
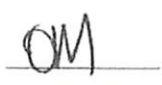



Agenda Item No. _____

DATE SUBMITTED 1/26/2022
 SUBMITTED BY COMMUNITY DEVELOPMENT DIRECTOR
 DATE ACTION REQUIRED 2/2/2022

COUNCIL ACTION (X)
 PUBLIC HEARING REQUIRED (X)
 RESOLUTION (X)
 ORDINANCE 1ST READING ()
 ORDINANCE 2ND READING ()
 CITY CLERK'S INITIALS ()

**IMPERIAL CITY COUNCIL/PLANNING COMMISSION SPECIAL MEETING
 AGENDA ITEM**

SUBJECT: DISCUSSION/ACTION: SIXTH HOUSING ELEMENT CYCLE 2021-2029 1. Approval of Resolution PC No 2022-01 recommending City Council to Adopt the Sixth Housing Element Cycle 2021-2029 2. Approval of Resolution No 2022-16 Adopting the Sixth Housing Element Cycle 2021-2029	
DEPARTMENT INVOLVED: COMMUNITY DEVELOPMENT	
BACKGROUND/SUMMARY: The Housing Element of the General Plan is designed to provide the city with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states the intent of creating housing elements: <i>The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.</i> This Housing Element is for the sixth housing element cycle, which covers an eight-year planning period from October 15, 2021 – October 15, 2029, which differs from the City’s other General Plan elements that cover a much longer period. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy.	
FISCAL IMPACT:	ADMIN SERVICES SIGN INITIALS <u></u>
STAFF RECOMMENDATION: Staff recommends that the Planning Commission approves Resolution PC2022-01 recommending City Council to adopt the Housing Element cycle 2021-2029 and The City Council adopts Resolution No 2022-16 adopting the sixth Housing Element cycle 2021-2029	DEPT. INITIALS <u></u>
MANAGER'S RECOMMENDATION:	CITY MANAGER'S INITIALS <u></u>
MOTION: SECONDED: APPROVED () REJECTED () AYES: DISAPPROVED () DEFERRED () NAYES: ABSENT: REFERRED TO:	

RESOLUTION NO. 2022-16

**A RESOLUTION OF THE IMPERIAL CITY COUNCIL
ADOPTING THE SIXTH HOUSING ELEMENT CYCLE 2021-2029**

WHEREAS, State law requires cities and counties to prepare and adopt a General Plan to guide the future development of a city or county which must contain certain elements, including a Housing Element which must be periodically updated and sets forth goals, policies, and programs to encourage the development of housing for all income groups and persons with special needs; and

WHEREAS, The City of Imperial has initiated a comprehensive update of the Imperial Housing Element and extended opportunities for citizens to participate in the development of the document; and

WHEREAS, The City has submitted its draft Housing Element document to the State Department of Housing and Community Development (HCD) and has made changes and updates in response to HCD's questions and comments; and

WHEREAS, a duly noticed public hearing was held by the Planning Commission and City Council on February 2, 2022 to further provide citizens an opportunity to comment on the Draft Housing Element, for the purpose of informing all interested parties of the proposed changes and revisions; and

WHEREAS, the City further conducted an environmental study on the proposed Housing Element update per the requirements of the California Environmental Quality Act and said study concluded that the proposal would have no significant environmental effect on the environment; and

WHEREAS, upon hearing and considering all testimony and arguments, analyzing the information submitted by staff, and considering any written comment received, the Imperial City Council considered all facts relating to the 2019 Draft update of the 2014-2021 Housing Element; and

NOW THEREFORE LET IT BE RESOLVED, that the Imperial City Council determines as follows:

- A) That the foregoing recitations are true and correct; and
- B) That based on the evidence presented at the public hearing, the City Council hereby **ADOPTS** the sixth Housing Element cycle 2021-2029, hereby incorporated as Attachment A, which includes changes in response to the State Department of Housing and Community Development (HCD)'s review of the document with state law, and authorizes the City Manager, or his designee to make minor, non-substantive revisions to the Housing Element as required by HCD after adoption; and
- C) The project's environmental impacts under the California Environmental Quality Act (California Public Resources Code §§ 21000, et seq., "CEQA") and the regulations promulgated thereunder (14 California Code

of Regulations §§ 15000, et seq., the “CEQA Guidelines”). The proposed Housing Element will not have the effect of substantially changing regulatory standards or findings required therefore in accordance with CEQA, the proposed ordinance is exempt from CEQA pursuant to Section 15061(b) (3) because the activity is governed by the common-sense rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Any changes to the City municipal code as required by the proposed Housing Element will be reviewed for environmental impacts at such time as the ordinance is brought forward for the City's consideration”.

- D) The proposed element updates are consistent with the objectives of the Imperial General Plan.

The City Attorney is authorized to make minor typographical changes to this Resolution that does not change the substance of this Resolution.

PASSED, ADOPTED AND APPROVED by the City Council of the City of Imperial, this 2nd day of February 2022.

Geoff Dale, Mayor

ATTEST:

City Clerk

2021 - 2029

**HOUSING
ELEMENT**

**December
2021**

**CITY OF IMPERIAL
Community
Development
Department
400 South Imperial
Avenue, Suite 101
Imperial, California
92251**



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Preface

"The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of highest order."

-California Government Code Section 65580

City of Imperial Mission Statement

To promote and provide for the safety, health and welfare of our citizens and business community, it is the Mission of the City of Imperial through Its elected officials, appointed officials, employees and volunteers to:

- *Provide customer service in a professional, cost-effective and innovative manner, consistent with the values of integrity, teamwork, stewardship, competence, politeness and respect.*
- *Provide land use planning direction that preserves City heritage and quality of life while promoting community improvement and economic development.*
- *Commit appropriate revenues to fund innovative, high quality, cost-efficient City programs and services while maintaining adequate reserves for unforeseen event or opportunities.*
- *Regularly evaluate City programs and services and revise them when appropriate.*
- *Seek the involvement of citizens in City government and planning, and foster civic leadership.*

1.0 Introduction

The Housing Element of the General Plan is designed to provide the city with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states the intent of creating housing elements:

The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

This Housing Element is for the sixth housing element cycle, which covers an eight-year planning period from October 15, 2021 – October 15, 2029, which differs from the City's other General Plan elements that cover a much longer period. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy.

Purpose of the Housing Element

According to California Government Code Section 65302, the General Plan is required to consist of seven State-mandated elements including land use, circulation, housing, conservation, open space, noise, and safety. The Housing Element is one of the seven State-mandated elements of the General Plan and must be updated every four, five, or eight years as mandated by California Government Code Section 65581. The purpose of the Housing Element is to craft a comprehensive strategy for providing safe, decent, and affordable housing within the community. The Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

This Housing Element represents the City of Imperial's sixth Housing Element cycle and will be carried out from 2021 through 2029.

Organization of the Housing Element

This Housing Element is organized into the following main chapters:

- Introduction: Provides a brief overview of the purpose and background for the Housing Element.
- Community Profile: Provides an assessment of the City's demographic and housing market characteristics and their correlation to housing needs in the community.

- **Constraints to the Provision of Housing:** Analyzes the various market, governmental, and environmental constraints in the City and their impact on the development and preservation of housing in Imperial.
- **Housing Opportunities and Resources:** Provides an inventory of land, financial, and administrative resources available to facilitate housing development in Imperial. Opportunities for energy conservation are also discussed.
- **Housing Plan:** Outlines the City’s proposed actions and objectives over the next eight years in addressing the housing needs of the community and complying with State law.

Relationship to State Law

The California Legislature has identified the attainment of a decent home and suitable living environment for every resident as the state’s major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature has mandated that all cities and counties prepare a housing element as part of their comprehensive general plan. Government Code Section 65302(c) and 65580-et seq. sets forth the specific components to be contained in a community’s housing element.

Planning Period

State law requires housing elements to be updated every eight years to reflect a community’s changing housing needs, unless otherwise extended by state legislation. This Housing Element is being updated as part of the sixth cycle of updates. For the City of Imperial, the planning period runs from October 15, 2021, through October 15, 2029.

Changes in State Housing Law Since Previous Update

The following items represent substantive changes to State housing law since the city’s last Housing Element was adopted and certified in 2019.

Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017), Assembly Bill 168 (2020) and Assembly Bill 831 (2020)

SB 35 created a streamlined, ministerial review process for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project’s units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate- income housing or have failed to submit an annual progress report as required under state law; or (2) 50 percent of the project’s units in jurisdictions that have not approved housing projects sufficient to meet their RHNA

for below moderate-income housing. AB 168 added a requirement to provide a formal notice to each California Native American tribe that is affiliated with the area of the proposed project. The Housing Element must describe the city’s processing procedures related to SB 35.

Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)

These bills require additional analysis and justification of the sites included in the sites inventory of the city’s Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and place size restrictions on all sites.

Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)

AB 686 requires the city to administer its housing programs and activities in a manner to affirmatively further fair housing and not take any action that is inconsistent with this obligation. The Housing Element must include an assessment of fair housing practices, an examination of the relationship of available sites to areas of high opportunity, and actions to affirmatively further fair housing.

No-Net-Loss Zoning: Senate Bill 166 (2017)

SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the city must either (1) identify, and rezone, if necessary, an adequate substitute site or (2) demonstrate that the land inventory already contains an adequate substitute site.

Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)

SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the housing element.

By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)

AB 2162 requires the city to change its zoning to provide a “by right” process and expedited review for supportive housing. The bill prohibits the city from applying a

conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater. The change in the law applies to sites in zones where multifamily and mixed uses are permitted, including in nonresidential zones permitting multifamily use. Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements.

Accessory Dwelling Units (ADU): Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly 587 (2019), Senate Bill 13 (2019), Assembly Bill 670 (2019), Assembly Bill 671 (2019), Assembly Bill 3182 (2020)

In recent years, multiple bills have added requirements for local governments related to ADU ordinances. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and limits on parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size requirements and replacement parking space requirements and require local jurisdictions to permit junior ADUs. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, prohibits fees on units of less than 750 square feet, and permits ADUs at existing multi-family developments. AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. AB 3182 prohibits homeowner’s associations from imposing rental restrictions on ADUs.

Density Bonus: Assembly Bill 1763 (2019) and Assembly Bill 2345 (2020)

AB 1763 amended California’s density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus from the otherwise maximum allowable density on the site. If the project is within half a mile of a major transit stop, the city may not apply any density limit to the project, and it can also receive a height increase of up to three additional stories (or 33 feet). In addition to the density bonus, qualifying projects will receive up to four regulatory concessions. Additionally, the city may not impose minimum parking requirements on projects with 100 percent affordable housing units that are dedicated to special needs or supportive housing. AB 2345 created additional density bonus incentives for affordable housing units provided in a housing development project. It also requires that the annual report include information regarding density bonuses that were granted.

Housing Crisis Act of 2019: Senate Bill 330 (2019)

SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prohibits localities from imposing a moratorium or similar restriction or limitation on housing development; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The Housing Element must describe the city's processing procedures related to SB 330.

Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)

AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the city to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the city or county that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the city to create a central inventory of surplus and excess public land each year. The city is required to transmit the inventory to the Department of Housing and Community Development and to provide it to the public upon request.

Housing Impact Fee Data: Assembly Bill 1483 (2019)

AB 1483 requires the city to publicly share information about zoning ordinances, development standards, fees, exactions, and affordability requirements. The city is also required to update such information within 30 days of changes. This Housing Element describes governmental constraints on the production of housing, including a look at zoning requirements, development standards, fees, exactions, and affordability requirements. Changes in requirements made during the Housing Element planning period will also be reported as part of the city's annual Housing Element Progress Report.

Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)

AB 139 established new criteria for evaluating the needs of the homeless population. The analysis must assess the capacity to accommodate the most recent homeless point-in-time count by comparing that to the number of shelter beds available on a year-round and

seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. The bill also established new parking standards for emergency shelters. Lastly, the bill requires the Housing Element to include a review of the effectiveness of the housing element goals, policies, and related actions to meeting the jurisdiction’s special housing needs.

Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)

SB 6 requires the city to electronically submit the sites inventory to HCD starting in 2021. This Housing Element will report on compliance with this requirement.

Evacuation Routes: Senate Bill 99 and Assembly Bill 747 (2019)

Two recent bills, AB 747 and SB 99, require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The bill requires these updates to occur with this Housing Element.

Regional Housing Needs Assessment (RHNA)

A critical measure of compliance with state housing element law is the ability of a jurisdiction to accommodate its share of the region’s housing needs. This is accomplished by providing plans, policies, and programs designed to meet the city’s RHNA.

Compliance with this requirement is measured by the jurisdiction’s ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Southern California Association of Governments (SCAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region.

For the 2021-2029 Housing Element update for the City of Imperial, SCAG has assigned a RHNA of 1,601 units, in the following income distribution:

- Very Low Income: 704
- Low Income: 346
- Moderate Income: 294
- Above Moderate Income: 257

Table 1: Projected Future Regional Housing Needs Allocation 2021

Income Category	Imperial	
	No. of Households	% of Total RHNA Allocation
Very Low	704	43.9%
Low	346	21.6%
Moderate	294	18.3%
Above Moderate	257	16.0%
TOTAL	1,601	100%

Source: SCAG 6TH CYCLE FINAL RHNA ALLOCATION PLAN 2021

Relationship with other General Plan Elements

The Housing Element is only one of seven mandatory General Plan Elements required by state law. The Housing Element builds upon the other General Plan Elements and must be entirely consistent with the policies and proposals set forth by these comprehensive elements. The City of Imperial General Plan is comprised of the following ten (10) elements: Land Use, Circulation, Housing, Public Facilities (optional element), Open Space, Conservation, Parks and Recreation (optional element), Noise, Airport (optional element) and Safety.

The City of Imperial reviewed and evaluated other General Plan goals, policies, and programs that could affect implementation of the Housing Element or that could be affected by the implementation of the Housing Element and found no inconsistencies. The 1992 (adopted in 1993) General Plan review demonstrated consistency with all other policies and programs. The City will maintain this consistency in the future by ensuring general plan amendments are evaluated for consistency with this Housing Element and all other General Plan Elements.

Several of the sites identified in this Housing Element for residential development currently have general plan designation and zoning in place that would facilitate residential development in the area, and the Housing Element does not propose any changes to land use and zoning in the area. In other cases, up-zoning and amendments to the zoning code would take place to accommodate all the unmet housing needs identified. Therefore, the adoption of the 2021-2029 Housing Element is not re-designating land or amending zoning that would directly result in the construction of any housing units or accelerate the rate of development on existing sites that could presently accommodate such development.

Public Participation

Housing issues affect the entire community, it is critical that the entire community be encouraged to participate in the Housing Element process. The public participation requirement of the Housing Element Law provides for opportunities to engage citizens in a dialogue with one another and with local leaders. It enables constituents to identify problems and create solutions.

Outreach for the sixth Cycle Housing Element was challenging because much of the update process occurred during the COVID-19 pandemic and the numerous surges in cases that occurred throughout the preparation process. Restrictions on public gatherings prevented the city from holding traditional public workshops. Instead, the city utilized online engagement tools, including a community survey, social media updates, live streamed meetings and online documents to provide opportunities for the community to share their feedback.

City Website and Social Media

During the development and review of the 2021-2029 Housing Element, the city created and maintained a section of the city's website dedicated to the housing plan update. This section provided easy access to information on the project, including the Housing Element. The city maintains social media accounts on Facebook, Twitter, Instagram, and YouTube. Notifications of pending meetings, workshops, survey participation, and video presentations were posted to all appropriate platforms. Additionally, when the city hall and planning department offices were reopened to the public, hard copy informational materials were made available with guidance on how to review the posted draft Housing Element and make comments to the City.

Public Workshops and Meetings

The city presented the first public workshop on the status of the Housing Element preparation and process on June 16, 2021, in an online and in-person format. This workshop was held in conjunction with a City Council meeting. In the public notices for the workshop, as well as at the meeting, citizens were encouraged to participate in the housing element/general plan update survey. Staff also solicited public opinion and recommendations regarding local housing needs from citizens present. Additional status updates were provided to Planning Commission and City Council hearings throughout the preparation period.

To solicit input from supportive services and housing providers, the city sent special notices for the public meeting to housing developers and professionals, as well as agencies that serve or represent the interests of lower and moderate-income households and persons with special housing needs. The City also advertised the availability of the Housing

Element update for public review in English and Spanish in the Imperial Valley Press and Desert Review. Special notices for the public meetings and document review were sent to the following housing industry /community stakeholders:

Table 2: Organizations Contacted Directly

Organization	Contact
Building Industry Association of Southern California	Mike Balsamo
COLAB-Coalition of Labor, Ag, and Business	Kay Pricola
Desert Valley Builders Association	James Brownyard
Imperial Valley Cycle Center	Martin D. Coyne
Pacific West Developmet	Daniel Dobron
Imperial Powersports	Kathy Marquand
G4 Construction	Mark Gaddis
TWG General Contractors	Tim W. Gaddis
Victoria Homes	Jim Lessley
Victoria Homes	Michael Pursglove
Duggins Construction	Jim Duggins
Victoria Homes	Tory Lessley
Riverside-Building Industry Association	Clint Lorimore
Riverside-Building Industry Association	Bill Blankenship
Duggins Construction	Russell Roben
Imperial Chamber of Commerce	Susan Paradis
G4 Construction	Sulma Gutierrez

Organization	Contact
Castillo Construction	Max Castillo
Duggins Construction	Oscar Grijalva
Barle Wells Public Finance Advisors	Erik Helgeson
Shine Real Estate Property Management	Ray Roben

It should be noted that during the public hearings, although comments from public officials were noted, no members of the public spoke or provided written comments. Public official comments were administrative or procedural in nature and therefore not noted as having consequence to analysis. Additionally, the City did not receive any comments from the stakeholders or members of the public in the form of email, phone call, or response from social media outlets throughout the entire process.

Prior to adoption of the Housing Element, the city will conduct public hearings before the Planning Commission and City Council. The City Council has the ultimate authority over the adoption of the Housing Element. Notices for these hearings will be published in the Imperial Valley Press and posted on City website.

Public Survey

The City crafted a survey and published it for the public to access on and asked questions regarding the public’s current living situation and what the public would like the city to concentrate more on, in regards to housing. A total of 40 community members responded to the survey. The survey results demonstrate that key issues concerning the public are housing affordability, availability of rental housing, issues with crime and safety, and pedestrian access (bike lanes, trails, etc.). Also, noteworthy was responses related to knowledge about fair housing violations which revealed approximately one-third of respondents aware of how to report fair housing violations and the other two-thirds were either not familiar or unsure. This indicates an opportunity for public outreach related to fair housing policies. The results were reviewed and taken into consideration when drafting the Housing Plan policies and programs, specifically in regard to community outreach. The results are presented in Appendix A of this report.

Draft Housing Element Review

Public information regarding the availability of the public survey and the review of the first draft of the Housing Element was posted to the City’s website on May 20, 2021. Additionally, in an effort to solicit input from the public, supportive service, and housing

providers, the City also sent special notices of the availability of the draft Housing Element to housing developers and professionals. The City also advertised the availability of the Housing Element for public review in English and Spanish in the Imperial Valley Press and Desert Review.

The second draft incorporating revisions based on initial comments from HCD staff was then made available for public review on August 6, 2021. The City did not receive any public comments or comments from contacted stakeholders since the original posting and notices were sent out.

The third draft was made available for public review on January 5, 2022, and the City accepted comments for consideration up until the final adoption of the document. Planning Commission and City Council held a joint public hearing on February 2, 2022, to deliberate on the 2021-2029 Housing Element. This joint public hearing was advertised in the Holtville Tribune-Imperial Valley Weekly and the Calexico Chronicle. The public hearing agenda and staff report were made available through the City Community Development Department website prior to the hearing as well.

Primary Data Sources

A variety of data sources are utilized to provide the data needed to complete the 2021-2029 Housing Element. The timeframes for the different data sources are not always the same. To help provide comparisons between various data sources, 2018 was selected as the primary year to represent current conditions for most of the data sets this survey produce, as data from this year was available through SCAG and the American Community Survey.

For future projections, the year 2035 is typically used. While further out than the planning period for the Housing Element, this year matches the buildout year used in the current Imperial General Plan and is used here for consistency.

2010 Census. The Census is considered the most accurate data source due to the large sampling conducted. Unfortunately, the Census was last updated in 2010, with data from the 2020 Census not available at the time this Housing Element was developed. Because of this, 2010 Census data is typically used for historic context.

American Community Survey (ACS). Prepared by the U.S. Census Bureau, the ACS is an ongoing monthly survey sent to about 3.5 million households that provides updates to key information on a yearly basis. In addition to updates on Census information, the ACS also covers topics not on the 2010 and 2020 Census, such as education, employment, internet access, and transportation.

California Department of Finance. The State provides up-to-date numbers on population and housing. For housing, the State estimates total and occupied housing units, household

size, household population, and group quarters population. ACS data are used to distribute 2010 census housing units into standard housing types (single detached units, single attached units, two to four units, five plus or apartment units, and mobile homes). Housing units are estimated by adding new construction and annexations and subtracting demolitions and adjusting for units lost or gained by conversions.

Comprehensive Housing Affordability Strategy (CHAS). Each year, HUD receives custom tabulations of ACS data from the U.S. Census Bureau. These data, known as the "CHAS" data, demonstrate the extent of housing problems and housing needs, particularly for low-income households. On August 25, 2020, HUD released updated CHAS data for the 2013-2017 period, which is used in this Element.

Southern California Association of Governments (SCAG). SCAG produces growth forecasts of population, housing, employment, income, and land use for jurisdictions for six counties—Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura and 191 cities. Local housing data for Imperial developed by SCAG and pre-certified by the California Department of Housing and Community Development (HCD) for use in 6th cycle housing elements is used in this Element.

2.0 Community Profile

The purpose of this section is to summarize and analyze the existing housing conditions in the City of Imperial. This section contains an analysis of population trends, employment trends, household trends and special needs groups within the City to effectively target its programs and resources towards those households with the greatest need.

Population Characteristics

The existing and future housing needs of a community are largely determined by examining forecasted growth of the number of households within a community. This growth potential is primarily established through population projections for the community. The projected population growth is then considered alongside other community demographics, such as age and ethnicity to determine the adequacy of available housing and the ideal level of vacancy needed to promote housing choice and affordability amongst the different types of households in the community.

Population Trends

Historical growth trends are one of the Factors used to project the population growth in a community. Based on population data available from the US Census Bureau and the State Department of Finance, the City of Imperial has experienced aggressive population growth over the last couple of decades when accounting for growth trends starting in 1990. From

2000 to 2020, the City had the highest growth in Imperial County, growing at an average annual growth rate of 4.8%. The table below describes the population trend in Imperial and its neighboring cities from 2000 to 2020.

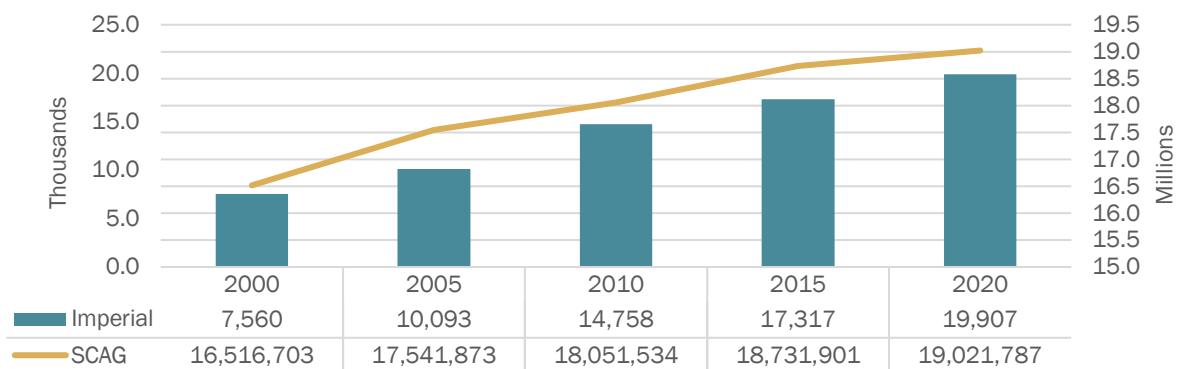
Table 3: Population Trends- Imperial and Neighboring Cities 2000-2020:

	2000	2005	2010	2015	2020	Percent Annual Growth Rate
Brawley	22,052	22,381	24,953	26,357	27,349	1.1%
Calexico	27,109	35,056	38,572	40,620	40,896	2.1%
El Centro	38,025	39,147	42,598	44,862	45,567	0.9%
Holtville	5,612	5,336	5,939	6,215	6,359	0.6%
Imperial	7,560	10,093	14,758	17,317	19,907	4.8%
Westmorland	2,131	2,319	2,225	2,327	2,346	0.5%

Source: CA DOF E-5 Population and Housing Unit Estimates

As shown in Figure 1 below, Imperial has a 2020 total population of 19,907 including 31 living in group quarters according to the California Department of Finance. The chart above describes the population trend in Imperial from 2000 to 2020. Over this period Imperial had an annual growth rate of 4.8% compared to 0.7% for the region.

Figure 1: Population Trend, 2000-2020 – Imperial and SCAG Region



Source: CA DOF E-5 Population and Housing Unit Estimates

Population Projections

The City of Imperial has a current population estimated at 20,289 per the CA DOF E-5 Population Estimate. The City of Imperial is comparatively one of the smaller cities, by population, within Imperial County. El Centro and Calexico are currently the largest cities in Imperial County by population with an estimated 44,997 and 40,485 residents, respectively. Imperial County has a total population of approximately 186,034 residents.

Available sources for population projection include the Southern California Association of Governments (SCAG) and the California State Department of Finance. As a part of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG published a Regional Growth Forecast. The report includes socioeconomic estimates and growth projections including population, households, and employment for cities and transportation analysis zones in the SCAG region through enhanced forecasting methods and interactive public outreach. These estimates and projections provide the analytical foundations for SCAG's transportation planning and other programs. The regional and county growth forecasts reflect recent and past trends and expert-derived demographic and economic assumptions.

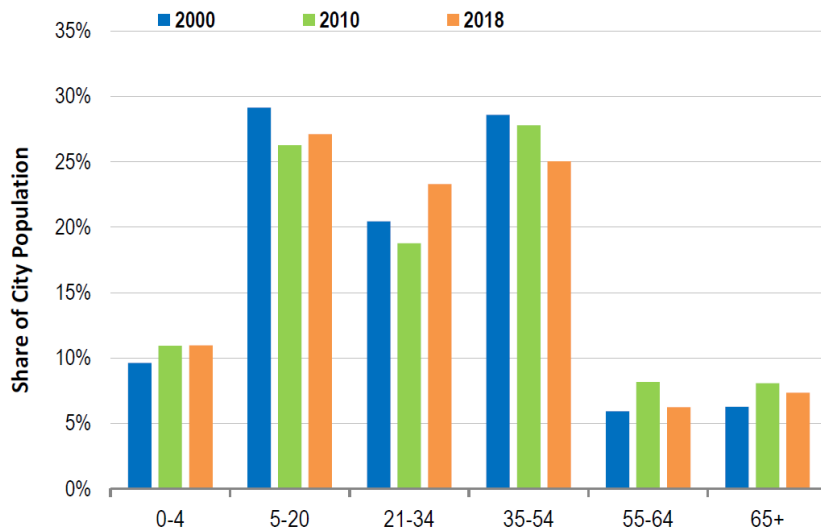
According to the Demographics and Growth Forecast prepared by SCAG, the City of Imperial is anticipated to experience modest growth over the next two decades. SCAG projects the City of Imperial to have a population of 27,800 residents by 2045.

Age Trends

The age structure of the population is an important factor in evaluating housing needs and projecting the direction of future housing development. Different age groups have distinct housing preferences, family types, household sizes, incomes, and lifestyle choices. For example, younger individuals living alone (between 20 and 34) and senior citizens over 65 typically need and/or desire apartments, condominiums, and smaller, more affordable housing units.

Understanding and evaluating the age characteristics of a community enables the City to address the distinct needs of the current population and citizens as they move through each stage of life. Between 2000 and 2018, the 21-34 age group experienced the largest increase in share, growing from 20.4 to 23.3 percent. The age group that experienced the greatest decline in share was 35-54, decreasing from 28.6 to 25 percent. The 21-34 age group added the most population, with an increase of 2,397 people between 2000 and 2018.

Figure 2: Population Share by Age: 2000, 2010, and 2018



Source: 2000 & 2010 U.S. Decennial Census; American Community Survey, 2017; Nielsen Co.

Race and Ethnicity

Race and ethnicity can potentially reflect cultural preferences regarding housing needs. For example, certain cultures may be accustomed to living with extended family members and need larger units. Therefore, planning for communities with high concentrations of certain racial/ethnic groups should consider the unique housing needs of these groups.

Between 2000 and 2018: the share of Hispanic population in the city increased from 61.1 percent to 76.9 percent, the share of Non-Hispanic White population in the city decreased from 32.4 percent to 15.3 percent, the share of Non-Hispanic Asian population in the city decreased from 2.3 percent to 2.1 percent, the share of Non-Hispanic Black population in the city increased from 2.4 percent to 3.0 percent, the share of Non-Hispanic American Indian or Alaska Native population in the city decreased from 0.5 percent to 0.3 percent, and the share of All Other Non-Hispanic population group in the city increased from 1.4 percent to 2.4 percent.

Economic Characteristics

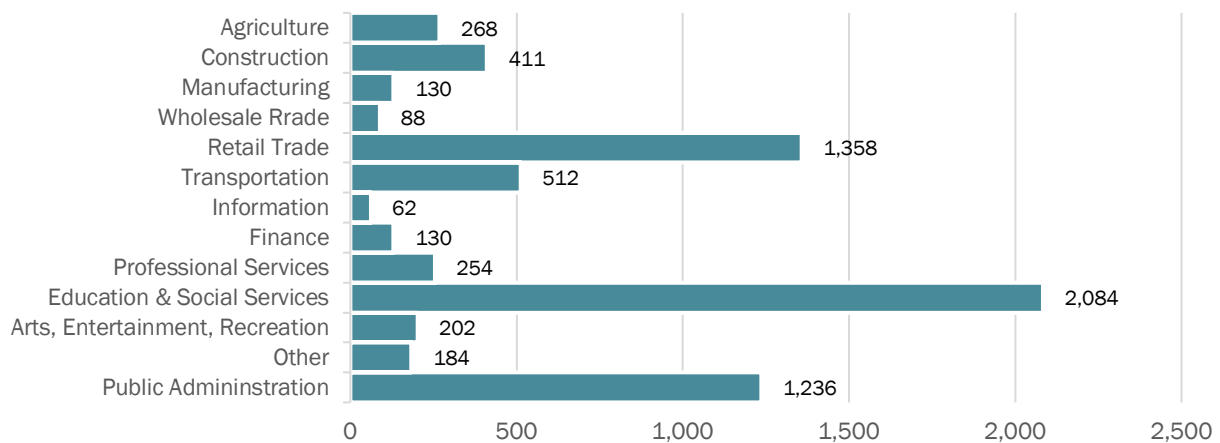
Employment has an important impact on housing needs. Incomes associated with different jobs and the number of workers in a household determines the type and size of housing a household can afford. Higher- paying jobs provide broader housing opportunities for residents, while lower-paying jobs limit housing options. Additionally, employment growth is a major factor affecting the demand for housing in a community. 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).

City of Imperial Labor Force

Imperial has 6,919 workers living within its borders who work across 13 major industrial sectors. The chart below provides detailed employment information. The most prevalent industry is Education & Social Services with 2,084 employees (30.1% of total) and the second most prevalent industry is Retail trade with 1,358 employees (19.6% of total).

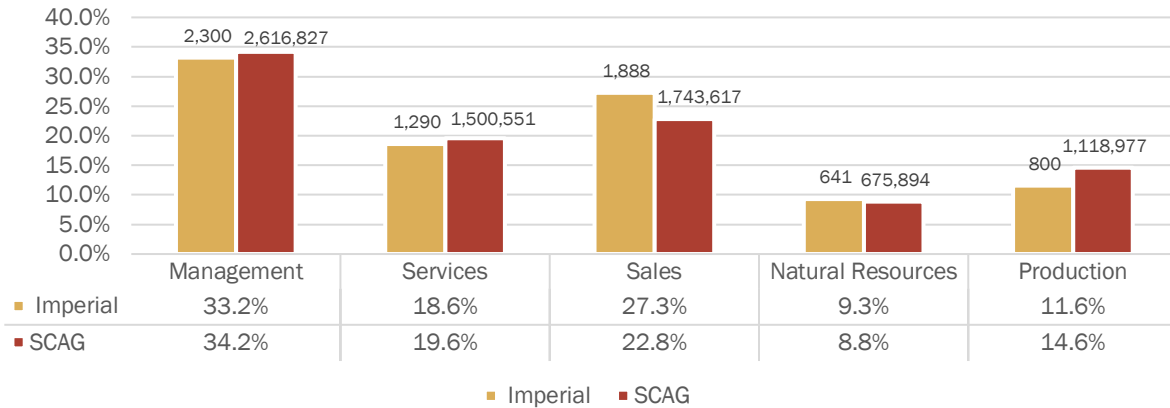
In addition to understanding the industries in which the residents of Imperial work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category in Imperial is Management, in which 2,300 (33.2% of total) employees work. The second-most prevalent type of work is in Sales, which employs 1,888 (27.3% of total) in Imperial.

Figure 3: Employment by Industry



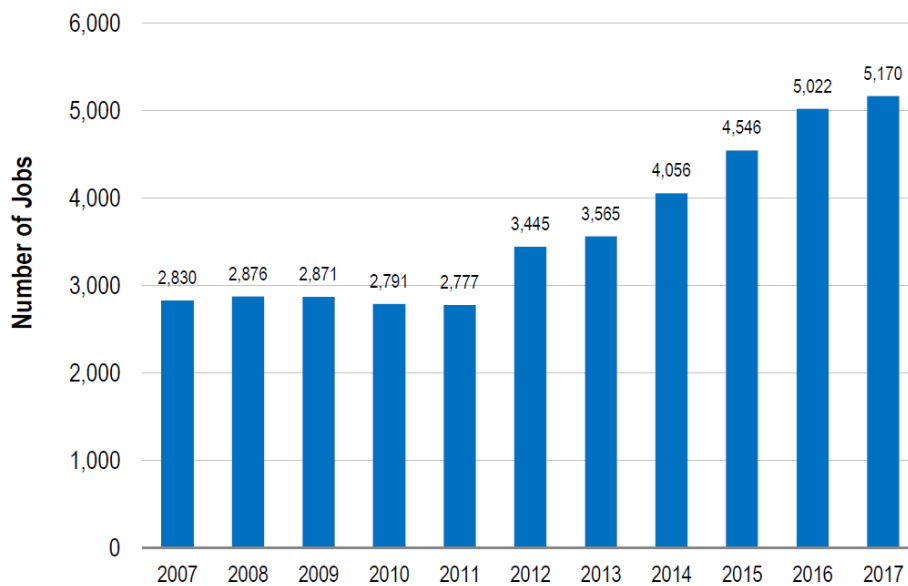
Source: American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

Figure 4: Employment by Occupation



Source: American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

Figure 5: Total Jobs: 2007 - 2017



Source: California Employment Development Department, 2007 - 2017; InfoGroup; & SCAG

Household Characteristics

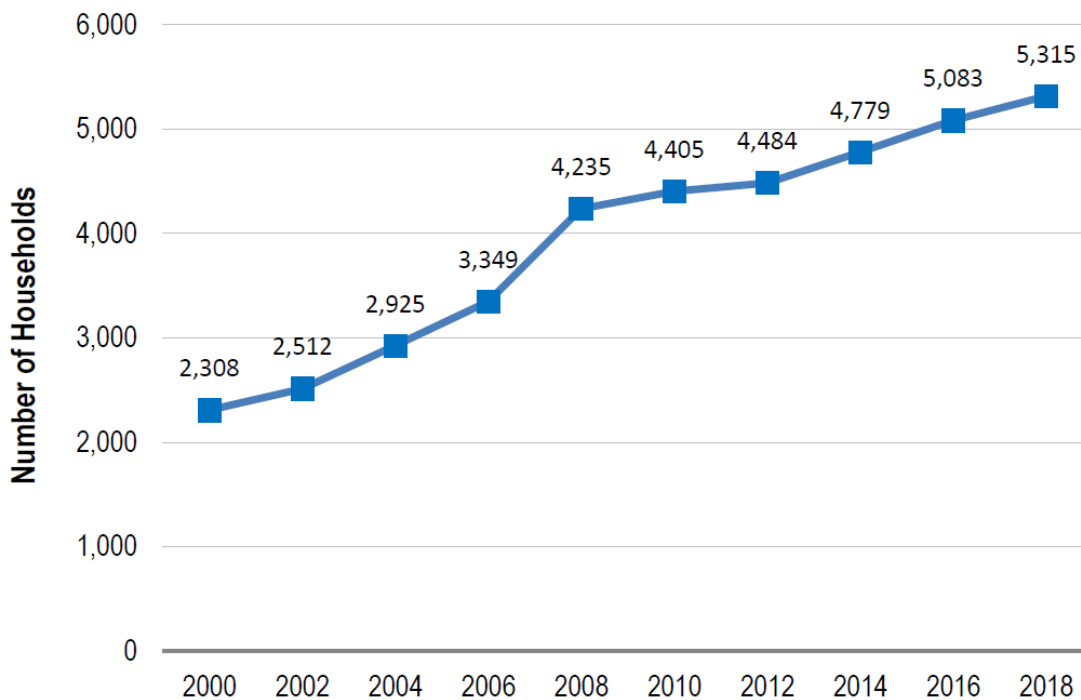
The Census defines a household as all persons who occupy a housing unit, which may include families related through marriage or blood, unrelated individuals living together, or individuals living alone. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households. Planning for the housing needs of the city can be accomplished by analyzing statistics that indicate household type, household size, household income, and incidence of overcrowding. Typically, a community with more families, larger households, and households with children need and/or desire

larger units and ownership opportunities. Communities that have a higher percentage of senior citizens typically need and/or desire smaller, accessible, and affordable units.

Existing Households & Composition

In 2018, there were 4,309 households in the City of Imperial according to the American Community Survey 2014-2018 5-year estimates. The total number of households in the City of Imperial increased by 3,007 units, or 130.3 percent between 2000 and 2018. During this 18-year period, the city’s household growth rate of 130.3 percent was higher than the county growth rate of 27.2 percent.

Figure 6: Number of Households 2000 - 2018



Source: California Department of Finance, E-5, 2000-2018

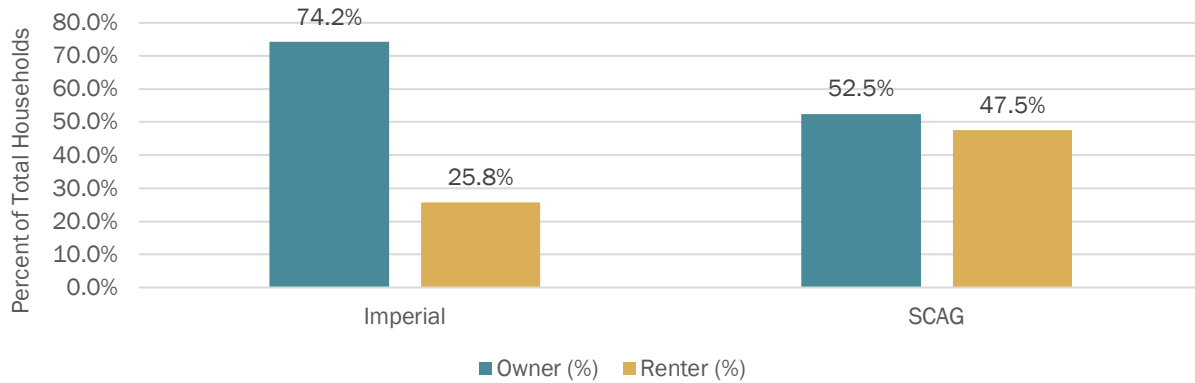
Household Tenure Characteristics

Tenure, for the purpose of this analysis refers to whether a housing unit is owned or rented. Housing tenure is an important indicator of the supply and cost of housing. Low ownership rates suggest an inadequate supply, or high cost, of housing while high ownership rates suggest affordability.

Housing security can depend heavily on housing tenure. Imperial's housing stock consists of 4,309 total units, 3,198 of which are owner-occupied and 1,111 of which are renter-occupied. The share of renters in Imperial is lower than in the SCAG region overall. In many

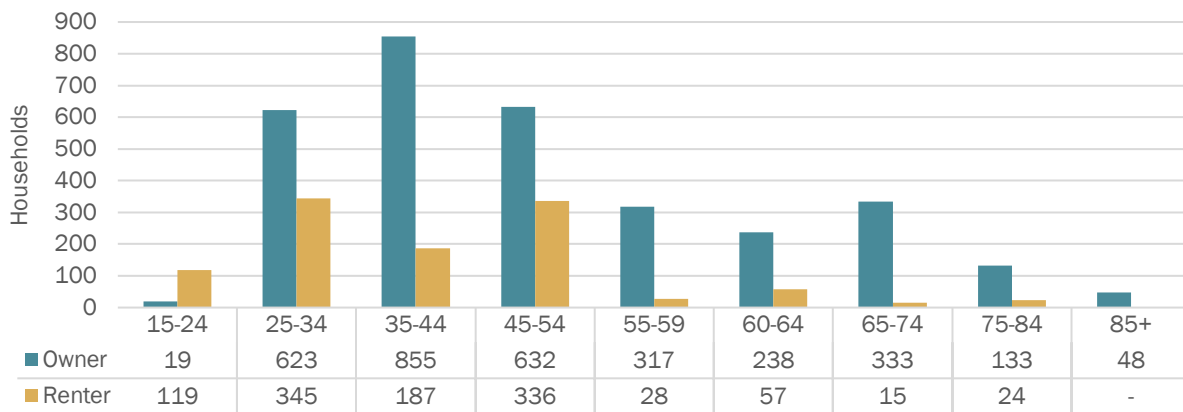
places, housing tenure varies substantially based on the age of the householder. In Imperial, the age group where renters outnumber owners the most is 15-24 (by 72.5%). The age group where owners outnumber renters the most is 85+ (by 100%).

Figure 7: Housing Tenure



Source: American Community Survey 2014-2018 5-year estimates.

Figure 8: Housing Tenure by Age



Source: American Community Survey 2014-2018 5-year estimates.

Housing Problems

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census Bureau for HUD provides detailed information on housing needs by income level for different types of households in Imperial. Detailed CHAS data based on the 2012-2016 ACS data is displayed in Table 3. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);

- Housing cost burden, including utilities, exceeding 30 percent of gross income; and
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

Table 4 also details the housing assistance needs for lower-income households that rent or own in Imperial. The types of problems vary according to household income, type, and tenure. Some notable details include:

- a. Low-income households tend to more often be renters more than buyers;
- b. Renter-households had a higher level of housing problems (35.1 percent) compared to owner- households (26.9 percent);
- c. Approximately 84 percent of extremely low-income (households earning less than 30 percent of the AMI), 76 percent of very low-income households (households earning between 31 and 50 percent of the AMI), and 63 percent of low-income (households earning between 51 and 80 percent of the AMI) had housing problems; and
- d. Nearly 86 percent of extremely low-income renter households spend more than 50 percent of their income on housing and 86 percent spend more than 30 percent of their income on housing.

Table 4: Housing Assistance Needs of Lower-Income Households (2014-2018)

Household by Type, Income, and Housing Problem	Renters	Owners	Total Households
Extremely low-income (0-30% AMI)	210	70	280
With any housing problem	85.7%	78.6%	83.9%
With cost burden >30%	85.7%	78.6%	83.9%
With cost burden > 50%	85.7%	64.3%	80.4%
Very low-income (31-50% AMI)	65	140	205
With any housing problem	100%	64.3%	75.6%
With cost burden >30%	100%	64.3%	75.6%
With cost burden > 50%	0%	57.1%	39.0%

Household by Type, Income, and Housing Problem	Renters	Owners	Total Households
Low-income (51-80% AMI)	120	250	370
With any housing problem	83.3%	54.0%	63.5%
With cost burden >30%	70.8%	54.0%	59.5%
With cost burden > 50%	12.5%	20.0%	17.6%
Moderate & Above Income (>80% AMI)	715	2,735	3,450
With any housing problem	7.0%	21.2%	18.3%
With cost burden >30%	0%	14.8%	11.7%
With cost burden > 50%	0%	2.2%	1.7%
Total Households	1,110	3,195	4,305
With any housing problem	390	860	1,250
% With housing problem	35.1%	26.9%	29.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.

NOTE: Data presented in this table are based on special tabulations from the American Community Survey (ACS) data. Due to the small sample size, the margins of errors can be significant. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Extremely Low-Income Households

Extremely low-income is defined as households with income less than 30 percent of area median income. The area median income in Imperial is \$85,163. For extremely low-income households, this results in an income of \$25,550 or less for a four-person household. Households with extremely low-income have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance are considered extremely low-income households.

In 2018, approximately 280 extremely low-income households resided in the City, representing 6.5% of the total households. Most (75 percent) extremely low-income households are renters and experience a high incidence of housing problems. For example,

85.7 percent of extremely low-income households faced housing problems (defined as cost burden greater than 30 percent of income and/or overcrowding and/or without complete kitchen or plumbing facilities) and 85.7 percent were in overpayment situations. Even further, 85.7 percent of extremely low-income households paid more than 50 percent of their income toward housing costs.

To calculate the projected housing needs, the City assumed 50 percent of its very low-income regional housing need are extremely low-income households. As a result, from the very low-income need of 704 units, the City has a projected need of 352 units for extremely low-income households. Many extremely low-income households will be seeking rental housing and most likely facing an overpayment, overcrowding or substandard housing condition. Some extremely low-income households could be with mental or other disabilities and special needs. To address the range of needs, the City will employ a detailed housing strategy including promoting a variety of housing types as described in Programs 3: Affordable Housing Development, Program 15: Supportive and Transitional Housing Program and Program 16: Alternative Housing, of the Housing Plan (Chapter 6).

Household Size and Incidence of Overcrowding

It is important to understand that the size of a household will change over time due to unpredictable circumstances such as marriage, divorce, growth of family, job movement, etc. Household size, nevertheless, is an important indicator of housing need.

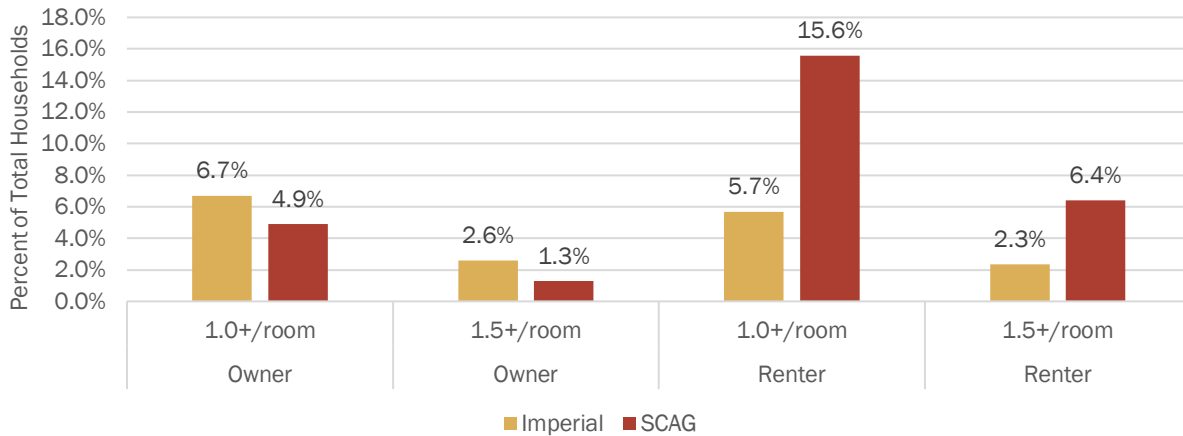
Larger households have special housing needs, as they tend to have higher incidences of overcrowding and may identify a need for larger units. "Overcrowded" is defined as over 1 persons occupying a room, excluding bathrooms, kitchens, hallways, and porches.

"Severely overcrowded" is defined as more than 1.5 persons occupying a room.

Overcrowding usually results from a lack of availability or affordability of appropriate housing units.

In Imperial, 214 owner-occupied and 63 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. 83 owner-occupied households and 26 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

Figure 9: Crowding by Extent and Tenure



Source: American Community Survey 2014-2018 5-year estimates.

Household Income

Household income is directly connected to the ability to afford housing. Higher incomes households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons 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 areas such as Imperial 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

Between 2013 and 2017, approximately 82 percent of Imperial households earned moderate or above moderate-incomes (Table 5), while just 18 percent of households had lower-incomes.

Table 5: Households by Income Category (2014-2018)

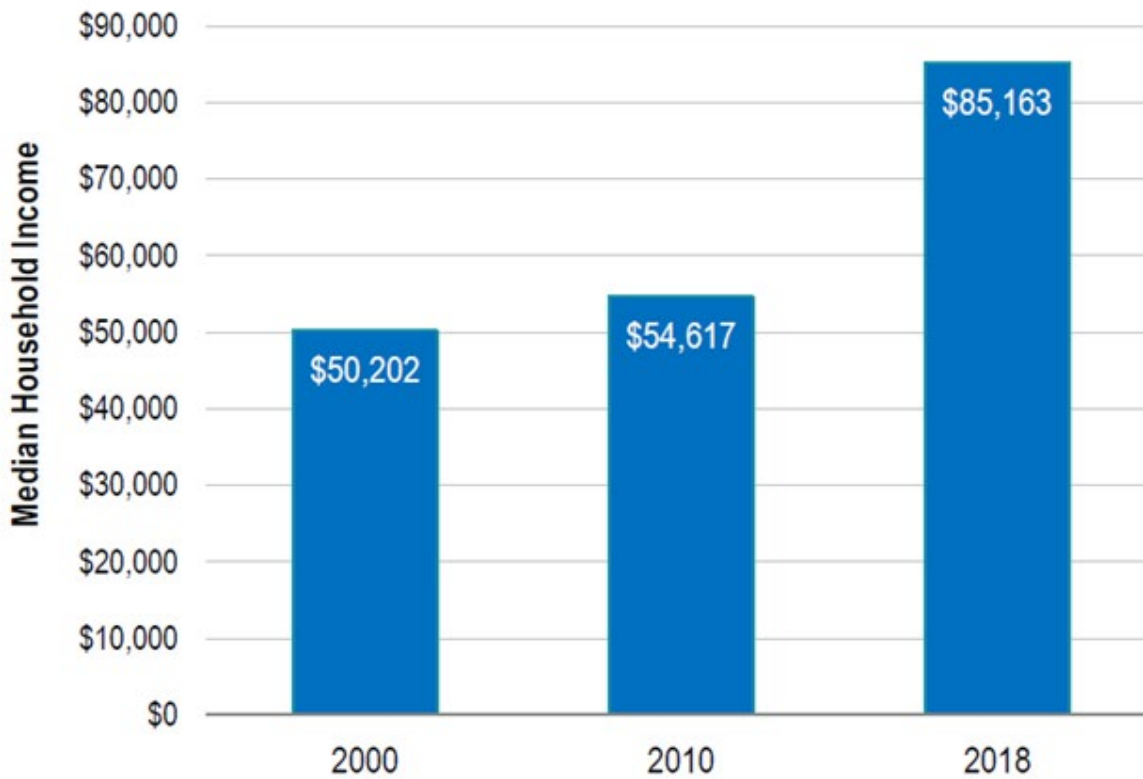
Income Category (% of County AMI)	Households	Percent
Extremely Low (30% HAMI or less)	280	6.5%
Very Low (31 to 50% HAMI)	205	4.8%
Low (51 to 80% HAMI)	370	8.6%
Moderate (80 to 100% HAMI)	165	3.8%
Above Moderate (100% and above HAMI)	3,285	76.3%
Total	4,305	100.0%

Source: Department of Housing and Urban Development (HUD); Comprehensive Housing Affordability Strategy (CHAS), 2014- 2018.

NOTE: HAMFI refers to Housing Urban Development Area Median Family Income

Households in the City of Imperial have a Household Median Income of \$85,163. From 2000 to 2018, median household income increased by \$34,961. In further analyzing the significant difference between the City of Imperial and the balance of the region, note that the recent construction activity of new homes has resulted in hundreds of new families coming to the area with substantial household income to support the new home purchase. Since 2010, there have been 12,135 homes purchased in the Imperial County. Of these, 2,798 (or 23%) of the total homes purchased were in the City of Imperial, while only 9% of the region's population lives within the city.

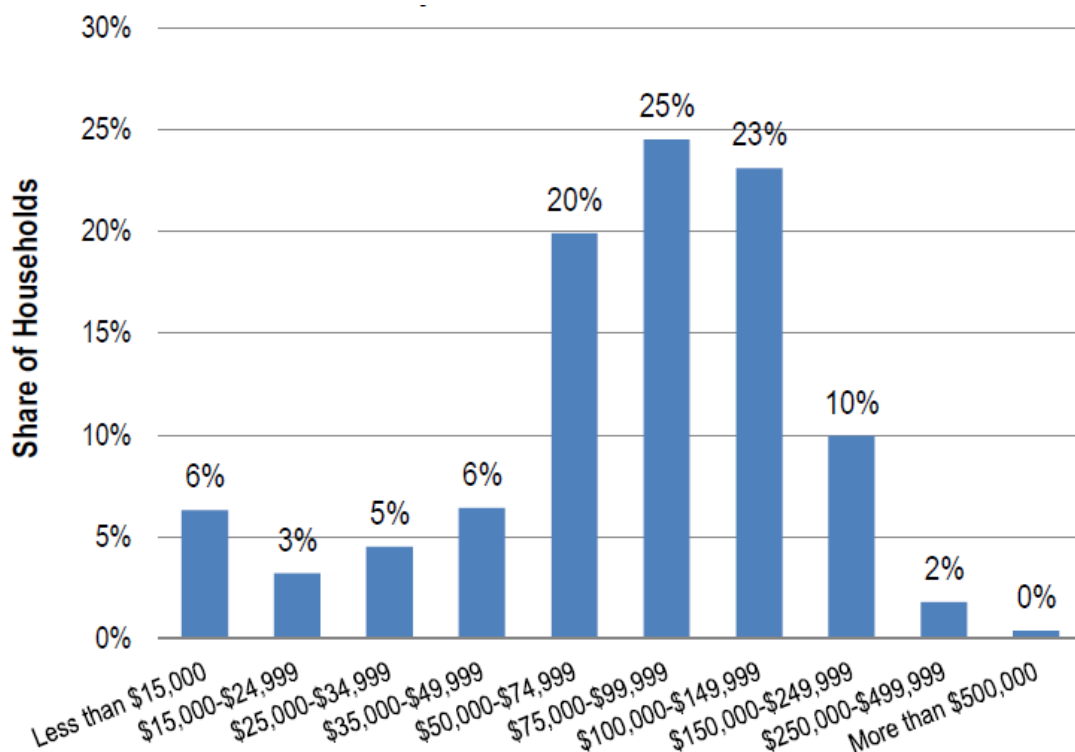
Figure 10: Median Household Income: 2000, 2010, and 2018



Source: 2000 & 2010 U.S. Decennial Census: American Community Survey, 2017; Nielson Co.

The figure below provides a breakdown of household incomes in the City of Imperial by household. Note that over 50% of households have an income of between \$50,000 and \$125,000 per year while only about 14% of families have a household income of under \$35,000 annually. In 2018, about 20 percent of Imperial households earned less than \$50,000 annually and approximately 35 percent of Imperial households earned \$100,000 or more.

Figure 11: Percent of Households by Household Income: 2018



Source: U.S. Census American Community Survey, 2017; Nielsen Co.

Vacancy Rates

A certain amount of vacancy allows for greater ease for households or individuals to find available housing and may lead to lower housing costs. The City of Imperial has a housing stock of a total of 6,196 housing units. Out of the total housing units in Imperial, there are 5,557 occupied units, which equates to a 10.3% total vacancy rate in the City. Vacancy rates are an important housing market indicator in that the vacancy rate often influences the cost of housing and reflects the correlation between housing demand and availability.

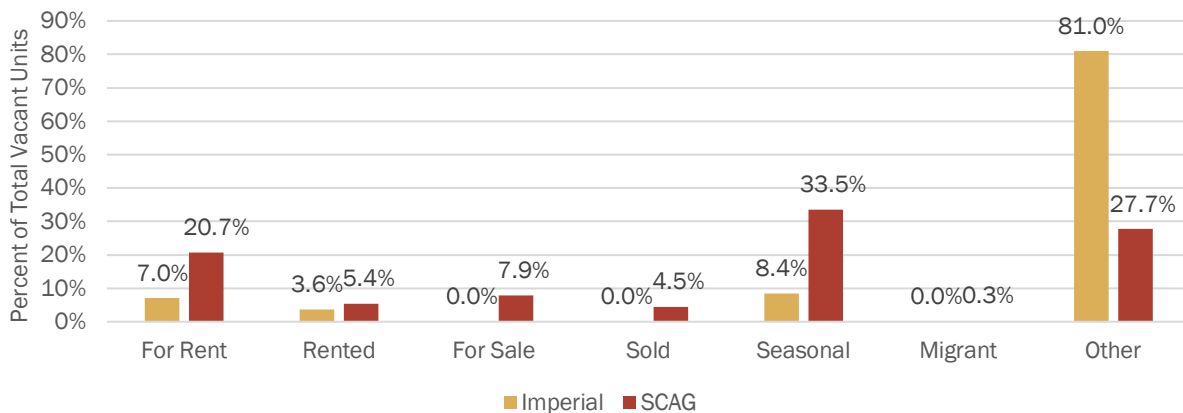
For rental housing, a five percent vacancy rate is considered necessary to permit ordinary rental mobility, while with for-sale housing a two-percent vacancy rate is considered the threshold to permit ordinary mobility. If vacancy rates are below these levels, residents will have a difficult time finding appropriate units and competition for units will drive up housing prices. The Table and Figure below show unit availability in the City of Imperial for each housing type.

Table 6: Vacant Units by Type

	Imperial	
For Rent	84	7.0%
Rented	43	3.6%
For Sale	0	0.0%
Sold	0	0.0%
Seasonal	100	8.4%
Migrant	0	0.0%
Other	966	81.0%

Source: American Community Survey 2014-2018 5-year estimates.

Figure 12: Vacant Units by Type



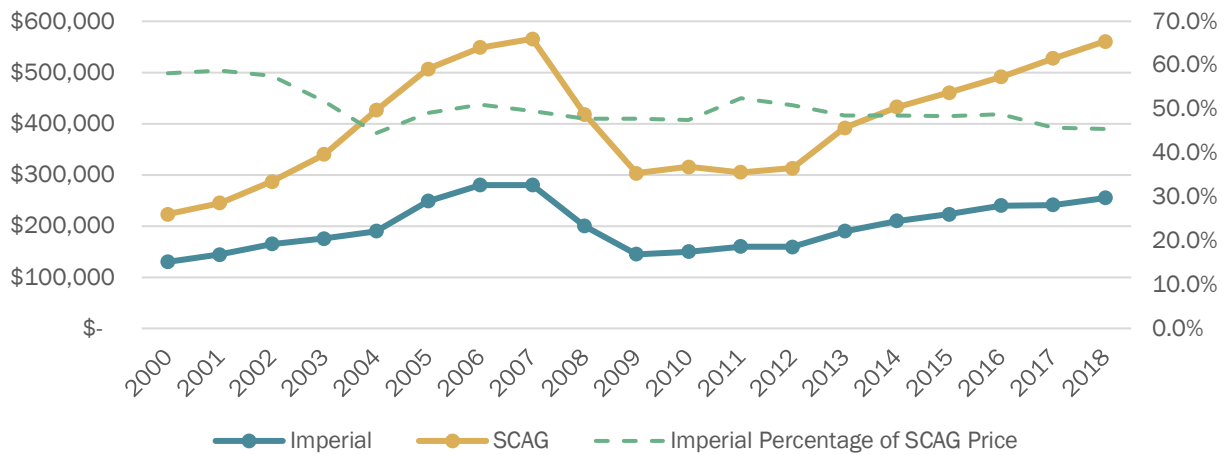
Source: American Community Survey 2014-2018 5-year estimates.

As shown in Table 6, approximately 81 percent is shown as “other”, which is significantly disproportionate to the rest of the region (28 percent). Given the large discrepancies in the data related to the region, it can be assumed that there are potential issues with the data collection or presentation. Therefore, as a part of Program 1: Residential Sites Inventory, of the Housing Plan (Chapter 6) additional research will be conducted to clarify details of the vacancy data and actions will be formulated to resolve any vacancy issues.

Housing Affordability & Household Overpayment

Between 2000 and 2018, median home sales prices in Imperial increased 96% while prices in the SCAG region increased 151%. 2018 median home sales prices in Imperial were \$255,000 and the highest experienced since 2000 was \$280,000 in 2006. Prices in Imperial have ranged from a low of 44.5% of the SCAG region median in 2004 and a high of 58.8% in 2001. The City of Imperial has the highest value homes in Imperial County with a median home value of \$255,000. The percentage of owner-occupied homes across a region indicates the level of "roots" and can be indicative of pride in a specific community which further encapsulates the economic stability of a city.

Figure 13: Median Home Sales Price for Existing Homes



Source: SCAG Local Profiles, Core Logic/Data Quick.

NOTE: SCAG median home sales price calculated as household-weighted average of county medians.

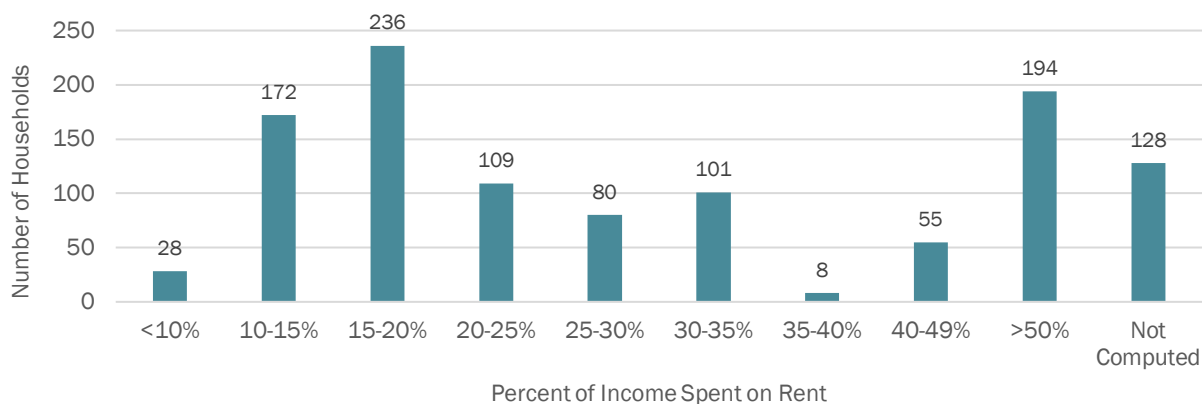
Housing cost burden is typically measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for 'severe cost burden.' However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience truer 'cost burden.' These data indicate the number of households in Imperial by their income relative to the surrounding area and their share of income spent on housing.

Table 7: Cost Burden by Income

Housing Average Median Family Income (HAMFI)	Share of Income Spent on Housing Cost:		
	< 30%	30-50%	> 50%
< 30% HAMFI	15	15	125
30-50% HAMFI	60	134	94
50-80% HAMFI	209	110	0
80-100% HAMFI	95	85	30
> 100% HAMFI	3,050	300	20
Total Households	3,429	644	269

Source: HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income. Across Imperial's 1,111 renter households, 358 (32.2%) spend thirty percent or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 194 renter households in Imperial (17.5%) spend fifty percent or more of gross income on housing cost, compared to 28.9% in the SCAG region.

Figure 14: Spending on Rent



Source: American Community Survey 2014-2018 5-year estimates.

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 74.2% of Imperial and 52.5% of the SCAG region. The most

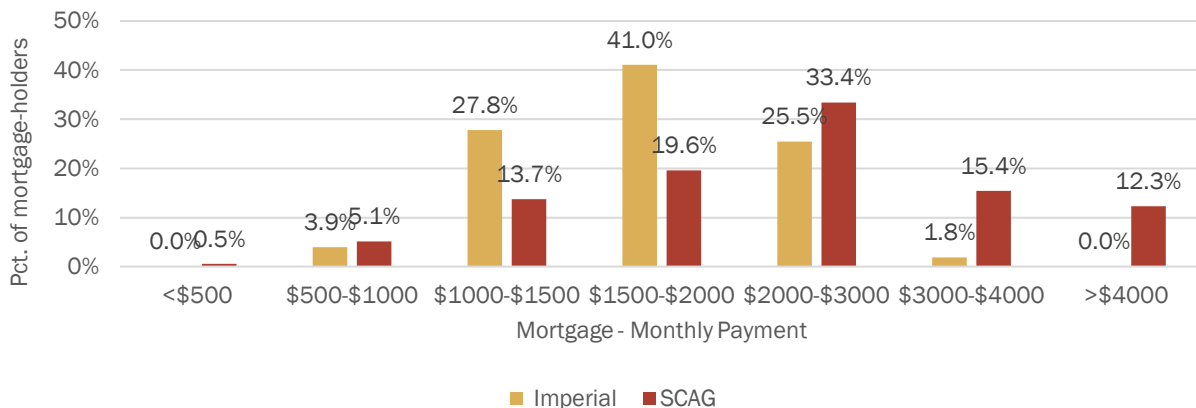
commonly occurring mortgage payment in Imperial is \$1500-\$2000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/mo.

Overpayment largely affects owner occupied housing units and households with above moderate income, suggesting that these households likely have choices. The above table identifies that the renter households that overpay are low income which suggests very limited options for this group of households.

Mortgage-holding households in Imperial can be broken down by income and the percentage of income spent on mortgage costs. As one might expect, the general trend is that lower-income households spend a higher share of income on housing costs, while high-income households may spend a lower share of income on housing. The income category most prevalent amongst Imperial mortgage-holding households is \$75,000 or more (1,842 households) and the most prevalent share of income spent on mortgage costs is 20-29% (1,024 households).

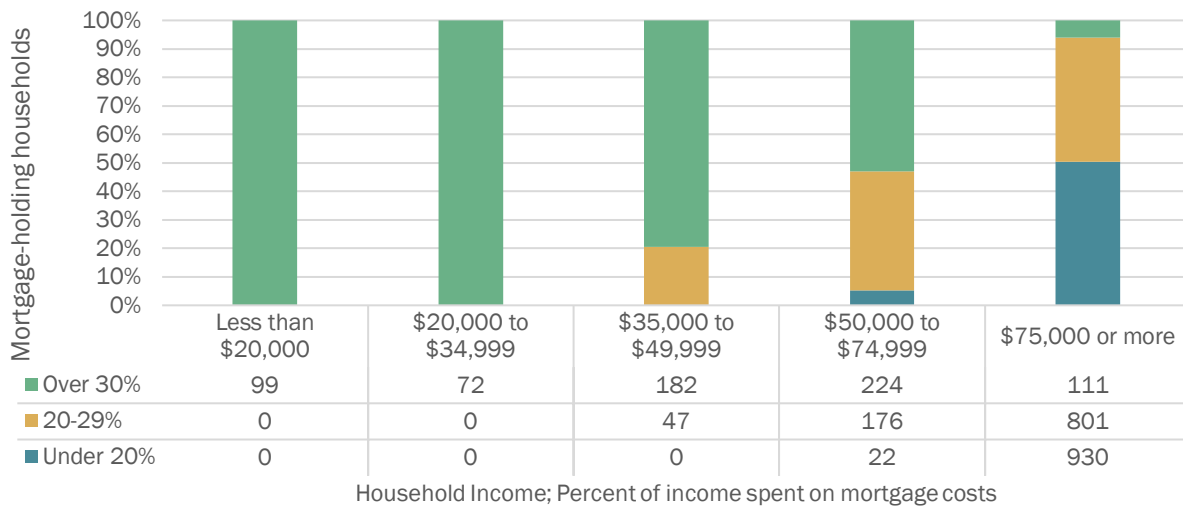
Another approach to evaluating the relationship between housing and income is to compare incomes and home values in Imperial. The most commonly occurring income category amongst owner households in Imperial is \$100,000 or more (1,080 households) and the most commonly occurring home value category is \$200,000 to \$500,000 (2,016 households).

Figure 15: Monthly Owner Costs for Mortgage Holders



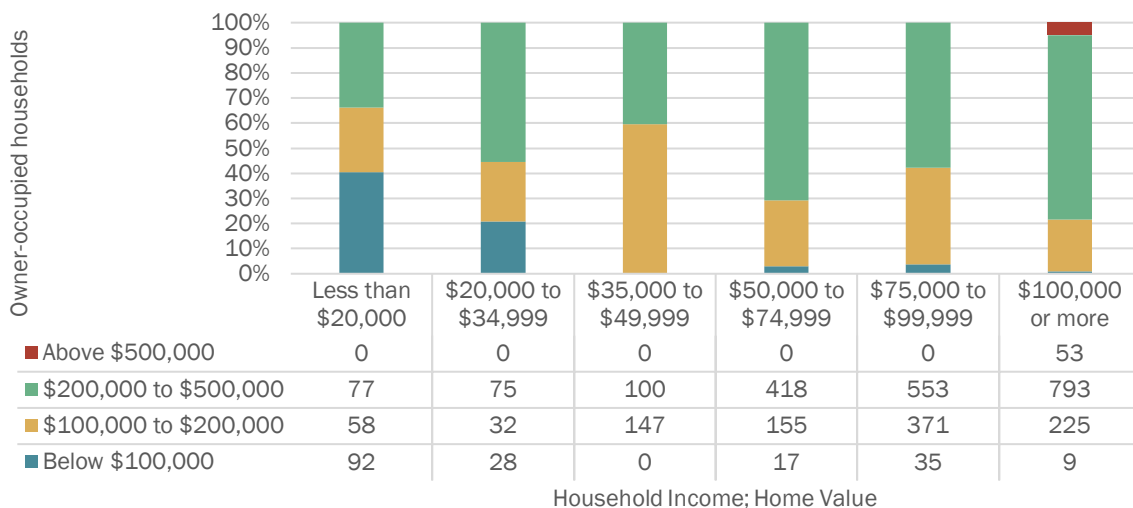
Source: American Community Survey 2014-2018 5-year estimates.

Figure 16: Costs for Mortgage Holders by Income



Source: American Community Survey 2014-2018 5-year estimates.

Figure 17: Household Income by Home Value (for owned units)



Source: American Community Survey 2014-2018 5-year estimates.

Distinguishing between renter and owner housing overpayment is important because, while homeowners may overextend themselves financially to afford the option of home purchase, the owners always maintain the option of selling their home. Upper income households are also generally capable of paying a larger proportion of their income for housing; therefore, estimates of housing overpayment generally focus on lower income groups. Renters, on the other hand, are limited to the rental market and are generally required to pay the rent established by the market.

Lack of housing affordability leads to other housing issues, for lower-income renters and owners, severe cost burden can require families to double up resulting in overcrowding and related problems. Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can also lead to housing deterioration.

Assisted Housing at Risk of Conversion to Market Rate

Existing housing that receives governmental assistance or obtained a governmental subsidy for the construction of, is often a significant source of affordable housing in many communities. State housing element law requires cities to prepare an inventory of all assisted housing units that are available or at risk to convert to non-low-income housing due to termination of subsidy contract, mortgage prepayment, and/or expiring use restrictions. State law requires the following:

- An inventory of restricted low-income housing project and their potential for conversion;
- An analysis of the costs of preserving and/or replacing "at risk" units and a comparison of these costs;
- An analysis of the organizational and financial resources available for preserving and/or replacing the units at risk and;
- Programs for preserving "at risk" units.

At this time, Imperial has only three publicly assisted housing projects located in the City, two of which are senior housing apartment. Table 8 identifies each of the assisted developments and the earliest date of conversion. As noted in the table, one assisted rental property, the Imperial Villa Apartments, is considered "at risk" of conversion sometime in the year 2029, with two additional properties, Imperial Garden Apartments and Villa Lara Apartments, considered not "at risk" until after the end of this planning period; however, the City plans to monitor all subsidized units to continue their affordability to lower income households.

Table 8: Inventory of Assisted Rental Housing

Project Name	Assisted Units	Funding Sources	Earliest Date of Conversion	At Risk Status
Imperial Villa Apartments (Senior)	39	USDA R.H.S (SECTION 515)	2029	YES; Restriction Expiration
Imperial Garden Apartments (Senior)	76	LIHTCH (2% Allocation) AHP/HOME	2037	NO
Villa Lara Apartments	79	LIHTC (2% Allocation)	2032	NO
TOTAL UNITS	194			

Source: USDA Rural Housing Services (R.H.S) formerly FmHA

State Housing Element law requires the analysis of government-subsidized housing that may change from low-income housing to market-rate housing during the next ten years. Thus, this at-risk housing analysis covers the period from October 15, 2021, through October 15, 2031. This section evaluates affordable housing in Imperial that may be at-risk of converting to market rates and the estimated costs to preserve or replace the at-risk units.

Within the 2021-2031 “at-risk” housing analysis period, one of the City’s affordable housing projects is considered at moderate risk with a restriction clause expiration year of 2029. It is possible approximately 40 of the City’s affordable housing units could convert to market-rate during the planning period.

Preservation Options

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; and 2) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units. The following discussion highlights ways that the City’s at-risk project could be preserved as affordable housing. All the presented alternatives are costly and beyond the ability of the City of Imperial to manage without large amounts of subsidy from Federal and/or state resources. These options are described below.

Transfer of Ownership

One preservation option is to transfer the ownership of the at-risk units to a nonprofit organization or purchase similar units by a nonprofit organization. This option is applicable to the Imperial Villas Apartments, as it is a for-profit housing project. By transferring property ownership to a non-profit organization, low-income restrictions can be secured, and the project would become potentially eligible for a greater range of governmental assistance. The cost of transferring ownership depends on several factors, including the market conditions at the time, occupancy rate, and physical conditions of the building and units. The estimated market value for the for-profit units at risk is provided in Table 9.

Table 9: Market Value of At-Risk Housing Units

Unit Information	Total
One-Bedroom Units	36
Two-Bedroom Units	4
Annual Operating Cost	\$74,160.00
Gross Annual Income	\$403,200.00
Net Annual Income	\$329,040.00
Market Value	\$4,113,000

Market value for at-risk units is estimated with the following assumptions:

- Average market rent based on Fair Market Rents (FY 2022) established by HUD (One-bedroom unit = \$815, and Two-bedroom unit = \$1,065).
- Average sizes for the Imperial Villa Apartments are 400 square feet for a one-bedroom apartment, and 520 square feet for a two-bedroom apartment.
- Annual operating expense in \$4.50 per square foot. $[(400 \times 36) + (520 \times 4)] = 16,480 \times \$4.50 = \$74,160$
- Gross Annual Income is calculated from cost of unit times number of units and includes a vacancy rate of 5%. $[(\$815 \times 36) + (\$1065 \times 4)] = \$33,600 \times 12 \text{ months} = \$403,200$
- Market value = Annual net project income times multiplication factor of 12.5 for a building in good condition.

Current market value for the at-risk units is estimated based on the units’ potential annual income minus operating and maintenance expenses. As indicated, the estimated market

value of the Imperial Villa Apartments is \$4.1 million. This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of this project. The actual market value at time of sale would depend on market and property conditions, lease-out/turnover rates, among other factors.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. This option is applicable to any units subsidized with Federal or state funding. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low-income household. Table 10 estimates the rent subsidies required to preserve the affordability of the Imperial Villa Apartments at-risk units. Based on the estimates and assumptions shown in this table, approximately \$7,688 in rent subsidies would be required monthly (or \$92,256 annually). Assuming a 20-year affordability, the total subsidy is about \$1.85 million.

Table 10: Rental Subsidies Required

Unit Size	Total Units	Fair Market Rent ¹	Household Size	Very Low Income (50% AMI) ²	Affordable Cost – Utilities ³	Monthly Per Unit Subsidy	Total Monthly Subsidy
1-br	36	\$815	2	\$28,000	\$639	\$176	\$6,336
2-br	4	\$1,065	3	\$31,500	\$727	\$338	\$1,352
Total	40						\$7,688

Notes:

1. Final FY 2021 Fair Market Rent (FMR) is determined by HUD.
2. Imperial County 2021 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD).
3. Affordable cost = 30% of household income minus utility allowance (average \$61).

Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the subsidy amount received to market levels.

To purchase the affordability covenant on these projects, an incentive package should include interest subsidies at or below what the property owners can obtain in the open market. To enhance the attractiveness of the incentive package, the interest subsidies may need to be combined with rent subsidies that supplement the HUD fair market rent levels.

Replacement Option

Another alternative to preserve the overall number of affordable housing units in the county is to construct new units to replace other affordable housing stock that has been converted to market-rate housing. Multifamily replacement property would be constructed with the same number of units, with the same number of bedrooms and amenities as the one removed from the affordable housing stock.

The cost of new affordable housing can vary greatly depending on factors such as location, density, unit sizes, construction materials, type of construction (fair/good), and on- and off-site improvements. In March 2020, the Turner Center reported that new multifamily construction costs average approximately \$222 per square foot; therefore, the cost to replace the Imperial Villa Apartments would be \$88,800 per unit for the 400-square-foot (36 units), one-bedroom units and \$115,440 per unit for the 520-square-foot two-bedroom units (4 units), for a total construction cost of \$3,658,560. According to Loopnet.com, 21.85 acres of residential land in the City of Imperial would cost \$7,614,288, or \$348,480 per acre. Conservatively assuming five acres of land would be required to replace a 40-unit multifamily development in the City of Imperial, it would cost \$1,742,400 to purchase land for a replacement project. The total cost to replace the Imperial Villa Apartments building is estimated to be \$5,400,960.

Cost Comparison

The cost to build new housing to replace the Imperial Villa Apartment at-risk units is high, with an estimated total cost of more than \$5.4 million. This cost estimate is substantially higher than the cost associated with transfer of ownership (\$4.1 million) and providing rent subsidies, like Housing Choice Vouchers, for 20 years (\$1.85 million).

Resources for Preservation of At-Risk Units

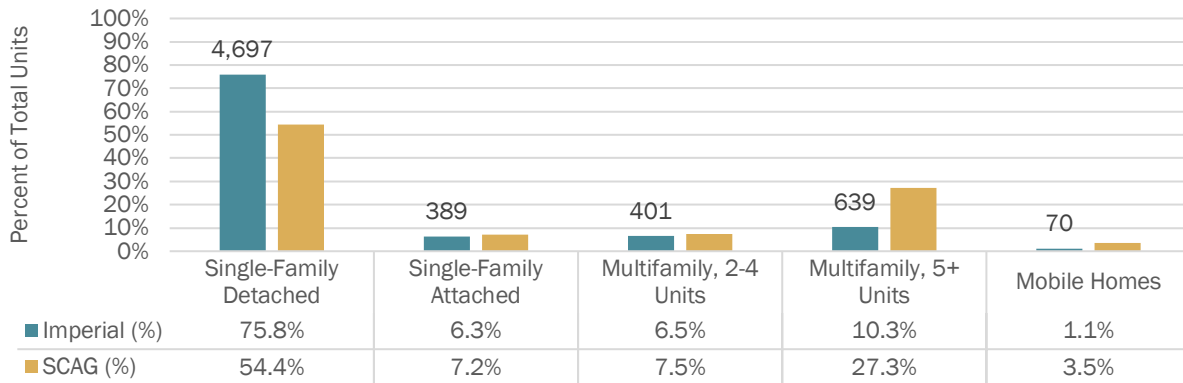
A variety of potential funding sources are available for the acquisition, replacement, or rent subsidies; however, due to the high costs of developing and preserving at-risk housing relative to the amount of available local funds, multi-layering of local and non-local sources may be required. A more thorough description of resources for the preservation of at-risk units is presented in Section 4, Housing Resources. Through Program 17, the City will continue to monitor the at-risk units located in Imperial Villa Apartments and should a notice of intent to convert to market rate be filed, work with potential purchasers to

preserve the units, and ensure that tenants were properly notified of their rights under California law.

Housing Stock

The most prevalent housing type in Imperial is single-family detached with 4,697 units. The Figure below provides detailed information on the housing stock in Imperial, which has a total of 6,196 housing units. The share of all single-family units in Imperial is 82.1%, which is higher than the 61.7% share in the SCAG region. Out of the total housing units in Imperial, there are 5,557 occupied units, which equates to a 10.3% total vacancy rate. The average household size (as expressed by the population to housing unit ratio) is 3.577.

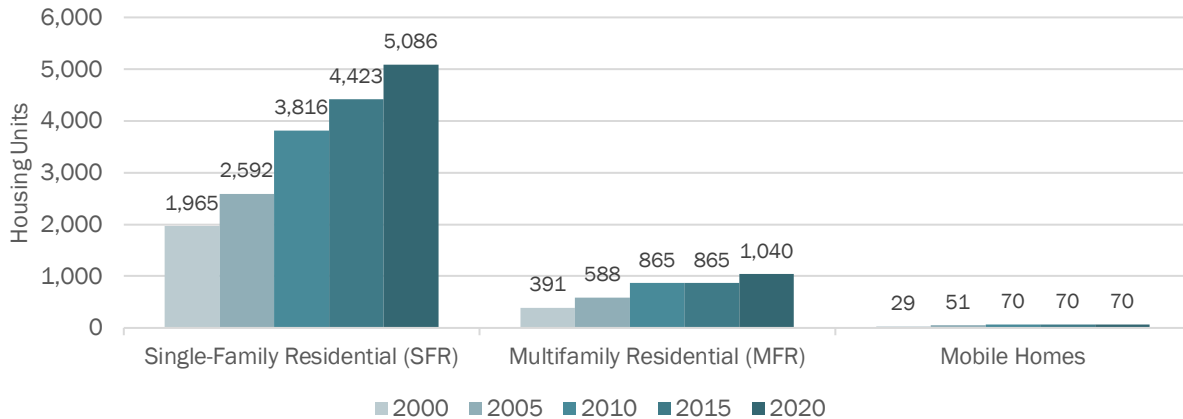
Figure 18: Housing Type



Source: CA DOF E-5 Population and Housing Unit Estimates

Over the past two decades (2000-2020), there has been more construction of single-family residential units than multi-family residential units in Imperial. When comparing 2000 to 2020, SFR units increased by 3,121, MFR units increased by 649, and mobile units increased by 41.

Figure 19: Housing Type Trends



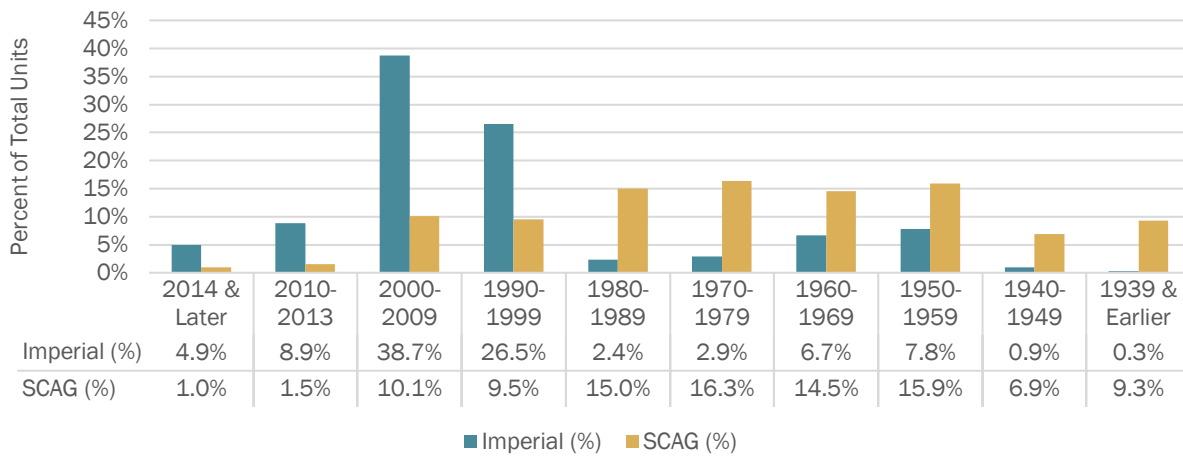
Source: CA DOF E-5 Population and Housing Unit Estimates

Conditions of Housing Stock

Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. 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 a 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.

Examining the age of the current housing stock is one way to understand how historical development patterns have contributed to a city's form. The time period where the highest share of Imperial's housing units was built was 2000-2009, while in the SCAG region more units were built during 1970-1979 than any other period.

Figure 20: Housing Units by Year Structure Built



Source: American Community Survey 2014-2018 5-year estimates.

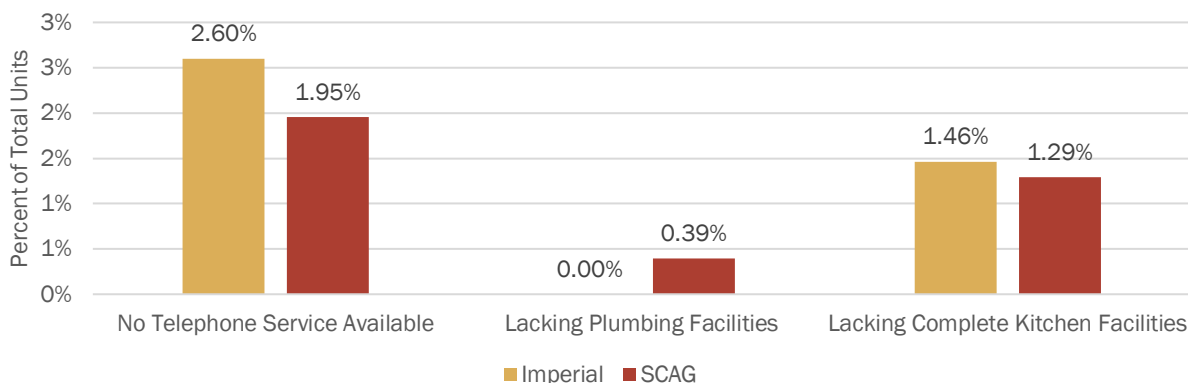
There are other factors besides age that may result in deterioration, such as the unavailability of financial resources by unit owners for adequate upkeep and maintenance. Based on age alone, the City of Imperial has a new housing stock with over 50% of the City's housing stock being less than 20 years old. However, a survey of housing conditions has not been conducted by the City in twelve years and therefore is not reasonable to estimate the number of units in need of rehabilitation or replacement. The City will be conducting a new housing survey as a part of the Program 1 in the Housing Plan.

Substandard Housing

Housing Element Law requires an estimate of substandard housing in the community. A housing unit can be categorized as needing Minor, Moderate or Substantial repair as may be determined through a visual survey. Dilapidated units cannot be rehabilitated and should be removed or reconstructed.

The ACS includes surveys about three factors of what may be considered substandard housing. In Imperial, 112 units lack telephone service, 0 units lack plumbing facilities, and 63 units lack complete kitchen facilities.

Figure 21: Substandard Housing



Source: American Community Survey 2014-2018 5-year estimates.

The City of Imperial has had an active Housing Rehabilitation Program which would prevent further deterioration from aging units. Again, a Housing Condition Survey is best determined by the percentage of units built prior to 1980 which provides an estimate of major rehabilitation or replacement need.

Special Needs Households

The State Housing Element law requires that the needs of these groups be addressed in the Housing Element. The law defines "special needs" groups to include persons with disabilities, the elderly, large households, female-headed households with children, homeless persons, and farmworkers. This section provides a detailed discussion of the housing needs facing each group, as well as programs and services that may be available to address their special housing needs.

Farmworkers

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or season agricultural labor. Permanent farm laborers work in the fields, processing plants, or agricultural related support activities. When workload increases during harvest periods, the labor force is supplemented by seasonal labor, often supplied by a labor contractor. For some crops, farms may employ migrant workers, defined as those who travel long distances to work which prevents them from returning to their primary residence every evening and might necessitate temporary housing at their place of employment. Determining the true size of the agricultural labor force is problematic. This conclusion is based upon subsequent farm worker data that conflicts with prior data. Moreover, different employment estimation techniques result in diverse estimates of local agricultural employment. The USDA’s 2017 Census of Agriculture reported that in Imperial County, 7,934 persons were hired farmworkers (fulltime), with

4,634 working more than 150 days and 3,300 working less than 150 days. Imperial County’s migrant farmworker population was 1,057.

Farmworkers are typically categorized into three groups: 1) permanent, 2) seasonal, and 3) migrant. Permanent farmworkers are usually employed year-round by the same employer while a seasonal farmworker works on average less than 150 days per year. Migrant farmworkers are seasonal farmworkers who must travel to do the farm work and are unable to return to their permanent residence within the same day necessitating temporary housing services.

Table 11: Farmworkers by Occupation

Farming, fishing, and forestry occupations	SCAG Total	Imperial	Percent of Total workers
Total jobs	57,741	133	1.92%
Full-time, year-round jobs	31,521	27	0.57%

Source: American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

Table 12: Employment in the Agricultural Industry

Agriculture, forestry, fishing, and hunting	SCAG Total	Imperial	Percent of Total workers
Total jobs	73,778	245	3.54%
Full-time, year-round	44,979	117	2.48%

Source: American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions has farmworkers living in them, they are essential to the region's economy and food supply.

Farmworkers and laborers in Imperial County had an average annual wage of \$24,632 during 2018, according to the California Employment Development Department. Due to their identified low-income, most farmworkers would need housing subsidies or other forms of assistance to obtain adequately sized and affordable housing. The City of Imperial is actively involved in the provision of permanent housing suitable for farmworkers.

Resources

Because farmworkers make up a small percentage of the City’s population, no specific housing programs are necessary. The housing needs of farmworkers in Imperial can be

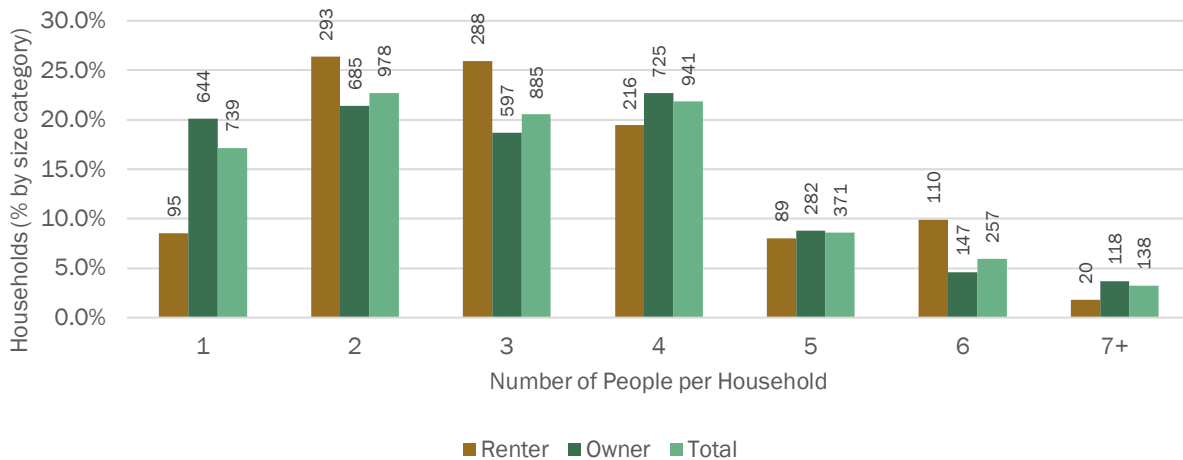
addressed through the city’s general affordable housing programs for lower-income households. Certain programs and services offered by agencies detailed in Chapter 6 can also be of assistance to the city’s farmworkers.

The city has been successful in developing partnerships with subsidized housing Developers; The Las Palmeras Apartment Project has been completed, which offers Farmworkers Housing. Las Palmeras is a 56-unit, multi-Family project located at 470 Wall Road within the incorporated City of Imperial. Although temporary housing has not been identified as a high need in the Imperial community, the City's Zoning Ordinance does not preclude the development of temporary housing.

Large Families

Large households are defined as those consisting of five or more members. An estimated 766 large households were identified in Imperial during the 2014-2018 American Community Survey. Of these large households, 547 were in owner-occupied units, while 219 were in renter-occupied units. 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 families to reside in smaller units, this results in overcrowding.

Figure 22: Households by Household Size



Source: American Community Survey 2014-2018 5-year estimates.

This chart illustrates the range of household sizes in Imperial for owners, renters, and overall. The most commonly occurring household size is of two people (22.7%) and the second-most commonly occurring household is of four people (21.8%). Imperial has a lower share of single-person households than the SCAG region overall (17.2% vs. 23.4%) and a higher share of 7+ person households than the SCAG region overall (3.2% vs. 3.1%).

Resources

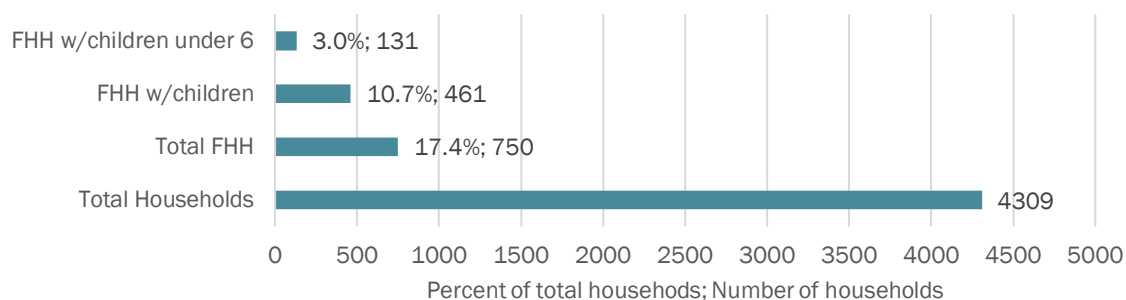
To address overcrowding, communities can provide incentives to facilitate the development of affordable housing with three or more bedrooms to meet the needs of large households. Lower and moderate-income large households can benefit from various affordable housing programs. These include the Homeownership Education classes, Mortgage Credit Certificate program, affordable housing development assisted with City, State, and federal funds, and Housing Choice Vouchers, among others.

Female Headed Households

Because of the relatively lower-incomes and typical living expenses of a traditional household, single-parent households are more likely to have difficulty finding affordable and safe-housing. These households often require special consideration and assistance, because of their greater need for affordability, accessibility to day care/childcare, health care, and other supportive services as well as a safety comfort. Female-headed families with children are a particularly vulnerable group because they must balance the needs of their children with work responsibilities, and often while earning limited incomes.

Statute requires analysis of specialized housing needs, including female-headed households to ensure adequate childcare or job training services. Of Imperial's 4,309 total households, 17.4% are female-headed (compared to 14.3% in the SCAG region), 10.7% are female-headed and with children (compared to 6.6% in the SCAG region), and 3% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

Figure 23: Female Headed Households (FHH)



Source: American Community Survey 2014-2018 5-year estimates.

Resources

Lower-income single-parent households can benefit from City programs that provide direct rental assistance or that will facilitate the development of affordable housing. Affordable housing opportunities can also be expanded for low- and moderate- income single-parent

households through the Housing Choice Vouchers, Homeownership Education classes, and the Mortgage Credit Certificate program.

Homelessness

The City of Imperial, with the assistance and participation of its local service providers, maintains a continuum of care for the homeless population and to those facing the possibility of homelessness. The continuum of care begins with the assessment of the homeless individual or family; then refers to appropriate housing where supportive services are provided to prepare them for independent living. The goal of a comprehensive homeless service system is to ensure that homeless individuals and families move from homelessness to self-sufficiency, permanent housing, and independent living.

Due to their transient nature, it is difficult to count the number of homeless in any one area. It should also be noted that there are generally two types of homeless - the permanent homeless, who are the transient and most visible homeless population, and the temporary homeless, who are homeless usually due to eviction and may stay with friends, family, at a shelter or motel until they can find a permanent residence.

The City of Imperial works with other county departments, mental health providers, homeless and transitional shelters, local jurisdictions, and other service providers to identify the needs of the homeless, which have been identified in the 2020 Homeless Point-in-Time Survey conducted on January 24-25, 2020. This updated count presents the most current data for the region. The Point-in-Time Survey reported that on a given day, there are 1,527 homeless in the County of Imperial. This includes 1,334 unsheltered and 193 sheltered homeless people. The exact population of those who are homeless within the City is difficult to estimate because of the transient nature of the homeless population. Proportionally, Imperial's population represents about 11 percent of the countywide population. Therefore, it can be generally estimated that 146 unsheltered homeless persons in Imperial. Given the basis of the calculation, the emergency need conditions and the transient nature of homeless people, these numbers will continue to fluctuate.

The Point-in-Time Survey also reported the following about the homeless in Imperial County:

- There are 92 homeless children under the age of 18, of which 38 are sheltered while 54 are unsheltered.
- The largest subpopulation of unsheltered homeless are male; there is a total of 1,085 homeless males of which 965 are unsheltered.
- There are 750 chronically homeless individuals on any given day in Imperial County.

In Imperial County, 87 percent of those experiencing homeless are unsheltered. Factors contributing to homelessness include the lack of housing affordable to lower income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, alcohol and substance abuse, domestic violence, and the de-institutionalization of the mentally ill. Homeless people, victims of abuse, and other individuals often have housing needs that are not being met by the traditional housing stock. These people require temporary housing and assistance at little or no cost to the recipient.

Resources

Homelessness is a continuing national problem that persists within local cities and communities in Imperial County. The City of El Centro is the largest community in the County of Imperial and serves as the service center for the homeless and others requiring support services. Three of the five emergency shelters are in El Centro. Womanhaven (d.b.a. Center for Family Solutions) operates two emergency shelters for woman and children in El Centro with a total of 31 beds and Catholic Charities operates the House of Hope woman's shelters with 27 beds. Catholic Charities also operates the Our Lady of Guadalupe Shelter for men in Calexico with 50 Beds. The Neighborhood House Shelter, also in Calexico, has a capacity of 46 beds for women and children. It is estimated that the emergency shelters within the County of Imperial have a total number of 154 beds available at any given time for the homeless.

Many of these shelters provide adult counseling, housing, independent living skills training, and advocacy services for its clients. Additional homeless support services include housing referral, clothing, and assistance with filling out social service forms, self-service laundry, meal distribution, and independent living skills training. More agencies and nonprofit groups provide additional support to the homeless such as the Salvation Army, Imperial County Social Services Department, the Imperial Valley Food Bank, Clinicas de Salud de Pueblo, Inc. and Campesinos Unidos.

Although there are currently no emergency shelters located in the City of Imperial, nor is it anticipated that development of a shelter is warranted at this time, the city wants to ensure that any future demand for emergency housing be facilitated in compliance with State law.

Disability Living

The US Census defines six types of disabilities: sensory, physical, mental, self-care, go-outside-home, and employment. Sensory and physical disabilities are determined to be "long-lasting conditions." Mental, self-care, go-outside-home and employment disabilities are defined as conditions lasting six months or more that make it difficult to perform certain activities. Some residents suffer from disabilities that require living in a supportive

or institutional setting. The living arrangement of disabled persons, however, depends on the severity of the disability. Many live at home independently or with other family members.

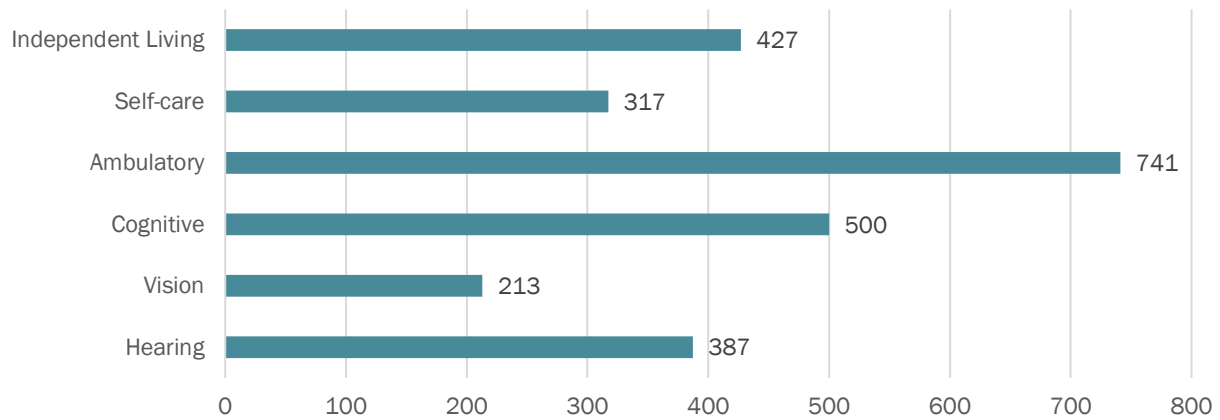
To maintain independent living, disabled persons may need assistance. This can include special housing design features for the disabled, Income support for those who are unable to work, and In-home supportive services for persons with medical conditions among others. Services are typically provided by both public and private agencies.

There are 2,585 persons in the SCAG data base, reported to be living in the City of Imperial with some type of disability. According to the ACS Narrative Profile for the City, 7.8 percent of residents reported a disability from 2015-2019. The likelihood of having a disability varied by age - from 4.6 percent of people under 18 years old, to 4.3 percent of people 18 to 64 years old, and to 44.4 percent of those 65 and over. State and federal legislation mandates that a specified number of units in new or rehabilitated multi-family apartment complexes be accessible to individuals with limited physical mobility. Imperial County Building Code inspectors enforce these mandates.

Senate Bill (SB) 812, which took effect January 2011, requires an analysis of the special housing needs of persons with developmental disabilities. A "developmental disability" is defined as a disability that originates before an individual becomes 18 years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. This includes mental retardation, cerebral palsy, epilepsy, and autism. Having a disability may impede a person from working and therefore income is often limited. As a special needs group, persons with developmental disabilities often have difficulty finding safe and affordable housing, which is vital to their stability.

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate.

Figure 24: Disability by Type



Source: American Community Survey 2014-2018 5-year estimates.

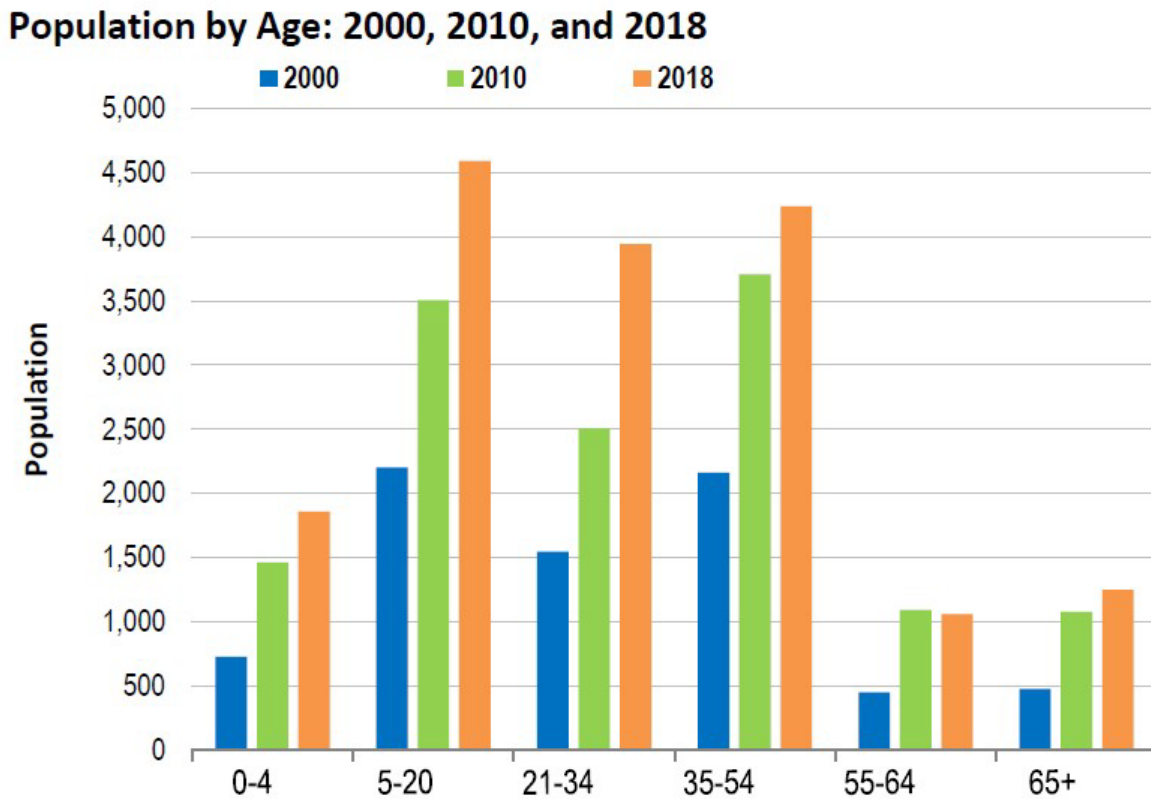
Resources

Housing-accessibility modifications, proximity to services and transit, and availability of group living opportunities represent some of the considerations that are important in serving this group. The 2014-2018 American Community Survey determined that approximately 13% of Imperial households (2,585 residents) reported a disability, however the statistic does not provide a representative sample of individuals with "developmental disabilities." Housing types appropriate for people living with a developmental disability include rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special homeownership programs, HUD housing, and SB 962 homes. The recently constructed Imperial Gardens Apartments has four ADA units available within the City of Imperial.

Seniors

Elderly households have special needs typically associated with smaller units, units located within proximity to services, and many times units with special accommodations. The housing needs of this group can be partially addressed through single room occupancies, second units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs.

Figure 25: Population by Age: 2000, 2010, and 2018



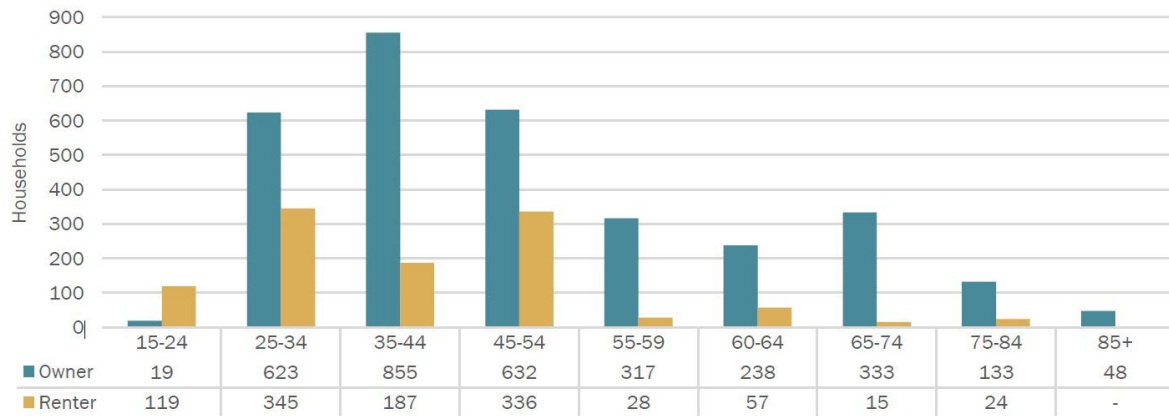
Sources: 2000 & 2010 U.S. Decennial Census; American Community Survey, 2017; Nielsen Co.

According to the ACS Narrative Profile for the City, 8.6 percent of the City’s population was 65 years and older, which is lower than the regional share of 13%. As shown in Figure 25, the number of seniors in Imperial has increased over the last two decades from just under 500 to approximately 1,250. However, from 2000 to 2018, seniors share of the population varied from approximately 6 percent in 2000, then to 8 percent in 2010 but then dropped to 7 percent in 2018, despite the constant increase in population.

As shown in Figure 26, in 2018, senior households who owned their homes (514) is significantly higher than senior households who rent their homes (39).

Figure 26: Housing Tenure By Age

Housing Tenure By Age



American Community Survey 2014-2018 5-year estimates.

Resources

Imperial has two subsidized housing complexes targeting seniors: the Imperial Gardens with 80 units and the Imperial Villa Apartments with 39 units. Imperial Gardens has 64 one- bedroom units and 16 two-bedroom units. To assist Imperial's aging population, Catholic Charities offers a Senior Nutrition Program for home delivered meals. Free transportation is also provided to a site in El Centro where seniors can enjoy congregate meals.

3.0 Housing Constraints

The provision of an adequate and range of housing opportunities to address the identified needs in the community is an important goal for the City of Imperial. However, many factors can constrain the development, maintenance, and improvement of housing. These include governmental constraints such as codes and development standards and non-governmental constraints including market, physical and environmental constraints. The local jurisdiction, or the City of Imperial, may have control over some of the governmental constraints as these are typically applied by the City itself. Non-governmental constraints on the other hand are market driven and are therefore much more difficult for the City to control, if at all. The City can, however, make available housing programs to its local residents that can assist overcoming these non-governmental types of constraints. This section addresses the potential constraints that may affect the supply and cost of housing in the City of Imperial.

Governmental Constraints

Local policies and regulations can impact the price and availability of housing and the provision of affordable housing. Unlike, the previous non-governmental constraints, land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors may constrain the maintenance, development, and improvement of housing. This section discusses potential constraints as well as policies that encourage housing development in Imperial.

Land Use Control and Residential Development Standards

The City regulates the type, location, density, and scale of residential development primarily through its General Plan and Zoning Ordinance. In general, the City's zoning and land use regulations are designed to balance the goal of providing affordable housing opportunities for all income groups while protecting the health and safety of residents and preserving the character of existing neighborhoods.

The Land Use Element of the Imperial General Plan sets forth the policies that guide residential development in the City. The City last revised the General Plan Land Use Plan in 1992. The residential designations and their corresponding densities include the following:

- Residential Rural - 0.5-1.0 U/A
- Residential Low Density - 1.0-2.0 U/A
- Residential Single Family - 2.0-5.0 U/A
- Residential Condominium - 5.0-30.0 U/A
- Residential Apartments - 20.0-30.0 U/A
- Planned Unit Development - 20.00-30.00 U/A
- Mobile Home Park - 7.0 U/A

Provisions for a Variety of Housing Opportunities

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 a variety of types of housing for all income levels. The City's residential land use designations provide for the development of a wide range of housing types including single-family dwellings, mobile homes, manufactured housing, condominiums, multi-family units at various densities, and includes mixed use development (commercial/residential) for areas in the downtown Village Commercial Zone. Therefore, the land use regulations are not considered a constraint to residential development. The Residential

Commercial Mixed-Use designation allows for multi-family residential units within areas of Imperial Downtown also designated for commercial uses.

Zoning regulations are designed to protect and promote the health, safety, and general welfare of Imperial residents and to preserve the character and integrity of existing neighborhoods. The Imperial Zoning Ordinance provides for the following residential districts:

Residential Rural- (RR): This zone is intended as an area for very low-density residential uses with minimum lot sizes of one (1) acre and maximum densities of 1.0 unit per net acre. It is intended to permit the continuation of agricultural and farm uses while allowing the development of single family residential. Additional uses are permitted that are complementary to, and can exist in harmony with, a rural residential neighborhood.

Residential Low Density (RL): This zone is intended as an area for low density residential use with a minimum lot size of 20,000 square feet and maximum density of 2.0 units per net acre. This zone is a transitional area outside of the critical area of the Imperial County Airport but still within the rural portions of the City.

Residential Single Family (R-1): This zone is intended as an area for single family residential development on minimum lot sizes of 6,500 square feet and maximum densities of 6.0 units per net acre. Additional uses are permitted that are complementary to, and can exist in harmony with, a single-family residential neighborhood.

Residential Condominium (RC): This zone is intended as an area for the development of Residential Condominiums with provisions for adequate light, air, open space and landscaped areas at a maximum density of 20 units per net acre. Additional uses are permitted that are complementary to, and can exist in harmony with, a residential condominium development.

Residential Apartment (RA): This zone is intended as an area for the development of Residential Apartments with provisions for adequate light, air, open space and landscaped areas at a maximum density of 30 units per net acre. Additional uses are permitted that are complementary to, and can exist in harmony with, a residential apartment development.

Mobile Home Park (MHP): The Mobile Home Park Zone is intended for the exclusive development of mobile home parks with a maximum density of 7 units per net acre. Additional uses are permitted that are complementary to, and can exist in harmony with, a mobile home park development.

Village Commercial (VC): This zone is intended for village commercial uses in the downtown area, a centralized area unified by architectural, landscaping design and development standards. Mixed use developments combining residential uses and permitted non-residential uses are allowed without a CUP.

The City of Imperial's adopted policies and zoning regulations control the amount and distribution of land allocated for different land uses in the City. The City of Imperial Zoning and Residential Development Standards depicted in the chart below are not overly restrictive and do not pose a constraint on housing development and affordability.

Table 13: City of Imperial Residential Development Standards

General Requirements	RR	RL	R-1	RC	RA
1. Density-maximum units per net acre.	0.5-1.0	2.0	6.0	12-20*	20-30*
2. Net lot area (in sq.ft.)	1 acre	20,000	6,000	7,500	7,500
3. a) Lot width (in feet)	110	100	65	150 int. 70 corner	150 int. 165 corner
b) Cul-de-sac or odd shaped lot width (in feet)	30	30	30	-----	-----
c) Flag Lots	20	20	20	-----	-----
4. Lot Depth (in feet)	150	150	100	100 int. 150 corner	165 int. 135 corner
5. Front Yard Setback	40	30	20	20	20
6. Side Yard Setback	20	15	5	15	10
7. Side Yard Setback- street side	20	15	10	20	20
8. Rear Yard Setback (in feet)	50	40	10	20	10
9. Lot Coverage, maximum	35%	35%	50%	50%	60%
10. Building and structure height (in feet)	35 feet or 2 stories, whichever is less				

Source: City of Imperial Municipal Code

NOTE: In the RC and RA zones, approval of projects at the maximum density shall only be given on the basis that the project exceeds the standards of the zone and the General Plan. Any density beyond the minimum permitted by the zone will require Planning Commission and City Council approval.

The City of Imperial does not establish definitions for housing types in the Zoning Ordinance but rather has descriptions of possible housing types within certain zones listed within the Land Use Element of the General Plan.

Country Home Sites are low density single-family detached homes on large parcels that may include agricultural activities (farming and livestock). Typical lot size is 1 acre. The maximum density is 0.5 to 1 unit per acre.

Ranch Homes represent a transitional area between the Rural Residential use and other higher density residential uses. Typical lot size is 20,000 square feet, and maximum density is 1 to 2 units per acre.

Single Family Homes are the primary residential land use designation within this category and within the City. Typical lot size is 6,000 square feet. A majority of the residential uses within the City are located within this designation. The density of this category is 2 to 5 units per acre.

Condominiums are buildings or group of buildings in which units are owned individually, but the structure, common use areas, and facilities are owned by all owners on a proportional, undivided basis. The density of this category is 5-20 units per acre. Typical lot areas are approximately 7,500 square feet.

Townhomes are buildings of attached dwellings arranged side by side, with above grade to provide rooms and unit access from the street. The building is located at the front of the property, with the garage at the rear, ideally separated by a rear yard. The density range is generally between 5-15 units per acre with typical lot areas of 7,500 square feet.

Duplex/Triplex/Fourplex are buildings with two or more dwellings surrounded on all four sides by setbacks and may contain dwelling units and/or commercial uses as allowed by the zone. Onsite open space is provided through a rear yard for all the dwellings or through individual yards for each dwelling. The density range is generally between 5 and 10 units per acre. Lot areas are typically 7,500 square feet.

Apartments are structures containing three or more attached dwelling units for the use of individual households. These structures are typically owned by a single owner, with individual units leased to the occupants. The maximum density of these structures is 30 units per net acre.

High Density Condominiums are similar to high density apartments, the maximum density of these structures is 30 units per net acre, generally developed as an attached product that is sold to individual owners.

Mobile Home Parks are not an independent category, but rather allowed under the High-Density Residential land use. Mobile Homes Parks will not be designated to specific areas for the exclusive development of mobile home units. Parks are typically equipped with shared facilities for recreation, laundry, and storage. Density in this category ranges from 5 to 8 dwelling units per acre. Total area should be at least 4,000 square feet per unit space.

The City of Imperial's adopted policies and zoning regulations control the amount and distribution of land allocated for different land uses in the City. The City of Imperial Zoning and Residential Development Standards depicted in Table 13 above are not overly restrictive and do not pose a constraint on housing development and affordability. Nonetheless, the City will continue to adopt as action item an amendment to the zoning code to allow up to three stories in the Residential Condominium Zone, Residential Apartment Zone and for multi-family housing in the Planned Unit Development Zones and will remove the requirement of Planning Commission approval for the maximum densities in these zones to facilitate housing opportunities for lower income households.

The City uses the default density development standards when it comes to developing below the density standards. There has yet to be a developer that requests to develop below the ordained densities. When there is a request to develop below the development standards for said zone, the request would be processed through the Planning Commission and the City Council for approval first. That process usually would take between 2 to 3 months. Then building permit review, per state law is given 30 days for the initial building permit application review for development.

Table 14 below presents the City’s parking requirements. As part of the future effort to update the City’s General Plan, the City will be looking at the parking standards and height restrictions/number of stories for residential projects and whether any changes are necessary to further facilitate housing development.

Table 14: Parking Requirements for Residential Zones

Zone	RR	RL	R-1	RC	RA
Covered Parking Spaces per Unit ¹	2	2	2	1.0 space (1 garage)/ studios or 1 bedroom unit	1.0 space (1 covered)/ studios or 1 bedroom unit
				1.5 spaces (2 garages)/ 2 bedroom unit	1.5 spaces (1 covered)/ 2 bedroom unit

Zone	RR	RL	R-1	RC	RA
				2.0 spaces (2 garages)/ 3 bedroom > unit	2.0 spaces (1 covered)/ 3 bedroom > unit

Source: City of Imperial Municipal Code

¹ Covered parking is a requirement for safety reasons due to the harsh weather of the region.

Table 15: Housing Types Permitted by Zone

Residential Use	ZONE							
	RR	RL	R-1	RC	RA	MHP	C2	VC
Single Family Unit	P	P	P	P	P	P ¹	X	X
Second Single Family Unit	CUP	CUP	CUP	CUP	CUP	X	X	X
Accessory Unit w/o Kitchen	P	P	P	P	P	X	X	X
Mobile Home ²	P	P	P	X	X	P	X	X
Duplex	X	X	X	CUP	CUP	X	X	X
Multiple Dwellings-Rental	X	X	X	P	P	X	X	X
Multiple Dwellings-Condo	X	X	X	CUP	X	X	X	X
Group Homes Under six (6) people	P	P	P	P	P	X	X	X
Group Residential ³	X	X	X	CUP	CUP	X	CUP	CUP
Convalescent Homes ⁴	CUP	CUP	CUP	CUP	CUP	X	CUP	X
Transitional and Supportive Housing under six (6) people	P	P	P	P	P	X	X	X
Transitional and Supportive Housing over six (6) people	X	X	CUP	CUP	CUP	X	X	X
Emergency Shelter	X	X	X	X	X	X	P	X
Mixed Uses (Residential/Commercial)	X	X	X	X	X	X	X	P

X=Not listed as Permitted Use

P=Permitted

CUP=Conditional Use Permit

Source: City of Imperial Municipal Code

¹Single Family Dwelling used for caretakers when located on the same site

²Mobile Home on individual lots and permanent foundations

³Includes Homeless Shelters, Transitional Housing, Boarding or Rooming Homes, and Retirement Homes

⁴Sites must be two net acres or greater in size

Housing for Persons with Disabilities/Group Care Facilities

Persons with disabilities have several specific housing needs, including those related to design and location. Design needs generally include the removal of architectural barriers that limit the accessibility of dwelling units and construction of wheelchair ramps, railings, etc. Location needs include accessibility to public transportation, commercial services, healthcare, and supportive services. Some persons with disabilities need group housing opportunities, especially those who are lower income or homeless.

California statutes require that the Housing Element include an analysis of the Zoning Ordinance, permitting procedures, development standards, building codes, and permit processing fees to identify potential constraints for housing for persons with disabilities. The following discussion addresses these issues and determines that no specific City policy or regulation serves to impede the access that persons with disabilities must have housing that suits their specific needs.

Zoning and Land Use

The Lanterman Development Disabilities Service Act of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer persons with disabilities is a residential use for the purpose of zoning. A State-authorized or certified family care home, foster home, or group home serving six or fewer persons with disabilities or depended or neglected children on a 24-hour-a-day basis is considered a residential use that is permitted in all residential zones. Under the State Lanterman Act, small residential facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential districts. The City will need to amend its Zoning Ordinance to comply with this State law. The City's land use policies and zoning provisions do not constrain the development of such housing, but they are not currently listed as a use allowed by right in the RC, RA, VC and C-2 Zones and not listed as an allowed use in the RR, RL and R-1 Zones. Group homes serving up to six persons are currently permitted and allowed in all residential zones, even without the language in the zoning code.

To better facilitate the development of housing for persons with disabilities, the City will clarify the definitions of "group residential" and "group care facilities" in its zoning code and ensure that group facilities for six people or less are permitted by right per Health and

Safety Code Sections 1267.8, 1566.3, and 1568.08. As a part of Program 15, the amendment will further include provisions for facilities serving more than six people to be allowed with a conditional use permit in the R-1 zone and by right for the following zones: RC, RA, VC and C-2.

Building Codes

The City enforces Title 24 of the California Code of Regulations that regulates the access and adaptability of buildings to accommodate people with disabilities. Government Code Section 12955.1 requires that ten 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 be subject to the following building standards for people with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- At least one powder room or bathroom shall be located on the primary entry level served by an accessible route.
- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include but are not limited to kitchens, powder rooms, bathrooms or hallways.
- Common use areas shall be accessible.
- In common tenant parking is provided, accessible parking spaces are required.

No unique Building Code restrictions are in place that would constrain the development of housing for people with disabilities. Compliance with provisions of the City’s Municipal Code, California Code of Regulations, California Building Standards Code, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building & Safety Division of the Community Development as part of the building permit submittal.

Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility

impairments. Whether a particular modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.

The City further makes reasonable accommodations (i.e., modifications or exceptions) from 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 such as waiving a setback requirement. The City also encourages residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements and ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility. The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. Requests for special structures or appurtenances (i.e., access ramps or lifts) needed by persons with physical disabilities are allowed without a variance or encroachment permit and are not considered structures subject to setback requirements.

The City of Imperial has not identified any zoning or other land-use regulatory practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals or groups of individuals. For example, the City does not restrict occupancy of unrelated individuals in group homes and conditions placed on any required CUPs are minimal, standard and do not pose a constraint on development. Also, the City permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of uses in any part of the City. In addition, the Land Use Element of the General Plan does not restrict the siting of special needs housing.

Despite the lack of constraints described above, the City must have a written procedure to provide reasonable accommodation in zoning and land use. Therefore, included in Program 15, the City will create and adopt a Reasonable Accommodation Ordinance to establish the procedures and guidance for reasonable accommodation in accordance with State law. Additionally, it should be noted that no new applications for housing for persons with disabilities or a group care facility have been submitted to the City in the previous planning period.

Public Infrastructure Improvements and Service Constraints

Another factor adding to the cost of new construction is the availability of adequate infrastructure - major and local streets; curb, gutters, and sidewalks; water and sewer lines; and street lighting - which if lacking or substandard are required to be built or installed along in new residential development and the developers are responsible for all on-site improvements and half width improvements on adjacent roadways under most situations. These public improvements are typically dedicated to the City, which is then

responsible for their continued operation and maintenance. The cost of these facilities is borne by the developer, added to the cost of new housing units, and eventually passed onto the homebuyer or property owner.

The costs of the construction and maintenance of improvements are periodically analyzed as part of the City's Service Area Plan, the City's Capital Improvement Program, and the City's Development Impact Fees. Specific standards and fees related to those improvements are described in the Development Impact Fees and Exaction section, below. The City's Service Area Plan was last updated in June 2015. While any identified infrastructure improvement needs may add to the cost of housing development, they are typical improvements needed for most developments throughout the region and should not constrain housing development in Imperial.

Affirmatively Furthering Fair Housing (AFFH)

AB 686 requires that all housing elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under state law, AFFH means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” A detailed analysis of fair housing is included in Appendix C.

The City has completed the following:

- Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes.
- Conduct an Assessment of Fair Housing (Appendix D), which includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.
- Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.

Development Impact Fees and Exactions

Like cities throughout California, the City of Imperial collects development fees to recover the capital costs of providing community services and the administrative costs associated with processing applications. New housing typically requires payment of the following fees: school impact, park in-lieu, sewer and water connection and, building permit; and a variety of handling and service charges. These fees comprise a significant part of housing costs in the City. In addition, subdivisions and multifamily projects may incur the cost of preparing

environmental impact reports, traffic studies, soils reports, and filing fees for tentative and final maps. Fees, land dedications, or improvements are also required in most instances to provide an adequate supply of public parkland and to provide necessary public works (streets, sewers, and storm drains) to support the new development.

While such costs are charged to the developer, most, if not all, additional costs are passed to the ultimate product consumer in the form of higher home prices or rents. Impact fees for residential projects shall be paid on a pro rata basis for each dwelling unit prior to certificate of occupancy. The Imperial Unified School District serves the City. The elementary and high schools operate under one administration. The School District assesses a school impact fee on all new development. The school impact fee on commercial land is \$0.66 per square foot. The fee of \$4.08 per square foot on residential land can add significantly to the cost of development. Currently, there are no exemptions from the school impact fee.

Impact fees, which are typically assessed on a per-unit basis, are often required to fund the cost of services, infrastructure and other public facilities that serve new housing developments. In the City of Imperial, these impact fees are largely tied to major capital Improvement projects such as the Water Treatment Plant & Distribution System or the Wastewater Treatment Plant and Collection System. Like other jurisdictions, the City of Imperial charges a variety of fees and exactions during the permitting process to cover the costs of providing these necessary services and facilities. In general, these fees can be a constraint on housing development if they are excessive.

Excessive fees can limit market rate affordability because the additional cost borne by developers is simply passed on to potential borrowers and contributes to the overall increased housing unit cost.

Table 16: Current Development Impact Fee Schedule

	Single Family Residential (per dwelling unit)	Multi-Family Residential (per dwelling unit)	Commercial and Industrial
Administrative Facilities	\$253.91	\$253.91	\$235.54 (per 1,000 sf)

	Single Family Residential (per dwelling unit)	Multi-Family Residential (per dwelling unit)	Commercial and Industrial
Fire Facilities	\$116.32	\$116.32	\$107.90 (per 1,000 sf)
Law Enforcement Facilities	\$242.17	\$242.17	\$224.65 (per 1,000 sf)
Library Facilities	\$263.52	\$245.14	No Fee
Park Facilities	\$1,504.92	\$1,399.92	No Fee
Circulation Facilities	\$514.76	\$357.69	\$22.43 per ADT
Total	\$2,895.59	\$2,615.16	Varies (land use dependent)
Water Capacity Fees = 2,213.78 per equivalent dwelling unit (EDU) Sewer Capacity Fees = 1,844.82 per equivalent dwelling unit (EDU)			

Source: City of Imperial Planning Department Website

Planning and Environmental Fee Constraints

In addition to development impact fees, residential projects within the City of Imperial are also usually subject to Planning Department administration/processing ("planning") and environmental fees. These fees vary widely with each residential project as they are a result of numerous variables, such as the type of entitlements requested by the developer, the level of environmental evaluation dictated by the California Environmental Quality Act (i.e. Exemption, Negative Declaration (ND), Mitigated Negative Declaration (MND), or Environmental Impact Report (EIR)), and the number of acres and units proposed for development. For example, new residential projects on a single lot and not subject to a zone

change or general plan amendment may incur no planning or environmental fees aside from a site plan review fee.

Alternatively, a residential project on 50 acres with 300 lots and requiring the processing of a subdivision map, zone change/pre-zoning, general plan amendment, annexation and an EIR may be substantial as environmental studies such as an Air Quality Assessment, Traffic Study, Biological Study, Noise Study etc. The costs associated with environmental studies and reports could become a constraint on affordability considering specialized environmental studies range from \$10,000 to \$75,000 each and EIRs can cost well over \$100,000 which may lead to findings that could trigger additional and costly mitigation measures.

Fees are charged at cost at a time and material basis and may necessitate additional deposits. Costs per lot are based on "economies of scale": the addition of more lots (an increase in overall density) would result in a lower fee per unit. The planning and environmental fees for the City of Imperial are comparable to the surrounding jurisdictions.

Community Development Planning Land Use Fee Schedules

- Applicant is responsible for any fees associated with the City of Imperials' City Clerk office and any department required for processing the said application from the Imperial County.
- Fire Department Fees are paid and processed separately from the Community Development Department.
- The cost for such consultants shall be a charge against the project and is in addition to the fees set forth. (Resolution 2004-05)

Table 17: California Environmental Quality Act Fees

Permit Type:	Fee:	Deposit:
Certified Regulatory Program	\$1074.25	-----
Environmental Impact Report	\$923.00	\$15,000.00
Initial Study & Mitigated/Negative Declaration	\$923.00	\$15,000.00
Notice of Exemption	\$187.00	\$500.00

Source: City of Imperial Development Fee Schedule

Table 18: Planning Application Fees

Permit Type:	Fee:	Deposit:
Certificate of Compliance	\$247.00	-----
Home Occupation	\$235.00	-----
Lot Line Adjustment	\$335.00	\$500.00
Lot Merger	\$335.00	\$500.00
Lot Split	\$335.00	\$500.00
Permit to preform work	\$97.50	-----
Pre-Application Meeting	\$643.00	-----
Time Extension	\$335.00	-----
Zoning Information Letter	\$235.00	-----
Appeals to Planning Commission	\$530.00	-----
Conditional Use Permit	\$1,173.00	\$500.00
Variance Permit	\$1,173.00	\$500.00
Minor Subdivision (up to 4 parcels)	\$933.50	-----
Tentative Parcel Map	\$335.00	-----
Major Subdivision (more than 4 parcels) Tentative Tract Map	\$978.00	\$15,000.00
Final Parcel Map Waiver	\$335.00	\$1,000.00
Final Tract Map	\$978.00	\$5,000.00
Final Subdivision Map	\$978.00	\$5,000.00
Parcel Map Waiver	\$335.00	-----
Revision to Acreage	\$1,173.00	Consultant Fees if needed

Permit Type:	Fee:	Deposit:
Revisions to map (up to 6 months after disapproval)	50% of original fee	-----

Source: City of Imperial Development Fee Schedule

While fees represent a substantial part of residential construction costs, the City’s fees are in line with those charged in other neighboring communities. The City has one of the lowest planning fees within the Imperial County.

A brief survey demonstrates the below average cost in planning fees charged by the City. For example, the City requires a fee of \$1,048.00 for a zone change, while all other cities’ fees, except Imperial, are higher. The low fees in the City, do not act as a constraint against building affordable housing and as a result, fees have not affected the City’s competitiveness for affordable housing with neighboring communities.

Table 19: Planning Application Fees- Comparison with Surrounding Jurisdiction 2021

Jurisdiction	General Plan Amendment	Zone Change	Tentative Tract Map	Variance
City of Imperial	\$1,048.00	\$1,048.00	\$978.00	\$1,173.00
City of El Centro	\$3,713.15	\$2,970.52	\$2,015.71	\$1,060.90
City of Holtville	\$750.00 +\$5 per acre	\$5,00.00 +\$5 per acre	\$800.00 + \$10.00 per lot	\$300.00
City of Calexico	\$22,595.00 (estimated)	\$8,397.00 (estimated)	\$22,839 (estimated)	\$867.00
City of Brawley	\$2,100	\$2,000.00	\$2,500.00	\$800.00

Source: Various City Websites

Table 20 provides a fee worksheet for two prototypical housing projects based on applications processed in the City. Altogether, developer fees for a prototypical single-family dwelling total \$5,481 (approximately 3 percent of the total development cost). Fees for a prototypical multi- family project are somewhat lower on a per-unit basis at \$4,230 (approximately 4 percent of the total development cost).

Table 20: Development Fees for a Typical Unit

Fee Type	Single-Family	Multi-Family
Permit Processing Fees	\$2,586	\$1,615
Impact Fees	\$2,895	\$2,615
Total estimated fees per unit	\$5,481	\$4,230
Typical estimated cost of development per unit	\$199,625	\$96,774
Estimated proportion of fee cost to overall development cost per unit	2.74%	4.37%

Sources: City of Imperial, 2021.

NOTE: Single-family prototype is a 3-bedroom, 1,810 square-foot home with 400 square-foot attached garage. Multi-family prototype is based on a 28-unit apartment complex with an average unit size is 966 square feet.

Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Development impact fees are required to provide essential services and infrastructure to serve new residents. Impact fees are governed by State law to demonstrate a nexus between development and potential impacts. State law also requires the proportionality test to ensure the pro rata share of costs to provide services and infrastructure by individual developments is reasonable.

The City recognizes that planning/permitting and development fees add to the cost of residential development. To mitigate the impact of permitting and impact fees on the cost of residential development, the City will consider deferment of fees for affordable housing projects on a case- by-case basis.

Development Permit Procedures

The City reviews all applications for development to ensure the construction of projects that contribute in a positive manner to the community and improve quality of life. This section describes the permitting requirements, procedures, and timeframes for Site Plan Review, Conditional Use Permits, and Subdivisions. The City’s permit processing procedures and processing times are in line with industry standards and do not unduly constrain the development of housing.

Site Plan Review

Site Plan Review applies to all projects involving two or more dwelling units on the same lot, second dwelling units, and developments that require a CUP or rezone. Site Plan Review does not apply to individual single-family dwellings proposed on existing legal lots. The purpose of Site Plan Review is to:

- Provide a process for the reviewing official or body to verify a proposed project's compliance with Zoning Ordinance development, design, and use standards;
- Assure landowners, business owners and developers that proposed uses, structures, and site improvements comply with the Zoning Ordinance provisions before preparation of plans for building permits; and
- Provide a means of streamlining the development review process through administrative review of development proposals.

Depending on the project and type of permit required, Site Plan Review is completed by the Community Development Director, Planning Commission, or City Council. The Community Development Director's Site Plan Review is ministerial, and no noticing or public hearing is required.

The Planning Commission has the authority to approve, approve with conditions, or deny site plans for new structures, for variances, and conditional use permits. The City Council has the authority to approve, approve with conditions, or deny site plans for projects involving a change of zone when no other discretionary approvals or permits are required.

Conditional Use Permits

Land uses that require a CUP generally have a unique and distinct impact on the area in which they are located or are capable of impacts to adjacent properties unless given special review and conditions. Depending on the use, CUP requests are heard by the Planning Commission and, where required by the zoning ordinance, the City Council. The City Council has final authority to approve conditional use permits for buildings or structures with heights greater than permitted by the zone, density bonuses, mobile home parks, planned unit developments. The Planning Commission has the authority to approve conditional use permits for all other uses, although its decision may be appealed to the City Council.

The Planning Commission or City Council must make the following findings prior to approval of a CUP:

- The use applied for at the location set forth in the application is properly one for which a conditional use permit is authorized by the Zoning Ordinance;

- Said use is necessary or desirable for the development of the community, is in harmony with the various elements or objectives of the general plan, and is not detrimental to existing uses or uses specifically permitted in the zone in which the proposed use is to be located;
- The site for the intended use is adequate in size and shape to accommodate said use, and all yards, setbacks, walls or fences, landscaping and other features are required to adjust said use to those existing or permitted future uses on land in the neighborhood; and
- The site for the proposed use relates properly to streets and highways which are designed and improved to carry the type and quantity of traffic generated or to be generated by the proposed use.

The findings apply uniformly to all uses that require a CUP and conditions of approval must be deemed necessary to protect the public health, safety, and general welfare.

Lot Line Adjustments

The City allows for ministerial lot line adjustments to facilitate the development of multi-family and mixed-use buildings across property lines, so long as the adjustment does not lead to an increase in the number of legal lots. The Community Development Director has authority to approve, conditionally approve, or deny the lot line adjustment within 15 days of receipt of a complete application. A lot line adjustment will be approved upon determination that the adjustment plat meets the requirements of the Subdivision Ordinance and complies with the General Plan and Zoning Ordinance.

Subdivisions

The subdivision of land into multiple lots pursuant to the California Subdivision Map Act requires discretionary approval by the City. The Planning Commission can review and approve or recommend denial of tentative maps of four or fewer parcels. The Planning Commission also recommends approval, conditional approval, or denial of tentative maps of five or more parcels. The City Council has final authority to approve, conditionally approve, or deny all tentative maps of five or more lots or parcels; and to approve, conditionally approve or deny any tentative map of four or fewer parcels for which the Planning Commission recommended denial or an appeal has been made.

The reviewing and approving body must deny approval of a tentative map if it makes any of the following findings:

- That the proposed map is not consistent with the General Plan and applicable specific plans;

- That the design or improvement of the proposed subdivision is not consistent with the General Plan and applicable specific plans;
- That the site is not physically suitable for the type of development;
- That the site is not physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or type of improvements is likely to cause serious public health problems; and
- That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision; provided, however, the city council may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public.

Permit Processing Time Frames

Permit processing time frames vary depending on the type, location and environmental review requirements of the proposed development. Ministerial Site Plan Review and land use applications that are Categorical Exempt from CEQA typically take between one and four months to process. Projects that require only a Negative Declaration can typically be processed in a six-month time frame. Large subdivisions may require a longer processing time frame due to the information required and public comments received. Projects requiring an Environmental Impact Report (EIR) will be able to use the General Plan EIR for tiering, which should reduce processing time. Processing time may vary due to the volume of applications, the type and number of changes made to the project by the applicant to address impacts, and the size and complexity of the projects.

Building Permit Procedures and Code Enforcement

Building Permits are processed in-house. The City implements Title 24 provisions of the most current California Building Code for the City, which includes the Uniform Plumbing Code, Uniform Mechanical Code, National Electric Code, California Fire Code, and the California Energy Code. The City does not have any locally adopted building codes. While adding to the cost of Residential development, enforcement of the California Building Code is necessary to ensure the safety of current and future residents of Imperial and therefore is not considered an unreasonable constraint on housing production.

Due to the increasing number of aging units many of the units no longer conform to the new building code standards. There may be instances when severe neglect and deficiencies pose a serious safety concern. When a complaint is filed with the City, it is forwarded to the Building Inspector/Code Enforcement Officer to follow up on the complaint and determine if the California Building Code has been violated, or in need of enforcement, and the necessary steps to remedy the condition. Income-qualified homeowners are referred to the appropriate housing rehabilitation programs for assistance.

Other Local Ordinances

After a review of the City of Imperial’s local ordinances, none have been identified that would impact the cost and supply of residential development. For example, the City does not have a short-term rental ordinance or an inclusionary ordinance that would constrain the housing market.

State Tax Policies and Regulations

Proposition 13

Proposition 13, a voter initiative that limits increases in property taxes except when there is a transfer of ownership, may have increased the cost of housing. The initiative forced local governments to pass on more of the costs of housing development to new homeowners.

Article 34

Article 34 of the State constitution requires that low-rent housing projects developed, constructed, or acquired in any manner by a public agency must first be approved by a majority of the voters. Requiring such approval can act as a barrier to the development of affordable housing due to the uncertainty and delay caused by the process. To this date, the City has not had any projects that required invocation of Article 34. In general, the City assists with the development of affordable housing but does not act as developer or owner of the development.

Federal and State Environmental Protection Regulations

Federal and State regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs resulting from fees charged by local government and private consultants needed to complete the environmental analysis, and from delays caused by the mandated public review periods, are also added to the cost of housing and passed on to the consumer. However, these regulations help preserve the environment and ensure environmental quality for Imperial residents.

Non-Governmental Constraints

Land costs, construction costs, and market financing contribute to the cost of housing reinvestment and can potentially hinder the production of new housing development and adversely affect housing affordability. The City of Imperial updated all the “Development and Land Use Fees” during 2018. The City has the lowest development and land use fees when compared to neighboring cities. The City Councils vision and direction are that of which keep the fees low in efforts to better serve our citizens and promote all types of residential growth. Fees are an important tool, that the City of Imperial utilizes in efforts to balance the non-governmental constraints that affect development. Definitions of housing affordability can vary but in general, households should pay no more than 30 percent of its monthly income on housing costs. Households that pay more than this are considered "housing-cost burdened" and households that pay more than 50 percent are considered "severely housing-cost burdened." As previously noted in the Housing Affordability and Household Overpayment section, housing costs accounted for an average of 20% of total household income for renters and 22% for homeowners. The following are some of the factors that affect housing costs and affordability. Although many constraints are driven by market conditions, jurisdictions have some leverage in instituting policies and programs to address such constraints which is why each should be examined carefully.

Land Costs

The cost of raw land typically accounts for a large share of total housing production costs. Increased land costs appear to be one of the major contributing factors to the rapid rise in housing prices and rents. Land costs vary depending on whether the site is vacant or have an existing use that must be removed or whether the site has physical or environmental Issues that must be mitigated (i.e., steep slopes, soil stability, seismic hazards or flooding). The proximity and availability to infrastructure is also an important driver of land values and costs. According to 2019 statistics from the National Association of Home Builders, Single Family Price & Cost Breakdowns, land costs typically account for 18.5 percent of the total sales price for new single-family units¹. Supply and demand are important factors on land cost and the shortage of developable land can drive up the demand and cost of housing construction.

There is plenty of residential land within the City of Imperial that is vacant or not fully built out. Based on a review of undeveloped properties listed as for-sale or sold on Zillow

¹National Association of Home Builders website (2021)
<https://www.nahbclassic.org/generic.aspx?sectionID=734&genericContentID=271883&channelID=311>

between January and June 2021, asking prices for vacant single-family lots ranged from \$16,350 to \$1.7 million per acre. The wide range of costs represents a variety of prospective factors by the property owners with the highest land costs not reflective of the costs of the region. Since the range of land costs is wide, the average cost of \$425,000 per acre is the best representation of whether land costs are a constraint. In essence, land cost in Imperial is low and not considered to be a significant constraint in providing for affordable housing. Nonetheless, the City of Imperial does extend density bonuses to developers constructing affordable housing. The City intends to adopt this practice as a formal policy and no additional Program is warranted at this time to mitigate land costs.

Construction Cost

Construction costs vary widely according to the type of development. Construction of Multi-family housing is generally less expensive than single-family homes on a per-unit basis. However, wide variation within each construction type exists depending on the size of the unit and the number of quality amenities provided. Amenities such as fireplaces, swimming pools, tiling and other Interior features can significantly increase construction costs. Another factor related to construction costs is the number of units built at one time. As the number increases, overall costs generally decrease as builders are able to take advantage of economies of scale. This type of cost reduction is of particular benefit when density bonuses are used for the provision of affordable housing as previously noted. Currently the City of Imperial does not have any ordinances or programs in effect that assist with “construction costs” for developers.

The International Code Council (ICC) biannually updates Building Valuation Data (BVD) which provides the “average” construction costs per square foot. The square foot construction cost provided by the ICC does not include the price of the land on which the building is built. It does however consider everything from site and foundation work to the roof structure and coverings. The ICC provides estimates for the average cost of labor and materials for typical Type VA protected wood-frame housing. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes. In the 2018 edition of the Building Safety Journal, the ICC estimated that the average per square-foot cost for good-quality housing in the San Diego region was approximately \$113 for multi-family housing and \$125 for single-family homes.

Timing and Density

Markets can also constrain the timing between project approval and requests for building permits. In some cases, this may be due to developer’s inability to secure financing for

construction. In Imperial, the average time between project approval and request for building permit is typically two to four weeks.

By nature, development projects typically 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.

Availability of Financing

The extent of housing development, population growth, and new households are conversely, major determinants of home sale prices. An increase in population usually requires a corresponding increase in housing development. The City of Imperial housing development has kept pace with the population growth in the City and in the County and has attracted residents that would have otherwise gone to neighboring communities with more attractive housing options.

Market Financing

The City of Imperial currently does not have any active financing programs available for housing but there are local public and private entities that individuals of all income levels have access to for home buying purposes. There are Section 8 programs through-out the Imperial County available to individuals who qualify.

Low Income Housing Tax Credits (LIHTC) has become a critical source of capital for affordable housing developments targeting low and very low-income households. Competition for tax credits is highly competitive and developers must seek other forms of subsidies. The city utilizes a variety of funding sources to provide supplemental financing for subsidized housing developments, including the Community Development Block Grant (CDBG). The city has further lost one important leveraging source in the Redevelopment Housing set-aside. Although financing costs impact project feasibility, these problems are generally equal across jurisdictions and thus are not a unique constraint to housing production in Imperial. Implementation of these subsidy programs will help offset some of the referenced challenges.

Mortgage Financing

The availability of financing affects a person's ability to purchase or improve a home. 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 primary concern in a review of lending activity is to determine whether home financing is available to a city's residents. The data presented in this section include

the disposition of loan applications submitted to financial institutions for home purchase, home improvement, and refinance loans in the County of Imperial.

In 2019, a total of 3,551 households applied for conventional mortgage loans in the County of Imperial. According to HDMA data, 64% of the conventional mortgage applications were approved, 16% were denied, and 20% were withdrawn or closed for incompleteness. A total of 42% of households applied to use government- backed loans (Federal Housing Administration (FHA), Veteran Administration (VA), United States Department of Agriculture (USDA)) to purchase homes in the County of Imperial. The approval rate of these loans (75%) was higher than the approval rate of conventional loans (64%). Households are utilizing both conventional and government-backed financing to purchase homes in Imperial.

Additionally, 4% of Imperial households applied for home improvement loans in 2019. About 30% of these applications were approved and 49% were denied. In general, home improvement financing is less accessible during market downturns. High debt-to-income ratios coupled with lower property appraisals can make it more difficult to qualify for additional financing. Applications to refinance existing mortgages were more common with a total of 24% of applications.

Given the high rates of approval, refinancing and home purchase loans are generally available and not considered to be a major constraint in Imperial. However, lower approval rates and higher denial rates for home improvement loans suggest that limited access to home improvement of financing may be a constraint to the maintenance of the City's housing stock over time.

Efforts to Address Market Constraints

The City has taken into consideration the market constraints in the development of sites inventory by selecting site with characteristics similar to those that have been developed recently. In addition, as required by State law, the City offers density bonuses, incentives, and concessions that 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.

Infrastructure and Environmental Constraints

Additional factors that could constrain new residential construction are the cost and accessibility of adequate infrastructure such as street upgrades, water and sewer lines, lighting, etc. All of these utilities are required to serve and support residential development. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The cost of these facilities is generally borne by

developers, thereby increasing the cost of new construction. Specific costs and assessment of their potential constraints are described in the Public Infrastructure Improvements and Service Constraints and Development Impact Fees and Exactions sections, above.

Additionally, environmental constraints are another potential housing constraint, as they have the potential to limit the density and locations of housing developments due to various factors and hazards. A city's environmental setting and characteristics can greatly affect the feasibility and cost of developing housing.

The City of Imperial, in general, has not identified any significant environmental concerns for housing development because the City is not located within proximity to any potentially hazardous zones associated with the natural environment such as earthquake faults, flood zones, wetlands, etc. Typical to all jurisdictions in Imperial County, local environmental concerns can be tied to hydrology. The local soils do not percolate at the rates that control run-off as required by the State. All new development is required to retain stormwater on-site before discharging into an approved conveyance system. These conditions typically demand the construction of an on-site retention basin that may take up land that could have been used for the development of housing units, thus decreasing the overall affordability of a site. These concerns are experienced by all other jurisdictions in Imperial County, not just in the City of Imperial.

Opportunities for Energy Conservation

With the passage of the Global Warming Solutions Act of 2006 (AB 32), which requires all local jurisdictions in the State to reduce their carbon dioxide emissions to 1990 levels by 2020, the City of Imperial is increasing its efforts to promote environmentally friendly building practices. Opportunities for energy conservation can be found for both existing and future housing developments by either the physical modification of current structures or the incorporation of energy conservation features on the design of new residential development consistent with Title 24. The City of Imperial includes insulation and weatherproofing, landscaping and maximizing orientation, lowering appliance consumption and maximizing on solar energy as top priorities. The City has adopted policies and action plans to further these objectives.

New Development Energy Conservation

All new development requires a Title 24 Report which outlines measures to reduce energy consumption. These measures include low flow plumbing fixtures, efficient heating and cooling systems, dual pane windows, and adequate insulation and weather stripping. Proper insulation of homes could reduce the energy demand for cooling purposes especially in Imperial County where summer temperatures are known to reach 120 °F. The actual design of the units also contributes to conservation by the strategic location of

windows and openings in relation to the path of the sun to minimize solar gain in the summer and maximize solar gain in the winter or the location of openings and the use of ventilating devices that take advantage of natural air flow. The use of landscaping features can also contribute to energy efficiency such as use of deciduous shade trees and other plants to protect the home. On a larger scale, new development land uses can be situated to reduce the reliance of automobiles by encouraging mixed use, infill or providing pedestrian access to commercial and recreational facilities. In addition to these construction-based techniques, other methods include:

- Use of solar energy to heat or generate electricity;
- Use of radiant barriers on roofs to keep attics cool;
- Use of natural gas for dryers, stovetops, and other home appliances;
- High efficiency coating on windows to repel summer heat and trap winter warmth.

Energy Conservation via Retrofitting Existing Structures

The energy conservation practices, although common in new developments, were seldom practiced during construction of older homes. Much of the older housing stock in the City is poorly insulated. Dwellings that currently have R-11 in walls and R-19 in ceilings should be upgraded to R-19 and R-30 wherever possible. Weather stripping and other weather protection measures should be implemented around doors, windows, etc. The following energy conservation measures are eligible improvements under the City's CDBG Housing Rehabilitation Program:

- R-30 Insulation in Ceilings
- R-19 Insulation in Exterior Walls
- Insulation blanketing for water heaters (4) 12" HD Turbine Ventilators on roofs
- Curved blade registers
- Night set-back or automatic clock thermostats
- Water saving fixtures
- Fluorescent lighting

Additionally, the non-profit organization, Campesinos Unidos, Inc., provides weatherization services to eligible low-income participants in the City. The organization's two programs provide services including:

- Minor housing envelope repairs
- Ceiling insulation

- Low-flow showerheads
- Weatherstripping
- Water heater blankets and pipe wrap
- Duct wrap
- Caulking
- Switch and outlet gaskets.

These weatherization programs, funded by Southern California Gas Company and State funds, help reduce energy use in homes and reduce household utility costs.

Water and Sewer Capacities for Residential Developments

The City of Imperial lies in California's Imperial Valley, twelve miles North of the Mexican border. The City was incorporated in 1904. Water and sewer service is provided to over 5,400 accounts, serving a population of approximately 20,000 people who live both in and adjacent to the City.

The revenues from the City's water and sewer utilities are entirely derived from charges for services. The City must establish rates and charges adequate to fund the cost of providing water and wastewater services, including costs for operations and capital improvements needed to keep City's utility infrastructure in safe and reliable operating condition. Rates were last increased in 2013. The City owns a potable water distribution system that serves 5,428 accounts, 2.5% of which are outside of the City limits. It is assumed 100 new connections per year.

Water System

According to the Land Use and Circulation Element Update Environmental Impact Report (EIR) prepared for the city in 2017, the city owns, operates and maintains a system for the treatment, storage and distribution of potable water resources that serves approximately 5,015 (January 2015) water service connections for residences and businesses within the City's service area and Sphere of Influence. The City purchases all of its untreated water from the Imperial Irrigation District (IID), which is conveyed to City facilities via IID's Dahlia Canal via a 24-inch diameter raw water pipeline, and the Newside Canal as a secondary source via 27-inch and 16-inch diameter pipelines.

The City's Water Treatment Plant was completely rebuilt in 1995 and is located to the west of town, just west of B Street at the north end of the airport runway. Raw water from the Dahlia and Newside Canals is diverted into open reservoirs located at the Water Treatment Plant. The City of Imperial Water Treatment Plant currently has a capacity of approximately 7.0 million gallons a day (MGD), which can provide adequate service for the

entire City and proposed development areas. According to the 2017 EIR, the plant is operating at 37% capacity.

Additionally, surplus water is currently being stored at the water treatment site in a 2.0 MG storage ground facility. A remote 2.0 MG ground-level storage tank is also located at the northeast corner of the 13th and O Street intersection. Another 2.0 MG tank was constructed near Cross Road and Fonzi Road.

The water demand projected in the EIR included development pursuant to the City’s General Plan thereby determining there is adequate water supply and filtration capacity to accommodate 1,601 new residential dwellings during the 2021-2029 RHNA period.

Table 21: Monthly Fixed Water Rate

Meter Size	FY 2017-18	FY 2018 -19	FY 2019-20	FY 2020-21	FY 2021-22
1"	\$13.06	\$14.12	\$15.16	\$15.77	\$16.41
1 ½"	16.86	21.72	26.57	27.64	28.75
2"	21.42	30.84	40.24	41.85	43.53
3"	33.59	55.18	76.75	79.82	83.02
4"	47.27	82.54	117.81	122.53	127.44
6"	\$85.29	\$158.58	\$231.87	\$241.15	\$250.80
Quantity Rate per Hundred Cubic Feet (HCF):					
Cubic Feet	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22
All Usage	\$3.36	\$3.57	\$3.75	\$3.90	\$4.06

Source: City of Imperial Website

Wastewater System

The City of Imperial owns, operates, and maintains a wastewater collection and treatment system that services to the City of Imperial, and some isolated areas immediately outside of the City boundary, but within the Sphere of Influence. The Imperial Water Pollution Control Plant (IWPCP) is located at 701 East 14th Street, located just east of the railroad tracks. The existing wastewater treatment plant is located on a 4.68-acre site constructed in the 1940’s and rebuilt in 1995. The City also owns a 15-acre site, northeast of the above- mentioned

site, which is occupied by treatment ponds for emergency use. The most recent expansion was completed in 2004 and has a current treatment capacity of 2.4 million gallons per day (MGD).

According to the Land Use and Circulation Element Update EIR prepared for the city in 2017, the average daily flow to the City of Imperial Wastewater Treatment Plant has varied, with monthly averages ranging from 1.4 million gallons per day (MGD) to 1.6 MGD, demonstrating sufficient capacity to accommodate new growth, including the 1,601 RHNA units.

Table 22: Sewer Rates, FY 2017-18 through FY 2021-22

Annual Rate Per Equivalent Domestic Unit, Single-Family Residential Users					
User Class	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22
Single-Family	\$56.45	\$60.41	\$64.64	\$67.23	\$69.92
Annual Rate Per Equivalent Domestic Unit, Multi-Family Residential Users					
User Class	FY 2017-18	FY 2018-19	FY 2019-20	FY 2020-21	FY 2021-22
Multi-Family	\$48.39	\$51.78	\$55.41	\$57.63	

Source: City of Imperial Website

Table 23: Water Growth Calculations

Metered Water Demand	FY 17-18	FY18-19	FY19-20	FY20-21	FY21-22
Demand (HCF)	1,017,620	1,036,028	1,054,437	1,072,845	1,091,253
Demand (AF)	2,336	2,378	2,421	2,463	2,505
Customers	5,428	5,528	5,628	5,728	5,828
Additional Customers	100	100	100	100	100
Total Customers	5,528	5,628	5,728	5,828	5,928

Metered Water Demand	FY 17-18	FY18-19	FY19-20	FY20-21	FY21-22
Consumption per Customer	184	184	184	184	184
Growth	1.84%	1.81%	1.78%	1.75%	1.72%

Source: City of Imperial Website

Dry Utilities

Subdivision-level improvement requirements are defined in the City’s Municipal Code. These requirements stipulate standards for streets, sidewalks, water and sewer, drainage, curbs and gutters, utility easements, and landscaping. The City has adopted development standards that are typical and are not considered excessive or a constraint on housing development. Such improvements may be considered as a housing cost constraint if they are more costly than what is minimally required to meet health and safety standards or involve requirements that are atypical or exceptionally high relative to other jurisdictions in the vicinity. In Imperial, dry utilities infrastructure impacts the housing costs because this infrastructure is largely privately funded, the cost of construction is likely to be passed on to future homeowners in the area. This makes it less feasible to construct affordable housing in this area. Infrastructure Capacity (Electricity, gas, phone and internet) is available on all sites and sufficient to serve any existing and proposed residential land use changes.

Implementation of the General Plan will increase use of electricity in the Planning Area, particularly the demand for electricity to light, heat, and air condition residential, commercial, and business development. The City has proactively planned for future growth in energy use and demand. One of most notable achievement is the commitment to an Energy Conservation and meeting all mandatory compliance obligations.

The protection of the natural and built environment to ensure sustainable communities and conserve natural resources is one of the foremost challenges facing communities across the country. Rising energy costs, dependence on fossil fuels, and increasing evidence of the adverse impacts of global warming have provoked the need in California and nationwide to improve energy management and resource conservation strategies.

The City of Imperial continues to take a leadership role in developing and implementing resource conservation programs addressing water resources, renewable energy sources, and other efforts toward becoming a green and sustainable city.

Priority for Water and Sewer

Per SB 1087, Chapter 727 (Statute of 2004), upon completion of an amended or adopted housing element, a local government is responsible for immediately distributing a copy of the housing element to area water and sewer providers. In addition, water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Chapter 727 was enacted to improve the effectiveness of the law in facilitating housing development for lower-income families and workers.

The City of Imperial will be meeting with the Imperial Irrigation District within the month of adoption of the Housing Element to create an agreement for water and sewer priority services.

4.0 Housing Resources

Resources available for the development, rehabilitation, and preservation of housing in the City of Imperial are discussed in this chapter. 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.

Future Housing Needs

State law requires each community to play a role in meeting the region's housing needs. A jurisdiction must demonstrate in the Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. This section assesses the adequacy of Imperial's land inventory in meeting future housing needs.

RHNA Requirement

An overview of the Regional Housing Needs Assessment (RHNA) or "fair share" of housing needs for all income groups, as determined by the regional Council of Governments (COG), was provided in the introduction of this Housing Element. RHNA refers to the share of the region's housing growth that has been projected and allocated to a community by income group. In brief, the Southern California Association of Governments (SCAG) is the COG that calculates future housing need based upon projected household growth, plus a certain number of units needed to account for normal and appropriate level of vacancies and the replacement of units lost to conversion or demolition to be built for the projection period between October 15, 2021, and October 15, 2029. In allocating the region's future housing needs to jurisdictions, SCAG considers the following factors:

- Market demand for housing

- Employment Opportunities
- Availability of suitable sites and public facilities
- Commuting patterns
- Type and tenure of housing
- Loss of units in assisted housing developments
- Over-concentration of lower-income households
- Geological and topographical constraints

In March 2021, SCAG adopted a RHNA for its member jurisdictions. A total of 15,993 household units were distributed to the eight (8) local jurisdictions of which approximately 10 percent was allocated to the City of Imperial. Table 24 provides a breakdown of Imperial's share of future regional housing needs, as determined by SCAG, by the following four income categories: Very Low, Low, Moderate and Above Moderate. As indicated by the table, the regional share of housing needs allocated to the City of Imperial is 1,601 new units over the 8-year planning period.

Table 24: 2021-2029 RHNA by Income Category

Income Category (% of County AMI)	Number of Units	Percent
Extremely Low (30% or less)*	352	22%
Very Low (31% to 50%)	352	22%
Low (51 to 80%)	346	22%
Moderate (81% to 120%)	294	18%
Above Moderate (Over 120%)	257	16%
Total	1,601	100.0%

Source: 6th Cycle Regional Housing Needs Assessment Plan, SCAG, 2021. AMI = Area Median Income

Note: * The City has a RHNA allocation of 704 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. The City of Imperial has chosen to assume 50 percent of the very low income as extremely, therefore, the City’s RHNA allocation of 704 very low-income units may be split into 352 extremely low and 352 very low-income units. However, for purposes of identifying adequate sites for the RHNA allocation, State law does not mandate the separate accounting for the extremely low-income category.

Realistic Development Capacity

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to demonstrate that the projected residential development capacity of the sites identified in the housing element can realistically be achieved. Reasonable capacity is calculated for each site based on site types and General Plan and zoning designations (and associated allowed density), environmental constraints, site size, and infrastructure availability. For purposes of this Housing Element site inventory, unless a site is included as a specific plan or planned subdivision, the site inventory utilized the minimum density to calculate the realistic development capacity.

Residential Sites Inventory

This section describes assumptions for how the sites inventory was conducted, particularly as it relates to sites appropriate for lower income households. This includes reasonable capacity, the relationship between affordability and density, and assumed densities (based on General Plan land use designation).

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. The City is committed to identifying sites at appropriate densities as required by law. Government Code section 65583,2(c)(3)(B) allows local governments to use "default" density standards that are "deemed appropriate to accommodate housing for lower-income households." The default density option is not mandated density, but instead provides a streamlined option for local governments to meet the density requirement. No analysis to establish the appropriateness of the default density is required and the California Department of Housing and Community Development (HCD) must accept that density as appropriate in its review. The City of Imperial is classified as a "suburban" jurisdiction and has a lower-income default density standard of 20 dwelling units or more per acre. Therefore, in estimating potential units by income range, it is assumed that:

- A density of 0 to 5 units per acre (primarily for single-family homes) is assumed to facilitate housing in the above moderate-income category;
- A density of 5 to 20 units per acre (primarily for medium density multi-family developments) would facilitate housing in the moderate-income category; and
- A density of 20 or more units per acre (primarily for higher density multi-family developments) would facilitate housing in the very low- and low-income category.

Allocation of Single-Family Zoned Units for Moderate Income Category

Based on the standard distribution of income categories to densities explained above, the moderate-income category is typically assigned to medium density, multi-family

developments with a density range of 5-20 units per acre. However, only a very small percentage of residentially zoned areas in the City of Imperial are zoned with a medium density range, thereby creating a challenge to provide for the 294 units required for the moderate-income category of the RHNA. Therefore, the city has collaborated with the HCD to allow for the following methodology to make the determination that small lots in Residential Single-Family zones (R-1) can be allocated toward the moderate-income household category.

Moderate Income in City of Imperial

For planning and funding purposes HCD has developed the category for moderate income households to include income levels that are 81% to 120% of AMI. As previously discussed, the AMI for the City of Imperial is \$85,163. Therefore, families making from \$68,130 to \$120,195 would fall into the moderate-income category.

Moderate Income Affordable Housing Costs

State and federal guidelines generally state that “affordable housing cost” is determined as not more than 30 percent of gross household income. For moderate income households in the City of Imperial, affordable housing costs for the moderate-income category range from \$20,439 - \$36,058 annually or \$1,703 - \$3,005 monthly.

Single Family Home Costs

Trends in new development in the City of Imperial reveal that a significant portion of single-family homes being built across the city include 2-, 3-, and 4-bedroom homes on small lots ranging from 0.14 to 0.16 acres. These new single-family homes range in size from 1,100 to 1,600 square feet and, based on sales data from the last year provided on Zillow, have been selling for approximately \$300,000 to \$350,000. Estimates of current home values projected by Zillow range from \$360,000 to \$380,000. Below are three examples of recently built single family homes in the R-1 zone that are near vacant land included in the site inventory to demonstrate the current housing trends.

Site Example 1: 2385 Lonita Circle (Victoria Ranch Specific Plan)



Year Built:	2019
Lot Size:	0.15 ac
Home Size:	1,624 sf
Bedroom/Bath:	3/2
Last Sale Price:	\$303,290
Sale Date:	01/31/20
Current Sale Price Estimate:	\$367,500

Site Example 2: 623 Las Lomas Street (Monterrey Park Subdivision)



Year Built:	2019
Lot Size:	0.14
Home Size:	1,566
Bedroom/Bath:	3/2
Last Sale Price:	\$305,705
Sale Date:	07/28/19
Current Sale Price Estimate:	\$372,700

Site Example 3: APN 044-712-029 (Victoria Terraza/Mayfield Subdivision)



Year Built:	2021
Lot Size:	0.14
Home Size:	1,202
Bedroom/Bath:	3/2
Sale Price:	\$350,000 ~
Sale Date:	NA
Current Sale Price Estimate:	NA

Moderate Income Mortgage Estimate

Assessing how much a home would cost monthly allows for the sale price of a home to be compared to the household incomes and determine if the house would be affordable for moderate incomes. Therefore, an assumed mortgage estimate based on a current and typical scenario is utilized to determine an estimated monthly housing cost. As shown in the data of the previous section, the average cost of a 3-bedroom single family house on a 0.14-acre lot is approximately \$360,000. However, for purposes of this analysis, a

conservative home price of \$400,000 is being used. Additionally, it is assumed that a more realistic down payment for a resident of Imperial would be 5%. Therefore, utilizing a California Mortgage Calculator from nerdwallet.com, the monthly mortgage payment for a \$400,000 home is estimated to be \$2,702. The assumptions and breakdown of costs used in the estimate are as follows:

Loan Total	\$380,000
20% Down Payment	\$20,000
Loan Term	30-yr fixed
Principal and Interest	\$2,040
Property Taxes	\$270
Homeowners Insurance	\$233
Private Mortgage Insurance (PMI)	\$158
Monthly Payment	\$2,702

Single Family Home Affordability for Moderate Income Households

As previously determined, the “affordable housing cost” range for moderate income households in the City of Imperial is from \$1,703 - \$3,005 monthly. The estimated mortgage for an average new 3-bedroom single family home that is being built in the R-1 zones of the city is \$2,702. Therefore, small lots that are approximately 0.14 acres in size are assumed to contain single-family homes that are affordable to moderate income households.

Vacant lots contained in the site inventory that are approximately 0.14 acres in size will be included in the moderate-income category for the site inventory. Vacant lots included in the site inventory that are zoned R-1 and are large enough to require to be subdivided are provided a 50/50 split for moderate and above-moderate units. This allocation is realistic because, much like a majority of recent subdivisions in the city, future subdivisions would include a variety of home sizes and, based on the affordability assessment of single-family homes in the city, at least half of all future homes are assumed be within the range of affordable mortgage costs for moderate income households.

Vacant Sites

The site inventory included parcels currently designated for residential use that are currently vacant. Vacant sites are locations with no structures or facilities on the site. For instance, a parking lot is not considered vacant. The city relied upon the city’s existing land use inventory to identify vacant parcels as a first step. Sites identified in the first step were then assessed using aerial photography and staff’s knowledge of the community to confirm vacant status. In a final step, the vacant sites were verified with an in-person site visit and the results were included in the HCD required site inventory form and an accompanying figure depicting the location of the sites was created and are presented in Appendix B. A summary of vacant lands and estimated dwelling units shown in Table 25 and displayed in Appendix B: Site Inventory Table and Map.

Table 25: Vacant Residential Site Capacity

Land Use Designation	Income Category	Min. Density	Acreage	Estimated Dwelling Units
Residential Rural (RR)	Above Moderate	0.5 DU/Acre	129.42	65
Residential Low Density (RL)	Above Moderate	1 DU/Acre	0	0
Residential Single Family (R-1)	Above Moderate	2 DU/Acre	105.96	306
	Moderate	2 DU/Acre	124.35	432
	Low	23 DU/Acre	18.78	440*
Residential Condominium (RC)	Moderate	5 DU/ Acre	0	0
Specific Plan SP	Above Moderate	20 DU/ Acre	44.85	214
	Moderate	20 DU/ Acre	44.85	209
	Low	20 DU/ Acre	8.39	168

Land Use Designation	Income Category	Min. Density	Acreage	Estimated Dwelling Units
Residential Apartment (RA)	Low	20 DU/ Acre	22.01	444
Village Commercial (VC)	Low	0	0	0
Total			498.61	2278

NOTE: Minimum densities were applied to capture the Realistic Unit Capacity to average units per development).

*Planned Morningstar Subdivision.

As required by Government Code section 65583.2(c)(2)(A), (B), and (C), small (less than 0.5 acres) and large (larger than 10 acres) sites designated to accommodate low-income RHNA must provide additional analysis to demonstrate the appropriateness of the site to accommodate housing for lower income households. The sections below profile the small and large parcels included in the city’s site inventory for low-income units.

Large Site Assessment - Morningstar Subdivision

The Morningstar Subdivision is a 177.05 acre planned subdivision located at the north end of the city to the west of Highway 86 and south of Ralph Road. The subdivision is planned for 21.15 acres of commercial, 6.66 acres of parkland, 9.81 acres of open space/water and sewer utilities, 120.65 acres of single family residential and 18.78 acres of multi-family residential as shown in Appendix C: Morningstar Subdivision Phasing Plan.

The 18.78 acres of planned multi-family is contained in Assessor Parcel Number 063-010-080 (72.3 acres) and is proposed to include 440 multi-family units at a density of approximately 23 units per acre. Although the parcel has a current land use and zoning designation for single-family residential, due to the approved subdivision plans and proposed density, the units associated with this portion of the parcel have been allocated toward the low-income RHNA.

To demonstrate the feasibility of lower income development on this site, this analysis will provide information that the Morningstar apartment units will be affordable to lower income and that the lot is likely to be developed.

Low Income in City of Imperial

For planning and funding purposes HCD has developed the category for very low-income households to include income levels that are 31% to 51% of AMI. As previously discussed, the AMI for the City of Imperial is \$85,163. Therefore, families making from \$26,400 to \$42,581 would fall into the very low-income category.

The category for low-income households to include income levels that are 51% to 80% of AMI. Therefore, families making from \$43,433 to \$68,130 would fall into the low-income category.

Low Income Affordable Housing Costs

State and federal guidelines generally state that “affordable housing cost” is determined as not more than 30 percent of gross household income. For very low-income households in the City of Imperial, affordable housing costs range from \$7,920 - \$12,774 annually or \$660 - \$1,064 monthly.

For low-income households in the City of Imperial, affordable housing costs range from \$13,030 - \$20,439 annually or \$1,085 - \$1,703 monthly.

Affordability Example: Morningside Apartments

The Morningside Apartments are located at 498 Treshill Rd at the southern part of the City. According to the leasing office, one-bedroom apartments are currently being leased for \$895 monthly and two-bedroom apartments are leased for \$995 monthly. Therefore, when assessing the affordability apartments at the Morningstar Subdivision, it can be assessed that the apartments to be developed will be affordable to low and very-low-income residents.

Feasibility of Development

Development associated with the Morningstar Subdivision is anticipated to occur within the 6th Cycle timeframe (2021–2029). Recent entitlement actions include the approval of a 5-year extension to the Tentative Map in 2018 and an amendment to the subdivision was approved in 2019 to include 21.15 acres of commercial and therefore indicate a likelihood of near-term development.

Small Site Assessment

HCD guidance provided for analysis of small sites states that parcels smaller than one half acre are considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible.

To meet the RHNA requirements for low-income units with existing vacant sites, the city has included six small parcels within the Residential Apartment (RA) zone that are likely candidates for multi-family developments. The sites selected are vacant sites within the existing built community and are preferred for development to improve the existing community in the high-density areas.

Four of the sites included in the site inventory are 0.16 acres in size and two sites are approximately 0.25 acres. Based on development of similar sized parcels surrounding the vacant lots, it is assumed that the 0.16 acre lots would contain four units and the 0.25 acre lots would contain 6 units.

Table 26: Small Site Summary

Assessor Parcel Number	Size (acres)	Zoning	Minimum Density	Realistic Units
063-152-005	0.16	Residential Apartment	20	4
063-152-006	0.16	Residential Apartment	20	4
063-151-014	0.16	Residential Apartment	20	4
064-202-006	0.16	Residential Apartment	20	4
064-432-018	0.25	Residential Apartment	20	6
064-204-002	0.28	Residential Apartment	20	6
TOTAL UNITS				26

To demonstrate the realistic and feasible development of these sites, below are three examples of multi-family developments on similarly sized parcels in the RA zone near the parcels included in the site inventory.

Small Site Example 1:



- Address: 415 N K Street
- APN: 063-161-011
- Size: 0.16 acres
- Units: 4 bedrooms
- Density: 25 units/acre

Small Site Example 2:



- Address: 303 S Imperial Avenue
- APN: 064-104-023
- Size: 0.17 acres
- Units: 4 bedrooms
- Density: 25 units/acre

Small Site Example 3:



- Address: 211 N K Street
- APN: 063-152-004
- Size: 0.17 acres
- Units: 4 bedrooms
- Density: 25 units/acre

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the City of Imperial, affordable housing costs range from \$7,920 - \$12,774 annually or \$660 - \$1,064 monthly.

For low-income households in the City of Imperial, affordable housing costs range from \$13,030 - \$20,439 annually or \$1,085 - \$1,703 monthly

Small Lot Multi-Family Rental Costs

For purposes of this analysis, it is assumed that the multi-family developments on small lots in Imperial are rented by tenants from the building owner. Research for pricing of available rentals in the Imperial region was conducted on numerous rental websites, including Apartments.com, Rent.com and Zillow.com. According to information gathered from these sources, the rent for one-bedroom apartments or condos ranges from \$514 to \$925 and the average rent is \$691. The research also revealed a range of rents for two-bedroom apartments and condos from \$624 to \$1,270 and the average rent is \$1,032.

Small Site Affordability for Very low- and Low-Income Households

Small vacant sites in the City of Imperial that are zoned RA are suitable candidates for inclusion into the site inventory for low-income units. The above assessment of existing rental costs demonstrates that the current rent levels for one- and two-bedroom units in the area (\$691 and \$1,032, respectively) are within 30 percent of gross household income and, therefore, are considered “affordable” for both low- and very low-income categories.

Accessory Dwelling Units (ADU)

An Accessory Dwelling Unit (ADU) is an additional dwelling unit that could provide affordable housing options for family members, friends, students, the elderly, in-home health care providers, the disabled, and others. An ADU can be located on residentially zoned property that has an existing single-family or multi-family residence. The Zoning Ordinance currently identifies ADUs as “guest dwellings” or “accessory living quarters with no kitchen”. The definition of an ADU as well as the zones allowing ADUs is not currently in compliance with ADU Law (Government Code 65852.2).

The Housing Plan includes a program to update the zoning ordinance to bring this definition and allowable uses into compliance with state law. Between 2013 and 2020, only six building permits were issued for ADUs. Due to the relatively low number of ADUs historically built in the city, they are not counted toward the City’s RHNA.

Adequacy of Sites Inventory in Meeting RHNA

As the sites inventory demonstrates (Table 27), the city has the capacity to accommodate the city’s RHNA obligation plus an additional buffer for moderate and above moderate-income levels that will provide the city with a remaining capacity to address potential net

loss issues over this planning period. Combined, the city has land resources and programs to accommodate the RHNA at all income levels.

Furthermore, annexation of surrounding properties will continue to provide for future residential growth. The City's adopted Land Use Plan ensures that areas immediately adjacent to the incorporated City boundaries can accommodate low, medium, or high-density residential development, via SPA designations, to encourage annexation and facilitate the availability of existing infrastructure to provide essential services, such as potable water and sewer services in an efficient and cost effective manner. The City has a Service Area Plan that would allow for the provision of services and annexation of these adjacent properties. The City has annexed land and demonstrates the availability of adequate sites to accommodate the full RHNA. As a further note there is also adequate acreage designated in the Village Commercial Zone to allow for mixed use or support housing, should it become necessary.

Table 27: Adequacy of Residential Sites Inventory

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	1,050	294	257	1,601
Vacant Sites	1,052	557	597	2,206
Shortfall or Surplus of Sites	2	263	340	605

Resources Available

Financial Resources

Cities have access to a variety of existing and potential funding sources available for development activities for housing to meet the needs of low-and moderate-income groups. The different available and potential financial resources for the preservation and development of housing affordable to these targeted income groups, as well as the provision of housing subsidies for lower and moderate-income residents in Imperial are discussed in this section. This section includes some of the most common funding sources available to support implementation of the City's housing goals and include Federal, State, and Local resources.

Federal Resources

US Department of Housing and Urban Development (HUD)-HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination and transform the way HUD does business.

- **HOME Funds:** The HOME Program was created as a result of the 1990 Cranston-Gonzales National Affordable Housing Act (NAHA). HOME is the largest Federal block grant to State and local governments designed exclusively to create affordable housing for low-income households. HOME funds are awarded annually as formula grants to participating jurisdictions. The program's flexibility allows grantees to use HOME funds for grants, direct loans, loan guarantee or other forms of credit enhancement, or rental assistance or security deposit. The City of Imperial is eligible to apply to HCD for HOME funds. The HOME program was created under the National Affordable Housing Act of 1990. HCD administers the program for non-entitlement jurisdiction. HOME funds can be used for tenant-based rental assistance, property acquisition, site improvements, and other costs related to the provision of affordable housing for low-income families (under 80 percent of median income).
- **Section 8 Housing Choice Voucher Assistance:** The Section 8 program is a federal program that provides rental assistance to very low-income persons in need of affordable housing. The Section 8 Program was authorized by Congress in 1974 and developed by HUD to provide rental subsidies for eligible tenant families (including single persons) residing in newly constructed, rehabilitated and existing rental and cooperative apartment projects. The rents of some of the residential units are subsidized by HUD under the Section 8 New Construction ("New Construction"), Substantial Rehabilitation ("Substantial Rehabilitation") and/or Loan Management Set-Aside ("LMSA") Programs. All such assistance is "project-based", i.e., the subsidy is committed by HUD for the assisted units of a particular Mortgaged Property for a contractually determined period. The Section 8 program offers a voucher that pays the difference between the current fair market rent and what a tenant can afford to pay (e.g., 30 percent of their income). The voucher allows a tenant to choose housing that may cost above the payment standard, but the tenant must pay the extra cost. The Imperial Valley Housing Authority (IVHA) administers the Section 8 Housing Choice Voucher Program for Imperial.
- **Community Development Block Grant (CDBG):** The CDBG Program is administered by HUD. Through this program, the federal government provides

funding to jurisdictions to undertake community development and housing activities. Activities proposed by the jurisdictions must meet the objectives and eligibility criteria of CDBG legislation. The primary CDBG objective is the development of viable urban communities, including decent housing and a suitable living environment, and expanding economic opportunity, principally for persons of low-and moderate income. Each activity must meet one of the three broad national objectives of:

- Benefit to low-and moderate income families;
 - Aid in the prevention of elimination of slums or blight; or
 - Meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community.
- The City will continue to use CDBG funds to assist low- and moderate-income individuals in improving the health and safety conditions of their homes through the rehabilitation of owner-occupied and mobile homes, maintenance of affordable housing through the Mobile Home Assistance Program, and implementation of capital projects that focus on sites for shelters.

USDA Rural Housing Service Programs (RHS)

RHS was formerly the Farmers Home Administration (FmHA). Under Rural Housing Services, communities can access a variety of housing programs to subsidize housing and retain affordability for low and very low-income households. RHS can provide direct loans and guarantee loans for mortgages serviced by others. While RHS is mainly a direct housing mortgage program, its funds can also be used to buy and improve land as well as provide needed facilities such as water and waste disposal systems. Programs include, but are not limited to the following:

- **Section 515 Rural Rental Housing Program-** The Section 515 Rural Rental Housing Program provides rental assistance payments on behalf of lower-income households by 30 percent of their adjusted incomes and makeup the difference to their landlords. Imperial is an eligible locality for Section 515 financing and the program has been well utilized in the City.
- **Section 502 Direct Loan Program-** Under the Direct Loan Program, individuals or families receive direct financial assistance directly from the Housing and Community Facilities Programs in the form of a home loan at an affordable interest rate.

5.0 Review of Past Accomplishments

Section 65588(a) of the Housing Element law requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives, and policies, and the progress in implementing programs for the previous planning period. Therefore, this section evaluates the four-year objectives established for each housing program adopted under the previous Housing Element with the actual accomplishments met during the 2019-2021 planning period.

Table 28: 2019-2021 Housing Program Summary & Objectives (4-Year Period)

Prior & Current Policies	Objective/Actions	Schedule/ Responsible Agency	Accomplishments
<p>Goal#1: Seek a balance of housing opportunities appropriate for the range of jobs available and planned in the city.</p>			
<p>Policy 1. 1. Consider the effects of new employment, particularly in relation to housing demands, when new commercial or industrial development is proposed.</p>	<p>Action 1.1.1: The City will perform a jobs/housing balance analysis and plan that will allow the City to better plan for the appropriate mix of housing based on the types of new employment opportunities as well as to consider when reviewing proposed commercial and industrial developments. The jobs/housing analysis will also include a survey of wages and salaries in the City to determine which housing types should be encouraged.</p>	<p>December 2020 Community Development</p>	<p>The “Jobs/Housing Analysis” was not completed. The City of Imperial was unable to fill a planning position which prevented this action from being met during this planning period and action will continue.</p>
<p>Goal#2: Ensure that the City will provide a range of housing that varies sufficiently in terms of cost, design, size, location and tenure to meet the housing needs of all economic segments of the community at a level no greater than that which can be supported by the infrastructure.</p>			
<p>Policy 2.1. Intergovernmental, public and private cooperation shall be encouraged to achieve an adequate supply of affordable housing.</p>	<p>Action 2.1.1: Continue to establish and adopt objectives indicating the amount of housing needed to correct existing shortages and meet projected growth needs within the City. The goal shall be to meet the City of Imperial's RHNA goals.</p>	<p>Ongoing; Annual Review Community Development Department</p>	<p>The City will continue to aggressively pursue housing needs for the lower income. Action for this item will continue.</p>

	<p>Action 2.1.2: Allow and encourage developers to "piggyback" or file concurrent application (i.e., rezones, tentative tract maps, conditional use permits, variance requests, etc.) if multiple approvals are required, and if consistent with applicable processing requirements. The City will encourage this method of application filing by developing an informative brochure about the development process.</p>	<p>December 2020 Community Development Department</p>	<p>The "Development process" brochure has not been completed. The City of Imperial was unable to fill a planning position which prevented this action from being met during this planning period and action will continue.</p>
	<p>Action 2.1.3: Continue to pursue the annexation of adjacent properties to the north and east of the City.</p>	<p>Ongoing; Annual Review Community Development Department</p>	<p>The City has not been successful in annexing residential parcels during this planning period and action will continue.</p>
	<p>Action 2.1.4: Continue to work with LAFCO on future land the City plans to annex when determining what land will be annexed into the City, staff will ensure that the land includes or has the potential to include a variety of housing types and uses.</p>	<p>Ongoing City Manager, Community Development</p>	<p>The City has not been successful in annexing residential parcels during this planning period and action will continue.</p>
<p>Policy 2.2. Ensure code amendments to development standards and/or processing requirements do not adversely impact housing costs.</p>	<p>Action 2.2.1: Evaluate proposed amendments to the Zoning Code and assess impacts to affordable housing.</p>	<p>Ongoing City Manager, Community Development</p>	<p>This zoning Code Amendment has not been completed due to staff changes. This policy is still consistent with the needs of the city and will continue to be an action item.</p>

	<p>Action 2.2.2: In an effort to promote the development of higher density housing types, the City will amend the Zoning Ordinance to allow up to three stories in the Residential Condominium (RC), Residential Apartment (RA) and for multi-family development in the PUD zone.</p>	<p>December 2020 City Manager, Community Development</p>	<p>This zoning ordinance Amendment has not been completed due to staff changes. This policy is still consistent with the needs of the city and will continue to be an action item.</p>
	<p>Action 2.2.3: The City will amend the Zoning Ordinance to allow up to 20 dwelling units per acre in the Residential Condominium (RC) and up to 30 dwelling units per acre in the Residential Apartment (RA) zone by removing the requirement for Planning Commission and City Council approval for developments to reach these maximum densities in these zones.</p>	<p>December 2020 City Manager, Community Development</p>	<p>This zoning ordinance Amendment has not been completed due to staff changes. This policy is still consistent with the needs of the city and will continue to be an action item.</p>
<p>Policy 2.3. The City will encourage housing suitable to a variety of income levels and household sizes and types in specific plan zones, subdivision review and individual multi-family development review.</p>	<p>Action 2.3.1: Continue to provide opportunities for mixed use development in the Village Commercial (VC) zone, which allows residential/office and/or commercial uses. The City will promote the development of mixed use projects by providing information to developers about the VC zone at the City's Planning and Building counter. The City will work with the developer of mixed-use projects to expedite permit approvals and provide technical assistance in applying for funding sources if necessary.</p>	<p>Ongoing City Manager, Community Development Department,</p>	<p>The City of Imperial was unable to fill a planning position which prevented this action from being met during this planning period and action will continue.</p>

	<p>Action 2.3.2: To facilitate the development of second units as an affordable housing opportunity, the City will amend the Zoning Ordinance to be compliant with Chapter 1062 of the Government Code, which requires development applications for second units to be considered ministerial without discretionary review or a public hearing. The amendment will ensure that second units are allowed uses in all residential zones and require only ministerial review by the Planning Manager without any excessive burdensome conditions of approval.</p>	<p>January 2015 City Manager and Community Development Department</p>	<p>This zoning ordinance Amendment has not been completed due to staff changes. This policy is still consistent with the needs of the city and will continue to be an action item.</p>
<p>Policy 2.4. Increase ownership opportunities for prospective first-time homebuyers through mitigation of land costs and/or financial assistance.</p>	<p>Action 2.4.1: Maintain residential zoning districts and development standards that encourage the development of single-family housing products (i.e., small lot or zero-lot line subdivisions) that are affordable to first-time homebuyers. Continue to participate in the HOME Program as Notices for Funding Available (NOFAs) are released and other California Small Cities Programs.</p>	<p>Ongoing City Manager & Community Development Department</p>	<p>The City will continue to encourage the development of single-family housing products affordable to first-time homebuyers as a continued action item.</p>
	<p>Action 2.4.2: Continue to support development in the PUD and Specific Plan Overlay Districts to ensure flexibility for affordable housing developments.</p>	<p>Ongoing City Manager & Community Development Department</p>	<p>The City will continue to support development in the PUD and Specific Plan Overlay Districts as a continued action item.</p>

	Action 2.4.3: To assist the most disadvantaged groups including the extremely low and very low income and individuals with developmental disabilities, the City will target and reserve resources for these groups through City administered programs such as CDBG Housing Rehabilitation Program and CDBG First lime Homebuyer Program as well as seek partners for the development of new housing for the extremely low and low income including but not limited to Joe Serna Farmworker Program and HOME.	Ongoing City Manager & Community Development Department	The City continue to encourage Program participation as a continued action item.
Policy 2.5. Amend the Residential Zoning ordinance to allow for Mobile Home Parks in all zones that allow for “Single Family Residential” housing and allowing for an increase in density in those zones when the projects being proposed are for affordable housing.	Action 2.5.1: Amend the current Zoning Ordinance to permit Mobile Home Parks in all zones that allow for Single Family Residential with density increases when the projects are for affordable housing.	December 2020	This zoning ordinance amendment has not been completed due to limited staff but will continue to be an action item, but City adheres to State policy.
Goal #3 Continue to promote housing for special needs groups.			
Policy 3.1. Encourage programs that will address the needs for housing and programs for senior citizens, large families, farmworkers, disabled persons, single parent	Action 3.1.1: Work closely with qualified developers of new multi-family housing that includes affordable four- and five-bedroom units.	Ongoing Community Development Department	The City maintains acceptable development standards and will continue to encourage Program participation as a continued action item.

<p>families, extremely low- income and the homeless. The City will offer an expedited review process and technical assistance for projects that include 4 and 5 bedroom units.</p>	<p>Action 3.1.2: The City currently allows farmworker housing units for less than 6 persons with only ministerial review and the City requires a conditional use permit for large scale farmworker housing developments in the RC and RA zones. The City will review and amend the Zoning Ordinance to be compliant with Health and Safety Code Sections 17021.5 and 17021.6, which require group quarters for farmworkers of up to 36 beds and developments of up to 12 units for a single family or household to be allowed without any discretionary review. The City will continue to allow larger-scale developments for farmworkers in the Residential Apartment (RA) and Residential Condominium (RC) zones with a Conditional Use Permit. Farmworker housing developments tend to be unique enough to require review on a case-by-case basis to ensure development criteria is appropriate.</p>	<p>December 2020 Community Development Department</p>	<p>This zoning ordinance amendment has been created and action has been met, but will continue to be an action item.</p>
	<p>Action 3.1.3: Develop a formal reasonable accommodation procedure. The City currently evaluates the need for reasonable accommodations for persons with disabilities on a case-by-case basis. The City will develop a more formalized reasonable accommodation procedure that will provide an administrative exception process in zoning and land use matters for housing for persons with disabilities including the developmentally disabled. The process may include minimal review by the Planning Director and establishment of accommodation measures.</p>	<p>December 2020 City Manager & Community Development Department</p>	<p>The “Reasonable Accommodation” procedures have not been completed. The City of Imperial was unable to fill a planning position which prevented this action from being met during this planning period and action will continue.</p>

	<p>Action 3.1.4: The City will amend its Zoning Ordinance to clarify the definition of single-room occupancy units, which are similar to the current use categories of residential retirement hotels, boarding or rooming houses and guest dwellings. The amendment will also describe specific development standards for these units.</p>	<p>December 2020 City Manager & Community Development Department</p>	<p>This zoning ordinance amendment has not been completed due to limited staff but will continue to be an action item.</p>
	<p>Action 3.1.5: Market the City for diverse senior housing development.</p>	<p>December 2020 Community Development Department, Planning Commission, City Manager</p>	<p>The City maintains acceptable development standards and will continue to encourage diverse senior housing development as a continued action item.</p>
<p>Policy 3.2. Create a “Community Outreach Master Plan” for the City of Imperial using all the material and comments received during the public outreach efforts to have and include in a Community Out Reach Master Plan, to be used for the next Planning Cycle to create goals for the City so that we can monitor that we are meeting and being consistent with the vision of the citizens of Imperial.</p>	<p>Action 3.2.1: Create a “Community Outreach Monitoring Plan” for the Housing Element Goals for next Planning Cycle to ensure proper outreach efforts are attained based on the direction of the City Council and State Guidelines.</p>	<p>December 2020 Community Development Department, City Manager</p>	<p>The “Community Outreach Monitoring Plan” was not completed. The City of Imperial was unable to fill a planning position which prevented this action from being met during this planning period. However, the City will make a diligent effort to achieve public participation in the development of the housing element.</p>

<p>Policy 3.3. To encourage the development of transitional and supportive housing by reviewing and amending the zoning ordinance for “Transitional and Supportive Housing”.</p>	<p>Action 3.3.1: The zoning ordinance will be amended to permit transitional and supportive housing as a residential use, subject only to those regulations that apply to other residential dwellings of the same type in the same zone. In addition, definitions of “transitional housing” and “supportive housing” will be added to the zoning ordinance consistent with Government Code Section 65582.</p>	<p>Within one year of adoption of the housing element or by 2020 Community Development Department</p>	<p>This zoning ordinance amendment has not been completed due to limited staff but will continue to be an action item.</p>
<p>Goal#4: Accommodate housing that is affordable to very low-, low- and moderate-income households.</p>			
<p>Policy 4.1. The City will facilitate and assist developers of low-and-moderate income housing.</p>	<p>Action 4.1.1. The City will develop a density bonus ordinance in compliance with Government Code Section 65915 and to ensure its successful implementation. The program will allow developers to build at a density higher than the maximum density of a zone when they produce units affordable to very low-, low- or moderate-income persons.</p>	<p>December 2020 Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
	<p>Action 4.1.2. Evaluate the feasibility of an affordable housing fee program that will fund an affordable housing trust fund to support a variety of housing needs in the City.</p>	<p>December 2020 Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
	<p>Action 4.1.3. Encourage developers to employ innovative or alternative construction methods to reduce housing costs and increase housing supply by providing incentives such as density bonus units, fast tracking, etc.</p>	<p>Ongoing Community Development Department</p>	<p>The City maintains acceptable development standards and will continue to encourage Program participation as a continued action item.</p>

	<p>Action 4.1.4. The City will continue to assist developers and sponsors of low- and moderate-income housing through the following incentives as feasible: 1) Land write-downs using Program Income or other dedicated funds; 2) Giving consideration to low- and moderate-income housing development in the processing of applications; and 3) Exploring all the available funding sources for assistance such as CDBG, HCD, CHFA, HUD and USDA.</p>	<p>Ongoing; Annually Community Development Department</p>	<p>Due to limited planning staff, incentives have not been created. The action has not been met and will continue to be an action item.</p>
<p>Policy 4.2. Preserve housing units at risk of losing affordability status for units that are subsidized with federal, state, or local funds.</p>	<p>Action 4.2.1. Develop an affordable Housing Conversion Ordinance that requires, at least one year prior to the conversion date, for the owner to provide written notification to residents of the expected date of loan prepayment or pay-off, at which time the owner will no longer be restricted in the level of rent that can be charged. The notice will also contain an estimate of rent increases at the time that rental restrictions no longer apply. Residents moving into a housing development during this one-year period must also be notified in writing of the pending conversion prior to signing a rental agreement. Property owners shall further provide relocation assistance to those low- income households who are unable to afford rent increases.</p>	<p>December 2020 Community Development Department</p>	<p>This zoning ordinance amendment has not been completed due to limited staff but will continue to be an action item.</p>

Goal#5: Pursue public and private resources available to promote diverse housing opportunities, and particularly to assist in the creation of affordable housing.			
<p>Policy 5.1. Support the continuation and expansion of federal housing assistance programs for extremely low-, very low-, low- and moderate-income households. Provide information regarding housing assistance to qualified extremely low-, very low-, low- and moderate-income households. Information on all housing assistance programs will be readily available at the front counter of the City Planning and Building Department, Library and Senior Center. The City will also post this information on its website</p>	<p>Action 5.1.1. Continue to allocate HOME and CDBG funds to direct housing-related programs.</p>	<p>December 2020; Annually City Manager and Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
	<p>Action 5.1.2. Encourage local builders to provide sufficient housing stock for participants in first- time homebuyer and other "below market rate" home purchase programs.</p>	<p>Ongoing Community Development Department</p>	<p>The City maintains acceptable development standards and will continue to encourage Program participation as a continued action item.</p>
	<p>Action 5.1.3. (1) Continue to conduct an annual housing needs workshop for the City Council to determine the best use of grant money (HOME/CDBG). (2) Continue to update the grant calendar of limits and deadlines for applying for grant funds from the State of California and other sources.</p>	<p>Annual Review Community Development and City Manager Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
	<p>Action 5.1.4. Examine creative ways to subsidize public infrastructure or reduce overall costs of public facilities in an effort to eliminate Community Facility Districts and discourage developers from the establishment of Community Facility Districts in an effort to encourage affordable home ownership opportunities to all income levels.</p>	<p>Annual Review Community Development and City Manager</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>

<p>Policy 5.2. Implement rehabilitation loan and grant programs for low- and moderate-income homeowners and rental property landlords through the CDBG and/or HOME programs to encourage full utilization of the City’s existing housing stock as long as funds are available.</p>	<p>Action 5.2.1. Continue to annually determine which grant applications should be submitted to the State and other granting agencies.</p>	<p>Annually City Manager and Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
<p>Policy 5.3. Encourage the private sector to take a role in the assistance to low-income households to rehabilitate substandard or deteriorated units.</p>	<p>Action 5.3.1. Work with developers to improve substandard rental units by providing incentives for lower- income units.</p>	<p>Annually Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>
<p>Policy 5.4. Explore ways to finance, staff and support local community revitalization and housing rehabilitation programs, senior citizens home repair, energy conservation, weatherization and self-help preventive maintenance programs.</p>	<p>Action 5.4.1. Continue to support Commissioner and staff efforts to expand upon their housing knowledge base financially and otherwise. Set aside funds for staff to be involved in classes, conferences and training opportunities that will ensure that they are up-to-date on the latest housing and community development trends, strategies and funding sources. Also maintaining membership and remain on mailing lists for all relevant housing related state departments and organizations.</p>	<p>Annually and Ongoing Community Development Department and City Manager</p>	<p>This action has been incorporated to various projects that the City was able to help with grant money and street dedications for projects to assist with parking requirements. Staff continues to participate in both local and nationwide conferences to gain knowledge in order to better serve the community of the City of Imperial.</p> <p>This action is still consistent with the city and will continue to be implemented for the remainder of the planning period.</p>

Goal#6: Initiate all reasonable efforts to preserve, conserve and enhance the quality of existing dwelling units and residential neighborhoods to ensure full utilization of the City's existing housing resources for as long as physically and economically feasible.			
Policy 6.1. Maintain and conserve the existing structurally sound housing supply in a safe and serviceable condition while eliminating housing deficiencies and preventing further deterioration.	Action 6.1.1. Continue to provide loans from the CDBG-funded Revolving Loan Account (RLA) to homeowners in existing owner-occupied residences within the City to use for the rehabilitation of their property. The City expects to be able to assist approximately ten (10) households through the end of the planning period.	Ongoing City Manager and Community Development Department	This action item will continue as funding becomes available. The grant money that was dedicated to City was not used during the 2014-2018 planning period because there were not any applicants who qualified for funding.
	Action 6.1.2. Continue to enforce existing regulations regarding derelict or abandoned vehicles, outdoor storage, and substandard or illegal buildings.	Ongoing Community Development Department	This action will be continued into the next planning period. The City of Imperial hired a “full-time” Code Enforcement Officer during July of 2018. This will continue to be an action item.
	Action 6.1.3. Give code enforcement a high priority and provide adequate funding and staffing to support code enforcement programs.	Annual Review Community Development Department	This action has been met with the creation and hiring of a Code Enforcement Officer during July 2018, although the action will be continued for potentially more staffing opportunities.
Policy 6.2. In the development of public projects, require an analysis of potential displacement of existing residences with an emphasis on minimizing displacement.	Action 6.2.1. Continue to periodically review the City's Relocation Plan.	Annual Review City Manager & Community Development Department	Due to limited planning staff, action has not been met and will continue to be an action item.

Goal#7: Pursue sustainable development and energy efficiency for new residential development and existing housing stock.			
<p>Policy 7.1. Require energy efficiency in the design and construction of housing developments through implementation of the State Energy Conservation Standards (Title 24). The long-term economic and environmental benefits of energy efficiency shall be weighed against any increased initial costs of energy saving measures. Encourage sustainable development by reducing energy use.</p>	<p>Action 7.1.1. Continue to consider fee reductions, expedited permit processing, or other incentives for new construction that exceeds Title 24 energy efficiency standards by ten percent or more and/or incorporate the use of renewable (non-fossil-fuel) energy.</p>	<p>Ongoing Community Development Department</p>	<p>Due to limited planning staff, action has not been met and will continue to be an action item.</p>

In December 2018, the City’s Housing Element was last updated with the goals and programs listed in Table 28, above. As described in the table, many of the actions were not accomplished. Although the cumulative effect of the programs would likely result in the effective deliverance of housing services and assistance, a lack of staffing resulting in program actions being delayed but continued. Program 2 of the Housing Plan seeks to resolve the staffing issue and assist in implementing the actions to provide improved housing services and assistance.

6.0 Housing Plan

The Housing Plan identifies the City’s housing goals, policies, and implementing programs. The overall strategy is to present a balanced and diverse array of policies that mitigate some of the challenges the City faces and effectively address the identified housing needs for the 2021-2029 planning period. The goals and policies of the Housing Element were organized into concise goal and policy directives.

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GOALS AND POLICIES

1. HOUSING OPPORTUNITIES

The City of Imperial encourages the production of new housing units that offer a wide range of housing types to ensure that an adequate supply is available to meet the existing and future needs of all sectors of the community. A balanced inventory of housing in terms of unit type, cost, and style will allow the City to fulfill a variety of housing needs.

Goal 1.0: Encourage a wide range of housing by location, type of unit, and price to meet the existing and future needs of Imperial residents.

- Policy 1.1: Seek funding to acquire additional staff specifically dedicated to implement the policies, goals, and programs established in this and previous housing element cycles.
- Policy 1.2: Seek to provide a variety of residential development opportunities to meet the City’s share of regional housing needs through facilitating and assisting developers of low-and moderate-income housing.
- Policy 1.3: Seek to attain maximum leverage of City resources with those of private and non-profit entities on affordable housing projects.
- Policy 1.4: Encourage housing constructed expressly for lower and moderate income households (including extremely low income households) be located throughout the City.

- Policy 1.5: Require the design of affordable housing developments be compatible with the surrounding neighborhood, and not appear any different than market-rate developments.
- Policy 1.6: Encourage the use of energy and water conservation techniques in new development.
- Policy 1.7: Ensure code amendments to development standards and/or processing requirements do not adversely impact housing costs.

2. REMOVAL OF CONSTRAINTS ON HOUSING DEVELOPMENT

Governmental policies and market conditions can constrain housing development and affect affordability. While the City has little influence on market conditions, certain governmental regulations affecting the maintenance, improvement, and development of housing can be minimized to facilitate new construction.

Goal 2.0: Remove Governmental Constraints on Housing Development.

- Policy 2.1: Periodically review City regulations, ordinances, departmental processing procedures and fees related to the rehabilitation and/or construction of housing units to ensure they do not unduly constrain housing development.
- Policy 2.2: Review specific project development where additional fees can be waived and/or amended such as ADU's through an ADU Fee Waiver Program.

3. MAINTENANCE AND PRESERVATION OF HOUSING

The City's goal is to preserve the existing housing stock and to avoid a degree of physical decline that will require a larger rehabilitation effort to restore quality and value in the future. In addition, it is important to conserve affordable housing units in the community to maintain adequate housing opportunities for all residents.

Goal 3.0: Maintain and Preserve the City's housing supply through various funding sources, implementation programs, and advisory bodies.

- Policy 3.1: Implement neighborhood revitalization strategies to focus efforts in improving city services and infrastructure that supports the City's housing supply.
- Policy 3.2: Continue to identify new funding opportunities to help provide financial housing assistance to lower income communities.
- Policy 3.3: Continue to utilize code enforcement to bring substandard units into compliance with City codes and to improve overall housing conditions in Imperial.

- Policy 3.4: Implement efficiency measures and standards pertaining to energy and water in new housing development in the City.
- Policy 3.5: Ensure the replacement of existing lower-income units that are identified for potential redevelopment.
- Policy 3.6: Implement rehabilitation loan and grant programs for low- and moderate-income homeowners and rental property landlords through the CDBG and/or HOME programs to encourage full utilization of the City’s existing housing stock as long as funds are available.
- Policy 3.7: Maintain and conserve the existing structurally sound housing supply in a safe and serviceable condition while eliminating housing deficiencies and preventing further deterioration.

4. HOUSING FOR THE VULNERABLE

The City of Imperial seeks to expand and identify new funding sources and opportunities to provide housing for vulnerable communities. Vulnerable communities include low-income, minority groups, the elderly, persons with disabilities, and homeless. Identifying and targeting vulnerable communities in the City ensures the City’s housing market is inclusive and equitable.

Goal 4.0: Provide supportive housing and services to homeless populations and other vulnerable populations with special needs.

- Policy 4.1: Coordinate with the Regional Task Force on Homelessness of Imperial County, and other agencies, for needs assessment and resource allocation.
- Policy 4.2: Offer housing assistance to homeless individuals using a continuum of care model to address issues related to homelessness (e.g. emergency, transitional, and permanent housing linked with case management, employment, health and mental health, substance abuse, etc.).
- Policy 4.3: Continue to facilitate the development of housing for persons with disabilities and other special needs through affordable housing development.
- Policy 4.4: Monitor policies, standards, and regulations in regard to housing for the homeless on a continual basis through the Homeless Prevention Program.
- Policy 4.5: Further educate and expand safe and healthy housing to all vulnerable groups and help foster the City’s commitment to environmental justice.

Policy 4.6: Encourage the development of transitional and supportive housing by reviewing and amending the zoning ordinance for “Transitional and Supportive Housing”.

5. FAIR HOUSING PRACTICES

In order to make adequate provision for the housing needs of all economic segments of the community, the City must ensure equal and fair housing opportunities are available to all residents.

Goal 5.0: Promote Fair Housing Practices

Policy 5.1: Provide fair housing services to Imperial residents, and assure that residents are aware of their rights and responsibilities regarding fair housing.

Policy 5.2: Implement the action items identified in the Regional Analysis of Impediments to Fair Housing Choice (AI) to further access to fair housing in Imperial.

HOUSING PROGRAMS

1. HOUSING OPPORTUNITIES

Program 1: Residential Sites Inventory

Through Zoning and General Plan designations, the City maintains a residential sites inventory that is adequate to accommodate the City’s remaining share of regional housing needs. The City’s Regional Housing Needs Assessment (RHNA) is 1,601 units (704 units for very low income, 346 units for low income, 294 units for moderate income, and 257 units for above moderate income).

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Maintain an ongoing inventory of multi-family residential and mixed use sites and provide updated information on sites on City website (by October 2023);
- Maintain an ongoing inventory of City-owned properties and other surplus sites owned by other public agencies that may be appropriate for residential uses (by October 2023);

- Perform a Housing Conditions Survey of the City’s existing housing stock by October 2023 to identify the need to rehabilitate or redevelop aging homes with the focus to identify opportunities to increase density to better meet the City’s RHNA;
- Promote development incentives (higher density, reduced parking, and other development standards) to developers active in the region (ongoing);
- Research Census data related to Vacancy Rates to clarify discrepancies in local data versus regional data to determine whether actions would be required to resolve a vacancy issue (by October 2023);
- Monitor the consumption of residential acreage to ensure an adequate inventory is available (ongoing); and
- Investigate tracking rents for accessory dwelling units (ongoing).

Program 2: Residential Sites Monitoring Program

In 2017, Senate Bill 166 (SB 166), otherwise known as “no net loss”, was passed to ensure that cities and counties “identify and make available” additional adequate sites if a housing project is approved at a lower density or with fewer units by income category than what is identified in the Housing Element. In conjunction with Program 1 Residential Sites Inventory, the City will further implement a monitoring program that evaluates the current capacity of housing sites for all income levels throughout the duration of the planning period. The City commits to implementing the policies and programs established in this housing element and to internally tracking the City’s available housing sites through its internal database to ensure the City remains on track towards satisfying its RHNA target.

Should an approval of development result in a shortfall of sites to accommodate the City’s remaining RHNA requirements (for lower-, moderate-, or above moderate-income households), the City will identify and, if necessary, rezone sufficient sites within 180 days to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City will obtain funding by October 2023 to acquire additional staff specifically dedicated overseeing the implementation of policies and programs established in this housing element as well as unmet goals from previous housing element cycles;
- The City will maintain an updated inventory of residential housing developments that have been submitted, approved, and denied (ongoing);

- The City will change the General Plan and Zoning designations of properties listed in Appendix B, if needed, to address any shortfall of sites to accommodate the City’s remaining RHNA requirements (October 2024);
- The City will actively promote sites available for lower- and moderate- income housing development to potential developers, private and non- profit organizations, and other interested persons and organizations through the creation of a Development Outreach Committee, or similar City-run group (ongoing);
- The City will amend the Zoning Ordinance by October 2023 to allow, by right, a mix of dwelling types and sizes, specifically missing middle housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) within lower density city residential designations; and
- The City will annually monitor the City’s remaining housing capacity to ensure compliance with SB 166.

Program 3: Affordable Housing Development

Consistent with state law (Government Code sections 65915 through 65918), the City will develop a residential density bonus ordinance as a means of encouraging affordable housing development. In exchange for setting aside a portion of the development as units affordable to lower- and moderate-income households, the city will grant a density bonus over the otherwise allowed maximum density, and up to four regulatory incentives or concessions.

In addition, the City can utilize CDBG and HOME funds to write-down the cost of land for the development of extremely low-, very low-, low-, and moderate-income housing. The intent of this program is to reduce land costs to the point where it becomes economically feasible for the private developer to build units affordable to low- and moderate-income households. As part of the land write-down program, the City may also assist in acquiring and assembling property, subsidizing on-site and off-site improvements, and assisting in relocation activities as well as clearing and demolition.

The City continues to seek the development of affordable housing to address special needs populations (seniors, severely mentally ill, physically disabled, eldercare, large families, and children transitioning from foster care). The City is committed to maintaining and monitoring housing conditions amongst vulnerable and extremely low-, very low-, and low-income populations. Lower-income communities along with the elderly and persons with disabilities are disproportionately burdened with poorer housing conditions. Imperial will continue to seek new funding opportunities as well as new partnerships to greater improve housing conditions. The City will work to identify and partner with advocacy groups to expand existing resources and help further improve housing conditions amongst the

vulnerable and low-income communities and the need for rehabilitation assistance increases as the housing stock ages.

Funding: General Fund CDBG and HOME

Responsible Agency: Community Development

Objectives and Timeframe:

- Continue to utilize CDBG and HOME funds to expand affordable housing projects that target and address vulnerable and special needs populations;
- Annually seek additional funding sources and identify new partnerships to greater expand resources in the City;
- Amend Municipal Code Chapter to incorporate State density bonus law as part of the General Plan and Zoning Code update project, by October 2023; and
- Investigate funding opportunities to provide rehabilitation services to homeowners and people amongst the vulnerable and low-income communities. Priority will be given to repair and rehabilitate housing identified by the city’s Building Division as being substandard or deteriorating, and which houses lower-income, and in some cases, moderate-income households.
- Maintain contact information for affordable housing developers special needs service providers for the purposes of soliciting their involvement in development projects in Imperial.
- Participate with affordable and special needs housing developers to review available federal and State financing subsidies and apply as feasible on an annual basis.
- Assist and support developers of housing for lower income households, especially housing for extremely low income households and the disabled (including the developmentally disabled), with site identification, supporting applications, conducting pre-application meetings, assisting with design and site requirements, and providing regulatory incentives and concessions.

Program 4: Lot Consolidation

To expand opportunities for additional affordable housing, the city will encourage the consolidation of small parcels in order to facilitate larger-scale developments that are compatible with existing neighborhoods.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City will continue to make available an inventory of vacant and nonvacant properties to interested developers;
- The City will identify sites where potential consolidation can happen based on current site usage and ownership;
- The City will market infill and redevelopment opportunities throughout the City and meet with developers to identify and discuss potential project sites on an on-going basis, and;
- The City will offer incentives for lot consolidation when minimum standards are met by October 2023. Incentives could include: reduced development fees, increased allowable density, decreased parking ratio requirements, modification to commercial FAR in mixed-use zones, reduced setbacks, and increased lot coverage and height allowance.

2. REMOVAL OF CONSTRAINTS ON HOUSING DEVELOPMENT

Program 5: ADU Update and Monitoring Program

In recent years, multiple bills have added requirements for local governments related to ADU ordinances. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days, remove lot size requirements and replacement parking space requirements and require local jurisdictions to permit junior ADUs. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, prohibited fees on units of less than 750 square feet, and permitted ADUs at existing multi-family developments. Such provisions have not yet been fully amended in the Zoning Ordinance and are necessary to be changed to comply with state law. This program aims to annually monitor provisions made to ADU legislation and amend the City’s Zoning Ordinance as necessary to ensure compliance with state law.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Respond in a timely manner to update the Imperial Zoning Ordinance/Municipal Code to integrate changes in State housing law. Specifically, amend the zoning

ordinance to comply with Government Code section 65852.2 (ADU law), by October 2023, to update the City’s definition of an ADU as well as allow for ADUs in all zones allowing residential uses, not just residential zones;

- Annually monitor ADU production and affordability on a bi-annual basis; and,
- Perform a review of ADU trends every two years and commit to adjustments if assumptions are not met. If the City is not meeting ADU goals, consider implementing additional action(s) every six months depending on the severity of the gap. Additional actions could include consideration of public outreach efforts, ADU incentives, and/or rezoning to bridge the gap.

Program 6: ADU Fee Waiver Program

Under this program the City will encourage the development of ADU’s by amending the City’s Municipal Code to provide for certain fees to be waived in the development of ADU’s. Code amendments could include criteria such as:

- The ADU is occupied by an eligible household (see below) during the first ten years following the issuance of the certificate of occupancy for the unit; and
- The owner of the property has executed and recorded a regulatory agreement, in a form approved by the City Attorney, to assure compliance with this paragraph, and such rules as may be necessary so that the unit is eligible to be counted towards the City’s Regional Housing Needs Assessment. An eligible household shall consist of either:
 - a lower income household which has a gross income which does not exceed 80 percent of the Imperial County median, adjusted by household size; or
 - a family member or caregiver providing regular care to an owner or occupant of the primary unit in need of that care.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Amend the Zoning Ordinance, by October 2023, to waive development impact fees for ADU’s under certain conditions that must be met and review on an annual basis.

Program 7: Zoning Ordinance

The Imperial Zoning Ordinance is continuously updated to address changes among a range of issues and State/Federal laws. The City will continue to monitor its policies, standards,

and regulations to ensure they work to facilitate residential and mixed use development in the community. The City will also revisit its parking regulations.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City will continue to monitor the City's Zoning Ordinance to ensure standards do not unduly constrain residential and mixed use development;
- The City will review parking regulations by October 2023, and amend if necessary, to be consistent with regional trends and State regulations, especially for projects in close vicinity to transit centers so as to help reduce overall project costs;
- The City will amend the zoning ordinance to reflect the Low Barrier Navigation Centers requirements per Government Code section 65660, by October 2023. Specifically in the amendment, as applicable to State Law, to allow the use to be by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, and;
- Update the zoning ordinance to allow housing for agricultural workers as defined by the California Employee Housing Act. Specifically, the update will include allow for housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household be considered an agricultural land use, and permitted in the same way as other agricultural uses.

Program 8: Development Fees

The City charges various fees and assessments to cover the cost of processing permits and providing certain services and utilities. These fees are not considered excessive compared to surrounding communities. In addition to City fees charged at the time building permits are issued, developers are required to pay school impact and water connection fees.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Annually monitor all residential development fees to assess their impact on housing costs, and if feasible and appropriate, offer financial assistance to affordable housing projects to offset the cost impact of development fees.

Program 9: Expedited Project Review

The City continues to improve the efficiency of the development review process. As a response to a housing shortage in the State of California, Senate Bill 330 (SB 330) was passed to restrict local rules that limit housing production. SB 330 helps strengthen the Permit Streamlining Act, by creating a more efficient two- step application process. In conformance with Government Code Section 65940.1 (SB 1483), the City has all schedule of fees, application forms, Zoning Ordinance/Municipal Code, and other relevant information publicly accessible on the City’s website. The City will continue to find ways to make the development process more efficient to uphold SB 330, by further streamlining the permit process and directly coordinating with developers to ensure a timely application and development process.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- As needed, the City will continue to prioritize processing for affordable housing and multi-family projects,
- In accordance with the State Streamlining Review Act, the City will attempt to complete the permitting process for residential projects within 180 days;
- The City will annually assess the efficiency of the City’s permit streamlining process and continue to implement best practices with efficient project review procedures, and
- The City will post all zoning and development standards for each parcel on the jurisdiction’s website pursuant to Government Code section 65940.1, subdivision (a)(1) by October 2023.

Program 10: Flexibility in Development Standards

The City, in its review of development applications, may recommend waiving or modifying certain development standards, or propose changes to the Development Code to encourage the development of low- and moderate-income housing. The City offers offsets to assist in the development of affordable housing citywide. Offsets include concessions or assistance including, but not limited to, direct financial assistance, density increases, standards modifications, or any other financial, land use, or regulatory concession that would result in an identifiable cost reduction.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City will monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints and enhance the feasibility of affordable housing, while maintaining the quality of housing, and;
- The City will address and remove/mitigate identified constraints pertaining to building height and parking requirements in multifamily zones. As part of the Zoning Code update associated with the General Plan update effort, by October 2023, analyze and implement a sliding scale, or similar standard, for parking requirements for residential projects based on unit type as well as consider revising the Development Code to accommodate three stories housing developments for RC and RA zones.

3. MAINTENANCE AND PRESERVATION OF HOUSING

Program 11: Sustainable Building Program

The City is committed to ensuring that new development complies with the State Energy Efficiency and Green Building Standards and the Imperial Valley Regional Climate Action Plan (RCAP). The City is currently participating in the RCAP which is currently in draft review with plans to be finalized in the summer of 2021. The RCAP is a long-range plan to reduce GHG emissions from municipal operations and community activities within Imperial Valley and the City and prepare for the anticipated effects of climate change. The RCAP will set forth goals and policies to increase energy efficiency and water conservation within residential developments. As part of the California Air Resources Board (CARB) California 2017 Climate Change Scoping Plan (2017 Scoping Plan) , the collective Cities in the region have committed to reducing GHG emissions 40 percent below year 1990 levels by 2030, and 80 percent below year 1990 levels by 2050. The City will continue to expand green building policies in the City through further implementation of RCAP and other state and local policies.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Continue to enforce the California Energy Code through the development review process;

- Collaborate with the Imperial Irrigation District (IID) to provide and promote energy efficiency and conservation education, training, rebates, and incentives to Imperial residents, businesses, and employees by October 2023; and,
- Provide information on the City’s website related to steps that residents and businesses can take to conserve energy and increase efficiency, including links to energy efficiency and conservation programs and websites, such as Energy Upgrade California and Flex Your Power.

4. HOUSING FOR THE VULNERABLE

Program 12: Housing for Special Needs Populations

The Imperial Zoning Ordinance is continuously updated to address a wide range of issues and State and Federal law. However, the City will continue to monitor its policies, standards, and regulations to ensure that they do not unduly impact persons with special needs. The City will also facilitate the development of housing for persons with disabilities and other special needs through incentives for affordable housing development.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Continue to monitor policies, standards, and regulations to ensure that they do not unduly impact persons with special needs;
- To assist the most disadvantaged groups including the extremely low and very low income and individuals with developmental disabilities, the City will continue to target and reserve resources for these groups through City administered programs such as CDBG Housing Rehabilitation Program and CDBG First lime Homebuyer Program as well as seek partners for the development of new housing for the extremely low and low income including but not limited to Joe Serna Farmworker Program and HOME;
- Amend the Municipal Code to incorporate all changes to State legislation pertaining to special needs populations as part of the General Plan and Zoning Code update project, by October 2023; and
- Facilitate the development of housing for persons with disabilities and other special needs through incentives for affordable housing development (October 2024).

Program 13: Sites Used in Previous Planning Periods Housing Elements

In 2017, AB 879 and AB1397 were passed requiring additional analysis and justification of the sites included in the sites inventory of the city’s Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Some sites within this Housing Element were used in previous cycles and this program is included to address the by-right approval requirement. Per AB 1397, the use by right of these sites during the planning period is restricted to developments in which at least 20 percent of the units in the development are affordable to lower income households, provided that these sites have sufficient water, sewer, and other dry utilities available and accessible or that they are included in an existing general plan program or other mandatory program or plan to secure sufficient water, sewer, dry utilities supply to support housing development.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City shall rezone or amend its Zoning Code by October 2023 to allow by- right approval for housing developments proposed for non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements, provided that the proposed housing development consists of at least 20 percent lower income and affordable housing units.

Program 14: Safe and Healthy Housing Program

The City of Imperial is committed to reducing the barriers of housing to vulnerable populations due to environmental hazards. Communities of color and lower-income communities are disproportionately burdened with poor housing conditions due to a variety of environmental threats and hazards. Under California Government Code 65040, environmental justice is designed as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” The City is committed to expanding safe and healthy housing opportunities for people of all groups through the continuous expansion of environmental justice policies, conducting thorough environmental review of all housing developments, and creating partnerships with environmental justice agencies and advocates such as the California Environmental Justice Alliance.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Annually monitor policies, standards, and regulations regarding environmental justice in the city; and
- Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people.

Program 15: Supportive and Transitional Housing Program

In 2018, Assembly Bill 2162 (AB 2162) was passed which requires that supportive housing be a use by right in zones where multi-family and mixed uses are permitted including nonresidential zones permitting multifamily uses. Additionally, AB 2162 prohibits local governments from imposing any minimum parking requirements for units occupied by supportive housing residents if the development is located within ½ mile of a public transit stop. The City will amend its Zoning Ordinance to reflect AB 2162 and continues to seek new supportive housing opportunities through further analysis of their Residential Sites Inventory. The City of Imperial is committed to expanding both supportive and transitional housing opportunities for vulnerable communities that rely on such services and will prioritizing these housing developments near transit centers to provide easier access to City services for supportive and transitional housing residents. Furthermore, the City is committed to fostering relationships with supportive housing advocacy partners to further identify potential opportunities for supportive housing in the City.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- The City will monitor policies, standards, and regulations in regards to supportive and transitional housing developments for vulnerable groups in the City;
- The City will nurture ongoing partnerships that help educate and execute the development of supportive and transitional housing;
- The City will amend the zoning ordinance to reflect AB 2162, by October 2023. Specifically in the amendment, as applicable to State Law, to include provisions for facilities serving more than six people to be allowed with a conditional use permit in the R-1 zone and by right for the following zones: R-1, RC, RA, VC and C-2, and;
- The City will create and adopt a Reasonable Accommodation Ordinance, by October 2023, to establish a written procedure demonstrating how the City complies with State Law. The ordinance shall include a process for how the City will review and decide applications for reasonable accommodation as provided by the federal Fair

Housing Amendments Act and California’s Fair Employment and Housing Act to allow reasonable remedy from zoning standards for individuals with physical or mental impairment (i.e. Administrative Committee).

Program 16: Alternative Housing

Under this program, the City will continue to support alternative types of housing, such as multifamily units, single-room occupancy units, and managed living units or “micro-units,” to accommodate extremely-low- income households.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Continue to annually monitor underutilized properties and sites that have a potential for alternative housing options and offer the information to interested developers on an on-going basis;
- Rezone underutilized commercial, office, and or industrial space, as appropriate, to facilitate use for alternative housing types. This will be done with the RHNA updates on or before October 2023 and then annually as opportunities arise;
- Develop, as part of a zoning ordinance update, definitions for alternative housing types, including single-room occupancy units and create specific development standards for these units by October 2023;
- Review and amend zoning by October 2023 and utilize the city’s regulatory powers (e.g., land use and fees) to create incentives to encourage development of alternative housing;
- Encourage innovative housing structures, such as micro-unit housing and new shared and intergenerational housing models to help meet the housing needs of aging adults, students, and lower-income individuals citywide. This will be accomplished on an on-going basis; and
- Review and amend the Imperial Zoning Ordinance by October 2023 to adjust definitions and allowances of uses for Employee Housing, Residential care facilities, Group Homes and/or Boardinghouses to be consistent with California Law, including but not limited to Health and Safety Code Sections 17021.5 and 17021.6.

Program 17: Preservation of At-Risk Housing

Under this program, the City will continue to support the preservation of the affordable housing units that could convert to market-rate during the planning period.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Monitor the status of projects at risk of conversion to market rate and ensure tenants receive proper notification of any changes and are aware of available special Section 8 vouchers (ongoing);
- Contact nonprofit housing developers annually to solicit interest in acquiring and managing the property in the event this or any similar project becomes at risk of converting to market rate; and
- Investigate funding opportunities and submit applications when applicable to support nonprofit housing developers and the preservation of existing at-risk units (ongoing).

5. FAIR HOUSING PRACTICES

Program 18: Community Outreach Program

Community outreach is a key component to developing a comprehensive and inclusive housing market in the City. It is critical to engage local community groups and stakeholders from all sectors of the community in order to educate and provide inclusive housing opportunities. The goal of this program is to provide community groups that are affected by restrictions to fair and equitable housing greater opportunities for becoming informed and engaged in the City's housing and overall planning process. Strategies to expand accessibility and help further educate community groups include:

- Increasing accessibility to public meetings for all sectors of the community including minority groups and persons with disabilities by ensuring public meetings are in accessible locations to all persons; and
- Ensuring public meetings and other planning processes are delivered in ways that all groups of the community can understand such as delivering meeting content in multiple languages; and
- Making public announcements and information accessible and visible in a multitude of ways.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Share and distribute public announcements/information through a variety of mediums such as flyers, E-blasts, website updates, new media, and social media (ongoing and with each discretionary housing project);
- Actively monitor existing stakeholders and seek to find additional stakeholders from all sectors of the community to engage in the public participation process (quarterly);
- Beginning in 2022, increase accessibility to public meetings by conducting public meetings at suitable times, having meetings be accessible to persons with disabilities, having meetings be accessible to nearby transit centers, and provide additional resources such as childcare, translation, and food services;
- Ensure public engagement opportunities are conducted in a variety of languages including Spanish to help reduce language barriers to the Hispanic community in Imperial; and
- Continue to educate all community groups of the services available when it comes to rental, homeownership, and rehabilitation/maintenance services (ongoing).

Program 19: Equitable Employment Program

The City of Imperial is committed to providing and expanding opportunities to people of all income-levels and community groups including employment. Access to housing is highly connected with access to employment as both housing costs and accessibility to employment centers are often large barriers to housing. The Equitable Employment Program seeks to expand opportunities to people of all sectors of the community to employment opportunities in the City by actively focusing on the following actions:

- Actively target and recruit residents from lower-income neighborhoods and neighborhoods of concentrate poverty to serve or participate in positions such as boards, committees, and other local/governmental positions;
- Develop and establish specific hiring practices that emphasize the recruitment of diverse and multi- lingual employees in the community;
- Continue to seek funding for support strategies including employment strategies that facilitate leadership development and professional growth, and;
- Expand public outreach to educate people in all neighborhoods about potential employment opportunities, resources to help with resumes and interviews, and additional resources to help access the closest employment centers to housing.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Increase recruitment to lower-income communities and people with disabilities and help connect these groups to employment opportunities in the City; and
- By 2022, develop and expand on hiring processes and make the hiring process more proactive in disadvantaged communities; and
- Continue to expand public outreach on potential employment opportunities and additional employment resources.

Program 20: Fair Housing Services

With assistance from the city’s fair housing provider, the city will continue to offer fair housing services to its residents and property owners. Additionally, AB 686 (2017) requires each city to administer its programs and activities related to housing in a manner that affirmatively furthers fair housing. Imperial will take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities.

Funding: CDBG, Section 8 Rental Assistance, Housing Trust Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Allocate annual funding for fair housing services through the City’s process for the use of CDBG funds;
- Hire additional staff and pursue contracting with the Inland Fair Housing and Mediation Board (IFHMB) to develop and oversee the implementation of fair housing programs;
- Participate in regional efforts to mitigate impediments to fair housing choice, including participation in the preparation of a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan;
- Distribute educational materials to property owners, apartment managers, and tenants relative to fair housing requirements, regulations, and services;
- Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities;
- Conduct workshops and training with different community-based organizations;
- Conduct fair housing workshops and training in Spanish;

- Hold diversity awareness events and programs at a variety of locations throughout the city;
- Outreach targeted and related to home financing opportunities;
- Monitor and respond to complaints of discrimination (i.e. intaking, investigation of complaints, and resolution);
- Referring services to appropriate agencies and connect lower-income residents with affordable homeownership and rental opportunities;
- Conduct fair housing testing at random sites to measure compliance and remove any such impediments through fair housing law enforcement;
- Work with transit agencies to increase mobility and routes;
- Target housing creation or mixed income strategies (e.g., funding, incentives, policies and programs, density bonuses, land banks, housing trust funds) and market opportunities in all parts of the community.

Program 21: Segregation in Housing Implementation

Despite the repeal of explicitly racist and discriminatory housing laws, there remains a lasting legacy of segregation and resources disparities. Housing choice is often limited for persons of protected classes, including communities of color, to segregated concentrated areas of poverty. Programs under this goal are designed to affirmatively reduce barriers to housing, including but not limited to racial inequities, high housing costs, and public awareness of existing resources.

Funding: General Fund

Responsible Agency: Community Development

Objectives and Timeframe:

- Monitor application of Development Code standards for constraints to development of new housing and recommend changes that would minimize such constraints and enhance the feasibility of affordable housing, while maintaining the quality of housing.

Summary of Quantified Objectives

Quantifiable housing adequacy is noted in Table 29. The City of Imperial has existing vacant land available for a variety of new construction housing project that would yield approximately 2,206 housing units. In addition, the City has approximately 45 "at risk" units targeted for preservation and an additional 10 units targeted for rehabilitation. The

City of Imperial does not have any HCD-registered Mobile Home Parks. The City intends to preserve at least five dwelling units via active code enforcement activities to extend the use of the dwellings that serve low income households and will pursue action through Program 17 to preserve the “at risk” units at Imperial Villa Apartments.

The city has the capacity to accommodate the city’s RHNA obligation plus an additional buffer for moderate and above moderate-income levels that will provide the city with a remaining capacity to address potential net loss issues over this planning period. Combined, the city has land resources and programs to accommodate the RHNA at all income levels. Furthermore, annexation of surrounding properties will continue to provide for future residential growth. The City's adopted Land Use Plan ensures that areas immediately adjacent to the incorporated City boundaries can accommodate low, medium, or high-density residential development, via SPA designations, to encourage annexation and facilitate the availability of existing infrastructure to provide essential services, such as potable water and sewer services in an efficient and cost-effective manner.

Table 29: Quantified Housing Adequacy 2021-2029

Income Category	RHNA Obligation	Vacant Sites Yield	Rehabilitation	Conservation/ Preservation
Low Income (includes Extremely, Very, and Low Incomes)	1,050	1,052	10	45
Moderate Income	294	557	0	0
Above Moderate Income	257	597	0	0
Total	1,601	2,206	10	45

Glossary of Terms

The following definitions are commonly used terms in a Housing Element while others derive from US Census Bureau:

Above Moderate-Income: Above moderate-income households are defined as households with incomes over 120 percent of the county median.

Accessible Units: Indicates certain units or all units in the property are wheelchair accessible or can be made wheelchair accessible. Accessible units also may include those that are accessible to people with sensory impairments or can be made accessible for people with sensory impairments.

Affordability: Annual cost of housing includes mortgage, principle and interest payments as amortized over 25 years with a 25 percent down payment or gross rent that does not exceed 30 percent of gross annual household income or 30 percent of gross annual income devoted to rental housing, including utilities are defined as "affordable".

Affordability Covenant: A property title agreement that places resale or rental restrictions on a housing unit; also known as a deed restriction.

Affordable Housing: "Affordable Housing" refers to the relationship between the price of housing in a region (either sale price or rent) and household income. Affordable housing is that which is affordable to households of very low, low and moderate incomes. For housing to be affordable, shelter costs must not exceed 30 percent of the gross annual income of the household.

Assisted Housing: Assisted housing refers to a unit that rents or sells for less than the prevailing market rate due to governmental monetary intervention or contribution. The terms "assisted" and "subsidized" are often used interchangeably.

At-Risk Housing: Applies to existing subsidized affordable rental housing units, especially federally subsidized developments, that are threatened with conversion to market rents because of termination of use restrictions, due to expiration or non-renewal of subsidy arrangements.

Below Market Rate (BMR) Unit: A BMR unit is a housing unit that sells or rents for less than the going market rate. It is typically used in reference to housing units that are directly or indirectly subsidized or have other restrictions in order to make them affordable to very low, low or moderate income households.

Children: The term "children," as used by the US Census and in tables on living arrangements of children under 18, are all persons under 18 years, excluding people who maintain households, families, or subfamilies as a reference person or spouse.

Community Development Block Grant (CDBG): The State CDBG program was established by the federal Housing and Community Development Act of 1974, as amended (42 USC 5301, et seq.). The primary federal objective of the CDBG program is the development of viable urban communities by providing decent housing and a suitable living environment and by expanding economic opportunities, principally for persons of low and moderate income. "Persons of low and moderate income" or the "targeted income group" (TIG) are defined as families, households, and individuals whose incomes do not exceed 80 percent of the county median income, with adjustments for family or household size.

Condominium: A building or group of buildings in which units are owned individually, but the structure, common areas and facilities are owned by all owners on a proportional, undivided basis.

Continuum of Care: An approach that helps communities plan for and provide a full range of emergency, transitional, and permanent housing and service resources to address the various needs of homeless persons at the point in time that they need them. The approach is based on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs – physical, economic, and social. Designed to encourage localities to develop a coordinated and comprehensive long-term approach to homelessness, the Continuum of Care consolidates the planning, application, and reporting documents for the U.S. Department of Housing and Urban Development's Shelter Plus Care, Section 8 Moderate Rehabilitation Single-Room Occupancy Dwellings (SRO) Program, and Supportive Housing Program. (U.S. House Bill 2163).

Cost Burden: A household has a "housing cost burden" if it spends 30 percent or more of its income on housing costs. A household has a "severe housing cost burden" if it spends 50 percent or more of its income on housing. Owner housing costs consist of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property; real estate taxes; fire, hazard, and flood insurance on the property; utilities; and fuels. Where applicable, owner costs also include monthly condominium fees. Renter calculations use gross rent, which is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else). Household income is the total pre-tax income of the householder and all other individuals at least 15 years old in the household. In all estimates of housing cost burdens, owners and renters for whom housing cost-to-income was not computed are excluded from the calculations.

Decennial Census: Every ten years, the Census Bureau conducts a national household survey, producing the richest source of nationally-available small-area data. Article I of the Constitution requires that a census be taken every ten years for the purpose of

reapportioning the U.S. House of Representatives. The federal government uses decennial census data for apportioning congressional seats, for identifying distressed areas, and for many other activities. Census data are collected using two survey forms: the short form and the long form. Short form information is collected on every person and includes basic characteristics, such as age, sex, and race. The long form is sent to one out of every six households and collects more detailed information, such as income, housing characteristics, and employment. Most of the indicators in DataPlace are from the long form, and are thus estimates based on the sample of households. These values may differ considerably from the same indicators based on the short form data, particularly for small areas.

Density: This refers to the number of housing units on a unit of land (e.g. ten units per acre).

Density Bonus Programs: Allows minimum density increase over the zoned maximum density of a proposed residential development, if the developer makes a specified amount of units affordable to lower income households.

Disability: A long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

Down payment Assistance: The most popular loans for these programs are with the Federal Housing Administration (FHA). FHA allows 100 percent gift funds for your down payment and some allowable closing costs. The gift can be from any relative or can be collected through charitable organizations like Neighborhood Gold / The Buyer Fund. Another popular tactic, which can be used in a broader range of loan programs, is to borrow from a 401K. A withdrawal can be made without a penalty and pay it back over a specified period.

Development Impact Fees: A fee or charge imposed on developers to pay for a jurisdiction's costs of providing services to new development.

Development Right: The right granted to a land owner or other authorized party to improve a property. Such right is usually expressed in terms of a use and intensity allowed under existing zoning regulation.

Dwelling Unit: Any residential structure, whether or not attached to real property, including condominium and cooperative units and mobile or manufactured homes. It includes both one-to- four family and multifamily structures. Vacation or second homes and rental properties are also included.

Elderly Units: Specific units in a development are restricted to residents over a certain age (as young as 55 years and over). Persons with disabilities may share certain developments with the elderly.

Element: A division or chapter of the General Plan, Master Plan or Comprehensive Plan.

Emergency Shelter: A facility designed to provide free temporary housing on a night-by-night basis to homeless families and individuals.

Emergency Shelter Grants (ESG): A grant program administered by the U.S. Department of Housing and Urban Development (HUD) provided on a formula basis to large entitlement jurisdictions.

Extremely Low-Income Limit: The upper limit for the extremely low-income category, set at 30 percent of the HUD area median family income. This is not an official program eligibility income limit, except when associated with a specific family size (e.g., "single person", "family of two", "family of three", etc.).

Fair Market Rent (FMR): Fair Market Rents (FMRs) are freely set rental rates defined by HUD as the median gross rents charged for available standard units in a county or Standard Metropolitan Statistical Area (SMSA). Fair Market Rents are used for the Section 8 Housing Choice Voucher Program and other HUD programs and are published annually by HUD.

Farm Labor Housing (Farm Worker): Units for migrant farm workers that can be available for transitional housing for the homeless when not occupied by migrant farm workers.

Family: A group of two or more people who reside together and who are related by birth, marriage, or adoption.

Family household (Family): A family includes a householder and one or more people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family. A family household may contain people not related to the householder, but those people are not included as part of the householder's family in census tabulations. Thus, the number of family households is equal to the number of families, but family households may include more members than do families. A household can contain only one family for purposes of census tabulations. Not all households contain families since a household may comprise a group of unrelated people or one person living alone.

Family Income: In decennial census data, family income includes the incomes of all household members 15 years old and over related to the householder. Although the family income statistics from each census cover the preceding calendar year, the characteristics of individuals and the composition of families refer to the time of enumeration (April 1 of the

respective census years). Thus, the income of the family does not include amounts received by individuals who were members of the family during all or part of the calendar year prior to the census if these individuals no longer resided with the family at the time of census enumeration. Similarly, income amounts reported by individuals who did not reside with the family during the calendar year prior to the census but who were members of the family at the time of enumeration are included. However, the composition of most families was the same during the preceding calendar year as at the time of enumeration.

Family size: Refers to the number of people in a family.

Family type: The US Census Bureau refers to family type as how the members of a family are related to one another and the householder. Families may be a "Married Couple Family," "Single Parent Family," "Stepfamily," or "Subfamily."

FHA-Insured: The Federal Housing Administration insured mortgages so that lower- and moderate income people can obtain financing for homeownership.

First-time homebuyer: A first-time homebuyer program provides low-income first time homebuyers down-payment assistance in the form of a second mortgage loan to serve as "gap financing". These loans can be up to \$40,000 depending on the amount of assistance required by the individual homebuyer.

General Plan: The General Plan is a legal document, adopted by the legislative body of a City or County, setting forth policies regarding long-term development.

Groups Quarters: A facility which houses groups of unrelated persons not living in households such as dormitories, institutions and prisons.

Habitable (room): A habitable room is a space in a structure for living, sleeping, eating or cooking. Bathrooms, toilet compartments, closets, storage or utility space, and similar areas, are not considered habitable space.

Habitat for Humanity: Habitat for Humanity is a nonprofit, ecumenical Christian housing ministry that seeks to eliminate poverty housing and homelessness from the world, and to make decent shelter a matter of conscience and action. Through volunteer labor and donations of money and materials, Habitat builds and rehabilitates simple, decent houses with the help of the homeowner (partner) families. Habitat houses are sold to partner families at no profit, financed with affordable, no-interest loans. The homeowners' monthly mortgage payments are used to build still more Habitat houses.

Hispanic or Latino: In decennial census data, Hispanics or Latinos are those who classify themselves in one of the specific Hispanic or Latino categories listed on the census questionnaire — "Mexican," "Puerto Rican," or "Cuban" — as well as those who indicate that they are "other Spanish, Hispanic, or Latino." People who do not identify with one of the specific origins listed on the questionnaire but indicate that they are "other Spanish,

Hispanic, or Latino” are those whose origins are from Spain, the Spanish-speaking countries of Central or South America, the Dominican Republic, or people identifying themselves generally as Spanish, Spanish-American, Hispanic, Hispano, Latino, and so on. People who are Hispanic or Latino may be of any race. There are two important changes to the Hispanic origin question for Census 2000. First, the sequence of the race and Hispanic origin questions for Census 2000 differs from that in 1990; in 1990, the race question preceded the Hispanic origin question. Second, there was an instruction preceding the Hispanic origin question in 2000 indicating that respondents should answer both the Hispanic origin and the race questions. This instruction was added to give emphasis to the distinct concepts of the Hispanic origin and race questions and to emphasize the need for both pieces of information.

Home Investment Partnership Program (HOME): HOME provides formula grants to States and localities that communities use—often in partnership with local nonprofit groups—to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.

Homeless Person: An individual living outside or in a building not meant for human habitation, or which they have no legal right to occupy, in an emergency shelter, or in a temporary housing program which may include a transitional and supportive housing program if habitation time limits exist. This definition includes substance abusers, mentally ill people, and sex offenders who are homeless. (U.S. House Bill 2163).

Household: A household is made up of all persons living in a dwelling unit whether or not they are related by blood, birth or marriage, according to the US Census Bureau.

Household Income: The total income of all the persons living in a household. A household is usually described as very low income, low income, moderate income, and above moderate income based on household size and income, relative to regional median income in US Census statistics.

Household Size: The total number of people living in a housing unit.

Household type and relationship: Households are classified by the US Census by type according to the sex of the householder and the presence of relatives. Examples include: married-couple family; male householder, no wife present; female householder, no husband present; spouse (husband/wife); child; and other relatives.

Householder: The person, or one of the people, in whose name the home is owned, being bought, or rented. If there is no such person present, any household member 15 years old and over can serve as the householder for the purposes of the census. Two types of householders are distinguished: a family householder and a non-family householder. A

family householder is a householder living with one or more people related to him or her by birth, marriage, or adoption. The householder and all people in the household related to him are family members. A non-family householder is a householder living alone or with non-relatives only.

Housing Authority: An organization established under state law to provide housing for low- and moderate-income persons. Commissioners are appointed by the local governing body of the jurisdiction in which they operate. Many housing authorities own their own housing or operate public housing funded by HUD.

Housing Choice Voucher Program: Housing Choice Voucher Program (formerly known as Section 8) is a subsidy program funded by the federal government and overseen by the Reno Housing Authority to provide low rents and/or housing payment contributions for very low and low-income households.

Housing Unit: A house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible.

HUD: The United States Department of Housing and Urban Development is cabinet level department of the federal government that oversees program and funding for affordable housing laws, development, and federally funded financial assistance.

HUD Area Median Family Income: HUD is required by law to set income limits that determine the eligibility of applicants for HUD's assisted housing programs. Income limits are calculated annually for metropolitan areas and non-metropolitan counties in the United States. They are based on HUD estimates of median family income, with adjustments for family size. Adjustments are also made for areas that have unusually high or low income to housing cost relationships.

Income Categories: The federal and state governments require that local jurisdictions consider the housing needs of households in various "income categories." Income categories are determined by the median household income at the local level.

Large Family or Household: A household or family with 5 or more members.

Low-Income Limit: Low-income households are defined as households with incomes between 50 percent and 80 percent of the area median household income.

Low-Income Housing: Housing that is made available at prices lower than market rates. These lower prices are achieved through various financial mechanisms employed by state and local government authorities.

Low-Income Housing Tax Credit (LIHTC): The LIHTC Program is an indirect Federal subsidy used to finance the development of affordable rental housing for low-income households. The LIHTC Program may seem complicated, but many local housing and community development agencies are effectively using these tax credits to increase the supply of affordable housing in their communities. This topic is designed to provide a basic introduction to the LIHTC Program.

Market Rate Housing: Housing that is not built or maintained with the help of government subsidy. The prices of market rate homes are determined by the market and are subject to the laws of supply and demand.

Manufactured Home: Housing that is constructed of manufactured components, assembled partly at the site rather than totally at the site. Also referred to as modular housing.

McKinney-Vento Act: The primary federal response targeted to assisting homeless individuals and families. The scope of the Act includes: outreach, emergency food and shelter, transitional and permanent housing, primary health care services, mental health, alcohol and drug abuse treatment, education, job training, and child care. There are nine titles under the McKinney-Vento Act that are administered by several different federal agencies, including the U.S. Department of Housing and Urban Development (HUD). McKinney-Vento Act Programs administered by HUD include: Emergency Shelter Grant Program Supportive Housing Program, Section 8 Moderate Rehabilitation for Single- Room Occupancy Dwellings, Supplemental Assistance to Facilities to Assist the Homeless, and Single Family Property Disposition Initiative. (U.S. House Bill 2163).

Median: This measure represents the middle value (if n is odd) or the average of the two middle values (if n is even) in an ordered list of data values. The median divides the total frequency distribution into two equal parts: one-half of the cases fall below the median and one-half of the cases exceed the median.

Median age: This measure divides the age distribution in a stated area into two equal parts: one-half of the population falling below the median value and one-half above the median value.

Median income: The median income divides the income distribution into two equal groups; one has incomes above the median and the other having incomes below the median. Each year, the federal government calculates the median income for communities

across the country to use as guidelines for federal housing programs. Area median incomes are set according family size.

Mental Illness: A serious and persistent mental or emotional impairment that significantly limits a person’s ability to live independently.

Mixed Use: This refers to different types of development (e.g. residential, retail, office, etc.) occurring on the same lot or in close proximity to each other. City and County’s sometimes allows mixed-use in commercial zones, with housing typically located above primary commercial uses on the premises.

Mobile Home: A type of manufactured housing. A structure movable in one or more sections, which is at least 8 feet in width and 32 feet in length, is built on a permanent chassis and designed to be used as a dwelling unit when connected to the required utilities, either with or without a permanent foundation.

Mobile Home Park: A parcel or tract of land having as its principal use the rental, leasing or occupancy of space by two or more mobile homes on a permanent or semi-permanent basis, including accessory buildings, or uses customarily incidental thereto.

Mobile Home Subdivision: A subdivision of land, platted in conformance to NRS Chapter 278 and applicable city ordinances for the purpose of providing mobile home lots.

Moderate-Income: Moderate-income households are defined as households with incomes between 80 percent and 120 percent of the county median.

Mortgage Credit Certificate Program (MCCs): The MCC is a Federal Income Tax Credit Program. An MCC increases the loan amount you qualify for and it increases an applicant's take-home pay. The MCC entitles applicants to take a federal income tax credit of twenty percent (20 percent) of the annual interest they pay on their home mortgage. Because the MCC reduces an applicant's federal income taxes and increases their net earnings, it helps homebuyers qualify for a first home mortgage. The MCC is registered with the IRS, and it continues to decrease federal income taxes each year for as long as an applicant lives in the home.

Mortgage Revenue Bond: A state, county or city program providing financing for the development of housing through the sale of tax-exempt bonds.

Multi-family Dwelling: A structure containing two or more dwelling units for the use of individual households; an apartment or condominium building is an example of this dwelling unit type.

Non-Hispanic: In decennial census data and in Home Mortgage Disclosure Act data after 2003, non- Hispanics are those who indicate that they are not Spanish/Hispanic/Latino.

Occupied housing unit: A housing unit is classified as occupied if it is the usual place of residence of the person or group of people living in it at the time of enumeration, or if the occupants are only temporarily absent; that is, away on vacation or a business trip. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated people who share living quarters.

Overcrowded units: Overcrowded units are occupied housing units that have more than 1 person per room.

Per capita income: Average obtained by dividing aggregate income by total population of an area.

Permanent Housing: Housing which is intended to be the tenant’s home for as long as they choose. In the supportive housing model, services are available to the tenant, but accepting services cannot be required of tenants or in any way impact their tenancy. Tenants of permanent housing sign legal lease documents. (U.S. House Bill 2163).

Permanent Supportive Housing: Long-term community-based housing and supportive services for homeless persons with disabilities. The intent of this type of supportive housing is to enable this special needs population to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or provided by other public or private service agencies. There is no definite length of stay. (U.S. House Bill 2163)

Persons with a Disability: HUD’s Housing Choice Voucher (formerly Section 8) program defines a “person with a disability” as: a person who is determined to : 1) have a physical, mental, or emotional impairment that is expected to be of continued and indefinite duration, substantially impedes his or her ability to live independently, and is of such a nature that the ability could be improved by more suitable housing conditions; or 2) have a developmental disability, as defined in the Developmental disabilities Assistance and Bill of Rights Act. (U.S. House Bill 2163)

Population estimate (Population Estimates Program): The Census Bureau's Population Estimates Program (PEP) produces July 1 estimates for years after the last published decennial census (2000), as well as for past decades. Existing data series such as births, deaths, Federal tax returns, Medicare enrollment, and immigration, are used to update the decennial census base counts. POP estimates are used in Federal funding allocations, in setting the levels of national surveys, and in monitoring recent demographic changes.

Population projections: Estimates of the population for future dates. They illustrate plausible courses of future population change based on assumptions about future births, deaths, international migration, and domestic migration. Projections are based on an estimated population consistent with the most recent decennial census as enumerated.

While projections and estimates may appear similar, there are some distinct differences between the two measures. Estimates usually are for the past, while projections typically are for future dates. Estimates generally use existing data, while projections must assume what demographic trends will be in the future.

Poverty: Following the Office of Management and Budget's (OMB's) Directive 14, the Census Bureau uses a set of money income thresholds that vary by family size and composition to detect who is poor. If the total income for a family or unrelated individual falls below the relevant poverty threshold, then the family or unrelated individual is classified as being "below the poverty level."

Poverty rate: The percentage of people (or families) who are below poverty, per the US Census Bureau.

Project-Based Rental Assistance: Rental assistance provided for a project, not for a specific tenant. A tenant receiving project-based rental assistance gives up the right to that assistance upon moving from the project.

Public Housing: The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies (HAs) that manage the housing for low-income residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments. It provides decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing can be in the form of high-rise apartments or scattered site single family homes.

Rehabilitation: The upgrading of a building previously in a dilapidated or substandard condition for human habitation.

Rental Assistance: A rental subsidy for eligible low and very low income tenants. This assistance provides the share of the monthly rent that exceeds 30% of the tenants' adjusted monthly income.

Rent-to-Own: A development is financed so that at a certain point in time, the rental units are available for purchase based on certain restrictions and qualifications.

Rural Housing Service (RHA): A part of the United States Department of Agriculture's Rural Development. The RHA offers financial aid to low-income residents of rural areas.

Second Units: Also referred to as "granny" or "in-law apartments." Second units provide a second housing unit on the same lot as a single-family dwelling unit.

Section 8: Section 8, now known as the Housing Choice Voucher Program is a subsidy program funded by the federal government and overseen by the Reno Housing Authority to

provide low rents and/or housing payment contributions for very low and low-income households.

Service Needs: The particular services required by special populations, typically including needs such as transportation, personal care, housekeeping, counseling, meals, case management, personal emergency response, and other services preventing premature institutionalization and assisting individuals to continue living independently.

Severely Overcrowded: Are occupied housing units with 1.51 or more persons per room.

Single family detached homes: This is a one-unit residential structure detached from any other house (i.e., with open space on all four sides). A house is considered detached even if it has an adjoining shed or garage.

Single family attached housing: This is a one-unit residential structure that has one or more walls extending from ground to roof separating it from adjoining structures. This category includes row houses, townhouses, and houses attached to non-residential structures.

Single-Room Occupancy Dwelling (SRO): The SRO Program provides rental assistance for homeless persons in connection with the moderate rehabilitation of SRO dwellings. SRO housing contains units for occupancy by one person. These units may contain food preparation or sanitary facilities, or both.

Special Needs Projects: Housing for a designated group of people who desire special accommodations, such as services, in addition to the housing. Services may or may not be provided as part of the rental project. Examples of special needs populations are people with physical disabilities, developmental disabilities, mental illness, or those who need assisted living. It also includes health care facilities.

Substandard Housing: This refers to housing where major repair or replacement may be needed to make it structurally sound, weatherproofed and habitable.

Subsidized Housing: Typically refers to housing that rents for less than the market rate due to a direct financial contribution from the government. There are two general types of housing subsidies. The first is most commonly referred to as “project-based” where the subsidy is linked with a particular unit or development and the other is known as “tenant-based” where the subsidy is linked to the low income individual or family. The terms “assisted” and “subsidized” are often used interchangeably.

Supportive Housing: Housing with a supporting environment, such as group homes or Single Room Occupancy (SRO) housing and other housing that includes a supportive service component such as those defined below.

Supportive Services: Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, child care, transportation, and job training.

Tenure: Refers to the distinction between owner-occupied and renter-occupied housing units. A housing unit is “owned” if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is “owned only if the owner or co-owner lives in it. All other occupied units are classified as “rented,” including units rented for cash rent and those occupied without payment of cash rent.

Transitional Housing: Housing for people recovering from substance abuse issues or transitioning from homelessness. Transitional housing provides longer term accommodations to homeless families and individuals than emergency shelter housing. Transitional Housing provides a stable living environment for the period of time necessary to learn new skills, find employment, and/or develop a financial base with which to re-enter the housing market.

Two-family buildings: These dwellings may also be referred to as single family attached because a duplex with a shared wall would qualify in both categories. Other two family buildings would include older single family homes that have been converted into two separate living spaces or “flats” that do not share walls, but a floor/ceiling.

Units in structure: A structure is a separate building that either has open spaces on all sides or is separated from other structures by dividing walls that extend from ground to roof and constitute a housing unit per the US Census Bureau. In determining the number of units in a structure, all housing units, both occupied and vacant, are counted.

Unemployed: Per the US Census Bureau, all civilians 16 years old and over are classified as unemployed if they (1) were neither “at work” nor “with a job but not at work” during the reference week, and (2) were actively looking for work during the last 4 weeks, and (3) were available to accept a job. Also included as unemployed are civilians who did not work at all during the reference week, were waiting to be called back to a job from which they had been laid off and were available for work except for temporary illness.

Unemployment Rate: The proportion of the civilian labor force that is unemployed, expressed as a percent.

Vacant Housing Unit: A housing unit is vacant if no one is living in it at the time of enumeration, unless its occupants are only temporarily absent. Units temporarily occupied at the time of enumeration entirely by people who have a usual residence elsewhere are also classified as vacant. New units not yet occupied are classified as vacant housing units if construction has reached a point where all exterior windows and doors are installed and final usable floors are in place. Vacant units are excluded from the housing inventory if they

are open to the elements; that is, the roof, walls, windows, and/or doors no longer protect the interior from the elements. Also excluded are vacant units with a sign that they are condemned or they are to be demolished.

Vacancy Rate: The housing vacancy rate is the proportion of the housing inventory that is available “for sale” or “for rent.” It is computed by dividing the number of available units by the sum of occupied units and available units, and then multiplying by 100.

VA-Guaranteed: VA guaranteed loans are made by private lenders to eligible veterans for the purchase of a home which must be for their own personal occupancy. To get a loan, a veteran must apply to a lender. If the loan is approved, VA will guarantee a portion of it to the lender. This guaranty protects the lender against loss up to the amount guaranteed and allows a veteran to obtain favorable financing terms.

Very Low-Income Limit: Very low-income households are defined as households with incomes less than 50 percent of the area median household income.

Veteran: Anyone who has been discharged from the military generally after at least two years of service whether they served on active duty in a conflict or not. (U.S. House Bill 2163).

Workforce Housing: Refers to housing that is meant for residents making low, moderate to above moderate area median income. Some programs focus on employers providing assistance to their employees; some are instituting inclusionary programs, while others give preference to this group in their homeownership programs. Some jurisdictions have programs for specific segments of the workforce that are vital for the everyday function of the community such as teachers, policeman and other public employees.

Year Structure (housing unit) Built: Year structure built refers to when the building was first constructed, not when it was remodeled, added to, or converted. For housing units under construction that met the housing unit definition—that is, all exterior windows, doors, and final usable floors were in place—the category “1999 or 2000” was used for tabulations. For mobile homes, houseboats, recreational vehicles, etc, the manufacturer’s model year was assumed to be the year built. The data relate to the number of units built during the specified periods that were still in existence at the time of enumeration.

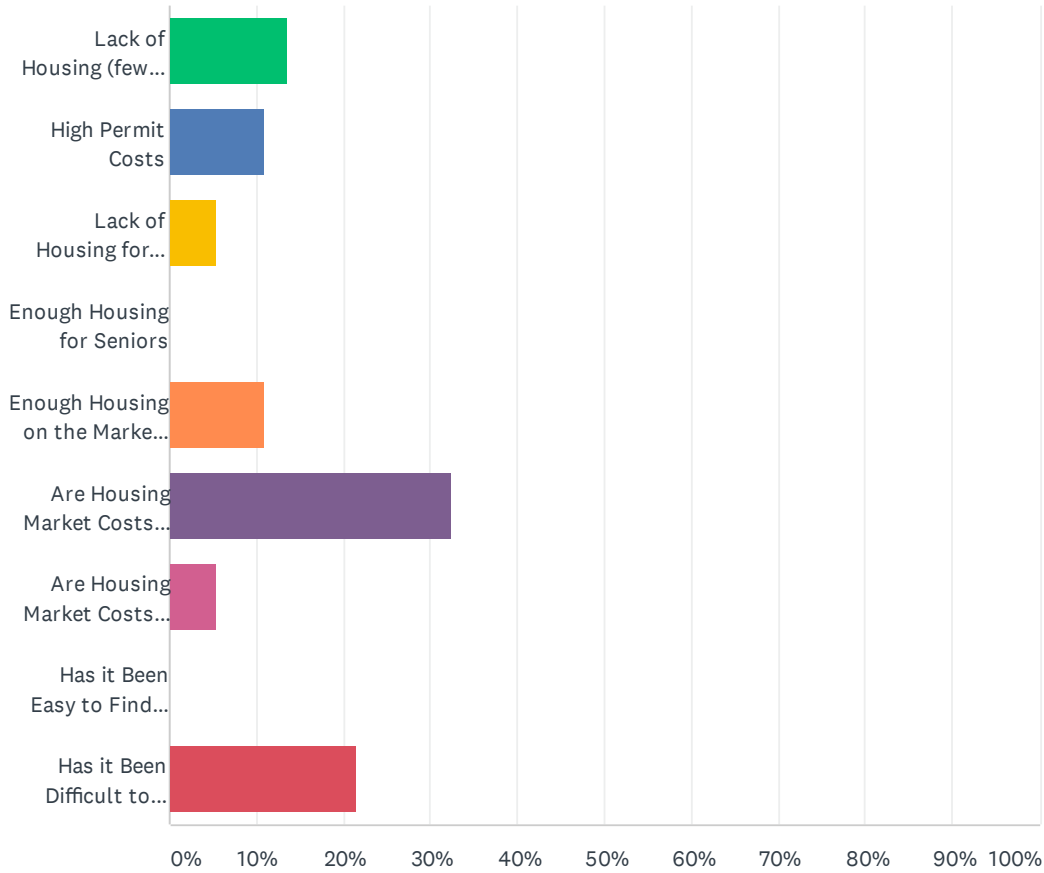
Zoning: Zoning is an activity undertaken by local jurisdictions to direct and shape land development activities. The intent of zoning is to protect the public health, safety, and welfare by ensuring that incompatible land uses (e.g. residential vs. heavy industrial) are not located next to each other. Zoning also impacts land values, creating and taking away “capitol” for and from property owners. For example, a lot that is zoned for commercial development is more valuable (in financial terms) than a lot that is zoned for open space. Typically, lots that are zoned for higher densities have greater value on the market than

lots that are zoned for lower densities. Zoning is one of the most important regulatory functions performed by local jurisdictions.

Appendix A: Public Survey Results

Q1 What housing issues have you experienced within the City of Imperial?

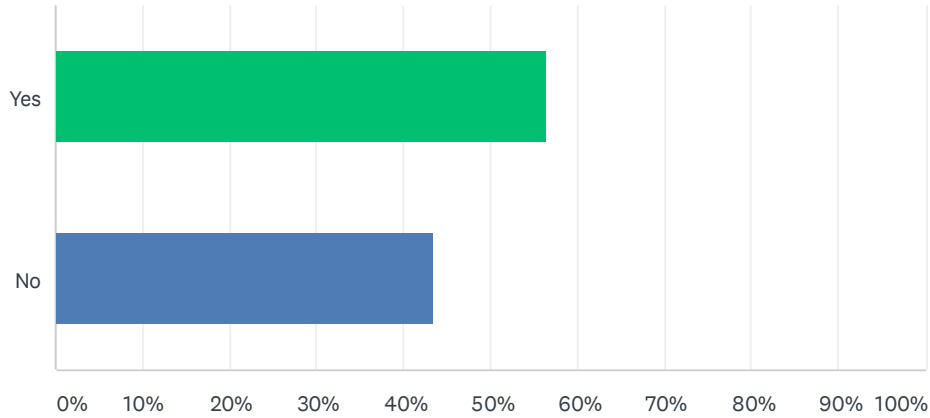
Answered: 37 Skipped: 3



ANSWER CHOICES	RESPONSES	
Lack of Housing (few single-family homes for sale; Quantity)	13.51%	5
High Permit Costs	10.81%	4
Lack of Housing for Seniors	5.41%	2
Enough Housing for Seniors	0.00%	0
Enough Housing on the Market (sufficient single-family homes for sale)	10.81%	4
Are Housing Market Costs too High (Affordability of housing for single-family homes)	32.43%	12
Are Housing Market Costs Acceptable (Affordability of housing for single-family homes)	5.41%	2
Has it Been Easy to Find Rental Units Within the City of Imperial	0.00%	0
Has it Been Difficult to Find Rental Units Within the City of Imperial	21.62%	8
TOTAL		37

Q2 Do you believe there is a need for Affordable Residential Developments that would benefit various Socio-Demographics (Age, Gender, Ethnicity, Education Level, Income Level)?

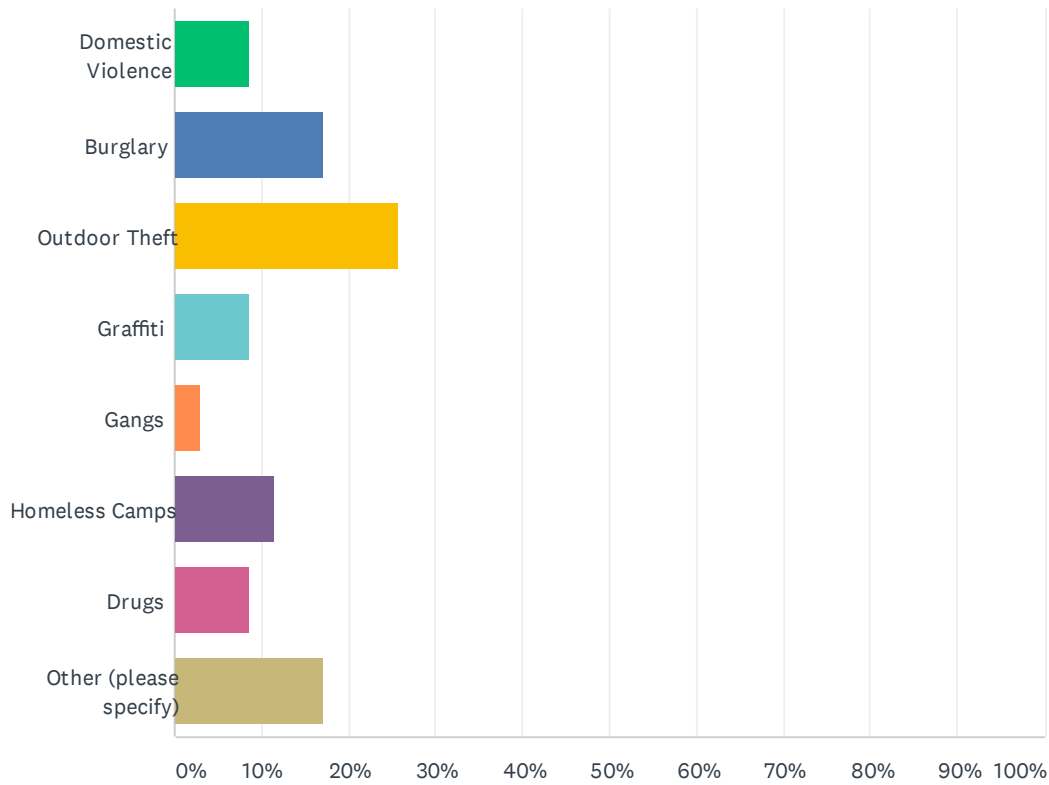
Answered: 39 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	56.41%	22
No	43.59%	17
TOTAL		39

Q3 Please identify any concerns regarding safety and crime within the City of Imperial:

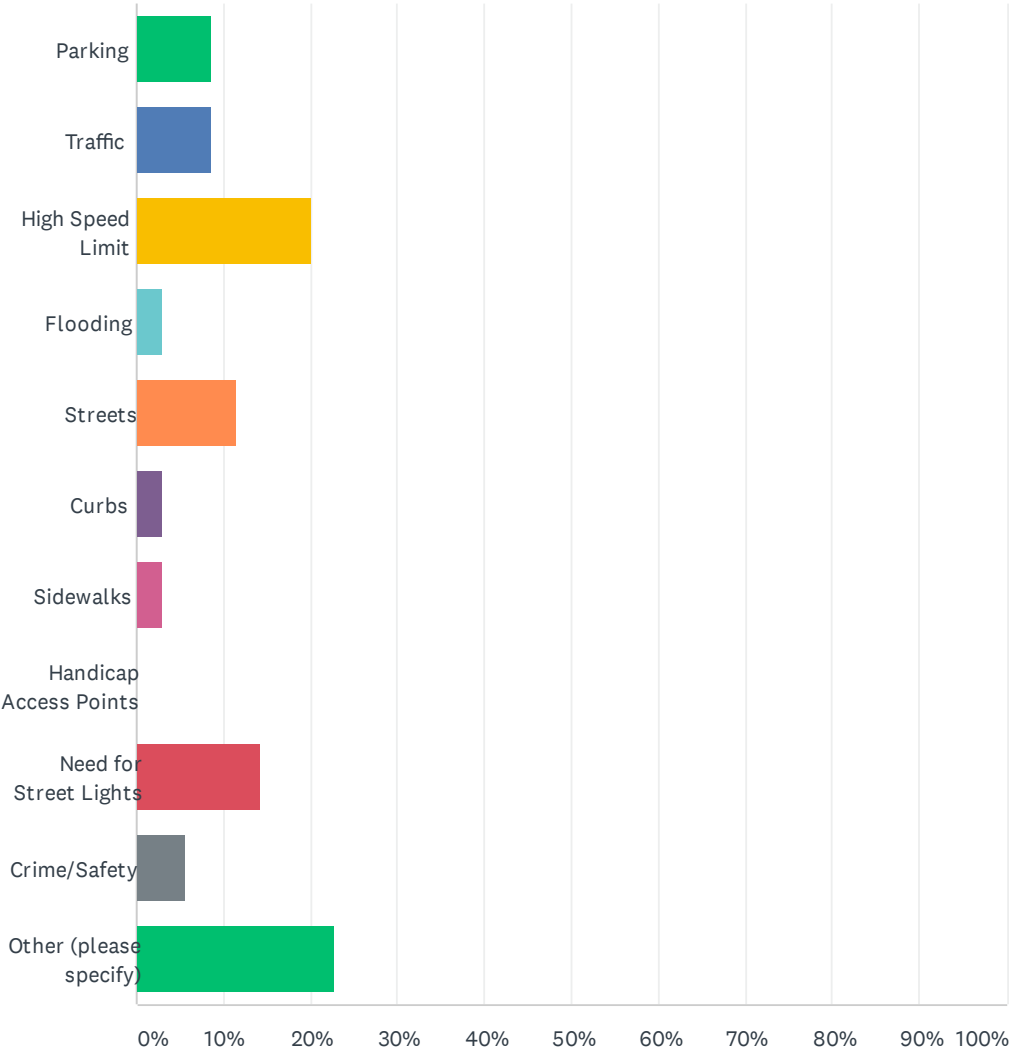
Answered: 35 Skipped: 5



ANSWER CHOICES	RESPONSES	
Domestic Violence	8.57%	3
Burglary	17.14%	6
Outdoor Theft	25.71%	9
Graffiti	8.57%	3
Gangs	2.86%	1
Homeless Camps	11.43%	4
Drugs	8.57%	3
Other (please specify)	17.14%	6
TOTAL		35

Q4 Please indicate any issues in your neighborhood regarding the following topics:

Answered: 35 Skipped: 5

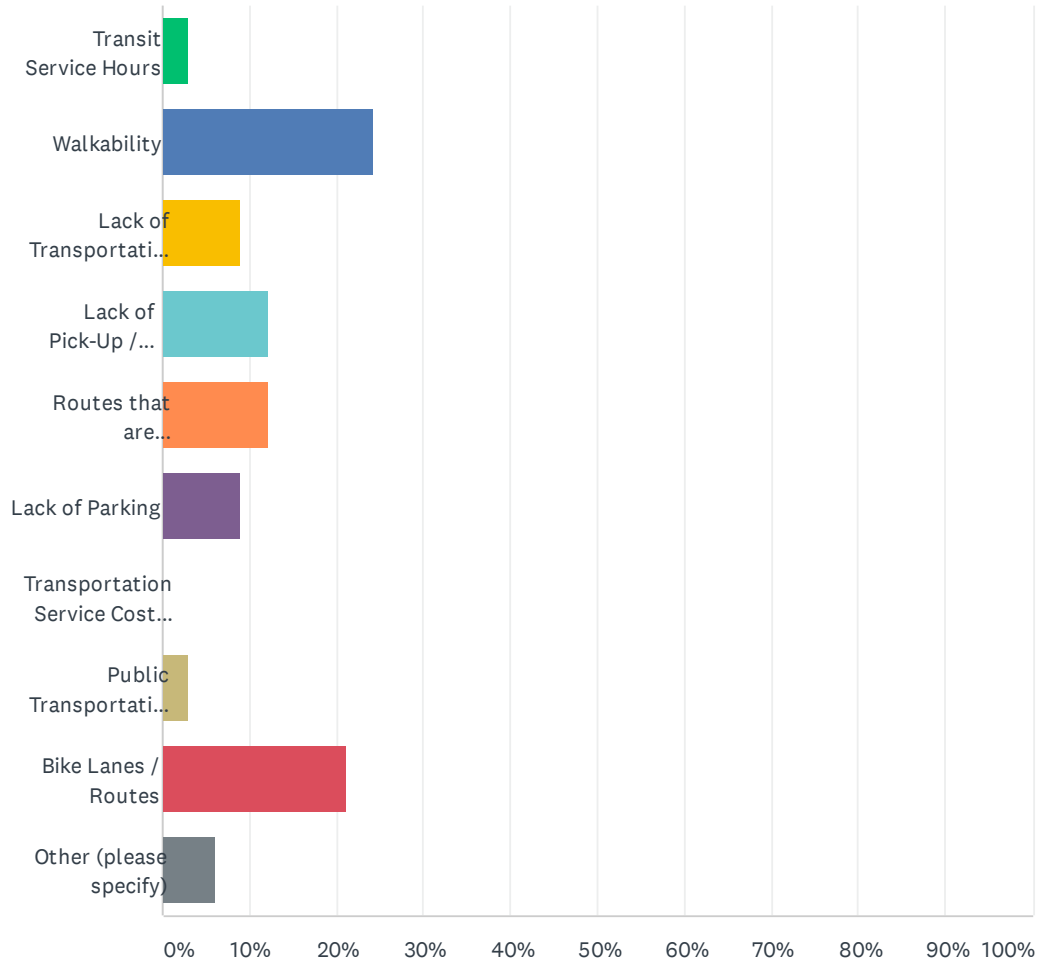


City of Imperial - 6th Cycle Housing Element Survey 2021-2025

ANSWER CHOICES	RESPONSES	
Parking	8.57%	3
Traffic	8.57%	3
High Speed Limit	20.00%	7
Flooding	2.86%	1
Streets	11.43%	4
Curbs	2.86%	1
Sidewalks	2.86%	1
Handicap Access Points	0.00%	0
Need for Street Lights	14.29%	5
Crime/Safety	5.71%	2
Other (please specify)	22.86%	8
TOTAL		35

Q5 Please identify any transportation issues within the City of Imperial

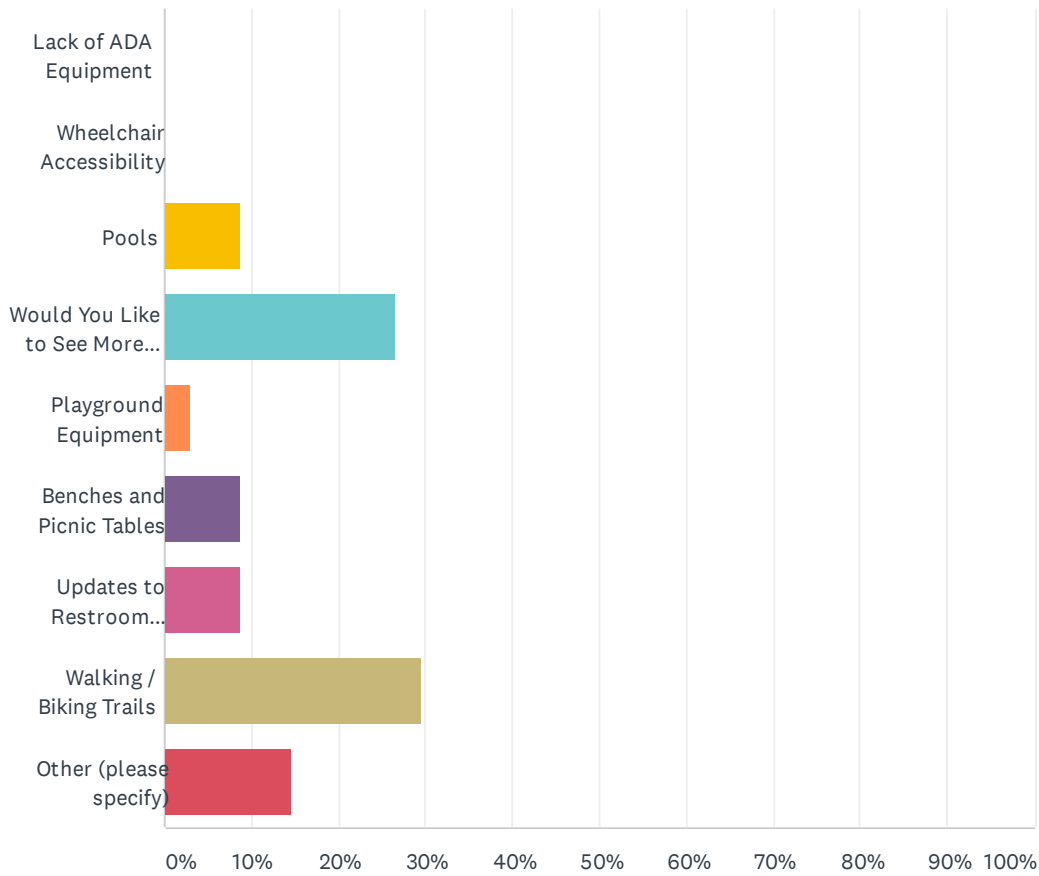
Answered: 33 Skipped: 7



ANSWER CHOICES	RESPONSES	
Transit Service Hours	3.03%	1
Walkability	24.24%	8
Lack of Transportation Routes	9.09%	3
Lack of Pick-Up / Drop-Off Locations	12.12%	4
Routes that are Disconnected	12.12%	4
Lack of Parking	9.09%	3
Transportation Service Cost is too High	0.00%	0
Public Transportation Services are Unreliable	3.03%	1
Bike Lanes / Routes	21.21%	7
Other (please specify)	6.06%	2
TOTAL		33

Q6 Please identify any improvements or needs regarding the parks within the City of Imperial:

Answered: 34 Skipped: 6



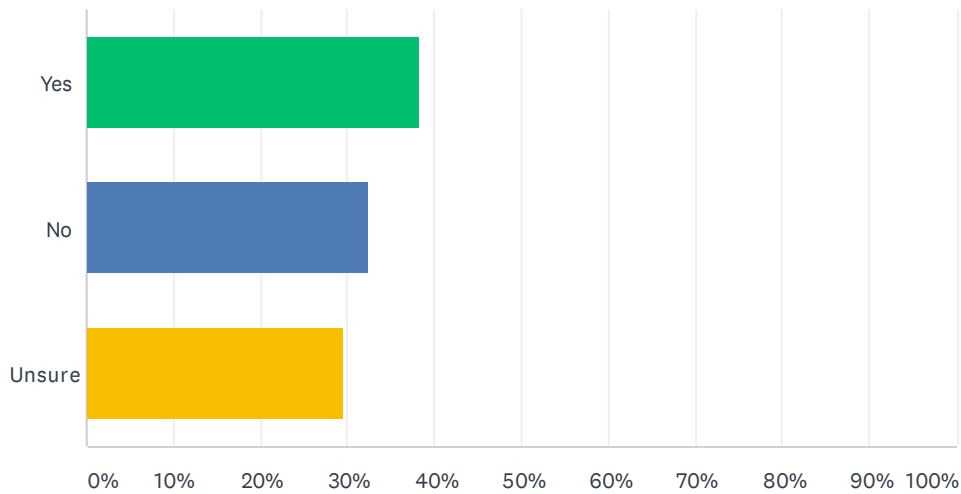
ANSWER CHOICES	RESPONSES	
Lack of ADA Equipment	0.00%	0
Wheelchair Accessibility	0.00%	0
Pools	8.82%	3
Would You Like to See More Parks with "Splash Water Equipment"	26.47%	9
Playground Equipment	2.94%	1
Benches and Picnic Tables	8.82%	3
Updates to Restroom Facilities	8.82%	3
Walking / Biking Trails	29.41%	10
Other (please specify)	14.71%	5
TOTAL		34

Q7 Are there any "Public and/or Community" Services that you believe are missing or underfunded?

Answered: 16 Skipped: 24

Q8 Are you aware of how to report "Fair Housing Violations" The Federal Housing Act and State Law protects people from discrimination based on race, color, national origin, religion, sex, familial status or disability, when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities."

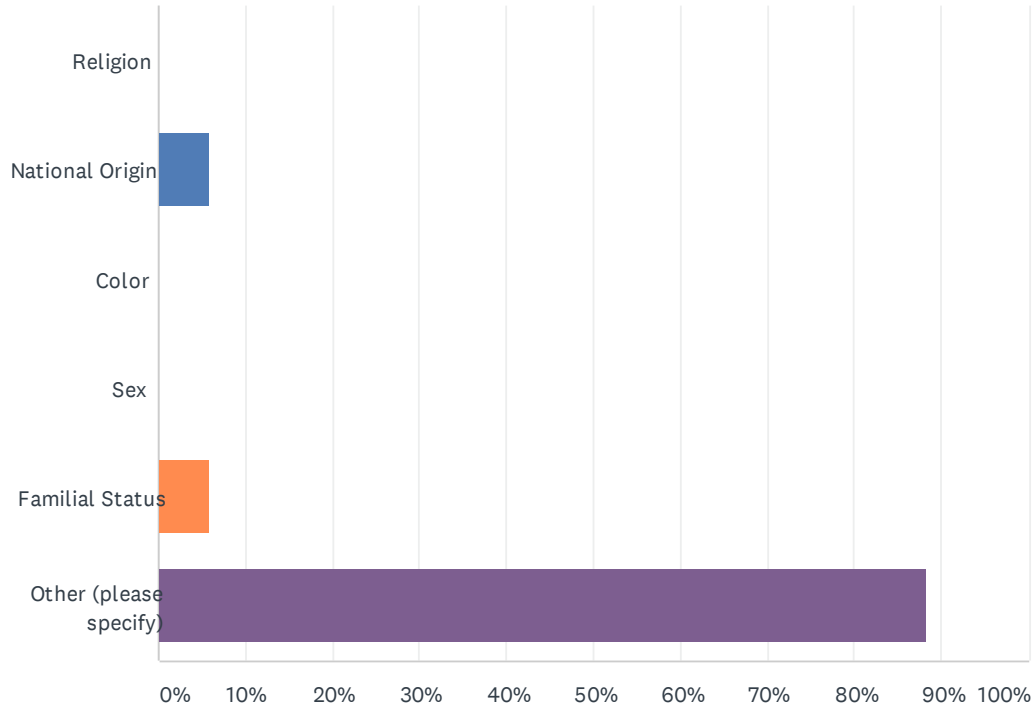
Answered: 34 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes	38.24%	13
No	32.35%	11
Unsure	29.41%	10
TOTAL		34

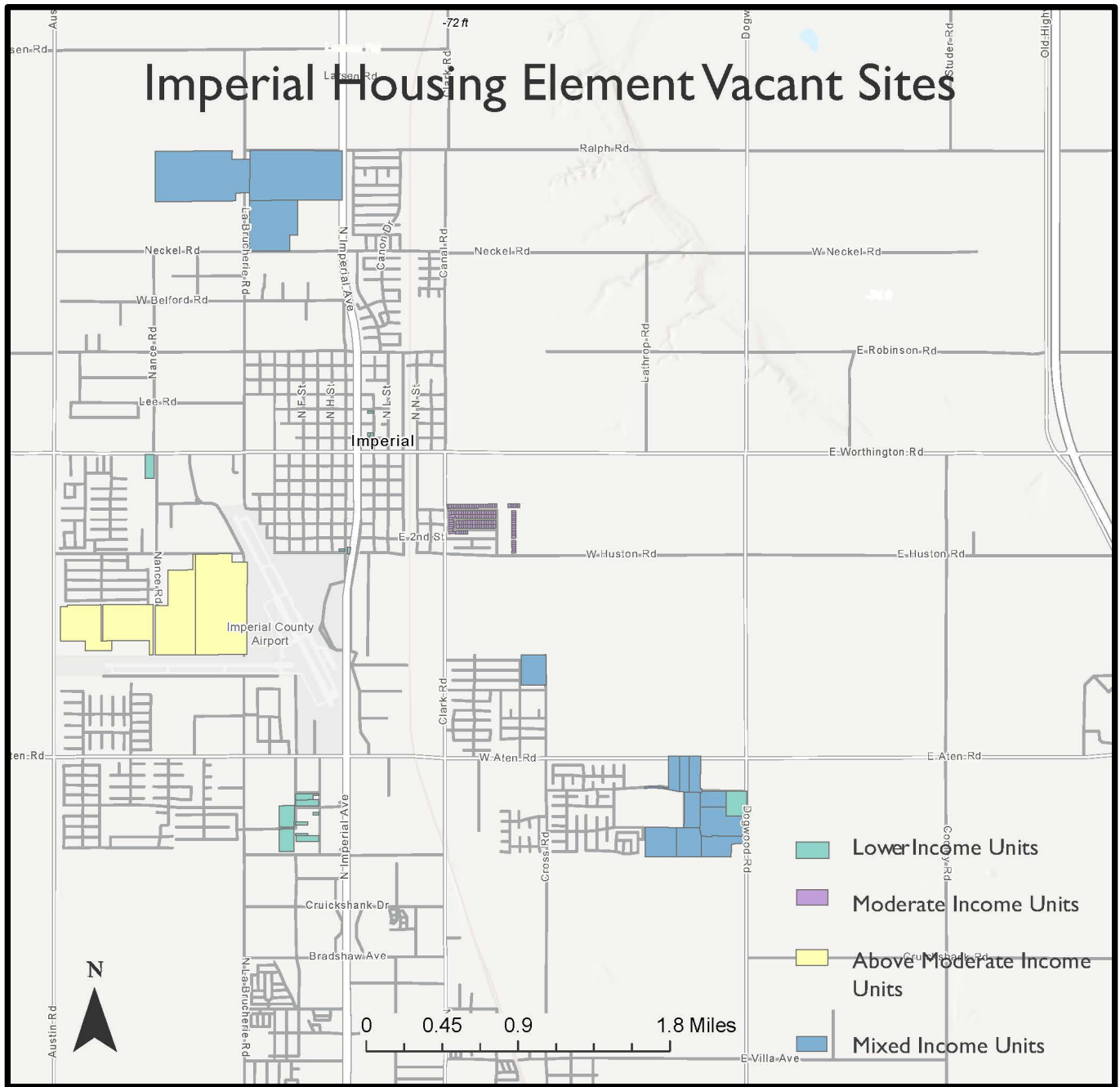
Q9 Have you experienced housing discrimination within the City of Imperial?

Answered: 17 Skipped: 23



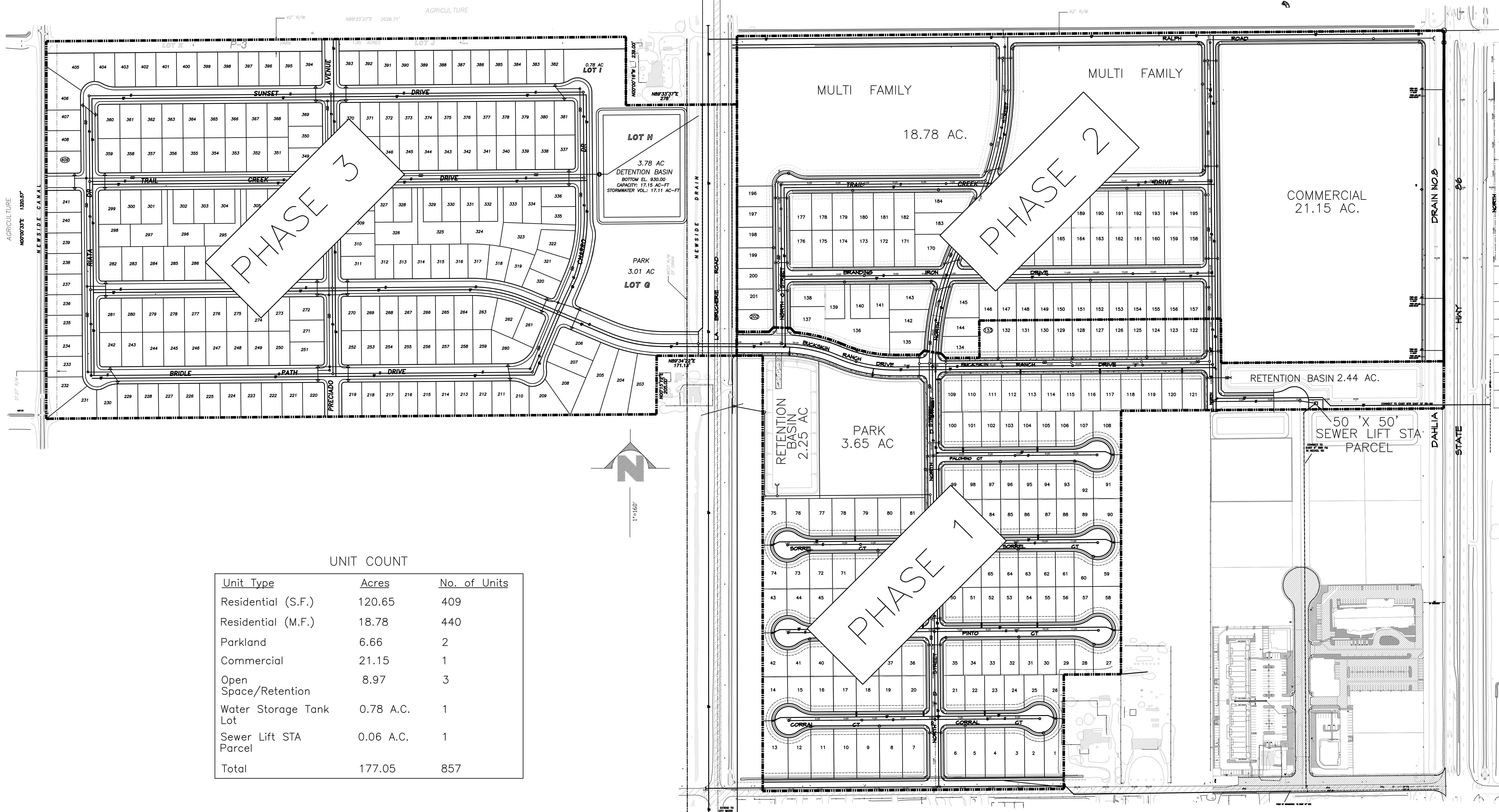
ANSWER CHOICES	RESPONSES	
Religion	0.00%	0
National Origin	5.88%	1
Color	0.00%	0
Sex	0.00%	0
Familial Status	5.88%	1
Other (please specify)	88.24%	15
TOTAL		17

Appendix B: Site Inventory Table and Map



Appendix C: Morningstar Subdivision Phasing Plan

X:\Projects (Active)\LCE\Morningstar Sub\Phasing Plan 7-26-19.dwg 07/29/2019 11:58



UNIT COUNT

Unit Type	Acres	No. of Units
Residential (S.F.)	120.65	409
Residential (M.F.)	18.78	440
Parkland	6.66	2
Commercial	21.15	1
Open Space/Retention	8.97	3
Water Storage Tank Lot	0.78 A.C.	1
Sewer Lift STA Parcel	0.06 A.C.	1
Total	177.05	857

	UNDERGROUND SERVICE ALERT CALL: TOLL FREE 811 TWO WORKING DAYS BEFORE YOU DIG	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>No.</th> <th>REVISIONS</th> <th>BY</th> <th>DATE</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	No.	REVISIONS	BY	DATE													APPROVED BY ACTING CITY ENGINEER CITY OF IMPERIAL, CA. BY: _____ DATE: _____ R.C.E. NO.: _____	SEAL ENGINEER OF RECORD PLANS PREPARED UNDER THE SUPERVISION OF BY: CARLOS CORRALES DATE: _____ R.C.E. NO.: 55432	SEAL 	LC ENGINEERING CONSULTANTS INC. CIVIL ENGINEERING • LAND SURVEYING • CONSTRUCTION MANAGEMENT SERVICES 1065 State Street El Centro CA 92243 www.lcec-inc.com tel 760.353.8100 fax 760.353.6408 DATE: 07/22/19 BENCHMARK: SEE SHEET NO. 1	MORNING STAR SUB. PROPOSED PHASING FOR DEVELOPMENT W.O.	SHEET 1 OF 1 SHEETS JOB NO. C19037-00
No.	REVISIONS	BY	DATE																					

Appendix D: Affirmatively Furthering Fair Housing

Appendix D: Affirmatively Furthering Fair Housing

D.1 Introduction and Overview of AB 686

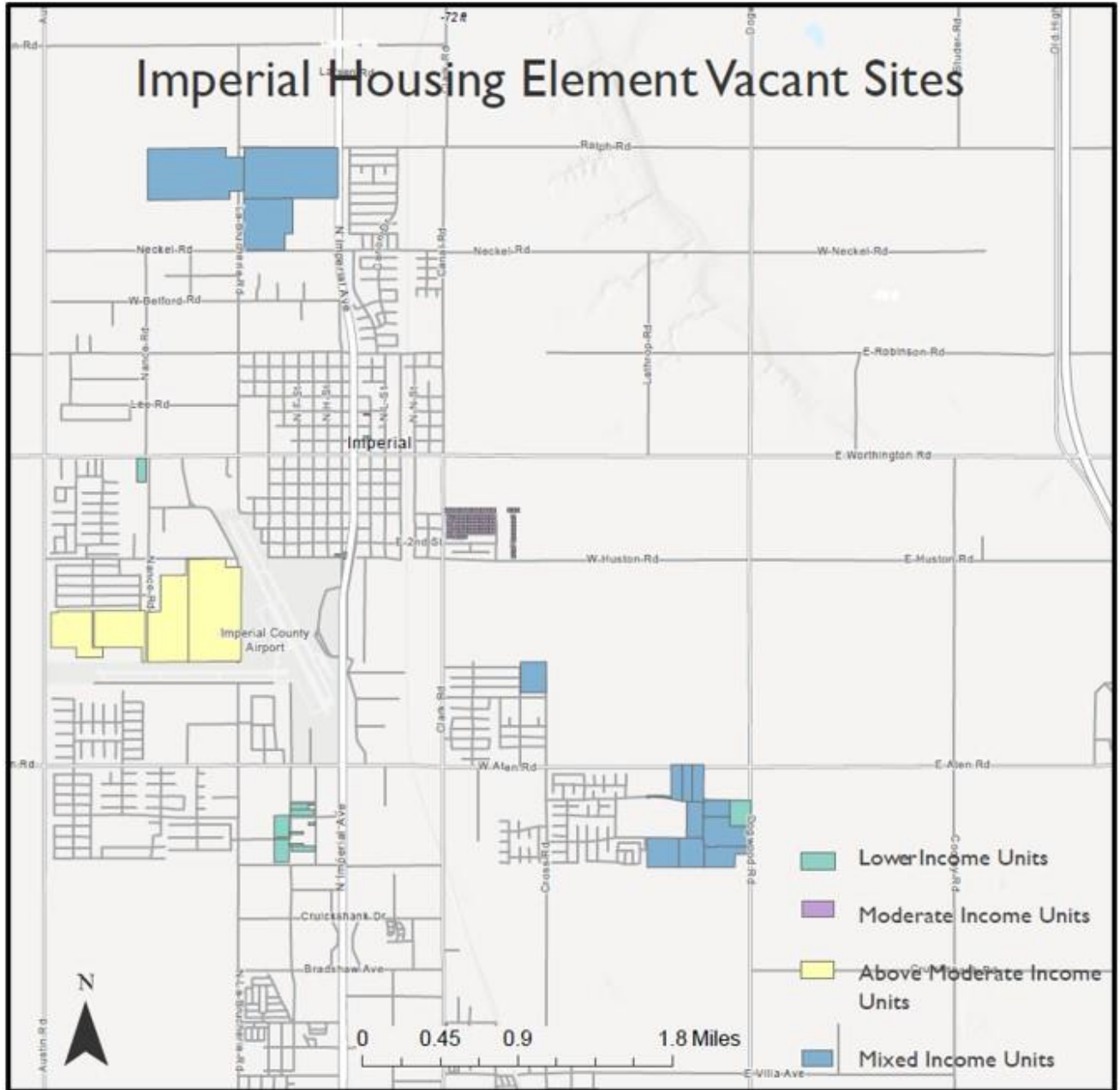
AB 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. The Bill added an assessment of fair housing to the Housing Element which includes the 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.

An Analysis of Impediments (AI) to Fair Housing Choice examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies any existing impediments that limit housing choice, and proposes actions to mitigate those impediments. However, the City of Imperial does not have their own AI. However, the City of El Centro's prepared the 2019-2024 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (2019 AI) with valuable input from the Community Development Department, Inland Fair Housing and Mediation Board, Imperial County Association of Realtors, Access to Independent, Imperial Valley Transit, Imperial Valley Housing Authority (IVHA), and their community. As a neighboring City with many overlapping issues and concerns, the City of El Centro's AI was referenced, as appropriate, in this analysis. Imperial County does not prepare Analysis of Impediments to Fair Housing Choice, therefore, regional data for this analysis uses HCD's 2020 AI for regional comparisons.

D.2 Assessment of Fair Housing Issues

The below sections identify the required issue areas for consideration in the affirmatively further fair housing (AFFH) analysis and describe the regional and local trends (when data is available) for the County and the City of Imperial. As part of this AFFH analysis, the City must show sites identified in the inventory were selected a manner that is consistent with its duty to affirmatively further fair housing. If applicable, each section also assesses the location and distribution of the RHNA units which are presented by location and income level in Figure D-1. It should be noted that all RHNA units are accommodated for on vacant sites and due to the unique affordability characteristics of the City, certain sites, referred to as "Mixed Income Sites" can accommodate both moderate and above-moderate income levels of housing.

Figure D-1: City of Imperial RHNA Unit Distribution



A. Fair Housing Enforcement and Outreach

Housing discrimination complaints can be filed directly with HUD. In California the housing discrimination complaints are processed by HUD's San Francisco Office of Fair Housing and Equal Opportunity (FHEO). City of Imperial residents may also file complaints with the State Department of Fair Employment and Housing (DFEH), and local fair housing providers such as the Inland Fair Housing and Mediation Board.

Fair Housing Enforcement

HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO investigates fair housing complaints, conducts compliance reviews, ensures civil rights in HUD programs, and manages fair housing grants. According to HCD's 2020 Analysis of Impediments to Fair Housing, 4,198 fair housing complaints were filed in California between January 1, 2015, and November 14, 2019, with the number of complaints decreasing from 1,158 in 2015 to 327 in 2019. Based on a Community Needs Assessment Survey and stakeholder consultations conducted as part of the 2020 AI, HCD concluded that people are choosing not to report complaints due to a limited understanding of fair housing protections and a lack of resources to support fair housing claims at the local level.

The California Department of Fair Employment and Housing (DFEH), in partnership with HCD, is also responsible for enforcing California's state fair housing laws. The department handles fair housing complaints, provides resources to the community, and cooperates with HUD if the matter falls into HUD's jurisdiction. According to the DFEH Annual Reports, 12 housing complaints were filed by complainants in Imperial County between 2013 and 2019. The Annual Reports did not include details for the basis for discrimination of these complaints. However, HCD's 2020 AI reported that statewide, between 2015 and 2019, the primary basis of fair housing complaints filed with DFEH was disability (51 percent), followed by race, color, or ancestry, 16 percent, and familial status, 10 percent.

The Community Development Department of the City of Imperial works with the Building Department in investigating and resolving housing discrimination complaints through the referral to HUD and other County services such as the IVHA and Inland Fair Housing and Mediation Board (IFHMB). No data related to fair housing complaints is available for this analysis and the City does not have a dedicated webpage related to available fair housing services. Staffing issues have been identified as a major contribution to the lack of City specific enforcement programs and practices.

Fair Housing Education and Outreach

The 2021-2021 Imperial County Housing Element contained a review of the County's housing outreach program (Program 4.1.1) for the 5th Cycle that "encourage[d] the development and implementation of housing outreach and education programs to inform the public of available housing opportunities, as well as various assistance programs available to eligible households, by continuing to provide information about the County's housing programs by posting flyers on community boards and at gas stations, schools, and other public places." The review of the program reported that while the County discusses strategies to encourage housing outreach and education programs at all Board of Supervisor meetings, there has been no interest in such a program. The County's 2021-2029 Element includes a new Fair Housing Outreach Program which commits the County to:

- Develop bilingual outreach materials to inform the public of available housing opportunities,

as well as various assistance programs available to eligible households, to be posted on the County's website and community boards and at gas stations, schools, and other public places and;

- Coordinate with local fair housing providers to conduct a public workshop on tenant and landlord rights and responsibilities.

As a part of developing a Countywide plan to address the Assessment of Fair Housing (AFH), Imperial County conducted a series of outreach events to gather citizen values and concerns. The following events were held for residents, agencies and local stakeholders:

- January and February 2021: The County reached out to ten community organizations, fair housing advocates, services providers, and stakeholders to assess housing needs in the County. Three of ten participated:
 - Campesinos Unidos – January 26, 2021
 - Housing Authority of the County of Imperial County– February 9, 2021
 - Imperial County Department of Social Services – February 12, 2021
- April 27 and 28, 2021: The County held two virtual community workshops.

The County marketed the outreach events through distributing flyers in Spanish and English to stakeholder organizations, affordable housing providers, and community organizations. All community meetings had Spanish-speaking breakout rooms in order to provide accessible information to residents.

The City of Imperial relies on the County of Imperial outreach efforts to further fair housing education to its residents. Staffing issues have been identified as a major contribution to the lack of City specific outreach programs and practices.

B. Integration and Segregation

Race/Ethnicity

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 measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices can be used to are used to measure how evenly two groups are distributed throughout a jurisdiction. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

Regional Trends

Imperial County is unique in southern California and the state in that its Hispanic population is significantly higher (more than twice) the proportion observed statewide (39 percent) and in the Los Angeles and San Diego Counties (46 percent and 34 percent, respectively, Table D- 1). In Imperial County, 84 percent of the population identifies as Hispanic or Latino. Most cities within the county

have similar share of Hispanic population, ranging from 75 percent in Calipatria to 98 percent in Calexico. Because Hispanic population is predominant in Imperial County, the share of White population is also significantly lower than statewide and in other Southern California counties. Only 10 percent of the population is White, with all other races having shares of less than two percent of the entire population.

Between 2000 and 2017, Imperial County's Hispanic population increased by almost 51,241 persons and its share of the total population increased from 72 percent in 2000 to 84 in 2017. During the 18-year period, the Asian, Black, and White populations decreased in both absolute and relative terms. That means that Hispanics accounted for all the population increase in Imperial County between 2000 and 2017.

Table D- 1: Race/Ethnicity Composition-Regional Comparison

	California	Los Angeles	San Diego	Imperial County	El Centro	Brawley	Calexico	Calipatria	Holtville	Imperial	Westmorland
White	37.2%	26.2%	45.6%	10.6%	8.3%	12.2%	1.0%	5.8%	16.8%	17.1%	10.8%
Black or African Am	5.5%	7.8%	4.7%	2.1%	1.4%	1.2%	0.2%	15.0%	0.7%	1.7%	2.5%
Am. Ind/ Alaska Native	0.4%	0.2%	0.4%	0.6%	0.1%	0.3%	0.1%	0.6%	0.0%	0.3%	1.4%
Asian	14.3%	14.4%	11.6%	1.3%	2.2%	0.4%	0.9%	0.7%	0.0%	2.3%	0.4%
Native Hawaiian/Pacific Islander	0.4%	0.2%	0.4%	0.1%	0.2%	0.3%	0.0%	0.6%	0.0%	0.0%	0.0%
Other Races	3.3%	2.6%	3.6%	0.9%	0.8%	1.8%	0.1%	1.6%	0.4%	0.6%	2.2%
Hispanic or Latino	39.0%	48.5%	33.7%	84.2%	87.0%	83.7%	97.8%	75.7%	82.1%	78.0%	82.6%
Source: ACS 2013-2019 5-year estimates											

As explained above, dissimilarity indices are measures of segregation, with higher indices meaning higher degree of segregation. In Imperial County, all minority (non-white) residents combined are considered moderately segregated from White residents (index is 41.76 in 2020). However, the dissimilarity index between Black and White residents is considered a high degree of segregation (61.18). All dissimilarity indices have decreased in the past 30 years in the County, except for Blacks/Whites, for which the dissimilarity index increased by close to 20 points, indicating increasing segregation among residents of non-White races from Whites. Given that the population of all races decreased between 2000 and 2017, the increase in the dissimilarity index for Blacks/Whites indicates blacks are disproportionately segregated.

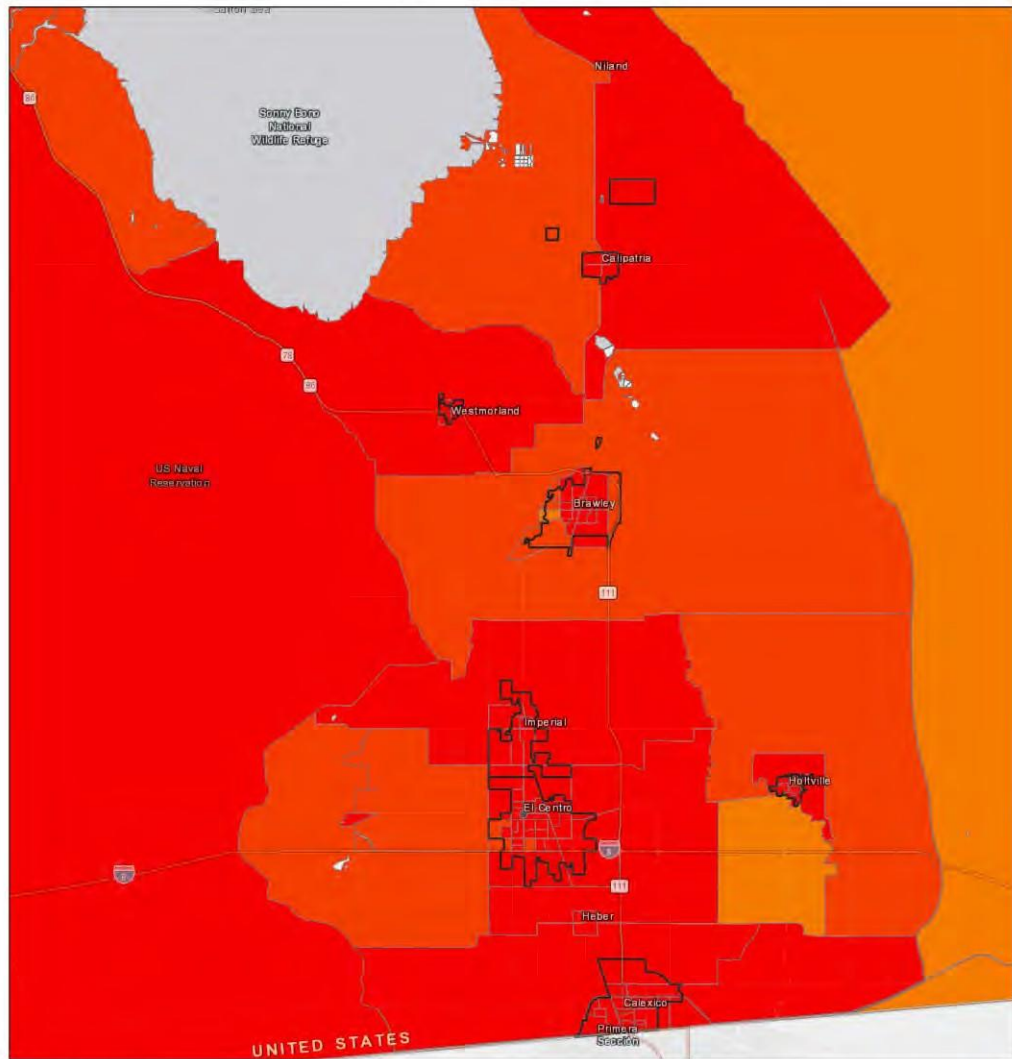
Table D- 2: Dissimilarity Indices for Imperial County (1990-2020)

	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	43.79	40.2	38.4	41.76
Black/White	43.49	55.26	54.97	61.18
Hispanic/White	45.39	43.45	40.91	44.3
Asian or Pacific Islander/White	38.26	40.53	28.4	36.98
Sources: HUD Dissimilarity Index, 2020.				

Figure D-2 below shows the concentration of minority population in the County is widespread across Imperial County. Figure D- 3 shows census tracts in Imperial by the racial or ethnic groups that make up the majority of the population. The categories show the percentage population gap between the majority racial/ethnic group and the next largest racial/ethnic group. The more intense the color, the higher the percentage gap between the predominant racial/ethnic group

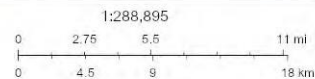
and the next largest racial/ethnic group. As expected based on the high percentage of Hispanic population (Table D-1), all Imperial County cities have a high concentration of Hispanic majority census tracts. Overall, Hispanic population predominates the County.

Figure D-2: Minority Concentration by Block Group - Imperial County



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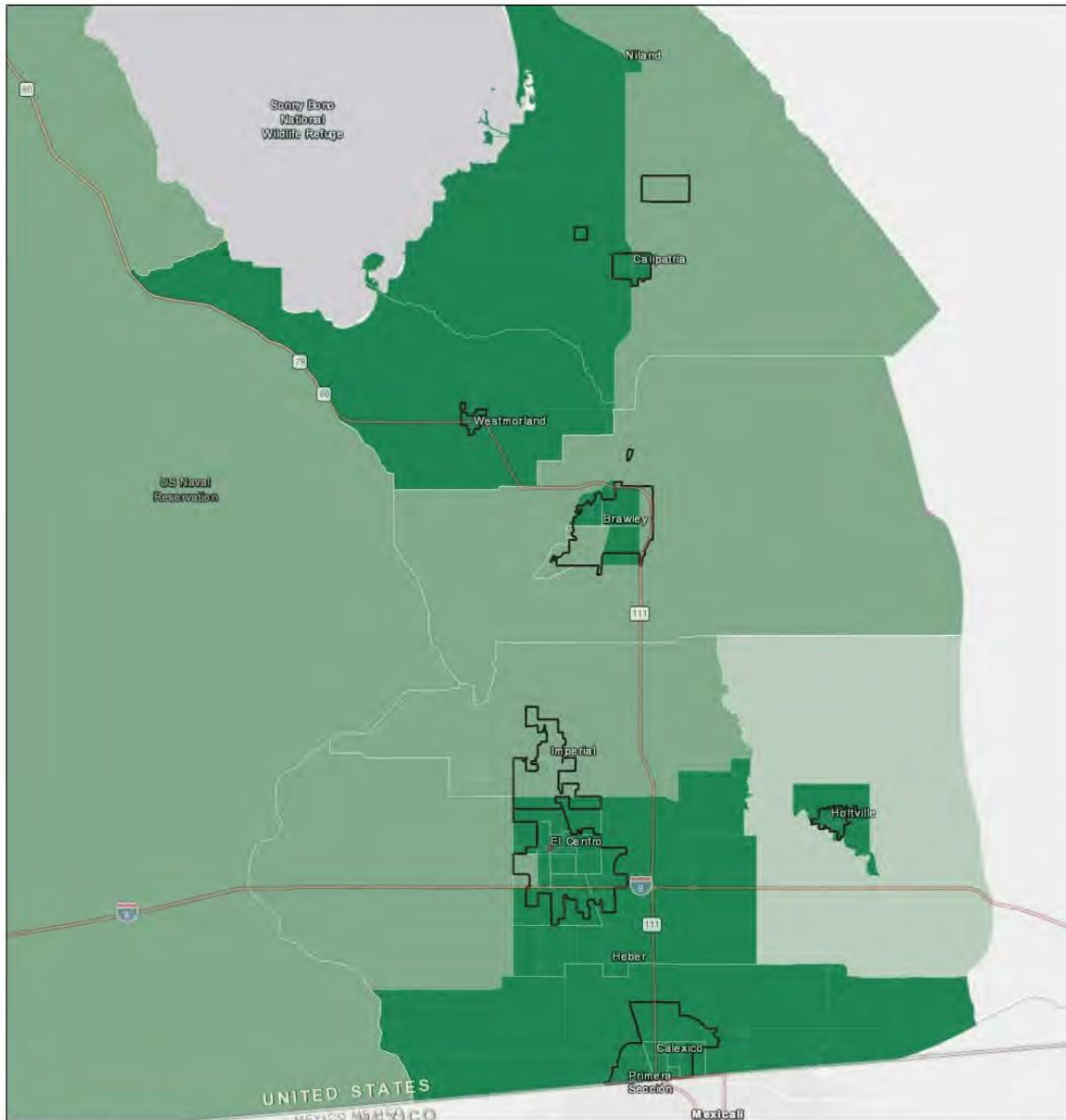
- City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group
 - 41 - 60%
 - 61 - 80%
 - > 81%





Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
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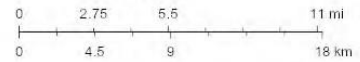
Figure D-3: Racial and Ethnic Majorities by Census Tract - Imperial County



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-  City/Town Boundaries
- (R) Predominant Population - Hispanic Majority Tracts
-  Slim (gap < 10%)
-  Sizeable (gap 10% - 50%)
-  Predominant (gap > 50%)

1:288,895



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CA HCD

Local Trends

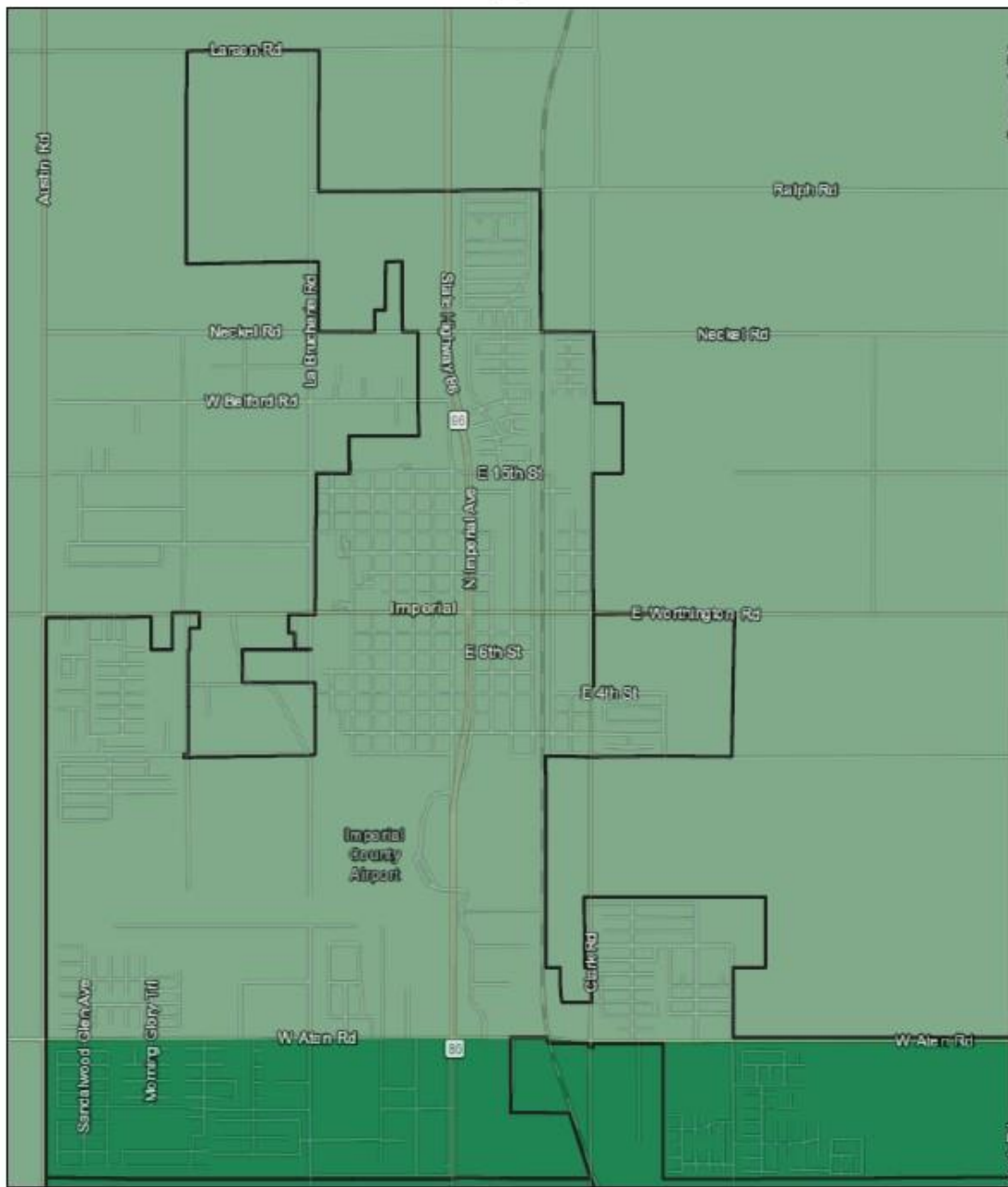
Like the County, Imperial's population is mostly Hispanic (78 percent, Table D- 1). As shown in Table D- 3, White population has decreased by almost one and a half percent between 2010 and 2019, while the Hispanic/Latino has grown by almost three percent. Most other races did not change in their share of the population with the percentage of black population decreasing by 0.8 percent and the Asian population increasing only by 0.7 percent in the past decade.

Figure D-4 shows that the Hispanic majority population is sizeable throughout the entire City. Only the census tracts in the lower portion of the City has a slightly higher concentration of Hispanic population. Figure D-5 shows that minority concentrations make up more than 81 percent of all census tracts in the City.

Table D-3: Race/Ethnicity Composition Changes (2010-2019)

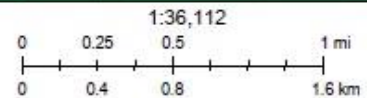
	2010	2019	% change
White alone	18.5%	17.1%	-1.4%
Black or African American alone	2.5%	1.7%	-0.8%
American Indian and Alaska Native alone	0.0%	0.3%	0.3%
Asian alone	1.6%	2.3%	0.7%
Native Hawaiian and Other Pacific Islander alone	0.1%	0.0%	-0.1%
Other	0.2%	0.2%	0.0%
Hispanic or Latino:	75.1%	78.0%	2.9%
Total Population	15,782	17,454	10.6%
Source: ACS 2010-2014, 2015-2019 estimates			

Figure D-4: Racial and Ethnic Majorities by Census Tract- City of Imperial



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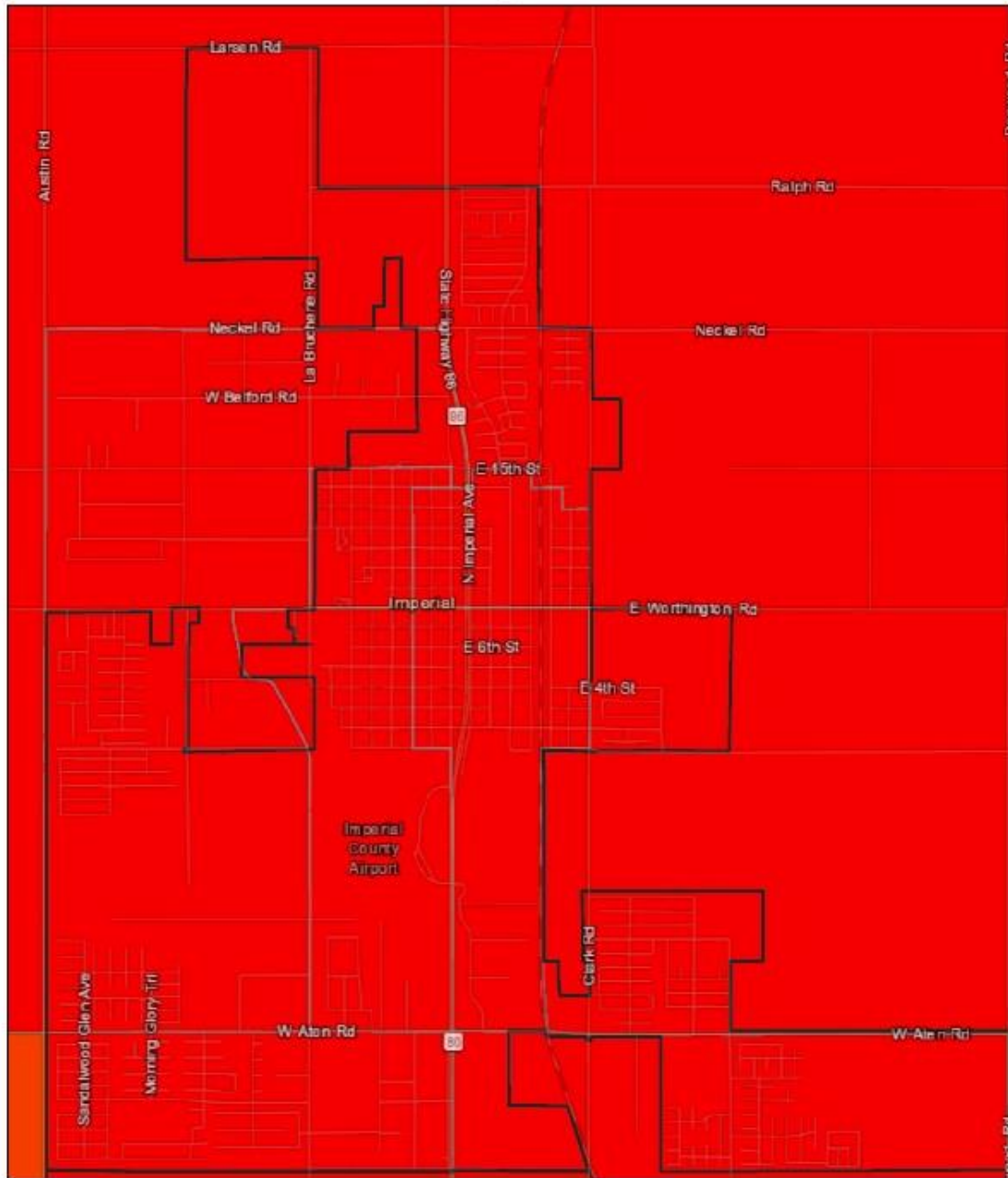
-  City/Town Boundaries
- (R) Predominant Population - Hispanic Majority Tracts
-  Sizeable (gap 10% – 50%)
-  Predominant (gap > 50%)



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Figure D-5: Minority Concentration - City of Imperial



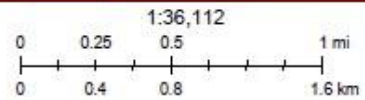
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

61 - 80%

> 81%



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Distribution of RHNA Units by Percent Minority Concentration

As part of the AFFH analysis, the City must show sites identified in the inventory were selected a manner that is consistent with its duty to affirmatively further fair housing (AFFH). This involves an analysis of whether the identified sites serve the purpose of replacing segregated living patterns with integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

As shown in Figure D-4, the minority population in all census block groups of the City is over 81 percent. Therefore, when compared to RHNA unit distribution in Figure D-1, there are no segregated living patterns because 100 percent of all RHNA units are located in census tracts with over 81 percent racial/ethnic minorities.

Persons with Disabilities

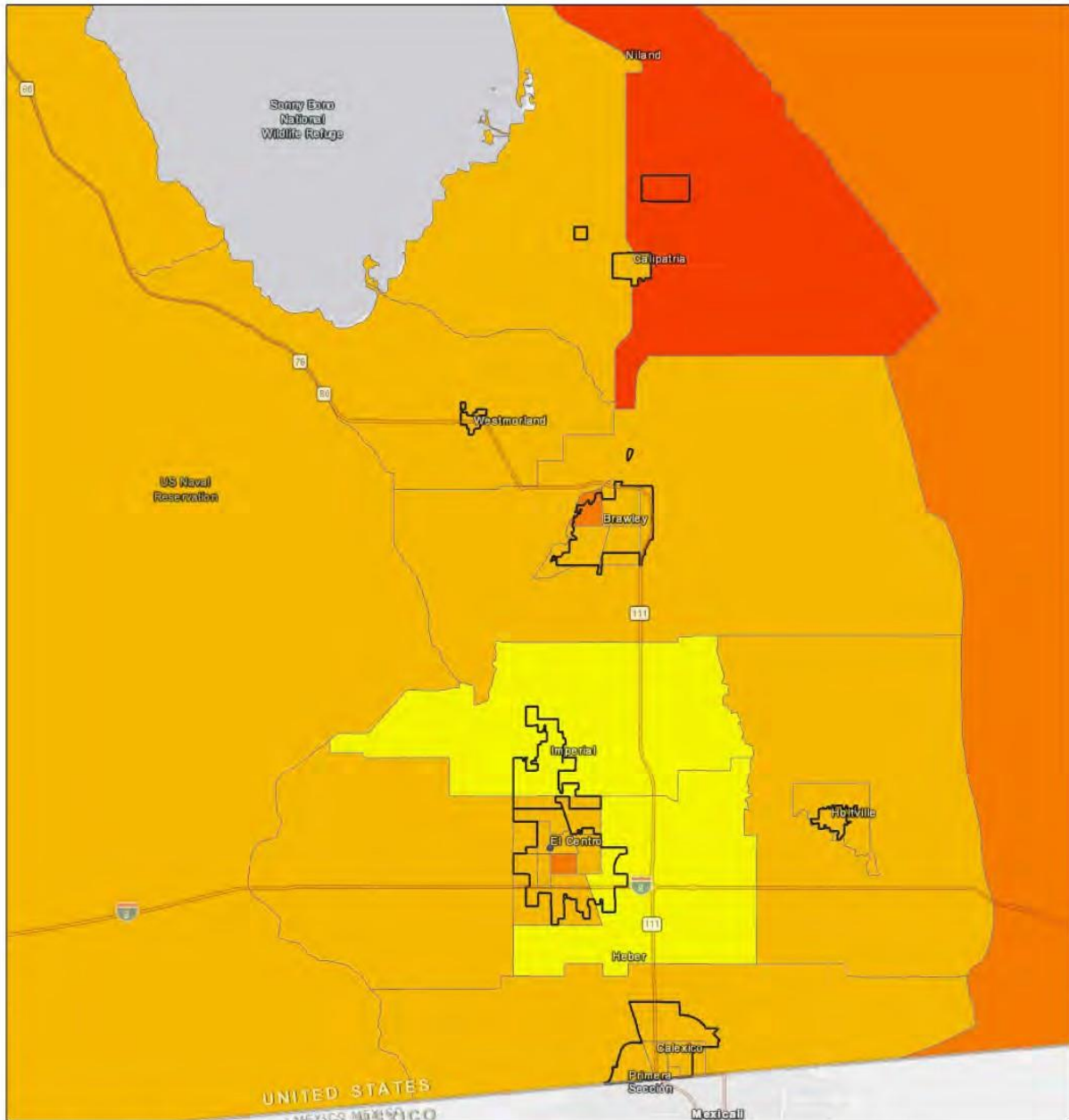
Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trends

Imperial County has a higher share of population with disabilities (14.4 percent) compared to the state (10.6 percent) and the nearby Los Angeles and San Diego counties (10 percent). According to the 2015-2019 ACS, jurisdictions in the County have proportions of population with disability ranging from 7.8 percent in Imperial to 17 percent in Brawley.

Figure D-6 shows the population with disabilities census tracts in Calipatria (where over 40 percent of the population has a disability) followed by one census tract in Brawley and El Centro each (where between 20 and 30 percent of the population has a disability). For most census tracts in the region, about 10 to 20 percent of the population has a disability. Only a few census tracts in the region, in Imperial and surrounding El Centro, have a population with disability less than 10 percent.

Figure D-6: Population with Disabilities- Region



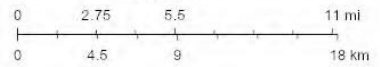
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City/Town Boundaries

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

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%

1:288,895



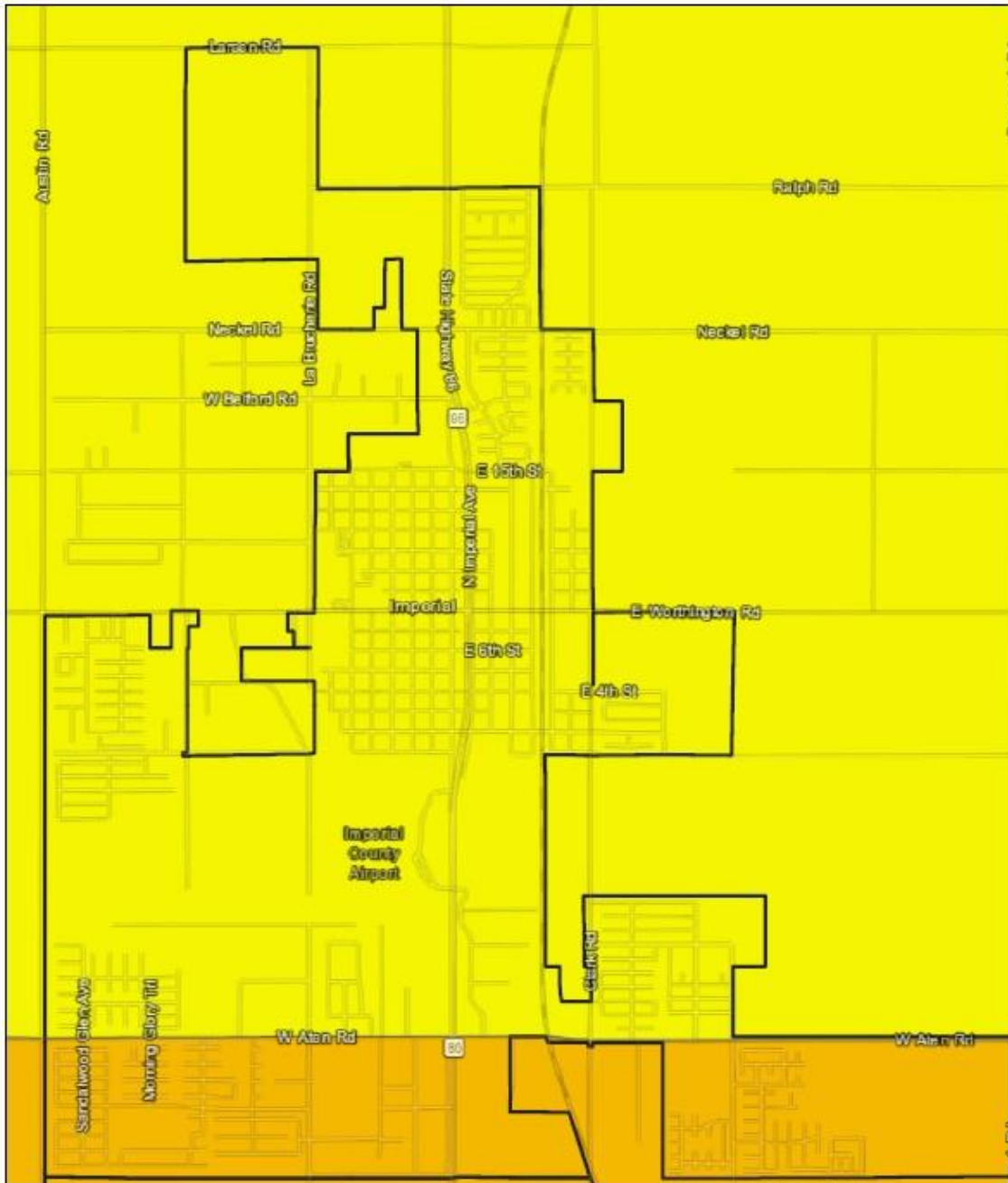
Local Trends

Imperial has the lowest proportion of population with a disability (7.8 percent) in the County significantly lower than Brawley (17.4 percent) and Holtville (16.2 percent). The City also has a lower population of persons with disabilities than the County (14.4 percent). Within the City, the highest concentration of population with disabilities is in the census tract along the southern boundary of the City. In this census tract, between 10 and 20 percent of the population has a disability.

Distribution of RHNA by % Population with Disabilities

As shown in Figure D-7, most census tracts in the City have a population of less than 10 percent of persons with disabilities. Since this concentrated of persons with disabilities is most common, most RHNA units are in tracts where the population of persons with disabilities is less than 10 percent. However, when compared with RHNA unit distribution in Figure D-1, the RHNA units located south of Aten Road are within the census tracts where the population of persons with disabilities ranges from 10 to 20 percent. Additionally, the lower income RHNA units are all within areas of the higher range of persons with disabilities with additional units being in the mixed income (moderate and above moderate) category.

Figure D-7: Concentration of Persons with Disability



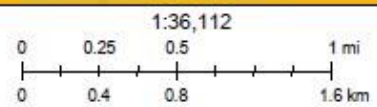
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City/Town Boundaries

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

< 10%

10% - 20%



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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 household. 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 an apartment complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law.

Regional Trends

According to the 2015-2019 ACS (Table D-4), 41 percent of households in Imperial County have children under the age of 18. This share is higher than the share of households with children observed in the state (34 percent) and in Los Angeles and San Diego County (33 percent for both). The percentage of households with children in Imperial County range from 41 in Westmorland to 51 percent in Imperial. Imperial County also has a higher percentage of female-headed households with children (62 percent) compared to the state (59 percent) and neighboring counties (55 percent in Los Angeles and 58 percent in San Diego County). Within Imperial County, over 75 percent of households have children in the cities of Brawley, Imperial, and Westmorland.

Table D-4: Household (HH) Types with Children- Region

	California	Los Angeles	San Diego	Imperial	El Centro	Brawley	Calexico	Calipatria	Holtville	Imperial	Westmorland
All HH	34.4 %	33.0%	33.1 %	41.6%	42.0 %	45.0%	46.4%	43.2 %	46.6%	50.5 %	41.3%
Married HH	47.0 %	47.4%	46.2 %	52.0%	51.5 %	53.3%	56.0%	51.8 %	67.9%	58.2 %	48.9%
Single Male-Headed HH	53.0 %	48.8%	53.4 %	50.3%	46.4 %	41.1%	58.9%	54.5 %	84.5%	66.4 %	72.7%
Single female-headed HH	58.5 %	54.8%	58.5 %	61.9%	59.3 %	75.4%	61.1%	62.1 %	51.0%	79.6 %	75.6%
Nonfamily	0.8 %	0.6%	0.7 %	1.1%	1.9 %	0.0%	2.6%	0.0 %	0.0%	0.0 %	0.0%
all HH	34.4 %	33.0%	33.1 %	41.6%	42.0 %	45.0%	46.4%	43.2 %	46.6%	50.5 %	41.3%
Source: ACS 2015-2019 5-year estimates											

Figure D-8 and Figure D-9 shows the distribution of children in married households and single female headed households in the region. Darker colors indicate a higher percentage of children in married-couple households or single female-headed households per tract. Most census tracts in major jurisdictions like Imperial, Holtville, and Calexico have between 20 and 40 percent of the children population in married-couple households. The highest concentration of children in married people households is found in a few tracts in El Centro. Many census tracts in the eastern and western county appear to have a high concentration of children in married households. It is likely that low population in these areas (which are mainly rural plots) skew the percentages. While children in married-households appear to be uniform across most of the County's jurisdictions, children in female headed households are more notably concentrated in El Centro and Brawley (Figure D- 9).

Figure D-8: Children in Married Households- Region

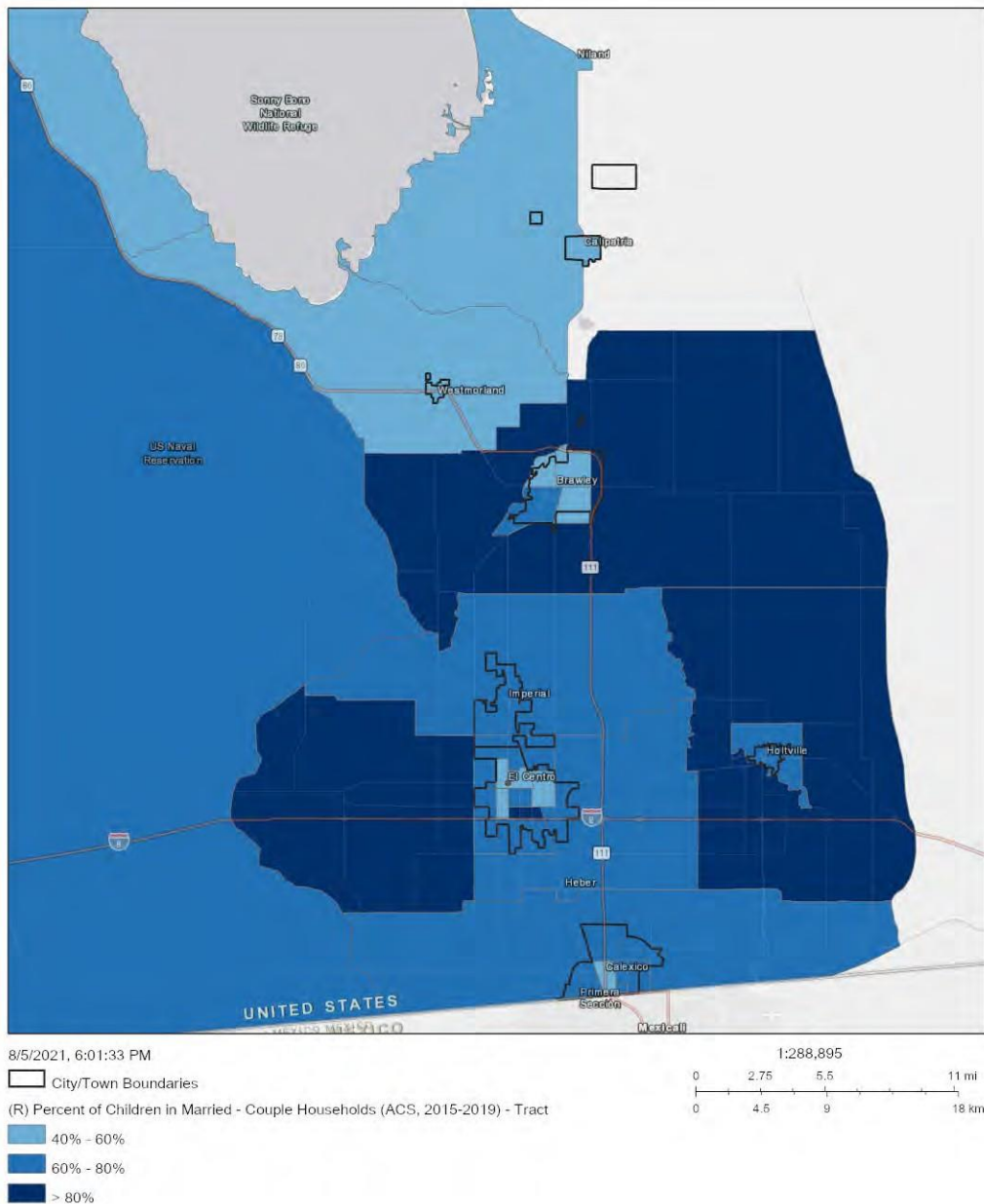
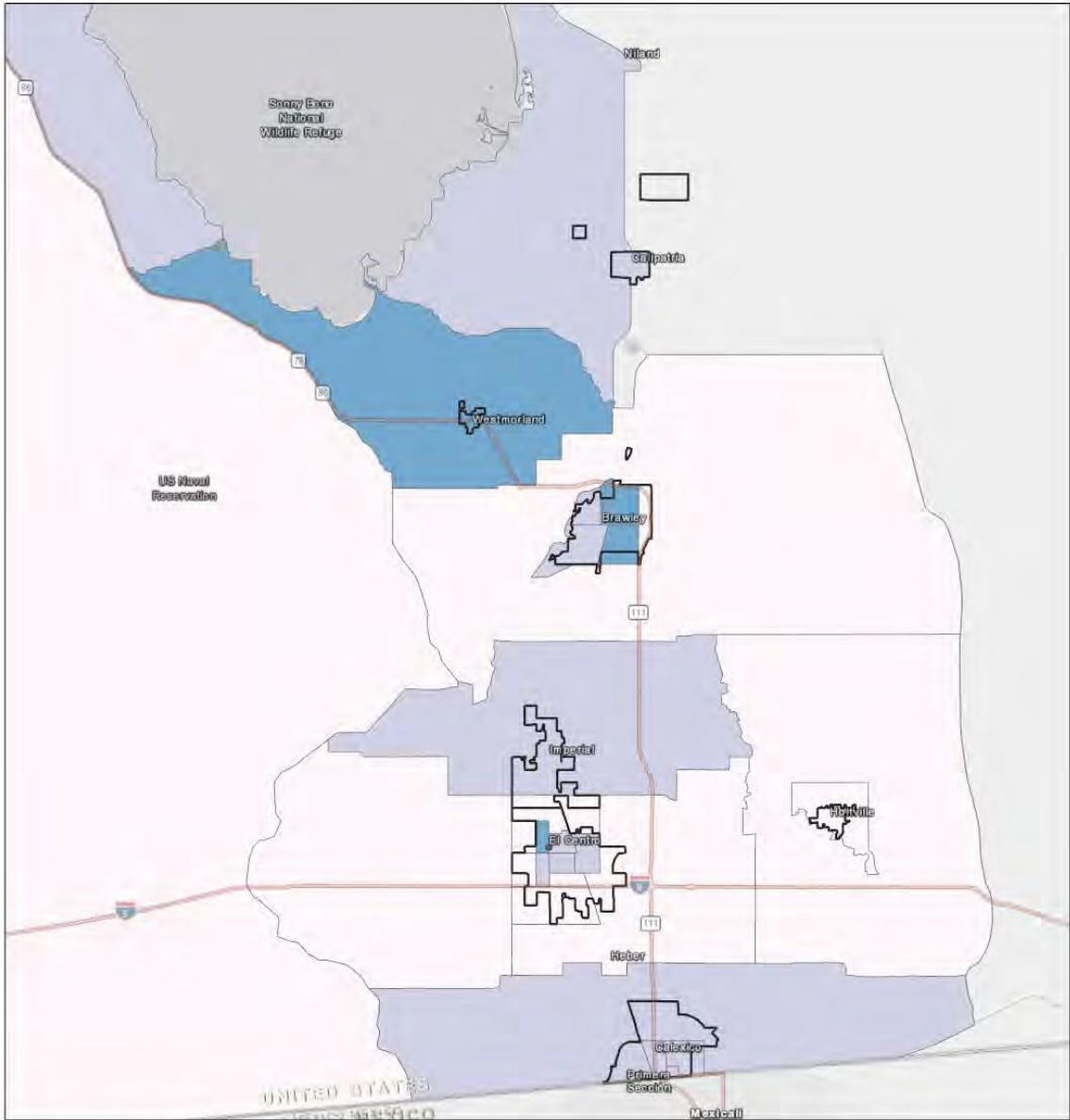


Figure D-9: Children in Single Female-Headed Households-Region



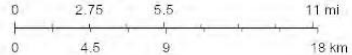
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City/Town Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

- ≤ 20%
- 20% - 40%
- 40% - 60%

1:288,895



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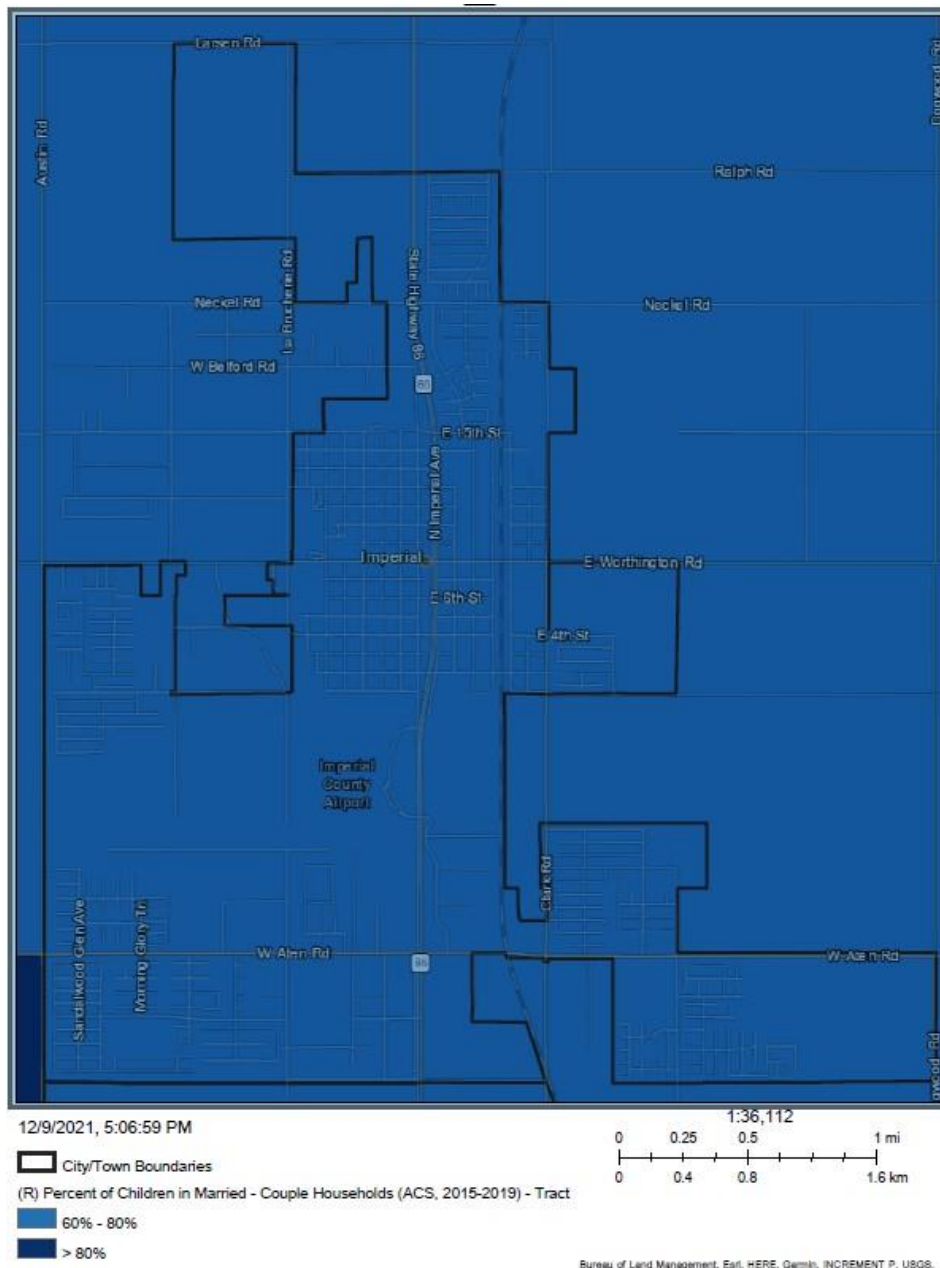
CA HCD

Local Trends

Approximately 51 percent of households in Imperial have children, higher than the surrounding jurisdictions of El Centro (42 percent), Calexico (46 percent), and Brawley (45 percent). According to the HCD AFFH map in Figure D-10, the entire City has a range of 60 to 80 percentage of children in married households.

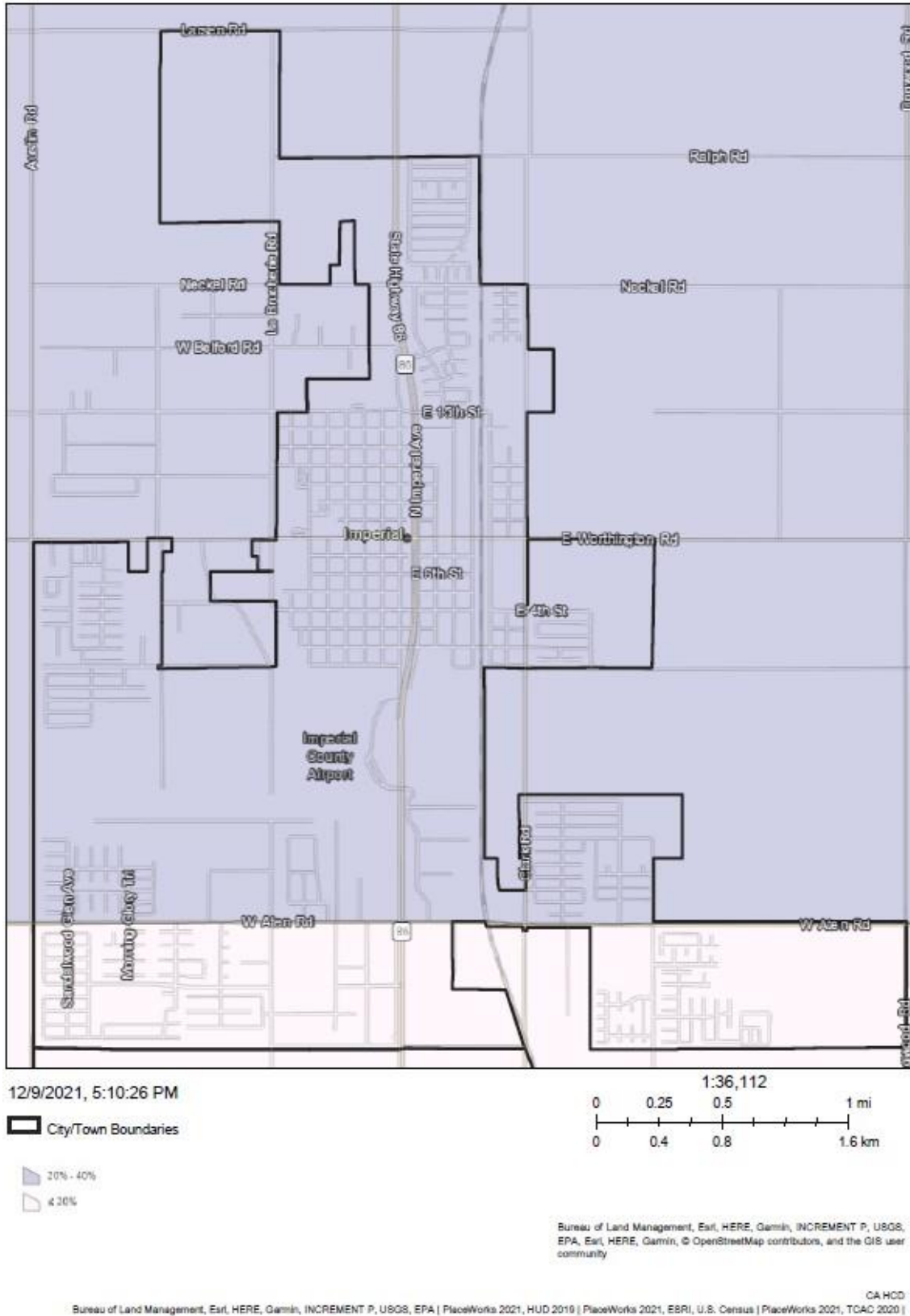
Figure D-11 shows that a majority of the City contains 20 to 40 percent of children in single female-headed households. South of Aten Road, the percentage of children in single female-headed households is less than 20 percent.

Figure D-10: Children in Married-Couple Households - City of Imperial



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Figure D-11: Children in Single Female-Headed Households- City of Imperial



Distribution of RHNA Units by Familial Status

As shown in Figure D-1, RHNA units are distributed throughout the City, with lower income units located at the southern most area of the City and above moderate income units along the western boundary in the central portion of the City. In terms of familial status, all RHNA units are in tracts that have between 60 and 80 percent of its children population in married households. Lower income units are in the southern portion of the City where the lowest concentration of children in single female-headed households are located.

Income Level

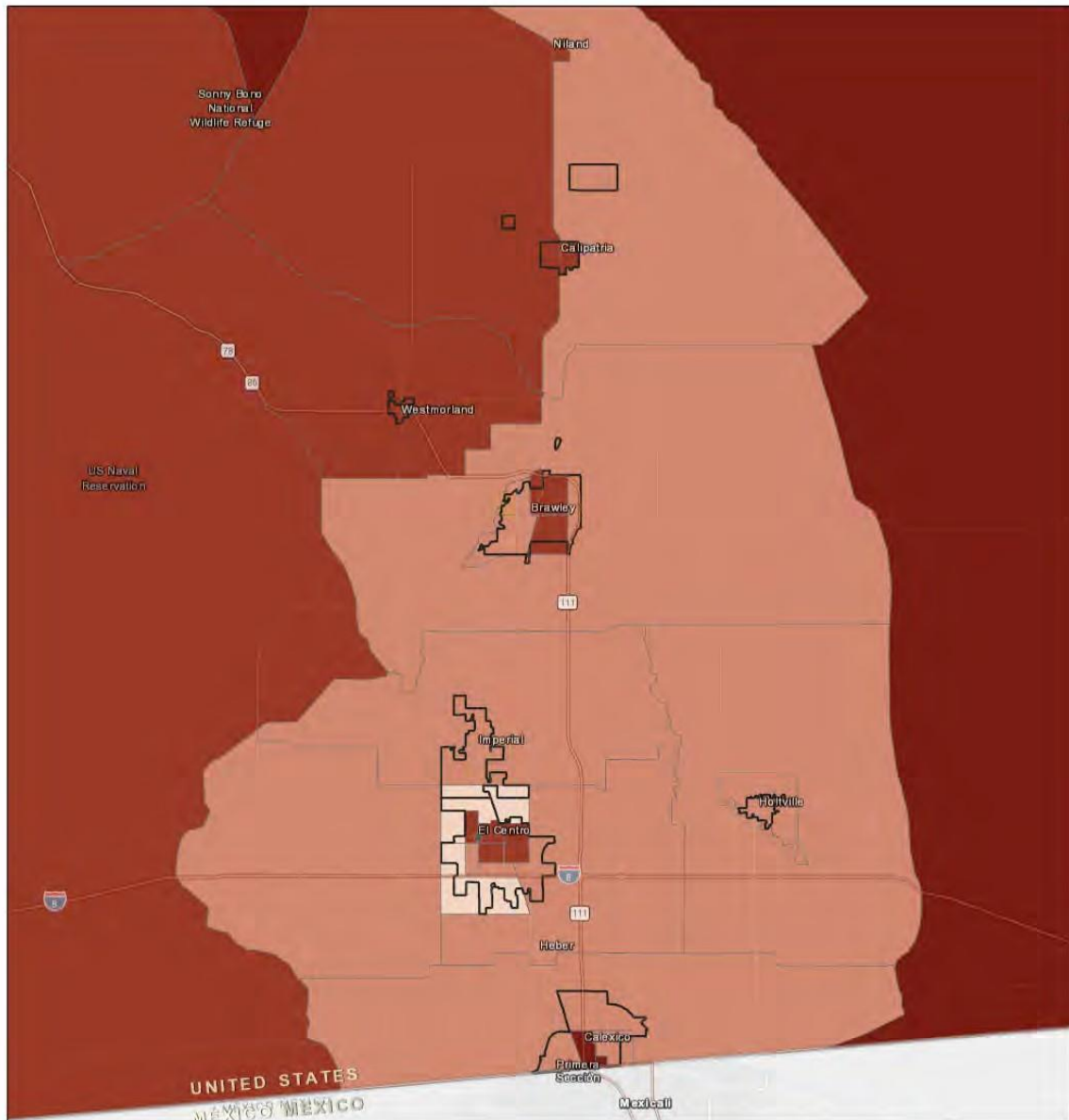
Household income is the key determinant of ability to pay for housing. For many households, their income is too limited to afford existing housing. A larger number of households have incomes too low to afford new housing, as new housing is usually more expensive than existing housing.

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. 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).

Regional Trends

According to 2013-2017 CHAS data, 49 percent of Imperial County's households earn low and moderate income. This is a higher percentage than observed in San Diego County (43 percent) and statewide (44 percent) but lower than Los Angeles County (52 percent). Figure D-12 shows that LMI population is concentrated in tracts within the major jurisdictions of the County. However, in the cities of Westmorland, Calipatria, and Holtville, between 50 and 75 percent of the population earns low and moderate incomes in all their tracts. In Brawley, El Centro, and Calexico, the percentage of LMI population per block group varies within the city boundaries, with the percentage of LMI populating ranging from less than 25 to over 80 percent.

Figure D-12: Low and Moderate Income Population – Region



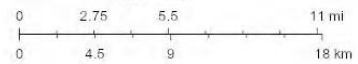
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City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Tract

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%

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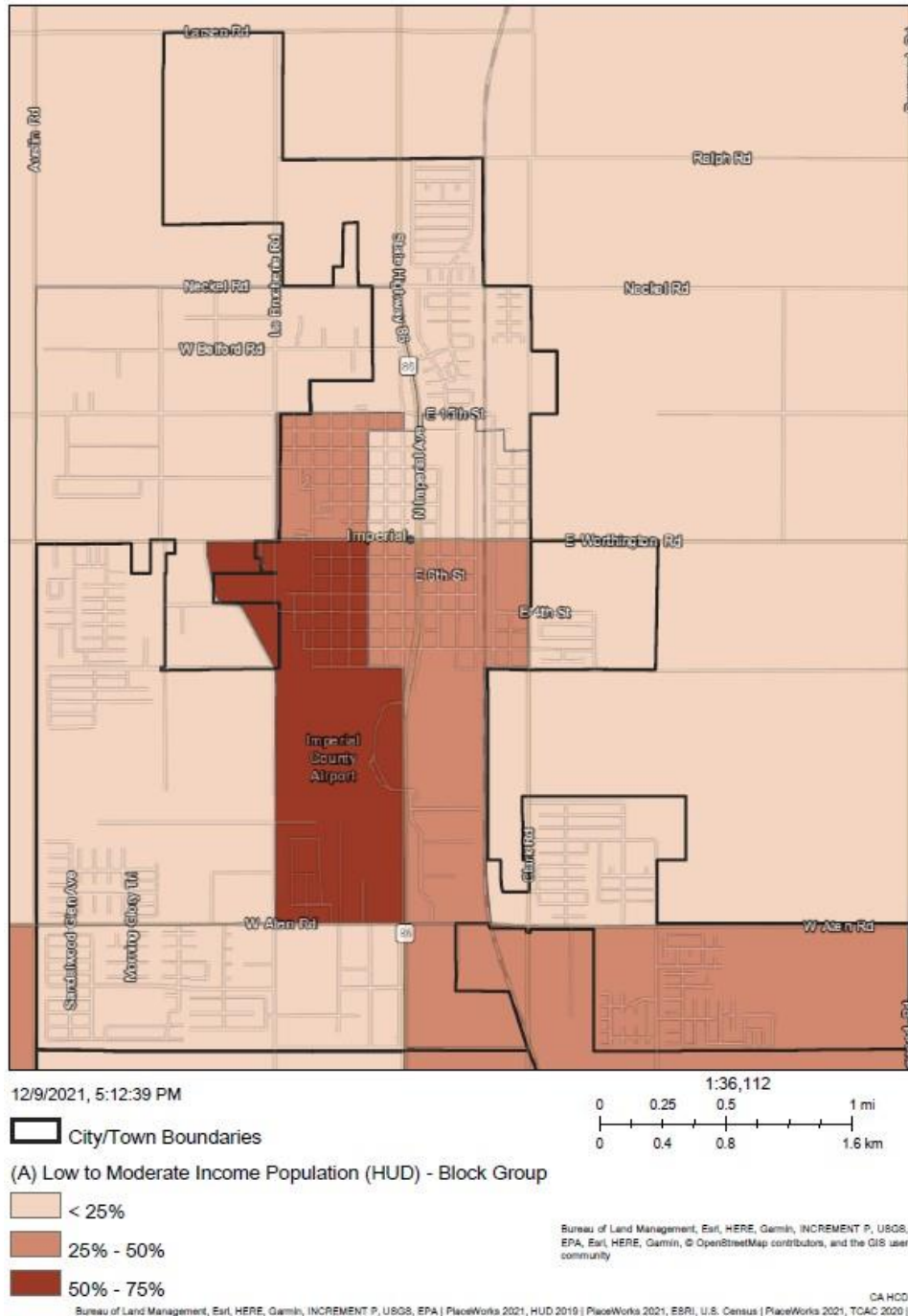
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CA HCD

Local Trends

The City's LMI population (11.4 percent) is significantly lower than the County's (48.8 percent). As seen in Figure D-13, the City of Imperial has one census tract with a high percentage (50 and 75 percent) of LMI population. This tract is located in the center of the City and includes the Imperial County Airport and surrounding streets to the north and south of the airport. Additionally, this tract is shown by the HUD AFFH Data Viewer database as having only 51% of the population that falls into the LMI category. Census tracts with the second highest concentration of LMI population (where 25 to 50 percent of the population earns low and moderate incomes) are concentrated in the central-eastern and southeastern tracts in the City.

Figure D-13: Low and Moderate Income Population- City of Imperial



Distribution of RHNA Units by % Low and Moderate Income Population

As shown in Figure D-1, RHNA units are distributed similarly in census tracts that have less than 25 percent LMI population and tracts that have 25 to 50 percent LMI population. This makes sense given that most census tracts fall into either one of these two categories. As shown in Figure D-1, in an effort to encourage mixed-income neighborhoods, a majority of lower income units are located in census tracts with the lowest percent of LMI persons (less than 25 percent). None of the RHNA units are sited in tracts with the highest concentration of LMI persons.

C. Racially and Ethnically Concentrated Areas

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

In an effort to identify racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and 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.

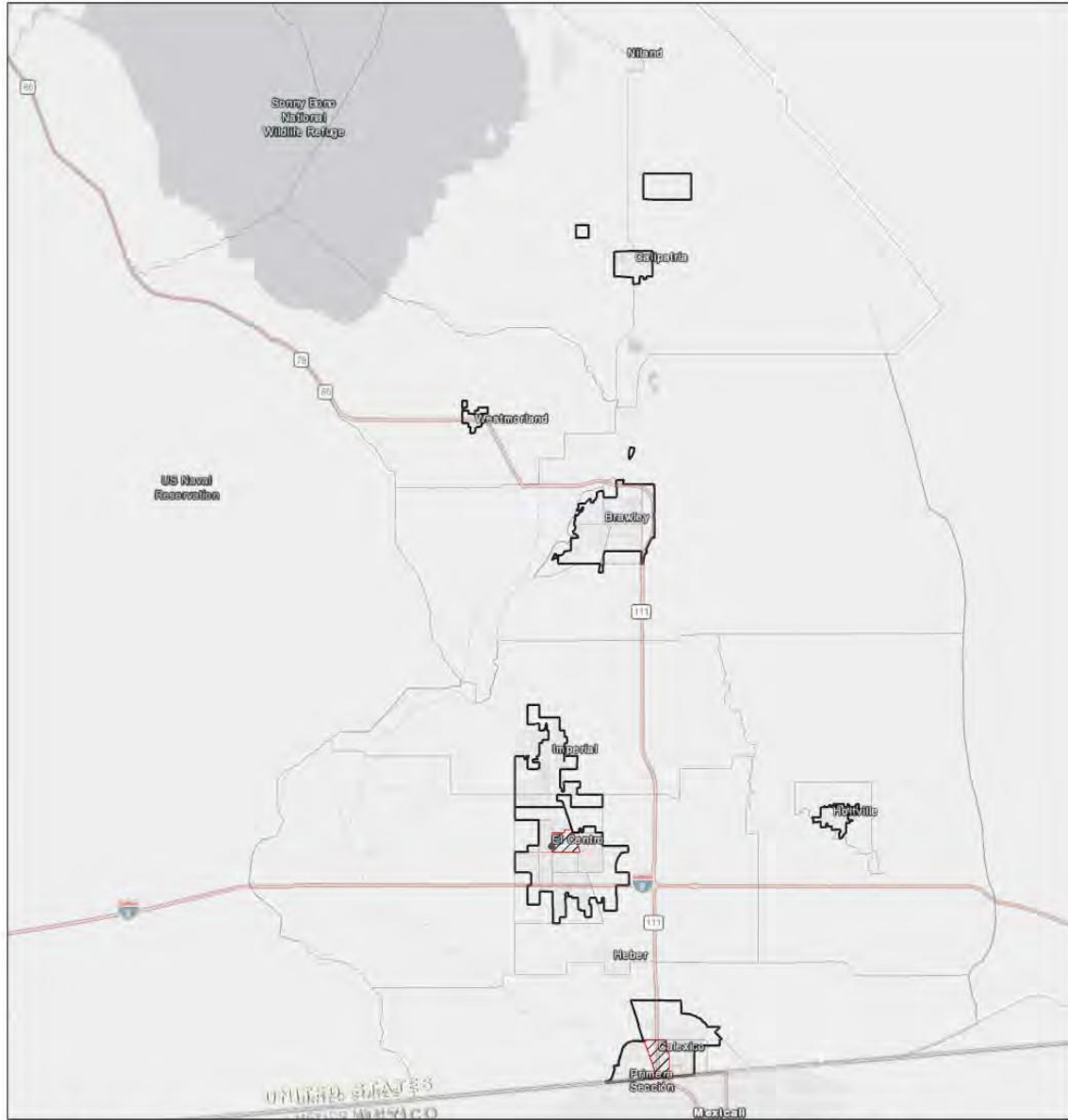
Regional Trends

There are two R/ECAPs located within the County- in Calexico and El Centro (Figure D-14).

Local Trends

There are no R/ECAP identified in the City of Imperial. Additionally, as shown in Figure D-15, there are no tracts identified as having poverty within the limits.

Figure D-14: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) - Region



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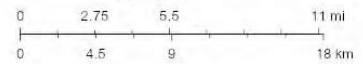
City/Town Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAPs" (HUD, 2009 - 2013) - Tract

0 - Not a R/ECAP

1 - R/ECAP

1:288,895

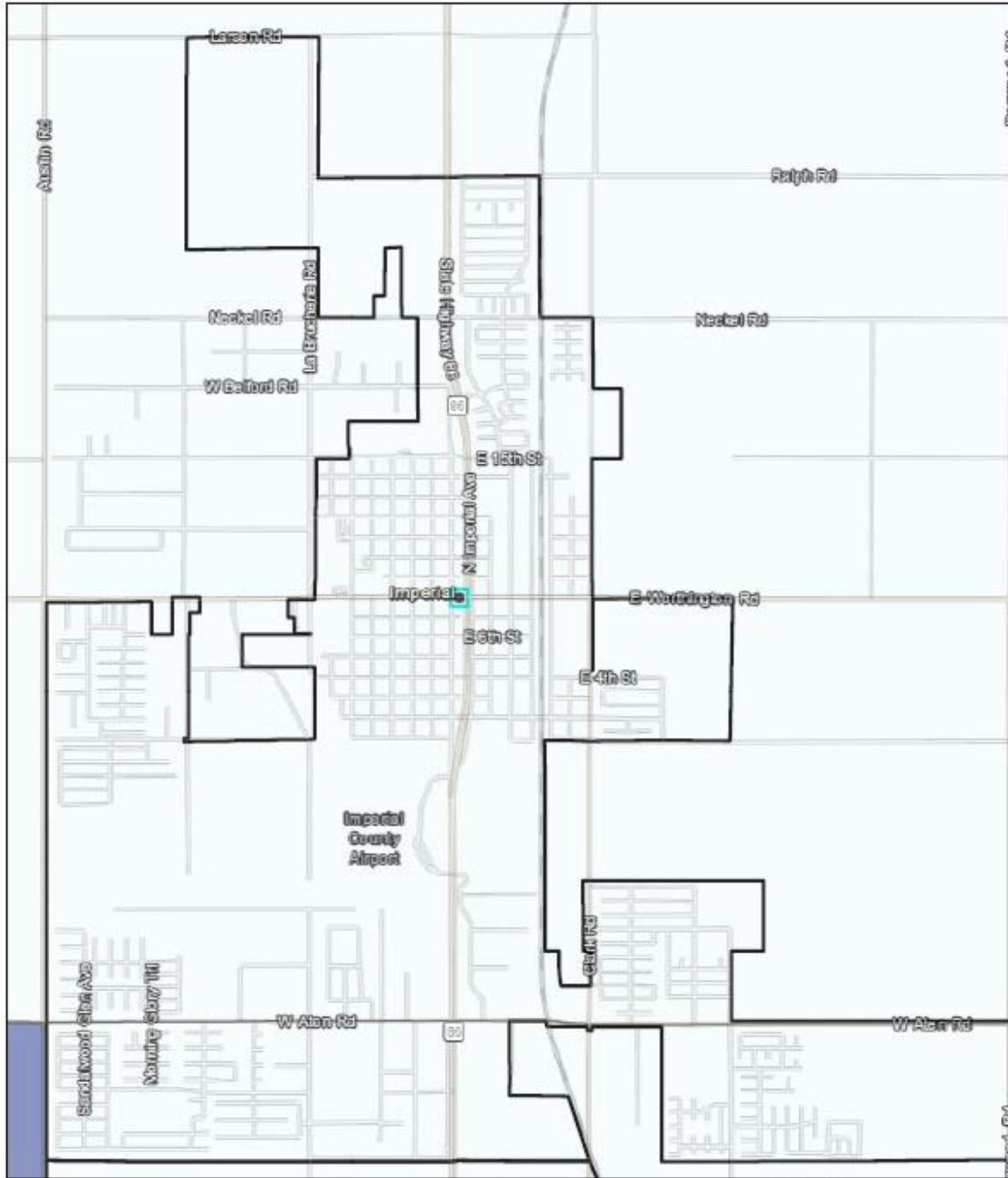


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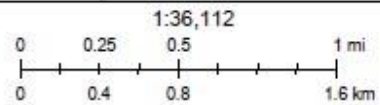
CA HCD

Figure D-15: Poverty Status by Tract- City of Imperial



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-  City/Town Boundaries
- (R) Poverty Status (ACS, 2015 - 2019) - Tract
-  < 10%
-  20% - 30%



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Racially Concentrated Areas of Affluence (RCAAs)

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, RCAAs are defined as affluent, White communities. 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.

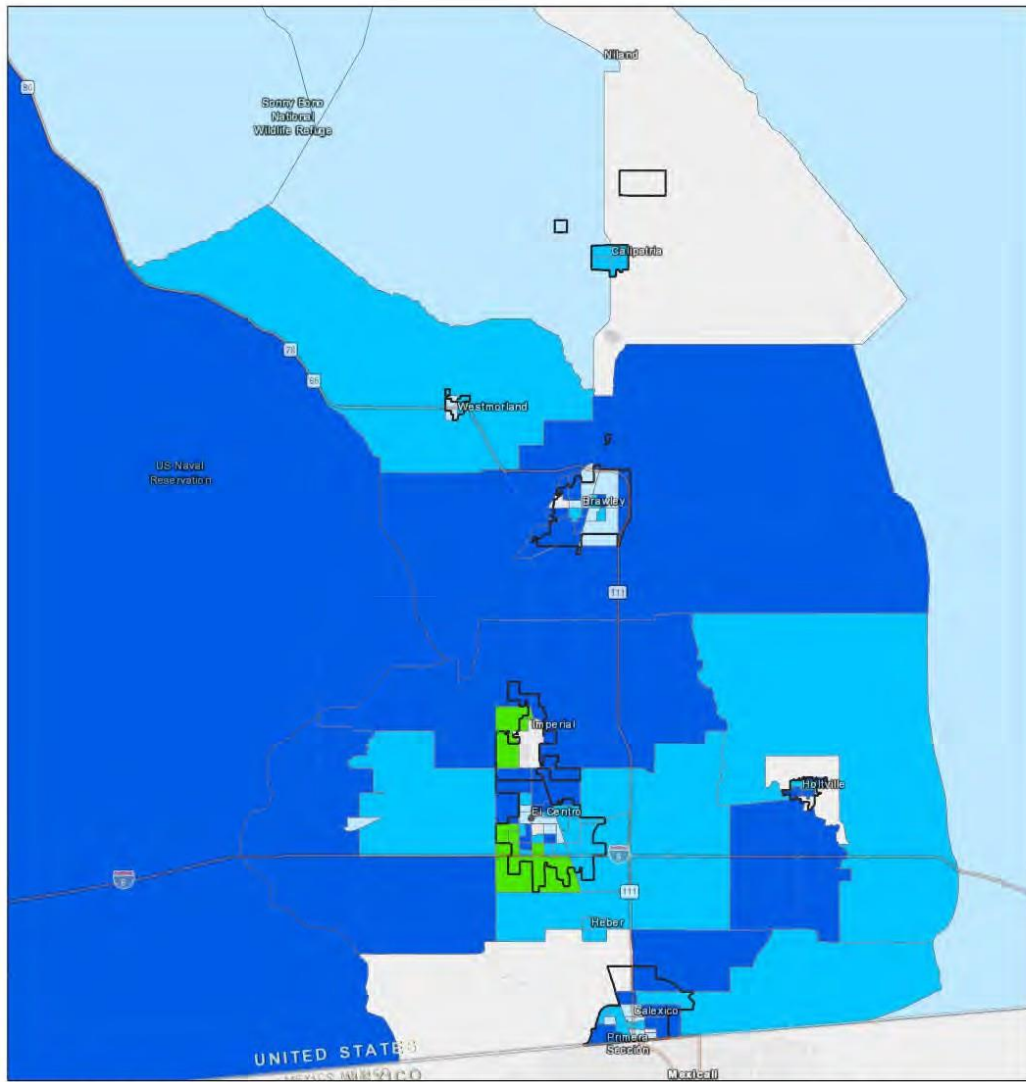
While HCD has created its own metric for RCAAs, at the time of this writing the map on the AFFH tool is not available. Thus, the definition of RCAAs used in this analysis is the definition used by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo: "RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016).

Regional Trends

Figure D-2 and Table D-1 show that Imperial County has a predominantly Hispanic population. Most block groups have at least 41 percent non-white minority population. This means that in block groups where White population has its highest shares (orange block groups, where minority is the lowest in the region and ranges from 41 to 60 percent), the maximum percentage white population in these block groups is only 59 percent.

In addition, only a few block groups in the region have a median income of over \$125,000 (Figure D-16). These block groups are located in the northwestern part of Imperial and the southwestern tracts of El Centro. These block groups are predominantly Hispanic/Latino.

Figure D-16: Median Income – Region



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City/Town Boundaries

(R) Median Income (ACS, 2015-2019) - Block Group

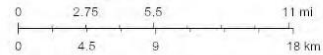
< \$30,000

< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000

1:288,895



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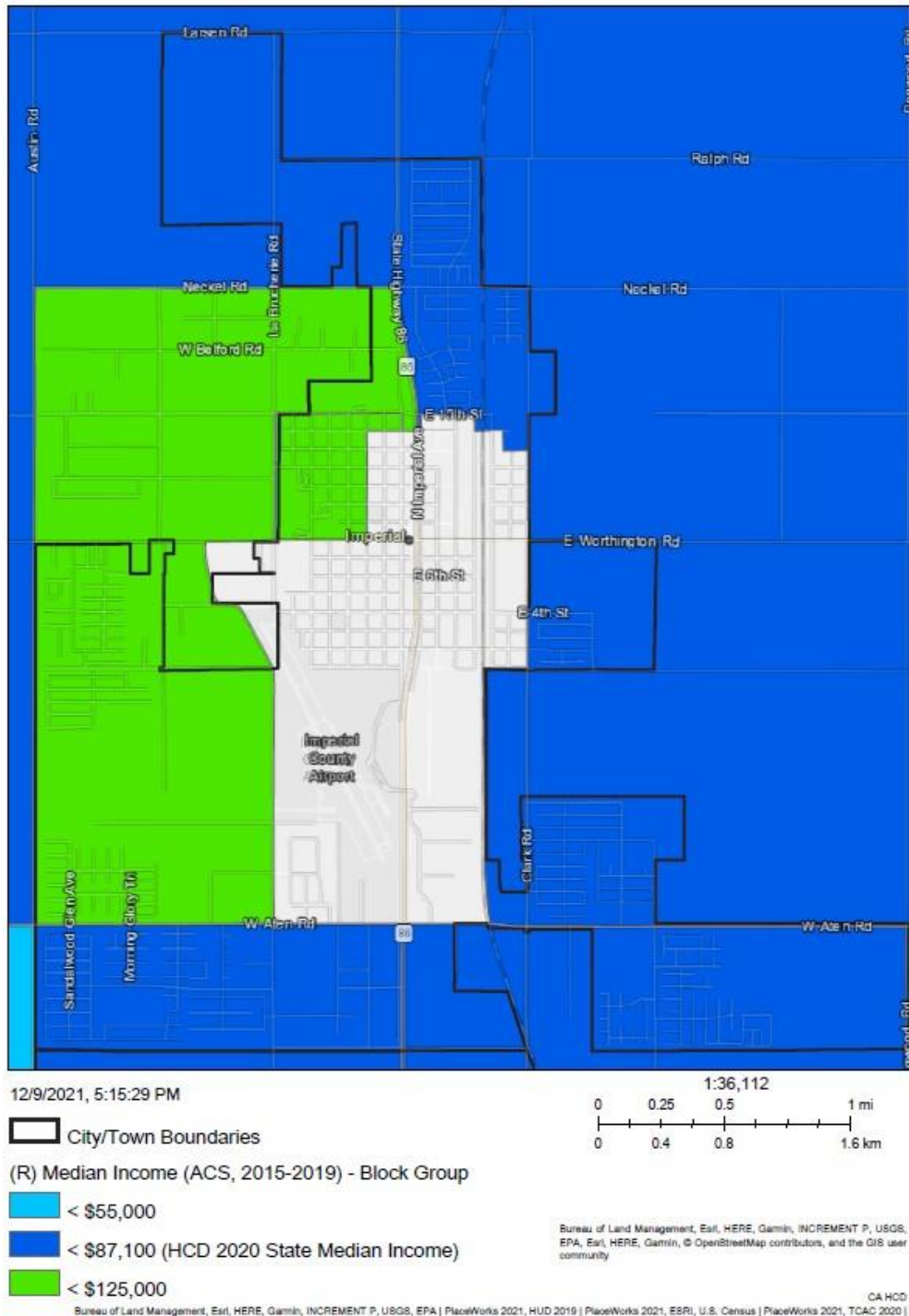
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CA HCD

Local Trends

As discussed previously in the Race/Ethnicity section, none of the block groups in the City have census tracts that have over 80 percent White population. The City does have block groups along its western border with median incomes over \$125,000 (Figure D- 17). However, no block group meets the definition of RCAs.

Figure D- 17: Median Income - City of Imperial



D. Access to Opportunities

Significant disparities in access to opportunity are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened 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 resource levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine 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-5 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

Table D-5: Domains and List of Indicators for Opportunity Maps

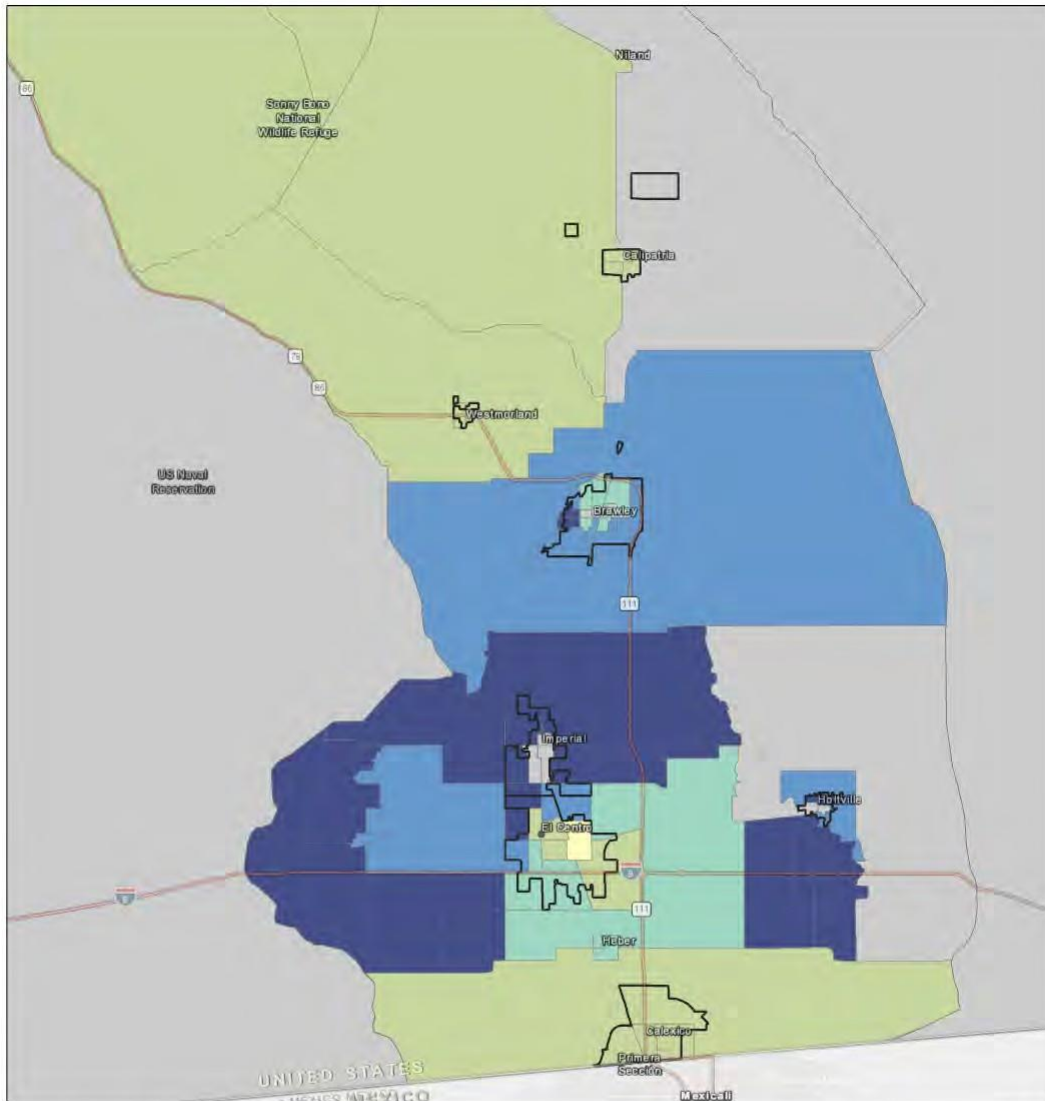
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020

Regional Trends

According to the 2021 TCAC/HCD opportunity area map, one census tract in the region is considered “high segregation and poverty” areas (Figure D- 18). This census tract is located in El Centro. TCAC maps categorize the level of resources in each census tract. Categorization is based on percentile rankings for census tracts within the region. Regionally, low resource areas (green) are concentrated in the southern tracts of County, along the US-Mexico border as well as some census tracts in El Centro. The middle tracts of the County, surrounding Imperial and Brawley have high resources. Census tracts between Calexico and El Centro have moderate resources.

Figure D-18: TCAC Composite Scores- Region



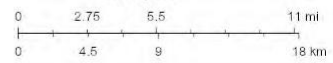
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

1:288,895



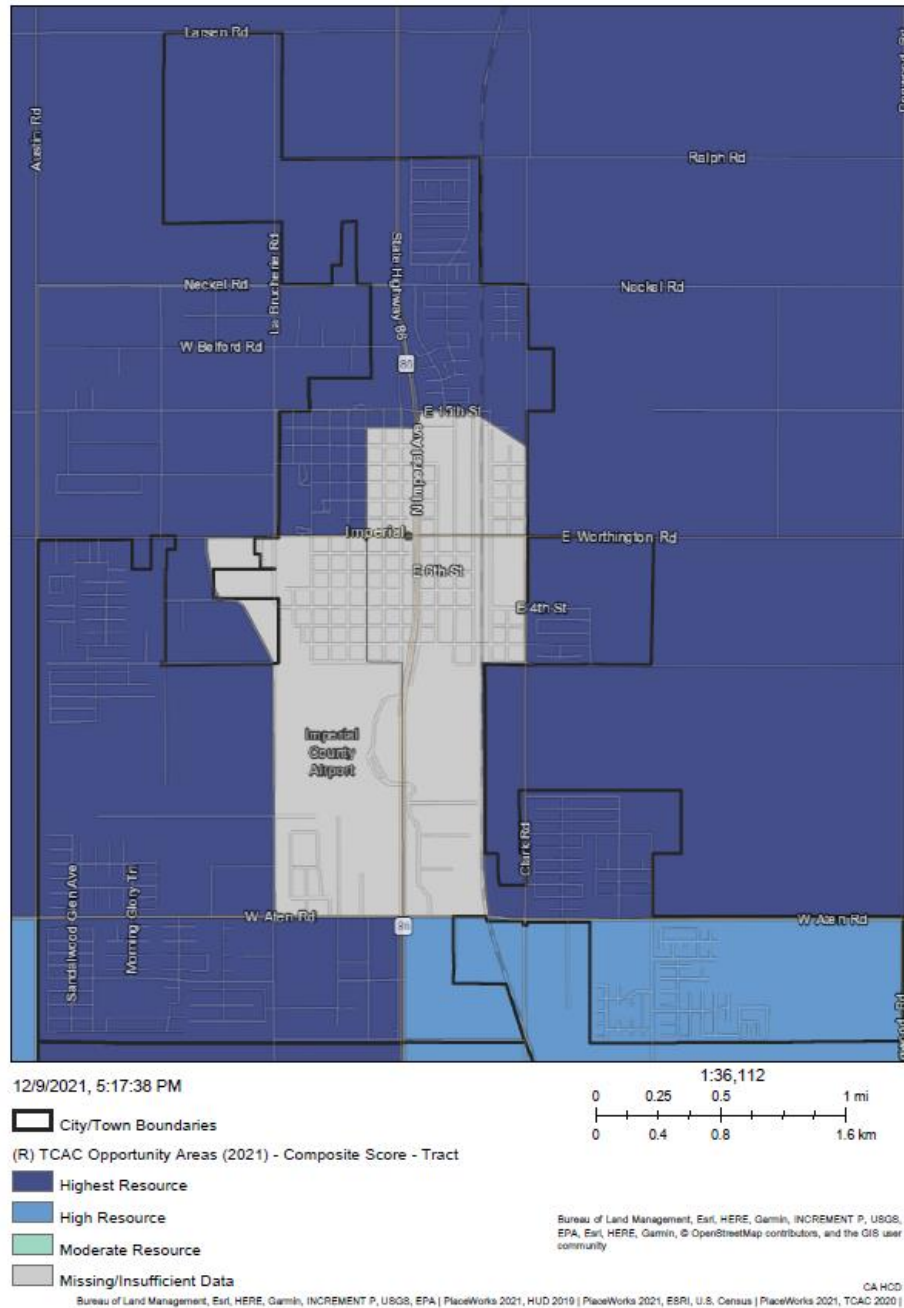
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Local Trends

According to the HCD/TCAC opportunity map (Figure D-19), Imperial is made up of mostly census tracts with the highest level of resources. As previously stated, the census tracts within the central portion of the City are missing or have insufficient data. Southeastern census tracts shared with El Centro scored lower but are still identified as in the high resource category.

Figure D-19: TCAC Opportunity Areas- City of Imperial



Distribution of RHNA Units by TCAC Opportunity Area

When Figure D-19 is compared with Figure D-1, it can be shown that a majority of Imperial's RHNA units are located in the highest resource areas with a portion of the RHNA units located in the southeastern part of the City still located in the high resource tracts.

Opportunity Indices

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Imperial residents' access to key opportunity assets in comparison to the County. Table D-6 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. *The higher the score, the higher the labor force participation and human capital in a neighborhood.*
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). *The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.*

Table D-6 below displays the opportunity indices by race and ethnicity for persons in El Centro and for the County. The City of Imperial does not have its own analysis; however, El Centro can act as a good indicator of conditions in the City.

Table D-6: Opportunity Indices by Race/Ethnicity- Imperial County and City of El Centro

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Imperial County							
Total Population							
White, Non-Hispanic	39.39	36.51	20.32	29.59	14.36	51.81	23.63
Black, Non-Hispanic	29.18	46.34	6.43	38.15	11.38	25.11	37.59
Hispanic	29.31	26.34	15.53	28.73	16.38	43.76	15.53
Asian or Pacific Islander, Non-Hispanic	45.75	34.32	26.53	29.13	14.35	46.96	15.99
Native American, Non-Hispanic	14.21	8.80	4.98	27.81	14.62	66.99	34.27
Population below federal poverty line							
White, Non-Hispanic	21.58	30.16	10.57	34.37	16.99	48.38	27.88
Black, Non-Hispanic	16.96	22.55	10.99	37.05	22.86	63.60	13.45
Hispanic	21.83	24.36	11.82	31.69	18.38	44.00	14.08
Asian or Pacific Islander, Non-Hispanic	16.01	17.46	10.41	38.95	27.22	60.26	10.87
Native American, Non-Hispanic	12.61	6.53	6.05	24.79	14.87	64.86	31.77
City of El Centro							
Total Population							
White, Non-Hispanic	43.93	31.91	31.89	37.14	20.94	62.43	9.62
Black, Non-Hispanic	21.30	21.27	17.52	37.18	24.37	70.52	9.38
Hispanic	28.29	25.89	21.01	39.90	24.12	67.81	9.40
Asian or Pacific Islander, Non-Hispanic	54.51	40.77	38.87	38.76	18.88	60.17	9.29
Native American, Non-Hispanic	23.65	22.13	18.24	43.53	26.92	66.03	9.57
Population below federal poverty line							
White, Non-Hispanic	17.89	13.18	23.61	46.02	28.26	66.66	9.34
Black, Non-Hispanic	12.27	12.09	16.53	37.24	26.82	72.54	9.25
Hispanic	17.00	13.65	20.76	41.01	26.45	70.66	9.36
Asian or Pacific Islander, Non-Hispanic	8.56	7.67	16.48	45.02	32.74	70.87	9.16
Native American, Non-Hispanic	16.74	16.47	17.55	32.10	22.89	71.54	9.40

Note: American Community Survey Data are based on a sample and are subject to sampling variability. See page 45 for index score meanings. Table is comparing the total Imperial County and El Centro population, by race/ethnicity, to the County and City population living below the federal poverty line, also by race/ethnicity.

Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

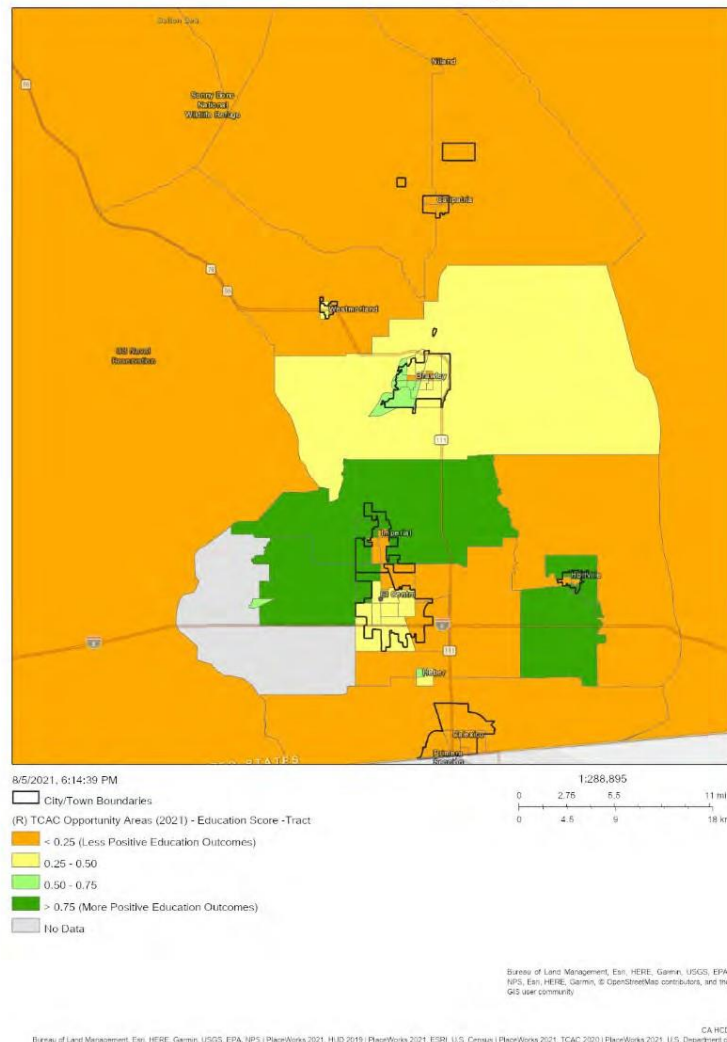
Education

Regional Trends

School proficiency scores are indicators of school system quality, with higher scores indicating higher school quality. In Imperial County, White, Black, and Asian residents have access to better schools (scores 46 to 34, with Black residents scoring highest) compared to Hispanic and Native American residents (scored 26 and nine, respectively). Native American residents had the lowest school proficiency index, almost five times lower than blacks and four times lower than White and Asian residents. For residents living below the federal poverty line, index scores decreased for all races, but decreased the least for Hispanic (two points), Native American (two points), and White (six points) residents. Indices for Black and Asian residents living in poverty decreased by over 17 points.

The HCD/TCAC education scores for the region show the distribution of education quality based on education outcomes (Figure D-20). Lower education scores are found in Brawley and surrounding areas as well as El Centro and Heber. Higher education scores are prominent in the edges of and surrounding areas of the cities of Imperial and Holtville.

Figure D-20: TCAC Education Scores- Region



Local Trends

Greatschools.org is a non-profit organization that rates schools across the United States. The Great Schools Summary Rating calculation is based on four ratings: Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average”, 5-6 indicate “average”, and 7-10 are “above average.” Figure D-21 shows that most of Imperial’s elementary, middle, and high schools scored in the average range. Only one school (Imperial High) in the center of the city scored as above average. These average scores correspond with the TCAC’s Education Score map for the City on Figure D-22. Approximately half of the city’s census tracts had higher education scores (more than 0.75 out of one), with the central and southeastern portions of the City receiving scores that are less positive outcomes.

Figure D-21: GreatSchools Ratings

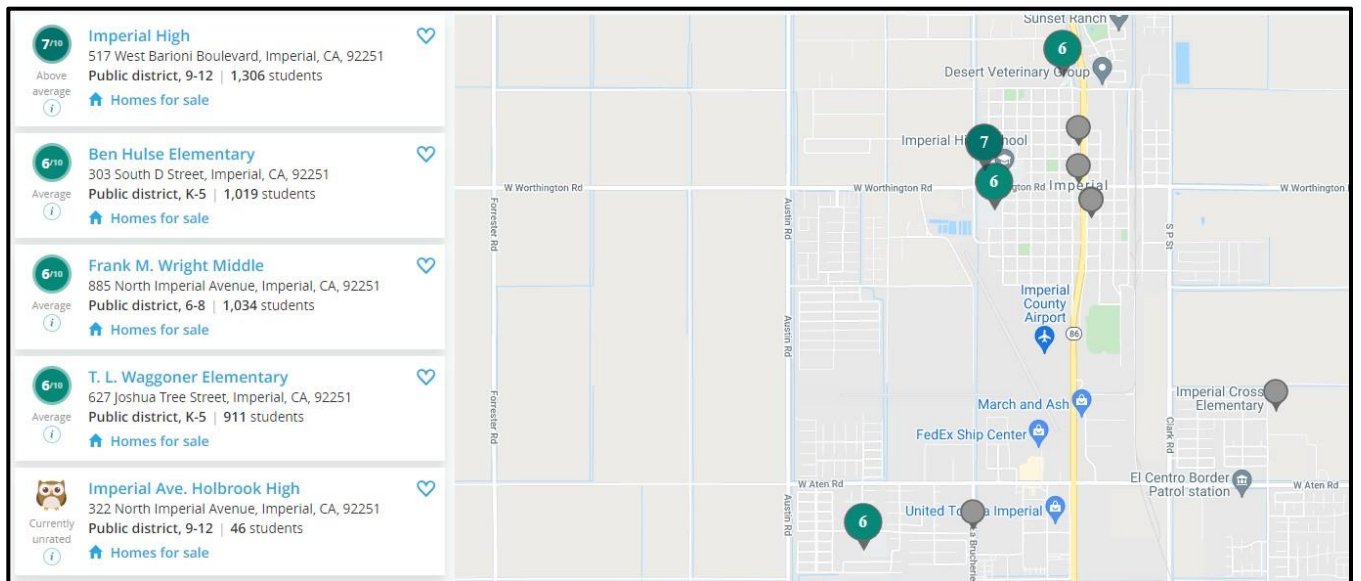
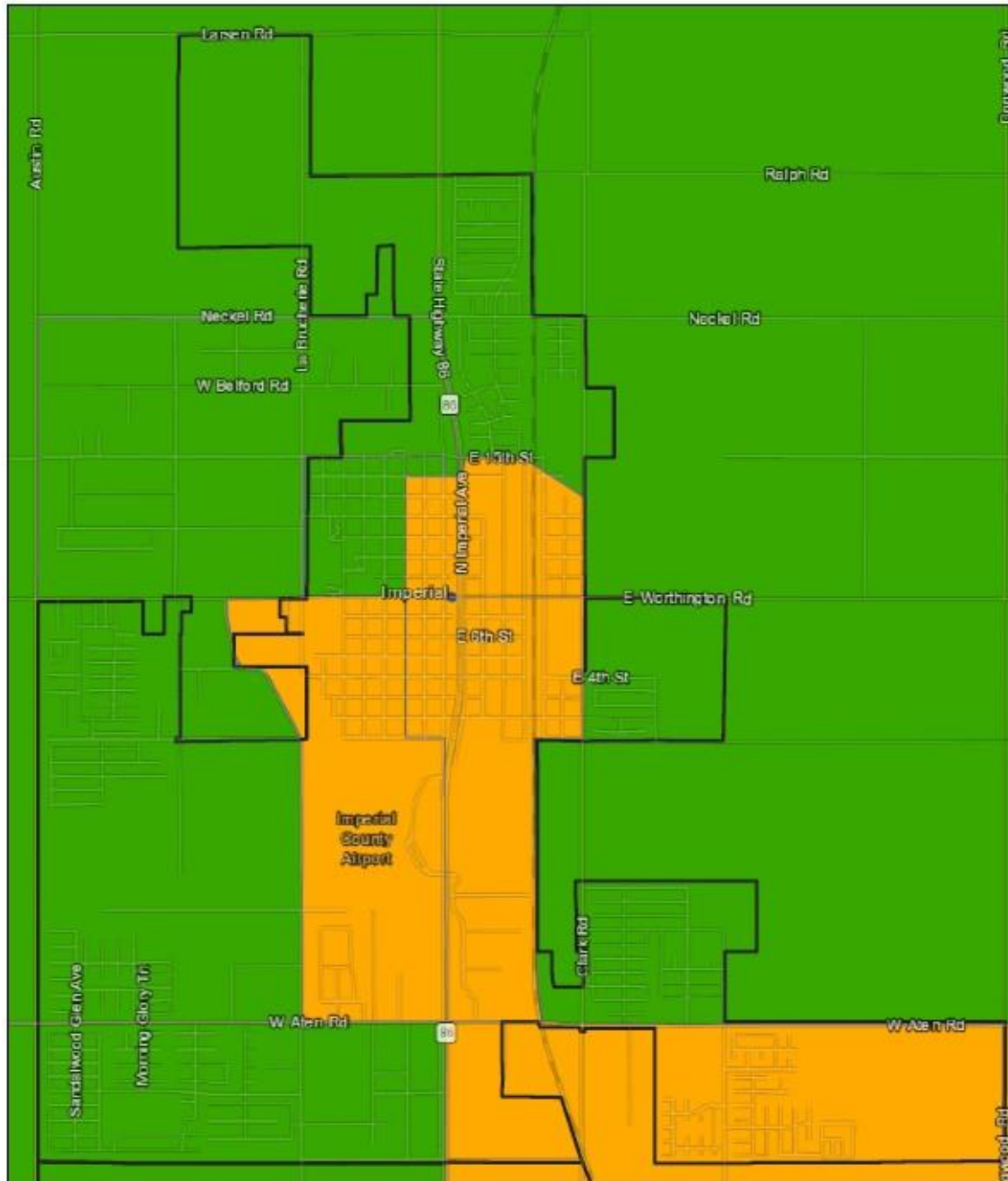


Figure D- 22: TCAC Education Score- City of Imperial



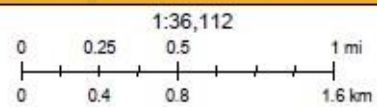
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

< 0.25 (Less Positive Education Outcomes)

> 0.75 (More Positive Education Outcomes)



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Transportation

Regional Trends

HUD's opportunity indicators have two categories to describe transportation- transit index and low transportation cost. In the County, transit index scores ranged from 28 to 38, with White, Hispanic, Asian, and Native American residents scoring similarly and Black resident scoring highest. For residents living below the poverty line, the scores had a similar but lower range from 25 for Native American residents to 37 for Black residents. Regardless of income, White residents had higher scores.

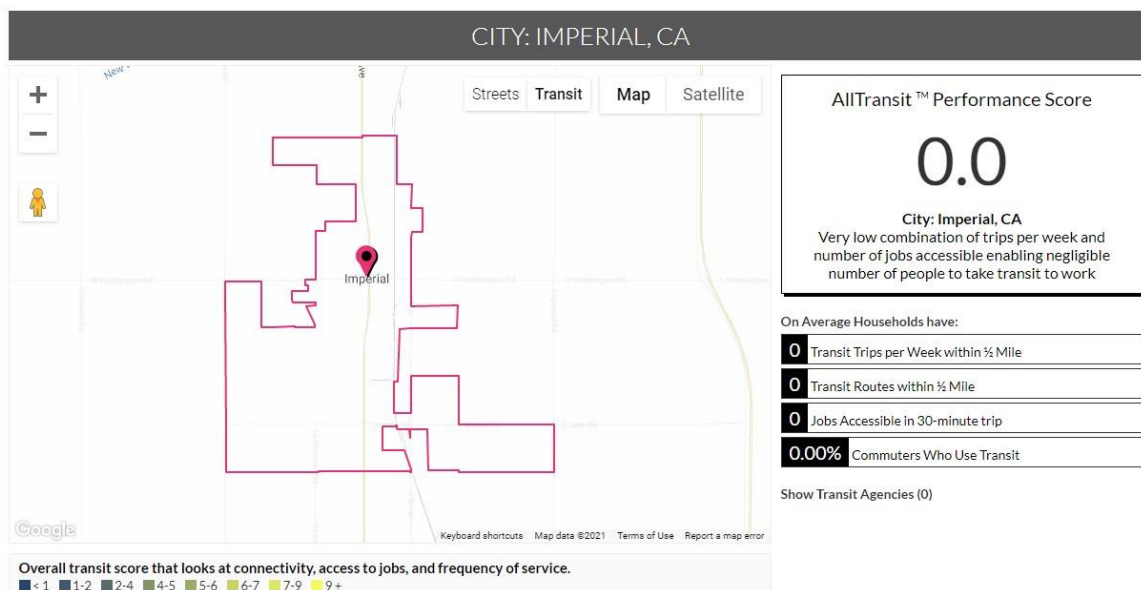
Low transportation cost scores had a small range from 11 to 16 across all races and were slightly higher for residents living below the poverty line (range 15 to 27). The total Hispanic population had the highest low transportation costs but Hispanics living in poverty had the among the lowest. Considering that a higher transit index score indicates a higher likelihood to use public transit and a higher "low transportation cost" indicates a lower cost of transportation, residents living in poverty are more likely to use public transit.

Local Trends

Although transit scores are not available for the City of Imperial, transit index scores within the City of El Centro were higher than the County's, ranging from 37 to 44, with Native American and Hispanic residents scoring highest and Whites and Blacks scoring lowest. For residents living below the poverty line, scores were higher for most races, but lower for Native American residents) indicating lower likelihood to use public transit. For low transportation cost indices, scores in the City of El Centro were higher than the County (ranging from 19 to 27) and were in the higher range for residents living below the federal poverty line (23 to 33). Among the races, White and Asian residents scored lowest for the population but highest when living in poverty. The assessment for El Centro has value for considerations for Imperial because the Cities are adjacent and share the same transit resources.

AllTransit 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 most recent data posted (2019), shown on Figures D-23, Imperial has the very low AllTransit Performance Score of 0.0 (out of 10). Although not noted on the AllTransit website, this score is likely attributed to the lack of data contained in the AFFH-T database reflected in Table D-6 Opportunities Indices.

Figure D-23: AllTransit Score- City of Imperial



Economic Development

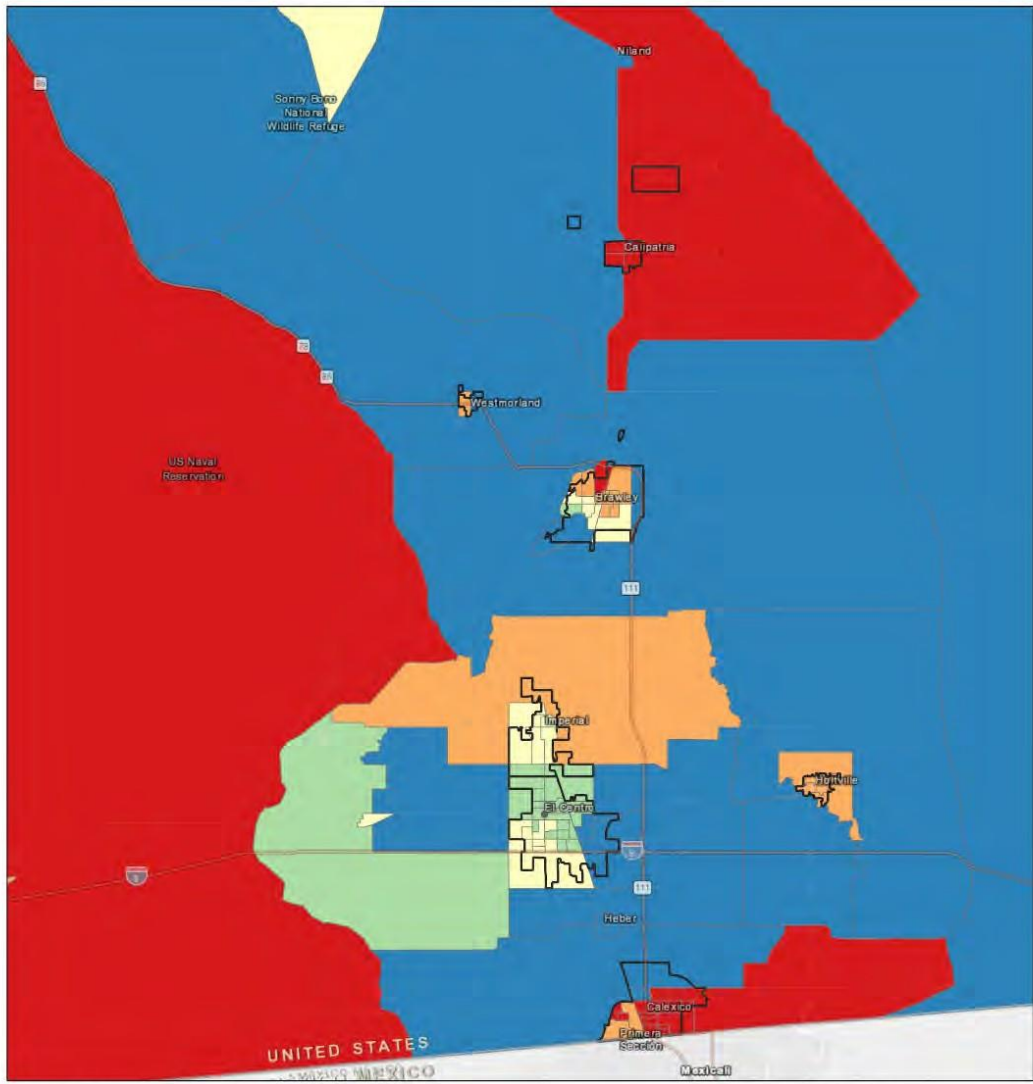
Regional Trends

HUD's opportunity indicators provide scores for labor market and jobs proximity. The labor market score is based the level of employment, labor force participation, and educational attainment in a census tract. Imperial County's labor market scores ranged from five to 27, with Native American residents scoring lowest and Asian residents scoring highest. Considering the majority of the County is Hispanic, Hispanic scored in the midrange of labor market indices (16). Scores for Imperial County residents living below the poverty line dropped notably most races, but increased for Blacks and Native Americans.

HUD's jobs proximity score quantifies the accessibility of a neighborhood to jobs in the region. County jobs proximity indices ranged from 25 for Blacks to 67 for Native Americans. The jobs proximity map in Figure D-24 shows the distribution of scores in Imperial County region. The highest scores are located in the north and eastern areas of the county (where farmland and farming activities occur). The lowest scores are concentrated in the west, northeast, and southern areas of the County (in Calexico and eastern block groups). Major cities like Imperial, El Centro, and Brawley have a variety of job proximity index scores in the mid-range and upper range.

The TCAC Economic Scores are a composite of jobs proximity as well as poverty, adult education, employment, and median home value characteristics. The map in Figure D-25 show that the highest economic scores are in areas surrounding major cities like Brawley, Imperial, and El Centro (in the center of the County, in tracts adjacent to California Hwy 111. The lowest economic scores are found along the US-Mexico border and the exterior tracts of the County.

Figure D-24: Jobs Proximity Index- Region

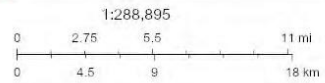


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City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

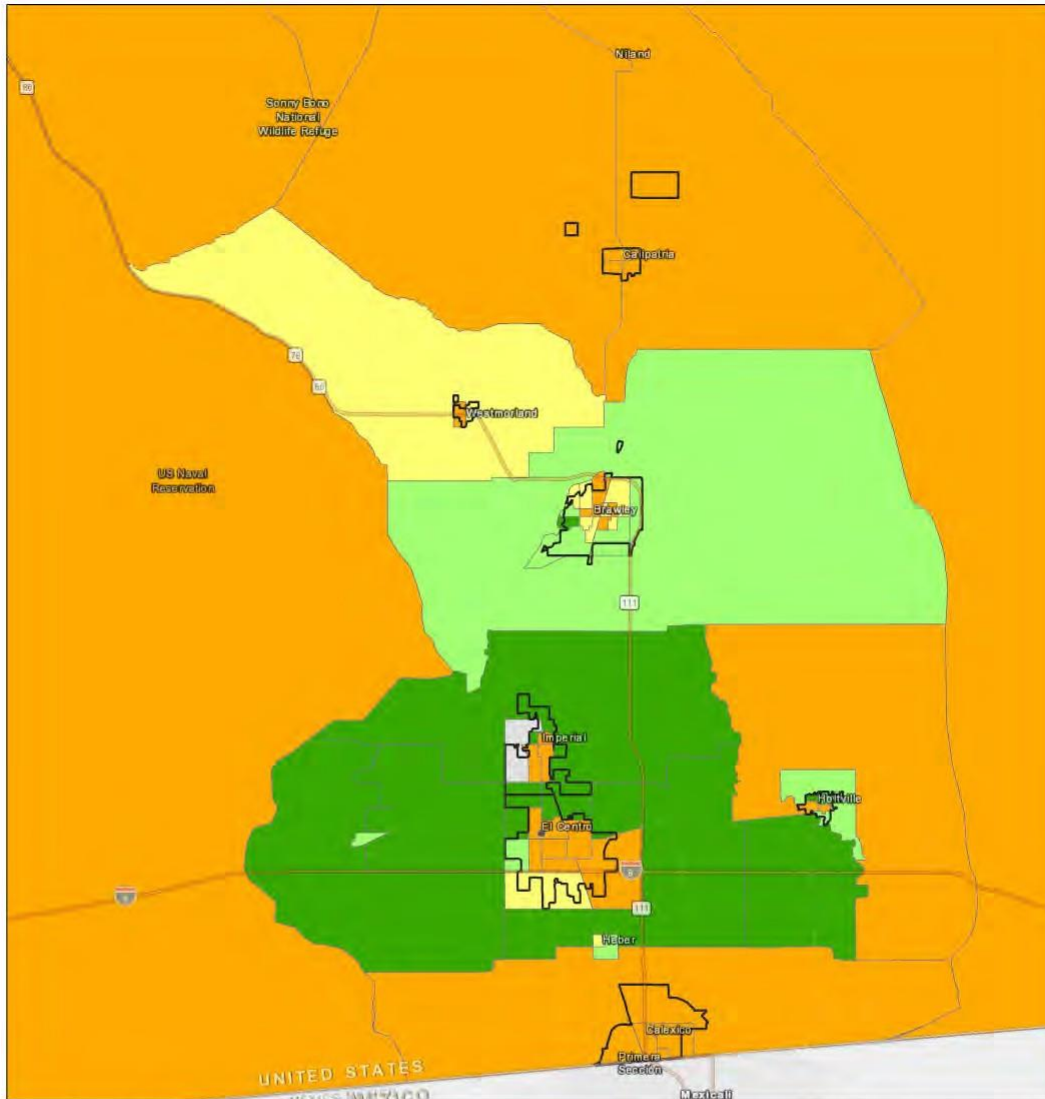
- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)



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Figure D-25: TCAC Economic Score- Region



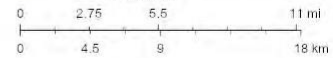
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

1:288,895



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Local Trends

The map in Figure D-26 shows the distribution of job indices within the City. The northern and eastern census tracts scored the lowest, central tracts scored in the mid-range, and southern census tracts scored highest. This trend is likely due to a higher concentration of jobs in El Centro which is adjacent to the south of Imperial.

The TCAC Economic score map in Figure D-27, incorporate jobs proximity as well as poverty, adult education, employment, and median home value characteristics of the area. Once other economic characteristics are incorporated, the map shows that the central portion of the City has the least positive economic outcome while the outskirts of the City are shown to have a more positive economic outcome. No data is provided for the western central portion of the City.

Figure D-26: Jobs Proximity Index – City of Imperial

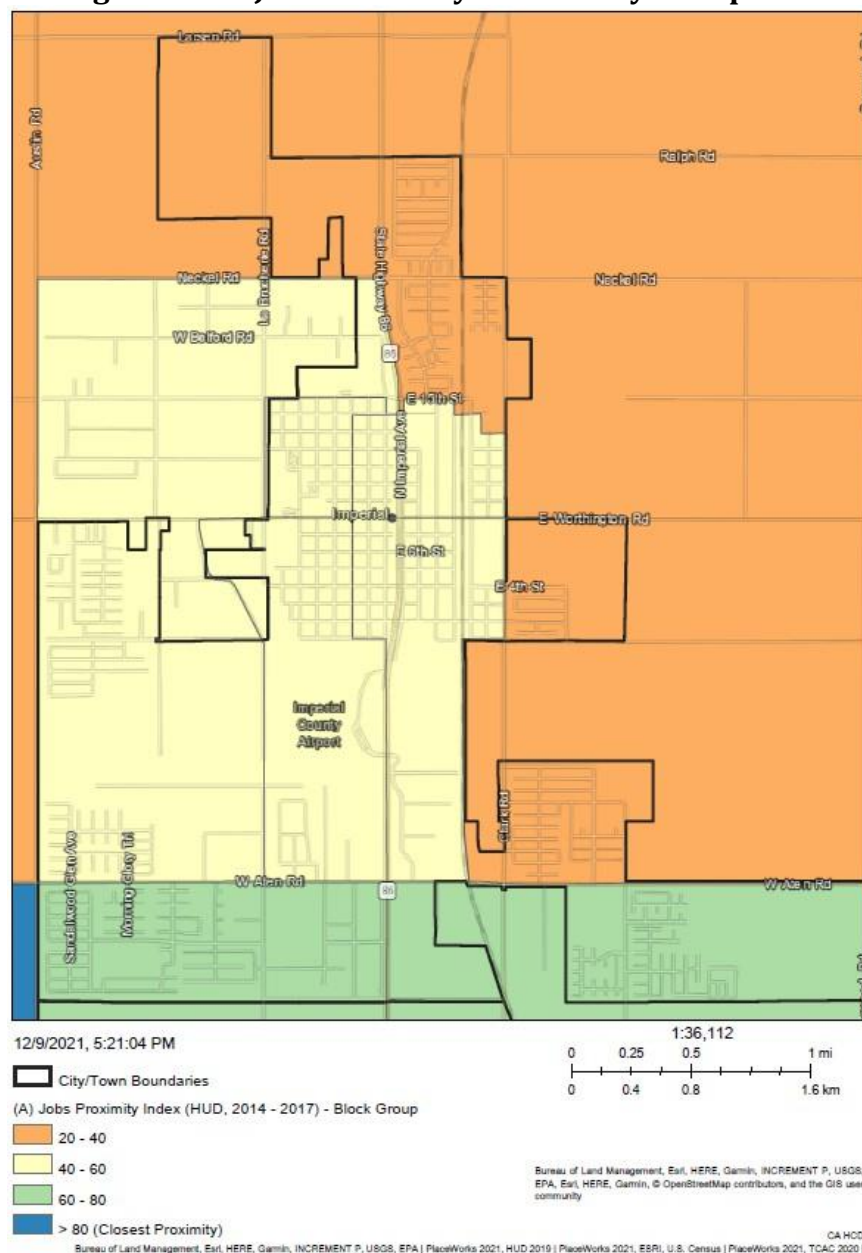
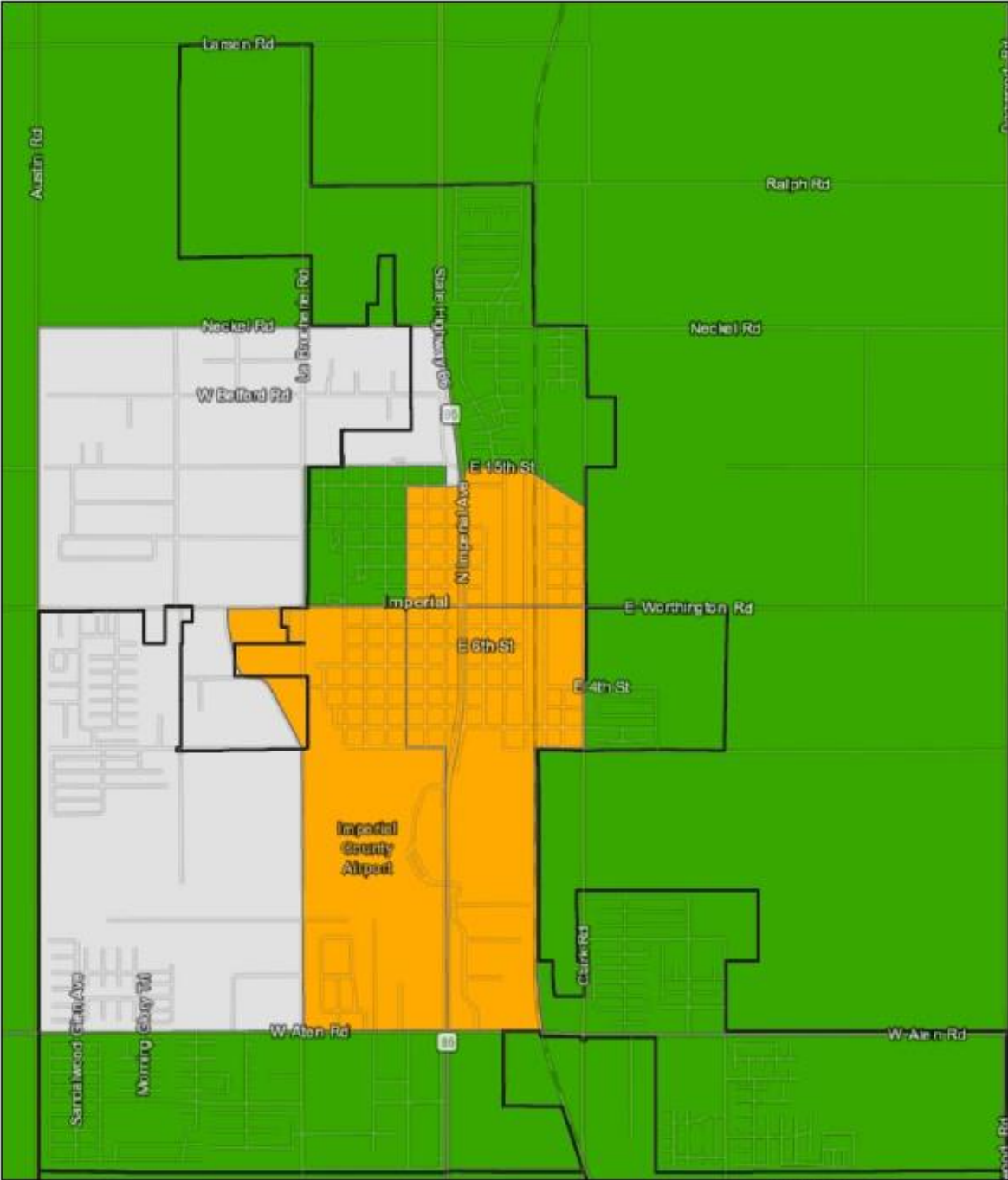


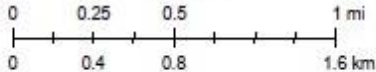
Figure D-27: TCAC Economic Score- City of Imperial



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City/Town Boundaries



(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

< 0.25 (Less Positive Economic Outcome)

> 0.75 (More Positive Economic Outcome)

No Data

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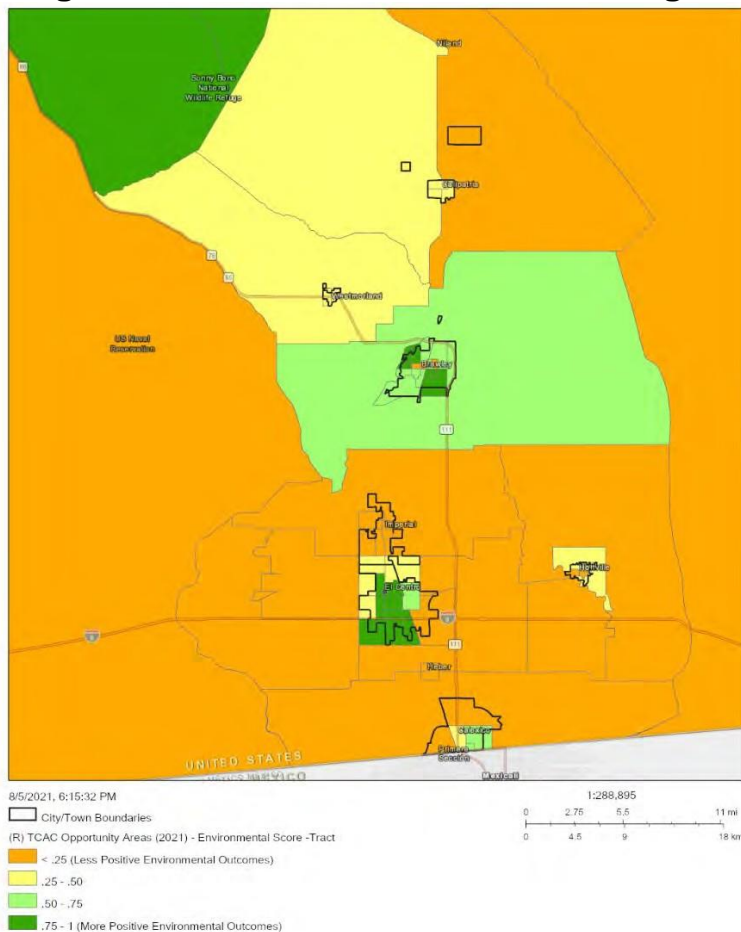
Environment

The TCAC Environmental Score is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment.

Regional Trends

The TCAC Environmental scores were lowest in areas outside of major jurisdictions, with the least positive environmental outcomes throughout the eastern, western, and southern tracts of the County (Figure D-28). Tracts in the cities of El Centro, Calexico, and Brawley scored highest for positive environmental outcomes.

Figure D-28: TCAC Environmental Score- Region



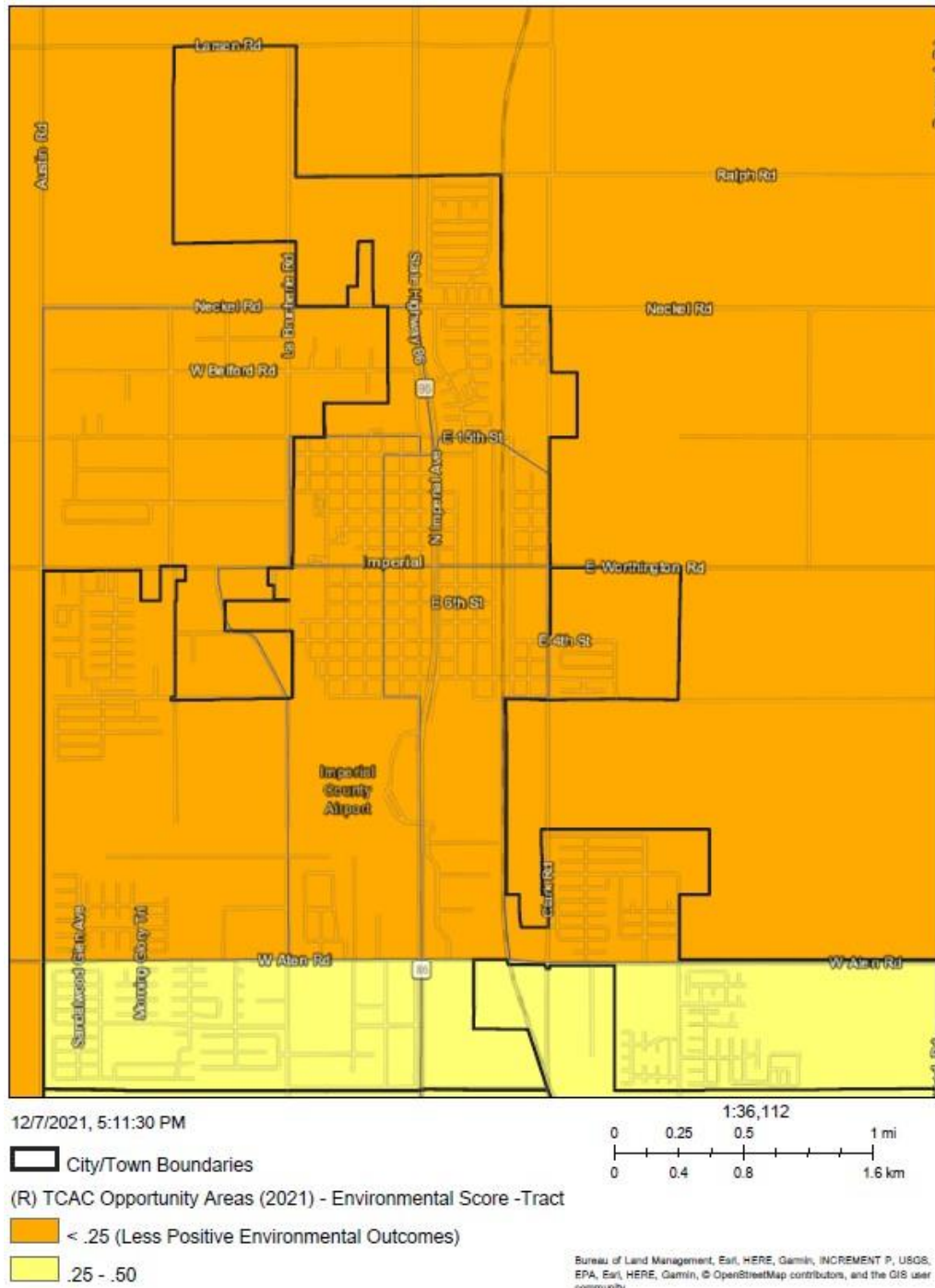
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Local Trends

As shown in Figure D-29, most of the City's census tracts have a less positive environmental outcome with only the tracts adjacent to El Centro scoring slightly better. When compared to the rating of the County, the City of Imperial is similar to much of the rural areas. Possible reasons for the lower environmental outcomes could be related to the closer proximity to farming operations.

Figure D-29: TCAC Environmental Score- City of Imperial



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E. Disproportionate 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, 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. 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
- Units with physical defects (lacking complete kitchen or bathroom)

Cost Burden

Regional Trends

In Imperial County, approximately 36 percent of households were experiencing cost burdens greater than 30% of their income according to the 2013-2017 CHAS data (Table D-7). Renters experience cost burdens at higher rates than owners (48 percent compared to 27 percent). Cost-burdened renter households are concentrated in census tracts in (Figure D-30 and D-31) Calexico, El Centro, Imperial, and Brawley. Cost-burdened owner households are concentrated in a few census tracts also in the same cities. However, the level concentration of cost-burdened households is lower (no census tract has over 80 percent of its owner households experiencing cost burdens).

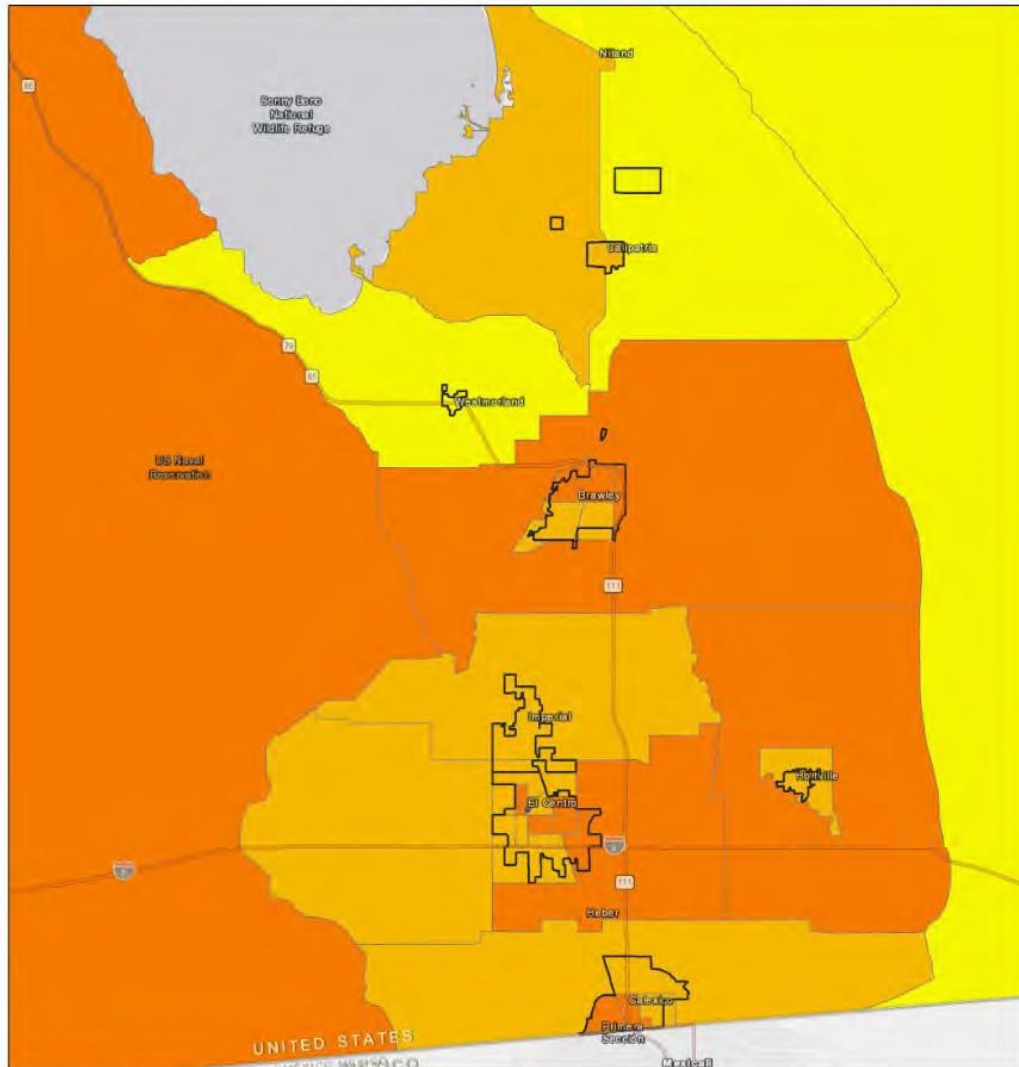
Table D-7: Housing Problems and Cost Burden - Imperial County

	White	Black	Asian	Am · Ind ·	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	19.1%	33.0%	34.1%	9.4%	100.0%	36.9%	2.6%	32.1%
Renter-Occupied	46.6%	50.3%	17.9%	28.1%	0.0%	59.2%	44.8%	56.8%
All Households	25.7%	43.2%	27.5%	16.6%	71.4%	47.5%	23.0%	42.8%
With Cost Burden								
Owner-Occupied	17.8%	33.3%	34.1%	7.5%	100.0%	29.9%	2.6%	26.8%
Renter-Occupied	44.8%	46.3%	10.4%	18.8%	0.0%	50.0%	44.8%	48.6%
All Households	24.3%	41.0%	24.5%	11.8%	71.4%	39.5%	23.0%	36.3%

Source: HUD CHAS, (2013-2017).

Figure D-30: Cost Burdened Owners (2019) – Region

Cost Burdened Owners (2019)- Region



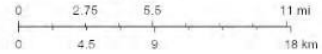
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City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%

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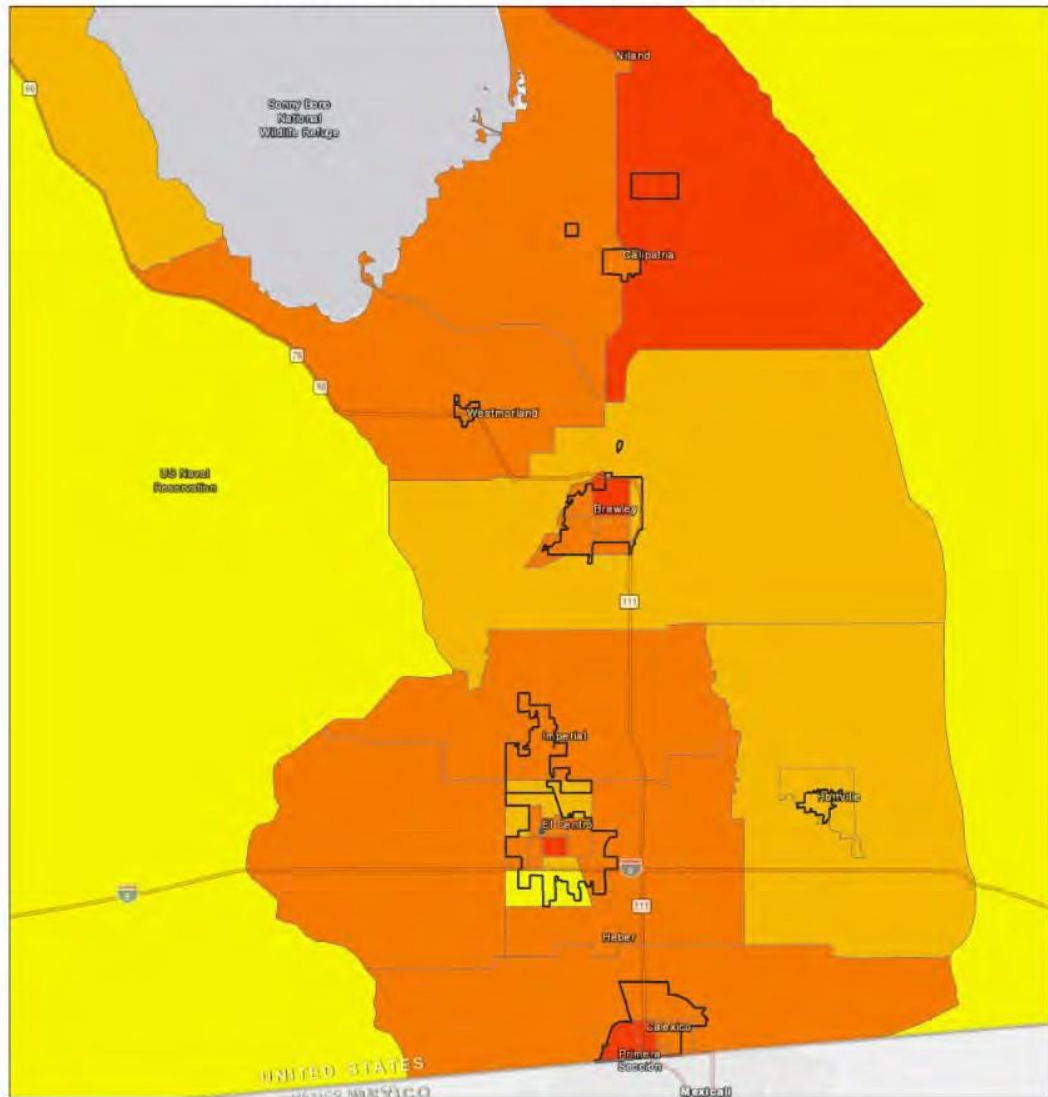
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CA HCD

Figure D-31: Cost Burdened Renters (2019) - Region

Cost Burdened Renters (2019)- Region

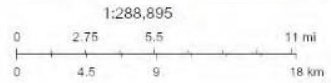


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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%



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Local Trends

Imperial households experience cost burdens at lower rates than the County (24 percent in El Centro, 36 percent in the County). Like the County, renters also experience cost burdens at higher rates than owner households (30 percent and 21 percent, respectively).

Figure D-32 shows the concentration of cost burdened renters in 2019. The majority of cost burdened renter households (40 percent to 60 percent) occur throughout the northern quadrants of the City. Figure D-33 shows the concentration of cost burdened homeowners in 2019. Cost burdened owner households occur at a lower rate (20 percent to 40 percent) and are spread throughout all quadrants of the City.

Figure D-32: Cost Burdened Owners (2019) - City of Imperial

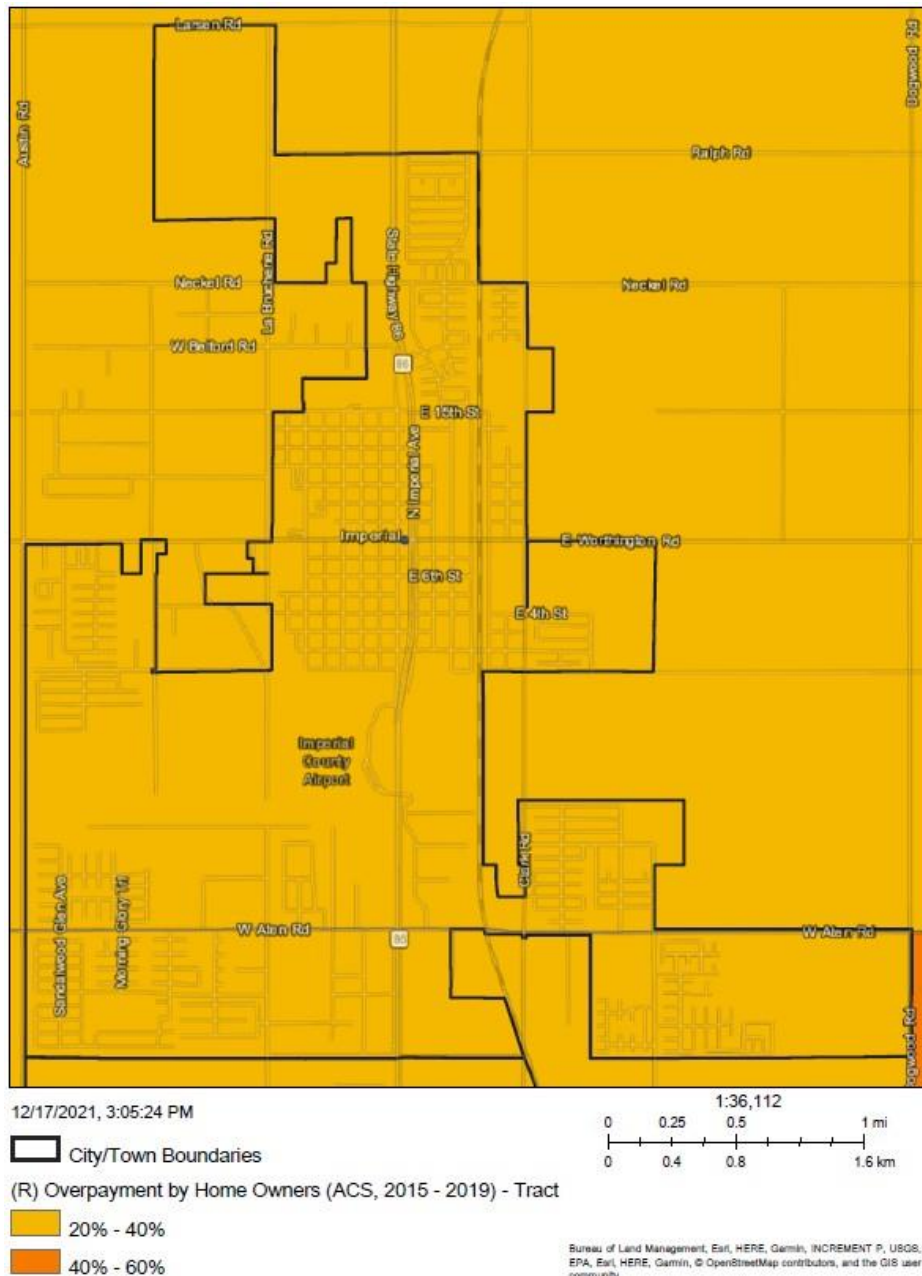
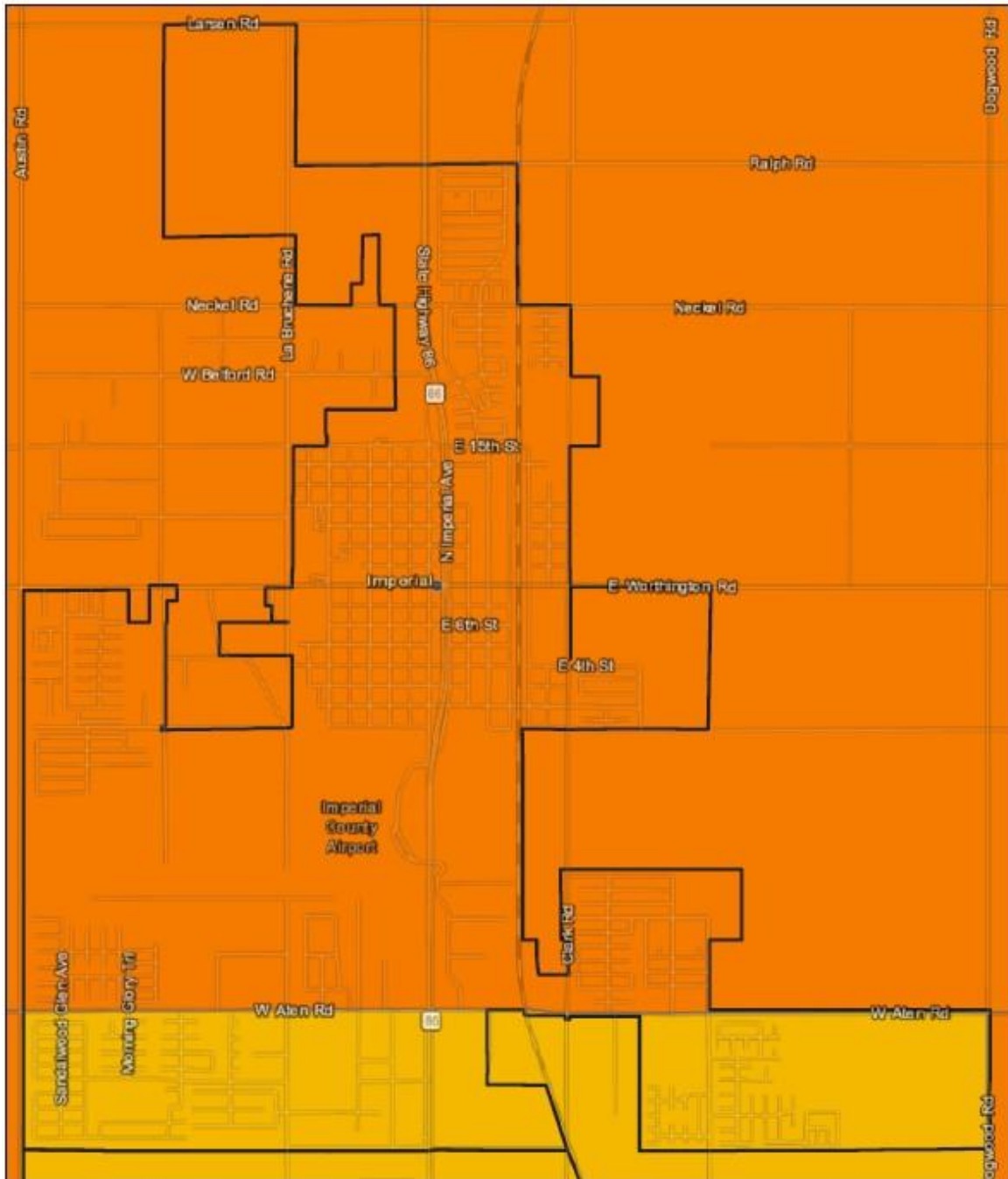


Figure D-33: Cost Burdened Renters (2019) - City of Imperial



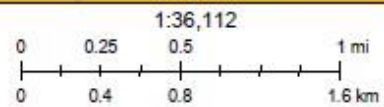
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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

20% - 40%

40% - 60%



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Distribution of RHNA Units by Cost Burdened Households

According to the data, the City is entirely made up of census tracts with 20 to 40 percent cost burdened owner households. Because of this, all RHNA units are distributed in census tracts with this percentage of cost burdened owner households.

Cost burdened renter households are more prevalent throughout the northern portion of the City's census tracts. Referencing Figure D-1, the majority of RHNA unit are distributed in the census tracts where 40 percent to 60 percent of renters are overpaying. However, all low income RHNA units are located in tracts that are is the tracts that contain 20 percent to 40 percent of renters that are overpaying. The location of the low cost RHNA units in these areas could alleviate the cost burdened of existing residents while at the same time lower income units in areas with lower cost burdens can promote mobility.

Overcrowded Households

Regional Trends

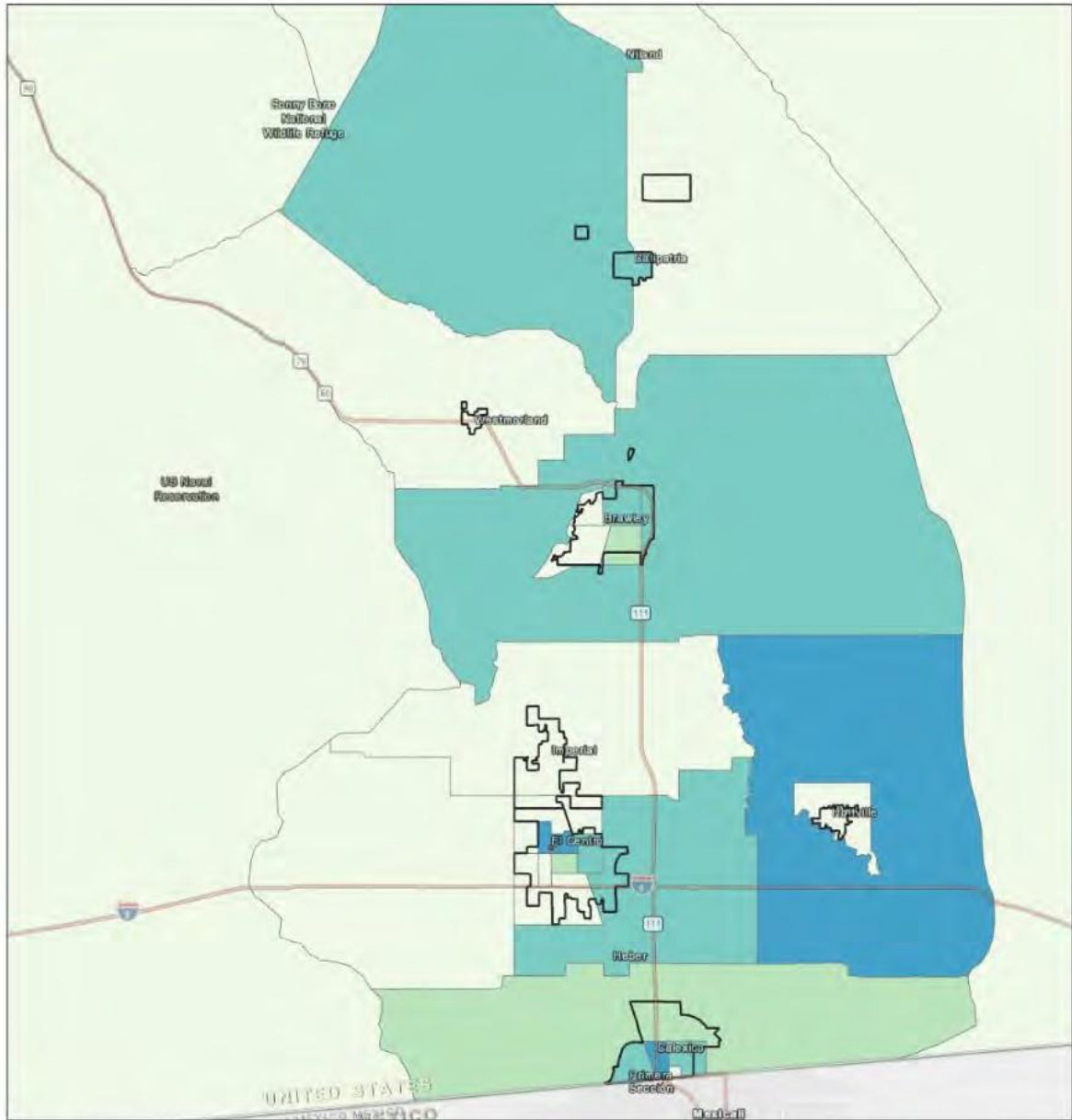
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2019 five-year ACS estimates, about 11 percent of households in the County are living in overcrowded conditions (Table D- 8). Over 16 percent of renter households are living in overcrowded conditions, compared to only seven percent of owner households. As shown in Figure D-34, overcrowded households in the region are concentrated in Calexico, El Centro, and tracts surrounding Brawley and Holtville. The census tract that contains Calipatria also has a concentrated of overcrowded households, where between 12.5 and 15 percent households are experiencing overcrowded conditions.

Table D-8: Overcrowded Households- Imperial County






	Overcrowded (>1.0 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	6.6%	2.5%
Renter Occupied	16.3%	4.4%
All HH	10.7%	3.3%

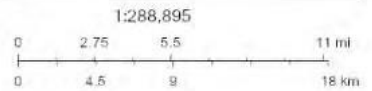
Source: American Community Survey, 2015-2019.

Figure D-34: Overcrowded Households - Region



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-  City/Town Boundaries
- (R) Overcrowded Households (CHHS) - Tract
-  ≤ 8.2% (Statewide Average)
-  8.3% - 12%
-  12.01% - 15%
-  15.01% - 20%



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Local Trends

Households in the City of Imperial experience overcrowded conditions at lower rates than the County. Four percent of Imperial households are living in overcrowded conditions (compared to 10 percent of County households). Unlike County households, renters in Imperial are less likely to experience overcrowded conditions than owners (three percent versus five percent, respectively). Within the City, all the census tracts are experiencing less than the state average (8.2 percent) of overcrowding.

Table D-9: Overcrowded Households- City of Imperial

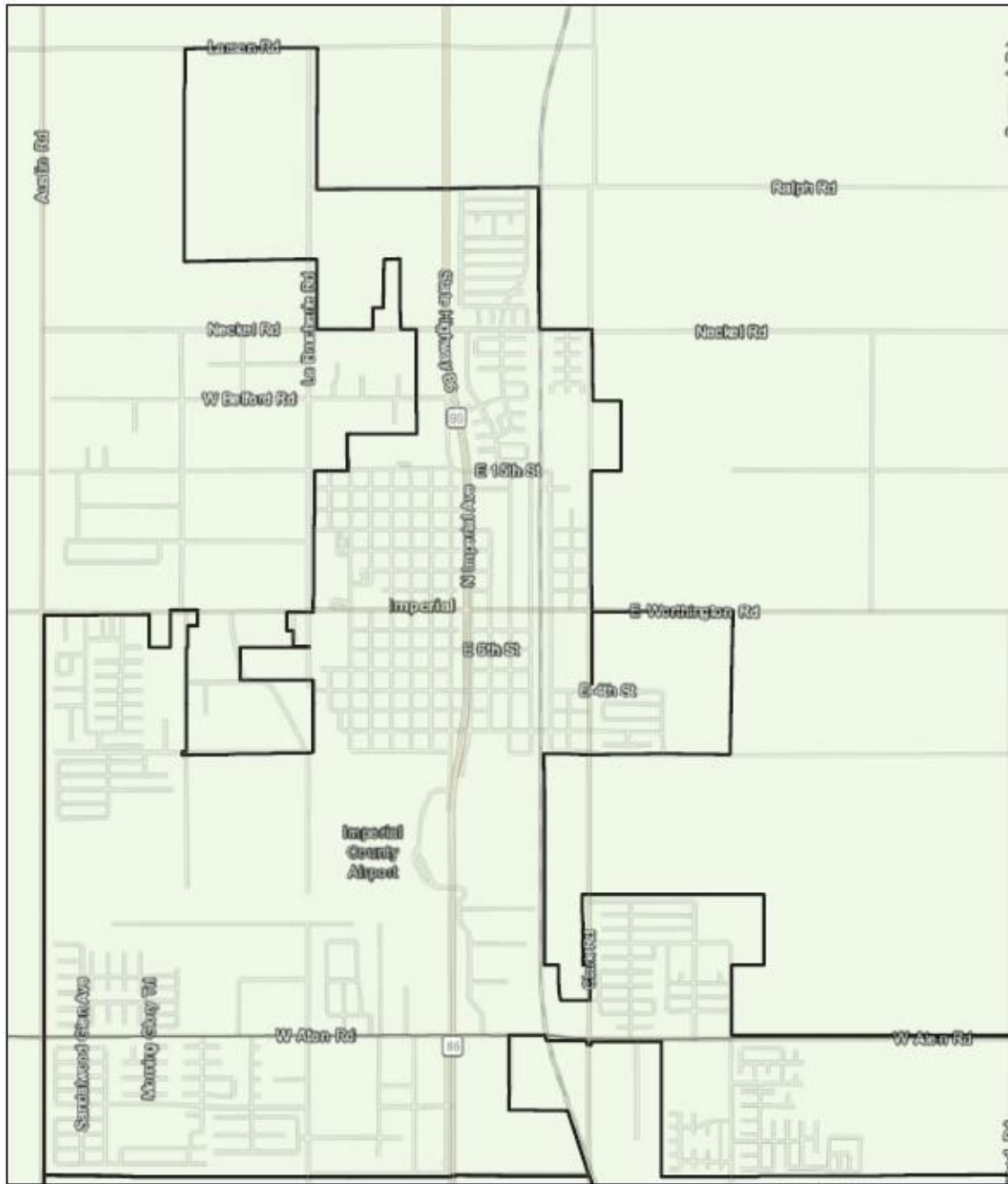
	Overcrowded (>1 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	4.6%	3.3%
Renter Occupied	2.9%	2.6%
All HH	4.2%	3.1%

Source: American Community Survey, 2015-2019.

Distribution of RHNA Units by Overcrowded Households

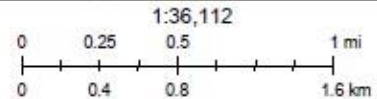
According to the data presented in Figure D-35, the City is entirely made up of census tracts with less than 8.2 percent overcrowded households. Because of this, all RHNA units are distributed in census tracts with this percentage of overcrowded households.

Figure D-35: Overcrowded Households- City of Imperial



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- City/Town Boundaries
- (R) Overcrowded Households (CHHS) - Tract
- ≤ 8.2% (Statewide Average)
- 12.01% - 15%



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Substandard Conditions

Regional Trends

Housing that is 30 years or older is assumed to require some rehabilitation. Such features as electrical capacity, kitchen features, and roofs, usually need updating if no prior replacement work has occurred. According to the 2015-2019 AC estimates, nearly 50 percent of Imperial County’s housing stock was built before 1990 (is over 30 years old) and only 28 percent of housing was built in the last 20 years. The cities of Westmoreland, El Centro, and Holtville have the oldest housing stock in the county, with over 65 percent of their housing stock aged 30 or older.

Local Trends

Median year of structures built in Imperial are shown in the census tracts depicted in Figure D- 36. Older housing is found in the northern central tracts of City and the age of the housing gets younger in a counter-clockwise pattern around the central portion of the City with newer housing occurring along the outer edges.

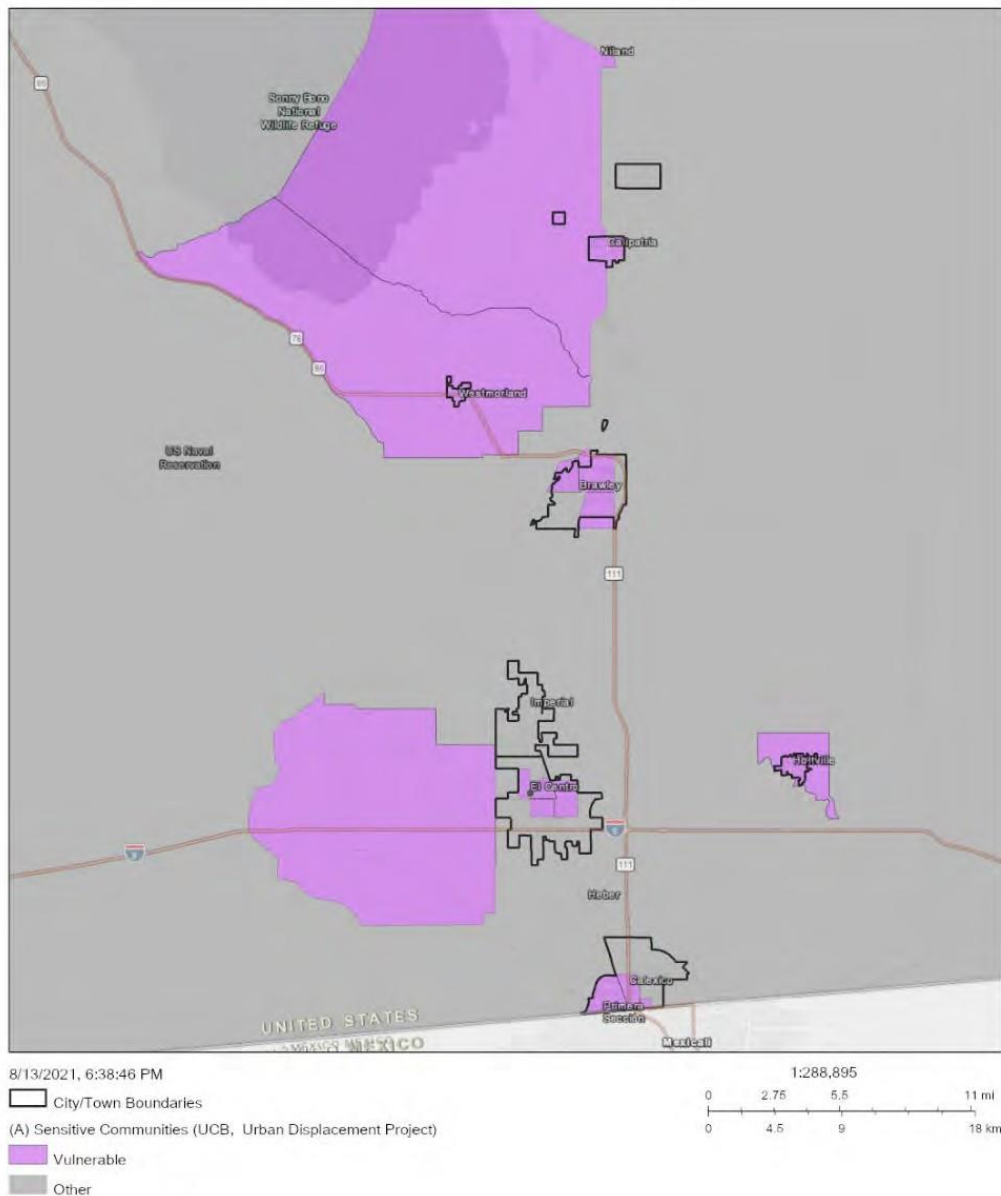
Figure D-36: Median Year Structure Built – City of Imperial



Displacement Risk Regional Trends

UC Berkley’s Urban 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 research has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities were identified in census tracts in the major cities of the County including Calipatria, Westmorland, Brawley, El Centro, Holtville, and Calexico (Figure D-37).

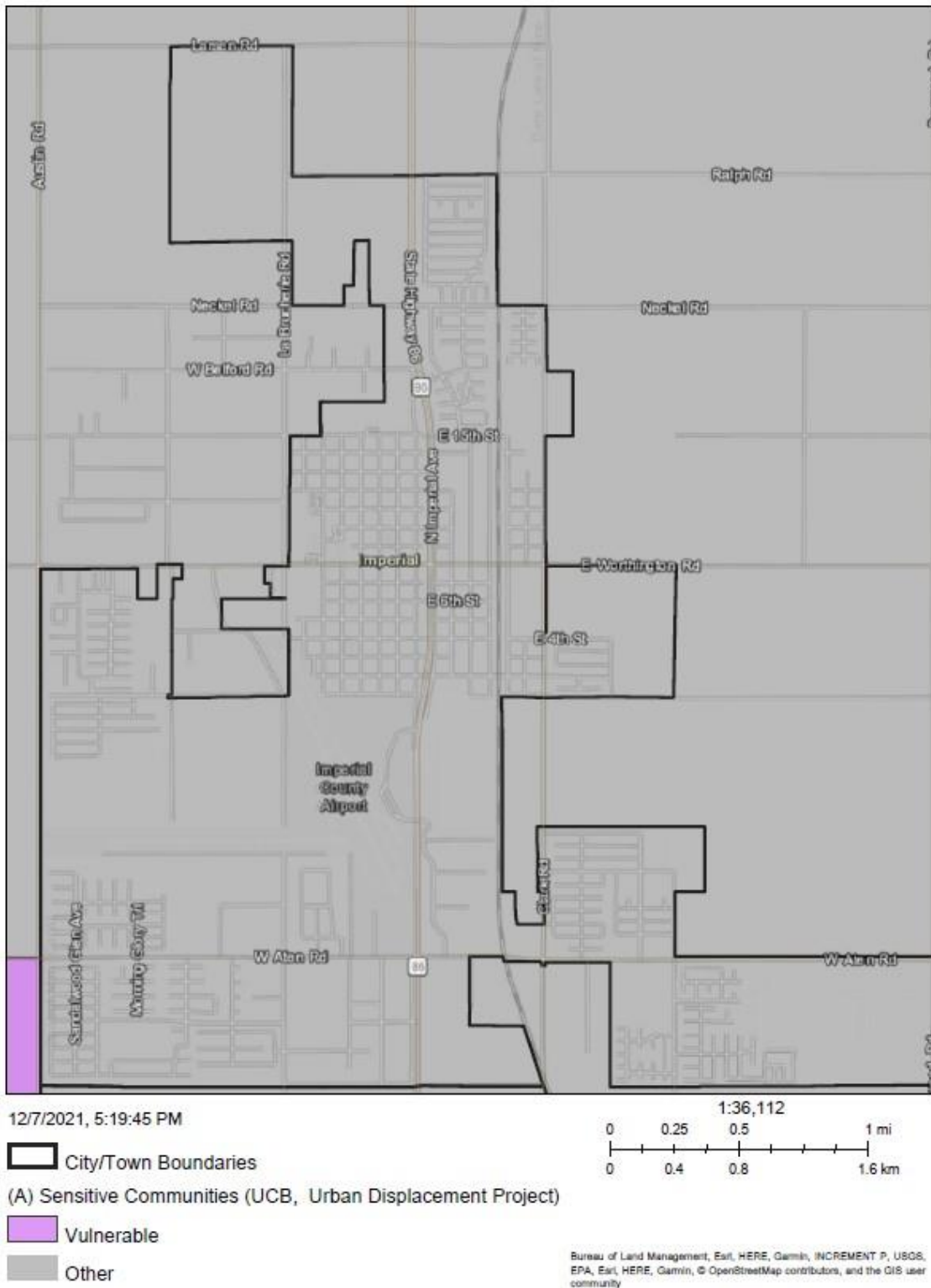
Figure D-37: Sensitive Communities- Region



Local Trends

AS shown in Figure D-38, no sensitive communities have been identified in the City of Imperial.

Figure D-38: Sensitive Communities- City of Imperial



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F. Other Relevant Factors

Lending Practices

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 below identified the lending patterns by race and ethnicity, as well as income category for the El Centro Metropolitan Statistical Area. Specific data for the city of Imperial was unavailable to determine local trends.

Table D-10: Disposition of Loan Applications by Race/Ethnicity - El Centro MSA/MD

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
American Indian and Alaska Native	0.0%	75.0%	25.0%	4
Asian	50.0%	35.7%	14.3%	14
Black or African American	57.1%	28.6%	14.3%	7
Native Hawaiian or other Pacific Islander	66.7%	33.3%	0.0%	3
White	44.1%	24.3%	31.6%	304
Hispanic or Latino	40.6%	30.1%	29.4%	286
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	50.0%	33.3%	16.7%	6
Asian	20.0%	20.0%	60.0%	5
Black or African American	22.2%	33.3%	44.4%	9
Native Hawaiian or other Pacific Islander	20.0%	80.0%	0.0%	5
White	62.5%	18.0%	19.5%	627
Hispanic or Latino	60.2%	18.9%	20.9%	635
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	75.0%	0.0%	25.0%	4
Asian	0.0%	50.0%	50.0%	2
Black or African American	100.0%	0.0%	0.0%	3
Native Hawaiian or other Pacific Islander	0.0%	0.0%	0.0%	0
White	64.4%	15.9%	19.7%	239
Hispanic or Latino	65.2%	14.3%	20.5%	244
100-119% OF MSA/MD MEDIAN				
American Indian and Alaska Native	14.3%	42.9%	42.9%	7
Asian	33.3%	46.7%	20.0%	15
Black or African American	62.5%	25.0%	12.5%	8
Native Hawaiian or other Pacific Islander	100.0%	0.0%	0.0%	2
White	67.0%	12.5%	20.5%	761
Hispanic or Latino	66.3%	12.8%	21.0%	720
120% OR MORE OF MSA/MD MEDIAN				

American Indian and Alaska Native	37.5%	31.3%	31.3%	16
Asian	57.1%	22.9%	20.0%	35
Black or African American	65.2%	26.1%	8.7%	23
Native Hawaiian or other Pacific Islander	38.5%	30.8%	30.8%	13
White	67.4%	10.8%	21.8%	1,796
Hispanic or Latino	65.3%	13.4%	21.4%	1,544
<i>Source: Consumer Financial Protection Bureau. (2019) Disposition of loan applications, by Ethnicity/Race of applicant. Available at https://www.consumerfinance.gov/compliance/compliance-resources/mortgage-resources/hmda-reporting-requirements/home-mortgage-disclosure-act-faqs/.</i>				

According to the data, applicants in the highest income category were more likely to have a loan approved, compared to applicants in the lowest income category where approval rates were consistently under 50 percent. Additionally, within each income category, applicants who identified as White consistently had higher rates of approval than applicants of color or who identified as Hispanic or Latino. Overall, applicants who identified as Black or African American, Native Hawaiian or other Pacific Islander, and American Indian or Alaska Native had the lowest rates of loan approval in many income categories.

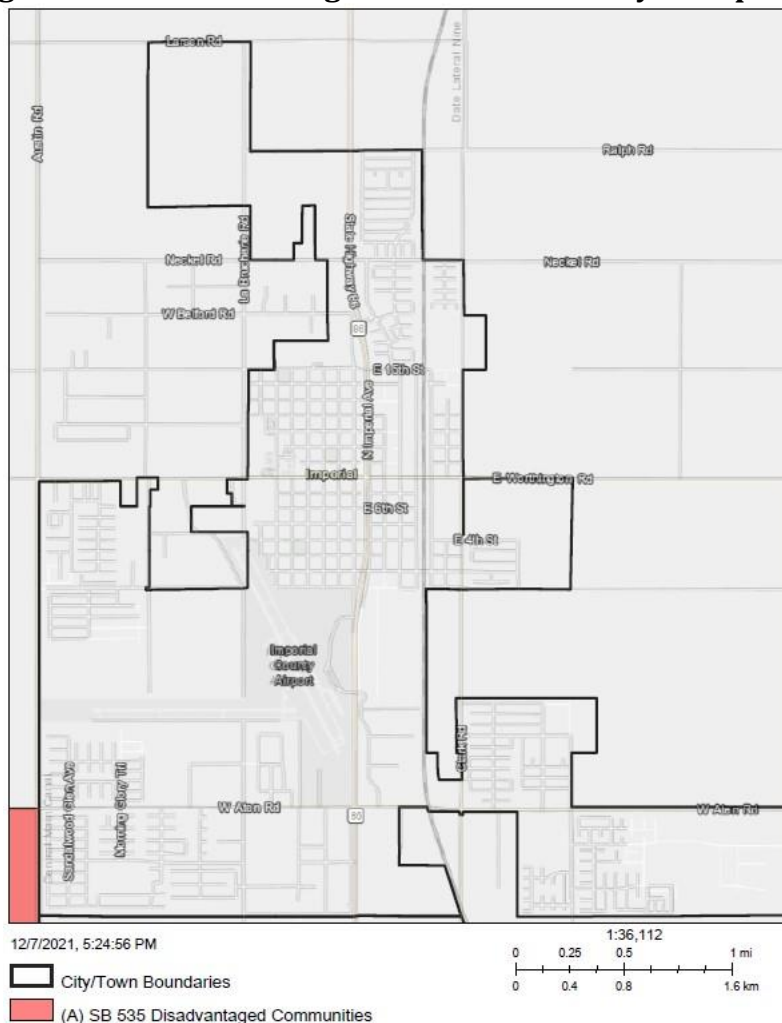
Environmental Justice Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time they’re reducing pollution that causes climate change.

Any jurisdiction can choose to include policies focused on environmental justice (EJ) in their General Plan, but an EJ Element is required under state law for any city or county that includes disadvantaged communities. For the purposes of environmental justice, a disadvantaged community is defined as, “An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”

Senate Bill 535 defines disadvantaged communities as the top 25% scoring areas from CalEnviroScreen. Assembly Bill 1550 defines low-income communities using census data, statewide median income data, and state Department of Housing and Community Development income limits. As shown below (Figure D-39), There are no disadvantaged communities identified in the City of Imperial.

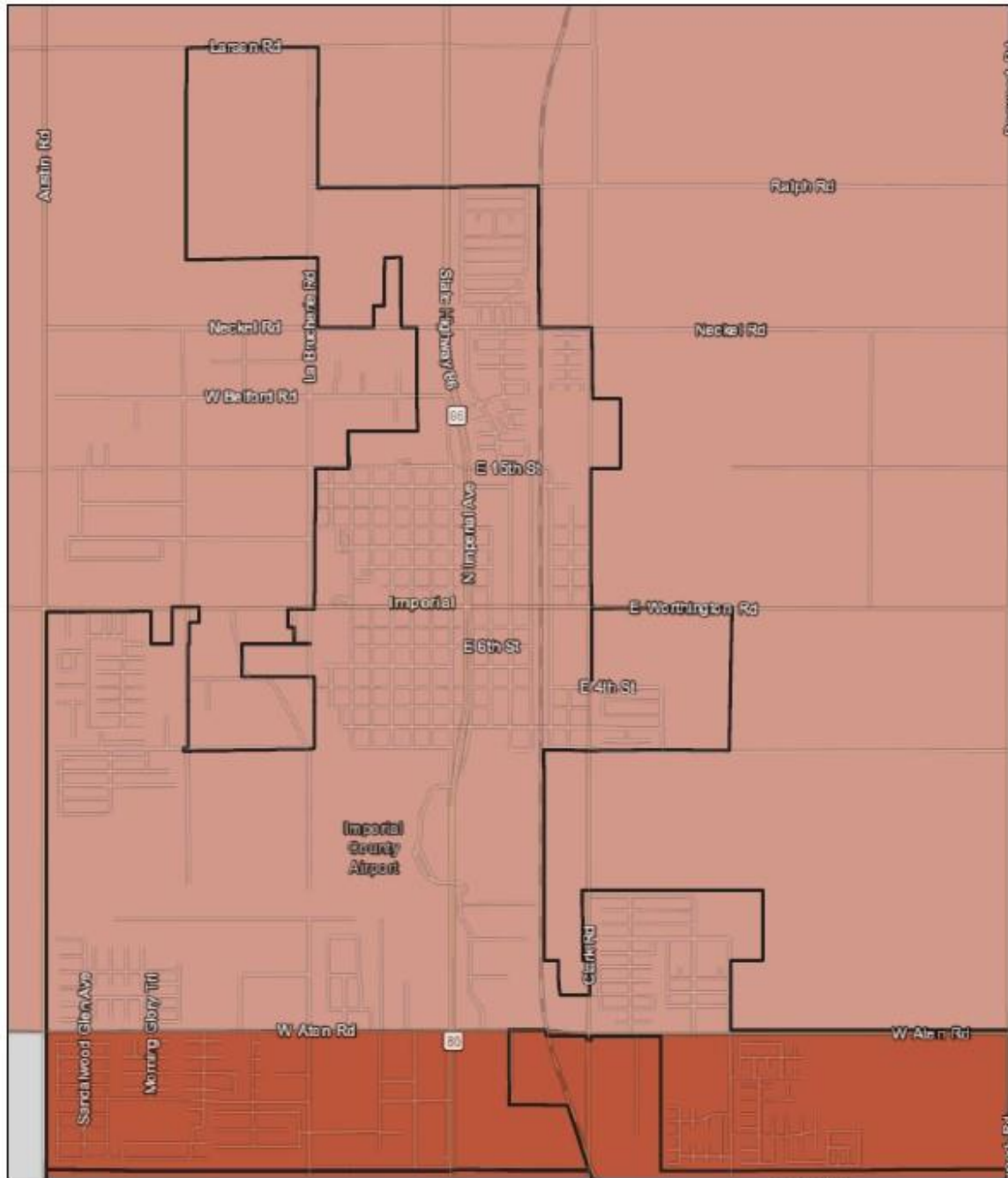
Figure D-39: Disadvantaged Communities- City of Imperial



Housing Choice Vouchers

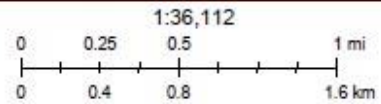
Trends related to housing choice vouchers (HCV) can show patterns of concentration and integration. As of December 2020, 933 Imperial households received Section 8 assistance from the Imperial Valley Housing Authority. The map in Figure D-40 shows that HCV use is dispersed in throughout the majority of the City but is concentrated in the southern quadrants of the City. In these tracts, between 15 and 30 percent of the renter households are HCV users. This may be because these areas have a higher concentration of multi-family developments or that these tracts contain a higher concentration of the population with a disability (Figure D-7). According to the data for the HUD Affordability Index presented in Figure D-41, the entire City shares the same level of affordability category.

Figure D-40: HCV Concentration- City of Imperial



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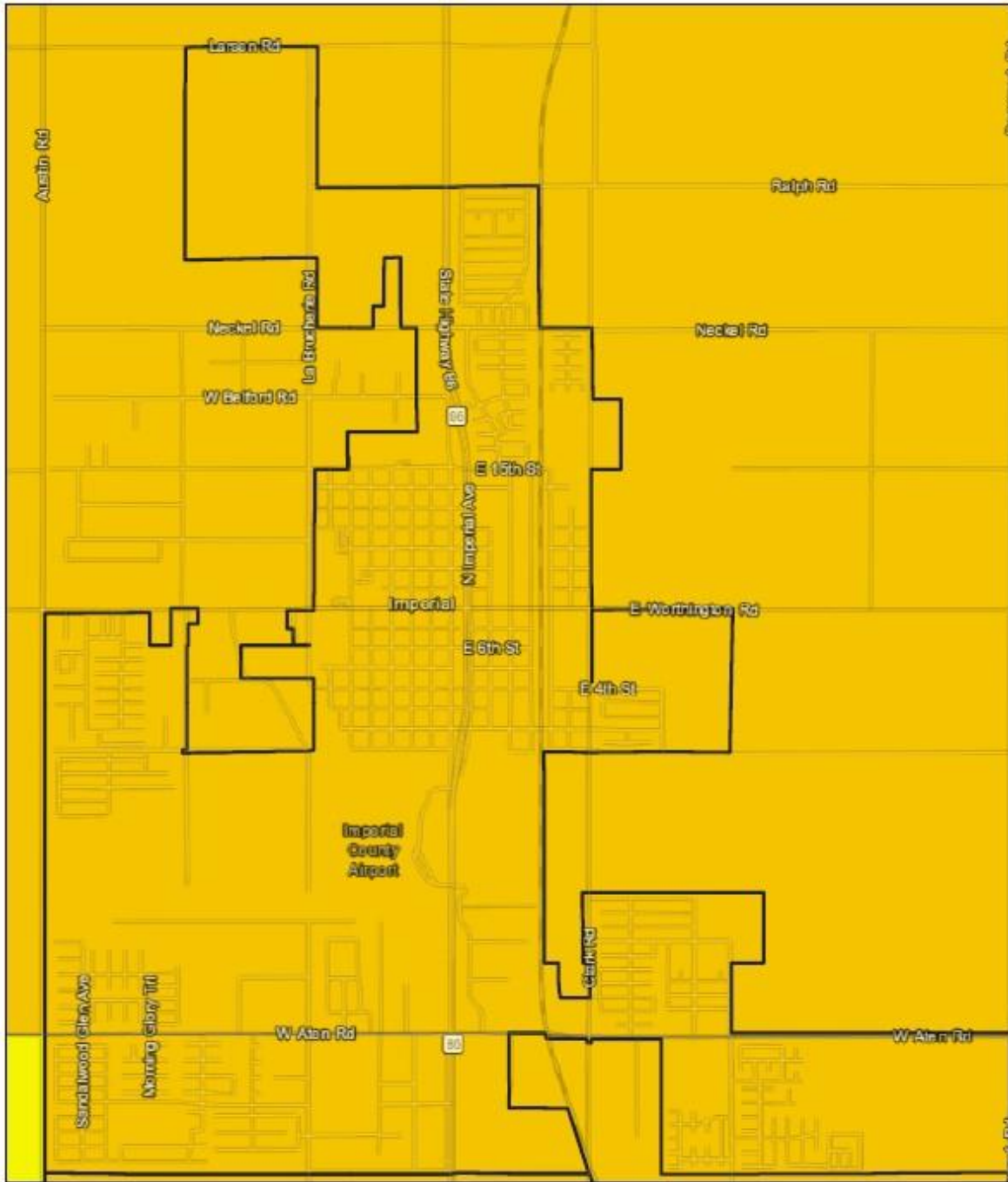
- City/Town Boundaries
- > 0 - 5%
- > 5 - 15%
- > 15 - 30%
- (R) Housing Choice Vouchers - Tract
- No Data



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Figure D-41: Median Gross Rent/ Affordability Index - City of Imperial



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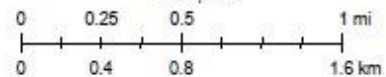
City/Town Boundaries

(R) Location Affordability Index (HUD) - Tract

<\$1,000

<\$1,500

1:36,112



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D.3 Site Inventory

AB 686 requires a jurisdiction's site inventory "...shall be used to identify sites throughout the community, consistent with..." its duty to affirmatively further fair housing. The number of units, location and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to all components of the assessment of fair housing was integrated throughout the discussion in the fair housing assessment section.

As demonstrated in Figure D-1, RHNA sites are geographically concentrated in six specific areas that are dispersed throughout the City. Given the City's unique housing market and related housing costs, areas of "mixed income" units are located in the northern, central-eastern, and southeastern areas of the City. Areas of moderate income units are located in the central eastern portion of the City and above moderate units are located in the central western portion of the City. Lower income units are located along the southern and southeastern portion of the City.

Improved Conditions: Through the placement of lower income units to the south of the City, an improved condition could exist related to the higher concentration of people with disabilities and renters that are cost burdened as well as assist in improving educational outcomes.

Exacerbated Conditions: Given that all the RHNA units were accounted for on vacant properties, the age of existing housing will continue to age further without being replaced by RHNA units. Since no RHNA units are considered in the central area of the City, the lower economic outcome of the central tracts has the potential to continue. Additionally, lower income units are located in the southern area of the City which is in line with higher concentrations of HCV use, thereby continuing or increasing the use of HCVs in this portion of the City.

Isolation of the RHNA: Due to the large amount of undeveloped land in the City of Imperial, vacant lots were the primary consideration for the location of RHNA units. As these are the most likely to be developed, they would be the most suitable for the RHNA units. Although there are six areas where the RHNA units are located, they are dispersed throughout the City. Due to existing zoning, the above moderate units were concentrated in the central western portion of the City. Lots that will contain solely lower income units are located in the southern and southeastern areas of the City and lots that will contain solely moderate units are located in the eastern central portion of the City. However, Imperial is providing a substantial number of units on lots that contain a mixture of moderate and above moderate units in the north, central and southeastern areas of the City. Therefore, although there are some areas of concentrated income units, the City of Imperial is attempting to incorporate all types of RHNA units throughout the City to avoid patterns of isolation.

It is the City's intent to promote mixed-income communities with the goal to improve the conditions of these areas with concentrated disparities. By placing lower income units in areas that have a lower concentration of low to moderate income population there could be a potential for increased opportunities for this segment. Mixed-income RHNA units throughout the City can potentially diversify the socioeconomic profile in the area.

Generally, RHNA site distribution followed the patterns of distribution of the components/characteristics of the assessment of fair housing. Additionally, the development of the proposed RHNA units are not anticipated to further entrench fair housing issues in a way that would create disparities in the future.

D.4 Summary of Fair Housing Issues and Contributing Factors

Through the assessment discussed in this appendix, consultation with surrounding jurisdiction fair housing assessments, and discussions with local stakeholders, the City identified factors that contribute to fair housing factors in Imperial. Table D-11 identifies some fair housing issues and suggests meaningful actions to further fair housing in the City. Unless otherwise indicated, the meaningful actions listed in Table D-11 have been included in Program 20 of the Housing Element Housing Plan.

Table D-11: Fair Housing Issues, Contributing Factors, and Meaningful Actions

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions
Enforcement & Outreach	<ul style="list-style-type: none"> • Lack of readily available fair housing services specific to the City of Imperial. • Reliance on regional fair housing data or data of surrounding communities. • Minimal City staff dedicated to housing services. • People obtain information through many media forms, not limited to traditional newspaper noticing or other print forms. Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large. • Lack of language access. 	<ul style="list-style-type: none"> • Hire additional staff and pursue contracting with the Inland Fair Housing and Mediation Board (IFHMB) to develop and oversee the implementation of fair housing programs. • Monitor and respond to complaints of discrimination (i.e. intaking, investigation of complaints, and resolution). • Obtain and track data related to lending practices specific to the City. • Participate in a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan. • Referring services to appropriate agencies and connect lower-income residents with affordable homeownership and rental opportunities. • Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities. • Conduct workshops and training with different community-based organizations. • Conduct fair housing workshops and training in Spanish. • Hold diversity awareness events and programs at a variety of locations throughout the city. • Outreach targeted and related to home

		financing opportunities.
Disproportionate Housing Needs	Unaffordable rents in a range of sizes. Discriminatory lending practices. Cost of repairs or rehabilitation.	<ul style="list-style-type: none"> • Diversify and expand the housing stock to accommodate the varied housing needs of different groups (Program 1) • Promote the use of density bonuses to increase provision of affordable housing. • Continue to educate all community groups of the services available when it comes to both rental, homeownership, and rehabilitation/maintenance services (Program 18)
Access to Opportunities	Transit	<ul style="list-style-type: none"> • Work with transit agencies to increase mobility and routes.

No policies or programs in the Housing Element have been identified as barriers to fair housing practices in the City of Imperial. In addition to Federal fair housing laws, existing City policies and programs are already in place to increase affordable housing options, as well as ensure the provision of housing to many different population groups, including persons living with disability, large families, farmworkers, and persons who would benefit from supportive and/or transitional housing. The implementation of identified programs would further existing fair housing practices by expanding outreach strategies to include populations that live on lower household incomes and/or those who would be more receptive through Spanish language communication.