 Palm



APN 6270111900- 1331 Palm

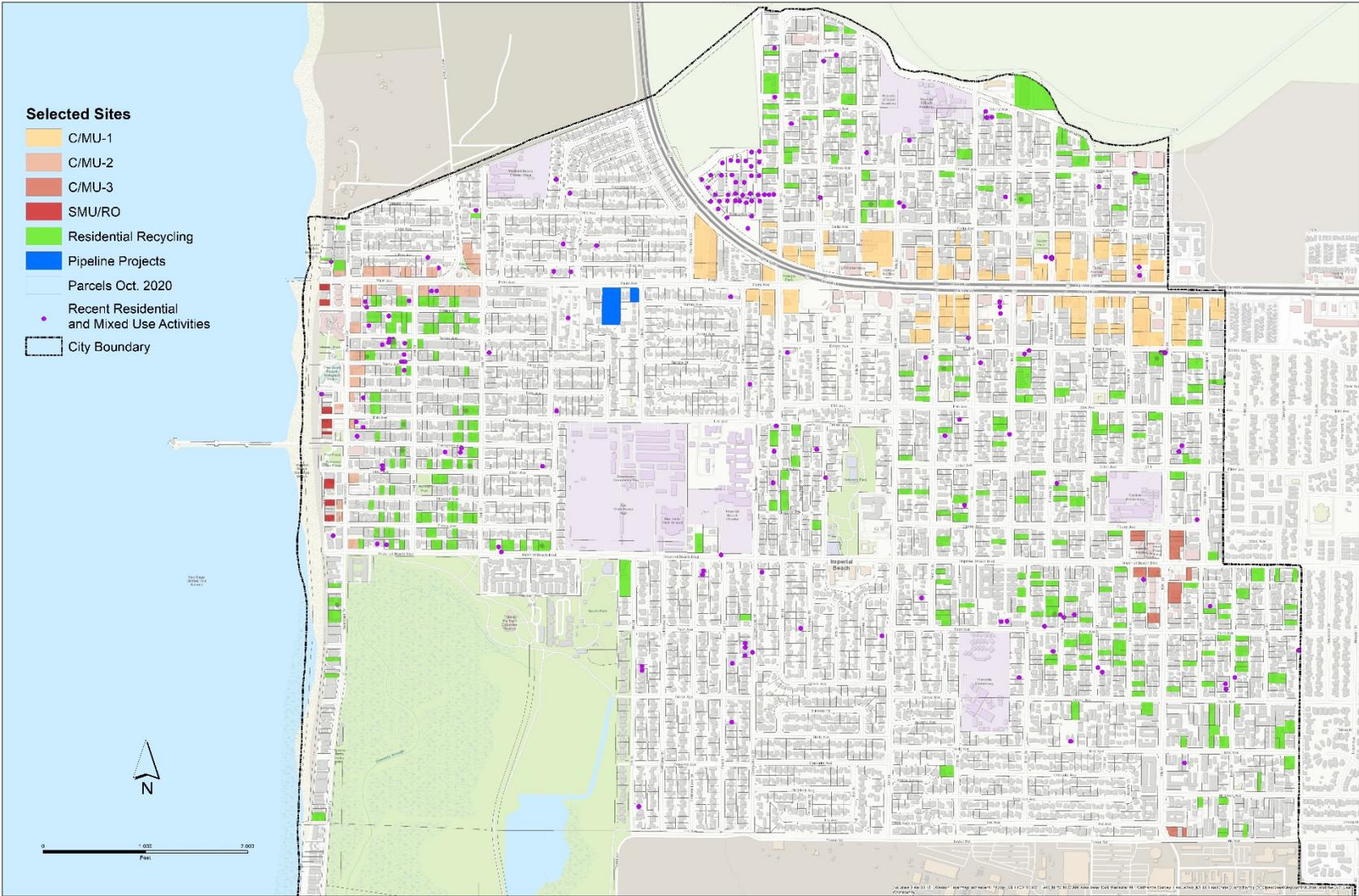


APN 6270121000- 1351 Palm



APN 6270121000- 1351 Palm

Figure C-2: Location of Sites for RHNA



Appendix D: Fair Housing Assessment

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:

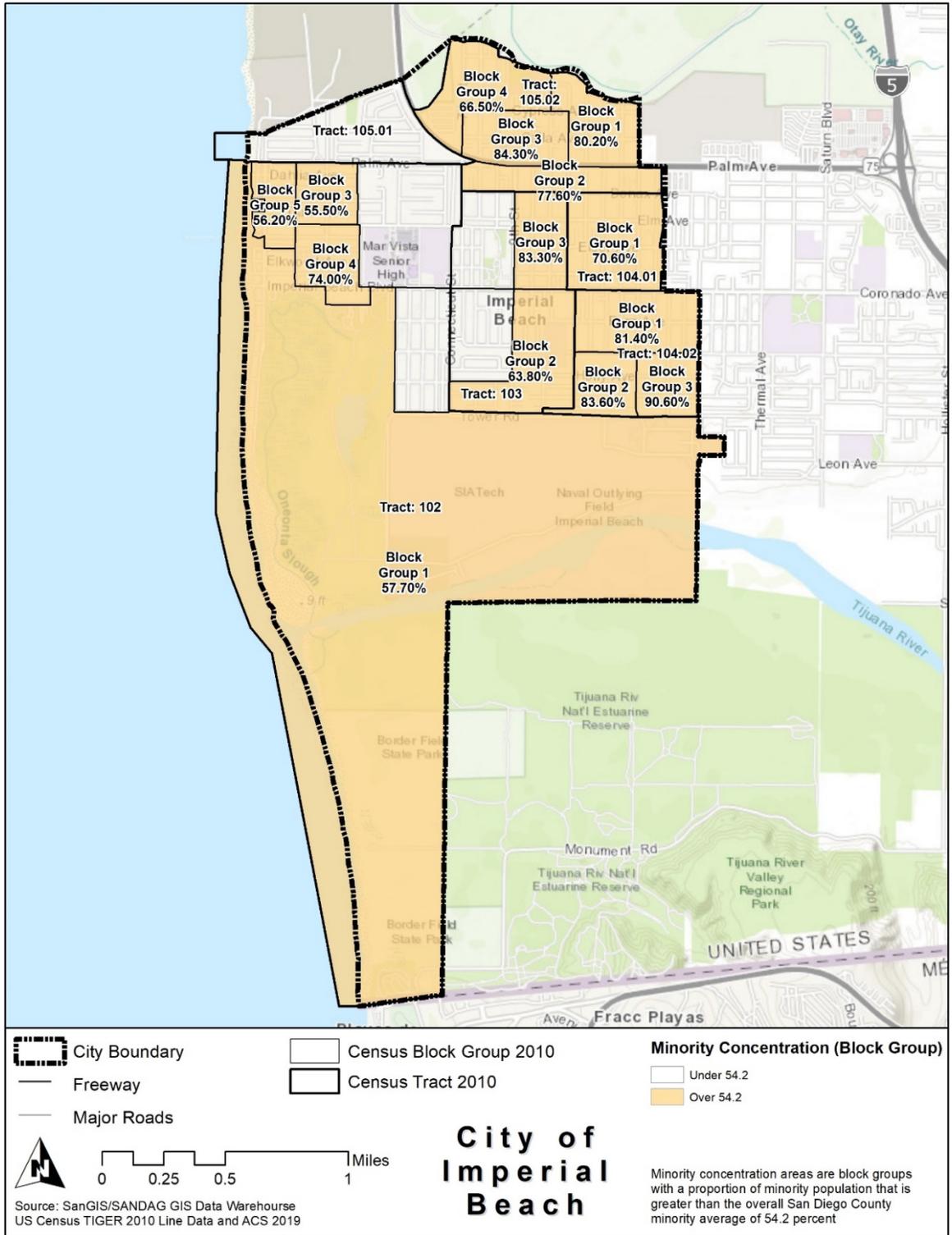
- Poverty: Tracts with at least 30 percent of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

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).

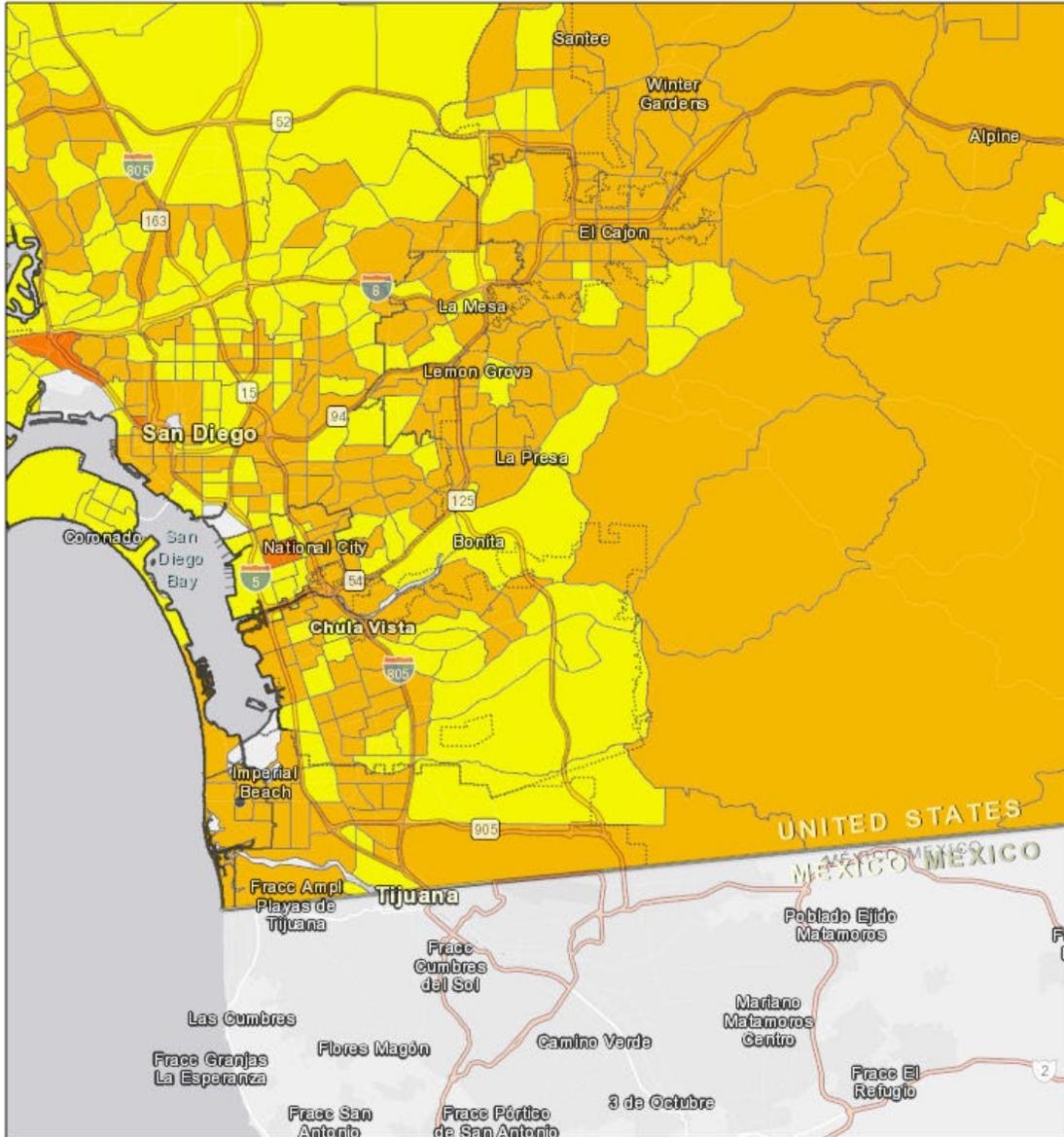
Familial Status

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

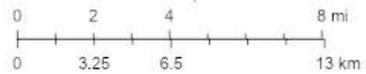
Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

1:288,895

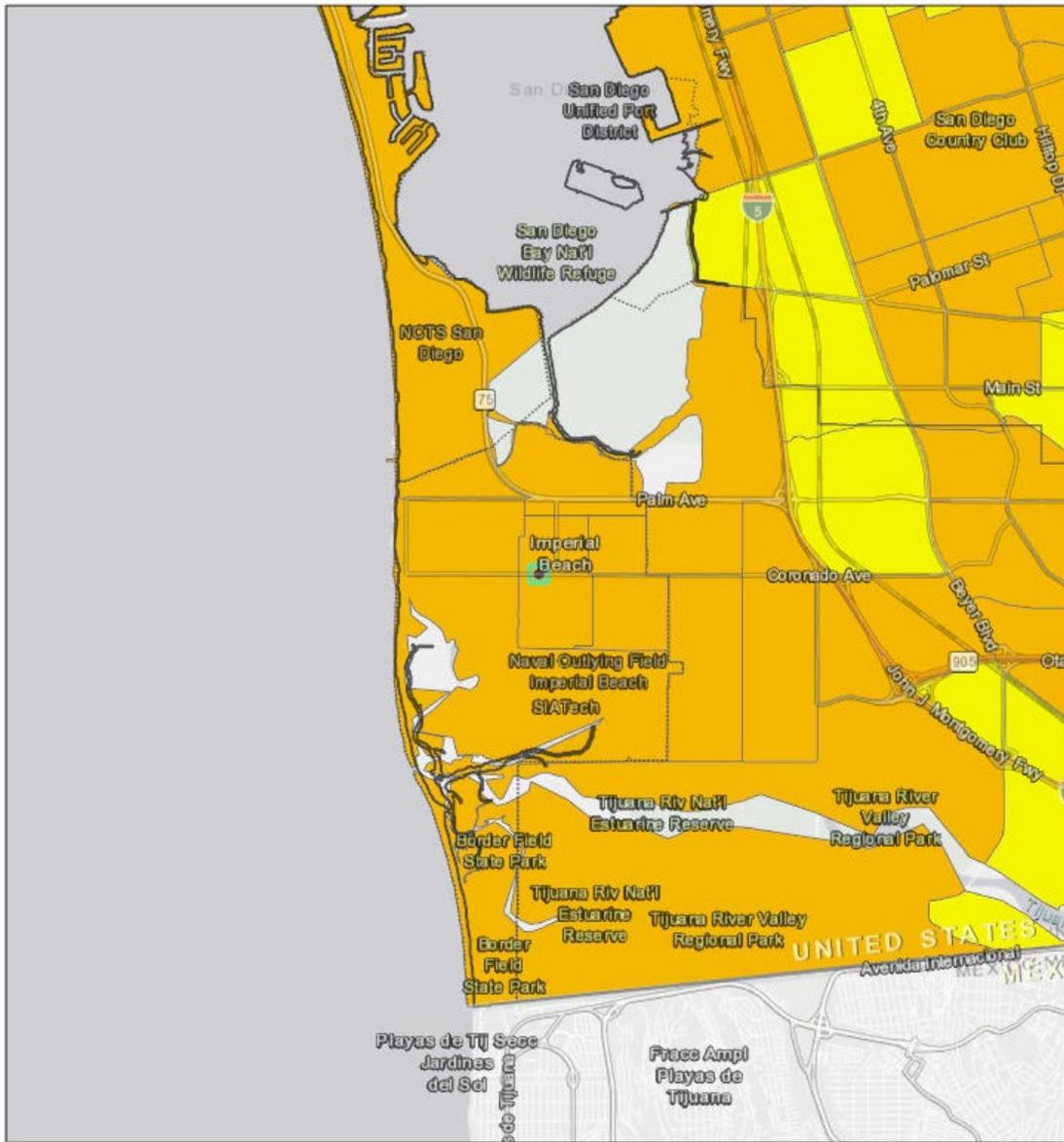


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CA HCD

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

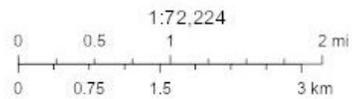
City

County

Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%



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CA HCD
Esri, HERE | PlaceWorks 2021, County Health Rankings 2021 | OEHH, CalEPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks

Figure D-4: Percent Population of Adults Living Alone – Imperial Beach

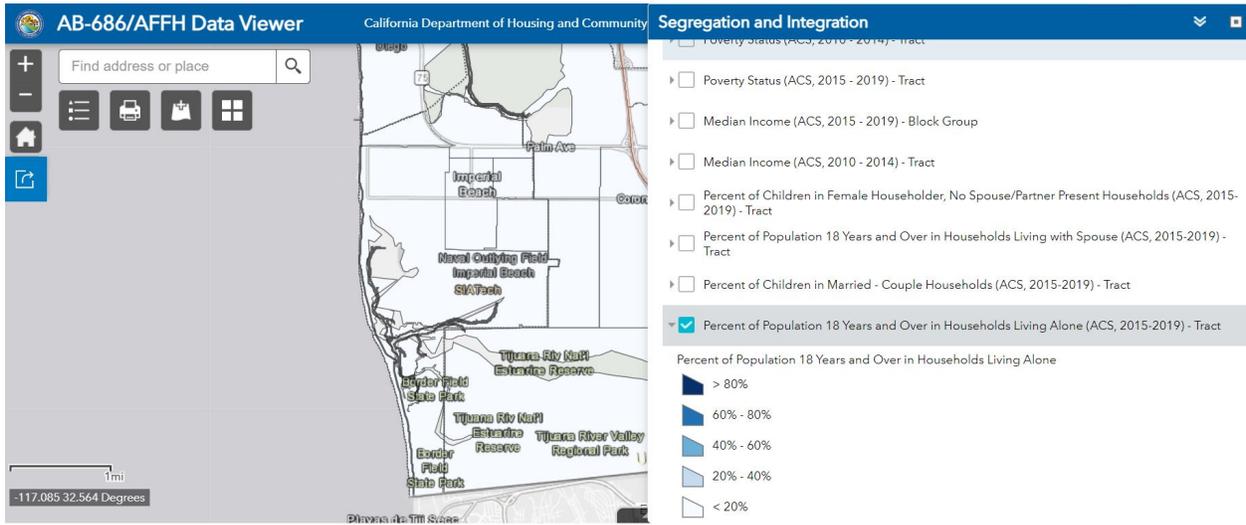


Figure D-5: Percent Population of Adults Living with their Spouse - Imperial Beach

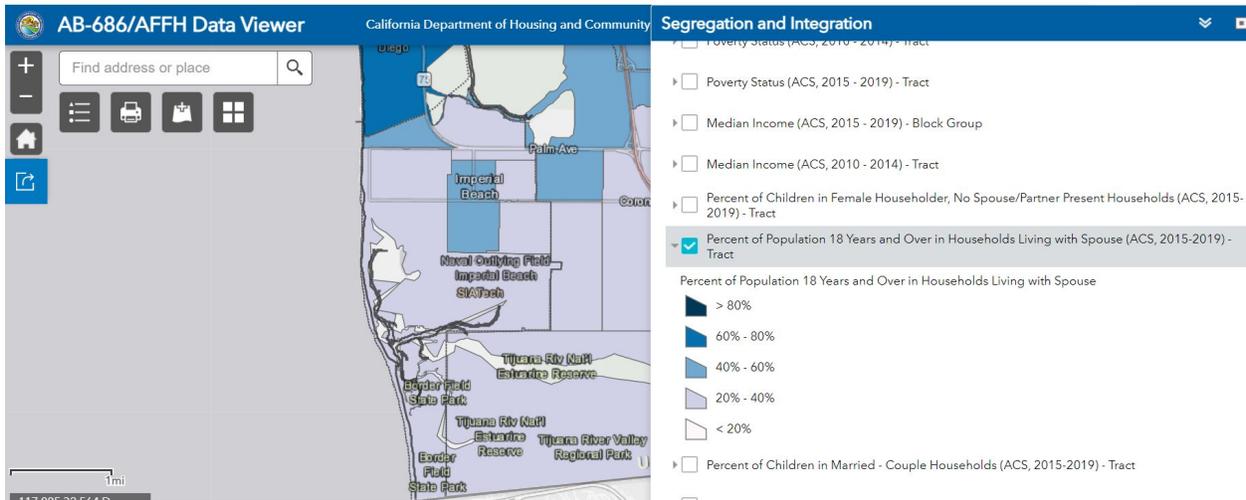


Figure D-6: Percent of Children in Married Couple Households - Imperial Beach

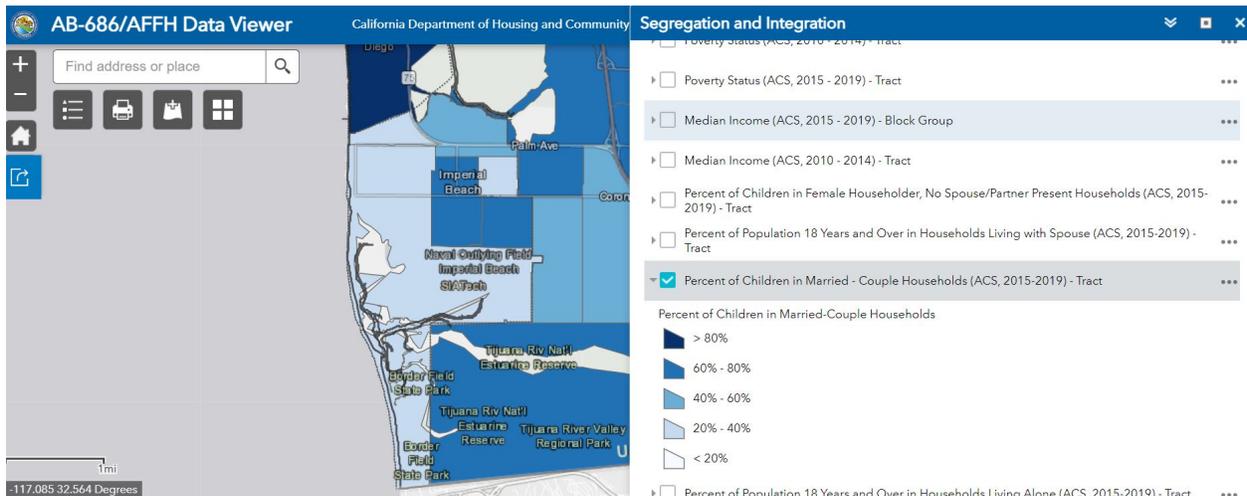
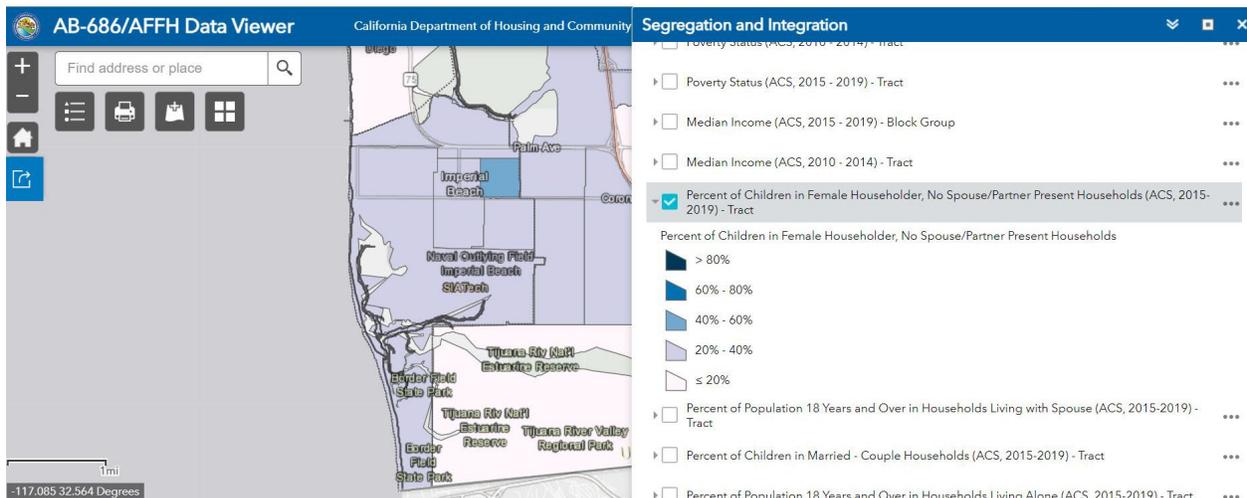


Figure D-7: Percent of Children in Single Female-Headed Households- Imperial Beach



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

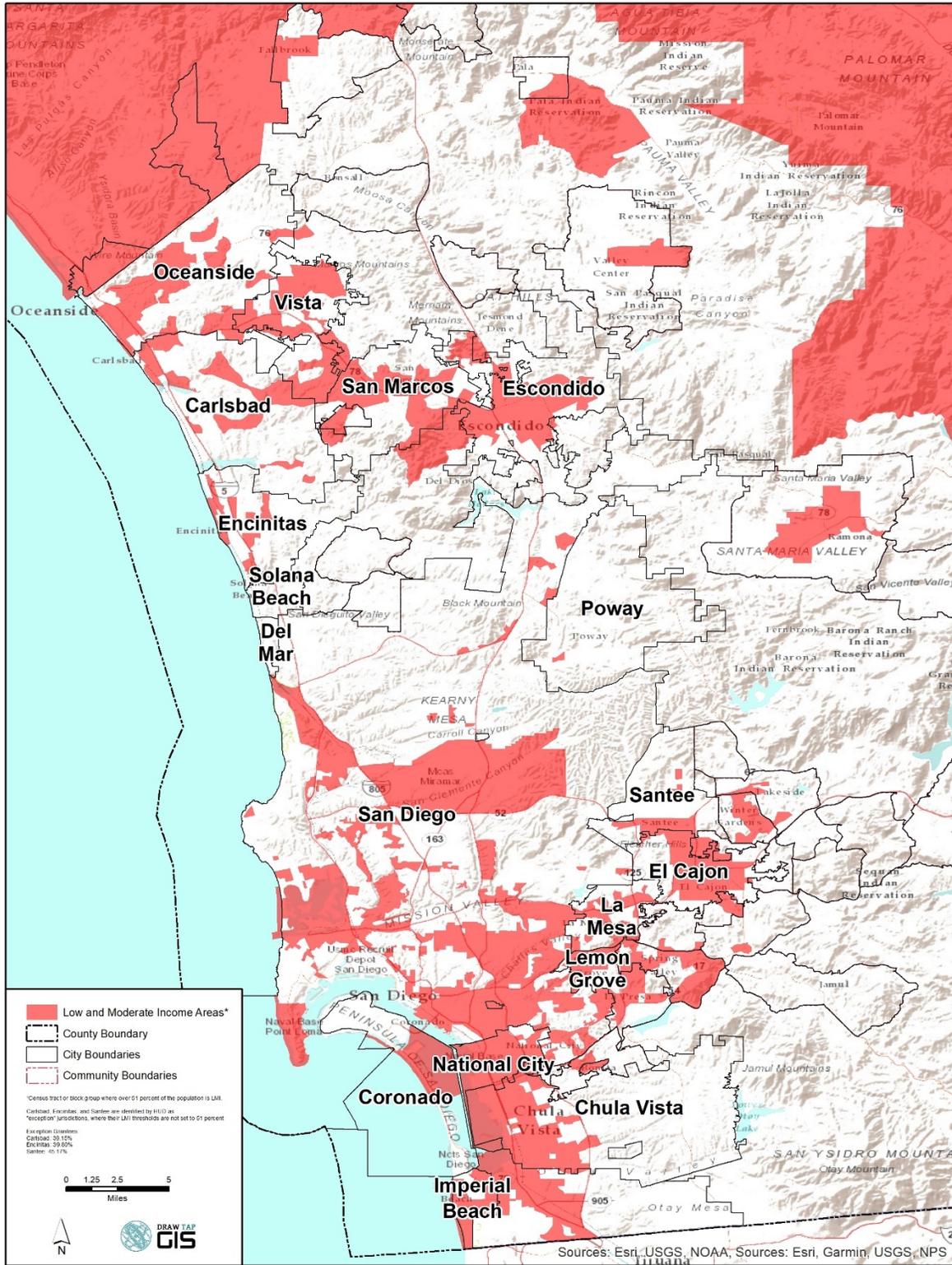
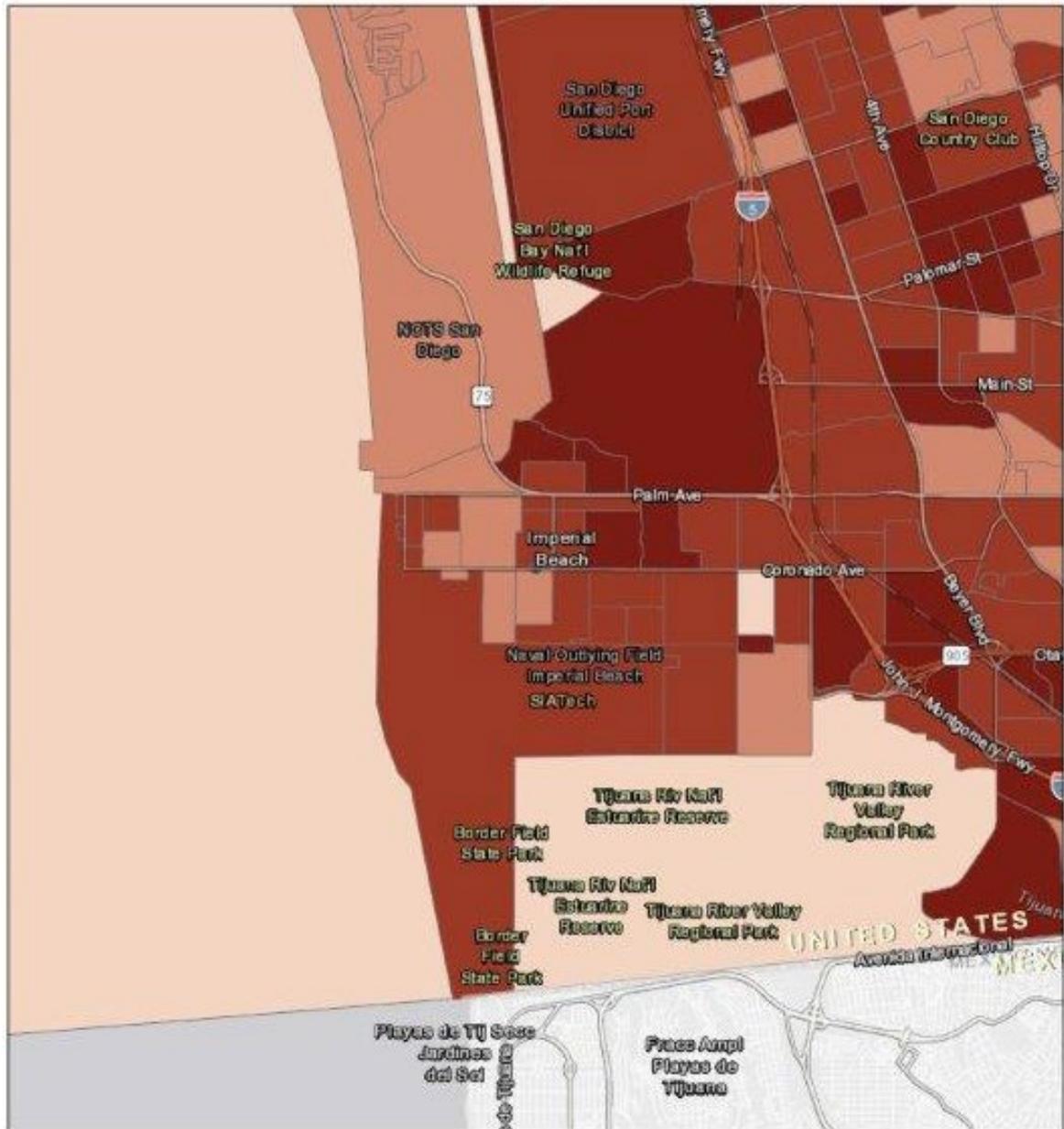
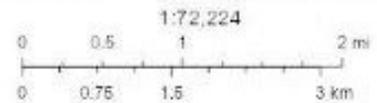
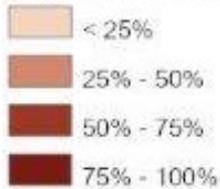


Figure D-9: Low and Moderate Income (LMI) Areas in Imperial Beach



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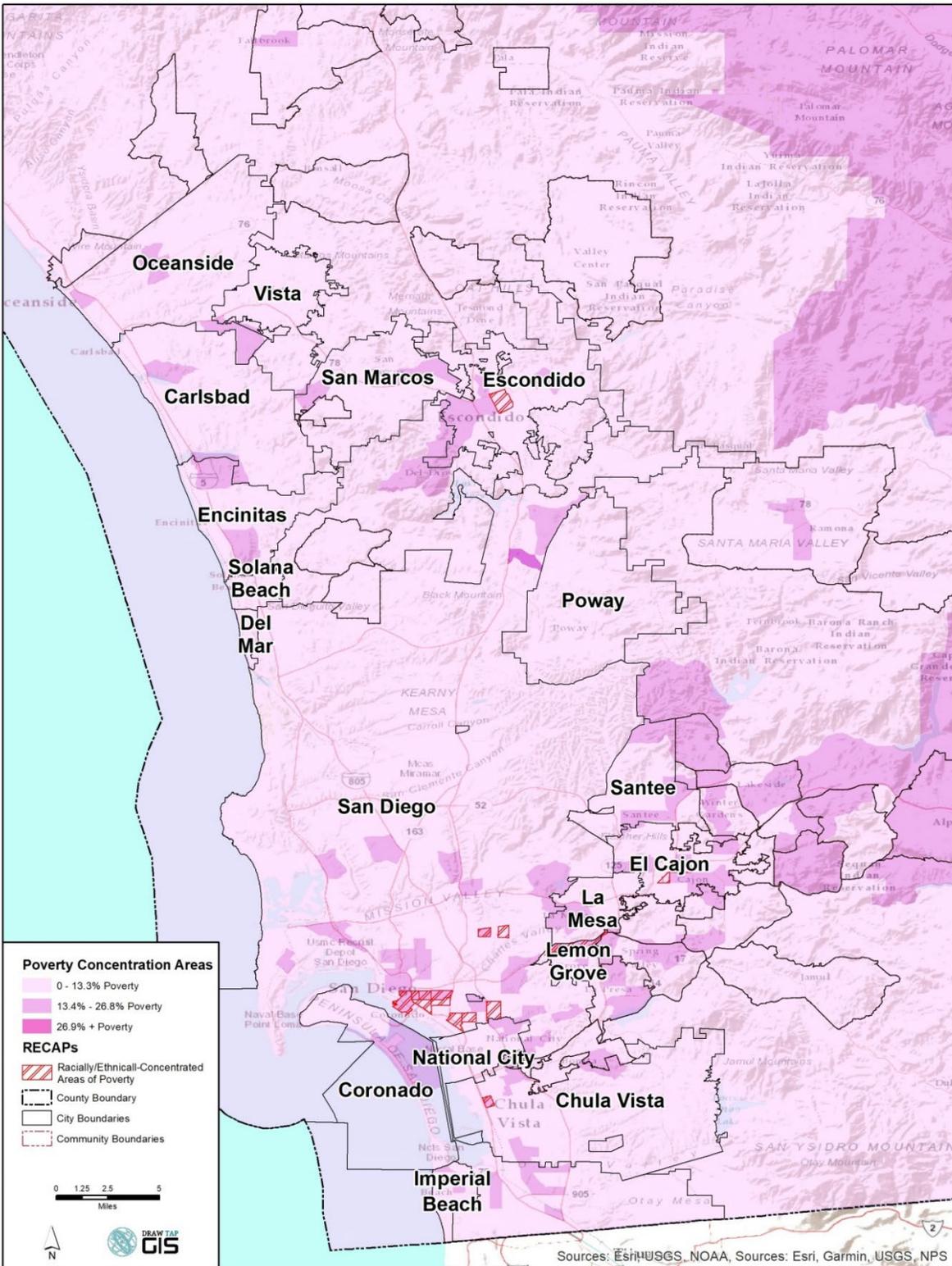
Low to Moderate Income Population (HUD) - Block Group



Esri, HERE, DeLorme, Garmin, OpenStreetMap contributors, and the GIS user community

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.¹³ 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.”

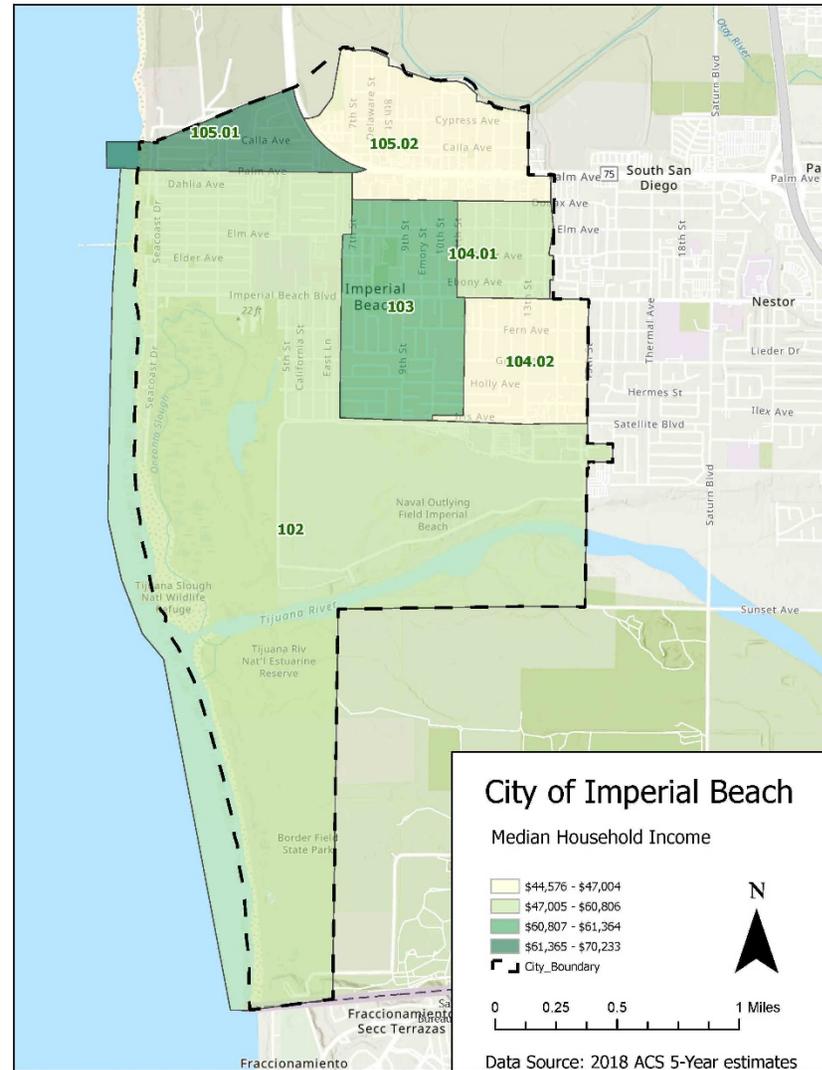
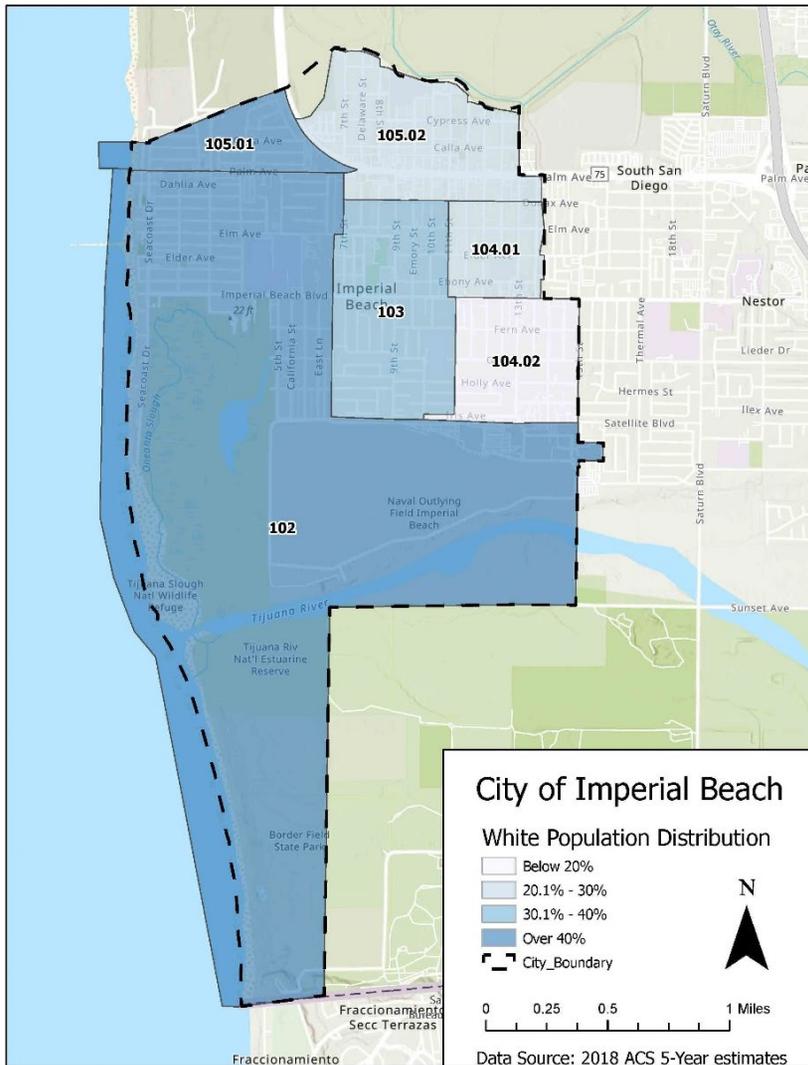
RCAAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percent White population and median household income as proxies to identify potential areas of affluence. As Figure D-11 shows, census tracts with a large white population (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).

| | Imperial Beach | Coronado | Chula Vista | National City | San Diego County |
|-------------------------|-----------------------|-----------------|--------------------|----------------------|-------------------------|
| Median HH Income | | | | | |
| All Households | \$51,838 | \$101,520 | \$76,354 | \$46,032 | \$74,855 |
| White alone | \$65,031 | \$104,757 | \$83,204 | \$53,182 | \$84,785 |
| White Population | 31% | 74% | 18% | 10% | 46% |

Source: 2018 American Community Survey, 5-year estimates.

¹³ 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.¹⁴ 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.

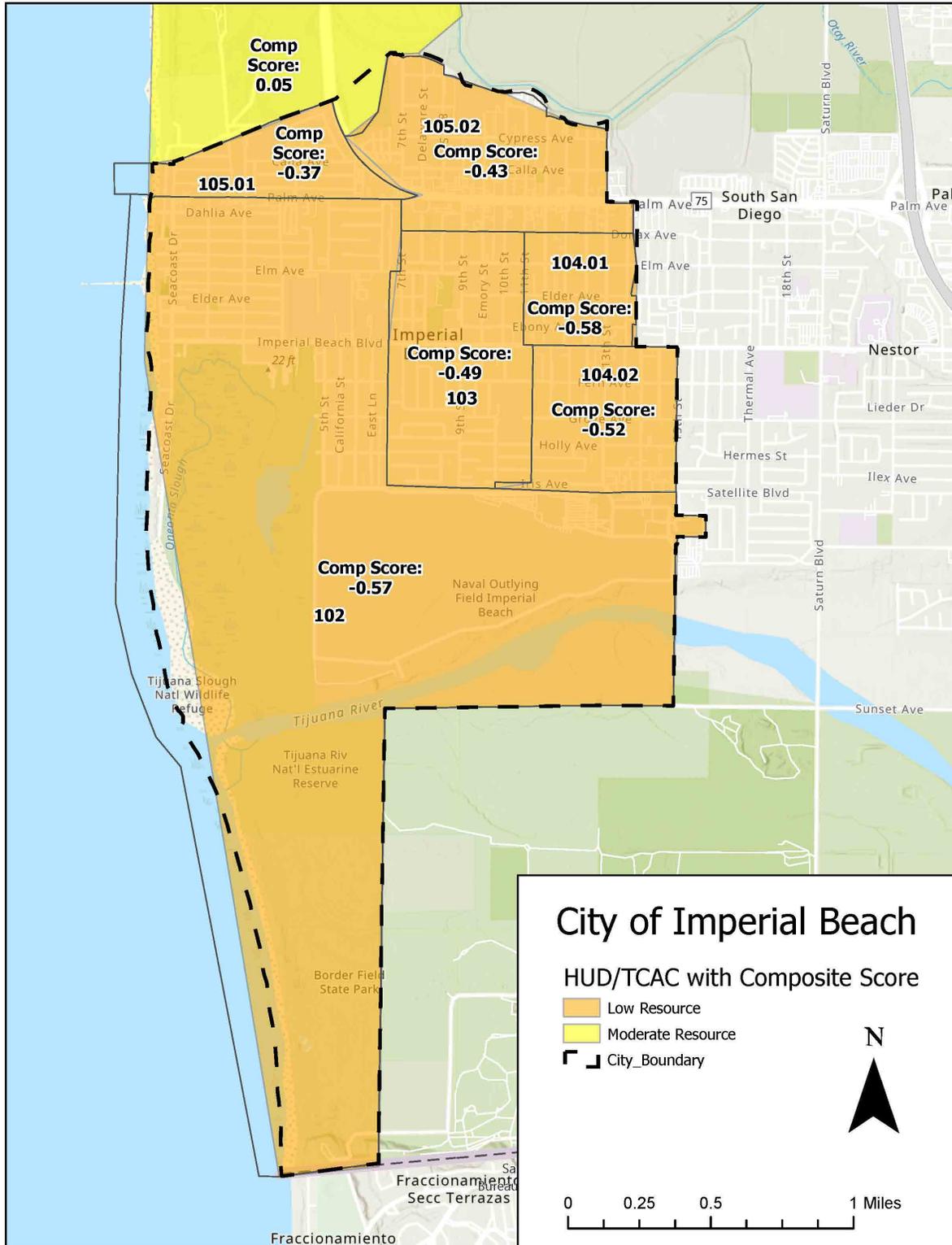
Table D-3: Opportunity Map Scores and Categorization (2021)

| 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

¹⁴ 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).¹⁵ 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 2016.¹⁶ 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 County¹⁷, 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

¹⁵ 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,

¹⁶ 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.

¹⁷ 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

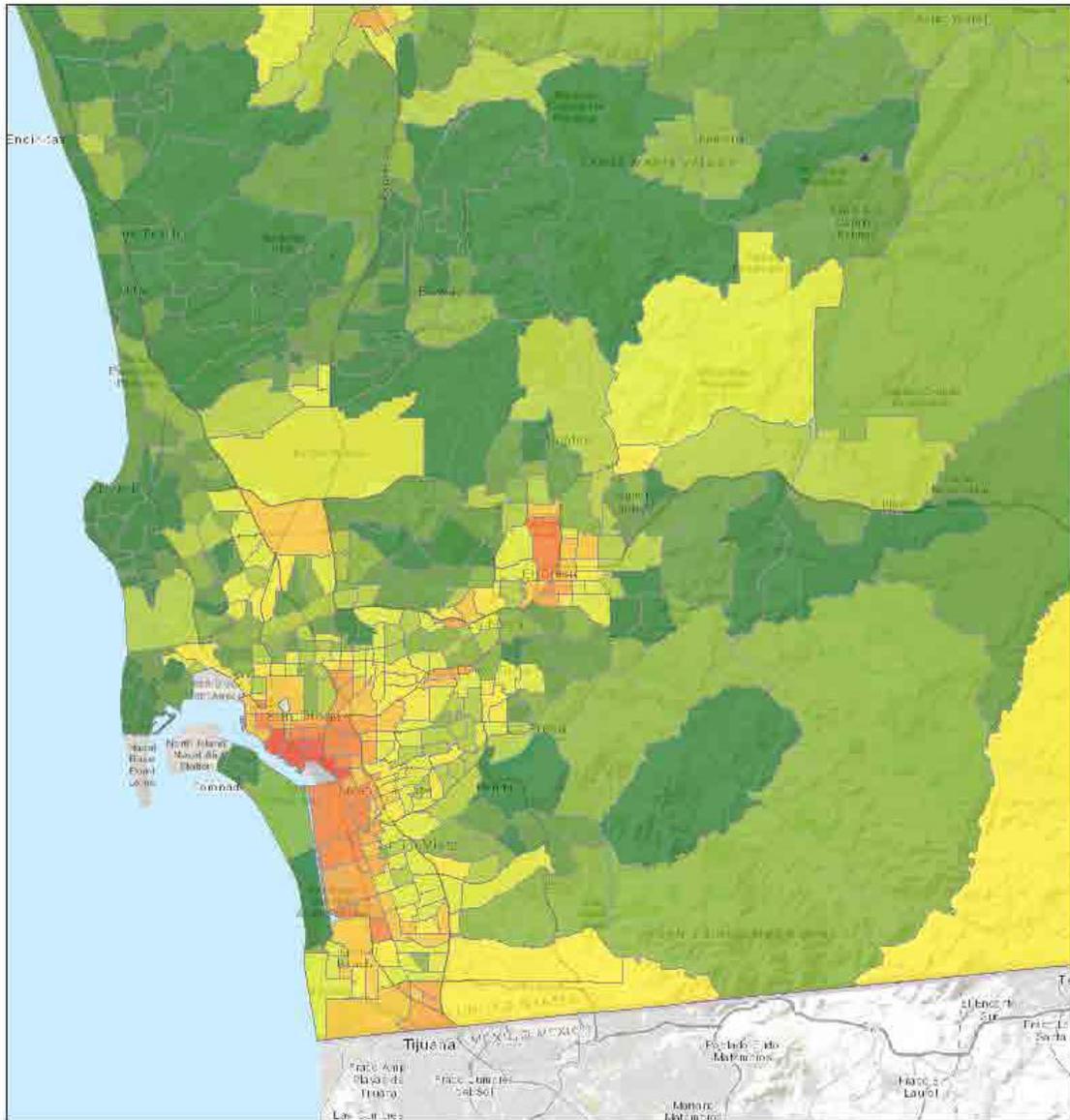
All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided by the 2020 Regional AI, Imperial Beach's score All Transit Performance score of 6.7 was among the highest 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

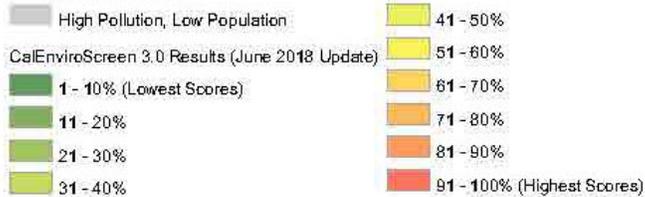
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). High 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.

| Table D-4: Access to Opportunity Indicators- Imperial Beach and San Diego County | | | | |
|---|-----------------------|------------|-------------------------|-----------------|
| | Imperial Beach | | San Diego County | |
| Poverty Rate | | | | |
| 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% | |
| School Proficiency | | | | |
| Total Title I Schools | 5 | | 656 | |
| Total Schools | 6 | | 412 | |
| % of Schools | 83.3% | | 62.8% | |
| Unemployment Rate | | | | |
| February 2021 | 10.1% | | 7.2% | |
| Job Proximity | | | | |
| <29 mins. | 51.5% | | 62.7 | |
| 30-59 mins. | 41.8% | | 30.4 | |
| 60 mins. or more | 6.7% | | 7.0* | |
| Transit Metrics | | | | |
| 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 | |
| CalEnviroScreen Percentile | | | | |
| 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; https://alltransit.cnt.org/metrics/, accessed March 30, 2021. CalEnviroScreen 3.0 Results (June 2018 Update).</i></p> | | | | |

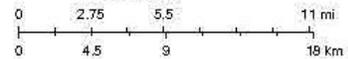
Figure D-13: CalEnviroScreen 3.0 Percentile Scores



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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.

| With Housing Problem | White | Black | Asian | Am Ind | Pac Islander | Hispanic | Other | All |
|-----------------------------|--------------|--------------|--------------|---------------|---------------------|-----------------|--------------|------------|
| Imperial Beach | | | | | | | | |
| 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% |
| San Diego County | | | | | | | | |
| 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 gentrified¹⁸ 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.

¹⁸ 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

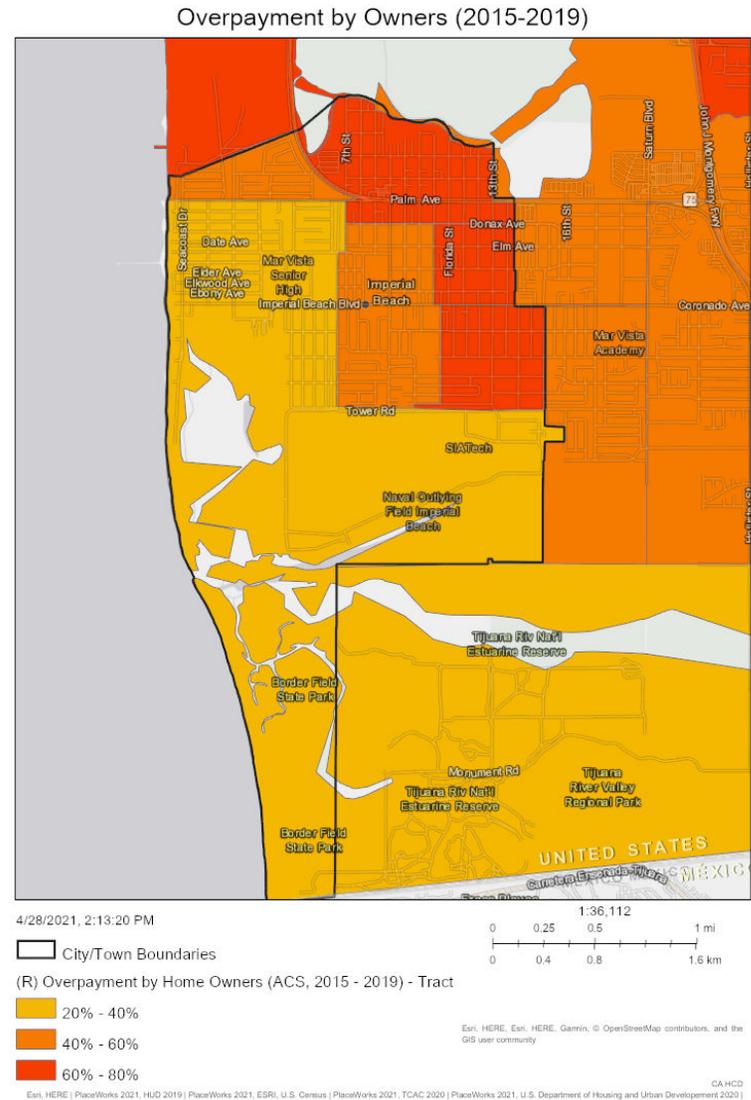
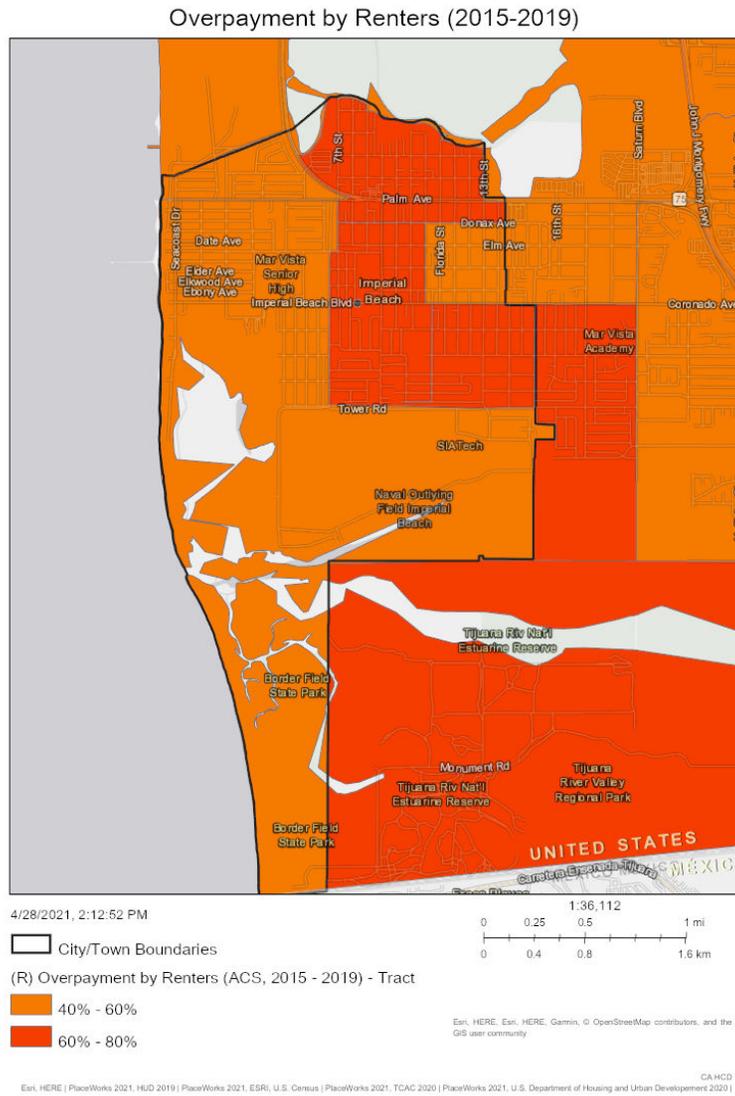


Figure D-15: Distribution of Overcrowded Households

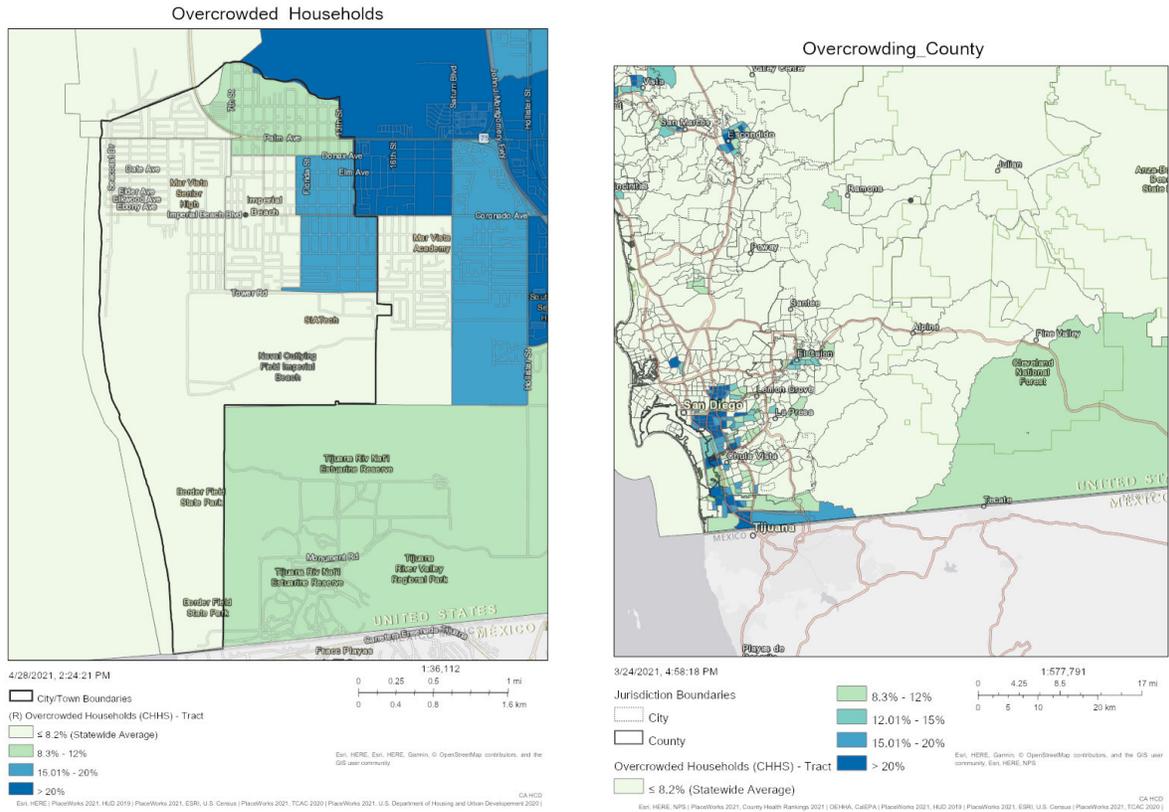


Figure D-16: Displacement Indicators
 (A) Change in Median Household Income (2000-2015)

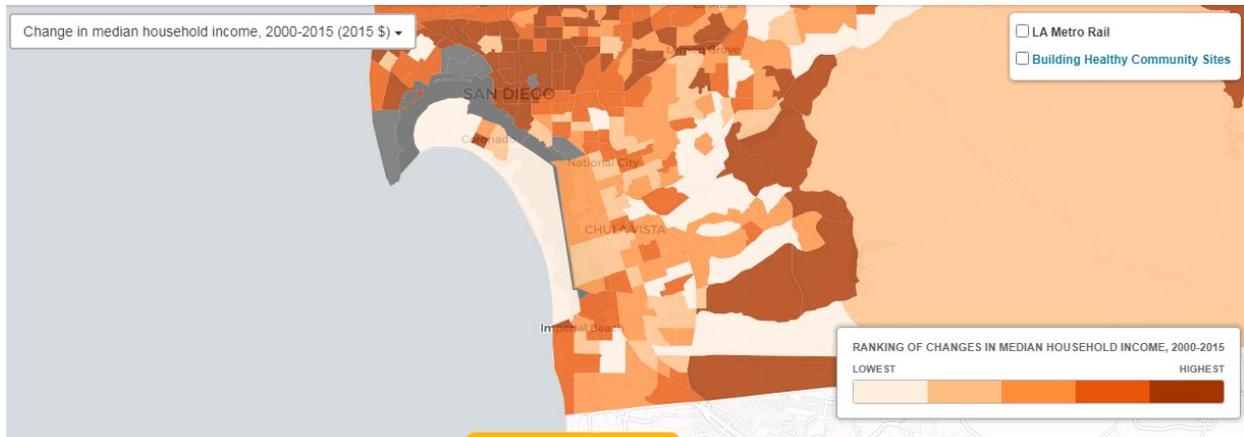
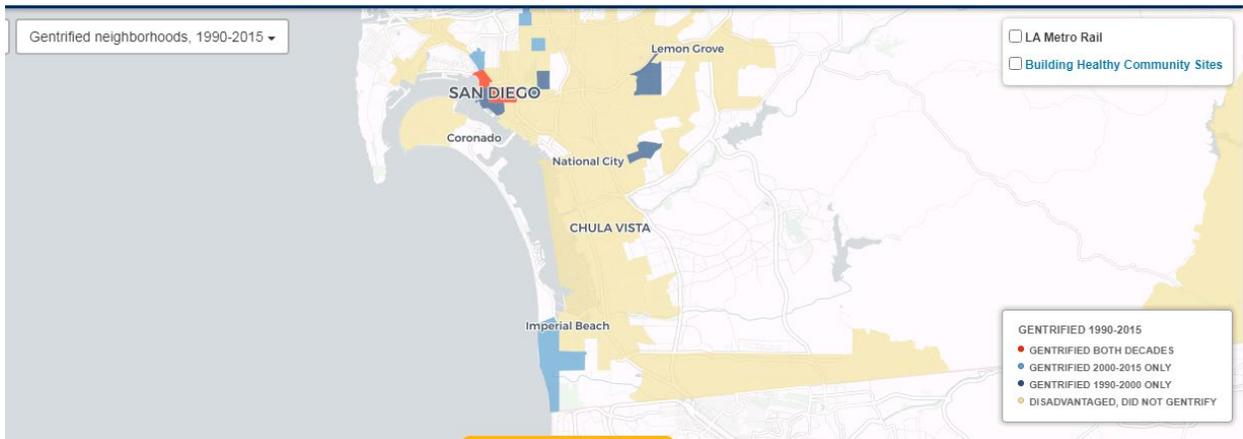


Figure D-16: Displacement Indicators (Continued)

(B) Change in Median Gross Rent (2000-2015)

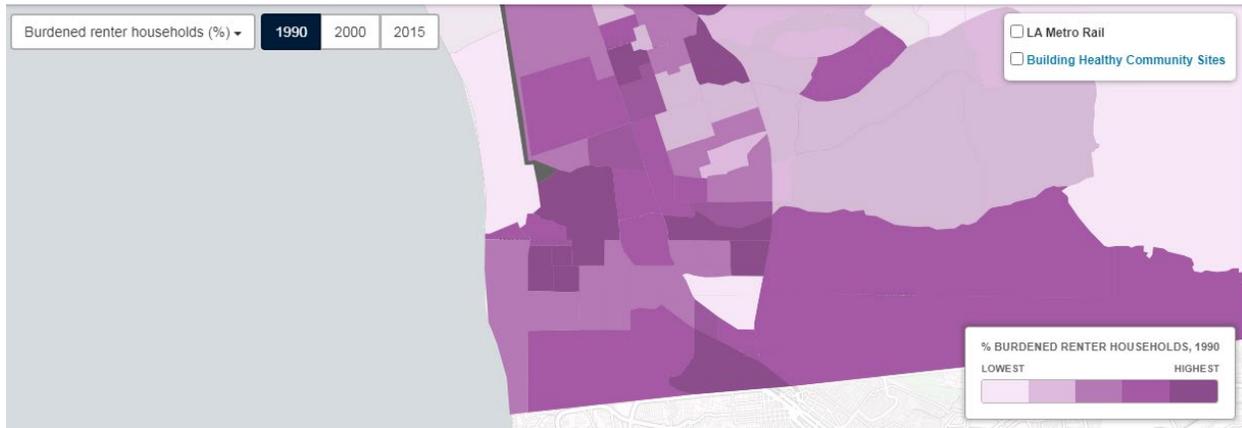


(C) Gentrified Neighborhoods (1990-2015)



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.

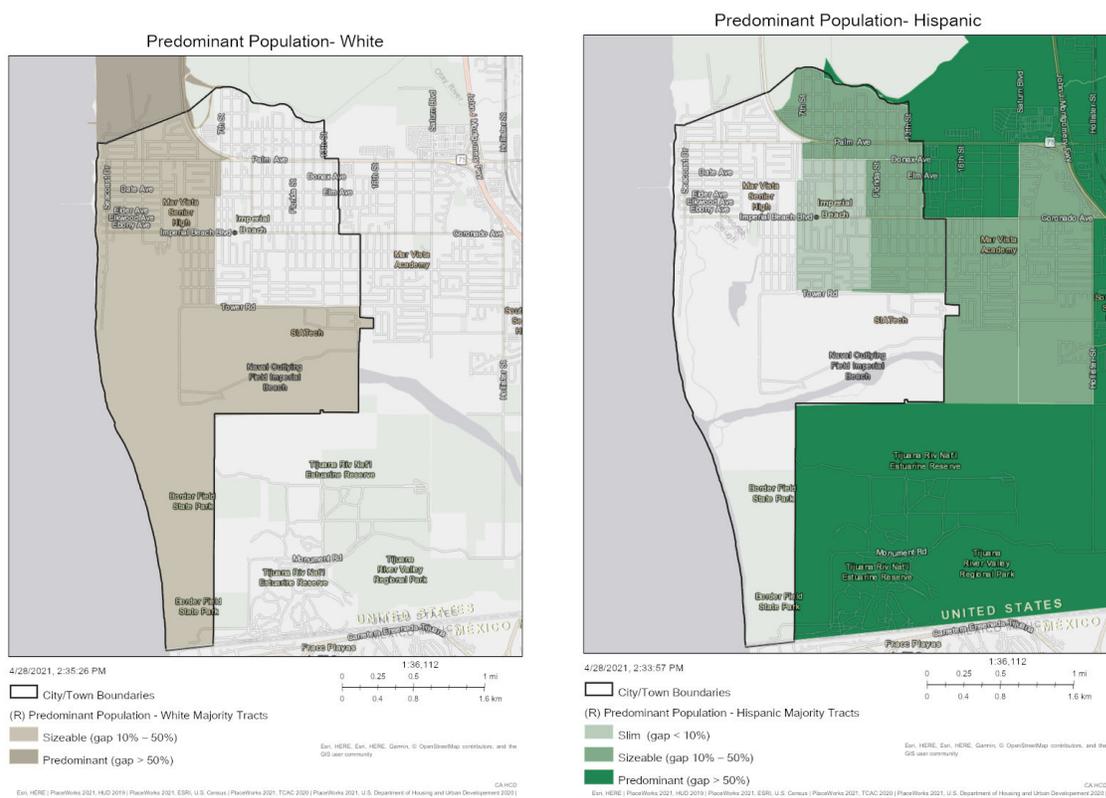
The northeast and southeast portions of Imperial Beach are situated closest to the transportation corridors of Palm Ave, 13th St. and Imperial Beach Blvd. Complete-streets projects in recent years have been focused along these corridors, which have enhanced multi-modal transportation that enhances accessibility 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 Population¹



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:

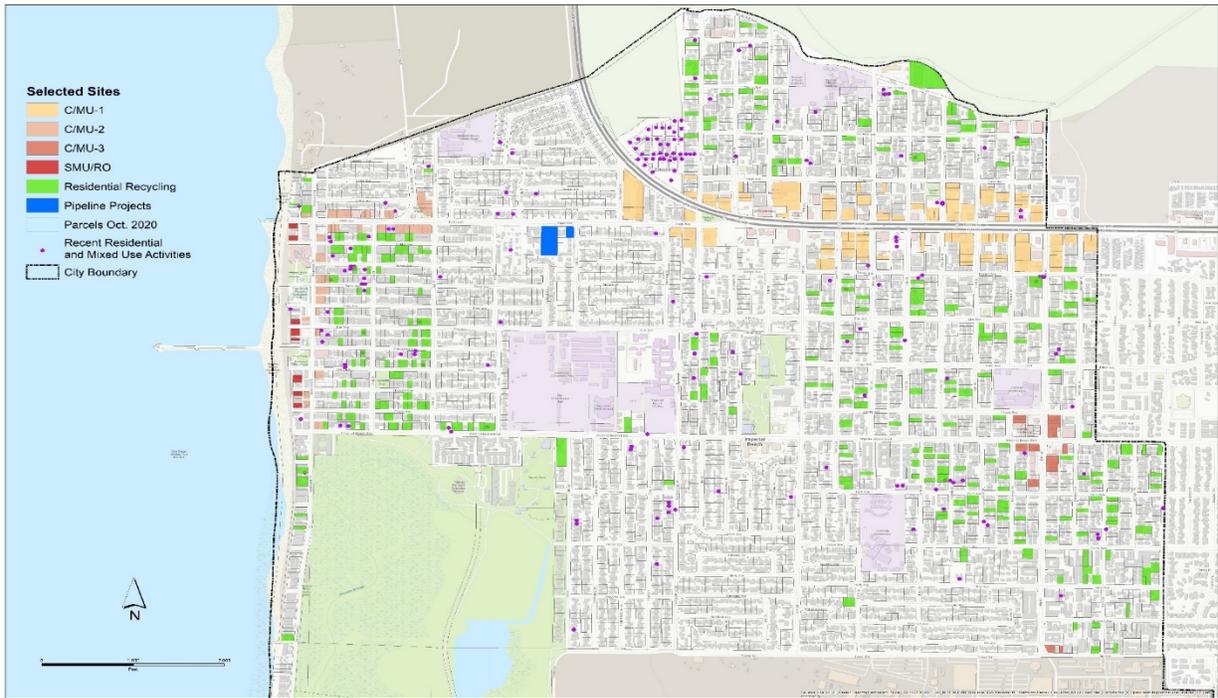
- Imperial Beach Blvd. Enhancement Project from Seacoast Drive to 15th St.
- Right of way improvements on 13th St. – reclassified road from 4 lanes to 3 lanes and added art crosswalks
- Revitalization of 13th St
- Improvements at Bikeway village – right of way improvements including to the bike lanes and a new viewing deck
- Improvements to pedestrian access ramps on Georgia St., 15th St, and 13th, Grove Ave & Iris Ave. between 5th St and Connecticut St.
- Improvements to bicycle and pedestrian and transportation infrastructure on 9th 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 13th 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