February 17, 2022

Jose Ayala, Specialist
California Department of Housing and Community Development
C/O Land Use and Planning Unit
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Sacramento, CA 95833

Mr. Ayala:

We are pleased to submit the adopted 2021-2029 Imperial County Housing Element for the final certification review. This Housing Element describes the County's updated plan for addressing the housing needs of its residents through October 15, 2029. As stated in your letter dated January 18, 2022, the revised draft element meets the statutory requirements described in HCD's September 2, 2021 review and will comply with State Housing Element Law when it is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

The enclosed adopted draft is the same draft HCD reviewed on January 18, 2022. Please find the adopted element and Board of Supervisors Resolutions 2022-17 and 2022-16 attached.

Per Government Code Section 65583(a)(3), an electronic copy of the County's sites inventory was submitted to sitesinventory@hcd.ca.gov.

The County is committed to working with the California Department of Housing and Community Development (HCD) to continue to implement the housing element, to ensure the legal adequacy of the general plan, and to preserve local control of land use decisions.

We look forward to hearing from your office. If you have any questions, please do not hesitate to contact me at (916) 607.7281 or cwalsh@placeworks.com.

Sincerely,

PLACEWORKS

Cynthia Walsh

Cynthia Walsh, Senior Associate I

CC:

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Imperial County
2021-2029 Housing Element

PLACEWORKS

Adopted - February 8, 2022




IMPERIAL COUNTY
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Imperial County

2021-2029 Housing Element

Adopted - February 8, 2022

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I. Introduction

The Housing Element of the General Plan is a comprehensive assessment of current and future housing needs in Imperial County and proposed actions to facilitate the provision of housing to meet those needs for households of all income levels. Policies contained in this element are an expression of the statewide housing priority to allow for the "attainment of decent housing and a suitable living environment for every Californian," as well as a reflection of the unique needs and concerns of the Imperial County community.

The purpose of this Housing Element is to identify and establish the County's policies with respect to meeting the needs of existing and future residents in Imperial County. It establishes policies that will guide County decision-making and sets forth an action plan to implement its housing goals over the next eight years. The commitments are in furtherance of the statewide housing priority as well as a reflection of the concerns unique to Imperial County.

Housing Element Requirements

California Government Code Section 65583 requires the Housing Element to include the following components:

- A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.
- An assessment of housing needs and an inventory of resources and constraints related to meeting these needs.
- An analysis and program for preserving assisted housing developments.
- A statement of community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.
- A program that sets forth an eight-year planning period schedule of actions that the County is undertaking, or intends to undertake, in implementing the policies set forth in the Housing Element.

Housing Element Organization

This Housing Element is organized into the following sections:

- Introduction: This section provides information on the State of California's requirements, the purpose of the Housing Element, the organization of the document, and General Plan consistency.
- Review of Previous Housing Element: This section contains an evaluation of the prior Housing Element and its accomplishments and analyzes differences between what was projected and what was achieved.

- Goals, Policies, and Programs: This section sets forth the County's goals, policies, and programs that are designed to address the housing needs in Imperial County. Based on the findings of all of the previous sections, the Goals, Policies, and Programs section identifies actions the County will take to meet local housing goals, quantified objectives, and address the housing needs in Imperial County.
- Public Participation: Describes the opportunities the County provided for public participation during the preparation of the updated Housing Element.

Appendix A is organized into the following sections:

- Housing Needs Assessment: This section focuses on demographic information, including population trends, ethnicity, age, household composition, income, employment, housing characteristics, housing needs by income, and housing needs for special segments of the population. This section also outlines the characteristics of the community and identifies those characteristics that may impact housing need and availability.
- Housing Resources and Opportunities: This section describes the County's housing resources, historic development patterns, and housing opportunities as well as the County's existing housing stock and the potential areas for future housing development. This section also discusses opportunities for energy conservation, which can reduce costs to homeowners and infrastructure costs to the County. With a reduction in basic living costs through energy savings, more households may be able to afford adequate housing.
- Housing Constraints: This section analyzes potential governmental and non-governmental constraints to housing development in Imperial County. This includes the County's planning, zoning, and building standards that directly affect residential development patterns as well as influence housing availability and affordability. Potential non-governmental constraints include the availability and cost of financing, the price of land, and the materials for building homes, as well as natural conditions that affect the cost of preparing and developing land for housing, and the business decisions of individuals and organizations (some examples are home building, finance, real estate, and rental housing that impact housing cost and availability).

II. Review of Previous Housing Element

The 2014-2021 Housing Element included goals, policies, and programs intended to produce an adequate supply of safe and affordable housing for residents of unincorporated Imperial County. The Review of the previous Housing Element describes the County's progress in implementing each Housing Element. The discussion considers the effectiveness of each program and the appropriateness of continuing the program through the new planning cycle.

As detailed in the table, the County made significant progress in facilitating the development of housing to meet the needs of households of all socioeconomic levels through the adoption of several Specific Plans that call for new housing in a wide variety of types and densities.

Efforts to Address Special Housing Needs

Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs. As shown in the Review of Previous Housing Element matrix on page 4, the 2014-2021 Housing Element included several programs that addressed senior housing needs, emergency shelters, and needs for persons with disabilities. Some of the accomplishments are highlighted below:

- The County provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care.
- The County provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones.
- The County worked with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to identify suitable sites for development of new transitional and supportive housing.
- The County provides informational materials on local service organizations, homeless and community assistance programs, and emergency shelters and transitional housing.
- The County provided hotel vouchers to 27 households for temporary shelter assistance through the HEAP Rapid Re-Housing program.
- The County facilitated a lot merger for an emergency shelter at a fire facilities in Seeley.
- The County approved the issuance of bonds by the California Municipal Finance Authority for the benefit of the Heber del Sol Family Apartments affordable multifamily project permitted by the County.

Program		Implementation Status	Action
Program 1.1.1 Maintain a land inventory of all government and publicly owned surplus sites (including state and federally owned land) in the county that have potential for residential development for extremely low-, very low-, low-, and moderate-income households.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds (staff time) Timetable: Update annually	The County Executive Office maintains a list of all land owned by the County, including land suitable for residential and non-residential uses.	Modified. Covered under new program 1.
Program 1.1.2 The County will provide technical assistance to developers in accessing local, state, and federal funding for affordable housing by: (1) applying for such funding on behalf of affordable housing developers; or (2) providing technical assistance or documentation necessary to support applications for funding by affordable housing developers upon request. Technical assistance will include, but not be limited to: • Provision of data or documents within the County's possession that will contain necessary information to assist in the preparation of a successful grant application, • Letter of support (for projects that have received permit approvals by the County), and • Assistance from the County's staff to locate potential sources of matching funds.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Update annually and ongoing, as needed	The Imperial County Workforce and Economic Department (ICWED) plans to submit a technical assistance application for an update to the Colonias Master Plan in 2021.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 1.1.3 Utilize adequate sites inventory and housing condition survey results to support new construction of housing affordable to extremely low-, very low-, and low-income persons by designating sites in the unincorporated area of the County that are appropriate for affordable housing types, including emergency shelters, transitional housing, mobile homes, multifamily housing types, and farmworker housing.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Review annually, support ongoing	In January 2020, the County Board of Supervisors approved the issuance of bonds by the California Municipal Finance Authority for the benefit of the Heber del Sol Family Apartments affordable multifamily project permitted by the County. The project is planned for 47 income-restricted units and one unrestricted manager's unit in the Heber community and is funded by state and federal Low-Income Housing Tax Credit (LIHTC) funds. The County allowed parking reductions for this project. Construction was expected to begin in June 2020 but has been delayed due to the COVID-19 pandemic.	Modified. Covered under new program 1.
Program 1.1.4 Continue to allow the development of manufactured housing and mobile homes in the R1, R-2, R-3, R-4, A-1, A-2, A-3, S-1, and S-2 zones.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County allows the development of manufactured and mobile homes in the R-1, R-2, R-3 (i.e. duplex), R-4, A-1, A-2, A-3, C-1, C-2, C-3 (i.e. mobile home park), S-1, and S-2 zones. During the planning period (2014-2021), the County permitted 32 mobile homes on private lots and 106 mobile homes in parks.	Completed. Delete.
Program 1.1.5 Continue to ensure appropriate zoning that allows for medium- and high-density housing for extremely low-, very low-, low-, and moderate-income housing throughout the unincorporated County.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	High-density zones (R-3, R-4) allow up to 29 units per acre, suitable for medium- and high-density housing for lower-income and moderate-income housing. The Heber del Sol Family Apartments were permitted for 48 units, 47 of which will be affordable to low-income households, in the R-3 zone. One other multifamily duplex was permitted in 2016 with no affordability restrictions. Due to market conditions, development in the County during the previous planning period was primarily	Modified. Covered under new program 1.

Program		Implementation Status	Action
		mobile homes (138 total) and single-family units (19 total), despite the availability of appropriately zoned land for medium- and high-density housing.	
Program 1.1.6 Continue to encourage Planned Developments through the Specific Plan development agreement process to achieve innovative housing designs.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	No Specific Plans were approved during the previous planning period. The owners of the McCabe Ranch II, Rancho Los Lagos, and 101 Ranch approved Specific Plans have not developed the projects. The County has worked with the owners to grant map extensions for those needed to encourage development.	Continue. New program 3.
Program 1.1.7 Continue to allow the development of housing for farmworkers in the A-2, A-3, AM-1, and AM-2 zones.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The A-2, A-3, and AM-1 zones allow a single-family unit by right, and farm labor housing with a conditional-use permit, with no limitations on the number of units. The AM-2 zone allows a single-family unit, accessory dwelling unit (ADU) incidental to the primary use, and farm labor housing by right.	Completed. Delete.
Program 1.1.8 To ensure continued compliance with the Employee Housing Act, especially California Health and Safety Code Sections 17021.5 and 17021.6, the County has set forth the following conditions for affordable housing: • Employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation. • For the purpose of all local ordinances,	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County lists employee housing in Division 5 and defines it in the 2014-2021 Housing Element. The Zoning Code refers to employee housing as farm labor housing, meeting the needs of the same population. The A-2, A-3, and AM-1 zones allow farm labor housing with a conditional-use permit and the AM-2 zone allows farm labor housing by right.	Continue. Covered under new program 7.

Program		Implementation Status	Action
employee housing shall not be included within the definition of a boarding house, rooming house, hotel, dormitory, or other term that implies the employee housing is a business run for profit or differs in any other way from a family dwelling. • The use of a family dwelling for purposes of employee housing serving six or fewer persons shall not constitute a change of occupancy. • The review will ensure consistency with the following concerning employee housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household. • Employee housing shall not be deemed a use that implies that the employee housing is an activity that differs in any other way from an agricultural use. • No conditional-use permit, zoning variance, or other zoning clearance shall be required of this employee housing that is not required of any other agricultural activity in the same zone. • The permitted occupancy in employee housing in an agricultural zone shall include agricultural employees who do not work on the property where the employee housing is located.			
Program 2.1.1 Continue to support the efforts of the Imperial Valley Housing Authority by	Responsible Agency: Planning and Development Services	The County continues to support Imperial Valley Housing Authority. The Planning and	Modified. Covered

Program		Implementation Status	Action
providing technical assistance in funding acquisition and the construction of affordable housing units by assisting them with developing innovative and cost-effective construction methods, including the use of solar energy, xeriscaping, and green building materials.	Department, Imperial Valley Housing Authority Funding Source: Grant funds, General Funds (staff time) Timetable: Review coordinated efforts annually, support ongoing	Development Services offers technical assistance in applying for funding and incentives for high density affordable housing. While no new affordable units were constructed or acquired by the Housing Authority during the previous planning period, the County is committed to supporting this work and has included more specific strategies in the 6th cycle programs.	under new program 4.
Program 2.2.1 Encourage innovative and cost-effective construction methods to reduce housing costs by providing incentives such as density bonus units, reduction in development standards, fee waivers/deferrals, and providing assistance in accessing state and federal subsidies. The County will also continue to contract with outside firms to perform plan check reviews for more complex projects in an effort to provide timely development approvals.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 5, Section 90305.00 of the County's Land Use Ordinance provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. No projects requested density bonuses in the previous planning period.	Modified. Covered under new program 4.
Program 2.2.2 The County will promote the use of density bonuses for lower-income units by including information about density bonus units and related incentives on the County's updated website.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time)	Density bonus provisions are listed in Division 3, Chapter 5, Section 90305.0 of the County's Land Use Ordinance. The code provides density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A	Modified. Covered under new program 6.

Program		Implementation Status	Action
	Timetable: Ongoing	density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. The County will promote the use of density bonuses by listing these requirements and opportunities on the County's website.	
Program 2.2.3 Increase the supply of affordable housing for special-needs groups by encouraging the development of attached or detached second dwelling units on existing residential lots by providing information to homeowners about second units at the Planning and Development Services Department offices.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County works closely with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to pursue opportunities for development of new transitional and supportive housing, as well as other housing types for special-needs group. The County and these groups have identified suitable sites, but none have been developed. Additionally, County approved seven accessory dwelling units (ADU)'s and one Junior ADU in 2020.	Modified. Covered under new program 8.
Program 2.2.4 Continue to monitor State Density Bonus law to ensure the County's ordinance is in compliance with state regulations.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Annually	Chapter 5, Section 90305.00, of the County's Land Use Ordinance provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential	Combined with Program 2.2.2. Covered under new program 6.

Program		Implementation Status	Action
		projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. The County will update the density bonus in the Code to reflect current State law.	
Program 2.2.5 Allow for the development of mixed-use zoning in the Light Commercial (C-1) and General Commercial (C-2) zoning districts that allow for residential development at up to 29 dwelling units per acre.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 6, Section 90306.01, of Division 3 of the County's Land Use Ordinance establishes the C-1 (Light Commercial) and C-2 (General Commercial) zones as allowing mixed-use development and discourages single-use development. The C-1 zone permits 29 dwelling units per acre and C-2 does not establish a maximum number of allowable dwelling units.	Completed. Delete.
Program 2.2.6 Continue to support the use of federal and state funding resources for meeting local housing needs and programs, especially for households with specials needs, particularly seniors and those with disabilities and development disabilities, and lower incomes.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	In 2021, Workforce and Economic Development provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care. Workforce and Economic Development provided TBRA between 2017 and 2018 and served a total of 150 households. Of the 150 assisted households, 50 were served through the HEAP program in 2020. The County will continue to apply for available funding to meet the needs of the community and plans to submit additional funding	Modified. Covered under new program 9.

Program		Implementation Status	Action
		applications for Community Development Block Grant (CDBG) in early 2021.	
Program 2.2.7 Continue to seek funding from the Joe Serna Jr. Farmworker Housing Grant Program (Serna) for the rehabilitation of existing farmworker units and the construction of new units. The County will also collaborate with agricultural employers to identify sites and funding sources available through the California Department of Housing and Community Development (HCD) and the United States Department of Agriculture (USDA) Rural Development programs for farmworker housing.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds, Serna, CDBG Timetable: As Notices of Funding Availability (NOFAs) are released	Due to limited staff capacity, the County has not applied for funding through the Joe Serna Jr. Farmworker Housing Grant Program or other funding for farmworker housing. As farmworkers are an integral part of the County's community and economy, this program will be strengthened to identify funding during the 2021-2029 planning period.	Modified. Covered under new program 10.
Program 2.2.8 Continue to promote development of assisted rental housing for extremely low-, very low-, low-, and moderate-income persons and families through below-market rate financing through private lenders and possibly with the use of tax-exempt Mortgage Revenue Bonds by providing technical assistance with funding applications and other necessary paperwork.	Responsible Agency: Planning and Development Services Department Funding Source: California Housing Finance Agency (CHFA) Timetable: Ongoing	The County responds to requests for information and assistance on a project-by-project basis for affordable rental housing. Additionally, the County encourages development of housing for lower-income households through density bonus incentives and coordination with the Board of Supervisors and housing providers. However, no projects requested financing or technical assistance during the previous planning period.	Modified. Covered under new program 12.
Program 2.2.9 Continue to support self-help housing providers to develop affordable homeownership projects for lower-income households and especially agricultural workers by providing technical assistance with funding applications and other paperwork, as well as by helping self-help housing providers secure sites for their developments.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	The County responds to requests for information and assistance on a project-by-project basis from self-help housing providers for affordable homeownership projects. No questions were received for affordable homeownership projects proposed during the previous planning period.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 2.2.10 The County will assist and support local social service agencies in their applications for state and federal funds to provide housing-related services to lower-income households and special-needs groups, particularly those offering supportive housing programs for homeless individuals and families.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing or as requested	In 2021, Workforce and Economic Development provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care. Workforce and Economic Development is also in the process of preparing to implement a TBRA program, funded by HCD - HOME and two Housing Rehabilitation Programs funded by HCD – CDBG. Subsistence payments funding was awarded through the 16-CDBG-11151 grant. The County began implementation on March 9, 2017, and the program was completed on February 13, 2019. A total of 20 households were assisted.	Modified. Covered under new program 11.
Program 3.1.1 Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services Department offices.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Review information and update quarterly, distribution ongoing	Flyers and pamphlets with information on local service organizations, homeless and community assistance programs, and emergency shelters and transitional housing are available in all County offices.	Continue. New program 13.
Program 3.1.2 Assist emergency shelters/transitional housing providers in	Responsible Agency: Planning and Development Services Department	The County Workforce and Economic Development, working closely with the Department of Social Services, implemented the	Modified. Covered

Program		Implementation Status	Action
acquiring state, federal, and local funding for services for the homeless.	**Funding Source**: General Funds (staff time) **Timetable**: Ongoing	rapid rehousing program under HEAP, which provides temporary shelter assistance though hotel vouchers. A total of 27 households have received hotel vouchers through the HEAP IC Rapid Re-Housing program. Vouchers ranged from 7-day to 90-day vouchers.	under new program 14.
Program 3.1.3 The County will continue to allow for the development of transitional housing, and per Section 50675.14 of the Health and Safety Code, continue to allow supportive housing as a permitted use in residential districts.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Transitional housing is currently a permitted use in the R-3, C-2, A-1, and M-1 zones. The County will update Title 9 to allow transitional housing in all zones where residential uses are permitted.	Modified. Covered under new program 15.
Program 3.1.4 Pursuant to Senate Bill 2, continue to allow emergency shelters as a permitted use in the General Commercial (C-2) and Light Industrial (M- 1) zones in the County Land Use Ordinance Title 9.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Emergency shelters are permitted by right in the C-2 (Medium Commercial) and M-1 (Light Industrial) zones and with a Conditional Use Permit in the A-1 zone. The County received a Lot Merger proposal for the development of a Fire Facility in Seeley with an emergency shelter to be used in lieu of the apparatus room when temperatures reach high levels.	Completed. Delete.
Program 3.1.5 Ensure new developments are compliant with standards outlined in the Americans with Disabilities Act (ADA) for persons with disabilities.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time)	Chapter 7, Section 90307.01 of the County's Land Use Ordinance (Title 9) establishes a process for reasonable accommodation requests for persons with disabilities. The County Building Department reviews development standards for compliance with the ADA regularly during the building permit review process.	Modified. Covered under new program 16.

Program		Implementation Status	Action
	Timetable: Ongoing		
Program 3.1.6 Continue to allow supportive housing types for persons with special housing needs, including persons with disabilities and developmental disabilities, in the County Land Use Ordinance Title 9, including the following: • Provision for group homes over six residents specifically for the disabled, other than those residential zones covered by state law; • Siting or separation requirements for licensed residential care facilities, to determine the extent to which the local restrictions affect the development and cost of housing; • Any minimum distance requirements in the Land Use Element for the siting of special-needs housing developments in relationship to each other do not impact the development and cost of housing for persons with disabilities; and • Alternate residential parking requirements, including reduction, for developments, including housing types for persons with special housing needs.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Chapter 7, Section 90307.01 of the County's Land Use Ordinance (Title 9) establishes a process for reasonable accommodation requests for persons with disabilities. Residential care facilities for five or fewer individuals are permitted in the R-1, R-2, R-3 and A-2 zones; residential care facilities for six or fewer individuals are permitted in the R-3, R-4, and A-1 zones; residential care facilities for six or more are allowed in the R-1 and R-2 zones with a Conditional Use Permit. Community care facilities are permitted with a conditional-use permit in the R-3, R-4, A-1, and A-2 zones. The County will update Title 9 to reflect current state law. No supportive housing projects were proposed in the previous planning period.	Modified. Covered under new program 15.
Program 3.1.7 To address the extremely low-income housing need and ensure compliance with Assembly Bill (AB) 2634, the County Land Use Ordinance Title 9 will continue to explicitly allow single-room occupancy units (SROs) as permitted uses in the Medium- to High-Density Residential (R-3), High-Density Residential (R-4),	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time)	Single-room occupancy is permitted in the R-3, R-4, C-1, C-2, and A-1 zones to provide housing for extremely low-income residents. No applications were received for SROs in the previous planning period.	Modified. Covered under new program 17.

Program		Implementation Status	Action
General Commercial (C-2), and Limited Agricultural (A-1) zones.	**Timetable**: Ongoing		
Program 4.1.1 Encourage 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.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Update and redistribute assistance program information quarterly or as needed, education programs ongoing	At all Board of Supervisor meetings, the County discusses strategies to encourage housing outreach and education programs; however, there has been no interest in such a program.	Modified. Covered under new program 19.
Program 4.1.2 Ensure that fair housing enforcement is reviewed periodically to prevent discrimination. Reduce any effects of housing discrimination and prevent future discrimination by referring potential victims of discrimination to the appropriate fair housing agency.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Annually	The County reviewed and amended Division 5 of Title 9 (the Zoning Ordinance) to ensure compliance with fair housing law, and continues to examine land use policies, permitting practices, and building codes to comply with state and federal fair housing laws. Imperial County complies with fair housing law regarding complaints by internally reviewing and responding to fair housing complaints and distributing fair housing information to the real estate industry and posting information in public buildings. To date, no fair housing complaints have been made to the County. Requests for reasonable accommodations are reviewed by the Director or another review authority and fair housing information is distributed to the real estate industry and posted in public buildings.	Modified. Covered under new program 19.

Program		Implementation Status	Action
Program 5.1.1 Continue to pursue funding for owner-occupied rehabilitation efforts. Rehabilitation efforts should include improving the existing stock of mobile home units.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: CDBG, HOME, other federal/state sources Timetable: Annually apply for funds to support existing owner-occupied rehabilitation program	In 2018, the County was awarded $500,000 in HOME Grant funding to be used to assist low-income families purchase their first homes and promote homeownership. However, in response to the COVID-19 pandemic, the County chose to redirect this funding to the TBRA program to better meet the needs of the community during this time. Also in 2018, the County was awarded $700,000 through CDBG for housing rehabilitation in Salton Sea Beach and Heber; each area was awarded $350,000 for these programs. The County is also working with the City of Calipatria to implement their HOME program. The County will continue to pursue funding for housing rehabilitation programs in the future. The County is still working on conditions to begin the program, expected to be completed in 2021, to begin providing TBRA rent assistance and housing rehabilitation.	Modified. Covered under new program 21.
Program 5.1.2 Continue to implement an active code enforcement and building inspection program to identify existing code deficiencies and encourage improvement of existing substandard dwelling units.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds (staff time) Timetable: Ongoing	The County received and responded to 1,043 notices of violations to the County code during the 2014-2021 planning period. Through responding to these violations, the County identified the most common areas of deficiency are the illegal parking of trailers on vacant lots and overgrown vegetation. The County uses this information to educate residents on their responsibilities and identify areas where additional enforcement is necessary.	Modified. Covered under new program 22.

Program		Implementation Status	Action
Program 5.1.3 The County will update its list of subsidized rental properties on an annual basis and identify units at-risk of converting to market rate. The County will contact the owner(s) of any identified at-risk units to determine their interest in selling the property or maintaining the affordability of the units. The County will work with property owners to apply for federal, state, and local subsidies to ensure the continued affordability of at-risk units and will maintain a list of non-profit organizations that may be interested in the acquisition/rehabilitation of at-risk units. The County will make information regarding tenants' rights and conversion procedures, as well as assistance organizations and information regarding other affordable housing opportunities within the County available to tenants of at-risk units.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Update annually, provide assistance as needed	The County relies on data from the California Housing Partnership Corporation to maintain an updated list of subsidized rental properties.	Modified. Covered under new program 23.
Program 6.1.1 Promote the use of energy conservation measures to "weatherize" existing homes as part of the County's rehabilitation program efforts.	Responsible Agency: Planning and Development Services Department Funding Source: CDBG, HOME, General Funds (staff time) Timetable: Ongoing	Through the 2018 CDBG funding application, under the Colonias allocation, the County was awarded funding for housing rehabilitation for Salton Sea Beach and Heber. Each area was awarded $350,000 for these programs.	Continue. Covered under new program 24.
Program 6.1.2 Continue to implement Title 24 Energy Conservation Requirements in housing design and rehabilitation efforts.	Responsible Agency: Planning and Development Services Department	Chapter 1 of Division 10 of the County's Land Use Ordinance (Title 9) establishes that the County will enforce all building regulations of Title 24, including Energy Conservation Requirements.	Delete.

Program		Implementation Status	Action
	Funding Source: General Funds (staff time) **Timetable**: Ongoing		
Program 7.1.1 Facilitate the flow of shared information and experiences regarding special topics between incorporated cities and unincorporated communities (e.g., innovative subdivision processes).	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Coordinate communication annually or as appropriate, shared information is ongoing	The County works closely with both incorporated and unincorporated communities through community meetings and appointing members to Community Districts such as the Seeley Water Board and Heber Water District. Additionally, the County works closely with the Heber Utility District and related projects. The County Building Department manages recreational vehicle (RV) and mobile home parks throughout the county, in both unincorporated areas and on behalf of cities in incorporated areas. The County works directly with cities on issues related to management of this housing, such as responding to comments on projects, complaints, and more.	Modified. Covered under new program 25.
Program 7.1.2 Continue to support the coordination between public agencies through the County's intra- department/agency framework that allows specialist staff to have daily interaction and access to a global computer permitting and monitoring program linked to other development-related departments/agencies.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County supports coordination with public agencies and other inter-departmental coordination through the development process. Most projects include a pre-application meeting, to which the County invites all local and state agencies that are related to the project or may have an interest. Beyond this, and for projects that do not have a pre-application meeting, the County solicits comments from local agencies and other departments during the permitting process and public hearings.	Delete.

Program		Implementation Status	Action
Program 7.1.3 Continue to coordinate with the Imperial Valley Housing Authority to promote housing efforts.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds **Timetable**: Review coordination efforts annually, coordination ongoing	The County works with the Imperial Valley Housing Authority and has an ongoing partnership to promote development of a variety of housing types, with an emphasis on creating and maintaining affordable housing units. As part of this maintenance, the County coordinates services for a mobile home in a park owned by the housing authority. Due to limited funding, the County has been unable to assist in the construction of additional affordable housing in recent years.	Modified. Covered under new program 4.
Program 7.1.4 Coordinate with regional employers to determine appropriate housing types for employees that live in Imperial County.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County coordinates with employers in the region, with a special focus on large projects, to encourage local employment of residents that are already housed in the area. The County provides incentives when employers meet a threshold set on a project-by-project basis for how many employees are local residents rather than attracting new workers in need of temporary housing.	Modified. Covered under new program 25.
Program 7.1.5 Continue to support economic development activities coordinated through the Planning and Development Services Department by providing technical support in the form of service area plan updates. These updates contain a record of undeveloped lands through the creation of residential subdivisions, annexation of land to incorporated cities, and the capacities of water and sewer in the unincorporated areas.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	During the previous planning period, the County supported creation of additional housing through annexations of land for the Lotus Ranch and Miller-Burson developments into El Centro and the Russel Court development into Imperial County. In 2018, the Seeley County Water District released an update to their Service Area Plan finding that, in the Seeley service area, wastewater facilities are operating at 45-percent capacity and water facilities are operating at 20-percent capacity. 1.	Delete.

Program		Implementation Status	Action
		The following have been completed to date: • Winterhaven Public Safety Facility • Subsistence Payments Program • Neighborhood Cleanups • Telemedicine Equipment for Clinicas de Salud del Pueblo • Library Needs Assessment (TA) • Poe Colonia Wastewater Plant Improvements • Palo Verde Water Well #1 Improvements • Seeley Water Line Distribution System Improvements The following projects are in progress: • Winterhaven Water Treatment Plant Improvements • Niland Public Safety Facility The 18 CDBG grants were just received a few months ago. The County needs to clear general conditions and get approval from the state before they begin. The County is currently working on general conditions. These projects include: • Seeley Fire Station • Palo Verde Water Well #2 Improvements • Heber Housing Rehabilitation • Salton Sea Beach Housing Rehabilitation No projects have been completed under housing rehabilitation as of yet since the	

Program		Implementation Status	Action
		County is still working on conditions to begin the programs.	
Program 8.1.1 Continue to improve the planning permit processing procedures by improving information retrieval capabilities of counter and project staff, continuing pre-application meetings, and providing updated written materials, such as checklists and application forms with fee and standards guidelines to developers. Continue to apply mandatory time frames for application review. The County's updated website features a function that will allow developers to track their projects through the permit processing procedures.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing as projects are submitted to the Planning Department	The County has implemented streamlining for solar (i.e. rooftop solar for on-site consumption) in the Zoning Ordinance, is undergoing a review of permit procedures for industrial development, and intends to complete a review of residential permitting procedures next. During each of these reviews, the County has analyzed input from the public and developers on permit processing procedures as well as reviewed the Zoning Ordinance for constraints on development that may result in delays.	Modified. Covered under new program 27.
Program 8.1.2 The County will consider updating community and urban area plans as staff develops a timeline for completing them.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: 2014-2021	Due to a lack of funding, the County was unable to update community and urban area plans in the previous planning period. However, County contracted a consultant at the end of 2020 to assist with local and regional planning (LEAP/REAP) grant applications and plans to use the funding, if received, to assist with community plan updates.	Modified. Covered under new program 27.
Program 8.1.3 Increase the use of the clustered Planned Residential Development (PRD) approach by lowering the minimum land area required for a PRD project. The PRD usually allows higher densities than conventional subdivisions and, through clustering, can reduce infrastructure costs. This will be achieved through the Specific Plan process so developers can select sites to apply the PRD.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Case-by-case basis; ongoing	The County did not use clustered PRD during the previous planning period, and instead encourages higher density for housing through Specific Plans. Three Specific Plans were processed during the previous planning period: McCabe Ranch, Rancho Los Lagos, and 101 Ranch.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 8.1.4 Continue to permit landowners to build on lots of record that are currently below the minimum lot size, but only where such construction does not create land use conflicts, such as with existing agricultural operations.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 4, Section 90804.01, of Division 8 of the County's Land Use Ordinance (Title 9) specifies that lots smaller than the applicable parcel size can still be developed under specific requirements: the parcel boundaries were determined prior to the establishment of the current minimum parcel size or a subdivider agrees to surrender development rights of a portion of a minor subdivision such that the reduced lot sizes will not result in increased density than otherwise permitted. The Planning Director or Planning Commission may also approve a parcel map of no more than four parcels where one or all parcels are smaller than the applicable minimum parcel size if there are existing small parcels in the same area that meet requirements outlined in Section 90804.01.	Modified. Covered under new program 28.
Program 8.1.5 Continue to use the International Conference of Building Officials (ICBO) to ensure a set of consistent codes. In addition, model codes shall be periodically evaluated for new information on technological advances.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	The County enforces Title 24, the California Building Standards Code, updated regularly as the State updates the code to ensure new information and technological advances are included and enforced.	Delete.
Program 8.1.6 Review building codes periodically to incorporate the most economical construction alternatives consistent with health and safety.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time)	The County enforces Title 24, the California Building Standards Code. The California Building Standards Codes are updated every three years to ensure consistency with health and safety codes and promote the most economical construction alternative. By enforcing these updated codes, the County ensures their	Modified. Covered under new program 5.

Program		Implementation Status	Action
	Timetable: Review annually	building code addresses construction alternatives, health, and safety.	
Program 8.1.7 Encourage projects for special-needs groups and for lower- and moderate-income households by using the appropriate County ordinance to permit reduced lot sizes, reduced site setbacks, and off-street parking, thereby reducing land costs for private-sector housing developments. This will be implemented through ensuring all staff are fully knowledgeable of potential development standard reductions through the monthly staff meeting process.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County works closely with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to pursue opportunities for development of new transitional and supportive housing, as well as other housing types for special-needs groups. Many community organizations work directly with Board members to identify sites and incentives necessary to promote development of housing for special needs groups, such as flexibility in development standards. The County and these groups have identified suitable sites, but none have been developed. The County will continue the intent of this program through incentives to encourage special needs housing.	Modified. Covered under new program 9.

III. Goals, Policies, and Programs

This section of the Housing Element presents Imperial County's goals, policies, and programs relative to the development, improvement, and maintenance of housing within the unincorporated areas of the county, for the planning period of 2021 to 2029.

In general, housing goals are a long-term end in which action is directed. Imperial County's goals are ideals that have been determined by the citizens as desirable and deserving of community time and resources. Policy statements are more specific and shorter range. Programs are action statements and provide well-defined guidelines for decision-making and identify the entity responsible for implementation, funding sources, the time frame for completion, and quantified objectives.

Goal 1: Ensure the availability of a variety of housing types for all income levels throughout the county.

Policies

1.1 Provide for an adequate supply of housing in suitable locations and with adequate services that collectively accommodate a range of housing types, sizes, and prices meeting the needs of all economic segments of the county's population.

1.2 The County shall allow housing developments with at least 20-percent affordable housing by-right on lower-income housing sites that have been counted in previous Housing Element cycles, consistent with Assembly Bill 1397. (New policy)

Programs

1. Meeting the Regional Housing Needs Allocation

   The County will ensure adequate sites are available at all times throughout the planning period to meet the County Regional Housing Need for each income category capacity consistent with no net loss and identify additional sites as needed consistent with California Government Code Section 65863.

   Responsible Agency: *Planning and Development Services Department*

   Funding Source: *General Funds (staff time)*

   Timeframe: *Ongoing, throughout the planning period*

2. Infrastructure Availability and Coordination

   The County shall work with community service districts to identify and overcome constraints to providing water and sewer service for housing, prioritizing improvements for lower-income housing and in low-resource areas to further place-based revitalization efforts. The County will:

- Coordinate every two years with service providers to assess the needs for infrastructure and services and discuss and assist in implementation of plans for expansion based on future proposed developments.
- Apply for funding from the Community Development Block Grant, Infill Infrastructure Grant Program, or other funding programs, as available, to fund design plans and infrastructure improvements for affordable housing projects.
- Annually pursue funding opportunities for specific plan updates as necessary to promote development within existing communities with active transportation and access to services and amenities.
- Provide a copy of the adopted Housing Element to the various service providers serving the unincorporated communities and provide assistance to providers to facilitate establishing procedures to grant priority service to the development of housing with units affordable to lower-income households.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Coordinate with service providers every two years and identify infrastructure constraints by May 15, 2023; Fund and conduct infrastructure improvements dependent on grant funding availability. Explore and pursue Notices of Funding Availability (NOFAs) annually. Re-evaluate progress and effectiveness of implementation in 2025 and make appropriate adjustments within 6 months.*

Quantified Objective: *Expansion of water and sewer services in underserved areas to promote place-based revitalization and accommodate the development of at least 1,000 lower-income units within the planning period. Target areas of concentrated need as identified through the Colonia Master Plan update (Program 4).*

3. Specific Plan Development

Continue to encourage planned developments through the Specific Plan development agreement process to achieve innovative housing designs; facilitate the integration of affordable housing and mixed-income settings in new growth Specific Plan areas.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing as Specific Plan applications are processed.*

Quantified Objective: *287 lower-income units in a mixed-income and mixed-use specific plan development to promote access to opportunity for lower-income households and facilitate housing mobility in higher resource areas*

4. Colonia Master Plan

Conduct an infrastructure needs assessment in colonias to update the Colonia Master Plan and identify specific issues in unincorporated communities. Conduct an in-person survey of residents to determine needs, barriers to investment and healthy living conditions, and record existing conditions in each colonias. Based on the findings of the assessment and survey, develop and implement a targeted program to prioritize public investment in basic infrastructure in areas of concentrated need to create safe and healthy living environments. Strategies to implement place-based revitalization may include, but are not limited to:

- Expand or improve water, sewer, and other facilities;
- Construct sidewalks, curbs, and gutters;
- Conduct an assessment of existing structures for inadequate plumping, assist owners in identifying funding to address deficiencies and explore and pursue funding opportunities and partnerships to address needs;
- Acquire vacant and abandoned housing units and work with non-profits to rehabilitate these units per Program 5; and
- Explore and pursue other housing and community development needs and amenities.

Responsible Agency: *Workforce and Economic Development, Planning and Development Services Department*

Funding Source: *REAP*

Timeframe: *Survey the residents and conditions of a minimum of two colonias annually, beginning in 2022; within 1 year of assessment of each colonia develop and implement a targeted program to invest in public infrastructure to promote public health, welfare, and safety.*

Quantified Objective: *Connect* 250 *colonia residents (*target 150 homes for infrastructure improvements) *with resources and funding to improve the conditions of their home to facilitate place-based revitalization and encourage housing mobility through a stabilized housing stock.*

Goal 2: Encourage affordable housing developments by using all available funding sources, offering developer incentives, and allowing a wide range of housing types to serve the housing needs of the county's labor force, special-needs groups, and families of all income levels.

Policies

2.1 Continue to use existing financing services and to stimulate the development of innovative financial techniques that will reduce housing.

2.2 Facilitate the creation of affordable housing units and offer incentives for developers to create housing for all income levels, to reflect Imperial County's share of the region's housing needs.

Programs

5. Acquisition, Rehabilitation, and Construction of Affordable Housing

Work with public or private sponsors, as well as the Imperial Valley Housing Authority, to support the acquisition/rehabilitation of existing multifamily units to be converted to affordable housing. Provide technical assistance in funding acquisition, rehabilitation, and/or the construction of affordable housing units by assisting with developing innovative and cost-effective construction methods including the use of solar energy, xeriscaping, and green building materials. The intent of this is to reduce displacement risk for lower-income households by increasing the supply of affordable housing.

Responsible Agency: *Planning and Development Services Department; Imperial Valley Housing Authority*

Funding Source: *HOME and other United States Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD) grants as they become available, Community Development Block Grant (CDBG), General Fund (staff time)*

Timeframe: *Annually meet with interested developers to identify and pursue opportunities.*

Quantified Objective: *Facilitate place-based revitalization through acquisition and conservation of 100 units for affordable housing, provide rehabilitation assistance for 100 low-income units. Encourage 30 of these units to be in areas of concentrated rehabilitation need and 30 in areas of concentrated poverty.*

6. Review County Processes, Procedures, and Development Costs

Biannually review the County's building code, zoning ordinance, subdivision ordinance, and processing procedures to identify and modify process requirements, approval of criteria, and/or fees that could create an impediment to the cost of housing. Encourage innovative and cost-effective construction

methods to reduce housing costs by providing incentives such as density bonus units, reduction in development standards, and fee waivers/deferrals, and assisting in accessing state and federal subsidies. The County will also continue to contract with outside firms to perform plan check reviews for more complex projects to provide timely development approvals.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: Biannually review and update, as necessary.

7. Update Density Bonus *(Previously Program 2.2.2)*
The County will amend Division 3 of Title 9 to comply with changes in California's density bonus law (California Government Code Section 65915, as revised) and will promote the use of density bonuses for lower-income units by providing information through a brochure in County buildings and on the County's website.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Amend Division 3 within one year of Housing Element adoption.*

Quantified Objective: *30 lower-income units*

8. Development Standards
The County will amend the Land Use Ordinance Title 9 to address the following development standards:

   a. Accessory Dwelling Units. Allow ADUs by-right in all zones in which single family or multi-family residential uses are permitted, regardless of if the residence is the primary use, in compliance with Government Code Section 65852.2.

   b. Emergency Shelter Parking. Allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii)).

   c. Manufactured Housing. Permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings in compliance with Government Code Section 65852.3(a)

   d. Employee Housing. Treat employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses and treat employee/farmworker housing consisting of no more than 12 units or 36 beds as an

agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with Health and Safety Code Sections 17021.5 and 17021.6.

e. Multifamily Parking Requirements. The County will review parking requirements for smaller multi-family units, including studios and one-bedrooms, to determine if current requirements constrain development of units of this size. Based on findings, the County will revise Division 4 as necessary.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Amend the Land Use Ordinance within one year of Housing Element adoption. Review parking standards and revise within one year of adoption of the Housing Element.*

9. ADU Incentives

The County shall promote accessory dwelling units as an affordable housing option and an economic mobility opportunity in Imperial County through the following actions.

- Promote ADUs on existing residential lots by providing information to homeowners about the benefits of accessory dwelling units (ADUs) and/or junior accessory dwelling units (JADUs).
- Provide bilingual (English and Spanish) guidance and educational materials for building ADUs/JADUs on the County's website and in a brochure available at County buildings, including permitting procedures and construction resources. Additionally, the County shall present homeowner associations with the community and neighborhood benefits of accessory dwelling units, inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are contrary to state law, and ask homeowner associations to encourage such uses.
- Explore options for establishing a loan program to help homeowners finance the construction of ADUs. The County shall consider incentives to encourage homeowners to deed restrict ADUs for lower-income households.
- Develop a streamlined permit review procedures and standards for ADUs, including offering assistance with the permitting process both online through the County's website and in-person.
- Develop and implement a monitoring program that will track ADU approvals and affordability. The County will use this monitoring program to track progress in ADU development and adjust or expand the focus of its education and outreach efforts through the 2021-2029 planning period. The County will evaluate ADU production and affordability two years into the planning period (2023), and if it is determined these units are not meeting the lower-income housing need, the County shall ensure other housing sites are available to accommodate the unmet portion of the lower-income RHNA. If additional sites must be rezoned, they will be consistent with Government Code Sections 65583(f) and 65583.2(h).

- Prepare a selection of pre-approved ADU plans to assist with streamlining and reduce permitting costs.
- Emphasize marketing of ADU guidance and materials in areas of high opportunity to encourage the development of new affordable housing in areas of opportunity as a strategy to enhance mobility and reduce displacement of low-income households seeking affordable housing options.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Fund (staff time)*

Timeframe: *Develop ADU informational materials, develop a streamlined permit review procedures and standards, develop, and implement a monitoring program that will track ADU approvals and affordability and prepare a selection of pre-approved plans within two years of Housing Element adoption.*

Quantified Objective: *20 lower-income ADUs: 10 in areas of concentrated poverty and 10 in high resource areas to provide housing mobility opportunities and reduce displacement risk for lower-income households.*

10. Housing for Special-Needs Groups

Increase the supply of affordable housing for special-needs groups, including seniors, persons with disabilities, and extremely low-income individuals and families, by providing regulatory incentives such as permitting reduced lot sizes, reduced site setbacks, and off-street parking to lessen land costs for housing development. The County will take subsequent action, as appropriate, to make the development of such units more financially feasible, including supporting the use of federal and state funding resources for local housing needs and programs and providing financial incentives, such as reducing, waiving, and/or deferring fees, where feasible, offering fast-track/priority processing, and density bonuses.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds, Serna, CDBG*

Timeframe: *Ongoing as applications are received, identify whether there is a need for subsequent action by July 2024.*

Quantified Objective: *75 lower-income units to reduce displacement risk; 30 of which in high resource areas to facilitate access to opportunity and housing mobility opportunities*

11. Farmworker Assistance

To provide housing and meet the needs of farmworkers, the County will implement the following:

- Continue to seek funding from the Joe Serna Jr. Farmworker Housing Grant Program (Serna) for the rehabilitation of existing farmworker units and the construction of new units.
- Meet biennially with agricultural employers and developers of affordable housing to identify sites and funding sources available through the California Department of Housing and Community Development (HCD) and the United States Department of Agriculture (USDA) Rural Development programs for farmworker housing and partner on development opportunities including incentives and support of funding applications.
- Complete a farm working survey to better understand the living conditions and daily service needs of the farm worker population to inform place-based revitalization efforts. Based on results, develop and implement a targeted program within 3 years to work with farmworker employers, service providers, and developers to identify funding and pursue development opportunities to improve housing conditions and promote the availability of rehabilitation assistance in farmworker communities.
- Encourage place-based revitalization and reduce displacement risk by organizing bilingual outreach materials and activities to educate and inform the farm worker community about available rehabilitation programs and resources. Provide materials annually to community groups and districts to distribute to members.
- When funding allows, provide relocation assistance for farmworkers displaced due to rehabilitation efforts.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds, Serna, CDBG*

Timeframe: *Make bilingual resources available by June 2022; complete the survey by June 2023; apply for funding annually, as NOFAs are released.*

Quantified Objective: *Reduce displacement risk through the rehabilitation of 50 farmworker units and facilitate long-term place-based revitalization through the results of the farm working survey.*

12. Assistance for Service Providers

The County will assist and support local social service agencies in their applications for state and federal funds to provide housing-related services to lower-income households and special-needs groups, particularly those offering supportive housing programs for homeless individuals and families.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing or as requested. Annually promote the availability of assistance to local service providers to increase awareness.*

Quantified Objective: *Support the construction of 20 units in supportive housing facilitates and connect 32 eligible households with local social services.*

Goal 3: Continue to facilitate the provision of housing suited to persons with special housing needs.

Policy

3.1 Provide the appropriate regulatory framework, funding availability, and other necessary services for the creation of housing for persons with special needs, which include large families, farmworkers, the elderly, persons with disabilities and developmental disabilities, single-parent families, extremely low-income households, and the homeless.

Programs

13. Support Affordable Housing Development

The County shall work with housing developers to expand opportunities for affordable lower-income and workforce housing by creating partnerships, providing incentives, and pursuing funding opportunities, with a particular emphasis on developing affordable housing in high resource areas to promote mobility between low and high resource areas. Specifically, the County shall:

- Provide technical assistance with site identification, site acquisition, and permit processing procedures.
- Promote the use of the density bonus ordinance, application processing fee waivers, impact fee waivers, and fee deferrals to encourage affordable housing, with an emphasis on encouraging affordable housing in high resource areas.
- Facilitate the approval process for land divisions, lot line adjustments, and/or specific plans or master plans resulting in parcel sizes that enable affordable housing development and process fee deferrals related to the subdivision for projects affordable to lower-income households.
- Partner with nonprofit and for-profit affordable housing developers and self-help housing providers to provide technical assistance and support their financing applications for state and federal grant programs, tax-exempt bonds (e.g., Mortgage Revenue Bonds), and other programs that become available.
- Pursue federal, state, and private funding for low- and moderate-income housing by applying for state and federal monies for direct support of lower-income housing construction and rehabilitation, specifically for development of housing affordable to extremely low-income households.
- Increase the use of the clustered Planned Residential Development (PRD) approach by lowering the minimum land area required for a PRD project to reduce infrastructure costs through clustering.

- Encourage construction of larger housing units with three or more bedrooms by considering the allowance of parking reduction, fee waivers, and other incentives.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time), California Housing Finance Agency (CHFA), HOME funds, CDBG funds, Technical Assistance grants*

Timeframe: *Meet with developers annually, apply for funding annually as available.*

Quantified Objective: *150 low-income; 150 very low-income; 50 extremely low-income units. Half of these will be in high resource areas to promote access to services and opportunity, the remainder will be in low-resource areas with a shortage of affordable housing.*

14. Community Assistance Programs

Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services offices and on the County's website. Invite organizers of community assistance programs to present their services at least annually at public meetings and workshops.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Review information and update quarterly, distribution ongoing*

Quantified Objective: *Connect 20 eligible persons or households with local community assistance programs and/or homeless services to facilitate housing mobility for persons in these populations.*

15. Regional Coordination on Homelessness

Collaborate with the Imperial Valley Continuum of Care and other nonprofit organizations that provide emergency shelter and other support services to promote community-wide planning and strategic use of resources to address homelessness. Assist emergency shelters/transitional housing providers in acquiring state, federal, and local funding for services for the homeless.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, and coordination at least annually throughout the planning period*

Quantified Objective: *Facilitate improved access to opportunity and resources and connect 10 persons experiencing or at-risk of homelessness with services.*

16. Land Use Ordinance Title 9 Amendments

The County will remove barriers to housing for special-needs groups by amending the Land Use Ordinance Title 9 to address the following:

a. Transitional and Supportive Housing. Allow transitional and supportive housing as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone and to allow supportive housing as a permitted use without discretionary review in zones where multifamily and mixed-use developments are permitted, including nonresidential zones permitting multifamily uses, in compliance with California Government Code Section 65583(c)(3).

b. Definition of Family. Update the definition of family to be "one or more persons living together in a dwelling unit."

c. Residential Care Facilities. Allow residential care facilities for six or fewer persons in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for seven or more persons in the same manner in accordance with the State's definition of family.

d. Low-Barrier Navigation Centers. Allow low-barrier navigation centers for the homeless by-right in zones that allow for mixed-use and nonresidential zones permitting multifamily uses, per California Government Code Section 65662.

e. Domestic Violence Shelters. Remove use permit requirements for facilities for abused men/women/children in compliance with the definition of supportive housing, in compliance with Health and Safety Code Section 50675.14.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Amend the Land Use Ordinance within one year of Housing Element adoption.*

17. Persons with Disabilities

Ensure that persons with disabilities (including persons with developmental disabilities) have increased access/placement in residential units rehabilitated or constructed through County programs by completing the following:

- Continue to ensure new developments are compliant with standards outlined in the Americans with Disabilities Act (ADA) for persons with disabilities.
- Encourage "universal design" features, such as level entries, larger bathrooms, and lower kitchen countertops to accommodate persons with disabilities.

- Encourage multifamily housing developers to designate accessible and/or adaptable units to be affordable to persons with disabilities or persons with special needs.
- Cooperate with nonprofit agencies that provide placement or referral services for persons with disabilities.
- Coordinate with the San Diego Regional Center, particularly the Imperial Valley office, and local hospitals to promote outreach efforts that inform families in the county on housing and services available for persons with developmental disabilities.
- Review and revise the County's findings for approving reasonable accommodation requests, including, but not limited to, potential impact on surrounding uses, physical attributes of the property and structures, and any other findings that may be potential barriers to housing for persons with disabilities.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as projects are processed and review and revise the County's findings for approving reasonable accommodation requests by December 2022.*

18. Development of Housing for Extremely Low-Income Households

To address the extremely low-income housing need and to ensure compliance with Assembly Bill (AB) 2634, the County Land Use Ordinance Title 9 will continue to explicitly allow single-room occupancy units (SROs) as permitted uses in the Medium-High Density Residential (R-3), High-Density Residential (R-4), General Commercial (C-2), and Limited Agricultural (A-1) zones. Additionally, the County will encourage the development of housing for extremely low-income households through a variety of activities, such as outreach to housing developers every 12 to 18 months, providing financial assistance (when feasible) or in-kind technical assistance or land write-downs, providing expedited processing, identifying grant and funding opportunities, applying for or supporting applications for funding on an ongoing basis, reviewing and prioritizing local funding at least twice in the planning period, and/or offering additional incentives beyond the density bonus.

Responsible Agency: *Planning and Development Services Department, Imperial County Workforce and Economic Development Department*

Funding Source: *General Fund (staff time), HOME and other HUD and HCD grants as they become available.*

Timeframe: *Ongoing, as projects are processed, and annual outreach with local developers.*

Quantified Objective: *40 extremely low-income units in areas of concentrated poverty to reduce displacement risk*

Goal 4: Facilitate the provision of fair housing opportunities for all residents of Imperial County.

Policy

4.1 Provide the appropriate regulatory framework, funding availability, and other necessary services for the creation of housing for persons with special needs, which include large families, farmworkers, the elderly, persons with disabilities and developmental disabilities, single-parent families, extremely low-income households, and the homeless.

Programs

19. Fair Housing Outreach

To reduce any potential for housing discrimination and to improve residents' access to opportunities and programs, the County will:

- 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.
- Coordinate with local fair housing providers to conduct a public workshop on tenant and landlord rights and responsibilities.
- Work with fair housing providers biannually to review discrimination cases and complaints to identify any trends in the county.
- As staff capacity and budget allows, conduct a survey of and respond to resident needs and preferences, including best ways to conduct future outreach.

Continue to refer discrimination inquiries to the appropriate fair housing agency, including the Inland Fair Housing and Mediation Board and California Rural Legal Assistance on an ongoing basis.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Update and redistribute assistance program information quarterly or as needed, meet biannually with fair housing provider to plan a workshop; refer discrimination cases as received. Complete a housing conditions survey within 3 years, if funding is available.*

Quantified Objective: *Provide education on fair housing laws, rights, and responsibilities to 30 landlords and 50 tenants.*

20. Improve Low-Resource Areas Access to Opportunities

The County shall improve low-resource areas to increase access to opportunity for lower-income households by conducting the following:

- Meet biannually with Imperial County Transportation Commission, and other transit providers as applicable, to identify unmet transit needs and increase mobility and provide increased transit from unincorporated communities to schools.
- If an unmet transit need is identified while meeting with the Commission, annually apply for funding opportunities for improved transit service, particularly around areas with lower-income sites and communities on the western shore of the Salton Sea.
- Allow for employment centers to be located near housing developments to increase job opportunities.
- Annually distribute materials with utility bills to promote the CalWorks program offered by the County in rural areas of the unincorporated County to improve access to employment training, assistance, and job opportunities; emphasize marketing of this program in areas with higher rates of single-parent households.
- Increase community services in low-resource areas, such as public libraries and parks.
- Review existing zoning within one year of Housing Element adoption to ensure medical services are allowed throughout the County, specifically in low-resource areas.
- Review existing zoning within one year of Housing Element adoption to ensure grocery stores are allowed in low-resource areas.
- Meet annually with the Imperial Valley Environmental Justice Taskforce to identify steps the County can take to improve environmental conditions for all residents.
- Develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities within the county, provide information on this program to realtors and housing providers.
- To achieve public participation target lower-income and special needs households and neighborhoods with higher concentrations of lower-income households are included in public participation efforts, target stakeholders or other organizations that represent lower-income and special needs households or establish a committee representative of lower-income households in future public outreach efforts.
- Apply for funding through the Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP), as NOFAs are released, to convert mobilehome parks to ownership units or put in the control of a resident organization, nonprofit housing sponsor, or local public entity.

Use this funding on mobilehome parks in concentrated areas of poverty as well as in areas of opportunity to provide affordable ownership opportunities for housing mobility.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as identified in each bullet.*

Quantified Objective: *Provide opportunities to low resource areas to assist at least 20 extremely low-income households, 20 very low-income households, 20 low- income households.*

Goal 5: Encourage the improvement, rehabilitation, and revitalization/reinvestment of the county's existing residential neighborhoods.

Policy

5.1 Ensure that the quality, safety, and livability of the housing stock in the county are continually maintained or upgraded and that dilapidated housing that cannot be improved is replaced, where appropriate and necessary.

Programs

21. Housing Rehabilitation

The County will seek appropriate funding through the CalHome Program and the CDBG Program to provide housing rehabilitation loans and weatherization services for extremely low-, very low- and low-income households and for single family, multifamily, and mobile home units. Funds will be available to both owner-occupied units and owners of tenant-occupied units and marketed through multilingual outreach materials to educate and inform all residents on the available rehabilitation programs and resources. When funding allows, the County will also provide relocation assistance for occupants displaced due to rehabilitation work. Additionally, as feasible, the County will conduct a housing conditions survey, including assessing replacement and rehabilitation need in mobile home parks.

Responsible Agency: *Planning and Development Services, Imperial Valley Housing Authority*

Funding Source: *CDBG, HOME, other federal/state sources*

Timeframe: *Annually apply for funds to support existing owner-occupied rehabilitation program. Complete a housing conditions survey within 3 years, if funding is available.*

Quantified Objective: *Reduce displacement risk for 100 lower-income units, 80 of which in areas of concentrated poverty to encourage place-based revitalization*

22. Code Enforcement

Continue to implement a proactive code enforcement and building inspection program through the Planning and Development Services Department to identify existing code deficiencies and encourage improvement of existing substandard dwelling units and mobile homes to eliminate substandard conditions and address areas of concentrated rehabilitation need, which could result in repairs and mitigate potential costs, displacement, and relocation impacts on residents. Emphasize enforcing healthy and safety compliance for farmworker and transitional housing. The County will provide brochures in both English and Spanish on the County's website regarding the code enforcement process and available resources to assist with rehabilitation.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Make brochures available by July 2022, implement code enforcement process on a proactive basis.*

Quantified Objective: *Reduce displacement risk by facilitating rehabilitation of 50 units by connecting owners with available assistance programs.*

23. At-Risk Properties

The County will update its list of subsidized rental properties on an annual basis and identify units at risk of converting to market rate. For complexes or units are risk of converting to market rate, the County shall:

- Contact the owner(s) of any identified at-risk units within one year of affordability expiration to discuss the desire to preserve complexes as affordable.
- Reach out to owner(s) to determine their intent to maintain the affordability of the units' interest in selling the property. In addition, the County will coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with property owners to apply for federal, state, and local subsidies to ensure the continued affordability of at-risk units and maintain a list of non-profit organizations that may be interested in the acquisition/rehabilitation of at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Annually monitor and apply for funding as Notices of Funding Availability are released.*

Quantified Objective: *24 lower-income units*

Goal 6: Promote sustainable development by encouraging the inclusion of energy conservation features in new and existing housing stock.

Policy

6.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation.

Programs

24. Energy Efficiency and Conservation

Promote the use of energy efficiency and conservation through measures to weatherize existing homes through informational brochures available at County buildings and continuing to implement Title 24 Energy Conservation Requirements in housing design and rehabilitation efforts.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *CDBG, HOME, General Funds (staff time)*

Timeframe: *Make information available on the County's website and in brochures in public buildings by December 2022 and implement as applications for new construction and rehabilitation are received.*

Goal 7: Encourage and facilitate the regional coordination of public agencies and business organizations to maximize public and private-sector resources that will support a vibrant community.

Policy

7.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation.

Programs

25. Regional Coordination

Facilitate regional coordination with employers, housing and service providers, and incorporated cities and unincorporated communities to encourage shared information and experiences and to develop regional plans to address housing needs.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Invite regional stakeholders to a biannual meeting and facilitate distribution of shared information as available.*

Goal 8: Pursue actions to reduce regulatory constraints to housing that impede housing opportunities.

Policy

8.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation and noise abatement, including implementing Goals 1, 2, and 3 of the County's General Plan Noise Element.

Programs

26. Development Streamlining

Review and update policies and requirements of Division 3 of the County's Land Use Ordinance Title 9 and community design elements of various community and urban area plans to ensure development standards are objective. The County shall only deny a development project based on development standards if such standards are objective, quantifiable, written development standards, conditions, and policies.

Additionally, the County will establish a written policy or procedure and other guidance as appropriate to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects, as set forth under California Government Code Section 65913.4. The County will also continue to improve planning permit processing procedures by improving information retrieval capabilities of counter and project staff, continuing pre-application meetings, applying mandatory time frames for application review, and providing updated written materials such as checklists and application forms with fee and standards guidelines to developers. The County's updated website features a function that will allow developers to track their projects through the permit processing procedures.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Establish a SB 35 process by December 2022, implement as projects are submitted to the Planning Department*

Quantified Objective: *20 low-income units*

27. Small Lot Development

Continue to permit landowners to build on lots of record that are currently below the minimum lot size, but only where such construction does not create land use conflicts, such as with existing agricultural operations. Additionally, to assist with development of affordable housing, the County will help facilitate lot consolidations to combine small residential lots into larger developable lots by providing information

on development opportunities and incentives for lot mergers to accommodate affordable housing units on the County's website and discussing with interested developers. As developers/owners approach the County interested in lot consolidation for the development of affordable housing, the County will offer the following incentives on a project-by-project basis:

- Allow affordable projects to exceed the maximum height limits,
- Lessen setbacks, and/or
- Reduce parking requirements.

The County will also consider offsetting fees (when financially feasible) and concurrent/fast tracking of project application reviews to developers who provide affordable housing.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as projects are processed through the Planning and Development Services Department. Annually meet with local developers to discuss development opportunities and incentives for lot consolidation.*

Quantified Objective: *Encourage development of 40 lower-income units in high resource areas.*

28. Large Lot Development

To facilitate the development of large lots for affordable housing and provide for development phasing for development of 50 to 150 units, the County will give high priority to processing housing developments that include affordable housing units on lots larger than 10 acres and provide incentives on a case-by-case basis for development of high-density residential on large sites.

Additionally, to ensure the program is successful, the County will reach out to developers annually, and as projects are processed, of affordable housing and incorporate necessary strategies such as ministerial lot splits or other incentives to encourage parceling at appropriate sizes (e.g., 1-10 acres) to facilitate affordable developments.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Fund (staff time)*

Timeframe: *Ongoing, as projects are processed through the Planning Department and incentives will be adopted within one year of adoption of the Housing Element. Annually meet with developers.*

Quantified Objective: *550 lower-income units integrated with moderate- and above moderate-income units to promote housing mobility opportunities, equitable access to resources, and mixed-income neighborhoods.*

Quantified Objectives

State Housing Law requires that each jurisdiction establish the projected number of housing units that will be constructed, rehabilitated, and preserved over the planning period. The Quantified Objectives for the Housing Element reflect the planning period from October 15, 2021, through October 15, 2029. Refer to Table 1.

It is important to note that while the Quantified Objectives are required to be part of the Housing Element and the County will strive to obtain these objectives, the County cannot guarantee that these needs will be met given limited financial and staff resources, the current development climate in the county, and the changing gap in the affordability of housing resources and incomes. Satisfaction of the County's share of regional housing needs will depend heavily on the cooperation of private funding sources and developers, as well as resources of the state, federal, and County programs that are used to support the needs of the lower-income and special-needs households. Additionally, outside economic forces heavily influence the housing market. Current economic challenges have chilled much of the activity in the new housing market. The Quantified Objectives assume optimum conditions for the production of housing; however, environmental, physical, and market conditions exert influence on the timing, type, and cost of housing production in a community. State law recognizes that a locality may not be able to accommodate its regional fair-share housing need.

TABLE 1

QUANTIFIED OBJECTIVES, 2021-2029

	Program	Extremely Low	Very Low	Low	Moderate	Above Moderate
	RHNA	**601**	**602**	**596**	**580**	**1,922**
	New Construction					
2	Infrastructure Availability and Coordination	250	250	500		
3	Specific Plan Development*	15	50	222		
5	Acquisition, Rehabilitation, and Construction of Affordable Housing	0	0	50	0	0
7	Update Density Bonus	5	10	15	0	0
9	ADU Incentives	5	5	10	4	1
10	Housing for Special-Needs Groups	15	20	40	0	0
12	Assistance for Service Providers	15	15	22	0	0
13	Support Affordable Housing Development	50	150	150	0	0
18	Development of Housing for Extremely Low-Income Households	40	0	0	0	0
26	Development Streamlining	5	5	10	0	0
27	Small Lot Development	5	10	25	0	0
28	Large Lot Development	100	200	250		
	Rehabilitation					
11	Farmworker Assistance	20	20	10	0	0

Program		Extremely Low	Very Low	Low	Moderate	Above Moderate
21	Housing Rehabilitation	25	25	50	0	0
22	Code Enforcement	0	15	25	10	0
Conservation						
4	Colonia Master Plan	50	75	125	0	0
5	Acquisition, Rehabilitation, and Construction of Affordable Housing	50	50	100	0	0
23	At-Risk Properties	0	0	24	0	0
19	Fair Housing Outreach	10	20	20	15	15

Source: Imperial County, 2021
**Program 28 accounts for Specific Plan units as well and is therefore not included here to avoid duplication.*

IV. Public Participation

State law requires cities and counties to make a "diligent effort" to achieve participation by all segments of the community in preparing a Housing Element (California Government Code Section 65583(c)(6)). State law requires cities and counties to take active steps to inform, involve, and solicit input from the public, particularly groups and organizations representing the interests of lower-income and minority households that might otherwise not participate in the process.

To meet the requirements of state law, Imperial County has completed public outreach and encouraged community involvement, as described herein.

Stakeholder Consultations

To ensure that the County was soliciting feedback from all segments of the communities in unincorporated Imperial County and to target stakeholders and other organizations that represent lower-income and special needs households, consultations were conducted with service providers and other stakeholders who represent different socio-economic groups. Between January and February 2021, Imperial County reached out to 10 agencies through several attempts. Of these, three responded and consultations were conducted with stakeholders to offer the opportunity for each to provide one-on-one input. The following stakeholders were interviewed:

- Campesinos Unidos – January 26, 2021
- Imperial Valley Housing Authority – February 9, 2021
- Imperial County Department of Social Services – February 12, 2021

In each of the consultations, the stakeholders were asked the following questions:

1. What are the three top opportunities you see for the future of housing in unincorporated Imperial County? What are your three top concerns for the future of housing in unincorporated Imperial County?

2. What types of housing do your clients prefer? Is there adequate rental housing in the unincorporated areas of Imperial County? Are there opportunities for home ownership? Are there accessible rental units for seniors and persons with disabilities?

3. Where have your clients been able to afford housing, if at all? What continues to be a struggle in allowing your clients/people you serve to find and keep affordable, decent housing?

4. What are the biggest barriers to finding affordable, decent housing? Are there specific unmet housing needs in the unincorporated communities?

5. How do you feel about the physical condition of housing in Imperial County? What opportunities do you see to improve housing in the future?

All stakeholders emphasized a shortage of affordable housing units and a great demand for rental assistance, beyond what is currently available. When asked about other concerns, stakeholders reiterated that addressing housing barriers in Imperial County begins with meeting affordability needs and incentivizing this type of housing should be a priority. Stakeholders expressed concern that the shortage of affordable housing presents challenges for residents to access jobs and live in safe, healthy conditions. Comments received through the consultation process were used to inform updates to the Housing Element goals, policies, and programs and in the assessment of fair housing issues.

Community Workshops

On April 27 and April 28, 2021, the County hosted two online community workshops to introduce the public to the Housing Element update process and state requirements and solicit input on housing needs, preferences, and locations. The County provided advanced notice of these meetings by distributing flyers in both English and Spanish to stakeholder organizations, affordable housing providers, and community organizations. At each meeting, conducted via Zoom, the County offered a Spanish-language breakout room in addition to the English presentation, though no attendees took advantage of this option.

The April 27 meeting was held online over the standard lunch break and had 11 attendees. Participants asked about a potential partnership between the County and San Diego State University to discuss student housing needs at a proposed campus near the City of Brawley and whether family units are being lost as they are converted to farm labor (H2A) housing. The County confirmed that working with the university, if the land is not annexed by the City of Brawley, is a great opportunity to provide affordable housing near educational and employment opportunities. Additionally, the County explained that there has been conversion of farm housing to employee housing but building permits have not shown a conversion, or loss of, family units for H2A housing.

There were two attendees at the April 28 meeting, though no public comment was made.

Noticing of the Draft Housing Element

The County released the Public Review Draft of the 2021-2029 Housing Element on July 8, 2021 for review and comment. The draft was available on the County's website and, in an effort to reach all segments of the community, direct noticing was sent to community meeting attendees and groups and individuals interested in the Housing Element update process. Public comment was encouraged throughout the duration of the 60-day review period of the Housing Element. The revised public review draft was posted to the County's website on December 13, 2 weeks prior to resubmittal to HCD. Direct noticing was sent to local agencies, neighborhood groups and individuals interested in the Housing Element update process.

Public Comment

County staff received public comment from the Naval Air Facility (NAF) El Centro on August 9, 2021. The NAF requested noise abatement be considered in the goals of the Housing Element to ensure compatibility between new residential development and NAF operation. The County incorporated this change into Goal 8 of the Housing Element. No additional public comment has been received on the Draft Housing Element but if comments are received, they will be reviewed and summarized in the housing element.

V. General Plan Consistency

According to State law, a jurisdiction's General Plan and its elements must be integrated, internally consistent, and a compatible statement of policies. The purpose of the Housing Element is to support and identify an adequate supply of housing affordable to lower-income households by providing guidance in the development of future plans, procedures, and programs, and by removing governmental constraints to housing production. The Housing Element has detailed goals, policies, and specific measures. Under State law, the entire General Plan is required to be "internally consistent," meaning that all elements of the General Plan have equal legal status and no policy within the General Plan can directly conflict with another.

Concurrently with this Housing Element update, the Seismic and Public Safety and Environmental Justice Elements, are being reviewed and updated to bring them into compliance with State law. The Land Use Element was reviewed as part of the Housing Element update to ensure consistency between land uses and zoning as well as other General Plan components. The concurrent process has ensured consistency between the Housing Element and other General Plan elements. The County will continue to review and revise the Housing Element, as necessary for consistency, when amendments are made to the General Plan. Additionally, in compliance with Senate Bill (SB) 244, the County is in the process of conducting an analysis of disadvantaged unincorporated communities, defined as a community in which the median household income is 80 percent or less than the statewide median household income. This effort will include coordination with the Colonias Master Plan.

Appendix A: Housing Needs Assessment

Data Sources

This chapter analyzes population, housing, employment opportunities, and income characteristics, identifies special housing needs, and evaluates the condition of the housing stock and other important information to support the goals, policies, and programs to meet the needs of the citizens of Imperial County. In preparing this chapter, various sources of information were used. The County relied on the United States (US) Census, American Community Survey (ACS), California Department of Finance (DOF), California Employment Development Department (EDD), and other available local sources.

The US Census, which is completed every 10 years, is an important source of information for the Housing Needs Assessment. It provides the most reliable and in-depth data for demographic characteristics of a locality. The ACS is conducted by the US Census Bureau and provides estimates of numerous housing-related indictors based on samples averaged over a five-year period. The Housing Needs Assessment reflects the 2015-2019 ACS data.

The DOF is another source of valuable data and is more current than the US Census. However, the DOF does not provide the depth of information that can be found in the US Census Bureau reports. The California Employment Development Department provides employee and industry data and projections that are more specific than what is often available through the US Census. Whenever possible, DOF or Employment Development Department data and other local sources were used in the Housing Needs Assessment to provide the most current profile of the community.

Wherever available, the County used data compiled by the Southern California Association of Governments (SCAG). The SCAG dataset primarily consisted of data from the US Census and various ACS datasets. Due to the wide margin of error in ACS data and the variety of sources used, there may be discrepancies between statistics in this analysis. Additionally, where unincorporated county data was not available, data from incorporated cities in the county were summed and subtracted from the overall county total to arrive at an unincorporated county estimate. For instances in which this method was not feasible or appropriate, countywide data is reported. Demographic information for townsites was extrapolated from Census-Designated Places (CDP) data and/or from city and total county data.

Because of the difference in data sources, some figures (e.g., population or the number of households) may vary in different sections. For example, DOF reports estimates for unincorporated Imperial County as the difference between totals for the whole county and the sum of incorporated areas, while ACS reports estimates that include only census-designated places in the unincorporated county. Additionally, the sum of data in tables may not total precisely due to rounding.

Unincorporated Townsites

Unincorporated Imperial County consists of 10 townsites: Bombay Beach, Desert Shores, Heber, Niland, Ocotillo/Nomirage, Palo Verde, Salton City/Vista Del Mar, Salton Sea Beach, Seeley, and Winterhaven. These townsites serve as the population centers, and future population growth will be directed to these areas. Table A-1 provides an overview of each townsite, including population, housing units, and location.

TABLE A-1
IMPERIAL COUNTY TOWNSITES

Townsite	Population	Existing Housing Units	Location
Bombay Beach	297	375	East shore of the Salton Sea, south of State Highway 111
Desert Shores	574	520	West shore of the Salton Sea, east of State Highway 86
Heber	3,604	1,097	Between Calexico and El Centro
Niland	631	315	North-central portion of the county, south of the Union Pacific Railroad
Ocotillo/ Nomirage	89	304	Southwestern portion of the county, just north of the United States/Mexico international boundary
Palo Verde	65	175	Northeastern portion of the county, along State Highway 78
Salton City/Vista Del Mar	6,250	2,928	West shore of the Salton Sea
Salton Sea Beach	261	179	Northwest portion of the county on State Highway 86
Seeley	2,010	669	Six miles west of El Centro
Winterhaven	192	215	Southeastern most portion of the county

Source: 2015-2019 ACS

Demographic and Employment Characteristics

Population Trends

According to the DOF, the total population of Imperial County was 188,777 in 2020, an increase of 8.2 percent since 2010. The population of the unincorporated county increased 4.3 percent over the same period, from 37,778 to 39,420.

According to the ACS, Salton City saw the greatest growth, surpassing Heber as the most populated townsite in the unincorporated county, with a population of 6,250 in 2019, a 346-percent increase from 1,400 in 2010. Salton City, Desert Shores, and Seeley were the only unincorporated townsites that experienced growth, all others saw decreases in population ranging from a 1-percent decrease (Bombay Beach) to a 78-percent decrease (Winterhaven). Refer to Table A-2 for population trends in the unincorporated county and Imperial County as a whole.

TABLE A-2
POPULATION TRENDS

Townsite	2010	2020	Change	
			Number	Percentage
Brawley	24,953	27,349	2,396	9.6%
Calexico	38,572	40,896	2,324	6.0%
Calipatria	7,705	6,843	-862	-11.2%
El Centro	42,598	45,657	3,059	7.2%
Holtville	5,939	6,359	420	7.1%
Imperial	14,758	19,907	5,149	34.9%
Westmorland	2,225	2,346	121	5.4%
Total Incorporated County	136,750	149,357	12,607	9.2%
Total Unincorporated County *	37,778	39,420	1,642	4.3%
Total County	174,528	188,777	14,249	8.2%

Source: California DOF, City/County Population and Housing Estimates

** Includes all unincorporated areas, beyond just census-designated places.*

Age Characteristics

Current and future housing needs are determined, in part, by the age characteristics of residents. For many, housing needs change based on stage of life. Young professionals, growing families, seniors, and residents with a wide variety of other lifestyles have unique housing preferences and financial situations.

Persons aged 25 to 44 are considered to be in the family-forming age group. According to the 2015-2019 ACS data, this age group represents 24.8 percent of the population in the unincorporated county. Residents aged 65 and older are considered to be of retirement age and account for 18.1 percent of the population in the unincorporated county. The retirement age group makes up a slightly smaller portion of the population than the family-forming age group. This could suggest that Imperial County has more appeal to the working-age population than to persons of retirement age. Refer to Table A-3 for a breakdown of the population by age group for the unincorporated county and for Imperial County as a whole.

TABLE A-3
AGE CHARACTERISTICS, 2019

Age Group	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
< 5 years	1,179	8.7%	15,080	8.3%
5 to 14 years	1,585	11.7%	28,395	15.7%
15 to 24 years	2,114	15.6%	27,101	15.0%
25 to 34 years	1,683	12.4%	26,562	14.7%
35 to 44 years	1,683	12.4%	22,086	12.2%
45 to 54 years	1,288	9.5%	20,156	11.2%
55 to 64 years	1,580	11.6%	18,480	10.2%
65 to 74 years	1,422	10.5%	12,818	7.1%
75 to 84 years	865	6.4%	7,022	3.9%
85+ years	174	1.3%	3,001	1.7%
Total	13,573	100.0%	180,701	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Race and Ethnicity

According to the 2015-2019 ACS, white residents represented the largest race group in the unincorporated county and Imperial County as a whole, accounting for 70.9 percent and 65.1 percent of residents, respectively. Persons of Hispanic origin, who may identify with any race, made up a significant portion of the population. Approximately 76.2 percent of residents were of Hispanic origin in the unincorporated county and 84.2 percent of the countywide population was Hispanic. Refer to Table A-4 for detailed figures on race and ethnicity in the unincorporated county and in Imperial County as a whole.

TABLE A-4
POPULATION BY RACE, 2019

Race/Ethnicity	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
White alone	9,906	70.9%	117,658	65.1%
Black of African American alone	296	2.1%	4,489	2.5%
American Indian and Alaska Native alone	182	1.3%	1,912	1.1%
Asian alone	81	0.6%	2,680	1.5%
Native Hawaiian and Other Pacific Islander alone	24	0.2%	309	0.2%
Some other race alone	3,189	22.8%	47,139	26.1%
Two or more races	295	2.1%	6,514	3.6%
Total	13,973	100.0%	180,701	100.0%
Hispanic or Latino	10,646	76.2%	152,172	84.2%
Not Hispanic or Latino	3,327	23.8%	28,529	15.8%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Household Characteristics

A household is defined as any group of people living together in a residence, whether related or unrelated. Household size and composition information can indicate the type of housing that may be appropriate for county residents. According to the DOF, there were 35,331 households in the unincorporated county in 2020, an increase of approximately 9.1 percent since 2010. The household population increased by approximately 10.1 percent for the county as a whole for the same period.

Table A-5 shows household growth trends in the unincorporated county and in Imperial County as a whole from 2010 to 2020.

TABLE A-5
HOUSEHOLD GROWTH TRENDS, 2010-2020

Area	2010	2020	Change	
			Number	Percentage
Unincorporated County *	32,379	35,331	2,952	9.1%
Total County	163,844	180,378	16,534	10.1%

Source: California DOF, City/County Population and Housing Estimates

** Includes all unincorporated areas, beyond just census-designated places.*

Household Size

According to the 2015-2019 ACS, the average household in Imperial County was 3.81 persons (countywide) as of 2019. Approximately 63.4 percent of households in the unincorporated county were one- or two-person households, 16.1 percent were three-person, and 20.4 percent were households with four or more persons. Owner-occupied households had a higher percentage of smaller, one- or two-person households.

In the county as a whole, approximately 46.6 percent of households were one- or two-person, 17.5 percent were three-person, and 36.0 percent were households with four or more persons. Refer to Table A-6 for household size by tenure in the unincorporated county and in Imperial County as a whole.

TABLE A-6
HOUSEHOLD SIZE BY TENURE

Household Size	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
Owner-occupied	3,155	68.5%	26,156	58.3%
1-person	1,285	40.7%	5,022	19.2%
2-person	1,008	31.9%	7,579	29.0%
3-person	382	12.1%	4,382	16.8%
4-or-more person	480	15.2%	9,173	35.1%
Renter-occupied	1,452	31.5%	18,673	41.7%
1-person	339	23.3%	4,213	22.6%
2-person	290	20.0%	4,054	21.7%
3-person	362	25.0%	3,465	18.6%
4-or-more person	461	31.7%	6,941	37.2%
Total Households	4,607	100.0%	44,829	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Income Characteristics

The California Department of Housing and Community Development (HCD) publishes annual income limits for each county that are used to determine eligibility for assisted housing programs. Income levels are described in the following categories:

- Extremely low-income: Earns up to 30 percent of the area median income (AMI)
- Very low-income: Earns between 31 and 50 percent of the AMI

- Low-income: Earns between 51 and 80 percent of the AMI
- Moderate-income: Earns between 81 and 120 percent of the AMI
- Above-moderate-income: Earns more than 120 percent of the AMI

Limits for each income category are based on a percentage of the county's median income. For Imperial County, the median income for a household of four was $70,700 in 2020. The income limits by household size for 2020 are provided in Table A-7.

TABLE A-7
IMPERIAL COUNTY INCOME LIMITS, 2020

Income Category	Number of Persons in Household							
	1	2	3	4	5	6	7	8
Extremely Low	$14,700	$17,240	$21,720	$26,200	$30,680	$35,160	$39,640	$44,120
Very Low	$24,500	$28,000	$31,500	$34,950	$37,750	$40,550	$43,350	$46,150
Low	$39,150	$44,750	$50,350	$55,900	$60,400	$64,850	$69,350	$73,800
Median	$49,500	$56,550	$63,650	$70,700	$76,350	$82,000	$87,650	$93,300
Moderate	$59,400	$67,900	$76,350	$84,850	$91,650	$98,450	$105,200	$112,000

Source: HCD 2020 State Income Limits

Table A-8 provides a summary of households in the unincorporated county and county as a whole according to the 2015-2019 ACS. Approximately 75.1 percent of households in the unincorporated county were considered lower income, earning less than 80 percent of the AMI.

TABLE A-8
HOUSEHOLDS BY INCOME CATEGORY (4-PERSON HOUSEHOLDS)

Income Category	Unincorporated County		Total County*	
	Estimate**	Percentage	Estimate**	Percentage
Extremely Low	1,969	41.5%	13,882	31.0%
Very Low	649	13.7%	3,805	8.5%
Low	941	19.9%	7,443	16.6%
Moderate	628	13.2%	7,428	16.6%
Above Moderate	553	11.7%	12,271	27.4%
Total Households	4,740	100.0%	44,829	100.0%

Source: 2015-2019 ACS; HCD 2020 State Income Limits
**Total County includes both incorporated and unincorporated communities.*
***The income breaks reported by the ACS vary slightly from the income category breaks determined by HCD; therefore, the numbers reported here are estimates based on the comparison of these data sources. The actual number of units in each income category, and the total, may therefore vary slightly.*

Employment

According to 2015-2019 ACS estimates, there were 4,958 jobs in the unincorporated area of Imperial County in 2019. The largest industries of employment were education, health, and social services (922 employees); arts, entertainment, recreation, and accommodation and food services (790 employees); and agriculture, forestry, fishing and hunting, and mining (711 employees). Refer to Table A-9 for the number of jobs by industry type in the unincorporated county.

TABLE A-9
EMPLOYMENT BY INDUSTRY, UNINCORPORATED COUNTY

Area	Number	Percentage
Agriculture, forestry, fishing and hunting, and mining	711	14.3%
Construction	412	8.3%
Manufacturing	298	6.0%
Wholesale trade	65	1.3%
Retail trade	532	10.7%
Transportation and warehousing, and utilities	319	6.4%
Information	46	0.9%
Finance and insurance, and real estate and rental and leasing	143	2.9%
Professional, scientific, and management, and administrative and waste management services	294	5.9%
Educational services, and health care and social assistance	922	18.6%
Arts, entertainment, and recreation, and accommodation and food services	790	15.9%
Other services, except public administration	211	4.3%
Public administration	215	4.3%
Total	4,958	100.0%

Source: 2015-2019 ACS

Table A-10 shows California's Employment Development Department employment projections from 2016 through 2026 as related to growth in absolute number of jobs in the El Centro Metropolitan Statistical Area (MSA). During the next five years, the El Centro MSA expects the greatest growth in employment in private educational services, healthcare, and social assistance.

TABLE A-10
EMPLOYMENT PROJECTIONS, EL CENTRO MSA

Occupation Group	Employment Estimate		Change	
	2018	2028*	Number	Percentage
Total Farm	11,400	10,400	-1,000	-8.8%
Mining, Lodging, and Construction	1,800	2,000	200	11.1%
Manufacturing	1,400	1,700	300	21.4%
Trade, Transportation, and Utilities	12,300	13,200	900	7.3%
Information	300	300	0	0.0%
Financial Activities	1,300	1,300	0	0.0%
Professional and Business Services	2,600	2,900	300	11.5%
Educational Services (Private), Healthcare, and Social Assistance	8,400	11,200	2,800	33.3%
Leisure and Hospitality	4,300	5,200	900	20.9%
Other Services	900	1,000	100	11.1%
Government	18,900	21,000	2,100	11.1%

Source: California Employment Development Department 2018-2028 Industry Sector Employment Projections
**Projected*

Special Needs Groups

This section identifies special needs households in Imperial County. This assessment is essential because a major part of the County's role in providing opportunities for affordable housing is to preclude barriers to residents whose needs are not normally met by the private sector. This segment of the county's population is constrained by the housing market not only because of lower incomes but also because of the lack of housing that is suitable to their special needs.

Extremely Low-Income Households

Extremely low-income households are those earning 30 percent or less of the AMI. In 2020, the upper limit of this income category was $26,200 for a family of four in Imperial County. Those with the lowest incomes may experience the greatest challenges in finding suitable, affordable housing. Extremely low-income households often have a combination of housing challenges related to income, credit status, disability or mobility status, family size, household characteristics, supportive service needs, or a lack of affordable housing opportunities. These households typically include seniors on Social Security, individuals with disabilities, single parents, farmworkers, and low-wage workers. Some extremely low-income individuals and households are homeless.

Many extremely low-income households seek rental housing and most likely face overpayment, overcrowding, or substandard housing condition. Some extremely low-income households could have members with mental or other disabilities and special needs.

According to the 2015-2019 ACS, approximately 41.5 percent of households (or 1,969 households) in unincorporated Imperial County were extremely low-income (Table A-8). Of these households, approximately 66 percent were homeowners. The County relied on ACS data rather than the United States Department of Housing and Urban Development's (HUD's) Comprehensive Housing Affordability Strategy (CHAS) to determine the number of extremely low-income households as CHAS data estimates this number of the whole of Imperial County while estimates for unincorporated Imperial County are available through ACS.

The County has included Programs 5, 10, 11,14, 18, and 22 to provide the following that could assist extremely low-income households:

- Support the Imperial Valley Housing Authority with acquiring and rehabilitating existing multifamily units to be converted to affordable housing, affordable to extremely low-, very low-, and low-income households.
- Provide regulatory incentives such as permitting reduced lot sizes, reduced site setbacks, and off-street parking to lessen land costs for housing development to incentivize construction of housing affordable to extremely low-income households. The County will take subsequent action, as appropriate, to make the development of such units more financially feasible, including supporting the use of federal and state funding resources for local housing needs and programs and providing financial incentives, such as reducing, waiving, and/or deferring fees, where feasible, offering fast-track/priority processing, and density bonuses.
- Seek funding to rehabilitate existing farmworker housing and construct new units.
- Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services offices and on the County's website.
- Collaborate with the Imperial Valley Continuum of Care and other nonprofit organizations that provide emergency shelter and other support services to promote community-wide planning and strategic use of resources to address homelessness.
- Encourage the development of housing for extremely low-income households through a variety of activities, such as outreach to housing developers on an annual basis, providing financial assistance (when feasible) or in-kind technical assistance or land write-downs, providing expedited processing, identifying grant and funding opportunities, applying for or supporting applications for funding on an ongoing basis, reviewing and prioritizing local funding at least twice in the planning period, and/or offering additional incentives beyond the density bonus.

- Continue to operate housing rehabilitation and weatherization programs that assist lower-income households occupying housing in need of repair.

Senior Households

Many seniors live on a low, fixed income and have physical disabilities and dependence needs that make it difficult for them to find suitable affordable housing. There are heavy concentrations of senior households in the outlying desert "retirement" communities in the unincorporated county. According to the 2015-2019 ACS, 18.1 percent of the population, or 2,461 persons, in the unincorporated county were 65 years and older, as of 2019 (see Table A-3).

As shown in Table A-11, there were 1,428 senior householders in the unincorporated county as of 2019. Among these householders, approximately 84.7 percent resided in owner-occupied units.

TABLE A-11
SENIOR HOUSEHOLDS BY TENURE, UNINCORPORATED COUNTY

Age	Number	Percentage of Households
Total Owner-Occupied	3,211	68.6%
Owners aged 65 to 74 years	712	22.2%
Owners aged 75 to 84 years	431	13.4%
Owners aged 85 years and over	66	2.1%
Total Senior Owners	1,209	37.7%
Total Renter-Occupied	1,469	31.4%
Renters aged 65 to 74 years	143	9.7%
Renters aged 75 to 84 years	58	3.9%
Renters aged 85 years and over	18	1.2%
Total Senior Renters	219	14.9%
Total Occupied Households	4,680	100.0%
Householder aged 65 to 74 years	855	18.3%
Householder aged 75 to 84 years	489	10.4%
Householder aged 85 years and over	84	1.8%
Total Senior Householder	1,428	30.5%

Source: 2015-2019 ACS

Table A-12 lists care facilities for seniors and disabled persons in Imperial County along with the capacity of each facility.

TABLE A-12
CARE FACILITIES FOR SENIORS AND/OR DISABLED PERSONS

Facility Name	Address	Total Capacity (persons)
Imperial Manor	100 East 2nd Street, Imperial	31
Royal Convalescent Home	320 Cattle Call Drive, Brawley	99
A&A Cottage View Assisted Living, Inc.	103 S Haskell Drive, El Centro	14
Blossom Valley Inn	708 East 5th Street, Holtville	175
Casa Elite	1785 Citrus Lane, El Centro	8
Heart & Hand, Inc.	499 South Sunset Drive, El Centro	14
Parkside Villa Assisted Living	1685 Cypress Drive, El Centro	15
Vintage Village 2	1203 Driftwood, El Centro	6
Vintage Village Assisted Living	921 Ocotillo, El Centro	6
Baird Board and Care #1	1937 Mount Signal Avenue, Seeley	4
Mazeroll Residential Services	286 W. Cancun Road, Imperial	6
Serenity Home	804 Kemp Court, Calexico	6
Smoketree	1663 Smoketree Drive, El Centro	6
Sunset Home	1878 South Second Street, El Centro	6
Tender Loving Care Home	151 West "K" Street, Brawley	6
Tender Loving Care II	286 W. Duarte Street, Brawley	4
Villa Nayarit	412 S. C Street, Imperial	4

Source: California Department of Social Services 2021; hospital-data.com 2021; seniorcarehomes.com 2021

Persons with Disabilities

Persons with disabilities have special housing needs because of employment and income challenges; need for accessible, affordable, and appropriate housing; and higher healthcare costs associated with a disability. A disability is defined by the US Census Bureau as a physical, mental, or emotional condition that lasts over a long period of time and makes it difficult to live independently.

Living arrangements of disabled persons depend on severity of disability. Many disabled persons live in their own home, in an independent situation, or with other family members. The US Census collects data for several categories of disability. The ACS defines six aspects of disability: hearing, vision, cognitive, ambulatory, self-care, and independent living.

- Hearing difficulty: Deafness or serious difficulty hearing
- Vision difficulty: Blindness or serious difficulty seeing even when wearing glasses

- Cognitive difficulty: Serious difficulty concentrating, remembering, or making decisions due to a physical, mental, or emotional condition
- Ambulatory difficulty: Serious difficulty walking or climbing stairs
- Self-care difficulty: Difficulty dressing or bathing (Activities of Daily Living [ADL])
- Independent living difficulty: difficulty doing errands alone, such as visiting a doctor's office or shopping due to a physical, mental, or emotional condition

As shown in Table A-13, approximately 15.1 percent of the unincorporated Imperial County population and 14.4 percent of the county as a whole had some type of disability, according to ACS estimates.

TABLE A-13
PERSONS WITH DISABILITY

Type of Disability	Age Group			With a Disability	Total Population	Percentage with a Disability
	Under 18 Years	18-64 Years	65+ Years			
Unincorporated Imperial County						
Hearing Difficulty	0	143	301	444	13,939	15.1%
Vision Difficulty	22	112	137	271		
Cognitive Difficulty	56	460	204	720		
Ambulatory Difficulty	0	499	611	1,110		
Self-Care Difficulty	0	118	198	316		
Independent Living Difficulty	--*	313	402	715		
Total Imperial County						
Hearing Difficulty	224	1,728	3,498	5,450	170,981	14.4%
Vision Difficulty	522	1,698	2,016	4,236		
Cognitive Difficulty	1,672	4,910	3,299	9,881		
Ambulatory Difficulty	192	5,770	7,545	13,507		
Self-Care Difficulty	427	2,603	3,438	6,468		
Independent Living Difficulty	--*	4,465	5,381	9,846		

Source: 2015-2019 ACS

Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, "developmental disability" means a disability that originates before an individual reaches 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. It includes intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with intellectual disabilities but does not include other conditions that are solely physical in nature.

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

The California Department of Developmental Services (DDS) provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, 4 developmental centers, and 2 community-based facilities. The San Diego Regional Center is one of 21 regional centers in California that provides point of entry to services for people with developmental disabilities. The San Diego Regional Center has a field office in the City of Imperial, which provides services to all of Imperial County. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

According to the DDS, using data compiled from the San Diego Regional Center, in September 2020, the Imperial County field office served approximately 620 developmentally disabled residents in the unincorporated County. Refer to Table A-14 for an estimate of the number of developmentally disabled residents by age in Imperial County.

TABLE A-14

IMPERIAL COUNTY DEVELOPMENTALLY DISABLED RESIDENTS

ZIP Code	0-17 Years	18+ Years	Total
92222 (Bard)	<11	0	>0
92227 (Brawley)	314	150	464
92231 (Calexico)	394	224	618
92233 (Calipatria)	51	20	71
92243 (El Centro)	530	343	873
92249 (Heber)	100	40	140
92250 (Holtville)	46	39	85
92251 (Imperial)	248	117	365

ZIP Code	0-17 Years	18+ Years	Total
92257 (Niland/Bombay Beach)	248	117	365
92259 (Ocotillo)	<11	0	>0
92266 (Palo Verde)	-	-	-
92275 (Salton City)	<11	<11	>0
92273 (Seeley)	27	17	44
92281 (Westmorland)	33	<11	>33
92283 (Winterhaven)	16	<11	>16
Total, All Incorporated Cities	1,616	<904	<2,520
Total, Unincorporated Area of County	<424	<196	<620
Total, County	<2,040	<1,100	<3,140

Source: California DDS, Consumer County by California Zip Code and Age Group
Note: These represent available estimates and the "<" denotes potential for error.

There are a number of housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, low-income housing, Section 8 vouchers, special programs for home purchase, HUD housing, and Senate Bill (SB) 962 homes. The design of housing-accessibility modifications, proximity to services and transit, and availability of group living opportunities represent the types of considerations important in serving this need group. Incorporating 'barrier-free' design in all new multifamily housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to affordability of housing, as people with disabilities may be living on a fixed income. The County has included Program 17 to coordinate with service providers for individuals with developmental disabilities and ensure there is adequate supportive housing to meet residents' needs.

Large Households

HUD defines a large-family household as one with five or more members. Large-family households require housing units with more bedrooms than housing units needed by smaller households. In general, housing for these households should also provide safe outdoor play areas for children and be located to provide convenient access to schools and childcare facilities. These types of needs can pose problems, particularly for large families that cannot afford to buy or rent single-family houses, as apartment and condominium units are most often developed with childless, smaller households in mind.

According to the 2014-2018 ACS, approximately 13.6 percent of households (1,289 households) in the unincorporated county contained five or more persons. Of these households, 68.7 percent (886 households) were owners and 31.3 percent (403 households) were renters. Data on household size was not reported as part of the 2015-2019 ACS; therefore, the County relied on the 2014-2018 ACS data to estimate the number of large households in unincorporated areas.

According to the 2014-2018 ACS, 61.2 percent of the total housing units in the unincorporated county had three or more bedrooms (4,148 units), while just 1.7 of all housing units have five or more bedrooms (114 units) to accommodate large households without any overcrowding.

Single-Parent and Female-Headed Households

Single-parent households are male- or female-headed households with children under the age of 18 living at home. Single-parent households often have lower incomes than two-parent households and may have special needs relating to childcare, healthcare, and housing. Female-headed households tend to have lower incomes, which limits opportunities to find housing of an adequate size at an affordable price.

According to the 2015-2019 ACS, approximately 8.4 percent, or 388, of County households were single-parent households with a male householder and approximately 12.8 percent, or 590, were single-parent households with a female householder. Refer to Table A-15 for data regarding single-parent and female-headed households in unincorporated Imperial County.

TABLE A-15
SINGLE-PARENT AND FEMALE-HEADED HOUSEHOLDS, UNINCORPORATED COUNTY

Householder	Number	Percentage of Total Households
Male householder, no spouse present	388	8.4%
With own children under 18 years	162	3.5%
Female householder, no spouse present	590	12.8%
With children under 18 years	187	4.1%
Total Single-Parent Households	1,327	100.0%
Total Households (all)	4,607	

Source: 2015-2019 ACS

Note: Includes only census-designated places in unincorporated Imperial County.

Native Americans

There are two federally recognized tribal reservations in Imperial County – the Quechan Tribe and the Torres-Martinez Desert Cahuilla Indians. According to the US Bureau of Reclamation, there were 3,870 members of the Quechan Tribe, of whom, 2,022 resided on or adjacent to the reservation in Imperial County in 2018. Based on the 2010 Census, SCAG estimates the Torres-Martinez Desert Cahuilla Indian population consists of approximately 5,594 residents. The Torres-Martinez tribal population resides in Riverside and Imperial Counties.

Native American populations may have special needs due to lower incomes and a lack of access to resources. The Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program provides temporary assistance to Native American families with children. The program offers housing-related assistance, as well as social services, including childcare assistance and employment training. Housing

assistance is provided through temporary cash for housing and utilities or emergency shelter expenses. The local TANF office is located in Thermal (66725 Martinez Road).

Farmworkers

Imperial County is located in one of the most productive agricultural regions in the United States. While agriculture is a year-round activity in the county, agricultural activity peaks between November and February and reaches the lowest ebb during the months of July, August, and September. According to SCAG, which calculated unincorporated farming jobs from the 2014-2018 ACS 5-Year Estimates, approximately 945 residents were identified as having a farming occupation. According to the 2017 U.S. Department of Agriculture (USDA) Census of Agriculture, there were 7,934 hired farm workers in Imperial County, including both incorporated and unincorporated areas (see Table A-15A). Of those farm workers, the majority (4,634 persons) were permanent employees, working more than 150 days per year. The remaining farmworkers (3,714 persons) were seasonal employees, and 1,057 of farmworkers were migrant.

TABLE A-15A
FARM WORKERS, 2017

	Imperial County
Hired Farm Workers	7,934
Permanent Employees (more than 150 days)	4,634
Seasonal Employees (less than 150 days)	3,330
Migrant Workers	1,057

Source: USDA 2017 Census of Agriculture

Many farmworkers earn relatively low wages. According to the California Economic Development Department's occupational profile, agricultural workers in Imperial County earned an average hourly wage of $14.14 as of the first quarter of 2020. The majority of the farmworkers in the county are of Hispanic descent. Many are migrant, generally residing in the county for four to six months out of the year and moving to other areas for the remainder of the year. This creates a fluctuating demand for rental units, with the highest demand occurring during the winter and spring months.

Imperial County's proximity to Mexicali, Mexico, where a large portion of the farm labor pool resides, affords many farm laborers the ability to continue to live in Mexicali where rents are less than in Imperial County. These farm laborers commute on a daily basis via personal vehicle, carpool, public transportation, or employer-supplied busing, which reduces the overall seasonal housing need usually associated with this type of workforce.

The Imperial Valley Housing Authority (IVHA) operates four farmworker housing complexes. Two are located in the City of El Centro, one with 40 units and the other with 36 units. Complexes are also located in the City of Brawley with 58 units and in Heber with 40 units. These farmworker complexes are regulated by the United States Department of Agriculture's (USDA) Rural Development.

Homeless Persons

Homeless individuals and families have an urgent need for housing resources and services; however, their needs are difficult to meet because of the range and complexity of the factors that lead to homelessness. According to the 2020 Point-in-Time Count conducted by the Imperial County Department of Social Services, there were 1,052 homeless persons in the unincorporated communities of Imperial County. Of these residents, 885 reside in Slab City, a transient community that resides primarily in travel trailers, tents, and other similar structures. The largest homeless population census-designated places in unincorporated Imperial County is located in Salton City, with 62 persons.

Services for homeless families and individuals are available mainly in the incorporated cities in Imperial County. Table A-16 lists homeless assistance programs and service providers in the county.

TABLE A-16
SHELTERS IN IMPERIAL COUNTY

Shelter Name	Type of Shelter	City	Needs Serviced
Center for Family Solutions	Emergency and Transitional	El Centro	Victims of Domestic Violence
Our Lady of Guadalupe Men's Shelter	Transitional	Calexico	Men
House of Hope	Emergency	El Centro	Women and Children
Neighborhood House Casa Villanueva	Emergency	Calexico	Women and Children
Neighborhood House Transitional Housing	Transitional	Calexico	Women and Children
New Creations Transitional Home	Transitional	Imperial	General
Turning Point Men's Home	Transitional	Holtville	Substance Abuse

Source: imperial.networkofcare.org 2021

Housing Characteristics

Unit Type

As of 2019, there were a total of 6,777 housing units in the unincorporated county. Of these, 70.0 percent were detached single-family homes. Mobile homes accounted for 22.6 percent of the housing stock. In Imperial County as a whole, detached single-family homes accounted for 64.5 percent and mobile homes

accounted for 10.2 percent of the 57,690 total units. Refer to Table A-17 for information regarding housing units by type in the unincorporated county and in Imperial County as a whole.

The composition of the housing stock varied greatly among townsites in the unincorporated county. In Heber, Salton City, Seeley, and Winterhaven, most housing units were detached single-family dwellings, whereas in Bombay Beach, Desert Shores, Palo Verde, and Salton Sea Beach, most housing units were mobile homes.

TABLE A-17
HOUSING UNIT TYPE

Housing Unit Type	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
Single-Family, Detached	4,742	70.0%	37,202	64.5%
Single-Family, Attached	40	0.6%	1,087	1.9%
2 units	28	0.4%	1,709	3.0%
3-4 units	196	2.9%	3,755	6.5%
5+ units	207	3.1%	7,823	13.6%
Mobile homes	1,533	22.6%	5,908	10.2%
Other (Boat, RV, etc.)	31	0.5%	206	0.4%
Total Housing Units	6,777	100.0%	57,690	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Tenure and Vacancy

Housing tenure refers to the occupancy of a housing unit—whether the unit is owner-occupied or renter-occupied. Housing tenure is influenced by demographic factors such as household composition, income, and age, as well as the cost of housing. According to the 2015-2019 ACS, approximately 68.0 percent of occupied housing units were owner-occupied in unincorporated Imperial County in 2019. This ownership rate is higher than that of the county as a whole, where 38.9 percent of occupied units were owner-occupied. Refer to Table A-18 for occupancy figures for the unincorporated county and for Imperial County as a whole.

Vacancy rates are an indicator of housing supply and demand. If housing demand is greater than the supply, the vacancy rate is likely to be low and the price of housing increases. A 5- to 6-percent vacancy rate is generally considered healthy. According to the 2015-2019 ACS, there was a vacancy rate of approximately 32.0 percent in the unincorporated county and 11.1 percent in the county as a whole. However, 38.4 percent of the vacant units in the unincorporated county were used for seasonal or recreational use while there is a 1.1 percent vacancy rate for rental units and 1.2 percent vacancy rate for for-sale homes. This suggests that

the available supply of housing is well below demand. Refer to Table A-18 for vacancy information for the unincorporated county and for Imperial County as a whole.

TABLE A-18
TENURE AND VACANCY

Tenure and Vacancy Status	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
Occupied Housing Units	4,607	68.0%	44,829	38.9%
Owner-occupied	3,155	46.6%	26,156	22.7%
Renter-occupied	1,452	21.4%	18,673	16.2%
Vacant Housing Units	2,170	32.0%	12,861	11.1%
For rent	74	1.1%	764	0.7%
For sale	78	1.2%	397	0.3%
Rented or sold, not occupied	94	1.4%	342	0.3%
For seasonal, recreational, or occasional use	833	12.3%	2,603	2.3%
For migrant workers	20	0.3%	56	0.0%
Other	1,071	15.8%	8,699	7.5%
Total Housing Units	6,777	100.0%	57,690	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Housing Conditions

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to need major repairs (e.g., a new roof or plumbing). As a general rule of thumb, houses 30 years or older are more likely to need rehabilitation. In addition, older houses may not be built to current standards for fire and earthquake safety.

Table A-19 shows that approximately 35 percent of the housing stock in unincorporated areas is relatively new, 20 years old or less. According to the 2015-2019 ACS, approximately 46 percent of the housing stock in unincorporated Imperial County was built before 1990 (30 years or older). Based on this, it is safe to assume that a majority of these units need some type of rehabilitation.

It should also be noted that nearly 23 percent of all housing units in the unincorporated county are mobile homes (see Table A-17). Experience has shown that these structures age much more rapidly than those of traditional construction; therefore, assumptions regarding housing conditions based solely on age may not be valid for manufactured homes.

According to Imperial County Code Enforcement, at the time of this Housing Element update, there are approximately 153 active condemnation cases and 30 active repair orders. County staff estimates that approximately 10 to 15 condemnation and repair orders, combined, are received per month, and that approximately 10 percent of the County's housing stock is in need of repair or rehabilitation.

TABLE A-19
AGE OF HOUSING STOCK

Development	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
2014 or later	20	0.3%	2,755	4.7%
2010 to 2013	10	0.1%	1,489	2.6%
2000 to 2009	2,335	34.6%	10,686	18.3%
1990 to 1999	1,285	19.1%	10,931	18.8%
1980 to 1989	1,167	17.3%	8,365	14.4%
1970 to 1979	650	9.6%	9,741	16.7%
1960 to 1969	697	10.3%	5,065	8.7%
1950 to 1959	373	5.5%	6,068	10.4%
1940 to 1949	109	1.6%	1,750	3.0%
1939 or earlier	95	1.4%	1,435	2.5%
Total	6,741	100.0%	58,285	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Overcrowding

Overcrowding occurs when there is more than one person per room (excluding bathrooms and kitchens). Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration. Overcrowding most often occurs when housing costs are high relative to income, forcing more than one family to share a single unit or reside in a smaller unit.

According to the ACS, approximately 7.2 percent of households were living in overcrowded conditions in the unincorporated county as of 2019. Among these overcrowded households, approximately 79.0 percent were renters. The occurrence of overcrowding in the unincorporated county is similar to that in the county as a whole, where approximately 10.7 percent of households were living in overcrowded conditions as of 2019. Refer to Table A-20 for data regarding overcrowding in the unincorporated county and in the county as a whole.

TABLE A-20
OVERCROWDED HOUSEHOLDS

Persons per Room	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
Owner-Occupied	3,155	68.5%	26,156	58.3%
1.00 or less	3,085	97.8%	24,433	93.4%
1.01 to 1.50	42	1.3%	1,067	4.1%
1.51 or more	28	0.9%	656	2.5%
Renter-Occupied	1,452	31.5%	18,673	41.7%
1.00 or less	1,189	81.9%	15,621	83.7%
1.01 to 1.50	164	11.3%	2,237	12.0%
1.51 or more	99	6.8%	815	4.4%
Total Occupied Housing Units	4,607	100.0%	44,829	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Housing Costs and Affordability

Table A-21 lists 2020 affordable rental and home sale prices for Imperial County within HCD-established income categories (Table A-7), based on a four-person household. Extremely low-income households had annual incomes of $26,200 and could afford monthly rents of $655, or to purchase a home priced at approximately $163,536. A very low-income household with an annual income of $34,950 could afford a monthly rent of $874, or to purchase a home priced at approximately $218,152. A low-income four-person household with an annual income of $55,900 could afford a monthly rent of $1,398, or to purchase a home priced at $348,918. A moderate-income household with an annual income of $84,850 could afford a monthly rent of $2,121 or a home purchase price of $529,619.

TABLE A-21
AFFORDABLE HOUSING COSTS BY INCOME CATEGORY

	Income Level (Based on a 4-Person Household)			
	Extremely Low	Very Low	Low	Moderate
Annual Income	$26,200	$34,950	$55,900	$84,850
Monthly Income	$2,183	$2,913	$4,658	$7,071
Maximum Monthly Gross Rent[1]	$655	$874	$1,398	$2,121
Maximum Purchase Price[2]	$163,536	$218,152	$348,918	$529,619

Source: HCD 2020 State Income Limits

1. Affordable cost 30 percent of gross household income spent on housing.

2. Affordable housing sales price is based on conventional 30-year loan at 3-percent interest and a 5% down payment.

Home Prices

Median housing prices in the unincorporated area vary considerably from townsite to townsite. Prices for homes in the areas near the larger incorporated cities are generally higher than are those for the smaller, outlying unincorporated areas. Table A-22 depicts average home listing and sale prices in January 2021 for Census-designated places in unincorporated communities in the County. The median single-family home prices in the unincorporated areas ranged from a low of $45,900 in Salton City to a high of $309,900 in Heber.

TABLE A-22
MEDIAN HOME SALES PRICES, 2021

Community	Median Listing Price
Bombay Beach	-
Desert Shores	$59,000
Heber	$309,900
Niland	$52,000
Ocotillo	-
Palo Verde	$129,000
Salton City	$45,900
Salton Sea Beach	$65,000
Seeley	$105,000
Winterhaven	$140,000

Source: Realtor.com, January 2021

Note: Not enough homes were listed for sale in Bombay Beach or Ocotillo to calculate a median listing price.

Assuming that the potential homebuyer within each income group has sufficient credit, down payment (5 percent), and maintains affordable housing expenses (i.e., spends no more than 30 percent of their income on mortgage, taxes, and insurance), the maximum affordable home prices can be determined. Table A-22 demonstrates the purchasing power of the income groups defined above.

Given the median single-family home price in the unincorporated county, homeownership is beyond the reach of most extremely low-income, and some very low-income, households. Low-income households may be able to afford to buy attached or prefabricated units such as townhomes, condominiums, and manufactured homes.

Manufactured Homes

According to Homes Direct, a provider of new manufactured and modular homes in the western states, including the Imperial County region, new manufactured housing in April 2020, the most recent available data, ranged from $64,500 to $120,300, on average. There would be an additional cost of preparing the land. Most manufactured housing developed in the county serves cost-constrained families, providing an affordable alternative to traditional stick-built development. Table A-21 shows that a four-person, extremely low-income household can afford a maximum sales price of $163,536, a very low-income household can afford a maximum sales price of $218,152, and a low-income household can afford a maximum sales price of $348,918, meaning that manufactured housing is affordable to extremely low- to low-income households.

Rental Housing Costs

The maximum amount a household can spend on rent depends primarily on the level of household income. Table A-21 shows the approximate affordable rent based on income category for 2020. Maximum rent is based on a housing cost of 30 percent or less of monthly income. Maximum rents for households in Imperial County range from $655 per month for extremely low-income households to $2,121 for moderate-income households. The price of rental units in Imperial County varies from area to area depending on the neighborhood, style, and maintenance of the unit. Rental costs were generally found to be higher in the incorporated cities and lower in the outlying rural and desert areas. In February 2021, the County conducted a survey of rental housing websites to identify the median price of rental units by the size of the unit in unincorporated areas of the County. However, only six housing units were available to rent during the survey period, confirming the low-vacancy rate in unincorporated areas. Therefore, the median rents identified through this process may not reflect prices overall. The survey identified that the median monthly rent for a two-bedroom unit in the unincorporated county was $1,011. Based on the income limits shown in Table A-21, this would be affordable to low- and moderate-income households. Refer to Table A-23 for median rental rates in the unincorporated county.

TABLE A-23
MEDIAN MONTHLY RENT, UNINCORPORATED IMPERIAL COUNTY

Unit Size	Median Market Rent
1-bedroom	$375
2-bedroom	$1,778
3-bedroom	$1,011
4-bedroom	$1,350

Source: Zillow.com 2021; Realtor.com 2021; Trulia.com 2021; Craigslist.com 2021

Overpayment

Cost burden is the fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. A household with a cost burden greater than 30 percent of household income is considered to be overpaying for housing. Overpaying households may have to sacrifice other necessities or live in overcrowded conditions.

According to the 2013-2017 CHAS, 9,570 renter households and 6,815 homeowner households were overpaying for housing in the whole of Imperial County (Table A-24); data is not reported for just unincorporated areas of the County. Among both owner and renter households, overpayment was particularly problematic for lower-income households. The largest number of overpaying renters were those with extremely low incomes (4,525 households). Similarly, 61.5 percent of owner households with extremely low incomes (1,375 households) were paying more than 50 percent of their income for housing. Additionally, 1,370 low-income owner households were overpaying for housing, with 61.3 percent, or 840 households, paying more than 50 percent of their income on housing.

This indicates an existing need for more affordable units across the county. Many of the County's programs are geared toward supporting and assisting in the development of affordable units in the county, particularly the programs listed in Goal 2. Table A-24 describes the extent of overpayment in the county.

TABLE A-24
HOUSING OVERPAYMENT BY INCOME CATEGORY

Percent of Income Spent on Housing	Income Category					Total Households
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
Renters						
<30%	1,075	970	2,070	1,200	4,805	10,120
30%-50%	915	1,940	1,505	245	20	4,625
>50%	3,610	1,225	110	0	0	4,945
Total Overpaying Households	**4,525**	**3,165**	**1,615**	**245**	**20**	**9,570**
Owners						
<30%	580	1,055	2,200	1,595	13,265	18,695
30%-50%	280	530	1,325	485	1,320	3,940
>50%	1,375	840	495	20	145	2,875
Total Overpaying Households	**1,655**	**1,370**	**1,820**	**505**	**1,465**	**6,815**

Source: CHAS 2013-2017

Housing Authority

Residents of Imperial County are served by the Imperial Valley Housing Authority (IVHA). IVHA provides public housing and administers the Section 8 Housing Choice Voucher Program. IVHA owns and manages 943 consistently occupied rental units for lower-income families, seniors, disabled persons, and farmworkers in locations throughout the county.

The Housing Choice Voucher Program provides recipients the opportunity to rent housing of their choice in the private market. The program provides rent subsidies to private landlords on behalf of participant households.

IVHA administers a total of 1,677 vouchers throughout the county. Between 6,000 and 7,000 applicants are on the Public Housing and Housing Choice Voucher waiting lists.

Preservation of Assisted Units at Risk of Conversion

Overview

State Housing Element law requires an analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years (through 2031) due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and development of programs aimed at their preservation. The following must be included in each Housing Element as part of its preservation analysis:

- An inventory of assisted housing units at risk of converting to market rate within 10 years.
- An analysis of the costs of preserving and/or replacing these units.
- Resources that could be used to preserve the at-risk units.
- Program efforts for preservation of at-risk units.
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period.

Use restrictions, as defined by state law, means any federal, state, or local statute, regulation, ordinance, or contract that, as a condition of receipt of any housing assistance (e.g., rental subsidy, mortgage subsidy, mortgage insurance) to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

Assisted Housing Inventory

Most assisted housing is located in the incorporated cities of the county where necessary services are located. However, as shown in Table A-25, eight assisted housing developments provide 367 affordable housing units in unincorporated areas of the county. The County has used a variety of funding sources to

provide affordable housing to residents, including Community Development Block Grant (CDBG), HOME, Tax Credits, Rural Development loans, and other HUD assistance.

Affordable units are considered "at risk" if they are eligible to convert to market rate within 10 years. Table A-25 shows that, while there are no units at risk of expiring by 2031, the loan for Heber Village is eligible to be paid off at any time, thus putting this property at risk of conversion. The County has included Program 24 to reach out to the owners of Heber Village to express their desire to preserve affordability and complete the appropriate steps if the owners are not interested.

TABLE A-25
ASSISTED HOUSING DEVELOPMENTS IN UNINCORPORATED IMPERIAL COUNTY

Development	Location	Total Units	Affordable Units	Funding Source*	Earliest Date of Conversion
QHA Homes II	Fort Yuma Indian Reservation	38	37	LIHTC	2073
Sierra Vista Apartments	Seeley	48	47	LIHTC	2053
QHA Homes I	Fort Yuma Indian Reservation	44	44	LIHTC	2070
Villa Paloma aka Heber Family Apartments II	Heber	72	71	LIHTC	2061
Heber Family Apartments	Heber	81	80	LIHTC; HUD	2059
Heber Village	Heber	24	24	USDA	2036**
Sunset Garden Apartments	Heber	40	40	USDA	2041
Desert Sunrise Apartments	Heber	24	24	USDA	2034
Total Units		371	367		

Source: California Housing Partnership Corporation 2021

** LIHTC = Low-Income Housing Tax Credit; HUD = United States Department of Housing and Urban Development; USDA = United States Department of Agriculture*

*** The owners can apply to prepay the loan at any time, making this project at high risk of conversion to market rate.*

Resources for Preservation

The types of resources needed for preserving at-risk units fall into three categories: (1) financial resources available to purchase existing units or develop replacement units; (2) entities with the intent and ability to purchase and/or manage at-risk units; and (3) programs to provide replacement funding for potentially lost Housing Choice Voucher Program rent subsidies, otherwise known as the Section 8 program.

A variety of federal and state programs are available for potential acquisition, subsidy, or replacement of at-risk units. Due to both the high costs of developing and preserving housing and limitations on the amounts and uses of funds, a variety of funding sources would be required. Several sources of funding are available to Imperial County for preservation of assisted, multifamily rental housing units to assist with purchasing units or providing rental subsidy, including CDBG or HOME funds. For older buildings with expiring affordability, funding for substantial rehabilitation may also give the County an opportunity to reinstate affordability requirements. HUD may provide Section 8 Tenant Protection Vouchers to subsidize rents for tenants in properties at risk of loss because of expiration due to loss of affordability associated with mortgage pre-payment.

When affordable housing units have the potential to convert to market-rate, due typically to the expiration of an affordable housing agreement or expiration of funding, there is a risk that tenants in those affordable units will be displaced. Certain companies and organizations can be certified as eligible to purchase buildings where a federally assisted mortgage is due to be prepaid. No qualified entities were listed as being interested in purchasing at-risk buildings specifically for Imperial County. The following qualified entities are a portion of those listed as potential purchasers of at-risk units in all counties in California:

- Veritas Urban Properties, LLC
- Catalyst Housing Group, LLC
- JEMCOR Development Partners
- Jonathon Rose Companies
- Preservation Partners Development
- Dawson Holdings, Inc.
- Mesa Realty Advisors
- HCD
- Lincoln Avenue Capitol, LLC
- Eden Housing, Inc.
- GAL Affordable LP
- Highland Property Development, LLC
- American Community Developers, Inc.
- Berkadia
- California Commercial Investment Group
- Colrich Multifamily Investments, LLC

Strategies for Preserving Affordable Housing

Acquisition - For units at risk of conversion, qualified non-profit entities must be offered the opportunity to purchase buildings to maintain affordability.

The factors that must be used to determine the cost of preserving low-income housing include property acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables, such as condition, size, location, existing financing, and availability of financing (governmental and market). Looking

at multifamily buildings throughout the County, prices ranged from $62,500 per unit for a six-unit building in El Centro to $175,000 per unit for a quadplex in Calexico. While all of the units listed for sale in May 2021 were in incorporated jurisdictions of Imperial County, purchasing residential units in unincorporated Imperial County will likely have a similar price range depending on where in the county the units are located. If the property needs significant rehabilitation, or financing is difficult to obtain, it is important to consider these factors in the cost analysis.

In addition to the cost of acquisition, the availability of housing presents another challenge for preserving affordable housing. In May 2021, just five multifamily properties were listed for sale in Imperial County.

Preservation - Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as the Section 8 Housing Choice Voucher program. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair-market rent on the unit. Based on HUD's fair-market rents, the total cost to subsidize rental costs over 20 years for a very low-income household would be $36,720 for a two-bedroom home and $117,840 for a three-bedroom home.

Replacement with New Construction – 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. Looking at a sample project from loopnet.com in May 2021 with 272 assisted units on 17 acres, the cost for land acquisition is approximately $12,000 per unit, or $3,264,000 total. In March 2020, the Terner Center reported that multifamily construction costs average approximately $222 per square foot; therefore, the cost per unit for construction for 800-square-foot units is $177,600 per unit, for a total construction cost of $48,307,000. Based on the total cost of building this development, it can be estimated that the per-unit cost to replace low-income housing would be $189,600.

Cost of Preservation versus Replacement

The cost to the County of preserving units projected to expire in 2031 is estimated to be less in most cases than replacing the units through new construction. Replacing the units with rehabilitated units may be cost-effective in some instances. Actual costs involved in each option will depend on the rental and real estate market situations at the time the affordability restrictions on these projects expire.

Extending low-income use restrictions to preserve the units as affordable may require financial incentives to the project owners. Other scenarios for preservation would involve purchase of the affordable units by a nonprofit or public agency, or local subsidies to offset the difference between affordable and market rents. Scenarios for preservation depend on the type of project at risk.

Assessment of Fair Housing

Assembly Bill (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, affirmatively further fair housing 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."

AB 686 requires the County, and all jurisdictions in the state, to complete three major requirements as part of the Housing Element update:

1. Conduct an AFH that includes a summary of fair housing issues; an analysis of available federal, state, and local data knowledge to identify patterns of segregation or other barriers to fair housing; and prioritization of contributing factors to fair housing issues.
2. Prepare the Housing Element Land Inventory and identification of sites through the lens of AFFH.
3. Include a program in the Housing Element that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes and addresses contributing factors identified in the AFH (applies to Housing Elements beginning January 1, 2019).

In order to comply with AB 686, the County has completed the following outreach and analysis.

Outreach

As discussed in the "Public Participation" section of the Housing Element in Chapter 1, Introduction, the County held two virtual community workshops, three individual stakeholder consultations, and conducted a brief survey that was paired with a video overview of the Housing Element update for residents and stakeholders to review and respond to. The County offered the presentations at community workshops and flyers in both English and Spanish.

The two community workshops were held online in April 2021 and offered presentations in both English and Spanish. Prior to holding these workshops, the County reached out to several community organizations in an attempt to identify in-person meetings to attend to improve access to the presentation for residents. However, the organizations noted that meetings were not being held regularly and would not align with the Housing Element update schedule; therefore, the County elected to hold the workshops online and provide a video overview that is available on the County's website on-demand for all residents. At the community workshops, two public comments were received: one was about a potential student housing site to be located outside the City of Brawley, and the other expressed concern regarding the conversion of family units for farm labor (H2A) housing. The County expressed interest in discussing the student

housing further with the organization and confirmed that units are not being lost to conversion to H2A housing. No public comments or feedback was received related to fair housing. Recordings of the presentation are available on the County's website.

In January and February 2021, the County reached out to 10 community organizations, fair housing advocates, service providers, and other stakeholder groups to solicit one-on-one feedback regarding housing needs in the county. Of these 10 organizations, 3 participated in an individual consultation. The primary fair housing concerns identified by these stakeholders were:

- A severe shortage of affordable housing;
- Demand for rental assistance that exceeds what is available; and
- Insufficient or inadequate transitional housing for homeless individuals and families.

All three stakeholders emphasized a need for housing for homeless and low-income residents throughout the county. The collection process for this qualitative data is described in greater detail in the Public Participation section of this Housing Element and the feedback informed this assessment of fair housing and associated programs identified in Table A-26A.

Assessment of Fair Housing Issues

California Government Code Section 65583 (10)(A)(ii) requires Imperial County to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Since 2017, the California Tax Allocation Committee (TCAC) and HCD have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators in an effort to provide evidence-based research for policy recommendations. This effort has been dubbed "opportunity mapping" and is available to all jurisdictions to assess access to opportunities within their community. Imperial County is unique in that most residents live along the highway corridor in the center of the county in communities that are located north to south from the Salton Sea to the California-Mexico border. Ocotillo, Palo Verde, and Winterhaven are the only communities located outside of this central area.

As shown in Figure B-1, TCAC/HCD Opportunity Areas, the 2021 TCAC/HCD Opportunity Areas designated the area surrounding the Salton Sea and adjacent to the California-Mexico border as low-resource. The communities of Desert Shores, Salton Sea Beach, Bombay Beach, Salton City, and Niland are in low-resource areas, Heber is in a moderate resource area, Seeley is in a high-resource area, and Winterhaven is in a highest resource area. There is insufficient data to identify the resource categorization of the communities of Ocotillo or Palo Verde. There are no areas identified as high segregation and poverty in Imperial County. The distribution of resource areas reflects where the greatest concentrations of residents are located in the county.

Some of the indicators identified by TCAC and HCD to determine the access to opportunities include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. These indicator scores decrease as the level of designation decreases from higher- to lower-resourced areas. Low-resource areas typically have limited access to education and employment opportunities and may have poor environmental quality. Areas of high segregation and poverty are those that have an overrepresentation of people of color compared to the County as a whole, and at least 30 percent of the population in these areas is below the federal poverty line ($26,200 annually for a family of four in 2020).

It is important to note that a highest resource area can still have high concentrations of poverty, as is the case in Winterhaven. Resource areas designations are based on a variety of factors, as described above. While Winterhaven has high concentrations of poverty, it also has the best access to proficient educational opportunities in unincorporated Imperial County, is in close proximity to medical centers and hospitals, grocery stores, and large commercial and retail centers that provide employment opportunities. There are also a variety of transit opportunities for residents of Winterhaven, as described in the Access to Opportunity section. Given the context of Winterhaven, it is worth noting that even areas of high opportunity can still have fair housing issues and are included in this assessment.

Patterns of Integration and Segregation

Race and Ethnicity

As shown in Figure B-2, Predominant Population - Hispanic Majority, the majority of residents west of the East Highline Canal in Imperial County identify as Hispanic or Latino, with the predominant Hispanic majority surrounding, and south of, the City of El Centro (including Heber) and north of the City of Westmorland (including Niland). Heber has the highest percentage of residents that identify as Hispanic or Latino among the unincorporated communities of Imperial County, reflecting ethnic trends in incorporated jurisdictions in the county. In the southeastern corner of the county, where the community of Winterhaven is located, there is a slim (less than 10 percent) number of residents who identify as Native American. East of the East Highline Canal, with the exception of Winterhaven and the adjacent Fort Yuma Indian Reservation, is predominantly White. While the dominance of non-White, Hispanic residents is more common in SCAG jurisdictions than in many areas of the state, Imperial County has one of the largest areas in the SCAG region where the population predominantly identifies as Hispanic or Latino. Given the county's shared border with Mexico and trends of migrant and day workers crossing the border, this demographic makeup has dominated Imperial County since its inception.

As a result of the range in demographic identities throughout the county, Imperial County scores a diversity index score of over 70 in much of the county, with 100 being perfect diversity, and only the area between El Centro, Holtville, and Calexico, excluding Heber, having a lower diversity index score (Figure B-3, Diversity Index 2018). The northeast border of the Salton Sea just south of the Imperial County boundary has been identified as having a significantly lower diversity index score than the rest of the county; however, this area is largely unpopulated and likely does not reflect the area accurately. The high level of diversity in Imperial County has remained relatively constant in recent years, which the only notable change being an increase

in diversity in the eastern half of the county. The diversity index scores in unincorporated Imperial County reflect the more rural areas of the SCAG region as a whole, such as eastern Riverside County and eastern San Bernardino County. Imperial County tends to have a higher rate of diversity in both its incorporated and unincorporated communities than urbanized areas of SCAG jurisdictions.

Income

In addition to racial and ethnic variation between the eastern and western portions of the county, Imperial County residents report a higher median income in and around incorporated jurisdictions and the western half of the county, as seen in Figure B-4, Median Income (2015-2019). While there is a lower percentage of the population that falls into the low- or moderate-income category in eastern Imperial County (Figure B-5), this is likely due to the size of the population rather than a higher median income overall. In contrast, there is a lower median income near all shores of the Salton Sea, where several unincorporated communities are located. There has been an increase in the areas that report a higher median income, more reflective of areas outside of Imperial County, since 2014, when only the areas between, and including, the cities of El Centro and Brawley had a median income significantly above the poverty line. However, poverty is still a dominant issue in Imperial County. More than 20 percent of residents in all unincorporated communities, had an income below the poverty line in 2019, according to ACS. This was even higher in Winterhaven and the area west of the City of Calipatria, where more than 40 percent of residents had an income below the poverty line. While SCAG jurisdictions, like most jurisdictions in the state, do have some areas of concentrated poverty, Imperial County has a lower median income and higher rates of concentrated poverty than most of the region. As discussed previously in this chapter, a majority of residents of the unincorporated county are lower income, indicating that while segregation based on income in unincorporated Imperial County may not be an issue, access to affordable housing is a fair housing issue in the county. To combat this, the County has included Program 13 to provide incentives for affordable housing and Program 5 to work with the Imperial Valley Housing Authority to acquire and rehabilitate affordable multifamily units.

As shown in Figure B-4, Median Income (2015-2019), the median income in western communities and jurisdictions throughout the SCAG region is higher than in eastern portions of the region. The range in median incomes in highly urbanized counties, such as Los Angeles, Orange, and Ventura, is significant, with block groups with extremely high median incomes in coastal communities, while there are more block groups with median incomes less than the state median in more inland communities. Eastern Riverside County and San Bernardino County reflect the income patterns found in Imperial County, with higher rates of poverty in rural and agricultural communities. The stark contrast between eastern and western SCAG communities and jurisdictions has persisted throughout the history of this year and is tied to patterns of development and the dominant industries. Rural areas in the region have extensive desert and have not typically been conducive to dense urban development and, instead, have smaller communities with lower median incomes due to proximity to jobs and economic opportunities. Imperial County is reflective of the eastern SCAG trends.

Racially and Ethnically Concentrated Areas of Poverty

While there are no racially and ethnically concentrated areas of poverty (R/ECAPs) in unincorporated Imperial County, there are two in incorporated jurisdictions, one in the City of El Centro and one in the City of Calexico. R/ECAPs, as defined by HUD, are areas in which 50 percent or more of the population identifies as non-White and 40 percent or more of individuals are living below the poverty line. While there are no HUD-designated R/ECAPs in unincorporated communities, the areas immediately north of the Imperial County boundary along the shores of the Salton Sea in Riverside County are considered a R/ECAP. While planning for these is not within the jurisdiction of Imperial County, the County has accounted for the presence of these in the analysis of nearby unincorporated communities (Desert Shores and Salton Sea Beach), while reviewing patterns of segregation, access to opportunity, and housing need.

Racially Concentrated Areas of Affluence

Similarly, to R/ECAPs, there are no areas that meet the definition of a racially concentrated area of affluence (RCAA) in unincorporated Imperial County. A RCAA was defined in 2019 in the HUD's Cityscape periodical by Goetz et al. in *Racially Concentrated Areas of Affluence: A Preliminary Investigation* as a census tract in which 80 percent or more of the population is White and has a median income greater than $125,000 annually. Using this definition, there are no census tracts in Imperial County that can be identified as a RCAA. In the SCAG region, RCAAs are located primarily in coastal communities and jurisdictions, with none in Imperial, Riverside, or San Bernardino counties. All census tracts in unincorporated Imperial County have a median income equal to or less than the State median income of $87,100, indicating that there are no areas of concentrated affluence.

Familial Status

In most of the populated areas of the county, west of the East Highline Canal, approximately 40 to 50 percent of households were populated by married-couple families with children. However, in the areas surrounding the City of Westmorland, there is a higher rate of single-parent, female-headed households with children than all other areas of unincorporated Imperial County. Adults living with a spouse make up a larger share of the population in unincorporated areas adjacent to incorporated cities than in more remote areas, such as in Salton City and neighboring communities. However, while there is a slight increase near incorporated areas, there are no areas with a significant concentration, or lack of, this group. Married couple households with children are much more prevalent in Imperial County than single-parent or couples without children. While this population makes up the largest share of the family types, they are a higher percentage of the population in Seeley and surrounding the cities of Brawley and Holtville than anywhere else in the county.

Familial trends mirror the SCAG region closely, with higher rates of families with children located near incorporated jurisdictions and more single-adult households in rural areas. The County will promote the CalWorks program to all residents, with a focus on the areas with a higher rate of female-headed households, to ensure all residents, regardless of familial status, have access to housing and services (Program 21).

Persons with Disabilities

According to the 2015-2019 ACS (Figure B-7), the communities of Bombay Beach, Ocotillo, Salton City, Winterhaven, Desert Shores, and Salton Sea Beach each have a percent of the population that identifies as having a disability that is greater than the percentage of unincorporated Imperial County as a whole (15.1 percent). However, of these communities, Bombay Beach and Salton Sea Beach have experienced a significant decline in the percentage of the population with a disability since 2014. The communities with the lowest percentage of the population with a disability are those closest to incorporated jurisdictions, including Heber, Niland, and Seeley. Some jurisdictions, such as Palo Verde, has a large senior population, which tend to have higher chances of disability.

Across the SCAG region, the percentage of the population with a disability is lower in and near incorporated jurisdictions or more urbanized communities, as is found in Imperial County. This may be due to the larger populations in these areas, increasing the number of residents without a disability, or increased number of young persons living near urban centers, which is a population that typically has fewer disabilities than seniors. The areas with higher rates of persons with disabilities, the areas further from incorporated and urban centers, tend to be those areas with heavy industries such as agriculture, mining, and other industries that have higher injury rates than a standard office job might. This may contribute to the trend seen throughout the SCAG region with higher rates of disabilities in more rural, and typically less affluent, areas. This trend has remained steady in the last decade, with few shifts in concentrations of persons with disabilities.

Overall, Imperial County reflects the disability trend seen across the SCAG region, which has higher rates of disability in rural, unincorporated areas, particularly where agriculture is the dominant industry, and lower rates near incorporated cities such as El Centro.

Access to Opportunity

Employment Opportunities

While there is limited housing in eastern Imperial County due to the geography, HUD estimates that this area is among those with the closest proximity to jobs in the County. According to HUD's 2017 analysis of proximity to jobs, nearly the whole eastern half of Imperial County is considered close to jobs (Figure B-8). While the employment opportunities may not be geographically close in eastern Imperial County, they employ a large number of people and are therefore weighted more heavily by HUD. While the map indicates that jobs are concentrated in the eastern half of the county, an analysis of commute types found that the job access varies significantly and is difficult to measure for much of the unincorporated county. The mean commute time to jobs in the county in 2019, according to ACS, was 22.1 minutes. Niland, Salton Sea Beach, and Seeley, all had shorter mean commute times than this (19.1, 10.8, and 17.9 minutes, respectively). Mean commute times were not available for Bombay Beach, Desert Shores, Ocotillo, Palo Verde, or Winterhaven. Due to the high percentage of residents in these communities who are seniors that may be retired, there is less need for jobs in some of these areas. To assist residents of the county who are seeking work to access job opportunities and improve their economic mobility, the County will promote

the CalWorks program to provide assistance for eligible low-income families with children to meet basic needs and enter or re-enter the workforce (Program 21). The County will also use the meetings with transit agencies to identify any unmet transit demand for access to employment centers (Program 21).

When compared to the SCAG region, Imperial County residents have the shortest mean commute time to work, according to ACS. The mean commute time in Imperial County is 22.1 minutes, with the next shortest being 27.8 minutes for Ventura County. The counties of Orange, Riverside, and San Bernardino all have mean commute times of over 30 minutes. This suggests that access to employment opportunities is better for Imperial County residents, from a perspective of physical proximity, than for all other counties in the SCAG region. In contrast to the trends found in Imperial County, there is a higher concentration of employment opportunities in urban communities of the SCAG region than rural areas. While distribution of jobs differs between Imperial County and other SCAG jurisdictions, primarily due to development of larger urban areas, Imperial County residents have closer access to employment opportunities.

Educational Opportunities

According to the 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, only six schools in unincorporated Imperial County were ranked. These were located in Winterhaven (three ranked schools), Niland (one ranked school), Heber (one ranked school), and Seeley (one ranked school). Of these, only the schools in Heber and Niland ranked above the 50th percentile compared to other schools in the state. This ranking, however, is not comprehensive. In addition to these schools, there is one additional school in Winterhaven, six in Heber, and two in Salton City. Bombay Beach, Desert Shores, Ocotillo, Palo Verde, and Salton Sea Beach do not have a school at any level. While the ACS reports that there are no residents under age 18 in Bombay Beach and Palo Verde, Desert Shores, Ocotillo, and Salton Sea Beach do have small youth populations that need school facilities. While it is likely that there are children in both Bombay Beach and Palo Verde, there may not be enough to support a full school. The concentration of schools in communities further from the Salton Sea indicates disproportionate access to education across unincorporated Imperial County. This is further supported by Figure B-9, TCAC/HCD Educational Score, which depicts that the most positive educational outcomes are anticipated in communities near incorporated jurisdictions and in Winterhaven. While Imperial County differs from the rest of the SCAG region in many ways, lack of access to schools in rural and unincorporated communities reflects the trends seen in San Bernardino and Riverside Counties. For example, in San Bernardino and Riverside Counties and many urban areas in other counties with low median incomes, have low expected educational outcomes in eastern portions of these counties and areas with higher median incomes, similar to Imperial County. Throughout the SCAG region, higher educational outcomes are often expected in areas with higher median incomes, though not exclusively. To improve access to educational opportunities for residents of Imperial County, particularly in areas with low median income and access to resources, the County has included Program 21 to coordinate with Imperial County Transportation Commission to ensure that bussing is available for all residents to access schools.

Mobility

Imperial County residents are served by Imperial Valley Transit (IVT), operated by First Transit, Inc., and Yuma County Area Transit (Winterhaven). IVT offers fixed routes, deviated fixed routes, and remote zones routes. The fixed and deviated fixed routes operate primarily between the incorporated jurisdictions, Seeley, Niland, and Heber. Deviated fixed routes allow passengers to request service one day in advance for the communities of Seeley, Ocotillo, and the east side of the Salton Sea. The remote zone route operates once a week from Brawley to Niland and Bombay Beach, and back. There is no transit offered to the communities on the western shore of the Salton Sea, including Salton City, Salton Sea Beach, and Desert Shores. All Transit is a data tool that measures access to transit, connectivity, and service availability. According to All Transit, the Imperial County has a transit performance score of 0.1 compared to 5.5 for the SCAG region as a whole. As with other services and opportunities identified in this assessment, public transit is more readily available in the urban centers of the western SCAG region with several transit providers including Riverside Transit Agency, Los Angeles Metro, Orange County Transportation Authority, among others. Similar to Imperial County, eastern Riverside County and San Bernardino County have low transit scores due to limited transit routes and frequency. To better meet the needs of residents, the Imperial County Transportation Commission conducted an unmet Transit Needs Survey between March and April 2021. The County will work with the Transportation Commission to review unmet needs and assist with applying for funding to expand routes to improve mobility for residents, as necessary (Program 21). Residents of Winterhaven are served by Yuma County Area Transit, which provides connections to El Centro and Yuma, Arizona. Service to El Centro is offered four days per week, twice per day. Access to Disability Services

To meet the needs of residents with disabilities, First Transit, Inc. operates IVT MedTrans, a non-emergency transit service offered between Imperial Valley and San Diego County to connect residents with medical facilities and doctors' offices. Additionally, First Transit, Inc. also operates IVT Access, an advanced reservation curb-to-curb transportation service. IVT Access includes vehicles with wheelchair lifts and is intended to serve individuals with physical or cognitive disabilities that are unable to use the standard routes offered by IVT.

Environmental Health

In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. A community with a high score, is one with higher levels of pollution and other negative environmental indicators. As shown in Figure B-10, Imperial County has high pollution levels throughout much of the County, with the exception of Winterhaven and the tract east of the Niland. The areas with the poorest environmental health are those surrounding urban centers, such as the cities of El Centro, Brawley, and Westmorland, likely due to increased traffic emissions and industrial uses. Environmental conditions in Imperial County are similar to dense, urban cores in the SCAG region (e.g. cities of Riverside, Los Angeles, Pomona, etc.), where traffic and other factors decrease the level of environmental health. The SCAG region is unique in that it has dense urban areas and expanses of desert and agricultural lands. In each type of geography, there are different causes of poor environmental conditions ranging from vehicular congestion to heavy equipment. However, as seen in Figure B-10, much

of coastal Southern California has positive environmental conditions. An environmental justice analysis conducted by SCAG in 2019 found that, throughout the region, the areas with the poorest environmental conditions typically coincided with concentrations of low-income populations. This reflects the findings in Imperial County where there is a significant low-income population and poor environmental conditions.

The Imperial Valley Environmental Justice Taskforce comprises of residents, environmental enforcement officers, and community leaders in Imperial County. The members of the taskforce, which does not include County staff, meet monthly to discuss environmental monitoring and identify areas of concern. The County will meet with the Taskforce to identify steps the County can take to improve environmental conditions for residents (Program 21). Additionally, concurrently with the Housing Element update, the County is updating the Environmental Justice Element of the General Plan to identify communities that are disproportionately affected by pollution and other hazards that contribute to negative health effects, exposure, and environmental degradation to inform policies and programs to be included in the Environmental Justice Element.

Disproportionate Need and Displacement Risk

Overcrowding and Overpayment

As discussed previously in this chapter under the "Housing Characteristics" section, overcrowding is a more significant problem among renters in unincorporated Imperial County than owners. While 7.2 percent of all households in the unincorporated county are overcrowded, 18.1 percent of renters are overcrowded, while approximately 2.2 percent of owners are living in overcrowded situations. As seen in Figure B-11, the highest rate of overcrowding among renters is present in the communities of Heber (32.4 percent) and Salton City (23.3 percent), and the highest rate of overcrowding among renters is in Desert Shores (10.2 percent). Overcrowding is also present, at a lesser rate, in Bombay Beach, Niland, and Seeley; no overcrowding is reported in Ocotillo, Palo Verde, or Salton Sea Beach. The trends of overcrowding in Imperial County reflect the region, with higher concentrations of overcrowding in areas with higher poverty. Overcrowding is more prevalent in most urban and suburban centers in SCAG than in rural areas, with most of these in western SCAG. This includes cities of Los Angeles, Santa Ana, Anaheim, Ontario, Riverside, Perris, San Bernardino, Oxnard, and more. In these areas, more than 20% of residents in much of these cities are living in overcrowded situations. Overcrowding in these areas is much more significant than anywhere in Imperial County, even considering the increased rates in Heber and Salton City. The higher rate of overcrowding typically means that either appropriately sized housing is unaffordable to current residents, or that the type of housing available does not meet the community's need. In either case, overcrowding means there is a disproportionate need for affordable, larger housing units in these areas. The County will meet with the developers to identify barriers to constructing larger housing (Program 13) and has included several other programs to incentivize development of affordable housing.

In addition to overcrowding, overpayment is also a significant issue in Imperial County. As shown in Figure B-12, Overpayment by Renters (2015-2019), renter households overpaying for housing is a chronic issue across the developed areas of Imperial County and the region. Approximately 48 percent of all renter households in Imperial County are overpaying for housing, with 52 percent of those severely overpaying.

Additionally, approximately 36 percent of owners are overpaying for housing, with 42 percent of those severely overpaying. This issue has been present in recent years, though the areas with the greatest rate of overpayment have shifted along with the increase in poverty, as shown in Figures B-12 through B-15. Renters overpaying for housing have concentrated in the center of the county, as shown in Figure B-12, while owners overpaying have shifted from the western to the eastern areas of the county (Figure B-14, Overpayment by Homeowners [2015-2019]). The shift in concentration of overpayment reflects changes in poverty distribution in Imperial County. Overpayment among owners has decreased slightly throughout the SCAG region, similar to Imperial County. Overpayment is pervasive throughout the region, though the highest rates of overcrowding occur in the City of Los Angeles and surrounding areas. In other areas of SCAG, overpayment among homeowners is similarly high and presents a barrier to stable housing for all of these households. Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs. To address displacement risks due to overpayment, the County will provide incentives to encourage affordable development and will develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities within the county (Program 21).

The shortage of housing in Imperial County may further both overcrowding and overpayment as residents may have to "double up" due to lack of housing options or to be able to afford the housing that is available. In 2019, the vacancy rate for rental units was 1.1 percent and 1.2 percent for ownership units. These vacancy rates are typically considered low as they do not provide enough availability for residents to easily relocate due to any circumstances that may arise, such as a change in job, income, or growing family. The County has included Program 13 to incentivize development to increase the supply and enable mobility for residents with a disproportionate risk for displacement in Imperial County. Substandard Housing

Housing condition presents another issue in Imperial County that may increase displacement risk for residents. Approximately 56 percent of housing in the unincorporated areas of the county are older than 30 years, which is typically the age at which housing units begin to need repairs or rehabilitation to meet current standards or fix features that have begun to degrade. Additionally, 23 percent of the housing stock in Imperial County is manufactured homes, which often need more frequent maintenance to remain in good condition or may be unpermitted and in substandard condition (see "Housing Stock Conditions" of the Community Profile). California Rural Legal Assistance and other stakeholders also emphasized the poor conditions of housing for farm workers. Given the state of existing housing, especially for lower-income households, the County will promote available rehabilitation programs to assist homeowners with rehabilitation or repair and, when funding permits, will provide relocation assistance for tenants who are temporarily or permanently displaced as a result of rehabilitation efforts (Programs 11 and 22).

Compared to other counties in the SCAG region, the unincorporated areas of Imperial County have a newer housing stock, which would typically indicate better housing stock. For example, in Ventura County 76.7 percent of the housing stock is older than 30 years, 75.3 percent of the housing stock in Orange County, and 69.3 percent in San Bernardino County. However, similarly to Riverside County, there is a significantly higher percentage of the housing stock that is manufactured homes that, while potentially newer, need maintenance more frequently. Additionally, the median income is significantly higher in other jurisdictions of the region when compared to Imperial County. Therefore, it is likely that residents in other areas of the SCAG region have a greater ability to afford regular maintenance on their homes and may maintain their

condition overtime. Given the composition and age of the housing stock in Imperial County paired with a low median income, it is likely that housing conditions are less deteriorated in other areas of the region. Due to limited staff capacity, a housing condition survey has not been conducted recently. However, it is expected that substandard housing, while present throughout the unincorporated county, is a more significant issue in communities with higher rates of poverty, such as Niland, Salton City, and Desert Shores. To more fully understand the rehabilitation needs in Imperial County, with an emphasis on mobile home parks, the County will explore conducting a housing conditions survey as feasible (Program 21).

Homelessness

As discussed in the Special Needs Group section of the Housing Needs Assessment, there are approximately 1,052 homeless persons living in unincorporated areas of Imperial County, according to the Imperial County Department of Social Services. Persons experiencing homelessness, or at risk of becoming homeless, are typically extremely low-income and are displaced from housing due to inability to pay or other issues. However, of this large homeless population, 885 reside in Slab City, a community in the Sonoran Desert made up of transient residents striving to live "off-the-grid." Therefore, while this population meets the definition of homeless, they are not seeking homeless services or support to secure stable housing. While there are several shelters and homeless resources in Imperial County available to those homeless residents in need (Table A-16), there are limited services available outside of incorporated jurisdictions. In order to facilitate the construction of emergency shelters, the County has included Program 15 to allow low-barrier navigation centers in all zones that allow mixed-use and non-residential zones that allow multifamily uses. The County also encourages development of housing for extremely low-income housing through outreach to developers, financial and technical assistance, expedited processing, and other incentives identified in Program 18.

Displacement Risk

The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the County may also indicates an increased risk of displacement due to housing costs outpacing wage increase, a trend that is felt throughout the region, state, and nation. According to Zillow, the average home value in Imperial County has increased 16.6 percent annually since 2012. While housing costs have increased rapidly, wages have not kept pace. The average income in Imperial County has increased approximately 2 percent annually, from $54,947 in 2010 to $64,355 in 2019 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in Imperial County despite the low cost of housing itself compared to the region, state, and nation, and may prevent low-income households from remaining in their homes over time. In order to address affordability challenges, the County will encourage and incentivize development of affordable housing units, particularly in high opportunity areas and will develop a program to connect lower-income residents with affordable housing opportunities (see Table A-26A).

Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, and when the household is overcrowded. Each of these presents barriers to stable housing for the occupants. In Imperial County, overpayment is pervasive and is

not necessarily linked to areas with a lower median income. However, as discussed under Patterns of Integration and Segregation, there are higher rates of poverty near Niland and surrounding the Salton Sea. As shown in Figures B-12 through B-15, the rate of overpayment is slightly higher in these areas of the county as well. The County has included Programs 5, 14, and 24 to increase the supply of affordable housing by providing assistance with acquisition, rehabilitation, and construction; providing technical assistance, streamlining, and other incentives; and working with affordable housing providers to preserve units.

Other Relevant Factors

Housing and Demographic Trends

Since 2010, according to the American Community Survey, the number of occupied housing units has decreased in almost all unincorporated communities in Imperial County, with the exception of Desert Shores, Salton City, and Seeley. While there was only a 1 percent increase in total occupied housing units in Seeley from 2010 to 2019, the increase was largely among ownership units, with a 13 percent increase in owners and a 10 percent decrease in renters. Salton City also saw a larger increase in in owner occupants than renters, though on a much larger scale. Overall, there was a 289 percent increase in occupied housing units in Salton City, with a 330 percent increase in owners and 205 percent increase in renters. This suggests significant growth concentrated in Salton City and supports feedback from County staff that there has been a rapid increase in inquiries regarding development in this community in recent years. In contrast to Salton City and Seeley, Desert Shores has seen a significant increase in the number of renters, rather than owners (154 percent increase in renters compared to 20 percent increase in owners). The growth of the renter population in Desert Shores is likely a result of a significant increase in the number of mobile homes, with a 141 percent increase in the supply of mobile homes in this community since 2010.

All unincorporated communities saw a decrease in the number of mobile homes since 2010 except for Desert Shores, which may support a migration of occupants of these units from other communities to Desert Shores. In contrast, Bombay Beach, Salton City, Seeley, and Winterhaven have experienced an increase in the number of single-family, detached units. There was an overall decrease in the number of units, of all types, in the communities of Heber, Niland, Ocotillo, Palo Verde, and Salton Sea Beach since 2010. Many households in these communities may have left for other communities seeing growth, though data does not track individual households across time.

The dramatic increase in the number of occupied rental units in Bombay Beach likely entered an existing, underutilized housing stock. In 2010, there was a rental vacancy of approximately 85 percent, that dropped to zero percent by 2019 according to American Community Survey estimates. The existing housing stock in Bombay Beach presented a mobility opportunity for residents that may have encountered challenges in securing rental housing in other communities where rental vacancy rates have remained low since 2010, such as Heber, Salton City, and Salton Sea Beach. However, limited access to resources in Bombay Beach limits access to opportunities for these residents.

The shift in unit types, tenures, and vacancy suggest growth occurring in communities surrounding the Salton Sea, despite greater access to jobs and other opportunities near incorporated jurisdictions. However, the interest from developers reported to the County to meet the demands for housing in Salton Sea

communities may support future opportunities directly in these neighborhoods. In order to address historic disinvestment that has left many parts of these communities without basic infrastructure, the County will conduct infrastructure needs in each colonias and meet with residents to prioritize investment and create safe and healthy living environments for current and future residents (Program 4). These efforts will be conducted in all colonias in Imperial County with the intent of improving infrastructure both to support growth, such as what is occurring in the Salton Sea area and preserve existing housing to reduce displacement risk in all communities.

History of Development and Investment

The geographic conditions in Imperial County postponed the start of development until after 1901, when the Imperial Canal was first opened to bring water from the Colorado River to the Imperial Valley. Bordered by desert and mountains, much of the county is not conducive to habitation and for much of Imperial County's history, population growth has been tied to water supply and agricultural success. The introduction of the Imperial Canal provided water for irrigation, which spurred an agricultural economy that brought farmers to the valley, and ultimately resulted in transportation connections to San Diego and railway lines that previously hadn't existed. This change further connected Imperial County to surrounding areas, stimulating growth. However, large-scale flooding and degrading soil quality stalled development in the early 1900s in Imperial County. It wasn't until 1940 when the All American Canal brought a stable water supply, and power, back to the County did farming and other local economies growth once again. The history of Imperial County has been tied closely to the terrain and limitations it presented and most development did not begin in the county until after national segregation trends such as redlining. There is no history of redlining in Imperial County, a practice in which federal home mortgage loans were systematically denied to minority households, and the industry in Imperial County draws workers from neighboring communities in Mexico, just across the border. As a result, while Imperial County has a higher poverty rate and lower median income than surrounding jurisdictions, many patterns identified in this assessment of fair housing are not related to county policies such as exclusionary zoning or racial covenants. The primary driver of segregation in Imperial County is access to economic opportunity and healthy neighborhoods, as described throughout this assessment.

In Unincorporated Imperial County, historical investment has been allocated based on need. However, while there has not been disproportionate allocation of investments, there has been a shortage overall in all unincorporated communities. Most communities are in need of basic infrastructure additions or improvements such as street lighting, sidewalks, gutters, and curbs. Due to a shortage of funding and staff capacity, there has been historic challenges to invest in all communities. County staff report that there are nine communities in the unincorporated areas that are considered colonias. A colonia is a community located within 150 miles of the United States-Mexico border that lacks basic infrastructure such as potable water, adequate sewer systems, and a shortage of safe and sanitary housing. The unincorporated colonias include Palo Verde, Niland, Heber, Ocotillo, Bombay Beach, Salton Sea, Poe, Seeley, and Winterhaven. While the infrastructure concerns and concentrations of poverty have been historically acknowledged, previous Colonias Master Plan updates lacked targeted policies and programs to make meaningful change, according to the Imperial County Workforce and Economic Development Department (ICWED). However,

since 2014 ICWED has contracted with Republic Services (Allied Waste) to conduct regular neighborhood cleanups in all unincorporated communities and has aggressively pursued funding to improve water and sewer infrastructure, provide housing rehabilitation assistance, and other improvements for public health and safety. The neighborhood cleanup program has resulted in the removal of 5,609,140 pounds of waste from all communities combined, including the removal of household hazardous waste. CDBG funding has been used to complete a Winterhaven public safety facility, Poe Colonia water and sewer improvements, Palo Verde water well improvements, and Seeley waterline improvements. Current CDBG projects include a Winterhaven water treatment plant, Niland public safety facility, housing rehabilitation in Salton Sea and Heber, and a Seeley fire station. In addition to these recent efforts, ICWED is working on a new update to the Colonias Master Plan that will include infrastructure needs assessments in all colonias and will designate specific targets for improvements. Staff reports that historic disinvestment has resulted in substandard conditions in most unincorporated communities but has increased efforts to address these issues in the last decade and will meet with residents to identify specific needs (Program 4). Infrastructure needs assessments will allow the County to prioritize the areas of greatest need to target funding.

Local Knowledge

In addition to County-led efforts to improvement investment strategies across Imperial County, staff has reported increased development interest in Salton City and the surrounding areas, as discussed earlier. Staff reported that areas surrounding Salton City, like other unincorporated communities, have limited infrastructure and, in some areas, no sidewalks, curbs, or gutters. This knowledge spurred the efforts to update the Colonias Master Plan (Program 4) to improve living conditions and infrastructure through targeted place-based revitalization and create stronger communities moving forward.

During the consultation process, stakeholders reported issues surrounding housing condition for farmworkers and lower-income households. Substandard housing conditions reported included lack of access to water and basic infrastructure as well as a shortage of housing, making it challenging for residents to move if their home, particularly manufactured or mobile homes, is in need of repair. The Imperial County Workforce and Economic Development (ICWED) Department echoed these concerns during the Housing Element update process. According to ICWED, many colonias lack basic infrastructure such as sidewalks, water access, and lighting. These present barriers to fair housing for residents of these communities. In order to address the concerns raised through local input and experience, the County departments are currently taking steps to improve the living conditions for existing residents of these communities, including:

Updating the 2013 Colonia Master Plan – County Unincorporated to identify long term plans for unincorporated areas

Preparing a Colonia Housing Infrastructure Needs Assessment in coordination with the Imperial County Transportation Commission that will be used to identify and prioritize infrastructure needs in each colonia and promote housing development

Submitted grant applications to fund the Housing Rehabilitation Program in Heber, Salton Sea Beach, and Niland

Secured $500,000 in HOME funds to implement the First Time Home Buyer program for all unincorporated areas, including colonias

In addition to these ongoing efforts, the County has also secured funding to complete water infrastructure improvements in Palo Verde, Seeley, and Winterhaven; public safety infrastructure improvements in Winterhaven and Niland; and to continue to conduct neighborhood cleanups. Several programs included in this Housing Element will further address fair housing issues highlighted through local input. These include coordinating with water and sewer providers to improve infrastructure, particularly in areas of concentrated poverty (Program 2), conducting the infrastructure assessment to update the Colonia Master Plan and targeting investment in place-based revitalization efforts (Program 4), conducting a survey of housing conditions for farmworkers to target rehabilitation efforts and work with employers to provide safe housing (Program 11), applying for funding to convert mobile home parks to ownership or put in control of the residents (Program 20), and continuing to apply for funding to provide general housing rehabilitation assistance throughout unincorporated areas (Program 21).

Mortgage Loan Denial Rates

Data related to home loan applications is made available annually through the Consumer Financial Protection Bureau, through the Home Mortgage Disclosure Act (HMDA). The Consumer Financial Protection provides mortgage data specific to census tracts as opposed to jurisdiction boundaries, so data for Imperial County includes census tracts in both incorporated and unincorporated areas.

In 2020, White applicants accounted for 5 percent of all mortgage loan applications for home purchase and 9 percent of all originated loans in Imperial County. While Hispanic residents make up approximately 76 percent of Imperial County's ethnic composition, Hispanic and Latino applicants comprised 36 percent of loan applications and 68 percent of originated loans. Black applicants represented less than one percent of both loan applications and originated loans and Asian applicants represented less than one percent of loan applications and 1 percent of originated loans, and other applicants (e.g. American Indian, Alaskan Native, Native Hawaiian other Pacific Islander, two or more races, and other) represented a total of approximately 20 percent loan applications and originated loans, reflecting a similar representation in Imperial County's population.

In 2020, applicants applied for three types of loans for home purchase: conventional, Federal Housing Administration (FHA), and Veterans Administration (VA) loan. In 2020, Black applicants had the lowest denial rates for conventional loans, Asian applicants the lowest denial rate for FHA loans and VA loans, and White applicants had the lowest denial rate for USDA loans. Hispanic and Latino applicants had the highest participation in each of the loan types and had denial rates of 10 percent for conventional loans, 8 percent for FHA loans, 13 precent for VA loans, and 6 percent for USDA loans, all of which are comparable denial rates to White applicants. Denial rates do not indicate that Hispanic or Latino residents had greater challenges securing loans than other racial and ethnic groups. However, the low participation rate by residents of minority groups may suggest difficulty building capital necessary to pursue home ownership and presenting a barrier to economic mobility.

To address the disparities in access to financial resources for underrepresented populations, Imperial County will coordinate with employers, service providers, and legal service providers to educate residents on rehabilitation and homeownership assistance programs, as well as other programs, to assist in financial independence (Programs 11, 12, 14, and 21).

Enforcement and Outreach Capacity

The County enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of County policies and code for compliance with State law and referring fair housing complaints to appropriate agencies.

The County reviewed and amended Division 5 of Title 9 (the Zoning Ordinance) to ensure compliance with fair housing law, and continues to examine land use policies, permitting practices, and building codes to comply with state and federal fair housing laws. Periodic reviews of the zoning code and policies confirm that, as the county changes, it continues to ensure and enforce that all persons have access to sound and affordable housing. The County has also included Programs 8 and 16 to amend the Zoning Ordinance to reflect new changes to State law and Program 23 to develop a proactive code enforcement program to connect lower-income households in areas of concentrated rehabilitation need with rehabilitation assistance.

In addition to assessing fair housing issues related to development standards, fair housing issues can include housing conditions and discriminatory behaviors by landlords. Imperial County complies with fair housing law regarding complaints by internally reviewing and responding to fair housing complaints and distributing fair housing information to the real estate industry and posting information in public buildings. To date, no fair housing complaints have been made to the County; therefore, the County has not enforced fair housing laws as a result of reported discriminatory action. Residents of Imperial County also have access to services provided by the California Rural Legal Assistance (CRLA), HUD's Department of Fair Housing and Equal Opportunity (FHEO), and the California Department of Fair Employment and Housing (DFEH).

CRLA serves low-income individuals and provides services for farmworkers in Imperial County. December 2020, CRLA shared that the complaints they receive regarding fair housing can range from housing discrimination against farmworkers, issues with landlords, to administrative complaints. They emphasized that housing issues such as discrimination by landlords or land use compatibility issues have resulted in undesirable housing conditions for farmworkers and substandard housing conditions due to lack of access to water or basic infrastructure for some low-income residents. The shortage of housing for extremely low-income individuals and short-term housing for migrant workers are two of the largest barriers to fair housing for residents that CRLA works with in Imperial County. CRLA does not track the number of complaints they receive from specific jurisdictions or regions so was unable to provide a number of cases that have been pursued and enforced in Imperial County. To address the housing conditions concerns raised by CRLA, the County has included Programs 11 and 23 and to address safety concerns in farmworker and transitional housing and Program 22 to provide rehabilitation assistance, when feasible.

In its 2019 Annual Report, the DFEH reported that it did not receive any housing complaints from residents of Imperial County. As part of the Fair Housing Assistance Program (FHAP), DFEH dual-files fair housing cases with HUD's Region IX FHEO, which is able to identify the specific jurisdiction from which a complaint originates. According to HUD's Region IX FHEO, one fair housing discrimination case was filed with and accepted by HUD from an unincorporated area (Salton City) of Imperial County from January 1, 2013, through March 31, 2021. The case alleged discrimination based on race and color; however, the case was closed after HUD made a finding of no cause. In addition to this case, two inquiries with unknown reasons for the alleged discrimination were sent to HUD to determine their validity. In reviewing these cases, one was closed after the claimant did not respond to HUD's follow up and one was found to not be a valid issue. In contrast to the lack of local cases pursued by DFEH and HUD in Imperial County, the county of Los Angeles had 222 housing-related fair housing complaints filed with DFEH in 2019, 46 complaints in Orange County, 36 in Riverside County, 21 in San Bernardino, and 14 in Ventura County. As in all jurisdictions, the number of cases reported to local, state, and federal fair housing organizations may not capture the full extent of discrimination issues as some individuals may choose not to report an incident. However, the number of cases reported elsewhere in the SCAG region indicates that either there are fewer fair housing cases that exist in Imperial County compared to other counties, or that residents are not reporting issues they are experiencing.

CRLA and DFEH were unable to provide specific location information for cases either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the County was unable to conduct a complete spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the county. Program 20 has been included to work with fair housing enforcement organizations and agencies to track issues and identify patterns in the county.

Sites Inventory

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. The California Tax Credit Allocation Committee (TCAC) and HCD prepared opportunity maps that identify resource areas. Areas of high or highest resource have increased access to public services, educational and employment opportunities, medical services, and other daily services (e.g., grocery, pharmacy). Figures A-1 through A-10 included in this sites inventory analysis present the percentage of projected units by income category and overall County land that fall into each category of the following indicators to assess how the sites inventory will affirmatively further fair housing: opportunity areas, predominant population, low- to moderate-income population, female-headed households, population with a disability, jobs proximity, educational score, environmental conditions, overcrowding, and overpayment for both renters and homeowners.

Potential Effect on Patterns of Integration and Segregation

Figure B-1 shows the distribution of resource categorization throughout the County, as defined by TCAC/HCD. The sites identified to accommodate the lower-income housing need are located in several unincorporated communities where there is demand and a need for more affordable housing, including the communities of Heber and Salton City and in the McCabe Ranch II Specific Plan adjacent to the City of Brawley. While many areas in unincorporated Imperial County where communities are located are considered low resource on the TCAC/HCD Opportunity Map, the County has noted extensive demand both from residents seeking to build on their property and developers seeking to build larger housing projects. In the Salton Sea area, there is a high rate of poverty and more limited access to jobs and services, but also regular requests to the County from home and property owners to build additional housing in this area. The community of Heber has been designated as a moderate resource area that provides local job opportunities and other services for residents. The McCabe Ranch II Specific Plan is located in a high resource area within close proximity of jobs, retail, and other services in the City of Brawley. Additionally, development of lower-income units in a specific plan development facilitates integration of lower-, moderate-, and above moderate-income units and provides access to the same resources develops as part of the specific plan, including open space, service, and job opportunities. The sites identified in Table A-29 and A-29A have the potential to provide additional affordable housing options for existing residents to move into more suitable housing if needed or new residents to secure housing. While the sites in the Salton Sea area and Heber have all been identified for lower-income housing, they expand housing mobility opportunity for residents. Many existing residents in the Salton Sea area face chronic overpayment due a shortage of affordable housing, an issue that will be alleviated by planning for new low-income units.

Figure A-1and Table A-26 contain breakdowns of anticipated realistic capacity of sites and affordability levels in each resource area. While all above moderate-income units are anticipated in moderate and high/highest resource, areas, the integration of moderate-income units in low-resource areas will promote mixed-income communities and the inclusion of low-income units in moderate, high, and highest resource areas will facilitate housing mobility opportunities for these households. The construction of lower-income units in low resource areas will aid in reducing displacement risk for households in these communities. Additionally, the County has included Program 9 to encourage the construction of ADUs in high resource areas to further promote housing mobility opportunities

FIGURE A-1
UNITS AND COUNTY ACREAGE BY TCAC RESOURCE AREA CATEGORY

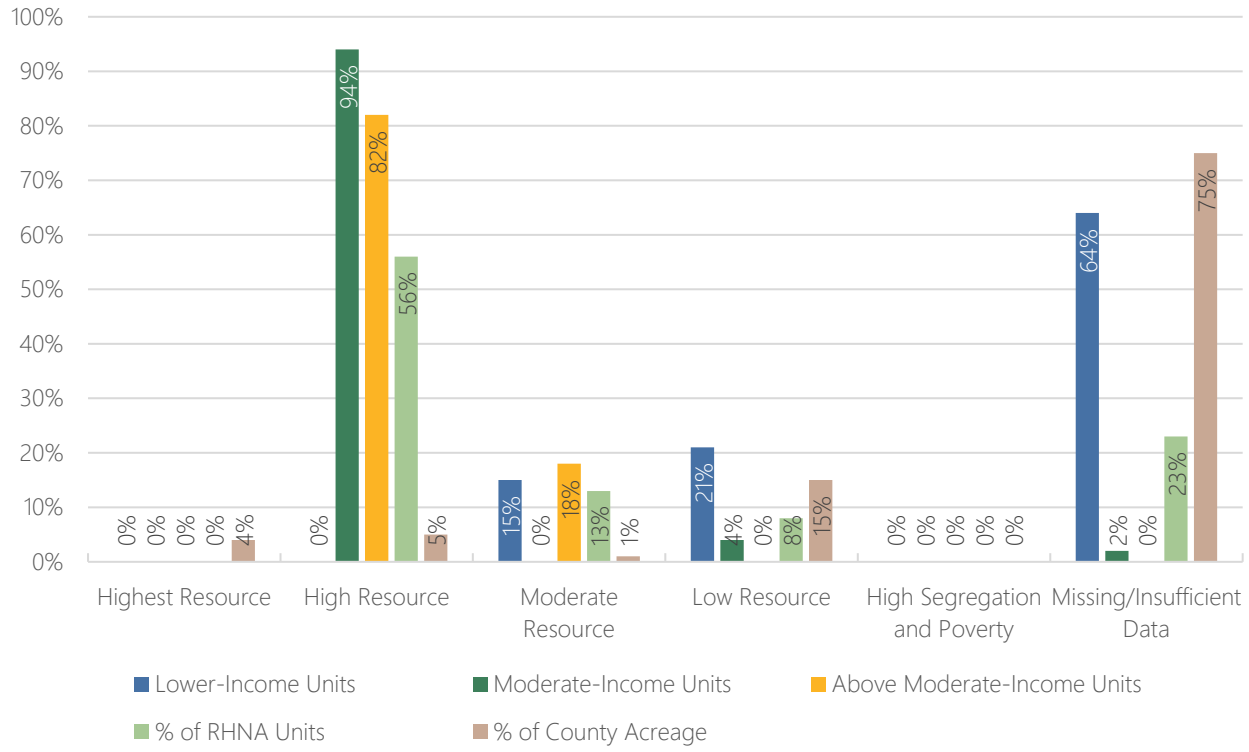


TABLE A-26A
UNITS BY TCAC RESOURCE AREA CATEGORY

Resource Designation	Income Category			Total RHNA
	Lower	Moderate	Above Moderate	
Highest Resource	0	0	0	0
High Resource	0	1,562	2,812	4,374
Moderate Resource	414	0	633	1,047
Low Resource	578	75	0	653
High Segregation and Poverty	0	0	0	0
Missing/Insufficient Data	1,739	31	0	1,770
Total	2,731	1,668	3,445	7,844

While additional affordable housing units will alleviate overpayment and thus enable the occupants to save or spend their incomes in other ways, such as a future home purchases or repairs, in the short term there is potential for continued concentration of poverty in the Salton Sea area. However, in order to combat this, the construction of 287 lower-income units in the specific plan will ensure housing mobility opportunities

exist for lower-income households and will alleviate isolation of these households in areas of concentrated poverty. Furthermore, the County has included the following programs for place-based revitalization:

Program 4 – Colonia Master Plan. The County will assess infrastructure in colonias, including Salton Sea, through in-person surveys to prioritize public investment in basic infrastructure.

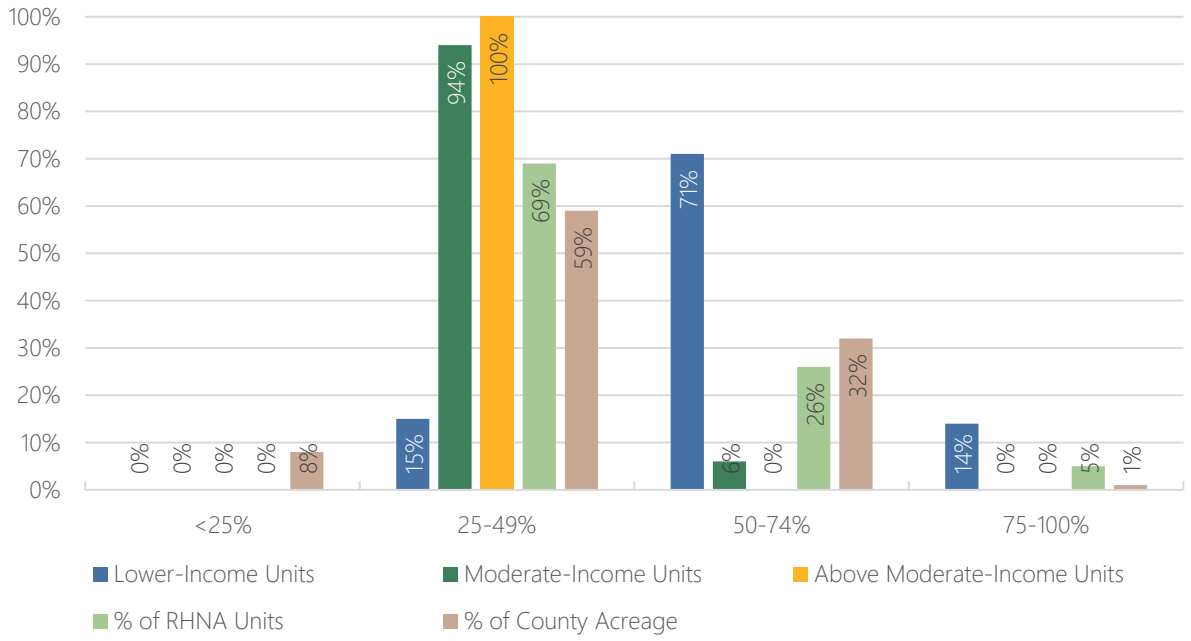
Program 20 – Improve Low Resource Areas Access to Opportunities. Integration includes providing equitable access to resources for all households regardless of income. The County will therefore meet with local agencies and organizations to increase community services and transit in areas of concentrated poverty to facilitate place-based revitalization and aid in mobility through access to employment.

Program 21 – Housing Rehabilitation. The County will seek funding to provide rehabilitation assistance to low-income households.

The sites located in Heber and the McCabe Ranch II Specific Plan are near incorporated jurisdictions and in areas with a lower rate of poverty than is found in Salton Sea. Incorporation of affordable housing will aid in integration by facilitating development of mixed-income community with housing opportunities near amenities for lower-income households. Additionally, the County has also identified the 101 Ranch and Rancho Los Lagos specific plans as suitable sites for moderate and above moderate-income housing. However, the R-3 and High Density Multi-Family zones in these specific plans allow for the appropriate density to develop lower-income units. Upon development, it is likely that affordable units will be incorporated in the specific plans, thus creating mixed-income neighborhoods and housing opportunities for lower-income households near services and amenities that are anticipated to be developed as part of the specific plan processes.

The sites identified to meet the lower- through above moderate-income unit allocation will combat existing patterns of segregation by alleviating cost burden in areas of concentrated poverty and expanding housing mobility opportunities for low-income households and will facilitate integration through development of mixed-income communities and increasing the availability of resources and jobs for all households. As shown Figures A-2 and B-5, approximately 8 percent of the land in Imperial County has less than 25 percent of the population earning low- to moderate-incomes, while 91 percent of land area has 25 to 74 percent of the population in the low- to moderate-income categories. This reflects the lower median incomes in most of the county, outside of incorporated jurisdictions and their immediately adjacent areas. The sites inventory identified in this Housing Element have 71 percent of its lower-income units in areas where 50 to 74 percent of the population is low- to moderate- income, largely in the Salton Sea area, to provide much needed housing for lower-income households at risk of displacement in these areas. By locating most of the lower-income sites in these areas, the County intends to facilitate housing opportunities for the growing populations in these areas that remain lower-income, and existing households that report substandard housing conditions, overcrowding, and overpayment. The sites to meet the moderate- and above moderate-income RHNA are predominantly in areas where 25 to 49 percent of households are low- to moderate-income, encouraging mixed-income communities in these areas.

FIGURE A-2
UNITS AND COUNTY ACREAGE BY PERCENT OF THE POPULATION WITH LOW TO MODERATE INCOMES



As identified in the assessment of fair housing, most of the population of Imperial County is located in the western portion of the County. The eastern portion, with the exception of Winterhaven, is predominantly White, with a population of 1,266 and Winterhaven is predominantly Native American, with a population of 3,052, while the western portion is predominantly Hispanic with the remainder of the County's population. Therefore, while there is a larger number of acres that have a population that is predominantly White (see Table A-26B), a larger portion of the population, and the most populated portion of the County, is predominantly Hispanic. With this in mind, the sites inventory has identified all of its sites in areas that are predominantly Hispanic, corresponding with the areas with the closest proximity to most services and existing housing. Increasing the housing supply in the western portion of Imperial County will provide housing mobility opportunities for residents of all socioeconomic groups and will ensure residents remain proximate to services.

TABLE A-26B
UNITS AND COUNTY ACREAGE BY PREDOMINANT POPULATION

Percent of Dominance	County Acreage			Projected Units by Income Category			RHNA
	Hispanic	White	Native Am.	Lower	Moderate	Above Moderate	
<10% gap	3%	0%	1%	0%	0%	0%	0%
10-50% gap	35%	0%	0%	85%	100%	82%	87%
>50% gap	8%	53%	0%	15%	0%	18%	13%
Total	100%			100%	100%	100%	100%

On approximately 21 percent of the land area in Imperial County, 20 to 39 percent of households are female-headed, single-parent households with children (see Figures A-3). As identified, this group is not large in Imperial County, but does appear to be concentrated in specific areas (see Figure B-6), and this population typically requires more affordable, multi-bedroom units due to family size paired with a single-source income. In order to displacement risk for these households, 21 percent of lower-income units have been identified on sites in areas with this rate of female-headed households. However, in order to assist in reducing the existing concentrations of these households, encourage access to mixed-income communities and areas of higher opportunities, and provide housing mobility opportunities, the County has identified 29 percent of units in areas with lower concentrations of female-headed households. Similarly, while most moderate- and above moderate-income units have been identified in areas with a lower rate of female headed households, additional opportunities have been identified in areas of concentration.

FIGURE A-3
UNITS AND COUNTY ACREAGE BY FEMALE HEADED HOUSEHOLDS

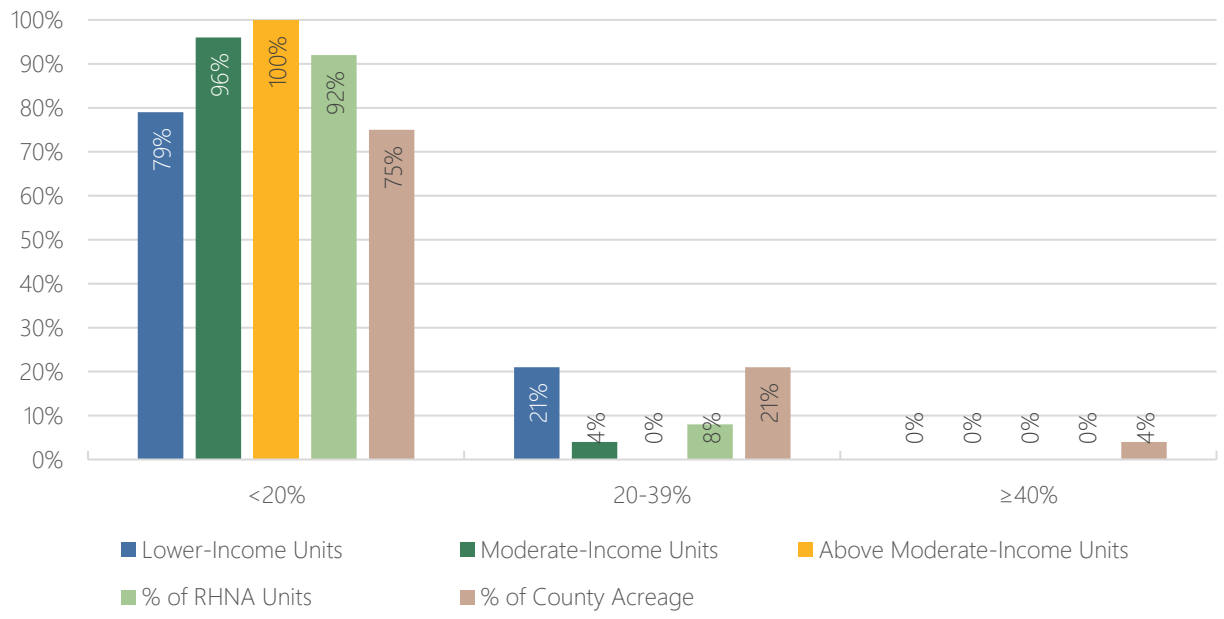
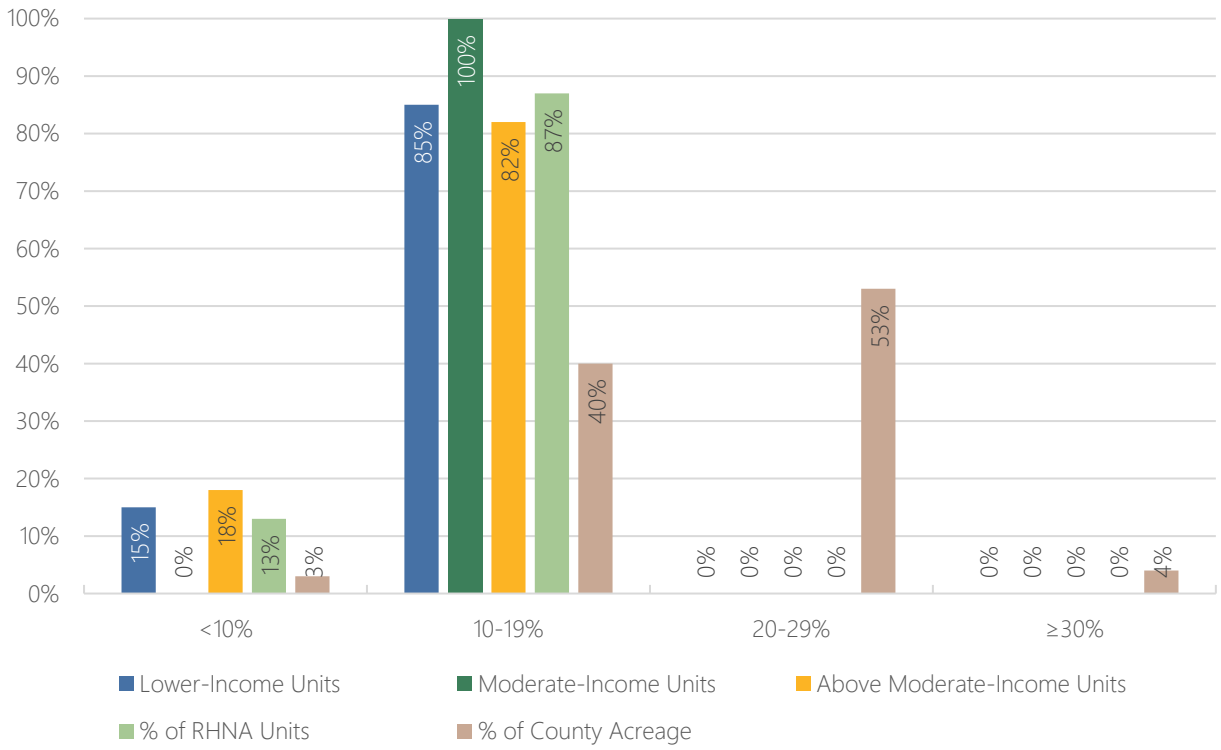


Figure A-4 reports that the 20 percent or more of the population on approximately 59 percent of the land area in Imperial County has a disability. However, as shown in Figure B-7, this land area is largely made up of eastern Imperial County (54 percent of acres in the County), where the 2015-2019 ACS estimates there is a population of 706 persons, where 22 percent (160 persons) have a disability. It is likely that most of this population resides in the Palo Verde area and the census tract is geographically large to account for a small population. The Niland area, which accounts for the remaining 4 percent of land with a disability rate over 20 percent, has a reported population of approximately 35, almost all of whom are seniors. The large majority of Imperial County's population resides in the western portion, west of Niland, where the percent of the population with a disability is less than 20 percent. Figure A-4 demonstrates the distribution of projected units by income category based on the percent of the population with a disability, indicating that

the larger portion of the populated County, which has a disability rate ranging from 10-19 percent, will have the largest share of the RHNA units, with units at all income categories to provide mobility opportunities. Units will also be allocated in areas with lower rates of disability to ensure all residents have access to housing opportunities. While no sites were identified for units in the Niland or eastern Imperial County areas, the County has included Program 4 to conduct assessments of the Colonias to identify strategies and funding to improve housing and living conditions so all persons, regardless of disability status, have access to safe and accessible housing.

FIGURE A-4
UNITS AND COUNTY ACREAGE BY PERCENT OF THE POPULATION WITH A DISABILITY



Potential Effect on Access to Opportunity

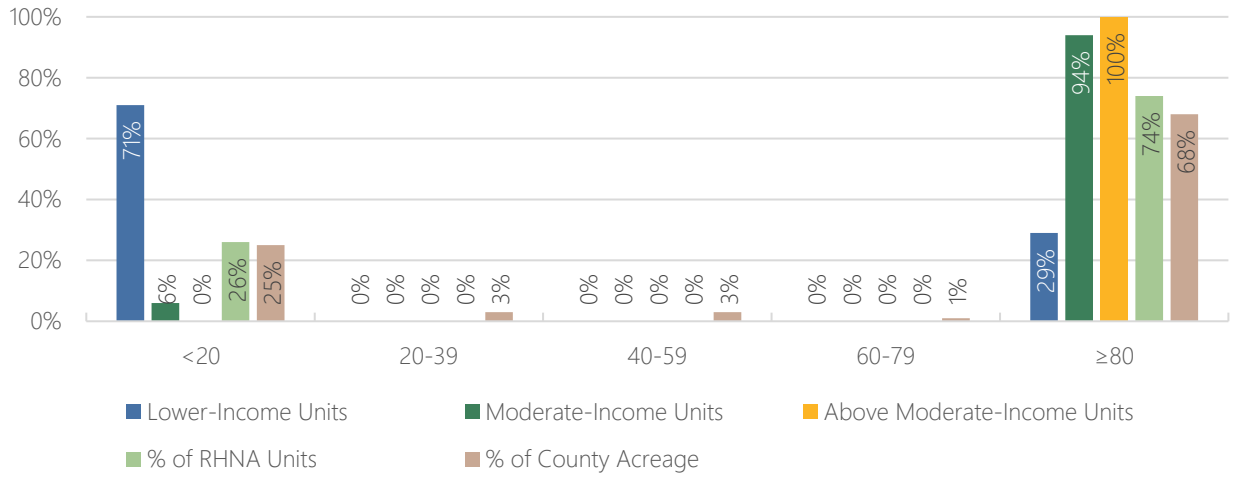
Due to the predominantly rural nature of unincorporated Imperial County, many households in unincorporated areas tend to have relatively longer distances between housing and jobs or schools compared to households in incorporated jurisdictions. However, these unincorporated areas have a significant demand for affordable housing, including multi-family rental opportunities and manufactured home rental or ownership opportunities. Therefore, the sites identified in the Salton Sea area, Heber, and the McCabe Ranch II Specific Plan will meet this demand. Additionally, the sites identified to meet the moderate- and above moderate-income unit allocation are located in the high opportunity area south of the City of Brawley, where new residential units will be in close proximity to jobs, transit, and other services available in the city. Development of specific plans with moderate- and above moderate-income units often

includes, or encourages, development of employment opportunities and services nearby, which will further increase access to opportunity for all households in the vicinity including lower-income units constructed within the McCabe Ranch II Specific Plan.

In order to improve access to resources in low resource areas and encourage economic mobility for all residents, the County has included Program 2 to expand public water and sewer capacity in unincorporated areas, Program 22 to assist with rehabilitation and repair of housing for low-income households, and Program 29 to facilitate lot consolidation for specific plans. Additionally, the County will work with transit agencies to assess demand to expand their routes to connect residents to resources (Program 21). The County's strategies to expand infrastructure and services into underserved unincorporated communities and improve environmental conditions will affirmatively further fair housing by addressing both housing need and improving access to resources.

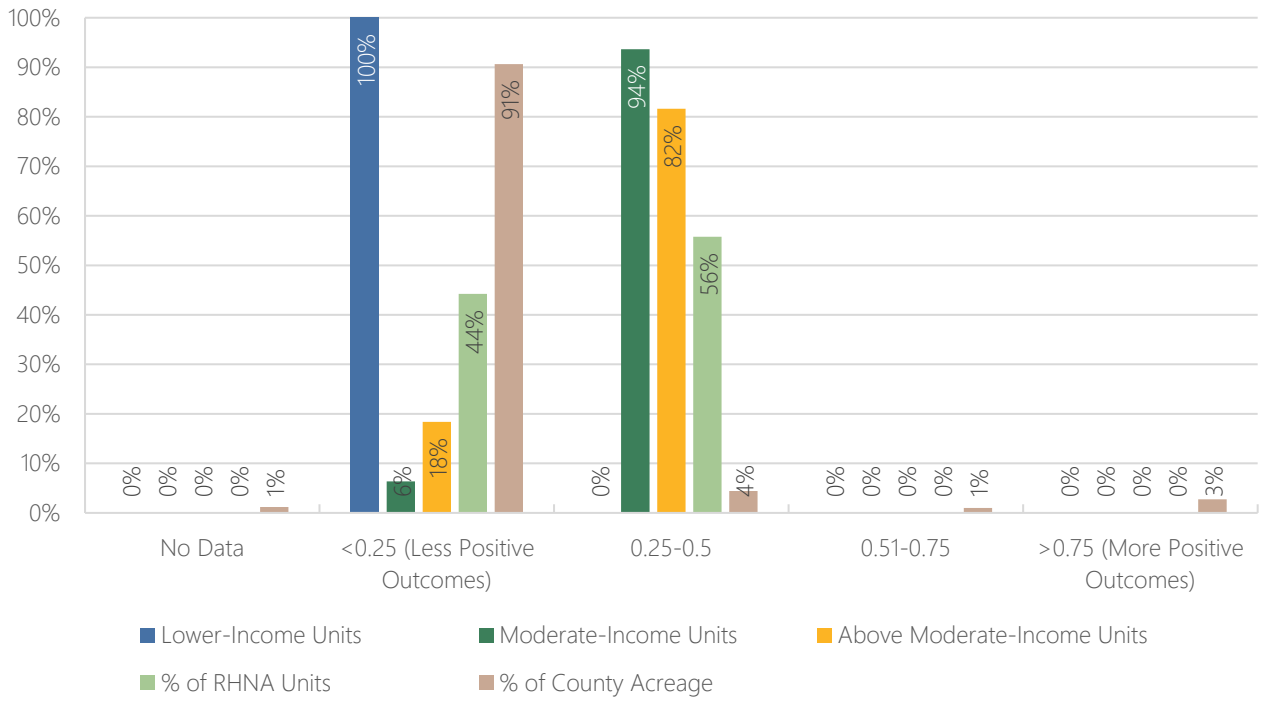
As shown in Figure B-8, the sites identified to meet Imperial County's RHNA are located in areas that are either considered with the closest proximity to employment, or the furthest. While 71 percent of lower-income units to meet the RHNA are anticipated in area with the furthest proximity to jobs (see Figure A-5), most of these are in the Salton City and Salton Sea Beach area, where it is unlikely that there is a drastic difference in job access between communities, as is shown in Figure B-8. However, most large employers are located in incorporated cities and eastern Imperial County, which are not proximate to the western shore of the Salton Sea. The lower-income units identified on the western shore are in response to developer and resident interest in increasing the supply of lower-income units to promote homeownership opportunities, reduce displacement risk due to existing substandard conditions, and alleviate overpayment and overcrowding. The remaining 29 percent of lower-income units, and 74 percent of the overall RHNA, have been identified in areas with close proximity to jobs, thus providing housing mobility opportunities for all income categories in high resource areas that may facilitate further economic opportunities.

FIGURE A-5
UNITS AND COUNTY ACREAGE BY JOB PROXIMITY



As most of Imperial County has a poor expected educational outcome for students (Figure A-6), approximately 44 percent of the County's anticipated units to meet the RHNA are located in areas with an educational score of less than 0.25 out of 1. This portion of the RHNA is made up largely of lower-income units, which are distributed throughout the County to meet demand for more safe, sanitary, and affordable housing. Moderate- and above moderate-income units are identified in the 101 Ranch, Rancho Los Lagos, and McCabe Ranch II specific plan areas, which are partially located in areas with a slightly better education score, falling into the 0.5 to 0.75 range. While the sites inventory concentrates lower-income units in areas with poor educational scores, given the extent of this status, the sites are not expected to further segregate lower-income households from stronger educational opportunities. Instead, providing more stable housing paired with integrating some moderate- and above moderate-income units in low scoring areas may encourage better living conditions that will support families, and thus provide a larger base to provide educational opportunities for.

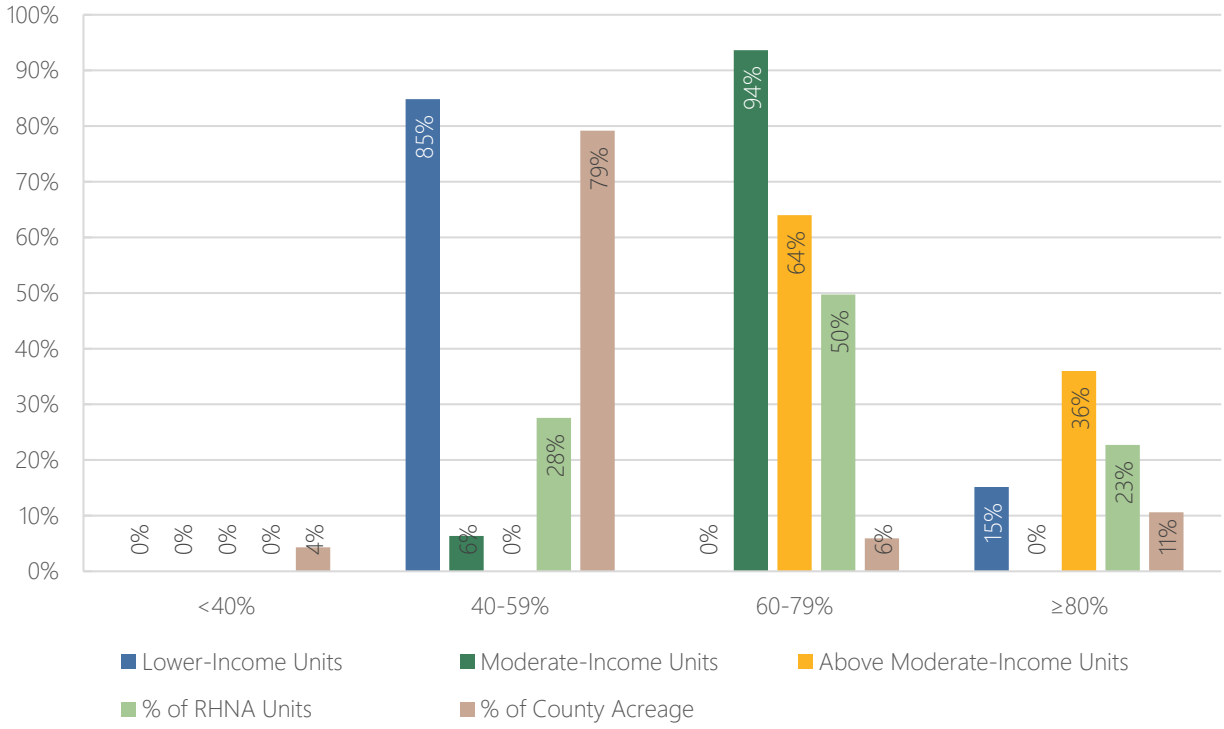
FIGURE A-6
UNITS AND COUNTY ACREAGE BY TCAC EDUCATION SCORE



The sites identified to meet the County's RHNA are anticipated to combat the existing patterns of lower-income areas coinciding with poor environmental conditions, by locating approximately 85 percent of the anticipated lower-income units in areas with more positive environmental scores (Figure A-7). Approximately than 4 percent of the land area in Imperial County has better environmental conditions than a score of 40, indicating that siting lower-income units is areas with scores ranging from 40 to 59 are the strongest available environmental conditions. Moderate-income units are concentrated adjacent to the City of Brawley where environmental scores range from 60 to 79, while above moderate-income units are

distributed across a variety of conditions. Given the poor environmental conditions in Imperial County, identifying sites in a variety of conditions will ensure that there are housing opportunities regardless of socioeconomic status in a range of places to reduce congestion that may worsen negative conditions resulting from traffic or associated impacts. Implementation of Program 21 paired with the distribution of sites will aid in improving environmental conditions for all areas in the County, including where units are projected.

FIGURE A-7
UNITS AND COUNTY ACREAGE BY ENVIRONMENTAL JUSTICE SCORE



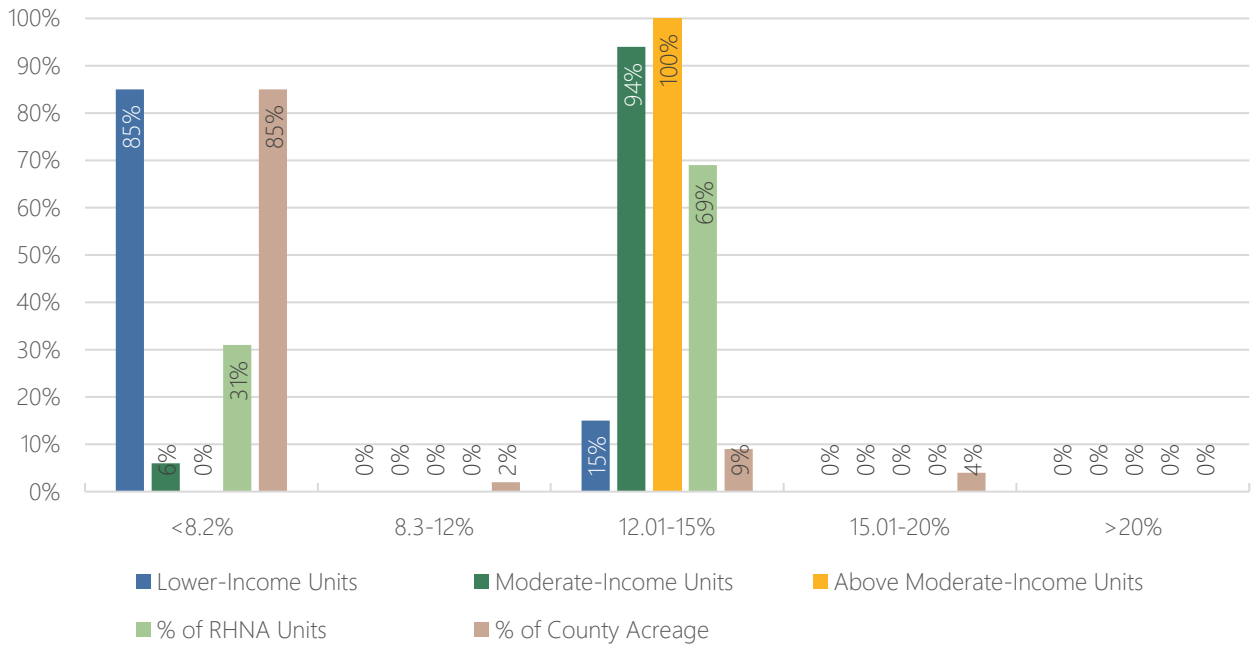
Potential Effect on Displacement Risk

As identified in this assessment, overpayment is a problem in all developed areas of Imperial County, particularly for lower-income households. Overpayment rates among renters are highest in the center of the county, where there tend to be more rental opportunities, and overpayment among owners higher near the Salton Sea and Heber. The County is actively combating this issue by identifying sites for affordable housing in these communities to increase the supply of housing, thus addressing existing demand. The Housing Element sites were selected in an effort to increase the supply of affordable units in areas of concentrated overpayment and address the shortage of vacant units. The housing opportunities presented by these sites will aid in preventing future displacement of low-income residents from their homes and communities while also providing additional units for households that may currently be living in overcrowded situations to afford housing. Additionally, the moderate- and above moderate-income sites

will easy pressure on the housing stock, thus potentially reducing displacement risk and overcrowding for these households as well as more units become available.

In approximately 85 percent of Imperial County, less than 8.2 percent of households are overcrowded (Figure A-8). While just 31 percent of the projected RHNA units are located in this share of the County, the moderate- and above moderate-income units have been identified in specific plans located in areas with higher overcrowding rates. Fifteen percent of lower-income units have also been identified in areas with higher overcrowding rates to provide housing opportunities to reduce displacement risk for lower-income households that may be "doubling up" with other households to afford their existing housing.

FIGURE A-8
UNITS AND COUNTY ACREAGE BY PERCENT OF OVERCROWDED HOUSEHOLDS



As shown in Figure A-9, all projected units, regardless of expected income, are on sites located in areas where 40 to 59 percent of homeowners are cost burdened. This rate of overpayment for homeowners can be found in approximately 50 percent of Imperial County, while there are lower rates of overpayment among renters, but in a larger area of the County (Figure A-10). As stated previously, renter households are concentrated in the center of the county, in or near incorporated jurisdictions, while many unincorporated communities, particularly near the Salton Sea, are largely owner households. Typically, above moderate-income units are unaffordable to cost-burdened households, while lower- and moderate-income housing units can help alleviate overpayment. Sites for new units have been identified across a range of renter overpayments rates and in the largest area of high overpayment for owners with the intent of increasing the supply affordable housing for all income categories, thus reducing risk of displacement due to overpayment.

FIGURE A-9
UNITS AND COUNTY ACREAGE BY PERCENT OF HOMEOWNERS OVERPAYING FOR HOUSING

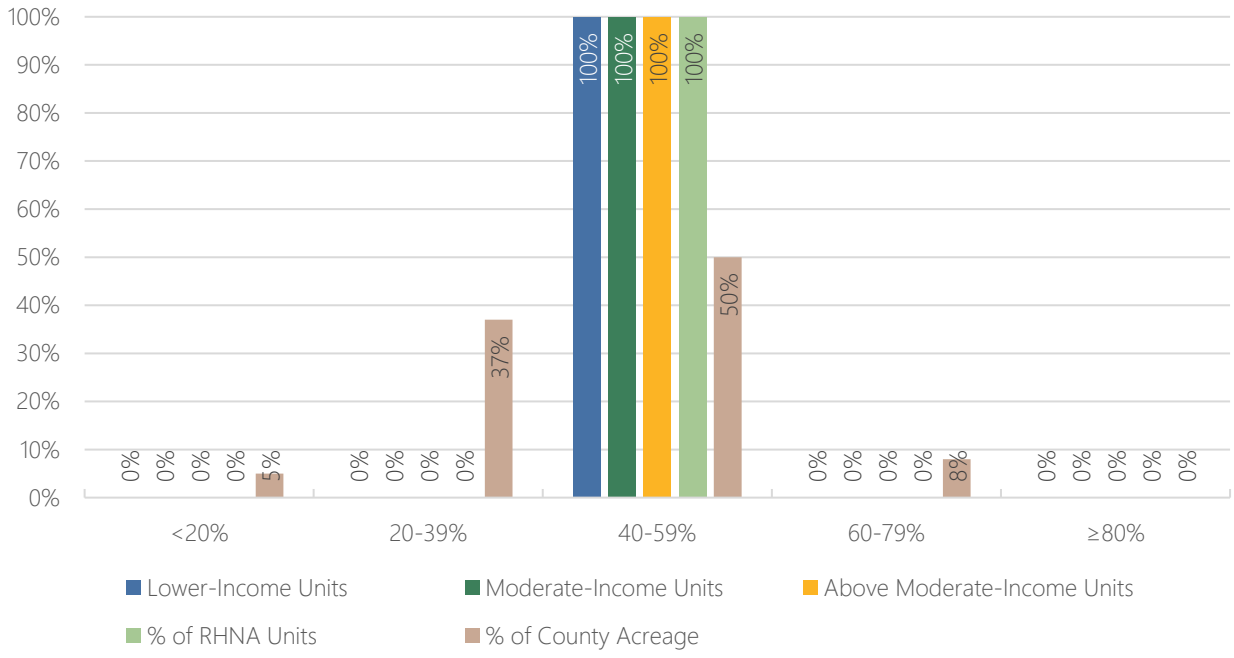
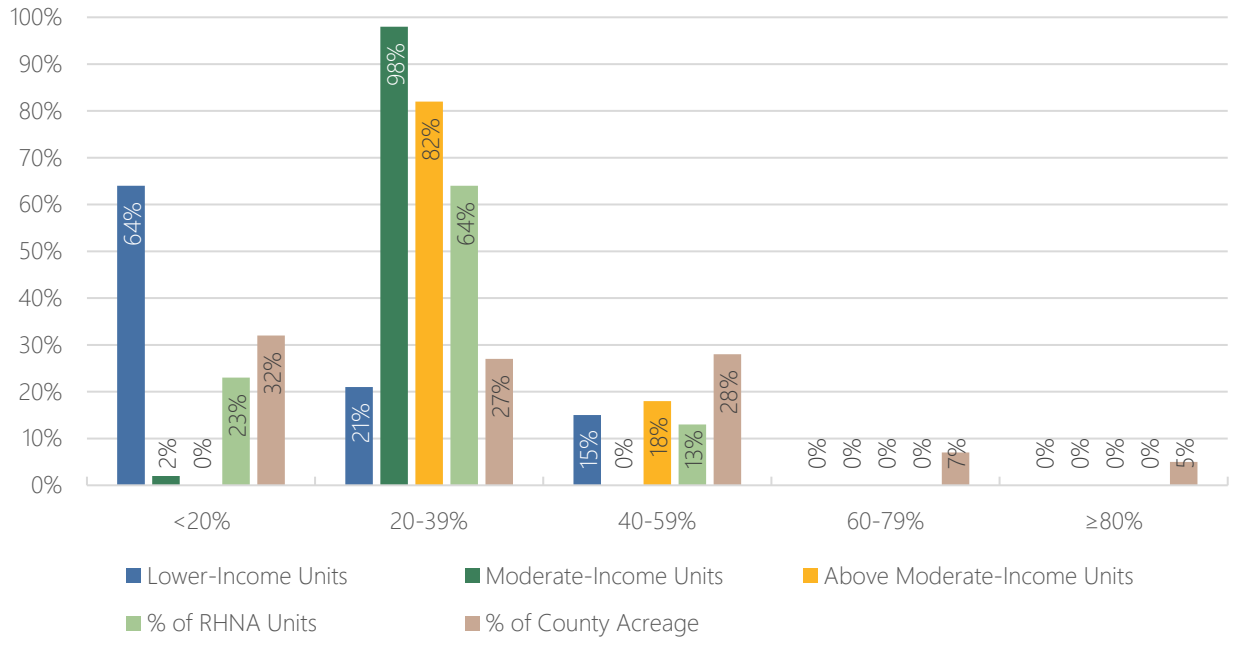


FIGURE A-10
UNITS AND COUNTY ACREAGE BY PERCENT OF RENTERS OVERPAYING FOR HOUSING



Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the County identified factors that contribute to fair housing issues in Imperial County, as shown in Table A-26. While there are several strategies identified to address the fair housing issues, the most pressing barriers are the limited economic mobility and displacement risk, that may prevent lower-income households from securing safe and stable housing. Therefore, the County has identified the factors that contribute to these issues as priorities in combatting fair housing issues and facilitating place-based revitalization in unincorporated Imperial County.

TABLE A-26
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES IN IMPERIAL COUNTY

AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
Displacement of residents due to economic pressures.	Shortage of affordable housing. Cost of repairs and rehabilitation. Dominance of manufactured homes as the affordable option, which does not provide much opportunity for economic mobility.	Integrate affordable housing into Specific Plan developments (Program 3). Assist with acquisition, rehab, and construction of affordable housing (Program 5). Incentivize construction of ADUs (Program 10). Provide technical assistance, streamlining, and incentives to support affordable housing development (Program 14). Allow SROs without a use permit (Program 19). Promote CalWorks in rural areas of the county (Program 20). Provide rehabilitation and weatherization loans for lower-income households (Program 21). Work with affordable housing providers to preserve units (Program 23). Facilitate lot consolidation to support affordable housing developments (Program 27).
Displacement of farmworkers.	Shortage of short-term rental units for migrant worker housing. Shortage of extremely low-income housing.	Provide regulatory incentives to encourage construction of housing for special-needs groups (Program 11).

AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
	Poor conditions in transitional housing options.	Collaborate with agricultural employers to identify opportunities for farmworker housing (Program 12). Conduct a survey of farm worker housing conditions (Program 12). Implement proactive code enforcement for substandard housing units (Program 22).
Access to services.	Limited and infrequent transit routes to unincorporated communities. Lack of schools in communities surrounding the Salton Sea. Size of student body needed to support construction of a school.	Work with service districts to increase capacity (Program 2). Support social service agencies secure funding to provide housing-related services (Program 13). Distribute information on homeless and community assistance programs (Program 15). Ensure residents with disabilities have access to services or referral programs (Program 18). Work with transit agencies to increase mobility and routes to schools during the school year, as needed (Program 20). Promote employment services, community services, and medical services in low-resource areas (Program 20).
Disproportionate access to basic infrastructure (i.e. sidewalks, curbs, etc.).	Lack of investment in colonias. Funding shortages. Rural nature of unincorporated communities. Concentrations of poverty	Provide assistance to water and sewer providers to expand availability and capacity (Program 2). Conduct an infrastructure needs assessment in colonias (Program 4). Improve access to resources in low-resource areas (Program 20).
Displacement of residents due to overcrowding.	Shortage of larger affordable housing units. Low-vacancy rate due to insufficient housing supply.	Identify and address barriers to constructing units with three or more bedrooms (Program 13). Provide technical assistance, streamlining, and incentives to support affordable housing development and expand supply (Program 14).

Areas with limited access to services and education or with poor housing conditions are most likely to experience fair housing issues. Given that these issues are present throughout Imperial County, the County has identified the above as contributing factors and barriers to fair housing and has included implementation strategies throughout the goals, policies, and actions in this Housing Element to further fair housing and address historical patterns of segregation and poverty beyond just the program required to satisfy AB 686 (Program 21).

Housing Resources and Opportunities

Regional Housing Needs

State law (California Government Code Section 65580 et seq.) requires the California Department of Housing and Community Development (HCD) to project statewide housing needs and allocate the anticipated need to each region in the state. For much of Southern California, including Imperial County, HCD provides the regional need to the Southern California Association of Governments (SCAG), which then distributes the Regional Housing Needs Allocation (RHNA) to the cities and counties within the SCAG region. SCAG allocates housing production goals for cities and counties based on their projected share of the region's household growth, the state of the local housing market and vacancies, and the jurisdiction's housing replacement needs.

Imperial County's share of the 2021 to 2029 RHNA planning period is 4,301 units for the unincorporated areas. Refer to Table A-27 for a breakdown of units by income category.

TABLE A-27
UNINCORPORATED IMPERIAL COUNTY REGIONAL HOUSING NEED, 2021-2029

Income Category	2021-2029 RHNA	Percent of Total
Extremely Low Income*	601	14.0%
Very Low Income	602	14.0%
Low Income	596	13.9%
Moderate Income	580	13.4%
Above Moderate Income	1,922	44.7%
Total	4,301	100.0%

Source: SCAG 6th Cycle Final RHNA Allocation Plan, March 2021
**Note: It is assumed that the extremely low-income unit need is 50 percent of the very low-income allocation.*

Local governments can employ a variety of strategies to meet RHNA housing production goals, as provided in California Government Code Section 65583(c)(1), including vacant land zoned for residential uses, development of accessory dwelling units, and the potential for redevelopment of underutilized sites. As described in the Availability of Land section that follows, Imperial County has vacant land zoned for residential development at a range of densities to exceed the RHNA for all income categories.

Availability of Land

State Housing Element law emphasizes the importance of adequate land for housing and requires that each Housing Element "…identify adequate sites… to facilitate and encourage the development of a variety of housing types for all income levels…" (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate

services and infrastructure, such as water, wastewater, and roads. The sites listed in Table A-28 are currently available and will allow for the development of a variety of housing types that will potentially meet the needs of all income groups allocated by SCAG for the 2021-2029 planning period.

Sites Identified in Previous Housing Element

Pursuant to California Government Code Section 65583.2(c)), a non-vacant site identified in the previous planning period and a vacant site that has been included in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the site is subject to a program in the Housing Element requiring rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Table A-28 indicates (denoted in bold and italics) whether inventoried sites are subject to California Government Code Section 65583.2(c). Most sites included in the inventory for lower-income housing have been identified in previous Housing Elements. While the sites included in the lower-income inventory already allow housing by-right, the Housing Element includes Policy 1.2 to ensure housing developments in which at least 20 percent of the units are affordable to lower-income households will be allowed by-right.

Sites Appropriate for Lower-Income Housing

Housing element law requires jurisdictions to provide a requisite analysis showing that zones identified for lower-income households are sufficient to encourage such development. The law provides two options for preparing the analysis: (1) describe market demand and trends, financial feasibility, and recent development experience; or (2) utilize default density standards deemed adequate to meet the appropriate zoning test. According to state law (California Government Code Section 65583.2(c)(3)(B)), the default density standard for Imperial County is 20 dwelling units per acre. Sites 1 through 7 listed in Table A-28 were identified to meet the County's lower-income RHNA.

Large Sites

The County is relying on several specific plans with sites larger than 10 acres where parcels have not yet been subdivided. In an effort to determine that sites larger than 10 acres are appropriate to meet the moderate income RHNA, the County relied on the Heber Meadows project and projects from the neighboring County of Riverside.

As mentioned later in this section, Heber Meadows is located in the community of Heber and is a 16.2-acre project that is planned for 320 units affordable to lower income households.

Riverside County has recently worked with affordable housing providers to approve two 100 percent affordable projects on sites larger than 10 acres, Oasis Villa, a farm worker housing project, and a senior housing project in Vista Santa Rosa, both processed in early 2021. Oasis Villa includes 160 multi-family affordable housing units in the community of Oasis. The housing units will be 100 percent affordable to

low-income households with units ranging from one- to four-bedrooms with the intent to serve local farmworkers and their families. The project includes a commercial component consisting of a medical clinic, a market, childcare facility, and retail spaces as well as open space for recreation and retention. The 26-acre site will have approximately 3.57 acres of commercial uses and 19.06 acres of residential and open space uses. The average density of the multi-family development is approximately 8.4 dwelling units per acre. Vista Santa Rosa is a mixed-use project in the Vista Santa Rosa community. This project is proposing the consolidation of 12 parcels for a gross acreage of 26.81 for the project that will include commercial uses, and a multi-unit senior housing assisted living facility. The assisted living facility will have 128 total dwelling units, comprised of one- and two-bedroom units, for a density of approximately 9 dwelling units per acre.

These three project examples demonstrate that affordable housing is feasible on large sites. Based on these recent projects, the County assumes larger sites are appropriate to meet a portion of the moderate income RHNA, and although not assumed in the sites analysis, these sites could provide housing for lower income households.

Realistic Capacity

Imperial County has vacant land zoned for residential development at a range of densities up to 29 units per acre, with a total capacity for 13,524 units of which 3,412 units are in higher-density zones (20 to 29 units per acre), well in excess of the lower-income RHNA of 1,799.

All sites allow for at least the required default density for Imperial County of 20 dwelling units per acre. The County considered and evaluated the implementation of its current development standards and on-site improvement requirements (e.g., setbacks, building height, parking, and open space requirements) as well as, looked at a recent proposed project (see Table A-29) to determine a realistic unit capacity for all vacant sites outside of specific plans. Specific Plans relied on 40 percent of the approved unit counts for each plan, assuming that only a portion of each plan is likely to develop during the 2021-2029 planning period.

Realistic capacity for vacant residential sites was determined by multiplying the number of acres by the maximum density for the site; a factor of 80 percent of the maximum density was applied to account for site and regulatory constraints that may limit each site from being built to 100-percent density.

The County considered the following projects to establish that an 80% realistic capacity was appropriate:

- Chelsea Investment Corporation (planned, affordable) – 76 percent realistic capacity
- Heber Del Sol Apartments (under construction, affordable) – 104 percent realistic capacity
- Desert Sunrise Units (approved pending building permit, market-rate) – 85 percent realistic capacity

Table A-28 provides a list of the available sites that are located within existing townsites in the unincorporated county, specifically the areas of Salton City and Salton Sea Beach. Table A-29 provides a listing of the approved Specific Plans in the county. Based on the sites included in both tables, the County has sufficient sites to meet the RHNA.

Development interest in Salton City and Salton Sea Beach has recently increased. This area is within close proximity of the cities of Coachella, Indio, Palm Desert and Palm Springs where the cost of living is very high. With the commute time being less than an hour, both Salton City and Salton Sea Beach are becoming a place of interest. County staff receives about 7 to 10 calls per week regarding development in this area, both from owners of recently purchased property or residents interested in purchasing property. A majority of calls are in reference to R-1 zoned parcels but about one-third of the calls pertain to R-3 zoned parcels. While there has yet to be new development in this area, the interest is there. The lots in and around this area have water and sewer connections available, along with electrical connection. There is an interest in innovative housing for this area including tiny homes as well as trailer homes and manufactured homes. There is also new commercial development including a family dollar store that was recently built in this area and the Torres Martinez Casino is along highway 86 which is near these cities. Based off of this data, the County believes that these sites are appropriate to accommodate a portion of the County's RHNA.

TABLE A-28
VACANT LAND INVENTORY

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
1	001-793-009	R-2	West Shores/Salton City Urban Area	Vista Del Mar	1.38	10	13	10	None	Yes	Vacant	Moderate
2	007-301-005	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.70	10	6	4	None	Yes	Vacant	Moderate
3	001-792-011	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.64	10	6	4	None	Yes	Vacant	Moderate
4	001-723-004	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.58	10	5	4	None	Yes	Vacant	Moderate
5	001-774-003	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.55	10	5	4	None	Yes	Vacant	Moderate
6	001-723-003	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.51	10	5	4	None	Yes	Vacant	Moderate
Vacant R-2 Subtotal					4.35		40	30				
7	054-645-001	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	1193 Dogwood Road, Heber	2.6	29	75	52	None	Yes	Vacant	Lower
8	054-645-002	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	South of the intersection of Correll Road and S Dogwood Road, Heber	2.7	29	78	54	None	Yes	Vacant	Lower
9	054-645-003	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	South of the intersection of Correll Road and S Dogwood Road, Heber	1.1	29	31	21	None	Yes	Vacant	Lower
10	001-850-047	R-3	West Shores/Salton City Urban Area	Salton Sea Beach	8.59	29	249	199	None	Yes	Vacant	Lower
11	014-222-001	R-3	West Shores/Salton City Urban Area	Salton City	2.30	29	66	52	None	Yes	Vacant	Lower
12	014-222-002	R-3	West Shores/Salton City Urban Area	Salton City	2.27	29	65	52	None	Yes	Vacant	Lower
13	014-260-007	R-3	West Shores/Salton City Urban Area	Salton City	2.23	29	64	51	None	Yes	Vacant	Lower
14	014-294-002	R-3	West Shores/Salton City Urban Area	Salton City	2.04	29	59	47	None	Yes	Vacant	Lower
15	014-293-001	R-3	West Shores/Salton City Urban Area	Salton City	1.87	29	54	43	None	Yes	Vacant	Lower
16	014-291-003	R-3	West Shores/Salton City Urban Area	Salton City	1.86	29	53	42	None	Yes	Vacant	Lower
17	014-291-008	R-3	West Shores/Salton City Urban Area	Salton City	1.85	29	53	42	None	Yes	Vacant	Lower
18	014-260-002	R-3	West Shores/Salton City Urban Area	Salton City	1.81	29	52	41	None	Yes	Vacant	Lower
19	014-293-005	R-3	West Shores/Salton City Urban Area	Salton City	1.74	29	50	40	None	Yes	Vacant	Lower
20	014-221-001	R-3	West Shores/Salton City Urban Area	Salton City	1.73	29	50	40	None	Yes	Vacant	Lower
21	014-292-006	R-3	West Shores/Salton City Urban Area	Salton City	1.70	29	49	39	None	Yes	Vacant	Lower
22	014-292-005	R-3	West Shores/Salton City Urban Area	Salton City	1.70	29	49	39	None	Yes	Vacant	Lower
23	014-291-001	R-3	West Shores/Salton City Urban Area	Salton City	1.69	29	49	39	None	Yes	Vacant	Lower
24	014-260-003	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower
25	014-221-003	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
26	014-221-002	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower
27	014-293-002	R-3	West Shores/Salton City Urban Area	Salton City	1.63	29	47	37	None	Yes	Vacant	Lower
28	014-221-004	R-3	West Shores/Salton City Urban Area	Salton City	1.62	29	47	37	None	Yes	Vacant	Lower
29	014-294-001	R-3	West Shores/Salton City Urban Area	Salton City	1.56	29	45	36	None	Yes	Vacant	Lower
30	014-291-004	R-3	West Shores/Salton City Urban Area	Salton City	1.48	29	42	33	None	Yes	Vacant	Lower
31	014-260-006	R-3	West Shores/Salton City Urban Area	Salton City	1.47	29	42	33	None	Yes	Vacant	Lower
32	014-293-004	R-3	West Shores/Salton City Urban Area	Salton City	1.43	29	41	32	None	Yes	Vacant	Lower
33	014-292-004	R-3	West Shores/Salton City Urban Area	Salton City	1.38	29	40	32	None	Yes	Vacant	Lower
34	014-292-002	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
35	014-292-003	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
36	014-292-001	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
37	014-293-003	R-3	West Shores/Salton City Urban Area	Salton City	1.36	29	39	31	None	Yes	Vacant	Lower
38	014-294-003	R-3	West Shores/Salton City Urban Area	Salton City	1.34	29	38	30	None	Yes	Vacant	Lower
39	014-291-007	R-3	West Shores/Salton City Urban Area	Salton City	1.32	29	38	30	None	Yes	Vacant	Lower
40	014-291-006	R-3	West Shores/Salton City Urban Area	Salton City	1.31	29	37	29	None	Yes	Vacant	Lower
41	014-260-009	R-3	West Shores/Salton City Urban Area	Salton City	1.30	29	37	29	None	Yes	Vacant	Lower
42	014-260-001	R-3	West Shores/Salton City Urban Area	Salton City	1.30	29	37	29	None	Yes	Vacant	Lower
43	014-260-008	R-3	West Shores/Salton City Urban Area	Salton City	1.27	29	36	28	None	Yes	Vacant	Lower
44	014-291-002	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
45	014-291-005	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
46	014-260-004	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
47	014-260-005	R-3	West Shores/Salton City Urban Area	Salton City	1.12	29	32	25	None	Yes	Vacant	Lower
48	010-082-004	R-3	West Shores/Salton City Urban Area	Salton City	1.07	29	30	24	None	Yes	Vacant	Lower
49	015-521-010	R-3	West Shores/Salton City Urban Area	Salton City	0.97	29	28	22	None	Yes	Vacant	Lower
50	014-223-003	R-3	West Shores/Salton City Urban Area	Salton City	0.93	29	26	20	None	Yes	Vacant	Lower
51	014-223-002	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
52	014-223-004	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
53	014-223-001	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
54	010-190-007	R-3	West Shores/Salton City Urban Area	Salton City	0.87	29	25	20	None	Yes	Vacant	Lower
55	017-712-001	R-3	West Shores/Salton City Urban Area	Salton City	0.79	29	22	17	None	Yes	Vacant	Lower
56	016-051-010	R-3	West Shores/Salton City Urban Area	Salton City	0.78	29	22	17	None	Yes	Vacant	Lower
57	017-712-004	R-3	West Shores/Salton City Urban Area	Salton City	0.76	29	22	17	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
58	017-712-002	R-3	West Shores/Salton City Urban Area	Salton City	0.73	29	21	16	None	Yes	Vacant	Lower
59	010-090-016	R-3	West Shores/Salton City Urban Area	Salton City	0.72	29	20	16	None	Yes	Vacant	Lower
60	010-181-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
61	017-712-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
62	014-332-004	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
63	010-082-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
64	014-332-005	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
65	017-722-002	R-3	West Shores/Salton City Urban Area	Salton City	0.70	29	20	16	None	Yes	Vacant	Lower
66	015-570-013	R-3	West Shores/Salton City Urban Area	Salton City	0.70	29	20	16	None	Yes	Vacant	Lower
67	014-311-009	R-3	West Shores/Salton City Urban Area	Salton City	0.68	29	19	15	None	Yes	Vacant	Lower
68	017-722-001	R-3	West Shores/Salton City Urban Area	Salton City	0.67	29	19	15	None	Yes	Vacant	Lower
69	014-283-001	R-3	West Shores/Salton City Urban Area	Salton City	0.65	29	18	14	None	Yes	Vacant	Lower
70	010-190-006	R-3	West Shores/Salton City Urban Area	Salton City	0.64	29	18	14	None	Yes	Vacant	Lower
71	014-283-004	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
72	010-082-005	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
73	014-103-011	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
74	010-181-002	R-3	West Shores/Salton City Urban Area	Salton City	0.62	29	18	14	None	Yes	Vacant	Lower
75	014-332-001	R-3	West Shores/Salton City Urban Area	Salton City	0.61	29	17	13	None	Yes	Vacant	Lower
76	014-332-002	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
77	014-311-002	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
78	015-570-009	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
79	014-332-006	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
80	015-372-016	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
81	010-082-009	R-3	West Shores/Salton City Urban Area	Salton City	0.58	29	16	12	None	Yes	Vacant	Lower
82	014-311-026	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
83	014-311-007	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
84	014-311-008	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
85	015-570-014	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
86	014-311-006	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
87	015-534-008	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
88	015-382-008	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
89	010-090-017	R-3	West Shores/Salton City Urban Area	Salton City	0.55	29	15	12	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
90	015-521-014	R-3	West Shores/Salton City Urban Area	Salton City	0.54	29	15	12	None	Yes	Vacant	Lower
91	017-610-030	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
92	014-332-003	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
93	015-372-011	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
94	014-193-016	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
95	016-452-027	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
96	014-311-003	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
97	010-090-018	R-3	West Shores/Salton City Urban Area	Salton City	0.52	29	15	12	None	Yes	Vacant	Lower
98	015-431-001	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
99	014-103-009	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
100	015-521-015	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
101	010-181-004	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
102	010-100-011	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
Vacant R-3 Subtotal					102.89		2938	2317				
103	014-051-003	R-4	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Moderate
104	001-930-035	R-4	West Shores/Salton City Urban Area	Salton Sea Beach	8.28	7	57	45	None	Yes	Vacant	Moderate
Vacant R-4 Subtotal					9.65		96	76				

Source: Imperial County, September 2021

TABLE A-29
SPECIFIC PLAN INVENTORY

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
105	040-190-001; 040-190-002; 040-190-004; 040-200-001	R-1	101 Ranch Specific Plan	North of Carey Road and east of Imperial Valley Pioneers Expressway, south of Brawley	514	5	2,570	825	Mitigation for impacts to biological resources identified in Specific Plan EIR	Planned	Vacant agricultural land	Above Moderate
		R-2			651.1	8	5,209	1,462				Above Moderate
		R-3			138.2	20	2,764	508				Moderate
		CCMU			13.1	20	262	47				Moderate
Subtotal 101 Ranch					1316.40		10,805	28,41				
106	040-013-03; 040-013-04; 040-013-07	Single-Family, Medium Density	Rancho Los Lagos Specific Plan Area	North of Schartz Road, West of Dowood Road, east of Highway 86, south of City of Brawley	209	n/a	n/a	600	Mitigation for impacts to biological resources identified in Specific Plan EIR	Planned	Vacant	Moderate
		Single-Family, Low Density			268	n/a	n/a	525				Above Moderate
		High Density Multi-Family			63	24	1,512	406				Moderate
Subtotal Rancho Los Lagos					540.00		1,512	1,532				
107	054-130-042; 054-130-072; 054-130-076; 054-130-077; 054-130-078; 054-130-079	High Density Multi-Family	McCabe Ranch II Specific Plan	South of McCabe Road, West of Dogwood Road, East and North of State Highway 86, Heber	26.7	22	587	235	Mitigation for impacts to vegetation/habitats, sensitive habitats, and wildlife species identified in Specific Plan EIR	Planned	Vacant	Lower
		Gated Community High Density Multi-Family			8.6	24	206	52				Lower
		Traditional Lot, Single-Family			83.9	5	420	168				Above Moderate
		Small Lot, Single-Family			31.6	7	221	88				Above Moderate
		Flex Lot, Single-Family			68.6	9	617	247				Above Moderate
		Estate Lots, Single-Family			22.6	n/a	45	18				Above Moderate
		Mini-Estate Lots, Single-Family			25.9	n/a	112	45				Above Moderate
		Low Density, Single-Family			33.4	n/a	167	67				Above Moderate
Subtotal McCabe Ranch II					301.30		2,375	920				

Source: Imperial County, October 2021

Proposed Project

In March 2021, Chelsea Investment Corporation submitted to the County a Tentative Tract Map for a 320-unit affordable housing project on 16.2 acres located in Heber at the southwest corner of the intersection of E. Correll Road and Pitzer Road (Table A-29). Chelsea Investment Corporation has confirmed their intent to construct and signalize the intersection, construct a sidewalk to a nearby elementary school, and other improvements to facilitate an accessible environment for residents. While the final funding source for this project has not yet been reported, Chelsea Investment is an affordable housing provider that has previously used funding through the California Tax Credit Association and HCD funding for two previous affordable projects in Heber and it is anticipated that similar funding will be used to secure affordability of the Heber Meadows project.

TABLE A-30
PENDING PROJECT – CHELSEA INVESTMENT CORPORATION, HEBER MEADOWS

Site #	APN	Zoning	General Plan Land Use	Acreage	Allowed Density	Proposed Units
108	054-604-016	R-3	Urban Area	16.2	29	320

Accessory Dwelling Unit Potential

The County considers Accessory Dwelling Units (ADUs) appropriate for low-income households as either a primary residence or as farmworker housing. Currently, there is no available data for ADU rental rates in the County. Therefore, the County relied on median monthly rental rates for one-bedroom units identified in Table A-22 as a proxy for ADU rental rates. The average monthly rent for a one-bedroom unit in Imperial County varies significantly depending on its location within the county. Low-income households can afford between $979 (one-person) and $1,398 (four-person) in monthly housing costs without being cost burdened. Comparing the rental rates with the affordability of low-income households shows that ADUs are appropriate to credit toward the County's lower-income RHNA.

Between 2018 and 2020, the County permitted six ADUs, an average of two per year. The County projects that the annual average will double during the 2021-2029 planning period as a result of increased efforts to promote and encourage construction of ADUs. Therefore, the County projects that 32 ADUs will be constructed over the course of the planning period. According to SCAG's Regional Accessory Dwelling Unit Affordability Analysis released in December 2020, approximately 15.0 percent of second units in Imperial County are affordable to extremely low-income households, 7.7 percent are affordable to very low-income households, 34.8 percent are affordable to low-income households, 34.8 percent are affordable to moderate-income households, and 7.7 percent are affordable to above moderate-income households. Using this analysis of affordability, the County projects that 58 percent of ADUs, or 18 units, will be affordable to lower-income households, 35 percent, or 11 units, will be affordable to moderate income households, and 8 percent or, or 2 units, will be affordable to above moderate-income households.

Manufactured Home Potential

> As discussed in Chapter 3, Housing Needs Assessment, of the Housing Element, Homes Direct reported that in April 2020, the most recent available data, new manufactured housing ranged in price from $64,500 to $120,300, on average.

Non-governmental constraints that may influence the affordability of a new manufactured home include land costs, transportation costs, and foundation costs as well ability to secure financing and rescale affordability. As identified in Table A-35, the average price per acre in unincorporated Imperial County varies significantly depending on location; however, most areas have low land costs and do not add a significant barrier to putting an affordable manufactured housing unit on the land. Land costs range from $1,979 in Palo Verde to $86,733 in Desert Shores, though 5 out of 10 communities cost less than $10,000 per acre. In these communities, it is unlikely that land cost is a barrier to development of mobile homes and mobile home parks. In other communities, land costs may present a barrier to this type of housing. The County analyzed the cost of purchasing, installation, and fees of a new manufactured home and estimated that the cost totals approximately $135,000 per unit. The following costs were estimated for a new 24-foot by 44-foot manufactured home:

Item	Cost
New Home	$86,000
Installation	$6,500
Foundation & Skirting	$6,800
Steps	$2,000
A/C	$6,500
Awning 11 ft. x 40 ft.	$3,520
Transportation	$3,800
Fees & Permits	$5,750
Driveways	$2,560
Fence & Gates	$7,600
Landscape	$4,000
Total	$135,030

Source: Imperial County, September 2021

Most manufactured housing developed in the county serves cost-constrained families, providing an affordable alternative to traditional stick-built development. Table A-21 shows that a four-person, extremely low-income household can afford a maximum sales price of $163,536, a very low-income household can afford a maximum sales price of $218,152, and a low-income household can afford a maximum sales price of $348,918, meaning that manufactured housing is affordable to extremely low- to low-income households.

Between 2014 and 2020, there was an average of 20 mobile/manufactured homes added to the County's housing stock per year. Projecting these 20 units over the RHNA period (eight years) gives the County a projected capacity of 160 manufactured/mobile homes.

Specific Plans

Much of the planned residential development in unincorporated Imperial County is located within Specific Plan areas, including 101 Ranch, and Rancho Los Lagos. Adopted Specific Plans have undergone environmental review and identify how adequate infrastructure, including water and sewer, will be provided. The Specific Plan descriptions herein provide an overview of the general character of each plan area and highlight development standards unique to the plan. Unless otherwise noted, standards align with those in the County's General Plan.

The General Plan anticipates and encourages the use of specific plans when designing new projects, especially those that will include large areas of land. The specific plan process allows for a more comprehensive planning process for the target area and can be a mechanism to allow for flexibility in the design and location of future land uses. Based on the development horizons for these specific plans, the County has assumed that only 40 percent of these projects would be likely to develop during the 2021-2029 planning period. This assumption is reflected in the unit counts in Table A-29.

101 Ranch Specific Plan

The 101 Ranch Specific Plan, adopted in 2012, encompasses 1,894 acres of land located between the cities of Brawley and Imperial. The plan provides for 7,481 residential units ranging from entry-level duplex homes on 4,000-square-foot lots to "move-up" homes on 8,000-square-foot lots. It is anticipated that the 101 Ranch Specific Plan will be developed generally by community beginning with the West Community, then the East Community, and finally the Central Community. About half of the high-density units (666 units) are within the East Community and while the project is market driven, it is assumed that these units could be developed within the 2021-2029 planning period. The breakdown of units in each community are listed in Table A-31.

Units in the Low-Density Residential (R-1) and Medium-Density Residential (R-2) zones will likely accommodate above moderate-income households, while other housing types, such as the garden courts and townhomes in the Multifamily/Attached Residential (R-3) areas and Community/Commercial Mixed Use (CCMU allowing up to 20 units per acre (1,387 units), will be developed on smaller lots (as small as 2,500 square feet) and will be appropriate for low-income households. The CCMU zone allows for a mix of community-serving retail commercial, office, and employment with multifamily/attached residential (R-3) or allows for multifamily/attached residential (R-3) with no commercial component. The 1,387unit assumption takes into account development beyond residential units and assumes that residential in the CCMU zone will account for 45 percent of the development. The County has assumed that the 101 Ranch Specific Plan will accommodate the moderate- and above moderate- income RHNA.

Note that the R-1, R-2, and R-3 designations in this Specific Plan differ from those of the County's General Plan.

Development standards in the 101 Ranch Specific Plan allow for a variety of lot configurations with required and optional development standards. Options vary by zone but typically allow trade-offs between setbacks

and parking requirements. 101 Ranch is expected to be developed in three stages, beginning with the West Community, then the East Community, and finally the Central Community. Refer to Table A-31 for a summary of the size, density, and planned units in each of the three communities.

Water, wastewater, and other services for the 101 Ranch area will be financed and constructed by the developer prior to residential construction.

TABLE A-31
101 RANCH SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Area/Residential Lot Size	Maximum Density (units per acre)	Acres	Units[1]	Applicable Specific Plan Zone
West Community		665.7	3,229	
8,000 S.F. min	3.7	30.8	113	R-1
7,200 S.F. min.	3.8	67.3	257	
6,500 S.F. min.	4.1	85.5	347	
6,000 S.F. min.	4.6	120.3	551	
5,500 S.F. min.	4.7	114.4	540	R-2
5,000 S.F. min.	5.4	132.7	717	
4,500 S.F. min.	5.8	56.3	329	
4,000 S.F. min.	6.4	58.4	375	
Central Community		211.3	1,479	
7,200 S.F. min.	3.6	18.3	66	R-1
6,000 S.F. min.	4.8	16.3	79	
5,500 S.F. min.	4.9	20.6	101	R-2
5,000 S.F. min.	5.5	52.8	288	
4,500 S.F. min.	6.2	19.8	122	
4,000 S.F. min.	7.4	13.7	102	
Condominiums	9.4	45.2	425	R-3
Town Homes	12.0	24.6	296	
East Community[2]		426.3	2,278	
8,000 S.F. min	3.6	21.2	76	R-1
7,200 S.F. min.	4.0	38.8	156	
6,500 S.F. min.	4.2	36.5	154	
6,000 S.F. min.	4.5	58.4	263	
5,500 S.F. min.	4.9	89.5	441	R-2
5,000 S.F. min.	5.5	70.1	387	

Area/Residential Lot Size	Maximum Density (units per acre)	Acres	Units[1]	Applicable Specific Plan Zone
4,500 S.F. min.	5.8	43.4	253	
4,000 S.F. min.	6.8	26.2	179	
Condominiums	8.7	42.2	369	R-3/CCMU
Total		1,303.3–1,316.4	6,986–7,104	

Source: 101 Ranch Specific Plan, 2011

1. Units planned are from 45% to 80% of the maximum density.

Rancho Los Lagos Specific Plan

The Rancho Los Lagos Specific Plan, adopted in 2012, provides for 3,830 housing units in a 1,076-acre mixed-use, walkable community. The plan establishes four community areas: conventional residential, active adult residential, golf course, and business park. Development timing will be based on market conditions, and each area may be developed over several phases (phases A1 – A3 and B1 – B3), with associated infrastructure and community facilities provided concurrently. Phase A1 includes 24 acres of multifamily and mixed-use land along with single family and park space. Phase A2 includes single and multifamily development along with a school and additional open space.

High Density Multifamily areas can accommodate 1,016 units at densities between 12 and 24 units per acre and are appropriate to meet the County's lower income RHNA based on allowable density. Medium-Density Single-Family areas can accommodate 1,501 units in duplexes and detached single-family dwellings and cluster single-family dwellings (shared driveway) on lots under 5,000 square feet. Low-Density Single-Family areas can accommodate 1,313 single-family residences on lots over 5,000 square feet. The County has assumed that the 101 Ranch Specific Plan will accommodate the moderate- and above moderate- income RHNA.

The Rancho Los Lagos Plan includes provisions for 939 units in an "active adult" community that would be age restricted to residents 55 years and older. Homes at low and medium densities are planned to meet the needs of seniors at a wide range of income levels. The area would be served by a homeowner's association recreation complex as well as by community-wide parks, lakes, and a golf course.

Refer to Table A-32 for a summary of land and unit potential by residential development type.

According to the Rancho Los Lagos Environmental Impact Report, development in the Rancho Los Lagos area will connect to planned water and wastewater services facilities to be provided in the Keystone County Service Area. In the event that construction at Rancho Los Lagos commences before the service facilities are completed, the Keystone County Service Area will provide a temporary water treatment plant.

TABLE A-32
RANCHO LOS LAGOS SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Land Use	Gross Acres	Units	Gross Density (units per acre)
Low Density Residential			
7,200 S.F.	54.7	207	3.8
6,000 S.F.	62.0	293	4.7
5,000 S.F.	74.6	384	5.1
Medium Density Residential			
4,000 S.F.	67.7	426	6.3
3,500 S.F.	38.4	321	8.4
4-unit Cluster (on 12,650 S.F. 4-lot pad)	25.6	244	9.5
High Density Residential (Multi-Family)			
Condominium	19.8	356	18.0
Multi-Family Mixed Use	15.0	360	24.0
Townhomes	27.7	300	10.8
Active Adult or Gated Community Residential			
6,000 S.F. (detached)	28.2	147	5.2
5,000 S.F. (detached)	49.1	282	5.7
3,800 S.F. (attached or detached)	76.8	510	6.6

Source: Rancho Los Lagos Specific Plan, 2011

McCabe Ranch II Specific Plan

The McCabe Ranch II Specific Plan, adopted in 2010, describes development planned for a site of approximately 457 acres located near the townsite of Heber in the unincorporated county, south of the City of El Centro. The plan includes four main components: a conventional residential community, a gated residential community, a business park/commercial area, and a village commercial area. In addition, the plan calls for uses including parks, schools, and public facilities.

The plan provides for a maximum of 2,300 housing units. Housing options include attached and detached single-family homes on a variety of lot sizes, as well as multifamily units at a density of up to 24 units per acre. It is assumed that the High-Density Multifamily (718 units) is appropriate to accommodate the County's lower income RHNA based on the assumed density. Refer to Table A-33 for a summary of the unit types, densities, and total units in the specific plan area.

There are no specific timing or phasing requirements, construction will depend on market conditions and demand. The plan allows for flexibility in the specific type of housing constructed and mix of commercial uses to allow for changing demand.

Development in the McCabe Ranch II area will connect to the Heber Public Utility District. The Specific Plan anticipates upgrades and expansions to the Heber Public Utility District systems to accommodate the new development. McCabe Ranch II developers will contribute to infrastructure expansion financing. The County has included program 28 to help facilitate the development of large lots

TABLE A-33
MCCABE RANCH II SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Residential Type	Max. Density (units per acre)	Acres	Units
Traditional Lot, Single-Family	5	83.9	420
Small Lot, Single-Family	7	31.6	221
Flex Lot, Single-Family	9	68.6	617
High-Density Multifamily	22	26.7	587
Gated Community			
Estate Lots, Single-Family	n/a (1 SF dwelling per site, min. lot size 0.5 acre)	22.6	45
Mini-Estate Lots, Single-Family	n/a (1 SF dwelling per site, min. lot size 10,000 sf)	25.9	112
Low-Density, Single-Family	n/a (1 SF dwelling per site, min. lot size 6,000 sf)	33.4	167
High-Density Multifamily	24	8.6	131
Total		293.6	2,300

Source: McCabe Ranch II Specific Plan, June 2010

Sites Analysis Summary

Based on the land analysis, the County has sufficient land to accommodate 6th Cycle RHNA, shown in Table A-34. Moderate- and above moderate-income unit allocations are met through specific plans, and projected ADUs. Lower income unit allocations are met through vacant sites, specific plans, the Chelsea Investment Corporation projected project and through projected ADUs and manufactured homes.

As shown in Table A-34, the County has a surplus of 1,430 lower-income units, 1,099 moderate-income units, and 1,525 above moderate-income units. The available capacity exceeds the County's RHNA.

TABLE A-34
2021-2029 RHNA ANALYSIS

Income Group	2021-2029 RHNA	Specific Plan Capacity	Vacant Site Capacity	Pending Project	Projected ADUs	Projected Manufactured Homes	Unit Surplus
Very Low	1,203	287	2,444	320	18	160	1,430
Low	596						
Moderate	580	1,562	106	-	11		1,099
Above Moderate	1,922	3,445		-	2		1,525
Total	4,301	5,293	2,550	320	32	160	4,054

Source: SCAG 6th Cycle Final RHNA Allocation Plan, March 2021; Imperial County Planning & Development Services, 2021

Environmental Constraints and Infrastructure

Though fault lines and floodplains are present in the Imperial Valley, the ample availability of land in the county allowed for the identification of potential sites that are not subject to environmental factors that would present a constraint to housing development. All sites listed in the inventory are within the Heber Public Utilities District (HPUD) or have identified adequate infrastructure improvements and financing as part of a Specific Plan. Additionally, the County has included Program 2 to assist with Infrastructure Availability and Coordination —to work with community service districts to identify and overcome constraints to providing water and sewer service for housing, prioritizing improvements for lower-income housing and in low-resource areas to further place-based revitalization efforts.

Housing Constraints

The availability, cost, and quality of housing are influenced by factors including economic and housing market conditions, the availability of financing, governmental practices and processes, and public and private attitudes toward housing for local residents. This chapter addresses potential governmental, non-governmental, and infrastructure constraints to affordable housing development, as well as opportunities for energy conservation.

Non-Governmental Constraints

Construction Costs

Construction costs vary widely based on the type of development, with multifamily housing generally less expensive to construct than single-family homes on a per-unit basis. Variables such as unit size and the number and quality of amenities, such as fireplaces, swimming pools, and interior fixtures create wide cost variations within each construction type.

In addition to construction costs, the price of land is one of the primary components of housing development costs. Land costs vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (e.g., steep slopes, soil stability, seismic hazards, or flooding) can impact the cost of land. Other costs may stem from professional services such as land surveying and engineering, soils engineering/analysis, site design, landscape and architectural design, and permit processing.

According to construction cost data provided by the Craftsman Book Company, a wood-framed single-story four-cornered home in Imperial County is estimated to cost approximately $262,787 to build, excluding the cost of buying land. This cost estimate is based on a 2,000-square-foot house of good quality construction including a two-car garage and forced air heating and cooling. Table A-35 summarizes the projected construction costs.

If labor or material costs increase, the cost of construction in Imperial County could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. The County will do its part in reducing development processing times and providing a more streamlined review process by continuing to implement Program 28 described in the Goals, Policies, and Programs section.

TABLE A-35
CONSTRUCTION COSTS

Item Name	Materials	Labor	Equipment	Total
Direct Job Costs (e.g., foundation, plumbing, materials)	$112,203	$96,980	$5,109	$214,292
Indirect Job Costs (e.g., insurance, plans and specifications)	$16,844	$1,650	-	$18,494
Contractor Markup	$30,001	-	-	$30,001
Total Cost	$159,048	$98,630	$5,109	$262,787

Source: Building-Cost.net, accessed February 2021

Land Costs

Land costs are one of the major components of housing development costs. Land prices vary to such an extent that it is difficult to give average prices, even within small geographic regions. Factors affecting the costs of land include overall availability within a given subregion; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations, such as views, terrain, and vegetation; the proximity to urban areas; and parcel size. Generally, more remote areas have less expensive land available and in larger tracts. Smaller and more expensive parcels are closer to urbanized areas.

Land costs in the unincorporated county typically reflect their location within the county, availability or presence of infrastructure, and are similar to incorporated jurisdictions nearby. Table A-36 shows average land costs in unincorporated communities of Imperial County where land is listed for sale as of May 2021. Residential land prices of all sites surveyed ranged from $792 per acre for a site in Palo Verde to $207,143 per acre for a site in Salton City.

TABLE A-36
LAND COSTS, UNINCORPORATED COUNTY

Community	Average Price per Acre	Number of Sites Surveyed
Bombay Beach	$20,818	4
Desert Shores	$86,733	5
Heber	$19,990	1
Niland	$2,642	12
Ocotillo	$1,256	2
Palo Verde	$1,979	5
Salton City	$59,894	53
Salton Sea Beach	$6,231	3
Seeley	$65,127	3
Winterhaven	$6,179	7

Source: Landwatch.com, May 2021

Availability of Financing

The cost of borrowing money to finance the construction of housing or to purchase a unit affects the availability and affordability of housing in Imperial County. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render a housing project that could have been developed at lower interest rates infeasible. When interest rates decline, sales increase. The reverse has been true when interest rates increase. The recent economic downturn had a significant impact on the housing market and housing financing. In the years following the downturn, financing has become more difficult to obtain, especially for low- and middle-income households. This could be a constraint to homeownership for lower-income families. At the same time, post-economic downturn interest rates have been historically low. These historically low rates could provide opportunity for low- and middle-income families to experience homeownership.

The fixed interest rate mortgage remains the preferred type of loan, especially during the periods of low, stable interest rates that are currently occurring. Table A-37 illustrates interest rates as of February 2021. The table presents both the interest rate and the annual percentage rate (APR) for different types of home loans. The interest rate is the percentage of an amount of money that is paid for its use for a specified time, and the APR is the yearly percentage rate that expresses the total finance charge on a loan over its entire term. The APR includes the interest rate, fees, points, and mortgage insurance and is therefore a more complete measure of a loan's cost than the interest rate alone. However, the loan's interest rate, not its APR, is used to calculate the monthly principal and interest payment.

TABLE A-37
INTEREST RATES

Loan Type	Interest	APR
30-year fixed	3.00%	3.09%
30-year fixed Veterans Administration	2.75%	3.00%
20-year fixed	2.75%	2.88%
15-year fixed	2.25%	2.43%
7/6-Month Adjustable-Rate Mortgage (ARM)	2.13%	2.57%
5/6-Month ARM	2.00%	2.58%
Jumbo		
30-year fixed	3.00%	3.05%
15-year fixed	2.75%	2.87%
7/6-month ARM	2.50%	2.68%
10/6-month ARM	2.63%	2.73%

Source: wellsfargo.com, February 2021

The availability of financing also 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 by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with government assistance.

Table A-38 summarizes the disposition of loan applications submitted to financial institutions for home purchase, refinance, and home improvement loans in Imperial County in 2019. Included is information on loan applications that were approved and originated, approved but not accepted by the applicant, denied, withdrawn by the applicant, or incomplete. An originated application is one that is approved by the lender and accepted by the applicant.

TABLE A-38
HOME MORTGAGE ORIGINATIONS, EL CENTRO MSA, 2019

Disposition	Home Purchase				Refinance		Home Improvement	
	Government-Backed		Conventional					
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Approved, Originated	713	77.7%	921	70.6%	1,320	52.4%	54	26.1%
Approved, Not Accepted	20	2.2%	49	3.8%	65	2.6%	3	1.4%
Denied	81	8.8%	124	9.5%	420	16.7%	105	50.7%
Withdrawn	85	9.3%	175	13.4%	503	20.0%	31	15.0%
Incomplete	19	2.1%	36	2.8%	211	8.4%	14	6.8%
Total	918	100.0%	1,305	100.0%	2,519	100.0%	207	100.0%

Source: Home Mortgage Disclosure Act (HMDA) data, accessed April 2021

Energy Conservation

Although the County of Imperial implements various housing programs, affordable housing is not less expensive to live in merely because the development costs are minimized. Ongoing expenses related to housing are also a factor of affordability.

The cost of housing includes not only the rent, but also utility costs. Higher utility expenses reduce affordability. Building "affordable" homes is not the same as making homes affordable to live in. Cheaply built homes invite callbacks, complaints, and discomfort and waste energy. Therefore, additional first costs to improve energy efficiency do not make housing less affordable in the long run. Energy efficiency in affordable housing, more than any other building sector, makes a critical impact on the lives of tenants. According to United States Department of Housing and Urban Development (HUD), "utility bills burden the poor and can cause homelessness." The County supports energy conservation in new and existing housing through application of California residential building standards that establish energy performance criteria for new residential buildings (Title 24 of the California Administrative Code) and through appropriate land use policies and development standards that reduce energy consumption.

Southern California Edison and Imperial Irrigation District offer a variety of energy conservation services and participate in energy assistance programs for lower-income households. Southern California Edison offers several programs for energy efficiency, including the Home Energy Efficiency Rebate (HEER) Program, Comprehensive Manufactured Homes Program (CMHP), and the Multifamily Energy Efficiency Rebate Program. Imperial Irrigation District offers a refrigerator recycling program and an Energy Rewards Program. A full list of the energy conservation and assistance programs available to residents of Imperial County can be found in Table A-39.

TABLE A-39
ENERGY CONSERVATION PROGRAMS

Program	Provider	Summary
Energy Rewards Program	Imperial Irrigation District	Offers rebates for energy efficiency measures to increase efficiency while reducing cost. Rebates can be applied to energy-efficient refrigerators, clothes washers, shade screens, attic insulation, and more.
Refrigerator Recycling Program	Imperial Irrigation District	Pays participants $50 to have Imperial Irrigation District haul away old refrigerators and freezers for responsible disposal.
Home Energy Efficiency Rebate (HEER) Program	Southern California Edison	Offers rebates on heat pump water heaters, power stations, smart thermostats, and electric vehicles to improve energy efficiency.
Residential Energy Efficiency Loan (REEL) Program	Southern California Edison	Provides financing to owners and tenants of single-family and other low-density homes for energy-efficiency upgrades
Energy Savings Assistance (ESA)	Southern California Edison	Covers the costs of purchasing and installing energy-efficient appliances for low-income customers.
Comprehensive Manufactured Homes Program (CMHP)	Southern California Edison and Synergy Companies	Provides energy-efficient products, such as light fixtures and low-flow showerheads for mobile and manufactured homeowners.
Multifamily Energy Efficiency Rebate Program	Southern California Edison	Provides rebates to increase multifamily complexes energy efficiency and is available to senior housing, single-room occupancy units, condominiums, mobile home parks, and single-family Homeowner Association (HOA) communities in addition to multifamily complexes with two or more dwellings.
Affordable Multifamily Financing (AMF) Program	Southern California Edison	Offers financing for energy-efficiency upgrades for deed-restricted multifamily properties.

Source: Southern California Edison 2021; Imperial Irrigation District 2021

Infrastructure

Dry Utilities

Electricity is available for most areas of the county through the Imperial Irrigation District or Southern California Edison.

Dry utilities, including electricity and telephone service, are available to all populated areas within the county. The extension of power and gas to service new residential development has not been identified as a constraint. Service providers are as follows:

- Electricity: Imperial Irrigation District, Southern California Edison
- Telephone: AT&T
- Internet: AT&T, Spectrum, Time Warner

Water and Wastewater

In the unincorporated areas of the county, water and sewer services are generally limited to parcels within or immediately adjacent to established communities or incorporated cities. Modest residential development can usually be accommodated, but larger subdivisions generally require costly facility expansions. Financing for expansions is available from state and federal sources but may take several years to obtain. Those communities that have recently been expanded, including Heber, have the most potential for short-term growth.

Residential developments that are built adjacent to cities and plan to "plug into" their service systems are subject to available capacities and Local Agency Formation Commission (LAFCo) regulations. Although local cities are under no obligation to provide services, in the past they have typically allowed the connection via an extension of city services or assisted in the annexation of the proposed development. Both approaches are subject to LAFCo regulations.

Outside established communities, where urban services cannot be extended or an individual water well cannot be provided, water is available through a canal system for uses other than drinking and through commercial drinking water companies. Sewage is treated by individual septic systems. Larger developments may require state-approved sewer or water treatment systems or may have to connect to special districts. All sites identified to meet the County's Regional Housing Needs Allocation (RHNA) are located in either the Heber Public Utilities District (HPUD) or have planned infrastructure expansions through the Specific Plan development process.

HPUD owns, operates, and maintains a wastewater treatment system that serves the Heber community and surrounding areas. The treatment plant was rehabilitated and expanded in 2013 to increase capacity to 1.2 million gallons per day but is currently operating at 50 percent capacity with approximately 1,600 active connections resulting in an average daily flow of 5 million gallons. As a result, there are approximately 1,600 available sewer service connections. HPUD also operates a water treatment system to provide water to the

community of Heber as well as the McCabe Cove and Magnolia Gate communities within the City of El Centro's Sphere of Influence. The water treatment plant was expanded in 2017 to increase capacity to 4 million gallons per day and distributes water to 1,632 service connections, using approximately 50 percent of its current capacity. There are approximately 1,600 water service connections available. HPUD has sufficient capacity to accommodate the water and wastewater needs of projected development during the planning period within its service area.

The 101 Ranch and Rancho Los Lagos specific plans each address infrastructure improvements and expansions needed to meet the demand of final build-out of each project. The McCabe Ranch II Specific Plan and Heber sites are located within HPUD's service area and demand for these units will be met by the capacity expansions that were completed in 2013 (wastewater) and 2017 (water); the specific plan includes adding water lines as an early stage of development. The 101 Rancho and Rancho Los Lagos specific plans each commit to construction adequate public facilities and infrastructure to serve the project and meet public need prior to each phase of development. The sites identified in Salton City and Vista Del Mar are served by the Coachella Valley Water District (CVWD) for water; sewer service for Salton City is provided by Salton Community Services District and Vista Del Mar primarily by private septic systems. In 2015 the County estimated, based on past trends, that approximately 75 to 100 new private septic systems would be constructed annually to support new development. Based on conversation with the Salton Sea Community Service District, there are no capacity issues and there is sufficient capacity to serve anticipated construction of 2500 units in Salton Sea. Additionally, developers have reported interest to the County to fund expansion of necessary water infrastructure to support residential projects in Salton City to meet the demand for housing. (Refer to program 2).

Table A-40 lists the water districts that provide service to the townsites in the unincorporated areas of Imperial County. In accordance with Senate Bill (SB) 1087, the adopted Housing Element will be forwarded to all water and sewer providers serving Imperial County. Developers of the 101 Ranch and Rancho Los Lagos specific plans will finance and construct additional infrastructure capacity as needed for water and sewer service prior to construction of residential units. These expansions are done as needed to meet new demand, paid for by developer fees for regional improvements that both specific plans commit to participating in.

TABLE A-40
IMPERIAL COUNTY WATER DISTRICTS (UNINCORPORATED COUNTY)

Townsite	Water District
Bombay Beach	Coachella Valley Water District
Desert Shores	Coachella Valley Water District
Heber	Heber Public Utilities District
Niland	Golden State Water Company
Ocotillo/Nomirage	Coyote Valley Mutual Water Company, Ocotillo Valley Mutual Water Company
Palo Verde	Palo Verde County Water District

Townsite	Water District
Salton City	Coachella Valley Water District
Salton Sea Beach	Coachella Valley Water District
Seeley	Seeley County Water District
Winterhaven	Winterhaven County Water District

Source: Imperial County Planning Department 2021

Governmental Constraints

Local policies and regulations can impact the price and availability of housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and various other issues can constrain the development and improvement of housing.

Land Use Controls

The Imperial County General Plan establishes policies that guide residential development. These policies, along with zoning regulations, control the amount and distribution of land allocated for a wide variety of uses in the county. Housing supply and costs are affected by the amount of land designated for residential use, the density at which residential development is permitted, and the standards that govern the character of development. Refer to Table A-41 for a description of Imperial County General Plan land use classifications that allow for residential development. Most opportunities for new residential development are located in areas in the Urban Area and Specific Plan classifications.

Policies set forth in the General Plan are implemented by the development regulations in Title 9, the Land Use Ordinance for Imperial County, as well as in adopted Specific Plans.

TABLE A-41
GENERAL PLAN LAND USE DESIGNATIONS

Designation	Intent
Agriculture	Preserve lands for agricultural production and related industries, including aquaculture, ranging from light to heavy agriculture. Where this designation is applied, agriculture shall be promoted as the principal and dominant use to which all others shall be subordinate. Allows very low-density residential uses with not more than one single family dwelling per 40 acres or per legal parcel.
Community Area	Land uses associated with the unincorporated communities of Hot Mineral Spa/Bombay Beach, Ocotillo/Nomirage, and Palo Verde. Primarily low-density accessory dwelling units and retirement dwellings and recreational services. Higher densities may be allowed pursuant to an approved Master Plan for the overall Community Area where adequate public infrastructure exists.

Designation	Intent
Industry	Heavy manufacturing land uses located away from conflicting existing or planned land uses. Residential land uses are limited to one single-family dwelling unit if appurtenant to a permitted industrial or commercial use and occupied by a caretaker, custodian, or night watchman with a conditional-use permit.
Recreation/ Open Space	The maximum allowed residential density of one residence per acre. Greater densities may be permitted by a Specific Plan encompassing at least 160 acres for appropriate recreation-oriented residential development.
Specific Plan	Application of the Specific Plan designation shall be accompanied by adoption of objectives and policies for the design, development, and use of such areas. This may include residential, commercial, industrial, agricultural, recreational, open space, and public uses.
Urban Area	Includes areas surrounding the seven incorporated cities and the unincorporated communities of Niland, Heber, Seeley, Winterhaven, and West Shores/Salton City, Bombay Beach and Palo Verde. These areas are characterized by a full level of urban services, including public water and sewer systems. Residential building intensity is determined by available public facilities and services and physical or environmental factors that may affect the site.

Source: Imperial County Land Use Element, 2015

Residential Development Standards

Zoning regulations are designed to protect and promote the health, safety, and general welfare of residents as well as to implement the policies of the General Plan. Title 9, the County's Land Use Ordinance, also serves to preserve the character and integrity of existing neighborhoods. Residential uses are allowed in a variety of zones, including agriculture, residential, commercial, and open space. Table A-42 shows specific zones that permit residential uses as well as allowed densities and development standards.

TABLE A-42
LAND USE ZONES AND DEVELOPMENT STANDARDS

Zone	Max. Units Per Acre	Min. Lot Area/ Dwelling Unit	Setback[1]			Building Height
			Front Yard	Side Yard*	Rear Yard	
Limited Agriculture (A-1)	2	0.5 acres; 1 acre minimum if an OWTS will be used.	25	5	5[2]	40 feet (ft) or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 30 ft
General Agricultural Rural (A-2)	up to two (2) residences per legal parcel. The ADU subject to a CUP	40 acre minimum. 1 acre per dwelling unit (for 1st unit) except with a CUP, which shall be a minimum of 30,000 square feet (sf) for additional unit. When an OWTS is proposed, the minimum area is 2.5 acres	30	5	10	40 ft or 3 stories, whichever is less
Heavy Agriculture (A-3)	One residence per legal parcel	40 acres gross	30	10	10	
Low-Density Residential (R-1)	5 per acre (net)	6,000 sf/4,500 sf/unit	25**	5	25**	40 ft or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 25 ft
Medium-Density Residential (R-2)	10	6,000 sf minimum for the first unit. And 3,000 sf[2] for lots after	25	5	25	40 ft or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 25 ft

Zone	Max. Units Per Acre	Min. Lot Area/ Dwelling Unit	Setback[1]			Building Height
			Front Yard	Side Yard*	Rear Yard	
Medium-/High-Density Residential (R-3)	29	2,000 sf[3] provided that the basic lot minimum is 6,000 sq ft for the first unit	20	5	15	80 ft or 6 stories; detached accessory structures shall not exceed 2 stories or 25 ft
High-Density Residential & Mobile Home Park/ Subdivision (R-4)	7	6,000 sf except lots within a designated mobile home park zone (1 dwelling unit per legal lot in R-4 zone)	20	5/10[3]	15	30 ft or 2 stories, whichever is less
Light Commercial (C-1)	1 unit subject to Division 4 ADU	1,500 sq ft of lot area per dwelling unit in addition to the minimum lot size (8,000 sq ft)	20	5	15	50 ft or 5 stories, whichever is less
Open Space/ Recreational (S-1)	One residence per legal parcel and one subject to a CUP but will change to reflect current state law (by right)	1 acre	25	10	10	35 ft
Open Space/ Preservation (S-2)	One residence per legal parcel	20 acres net; 1 acre of lot/dwelling unit	30	20	20	40 ft

Source: Imperial County Land Use Ordinance Title 9, 2019

Note: There are no lot coverage restrictions on residential uses beyond compliance with setbacks and accommodating septic systems.

1. *Reports the most restrictive standards for a common lot. For a full listing of additional setback options and requirements, see Imperial County Land Use Ordinance, Title 9.*
2. *Except in the case of through lots, where the designated rear yard shall be equal to the front yard setback.*
3. *No lot in an R-2 zone shall be less than 6,000 square feet and shall provide a minimum of 3,000 square feet/dwelling for multiple dwellings.*
4. *No lot in an R-3 zone shall be less than 6,000 square feet and shall provide a minimum of 2,000 square feet/dwelling for multiple dwellings.*

**Except on a corner lot, which may require 15-to-30-foot setback distances.*

***See options pursuant to section 90502.06*

Typical Densities for Development

The typical built densities for past residential projects in the county have ranged from 1 to 14.5 dwelling units per acre, because typical development has been single-family residential with one dwelling unit per legal parcel based on the zone district. Recently the county received a proposal that reflects a significantly higher density than usual. The Heber del Sol Family Apartments is a 100 percent affordable housing project with 47 units located in the R-3 zone in the Heber community. This multi-family project is proposed at 104 percent of the allowable density on this site and received parking waivers from the County, indicating the County's commitment to approving affordable housing in unincorporated communities.

The typical density for recent single-family development in the county is 4 to 8 dwelling units per acre, with an average of 5 dwelling units per acre. The Heber del Sol project is the only recent multifamily project proposed in unincorporated Imperial County but will be developed at approximately 29 units per acre. Projects that propose a density lower than the minimum density require a General Plan Amendment and a rezone, with no guarantee that one or both will be approved. The county did not receive any requests to approve a project listed on the sites inventory table at a lower than the required density during the 5th cycle planning period. If a request were made for approval of a project that was lower than the required density, it is important to note that the Planning Department would require an appropriate land use designation to match the proposed density. A general plan amendment would be required in this circumstance.

Parking Requirements

Parking standards for single-family homes, duplexes, condominiums, and mobile or manufactured homes require a minimum of two parking spaces per unit and an additional half space for each additional bedroom in excess of three bedrooms. In addition, multifamily developments and mobile home parks are required to provide one guest space for every five units in the project. The parking requirement for accessory dwelling units with zero or one bedroom is one parking space. Accessory dwelling units with two or more bedrooms are subject to the same parking requirements as single-family dwelling units. The County has included Program 8 to amend Title 9 of the Land Use Ordinance to allow ADUs in compliance with Government Code Section 65852.2. Refer to Table A-43 for parking requirements by zone.

Parking requirements for single- and multifamily units do not present a constraint for development in Imperial County. Requirements for multifamily development are less than those for single-family residences.

In addition, the County adheres to the state density bonus law, which allows developers to opt for less parking requirements as an incentive for building a certain percentage of affordable units.

TABLE A-43
RESIDENTIAL PARKING REQUIREMENTS

Type of Residential Development[1]	Required Parking Spaces	Comments
Low-Density Residential	2 spaces/unit; plus 0.5 for each additional bedroom	Single-family dwelling, a duplex dwelling, a condominium, or a mobile home (manufactured) unit
Medium- to High-Density	Same requirement as low-density residential; plus 1 guest space for every 5 units	Multifamily projects (all unit sizes[2])
High-Density Residential & Mobile Home Park	Same requirement as medium density; plus 1 guest space for every 5 mobile homes	2 spaces per mobile home
Accessory Dwelling Unit Zero to 1 bedroom 2+ bedrooms	1 space/unit Same requirement as low density residential	Parking may be provided as tandem parking, on an existing driveway.

Source: Imperial County Land Use Ordinance, Division 4

Notes:

1. *The County has included **Program 8** to amend the Land Use Ordinance to allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii)).*
2. *The County will review parking requirements for smaller multifamily units, including studios and one-bedrooms to determine if current requirements constrain development of units of this size. Based on findings, the County will revise Division 4 as necessary (**Program 8**).*

Density Bonus

Under current state law (California Government Code Section 65915), cities and counties must provide a density increase of up to 80 percent over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with 100 percent of units affordable to low- or very low-income households. The County of Imperial allows a density bonus of 20 percent for residential projects with 50 or more units in the medium-density residential (R-2) zone, high-density residential (R-3) zone, or the mobile home park (R-4) zone if the project provides full-time on-site daycare facilities. A 20-percent density bonus is allowed for residential projects of 20 or more units in the low-density residential (R-1), R-2, R-3, or R-4 zones, if the project provides complete public infrastructure improvements. A density bonus of 20 percent is allowed for any residential project or condominium conversion containing 10 or more units in the R-1, R-2, R-3, or R-4 zones if 30 percent of the units are affordable to lower moderate-

income families. The County has included Program 7 to comply with current density bonus law, as defined in California Government Code Section 65915.

Provision for a Variety of Housing

The Housing Element must identify housing opportunities at a range of types and sizes to ensure that options are available to meet the needs of all segments of the population. The Imperial County Land Use Ordinance provides for a variety of housing types, including single-family dwellings, duplexes, guest dwellings, mobile homes, group residential homes, multiple-unit dwellings, convalescent homes, accessory structures, supportive housing, and single-room occupancy units (SROs). Table A-44 summarizes the housing types permitted and conditionally permitted by zone.

TABLE A-44
HOUSING TYPES PERMITTED BY ZONING DISTRICT

Residential Uses	R-1	R-2	R-3	R-4	C-1	C-2	C-3	A-1	A-2	A-3	AM-1	AM-2	S-1	S-2
Single-Family Dwelling	P	P						P	P	P	P	P	P	P
Apartment		P	P	P	C									
Condominium		P	P	P	C									
Duplex		P	P	P										
Townhouse			P	P										
Quadruplex			P	P										
Guest House	P													
Accessory Dwelling Unit [1]	P	P			P	P	P	P	C	C	P	P	C	
Mobile/Manufactured Home [2]	P	P		P				P						C
Mobile Home Park					C								P	
Community Care Facility		C	C	C	C	C		C						
Residential Care Facilities (serving 5 or less persons)[3]	P	P	P	P					P					
Residential Care Facilities (serving 6 or fewer persons) [3]								P						
Residential Care Facility (serving more than 5 persons) [3]	C	C												
Convalescent Hospital/Home	C				C	P	P							
Retirement or Rest Home	C	C	C	C	C			C		C				

Residential Uses	R-1	R-2	R-3	R-4	C-1	C-2	C-3	A-1	A-2	A-3	AM-1	AM-2	S-1	S-2
Senior Citizen Complex	C							C						
Boarding or Rooming House			P	P	P	P	P	P						
SRO			P	P	P	P	P	P						
Emergency Shelters [4]						P	P	C						
Farm Labor/Employee Housing [5]								P	C	P/C	C	P		
Transitional Housing [6]			P	P		P	P	P						
Supportive Housing [6]			P	P										

Source: Imperial County Land Use Ordinance (Title 9)

P= Permitted, C = Conditional-Use Permit

*1. The County has included **Program 8** to amend the Land Use Ordinance to allow Accessory Dwelling Units (ADUs) in all residential and non-residential zones that permit single-family or multifamily uses, in accordance with California Government Code Section 65852.150.*

*2. The County will amend the Land Use Ordinance to allow and permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings in compliance with California Government Code Section 65852.3(a) (**Program 8**).*

*3. The County will amend the Land Use Ordinance to allow residential care facilities for 6 or fewer persons in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for 7 or more persons in the same manner in accordance with the State's definition of family (**Program 16**).*

*4. Emergency shelters are also permitted by right in the M-1 zone. The County will amend the Land Use Ordinance to allow low-barrier navigation centers for the homeless by-right in zones that allow for mixed-use and non-residential zones permitting multifamily uses, per California Government Code Section 65662 (**Program 16**).*

*5. The County has included **Program 8** to amend the Land Use Ordinance to treat employee/farm labor housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Additionally, the County will amend the Land Use Ordinance to treat employee/farm labor housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with the California Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6).*

*6. Transitional housing is also a permitted use in the M-1 zone. The County will amend the Land Use Ordinance to allow transitional and supportive housing as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone and to allow supportive housing as a permitted use without discretionary review in zones where multifamily and mixed-use developments are permitted, including non-residential zones permitting multifamily uses, in compliance with California Government Code Section 65583(c)(3) (**Program 16**).*

Housing for Persons with Disabilities

According to state law (California Government Code Section 65583 (a)(4)), the Housing Element must analyze constraints upon the development, maintenance, and improvement of housing for persons with disabilities. Health and Safety Code Section 1568.0831 requires residential care facilities for six or fewer persons be considered a residential use of property and be permitted in the same manner as other single-family structures of the same type within the same zone. Additionally, State law defines a family as "one or more persons living together in a dwelling unit," which, under fair housing law, means that residential care facilities for seven or more persons must be treated as a residential use and a jurisdiction cannot regulate how many unrelated persons live together.

Current permitting requirements for residential care facilities act as a constraint to the development of housing for persons with disabilities by limiting where they may be developed in unincorporated areas of Imperial County. Residential care facilities for less than five people are permitted by-right in the following zones: A-2, R-1, R-2, R-3, and R-4. Residential care facilities with more than five people are conditionally permitted in the R-1 and R-2 zones. Additionally, the A-1 zone allows residential care facilities serving six or less people. The County has included Program 16 to amend the Land Use Ordinance to allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for seven or more persons with a valid license issued by the California Department of Social Services (CDSS) in the same manner in accordance with the State's definition of family.

Reasonable Accommodations

California Government Code Section 65583 requires that the Housing Element analyze potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities and demonstrate local efforts to remove governmental constraints that hinder the locality from meeting the need for housing for persons with disabilities (California Government Code Section 65583(a)(4)). As part of the required constraints program, the element must include programs that remove constraints or provide reasonable accommodations for housing designed for persons with disabilities (California Government Code Section 65583(c)(3)).

The County's reasonable accommodation procedures are included in the Title 9 Land Use Ordinance, Division 3, Chapter 7. Chapter 7 describes procedures to facilitate requests for variations in the enforcement of development standards to accommodate special requirements resulting from a disability. In compliance with SB 520, a complete evaluation of the County's zoning laws, practices, and policies was done as part of the Housing Element update process.

- Reasonable accommodations - In 2013, the County amended Ordinance 1487 to provide a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. The County has included Program 17 to review and update the findings for a reasonable accommodation request to comply with State law. The existing findings to approve, deny, or approve with conditions a reasonable accommodation request are as follows:

- Whether the housing in the request will be used by an individual considered disabled under the acts.
- Whether the request for reasonable accommodation is necessary to make specific housing available to an individual considered disabled under the acts.
- Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the county.
- Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a county program or law, including but not limited to, land use and zoning.
- Potential impact on surrounding uses.
- Physical attributes of the property and structures.
- Other reasonable accommodations that may provide an equivalent level of benefit.

- Separation requirements - The County's Land Use Ordinance does not impose any separation requirements between supportive housing or residential care facilities.
- Site planning requirements - The site planning requirements for group homes and residential care facilities are no different than for other residential uses in the same zone.
- Definition of family - To ensure the County does not have any practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals, the County has included Program 16 to include a definition of family that does not limit family by size or relation.

Emergency Shelters

The California Health and Safety Code (Section 50801) defines an emergency shelter as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay."

California Government Code Section 65583(a)(4)(A) requires jurisdictions to allow emergency shelters in at least one zone with adequate vacant land without a conditional-use permit. The Imperial County Land Use Ordinance allows emergency shelters by-right in the C-2 (General Commercial) and M-1 (Light Industrial) zones. Emergency shelters with a conditional use permit are allowed in the A-1 zone. Much of the vacant land in these zones is located near existing urban areas and incorporated cities, where transportation and other services could reasonably be expected to be extended in the future. There are approximately 3,000 vacant acres of General Commercial (C-2), Light Industrial (M-1), and Medium Industrial (M-2) zoned land across unincorporated areas of the County.

Vacant sites in the M-1, M-2, and C-2 zones are at a wide range of sizes, suitable to accommodate shelters of various sizes. Within the M-1 and C-2 zones, there are over 1,000 vacant parcels under 1 acre, 96 that are from 1 to 5 acres, 9 that are 5 to 10 acres, and 11 that are 20 acres or more.

Transitional and Supportive Housing

Transitional housing is defined in Section 50675.2 of the Health and Safety Code as rental housing for stays of at least six months but where the units are recirculated to another program recipient after a set period. It may be designated for a homeless individual or family transitioning to permanent housing. This housing can take many structural forms, such as group housing and multifamily units and may include supportive services to allow individuals to gain necessary life skills in support of independent living. California Government Code Section 65583(c)(3) requires that jurisdictions consider transitional housing a residential use and only require the same restrictions as those applied to other residential dwellings of the same type in the same zone.

Supportive housing is defined by Section 50675.14 of the Health and Safety Code as housing with linked on-site or off-site services with no limit on the length of stay and occupied by a target population, as defined in Health and Safety Code Section 53260 (i.e., low-income person with mental disabilities, AIDS, substance abuse or chronic health conditions, or persons whose disabilities originated before the age of 18). Services linked to supportive housing usually focus on retaining housing, living and working in the community, and/or health improvement. State law (California Government Code Section 65583(c)(3)) requires supportive housing be "considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone;" additionally, supportive housing must be permitted by-right in all residential and non-residential zones where multifamily and mixed-uses are permitted.

Transitional housing is currently permitted without a conditional-use permit in zones R-3, R-4, C-2, and A-1 and supportive housing is permitted without a conditional-use permit in zones R-3 and R-4. The County has included Program 16 to amend the Land Use Ordinance to treat transitional and supportive housing as a residential use type and subject only to the same regulations as any other use in the same zoning district. Additionally, the County will amend the Land Use Ordinance to allow supportive housing in any zone district that allows multifamily, in compliance with Government Code Section 65650.

Extremely Low-Income Households

Extremely low-income households typically comprise persons with special housing needs, including, but not limited to, persons experiencing homelessness or at risk of homelessness, persons with substance abuse problems, and farmworkers. AB 2634 (Lieber 2006) requires the quantification and analysis of existing and projected housing needs of extremely low-income households. Housing Elements must also identify zoning to encourage and facilitate supportive housing and single-room occupancy units.

The County has identified single-room occupancy units (SROs) and boarding or rooming houses as units that can serve as an affordable housing option for lower-income households and those with special housing needs, including persons who are homeless or near-homeless, persons with substance abuse problems, and farmworkers. The County defines SROs as "a single room that is the primary residence of its occupant. The unit may contain food preparation or sanitary facilities" allows them as a permitted use (without a

conditional-use permit) in the R-3, R-4, A-1, C-1, and C-2 zones, in compliance with Government Code Section 65583.

Accessory Dwelling Units

Accessory Dwelling Units (ADU) provide opportunities for affordable units. Government Code Section 65852.2 requires that ADUs be permitted ministerially in any residential zone or non-residential zone that permits residential uses. In Imperial County, ADUs are currently permitted by-right in the R-1, R-2, C-1, A-1, AM-1, and AM-2 zone districts. ADUs are conditionally permitted in the A-2, A-3, and S-1 zone districts. ADUs offer an opportunity for homeowners to earn additional income and provide an opportunity for affordable housing units. Section 90405.08 of Title 9, Division 4 of the County's Land Use Ordinance, property owners must submit a signed affidavit that they currently reside on the property on which an ADU is proposed and will continue to occupy either the primary or accessory dwelling unit.

The County has included Program 8 to allow ADUs in all residential and non-residential zones that permit residential uses, in compliance with Government Code Section 65852.

Manufactured Housing and Mobile Homes

Under California Government Code Section 65852.3(a) jurisdictions must allow certified manufactured homes on all lots zoned for conventional, stick-built single-family dwellings. The only difference in regulation between manufactured homes and conventional single-family dwellings may be with respect to architectural requirements. The Imperial County Land Use Ordinance currently allows manufactured homes as a permitted use in the R-1, R-2, R-4, and A-1 zone districts. To remove barriers to the development of a potential affordable housing option, the County will amend the Land Use Ordinance to allow and permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings, in compliance with State law (Program 8).

Farmworker Housing

Under State law, jurisdictions must treat employee housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Additionally, employee housing consisting of no more than 12 units or 36 beds treated as an agricultural use must be permitted in the same manner as other agricultural uses in the same zone.

The Imperial Valley Housing Authority provides housing for permanent farmworkers that is regulated through the United States Department of Agriculture's (USDA's) Rural Development office. The County permits employee housing/farm labor housing by-right in the A-1, A-3, and AM-2 zones and conditionally in the A-2 and AM-1 zones. No additional special conditions are described in the Land Use Ordinance for any type of farm labor housing. These structures are treated the same as any other residential and residential accessory building. The County will amend the Land Use Ordinance to remove reference to farm

labor housing and will allow employee housing in compliance with Health and Safety Code Sections 17021.5 and 17021.6 (Program 8).

Processing and Permit Procedures

Design Review

The County established reasonable and necessary development standards for residential uses to ensure that development includes the appropriate public improvements and is compatible with surrounding land uses. All residential developments in the R-1, R-2, R-3, and R-4 zones must comply with developmental standards stated in Division 3 of the county's Land Use Ordinance. Landscaping standards are also established for mobile homes and RV parks, multi-unit residential, and single-unit residential.

All residential developments, including both single- and multi-family, in the R-1, R-2, R-3, or R-4 zones much comply with the following:

- Street and road dedication shall be made to the County in the manner described by the Imperial County Public Works Department for all existing or proposed local, secondary, or collector highways. The required dedication shall be 30 feet from the centerline for local streets, 45 feet from the centerline for secondary streets, 55 feet from the centerline for collector highways, or as required by adopted, official or Specific Plans. In the case where a street is on the boundary of a development, a minimum of 40 feet shall be dedicated to the County.
- Development in all areas shall provide road or street improvements to County standards. Such street improvements shall include the required base and pavement to tie existing pavement to proposed entrances, exits, etc. Existing pavement shall be soft cut at a match point. If the project site abuts a state highway, road improvements shall be provided as required by the California Department of Transportation.
- Obstructions within street rights-of-way shall be removed as specified by Imperial County Public Works Department.
- Curbs, gutters, and sidewalks shall be constructed as required by County standards.
- All new on-site utility services shall be placed underground unless the utility supplier requests otherwise.
- Prior to the issuance of any Building Permits for new projects, plans for the management and disposal of all surface drainage water(s) originating on-site shall be approved by the Imperial County Department of Public Works in coordination with the Imperial County Public Health Department, Division of Environmental Health, as needed. All necessary easements, rights-of-way, or grant deeds shall be granted to the County for drainage purpose or access thereto as reviewed and approved by the Department of Public Works.
- Prior to issuance of any Building Permits, the methods of water supply and sewage disposal shall meet the requirements of and be approved by one or more of the following agencies: Imperial

County Division of Environmental Health Services, California Department of Public Health, Regional Water Quality Control Board (Colorado River Basin) of the California Environmental Protection Agency.

- Fire protection facilities and access ways shall meet the requirements of and be approved by the Imperial County Fire Department /Office of Emergency Services.
- When adjacent to property zoned for non-residential purposes, a seven-foot-high solid masonry wall shall be constructed between the proposed development and the adjacent property. The wall height shall be reduced to 30 inches if the fence is obscured and 42 inches if translucent within the required front-yard setback area. The proposed wall design and materials shall be approved by the Planning and Development Services Department.
- All exterior lighting shall be directed away from adjacent properties, and away from or shielded from public roads.
- All trash receptacles shall be screened so that they are not visually obtrusive from any off-site location. The location and method of screening for all trash receptacles shall also minimize potential for nuisance, be consistent with ease of solid waste removal, and shall be approved by the Planning Director.
- Architectural design of all proposed structures shall be compatible with the surrounding neighborhood.
- For developments with 10 or more dwellings, a minimum of 5 percent of the net total parcel area shall be designated and developed as useable open space provided; however, no less than 400 square feet of useable area shall be designated and developed. The required useable area may be divided into more than one location, provided no single location is less than 400 square feet.
- During all on-site grading and construction activities, adequate measures shall be implemented to control fugitive dust emissions.

Imperial County's mixed-use flexibility zone (C-1, Light Commercial, and C-2, General Commercial) provides development opportunities for integrated, complementary residential and commercial development in the same areas. A wide range of uses is permitted, and it is the intent of the mixed-use flexibility zone to foster a mixture of product types. Development solely as commercial or residential districts is strongly discouraged. Design and development standards are directed toward encouraging pedestrian activity and ensuring that mixed commercial and residential uses are designed to be compatible both within the development and with other surrounding areas. All development in the C-0, C-1, C-2, C-3, M-1, M-2, and M-3 zones shall comply with the following:

- Street and road dedications shall be made to the County in a manner prescribed by Imperial County Public Works Department, for all existing or proposed local, secondary or collector highways. The required dedication shall be 30 feet from centerline for local streets, 45 feet from centerline for secondary streets, 55 feet from centerline for collector streets.

- All developments shall provide road or street improvements as required by the Department of Public Works, and to the standards contained within the Land Use Ordinance (Title 9).
- Obstruction within street right-of-ways shall be removed as specified by Title 9.
- Curbs, gutters and sidewalks shall be constructed as required by Title 9 when required as part of the street improvement.
- All access driveways, parking areas and vehicular maneuvering areas shall be surfaced with a minimum of three (3) inches of asphaltic concrete paving or higher quality material.
- All new on-site utility services shall be placed underground.
- Prior to the issuance of Building Permits, a plan for the disposal of all surface drainage water originating on site shall be approved by the Department of Public Works in coordination with the Imperial County Public Health Department, Environmental Health Division, as needed. Easements or right-of-way deeds shall be granted to the County of Imperial for drainage purposes.
- Prior to the issuance of any Building Permit, the method of water supply and sewage disposal shall be as required and approved by one or more of the following agencies: Imperial County Environmental Health Services Division, California Department of Public Health, Regional Water Quality Control Board (Colorado River Basin) of the California Environmental Protection Agency.
- Fire protection facilities and access ways shall be as required and approved by the Imperial County Fire Department.
- When adjacent to property zoned for single family residential use, a seven (7) foot high masonry wall shall be constructed between the proposed development and the adjacent property.
- All exterior lighting shall be shielded and directed away from adjacent properties and away from or shielded from public roads.
- All trash receptacles shall be screened in such a manner so that they are not visually obtrusive from any off-site location. The location and method of screening for all trash receptacles shall also minimize potential for nuisance, be consistent with ease of solid waste removal, and shall be approved by the Planning Director.
- Architectural design of proposed buildings shall be compatible with the surrounding neighborhood.
- For industrial or commercial developments utilizing outside storage, the areas devoted to outside storage shall be treated with a dust binder or other dust control measures, as approved by the APCD.
- During all on-site grading and construction activities, adequate measures shall be implemented to control fugitive dust.

New development in the Mixed Use Overlay – Light Commercial (C1-MU) and General Commercial Use (C2-MU) zones is subject to a Site Plan Review Permit, in accordance with Division 3 of the Land Use

Ordinance. The Planning and Development Services Department may approve a Site Plan Review Permit for new development in the C1-MU and C2-MU Zones upon making the following findings:

1. The proposed development is consistent with the General Plan, any applicable Specific Plans, and the intent and purpose of the mixed-use overlay.
2. The proposed development, as conditioned, will not have substantial adverse effects on the surrounding property or uses, and will be compatible with the existing and planned land use character of the surrounding area.
3. The proposed development is appropriate for the site and location by fostering a mixture and variety of land uses within the zone and the general vicinity and contributing to a synergistic relationship between uses.
4. The proposed development is harmonious with its surrounding environment. Buildings within a mixed-use development project must also be compatible with each other and be designed as an integrated, unified project.

All proposed developments must meet the design standards and guidelines in Division 3 (Site and Design Standards). Innovative project design, particularly involving infill development and reuse of existing structures, is required. However, the County has taken several steps to streamline the development review approval process. Design review is an administrative process that does not require a Planning Commission or Board of Supervisors hearing. The Imperial County Planning and Development Services Department has final review authority and may waive any of the above listed requirements for the residential, commercial, and industrial zones where a documented hardship not involving economics exists, or where there are unusual circumstances that prevent compliance with the required development standards listed above. Additionally, the County offers pre-application reviews (PAR) as an optional procedure for development proposals to provide direction for applicants by assessing whether a prospective proposal is consistent with County standards and requirements before a formal application submittal. PARs also aid in shortening processing time for development proposals once they are submitted by limiting requests to those findings made in the PAR letter. Request forms for a pre-application review are available on the County's website. The County has also included Program 28 to review and update development standards to be objective and quantifiable. With the administrative review process and optional PARs, design review is not a constraint on development.

Conditional-Use Permits

A Conditional-Use Permit (CUP) provides a process for reviewing uses and activities that may be appropriate in the applicable zoning district, but whose effect on the site and surrounding uses cannot be determined before being proposed for a specific site. Imperial County has three types of conditional use permits: minor, intermediate, and major. A minor conditional-use permit (CUP-1) typically allows for a accessory dwelling unit, facilities for abused men/women/children for up to five users, temporary real estate during construction, and other non-residential uses. An intermediate conditional-use permit (CUP-2) allows for facilities for abused men/women/children for in excess of five users and other non-residential uses. A major conditional-use permit (CUP-3) is for projects whose total developed value is greater than $1,000,000. Minor

conditional-use permits may be approved or denied by the Planning Director or may be forwarded to the Planning Commission, while intermediate and major conditional-use permits shall be approved or denied by the Planning Commission. Appeals may be made to the Board of Supervisors. The County has included Program 16 to remove conditional-use permit requirements for second units (now accessory dwelling units) and domestic violence shelters.

The following findings must be made for the Planning Director or Planning Commission to approve an application for a conditional-use permit:

1. The proposed project is consistent with the General Plan.
2. The project is consistent with Title 9 of the Imperial County Land Use Ordinance.
3. The Director of Public Works, the Director of Air Pollution Control District, the Director of Environmental Health (EH), the Director of Fire/Office of Emergency Services (OES), the Agriculture Commissioner, and the Sheriff have reviewed the proposed project and approved the project.
4. Public opposition has been considered and all impacts have been mitigated.
5. The applicant agrees to all conditions and standards required for the project.

Findings

The findings required to authorize a conditional-use permit do not constrain the development of affordable housing. The following list does not contain any language that calls out any special conditions for affordable housing types. Any use permitted with a conditional-use permit must satisfy all of the following criteria:

- The proposed use is consistent with the goals and policies of the adopted County General Plan.
- The proposed use is consistent with the purpose of the zone within which the use will be located.
- The proposed use is listed as a use within the zone or sub-zone or is found to be similar to a listed conditional use.
- The proposed use meets the minimum requirements of the Land Use Ordinance applicable to the use and complies with all applicable laws, ordinances, and regulations of the County of Imperial and the State of California.
- The proposed use will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.
- The proposed use does not violate any other law or ordinance.
- The proposed use is not granting a special privilege.

Compatibility findings for conditional use permits ensure that projects initially comply with Imperial County regulations and include ongoing monitoring to confirm that the project continues to comply throughout

the development process. While conditional use permit findings do place requirements on projects, they are necessary to ensure compatibility between uses and protect the health and safety of the public and do not place unnecessary constraints on development.

Local Processing and Permit Procedures

The County strives to perform thorough but expedient permit processing, with average processing times equal to or less than those of similar jurisdictions. Permit processing time varies based on the type and specifics of development applications. The approximate permit processing times for all types of permits is shown in Tables A-45 and A-46. The typical permit processing time for residential development greatly depends on whether the proposed development is a permitted use or if a rezone or conditional-use permit is required.

After the County approves a project, such as at Planning Commission or Board of Supervisors hearing, it becomes the applicant's responsibility to initiate the steps to secure building permits and approvals and begin construction as per approved plans. These steps include obtaining additional County clearances and paying fees as outlined in a project's conditions of approval. Other necessary actions include:

- Completing construction drawings
- Recording subdivision (final) maps (applies to ownership projects)
- Retaining contractors
- Obtaining utility approvals, required easements and rights of entry

The length of time between a project's approval and building permit issuance in many cases is determined by the applicant. Once a project begins the construction plan review process, the following general timelines can be achieved with responsive applicants:

- Land Use Entitlement Procedures may state at 3-6 months but if they are considered major projects, the process could take up to a year or more
- Building permit approval: 1-3 months

Senate Bill 330 Processing Procedure

Senate Bill 330, the Housing Crisis Act of 2019, established specific requirements and limitations on development application procedures. Consistent with SB 330, housing developments for which a preliminary application is submitted that complies with applicable General Plan and zoning standards are subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application.

Imperial County offers pre-application meetings to anyone with a proposed project prior to submission of formal applications to better define the information needed to review a project. Pre-application meetings have helped to shorten the review process and allow for better communication between applicants and County departments. The County currently defers to HCD for the required application process but will consider creating a County specific process during the planning period.

Senate Bill 35 Approvals

Senate Bill 35 requires jurisdictions that have failed to meet their RHNA to provide streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. Imperial County will also establish a written policy or procedure and other guidance as appropriate to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects, as set forth under California Government Code Section 65913.4 (Program 28).

TABLE A-45
PROCESSING REQUIREMENTS AND FEES SCHEDULE

Project Type	INITIAL REVIEW AND COMMENT PERIOD		CEQA PROCESS		
	Application Review for Completeness and Consistency	Responsible Agency Comment Period	Preparation of Environmental Checklist (Initial Study)	Project Exempt from CEQA	Environmental Evaluation Committee Hearing
Typical Time Frame	**10 to 30 days[1]**	**15 days[1]**	**15to 30 days[1]**	**15 to 30 days[1]**	**90 days[2]**
Conditional-Use Permit					
Minor	Yes		N/A	Yes	N/A
Intermediate	Yes		Yes	N/A	Yes
Major	Yes		Yes	N/A	Yes
Subdivision					
Minor	Yes		Yes	N/A	Yes
Major	Yes		Yes	N/A	Yes
Lot Line Adjustment	Yes		N/A	Yes	N/A
Lot Merger	Yes		N/A	Yes	N/A
Certificate of Compliance	Yes		N/A	Yes	N/A
Change of Zone	Yes		Yes	N/A	Yes
General Plan Amendment	Yes		Yes	N/A	Yes
Variance	Yes		N/A	Yes	N/A
Envir. Assessment (only)	Yes		Yes	N/A	Yes
Time Extensions	Yes		N/A	Yes	N/A

Source: Imperial County Planning and Development Services, 2021

1. The project acceptance, agency review, initial study preparation or exempt for CEQA, are all done concurrently with one another typically within the first 30 days of receiving the project.

2. Some projects are subject to public hearings. If that is the case, County staff sends the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

TABLE A-46
AVERAGE DISCRETIONARY PERMIT PROCESSING TIMES

Project Type	CEQA PROCESS (continued)			PROJECT APPROVAL PROCESS	
	Circulation Period[1]			Appeal of EEC Determination to Planning Commission	Planning Commission Hearing
	Neg. Dec.	Mit. Neg. Dec.	EIR		
Typical Time Frames	20 days	30 days	1 year	10 days[2]	up to 180 days[3]
Conditional-Use Permit					
Minor	N/A			N/A	Yes
Intermediate	If Determined			If Appealed	Yes
Major	If Determined			If Appealed	Yes (need B/S App)
Subdivision					
Minor	If Determined			If Appealed	Yes
Major	If Determined			If Appealed	Yes (need B/S App)
Lot Line Adjustment	N/A			N/A	Yes
Lot Merger	N/A			N/A	Yes
Certificate of Compliance	N/A			N/A	Yes
Change of Zone	If Determined			If Appealed	Yes (need B/S App)
General Plan Amendment	If Determined			If Appealed	Yes (need B/S App)
Variance	N/A			N/A	Yes
Envir. Assessment (only)	If Determined			If Appealed	Yes
Time Extensions	N/A			N/A	Yes

Source: Imperial County Planning and Development Services, 2021

1. This time chart assumes all projects receive a Negative Declaration, which requires a 20-day circulation period or a Mitigated Negative Declaration, which requires a 30-day circulation. For projects that require an Environmental Impact Report, add up to one year.

2. Both the applicant and the public have 10 days from the date of hearing to appeal the hearing's determination to the next hearing body. The appeal of the Board of Supervisors can only be done with a majority of the supervisors agreeing to it.

3. County staff send the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

TABLE A-46 (CONT.)
AVERAGE DISCRETIONARY PERMIT PROCESSING TIMES

Project Type	PROJECT APPROVAL PROCESS (continued)					TOTAL		
	Appeal of PC Determination to Board of Supervisors		Board of Supervisors Hearing	Appeal of B/S back to B/S		Processing Time[3]		
Typical Time Frames	10–days[1]	10days[2]	10days[1]	Best	Worst	Avg.		
Conditional-Use Permit Minor	If Appealed			N/A		34 days	74 days	40 days
CUP Intermediate	If Appealed			N/A		54 days	150 days	75 days
CUP Major	N/A		Yes	If Appealed		74 days	157 days	92 days
Subdivision Minor	If Appealed			N/A		54 days	150 days	75 days
Subdivision Major	N/A		Yes	If Appealed		74 days	157 days	92 days
Lot Line Adjustment	If Appealed			N/A		34 days	74 days	40 days
Lot Merger	If Appealed			N/A		34 days	74 days	40 days
Certificate of Compliance	If Appealed			N/A		34 days	74 days	40 days
Change of Zone	N/A		Yes	If Appealed		74 days	157 days	92 days
General Plan Amendment	N/A		Yes	If Appealed		74 days	157 days	92 days
Variance	If Appealed			N/A		34 days	74 days	40 days
Envir. Assessment (only)	N/A			N/A		54 days	150 days	75 days
Time Extensions	If Appealed			N/A		34 days	74 days	40 days

Source: Imperial County Planning and Development Services, 2021

1. Both the applicant and the public have 10 days from the date of hearing to appeal the hearing's determination to the next hearing body. The appeal of the Board of Supervisors can only be done with a majority of the supervisors agreeing to it.

2. County staff send the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

3. Processing Time

Review of Local Ordinances

The County does not have any locally adopted ordinances that hinder the development of housing.

Development Fees

Planning and Building fees vary greatly depending on the type of development. A developer proposing a multifamily project will submit building plans to the Building Department and pay the corresponding building permit and development fees (see Table A-48). The proposal is then forwarded to the Planning Department for site plan review, zoning review is included in the building permit fees. The same is true for single-family developments if the proposed site is already mapped. If not mapped, the applicant would be charged for a minor or major subdivision, depending on the size of the development. New construction building fees are based on a *Nexus Methodology Study* conducted in November 2004 and adopted by the Board of Supervisors. These fees are based on actual processing costs and 100-percent cost recovery and do not present a constraint to development. Concurrently with this Housing Element update, the County is updating building fees and will ensure new fees do not constrain development.

Development impact fees are a potential constraint to affordable housing development. The County charges impact fees for sheriff, general government, fire, parks and recreation, and libraries. Impact fees for unincorporated areas total $4,673 per unit for a single-family dwelling, $4,146 per unit for multifamily housing, and $3,205 per mobile home unit (see Table A-47). The County Board of Supervisors approved these development fees as well as an exemption for residential units in projects constructed as housing for lower-income households, as such households are defined pursuant to Section 50079.5 of the Health and Safety Code. Additionally, developers of senior citizen residential units are only required to pay 60 percent of the total impact fee amount per unit.

Development fees may be reduced through the application of the state density bonus law, which allows developers that provide certain percentages of a project's total units affordable to lower-income households to receive a density bonus or other incentive or concession. The County abides by the state density bonus law and works with developers that request reductions in development standards or fee waivers. The County's development standards and fees are available on the County's website.

TABLE A-47

IMPERIAL COUNTY IMPACT FEES

Impact Fee	Single-Family	Multi-Family	Mobile Home
Sheriff	$317	$727	$217
General Government	$350	$267	$239
Fire	$1,273	$977	$871
Parks and Recreation	$452	$354	$303
Public Works	$1,894	$1,453	$1,296
Library Service District	$387	$368	$279
Total Impact Fees	**$4,673**	**$4,146**	**$3,205**

Source: Imperial County Code of Ordinances Title 4, 2008

TABLE A-48
IMPERIAL COUNTY LAND USE FEES

Process	Total Fee
Application/Process Types	
Appeal (Director to P.C.)	$650
Time Extension by Director	$400
Time Extension by P.C./BOS	$800
Zoning Review - Building Permit	$150
Zoning Information Letter (per parcel)	$150
Administrative Permitting/Hearing	$2,250
Design Review - Residential - base (1 unit)	$600
Design Review - Residential - each additional unit	$350
Specific Planning	
General Plan Amendment	$12,000
Zone Change	$11,500
Specific Plan Review	$13,500
Variance	$1,000
CEQA Review Only (Minor)	$2,500
CEQA Review Only (Major)	$2,500
Notice of Exemption	$550
Subdivisions	
Minor Subdivision (<4 lots)	$5,700
Major Subdivision (>5 lots)	$12,000
Lot Line Adjustment (<4 lots)	$3,350
Lot Merger (<4 lots)	$3,350
Reversion to Acreage	$5,200
Certificate of Compliance	$1,600
Conditional-Use Permits (CUPs)	
2nd Dwelling - Administrative CUP	$1,500
2nd Dwelling - P.C. CUP	$2,000
Minor CUP	$3,300
Intermediate CUP	$5,500
Major CUP	$11,000
Public Works Survey Review	
Legal Description Review: Lot Line Adjustment/Lot Merger/Certificate of Compliance	$300
Legal Description Review: Road Right-of-Way	$400
Reversion to Acreage	$400

Process	Total Fee
Annexation Map Review (LAFCO)	$500
Environmental Constraint Sheet	$350
Amending Certificate	$200
Amending Map	$400
Corner Record Card	$7
Record of Survey	$500

Source: Imperial County Land Use Ordinance, Division 9, 2015
P.C. = Planning Commission, BOS = Board of Supervisors

On-and Off-Site Improvements

Developers of multifamily projects and single-family housing tracts are generally responsible for on- and off-site improvements, including curbs, gutters, and sidewalks, and, depending on the location, extension of sewer and water services. This requirement is necessary because it is the only way to provide infrastructure to developments and does not present a constraint to development.

Residential developments in the R-1, R-2, R-3, and R-4 zones are subject to the following site improvement requirements and standards:

- Dedicate streets and roads to the County. The required dedication is 30 feet from the centerline for local streets, 45 feet from the centerline for secondary streets, and 55 feet from the centerline for collector highways. Typical street widths are 60 feet for local residential streets, 70 to 84 feet for collectors, 102 to 136 feet for arterials, and 210 feet for expressways.
- Connect proposed exits and entrances to existing pavements.
- Provide curbs, gutters, and sidewalks.
- New on-site utility services must be placed underground unless the utility supplier requests otherwise.
- Plans for management and disposal of surface drainage water(s) originating on-site.
- Adequate drainage, potable water, and sewage disposal.
- Provide fire protection facilities and access ways that meet requirements of Imperial County Fire Department/Office of Emergency Services.
- When adjacent to property zoned for non-residential purposes, construct a seven-foot-high solid masonry wall.
- A lighting plan, exterior lighting shall be directed away from adjacent properties and public roads.
- Developments of 10 or more dwellings must provide a minimum 5 percent of the net area as usable open space.

Residential development is also subject to landscaping requirements based on the residential use, as follows:

- Mobile Home/R.V. Parks
  - A minimum of 10 percent of the developed lot area must be landscaped. Ornamental or landscaping rock and gravel areas, artificial turf, or other artificial materials shall be considered hard surface and not qualify as part of the 10 percent.
  - Setback areas must be landscaped. Within these areas, trees must be planted no further than 50 feet apart and no closer than 5 feet from the edge of the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.
  - Within the interior of the mobile home park/R.V. park, at least one tree per space must be provided.
  - Within each planter or landscaped area, an irrigation system and live landscaping shall be provided and continually maintained.
  - Landscaping materials, including trees, shrubs, and ground cover should be the type suitable for the climatic conditions of the County of Imperial and shall be low volume water-use plants.
  - Minimum tree size or shrub size to be planted for any new development shall be of the five gallon capacity or larger.
- Multi-unit residential
  - A minimum of 15 percent of the total developed area must be landscaped (in addition to any required park or open space area).
  - Setback areas, excluding driveways, sidewalks, and maneuvering areas, must be landscaped. Within these areas, trees must be planted no further than 30 feet apart and no closer than 5 feet from the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.
  - A minimum of 10 percent of off-street parking areas must be planters and landscaped areas.
  - All interior open space area shall be landscaped with live landscaping.
- Single-unit residential
  - A minimum of 20 percent of the total developed lot area must be landscaped.
  - The setback areas, excluding driveway entrances and public walkways, must be landscaped. Within these areas, trees must be planted no further than 30 feet apart and no closer than 5 feet from the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.

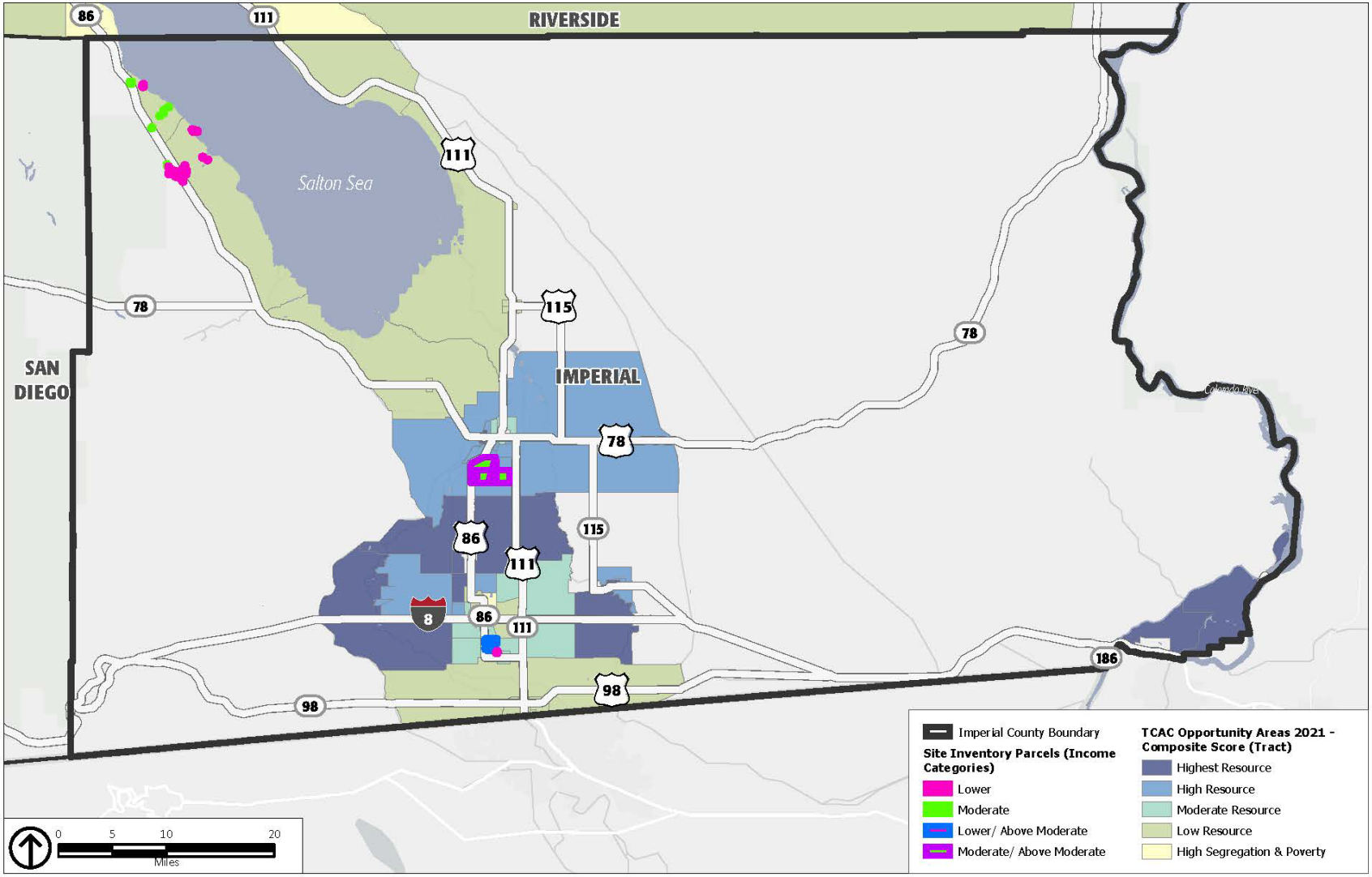
Building Codes and Enforcement

The County has adopted the 2019 California Building Code, which regulates the construction of all physical structures in the county. This code is widely used throughout California, and its implementation in Imperial County does not impose additional or unusual constraints to housing development. Use of this standardized code, rather than a locally prepared building code, may reduce costs, as developers are not burdened with learning the detailed regulations of a unique code. The County has not made any local amendments to the Building Code.

The County has active code enforcement and building inspection programs that work to uphold adopted codes and encourage the improvement of substandard dwelling units. Violations are primarily identified on a complaint basis or through the general observation of Building Code officers.

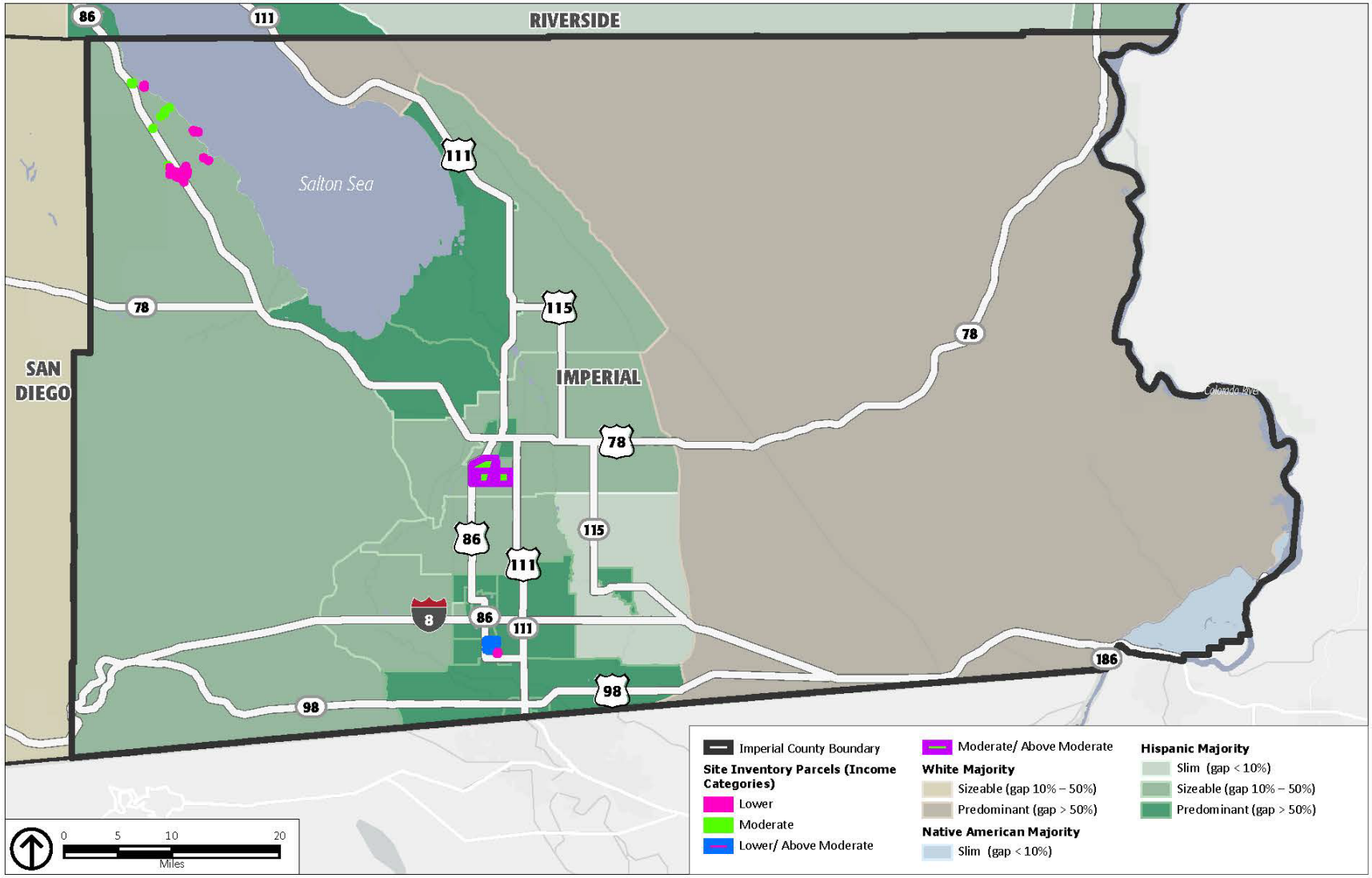
Appendix B: Fair Housing Maps

FIGURE B-1
SITES INVENTORY AND TCAC/HCD OPPORTUNITY AREAS



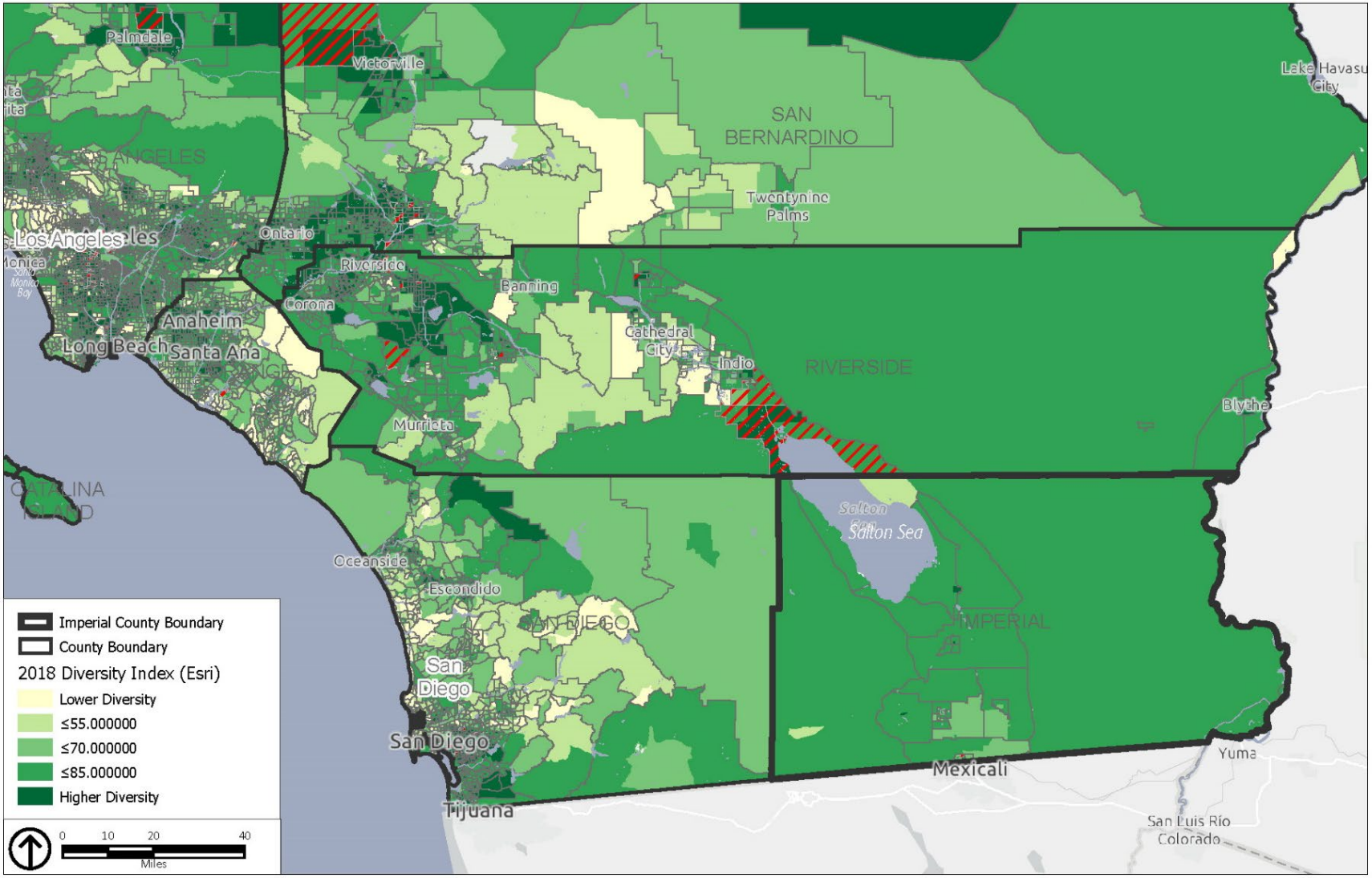
Source: TCAC/HCD, 2021.

FIGURE B-2
SITES INVENTORY AND PREDOMINANT POPULATIONS



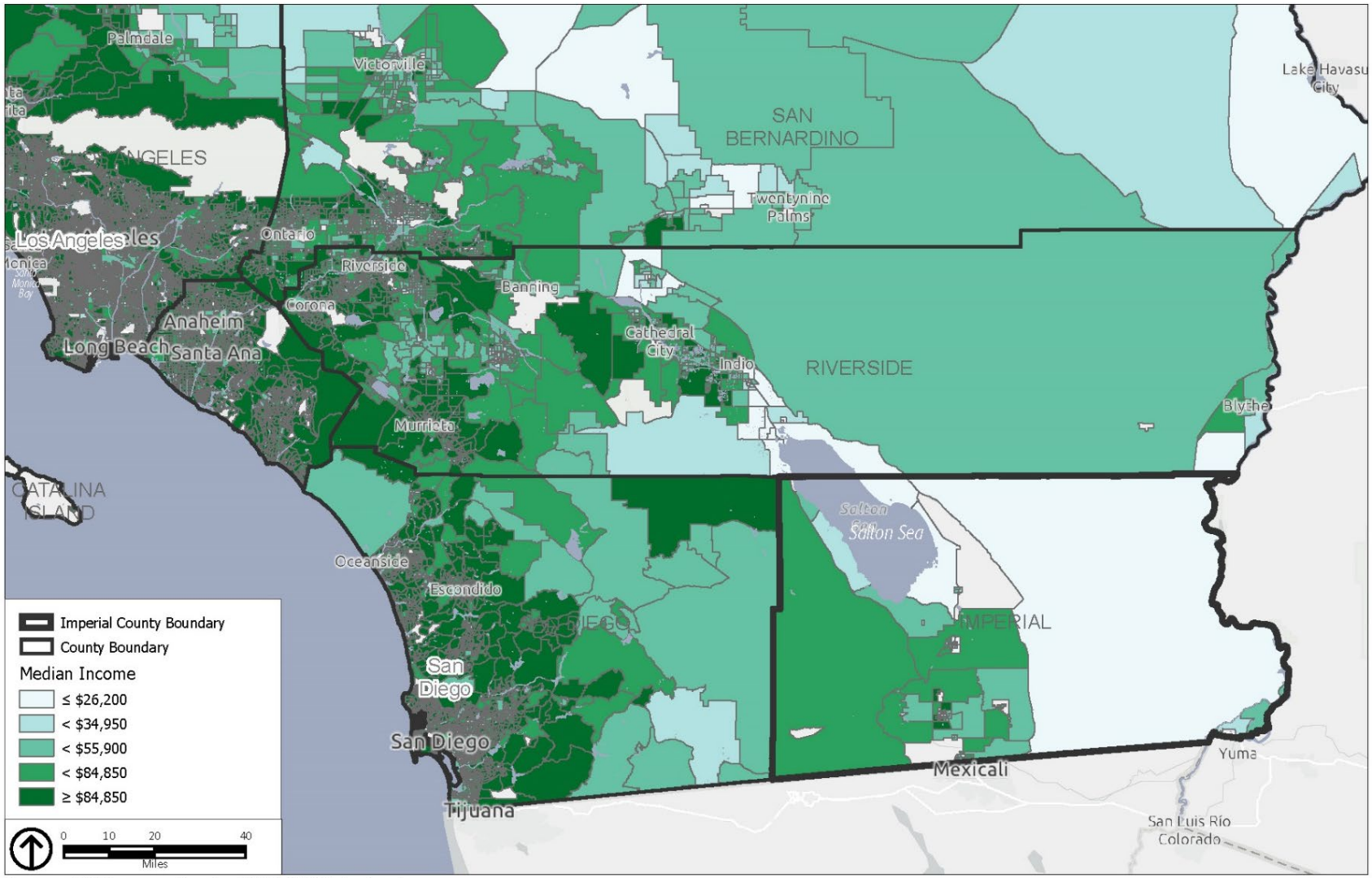
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-3
DIVERSITY INDEX 2018



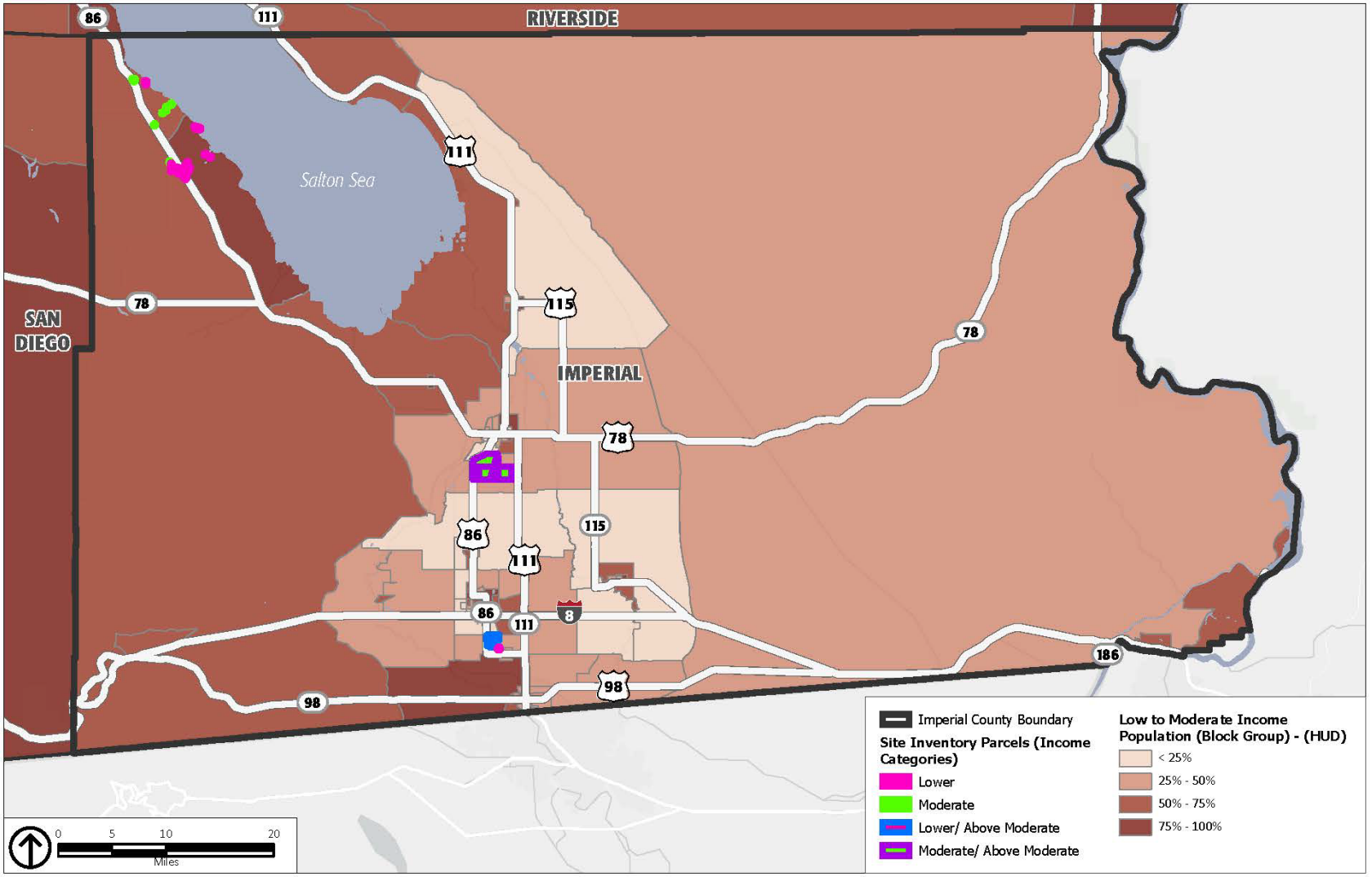
Source: Esri, 2018.

FIGURE B-4
MEDIAN INCOME (2015-2019)



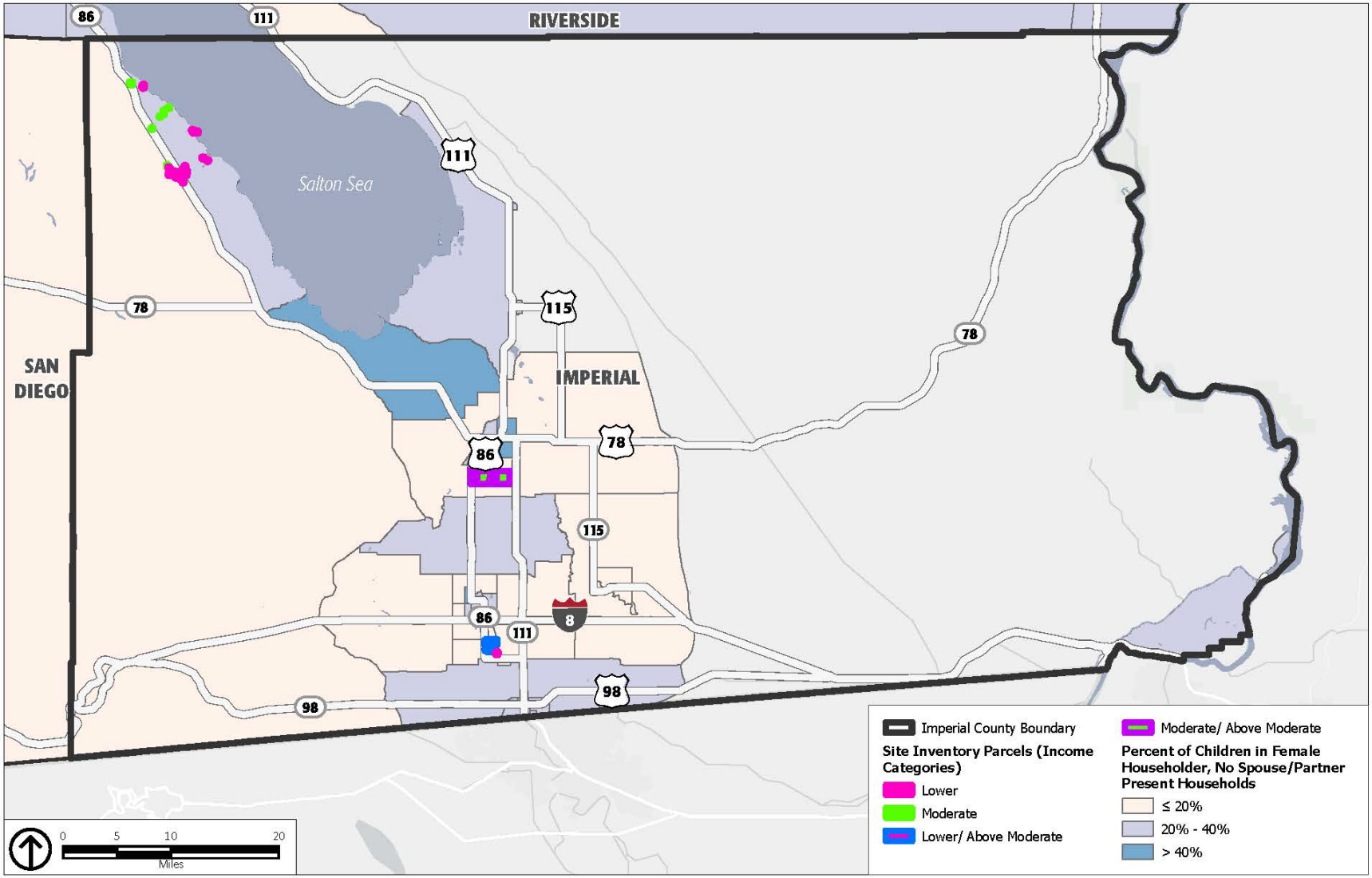
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-5
SITES INVENTORY AND PERCENT OF POPULATION WITH LOW- TO MODERATE-INCOMES



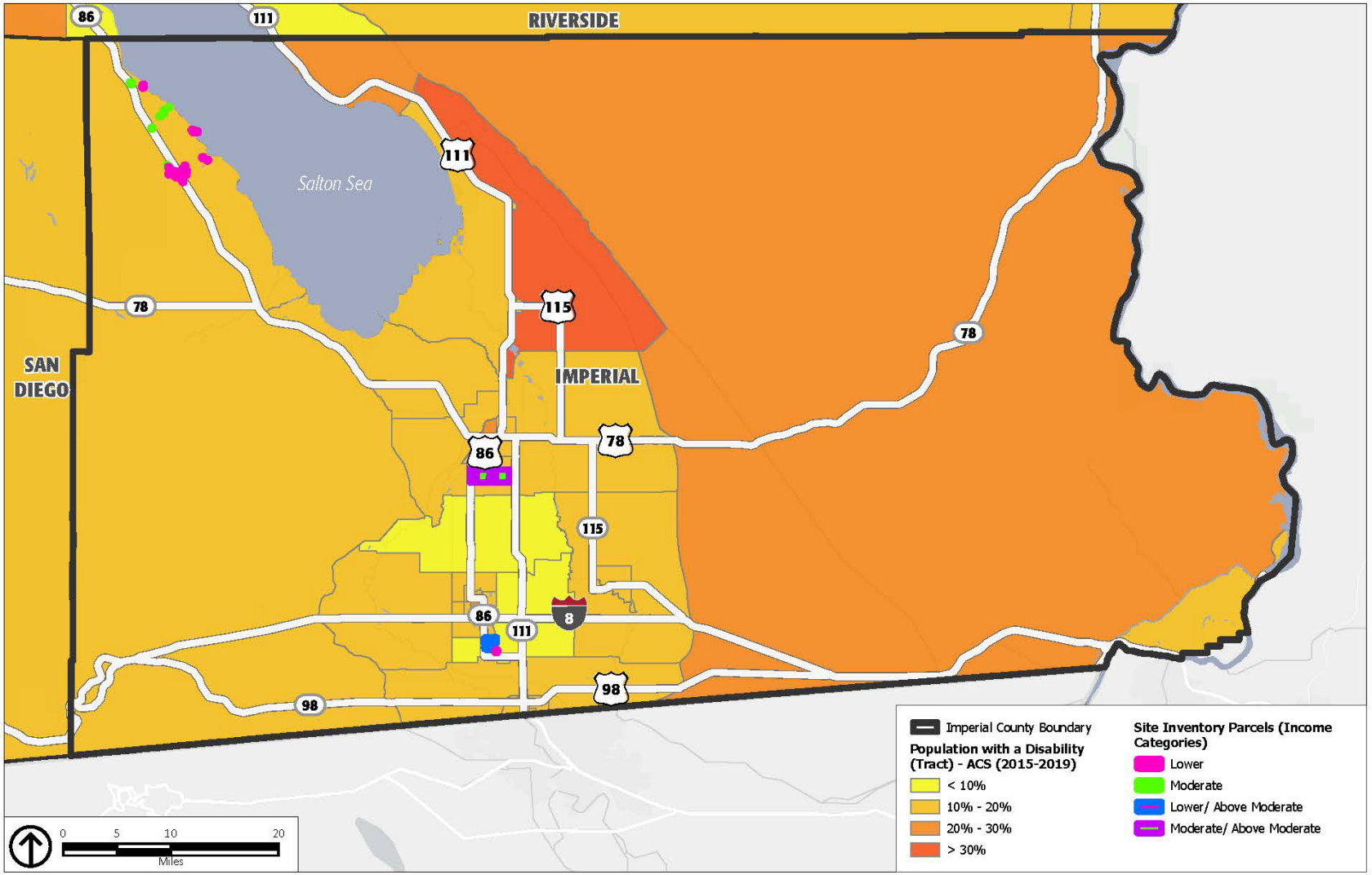
Source: ACS 5-year estimate (2015-2019), by block group.

FIGURE B-6
SITES INVENTORY AND PERCENT FEMALE-HEADED HOUSEHOLDS WITH CHILDREN



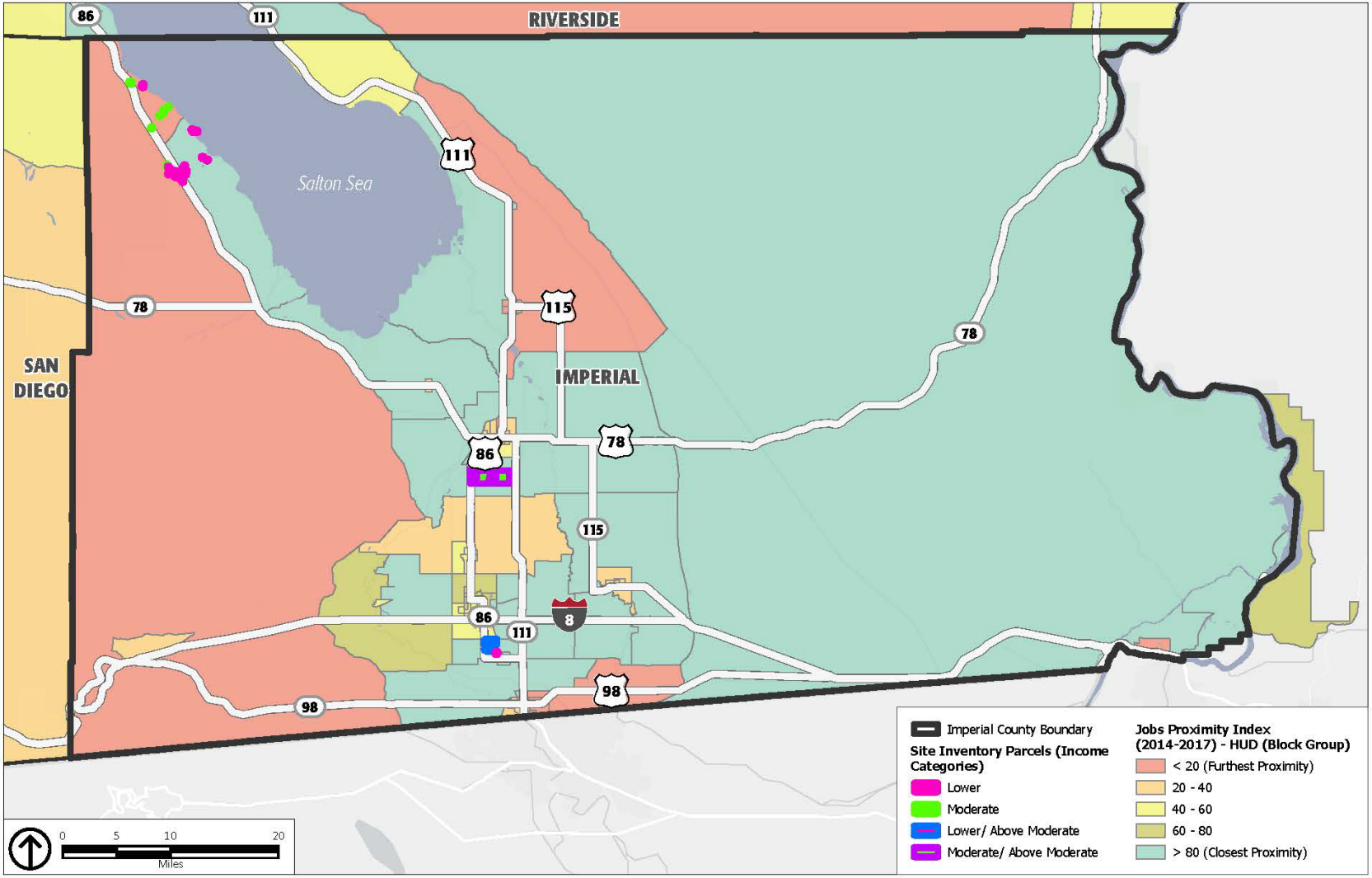
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-7
SITES INVENTORY AND PERCENT OF POPULATION WITH A DISABILITY



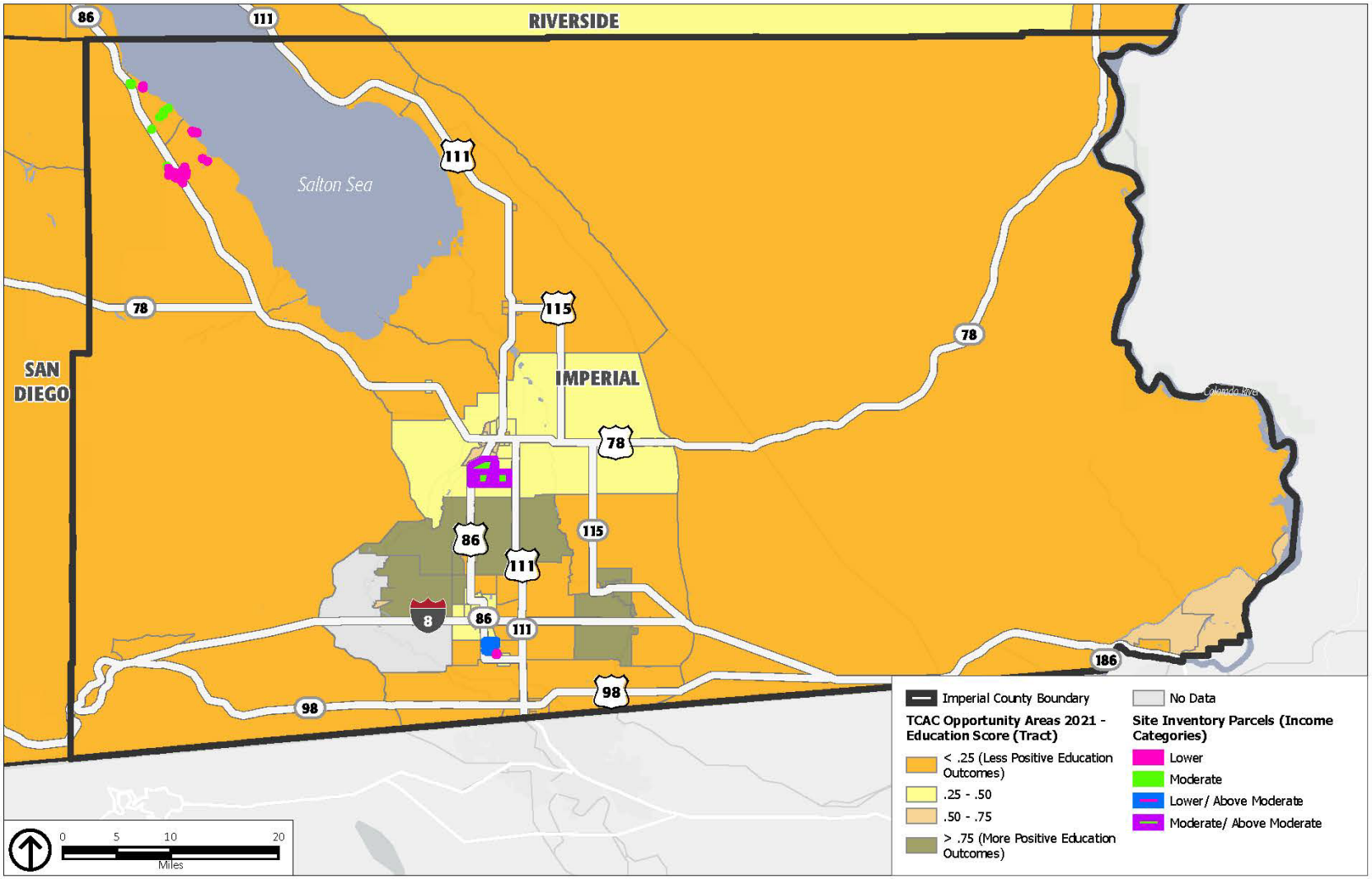
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-8
SITES INVENTORY AND JOB PROXIMITY INDEX (2014-2017)



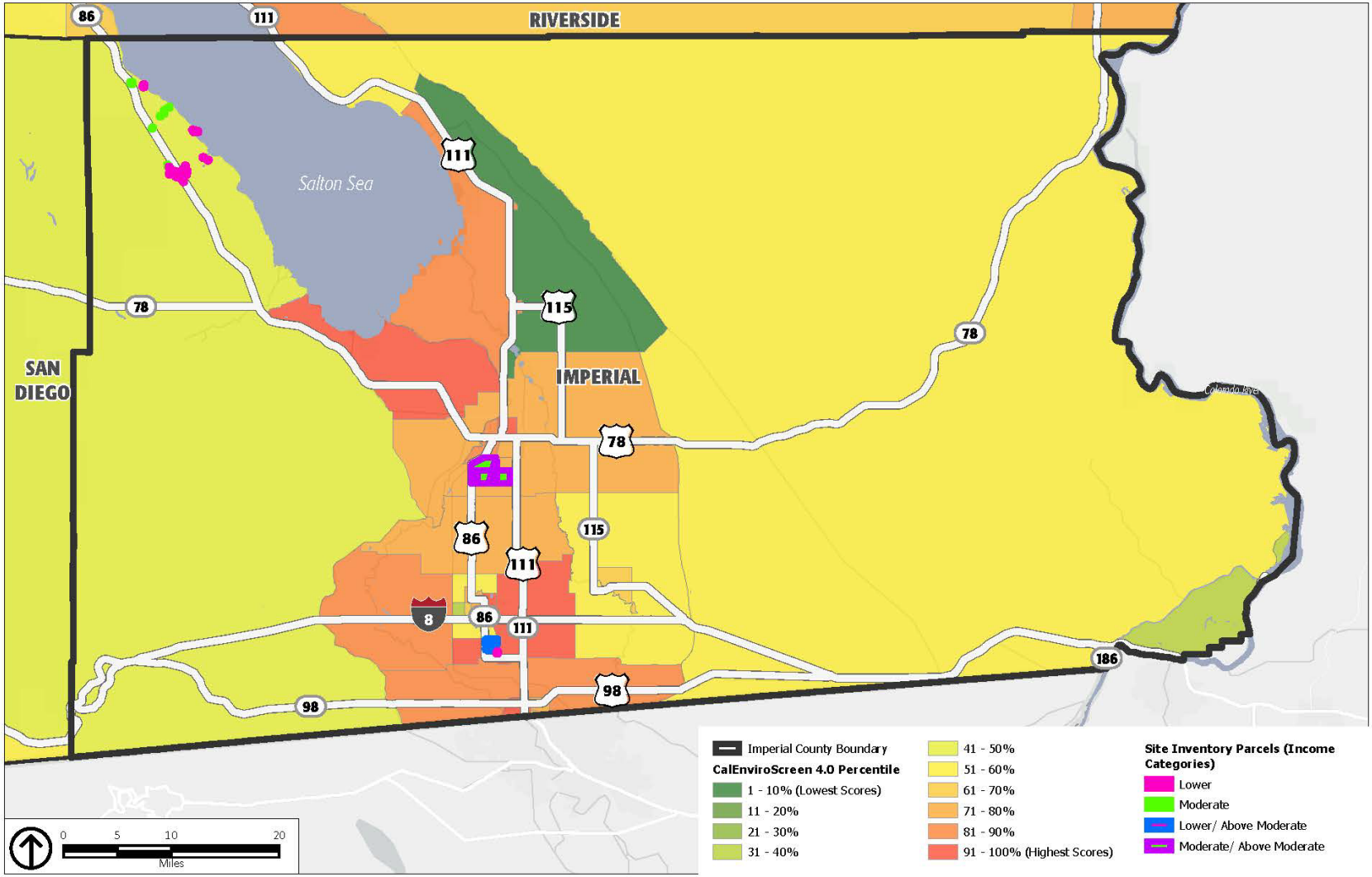
Source: HUD 2014-2017.

FIGURE B-9
SITES INVENTORY AND TCAC/HCD EDUCATION SCORE



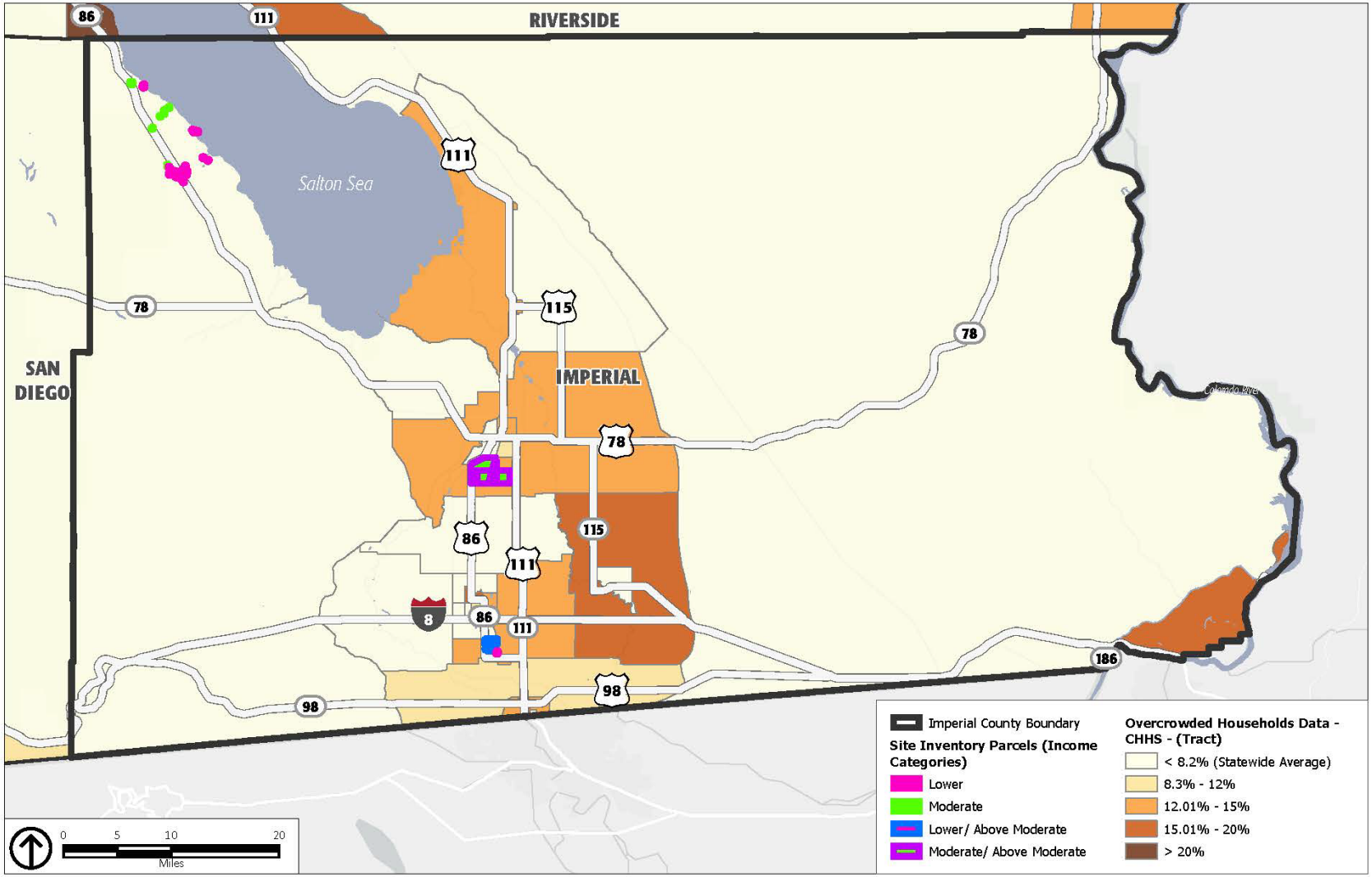
Source: TCAC/HCD, 2021.

FIGURE B-10
SITES INVENTORY AND ENVIRONMENTAL CONDITIONS



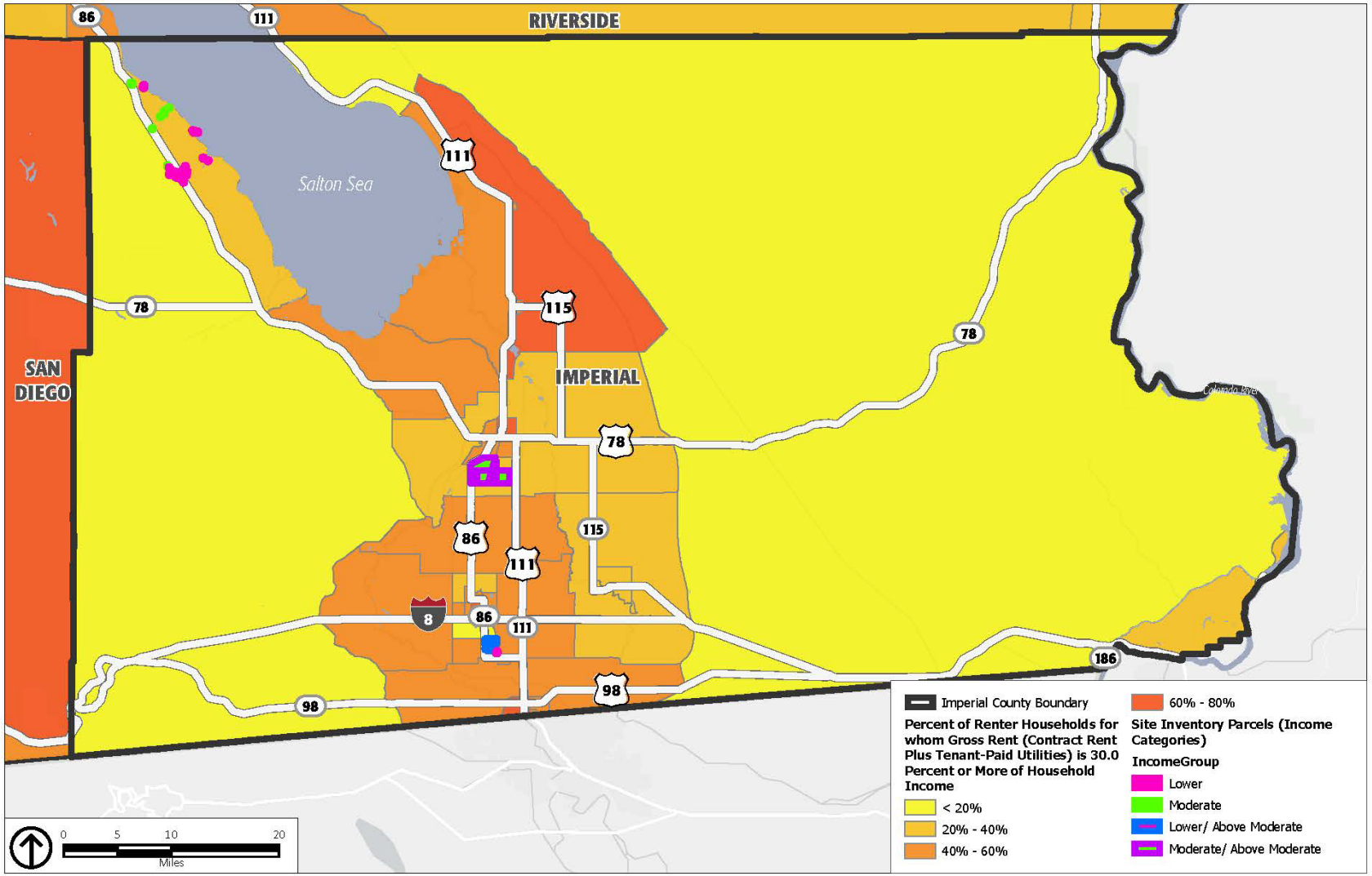
Source: TCAC/HCD, 2021.

FIGURE B-11
SITES INVENTORY AND OVERCROWDED HOUSEHOLDS



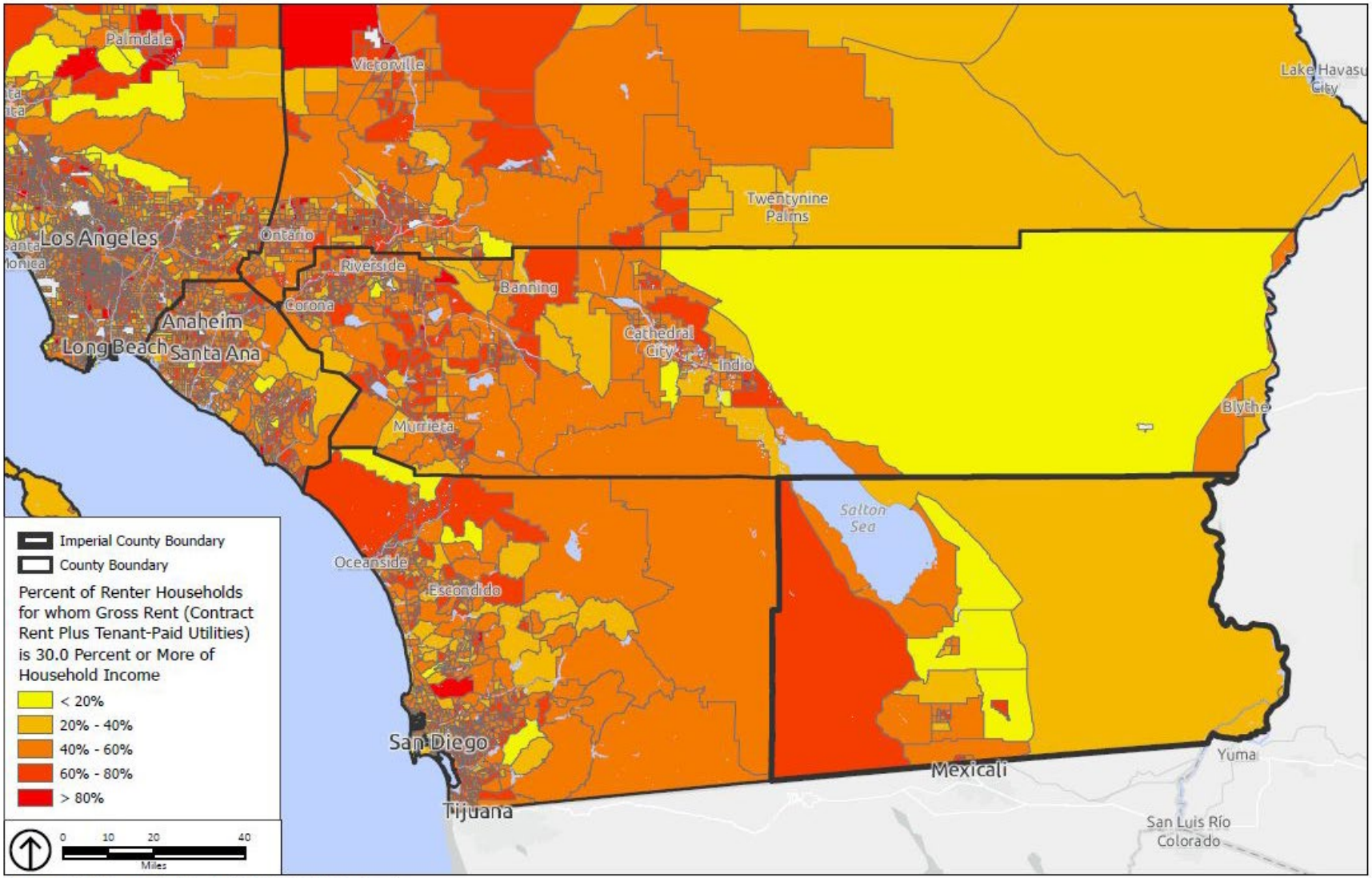
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-12
SITES INVENTORY AND OVERPAYMENT BY RENTERS (2015-2019)



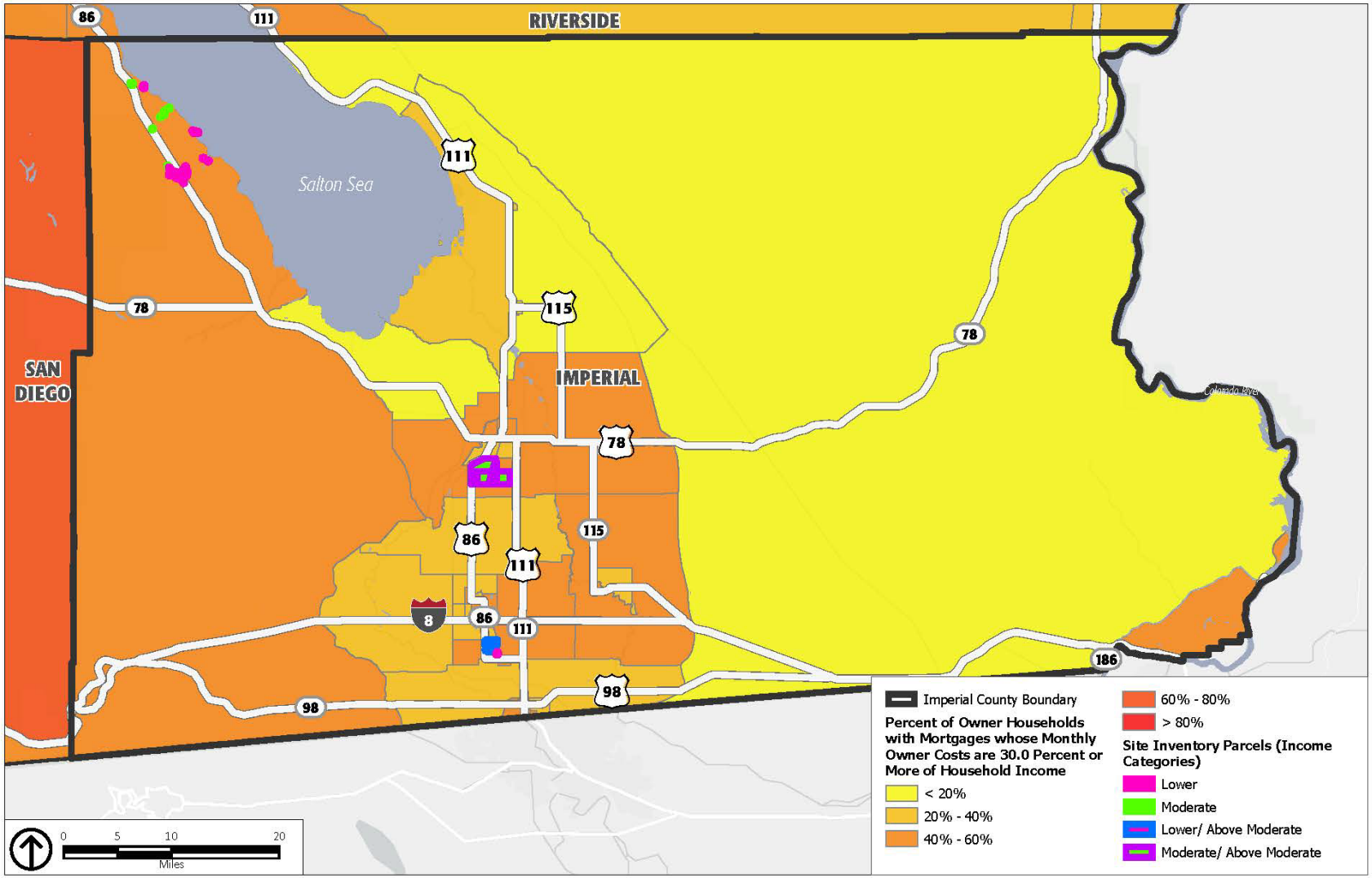
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-13
OVERPAYMENT BY RENTERS (2010-2014)



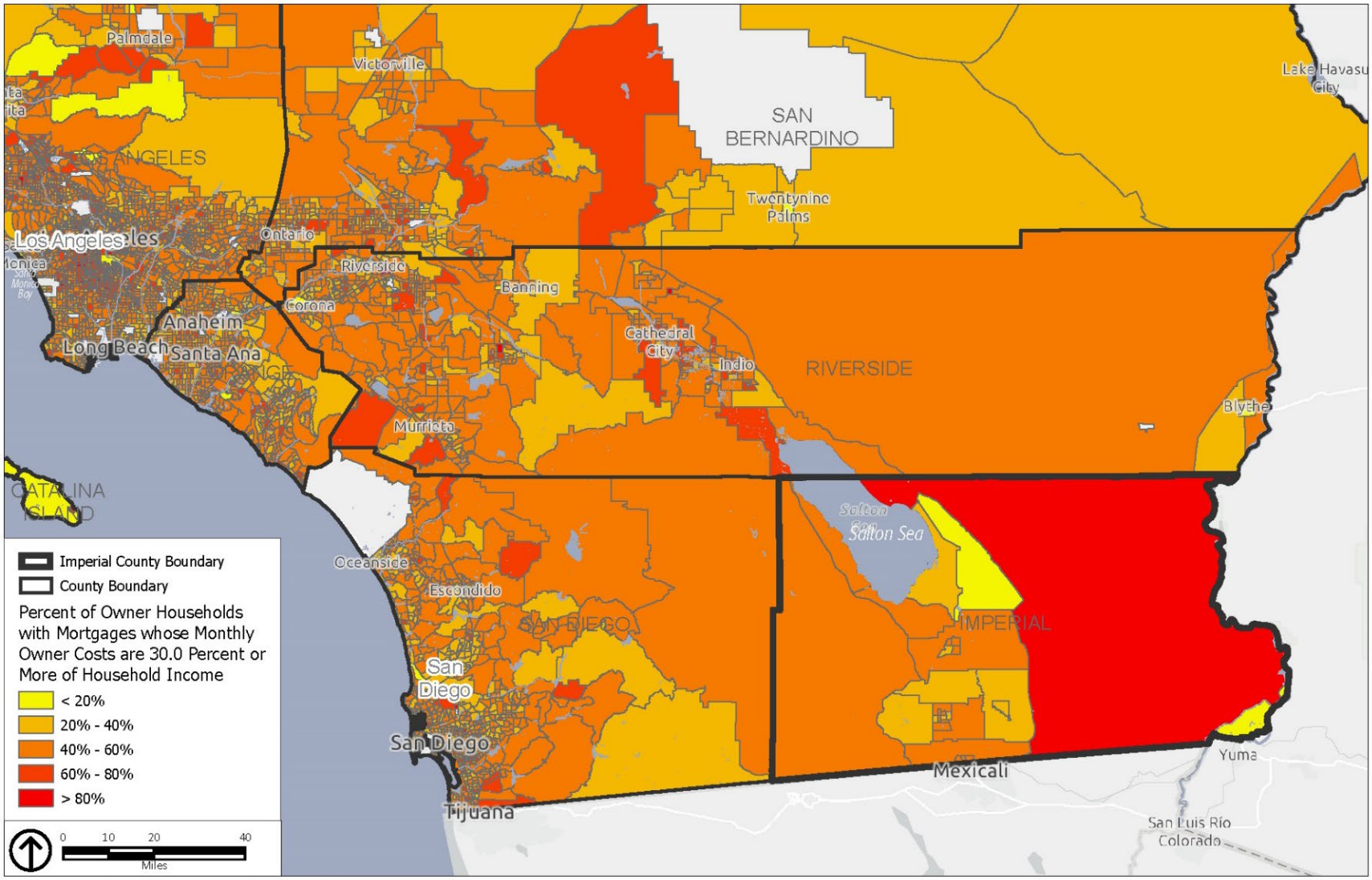
Source: ACS 5-year estimate (2010-2014), by tract.

FIGURE B-14
SITES INVENTORY AND OVERPAYMENT BY HOMEOWNERS (2015-2019)



Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-15
OVERPAYMENT BY HOMEOWNERS (2010–2014)



Source: ACS 5-year estimate (2010-2014), by tract.

Appendix C: Adequate Sites Map

FIGURE C-1
HOUSING SITES INVENTORY, COUNTYWIDE

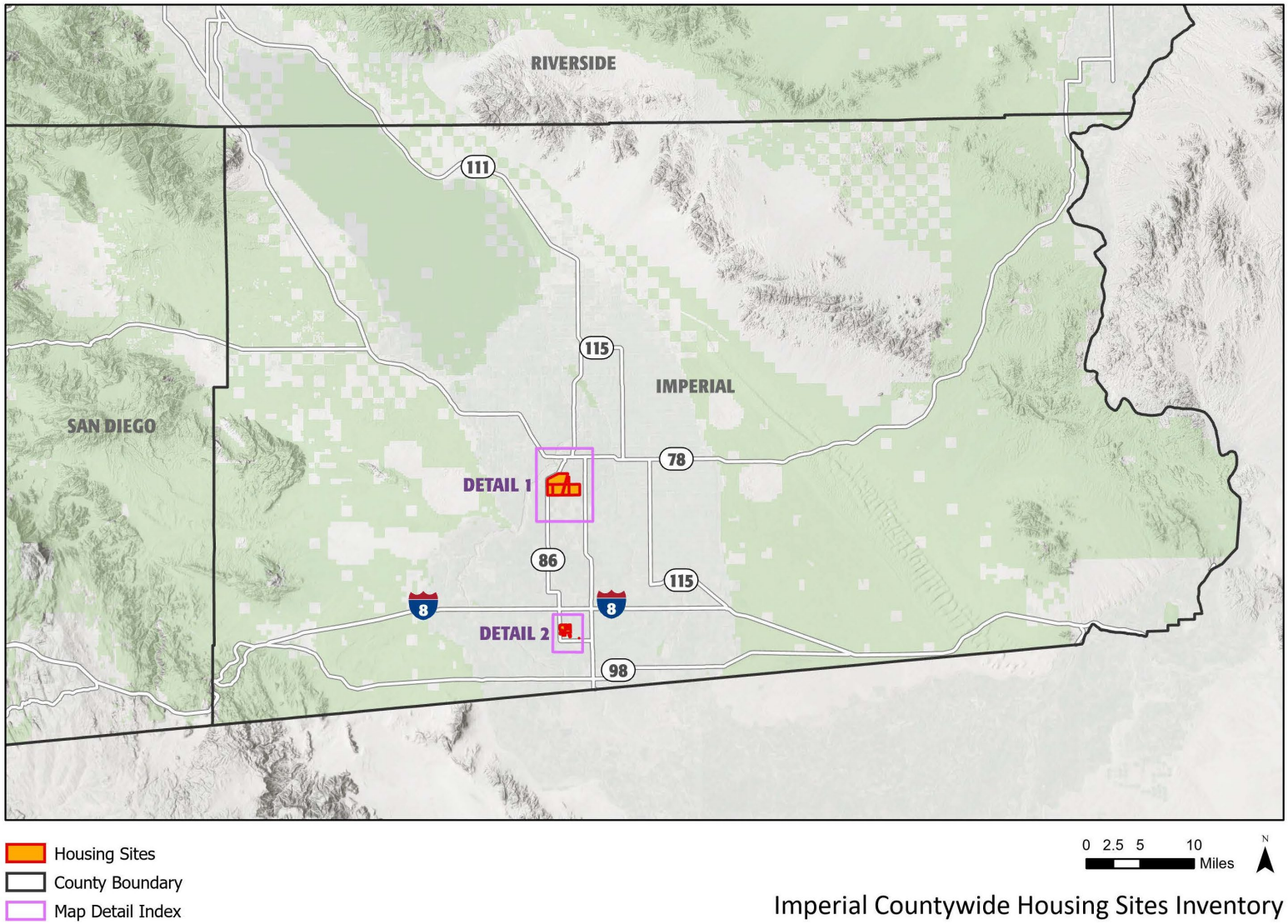
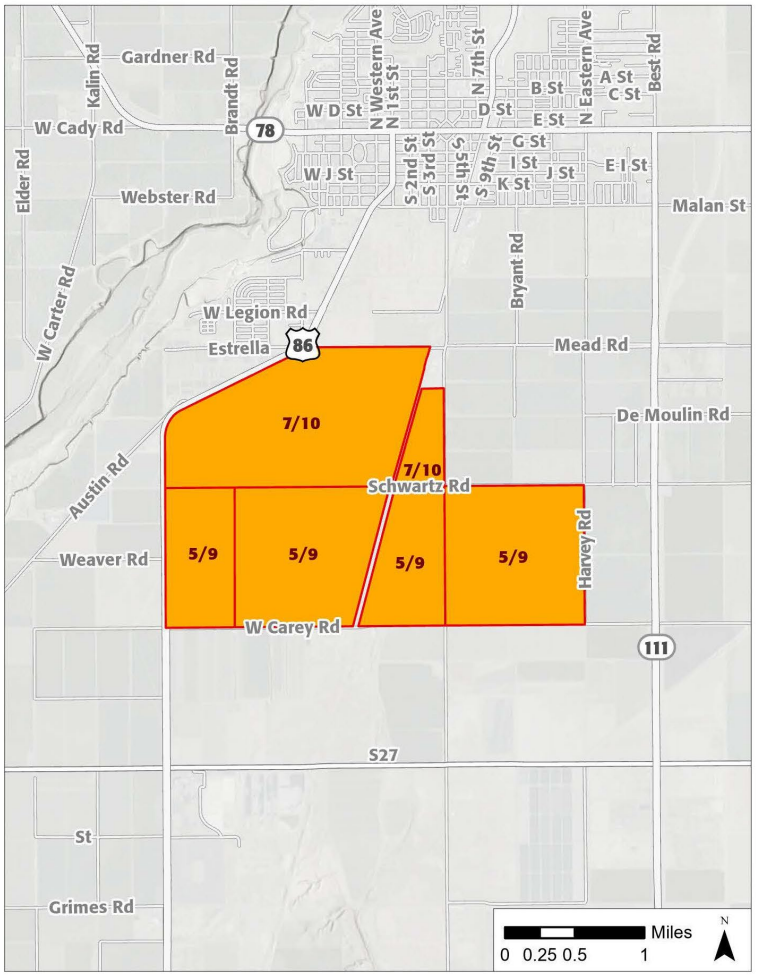
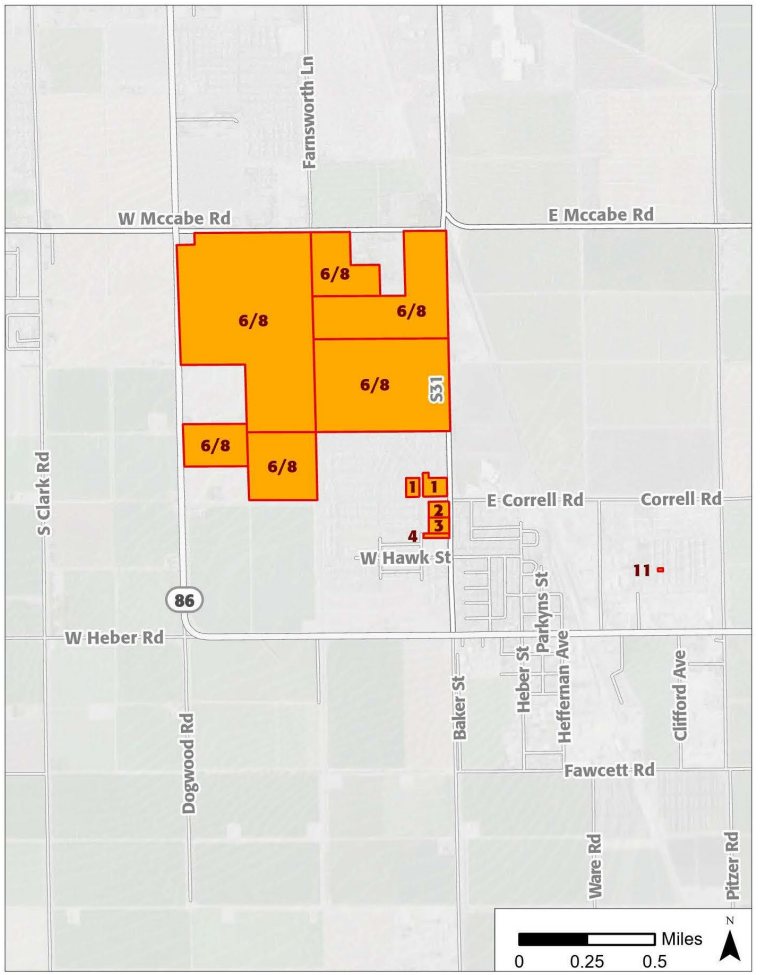


FIGURE C-2
HOUSING SITES INVENTORY



Available Housing Sites- Detail 1



Available Housing Sites- Detail 2

Appendix D: Glossary of Terms

The following definitions are commonly used terms in the Housing Element:

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

Accessory Dwelling Unit: A dwelling unit that is a separate living quarter from the principal dwelling unit and has its own kitchen and bathroom. Also referred to as "granny" or "in-law apartments."

Affordability: Annual housing costs are considered affordable when they do not exceed 30 percent of gross annual household income. For homeowners, this cost includes principal and interest payments. For renters, this includes monthly rent and utilities.

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

Affordable Housing: Refers to the relationship between the price of housing in a region (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: 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: Existing subsidized below-market-rate rental housing units that are threatened with conversion to market-rate rents because of the impending termination of use restrictions due to expiration or non-renewal of subsidy arrangements.

Below-Market-Rate (BMR) Unit: 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.

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 objective of the CDBG program is to facilitate 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 US Department of Housing and Urban Development's Shelter Plus Care, Section 8 Moderate Rehabilitation Single-Room Occupancy Dwellings (SRO) Program, and Supportive Housing Program (US House Bill 2163).

Decennial Census: Every ten years, the US 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 US 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 is 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: The number of housing units on a unit of land (e.g., 10 units per acre).

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

Development Impact Fee: 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 landowner 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.

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 the 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 paid back over a specified period.

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 multi-family structures. Vacation or second homes and rental properties are also included.

Elderly Units: Specific units in a development restricted to residents over a certain age (as young as 55 years). 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 (per Health and Safety Code 50801): Housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay

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

Entitlement City: A city, which based on its population, is entitled to receive funding directly from HUD. Examples of entitlement programs include CDBG, HOME, and ESG.

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): 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.

Family Households: A household in which the householder lives with one or more individuals related to him or her by birth, marriage, or adoption.

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.

Fannie Mae: Established in 1938 by the federal government and becoming a private company in 1968, Fannie Mae operates under a congressional charter that directs it to channel their efforts into increasing the availability and affordability of homeownership for low-, moderate-, and middle-income Americans. Fannie Mae receives no government funding or backing and is one of the nation's largest taxpayers. Fannie Mae does not lend money directly to homebuyers. Instead, it works with lenders to make sure they don't run out of mortgage funds, so more people can achieve their goal of homeownership.

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

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

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: A legal document, adopted by the legislative body of a city or county, setting forth policies regarding long-term development.

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

Habitable (room): 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: 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.

Handicap 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.

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 US 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 were two important changes to the Hispanic origin question for Census 2000. First, the sequence of the race and Hispanic origin questions for Census 2000 differed 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 (US 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.

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

HUD: The United States Department of Housing and Urban Development is a 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, which are determined by the median household income at the local level.

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

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.

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

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.

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.

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 childcare. There are nine titles under the McKinney-Vento Act that are administered by several different federal agencies, including the US Department of Housing and Urban Development (HUD). McKinney-Vento Act Programs administered by HUD include the 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 (US House Bill 2163).

Median Income: 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) occurring on the same lot or in close proximity to each other. Cities and counties 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): A Federal Income Tax Credit Program. An MCC increases the loan amount for which an applicant qualifies and it increases an applicant's take-home pay. The MCC entitles applicants to take a federal income tax credit of 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.

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 (US 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 (US 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 (US House Bill 2163).

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 US Department of Housing and Urban Development (HUD) administers federal aid to local housing agencies 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 percent 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 US Department of Agriculture's Rural Development. The RHA offers financial aid to low-income residents of rural areas.

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 Imperial Valley 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.

Single-Room Occupancy Dwelling (SRO): 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 healthcare facilities.

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.

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

Supportive Housing (per Health and Safety Code 50675.14(b)): Housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260 and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

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.

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.

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 guarantee 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 (US House Bill 2163).

Workforce Housing: Refers to housing that is meant for residents earning 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, police officers, and other public employees.

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 "capital" 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.

US Census Terms

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

Own Children: Sons and daughters, including stepchildren and adopted children, of the householder. Similarly, "own" children in a subfamily are sons and daughters of the married couple or parent in the subfamily. (All children shown as members of related subfamilies are own children of the person(s) maintaining the subfamily.) For each type of family unit identified in the CPS, the count of "own children under 18 years old" is limited to never-married children; however, "own children under 25"and "own children of any age," as the terms are used here, include all children regardless of marital status. The counts include never-married children living away from home in college dormitories.

Related Children: Includes all people in a household under the age of 18, regardless of marital status, who are related to the householder. It does not include the householder's spouse or foster children, regardless of age.

Ethnic Origin: People of Hispanic origin were identified by a question that asked for self-identification of the persons' origin or descent. Respondents were asked to select their origin (and the origin of other household members) from a "flash card" listing ethnic origins. People of Hispanic origin in particular, were those who indicated that their origin was Mexican, Puerto Rican, Cuban, Central or South American, or some other Hispanic origin. Note that people of Hispanic origin may be of any race.

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 Size: Refers to the number of people in a family.

Family Type: Refers to 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."

Household: A household includes all the people who occupy a housing unit as their usual place of residence.

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.

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.

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

Household Type and Relationship: Households are classified 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.

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.

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 has incomes below the median.

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 one person per room.

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

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, 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 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.

Race: The race of individuals was identified by a question that asked for self- identification of the person's race. Respondents were asked to select their race from a "flashcard" listing racial groups.

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

Single-Family Attached Housing: 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 nonresidential structures.

Single-Family Detached Home: 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.

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 (per Health and Safety Code 50675.2(h)): Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

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 do share a floor/ceiling.

Unemployed: 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 four 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 percentage.

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. In determining the number of units in a structure, all housing units, both occupied and vacant, are counted.

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.

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.

White: In decennial census data, the White category includes persons having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicate their race as ''White'' or report entries such as Irish, German, Italian, Lebanese, Near Easterner, Arab, or Polish. The "alone" designation, as used with decennial census data, indicates that the person reported only one race.

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 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.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I. Introduction

The Housing Element of the General Plan is a comprehensive assessment of current and future housing needs in Imperial County and proposed actions to facilitate the provision of housing to meet those needs for households of all income levels. Policies contained in this element are an expression of the statewide housing priority to allow for the "attainment of decent housing and a suitable living environment for every Californian," as well as a reflection of the unique needs and concerns of the Imperial County community.

The purpose of this Housing Element is to identify and establish the County's policies with respect to meeting the needs of existing and future residents in Imperial County. It establishes policies that will guide County decision-making and sets forth an action plan to implement its housing goals over the next eight years. The commitments are in furtherance of the statewide housing priority as well as a reflection of the concerns unique to Imperial County.

Housing Element Requirements

California Government Code Section 65583 requires the Housing Element to include the following components:

- A review of the previous element's goals, policies, programs, and objectives to ascertain the effectiveness of each of these components, as well as the overall effectiveness of the Housing Element.
- An assessment of housing needs and an inventory of resources and constraints related to meeting these needs.
- An analysis and program for preserving assisted housing developments.
- A statement of community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.
- A program that sets forth an eight-year planning period schedule of actions that the County is undertaking, or intends to undertake, in implementing the policies set forth in the Housing Element.

Housing Element Organization

This Housing Element is organized into the following sections:

- Introduction: This section provides information on the State of California's requirements, the purpose of the Housing Element, the organization of the document, and General Plan consistency.
- Review of Previous Housing Element: This section contains an evaluation of the prior Housing Element and its accomplishments and analyzes differences between what was projected and what was achieved.

- Goals, Policies, and Programs: This section sets forth the County's goals, policies, and programs that are designed to address the housing needs in Imperial County. Based on the findings of all of the previous sections, the Goals, Policies, and Programs section identifies actions the County will take to meet local housing goals, quantified objectives, and address the housing needs in Imperial County.
- Public Participation: Describes the opportunities the County provided for public participation during the preparation of the updated Housing Element.

Appendix A is organized into the following sections:

- Housing Needs Assessment: This section focuses on demographic information, including population trends, ethnicity, age, household composition, income, employment, housing characteristics, housing needs by income, and housing needs for special segments of the population. This section also outlines the characteristics of the community and identifies those characteristics that may impact housing need and availability.
- Housing Resources and Opportunities: This section describes the County's housing resources, historic development patterns, and housing opportunities as well as the County's existing housing stock and the potential areas for future housing development. This section also discusses opportunities for energy conservation, which can reduce costs to homeowners and infrastructure costs to the County. With a reduction in basic living costs through energy savings, more households may be able to afford adequate housing.
- Housing Constraints: This section analyzes potential governmental and non-governmental constraints to housing development in Imperial County. This includes the County's planning, zoning, and building standards that directly affect residential development patterns as well as influence housing availability and affordability. Potential non-governmental constraints include the availability and cost of financing, the price of land, and the materials for building homes, as well as natural conditions that affect the cost of preparing and developing land for housing, and the business decisions of individuals and organizations (some examples are home building, finance, real estate, and rental housing that impact housing cost and availability).

II. Review of Previous Housing Element

The 2014-2021 Housing Element included goals, policies, and programs intended to produce an adequate supply of safe and affordable housing for residents of unincorporated Imperial County. The Review of the previous Housing Element describes the County's progress in implementing each Housing Element. The discussion considers the effectiveness of each program and the appropriateness of continuing the program through the new planning cycle.

As detailed in the table, the County made significant progress in facilitating the development of housing to meet the needs of households of all socioeconomic levels through the adoption of several Specific Plans that call for new housing in a wide variety of types and densities.

Efforts to Address Special Housing Needs

Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs. As shown in the Review of Previous Housing Element matrix on page 4, the 2014-2021 Housing Element included several programs that addressed senior housing needs, emergency shelters, and needs for persons with disabilities. Some of the accomplishments are highlighted below:

- The County provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care.
- The County provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones.
- The County worked with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to identify suitable sites for development of new transitional and supportive housing.
- The County provides informational materials on local service organizations, homeless and community assistance programs, and emergency shelters and transitional housing.
- The County provided hotel vouchers to 27 households for temporary shelter assistance through the HEAP Rapid Re-Housing program.
- The County facilitated a lot merger for an emergency shelter at a fire facilities in Seeley.
- The County approved the issuance of bonds by the California Municipal Finance Authority for the benefit of the Heber del Sol Family Apartments affordable multifamily project permitted by the County.

Program		Implementation Status	Action
Program 1.1.1 Maintain a land inventory of all government and publicly owned surplus sites (including state and federally owned land) in the county that have potential for residential development for extremely low-, very low-, low-, and moderate-income households.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds (staff time) Timetable: Update annually	The County Executive Office maintains a list of all land owned by the County, including land suitable for residential and non-residential uses.	Modified. Covered under new program 1.
Program 1.1.2 The County will provide technical assistance to developers in accessing local, state, and federal funding for affordable housing by: (1) applying for such funding on behalf of affordable housing developers; or (2) providing technical assistance or documentation necessary to support applications for funding by affordable housing developers upon request. Technical assistance will include, but not be limited to: • Provision of data or documents within the County's possession that will contain necessary information to assist in the preparation of a successful grant application, • Letter of support (for projects that have received permit approvals by the County), and • Assistance from the County's staff to locate potential sources of matching funds.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Update annually and ongoing, as needed	The Imperial County Workforce and Economic Department (ICWED) plans to submit a technical assistance application for an update to the Colonias Master Plan in 2021.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 1.1.3 Utilize adequate sites inventory and housing condition survey results to support new construction of housing affordable to extremely low-, very low-, and low-income persons by designating sites in the unincorporated area of the County that are appropriate for affordable housing types, including emergency shelters, transitional housing, mobile homes, multifamily housing types, and farmworker housing.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Review annually, support ongoing	In January 2020, the County Board of Supervisors approved the issuance of bonds by the California Municipal Finance Authority for the benefit of the Heber del Sol Family Apartments affordable multifamily project permitted by the County. The project is planned for 47 income-restricted units and one unrestricted manager's unit in the Heber community and is funded by state and federal Low-Income Housing Tax Credit (LIHTC) funds. The County allowed parking reductions for this project. Construction was expected to begin in June 2020 but has been delayed due to the COVID-19 pandemic.	Modified. Covered under new program 1.
Program 1.1.4 Continue to allow the development of manufactured housing and mobile homes in the R1, R-2, R-3, R-4, A-1, A-2, A-3, S-1, and S-2 zones.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County allows the development of manufactured and mobile homes in the R-1, R-2, R-3 (i.e. duplex), R-4, A-1, A-2, A-3, C-1, C-2, C-3 (i.e. mobile home park), S-1, and S-2 zones. During the planning period (2014-2021), the County permitted 32 mobile homes on private lots and 106 mobile homes in parks.	Completed. Delete.
Program 1.1.5 Continue to ensure appropriate zoning that allows for medium- and high-density housing for extremely low-, very low-, low-, and moderate-income housing throughout the unincorporated County.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	High-density zones (R-3, R-4) allow up to 29 units per acre, suitable for medium- and high-density housing for lower-income and moderate-income housing. The Heber del Sol Family Apartments were permitted for 48 units, 47 of which will be affordable to low-income households, in the R-3 zone. One other multifamily duplex was permitted in 2016 with no affordability restrictions. Due to market conditions, development in the County during the previous planning period was primarily	Modified. Covered under new program 1.

Program		Implementation Status	Action
		mobile homes (138 total) and single-family units (19 total), despite the availability of appropriately zoned land for medium- and high-density housing.	
Program 1.1.6 Continue to encourage Planned Developments through the Specific Plan development agreement process to achieve innovative housing designs.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	No Specific Plans were approved during the previous planning period. The owners of the McCabe Ranch II, Rancho Los Lagos, and 101 Ranch approved Specific Plans have not developed the projects. The County has worked with the owners to grant map extensions for those needed to encourage development.	Continue. New program 3.
Program 1.1.7 Continue to allow the development of housing for farmworkers in the A-2, A-3, AM-1, and AM-2 zones.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The A-2, A-3, and AM-1 zones allow a single-family unit by right, and farm labor housing with a conditional-use permit, with no limitations on the number of units. The AM-2 zone allows a single-family unit, accessory dwelling unit (ADU) incidental to the primary use, and farm labor housing by right.	Completed. Delete.
Program 1.1.8 To ensure continued compliance with the Employee Housing Act, especially California Health and Safety Code Sections 17021.5 and 17021.6, the County has set forth the following conditions for affordable housing: • Employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation. • For the purpose of all local ordinances,	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County lists employee housing in Division 5 and defines it in the 2014-2021 Housing Element. The Zoning Code refers to employee housing as farm labor housing, meeting the needs of the same population. The A-2, A-3, and AM-1 zones allow farm labor housing with a conditional-use permit and the AM-2 zone allows farm labor housing by right.	Continue. Covered under new program 7.

Program		Implementation Status	Action
employee housing shall not be included within the definition of a boarding house, rooming house, hotel, dormitory, or other term that implies the employee housing is a business run for profit or differs in any other way from a family dwelling. • The use of a family dwelling for purposes of employee housing serving six or fewer persons shall not constitute a change of occupancy. • The review will ensure consistency with the following concerning employee housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household. • Employee housing shall not be deemed a use that implies that the employee housing is an activity that differs in any other way from an agricultural use. • No conditional-use permit, zoning variance, or other zoning clearance shall be required of this employee housing that is not required of any other agricultural activity in the same zone. • The permitted occupancy in employee housing in an agricultural zone shall include agricultural employees who do not work on the property where the employee housing is located.			
Program 2.1.1 Continue to support the efforts of the Imperial Valley Housing Authority by	Responsible Agency: Planning and Development Services	The County continues to support Imperial Valley Housing Authority. The Planning and	Modified. Covered

Program		Implementation Status	Action
providing technical assistance in funding acquisition and the construction of affordable housing units by assisting them with developing innovative and cost-effective construction methods, including the use of solar energy, xeriscaping, and green building materials.	Department, Imperial Valley Housing Authority Funding Source: Grant funds, General Funds (staff time) Timetable: Review coordinated efforts annually, support ongoing	Development Services offers technical assistance in applying for funding and incentives for high density affordable housing. While no new affordable units were constructed or acquired by the Housing Authority during the previous planning period, the County is committed to supporting this work and has included more specific strategies in the 6th cycle programs.	under new program 4.
Program 2.2.1 Encourage innovative and cost-effective construction methods to reduce housing costs by providing incentives such as density bonus units, reduction in development standards, fee waivers/deferrals, and providing assistance in accessing state and federal subsidies. The County will also continue to contract with outside firms to perform plan check reviews for more complex projects in an effort to provide timely development approvals.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 5, Section 90305.00 of the County's Land Use Ordinance provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. No projects requested density bonuses in the previous planning period.	Modified. Covered under new program 4.
Program 2.2.2 The County will promote the use of density bonuses for lower-income units by including information about density bonus units and related incentives on the County's updated website.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time)	Density bonus provisions are listed in Division 3, Chapter 5, Section 90305.0 of the County's Land Use Ordinance. The code provides density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A	Modified. Covered under new program 6.

Program		Implementation Status	Action
	Timetable: Ongoing	density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. The County will promote the use of density bonuses by listing these requirements and opportunities on the County's website.	
Program 2.2.3 Increase the supply of affordable housing for special-needs groups by encouraging the development of attached or detached second dwelling units on existing residential lots by providing information to homeowners about second units at the Planning and Development Services Department offices.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County works closely with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to pursue opportunities for development of new transitional and supportive housing, as well as other housing types for special-needs group. The County and these groups have identified suitable sites, but none have been developed. Additionally, County approved seven accessory dwelling units (ADU)'s and one Junior ADU in 2020.	Modified. Covered under new program 8.
Program 2.2.4 Continue to monitor State Density Bonus law to ensure the County's ordinance is in compliance with state regulations.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Annually	Chapter 5, Section 90305.00, of the County's Land Use Ordinance provides for density bonuses for qualified low-income, very low-income, or elderly housing projects in the R-1, R-2, and R-3 zones if central water and central sewer are provided as part of the project. A density bonus of up to 20 percent may be allowed for qualified residential projects, as described previously. A density bonus of 25 percent may be granted for qualified residential	Combined with Program 2.2.2. Covered under new program 6.

Program		Implementation Status	Action
		projects of 5 or more units within which as least 25 percent of the units are affordable to low- or moderate-income households and/or 10 percent of the units are affordable to lower-income households. The County will update the density bonus in the Code to reflect current State law.	
Program 2.2.5 Allow for the development of mixed-use zoning in the Light Commercial (C-1) and General Commercial (C-2) zoning districts that allow for residential development at up to 29 dwelling units per acre.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 6, Section 90306.01, of Division 3 of the County's Land Use Ordinance establishes the C-1 (Light Commercial) and C-2 (General Commercial) zones as allowing mixed-use development and discourages single-use development. The C-1 zone permits 29 dwelling units per acre and C-2 does not establish a maximum number of allowable dwelling units.	Completed. Delete.
Program 2.2.6 Continue to support the use of federal and state funding resources for meeting local housing needs and programs, especially for households with specials needs, particularly seniors and those with disabilities and development disabilities, and lower incomes.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	In 2021, Workforce and Economic Development provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care. Workforce and Economic Development provided TBRA between 2017 and 2018 and served a total of 150 households. Of the 150 assisted households, 50 were served through the HEAP program in 2020. The County will continue to apply for available funding to meet the needs of the community and plans to submit additional funding	Modified. Covered under new program 9.

Program		Implementation Status	Action
		applications for Community Development Block Grant (CDBG) in early 2021.	
Program 2.2.7 Continue to seek funding from the Joe Serna Jr. Farmworker Housing Grant Program (Serna) for the rehabilitation of existing farmworker units and the construction of new units. The County will also collaborate with agricultural employers to identify sites and funding sources available through the California Department of Housing and Community Development (HCD) and the United States Department of Agriculture (USDA) Rural Development programs for farmworker housing.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds, Serna, CDBG Timetable: As Notices of Funding Availability (NOFAs) are released	Due to limited staff capacity, the County has not applied for funding through the Joe Serna Jr. Farmworker Housing Grant Program or other funding for farmworker housing. As farmworkers are an integral part of the County's community and economy, this program will be strengthened to identify funding during the 2021-2029 planning period.	Modified. Covered under new program 10.
Program 2.2.8 Continue to promote development of assisted rental housing for extremely low-, very low-, low-, and moderate-income persons and families through below-market rate financing through private lenders and possibly with the use of tax-exempt Mortgage Revenue Bonds by providing technical assistance with funding applications and other necessary paperwork.	Responsible Agency: Planning and Development Services Department Funding Source: California Housing Finance Agency (CHFA) Timetable: Ongoing	The County responds to requests for information and assistance on a project-by-project basis for affordable rental housing. Additionally, the County encourages development of housing for lower-income households through density bonus incentives and coordination with the Board of Supervisors and housing providers. However, no projects requested financing or technical assistance during the previous planning period.	Modified. Covered under new program 12.
Program 2.2.9 Continue to support self-help housing providers to develop affordable homeownership projects for lower-income households and especially agricultural workers by providing technical assistance with funding applications and other paperwork, as well as by helping self-help housing providers secure sites for their developments.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	The County responds to requests for information and assistance on a project-by-project basis from self-help housing providers for affordable homeownership projects. No questions were received for affordable homeownership projects proposed during the previous planning period.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 2.2.10 The County will assist and support local social service agencies in their applications for state and federal funds to provide housing-related services to lower-income households and special-needs groups, particularly those offering supportive housing programs for homeless individuals and families.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing or as requested	In 2021, Workforce and Economic Development provided Emergency Rapid Rehousing and Tenant-Based Rental Assistance (TBRA) to homeless clientele through the Homeless Emergency Assistance Program (HEAP) funding through federal funds obtained by the local Continuum of Care. Workforce and Economic Development is also in the process of preparing to implement a TBRA program, funded by HCD - HOME and two Housing Rehabilitation Programs funded by HCD – CDBG. Subsistence payments funding was awarded through the 16-CDBG-11151 grant. The County began implementation on March 9, 2017, and the program was completed on February 13, 2019. A total of 20 households were assisted.	Modified. Covered under new program 11.
Program 3.1.1 Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services Department offices.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Review information and update quarterly, distribution ongoing	Flyers and pamphlets with information on local service organizations, homeless and community assistance programs, and emergency shelters and transitional housing are available in all County offices.	Continue. New program 13.
Program 3.1.2 Assist emergency shelters/transitional housing providers in	Responsible Agency: Planning and Development Services Department	The County Workforce and Economic Development, working closely with the Department of Social Services, implemented the	Modified. Covered

Program		Implementation Status	Action
acquiring state, federal, and local funding for services for the homeless.	**Funding Source**: General Funds (staff time) **Timetable**: Ongoing	rapid rehousing program under HEAP, which provides temporary shelter assistance though hotel vouchers. A total of 27 households have received hotel vouchers through the HEAP IC Rapid Re-Housing program. Vouchers ranged from 7-day to 90-day vouchers.	under new program 14.
Program 3.1.3 The County will continue to allow for the development of transitional housing, and per Section 50675.14 of the Health and Safety Code, continue to allow supportive housing as a permitted use in residential districts.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Transitional housing is currently a permitted use in the R-3, C-2, A-1, and M-1 zones. The County will update Title 9 to allow transitional housing in all zones where residential uses are permitted.	Modified. Covered under new program 15.
Program 3.1.4 Pursuant to Senate Bill 2, continue to allow emergency shelters as a permitted use in the General Commercial (C-2) and Light Industrial (M- 1) zones in the County Land Use Ordinance Title 9.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Emergency shelters are permitted by right in the C-2 (Medium Commercial) and M-1 (Light Industrial) zones and with a Conditional Use Permit in the A-1 zone. The County received a Lot Merger proposal for the development of a Fire Facility in Seeley with an emergency shelter to be used in lieu of the apparatus room when temperatures reach high levels.	Completed. Delete.
Program 3.1.5 Ensure new developments are compliant with standards outlined in the Americans with Disabilities Act (ADA) for persons with disabilities.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time)	Chapter 7, Section 90307.01 of the County's Land Use Ordinance (Title 9) establishes a process for reasonable accommodation requests for persons with disabilities. The County Building Department reviews development standards for compliance with the ADA regularly during the building permit review process.	Modified. Covered under new program 16.

Program		Implementation Status	Action
	Timetable: Ongoing		
Program 3.1.6 Continue to allow supportive housing types for persons with special housing needs, including persons with disabilities and developmental disabilities, in the County Land Use Ordinance Title 9, including the following: • Provision for group homes over six residents specifically for the disabled, other than those residential zones covered by state law; • Siting or separation requirements for licensed residential care facilities, to determine the extent to which the local restrictions affect the development and cost of housing; • Any minimum distance requirements in the Land Use Element for the siting of special-needs housing developments in relationship to each other do not impact the development and cost of housing for persons with disabilities; and • Alternate residential parking requirements, including reduction, for developments, including housing types for persons with special housing needs.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	Chapter 7, Section 90307.01 of the County's Land Use Ordinance (Title 9) establishes a process for reasonable accommodation requests for persons with disabilities. Residential care facilities for five or fewer individuals are permitted in the R-1, R-2, R-3 and A-2 zones; residential care facilities for six or fewer individuals are permitted in the R-3, R-4, and A-1 zones; residential care facilities for six or more are allowed in the R-1 and R-2 zones with a Conditional Use Permit. Community care facilities are permitted with a conditional-use permit in the R-3, R-4, A-1, and A-2 zones. The County will update Title 9 to reflect current state law. No supportive housing projects were proposed in the previous planning period.	Modified. Covered under new program 15.
Program 3.1.7 To address the extremely low-income housing need and ensure compliance with Assembly Bill (AB) 2634, the County Land Use Ordinance Title 9 will continue to explicitly allow single-room occupancy units (SROs) as permitted uses in the Medium- to High-Density Residential (R-3), High-Density Residential (R-4),	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time)	Single-room occupancy is permitted in the R-3, R-4, C-1, C-2, and A-1 zones to provide housing for extremely low-income residents. No applications were received for SROs in the previous planning period.	Modified. Covered under new program 17.

Program		Implementation Status	Action
General Commercial (C-2), and Limited Agricultural (A-1) zones.	**Timetable**: Ongoing		
Program 4.1.1 Encourage 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.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Update and redistribute assistance program information quarterly or as needed, education programs ongoing	At all Board of Supervisor meetings, the County discusses strategies to encourage housing outreach and education programs; however, there has been no interest in such a program.	Modified. Covered under new program 19.
Program 4.1.2 Ensure that fair housing enforcement is reviewed periodically to prevent discrimination. Reduce any effects of housing discrimination and prevent future discrimination by referring potential victims of discrimination to the appropriate fair housing agency.	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Annually	The County reviewed and amended Division 5 of Title 9 (the Zoning Ordinance) to ensure compliance with fair housing law, and continues to examine land use policies, permitting practices, and building codes to comply with state and federal fair housing laws. Imperial County complies with fair housing law regarding complaints by internally reviewing and responding to fair housing complaints and distributing fair housing information to the real estate industry and posting information in public buildings. To date, no fair housing complaints have been made to the County. Requests for reasonable accommodations are reviewed by the Director or another review authority and fair housing information is distributed to the real estate industry and posted in public buildings.	Modified. Covered under new program 19.

Program		Implementation Status	Action
Program 5.1.1 Continue to pursue funding for owner-occupied rehabilitation efforts. Rehabilitation efforts should include improving the existing stock of mobile home units.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: CDBG, HOME, other federal/state sources Timetable: Annually apply for funds to support existing owner-occupied rehabilitation program	In 2018, the County was awarded $500,000 in HOME Grant funding to be used to assist low-income families purchase their first homes and promote homeownership. However, in response to the COVID-19 pandemic, the County chose to redirect this funding to the TBRA program to better meet the needs of the community during this time. Also in 2018, the County was awarded $700,000 through CDBG for housing rehabilitation in Salton Sea Beach and Heber; each area was awarded $350,000 for these programs. The County is also working with the City of Calipatria to implement their HOME program. The County will continue to pursue funding for housing rehabilitation programs in the future. The County is still working on conditions to begin the program, expected to be completed in 2021, to begin providing TBRA rent assistance and housing rehabilitation.	Modified. Covered under new program 21.
Program 5.1.2 Continue to implement an active code enforcement and building inspection program to identify existing code deficiencies and encourage improvement of existing substandard dwelling units.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds (staff time) Timetable: Ongoing	The County received and responded to 1,043 notices of violations to the County code during the 2014-2021 planning period. Through responding to these violations, the County identified the most common areas of deficiency are the illegal parking of trailers on vacant lots and overgrown vegetation. The County uses this information to educate residents on their responsibilities and identify areas where additional enforcement is necessary.	Modified. Covered under new program 22.

Program		Implementation Status	Action
Program 5.1.3 The County will update its list of subsidized rental properties on an annual basis and identify units at-risk of converting to market rate. The County will contact the owner(s) of any identified at-risk units to determine their interest in selling the property or maintaining the affordability of the units. The County will work with property owners to apply for federal, state, and local subsidies to ensure the continued affordability of at-risk units and will maintain a list of non-profit organizations that may be interested in the acquisition/rehabilitation of at-risk units. The County will make information regarding tenants' rights and conversion procedures, as well as assistance organizations and information regarding other affordable housing opportunities within the County available to tenants of at-risk units.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Update annually, provide assistance as needed	The County relies on data from the California Housing Partnership Corporation to maintain an updated list of subsidized rental properties.	Modified. Covered under new program 23.
Program 6.1.1 Promote the use of energy conservation measures to "weatherize" existing homes as part of the County's rehabilitation program efforts.	Responsible Agency: Planning and Development Services Department Funding Source: CDBG, HOME, General Funds (staff time) Timetable: Ongoing	Through the 2018 CDBG funding application, under the Colonias allocation, the County was awarded funding for housing rehabilitation for Salton Sea Beach and Heber. Each area was awarded $350,000 for these programs.	Continue. Covered under new program 24.
Program 6.1.2 Continue to implement Title 24 Energy Conservation Requirements in housing design and rehabilitation efforts.	Responsible Agency: Planning and Development Services Department	Chapter 1 of Division 10 of the County's Land Use Ordinance (Title 9) establishes that the County will enforce all building regulations of Title 24, including Energy Conservation Requirements.	Delete.

Program		Implementation Status	Action
	Funding Source: General Funds (staff time) **Timetable**: Ongoing		
Program 7.1.1 Facilitate the flow of shared information and experiences regarding special topics between incorporated cities and unincorporated communities (e.g., innovative subdivision processes).	**Responsible Agency**: Planning and Development Services Department, Imperial Valley Housing Authority **Funding Source**: General Funds (staff time) **Timetable**: Coordinate communication annually or as appropriate, shared information is ongoing	The County works closely with both incorporated and unincorporated communities through community meetings and appointing members to Community Districts such as the Seeley Water Board and Heber Water District. Additionally, the County works closely with the Heber Utility District and related projects. The County Building Department manages recreational vehicle (RV) and mobile home parks throughout the county, in both unincorporated areas and on behalf of cities in incorporated areas. The County works directly with cities on issues related to management of this housing, such as responding to comments on projects, complaints, and more.	Modified. Covered under new program 25.
Program 7.1.2 Continue to support the coordination between public agencies through the County's intra- department/agency framework that allows specialist staff to have daily interaction and access to a global computer permitting and monitoring program linked to other development-related departments/agencies.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County supports coordination with public agencies and other inter-departmental coordination through the development process. Most projects include a pre-application meeting, to which the County invites all local and state agencies that are related to the project or may have an interest. Beyond this, and for projects that do not have a pre-application meeting, the County solicits comments from local agencies and other departments during the permitting process and public hearings.	Delete.

Program		Implementation Status	Action
Program 7.1.3 Continue to coordinate with the Imperial Valley Housing Authority to promote housing efforts.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds Timetable: Review coordination efforts annually, coordination ongoing	The County works with the Imperial Valley Housing Authority and has an ongoing partnership to promote development of a variety of housing types, with an emphasis on creating and maintaining affordable housing units. As part of this maintenance, the County coordinates services for a mobile home in a park owned by the housing authority. Due to limited funding, the County has been unable to assist in the construction of additional affordable housing in recent years.	Modified. Covered under new program 4.
Program 7.1.4 Coordinate with regional employers to determine appropriate housing types for employees that live in Imperial County.	Responsible Agency: Planning and Development Services Department, Imperial Valley Housing Authority Funding Source: General Funds (staff time) Timetable: Ongoing	The County coordinates with employers in the region, with a special focus on large projects, to encourage local employment of residents that are already housed in the area. The County provides incentives when employers meet a threshold set on a project-by-project basis for how many employees are local residents rather than attracting new workers in need of temporary housing.	Modified. Covered under new program 25.
Program 7.1.5 Continue to support economic development activities coordinated through the Planning and Development Services Department by providing technical support in the form of service area plan updates. These updates contain a record of undeveloped lands through the creation of residential subdivisions, annexation of land to incorporated cities, and the capacities of water and sewer in the unincorporated areas.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	During the previous planning period, the County supported creation of additional housing through annexations of land for the Lotus Ranch and Miller-Burson developments into El Centro and the Russel Court development into Imperial County. In 2018, the Seeley County Water District released an update to their Service Area Plan finding that, in the Seeley service area, wastewater facilities are operating at 45-percent capacity and water facilities are operating at 20-percent capacity. 1.	Delete.

Program		Implementation Status	Action
		The following have been completed to date: • Winterhaven Public Safety Facility • Subsistence Payments Program • Neighborhood Cleanups • Telemedicine Equipment for Clinicas de Salud del Pueblo • Library Needs Assessment (TA) • Poe Colonia Wastewater Plant Improvements • Palo Verde Water Well #1 Improvements • Seeley Water Line Distribution System Improvements The following projects are in progress: • Winterhaven Water Treatment Plant Improvements • Niland Public Safety Facility The 18 CDBG grants were just received a few months ago. The County needs to clear general conditions and get approval from the state before they begin. The County is currently working on general conditions. These projects include: • Seeley Fire Station • Palo Verde Water Well #2 Improvements • Heber Housing Rehabilitation • Salton Sea Beach Housing Rehabilitation No projects have been completed under	

Program		Implementation Status	Action
		housing rehabilitation as of yet since the County is still working on conditions to begin the programs.	
Program 8.1.1 Continue to improve the planning permit processing procedures by improving information retrieval capabilities of counter and project staff, continuing pre-application meetings, and providing updated written materials, such as checklists and application forms with fee and standards guidelines to developers. Continue to apply mandatory time frames for application review. The County's updated website features a function that will allow developers to track their projects through the permit processing procedures.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing as projects are submitted to the Planning Department	The County has implemented streamlining for solar (i.e. rooftop solar for on-site consumption) in the Zoning Ordinance, is undergoing a review of permit procedures for industrial development, and intends to complete a review of residential permitting procedures next. During each of these reviews, the County has analyzed input from the public and developers on permit processing procedures as well as reviewed the Zoning Ordinance for constraints on development that may result in delays.	Modified. Covered under new program 27.
Program 8.1.2 The County will consider updating community and urban area plans as staff develops a timeline for completing them.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: 2014-2021	Due to a lack of funding, the County was unable to update community and urban area plans in the previous planning period. However, County contracted a consultant at the end of 2020 to assist with local and regional planning (LEAP/REAP) grant applications and plans to use the funding, if received, to assist with community plan updates.	Modified. Covered under new program 27.
Program 8.1.3 Increase the use of the clustered Planned Residential Development (PRD) approach by lowering the minimum land area required for a PRD project. The PRD usually allows higher densities than conventional subdivisions and, through clustering, can reduce infrastructure costs. This will be achieved through the Specific Plan process so developers can select sites to apply the PRD.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Case-by-case basis; ongoing	The County did not use clustered PRD during the previous planning period, and instead encourages higher density for housing through Specific Plans. Three Specific Plans were processed during the previous planning period: McCabe Ranch, Rancho Los Lagos, and 101 Ranch.	Modified. Covered under new program 12.

Program		Implementation Status	Action
Program 8.1.4 Continue to permit landowners to build on lots of record that are currently below the minimum lot size, but only where such construction does not create land use conflicts, such as with existing agricultural operations.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	Chapter 4, Section 90804.01, of Division 8 of the County's Land Use Ordinance (Title 9) specifies that lots smaller than the applicable parcel size can still be developed under specific requirements: the parcel boundaries were determined prior to the establishment of the current minimum parcel size or a subdivider agrees to surrender development rights of a portion of a minor subdivision such that the reduced lot sizes will not result in increased density than otherwise permitted. The Planning Director or Planning Commission may also approve a parcel map of no more than four parcels where one or all parcels are smaller than the applicable minimum parcel size if there are existing small parcels in the same area that meet requirements outlined in Section 90804.01.	Modified. Covered under new program 28.
Program 8.1.5 Continue to use the International Conference of Building Officials (ICBO) to ensure a set of consistent codes. In addition, model codes shall be periodically evaluated for new information on technological advances.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time) Timetable: Ongoing	The County enforces Title 24, the California Building Standards Code, updated regularly as the State updates the code to ensure new information and technological advances are included and enforced.	Delete.
Program 8.1.6 Review building codes periodically to incorporate the most economical construction alternatives consistent with health and safety.	Responsible Agency: Planning and Development Services Department Funding Source: General Funds (staff time)	The County enforces Title 24, the California Building Standards Code. The California Building Standards Codes are updated every three years to ensure consistency with health and safety codes and promote the most economical construction alternative. By enforcing these updated codes, the County ensures their	Modified. Covered under new program 5.

Program		Implementation Status	Action
	Timetable: Review annually	building code addresses construction alternatives, health, and safety.	
Program 8.1.7 Encourage projects for special-needs groups and for lower- and moderate-income households by using the appropriate County ordinance to permit reduced lot sizes, reduced site setbacks, and off-street parking, thereby reducing land costs for private-sector housing developments. This will be implemented through ensuring all staff are fully knowledgeable of potential development standard reductions through the monthly staff meeting process.	**Responsible Agency**: Planning and Development Services Department **Funding Source**: General Funds (staff time) **Timetable**: Ongoing	The County works closely with various community organizations, the Board of Supervisors, the Catholic Church, and other interested churches to pursue opportunities for development of new transitional and supportive housing, as well as other housing types for special-needs groups. Many community organizations work directly with Board members to identify sites and incentives necessary to promote development of housing for special needs groups, such as flexibility in development standards. The County and these groups have identified suitable sites, but none have been developed. The County will continue the intent of this program through incentives to encourage special needs housing.	Modified. Covered under new program 9.

III. Goals, Policies, and Programs

This section of the Housing Element presents Imperial County's goals, policies, and programs relative to the development, improvement, and maintenance of housing within the unincorporated areas of the county, for the planning period of 2021 to 2029.

In general, housing goals are a long-term end in which action is directed. Imperial County's goals are ideals that have been determined by the citizens as desirable and deserving of community time and resources. Policy statements are more specific and shorter range. Programs are action statements and provide well-defined guidelines for decision-making and identify the entity responsible for implementation, funding sources, the time frame for completion, and quantified objectives.

Goal 1: Ensure the availability of a variety of housing types for all income levels throughout the county.

Policies

1.1 Provide for an adequate supply of housing in suitable locations and with adequate services that collectively accommodate a range of housing types, sizes, and prices meeting the needs of all economic segments of the county's population.

1.2 The County shall allow housing developments with at least 20-percent affordable housing by-right on lower-income housing sites that have been counted in previous Housing Element cycles, consistent with Assembly Bill 1397. *(New policy)*

Programs

1. Meeting the Regional Housing Needs Allocation *(Previously Program 1.1.1).*
   The County will ensure adequate sites are available at all times throughout the planning period to meet the County Regional Housing Need for each income category capacity consistent with no net loss and identify additional sites as needed consistent with California Government Code Section 65863.

   Responsible Agency: *Planning and Development Services Department*

   Funding Source: *General Funds (staff time)*

   Timeframe: *Ongoing, throughout the planning period*

2. Infrastructure Availability and Coordination *(New Program)*
   The County shall work with community service districts to identify and overcome constraints to providing water and sewer service for housing, prioritizing improvements for lower-income housing and in low-resource areas to further place-based revitalization efforts. The County will:

- Coordinate every two years with service providers to assess the needs for infrastructure and services and discuss and assist in implementation of plans for expansion based on future proposed developments.
- Apply for funding from the Community Development Block Grant, Infill Infrastructure Grant Program, or other funding programs, as available, to fund design plans and infrastructure improvements for affordable housing projects.
- Annually ~~explore and~~ pursue funding opportunities for specific plan updates as necessary to promote development within existing communities with active transportation and access to services and amenities.
- Provide a copy of the adopted Housing Element to the various service providers serving the unincorporated communities and provide assistance to providers to facilitate establishing procedures to grant priority service to the development of housing with units affordable to lower-income households.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Coordinate with service providers every two years and i~~I~~dentify infrastructure constraints by May 15, ~~2024~~2023; Fund and conduct infrastructure improvements dependent on grant funding availability. Explore and pursue Notices of Funding Availability (NOFAs) annually. Re-evaluate progress and effectiveness of implementation in 2025 and make appropriate adjustments within 6 months.*

Quantified Objective: *Expansion of water and sewer services in underserved areas to promote place-based revitalization and accommodate the development of at least 1,000 lower-income units within the planning period. Target areas of concentrated need as identified through the Colonia Master Plan update (Program 4).*

3. Specific Plan Development *(Previously Program 1.1.6)*

Continue to encourage planned developments through the Specific Plan development agreement process to achieve innovative housing designs; facilitate the integration of affordable housing and mixed-income settings in new growth Specific Plan areas.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *~~———~~General Funds (staff time)*

Timeframe: *Ongoing as Specific Plan applications are processed.*

Quantified Objective: *287 lower-income units in a mixed-income and mixed-use specific plan development to promote access to opportunity for lower-income households and facilitate housing mobility in higher resource areas*

~~3.~~4. Colonia Master Plan *(New)*

Conduct an infrastructure needs assessment in colonias to update the Colonia Master Plan and identify specific issues in unincorporated communities. Conduct an in-person survey of residents to determine needs, barriers to investment and healthy living conditions, and record existing conditions in each colonias. Based on the findings of the assessment and survey, develop and implement a targeted program to prioritize public investment in basic infrastructure in areas of concentrated need to create safe and healthy living environments. Strategies to implement place-based revitalization may include, but are not limited to:~~*Continue to encourage planned developments through the Specific Plan development agreement process to achieve innovative housing designs; facilitate the integration of affordable housing and mixed-income settings in new growth Specific Plan areas.*~~

- Expand or improve water, sewer, and other facilities;
- Construct sidewalks, curbs, and gutters;
- Conduct an assessment of existing structures for inadequate plumping, assist owners in identifying funding to address deficiencies and explore and pursue funding opportunities and partnerships to address needs;
- Acquire vacant and abandoned housing units and work with non-profits to rehabilitate these units per Program 5; and
- Explore and pursue other housing and community development needs and amenities.

Responsible Agency: *Workforce and Economic Development, Planning and Development Services Department*

Funding Source: *REAP*

Timeframe: *Survey the residents and conditions of a minimum of two colonias annually, beginning in 2022; within ~~2 years~~1 year of assessment of each colonia develop and implement a targeted program to invest in public infrastructure to promote public health, welfare, and safety.*

Quantified Objective: *Connect ~~100~~250 colonia residents (*target 150 homes for infrastructure improvements*) with resources and funding to improve the conditions of their home to facilitate place-based revitalization and encourage housing mobility through a stabilized housing stock.~~Responsible Agency: Planning and Development Services Department~~*

~~*Funding Source: General Funds (staff time)*~~

~~*Timeframe: Ongoing as Specific Plan applications are processed.*~~

Goal 2: Encourage affordable housing developments by using all available funding sources, offering developer incentives, and allowing a wide range of housing types to serve the housing needs of the county's labor force, special-needs groups, and families of all income levels.

Policies

2.1 Continue to use existing financing services and to stimulate the development of innovative financial techniques that will reduce housing.

2.2 Facilitate the creation of affordable housing units and offer incentives for developers to create housing for all income levels, to reflect Imperial County's share of the region's housing needs.

Programs

5. Acquisition, Rehabilitation, and Construction of Affordable Housing *(Previously Program 2.1.1)* Work with public or private sponsors, as well as the Imperial Valley Housing Authority, to support the acquisition/rehabilitation of existing multifamily units to be converted to affordable housing. Provide technical assistance in funding acquisition, rehabilitation, and/or the construction of affordable housing units by assisting with developing innovative and cost-effective construction methods including the use of solar energy, xeriscaping, and green building materials. The intent of this is to reduce displacement risk for lower-income households by increasing the supply of affordable housing.

Responsible Agency: *Planning and Development Services Department; Imperial Valley Housing Authority*

Funding Source: *HOME and other United States Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD) grants as they become available, Community Development Block Grant (CDBG), General Fund (staff time)*

Timeframe: *Annually meet with interested developers to identify and pursue opportunities.*

Quantified Objective: *Facilitate place-based revitalization through acquisition and conservation of ~~50~~100 units for affordable housing, provide rehabilitation assistance for ~~30~~ ~~50~~100 low-income units. ~~,~~ ~~e~~Encourage ~~10~~ 30 of these units to be in areas of concentrated rehabilitation need and ~~10~~ 30 in areas of concentrated poverty.*

6. Review County Processes, Procedures, and Development Costs *(Previously Program 2.2.1)* Biannually review the County's building code, zoning ordinance, subdivision ordinance, and processing procedures to identify and modify process requirements, approval of criteria, and/or fees that could create an impediment to the cost of housing. Encourage innovative and cost-effective construction methods to reduce housing costs by providing incentives such as density bonus units, reduction in development standards, and fee waivers/deferrals, and assisting in accessing state and federal subsidies. The County will also continue to contract with outside firms to perform plan check reviews for more complex projects to provide timely development approvals.

   Responsible Agency: *Planning and Development Services Department*

   Funding Source: *General Funds (staff time)*

   Timeframe: Biannually review and update, as necessary.

7. Update Density Bonus *(Previously Program 2.2.2)*
   The County will amend Division 3 of Title 9 to comply with changes in California's density bonus law (California Government Code Section 65915, as revised) and will promote the use of density bonuses for lower-income units by providing information through a brochure in County buildings and on the County's website.

   Responsible Agency: *Planning and Development Services Department*

   Funding Source: *General Funds (staff time)*

   Timeframe: *Amend Division 3 within one year of Housing Element adoption.*

   Quantified Objective: *30 lower-income units*

8. Development Standards *(New Program)*
   The County will amend the Land Use Ordinance Title 9 to address the following development standards:

   a. Accessory Dwelling Units. Allow ADUs by-right in all zones in which single family or multi-family residential uses are permitted, regardless of if the residence is the primary use, in compliance with Government Code Section 65852.2.

   b. Emergency Shelter Parking. Allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency

shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii)).

c. Manufactured Housing. Permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings in compliance with Government Code Section 65852.3(a)

d. Employee Housing. Treat employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses and treat employee/farmworker housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with Health and Safety Code Sections 17021.5 and 17021.6.

~~d.~~e. Multifamily Parking Requirements. The County will review parking requirements for smaller multi-family units, including studios and one-bedrooms, to determine if current requirements constrain development of units of this size. Based on findings, the County will revise Division 4 as necessary.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Amend the Land Use Ordinance within one year of Housing Element adoption. Review parking standards and revise within one year of adoption of the Housing Element.*

9. ADU Incentives *(New Program)*

The County shall promote accessory dwelling units as an affordable housing option and an economic mobility opportunity in Imperial County through the following actions.

- Promote ADUs on existing residential lots by providing information to homeowners about the benefits of accessory dwelling units (ADUs) and/or junior accessory dwelling units (JADUs).
- Provide bilingual (English and Spanish) guidance and educational materials for building ADUs/JADUs on the County's website and in a brochure available at County buildings, including permitting procedures and construction resources. Additionally, the County shall present homeowner associations with the community and neighborhood benefits of accessory dwelling units, inform them that covenants, conditions, and restrictions (CC&Rs) prohibiting ADUs are contrary to state law, and ask homeowner associations to encourage such uses.
- Explore options for establishing a loan program to help homeowners finance the construction of ADUs. The County shall consider incentives to encourage homeowners to deed restrict ADUs for lower-income households.

- Develop a streamlined permit review procedures and standards for ADUs, including offering assistance with the permitting process both online through the County's website and in-person.
- Develop and implement a monitoring program that will track ADU approvals and affordability. The County will use this monitoring program to track progress in ADU development and adjust or expand the focus of its education and outreach efforts through the 2021-2029 planning period. The County will evaluate ADU production and affordability two years into the planning period (2023), and if it is determined these units are not meeting the lower-income housing need, the County shall ensure other housing sites are available to accommodate the unmet portion of the lower-income RHNA. If additional sites must be rezoned, they will be consistent with Government Code Sections 65583(f) and 65583.2(h).
- Prepare a selection of pre-approved ADU plans to assist with streamlining and reduce permitting costs.
- Emphasize marketing of ADU guidance and materials in areas of high opportunity to encourage the development of new affordable housing in areas of opportunity as a strategy to enhance mobility and reduce displacement of low-income households seeking affordable housing options.
- ~~Explore options for establishing a loan program to help homeowners finance the construction of ADUs. The County shall consider incentives to encourage homeowners to deed restrict ADUs for lower-income households.~~

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Fund (staff time)*

Timeframe: *Develop ADU informational materials, develop a streamlined permit review procedures and standards, develop, and implement a monitoring program that will track ADU approvals and affordability and prepare a selection of pre-approved plans within two years of Housing Element adoption.*

Quantified Objective: *~~8~~ 20 lower-income ADUs: ~~3~~ 10 in areas of concentrated poverty and ~~5~~ 10 in high resource areas to provide housing mobility opportunities and reduce displacement risk for lower-income households.*

10. Housing for Special-Needs Groups *(Previously Program 2.2.3)*

Increase the supply of affordable housing for special-needs groups, including seniors, persons with disabilities, and extremely low-income individuals and families, by providing regulatory incentives such as permitting reduced lot sizes, reduced site setbacks, and off-street parking to lessen land costs for housing development. The County will take subsequent action, as appropriate, to make the development of such units more financially feasible, including supporting the use of federal and state funding resources for local housing needs and programs

and providing financial incentives, such as reducing, waiving, and/or deferring fees, where feasible, offering fast-track/priority processing, and density bonuses.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds, Serna, CDBG*

Timeframe: ~~———~~*Ongoing as applications are received, identify whether there is a need for subsequent action by July 2024.*

Quantified Objective: ~~*50*~~ *75 lower-income units to reduce displacement risk;~~,~~ 30 of which in high resource areas to facilitate access to opportunity and housing mobility opportunities*

11. Farmworker Assistance *(Previously Program 2.2.7)*

To provide housing and meet the needs of farmworkers, the County will implement the following:

- Continue to seek funding from the Joe Serna Jr. Farmworker Housing Grant Program (Serna) for the rehabilitation of existing farmworker units and the construction of new units.
- ~~Collaborate~~ Meet ~~biannually~~biennially with agricultural employers and developers of affordable housing to identify sites and funding sources available through the California Department of Housing and Community Development (HCD) and the United States Department of Agriculture (USDA) Rural Development programs for farmworker housing and partner on development opportunities including incentives and support of funding applications.
- Complete a farm working survey to better understand the living conditions and daily service needs of the farm worker population to inform place-based revitalization efforts. Based on results, develop and implement a targeted program within 3 years to work with farmworker employers, service providers, and developers to identify funding and pursue development opportunities to improve housing conditions and promote the availability of rehabilitation assistance in farmworker communities.
- Encourage place-based revitalization and reduce displacement risk by organizing bilingual outreach materials and activities to educate and inform the farm worker community about available rehabilitation programs and resources. Provide materials annually to community groups and districts to distribute to members.
- When funding allows, provide relocation assistance for farmworkers displaced due to rehabilitation efforts.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds, Serna, CDBG*

Timeframe: *Make bilingual resources available by June 2022; complete the survey by June 2023; apply for funding annually, as NOFAs are released.*

Quantified Objective: ~~*Rehabilitate*~~ *Reduce displacement risk through the rehabilitation of* ~~*10*~~ *50 farmworker units and facilitate long-term place-based revitalization through the results of the farm working survey.*~~.~~

12. Assistance for Service Providers *(Previously Program 2.2.10)*

The County will assist and support local social service agencies in their applications for state and federal funds to provide housing-related services to lower-income households and special-needs groups, particularly those offering supportive housing programs for homeless individuals and families.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: ~~———~~*Ongoing or as requested. Annually promote the availability of assistance to local service providers to increase awareness.*

Quantified Objective: *Support the construction of 20 units in supportive housing facilitates and connect 32 eligible households with local social services.*

Goal 3: Continue to facilitate the provision of housing suited to persons with special housing needs.

Policy

3.1 Provide the appropriate regulatory framework, funding availability, and other necessary services for the creation of housing for persons with special needs, which include large families, farmworkers, the elderly, persons with disabilities and developmental disabilities, single-parent families, extremely low-income households, and the homeless.

Programs

13. Support Affordable Housing Development *(Previously Program 1.1.2)*

The County shall work with housing developers to expand opportunities for affordable lower-income and workforce housing by creating partnerships, providing incentives, and pursuing funding opportunities, with a particular emphasis on developing affordable housing in high resource areas to promote mobility between low and high resource areas. Specifically, the County shall:

- Provide technical assistance with site identification, site acquisition, and permit processing procedures.

- Promote the use of the density bonus ordinance, application processing fee waivers, impact fee waivers, and fee deferrals to encourage affordable housing, with an emphasis on encouraging affordable housing in high resource areas.
- Facilitate the approval process for land divisions, lot line adjustments, and/or specific plans or master plans resulting in parcel sizes that enable affordable housing development and process fee deferrals related to the subdivision for projects affordable to lower-income households.
- Partner with nonprofit and for-profit affordable housing developers and self-help housing providers to provide technical assistance and support their financing applications for state and federal grant programs, tax-exempt bonds (e.g., Mortgage Revenue Bonds), and other programs that become available.
- Pursue federal, state, and private funding for low- and moderate-income housing by applying for state and federal monies for direct support of lower-income housing construction and rehabilitation, specifically for development of housing affordable to extremely low-income households.
- Increase the use of the clustered Planned Residential Development (PRD) approach by lowering the minimum land area required for a PRD project to reduce infrastructure costs through clustering.
- Encourage construction of larger housing units with three or more bedrooms by considering the allowance of parking reduction, fee waivers, and other incentives.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time), California Housing Finance Agency (CHFA), HOME funds, CDBG funds, Technical Assistance grants*

Timeframe: *Meet with developers annually, apply for funding annually as available.*

Quantified Objective: *150 low-income; 150 very low-income; 50 extremely low-income units. Half of these will be in high resource areas to promote access to services and opportunity, the remainder will be in low-resource areas with a shortage of affordable housing.*

14. Community Assistance Programs *(Previously Program 3.1.1)*

Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services offices and on the County's website. Invite organizers of community assistance programs to present their services at least annually at public meetings and workshops.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Review information and update quarterly, distribution ongoing*

Quantified Objective: *Connect 20 eligible persons or households with local community assistance programs and/or homeless services to facilitate housing mobility for persons in these populations.*

15. Regional Coordination on Homelessness *(Previously Program 3.1.2)*

Collaborate with the Imperial Valley Continuum of Care and other nonprofit organizations that provide emergency shelter and other support services to promote community-wide planning and strategic use of resources to address homelessness. Assist emergency shelters/transitional housing providers in acquiring state, federal, and local funding for services for the homeless.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, and coordination at least annually throughout the planning period*

Quantified Objective: *Facilitate improved access to opportunity and resources and connect 10 persons experiencing or at-risk of homelessness with services.*

16. Land Use Ordinance Title 9 Amendments *(Previously Program 3.1.3, new)*

The County will remove barriers to housing for special-needs groups by amending the Land Use Ordinance Title 9 to address the following:

a. Transitional and Supportive Housing. Allow transitional and supportive housing as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone and to allow supportive housing as a permitted use without discretionary review in zones where multifamily and mixed-use developments are permitted, including nonresidential zones permitting multifamily uses, in compliance with California Government Code Section 65583(c)(3).

b. Definition of Family. Update the definition of family to be "one or more persons living together in a dwelling unit."

c. Residential Care Facilities. Allow residential care facilities for six or fewer persons in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for seven or more persons ~~with a valid license~~ in the same manner in accordance with the State's definition of family.

d. Low-Barrier Navigation Centers. Allow low-barrier navigation centers for the homeless by-right in zones that allow for mixed-use and nonresidential zones permitting multifamily uses, per California Government Code Section 65662.

e. Domestic Violence Shelters. Remove use permit requirements for facilities for abused men/women/children in compliance with the definition of supportive housing, in compliance with Health and Safety Code Section 50675.14.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Amend the Land Use Ordinance within one year of Housing Element adoption.*

17. Persons with Disabilities *(Previously Program 3.1.5)*

Ensure that persons with disabilities (including persons with developmental disabilities) have increased access/placement in residential units rehabilitated or constructed through County programs by completing the following:

- Continue to ensure new developments are compliant with standards outlined in the Americans with Disabilities Act (ADA) for persons with disabilities.
- Encourage "universal design" features, such as level entries, larger bathrooms, and lower kitchen countertops to accommodate persons with disabilities.
- Encourage multifamily housing developers to designate accessible and/or adaptable units to be affordable to persons with disabilities or persons with special needs.
- Cooperate with nonprofit agencies that provide placement or referral services for persons with disabilities.
- Coordinate with the San Diego Regional Center, particularly the Imperial Valley office, and local hospitals to promote outreach efforts that inform families in the county on housing and services available for persons with developmental disabilities.
- Review and revise the County's findings for approving reasonable accommodation requests, including, but not limited to, potential impact on surrounding uses, physical attributes of the property and structures, and any other findings that may be potential barriers to housing for persons with disabilities.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as projects are processed ~~.~~ and review and revise the County's findings for approving reasonable accommodation requests by December 2022.*

18. Development of Housing for Extremely Low-Income Households *(Previously Program 3.1.7)*

To address the extremely low-income housing need and to ensure compliance with Assembly Bill (AB) 2634, the County Land Use Ordinance Title 9 will continue to explicitly allow single-room occupancy units (SROs) as permitted uses in the Medium-High Density Residential (R-3), High-Density Residential (R-4), General Commercial (C-2), and Limited Agricultural (A-1) zones. Additionally, the County will encourage the development of housing for extremely low-income households through a variety of activities, such as outreach to housing developers every 12 to 18 months, providing financial assistance (when feasible) or in-kind technical assistance or land write-downs, providing expedited processing, identifying grant and funding opportunities, applying for or supporting applications for funding on an ongoing basis, reviewing and prioritizing local funding at least twice in the planning period, and/or offering additional incentives beyond the density bonus.

Responsible Agency:	*Planning and Development Services Department, Imperial County Workforce and Economic Development Department*
Funding Source:	*General Fund (staff time), HOME and other HUD and HCD grants as they become available.*
Timeframe:	*Ongoing, as projects are processed, and annual outreach with local developers.*
Quantified Objective:	*~~20~~ 40 extremely low-income units in areas of concentrated poverty to reduce displacement risk*

Goal 4: Facilitate the provision of fair housing opportunities for all residents of Imperial County.

Policy

4.1 Provide the appropriate regulatory framework, funding availability, and other necessary services for the creation of housing for persons with special needs, which include large families, farmworkers, the elderly, persons with disabilities and developmental disabilities, single-parent families, extremely low-income households, and the homeless.

Programs

19. Fair Housing Outreach *(Previously Program 4.1.1)*

To reduce any potential for housing discrimination and to improve residents' access to opportunities and programs, the County will:

- 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.

- Coordinate with local fair housing providers to conduct a public workshop on tenant and landlord rights and responsibilities.
- Work with fair housing providers biannually to review discrimination cases and complaints to identify any trends in the county.
- As staff capacity and budget allows, conduct a survey of and respond to resident needs and preferences, including best ways to conduct future outreach.

Continue to refer discrimination inquiries to the appropriate fair housing agency, including the Inland Fair Housing and Mediation Board and California Rural Legal Assistance on an ongoing basis.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Update and redistribute assistance program information quarterly or as needed, meet biannually with fair housing provider to plan a workshop; refer discrimination cases as received. Complete a housing conditions survey within 3 years, if funding is available.*

Quantified Objective: *Provide education on fair housing laws, rights, and responsibilities to 30 landlords and 50 tenants.*

20. Improve Low-Resource Areas Access to Opportunities *(New Program)*

The County shall improve low-resource areas to increase access to opportunity for lower-income households by conducting the following:

- Meet biannually with Imperial County Transportation Commission, and other transit providers as applicable, to identify unmet transit needs and increase mobility and provide increased transit from unincorporated communities to schools.
- If an unmet transit need is identified while meeting with the Commission, annually apply for funding opportunities for improved transit service, particularly around areas with lower-income sites and communities on the western shore of the Salton Sea.
- Allow for employment centers to be located near housing developments to increase job opportunities.
- Annually distribute materials with utility bills to promote the CalWorks program offered by the County in rural areas of the unincorporated County to improve access to employment training, assistance, and job opportunities; emphasize marketing of this program in areas with higher rates of single-parent households.
- Increase community services in low-resource areas, such as public libraries and parks.

- Review existing zoning within one year of Housing Element adoption to ensure medical services are allowed throughout the County, specifically in low-resource areas.
- Review existing zoning within one year of Housing Element adoption to ensure grocery stores are allowed in low-resource areas.
- Meet annually with the Imperial Valley Environmental Justice Taskforce to identify steps the County can take to improve environmental conditions for all residents.
- Develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities within the county, provide information on this program to realtors and housing providers.
- To achieve public participation target lower-income and special needs households and neighborhoods with higher concentrations of lower-income households are included in public participation efforts, target stakeholders or other organizations that represent lower-income and special needs households or establish a committee representative of lower-income households in future public outreach efforts.
- Apply for funding through the Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP), as NOFAs are released, to convert mobilehome parks to ownership units or put in the control of a resident organization, nonprofit housing sponsor, or local public entity. Use this funding on mobilehome parks in concentrated areas of poverty as well as in areas of opportunity to provide affordable ownership opportunities for housing mobility.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as identified in each bullet.*

Quantified Objective: *Provide opportunities to low resource areas to assist at least 20 extremely low-income households, 20 very low-income households, 20 low- income households.*

Goal 5: Encourage the improvement, rehabilitation, and revitalization/reinvestment of the county's existing residential neighborhoods.

Policy

5.1 Ensure that the quality, safety, and livability of the housing stock in the county are continually maintained or upgraded and that dilapidated housing that cannot be improved is replaced, where appropriate and necessary.

Programs

~~20.~~21. Housing Rehabilitation *(Previously Program 5.1.1)*

The County will seek appropriate funding through the CalHome Program and the CDBG Program to provide housing rehabilitation loans and weatherization services for extremely low-, very low- and low-income households and for single family, multifamily, and mobile home units. Funds will be available to both owner-occupied units and owners of tenant-occupied units and marketed through multilingual outreach materials to educate and inform all residents on the available rehabilitation programs and resources. When funding allows, the County will also provide relocation assistance for occupants displaced due to rehabilitation work. Additionally, as feasible, the County will conduct a housing conditions survey, including assessing replacement and rehabilitation need in mobile home parks.

Responsible Agency: *Planning and Development Services, Imperial Valley Housing Authority*

Funding Source: *CDBG, HOME, other federal/state sources*

Timeframe: *Annually apply for funds to support existing owner-occupied rehabilitation program. Complete a housing conditions survey within 3 years, if funding is available.*

Quantified Objective: *Reduce displacement risk for 100 lower-income units, 80 of which in areas of concentrated poverty to encourage place-based revitalization*

~~21.~~22. Code Enforcement *(Previously Program 5.1.2)*

Continue to implement a proactive code enforcement and building inspection program through the Planning and Development Services Department to identify existing code deficiencies and encourage improvement of existing substandard dwelling units and mobile homes to eliminate substandard conditions and address areas of concentrated rehabilitation need, which could result in repairs and mitigate potential costs, displacement, and relocation impacts on residents. Emphasize enforcing healthy and safety compliance for farmworker and transitional housing. The County will provide brochures in both English and Spanish on the County's website regarding the code enforcement process and available resources to assist with rehabilitation.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Make brochures available by July 2022, implement code enforcement process on a proactive basis.*

Quantified Objective: *Reduce displacement risk by facilitating rehabilitation of 50 units by connecting owners with available assistance programs.*

~~21.~~23. At-Risk Properties *(Previously Program 5.1.3)*

The County will update its list of subsidized rental properties on an annual basis and identify units at risk of converting to market rate. For complexes or units are risk of converting to market rate, the County shall:

- Contact the owner(s) of any identified at-risk units within one year of affordability expiration to discuss the desire to preserve complexes as affordable.
- Reach out to owner(s) to determine their intent to maintain the affordability of the units' interest in selling the property. In addition, the County will coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with property owners to apply for federal, state, and local subsidies to ensure the continued affordability of at-risk units and maintain a list of non-profit organizations that may be interested in the acquisition/rehabilitation of at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Annually monitor and apply for funding as Notices of Funding Availability are released.*

Quantified Objective: *24 lower-income units*

Goal 6: Promote sustainable development by encouraging the inclusion of energy conservation features in new and existing housing stock.

Policy

6.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation.

Programs

~~23.~~24. Energy Efficiency and Conservation *(Previously Program 6.1.1)*

Promote the use of energy efficiency and conservation through measures to weatherize existing homes through informational brochures available at County buildings and continuing to implement Title 24 Energy Conservation Requirements in housing design and rehabilitation efforts.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *CDBG, HOME, General Funds (staff time)*

Timeframe: *Make information available on the County's website and in brochures in public buildings by December 2022 and implement as applications for new construction and rehabilitation are received.*

Goal 7: Encourage and facilitate the regional coordination of public agencies and business organizations to maximize public and private-sector resources that will support a vibrant community.

Policy

7.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation.

Programs

~~24.~~25. Regional Coordination *(Previously Programs7.1.1 and 7.1.4)*

Facilitate regional coordination with employers, housing and service providers, and incorporated cities and unincorporated communities to encourage shared information and experiences and to develop regional plans to address housing needs.

Responsible Agency: *Planning and Development Services Department, Imperial Valley Housing Authority*

Funding Source: *General Funds (staff time)*

Timeframe: *Invite regional stakeholders to a biannual meeting and facilitate distribution of shared information as available.*

Goal 8: Pursue actions to reduce regulatory constraints to housing that impede housing opportunities.

Policy

8.1 Promote architectural design and orientation of residential developments in a way that promotes energy conservation and noise abatement, including implementing Goals 1, 2, and 3 of the County's General Plan Noise Element.~~.~~

Programs

~~25.~~26. Development Streamlining *(Previously Program 8.1.1)*

Review and update policies and requirements of Division 3 of the County's Land Use Ordinance Title 9 and community design elements of various community and urban area plans to ensure development standards are objective. The County shall only deny a development project based

on development standards if such standards are objective, quantifiable, written development standards, conditions, and policies.

Additionally, the County will establish a written policy or procedure and other guidance as appropriate to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects, as set forth under California Government Code Section 65913.4. The County will also continue to improve planning permit processing procedures by improving information retrieval capabilities of counter and project staff, continuing pre-application meetings, applying mandatory time frames for application review, and providing updated written materials such as checklists and application forms with fee and standards guidelines to developers. The County's updated website features a function that will allow developers to track their projects through the permit processing procedures.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Establish a SB 35 process by December 2022, implement as projects are submitted to the Planning Department*

Quantified Objective: *20 low-income units*

~~26.~~27. Small Lot Development *(Previously Program 8.1.4)*

Continue to permit landowners to build on lots of record that are currently below the minimum lot size, but only where such construction does not create land use conflicts, such as with existing agricultural operations. Additionally, to assist with development of affordable housing, the County will help facilitate lot consolidations to combine small residential lots into larger developable lots by providing information on development opportunities and incentives for lot mergers to accommodate affordable housing units on the County's website and discussing with interested developers. As developers/owners approach the County interested in lot consolidation for the development of affordable housing, the County will offer the following incentives on a project-by-project basis:

- Allow affordable projects to exceed the maximum height limits,
- Lessen setbacks, and/or
- Reduce parking requirements.

The County will also consider offsetting fees (when financially feasible) and concurrent/fast tracking of project application reviews to developers who provide affordable housing.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Funds (staff time)*

Timeframe: *Ongoing, as projects are processed through the Planning and Development Services Department. Annually meet with local developers to discuss development opportunities and incentives for lot consolidation.*

Quantified Objective: *Encourage development of 40 lower-income units in high resource areas.*

28. Large Lot Development

To facilitate the development of large lots for affordable housing and provide for development phasing for development of 50 to 150 units, the County will give high priority to processing housing developments that include affordable housing units on lots larger than 10 acres and provide incentives on a case-by-case basis for development of high-density residential on large sites.

Additionally, to ensure the program is successful, the County will reach out to developers annually, and as projects are processed, of affordable housing and incorporate necessary strategies such as ministerial lot splits or other incentives to encourage parceling at appropriate sizes (e.g., 1-10 acres) to facilitate affordable developments.

Responsible Agency: *Planning and Development Services Department*

Funding Source: *General Fund (staff time)*

Timeframe: *Ongoing, as projects are processed through the Planning Department and incentives will be adopted within one year of adoption of the Housing Element. Annually meet with developers.*

Quantified Objective: ~~*287*~~*550 lower-income units integrated with moderate- and above moderate-income units to promote housing mobility opportunities, equitable access to resources, and mixed-income neighborhoods.*

Quantified Objectives

State Housing Law requires that each jurisdiction establish the projected number of housing units that will be constructed, rehabilitated, and preserved over the planning period. The Quantified Objectives for the Housing Element reflect the planning period from October 15, 2021, through October 15, 2029. Refer to Table 1.

It is important to note that while the Quantified Objectives are required to be part of the Housing Element and the County will strive to obtain these objectives, the County cannot guarantee that these needs will be met given limited financial and staff resources, the current development climate in the county, and the changing gap in the affordability of housing resources and incomes. Satisfaction of the County's share of regional housing needs will depend heavily on the cooperation of private funding sources and developers, as well as resources of the state, federal, and County programs that are used to support the needs of the lower-income and special-needs households. Additionally, outside economic forces heavily influence the housing market. Current economic challenges have chilled much of the activity in the new housing market. The Quantified Objectives assume optimum conditions for the production of housing; however, environmental, physical, and market conditions exert influence on the timing, type, and cost of housing production in a community. State law recognizes that a locality may not be able to accommodate its regional fair-share housing need.

TABLE 1

QUANTIFIED OBJECTIVES, 2021-2029

Program		Extremely Low	Very Low	Low	Moderate	Above Moderate
RHNA		601	602	596	580	1,922
New Construction						
45	Acquisition, Rehabilitation, and Construction of Affordable Housing	0	0	30	0	0
67	Update Density Bonus	5	10	15	0	0
910	ADU Incentives	2	3	3	4	1
1011	Housing for Special-Needs Groups	10	15	25	0	0
1314	Support Affordable Housing Development	50	150	150	0	0
1819	Development of Housing for Extremely Low-Income Households	20	0	0	0	0
Rehabilitation						
1112	Farmworker Assistance	5	5	0	0	0
2122	Housing Rehabilitation	25	25	50	0	0
Conservation						
23	At-Risk Properties	0	0	24	0	0

Program	Extremely Low	Very Low	Low	Moderate	Above Moderate

		RHNA	601	602	596	580	1,922
	New Construction						
2	Infrastructure Availability and Coordination		250	250	500		
3	Specific Plan Development*		15	50	222		
5	Acquisition, Rehabilitation, and Construction of Affordable Housing		0	0	50	0	0
7	Update Density Bonus		5	10	15	0	0
9	ADU Incentives		~~2~~5	~~3~~5	~~3~~10	4	1
10	Housing for Special-Needs Groups		15	20	40	0	0
12	Assistance for Service Providers		~~5~~15	~~5~~15	~~10~~22	0	0
13	Support Affordable Housing Development		50	150	150	0	0
18	Development of Housing for Extremely Low-Income Households		40	0	0	0	0
26	Development Streamlining		5	5	10	0	0
27	Small Lot Development		5	10	25	0	0
28	Large Lot Development		100	200	250		
	Rehabilitation						
11	Farmworker Assistance		20	20	10	0	0
21	Housing Rehabilitation		25	25	50	0	0
22	Code Enforcement		0	15	25	10	0
	Conservation						
4	Colonia Master Plan		50	75	125	0	0
5	Acquisition, Rehabilitation, and Construction of Affordable Housing		~~10~~50	~~10~~50	~~10~~100	0	0
23	At-Risk Properties		0	0	24	0	0
19	Fair Housing Outreach		10	20	20	15	15

Source: Imperial County, 2021
**Program 28 accounts for Specific Plan units as well and is therefore not included here to avoid duplication.*

IV. Public Participation

State law requires cities and counties to make a "diligent effort" to achieve participation by all segments of the community in preparing a Housing Element (California Government Code Section 65583(c)(6)). State law requires cities and counties to take active steps to inform, involve, and solicit input from the public, particularly groups and organizations representing the interests of lower-income and minority households that might otherwise not participate in the process.

To meet the requirements of state law, Imperial County has completed public outreach and encouraged community involvement, as described herein.

Stakeholder Consultations

To ensure that the County was soliciting feedback from all segments of the communities in unincorporated Imperial County and to target stakeholders and other organizations that represent lower-income and special needs households, consultations were conducted with service providers and other stakeholders who represent different socio-economic groups. Between January and February 2021, Imperial County reached out to 10 agencies through several attempts. Of these, three responded and consultations were conducted with stakeholders to offer the opportunity for each to provide one-on-one input. The following stakeholders were interviewed:

- Campesinos Unidos – January 26, 2021
- Imperial Valley Housing Authority – February 9, 2021
- Imperial County Department of Social Services – February 12, 2021

In each of the consultations, the stakeholders were asked the following questions:

1. What are the three top opportunities you see for the future of housing in unincorporated Imperial County? What are your three top concerns for the future of housing in unincorporated Imperial County?

2. What types of housing do your clients prefer? Is there adequate rental housing in the unincorporated areas of Imperial County? Are there opportunities for home ownership? Are there accessible rental units for seniors and persons with disabilities?

3. Where have your clients been able to afford housing, if at all? What continues to be a struggle in allowing your clients/people you serve to find and keep affordable, decent housing?

4. What are the biggest barriers to finding affordable, decent housing? Are there specific unmet housing needs in the unincorporated communities?

5. How do you feel about the physical condition of housing in Imperial County? What opportunities do you see to improve housing in the future?

All stakeholders emphasized a shortage of affordable housing units and a great demand for rental assistance, beyond what is currently available. When asked about other concerns, stakeholders reiterated that addressing housing barriers in Imperial County begins with meeting affordability needs and incentivizing this type of housing should be a priority. Stakeholders expressed concern that the shortage of affordable housing presents challenges for residents to access jobs and live in safe, healthy conditions. Comments received through the consultation process were used to inform updates to the Housing Element goals, policies, and programs and in the assessment of fair housing issues.

Community Workshops

On April 27 and April 28, 2021, the County hosted two online community workshops to introduce the public to the Housing Element update process and state requirements and solicit input on housing needs, preferences, and locations. The County provided advanced notice of these meetings by distributing flyers in both English and Spanish to stakeholder organizations, affordable housing providers, and community organizations. At each meeting, conducted via Zoom, the County offered a Spanish-language breakout room in addition to the English presentation, though no attendees took advantage of this option.

The April 27 meeting was held online over the standard lunch break and had 11 attendees. Participants asked about a potential partnership between the County and San Diego State University to discuss student housing needs at a proposed campus near the City of Brawley and whether family units are being lost as they are converted to farm labor (H2A) housing. The County confirmed that working with the university, if the land is not annexed by the City of Brawley, is a great opportunity to provide affordable housing near educational and employment opportunities. Additionally, the County explained that there has been conversion of farm housing to employee housing but building permits have not shown a conversion, or loss of, family units for H2A housing.

There were two attendees at the April 28 meeting, though no public comment was made.

Noticing of the Draft Housing Element

The County released the Public Review Draft of the 2021-2029 Housing Element on July 8, 2021 for review and comment. The draft was available on the County's website and, in an effort to reach all segments of the community, direct noticing was sent to community meeting attendees and groups and individuals interested in the Housing Element update process. Public comment was encouraged throughout the duration of the 60-day review period of the Housing Element. The revised public review draft was posted to the County's website on December 13, 2 weeks prior to resubmittal to HCD. Direct noticing was sent to local agencies, neighborhood groups and individuals interested in the Housing Element update process.

Public Comment

County staff received public comment from the Naval Air Facility (NAF) El Centro on August 9, 2021. The NAF requested noise abatement be considered in the goals of the Housing Element to ensure compatibility between new residential development and NAF operation. The County incorporated this change into Goal 8 of the Housing Element. No additional public comment ~~was~~has been received on the Draft Housing Element but if comments are received, they will be reviewed and summarized in the housing element.~~ ... This section will be updated after public comment is received.~~

V. General Plan Consistency

According to State law, a jurisdiction's General Plan and its elements must be integrated, internally consistent, and a compatible statement of policies. The purpose of the Housing Element is to support and identify an adequate supply of housing affordable to lower-income households by providing guidance in the development of future plans, procedures, and programs, and by removing governmental constraints to housing production. The Housing Element has detailed goals, policies, and specific measures. Under State law, the entire General Plan is required to be "internally consistent," meaning that all elements of the General Plan have equal legal status and no policy within the General Plan can directly conflict with another.

Concurrently with this Housing Element update, the Seismic and Public Safety and Environmental Justice Elements, are being reviewed and updated to bring them into compliance with State law. The Land Use Element was reviewed as part of the Housing Element update to ensure consistency between land uses and zoning as well as other General Plan components. The concurrent process has ensured consistency between the Housing Element and other General Plan elements. The County will continue to review and revise the Housing Element, as necessary for consistency, when amendments are made to the General Plan. Additionally, in compliance with Senate Bill (SB) 244, the County is in the process of conducting an analysis of disadvantaged unincorporated communities, defined as a community in which the median household income is 80 percent or less than the statewide median household income. This effort will include coordination with the Colonias Master Plan.

Appendix A: Housing Needs Assessment

Data Sources

This chapter analyzes population, housing, employment opportunities, and income characteristics, identifies special housing needs, and evaluates the condition of the housing stock and other important information to support the goals, policies, and programs to meet the needs of the citizens of Imperial County. In preparing this chapter, various sources of information were used. The County relied on the United States (US) Census, American Community Survey (ACS), California Department of Finance (DOF), California Employment Development Department (EDD), and other available local sources.

The US Census, which is completed every 10 years, is an important source of information for the Housing Needs Assessment. It provides the most reliable and in-depth data for demographic characteristics of a locality. The ACS is conducted by the US Census Bureau and provides estimates of numerous housing-related indictors based on samples averaged over a five-year period. The Housing Needs Assessment reflects the 2015-2019 ACS data.

The DOF is another source of valuable data and is more current than the US Census. However, the DOF does not provide the depth of information that can be found in the US Census Bureau reports. The California Employment Development Department provides employee and industry data and projections that are more specific than what is often available through the US Census. Whenever possible, DOF or Employment Development Department data and other local sources were used in the Housing Needs Assessment to provide the most current profile of the community.

Wherever available, the County used data compiled by the Southern California Association of Governments (SCAG). The SCAG dataset primarily consisted of data from the US Census and various ACS datasets. Due to the wide margin of error in ACS data and the variety of sources used, there may be discrepancies between statistics in this analysis. Additionally, where unincorporated county data was not available, data from incorporated cities in the county were summed and subtracted from the overall county total to arrive at an unincorporated county estimate. For instances in which this method was not feasible or appropriate, countywide data is reported. Demographic information for townsites was extrapolated from Census-Designated Places (CDP) data and/or from city and total county data.

Because of the difference in data sources, some figures (e.g., population or the number of households) may vary in different sections. For example, DOF reports estimates for unincorporated Imperial County as the difference between totals for the whole county and the sum of incorporated areas, while ACS reports estimates that include only census-designated places in the unincorporated county. Additionally, the sum of data in tables may not total precisely due to rounding.

Unincorporated Townsites

Unincorporated Imperial County consists of 10 townsites: Bombay Beach, Desert Shores, Heber, Niland, Ocotillo/Nomirage, Palo Verde, Salton City/Vista Del Mar, Salton Sea Beach, Seeley, and Winterhaven. These townsites serve as the population centers, and future population growth will be directed to these areas. Table A-1 provides an overview of each townsite, including population, housing units, and location.

TABLE A-1
IMPERIAL COUNTY TOWNSITES

Townsite	Population	Existing Housing Units	Location
Bombay Beach	297	375	East shore of the Salton Sea, south of State Highway 111
Desert Shores	574	520	West shore of the Salton Sea, east of State Highway 86
Heber	3,604	1,097	Between Calexico and El Centro
Niland	631	315	North-central portion of the county, south of the Union Pacific Railroad
Ocotillo/ Nomirage	89	304	Southwestern portion of the county, just north of the United States/Mexico international boundary
Palo Verde	65	175	Northeastern portion of the county, along State Highway 78
Salton City/Vista Del Mar	6,250	2,928	West shore of the Salton Sea
Salton Sea Beach	261	179	Northwest portion of the county on State Highway 86
Seeley	2,010	669	Six miles west of El Centro
Winterhaven	192	215	Southeastern most portion of the county

Source: 2015-2019 ACS

Demographic and Employment Characteristics

Population Trends

According to the DOF, the total population of Imperial County was 188,777 in 2020, an increase of 8.2 percent since 2010. The population of the unincorporated county increased 4.3 percent over the same period, from 37,778 to 39,420.

According to the ACS, Salton City saw the greatest growth, surpassing Heber as the most populated townsite in the unincorporated county, with a population of 6,250 in 2019, a 346-percent increase from 1,400 in 2010. Salton City, Desert Shores, and Seeley were the only unincorporated townsites that experienced growth, all others saw decreases in population ranging from a 1-percent decrease (Bombay Beach) to a 78-percent decrease (Winterhaven). Refer to Table A-2 for population trends in the unincorporated county and Imperial County as a whole.

TABLE A-2
POPULATION TRENDS

Townsite	2010	2020	Change	
			Number	Percentage
Brawley	24,953	27,349	2,396	9.6%
Calexico	38,572	40,896	2,324	6.0%
Calipatria	7,705	6,843	-862	-11.2%
El Centro	42,598	45,657	3,059	7.2%
Holtville	5,939	6,359	420	7.1%
Imperial	14,758	19,907	5,149	34.9%
Westmorland	2,225	2,346	121	5.4%
Total Incorporated County	136,750	149,357	12,607	9.2%
Total Unincorporated County *	37,778	39,420	1,642	4.3%
Total County	174,528	188,777	14,249	8.2%

Source: California DOF, City/County Population and Housing Estimates

** Includes all unincorporated areas, beyond just census-designated places.*

Age Characteristics

Current and future housing needs are determined, in part, by the age characteristics of residents. For many, housing needs change based on stage of life. Young professionals, growing families, seniors, and residents with a wide variety of other lifestyles have unique housing preferences and financial situations.

Persons aged 25 to 44 are considered to be in the family-forming age group. According to the 2015-2019 ACS data, this age group represents 24.8 percent of the population in the unincorporated county. Residents aged 65 and older are considered to be of retirement age and account for 18.1 percent of the population in the unincorporated county. The retirement age group makes up a slightly smaller portion of the population than the family-forming age group. This could suggest that Imperial County has more appeal to the working-age population than to persons of retirement age. Refer to Table A-3 for a breakdown of the population by age group for the unincorporated county and for Imperial County as a whole.

TABLE A-3
AGE CHARACTERISTICS, 2019

Age Group	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
< 5 years	1,179	8.7%	15,080	8.3%
5 to 14 years	1,585	11.7%	28,395	15.7%
15 to 24 years	2,114	15.6%	27,101	15.0%
25 to 34 years	1,683	12.4%	26,562	14.7%
35 to 44 years	1,683	12.4%	22,086	12.2%
45 to 54 years	1,288	9.5%	20,156	11.2%
55 to 64 years	1,580	11.6%	18,480	10.2%
65 to 74 years	1,422	10.5%	12,818	7.1%
75 to 84 years	865	6.4%	7,022	3.9%
85+ years	174	1.3%	3,001	1.7%
Total	13,573	100.0%	180,701	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Race and Ethnicity

According to the 2015-2019 ACS, white residents represented the largest race group in the unincorporated county and Imperial County as a whole, accounting for 70.9 percent and 65.1 percent of residents, respectively. Persons of Hispanic origin, who may identify with any race, made up a significant portion of the population. Approximately 76.2 percent of residents were of Hispanic origin in the unincorporated county and 84.2 percent of the countywide population was Hispanic. Refer to Table A-4 for detailed figures on race and ethnicity in the unincorporated county and in Imperial County as a whole.

TABLE A-4
POPULATION BY RACE, 2019

Race/Ethnicity	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
White alone	9,906	70.9%	117,658	65.1%
Black of African American alone	296	2.1%	4,489	2.5%
American Indian and Alaska Native alone	182	1.3%	1,912	1.1%
Asian alone	81	0.6%	2,680	1.5%
Native Hawaiian and Other Pacific Islander alone	24	0.2%	309	0.2%
Some other race alone	3,189	22.8%	47,139	26.1%
Two or more races	295	2.1%	6,514	3.6%
Total	13,973	100.0%	180,701	100.0%
Hispanic or Latino	10,646	76.2%	152,172	84.2%
Not Hispanic or Latino	3,327	23.8%	28,529	15.8%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Household Characteristics

A household is defined as any group of people living together in a residence, whether related or unrelated. Household size and composition information can indicate the type of housing that may be appropriate for county residents. According to the DOF, there were 35,331 households in the unincorporated county in 2020, an increase of approximately 9.1 percent since 2010. The household population increased by approximately 10.1 percent for the county as a whole for the same period.

Table A-5 shows household growth trends in the unincorporated county and in Imperial County as a whole from 2010 to 2020.

TABLE A-5
HOUSEHOLD GROWTH TRENDS, 2010-2020

Area	2010	2020	Change	
			Number	Percentage
Unincorporated County *	32,379	35,331	2,952	9.1%
Total County	163,844	180,378	16,534	10.1%

Source: California DOF, City/County Population and Housing Estimates

** Includes all unincorporated areas, beyond just census-designated places.*

Household Size

According to the 2015-2019 ACS, the average household in Imperial County was 3.81 persons (countywide) as of 2019. Approximately 63.4 percent of households in the unincorporated county were one- or two-person households, 16.1 percent were three-person, and 20.4 percent were households with four or more persons. Owner-occupied households had a higher percentage of smaller, one- or two-person households.

In the county as a whole, approximately 46.6 percent of households were one- or two-person, 17.5 percent were three-person, and 36.0 percent were households with four or more persons. Refer to Table A-6 for household size by tenure in the unincorporated county and in Imperial County as a whole.

TABLE A-6
HOUSEHOLD SIZE BY TENURE

Household Size	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
Owner-occupied	3,155	68.5%	26,156	58.3%
1-person	1,285	40.7%	5,022	19.2%
2-person	1,008	31.9%	7,579	29.0%
3-person	382	12.1%	4,382	16.8%
4-or-more person	480	15.2%	9,173	35.1%
Renter-occupied	1,452	31.5%	18,673	41.7%
1-person	339	23.3%	4,213	22.6%
2-person	290	20.0%	4,054	21.7%
3-person	362	25.0%	3,465	18.6%
4-or-more person	461	31.7%	6,941	37.2%
Total Households	4,607	100.0%	44,829	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Income Characteristics

The California Department of Housing and Community Development (HCD) publishes annual income limits for each county that are used to determine eligibility for assisted housing programs. Income levels are described in the following categories:

- Extremely low-income: Earns up to 30 percent of the area median income (AMI)
- Very low-income: Earns between 31 and 50 percent of the AMI
- Low-income: Earns between 51 and 80 percent of the AMI
- Moderate-income: Earns between 81 and 120 percent of the AMI
- Above-moderate-income: Earns more than 120 percent of the AMI

Limits for each income category are based on a percentage of the county's median income. For Imperial County, the median income for a household of four was $70,700 in 2020. The income limits by household size for 2020 are provided in Table A-7.

TABLE A-7
IMPERIAL COUNTY INCOME LIMITS, 2020

Income Category	Number of Persons in Household							
	1	2	3	4	5	6	7	8
Extremely Low	$14,700	$17,240	$21,720	$26,200	$30,680	$35,160	$39,640	$44,120
Very Low	$24,500	$28,000	$31,500	$34,950	$37,750	$40,550	$43,350	$46,150
Low	$39,150	$44,750	$50,350	$55,900	$60,400	$64,850	$69,350	$73,800
Median	$49,500	$56,550	$63,650	$70,700	$76,350	$82,000	$87,650	$93,300
Moderate	$59,400	$67,900	$76,350	$84,850	$91,650	$98,450	$105,200	$112,000

Source: HCD 2020 State Income Limits

Table A-8 provides a summary of households in the unincorporated county and county as a whole according to the 2015-2019 ACS. Approximately 75.1 percent of households in the unincorporated county were considered lower income, earning less than 80 percent of the AMI.

TABLE A-8
HOUSEHOLDS BY INCOME CATEGORY (4-PERSON HOUSEHOLDS)

Income Category	Unincorporated County		Total County*	
	Estimate**	Percentage	Estimate**	Percentage
Extremely Low	1,969	41.5%	13,882	31.0%
Very Low	649	13.7%	3,805	8.5%
Low	941	19.9%	7,443	16.6%
Moderate	628	13.2%	7,428	16.6%
Above Moderate	553	11.7%	12,271	27.4%
Total Households	4,740	100.0%	44,829	100.0%

Source: 2015-2019 ACS; HCD 2020 State Income Limits
**Total County includes both incorporated and unincorporated communities.*
***The income breaks reported by the ACS vary slightly from the income category breaks determined by HCD; therefore, the numbers reported here are estimates based on the comparison of these data sources. The actual number of units in each income category, and the total, may therefore vary slightly.*

~~***The income breaks reported by the ACS vary slightly from the income category breaks determined by HCD; therefore, the numbers reported here are estimates based on the comparison of these data sources.*~~

Employment

According to 2015-2019 ACS estimates, there were 4,958 jobs in the unincorporated area of Imperial County in 2019. The largest industries of employment were education, health, and social services (922 employees); arts, entertainment, recreation, and accommodation and food services (790 employees); and agriculture, forestry, fishing and hunting, and mining (711 employees). Refer to Table A-9 for the number of jobs by industry type in the unincorporated county.

TABLE A-9
EMPLOYMENT BY INDUSTRY, UNINCORPORATED COUNTY

Area	Number	Percentage
Agriculture, forestry, fishing and hunting, and mining	711	14.3%
Construction	412	8.3%
Manufacturing	298	6.0%
Wholesale trade	65	1.3%
Retail trade	532	10.7%
Transportation and warehousing, and utilities	319	6.4%
Information	46	0.9%
Finance and insurance, and real estate and rental and leasing	143	2.9%
Professional, scientific, and management, and administrative and waste management services	294	5.9%
Educational services, and health care and social assistance	922	18.6%
Arts, entertainment, and recreation, and accommodation and food services	790	15.9%
Other services, except public administration	211	4.3%
Public administration	215	4.3%
Total	4,958	100.0%

Source: 2015-2019 ACS

Table A-10 shows California's Employment Development Department employment projections from 2016 through 2026 as related to growth in absolute number of jobs in the El Centro Metropolitan Statistical Area (MSA). During the next five years, the El Centro MSA expects the greatest growth in employment in private educational services, healthcare, and social assistance.

TABLE A-10
EMPLOYMENT PROJECTIONS, EL CENTRO MSA

Occupation Group	Employment Estimate		Change	
	2018	2028*	Number	Percentage
Total Farm	11,400	10,400	-1,000	-8.8%
Mining, Lodging, and Construction	1,800	2,000	200	11.1%
Manufacturing	1,400	1,700	300	21.4%
Trade, Transportation, and Utilities	12,300	13,200	900	7.3%
Information	300	300	0	0.0%
Financial Activities	1,300	1,300	0	0.0%
Professional and Business Services	2,600	2,900	300	11.5%
Educational Services (Private), Healthcare, and Social Assistance	8,400	11,200	2,800	33.3%
Leisure and Hospitality	4,300	5,200	900	20.9%
Other Services	900	1,000	100	11.1%
Government	18,900	21,000	2,100	11.1%

Source: California Employment Development Department 2018-2028 Industry Sector Employment Projections
**Projected*

Special Needs Groups

This section identifies special needs households in Imperial County. This assessment is essential because a major part of the County's role in providing opportunities for affordable housing is to preclude barriers to residents whose needs are not normally met by the private sector. This segment of the county's population is constrained by the housing market not only because of lower incomes but also because of the lack of housing that is suitable to their special needs.

Extremely Low-Income Households

Extremely low-income households are those earning 30 percent or less of the AMI. In 2020, the upper limit of this income category was $26,200 for a family of four in Imperial County. Those with the lowest incomes may experience the greatest challenges in finding suitable, affordable housing. Extremely low-income households often have a combination of housing challenges related to income, credit status, disability or mobility status, family size, household characteristics, supportive service needs, or a lack of affordable

housing opportunities. These households typically include seniors on Social Security, individuals with disabilities, single parents, farmworkers, and low-wage workers. Some extremely low-income individuals and households are homeless.

Many extremely low-income households seek rental housing and most likely face overpayment, overcrowding, or substandard housing condition. Some extremely low-income households could have members with mental or other disabilities and special needs.

According to the 2015-2019 ACS, approximately 41.5 percent of households (or 1,969 households) in unincorporated Imperial County were extremely low-income (Table A-8). Of these households, approximately 66 percent were homeowners. The County relied on ACS data rather than the United States Department of Housing and Urban Development's (HUD's) Comprehensive Housing Affordability Strategy (CHAS) to determine the number of extremely low-income households as CHAS data estimates this number of the whole of Imperial County while estimates for unincorporated Imperial County are available through ACS.

The County has included Programs ~~4~~5, ~~9~~10, ~~10~~11, ~~13~~14, ~~17~~18, and ~~21~~ 22 to provide the following that could assist extremely low-income households:

- Support the Imperial Valley Housing Authority with acquiring and rehabilitating existing multifamily units to be converted to affordable housing, affordable to extremely low-, very low-, and low-income households.
- Provide regulatory incentives such as permitting reduced lot sizes, reduced site setbacks, and off-street parking to lessen land costs for housing development to incentivize construction of housing affordable to extremely low-income households. The County will take subsequent action, as appropriate, to make the development of such units more financially feasible, including supporting the use of federal and state funding resources for local housing needs and programs and providing financial incentives, such as reducing, waiving, and/or deferring fees, where feasible, offering fast-track/priority processing, and density bonuses.
- Seek funding to rehabilitate existing farmworker housing and construct new units.
- Distribute public information regarding local service organizations, homeless and community assistance programs, including the Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program, and emergency shelters/transitional housing by maintaining updated information available at the "storefront" locations at the Planning and Development Services offices and on the County's website.
- Collaborate with the Imperial Valley Continuum of Care and other nonprofit organizations that provide emergency shelter and other support services to promote community-wide planning and strategic use of resources to address homelessness.
- Encourage the development of housing for extremely low-income households through a variety of activities, such as outreach to housing developers on an annual basis, providing financial assistance

(when feasible) or in-kind technical assistance or land write-downs, providing expedited processing, identifying grant and funding opportunities, applying for or supporting applications for funding on an ongoing basis, reviewing and prioritizing local funding at least twice in the planning period, and/or offering additional incentives beyond the density bonus.

- Continue to operate housing rehabilitation and weatherization programs that assist lower-income households occupying housing in need of repair.

Senior Households

Many seniors live on a low, fixed income and have physical disabilities and dependence needs that make it difficult for them to find suitable affordable housing. There are heavy concentrations of senior households in the outlying desert "retirement" communities in the unincorporated county. According to the 2015-2019 ACS, 18.1 percent of the population, or 2,461 persons, in the unincorporated county were 65 years and older, as of 2019 (see Table A-3).

As shown in Table A-11, there were 1,428 senior householders in the unincorporated county as of 2019. Among these householders, approximately 84.7 percent resided in owner-occupied units.

TABLE A-11
SENIOR HOUSEHOLDS BY TENURE, UNINCORPORATED COUNTY

Age	Number	Percentage of Households
Total Owner-Occupied	3,211	68.6%
Owners aged 65 to 74 years	712	22.2%
Owners aged 75 to 84 years	431	13.4%
Owners aged 85 years and over	66	2.1%
Total Senior Owners	1,209	37.7%
Total Renter-Occupied	1,469	31.4%
Renters aged 65 to 74 years	143	9.7%
Renters aged 75 to 84 years	58	3.9%
Renters aged 85 years and over	18	1.2%
Total Senior Renters	219	14.9%
Total Occupied Households	4,680	100.0%
Householder aged 65 to 74 years	855	18.3%
Householder aged 75 to 84 years	489	10.4%
Householder aged 85 years and over	84	1.8%
Total Senior Householder	1,428	30.5%

Source: 2015-2019 ACS

Table A-12 lists care facilities for seniors and disabled persons in Imperial County along with the capacity of each facility.

TABLE A-12
CARE FACILITIES FOR SENIORS AND/OR DISABLED PERSONS

Facility Name	Address	Total Capacity (persons)
Imperial Manor	100 East 2nd Street, Imperial	31
Royal Convalescent Home	320 Cattle Call Drive, Brawley	99
A&A Cottage View Assisted Living, Inc.	103 S Haskell Drive, El Centro	14
Blossom Valley Inn	708 East 5th Street, Holtville	175
Casa Elite	1785 Citrus Lane, El Centro	8
Heart & Hand, Inc.	499 South Sunset Drive, El Centro	14
Parkside Villa Assisted Living	1685 Cypress Drive, El Centro	15
Vintage Village 2	1203 Driftwood, El Centro	6
Vintage Village Assisted Living	921 Ocotillo, El Centro	6
Baird Board and Care #1	1937 Mount Signal Avenue, Seeley	4
Mazeroll Residential Services	286 W. Cancun Road, Imperial	6
Serenity Home	804 Kemp Court, Calexico	6
Smoketree	1663 Smoketree Drive, El Centro	6
Sunset Home	1878 South Second Street, El Centro	6
Tender Loving Care Home	151 West "K" Street, Brawley	6
Tender Loving Care II	286 W. Duarte Street, Brawley	4
Villa Nayarit	412 S. C Street, Imperial	4

Source: California Department of Social Services 2021; hospital-data.com 2021; seniorcarehomes.com 2021

Persons with Disabilities

Persons with disabilities have special housing needs because of employment and income challenges; need for accessible, affordable, and appropriate housing; and higher healthcare costs associated with a disability. A disability is defined by the US Census Bureau as a physical, mental, or emotional condition that lasts over a long period of time and makes it difficult to live independently.

Living arrangements of disabled persons depend on severity of disability. Many disabled persons live in their own home, in an independent situation, or with other family members. The US Census collects data for several categories of disability. The ACS defines six aspects of disability: hearing, vision, cognitive, ambulatory, self-care, and independent living.

- Hearing difficulty: Deafness or serious difficulty hearing
- Vision difficulty: Blindness or serious difficulty seeing even when wearing glasses
- Cognitive difficulty: Serious difficulty concentrating, remembering, or making decisions due to a physical, mental, or emotional condition
- Ambulatory difficulty: Serious difficulty walking or climbing stairs
- Self-care difficulty: Difficulty dressing or bathing (Activities of Daily Living [ADL])
- Independent living difficulty: difficulty doing errands alone, such as visiting a doctor's office or shopping due to a physical, mental, or emotional condition

As shown in Table A-13, approximately 15.1 percent of the unincorporated Imperial County population and 14.4 percent of the county as a whole had some type of disability, according to ACS estimates.

TABLE A-13
PERSONS WITH DISABILITY

Type of Disability	Age Group			With a Disability	Total Population	Percentage with a Disability
	Under 18 Years	18-64 Years	65+ Years			
Unincorporated Imperial County						
Hearing Difficulty	0	143	301	444	13,939	15.1%
Vision Difficulty	22	112	137	271		
Cognitive Difficulty	56	460	204	720		
Ambulatory Difficulty	0	499	611	1,110		
Self-Care Difficulty	0	118	198	316		
Independent Living Difficulty	--*	313	402	715		
Total Imperial County						
Hearing Difficulty	224	1,728	3,498	5,450	170,981	14.4%
Vision Difficulty	522	1,698	2,016	4,236		
Cognitive Difficulty	1,672	4,910	3,299	9,881		
Ambulatory Difficulty	192	5,770	7,545	13,507		
Self-Care Difficulty	427	2,603	3,438	6,468		
Independent Living Difficulty	--*	4,465	5,381	9,846		

Source: 2015-2019 ACS

Developmental Disabilities

According to Section 4512 of the Welfare and Institutions Code, "developmental disability" means a disability that originates before an individual reaches 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. It includes intellectual disabilities, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with intellectual disabilities but does not include other conditions that are solely physical in nature.

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

The California Department of Developmental Services (DDS) provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, 4 developmental centers, and 2 community-based facilities. The San Diego Regional Center is one of 21 regional centers in California that provides point of entry to services for people with developmental disabilities. The San Diego Regional Center has a field office in the City of Imperial, which provides services to all of Imperial County. The center is a private, nonprofit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

According to the DDS, using data compiled from the San Diego Regional Center, in September 2020, the Imperial County field office served approximately 620 developmentally disabled residents in the unincorporated County. Refer to Table A-14 for an estimate of the number of developmentally disabled residents by age in Imperial County.

TABLE A-14

IMPERIAL COUNTY DEVELOPMENTALLY DISABLED RESIDENTS

ZIP Code	0-17 Years	18+ Years	Total
92222 (Bard)	<11	0	>0
92227 (Brawley)	314	150	464
92231 (Calexico)	394	224	618
92233 (Calipatria)	51	20	71
92243 (El Centro)	530	343	873
92249 (Heber)	100	40	140
92250 (Holtville)	46	39	85
92251 (Imperial)	248	117	365

ZIP Code	0-17 Years	18+ Years	Total
92257 (Niland/Bombay Beach)	248	117	365
92259 (Ocotillo)	<11	0	>0
92266 (Palo Verde)	-	-	-
92275 (Salton City)	<11	<11	>0
92273 (Seeley)	27	17	44
92281 (Westmorland)	33	<11	>33
92283 (Winterhaven)	16	<11	>16
Total, All Incorporated Cities	1,616	<904	<2,520
Total, Unincorporated Area of County	<424	<196	<620
Total, County	<2,040	<1,100	<3,140

Source: California DDS, Consumer County by California Zip Code and Age Group

Note: These represent available estimates and the "<" denotes potential for error.

There are a number of housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, low-income housing, Section 8 vouchers, special programs for home purchase, HUD housing, and Senate Bill (SB) 962 homes. The design of housing-accessibility modifications, proximity to services and transit, and availability of group living opportunities represent the types of considerations important in serving this need group. Incorporating 'barrier-free' design in all new multifamily housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to affordability of housing, as people with disabilities may be living on a fixed income. The County has included Program ~~16~~ 17 to coordinate with service providers for individuals with developmental disabilities and ensure there is adequate supportive housing to meet residents' needs.

Large Households

HUD defines a large-family household as one with five or more members. Large-family households require housing units with more bedrooms than housing units needed by smaller households. In general, housing for these households should also provide safe outdoor play areas for children and be located to provide convenient access to schools and childcare facilities. These types of needs can pose problems, particularly for large families that cannot afford to buy or rent single-family houses, as apartment and condominium units are most often developed with childless, smaller households in mind.

According to the 2014-2018 ACS, approximately 13.6 percent of households (1,289 households) in the unincorporated county contained five or more persons. Of these households, 68.7 percent (886 households) were owners and 31.3 percent (403 households) were renters. Data on household size was not reported as part of the 2015-2019 ACS; therefore, the County relied on the 2014-2018 ACS data to estimate the number of large households in unincorporated areas.

According to the 2014-2018 ACS, 61.2 percent of the total housing units in the unincorporated county had three or more bedrooms (4,148 units), while just 1.7 of all housing units have five or more bedrooms (114 units) to accommodate large households without any overcrowding.

Single-Parent and Female-Headed Households

Single-parent households are male- or female-headed households with children under the age of 18 living at home. Single-parent households often have lower incomes than two-parent households and may have special needs relating to childcare, healthcare, and housing. Female-headed households tend to have lower incomes, which limits opportunities to find housing of an adequate size at an affordable price.

According to the 2015-2019 ACS, approximately 8.4 percent, or 388, of County households were single-parent households with a male householder and approximately 12.8 percent, or 590, were single-parent households with a female householder. Refer to Table A-15 for data regarding single-parent and female-headed households in unincorporated Imperial County.

TABLE A-15
SINGLE-PARENT AND FEMALE-HEADED HOUSEHOLDS, UNINCORPORATED COUNTY

Householder	Number	Percentage of Total Households
Male householder, no spouse present	388	8.4%
With own children under 18 years	162	3.5%
Female householder, no spouse present	590	12.8%
With children under 18 years	187	4.1%
Total Single-Parent Households	1,327	100.0%
Total Households (all)	4,607	

Source: 2015-2019 ACS

Note: Includes only census-designated places in unincorporated Imperial County.

Native Americans

There are two federally recognized tribal reservations in Imperial County – the Quechan Tribe and the Torres-Martinez Desert Cahuilla Indians. According to the US Bureau of Reclamation, there were 3,870 members of the Quechan Tribe, of whom, 2,022 resided on or adjacent to the reservation in Imperial County in 2018. Based on the 2010 Census, SCAG estimates the Torres-Martinez Desert Cahuilla Indian population consists of approximately 5,594 residents. The Torres-Martinez tribal population resides in Riverside and Imperial Counties.

Native American populations may have special needs due to lower incomes and a lack of access to resources. The Torres-Martinez Tribal Temporary Assistance for Needy Families (TANF) program provides temporary assistance to Native American families with children. The program offers housing-related assistance, as well as social services, including childcare assistance and employment training. Housing

assistance is provided through temporary cash for housing and utilities or emergency shelter expenses. The local TANF office is located in Thermal (66725 Martinez Road).

Farmworkers

Imperial County is located in one of the most productive agricultural regions in the United States. While agriculture is a year-round activity in the county, agricultural activity peaks between November and February and reaches the lowest ebb during the months of July, August, and September. According to SCAG, which calculated unincorporated farming jobs from the 2014-2018 ACS 5-Year Estimates, approximately 945 residents were identified as having a farming occupation. According to the 2017 U.S. Department of Agriculture (USDA) Census of Agriculture, there were 7,934 hired farm workers in Imperial County, including both incorporated and unincorporated areas (see Table A-15A). Of those farm workers, the majority (4,634 persons) were permanent employees, working more than 150 days per year. The remaining farmworkers (3,714 persons) were seasonal employees, and 1,057 of farmworkers were migrant.

TABLE A-15A
FARM WORKERS, 2017

	Imperial County
Hired Farm Workers	7,934
Permanent Employees (more than 150 days)	4,634
Seasonal Employees (less than 150 days)	3,330
Migrant Workers	1,057
Source: USDA 2017 Census of Agriculture	

Many farmworkers earn relatively low wages. According to the California Economic Development Department's occupational profile, agricultural workers in Imperial County earned an average hourly wage of $14.14 as of the first quarter of 2020. The majority of the farmworkers in the county are of Hispanic descent. Many are migrant, generally residing in the county for four to six months out of the year and moving to other areas for the remainder of the year. This creates a fluctuating demand for rental units, with the highest demand occurring during the winter and spring months.

Imperial County's proximity to Mexicali, Mexico, where a large portion of the farm labor pool resides, affords many farm laborers the ability to continue to live in Mexicali where rents are less than in Imperial County. These farm laborers commute on a daily basis via personal vehicle, carpool, public transportation, or employer-supplied busing, which reduces the overall seasonal housing need usually associated with this type of workforce.

The Imperial Valley Housing Authority (IVHA) operates four farmworker housing complexes. Two are located in the City of El Centro, one with 40 units and the other with 36 units. Complexes are also located in the City of Brawley with 58 units and in Heber with 40 units. These farmworker complexes are regulated by the United States Department of Agriculture's (USDA) Rural Development.

Homeless Persons

Homeless individuals and families have an urgent need for housing resources and services; however, their needs are difficult to meet because of the range and complexity of the factors that lead to homelessness. According to the 2020 Point-in-Time Count conducted by the ~~2020 Point-in-Time Count conducted by the Imperial Valley Continuum of Care~~Imperial County Department of Social Services, there were ~~163~~ 1,052 homeless persons in the unincorporated communities of Imperial County. ~~Of these, 42 were sheltered in an emergency shelter and 37 were sheltered in transitional housing, while the remaining 84 were unsheltered.~~ Of these residents, 885 reside in Slab City, a transient community that resides primarily in travel trailers, tents, and other similar structures. The largest homeless population census-designated places in unincorporated Imperial County is located in Salton City, with 62 persons.

Services for homeless families and individuals are available mainly in the incorporated cities in Imperial County. Table A-16 lists homeless assistance programs and service providers in the county.

TABLE A-16
SHELTERS IN IMPERIAL COUNTY

Shelter Name	Type of Shelter	City	Needs Serviced
Center for Family Solutions	Emergency and Transitional	El Centro	Victims of Domestic Violence
Our Lady of Guadalupe Men's Shelter	Transitional	Calexico	Men
House of Hope	Emergency	El Centro	Women and Children
Neighborhood House Casa Villanueva	Emergency	Calexico	Women and Children
Neighborhood House Transitional Housing	Transitional	Calexico	Women and Children
New Creations Transitional Home	Transitional	Imperial	General
Turning Point Men's Home	Transitional	Holtville	Substance Abuse

Source: imperial.networkofcare.org 2021

Housing Characteristics

Unit Type

As of 2019, there were a total of 6,777 housing units in the unincorporated county. Of these, 70.0 percent were detached single-family homes. Mobile homes accounted for 22.6 percent of the housing stock. In Imperial County as a whole, detached single-family homes accounted for 64.5 percent and mobile homes accounted for 10.2 percent of the 57,690 total units. Refer to Table A-17 for information regarding housing units by type in the unincorporated county and in Imperial County as a whole.

The composition of the housing stock varied greatly among townsites in the unincorporated county. In Heber, Salton City, Seeley, and Winterhaven, most housing units were detached single-family dwellings, whereas in Bombay Beach, Desert Shores, Palo Verde, and Salton Sea Beach, most housing units were mobile homes.

TABLE A-17
HOUSING UNIT TYPE

Housing Unit Type	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
Single-Family, Detached	4,742	70.0%	37,202	64.5%
Single-Family, Attached	40	0.6%	1,087	1.9%
2 units	28	0.4%	1,709	3.0%
3-4 units	196	2.9%	3,755	6.5%
5+ units	207	3.1%	7,823	13.6%
Mobile homes	1,533	22.6%	5,908	10.2%
Other (Boat, RV, etc.)	31	0.5%	206	0.4%
Total Housing Units	6,777	100.0%	57,690	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Tenure and Vacancy

Housing tenure refers to the occupancy of a housing unit—whether the unit is owner-occupied or renter-occupied. Housing tenure is influenced by demographic factors such as household composition, income, and age, as well as the cost of housing. According to the 2015-2019 ACS, approximately 68.0 percent of occupied housing units were owner-occupied in unincorporated Imperial County in 2019. This ownership rate is higher than that of the county as a whole, where 38.9 percent of occupied units were owner-occupied. Refer to Table A-18 for occupancy figures for the unincorporated county and for Imperial County as a whole.

Vacancy rates are an indicator of housing supply and demand. If housing demand is greater than the supply, the vacancy rate is likely to be low and the price of housing increases. A 5- to 6-percent vacancy rate is generally considered healthy. According to the 2015-2019 ACS, there was a vacancy rate of approximately 32.0 percent in the unincorporated county and 11.1 percent in the county as a whole. However, 38.4 percent

of the vacant units in the unincorporated county were used for seasonal or recreational use while there is a 1.1 percent vacancy rate for rental units and 1.2 percent vacancy rate for for-sale homes. This suggests that the available supply of housing is well below demand. Refer to Table A-18 for vacancy information for the unincorporated county and for Imperial County as a whole.

TABLE A-18
TENURE AND VACANCY

Tenure and Vacancy Status	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
Occupied Housing Units	4,607	68.0%	44,829	38.9%
Owner-occupied	3,155	46.6%	26,156	22.7%
Renter-occupied	1,452	21.4%	18,673	16.2%
Vacant Housing Units	2,170	32.0%	12,861	11.1%
For rent	74	1.1%	764	0.7%
For sale	78	1.2%	397	0.3%
Rented or sold, not occupied	94	1.4%	342	0.3%
For seasonal, recreational, or occasional use	833	12.3%	2,603	2.3%
For migrant workers	20	0.3%	56	0.0%
Other	1,071	15.8%	8,699	7.5%
Total Housing Units	6,777	100.0%	57,690	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Housing Conditions

Age is one measure of housing stock conditions and a factor for determining the need for rehabilitation. Without proper maintenance, housing units deteriorate over time. Thus, units that are older are more likely to need major repairs (e.g., a new roof or plumbing). As a general rule of thumb, houses 30 years or older are more likely to need rehabilitation. In addition, older houses may not be built to current standards for fire and earthquake safety.

Table A-19 shows that approximately 35 percent of the housing stock in unincorporated areas is relatively new, 20 years old or less. According to the 2015-2019 ACS, approximately 46 percent of the housing stock in unincorporated Imperial County was built before 1990 (30 years or older). Based on this, it is safe to assume that a majority of these units need some type of rehabilitation.

It should also be noted that nearly 23 percent of all housing units in the unincorporated county are mobile homes (see Table A-17). Experience has shown that these structures age much more rapidly than those of

traditional construction; therefore, assumptions regarding housing conditions based solely on age may not be valid for manufactured homes.

According to Imperial County Code Enforcement, at the time of this Housing Element update, there are approximately 153 active condemnation cases and 30 active repair orders. County staff estimates that approximately 10 to 15 condemnation and repair orders, combined, are received per month, and that approximately 10 percent of the County's housing stock is in need of repair or rehabilitation.

TABLE A-19
AGE OF HOUSING STOCK

Development	Unincorporated County		Total County*	
	Number	Percentage	Number	Percentage
2014 or later	20	0.3%	2,755	4.7%
2010 to 2013	10	0.1%	1,489	2.6%
2000 to 2009	2,335	34.6%	10,686	18.3%
1990 to 1999	1,285	19.1%	10,931	18.8%
1980 to 1989	1,167	17.3%	8,365	14.4%
1970 to 1979	650	9.6%	9,741	16.7%
1960 to 1969	697	10.3%	5,065	8.7%
1950 to 1959	373	5.5%	6,068	10.4%
1940 to 1949	109	1.6%	1,750	3.0%
1939 or earlier	95	1.4%	1,435	2.5%
Total	6,741	100.0%	58,285	100.0%

Source: 2015-2019 ACS

**Total County includes both incorporated and unincorporated communities.*

Overcrowding

Overcrowding occurs when there is more than one person per room (excluding bathrooms and kitchens). Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration. Overcrowding most often occurs when housing costs are high relative to income, forcing more than one family to share a single unit or reside in a smaller unit.

According to the ACS, approximately 7.2 percent of households were living in overcrowded conditions in the unincorporated county as of 2019. Among these overcrowded households, approximately 79.0 percent were renters. The occurrence of overcrowding in the unincorporated county is similar to that in the county as a whole, where approximately 10.7 percent of households were living in overcrowded conditions as of 2019. Refer to Table A-20 for data regarding overcrowding in the unincorporated county and in the county as a whole.

TABLE A-20
OVERCROWDED HOUSEHOLDS

Persons per Room	Unincorporated County *		Total County **	
	Number	Percentage	Number	Percentage
Owner-Occupied	3,155	68.5%	26,156	58.3%
1.00 or less	3,085	97.8%	24,433	93.4%
1.01 to 1.50	42	1.3%	1,067	4.1%
1.51 or more	28	0.9%	656	2.5%
Renter-Occupied	1,452	31.5%	18,673	41.7%
1.00 or less	1,189	81.9%	15,621	83.7%
1.01 to 1.50	164	11.3%	2,237	12.0%
1.51 or more	99	6.8%	815	4.4%
Total Occupied Housing Units	4,607	100.0%	44,829	100.0%

Source: 2015-2019 ACS

** Includes only census-designated places in unincorporated Imperial County.*

***Total County includes both incorporated and unincorporated communities.*

Housing Costs and Affordability

Table A-21 lists 2020 affordable rental and home sale prices for Imperial County within HCD-established income categories (Table A-7), based on a four-person household. Extremely low-income households had annual incomes of $26,200 and could afford monthly rents of $655, or to purchase a home priced at approximately $163,536. A very low-income household with an annual income of $34,950 could afford a monthly rent of $874, or to purchase a home priced at approximately $218,152. A low-income four-person household with an annual income of $55,900 could afford a monthly rent of $1,398, or to purchase a home priced at $348,918. A moderate-income household with an annual income of $84,850 could afford a monthly rent of $2,121 or a home purchase price of $529,619.

TABLE A-21
AFFORDABLE HOUSING COSTS BY INCOME CATEGORY

	Income Level (Based on a 4-Person Household)			
	Extremely Low	Very Low	Low	Moderate
Annual Income	$26,200	$34,950	$55,900	$84,850
Monthly Income	$2,183	$2,913	$4,658	$7,071
Maximum Monthly Gross Rent[1]	$655	$874	$1,398	$2,121
Maximum Purchase Price[2]	$163,536	$218,152	$348,918	$529,619

Source: HCD 2020 State Income Limits

1. Affordable cost 30 percent of gross household income spent on housing.

2. Affordable housing sales price is based on conventional 30-year loan at 3-percent interest and a 5% down payment.

Home Prices

Median housing prices in the unincorporated area vary considerably from townsite to townsite. Prices for homes in the areas near the larger incorporated cities are generally higher than are those for the smaller, outlying unincorporated areas. Table A-22 depicts average home listing and sale prices in January 2021 for Census-designated places in unincorporated communities in the County. The median single-family home prices in the unincorporated areas ranged from a low of $45,900 in Salton City to a high of $309,900 in Heber.

TABLE A-22
MEDIAN HOME SALES PRICES, 2021

Community	Median Listing Price
Bombay Beach	-
Desert Shores	$59,000
Heber	$309,900
Niland	$52,000
Ocotillo	-
Palo Verde	$129,000
Salton City	$45,900
Salton Sea Beach	$65,000
Seeley	$105,000
Winterhaven	$140,000

Source: Realtor.com, January 2021

Note: Not enough homes were listed for sale in Bombay Beach or Ocotillo to calculate a median listing price.

Assuming that the potential homebuyer within each income group has sufficient credit, down payment (5 percent), and maintains affordable housing expenses (i.e., spends no more than 30 percent of their income on mortgage, taxes, and insurance), the maximum affordable home prices can be determined. Table A-22 demonstrates the purchasing power of the income groups defined above.

Given the median single-family home price in the unincorporated county, homeownership is beyond the reach of most extremely low-income, and some very low-income, households. Low-income households may be able to afford to buy attached or prefabricated units such as townhomes, condominiums, and manufactured homes.

Manufactured Homes

According to Homes Direct, a provider of new manufactured and modular homes in the western states, including the Imperial County region, new manufactured housing in April 2020, the most recent available data, ranged from $64,500 to $120,300, on average. There would be an additional cost of preparing the land. Most manufactured housing developed in the county serves cost-constrained families, providing an affordable alternative to traditional stick-built development. Table A-21 shows that a four-person, extremely low-income household can afford a maximum sales price of $163,536, a very low-income household can afford a maximum sales price of $218,152, and a low-income household can afford a maximum sales price of $348,918, meaning that manufactured housing is affordable to extremely low- to low-income households.

Rental Housing Costs

The maximum amount a household can spend on rent depends primarily on the level of household income. Table A-21 shows the approximate affordable rent based on income category for 2020. Maximum rent is based on a housing cost of 30 percent or less of monthly income. Maximum rents for households in Imperial County range from $655 per month for extremely low-income households to $2,121 for moderate-income households. The price of rental units in Imperial County varies from area to area depending on the neighborhood, style, and maintenance of the unit. Rental costs were generally found to be higher in the incorporated cities and lower in the outlying rural and desert areas. In February 2021, the County conducted a survey of rental housing websites to identify the median price of rental units by the size of the unit in unincorporated areas of the County. However, only six housing units were available to rent during the survey period, confirming the low-vacancy rate in unincorporated areas. Therefore, the median rents identified through this process may not reflect prices overall. The survey identified that the median monthly rent for a two-bedroom unit in the unincorporated county was $1,011. Based on the income limits shown in Table A-21, this would be affordable to low- and moderate-income households. Refer to Table A-23 for median rental rates in the unincorporated county.

TABLE A-23
MEDIAN MONTHLY RENT, UNINCORPORATED IMPERIAL COUNTY

Unit Size	Median Market Rent
1-bedroom	$375
2-bedroom	$1,778
3-bedroom	$1,011
4-bedroom	$1,350

Source: Zillow.com 2021; Realtor.com 2021; Trulia.com 2021; Craigslist.com 2021

Overpayment

Cost burden is the fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. A household with a cost burden greater than 30 percent of household income is considered to be overpaying for housing. Overpaying households may have to sacrifice other necessities or live in overcrowded conditions.

According to the 2013-2017 CHAS, 9,570 renter households and 6,815 homeowner households were overpaying for housing in the whole of Imperial County (Table A-24); data is not reported for just unincorporated areas of the County.- Among both owner and renter households, overpayment was particularly problematic for lower-income households. The largest number of overpaying renters were those with extremely low incomes (4,525 households). Similarly, 61.5 percent of owner households with extremely low incomes (1,375 households) were paying more than 50 percent of their income for housing. Additionally, 1,370 low-income owner households were overpaying for housing, with 61.3 percent, or 840 households, paying more than 50 percent of their income on housing.

This indicates an existing need for more affordable units across the county. Many of the County's programs are geared toward supporting and assisting in the development of affordable units in the county, particularly the programs listed in Goal 2. Table A-24 describes the extent of overpayment in the county.

TABLE A-24
HOUSING OVERPAYMENT BY INCOME CATEGORY

Percent of Income Spent on Housing	Income Category					Total Households
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
Renters						
<30%	1,075	970	2,070	1,200	4,805	10,120
30%-50%	915	1,940	1,505	245	20	4,625
>50%	3,610	1,225	110	0	0	4,945
Total Overpaying Households	**4,525**	**3,165**	**1,615**	**245**	**20**	**9,570**
Owners						
<30%	580	1,055	2,200	1,595	13,265	18,695
30%-50%	280	530	1,325	485	1,320	3,940
>50%	1,375	840	495	20	145	2,875
Total Overpaying Households	**1,655**	**1,370**	**1,820**	**505**	**1,465**	**6,815**

Source: CHAS 2013-2017

Housing Authority

Residents of Imperial County are served by the Imperial Valley Housing Authority (IVHA). IVHA provides public housing and administers the Section 8 Housing Choice Voucher Program. IVHA owns and manages 943 consistently occupied rental units for lower-income families, seniors, disabled persons, and farmworkers in locations throughout the county.

The Housing Choice Voucher Program provides recipients the opportunity to rent housing of their choice in the private market. The program provides rent subsidies to private landlords on behalf of participant households.

IVHA administers a total of 1,677 vouchers throughout the county. Between 6,000 and 7,000 applicants are on the Public Housing and Housing Choice Voucher waiting lists.

Preservation of Assisted Units at Risk of Conversion

Overview

State Housing Element law requires an analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years (through 2031) due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and development of programs aimed at their preservation. The following must be included in each Housing Element as part of its preservation analysis:

- An inventory of assisted housing units at risk of converting to market rate within 10 years.
- An analysis of the costs of preserving and/or replacing these units.
- Resources that could be used to preserve the at-risk units.
- Program efforts for preservation of at-risk units.
- Quantified objectives for the number of at-risk units to be preserved during the Housing Element planning period.

Use restrictions, as defined by state law, means any federal, state, or local statute, regulation, ordinance, or contract that, as a condition of receipt of any housing assistance (e.g., rental subsidy, mortgage subsidy, mortgage insurance) to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

Assisted Housing Inventory

Most assisted housing is located in the incorporated cities of the county where necessary services are located. However, as shown in Table A-25, eight assisted housing developments provide 367 affordable housing units in unincorporated areas of the county. The County has used a variety of funding sources to

provide affordable housing to residents, including Community Development Block Grant (CDBG), HOME, Tax Credits, Rural Development loans, and other HUD assistance.

Affordable units are considered "at risk" if they are eligible to convert to market rate within 10 years. Table A-25 shows that, while there are no units at risk of expiring by 2031, the loan for Heber Village is eligible to be paid off at any time, thus putting this property at risk of conversion. The County has included Program ~~23~~ 24 to reach out to the owners of Heber Village to express their desire to preserve affordability and complete the appropriate steps if the owners are not interested.

TABLE A-25
ASSISTED HOUSING DEVELOPMENTS IN UNINCORPORATED IMPERIAL COUNTY

Development	Location	Total Units	Affordable Units	Funding Source*	Earliest Date of Conversion
QHA Homes II	Fort Yuma Indian Reservation	38	37	LIHTC	2073
Sierra Vista Apartments	Seeley	48	47	LIHTC	2053
QHA Homes I	Fort Yuma Indian Reservation	44	44	LIHTC	2070
Villa Paloma aka Heber Family Apartments II	Heber	72	71	LIHTC	2061
Heber Family Apartments	Heber	81	80	LIHTC; HUD	2059
Heber Village	Heber	24	24	USDA	2036**
Sunset Garden Apartments	Heber	40	40	USDA	2041
Desert Sunrise Apartments	Heber	24	24	USDA	2034
Total Units		371	367		

Source: California Housing Partnership Corporation 2021

** LIHTC = Low-Income Housing Tax Credit; HUD = United States Department of Housing and Urban Development; USDA = United States Department of Agriculture*

*** The owners can apply to prepay the loan at any time, making this project at high risk of conversion to market rate.*

Resources for Preservation

The types of resources needed for preserving at-risk units fall into three categories: (1) financial resources available to purchase existing units or develop replacement units; (2) entities with the intent and ability to purchase and/or manage at-risk units; and (3) programs to provide replacement funding for potentially lost Housing Choice Voucher Program rent subsidies, otherwise known as the Section 8 program.

A variety of federal and state programs are available for potential acquisition, subsidy, or replacement of at-risk units. Due to both the high costs of developing and preserving housing and limitations on the amounts and uses of funds, a variety of funding sources would be required. Several sources of funding are available to Imperial County for preservation of assisted, multifamily rental housing units to assist with purchasing units or providing rental subsidy, including CDBG or HOME funds. For older buildings with expiring affordability, funding for substantial rehabilitation may also give the County an opportunity to reinstate affordability requirements. HUD may provide Section 8 Tenant Protection Vouchers to subsidize rents for tenants in properties at risk of loss because of expiration due to loss of affordability associated with mortgage pre-payment.

When affordable housing units have the potential to convert to market-rate, due typically to the expiration of an affordable housing agreement or expiration of funding, there is a risk that tenants in those affordable units will be displaced. Certain companies and organizations can be certified as eligible to purchase buildings where a federally assisted mortgage is due to be prepaid. No qualified entities were listed as being interested in purchasing at-risk buildings specifically for Imperial County. The following qualified entities are a portion of those listed as potential purchasers of at-risk units in all counties in California:

- Veritas Urban Properties, LLC
- Catalyst Housing Group, LLC
- JEMCOR Development Partners
- Jonathon Rose Companies
- Preservation Partners Development
- Dawson Holdings, Inc.
- Mesa Realty Advisors
- HCD
- Lincoln Avenue Capitol, LLC
- Eden Housing, Inc.
- GAL Affordable LP
- Highland Property Development, LLC
- American Community Developers, Inc.
- Berkadia
- California Commercial Investment Group
- Colrich Multifamily Investments, LLC

Strategies for Preserving Affordable Housing

Acquisition - For units at risk of conversion, qualified non-profit entities must be offered the opportunity to purchase buildings to maintain affordability.

The factors that must be used to determine the cost of preserving low-income housing include property acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables, such as condition, size, location, existing financing, and availability of financing (governmental and market). Looking

at multifamily buildings throughout the County, prices ranged from $62,500 per unit for a six-unit building in El Centro to $175,000 per unit for a quadplex in Calexico. While all of the units listed for sale in May 2021 were in incorporated jurisdictions of Imperial County, purchasing residential units in unincorporated Imperial County will likely have a similar price range depending on where in the county the units are located. If the property needs significant rehabilitation, or financing is difficult to obtain, it is important to consider these factors in the cost analysis.

In addition to the cost of acquisition, the availability of housing presents another challenge for preserving affordable housing. In May 2021, just five multifamily properties were listed for sale in Imperial County.

Preservation - Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as the Section 8 Housing Choice Voucher program. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair-market rent on the unit. Based on HUD's fair-market rents, the total cost to subsidize rental costs over 20 years for a very low-income household would be $36,720 for a two-bedroom home and $117,840 for a three-bedroom home.

Replacement with New Construction – 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. Looking at a sample project from loopnet.com in May 2021 with 272 assisted units on 17 acres, the cost for land acquisition is approximately $12,000 per unit, or $3,264,000 total. In March 2020, the Terner Center reported that multifamily construction costs average approximately $222 per square foot; therefore, the cost per unit for construction for 800-square-foot units is $177,600 per unit, for a total construction cost of $48,307,000. Based on the total cost of building this development, it can be estimated that the per-unit cost to replace low-income housing would be $189,600.

Cost of Preservation versus Replacement

The cost to the County of preserving units projected to expire in 2031 is estimated to be less in most cases than replacing the units through new construction. Replacing the units with rehabilitated units may be cost-effective in some instances. Actual costs involved in each option will depend on the rental and real estate market situations at the time the affordability restrictions on these projects expire.

Extending low-income use restrictions to preserve the units as affordable may require financial incentives to the project owners. Other scenarios for preservation would involve purchase of the affordable units by a nonprofit or public agency, or local subsidies to offset the difference between affordable and market rents. Scenarios for preservation depend on the type of project at risk.

Assessment of Fair Housing

Assembly Bill (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, affirmatively further fair housing 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."

AB 686 requires the County, and all jurisdictions in the state, to complete three major requirements as part of the Housing Element update:

1. Conduct an AFH that includes a summary of fair housing issues; an analysis of available federal, state, and local data knowledge to identify patterns of segregation or other barriers to fair housing; and prioritization of contributing factors to fair housing issues.
2. Prepare the Housing Element Land Inventory and identification of sites through the lens of AFFH.
3. Include a program in the Housing Element that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes and addresses contributing factors identified in the AFH (applies to Housing Elements beginning January 1, 2019).

In order to comply with AB 686, the County has completed the following outreach and analysis.

Outreach

As discussed in the "Public Participation" section of the Housing Element in Chapter 1, Introduction, the County held two virtual community workshops, three individual stakeholder consultations, and conducted a brief survey that was paired with a video overview of the Housing Element update for residents and stakeholders to review and respond to. The County offered the presentations at community workshops and flyers in both English and Spanish.

The two community workshops were held online in April 2021 and offered presentations in both English and Spanish. Prior to holding these workshops, the County reached out to several community organizations in an attempt to identify in-person meetings to attend to improve access to the presentation for residents. However, the organizations noted that meetings were not being held regularly and would not align with the Housing Element update schedule; therefore, the County elected to hold the workshops online and provide a video overview that is available on the County's website on-demand for all residents. At the community workshops, two public comments were received: one was about a potential student housing site to be located outside the City of Brawley, and the other expressed concern regarding the conversion of family units for farm labor (H2A) housing. The County expressed interest in discussing the student

housing further with the organization and confirmed that units are not being lost to conversion to H2A housing. No public comments or feedback was received related to fair housing. Recordings of the presentation are available on the County's website.

In January and February 2021, the County reached out to 10 community organizations, fair housing advocates, service providers, and other stakeholder groups to solicit one-on-one feedback regarding housing needs in the county. Of these 10 organizations, 3 participated in an individual consultation. The primary fair housing concerns identified by these stakeholders were:

- ~~a sh~~A severe shortage of affordable housing;
- ~~, a d~~Demand for rental assistance that exceeds what is available; ~~,~~ and
- ~~i~~Insufficient or inadequate transitional housing for homeless individuals and families.

~~-~~All three stakeholders emphasized a need for housing for homeless and low-income residents throughout the county. The collection process for this qualitative data is described in greater detail in the Public Participation section of this Housing Element and the feedback informed this assessment of fair housing and associated programs identified in Table A-26A.

Assessment of Fair Housing Issues

California Government Code Section 65583 (10)(A)(ii) requires Imperial County to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Since 2017, the California Tax Allocation Committee (TCAC) and HCD have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators in an effort to provide evidence-based research for policy recommendations. This effort has been dubbed "opportunity mapping" and is available to all jurisdictions to assess access to opportunities within their community. Imperial County is unique in that most residents live along the highway corridor in the center of the county in communities that are located north to south from the Salton Sea to the California-Mexico border. Ocotillo, Palo Verde, and Winterhaven are the only communities located outside of this central area.

As shown in Figure B-1, TCAC/HCD Opportunity Areas, the 2021 TCAC/HCD Opportunity Areas designated the area surrounding the Salton Sea and adjacent to the California-Mexico border as low-resource. The communities of Desert Shores, Salton Sea Beach, Bombay Beach, Salton City, and Niland are in low-resource areas, Heber is in a moderate resource area, Seeley is in a high-resource area, and Winterhaven is in a highest resource area. There is insufficient data to identify the resource categorization of the communities of Ocotillo or Palo Verde. There are no areas identified as high segregation and poverty in Imperial County. The distribution of resource areas reflects where the greatest concentrations of residents are located in the county.

Some of the indicators identified by TCAC and HCD to determine the access to opportunities include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. These indicator scores decrease as the level of designation decreases from higher- to lower-resourced areas. Low-resource areas typically have limited access to education and employment opportunities and may have poor environmental quality. Areas of high segregation and poverty are those that have an overrepresentation of people of color compared to the County as a whole, and at least 30 percent of the population in these areas is below the federal poverty line ($26,200 annually for a family of four in 2020).

It is important to note that a highest resource area can still have high concentrations of poverty, as is the case in Winterhaven. Resource areas designations are based on a variety of factors, as described above. While Winterhaven has high concentrations of poverty, it also has the best access to proficient educational opportunities in unincorporated Imperial County, is in close proximity to medical centers and hospitals, grocery stores, and large commercial and retail centers that provide employment opportunities. There are also a variety of transit opportunities for residents of Winterhaven, as described in the Access to Opportunity section. Given the context of Winterhaven, it is worth noting that even areas of high opportunity can still have fair housing issues and are included in this assessment.

Patterns of Integration and Segregation

Race and Ethnicity

As shown in Figure B-2, Predominant Population - Hispanic Majority, the majority of residents west of the East Highline Canal in Imperial County identify as Hispanic or Latino, with the predominant Hispanic majority surrounding, and south of, the City of El Centro (including Heber) and north of the City of Westmorland (including Niland). Heber has the highest percentage of residents that identify as Hispanic or Latino among the unincorporated communities of Imperial County, reflecting ethnic trends in incorporated jurisdictions in the county. In the southeastern corner of the county, where the community of Winterhaven is located, there is a slim (less than 10 percent) number of residents who identify as Native American. East of the East Highline Canal, with the exception of Winterhaven and the adjacent Fort Yuma Indian Reservation, is predominantly White. While the dominance of non-White, Hispanic residents is more common in SCAG jurisdictions than in many areas of the state, Imperial County has one of the largest areas in the SCAG region where the population predominantly identifies as Hispanic or Latino. Given the county's shared border with Mexico and trends of migrant and day workers crossing the border, this demographic makeup has dominated Imperial County since its inception.

As a result of the range in demographic identities throughout the county, Imperial County scores a diversity index score of over 70 in much of the county, with 100 being perfect diversity, and only the area between El Centro, Holtville, and Calexico, excluding Heber, having a lower diversity index score (Figure B-3, Diversity Index 2018). The northeast border of the Salton Sea just south of the Imperial County boundary has been identified as having a significantly lower diversity index score than the rest of the county; however, this area is largely unpopulated and likely does not reflect the area accurately. The high level of diversity in Imperial County has remained relatively constant in recent years, which the only notable change being an increase

in diversity in the eastern half of the county. The diversity index scores in unincorporated Imperial County reflect the more rural areas of the SCAG region as a whole, such as eastern Riverside County and eastern San Bernardino County. Imperial County tends to have a higher rate of diversity in both its incorporated and unincorporated communities than urbanized areas of SCAG jurisdictions.

Income

In addition to racial and ethnic variation between the eastern and western portions of the county, Imperial County residents report a higher median income in and around incorporated jurisdictions and the western half of the county, as seen in Figure B-4, Median Income (2015-2019). While there is a lower percentage of the population that falls into the low- or moderate-income category in eastern Imperial County (Figure B-5), this is likely due to the size of the population rather than a higher median income overall. In contrast, there is a lower median income near all shores of the Salton Sea, where several unincorporated communities are located. There has been an increase in the areas that report a higher median income, more reflective of areas outside of Imperial County, since 2014, when only the areas between, and including, the cities of El Centro and Brawley had a median income significantly above the poverty line. However, poverty is still a dominant issue in Imperial County. More than 20 percent of residents in all unincorporated communities, had an income below the poverty line in 2019, according to ACS. This was even higher in Winterhaven and the area west of the City of Calipatria, where more than 40 percent of residents had an income below the poverty line. While SCAG jurisdictions, like most jurisdictions in the state, do have some areas of concentrated poverty, Imperial County has a lower median income and higher rates of concentrated poverty than most of the region. As discussed previously in this chapter, a majority of residents of the unincorporated county are lower income, indicating that while segregation based on income in unincorporated Imperial County may not be an issue, access to affordable housing is a fair housing issue in the county. To combat this, the County has included Program ~~12~~ 13 to provide incentives for affordable housing and Program ~~4~~ 5 to work with the Imperial Valley Housing Authority to acquire and rehabilitate affordable multifamily units.

As shown in Figure B-4, Median Income (2015-2019), the median income in western communities and jurisdictions throughout the SCAG region is higher than in eastern portions of the region. The range in median incomes in highly urbanized counties, such as Los Angeles, Orange, and Ventura, is significant, with block groups with extremely high median incomes in coastal communities, while there are more block groups with median incomes less than the state median in more inland communities. Eastern Riverside County and San Bernardino County reflect the income patterns found in Imperial County, with higher rates of poverty in rural and agricultural communities. The stark contrast between eastern and western SCAG communities and jurisdictions has persisted throughout the history of this year and is tied to patterns of development and the dominant industries. Rural areas in the region have extensive desert and have not typically been conducive to dense urban development and, instead, have smaller communities with lower median incomes due to proximity to jobs and economic opportunities. Imperial County is reflective of the eastern SCAG trends.

Racially and Ethnically Concentrated Areas of Poverty

While there are no racially and ethnically concentrated areas of poverty (R/ECAPs) in unincorporated Imperial County, there are two in incorporated jurisdictions, one in the City of El Centro and one in the City of Calexico. R/ECAPs, as defined by HUD, are areas in which 50 percent or more of the population identifies as non-White and 40 percent or more of individuals are living below the poverty line. While there are no HUD-designated R/ECAPs in unincorporated communities, the areas immediately north of the Imperial County boundary along the shores of the Salton Sea in Riverside County are considered a R/ECAP. While planning for these is not within the jurisdiction of Imperial County, the County has accounted for the presence of these in the analysis of nearby unincorporated communities (Desert Shores and Salton Sea Beach), while reviewing patterns of segregation, access to opportunity, and housing need.

Racially Concentrated Areas of Affluence

Similarly, to R/ECAPs, there are no areas that meet the definition of a racially concentrated area of affluence (RCAA) in unincorporated Imperial County. A RCAA was defined in 2019 in the HUD's Cityscape periodical by Goetz et al. in *Racially Concentrated Areas of Affluence: A Preliminary Investigation* as a census tract in which 80 percent or more of the population is White and has a median income greater than $125,000 annually. Using this definition, there are no census tracts in Imperial County that can be identified as a RCAA. In the SCAG region, RCAAs are located primarily in coastal communities and jurisdictions, with none in Imperial, Riverside, or San Bernardino counties. All census tracts in unincorporated Imperial County have a median income equal to or less than the State median income of $87,100, indicating that there are no areas of concentrated affluence.

Familial Status

In most of the populated areas of the county, west of the East Highline Canal, approximately 40 to 50 percent of households were populated by married-couple families with children. However, in the areas surrounding the City of Westmorland, there is a higher rate of single-parent, female-headed households with children than all other areas of unincorporated Imperial County. Adults living with a spouse make up a larger share of the population in unincorporated areas adjacent to incorporated cities than in more remote areas, such as in Salton City and neighboring communities. However, while there is a slight increase near incorporated areas, there are no areas with a significant concentration, or lack of, this group. Married couple households with children are much more prevalent in Imperial County than single-parent or couples without children. While this population makes up the largest share of the family types, they are a higher percentage of the population in Seeley and surrounding the cities of Brawley and Holtville than anywhere else in the county.

Familial trends mirror the SCAG region closely, with higher rates of families with children located near incorporated jurisdictions and more single-adult households in rural areas. The County will promote the CalWorks program to all residents, with a focus on the areas with a higher rate of female-headed households, to ensure all residents, regardless of familial status, have access to housing and services (Program ~~20~~21).

Persons with Disabilities

According to the 2015-2019 ACS (Figure B-7), the communities of Bombay Beach, Ocotillo, Salton City, Winterhaven, Desert Shores, and Salton Sea Beach each have a percent of the population that identifies as having a disability that is greater than the percentage of unincorporated Imperial County as a whole (15.1 percent). However, of these communities, Bombay Beach and Salton Sea Beach have experienced a significant decline in the percentage of the population with a disability since 2014. The communities with the lowest percentage of the population with a disability are those closest to incorporated jurisdictions, including Heber, Niland, and Seeley. Some jurisdictions, such as Palo Verde, has a large senior population, which tend to have higher chances of disability.

Across the SCAG region, the percentage of the population with a disability is lower in and near incorporated jurisdictions or more urbanized communities, as is found in Imperial County. This may be due to the larger populations in these areas, increasing the number of residents without a disability, or increased number of young persons living near urban centers, which is a population that typically has ~~tend to have~~ fewer disabilities than seniors. The areas with higher rates of persons with disabilities, the areas further from incorporated and urban centers, tend to be those areas with heavy industries such as agriculture, mining, and other industries that have higher injury rates than a standard office job might. This may contribute to the trend seen throughout the SCAG region with higher rates of disabilities in more rural, and typically less affluent, areas. This trend has remained steady in the last decade, with few shifts in concentrations of persons with disabilities.

Overall, Imperial County reflects the disability trend seen across the SCAG region, which has higher rates of disability in rural, unincorporated areas, particularly where agriculture is the dominant industry, and lower rates near incorporated cities such as El Centro.

Access to Opportunity

Employment Opportunities

While there is limited housing in eastern Imperial County due to the geography, ~~there are many jobs in this area~~HUD estimates that this area is among those with the closest proximity to jobs in the County. According to HUD's 2017 analysis of proximity to jobs, nearly the whole eastern half of Imperial County is considered close to jobs (Figure B-~~58, Job Proximity Index [2014-2017]~~). While the employment opportunities may not be geographically close in eastern Imperial County, they employ a large number of people and are therefore weighted more heavily by HUD. While the map indicates that jobs are concentrated in the eastern half of the county, an analysis of commute types found that the job access varies significantly and is difficult to measure for much of the unincorporated county. The mean commute time to jobs in the county in 2019, according to ACS, was 22.1 minutes. Niland, Salton Sea Beach, and Seeley, all had shorter mean commute times than this (19.1, 10.8, and 17.9 minutes, respectively). Mean commute times were not available for Bombay Beach, Desert Shores, Ocotillo, Palo Verde, or Winterhaven. Due to the high percentage of residents in these communities who are seniors that may ~~no longer work~~be retired, there is less need for jobs in some of these areas. To assist residents of the county who are seeking work to access job

opportunities and improve their economic mobility, the County will promote the CalWorks program to provide assistance for eligible low-income families with children to meet basic needs and enter or re-enter the workforce (Program ~~20~~21). The County will also use the meetings with transit agencies to identify any unmet transit demand for access to employment centers (Program ~~20~~21).

When compared to the SCAG region, Imperial County residents have the shortest mean commute time to work, according to ACS. The mean commute time in Imperial County is 22.1 minutes, with the next shortest being 27.8 minutes for Ventura County. The counties of Orange, Riverside, and San Bernardino all have mean commute times of over 30 minutes. This suggests that access to employment opportunities is better for Imperial County residents, from a perspective of physical proximity, than for all other counties in the SCAG region. In contrast to the trends found in Imperial County, there is a higher concentration of employment opportunities in urban communities of the SCAG region than rural areas. While distribution of jobs differs between Imperial County and other SCAG jurisdictions, primarily due to development of larger urban areas, Imperial County residents have closer access to employment opportunities.

Educational Opportunities

According to the 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, only six schools in unincorporated Imperial County were ranked. These were located in Winterhaven (three ranked schools), Niland (one ranked school), Heber (one ranked school), and Seeley (one ranked school). Of these, only the schools in Heber and Niland ranked above the 50th percentile compared to other schools in the state. This ranking, however, is not comprehensive. In addition to these schools, there is one additional school in Winterhaven, six in Heber, and two in Salton City. Bombay Beach, Desert Shores, Ocotillo, Palo Verde, and Salton Sea Beach do not have a school at any level. While the ACS reports that there are no residents under age 18 in Bombay Beach and Palo Verde~~, according to ACS~~, Desert Shores, Ocotillo, and Salton Sea Beach do have small youth populations that need school facilities. While it is likely that there are children in both Bombay Beach and Palo Verde, there may not be enough to support a full school. The concentration of schools in communities further from the Salton Sea indicates disproportionate access to education across unincorporated Imperial County. This is further supported by Figure B-~~6~~9, TCAC/HCD Educational Score, which depicts that the most positive educational outcomes are anticipated in communities near incorporated jurisdictions and in Winterhaven. While Imperial County differs from the rest of the SCAG region in many ways, lack of access to schools in rural and unincorporated communities reflects the trends seen in San Bernardino and Riverside Counties. For example, in San Bernardino and Riverside Counties and many urban areas in other counties with low median incomes, have low expected educational outcomes in eastern portions of these counties and areas with higher median incomes, similar to Imperial County. Throughout the SCAG region, higher educational outcomes are often expected in areas with higher median incomes, though not exclusively. To improve access to educational opportunities for residents of Imperial County, particularly in areas with low median income and access to resources, the County has included Program ~~20~~ 21 to coordinate with Imperial County Transportation Commission to ensure that bussing is available for all residents to access schools.

Mobility

Imperial County residents are served by Imperial Valley Transit (IVT), operated by First Transit, Inc., and Yuma County Area Transit (Winterhaven). IVT offers fixed routes, deviated fixed routes, and remote zones routes. The fixed and deviated fixed routes operate primarily between the incorporated jurisdictions, Seeley, Niland, and Heber. Deviated fixed routes allow passengers to request service one day in advance for the communities of Seeley, Ocotillo, and the east side of the Salton Sea. The remote zone route operates once a week from Brawley to Niland and Bombay Beach, and back. There is no transit offered to the communities on the western shore of the Salton Sea, including Salton City, Salton Sea Beach, and Desert Shores. All Transit is a data tool that measures access to transit, connectivity, and service availability. According to All Transit, the Imperial County has a transit performance score of 0.1 compared to 5.5 for the SCAG region as a whole. As with other services and opportunities identified in this assessment, public transit is more readily available in the urban centers of the western SCAG region with several transit providers including Riverside Transit Agency, Los Angeles Metro, Orange County Transportation Authority, among others. Similar to Imperial County, eastern Riverside County and San Bernardino County have low transit scores due to limited transit routes and frequency. -To better meet the needs of residents, the Imperial County Transportation Commission conducted an unmet Transit Needs Survey between March and April 2021. The County will work with the Transportation Commission to review unmet needs and assist with applying for funding to expand routes to improve mobility for residents, as necessary (Program ~~20~~21). Residents of Winterhaven are served by Yuma County Area Transit, which provides connections to El Centro and Yuma, Arizona. Service to El Centro is offered four days per week, twice per day.

Access to Disability Services

To meet the needs of residents with disabilities, First Transit, Inc. operates IVT MedTrans, a non-emergency transit service offered between Imperial Valley and San Diego County to connect residents with medical facilities and doctors' offices. Additionally, First Transit, Inc. also operates IVT Access, an advanced reservation curb-to-curb transportation service. IVT Access includes vehicles with wheelchair lifts and is intended to serve individuals with physical or cognitive disabilities that are unable to use the standard routes offered by IVT.

Environmental Health

In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. A community with a high score, is one with higher levels of pollution and other negative environmental indicators. As shown in Figure B-~~7~~10, Imperial County has high pollution levels throughout much of the County, with the exception of Winterhaven and the tract east of the Niland. The areas with the poorest environmental health are those surrounding urban centers, such as the cities of El Centro, Brawley, and Westmorland, likely due to increased traffic emissions and industrial uses. Environmental conditions in Imperial County are similar to dense, urban cores in the SCAG region (e.g. cities of Riverside, Los Angeles, Pomona, etc.), where traffic and other factors decrease the level of environmental health. The SCAG region is unique in that it has dense urban areas and expanses of desert

and agricultural lands. In each type of geography, there are different causes of poor environmental conditions ranging from vehicular congestion to heavy equipment. However, as seen in Figure B-10, much of coastal Southern California has positive environmental conditions. An environmental justice analysis conducted by SCAG in 2019 found that, throughout the region, the areas with the poorest environmental conditions typically coincided with concentrations of low-income populations. This reflects the findings in Imperial County where there is a significant low-income population and poor environmental conditions.

The Imperial Valley Environmental Justice Taskforce comprises of residents, environmental enforcement officers, and community leaders in Imperial County. The members of the taskforce, which does not include County staff, meet monthly to discuss environmental monitoring and identify areas of concern. The County will meet with the Taskforce to identify steps the County can take to improve environmental conditions for residents (Program ~~20~~21). Additionally, concurrently with the Housing Element update, the County is updating the Environmental Justice Element of the General Plan to identify communities that are disproportionately affected by pollution and other hazards that contribute to negative health effects, exposure, and environmental degradation to inform policies and programs to be included in the Environmental Justice Element.

~~Other Relevant Factors~~

~~The geographic conditions in Imperial County postponed the start of development until after 1901, when the Imperial Canal was first opened to bring water from the Colorado River to the Imperial Valley. Bordered by desert and mountains, much of the county is not conducive to habitation and for much of Imperial County's history, population growth has been tied to water supply and agricultural success. With the introduction of the Imperial Canal provided water for irrigation, which spurred an agricultural economy that brought farmers to the valley, and ultimately resulted in transportation connections to San Diego and railway lines that previously hadn't existed. This change further connected Imperial County to surrounding areas, stimulating growth. However, large-scale flooding and degrading soil quality stalled development in the early 1900s in Imperial County. It wasn't until 1940 when the All-American Canal brought a stable water supply, and power, back to the County did farming and other local economies growth once again. The history of Imperial County has been tied closely to the terrain and limitations it presented and most development did not begin in the county until after national segregation trends such as redlining. There is no history of redlining in Imperial County, a practice in which federal home mortgage loans were systematically denied to minority households, and the industry in Imperial County draws workers from neighboring communities in Mexico, just across the border. As a result, while Imperial County has a higher poverty rate and lower median income than surrounding jurisdictions, many patterns identified in this assessment of fair housing are not related to county policies such as exclusionary zoning or racial covenants. The primary driver of segregation in Imperial County is access to economic opportunity and healthy neighborhoods, as described throughout this assessment.~~

Disproportionate Need and Displacement Risk

Overcrowding and Overpayment

As discussed previously in this chapter under the "Housing Characteristics" section, overcrowding is a more significant problem among renters in unincorporated Imperial County than owners. While 7.2 percent of all households in the unincorporated county are overcrowded, 18.1 percent of renters are overcrowded, while approximately 2.2 percent of owners are living in overcrowded situations. As seen in Figure B-11, t~~T~~he highest rate of overcrowding among renters is present in the communities of Heber (32.4 percent) and Salton City (23.3 percent), and the highest rate of overcrowding among renters is in Desert Shores (10.2 percent). Overcrowding is also present, at a lesser rate, in Bombay Beach, Niland, and Seeley; no overcrowding is reported in Ocotillo, Palo Verde, or Salton Sea Beach. The trends of overcrowding in Imperial County reflect the region, with higher concentrations of overcrowding in areas with higher poverty. Overcrowding is more prevalent in most urban and suburban centers in SCAG than in rural areas, with most of these in western SCAG. This includes cities of Los Angeles, Santa Ana, Anaheim, Ontario, Riverside, Perris, San Bernardino, Oxnard, and more. In these areas, more than 20% of residents in much of these cities are living in overcrowded situations. Overcrowding in these areas is much more significant than anywhere in Imperial County, even considering the increased rates in Heber and Salton City. The higher rate of overcrowding typically means that either appropriately sized housing is unaffordable to current residents, or that the type of housing available does not meet the community's need. In either case, overcrowding means there is a disproportionate need for affordable, larger housing units in these areas. The County will meet with the developers to identify barriers to constructing larger housing (Program ~~12~~13) and has included several other programs to incentivize development of affordable housing.

In addition to overcrowding, overpayment is also a significant issue in Imperial County. As shown in Figure B-~~8~~12, Overpayment by Renters (2015-2019), renter households overpaying for housing is a chronic issue across the developed areas of Imperial County and the region. Approximately 48 percent of all renter households in Imperial County are overpaying for housing, with 52 percent of those severely overpaying. Additionally, approximately 36 percent of owners are overpaying for housing, with 42 percent of those severely overpaying. This issue has been present in recent years, though the areas with the greatest rate of overpayment have shifted along with the increase in poverty, as shown in Figures B-~~8~~ 12 through B-~~11~~15. Renters overpaying for housing have concentrated in the center of the county, as shown in Figure B-~~8~~12, while owners overpaying have shifted from the western to the eastern areas of the county (Figure B-~~10~~14, Overpayment by Homeowners [2015-2019]). The shift in concentration of overpayment reflects changes in poverty distribution in Imperial County. Overpayment among owners has decreased slightly throughout the SCAG region, similar to Imperial County. Overpayment is pervasive throughout the region, though the highest rates of overcrowding occur in the City of Los Angeles and surrounding areas. In other areas of SCAG, overpayment among homeowners is similarly high and presents a barrier to stable housing for all of these households. Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs. To address displacement risks due to overpayment, the County will provide incentives to encourage affordable development and will develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities within the county (Program ~~20~~21).

The shortage of housing in Imperial County may further both overcrowding and overpayment as residents may have to "double up" due to lack of housing options or to be able to afford the housing that is available. In 2019, the vacancy rate for rental units was 1.1 percent and 1.2 percent for ownership units. These vacancy rates are typically considered low as they do not provide enough availability for residents to easily relocate due to any circumstances that may arise, such as a change in job, income, or growing family. The County has included Program ~~12~~ 13 to incentivize development to increase the supply and enable mobility for residents with a disproportionate risk for displacement in Imperial County.

~~Housing Condition~~Substandard Housing

Housing condition presents another issue in Imperial County that may increase displacement risk for residents. Approximately 56 percent of housing in the unincorporated areas of the county are older than 30 years, which is typically the age at which housing units begin to need repairs or rehabilitation to meet current standards or fix features that have begun to degrade. Additionally, 23 percent of the housing stock in Imperial County is manufactured homes, which often need more frequent maintenance to remain in good condition or may be unpermitted and in substandard condition (see "Housing Stock Conditions" of the Community Profile). California Rural Legal Assistance and other stakeholders also emphasized the poor conditions of housing for farm workers. Given the state of existing housing, especially for lower-income households, the County will promote available rehabilitation programs to assist homeowners with rehabilitation or repair and, when funding permits, will provide relocation assistance for tenants who are temporarily or permanently displaced as a result of rehabilitation efforts (Programs ~~10~~ 11 and ~~21~~22).

Compared to other counties in the SCAG region, the unincorporated areas of Imperial County have a newer housing stock, which would typically indicate better housing stock. For example, in Ventura County 76.7 percent of the housing stock is older than 30 years, 75.3 percent of the housing stock in Orange County, and 69.3 percent in San Bernardino County. However, similarly to Riverside County, there is a significantly higher percentage of the housing stock that is manufactured homes that, while potentially newer, need maintenance more frequently. Additionally, the median income is significantly higher in other jurisdictions of the region when compared to Imperial County. Therefore, it is likely that residents in other areas of the SCAG region have a greater ability to afford regular maintenance on their homes and may maintain their condition overtime. Given the composition and age of the housing stock in Imperial County paired with a low median income, it is likely that housing conditions are less deteriorated in other areas of the region. Due to limited staff capacity, a housing condition survey has not been conducted recently. However, it is expected that substandard housing, while present throughout the unincorporated county, is a more significant issue in communities with higher rates of poverty, such as Niland, Salton City, and Desert Shores. To more fully understand the rehabilitation needs in Imperial County, with an emphasis on mobile home parks, the County will explore conducting a housing conditions survey as feasible (Program ~~20~~21).

Homelessness

As discussed in the Special Needs Group section of the Housing Needs Assessment, there are approximately 1,052 homeless persons living in unincorporated areas of Imperial County, according to the Imperial County Department of Social Services. Persons experiencing homelessness, or at risk of becoming homeless, are

typically extremely low-income and are displaced from housing due to inability to pay or other issues. However, of this large homeless population, 885 reside in Slab City, a community in the Sonoran Desert made up of transient residents striving to live "off-the-grid." Therefore, while this population meets the definition of homeless, they are not seeking homeless services or support to secure stable housing. While there are several shelters and homeless resources in Imperial County available to those homeless residents in need (Table A-16), there are limited services available outside of incorporated jurisdictions. In order to facilitate the construction of emergency shelters, the County has included Program 15 to allow low-barrier navigation centers in all zones that allow mixed-use and non-residential zones that allow multifamily uses. The County also encourages development of housing for extremely low-income housing through outreach to developers, financial and technical assistance, expedited processing, and other incentives identified in Program ~~17~~18.

Displacement Risk

The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the County may also indicates an increased risk of displacement due to housing costs outpacing wage increase, a trend that is felt throughout the region, state, and nation. According to Zillow, the average home value in Imperial County has increased 16.6 percent annually since 2012. While housing costs have increased rapidly, wages have not kept pace. The average income in Imperial County has increased approximately 2 percent annually, from $54,947 in 2010 to $64,355 in 2019 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in Imperial County despite the low cost of housing itself compared to the region, state, and nation, and may prevent low-income households from remaining in their homes over time. In order to address affordability challenges, the County will encourage and incentivize development of affordable housing units, particularly in high opportunity areas and will develop a program to connect lower-income residents with affordable housing opportunities (see Table A-26A).

Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, and when the household is overcrowded. Each of these presents barriers to stable housing for the occupants. In Imperial County, overpayment is pervasive and is not necessarily linked to areas with a lower median income. However, as discussed under Patterns of Integration and Segregation, there are higher rates of poverty near Niland and surrounding the Salton Sea. As shown in Figures B-12 through B-15, the rate of overpayment is slightly higher in these areas of the county as well. The County has included Programs 45, ~~13~~14, and ~~23~~24 to increase the supply of affordable housing by providing assistance with acquisition, rehabilitation, and construction; providing technical assistance, streamlining, and other incentives; and working with affordable housing providers to preserve units.

Other Relevant Factors

~~***Local Knowledge and Other Relevant Factors***~~

~~**Local Knowledge**~~

Housing and Demographic Trends

~~Housing Unit Types:~~

~~Tenure Trends:~~

~~Vacancy Rates:~~

Since 2010, according to the American Community Survey, the number of occupied housing units has decreased in almost all unincorporated communities in Imperial County, with the exception of Desert Shores, Salton City, and Seeley. While there was only a 1 percent increase in total occupied housing units in Seeley from 2010 to 2019, the increase was largely among ownership units, with a 13 percent increase in owners and a 10 percent decrease in renters. Salton City also saw a larger increase in in owner occupants than renters, though on a much larger scale. Overall, there was a 289 percent increase in occupied housing units in Salton City, with a 330 percent increase in owners and 205 percent increase in renters. This suggests significant growth concentrated in Salton City and supports feedback from County staff that there has been a rapid increase in inquiries regarding development in this community in recent years. In contrast to Salton City and Seeley, Desert Shores has seen a significant increase in the number of renters, rather than owners (154 percent increase in renters compared to 20 percent increase in owners). The growth of the renter population in Desert Shores is likely a result of a significant increase in the number of mobile homes, with a 141 percent increase in the supply of mobile homes in this community since 2010.

All unincorporated communities saw a decrease in the number of mobile homes since 2010 except for Desert Shores, which may support a migration of occupants of these units from other communities to Desert Shores. In contrast, Bombay Beach, Salton City, Seeley, and Winterhaven have experienced an increase in the number of single-family, detached units. There was an overall decrease in the number of units, of all types, in the communities of Heber, Niland, Ocotillo, Palo Verde, and Salton Sea Beach since 2010. Many households in these communities may have left for other communities seeing growth, though data does not track individual households across time.

The dramatic increase in the number of occupied rental units in Bombay Beach likely entered an existing, underutilized housing stock. In 2010, there was a rental vacancy of approximately 85 percent, that dropped to zero percent by 2019 according to American Community Survey estimates. The existing housing stock in Bombay Beach presented a mobility opportunity for residents that may have encountered challenges in securing rental housing in other communities where rental vacancy rates have remained low since 2010, such as Heber, Salton City, and Salton Sea Beach. However, limited access to resources in Bombay Beach limits access to opportunities for these residents.

The shift in unit types, tenures, and vacancy suggest growth occurring in communities surrounding the Salton Sea, despite greater access to jobs and other opportunities near incorporated jurisdictions. However, the interest from developers reported to the County to meet the demands for housing in Salton Sea communities may support future opportunities directly in these neighborhoods. In order to address historic disinvestment that has left many parts of these communities without basic infrastructure, the County will conduct infrastructure needs in each colonias and meet with residents to prioritize investment and create safe and healthy living environments for current and future residents (Program 4). These efforts will be conducted in all colonias in Imperial County with the intent of improving infrastructure both to support growth, such as what is occurring in the Salton Sea area and preserve existing housing to reduce displacement risk in all communities.

History of Development and Investment

The geographic conditions in Imperial County postponed the start of development until after 1901, when the Imperial Canal was first opened to bring water from the Colorado River to the Imperial Valley. Bordered by desert and mountains, much of the county is not conducive to habitation and for much of Imperial County's history, population growth has been tied to water supply and agricultural success. The introduction of the Imperial Canal provided water for irrigation, which spurred an agricultural economy that brought farmers to the valley, and ultimately resulted in transportation connections to San Diego and railway lines that previously hadn't existed. This change further connected Imperial County to surrounding areas, stimulating growth. However, large-scale flooding and degrading soil quality stalled development in the early 1900s in Imperial County. It wasn't until 1940 when the All American Canal brought a stable water supply, and power, back to the County did farming and other local economies growth once again. The history of Imperial County has been tied closely to the terrain and limitations it presented and most development did not begin in the county until after national segregation trends such as redlining. There is no history of redlining in Imperial County, a practice in which federal home mortgage loans were systematically denied to minority households, and the industry in Imperial County draws workers from neighboring communities in Mexico, just across the border. As a result, while Imperial County has a higher poverty rate and lower median income than surrounding jurisdictions, many patterns identified in this assessment of fair housing are not related to county policies such as exclusionary zoning or racial covenants. The primary driver of segregation in Imperial County is access to economic opportunity and healthy neighborhoods, as described throughout this assessment.

In Unincorporated Imperial County, historical investment has been allocated based on need. However, while there has not been disproportionate allocation of investments, there has been a shortage overall in all unincorporated communities. Most communities are in need of basic infrastructure additions or improvements such as street lighting, sidewalks, gutters, and curbs. Due to a shortage of funding and staff capacity, there has been historic challenges to invest in all communities. County staff report that there are nine communities in the unincorporated areas that are considered colonias. A colonia is a community located within 150 miles of the United States-Mexico border that lacks basic infrastructure such as potable water, adequate sewer systems, and a shortage of safe and sanitary housing. The unincorporated colonias include Palo Verde, Niland, Heber, Ocotillo, Bombay Beach, Salton Sea, Poe, Seeley, and Winterhaven.

While the infrastructure concerns and concentrations of poverty have been historically acknowledged, previous Colonias Master Plan updates lacked targeted policies and programs to make meaningful change, according to the Imperial County Workforce and Economic Development Department (ICWED). However, since 2014 ICWED has contracted with Republic Services (Allied Waste) to conduct regular neighborhood cleanups in all unincorporated communities and has aggressively pursued funding to improve water and sewer infrastructure, provide housing rehabilitation assistance, and other improvements for public health and safety. The neighborhood cleanup program has resulted in the removal of 5,609,140 pounds of waste from all communities combined, including the removal of household hazardous waste. CDBG funding has been used to complete a Winterhaven public safety facility, Poe Colonia water and sewer improvements, Palo Verde water well improvements, and Seeley waterline improvements. Current CDBG projects include a Winterhaven water treatment plant, Niland public safety facility, housing rehabilitation in Salton Sea and Heber, and a Seeley fire station. In addition to these recent efforts, ICWED is working on a new update to the Colonias Master Plan that will include infrastructure needs assessments in all colonias and will designate specific targets for improvements. Staff reports that historic disinvestment has resulted in substandard conditions in most unincorporated communities but has increased efforts to address these issues in the last decade and will meet with residents to identify specific needs (Program 4). Infrastructure needs assessments will allow the County to prioritize the areas of greatest need to target funding.

Local Knowledge

In addition to County-led efforts to improvement investment strategies across Imperial County, staff has reported increased development interest in Salton City and the surrounding areas, as discussed earlier. Staff reported that areas surrounding Salton City, like other unincorporated communities, have limited infrastructure and, in some areas, no sidewalks, curbs, or gutters. This knowledge spurred the efforts to update the Colonias Master Plan (Program 4) to improve living conditions and infrastructure through targeted place-based revitalization and create stronger communities moving forward.

~~Which infrastructure plans have been updated? Pull whatever is available from ICWED ROP responses, Colonia's info from Esperanza~~During the consultation process, stakeholders reported issues surrounding housing condition for farmworkers and lower-income households. Substandard housing conditions reported included lack of access to water and basic infrastructure as well as a shortage of housing, making it challenging for residents to move if their home, particularly manufactured or mobile homes, is in need of repair. The Imperial County Workforce and Economic Development (ICWED) Department echoed these concerns during the Housing Element update process. According to ICWED, many colonias lack basic infrastructure such as sidewalks, water access, and lighting. These present barriers to fair housing for residents of these communities. In order to address the concerns raised through local input and experience, the County departments are currently taking steps to improve the living conditions for existing residents of these communities, including:

Updating the 2013 Colonia Master Plan – County Unincorporated to identify long term plans for unincorporated areas

Preparing a Colonia Housing Infrastructure Needs Assessment in coordination with the Imperial County Transportation Commission that will be used to identify and prioritize infrastructure needs in each colonia and promote housing development

Submitted grant applications to fund the Housing Rehabilitiation Program in Heber, Salton Sea Beach, and Niland

Secured $500,000 in HOME funds to implement the First Time Home Buyer program for all unincorporated areas, including colonias

In addition to these ongoing efforts, the County has also secured funding to complete water infrastructure improvements in Palo Verde, Seeley, and Winterhaven; public safety infrastructure improvements in Winterhaven and Niland; and to continue to conduct neighborhood cleanups. Several programs included in this Housing Element will further address fair housing issues highlighted through local input. These include coordinating with water and sewer providers to improve infrastructure, particularly in areas of concentrated poverty (Program 2), conducting the infrastructure assessment to update the Colonia Master Plan and targeting investment in place-based revitalization efforts (Program 4), conducting a survey of housing conditions for farmworkers to target rehabilitation efforts and work with employers to provide safe housing (Program 11), applying for funding to convert mobile home parks to ownership or put in control of the residents (Program 20), and continuing to apply for funding to provide general housing rehabilitation assistance throughout unincorporated areas (Program 21).

~~Other Relevant Factors~~

~~The geographic conditions in Imperial County postponed the start of development until after 1901, when the Imperial Canal was first opened to bring water from the Colorado River to the Imperial Valley. Bordered by desert and mountains, much of the county is not conducive to habitation and for much of Imperial County's history, population growth has been tied to water supply and agricultural success. With the introduction of the Imperial Canal provided water for irrigation, which spurred an agricultural economy that brought farmers to the valley, and ultimately resulted in transportation connections to San Diego and railway lines that previously hadn't existed. This change further connected Imperial County to surrounding areas, stimulating growth. However, large-scale flooding and degrading soil quality stalled development in the early 1900s in Imperial County. It wasn't until 1940 when the All American Canal brought a stable water supply, and power, back to the County did farming and other local economies growth once again. The history of Imperial County has been tied closely to the terrain and limitations it presented and most development did not begin in the county until after national segregation trends such as redlining. There is no history of redlining in Imperial County, a practice in which federal home mortgage loans were systematically denied to minority households, and the industry in Imperial County draws workers from neighboring communities in Mexico, just across the border. As a result, while Imperial County has a higher poverty rate and lower median income than surrounding jurisdictions, many patterns identified in this assessment of fair housing are not related to county policies such as exclusionary zoning or racial covenants. The primary driver of segregation in Imperial County is access to economic opportunity and healthy neighborhoods, as described throughout this assessment.~~

Mortgage Loan Denial Rates

Data related to home loan applications is made available annually through the Consumer Financial Protection Bureau, through the Home Mortgage Disclosure Act (HMDA). The Consumer Financial Protection provides mortgage data specific to census tracts as opposed to jurisdiction boundaries, so data for Imperial County includes census tracts in both incorporated and unincorporated areas.

In 2020, White applicants accounted for 5 percent of all mortgage loan applications for home purchase and 9 percent of all originated loans in Imperial County. While Hispanic residents make up approximately 76 percent of Imperial County's ethnic composition, Hispanic and Latino applicants comprised 36 percent of loan applications and 68 percent of originated loans. Black applicants represented less than one percent of both loan applications and originated loans and Asian applicants represented less than one percent of loan applications and 1 percent of originated loans, and other applicants (e.g. American Indian, Alaskan Native, Native Hawaiian other Pacific Islander, two or more races, and other) represented a total of approximately 20 percent loan applications and originated loans, reflecting a similar representation in Imperial County's population.

In 2020, applicants applied for three types of loans for home purchase: conventional, Federal Housing Administration (FHA), and Veterans Administration (VA) loan. In 2020, Black applicants had the lowest denial rates for conventional loans, Asian applicants the lowest denial rate for FHA loans and VA loans, and White applicants had the lowest denial rate for USDA loans. Hispanic and Latino applicants had the highest participation in each of the loan types and had denial rates of 10 percent for conventional loans, 8 percent for FHA loans, 13 precent for VA loans, and 6 percent for USDA loans, all of which are comparable denial rates to White applicants. Denial rates do not indicate that Hispanic or Latino residents had greater challenges securing loans than other racial and ethnic groups. However, the low participation rate by residents of minority groups may suggest difficulty building capital necessary to pursue home ownership and presenting a barrier to economic mobility.

To address the disparities in access to financial resources for underrepresented populations, Imperial County will coordinate with employers, service providers, and legal service providers to educate residents on rehabilitation and homeownership assistance programs, as well as other programs, to assist in financial independence (Programs 11, 12, 14, and 21).

Enforcement and Outreach Capacity

The County enforces fair housing and complies with fair housing laws and regulations through a twofold process: review of County policies and code for compliance with State law and referring fair housing complaints to appropriate agencies.

The County reviewed and amended Division 5 of Title 9 (the Zoning Ordinance) to ensure compliance with fair housing law, and continues to examine land use policies, permitting practices, and building codes to comply with state and federal fair housing laws. Periodic reviews of the zoning code and policies confirm that, as the county changes, it continues to ensure and enforce that all persons have access to sound and

affordable housing. The County has also included Programs ~~7~~ 8 and ~~15~~ 16 to amend the Zoning Ordinance to reflect new changes to State law and Program ~~22~~ 23 to develop a proactive code enforcement program to connect lower-income households in areas of concentrated rehabilitation need with rehabilitation assistance.

In addition to assessing fair housing issues related to development standards, fair housing issues can include housing conditions and discriminatory behaviors by landlords. Imperial County complies with fair housing law regarding complaints by internally reviewing and responding to fair housing complaints and distributing fair housing information to the real estate industry and posting information in public buildings. To date, no fair housing complaints have been made to the County; therefore, the County has not enforced fair housing laws as a result of reported discriminatory action. Residents of Imperial County also have access to services provided by the California Rural Legal Assistance (CRLA), HUD's Department of Fair Housing and Equal Opportunity (FHEO), and the California Department of Fair Employment and Housing (DFEH).

CRLA serves low-income individuals and provides services for farmworkers in Imperial County. ~~In~~ December 2020, CRLA shared that the complaints they receive regarding fair housing can range from housing discrimination against farmworkers, issues with landlords, to administrative complaints. They emphasized that housing issues such as discrimination by landlords or land use compatibility issues have resulted in undesirable housing conditions for farmworkers and substandard housing conditions due to lack of access to water or basic infrastructure for some low-income residents. The shortage of housing for extremely low-income individuals and short-term housing for migrant workers are two of the largest barriers to fair housing for residents that CRLA works with in Imperial County. CRLA does not track the number of complaints they receive from specific jurisdictions or regions so was unable to provide a number of cases that have been pursued and enforced in Imperial County. To address the housing conditions concerns raised by CRLA, the County has included Programs ~~10~~ 11 and ~~22~~ 23 and to address safety concerns in farmworker and transitional housing and Program ~~21~~ 22 to provide rehabilitation assistance, when feasible.

In its 2019 Annual Report, the DFEH reported that it did not receive any housing complaints from residents of Imperial County. As part of the Fair Housing Assistance Program (FHAP), DFEH dual-files fair housing cases with HUD's Region IX FHEO, which is able to identify the specific jurisdiction from which a complaint originates. According to HUD's Region IX FHEO, one fair housing discrimination case was filed with and accepted by HUD from an unincorporated area (Salton City) of Imperial County from January 1, 2013, through March 31, 2021. The case alleged discrimination based on race and color; however, the case was closed after HUD made a finding of no cause. In addition to this case, two inquiries with unknown reasons for the alleged discrimination were sent to HUD to determine their validity. In reviewing these cases, one was closed after the claimant did not respond to HUD's follow up and one was found to not be a valid issue. In contrast to the lack of local cases pursued by DFEH and HUD in Imperial County, the county of Los Angeles had 222 housing-related fair housing complaints filed with DFEH in 2019, 46 complaints in Orange County, 36 in Riverside County, 21 in San Bernardino, and 14 in Ventura County. As in all jurisdictions, the number of cases reported to local, state, and federal fair housing organizations may not capture the full extent of discrimination issues as some individuals may choose not to report an incident. However, the number of cases reported elsewhere in the SCAG region indicates that either there are fewer fair housing

cases that exist in Imperial County compared to other counties, or that residents are not reporting issues they are experiencing.

CRLA and DFEH were unable to provide specific location information for cases either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the County was unable to conduct a complete spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the county. Program ~~19~~ 20 has been included to work with fair housing enforcement organizations and agencies to track issues and identify patterns in the county.

Sites Inventory

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity. The California Tax Credit Allocation Committee (TCAC) and HCD prepared opportunity maps that identify resource areas. Areas of high or highest resource have increased access to public services, educational and employment opportunities, medical services, and other daily services (e.g., grocery, pharmacy). Figures A-1 through A-10 included in this sites inventory analysis present the percentage of projected units by income category and overall County land that fall into each category of the following indicators to assess how the sites inventory will affirmatively further fair housing: opportunity areas, predominant population, low- to moderate-income population, female-headed households, population with a disability, jobs proximity, educational score, environmental conditions, overcrowding, and overpayment for both renters and homeowners.

Potential Effect on Patterns of Integration and Segregation

Figure B-1 shows the distribution of resource categorization throughout the County, as defined by TCAC/HCD. The sites identified to accommodate the lower-income housing need are located in several unincorporated communities where there is demand and a need for more affordable housing, including the communities of Heber and Salton City and in the McCabe Ranch II Specific Plan adjacent to the City of Brawley. While many areas in unincorporated Imperial County where communities are located are considered low resource on the TCAC/HCD Opportunity Map, the County has noted extensive demand both from residents seeking to build on their property and developers seeking to build larger housing projects. In the Salton Sea area, there is a high rate of poverty and more limited access to jobs and services, but also regular requests to the County from home and property owners to build additional housing in this area. The community of Heber has been designated as a moderate resource area that provides local job opportunities and other services for residents. The McCabe Ranch II Specific Plan is located in a high resource area within close proximity of jobs, retail, and other services in the City of Brawley. Additionally, development of lower-income units in a specific plan development facilitates integration of lower-, moderate-, and above moderate-income units and provides access to the same resources develops as part of the specific plan, including open space, service, and job opportunities. The sites identified in Table A-29 and A-29A have the potential to provide additional affordable housing options for existing residents to

move into more suitable housing if needed or new residents to secure housing. While the sites in the Salton Sea area and Heber have all been identified for lower-income housing, they expand housing mobility opportunity for residents. Many existing residents in the Salton Sea area face chronic overpayment due a shortage of affordable housing, an issue that will be alleviated by planning for new low-income units.

Figure A-1and Table A-26 contain breakdowns of anticipated realistic capacity of sites and affordability levels in each resource area. While all above moderate-income units are anticipated in moderate and high/highest resource, areas, the integration of moderate-income units in low-resource areas will promote mixed-income communities and the inclusion of low-income units in moderate, high, and highest resource areas will facilitate housing mobility opportunities for these households. The construction of lower-income units in low resource areas will aid in reducing displacement risk for households in these communities. Additionally, the County has included Program 9 to encourage the construction of ADUs in high resource areas to further promote housing mobility opportunities

FIGURE A-1

UNITS AND COUNTY ACREAGE BY TCAC RESOURCE AREA CATEGORY

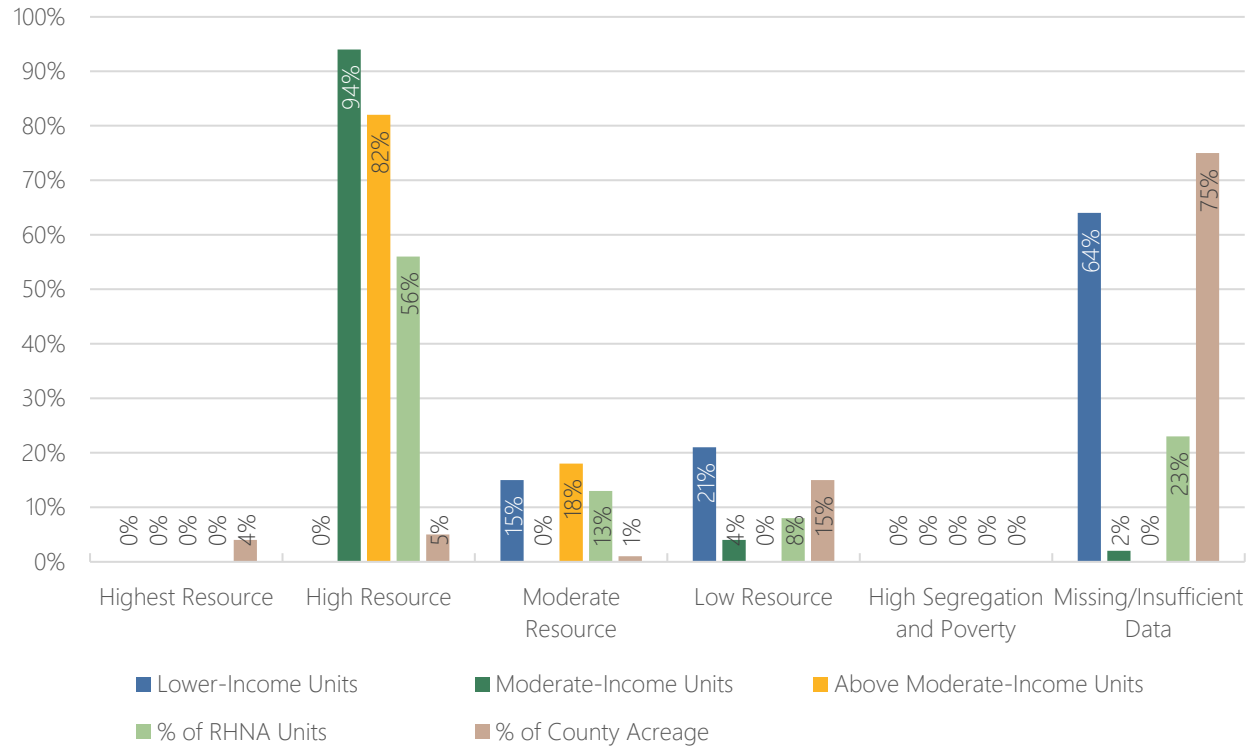


TABLE A-26A
UNITS BY TCAC RESOURCE AREA CATEGORY

Resource Designation	Income Category			Total RHNA
	Lower	Moderate	Above Moderate	
Highest Resource	0	0	0	0
High Resource	0	1,562	2,812	4,374
Moderate Resource	414	0	633	1,047
Low Resource	578	75	0	653
High Segregation and Poverty	0	0	0	0
Missing/Insufficient Data	1,739	31	0	1,770
Total	2,731	1,668	3,445	7,844

While additional affordable housing units will alleviate overpayment and thus enable the occupants to save or spend their incomes in other ways, such as a future home purchases or repairs, in the short term there is potential for continued concentration of poverty in the Salton Sea area. However, in order to combat this, the construction of 287 lower-income units in the specific plan will ensure housing mobility opportunities exist for lower-income households and will alleviate isolation of these households in areas of concentrated poverty. Furthermore, the County has included the following programs for place-based revitalization:

Program 4 – Colonia Master Plan. The County will assess infrastructure in colonias, including Salton Sea, through in-person surveys to prioritize public investment in basic infrastructure.

Program 20 – Improve Low Resource Areas Access to Opportunities. Integration includes providing equitable access to resources for all households regardless of income. The County will therefore meet with local agencies and organizations to increase community services and transit in areas of concentrated poverty to facilitate place-based revitalization and aid in mobility through access to employment.

Program 21 – Housing Rehabilitation. The County will seek funding to provide rehabilitation assistance to low-income households.

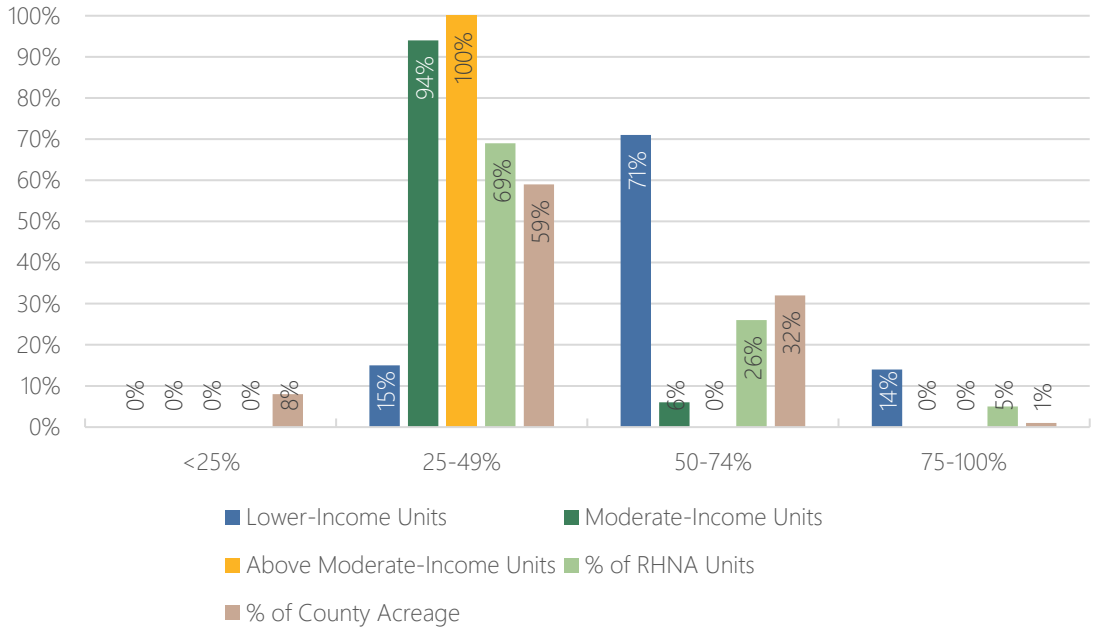
The sites located in Heber and the McCabe Ranch II Specific Plan are near incorporated jurisdictions and in areas with a lower rate of poverty than is found in Salton Sea. Incorporation of affordable housing will aid in integration by facilitating development of mixed-income community with housing opportunities near amenities for lower-income households. Additionally, the County has also identified the 101 Ranch and Rancho Los Lagos specific plans as suitable sites for moderate and above moderate-income housing. However, the R-3 and High Density Multi-Family zones in these specific plans allow for the appropriate density to develop lower-income units. Upon development, it is likely that affordable units will be incorporated in the specific plans, thus creating mixed-income neighborhoods and housing opportunities

for lower-income households near services and amenities that are anticipated to be developed as part of the specific plan processes.

The sites identified to meet the lower- through above moderate-income unit allocation will combat existing patterns of segregation by alleviating cost burden in areas of concentrated poverty and expanding housing mobility opportunities for low-income households and will facilitate integration through development of mixed-income communities and increasing the availability of resources and jobs for all households.

As shown Figures A-2 and B-5, approximately 8 percent of the land in Imperial County has less than 25 percent of the population earning low- to moderate-incomes, while 91 percent of land area has 25 to 74 percent of the population in the low- to moderate-income categories. This reflects the lower median incomes in most of the county, outside of incorporated jurisdictions and their immediately adjacent areas. The sites inventory identified in this Housing Element have 71 percent of its lower-income units in areas where 50 to 74 percent of the population is low- to moderate- income, largely in the Salton Sea area, to provide much needed housing for lower-income households at risk of displacement in these areas. By locating most of the lower-income sites in these areas, the County intends to facilitate housing opportunities for the growing populations in these areas that remain lower-income, and existing households that report substandard housing conditions, overcrowding, and overpayment. The sites to meet the moderate- and above moderate-income RHNA are predominantly in areas where 25 to 49 percent of households are low- to moderate-income, encouraging mixed-income communities in these areas.

FIGURE A-2
UNITS AND COUNTY ACREAGE BY PERCENT OF THE POPULATION WITH LOW TO MODERATE INCOMES



As identified in the assessment of fair housing, most of the population of Imperial County is located in the western portion of the County. The eastern portion, with the exception of Winterhaven, is predominantly White, with a population of 1,266 and Winterhaven is predominantly Native American, with a population of 3,052, while the western portion is predominantly Hispanic with the remainder of the County's population. Therefore, while there is a larger number of acres that have a population that is predominantly White (see Table A-26B), a larger portion of the population, and the most populated portion of the County, is predominantly Hispanic. With this in mind, the sites inventory has identified all of its sites in areas that are predominantly Hispanic, corresponding with the areas with the closest proximity to most services and existing housing. Increasing the housing supply in the western portion of Imperial County will provide housing mobility opportunities for residents of all socioeconomic groups and will ensure residents remain proximate to services.

TABLE A-26B

UNITS AND COUNTY ACREAGE BY PREDOMINANT POPULATION

Percent of Dominance	County Acreage			Projected Units by Income Category			RHNA
	Hispanic	White	Native Am.	Lower	Moderate	Above Moderate	
<10% gap	3%	0%	1%	0%	0%	0%	0%
10-50% gap	35%	0%	0%	85%	100%	82%	87%
>50% gap	8%	53%	0%	15%	0%	18%	13%
Total	100%			100%	100%	100%	100%

On approximately 21 percent of the land area in Imperial County, 20 to 39 percent of households are female-headed, single-parent households with children (see Figures A-3). As identified, this group is not large in Imperial County, but does appear to be concentrated in specific areas (see Figure B-6), and this population typically requires more affordable, multi-bedroom units due to family size paired with a single-source income. In order to displacement risk for these households, 21 percent of lower-income units have been identified on sites in areas with this rate of female-headed households. However, in order to assist in reducing the existing concentrations of these households, encourage access to mixed-income communities and areas of higher opportunities, and provide housing mobility opportunities, the County has identified 29 percent of units in areas with lower concentrations of female-headed households. Similarly, while most moderate- and above moderate-income units have been identified in areas with a lower rate of female headed households, additional opportunities have been identified in areas of concentration.

FIGURE A-3
UNITS AND COUNTY ACREAGE BY FEMALE HEADED HOUSEHOLDS

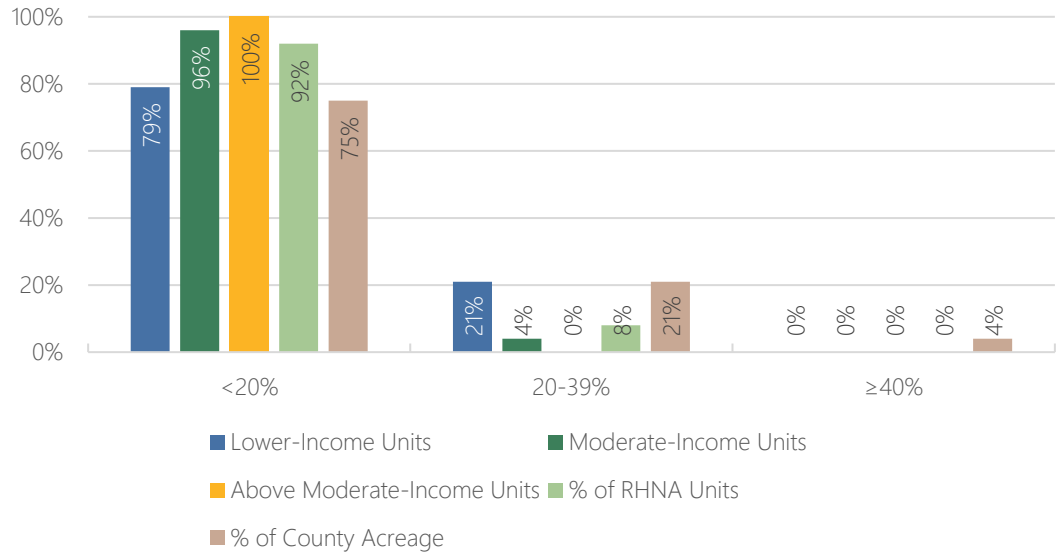
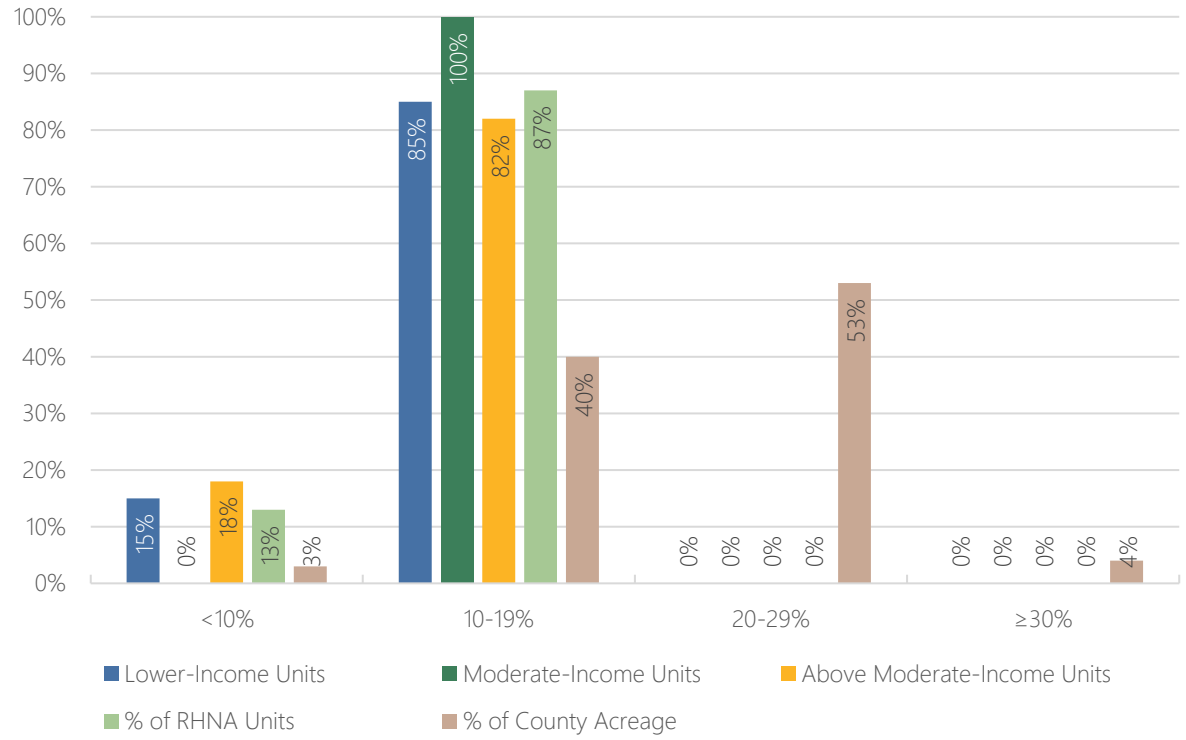


Figure A-4 reports that the 20 percent or more of the population on approximately 59 percent of the land area in Imperial County has a disability. However, as shown in Figure B-7, this land area is largely made up of eastern Imperial County (54 percent of acres in the County), where the 2015-2019 ACS estimates there is a population of 706 persons, where 22 percent (160 persons) have a disability. It is likely that most of this population resides in the Palo Verde area and the census tract is geographically large to account for a small population. The Niland area, which accounts for the remaining 4 percent of land with a disability rate over 20 percent, has a reported population of approximately 35, almost all of whom are seniors. The large majority of Imperial County's population resides in the western portion, west of Niland, where the percent of the population with a disability is less than 20 percent. Figure A-4 demonstrates the distribution of projected units by income category based on the percent of the population with a disability, indicating that the larger portion of the populated County, which has a disability rate ranging from 10-19 percent, will have the largest share of the RHNA units, with units at all income categories to provide mobility opportunities. Units will also be allocated in areas with lower rates of disability to ensure all residents have access to housing opportunities. While no sites were identified for units in the Niland or eastern Imperial County areas, the County has included Program 4 to conduct assessments of the Colonias to identify strategies and funding to improve housing and living conditions so all persons, regardless of disability status, have access to safe and accessible housing.

FIGURE A-4
UNITS AND COUNTY ACREAGE BY PERCENT OF THE POPULATION WITH A DISABILITY



~~Units by Resource Area Designation~~

Potential Effect on Access to Opportunity

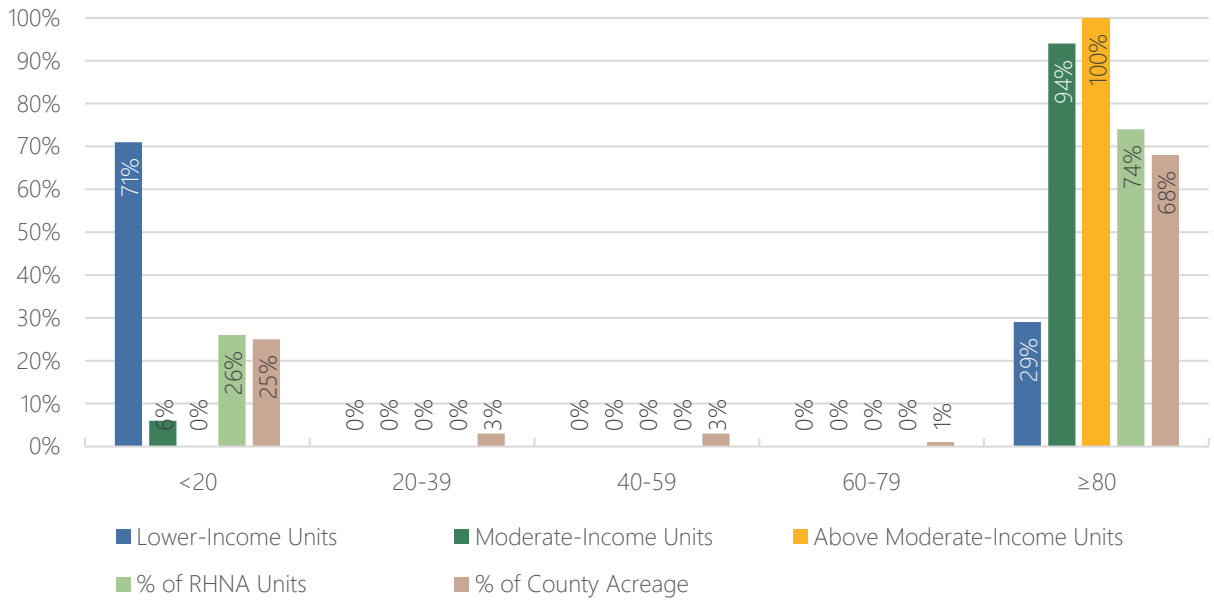
Due to the predominantly rural nature of unincorporated Imperial County, many households in unincorporated areas tend to have relatively longer distances between housing and jobs or schools compared to households in incorporated jurisdictions. However, these unincorporated areas have a significant demand for affordable housing, including multi-family rental opportunities and manufactured home rental or ownership opportunities. Therefore, the sites identified in the Salton Sea area, Heber, and the McCabe Ranch II Specific Plan will meet this demand. Additionally, the sites identified to meet the moderate- and above moderate-income unit allocation are located in the high opportunity area south of the City of Brawley, where new residential units will be in close proximity to jobs, transit, and other services available in the city. Development of specific plans with moderate- and above moderate-income units often includes, or encourages, development of employment opportunities and services nearby, which will further increase access to opportunity for all households in the vicinity including lower-income units constructed within the McCabe Ranch II Specific Plan.

In order to improve access to resources in low resource areas and encourage economic mobility for all residents, the County has included Program 2 to expand public water and sewer capacity in unincorporated areas, Program ~~21~~ 22 to assist with rehabilitation and repair of housing for low-income households, and

Program ~~28~~ 29 to facilitate lot consolidation for specific plans. Additionally, the County will work with transit agencies to assess demand to expand their routes to connect residents to resources (Program ~~20~~21). The County's strategies to expand infrastructure and services into underserved unincorporated communities and improve environmental conditions will affirmatively further fair housing by addressing both housing need and improving access to resources.

As shown in Figure B-8, the sites identified to meet Imperial County's RHNA are located in areas that are either considered with the closest proximity to employment, or the furthest. While 71 percent of lower-income units to meet the RHNA are anticipated in area with the furthest proximity to jobs (see Figure A-5), most of these are in the Salton City and Salton Sea Beach area, where it is unlikely that there is a drastic difference in job access between communities, as is shown in Figure B-8. However, most large employers are located in incorporated cities and eastern Imperial County, which are not proximate to the western shore of the Salton Sea. The lower-income units identified on the western shore are in response to developer and resident interest in increasing the supply of lower-income units to promote homeownership opportunities, reduce displacement risk due to existing substandard conditions, and alleviate overpayment and overcrowding. The remaining 29 percent of lower-income units, and 74 percent of the overall RHNA, have been identified in areas with close proximity to jobs, thus providing housing mobility opportunities for all income categories in high resource areas that may facilitate further economic opportunities.

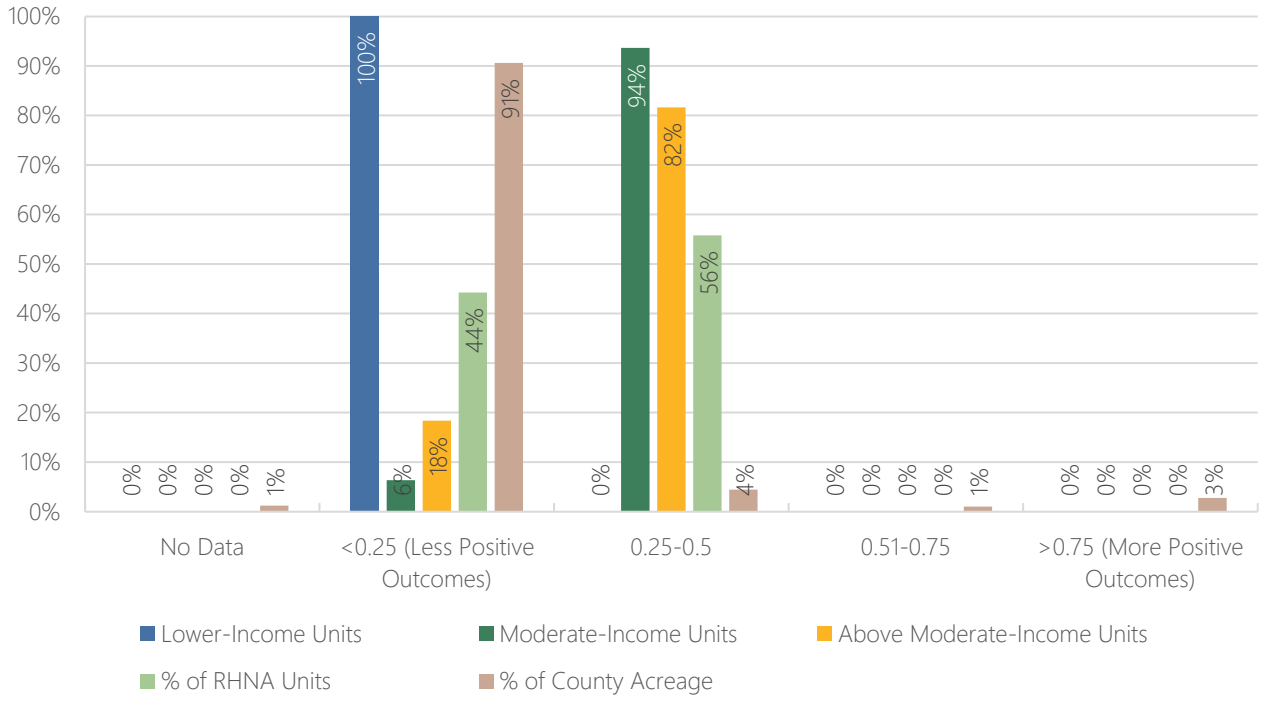
FIGURE A-5
UNITS AND COUNTY ACREAGE BY JOB PROXIMITY



As most of Imperial County has a poor expected educational outcome for students (Figure A-6), approximately 44 percent of the County's anticipated units to meet the RHNA are located in areas with an educational score of less than 0.25 out of 1. This portion of the RHNA is made up largely of lower-income units, which are distributed throughout the County to meet demand for more safe, sanitary, and affordable

housing. Moderate- and above moderate-income units are identified in the 101 Ranch, Rancho Los Lagos, and McCabe Ranch II specific plan areas, which are partially located in areas with a slightly better education score, falling into the 0.5 to 0.75 range. While the sites inventory concentrates lower-income units in areas with poor educational scores, given the extent of this status, the sites are not expected to further segregate lower-income households from stronger educational opportunities. Instead, providing more stable housing paired with integrating some moderate- and above moderate-income units in low scoring areas may encourage better living conditions that will support families, and thus provide a larger base to provide educational opportunities for.

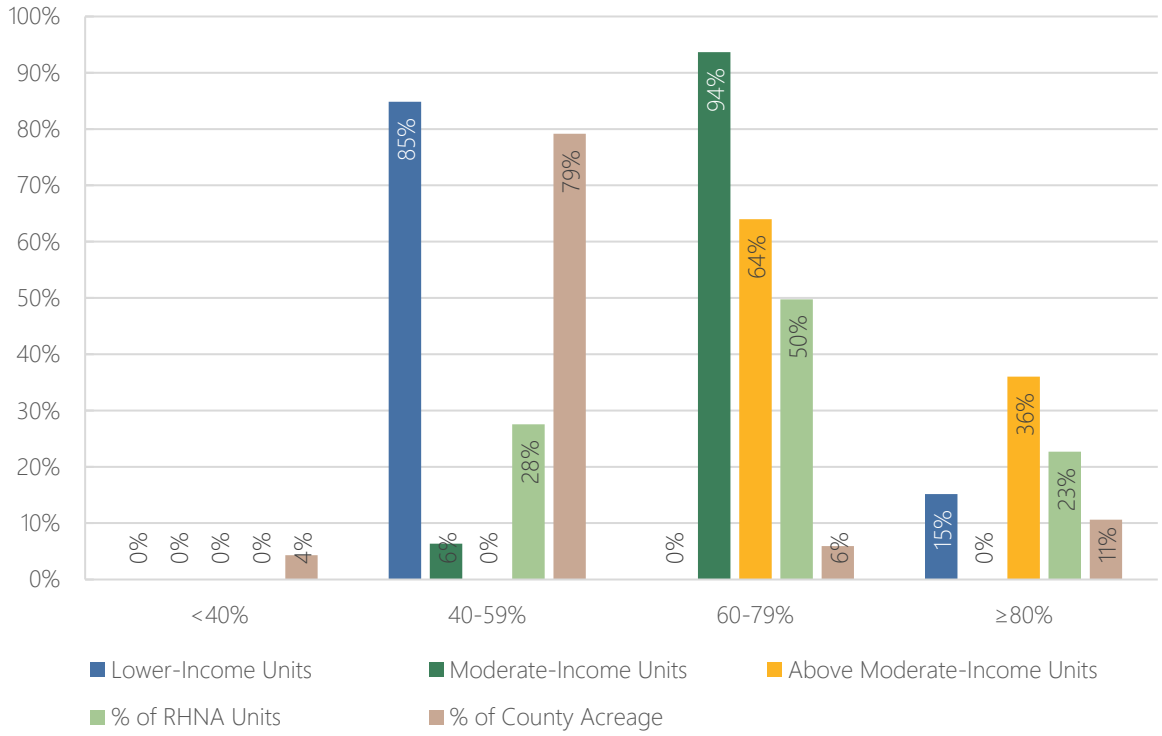
FIGURE A-6
UNITS AND COUNTY ACREAGE BY TCAC EDUCATION SCORE



The sites identified to meet the County's RHNA are anticipated to combat the existing patterns of lower-income areas coinciding with poor environmental conditions, by locating approximately 85 percent of the anticipated lower-income units in areas with more positive environmental scores (Figure A-7). Approximately than 4 percent of the land area in Imperial County has better environmental conditions than a score of 40, indicating that siting lower-income units is areas with scores ranging from 40 to 59 are the strongest available environmental conditions. Moderate-income units are concentrated adjacent to the City of Brawley where environmental scores range from 60 to 79, while above moderate-income units are distributed across a variety of conditions. Given the poor environmental conditions in Imperial County, identifying sites in a variety of conditions will ensure that there are housing opportunities regardless of socioeconomic status in a range of places to reduce congestion that may worsen negative conditions resulting from traffic or associated impacts. Implementation of Program 21 paired with the distribution of

sites will aid in improving environmental conditions for all areas in the County, including where units are projected.

FIGURE A-7
UNITS AND COUNTY ACREAGE BY ENVIRONMENTAL JUSTICE SCORE

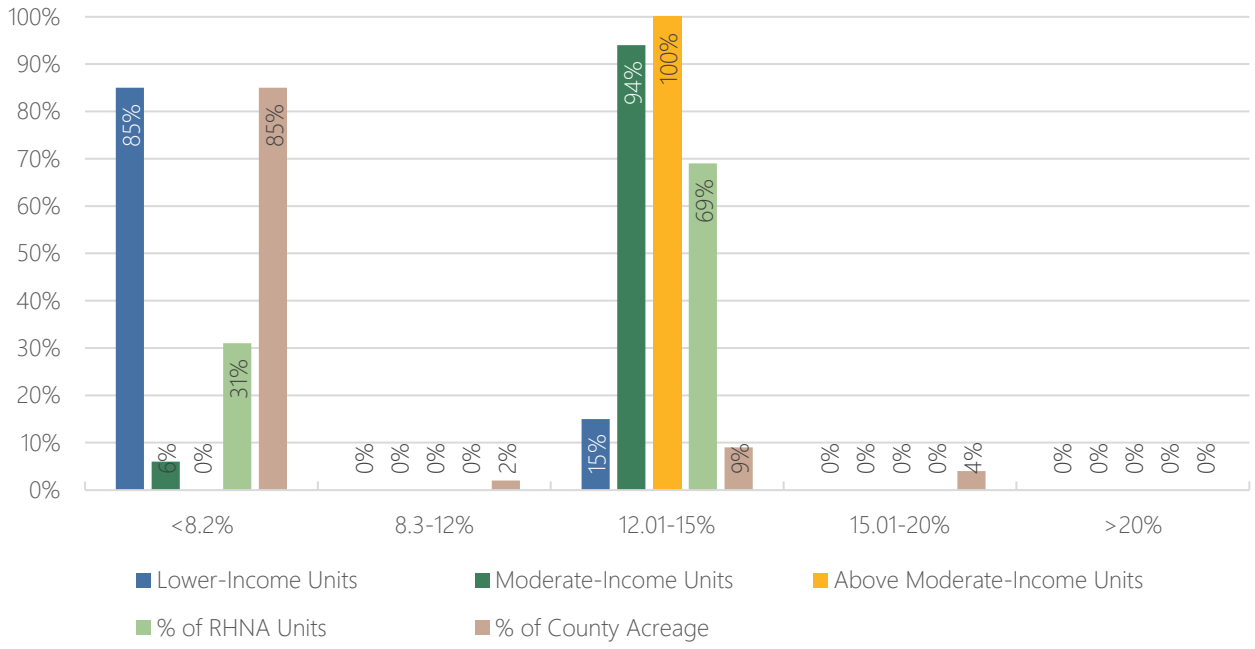


Potential Effect on Displacement Risk

As identified in this assessment, overpayment is a problem in all developed areas of Imperial County, particularly for lower-income households. Overpayment rates among renters are highest in the center of the county, where there tend to be more rental opportunities, and overpayment among owners higher near the Salton Sea and Heber. The County is actively combating this issue by identifying sites for affordable housing in these communities to increase the supply of housing, thus addressing existing demand. The Housing Element sites were selected in an effort to increase the supply of affordable units in areas of concentrated overpayment and address the shortage of vacant units. The housing opportunities presented by these sites will aid in preventing future displacement of low-income residents from their homes and communities while also providing additional units for households that may currently be living in overcrowded situations to afford housing. Additionally, the moderate- and above moderate-income sites will easy pressure on the housing stock, thus potentially reducing displacement risk and overcrowding for these households as well as more units become available.

In approximately 85 percent of Imperial County, less than 8.2 percent of households are overcrowded (Figure A-8). While just 31 percent of the projected RHNA units are located in this share of the County, the moderate- and above moderate-income units have been identified in specific plans located in areas with higher overcrowding rates. Fifteen percent of lower-income units have also been identified in areas with higher overcrowding rates to provide housing opportunities to reduce displacement risk for lower-income households that may be "doubling up" with other households to afford their existing housing.

FIGURE A-8
UNITS AND COUNTY ACREAGE BY PERCENT OF OVERCROWDED HOUSEHOLDS



As shown in Figure A-9, all projected units, regardless of expected income, are on sites located in areas where 40 to 59 percent of homeowners are cost burdened. This rate of overpayment for homeowners can be found in approximately 50 percent of Imperial County, while there are lower rates of overpayment among renters, but in a larger area of the County (Figure A-10). As stated previously, renter households are concentrated in the center of the county, in or near incorporated jurisdictions, while many unincorporated communities, particularly near the Salton Sea, are largely owner households. Typically, above moderate-income units are unaffordable to cost-burdened households, while lower- and moderate-income housing units can help alleviate overpayment. Sites for new units have been identified across a range of renter overpayments rates and in the largest area of high overpayment for owners with the intent of increasing the supply affordable housing for all income categories, thus reducing risk of displacement due to overpayment.

FIGURE A-9
UNITS AND COUNTY ACREAGE BY PERCENT OF HOMEOWNERS OVERPAYING FOR HOUSING

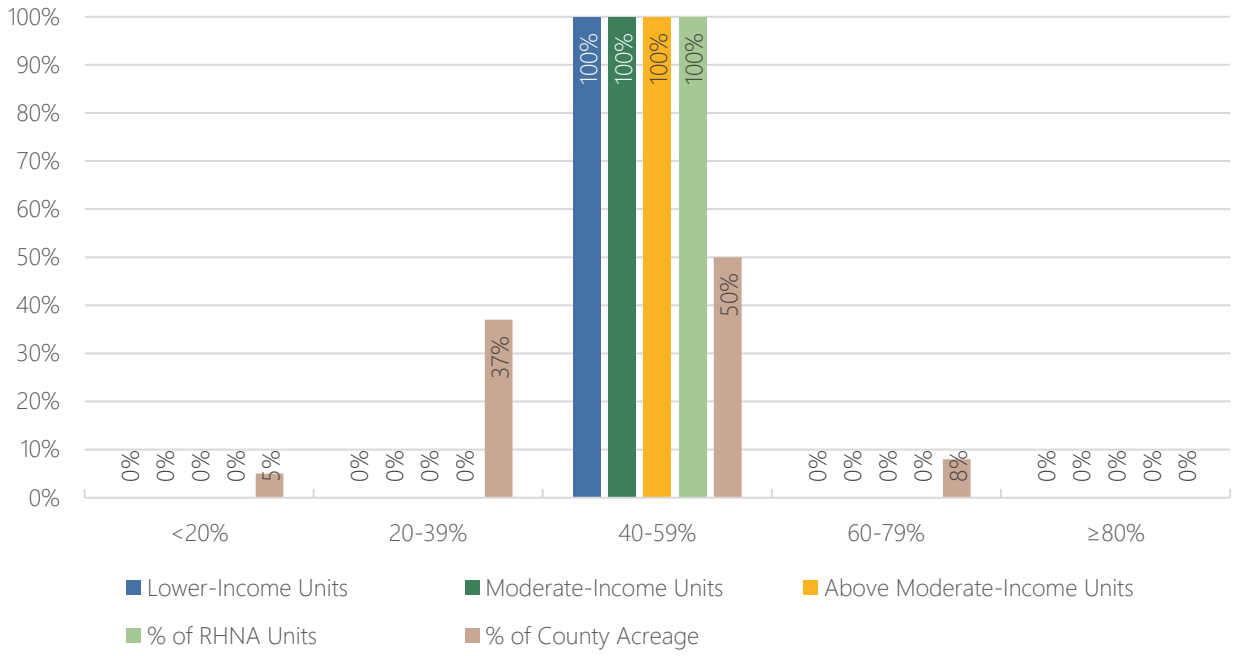
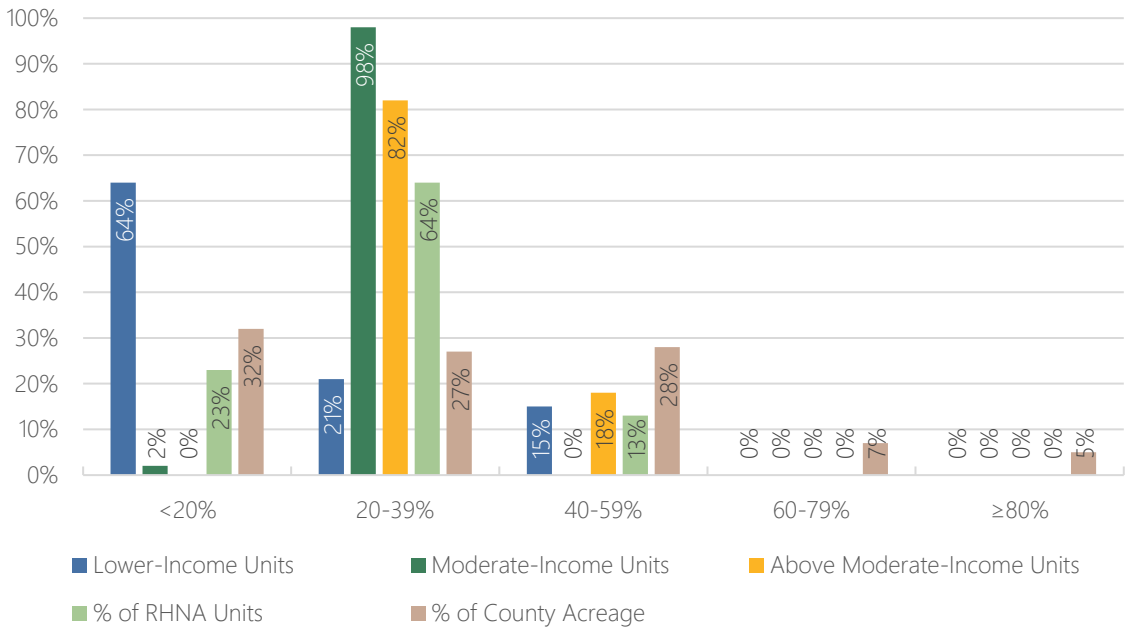


FIGURE A-10
UNITS AND COUNTY ACREAGE BY PERCENT OF RENTERS OVERPAYING FOR HOUSING



Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the County identified factors that contribute to fair housing issues in Imperial County, as shown in Table A-26. While there are several strategies identified to address the fair housing issues, the most pressing barriers are the limited economic mobility and displacement risk, that may prevent lower-income households from securing safe and stable housing. Therefore, the County has identified the factors that contribute to these issues as priorities in combatting fair housing issues and facilitating place-based revitalization in unincorporated Imperial County.

TABLE A-26
FACTORS THAT CONTRIBUTE TO FAIR HOUSING ISSUES IN IMPERIAL COUNTY

AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
Displacement of residents due to economic pressures.	Shortage of affordable housing. Cost of repairs and rehabilitation. Dominance of manufactured homes as the affordable option, which does not provide much opportunity for economic mobility.	Integrate affordable housing into Specific Plan developments (Program 3). Assist with acquisition, rehab, and construction of affordable housing (Program ~~4~~5). Incentivize construction of ADUs (Program ~~9~~10). Provide technical assistance, streamlining, and incentives to support affordable housing development (Program ~~13~~14). Allow SROs without a use permit (Program ~~18~~19). Promote CalWorks in rural areas of the county (Program ~~20~~201). Provide rehabilitation and weatherization loans for lower-income households (Program ~~21~~212). Work with affordable housing providers to preserve units (Program ~~23~~234). Facilitate lot consolidation to support affordable housing developments (Program ~~29~~3027).

AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
Displacement of farmworkers.	Shortage of short-term rental units for migrant worker housing. Shortage of extremely low-income housing. Poor conditions in transitional housing options.	Provide regulatory incentives to encourage construction of housing for special-needs groups (Program ~~10~~11). Collaborate with agricultural employers to identify opportunities for farmworker housing (Program ~~11~~12). Conduct a survey of farm worker housing conditions (Program ~~11~~12). Implement proactive code enforcement for substandard housing units (Program 22).
Access to services.	Limited and infrequent transit routes to unincorporated communities. Lack of schools in communities surrounding the Salton Sea. Size of student body needed to support construction of a school.	Work with service districts to increase capacity (Program 2). Support social service agencies secure funding to provide housing-related services (Program ~~12~~13). Distribute information on homeless and community assistance programs (Program ~~14~~15). Ensure residents with disabilities have access to services or referral programs (Program ~~17~~18). Work with transit agencies to increase mobility and routes to schools during the school year, as needed (Program ~~20~~201). Promote employment services, community services, and medical services in low-resource areas (Program ~~20~~201).
Disproportionate access to basic infrastructure (i.e. sidewalks, curbs, etc.).	Lack of investment in colonias. Funding shortages. Rural nature of unincorporated communities. Concentrations of poverty	Provide assistance to water and sewer providers to expand availability and capacity (Program 2). Conduct an infrastructure needs assessment in colonias (Program 4).

AFH Identified Fair Housing Issues	Contributing Factors	Meaningful Actions
		Improve access to resources in low-resource areas (Program 20).
Displacement of residents due to overcrowding.	Shortage of larger affordable housing units. Low-vacancy rate due to insufficient housing supply.	Identify and address barriers to constructing units with three or more bedrooms (Program ~~12~~13). Provide technical assistance, streamlining, and incentives to support affordable housing development and expand supply (Program ~~13~~14).

Areas with limited access to services and education or with poor housing conditions are most likely to experience fair housing issues. Given that these issues are present throughout Imperial County, the County has identified the above as contributing factors and barriers to fair housing and has included implementation strategies throughout the goals, policies, and actions in this Housing Element to further fair housing and address historical patterns of segregation and poverty beyond just the program required to satisfy AB 686 (Program ~~20~~21).

Housing Resources and Opportunities

Regional Housing Needs

State law (California Government Code Section 65580 et seq.) requires the California Department of Housing and Community Development (HCD) to project statewide housing needs and allocate the anticipated need to each region in the state. For much of Southern California, including Imperial County, HCD provides the regional need to the Southern California Association of Governments (SCAG), which then distributes the Regional Housing Needs Allocation (RHNA) to the cities and counties within the SCAG region. SCAG allocates housing production goals for cities and counties based on their projected share of the region's household growth, the state of the local housing market and vacancies, and the jurisdiction's housing replacement needs.

Imperial County's share of the 2021 to 2029 RHNA planning period is 4,301 units for the unincorporated areas. Refer to Table A-27 for a breakdown of units by income category.

TABLE A-27
UNINCORPORATED IMPERIAL COUNTY REGIONAL HOUSING NEED, 2021-2029

Income Category	2021-2029 RHNA	Percent of Total
Extremely Low Income*	601	14.0%
Very Low Income	602	14.0%
Low Income	596	13.9%
Moderate Income	580	13.4%
Above Moderate Income	1,922	44.7%
Total	4,301	100.0%

Source: SCAG 6th Cycle Final RHNA Allocation Plan, March 2021
**Note: It is assumed that the extremely low-income unit need is 50 percent of the very low-income allocation.*

Local governments can employ a variety of strategies to meet RHNA housing production goals, as provided in California Government Code Section 65583(c)(1), including vacant land zoned for residential uses, development of accessory dwelling units, and the potential for redevelopment of underutilized sites. As described in the Availability of Land section that follows, Imperial County has vacant land zoned for residential development at a range of densities to exceed the RHNA for all income categories.

Availability of Land

State Housing Element law emphasizes the importance of adequate land for housing and requires that each Housing Element "…identify adequate sites… to facilitate and encourage the development of a variety of housing types for all income levels…" (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate

services and infrastructure, such as water, wastewater, and roads. The sites listed in Table A-~~29~~ 28 are currently available and will allow for the development of a variety of housing types that will potentially meet the needs of all income groups allocated by SCAG for the 2021-2029 planning period.

Sites Identified in Previous Housing Element

Pursuant to California Government Code Section 65583.2(c)), a non-vacant site identified in the previous planning period and a vacant site that has been included in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the site is subject to a program in the Housing Element requiring rezoning within three years of the beginning of the planning period to allow residential use by-right for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Table A-~~29~~ 28 indicates (denoted in bold and italics) whether inventoried sites are subject to California Government Code Section 65583.2(c). Most sites included in the inventory for lower-income housing have been identified in previous Housing Elements. While the sites included in the lower-income inventory already allow housing by-right, the Housing Element includes Policy 1.2 to ensure housing developments in which at least 20 percent of the units are affordable to lower-income households will be allowed by-right.

Sites Appropriate for Lower-Income Housing

Housing element law requires jurisdictions to provide a requisite analysis showing that zones identified for lower-income households are sufficient to encourage such development. The law provides two options for preparing the analysis: (1) describe market demand and trends, financial feasibility, and recent development experience; or (2) utilize default density standards deemed adequate to meet the appropriate zoning test. According to state law (California Government Code Section 65583.2(c)(3)(B)), the default density standard for Imperial County is 20 dwelling units per acre. Sites 1 through 7 listed in Table A-2~~9~~8 were identified to meet the County's lower-income RHNA.

Large Sites

The County is relying on several specific plans with sites larger ~~thatn~~than 10 acres where parcels have not yet been subdivided. In an effort to determine that sites larger than 10 acres are appropriate to meet the moderate income RHNA, the County relied on the Heber Meadows project and projects from the neighboring County of Riverside.

As mentioned later in this section, Heber Meadows is located in the community of Heber and is a 16.2-acre project that is planned for 320 units affordable to lower income households.

Riverside County has recently worked with affordable housing providers to approve two 100 percent affordable projects on sites larger than 10 acres, Oasis Villa, a farm worker housing project, and a senior housing project in Vista Santa Rosa, both processed in early 2021. Oasis Villa includes 160 multi-family affordable housing units in the community of Oasis. The housing units will be 100 percent affordable to

low-income households with units ranging from one- to four-bedrooms with the intent to serve local farmworkers and their families. The project includes a commercial component consisting of a medical clinic, a market, childcare facility, and retail spaces as well as open space for recreation and retention. The 26-acre site will have approximately 3.57 acres of commercial uses and 19.06 acres of residential and open space uses. The average density of the multi-family development is approximately 8.4 dwelling units per acre. Vista Santa Rosa is a mixed-use project in the Vista Santa Rosa community. This project is proposing the consolidation of 12 parcels for a gross acreage of 26.81 for the project that will include commercial uses, and a multi-unit senior housing assisted living facility. The assisted living facility will have 128 total dwelling units, comprised of one- and two-bedroom units, for a density of approximately 9 dwelling units per acre.

These three project examples demonstrate that affordable housing is feasible on large sites. Based on these recent projects, the County assumes larger sites are appropriate to meet a portion of the moderate income RHNA, and although not assumed in the sites analysis, these sites could provide housing for lower income households.

Realistic Capacity

Imperial County has vacant land zoned for residential development at a range of densities up to 29 units per acre, with a total capacity for 13,524 units of which 3,412 units are in higher-density zones (20 to 29 units per acre), well in excess of the lower-income RHNA of 1,799.

All sites allow for at least the required default density for Imperial County of 20 dwelling units per acre. The County considered and evaluated the implementation of its current development standards and on-site improvement requirements (e.g., setbacks, building height, parking, and open space requirements) as well as, looked at a recent proposed project (see Table A-~~30~~29) to determine a realistic unit capacity for all vacant sites outside of specific plans. Specific Plans relied on 40 percent of the approved unit counts for each plan, assuming that only a portion of each plan is likely to develop during the 2021-2029 planning period.

Realistic capacity for vacant residential sites was determined by multiplying the number of acres by the maximum density for the site; a factor of 80 percent of the maximum density was applied to account for site and regulatory constraints that may limit each site from being built to 100-percent density.

The County considered the following projects to establish that an 80% realistic capacity was appropriate:

- Chelsea Investment Corporation (planned, affordable) – 76 percent realistic capacity
- Heber Del Sol Apartments (under construction, affordable) – 104 percent realistic capacity
- Desert Sunrise Units (approved pending building permit, market-rate) – 85 percent realistic capacity

~~The County also relied on a current project to determine the realistic capacity. The project is planned for 320 units on 16.2 acres, providing for 76 percent realistic capacity. This further supports the assumption that 80 percent realistic capacity is appropriate.~~

Table A-28 ~~Identified~~ provides a list of the available sites that are located within existing townsites in the unincorporated county, specifically the areas of Salton City and Salton Sea Beach. Table A-29 provides a listing of the approved Specific Plans in the county. Based on the sites included in both tables, the County has sufficient sites to meet the RHNA. ~~vacant sites range in size and include smaller single-family parcels~~

Development interest in Salton City and Salton Sea Beach has recently increased. This area is within close proximity of the cities of Coachella, Indio, Palm Desert and Palm Springs where the cost of living is very high. With the commute time being less than an hour, both Salton City and Salton Sea Beach are becoming a place of interest. County staff receives about 7 to 10 calls per week regarding development in this area, both from owners of recently purchased property or residents interested in purchasing property. A majority of calls are in reference to R-1 zoned parcels but about one-third of the calls pertain to R-3 zoned parcels. While there has yet to be new development in this area, the interest is there. The lots in and around this area have water and sewer connections available, along with electrical connection. There is an interest in innovative housing for this area including tiny homes as well as trailer homes and manufactured homes. There is also new commercial development including a family dollar store that was recently built in this area and the Torres Martinez Casino is along highway 86 which is near these cities. Based off of this data, the County believes that these sites are appropriate to accommodate a portion of the County's RHNA. ~~and large parcels in Specific Plan areas. Many higher-density sites (zoned R-3 and R-4) are between 1 and 2 acres and are located adjacent to one another, allowing for potential development in a variety of sizes. A detailed inventory of vacant residential sites is provided in Table A-29.~~

~~Vacant sites zoned for low- and medium-density residential are assumed to be appropriate for market-rate housing, affordable to households with moderate- and above-moderate incomes. Imperial County can accommodate market-rate housing well beyond the needs projected in the RHNA. Refer to Table A-28 for a comparison of the RHNA to realistic capacities for each income category.~~

~~Sites in the vacant land inventory are located in existing townsites in the unincorporated county and in Specific Plan areas, including 101 Ranch, McCabe Ranch II, and Rancho Los Lagos. Imperial County's Specific Plans are described in greater detail later in this chapter.~~

TABLE A-~~29~~28
VACANT LAND INVENTORY

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
1	001-793-009	R-2	West Shores/Salton City Urban Area	Vista Del Mar	1.38	10	13	10	None	Yes	Vacant	Moderate
2	007-301-005	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.70	10	6	4	None	Yes	Vacant	Moderate
3	001-792-011	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.64	10	6	4	None	Yes	Vacant	Moderate
4	001-723-004	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.58	10	5	4	None	Yes	Vacant	Moderate
5	001-774-003	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.55	10	5	4	None	Yes	Vacant	Moderate
6	001-723-003	R-2	West Shores/Salton City Urban Area	Vista Del Mar	0.51	10	5	4	None	Yes	Vacant	Moderate
Vacant R-2 Subtotal					4.35	_	40	30	_	_	_	_
7	054-645-001	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	1193 Dogwood Road, Heber	2.6	29	75	52	None	Yes	Vacant	Lower
8	054-645-002	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	South of the intersection of Correll Road and S Dogwood Road, Heber	2.7	29	78	54	None	Yes	Vacant	Lower
9	054-645-003	R3	Heberwood Estates High Density Residential (Heber Urban Area Plan)	South of the intersection of Correll Road and S Dogwood Road, Heber	1.1	29	31	21	None	Yes	Vacant	Lower
10	001-850-047	R-3	West Shores/Salton City Urban Area	Salton Sea Beach	8.59	29	249	199	None	Yes	Vacant	Lower
11	014-222-001	R-3	West Shores/Salton City Urban Area	Salton City	2.30	29	66	52	None	Yes	Vacant	Lower
12	014-222-002	R-3	West Shores/Salton City Urban Area	Salton City	2.27	29	65	52	None	Yes	Vacant	Lower
13	014-260-007	R-3	West Shores/Salton City Urban Area	Salton City	2.23	29	64	51	None	Yes	Vacant	Lower
14	014-294-002	R-3	West Shores/Salton City Urban Area	Salton City	2.04	29	59	47	None	Yes	Vacant	Lower
15	014-293-001	R-3	West Shores/Salton City Urban Area	Salton City	1.87	29	54	43	None	Yes	Vacant	Lower
16	014-291-003	R-3	West Shores/Salton City Urban Area	Salton City	1.86	29	53	42	None	Yes	Vacant	Lower
17	014-291-008	R-3	West Shores/Salton City Urban Area	Salton City	1.85	29	53	42	None	Yes	Vacant	Lower
18	014-260-002	R-3	West Shores/Salton City Urban Area	Salton City	1.81	29	52	41	None	Yes	Vacant	Lower
19	014-293-005	R-3	West Shores/Salton City Urban Area	Salton City	1.74	29	50	40	None	Yes	Vacant	Lower
20	014-221-001	R-3	West Shores/Salton City Urban Area	Salton City	1.73	29	50	40	None	Yes	Vacant	Lower
21	014-292-006	R-3	West Shores/Salton City Urban Area	Salton City	1.70	29	49	39	None	Yes	Vacant	Lower
22	014-292-005	R-3	West Shores/Salton City Urban Area	Salton City	1.70	29	49	39	None	Yes	Vacant	Lower
23	014-291-001	R-3	West Shores/Salton City Urban Area	Salton City	1.69	29	49	39	None	Yes	Vacant	Lower
24	014-260-003	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower
25	014-221-003	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
26	014-221-002	R-3	West Shores/Salton City Urban Area	Salton City	1.66	29	48	38	None	Yes	Vacant	Lower
27	014-293-002	R-3	West Shores/Salton City Urban Area	Salton City	1.63	29	47	37	None	Yes	Vacant	Lower
28	014-221-004	R-3	West Shores/Salton City Urban Area	Salton City	1.62	29	47	37	None	Yes	Vacant	Lower
29	014-294-001	R-3	West Shores/Salton City Urban Area	Salton City	1.56	29	45	36	None	Yes	Vacant	Lower
30	014-291-004	R-3	West Shores/Salton City Urban Area	Salton City	1.48	29	42	33	None	Yes	Vacant	Lower
31	014-260-006	R-3	West Shores/Salton City Urban Area	Salton City	1.47	29	42	33	None	Yes	Vacant	Lower
32	014-293-004	R-3	West Shores/Salton City Urban Area	Salton City	1.43	29	41	32	None	Yes	Vacant	Lower
33	014-292-004	R-3	West Shores/Salton City Urban Area	Salton City	1.38	29	40	32	None	Yes	Vacant	Lower
34	014-292-002	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
35	014-292-003	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
36	014-292-001	R-3	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Lower
37	014-293-003	R-3	West Shores/Salton City Urban Area	Salton City	1.36	29	39	31	None	Yes	Vacant	Lower
38	014-294-003	R-3	West Shores/Salton City Urban Area	Salton City	1.34	29	38	30	None	Yes	Vacant	Lower
39	014-291-007	R-3	West Shores/Salton City Urban Area	Salton City	1.32	29	38	30	None	Yes	Vacant	Lower
40	014-291-006	R-3	West Shores/Salton City Urban Area	Salton City	1.31	29	37	29	None	Yes	Vacant	Lower
41	014-260-009	R-3	West Shores/Salton City Urban Area	Salton City	1.30	29	37	29	None	Yes	Vacant	Lower
42	014-260-001	R-3	West Shores/Salton City Urban Area	Salton City	1.30	29	37	29	None	Yes	Vacant	Lower
43	014-260-008	R-3	West Shores/Salton City Urban Area	Salton City	1.27	29	36	28	None	Yes	Vacant	Lower
44	014-291-002	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
45	014-291-005	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
46	014-260-004	R-3	West Shores/Salton City Urban Area	Salton City	1.20	29	34	27	None	Yes	Vacant	Lower
47	014-260-005	R-3	West Shores/Salton City Urban Area	Salton City	1.12	29	32	25	None	Yes	Vacant	Lower
48	010-082-004	R-3	West Shores/Salton City Urban Area	Salton City	1.07	29	30	24	None	Yes	Vacant	Lower
49	015-521-010	R-3	West Shores/Salton City Urban Area	Salton City	0.97	29	28	22	None	Yes	Vacant	Lower
50	014-223-003	R-3	West Shores/Salton City Urban Area	Salton City	0.93	29	26	20	None	Yes	Vacant	Lower
51	014-223-002	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
52	014-223-004	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
53	014-223-001	R-3	West Shores/Salton City Urban Area	Salton City	0.92	29	26	20	None	Yes	Vacant	Lower
54	010-190-007	R-3	West Shores/Salton City Urban Area	Salton City	0.87	29	25	20	None	Yes	Vacant	Lower
55	017-712-001	R-3	West Shores/Salton City Urban Area	Salton City	0.79	29	22	17	None	Yes	Vacant	Lower
56	016-051-010	R-3	West Shores/Salton City Urban Area	Salton City	0.78	29	22	17	None	Yes	Vacant	Lower
57	017-712-004	R-3	West Shores/Salton City Urban Area	Salton City	0.76	29	22	17	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
58	017-712-002	R-3	West Shores/Salton City Urban Area	Salton City	0.73	29	21	16	None	Yes	Vacant	Lower
59	010-090-016	R-3	West Shores/Salton City Urban Area	Salton City	0.72	29	20	16	None	Yes	Vacant	Lower
60	010-181-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
61	017-712-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
62	014-332-004	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
63	010-082-003	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
64	014-332-005	R-3	West Shores/Salton City Urban Area	Salton City	0.71	29	20	16	None	Yes	Vacant	Lower
65	017-722-002	R-3	West Shores/Salton City Urban Area	Salton City	0.70	29	20	16	None	Yes	Vacant	Lower
66	015-570-013	R-3	West Shores/Salton City Urban Area	Salton City	0.70	29	20	16	None	Yes	Vacant	Lower
67	014-311-009	R-3	West Shores/Salton City Urban Area	Salton City	0.68	29	19	15	None	Yes	Vacant	Lower
68	017-722-001	R-3	West Shores/Salton City Urban Area	Salton City	0.67	29	19	15	None	Yes	Vacant	Lower
69	014-283-001	R-3	West Shores/Salton City Urban Area	Salton City	0.65	29	18	14	None	Yes	Vacant	Lower
70	010-190-006	R-3	West Shores/Salton City Urban Area	Salton City	0.64	29	18	14	None	Yes	Vacant	Lower
71	014-283-004	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
72	010-082-005	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
73	014-103-011	R-3	West Shores/Salton City Urban Area	Salton City	0.63	29	18	14	None	Yes	Vacant	Lower
74	010-181-002	R-3	West Shores/Salton City Urban Area	Salton City	0.62	29	18	14	None	Yes	Vacant	Lower
75	014-332-001	R-3	West Shores/Salton City Urban Area	Salton City	0.61	29	17	13	None	Yes	Vacant	Lower
76	014-332-002	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
77	014-311-002	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
78	015-570-009	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
79	014-332-006	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
80	015-372-016	R-3	West Shores/Salton City Urban Area	Salton City	0.59	29	17	13	None	Yes	Vacant	Lower
81	010-082-009	R-3	West Shores/Salton City Urban Area	Salton City	0.58	29	16	12	None	Yes	Vacant	Lower
82	014-311-026	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
83	014-311-007	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
84	014-311-008	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
85	015-570-014	R-3	West Shores/Salton City Urban Area	Salton City	0.57	29	16	12	None	Yes	Vacant	Lower
86	014-311-006	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
87	015-534-008	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
88	015-382-008	R-3	West Shores/Salton City Urban Area	Salton City	0.56	29	16	12	None	Yes	Vacant	Lower
89	010-090-017	R-3	West Shores/Salton City Urban Area	Salton City	0.55	29	15	12	None	Yes	Vacant	Lower

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
90	015-521-014	R-3	West Shores/Salton City Urban Area	Salton City	0.54	29	15	12	None	Yes	Vacant	Lower
91	017-610-030	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
92	014-332-003	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
93	015-372-011	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
94	014-193-016	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
95	016-452-027	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
96	014-311-003	R-3	West Shores/Salton City Urban Area	Salton City	0.53	29	15	12	None	Yes	Vacant	Lower
97	010-090-018	R-3	West Shores/Salton City Urban Area	Salton City	0.52	29	15	12	None	Yes	Vacant	Lower
98	015-431-001	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
99	014-103-009	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
100	015-521-015	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
101	010-181-004	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
102	010-100-011	R-3	West Shores/Salton City Urban Area	Salton City	0.51	29	14	11	None	Yes	Vacant	Lower
Vacant R-3 Subtotal					102.89	-	2938	2317	-	-	-	-
103	014-051-003	R-4	West Shores/Salton City Urban Area	Salton City	1.37	29	39	31	None	Yes	Vacant	Moderate
104	001-930-035	R-4	West Shores/Salton City Urban Area	Salton Sea Beach	8.28	7	57	45	None	Yes	Vacant	Moderate
Vacant R-4 Subtotal					9.65	-	96	76	-	-	-	-

Source: Imperial County, September 2021

TABLE A-29
SPECIFIC PLAN INVENTORY

Map Reference	APN	Zone	General/Urban Area Plan/ Specific Plan Land Use Designation	Address	Acres	Allowable Density	Maximum Unit Capacity	Realistic Unit Capacity	Environmental Constraints	Infrastructure	Existing Use	Income group
105	040-190-001; 040-190-002; 040-190-004; 040-200-001	R-1	101 Ranch Specific Plan	North of Carey Road and east of Imperial Valley Pioneers Expressway, south of Brawley	514	5	2,570	825	Mitigation for impacts to biological resources identified in Specific Plan EIR	Planned	Vacant agricultural land	Above Moderate
		R-2			651.1	8	5,209	1,462				Above Moderate
		R-3			138.2	20	2,764	508				Moderate
		CCMU			13.1	20	262	47				Moderate
Subtotal 101 Ranch					1316.40		10,805	28,41				
106	040-013-03; 040-013-04; 040-013-07	Single-Family, Medium Density	Rancho Los Lagos Specific Plan Area	North of Schartz Road, West of Dowood Road, east of Highway 86, south of City of Brawley	209	n/a	n/a	600	Mitigation for impacts to biological resources identified in Specific Plan EIR	Planned	Vacant	Moderate
		Single-Family, Low Density			268	n/a	n/a	525				Above Moderate
		High Density Multi-Family			63	24	1,512	406				Moderate
Subtotal Rancho Los Lagos					540.00		1,512	1,532				
107	054-130-042; 054-130-072; 054-130-076; 054-130-077; 054-130-078; 054-130-079	High Density Multi-Family	McCabe Ranch II Specific Plan	South of McCabe Road, West of Dogwood Road, East and North of State Highway 86, Heber	26.7	22	587	235	Mitigation for impacts to vegetation/habitats, sensitive habitats, and wildlife species identified in Specific Plan EIR	Planned	Vacant	Lower
		Gated Community High Density Multi-Family			8.6	24	206	52				Lower
		Traditional Lot, Single-Family			83.9	5	420	168				Above Moderate
		Small Lot, Single-Family			31.6	7	221	88				Above Moderate
		Flex Lot, Single-Family			68.6	9	617	247				Above Moderate
		Estate Lots, Single-Family			22.6	n/a	45	18				Above Moderate
		Mini-Estate Lots, Single-Family			25.9	n/a	112	45				Above Moderate
		Low Density, Single-Family			33.4	n/a	167	67				Above Moderate
Subtotal McCabe Ranch II					301.30		2,375	920				

Source: Imperial County, October 2021

Proposed Project

In March 2021, Chelsea Investment Corporation submitted to the County a Tentative Tract Map for a 320-unit affordable housing project on 16.2 acres located in Heber at the southwest corner of the intersection of E. Correll Road and Pitzer Road (Table A-~~30~~29). Chelsea Investment Corporation has confirmed their intent to construct and signalize the intersection, construct a sidewalk to a nearby elementary school, and other improvements to facilitate an accessible environment for residents. While the final funding source for this project has not yet been reported, Chelsea Investment is an affordable housing provider that has previously used funding through the California Tax Credit Association and HCD funding for two previous affordable projects in Heber and it is anticipated that similar funding will be used to secure affordability of the Heber Meadows project.

TABLE A-30
PENDING PROJECT – CHELSEA INVESTMENT CORPORATION, HEBER MEADOWS

Site #	APN	Zoning	General Plan Land Use	Acreage	Allowed Density	Proposed Units
108	054-604-016	R-3	Urban Area	16.2	29	320

Accessory Dwelling Unit Potential

The County considers Accessory Dwelling Units (ADUs) appropriate for low-income households as either a primary residence or as farmworker housing. Currently, there is no available data for ADU rental rates in the County. Therefore, the County relied on median monthly rental rates for one-bedroom units identified in Table A-22 as a proxy for ADU rental rates. The average monthly rent for a one-bedroom unit in Imperial County varies significantly depending on its location within the county. Low-income households can afford between $979 (one-person) and $1,398 (four-person) in monthly housing costs without being cost burdened. Comparing the rental rates with the affordability of low-income households shows that ADUs are appropriate to credit toward the County's lower-income RHNA.

Between ~~2019~~ 2018 and~~to~~ 2020, the County permitted six ADUs, an average of ~~three~~ two per year. The County projects that the annual average will ~~double~~ double during the 2021-2029 planning period as a result of increased efforts to promote and encourage construction of ADUs. Therefore, the County projects that ~~48~~ 32 ADUs will be constructed over the course of the planning period. According to SCAG's Regional Accessory Dwelling Unit Affordability Analysis released in December 2020, approximately 15.0 percent of second units in Imperial County are affordable to extremely low-income households, 7.7 percent are affordable to very low-income households, 34.8 percent are affordable to low-income households, 34.8 percent are affordable to moderate-income households, and 7.7 percent are affordable to above moderate-income households. Using this analysis of affordability, the County projects that 58 percent of ADUs, or ~~28~~ 18 units, will be affordable to lower-income households, 35 percent, or ~~17~~ 11 units, will be

affordable to moderate income households, and 8 percent or, or ~~4~~ 2 units, will be affordable to above moderate-income households.

Manufactured Home Potential

As discussed in Chapter 3, Housing Needs Assessment, of the Housing Element, Homes Direct reported that in April 2020, the most recent available data, new manufactured housing ranged in price from $64,500 to $120,300, on average.

Non-governmental constraints that may influence the affordability of a new manufactured home include land costs, transportation costs, and foundation costs as well ability to secure financing and rescale affordability. As identified in Table A-35, the average price per acre in unincorporated Imperial County varies significantly depending on location; however, most areas have low land costs and do not add a significant barrier to putting an affordable manufactured housing unit on the land. Land costs range from $1,979 in Palo Verde to $86,733 in Desert Shores, though 5 out of 10 communities cost less than $10,000 per acre. In these communities, it is unlikely that land cost is a barrier to development of mobile homes and mobile home parks. In other communities, land costs may present a barrier to this type of housing. The County analyzed the cost of purchasing, installation, and fees of a new manufactured home and estimated that the cost totals approximately $135,000 per unit. The following costs were estimated for a new 24-foot by 44-foot manufactured home:

Item	Cost
New Home	$86,000
Installation	$6,500
Foundation & Skirting	$6,800
Steps	$2,000
A/C	$6,500
Awning 11 ft. x 40 ft.	$3,520
Transportation	$3,800
Fees & Permits	$5,750
Driveways	$2,560
Fence & Gates	$7,600
Landscape	$4,000
Total	$135,030

Source: Imperial County, September 2021

Most manufactured housing developed in the county serves cost-constrained families, providing an affordable alternative to traditional stick-built development. Table A-21 shows that a four-person, extremely low-income household can afford a maximum sales price of $163,536, a very low-income household can afford a maximum sales price of $218,152, and a low-income household can afford a maximum sales price of $348,918, meaning that manufactured housing is affordable to extremely low- to low-income households.

Between 2014 and 2020, there was an average of 20 mobile/manufactured homes added to the County's housing stock per year. Projecting these 20 units over the RHNA period (eight years) gives the County a projected capacity of 160 manufactured/mobile homes.

Specific Plans

Much of the planned residential development in unincorporated Imperial County is located within Specific Plan areas, including 101 Ranch, ~~McCabe Ranch II,~~ and Rancho Los Lagos. Adopted Specific Plans have undergone environmental review and identify how adequate infrastructure, including water and sewer, will be provided. The Specific Plan descriptions herein provide an overview of the general character of each plan area and highlight development standards unique to the plan. Unless otherwise noted, standards align with those in the County's General Plan.

The General Plan anticipates and encourages the use of specific plans when designing new projects, especially those that will include large areas of land. The specific plan process allows for a more comprehensive planning process for the target area and can be a mechanism to allow for flexibility in the design and location of future land uses. Based on the development horizons for these specific plans, the County has assumed that only 40 percent of these projects would be likely to develop during the 2021-2029 planning period. This assumption is reflected in the unit counts in Table A-29.

101 Ranch Specific Plan

The 101 Ranch Specific Plan, adopted in 2012, encompasses 1,894 acres of land located between the cities of Brawley and Imperial. The plan provides for 7,481 residential units ranging from entry-level duplex homes on 4,000-square-foot lots to "move-up" homes on 8,000-square-foot lots. It is anticipated that the 101 Ranch Specific Plan will be developed generally by community beginning with the West Community, then the East Community, and finally the Central Community. -About half of the high-density units (666 units) are within the East Community and while the project is market driven, it is assumed that these units could be developed within the 2021-2029 planning period. The breakdown of units in each community are listed in Table A-31.

Units in the Low-Density Residential (R-1) and Medium-Density Residential (R-2) zones will likely accommodate above moderate-income households, while other housing types, such as the garden courts and townhomes in the Multifamily/Attached Residential (R-3) areas and Community/Commercial Mixed Use (CCMU allowing up to 20 units per acre (1,387 units), will be developed on smaller lots (as small as 2,500 square feet) and will be appropriate for low-income households. The CCMU zone allows for a mix of community-serving retail commercial, office, and employment with multifamily/attached residential (R-3) or allows for multifamily/attached residential (R-3) with no commercial component. The 1,387–unit assumption takes into account development beyond residential units and assumes that residential in the CCMU zone will account for 45 percent of the development. The County has assumed that the 101 Ranch Specific Plan will accommodate the moderate- and above moderate- income RHNA.

Note that the R-1, R-2, and R-3 designations in this Specific Plan differ from those of the County's General Plan.

Development standards in the 101 Ranch Specific Plan allow for a variety of lot configurations with required and optional development standards. Options vary by zone but typically allow trade-offs between setbacks and parking requirements. 101 Ranch is expected to be developed in three stages, beginning with the West Community, then the East Community, and finally the Central Community. Refer to Table A-31 for a summary of the size, density, and planned units in each of the three communities.

Water, wastewater, and other services for the 101 Ranch area will be financed and constructed by the developer prior to residential construction. ~~Services will likely be located outside of the plan area and constructed within the Mesquite Lake County Service Area to serve the 101 Ranch, Rancho Los Lagos, and other planned development.~~

TABLE A-31 101 RANCH SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Area/~~Zone~~Residential Lot Size	Maximum Density (units per acre)	Acres	Units[1]	Applicable Specific Plan Zone
West Community		665.7	3,229	
8,000 S.F. min~~R-1~~	3.7~~5~~	30.8~~303.9~~	113~~1,268~~	R-1
7,200 S.F. min.	3.8	67.3	257	
6,500 S.F. min.	4.1	85.5	347	
6,000 S.F. min.	4.6	120.3	551	
5,500 S.F. min.~~R-2~~	4.7~~8~~	114.4~~361.8~~	540~~1,961~~	R-2
5,000 S.F. min.	5.4	132.7	717	
4,500 S.F. min.	5.8	56.3	329	
4,000 S.F. min.	6.4	58.4	375	
Central Community		211.3	1,479	
7,200 S.F. min.~~R-1~~	3.6~~5~~	18.3~~55.2~~	66~~145~~	R-1
6,000 S.F. min.~~R-2~~	4.8~~8~~	16.3~~86.3~~	79~~612~~	
5,500 S.F. min.~~R-3~~	4.9~~20~~	20.6~~69.8~~	101~~721~~	R-2
5,000 S.F. min.	5.5	52.8	288	
4,500 S.F. min.	6.2	19.8	122	
4,000 S.F. min.	7.4	13.7	102	
Condominiums	9.4	45.2	425	R-3
Town Homes	12.0	24.6	296	
East Community[2]		426.3~~–439.4~~	2,278~~–2,396~~	
8,000 S.F. min~~R-1~~	3.6~~5~~	21.2~~154.9~~	76~~649~~	R-1

Area/~~Zone~~Residential Lot Size	Maximum Density (units per acre)	Acres	Units[1]	Applicable Specific Plan Zone
7,200 S.F. min.	4.0	38.8	156	
6,500 S.F. min.	4.2	36.5	154	
6,000 S.F. min.	4.5	58.4	263	
5,500 S.F. min.	4.9	89.5	441	
5,000 S.F. min.	5.5	70.1	387	R-2
4,500 S.F. min.	5.8	43.4	253	
4,000 S.F. min.~~R-2~~	6.8~~8~~	26.2~~203~~	179~~1,081~~	
Condominiums~~R-3~~	8.7~~20~~	42.2~~68.4~~	369~~548~~	R-3/CCMU
~~CCMU[2]~~	~~20~~	~~13.1~~	~~118~~	
Total		1,303.3–1,316.4	6,986–7,104	

Source: 101 Ranch Specific Plan, 2011

1. Units planned are from 45% to 80% of the maximum density.

~~2. The plan allows for flexibility in the Community/Commercial Mixed Use (CCMU) zone and the purpose is to provide standards and regulation for the provisions of community-serving retail commercial, office, and employment; a mix of these uses with multifamily attached residential (R-3); and/or multifamily/attached residential (R-3) with no commercial component. The area; these sites may be developed with community-serving commercial or up tomaximum number of residential units shall be 118 units.residential units or some mix thereof.~~

~~*McCabe Ranch II Specific Plan*~~

~~The McCabe Ranch II Specific Plan, adopted in 2010, describes development planned for a site of approximately 457 acres located near the townsite of Heber in the unincorporated county, south of the City of El Centro. The plan includes four main components: a conventional residential community, a gated residential community, a business park/commercial area, and a village commercial area. In addition, the plan calls for uses including parks, schools, and public facilities.~~

~~The plan provides for a maximum of 2,300 housing units. Housing options include attached and detached single-family homes on a variety of lot sizes, as well as multifamily units at a density of up to 24 units per acre. It is assumed that the High-Density Multifamily (718 units) is appropriate to accommodate the County's lower income RHNA based on the assumed density. Refer to Table A-32 for a summary of the unit types, densities, and total units in the specific plan area.~~

~~There are no specific timing or phasing requirements, construction will depend on market conditions and demand. The plan allows for flexibility in the specific type of housing constructed and mix of commercial uses to allow for changing demand.~~

~~Development in the McCabe Ranch II area will connect to the Heber Public Utility District. The Specific Plan anticipates upgrades and expansions to the Heber Public Utility District systems to accommodate the new development. McCabe Ranch II developers will contribute to infrastructure expansion financing.~~

~~TABLE A-32 MCCABE RANCH II SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL~~

~~Residential Type~~	~~Max. Density (units per acre)~~	~~Acres~~	~~Units~~
~~Traditional Lot, Single-Family~~	~~5~~	~~83.9~~	~~420~~
~~Small Lot, Single-Family~~	~~7~~	~~31.6~~	~~221~~
~~Flex Lot, Single-Family~~	~~9~~	~~68.6~~	~~617~~
~~High-Density Multifamily~~	~~22~~	~~26.7~~	~~587~~
~~Gated Community~~			
~~Estate Lots, Single-Family~~	~~n/a (1 SF dwelling per site, min. lot size 0.5 acre)~~	~~22.6~~	~~45~~
~~Mini-Estate Lots, Single-Family~~	~~n/a (1 SF dwelling per site, min. lot size 10,000 sf)~~	~~25.9~~	~~112~~
~~Low-Density, Single-Family~~	~~n/a (1 SF dwelling per site, min. lot size 6,000 sf)~~	~~33.4~~	~~167~~
~~High-Density Multifamily~~	~~24~~	~~8.6~~	~~131~~
~~Total~~		~~293.6~~	~~2,300~~

~~*Source: McCabe Ranch II Specific Plan, June 2010*~~

Rancho Los Lagos Specific Plan

The Rancho Los Lagos Specific Plan, adopted in 2012, provides for 3,830 housing units in a 1,076-acre mixed-use, walkable community. The plan establishes four community areas: conventional residential, active adult residential, golf course, and business park. Development timing will be based on market conditions, and each area may be developed over several phases (phases A1 – A3 and B1 – B3), with associated infrastructure and community facilities provided concurrently. Phase A1 includes 24 acres of multifamily and mixed-use land along with single family and park space. Phase A2 includes single and multifamily development along with a school and additional open space.

High Density Multifamily areas ~~will~~ can accommodate 1,016 units at densities between 12 and 24 units per acre and are appropriate to meet the County's lower income RHNA based on allowable density. Medium-Density Single-Family areas ~~will~~ can accommodate 1,501 units in duplexes and detached single-family dwellings and cluster single-family dwellings (shared driveway) on lots under 5,000 square feet. Low-Density Single-Family areas ~~will~~ can accommodate 1,313 single-family residences on lots over 5,000 square feet. The County has assumed that the 101 Ranch Specific Plan will accommodate the moderate- and above moderate- income RHNA.

The Rancho Los Lagos Plan includes provisions for 939 units in an "active adult" community that would be age restricted to residents 55 years and older. Homes at low and medium densities are planned to meet the needs of seniors at a wide range of income levels. The area would be served by a homeowner's association recreation complex as well as by community-wide parks, lakes, and a golf course.

Refer to Table A-32 for a summary of land and unit potential by residential development type.

According to the Rancho Los Lagos Environmental Impact Report, development in the Rancho Los Lagos area will connect to planned water and wastewater services facilities to be provided in the Keystone County Service Area. In the event that construction at Rancho Los Lagos commences before the service facilities are completed, the Keystone County Service Area will provide a temporary water treatment plant.

TABLE A-32 RANCHO LOS LAGOS SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Land Use	Gross Acres	Units	Gross Density (units per acre)
Low Density Residential			
7,200 S.F.	54.7	207	3.8
6,000 S.F.	62.0	293	4.7
5,000 S.F.	74.6	384	5.1
Medium Density Residential			
4,000 S.F.	67.7	426	6.3
3,500 S.F.	38.4	321	8.4
4-unit Cluster (on 12,650 S.F. 4-lot pad)	25.6	244	9.5
High Density Residential (Multi-Family)			
Condominium	19.8	356	18.0
Multi-Family Mixed Use	15.0	360	24.0
Townhomes	27.7	300	10.8
Active Adult or Gated Community Residential			
6,000 S.F. (detached)	28.2	147	5.2
5,000 S.F. (detached)	49.1	282	5.7
3,800 S.F. (attached or detached)	76.8	510	6.6

Source: Rancho Los Lagos Specific Plan, 2011

~~Development Type~~	~~Density (units per acre)~~	~~Acres~~	~~Units~~
~~Single-Family Residential~~			
~~Low-Density~~	~~n/a[1]~~	~~191~~	~~884~~
~~Medium-Density~~	~~n/a[2]~~	~~132~~	~~991~~
~~Multifamily Residential (High-Density)~~	~~12–24~~	~~63~~	~~1,016~~
~~Active Adult (or Conventional) Gated Community Residential~~			
~~Low-Density~~	~~n/a[1]~~	~~77~~	~~429~~
~~Medium-Density~~	~~n/a[2]~~	~~77~~	~~510~~

~~Total~~	~~540~~	~~3,830~~

~~*Source: Rancho Los Lagos Specific Plan, 2011*~~

~~*1. One unit per lot, minimum lot size of 5,000 square feet.*~~

~~*2. Detached single-family dwellings on lots ranging from 3,500 to 4,999 square feet; cluster detached single- family dwelling units (4 to 6 units sharing a common driveway) on lots ranging from 2,900 to 4,999 square feet; and duplex units on lots ranging from 3,200 to 4,999 square feet.*~~

McCabe Ranch II Specific Plan

The McCabe Ranch II Specific Plan, adopted in 2010, describes development planned for a site of approximately 457 acres located near the townsite of Heber in the unincorporated county, south of the City of El Centro. The plan includes four main components: a conventional residential community, a gated residential community, a business park/commercial area, and a village commercial area. In addition, the plan calls for uses including parks, schools, and public facilities.

The plan provides for a maximum of 2,300 housing units. Housing options include attached and detached single-family homes on a variety of lot sizes, as well as multifamily units at a density of up to 24 units per acre. It is assumed that the High-Density Multifamily (718 units) is appropriate to accommodate the County's lower income RHNA based on the assumed density. Refer to Table A-33 for a summary of the unit types, densities, and total units in the specific plan area.

There are no specific timing or phasing requirements, construction will depend on market conditions and demand. The plan allows for flexibility in the specific type of housing constructed and mix of commercial uses to allow for changing demand.

Development in the McCabe Ranch II area will connect to the Heber Public Utility District. The Specific Plan anticipates upgrades and expansions to the Heber Public Utility District systems to accommodate the new development. McCabe Ranch II developers will contribute to infrastructure expansion financing. The County has included program 28 to help facilitate the development of large lots

TABLE A-33 MCCABE RANCH II SPECIFIC PLAN RESIDENTIAL UNIT POTENTIAL

Residential Type	Max. Density (units per acre)	Acres	Units
Traditional Lot, Single-Family	5	83.9	420
Small Lot, Single-Family	7	31.6	221
Flex Lot, Single-Family	9	68.6	617
High-Density Multifamily	22	26.7	587
Gated Community			
Estate Lots, Single-Family	n/a (1 SF dwelling per site, min. lot size 0.5 acre)	22.6	45

Residential Type	Max. Density (units per acre)	Acres	Units
Mini-Estate Lots, Single-Family	n/a (1 SF dwelling per site, min. lot size 10,000 sf)	25.9	112
Low-Density, Single-Family	n/a (1 SF dwelling per site, min. lot size 6,000 sf)	33.4	167
High-Density Multifamily	24	8.6	131
Total		293.6	2,300

Source: McCabe Ranch II Specific Plan, June 2010

Sites Analysis Summary

Based on the land analysis, the County has sufficient land to accommodate 6th Cycle RHNA, shown in Table A-34. Moderate- and above moderate-income unit allocations are met through specific plans, and projected ADUs. Lower income unit allocations are met through vacant sites, specific plans, the Chelsea Investment Corporation projected project and through projected ADUs and manufactured homes.

As shown in Table A-34, the County has a surplus of ~~2,084~~202~~1,143~~430 lower-income units, ~~4,592~~1,~~493~~1,099 moderate-income units, and ~~3,039~~638~~92~~1,525 above moderate-income units. The available capacity ~~far~~ exceeds the County's RHNA.

TABLE A-34
2021-2029 RHNA ANALYSIS

Income Group	2021-2029 RHNA	Specific Plan Capacity	Vacant Site Capacity	Pending Project	Projected ADUs	Projected Manufactured Homes	Unit Surplus
Very Low	1,203	~~0~~287	2,444 ~~3,375~~1,502	320	~~28~~18	160	1,~~143~~430 ~~2,084~~202
Low	596						
Moderate	580	1,562	106 ~~2,062~~5,155	-	~~17~~11		1,099 ~~1,493~~4,592
Above Moderate	1,922	~~2,812~~3,445	~~4,957~~1,983	-	4~~2~~		~~892~~1,525 ~~633~~,039
Total	4,301	5,293~~4,373~~	2,550 ~~5,547~~13,487	320	~~48~~32	~~315~~160	~~3,134~~4,054 ~~1,758~~9,714

Source: SCAG 6th Cycle Final RHNA Allocation Plan, March 2021; Imperial County Planning & Development Services, 2021

Environmental Constraints and Infrastructure

Though fault lines and floodplains are present in the Imperial Valley, the ample availability of land in the county allowed for the identification of potential sites that are not subject to environmental factors that

would present a constraint to housing development. All sites listed in the inventory are within the Heber Public Utilities District (HPUD) or have identified adequate infrastructure improvements and financing as part of a Specific Plan. Additionally, the County has included Program 2 to assist with Infrastructure Availability and Coordination —to work with community service districts to identify and overcome constraints to providing water and sewer service for housing, prioritizing improvements for lower-income housing and in low-resource areas to further place-based revitalization efforts.

Housing Constraints

The availability, cost, and quality of housing are influenced by factors including economic and housing market conditions, the availability of financing, governmental practices and processes, and public and private attitudes toward housing for local residents. This chapter addresses potential governmental, non-governmental, and infrastructure constraints to affordable housing development, as well as opportunities for energy conservation.

Non-Governmental Constraints

Construction Costs

Construction costs vary widely based on the type of development, with multifamily housing generally less expensive to construct than single-family homes on a per-unit basis. Variables such as unit size and the number and quality of amenities, such as fireplaces, swimming pools, and interior fixtures create wide cost variations within each construction type.

In addition to construction costs, the price of land is one of the primary components of housing development costs. Land costs vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (e.g., steep slopes, soil stability, seismic hazards, or flooding) can impact the cost of land. Other costs may stem from professional services such as land surveying and engineering, soils engineering/analysis, site design, landscape and architectural design, and permit processing.

According to construction cost data provided by the Craftsman Book Company, a wood-framed single-story four-cornered home in Imperial County is estimated to cost approximately $262,787 to build, excluding the cost of buying land. This cost estimate is based on a 2,000-square-foot house of good quality construction including a two-car garage and forced air heating and cooling. Table A-35 summarizes the projected construction costs.

If labor or material costs increase, the cost of construction in Imperial County could rise to a level that impacts the price of new construction and rehabilitation. Therefore, increased construction costs have the potential to constrain new housing construction and the rehabilitation of existing housing. The County will do its part in reducing development processing times and providing a more streamlined review process by continuing to implement Program ~~27~~ 28 described in the Goals, Policies, and Programs section.

TABLE A-35
CONSTRUCTION COSTS

Item Name	Materials	Labor	Equipment	Total
Direct Job Costs (e.g., foundation, plumbing, materials)	$112,203	$96,980	$5,109	$214,292
Indirect Job Costs (e.g., insurance, plans and specifications)	$16,844	$1,650	-	$18,494
Contractor Markup	$30,001	-	-	$30,001
Total Cost	$159,048	$98,630	$5,109	$262,787

Source: Building-Cost.net, accessed February 2021

Land Costs

Land costs are one of the major components of housing development costs. Land prices vary to such an extent that it is difficult to give average prices, even within small geographic regions. Factors affecting the costs of land include overall availability within a given subregion; environmental site conditions and constraints; public service and infrastructure availability; aesthetic considerations, such as views, terrain, and vegetation; the proximity to urban areas; and parcel size. Generally, more remote areas have less expensive land available and in larger tracts. Smaller and more expensive parcels are closer to urbanized areas.

Land costs in the unincorporated county typically reflect their location within the county, availability or presence of infrastructure, and are similar to incorporated jurisdictions nearby. Table A-36 shows average land costs in unincorporated communities of Imperial County where land is listed for sale as of May 2021. Residential land prices of all sites surveyed ranged from $792 per acre for a site in Palo Verde to $207,143 per acre for a site in Salton City.

TABLE A-36
LAND COSTS, UNINCORPORATED COUNTY

Community	Average Price per Acre	Number of Sites Surveyed
Bombay Beach	$20,818	4
Desert Shores	$86,733	5
Heber	$19,990	1
Niland	$2,642	12
Ocotillo	$1,256	2
Palo Verde	$1,979	5
Salton City	$59,894	53
Salton Sea Beach	$6,231	3

Community	Average Price per Acre	Number of Sites Surveyed
Seeley	$65,127	3
Winterhaven	$6,179	7

Source: Landwatch.com, May 2021

Availability of Financing

The cost of borrowing money to finance the construction of housing or to purchase a unit affects the availability and affordability of housing in Imperial County. Fluctuating interest rates can eliminate many potential homebuyers from the housing market or render a housing project that could have been developed at lower interest rates infeasible. When interest rates decline, sales increase. The reverse has been true when interest rates increase. The recent economic downturn had a significant impact on the housing market and housing financing. In the years following the downturn, financing has become more difficult to obtain, especially for low- and middle-income households. This could be a constraint to homeownership for lower-income families. At the same time, post-economic downturn interest rates have been historically low. These historically low rates could provide opportunity for low- and middle-income families to experience homeownership.

The fixed interest rate mortgage remains the preferred type of loan, especially during the periods of low, stable interest rates that are currently occurring. Table A-37 illustrates interest rates as of February 2021. The table presents both the interest rate and the annual percentage rate (APR) for different types of home loans. The interest rate is the percentage of an amount of money that is paid for its use for a specified time, and the APR is the yearly percentage rate that expresses the total finance charge on a loan over its entire term. The APR includes the interest rate, fees, points, and mortgage insurance and is therefore a more complete measure of a loan's cost than the interest rate alone. However, the loan's interest rate, not its APR, is used to calculate the monthly principal and interest payment.

TABLE A-37
INTEREST RATES

Loan Type	Interest	APR
30-year fixed	3.00%	3.09%
30-year fixed Veterans Administration	2.75%	3.00%
20-year fixed	2.75%	2.88%
15-year fixed	2.25%	2.43%
7/6-Month Adjustable-Rate Mortgage (ARM)	2.13%	2.57%
5/6-Month ARM	2.00%	2.58%
Jumbo		

Loan Type	Interest	APR
30-year fixed	3.00%	3.05%
15-year fixed	2.75%	2.87%
7/6-month ARM	2.50%	2.68%
10/6-month ARM	2.63%	2.73%

Source: wellsfargo.com, February 2021

The availability of financing also 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 by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with government assistance.

Table A-38 summarizes the disposition of loan applications submitted to financial institutions for home purchase, refinance, and home improvement loans in Imperial County in 2019. Included is information on loan applications that were approved and originated, approved but not accepted by the applicant, denied, withdrawn by the applicant, or incomplete. An originated application is one that is approved by the lender and accepted by the applicant.

TABLE A-38
HOME MORTGAGE ORIGINATIONS, EL CENTRO MSA, 2019

Disposition	Home Purchase				Refinance		Home Improvement	
	Government-Backed		Conventional					
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Approved, Originated	713	77.7%	921	70.6%	1,320	52.4%	54	26.1%
Approved, Not Accepted	20	2.2%	49	3.8%	65	2.6%	3	1.4%
Denied	81	8.8%	124	9.5%	420	16.7%	105	50.7%
Withdrawn	85	9.3%	175	13.4%	503	20.0%	31	15.0%
Incomplete	19	2.1%	36	2.8%	211	8.4%	14	6.8%
Total	**918**	**100.0%**	**1,305**	**100.0%**	**2,519**	**100.0%**	**207**	**100.0%**

Source: Home Mortgage Disclosure Act (HMDA) data, accessed April 2021

Energy Conservation

Although the County of Imperial implements various housing programs, affordable housing is not less expensive to live in merely because the development costs are minimized. Ongoing expenses related to housing are also a factor of affordability.

The cost of housing includes not only the rent, but also utility costs. Higher utility expenses reduce affordability. Building "affordable" homes is not the same as making homes affordable to live in. Cheaply built homes invite callbacks, complaints, and discomfort and waste energy. Therefore, additional first costs to improve energy efficiency do not make housing less affordable in the long run. Energy efficiency in affordable housing, more than any other building sector, makes a critical impact on the lives of tenants. According to United States Department of Housing and Urban Development (HUD), "utility bills burden the poor and can cause homelessness." The County supports energy conservation in new and existing housing through application of California residential building standards that establish energy performance criteria for new residential buildings (Title 24 of the California Administrative Code) and through appropriate land use policies and development standards that reduce energy consumption.

Southern California Edison and Imperial Irrigation District offer a variety of energy conservation services and participate in energy assistance programs for lower-income households. Southern California Edison offers several programs for energy efficiency, including the Home Energy Efficiency Rebate (HEER) Program, Comprehensive Manufactured Homes Program (CMHP), and the Multifamily Energy Efficiency Rebate Program. Imperial Irrigation District offers a refrigerator recycling program and an Energy Rewards Program. A full list of the energy conservation and assistance programs available to residents of Imperial County can be found in Table A-39.

TABLE A-39
ENERGY CONSERVATION PROGRAMS

Program	Provider	Summary
Energy Rewards Program	Imperial Irrigation District	Offers rebates for energy efficiency measures to increase efficiency while reducing cost. Rebates can be applied to energy-efficient refrigerators, clothes washers, shade screens, attic insulation, and more.
Refrigerator Recycling Program	Imperial Irrigation District	Pays participants $50 to have Imperial Irrigation District haul away old refrigerators and freezers for responsible disposal.
Home Energy Efficiency Rebate (HEER) Program	Southern California Edison	Offers rebates on heat pump water heaters, power stations, smart thermostats, and electric vehicles to improve energy efficiency.
Residential Energy Efficiency Loan (REEL) Program	Southern California Edison	Provides financing to owners and tenants of single-family and other low-density homes for energy-efficiency upgrades
Energy Savings Assistance (ESA)	Southern California Edison	Covers the costs of purchasing and installing energy-efficient appliances for low-income customers.
Comprehensive Manufactured Homes Program (CMHP)	Southern California Edison and Synergy Companies	Provides energy-efficient products, such as light fixtures and low-flow showerheads for mobile and manufactured homeowners.
Multifamily Energy Efficiency Rebate Program	Southern California Edison	Provides rebates to increase multifamily complexes energy efficiency and is available to senior housing, single-room occupancy units, condominiums, mobile home parks, and single-family Homeowner Association (HOA) communities in addition to multifamily complexes with two or more dwellings.
Affordable Multifamily Financing (AMF) Program	Southern California Edison	Offers financing for energy-efficiency upgrades for deed-restricted multifamily properties.

Source: Southern California Edison 2021; Imperial Irrigation District 2021

Infrastructure

Dry Utilities

Electricity is available for most areas of the county through the Imperial Irrigation District or Southern California Edison.

Dry utilities, including electricity and telephone service, are available to all populated areas within the county. The extension of power and gas to service new residential development has not been identified as a constraint. Service providers are as follows:

- Electricity: Imperial Irrigation District, Southern California Edison
- Telephone: AT&T
- Internet: AT&T, Spectrum, Time Warner

Water and Wastewater

In the unincorporated areas of the county, water and sewer services are generally limited to parcels within or immediately adjacent to established communities or incorporated cities. Modest residential development can usually be accommodated, but larger subdivisions generally require costly facility expansions. Financing for expansions is available from state and federal sources but may take several years to obtain. Those communities that have recently been expanded, including Heber, have the most potential for short-term growth.

Residential developments that are built adjacent to cities and plan to "plug into" their service systems are subject to available capacities and Local Agency Formation Commission (LAFCo) regulations. Although local cities are under no obligation to provide services, in the past they have typically allowed the connection via an extension of city services or assisted in the annexation of the proposed development. Both approaches are subject to LAFCo regulations.

Outside established communities, where urban services cannot be extended or an individual water well cannot be provided, water is available through a canal system for uses other than drinking and through commercial drinking water companies. Sewage is treated by individual septic systems. Larger developments may require state-approved sewer or water treatment systems or may have to connect to special districts. All sites identified to meet the County's Regional Housing Needs Allocation (RHNA) are located in either the Heber Public Utilities District (HPUD) or have planned infrastructure expansions through the Specific Plan development process.

HPUD owns, operates, and maintains a wastewater treatment system that serves the Heber community and surrounding areas. The treatment plant was rehabilitated and expanded in 2013 to increase capacity to 1.2 million gallons per day but is currently operating at 50 percent capacity with approximately 1,600 active connections resulting in an average daily flow of 5 million gallons. As a result, there are approximately 1,600 available sewer service connections. HPUD also operates a water treatment system to provide water to the

community of Heber as well as the McCabe Cove and Magnolia Gate communities within the City of El Centro's Sphere of Influence. The water treatment plant was expanded in 2017 to increase capacity to 4 million gallons per day and distributes water to 1,632 service connections, using approximately 50 percent of its current capacity. There are approximately 1,600 water service connections available. HPUD has sufficient capacity to accommodate the water and wastewater needs of projected development during the planning period within its service area.

The 101 Ranch~~, McCabe Ranch II,~~ and Rancho Los Lagos specific plans each address infrastructure improvements and expansions needed to meet the demand of final build-out of each project. The McCabe Ranch II Specific Plan ~~is~~ and Heber sites are located within HPUD's service area and demand for these units ~~his plan area~~ will be met by the capacity expansions that were completed in 2013 (wastewater) and 2017 (water); the specific plan includes adding water lines as an early stage of development. The 101 Rancho and Rancho Los Lagos specific plans ~~identify the developer's responsibility to provide sufficient infrastructure to meet the needs of the plan area.~~each commit to construction adequate public facilities and infrastructure to serve the project and meet public need prior to each phase of development. The sites identified in Salton City and Vista Del Mar are served by the Coachella Valley Water District (CVWD) for water; sewer service for Salton City is provided by Salton Community Services District and Vista Del Mar primarily by private septic systems. In 2015 the County estimated, based on past trends, that approximately 75 to 100 new private septic systems would be constructed annually to support new development. Based on conversation with the Salton Sea ~~The Salton~~ Community Service District, there are no capacity issues and there is ~~has~~ sufficient capacity to serve anticipated construction of 2500 units in Salton Sea. ~~While CVWD reports that existing capacity for new residential units is limited,~~ Additionally, developers have reported interest to the County to fund expansion of necessary water infrastructure to support residential projects in Salton City to meet the demand for housing. (Refer to program 2).

Table A-40 lists the water districts that provide service to the townsites in the unincorporated areas of Imperial County. In accordance with Senate Bill (SB) 1087, the adopted Housing Element will be forwarded to all water and sewer providers serving Imperial County. ~~The McCabe Ranch II Specific Plan is located within HPUD, where there are approximately 1,600 available water connections and 1,600 available sewer connections.~~ Developers of the 101 Ranch and Rancho Los Lagos specific plans will finance and construct additional infrastructure capacity as needed for water and sewer service prior to construction of residential units.~~sufficient capacity to meet the assumed unit count~~ These expansions are done as needed to meet new demand, paid for by developer fees for regional improvements that both specific plans commit to participating in.

TABLE A-40

IMPERIAL COUNTY WATER DISTRICTS (UNINCORPORATED COUNTY)

Townsite	Water District
Bombay Beach	Coachella Valley Water District
Desert Shores	Coachella Valley Water District
Heber	Heber Public Utilities District

Townsite	Water District
Niland	Golden State Water Company
Ocotillo/Nomirage	Coyote Valley Mutual Water Company, Ocotillo Valley Mutual Water Company
Palo Verde	Palo Verde County Water District
Salton City	Coachella Valley Water District
Salton Sea Beach	Coachella Valley Water District
Seeley	Seeley County Water District
Winterhaven	Winterhaven County Water District

Source: Imperial County Planning Department 2021

Governmental Constraints

Local policies and regulations can impact the price and availability of housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and various other issues can constrain the development and improvement of housing.

Land Use Controls

The Imperial County General Plan establishes policies that guide residential development. These policies, along with zoning regulations, control the amount and distribution of land allocated for a wide variety of uses in the county. Housing supply and costs are affected by the amount of land designated for residential use, the density at which residential development is permitted, and the standards that govern the character of development. Refer to Table A-41 for a description of Imperial County General Plan land use classifications that allow for residential development. Most opportunities for new residential development are located in areas in the Urban Area and Specific Plan classifications.

Policies set forth in the General Plan are implemented by the development regulations in Title 9, the Land Use Ordinance for Imperial County, as well as in adopted Specific Plans.

TABLE A-41
GENERAL PLAN LAND USE DESIGNATIONS

Designation	Intent
Agriculture	Preserve lands for agricultural production and related industries, including aquaculture, ranging from light to heavy agriculture. Where this designation is applied, agriculture shall be promoted as the principal and dominant use to which all others shall be subordinate. Allows very low-density residential uses with not more than one single family dwelling per 40 acres or per legal parcel.

Designation	Intent
Community Area	Land uses associated with the unincorporated communities of Hot Mineral Spa/Bombay Beach, Ocotillo/Nomirage, and Palo Verde. Primarily low-density accessory dwelling units and retirement dwellings and recreational services. Higher densities may be allowed pursuant to an approved Master Plan for the overall Community Area where adequate public infrastructure exists.
Industry	Heavy manufacturing land uses located away from conflicting existing or planned land uses. Residential land uses are limited to one single-family dwelling unit if appurtenant to a permitted industrial or commercial use and occupied by a caretaker, custodian, or night watchman with a conditional-use permit.
Recreation/ Open Space	The maximum allowed residential density of one residence per acre. Greater densities may be permitted by a Specific Plan encompassing at least 160 acres for appropriate recreation-oriented residential development.
Specific Plan	Application of the Specific Plan designation shall be accompanied by adoption of objectives and policies for the design, development, and use of such areas. This may include residential, commercial, industrial, agricultural, recreational, open space, and public uses.
Urban Area	Includes areas surrounding the seven incorporated cities and the unincorporated communities of Niland, Heber, Seeley, Winterhaven, and West Shores/Salton City, Bombay Beach and Palo Verde. These areas are characterized by a full level of urban services, including public water and sewer systems. Residential building intensity is determined by available public facilities and services and physical or environmental factors that may affect the site.

Source: Imperial County Land Use Element, 2015

Residential Development Standards

Zoning regulations are designed to protect and promote the health, safety, and general welfare of residents as well as to implement the policies of the General Plan. Title 9, the County's Land Use Ordinance, also serves to preserve the character and integrity of existing neighborhoods. Residential uses are allowed in a variety of zones, including agriculture, residential, commercial, and open space. Table A-42 shows specific zones that permit residential uses as well as allowed densities and development standards.

TABLE A-42
LAND USE ZONES AND DEVELOPMENT STANDARDS

Zone	Max. Units Per Acre	Min. Lot Area/ Dwelling Unit	Setback[1]			Building Height
			Front Yard	Side Yard*	Rear Yard	
Limited Agriculture (A-1)	2	0.5 acres; 1 acre minimum if an OWTS will be used.	25	5	5[2]	40 feet (ft) or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 30 ft
General Agricultural Rural (A-2)	up to two (2) residences per legal parcel. The ADU subject to a CUP	40 acre minimum. 1 acre per dwelling unit (for 1st unit) except with a CUP, which shall be a minimum of 30,000 square feet (sf) for additional unit. When an OWTS is proposed, the minimum area is 2.5 acres	30	5	10	40 ft or 3 stories, whichever is less
Heavy Agriculture (A-3)	One residence per legal parcel	40 acres gross	30	10	10	
Low-Density Residential (R-1)	5 per acre (net)	6,000 sf/4,500 sf/unit	25**	5	25**	40 ft or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 25 ft
Medium-Density Residential (R-2)	10	6,000 sf minimum for the first unit. And 3,000 sf[2] for lots after	25	5	25	40 ft or 3 stories, whichever is less; detached accessory structures shall not exceed 2 stories or 25 ft

Zone	Max. Units Per Acre	Min. Lot Area/ Dwelling Unit	Setback[1]			Building Height
			Front Yard	Side Yard*	Rear Yard	
Medium-/High-Density Residential (R-3)	29	2,000 sf[3] provided that the basic lot minimum is 6,000 sq ft for the first unit	20	5	15	80 ft or 6 stories; detached accessory structures shall not exceed 2 stories or 25 ft
High-Density Residential & Mobile Home Park/ Subdivision (R-4)	7	6,000 sf except lots within a designated mobile home park zone (1 dwelling unit per legal lot in R-4 zone)	20	5/10[3]	15	30 ft or 2 stories, whichever is less
Light Commercial (C-1)	1 unit subject to Division 4 ADU	1,500 sq ft of lot area per dwelling unit in addition to the minimum lot size (8,000 sq ft)	20	5	15	50 ft or 5 stories, whichever is less
Open Space/ Recreational (S-1)	One residence per legal parcel and one subject to a CUP but will change to reflect current state law (by right)	1 acre	25	10	10	35 ft
Open Space/ Preservation (S-2)	One residence per legal parcel	20 acres net; 1 acre of lot/dwelling unit	30	20	20	40 ft

Source: Imperial County Land Use Ordinance Title 9, 2019

Note: There are no lot coverage restrictions on residential uses beyond compliance with setbacks and accommodating septic systems.

1. *Reports the most restrictive standards for a common lot. For a full listing of additional setback options and requirements, see Imperial County Land Use Ordinance, Title 9.*
2. *Except in the case of through lots, where the designated rear yard shall be equal to the front yard setback.*
3. *No lot in an R-2 zone shall be less than 6,000 square feet and shall provide a minimum of 3,000 square feet/dwelling for multiple dwellings.*
4. *No lot in an R-3 zone shall be less than 6,000 square feet and shall provide a minimum of 2,000 square feet/dwelling for multiple dwellings.*

**Except on a corner lot, which may require 15-to-30-foot setback distances.*

***See options pursuant to section 90502.06*

Typical Densities for Development

The typical built densities for past residential projects in the county have ranged from 1 to 14.5 dwelling units per acre, because typical development has been single-family residential with one dwelling unit per legal parcel based on the zone district. Recently the county received a proposal that reflects a significantly higher density than usual. The Heber del Sol Family Apartments is a 100 percent affordable housing project with 47 units located in the R-3 zone in the Heber community. This multi-family project is proposed at 104 percent of the allowable density on this site and received parking waivers from the County, indicating the County's commitment to approving affordable housing in unincorporated communities.

The typical density for recent single-family development in the county is 4 to 8 dwelling units per acre, with an average of 5 dwelling units per acre. The Heber del Sol project is the only recent multifamily project proposed in unincorporated Imperial County but will be developed at approximately 29 units per acre. Projects that propose a density lower than the minimum density require a General Plan Amendment and a rezone, with no guarantee that one or both will be approved. The county did not receive any requests to approve a project listed on the sites inventory table at a lower than the required density during the 5th cycle planning period. If a request were made for approval of a project that was lower than the required density, it is important to note that the Planning Department would require an appropriate land use designation to match the proposed density. A general plan amendment would be required in this circumstance.

Parking Requirements

Parking standards for single-family homes, duplexes, condominiums, and mobile or manufactured homes require a minimum of two parking spaces per unit and an additional half space for each additional bedroom in excess of three bedrooms. In addition, multifamily developments and mobile home parks are required to provide one guest space for every five units in the project. The parking requirement for accessory dwelling units with zero or one bedroom is one parking space. Accessory dwelling units with two or more bedrooms are subject to the same parking requirements as single-family dwelling units. The County has included Program ~~7~~ 8 to amend Title 9 of the Land Use Ordinance to allow ADUs in compliance with Government Code Section 65852.2. Refer to Table A-43 for parking requirements by zone.

Parking requirements for single- and multifamily units do not present a constraint for development in Imperial County. Requirements for multifamily development are less than those for single-family residences.

In addition, the County adheres to the state density bonus law, which allows developers to opt for less parking requirements as an incentive for building a certain percentage of affordable units.

TABLE A-43
RESIDENTIAL PARKING REQUIREMENTS

Type of Residential Development[1]	Required Parking Spaces	Comments
Low-Density Residential	2 spaces/unit; plus 0.5 for each additional bedroom	Single-family dwelling, a duplex dwelling, a condominium, or a mobile home (manufactured) unit
Medium- to High-Density	Same requirement as low-density residential; plus 1 guest space for every 5 units	Multifamily projects (all unit sizes[2])
High-Density Residential & Mobile Home Park	Same requirement as medium density; plus 1 guest space for every 5 mobile homes	2 spaces per mobile home
Accessory Dwelling Unit Zero to 1 bedroom 2+ bedrooms	1 space/unit Same requirement as low density residential	Parking may be provided as tandem parking, on an existing driveway.

Source: Imperial County Land Use Ordinance, Division 4

Notes:

1. *The County has included* ***Program 8*** ~~7~~ *to amend the Land Use Ordinance to allow sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii)).*
2. *The County will review parking requirements for smaller multifamily units, including studios and one-bedrooms, to determine if current requirements constrain development of units of this size. Based on findings, the County will revise Division 4 as necessary (**Program 8**).*

Density Bonus

Under current state law (California Government Code Section 65915), cities and counties must provide a density increase of up to 80 percent over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with 100 percent of units affordable to low- or very low-income households. The County of Imperial allows a density bonus of 20 percent for residential projects with 50 or more units in the medium-density residential (R-2) zone, high-density residential (R-3) zone, or the mobile home park (R-4) zone if the project provides full-time on-site daycare facilities. A 20-percent density bonus is allowed for residential projects of 20 or more units in the low-density residential (R-1), R-2, R-3, or R-4 zones, if the project provides complete public infrastructure improvements. A density bonus of 20 percent is allowed for any residential project or condominium conversion containing 10 or more units in the R-1, R-2, R-3, or R-4 zones if 30 percent of the units are affordable to lower moderate-

income families. The County has included Program ~~6~~ 7 to comply with current density bonus law, as defined in California Government Code Section 65915.

Provision for a Variety of Housing

The Housing Element must identify housing opportunities at a range of types and sizes to ensure that options are available to meet the needs of all segments of the population. The Imperial County Land Use Ordinance provides for a variety of housing types, including single-family dwellings, duplexes, guest dwellings, mobile homes, group residential homes, multiple-unit dwellings, convalescent homes, accessory structures, supportive housing, and single-room occupancy units (SROs). Table A-44 summarizes the housing types permitted and conditionally permitted by zone.

TABLE A-44
HOUSING TYPES PERMITTED BY ZONING DISTRICT

Residential Uses	R-1	R-2	R-3	R-4	C-1	C-2	C-3	A-1	A-2	A-3	AM-1	AM-2	S-1	S-2
Single-Family Dwelling	P	P						P	P	P	P	P	P	P
Apartment		P	P	P	C									
Condominium		P	P	P	C									
Duplex		P	P	P										
Townhouse			P	P										
Quadruplex			P	P										
Guest House	P													
Accessory Dwelling Unit [1]	P	P			P	P	P	P	C	C	P	P	C	
Mobile/Manufactured Home [2]	P	P		P				P						C
Mobile Home Park					C								P	
Community Care Facility		C	C	C	C	C		C						
Residential Care Facilities (serving 5 or less persons)[3]	P	P	P	P					P					
Residential Care Facilities (serving 6 or fewer persons) [3]								P						
Residential Care Facility (serving more than 5 persons) [3]	C	C												
Convalescent Hospital/Home	C				C	P	P							
Retirement or Rest Home	C	C	C	C	C			C		C				

Residential Uses	R-1	R-2	R-3	R-4	C-1	C-2	C-3	A-1	A-2	A-3	AM-1	AM-2	S-1	S-2
Senior Citizen Complex	C							C						
Boarding or Rooming House			P	P	P	P	P	P						
SRO			P	P	P	P	P	P						
Emergency Shelters [4]						P	P	C						
Farm Labor/Employee Housing [5]								P	C	P/C	C	P		
Transitional Housing [6]			P	P		P	P	P						
Supportive Housing [6]			P	P										

Source: Imperial County Land Use Ordinance (Title 9)

P= Permitted, C = Conditional-Use Permit

*1. The County has included **Program ~~7~~ 8** to amend the Land Use Ordinance to allow Accessory Dwelling Units (ADUs) in all residential and non-residential zones that permit single-family or multifamily uses, in accordance with California Government Code Section 65852.150.*

*2. The County will amend the Land Use Ordinance to allow and permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings in compliance with California Government Code Section 65852.3(a) (**Program ~~7~~8**).*

*3. The County will amend the Land Use Ordinance to allow residential care facilities for 6 or fewer persons in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for 7 or more persons in the same manner in accordance with the State's definition of family (**Program ~~15~~16**).*

*4. Emergency shelters are also permitted by right in the M-1 zone. The County will amend the Land Use Ordinance to allow low-barrier navigation centers for the homeless by-right in zones that allow for mixed-use and non-residential zones permitting multifamily uses, per California Government Code Section 65662 (**Program ~~15~~16**).*

*5. The County has included **Program ~~7~~ 8** to amend the Land Use Ordinance to treat employee/farm labor housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Additionally, the County will amend the Land Use Ordinance to treat employee/farm labor housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with the California Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6).*

*6. Transitional housing is also a permitted use in the M-1 zone. The County will amend the Land Use Ordinance to allow transitional and supportive housing as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone and to allow supportive housing as a permitted use without discretionary review in zones where multifamily and mixed-use developments are permitted, including non-residential zones permitting multifamily uses, in compliance with California Government Code Section 65583(c)(3) (**Program ~~15~~16**).*

Housing for Persons with Disabilities

According to state law (California Government Code Section 65583 (a)(4)), the Housing Element must analyze constraints upon the development, maintenance, and improvement of housing for persons with disabilities. Health and Safety Code Section 1568.0831 requires residential care facilities for six or fewer persons be considered a residential use of property and be permitted in the same manner as other single-family structures of the same type within the same zone. Additionally, State law defines a family as "one or more persons living together in a dwelling unit," which, under fair housing law, means that residential care facilities for seven or more persons must be treated as a residential use and a jurisdiction cannot regulate how many unrelated persons live together.

Current permitting requirements for residential care facilities act as a constraint to the development of housing for persons with disabilities by limiting where they may be developed in unincorporated areas of Imperial County. Residential care facilities for less than five people are permitted by-right in the following zones: A-2, R-1, R-2, R-3, and R-4. Residential care facilities with more than five people are conditionally permitted in the R-1 and R-2 zones. Additionally, the A-1 zone allows residential care facilities serving six or less people. The County has included Program ~~15~~ 16 to amend the Land Use Ordinance to allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Section 1568.0831 and residential care facilities for seven or more persons with a valid license issued by the California Department of Social Services (CDSS) in the same manner in accordance with the State's definition of family.

Reasonable Accommodations

California Government Code Section 65583 requires that the Housing Element analyze potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities and demonstrate local efforts to remove governmental constraints that hinder the locality from meeting the need for housing for persons with disabilities (California Government Code Section 65583(a)(4)). As part of the required constraints program, the element must include programs that remove constraints or provide reasonable accommodations for housing designed for persons with disabilities (California Government Code Section 65583(c)(3)).

The County's reasonable accommodation procedures are included in the Title 9 Land Use Ordinance, Division 3, Chapter 7. Chapter 7 describes procedures to facilitate requests for variations in the enforcement of development standards to accommodate special requirements resulting from a disability. In compliance with SB 520, a complete evaluation of the County's zoning laws, practices, and policies was done as part of the Housing Element update process.

- Reasonable accommodations - In 2013, the County amended Ordinance 1487 to provide a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. ~~The findings to approve, deny, or approve with conditions a reasonable accommodation request are as follows~~The County has included Program ~~16~~7 to review and update the findings for a reasonable

accommodation request to comply with State law. The existing findings to approve, deny, or approve with conditions a reasonable accommodation request are as follows:~~:~~

- Whether the housing in the request will be used by an individual considered disabled under the acts.
- Whether the request for reasonable accommodation is necessary to make specific housing available to an individual considered disabled under the acts.
- Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the county.
- Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a county program or law, including but not limited to, land use and zoning.
- Potential impact on surrounding uses.
- Physical attributes of the property and structures.
- Other reasonable accommodations that may provide an equivalent level of benefit.

- Separation requirements - The County's Land Use Ordinance does not impose any separation requirements between supportive housing or residential care facilities.
- Site planning requirements - The site planning requirements for group homes and residential care facilities are no different than for other residential uses in the same zone.
- Definition of family - To ensure the County does not have any practices that could discriminate against persons with disabilities and impede the availability of such housing for these individuals, the County has included Program ~~15~~ 16 to include a definition of family that does not limit family by size or relation.

Emergency Shelters

The California Health and Safety Code (Section 50801) defines an emergency shelter as "housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay."

California Government Code Section 65583(a)(4)(A) requires jurisdictions to allow emergency shelters in at least one zone with adequate vacant land without a conditional-use permit. The Imperial County Land Use Ordinance allows emergency shelters by-right in the C-2 (General Commercial) and M-1 (Light Industrial) zones. Emergency shelters with a conditional use permit are allowed in the A-1 zone. Much of the vacant land in these zones is located near existing urban areas and incorporated cities, where transportation and other services could reasonably be expected to be extended in the future. There are approximately 3,000 vacant acres of General Commercial (C-2), Light Industrial (M-1), and Medium Industrial (M-2) zoned land across unincorporated areas of the County.

Vacant sites in the M-1, M-2, and C-2 zones are at a wide range of sizes, suitable to accommodate shelters of various sizes. Within the M-1 and C-2 zones, there are over 1,000 vacant parcels under 1 acre, 96 that are from 1 to 5 acres, 9 that are 5 to 10 acres, and 11 that are 20 acres or more.

Transitional and Supportive Housing

Transitional housing is defined in Section 50675.2 of the Health and Safety Code as rental housing for stays of at least six months but where the units are recirculated to another program recipient after a set period. It may be designated for a homeless individual or family transitioning to permanent housing. This housing can take many structural forms, such as group housing and multifamily units and may include supportive services to allow individuals to gain necessary life skills in support of independent living. California Government Code Section 65583(c)(3) requires that jurisdictions consider transitional housing a residential use and only require the same restrictions as those applied to other residential dwellings of the same type in the same zone.

Supportive housing is defined by Section 50675.14 of the Health and Safety Code as housing with linked on-site or off-site services with no limit on the length of stay and occupied by a target population, as defined in Health and Safety Code Section 53260 (i.e., low-income person with mental disabilities, AIDS, substance abuse or chronic health conditions, or persons whose disabilities originated before the age of 18). Services linked to supportive housing usually focus on retaining housing, living and working in the community, and/or health improvement. State law (California Government Code Section 65583(c)(3)) requires supportive housing be "considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone;" additionally, supportive housing must be permitted by-right in all residential and non-residential zones where multifamily and mixed-uses are permitted.

Transitional housing is currently permitted without a conditional-use permit in zones R-3, R-4, C-2, and A-1 and supportive housing is permitted without a conditional-use permit in zones R-3 and R-4. The County has included Program ~~15~~ 16 to amend the Land Use Ordinance to treat transitional and supportive housing as a residential use type and subject only to the same regulations as any other use in the same zoning district. Additionally, the County will amend the Land Use Ordinance to allow supportive housing in any zone district that allows multifamily, in compliance with Government Code Section 65650.

Extremely Low-Income Households

Extremely low-income households typically comprise persons with special housing needs, including, but not limited to, persons experiencing homelessness or at risk of homelessness, persons with substance abuse problems, and farmworkers. AB 2634 (Lieber 2006) requires the quantification and analysis of existing and projected housing needs of extremely low-income households. Housing Elements must also identify zoning to encourage and facilitate supportive housing and single-room occupancy units.

The County has identified single-room occupancy units (SROs) and boarding or rooming houses as units that can serve as an affordable housing option for lower-income households and those with special housing

needs, including persons who are homeless or near-homeless, persons with substance abuse problems, and farmworkers. The County defines SROs as "a single room that is the primary residence of its occupant. The unit may contain food preparation or sanitary facilities" allows them as a permitted use (without a conditional-use permit) in the R-3, R-4, A-1, C-1, and C-2 zones, in compliance with Government Code Section 65583.

Accessory Dwelling Units

Accessory Dwelling Units (ADU) provide opportunities for affordable units. Government Code Section 65852.2 requires that ADUs be permitted ministerially in any residential zone or non-residential zone that permits residential uses. In Imperial County, ADUs are currently permitted by-right in the R-1, R-2, C-1, A-1, AM-1, and AM-2 zone districts. ADUs are conditionally permitted in the A-2, A-3, and S-1 zone districts. ADUs offer an opportunity for homeowners to earn additional income and provide an opportunity for affordable housing units. Section 90405.08 of Title 9, Division 4 of the County's Land Use Ordinance, property owners must submit a signed affidavit that they currently reside on the property on which an ADU is proposed and will continue to occupy either the primary or accessory dwelling unit.

The County has included Program ~~7~~ 8 to allow ADUs in all residential and non-residential zones that permit residential uses, in compliance with Government Code Section 65852.

Manufactured Housing and Mobile Homes

Under California Government Code Section 65852.3(a) jurisdictions must allow certified manufactured homes on all lots zoned for conventional, stick-built single-family dwellings. The only difference in regulation between manufactured homes and conventional single-family dwellings may be with respect to architectural requirements. The Imperial County Land Use Ordinance currently allows manufactured homes as a permitted use in the R-1, R-2, R-4, and A-1 zone districts. To remove barriers to the development of a potential affordable housing option, the County will amend the Land Use Ordinance to allow and permit manufactured housing in the same manner and same zone as conventional single-family residential dwellings, in compliance with State law (Program ~~7~~8).

Farmworker Housing

Under State law, jurisdictions must treat employee housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Additionally, employee housing consisting of no more than 12 units or 36 beds treated as an agricultural use must be permitted in the same manner as other agricultural uses in the same zone.

The Imperial Valley Housing Authority provides housing for permanent farmworkers that is regulated through the United States Department of Agriculture's (USDA's) Rural Development office. The County permits employee housing/farm labor housing by-right in the A-1, A-3, and AM-2 zones and conditionally in the A-2 and AM-1 zones. No additional special conditions are described in the Land Use Ordinance for

any type of farm labor housing. These structures are treated the same as any other residential and residential accessory building. The County will amend the Land Use Ordinance to remove reference to farm labor housing and will allow employee housing in compliance with Health and Safety Code Sections 17021.5 and 17021.6 (Program ~~7~~8).

Processing and Permit Procedures

Design Review

The County established reasonable and necessary development standards for residential uses to ensure that development includes the appropriate public improvements and is compatible with surrounding land uses. All residential developments in the R-1, R-2, R-3, and R-4 zones must comply with developmental standards stated in Division 3 of the county's Land Use Ordinance. Landscaping standards are also established for mobile homes and RV parks, multi-unit residential, and single-unit residential.

All residential developments, including both single- and multi-family, -in the R-1, R-2, R-3, or R-4 zones much comply with the following:

- Street and road dedication shall be made to the County in the manner described by the Imperial County Public Works Department for all existing or proposed local, secondary, or collector highways. The required dedication shall be 30 feet from the centerline for local streets, 45 feet from the centerline for secondary streets, 55 feet from the centerline for collector highways, or as required by adopted, official or Specific Plans. In the case where a street is on the boundary of a development, a minimum of 40 feet shall be dedicated to the County.
- Development in all areas shall provide road or street improvements to County standards. Such street improvements shall include the required base and pavement to tie existing pavement to proposed entrances, exits, etc. Existing pavement shall be soft cut at a match point. If the project site abuts a state highway, road improvements shall be provided as required by the California Department of Transportation.
- Obstructions within street rights-of-way shall be removed as specified by Imperial County Public Works Department.
- Curbs, gutters, and sidewalks shall be constructed as required by County standards.
- All new on-site utility services shall be placed underground unless the utility supplier requests otherwise.
- Prior to the issuance of any Building Permits for new projects, plans for the management and disposal of all surface drainage water(s) originating on-site shall be approved by the Imperial County Department of Public Works in coordination with the Imperial County Public Health Department, Division of Environmental Health, as needed. All necessary easements, rights-of-way, or grant deeds shall be granted to the County for drainage purpose or access thereto as reviewed and approved by the Department of Public Works.

- Prior to issuance of any Building Permits, the methods of water supply and sewage disposal shall meet the requirements of and be approved by one or more of the following agencies: Imperial County Division of Environmental Health Services, California Department of Public Health, Regional Water Quality Control Board (Colorado River Basin) of the California Environmental Protection Agency.
- Fire protection facilities and access ways shall meet the requirements of and be approved by the Imperial County Fire Department /Office of Emergency Services.
- When adjacent to property zoned for non-residential purposes, a seven-foot-high solid masonry wall shall be constructed between the proposed development and the adjacent property. The wall height shall be reduced to 30 inches if the fence is obscured and 42 inches if translucent within the required front-yard setback area. The proposed wall design and materials shall be approved by the Planning and Development Services Department.
- All exterior lighting shall be directed away from adjacent properties, and away from or shielded from public roads.
- All trash receptacles shall be screened so that they are not visually obtrusive from any off-site location. The location and method of screening for all trash receptacles shall also minimize potential for nuisance, be consistent with ease of solid waste removal, and shall be approved by the Planning Director.
- Architectural design of all proposed structures shall be compatible with the surrounding neighborhood.
- For developments with 10 or more dwellings, a minimum of 5 percent of the net total parcel area shall be designated and developed as useable open space provided; however, no less than 400 square feet of useable area shall be designated and developed. The required useable area may be divided into more than one location, provided no single location is less than 400 square feet.
- During all on-site grading and construction activities, adequate measures shall be implemented to control fugitive dust emissions.

Imperial County's mixed-use flexibility zone (C-1, Light Commercial, and C-2, General Commercial) provides development opportunities for integrated, complementary residential and commercial development in the same areas. A wide range of uses is permitted, and it is the intent of the mixed-use flexibility zone to foster a mixture of product types. Development solely as commercial or residential districts is strongly discouraged. Design and development standards are directed toward encouraging pedestrian activity and ensuring that mixed commercial and residential uses are designed to be compatible both within the development and with other surrounding areas. All development in the C-0, C-1, C-2, C-3, M-1, M-2, and M-3 zones shall comply with the following:

- Street and road dedications shall be made to the County in a manner prescribed by Imperial County Public Works Department, for all existing or proposed local, secondary or collector highways. The

required dedication shall be 30 feet from centerline for local streets, 45 feet from centerline for secondary streets, 55 feet from centerline for collector streets.

- All developments shall provide road or street improvements as required by the Department of Public Works, and to the standards contained within the Land Use Ordinance (Title 9).
- Obstruction within street right-of-ways shall be removed as specified by Title 9.
- Curbs, gutters and sidewalks shall be constructed as required by Title 9 when required as part of the street improvement.
- All access driveways, parking areas and vehicular maneuvering areas shall be surfaced with a minimum of three (3) inches of asphaltic concrete paving or higher quality material.
- All new on-site utility services shall be placed underground.
- Prior to the issuance of Building Permits, a plan for the disposal of all surface drainage water originating on site shall be approved by the Department of Public Works in coordination with the Imperial County Public Health Department, Environmental Health Division, as needed. Easements or right-of-way deeds shall be granted to the County of Imperial for drainage purposes.
- Prior to the issuance of any Building Permit, the method of water supply and sewage disposal shall be as required and approved by one or more of the following agencies: Imperial County Environmental Health Services Division, California Department of Public Health, Regional Water Quality Control Board (Colorado River Basin) of the California Environmental Protection Agency.
- Fire protection facilities and access ways shall be as required and approved by the Imperial County Fire Department.
- When adjacent to property zoned for single family residential use, a seven (7) foot high masonry wall shall be constructed between the proposed development and the adjacent property.
- All exterior lighting shall be shielded and directed away from adjacent properties and away from or shielded from public roads.
- All trash receptacles shall be screened in such a manner so that they are not visually obtrusive from any off-site location. The location and method of screening for all trash receptacles shall also minimize potential for nuisance, be consistent with ease of solid waste removal, and shall be approved by the Planning Director.
- Architectural design of proposed buildings shall be compatible with the surrounding neighborhood.
- For industrial or commercial developments utilizing outside storage, the areas devoted to outside storage shall be treated with a dust binder or other dust control measures, as approved by the APCD.
- During all on-site grading and construction activities, adequate measures shall be implemented to control fugitive dust.

New development in the Mixed Use Overlay – Light Commercial (C1-MU) and General Commercial Use (C2-MU) zones is subject to a Site Plan Review Permit, in accordance with Division 3 of the Land Use Ordinance. The Planning and Development Services Department may approve a Site Plan Review Permit for new development in the C1-MU and C2-MU Zones upon making the following findings:

1. The proposed development is consistent with the General Plan, any applicable Specific Plans, and the intent and purpose of the mixed-use overlay.
2. The proposed development, as conditioned, will not have substantial adverse effects on the surrounding property or uses, and will be compatible with the existing and planned land use character of the surrounding area.
3. The proposed development is appropriate for the site and location by fostering a mixture and variety of land uses within the zone and the general vicinity and contributing to a synergistic relationship between uses.
4. The proposed development is harmonious with its surrounding environment. Buildings within a mixed-use development project must also be compatible with each other and be designed as an integrated, unified project.

All proposed developments must meet the design standards and guidelines in Division 3 (Site and Design Standards). Innovative project design, particularly involving infill development and reuse of existing structures, is required. However, the County has taken several steps to streamline the development review approval process. Design review is an administrative process that does not require a Planning Commission or Board of Supervisors hearing. The Imperial County Planning and Development Services Department has final review authority and may waive any of the above listed requirements for the residential, commercial, and industrial zones where a documented hardship not involving economics exists, or where there are unusual circumstances that prevent compliance with the required development standards listed above. ~~However~~Additionally, the County offers pre-application reviews (PAR) as an optional procedure for development proposals to provide direction for applicants by assessing whether a prospective proposal is consistent with County standards and requirements before a formal application submittal. PARs also aid in shortening processing time for development proposals once they are submitted by limiting requests to those findings made in the PAR letter. Request forms for a pre-application review are available on the County's website. The County h~~–~~as also included Program ~~27~~ 28 to review and update development standards to be objective and quantifiable. With the administrative review process and optional PARs, design review is not a constraint on development.

Conditional-Use Permits

A Conditional-Use Permit (CUP) provides a process for reviewing uses and activities that may be appropriate in the applicable zoning district, but whose effect on the site and surrounding uses cannot be determined before being proposed for a specific site. Imperial County has three types of conditional use permits: minor, intermediate, and major. A minor conditional-use permit (CUP-1) typically allows for a accessory dwelling unit, facilities for abused men/women/children for up to five users, temporary real estate during construction, and other non-residential uses. An intermediate conditional-use permit (CUP-2) allows for

facilities for abused men/women/children for in excess of five users and other non-residential uses. A major conditional-use permit (CUP-3) is for projects whose total developed value is greater than $1,000,000. Minor conditional-use permits may be approved or denied by the Planning Director or may be forwarded to the Planning Commission, while intermediate and major conditional-use permits shall be approved or denied by the Planning Commission. Appeals may be made to the Board of Supervisors. The County has included Program ~~15~~ 16 to remove conditional-use permit requirements for second units (now accessory dwelling units) and domestic violence shelters.

The following findings must be made for the Planning Director or Planning Commission to approve an application for a conditional-use permit:

1. The proposed project is consistent with the General Plan.
2. The project is consistent with Title 9 of the Imperial County Land Use Ordinance.
3. The Director of Public Works, the Director of Air Pollution Control District, the Director of Environmental Health (EH), the Director of Fire/Office of Emergency Services (OES), the Agriculture Commissioner, and the Sheriff have reviewed the proposed project and approved the project.
4. Public opposition has been considered and all impacts have been mitigated.
5. The applicant agrees to all conditions and standards required for the project.

Findings

The findings required to authorize a conditional-use permit do not constrain the development of affordable housing. The following list does not contain any language that calls out any special conditions for affordable housing types. Any use permitted with a conditional-use permit must satisfy all of the following criteria:

- The proposed use is consistent with the goals and policies of the adopted County General Plan.
- The proposed use is consistent with the purpose of the zone within which the use will be located.
- The proposed use is listed as a use within the zone or sub-zone or is found to be similar to a listed conditional use.
- The proposed use meets the minimum requirements of the Land Use Ordinance applicable to the use and complies with all applicable laws, ordinances, and regulations of the County of Imperial and the State of California.
- The proposed use will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.
- The proposed use does not violate any other law or ordinance.
- The proposed use is not granting a special privilege.

Compatibility findings for conditional use permits ensure that projects initially comply with Imperial County regulations and include ongoing monitoring to confirm that the project continues to comply throughout the development process. While conditional use permit findings do place requirements on projects, they are necessary to ensure compatibility between uses and protect the health and safety of the public and do not place unnecessary constraints on development.

Local Processing and Permit Procedures

The County strives to perform thorough but expedient permit processing, with average processing times equal to or less than those of similar jurisdictions. Permit processing time varies based on the type and specifics of development applications. The approximate permit processing times for all types of permits is shown in Tables A-45 and A-46. The typical permit processing time for residential development greatly depends on whether the proposed development is a permitted use or if a rezone or conditional-use permit is required.

After the County approves a project, such as at Planning Commission or Board of Supervisors hearing, it becomes the applicant's responsibility to initiate the steps to secure building permits and approvals and begin construction as per approved plans. These steps include obtaining additional County clearances and paying fees as outlined in a project's conditions of approval. Other necessary actions include:

- Completing construction drawings
- Recording subdivision (final) maps (applies to ownership projects)
- Retaining contractors
- Obtaining utility approvals, required easements and rights of entry

The length of time between a project's approval and building permit issuance in many cases is determined by the applicant. Once a project begins the construction plan review process, the following general timelines can be achieved with responsive applicants:

- Land Use Entitlement Procedures may state at 3-6 months but if they are considered major projects, the process could take up to a year or more
- Building permit approval: 1-3 months

Senate Bill 330 Processing Procedure

Senate Bill 330, the Housing Crisis Act of 2019, established specific requirements and limitations on development application procedures. Consistent with SB 330, housing developments for which a preliminary application is submitted that complies with applicable General Plan and zoning standards are subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent

after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application.

Imperial County offers pre-application meetings to anyone with a proposed project prior to submission of formal applications to better define the information needed to review a project. Pre-application meetings have helped to shorten the review process and allow for better communication between applicants and County departments. The County currently defers to HCD for the required application process but will consider creating a County specific process during the planning period.

Senate Bill 35 Approvals

Senate Bill 35 requires jurisdictions that have failed to meet their RHNA to provide streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. Imperial County will also establish a written policy or procedure and other guidance as appropriate to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects, as set forth under California Government Code Section 65913.4 (Program ~~27~~28).

TABLE A-45
PROCESSING REQUIREMENTS AND FEES SCHEDULE

Project Type	INITIAL REVIEW AND COMMENT PERIOD		CEQA PROCESS		
	Application Review for Completeness and Consistency	Responsible Agency Comment Period	Preparation of Environmental Checklist (Initial Study)	Project Exempt from CEQA	Environmental Evaluation Committee Hearing
Typical Time Frame	**10 to 30 days[1]**	**15 days[1]**	**15to 30 days[1]**	**15 to 30 days[1]**	**90 days[2]**
Conditional-Use Permit					
Minor	Yes		N/A	Yes	N/A
Intermediate	Yes		Yes	N/A	Yes
Major	Yes		Yes	N/A	Yes
Subdivision					
Minor	Yes		Yes	N/A	Yes
Major	Yes		Yes	N/A	Yes
Lot Line Adjustment	Yes		N/A	Yes	N/A
Lot Merger	Yes		N/A	Yes	N/A
Certificate of Compliance	Yes		N/A	Yes	N/A
Change of Zone	Yes		Yes	N/A	Yes
General Plan Amendment	Yes		Yes	N/A	Yes
Variance	Yes		N/A	Yes	N/A
Envir. Assessment (only)	Yes		Yes	N/A	Yes
Time Extensions	Yes		N/A	Yes	N/A

Source: Imperial County Planning and Development Services, 2021

1. The project acceptance, agency review, initial study preparation or exempt for CEQA, are all done concurrently with one another typically within the first 30 days of receiving the project.

2. Some projects are subject to public hearings. If that is the case, County staff sends the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

TABLE A-46
AVERAGE DISCRETIONARY PERMIT PROCESSING TIMES

Project Type	CEQA PROCESS (continued)			PROJECT APPROVAL PROCESS	
	Circulation Period[1]			Appeal of EEC Determination to Planning Commission	Planning Commission Hearing
	Neg. Dec.	Mit. Neg. Dec.	EIR		
Typical Time Frames	**20 days**	**30 days**	**1 year**	**10 days[2]**	**up to 180 days[3]**
Conditional-Use Permit					
Minor	N/A			N/A	Yes
Intermediate	If Determined			If Appealed	Yes
Major	If Determined			If Appealed	Yes (need B/S App)
Subdivision					
Minor	If Determined			If Appealed	Yes
Major	If Determined			If Appealed	Yes (need B/S App)
Lot Line Adjustment	N/A			N/A	Yes
Lot Merger	N/A			N/A	Yes
Certificate of Compliance	N/A			N/A	Yes
Change of Zone	If Determined			If Appealed	Yes (need B/S App)
General Plan Amendment	If Determined			If Appealed	Yes (need B/S App)
Variance	N/A			N/A	Yes
Envir. Assessment (only)	If Determined			If Appealed	Yes
Time Extensions	N/A			N/A	Yes

Source: Imperial County Planning and Development Services, 2021

1. This time chart assumes all projects receive a Negative Declaration, which requires a 20-day circulation period or a Mitigated Negative Declaration, which requires a 30-day circulation. For projects that require an Environmental Impact Report, add up to one year.

2. Both the applicant and the public have 10 days from the date of hearing to appeal the hearing's determination to the next hearing body. The appeal of the Board of Supervisors can only be done with a majority of the supervisors agreeing to it.

3. County staff send the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

TABLE A-46 (CONT.)
AVERAGE DISCRETIONARY PERMIT PROCESSING TIMES

Project Type	PROJECT APPROVAL PROCESS (continued)					TOTAL		
	Appeal of PC Determination to Board of Supervisors		Board of Supervisors Hearing	Appeal of B/S back to B/S		Processing Time[3]		
Typical Time Frames	10–days[1]	10days[2]	10days[1]	Best	Worst	Avg.		
Conditional-Use Permit Minor	If Appealed			N/A		34 days	74 days	40 days
CUP Intermediate	If Appealed			N/A		54 days	150 days	75 days
CUP Major	N/A		Yes	If Appealed		74 days	157 days	92 days
Subdivision Minor	If Appealed			N/A		54 days	150 days	75 days
Subdivision Major	N/A		Yes	If Appealed		74 days	157 days	92 days
Lot Line Adjustment	If Appealed			N/A		34 days	74 days	40 days
Lot Merger	If Appealed			N/A		34 days	74 days	40 days
Certificate of Compliance	If Appealed			N/A		34 days	74 days	40 days
Change of Zone	N/A		Yes	If Appealed		74 days	157 days	92 days
General Plan Amendment	N/A		Yes	If Appealed		74 days	157 days	92 days
Variance	If Appealed			N/A		34 days	74 days	40 days
Envir. Assessment (only)	N/A			N/A		54 days	150 days	75 days
Time Extensions	If Appealed			N/A		34 days	74 days	40 days

Source: Imperial County Planning and Development Services, 2021

1. Both the applicant and the public have 10 days from the date of hearing to appeal the hearing's determination to the next hearing body. The appeal of the Board of Supervisors can only be done with a majority of the supervisors agreeing to it.

2. County staff send the project packages to the Commission members (all hearings levels) within 10 days of next scheduled hearing. The Environmental Evaluation Committee and the Planning Commission each meet twice a month and the Board of Supervisors four times a month.

3. Processing Time

Review of Local Ordinances

The County does not have any locally adopted ordinances that hinder the development of housing.

Development Fees

Planning and Building fees vary greatly depending on the type of development. A developer proposing a multifamily project will submit building plans to the Building Department and pay the corresponding building permit and development fees (see Table A-47A). The proposal is then forwarded to the Planning Department for site plan review, zoning review is included in the building permit fees. The same is true for single-family developments if the proposed site is already mapped. If not mapped, the applicant would be charged for a minor or major subdivision, depending on the size of the development. New construction building fees are based on a *Nexus Methodology Study* conducted in November 2004 and adopted by the Board of Supervisors. These fees are based on actual processing costs and 100-percent cost recovery and do not present a constraint to development. Concurrently with this Housing Element update, the County is updating building fees and will ensure new fees do not constrain development.

Development impact fees are a potential constraint to affordable housing development. The County charges impact fees for sheriff, general government, fire, parks and recreation, and libraries. Impact fees for unincorporated areas total $4,673 per unit for a single-family dwelling, $~~3,662~~4,146 per unit for multifamily housing, and $3,205 per mobile home unit (see Table A-47). The County Board of Supervisors approved these development fees as well as an exemption for residential units in projects constructed as housing for lower-income households, as such households are defined pursuant to Section 50079.5 of the Health and Safety Code. Additionally, developers of senior citizen residential units are only required to pay 60 percent of the total impact fee amount per unit.

Development fees may be reduced through the application of the state density bonus law, which allows developers that provide certain percentages of a project's total units affordable to lower-income households to receive a density bonus or other incentive or concession. The County abides by the state density bonus law and works with developers that request reductions in development standards or fee waivers.

The County's development standards and fees are available on the County's website.

TABLE A-47
IMPERIAL COUNTY IMPACT FEES

Impact Fee	Single-Family	Multi-Family	Mobile Home
Sheriff	$317	$727	$217
General Government	$350	$267	$239
Fire	$1,273	$977	$871
Parks and Recreation	$452	$354	$303

Public Works	$1,894	$1,453	$1,296
Library Service District	$387	$368	$279
Total Impact Fees	$4,673	$4,146	$3,205

Source: Imperial County Code of Ordinances Title 4, 2008

TABLE A-47A
IMPERIAL COUNTY LAND USE FEES

Process	Total Fee
Application/Process Types	
Appeal (Director to P.C.)	$650
Time Extension by Director	$400
Time Extension by P.C./BOS	$800
Zoning Review - Building Permit	$150
Zoning Information Letter (per parcel)	$150
Administrative Permitting/Hearing	$2,250
Design Review - Residential - base (1 unit)	$600
Design Review - Residential - each additional unit	$350
Specific Planning	
General Plan Amendment	$12,000
Zone Change	$11,500
Specific Plan Review	$13,500
Variance	$1,000
CEQA Review Only (Minor)	$2,500
CEQA Review Only (Major)	$2,500
Notice of Exemption	$550
Subdivisions	
Minor Subdivision (<4 lots)	$5,700
Major Subdivision (>5 lots)	$12,000
Lot Line Adjustment (<4 lots)	$3,350
Lot Merger (<4 lots)	$3,350
Reversion to Acreage	$5,200
Certificate of Compliance	$1,600
Conditional-Use Permits (CUPs)	
2nd Dwelling - Administrative CUP	$1,500
2nd Dwelling - P.C. CUP	$2,000
Minor CUP	$3,300

Process	Total Fee
Intermediate CUP	$5,500
Major CUP	$11,000
Public Works Survey Review	
Legal Description Review: Lot Line Adjustment/Lot Merger/Certificate of Compliance	$300
Legal Description Review: Road Right-of-Way	$400
Reversion to Acreage	$400
Annexation Map Review (LAFCO)	$500
Environmental Constraint Sheet	$350
Amending Certificate	$200
Amending Map	$400
Corner Record Card	$7
Record of Survey	$500

Source: Imperial County Land Use Ordinance, Division 9, 2015
P.C. = Planning Commission, BOS = Board of Supervisors

On-and Off-Site Improvements

Developers of multifamily projects and single-family housing tracts are generally responsible for on- and off-site improvements, including curbs, gutters, and sidewalks, and, depending on the location, extension of sewer and water services. This requirement is necessary because it is the only way to provide infrastructure to developments and does not present a constraint to development.

Residential developments in the R-1, R-2, R-3, and R-4 zones are subject to the following site improvement requirements and standards:

- Dedicate streets and roads to the County. The required dedication is 30 feet from the centerline for local streets, 45 feet from the centerline for secondary streets, and 55 feet from the centerline for collector highways. Typical street widths are 60 feet for local residential streets, 70 to 84 feet for collectors, 102 to 136 feet for arterials, and 210 feet for expressways.
- Connect proposed exits and entrances to existing pavements.
- Provide curbs, gutters, and sidewalks.
- New on-site utility services must be placed underground unless the utility supplier requests otherwise.
- Plans for management and disposal of surface drainage water(s) originating on-site.
- Adequate drainage, potable water, and sewage disposal.

- Provide fire protection facilities and access ways that meet requirements of Imperial County Fire Department/Office of Emergency Services.
- When adjacent to property zoned for non-residential purposes, construct a seven-foot-high solid masonry wall.
- A lighting plan, exterior lighting shall be directed away from adjacent properties and public roads.
- Developments of 10 or more dwellings must provide a minimum 5 percent of the net area as usable open space.

Residential development is also subject to landscaping requirements based on the residential use, as follows:

- Mobile Home/R.V. Parks
  - A minimum of 10 percent of the developed lot area must be landscaped. Ornamental or landscaping rock and gravel areas, artificial turf, or other artificial materials shall be considered hard surface and not qualify as part of the 10 percent.
  - Setback areas must be landscaped. Within these areas, trees must be planted no further than 50 feet apart and no closer than 5 feet from the edge of the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.
  - Within the interior of the mobile home park/R.V. park, at least one tree per space must be provided.
  - Within each planter or landscaped area, an irrigation system and live landscaping shall be provided and continually maintained.
  - Landscaping materials, including trees, shrubs, and ground cover should be the type suitable for the climatic conditions of the County of Imperial and shall be low volume water-use plants.
  - Minimum tree size or shrub size to be planted for any new development shall be of the five gallon capacity or larger.
- Multi-unit residential
  - A minimum of 15 percent of the total developed area must be landscaped (in addition to any required park or open space area).
  - Setback areas, excluding driveways, sidewalks, and maneuvering areas, must be landscaped. Within these areas, trees must be planted no further than 30 feet apart and no closer than 5 feet from the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.
  - A minimum of 10 percent of off-street parking areas must be planters and landscaped areas.
  - All interior open space area shall be landscaped with live landscaping.
- Single-unit residential

- A minimum of 20 percent of the total developed lot area must be landscaped.
- The setback areas, excluding driveway entrances and public walkways, must be landscaped. Within these areas, trees must be planted no further than 30 feet apart and no closer than 5 feet from the sidewalk. No material that will grow to a height of more than 12 inches shall be planted between the curb edge and sidewalk.

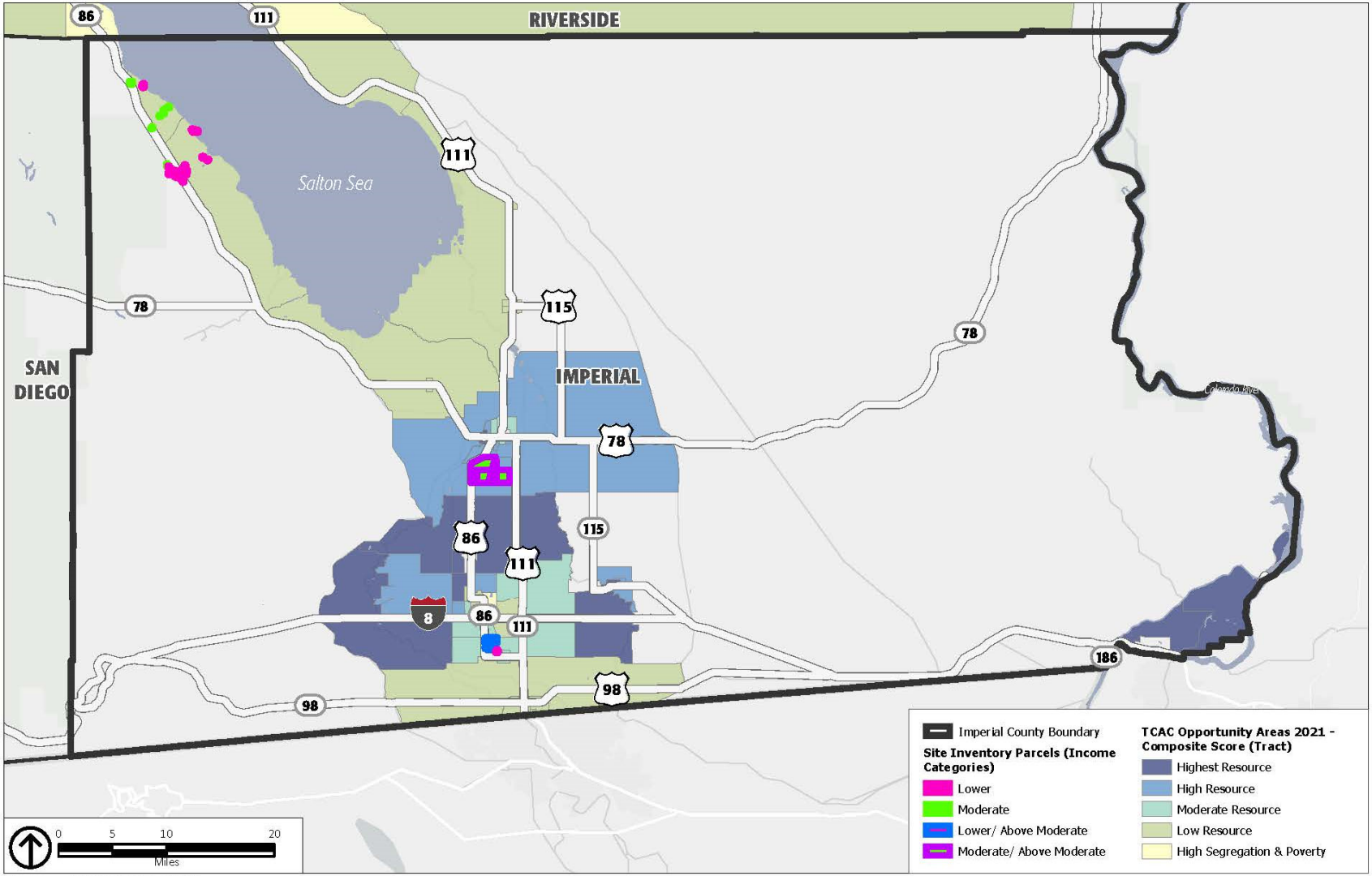
Building Codes and Enforcement

The County has adopted the 2019 California Building Code, which regulates the construction of all physical structures in the county. This code is widely used throughout California, and its implementation in Imperial County does not impose additional or unusual constraints to housing development. Use of this standardized code, rather than a locally prepared building code, may reduce costs, as developers are not burdened with learning the detailed regulations of a unique code. The County has not made any local amendments to the Building Code.

The County has active code enforcement and building inspection programs that work to uphold adopted codes and encourage the improvement of substandard dwelling units. Violations are primarily identified on a complaint basis or through the general observation of Building Code officers.

Appendix B: Fair Housing Maps

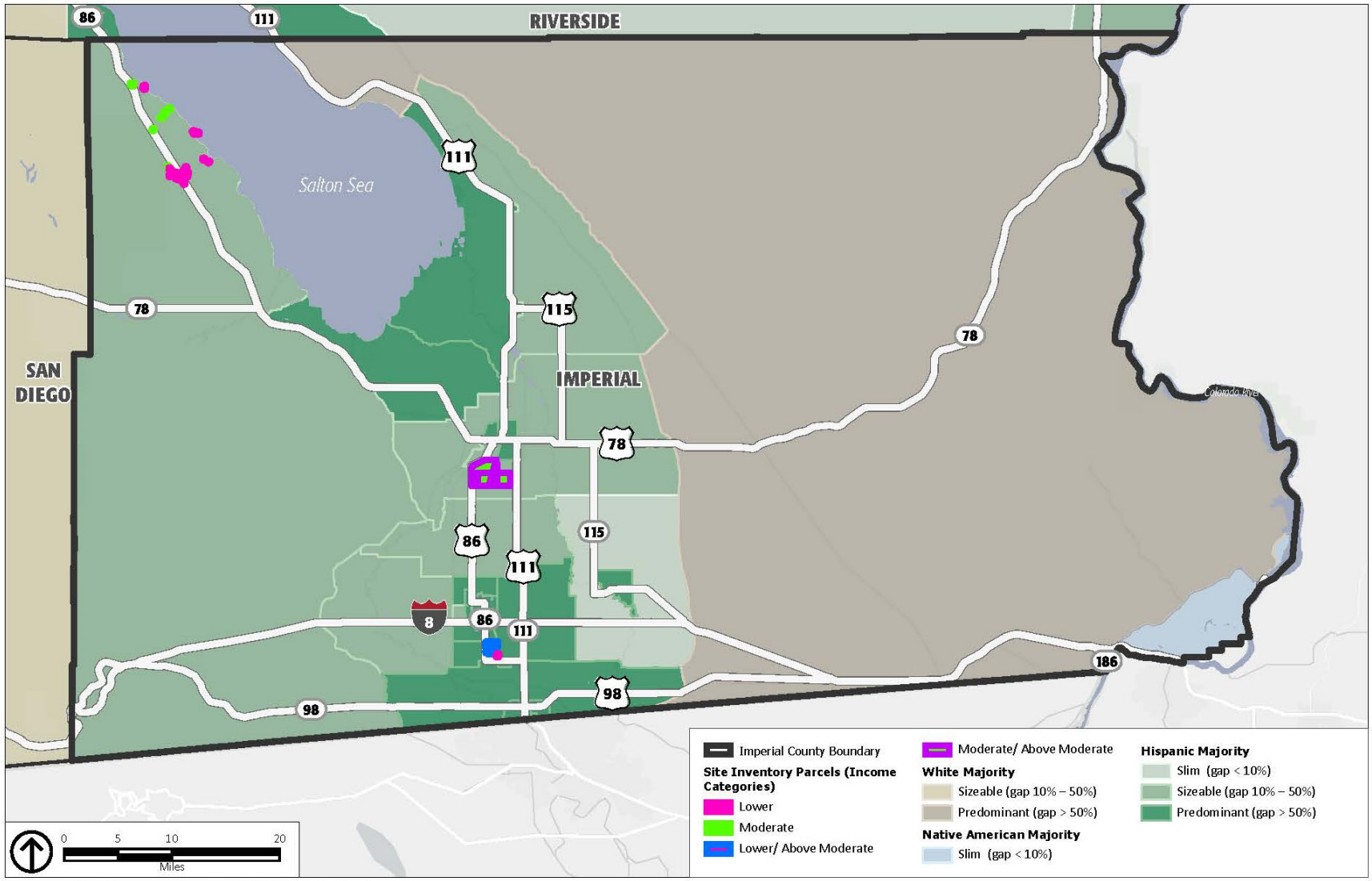
FIGURE B-1
SITES INVENTORY AND TCAC/HCD OPPORTUNITY AREAS



Source: TCAC/HCD, 2021.

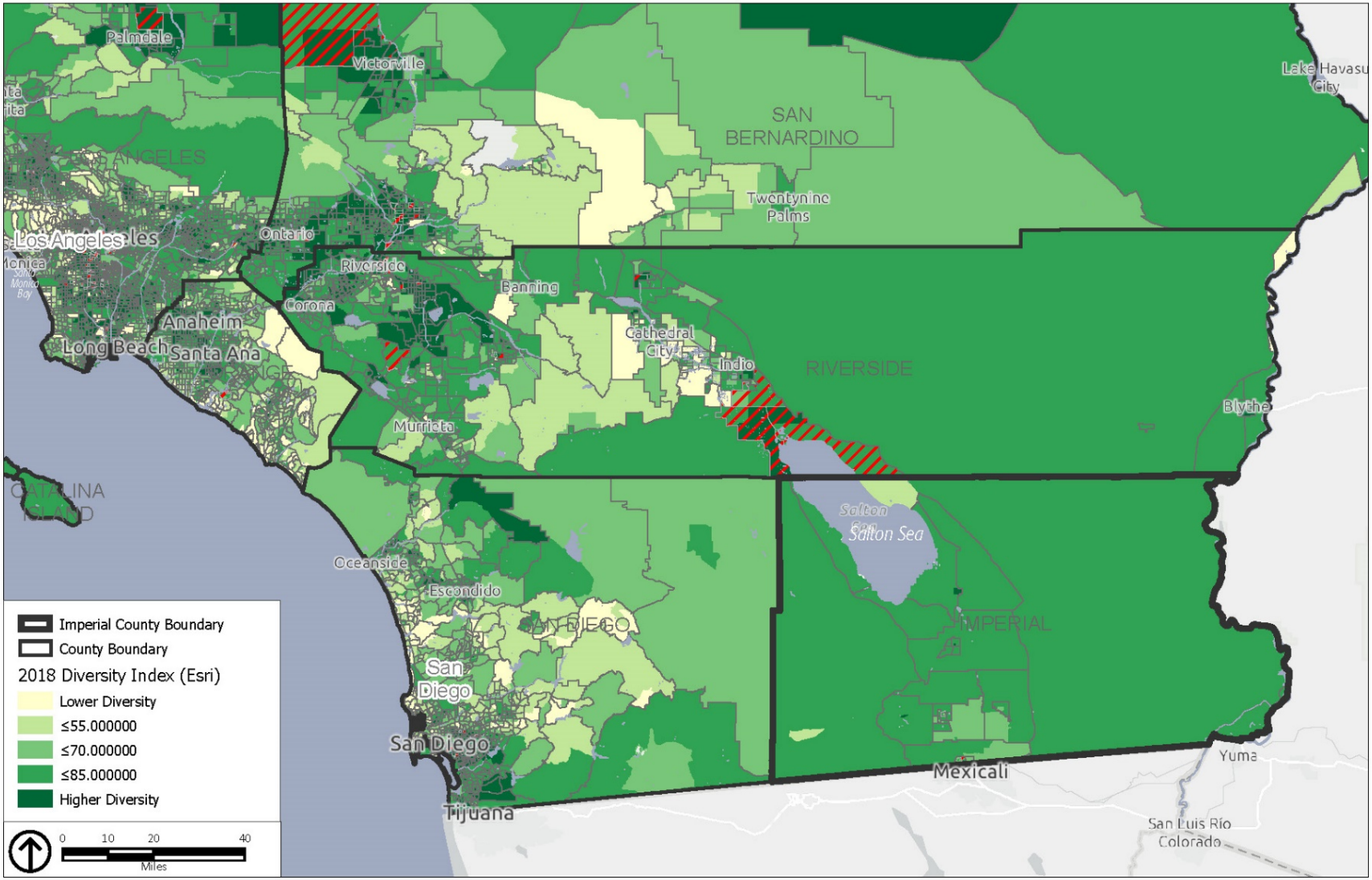
FIGURE B-2

SITES INVENTORY AND PREDOMINANT POPULATION ~~– HISPANIC MAJORITYS~~



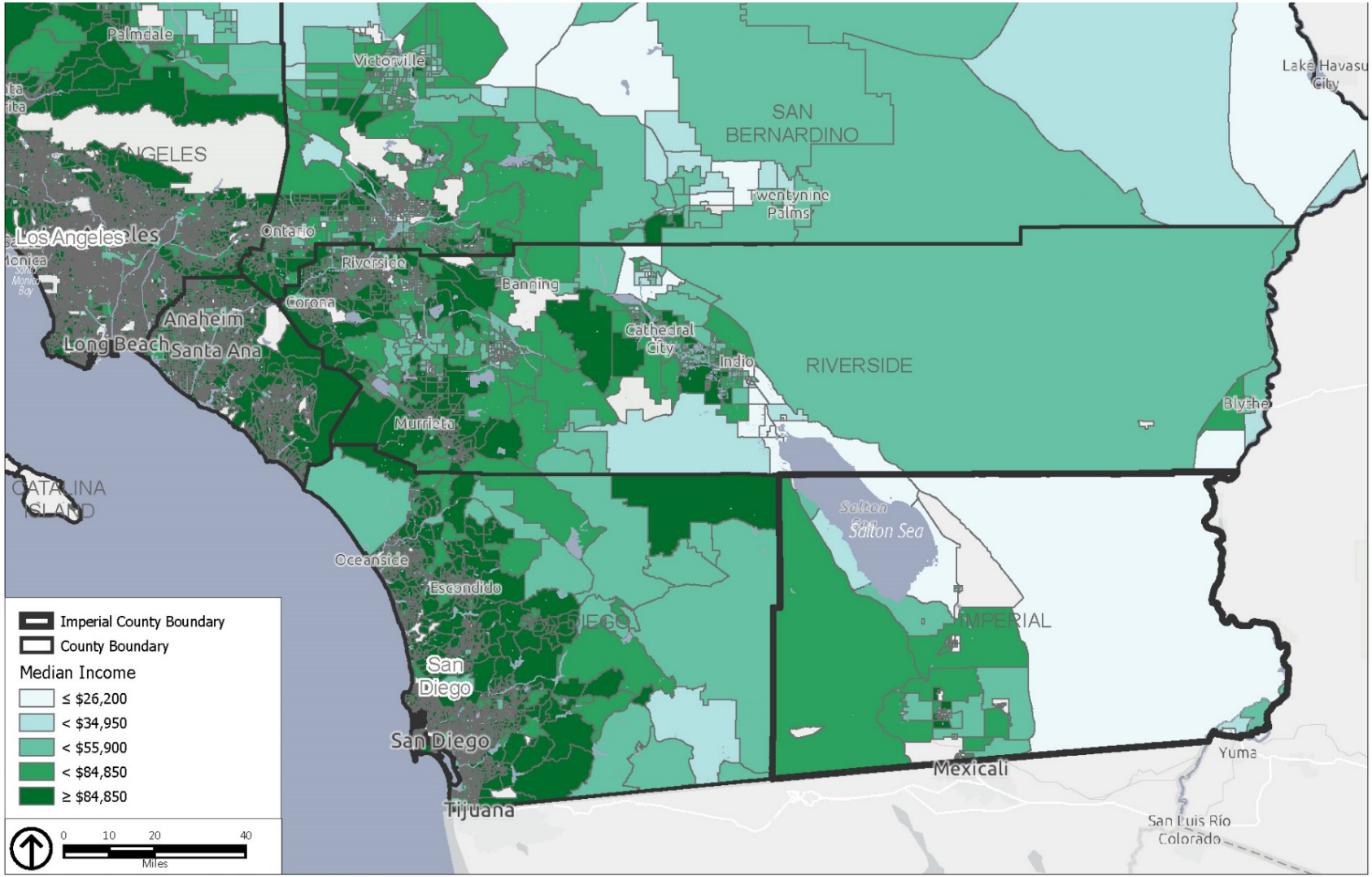
Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-3
DIVERSITY INDEX 2018



Source: Esri, 2018.

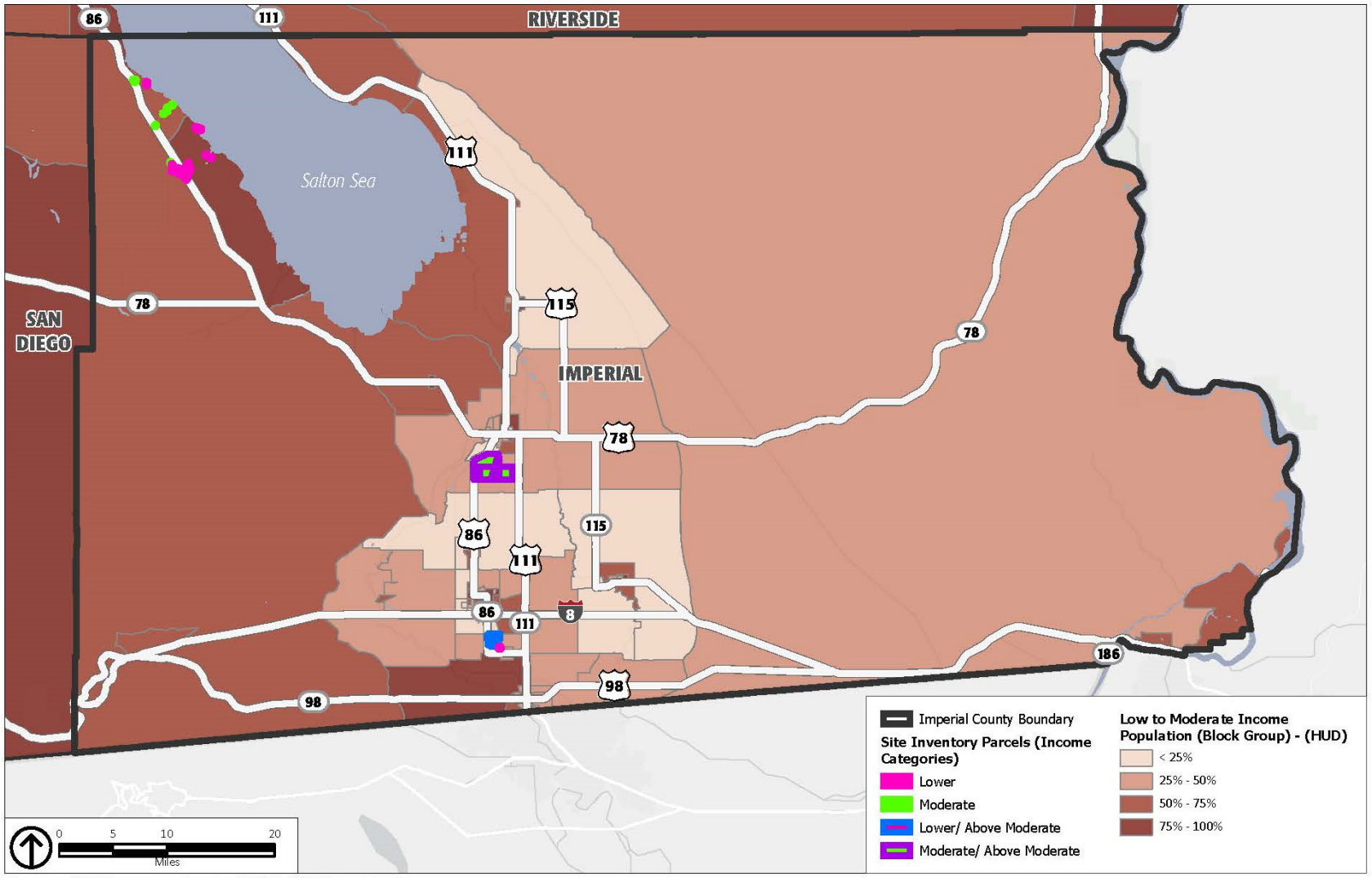
FIGURE B-4
MEDIAN INCOME (2015-2019)



Source: ACS 5-year estimate (2015-2019), by tract.

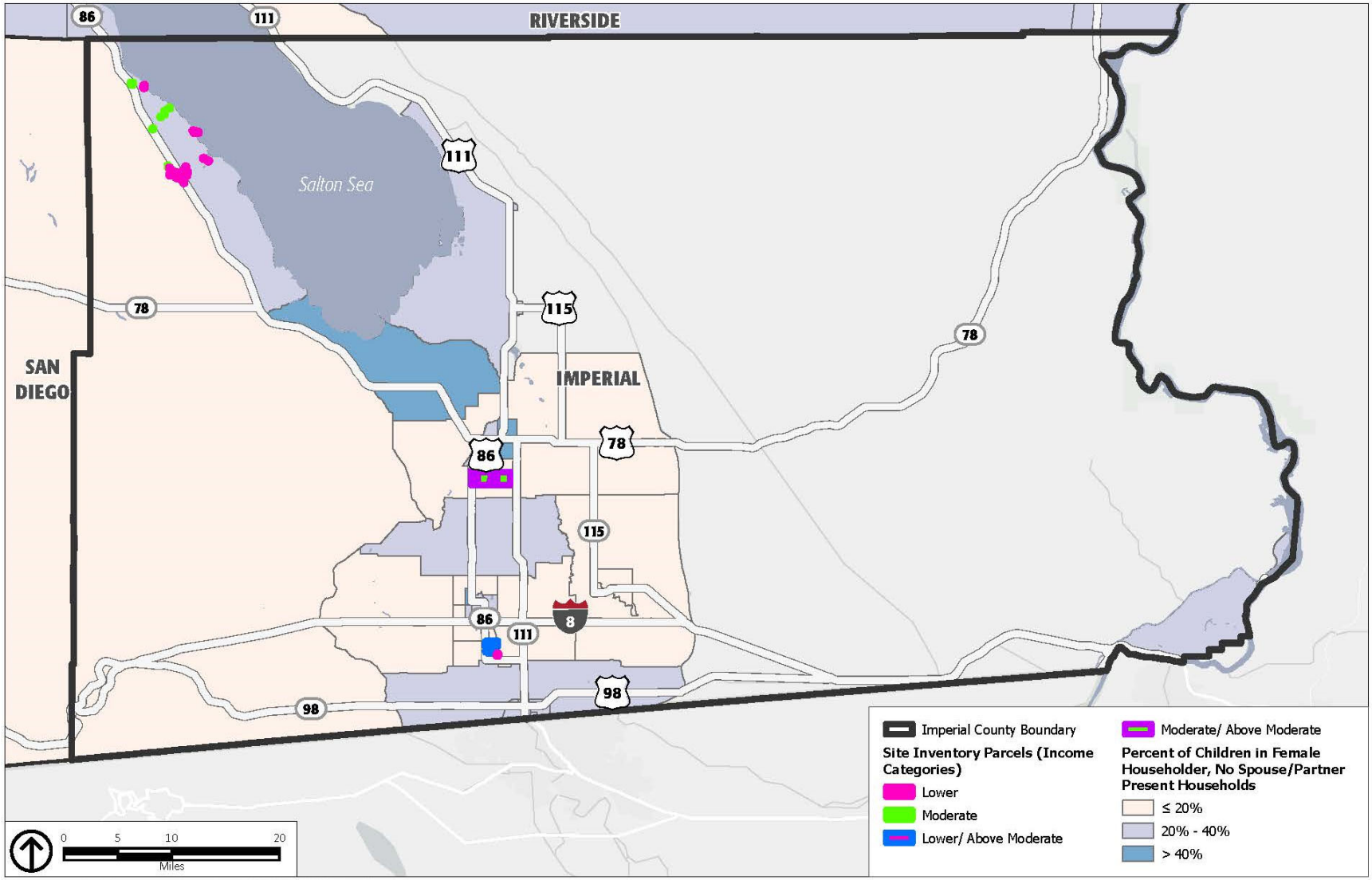
FIGURE B-5

SITES INVENTORY AND PERCENT OF POPULATION WITH LOW- TO MODERATE-INCOMES



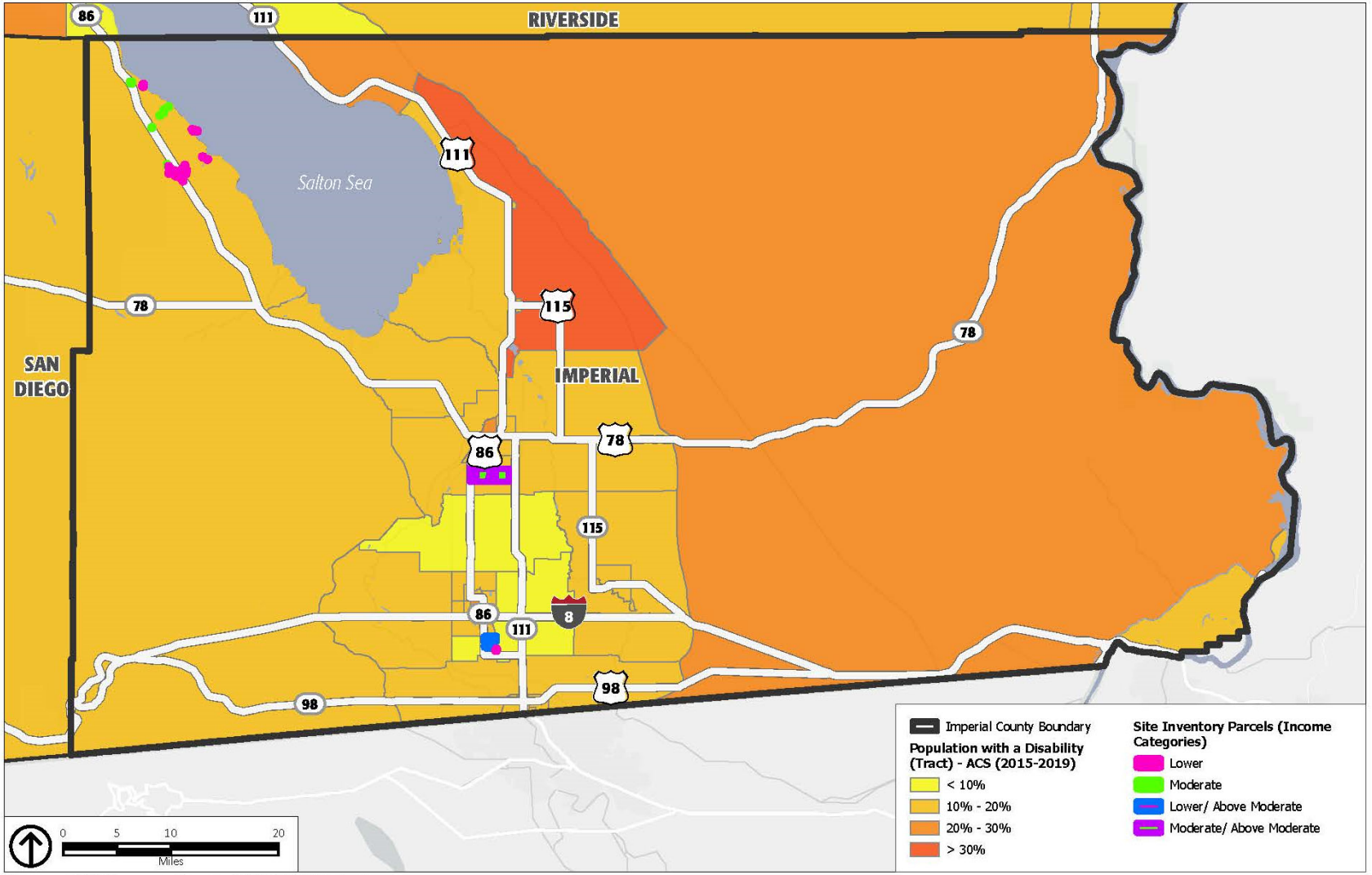
Source: ACS 5-year estimate (2015-2019), by block group.

FIGURE B-6
SITES INVENTORY AND PERCENT FEMALE-HEADED HOUSEHOLDS WITH CHILDREN



Source: ACS 5-year estimate (2015-2019), by tract.

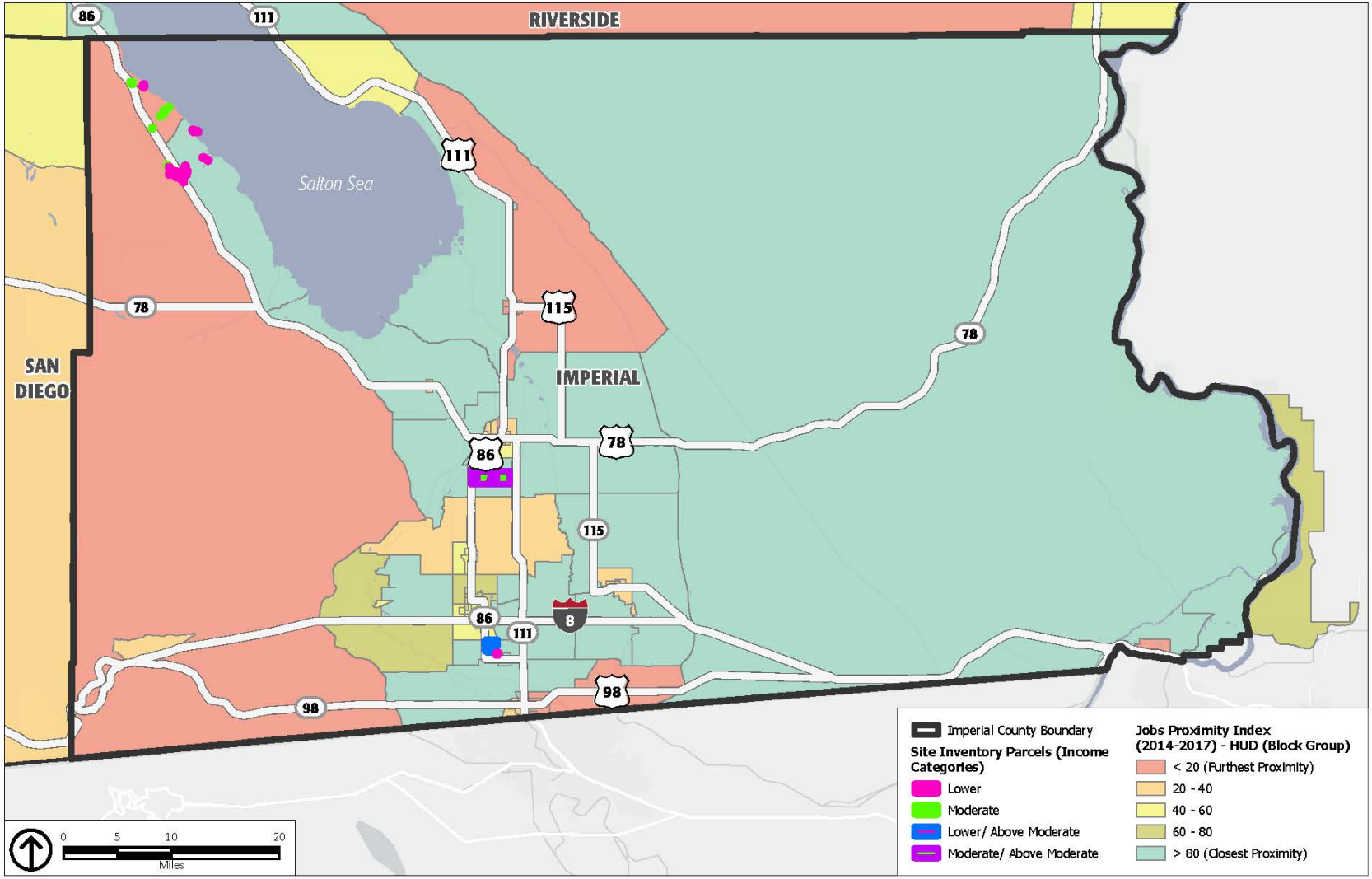
FIGURE B-7
SITES INVENTORY AND PERCENT OF POPULATION WITH A DISABILITY



Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-~~85~~

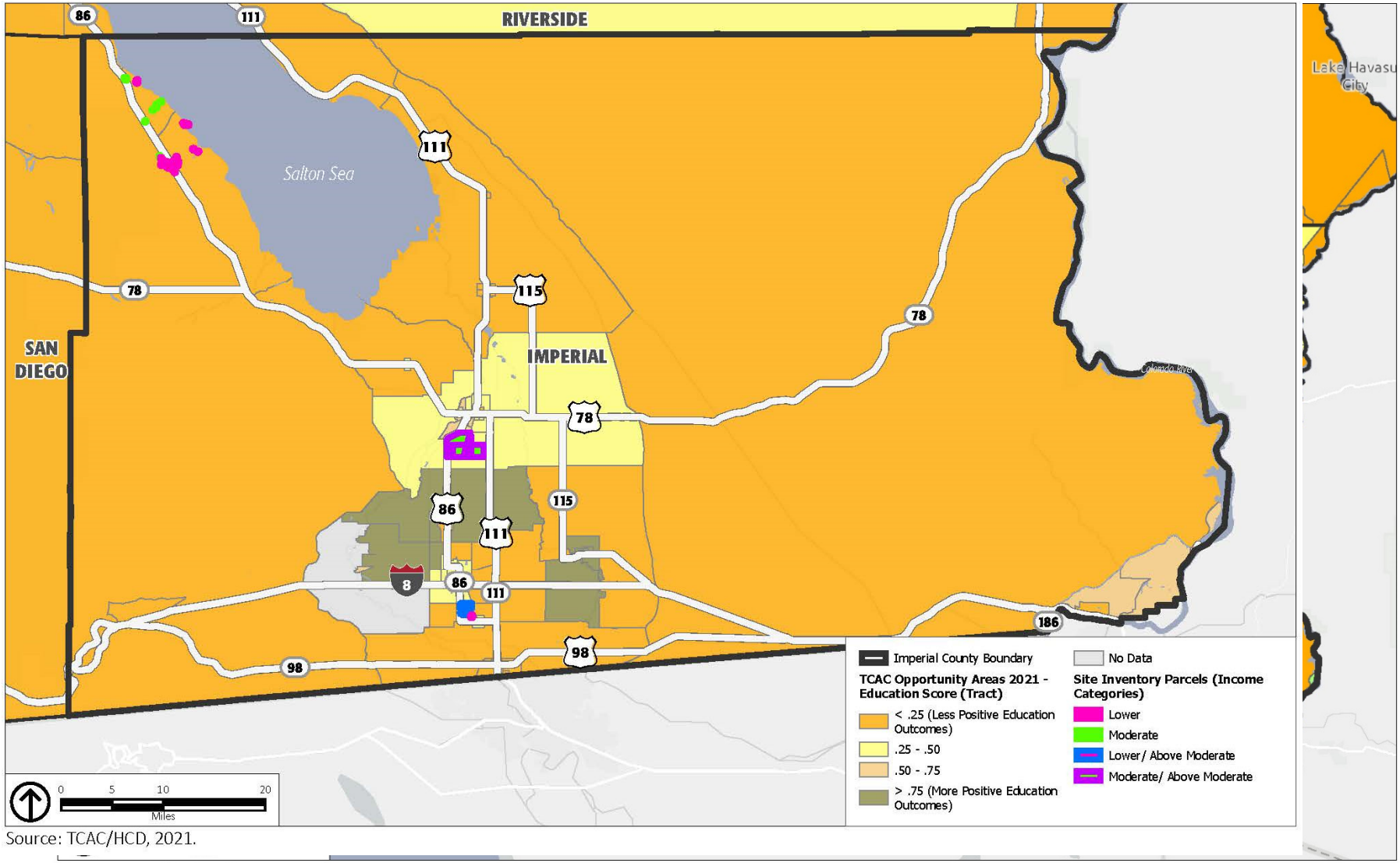
SITES INVENTORY AND JOB PROXIMITY INDEX (2014-2017)



Source: HUD 2014-2017.

FIGURE B-~~96~~

SITES INVENTORY AND TCAC/HCD EDUCATION SCORE

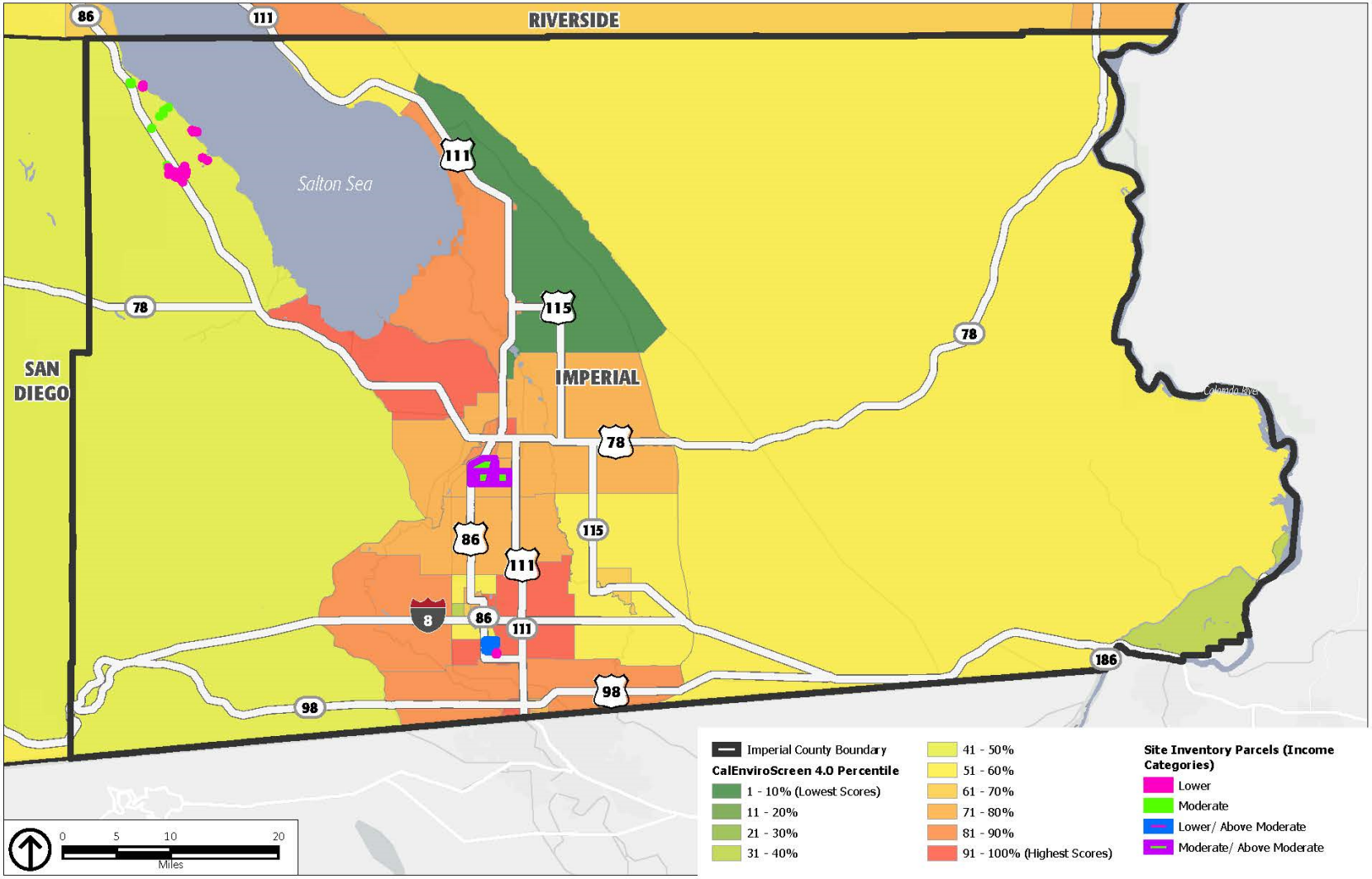


Source: TCAC/HCD, 2021.

Source: TCAC/HCD, 2021.

FIGURE B-~~7~~10

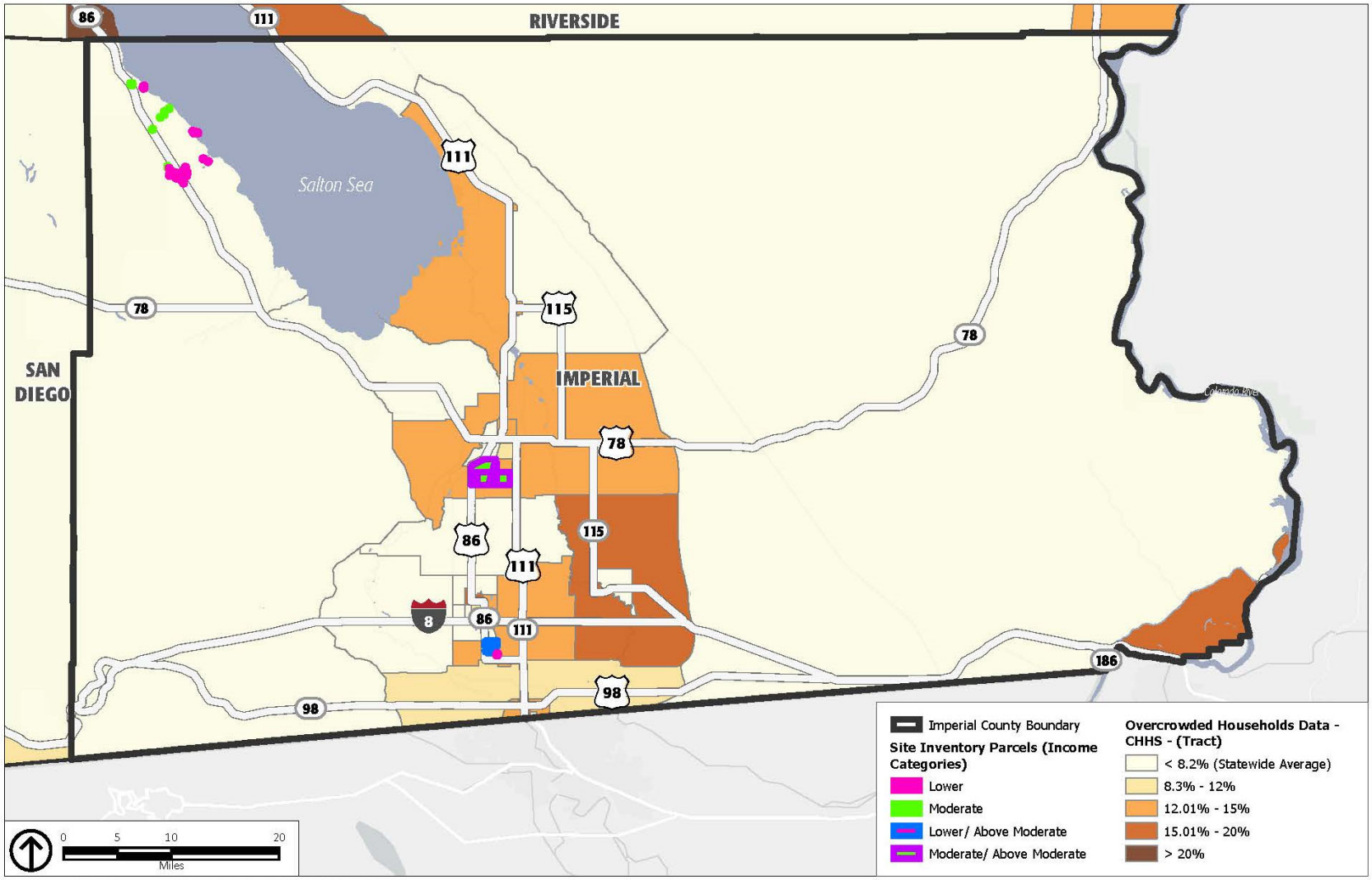
SITES INVENTORY AND ENVIRONMENTAL CONDITIONS



Source: TCAC/HCD, 2021.

Source: California Office of Environmental Health Hazard Assessment, 2021

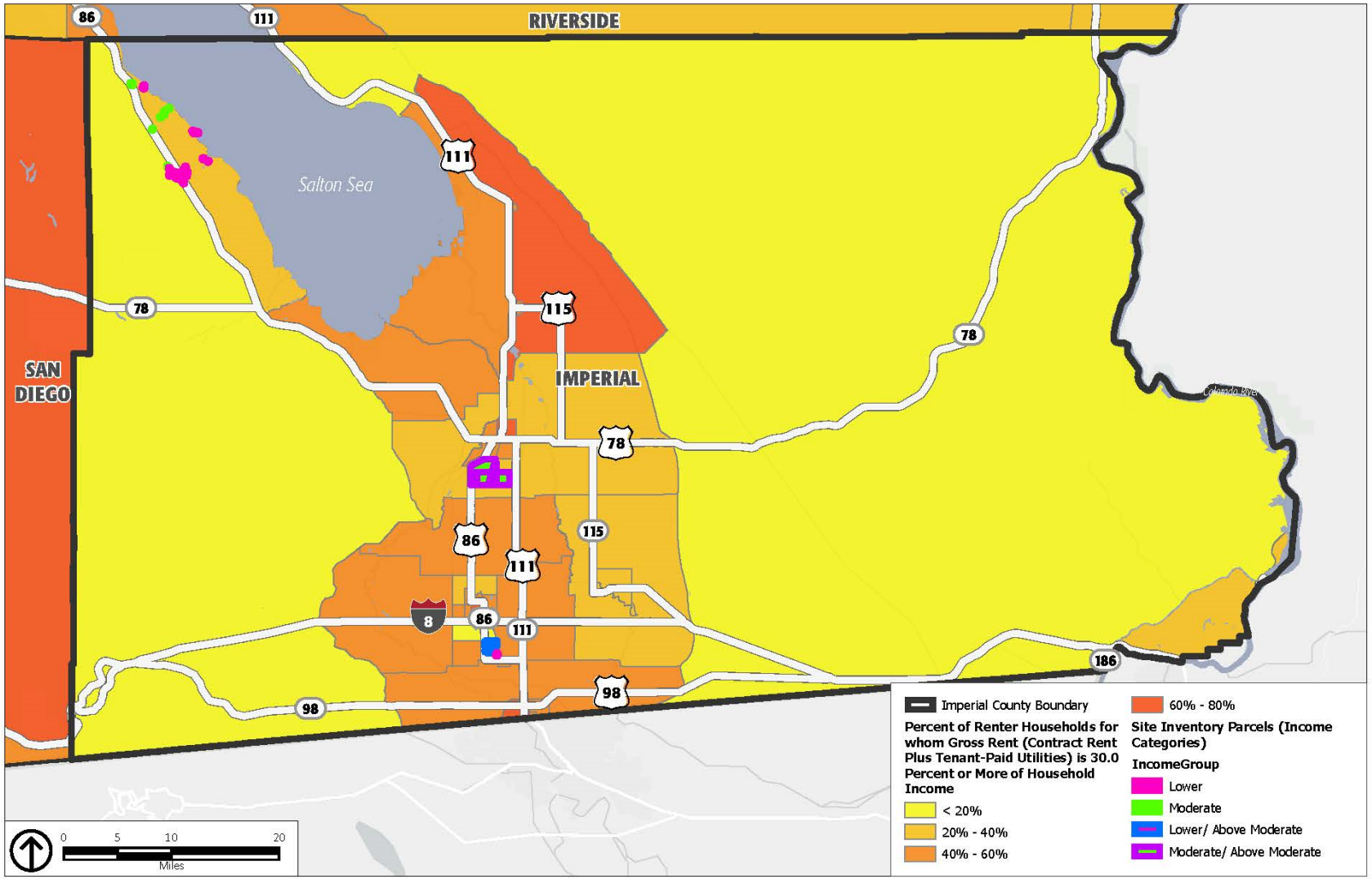
FIGURE B-11
SITES INVENTORY AND OVERCROWDED HOUSEHOLDS



Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-~~8~~12

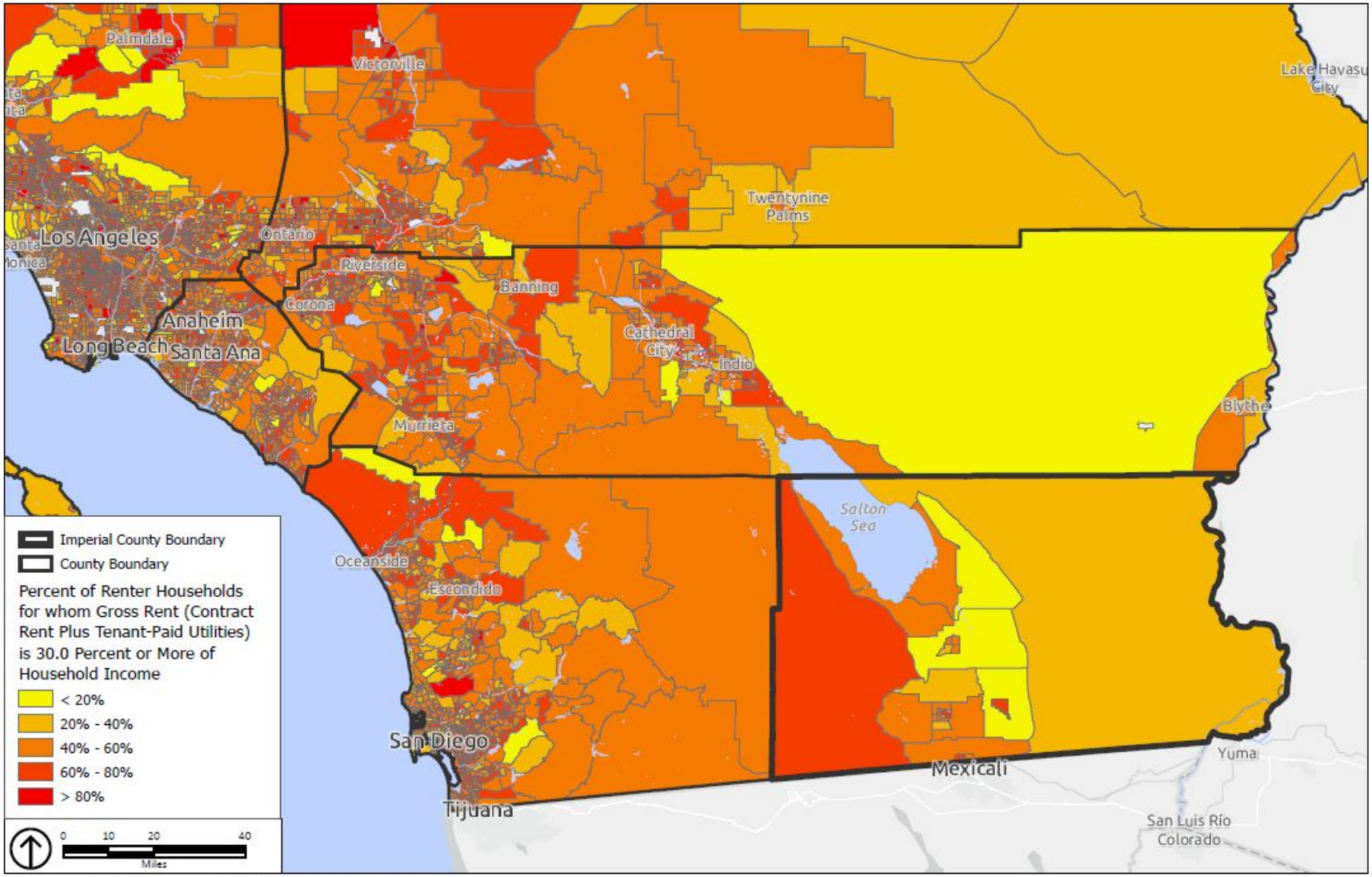
SITES INVENTORY AND OVERPAYMENT BY RENTERS (2015-2019)



Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-~~9~~13

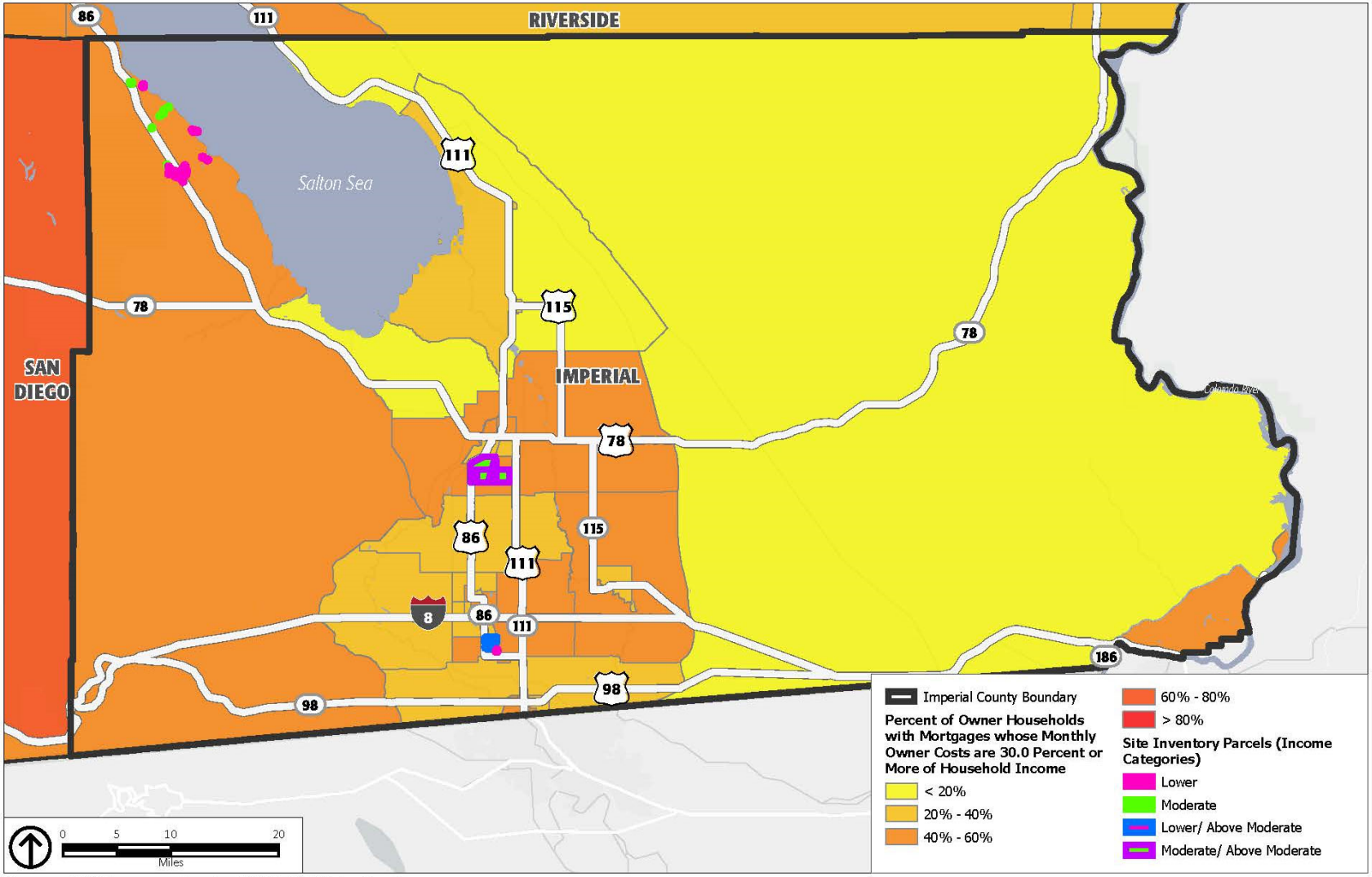
OVERPAYMENT BY RENTERS (2010-2014)



Source: ACS 5-year estimate (2010-2014), by tract.

FIGURE B-~~10~~14

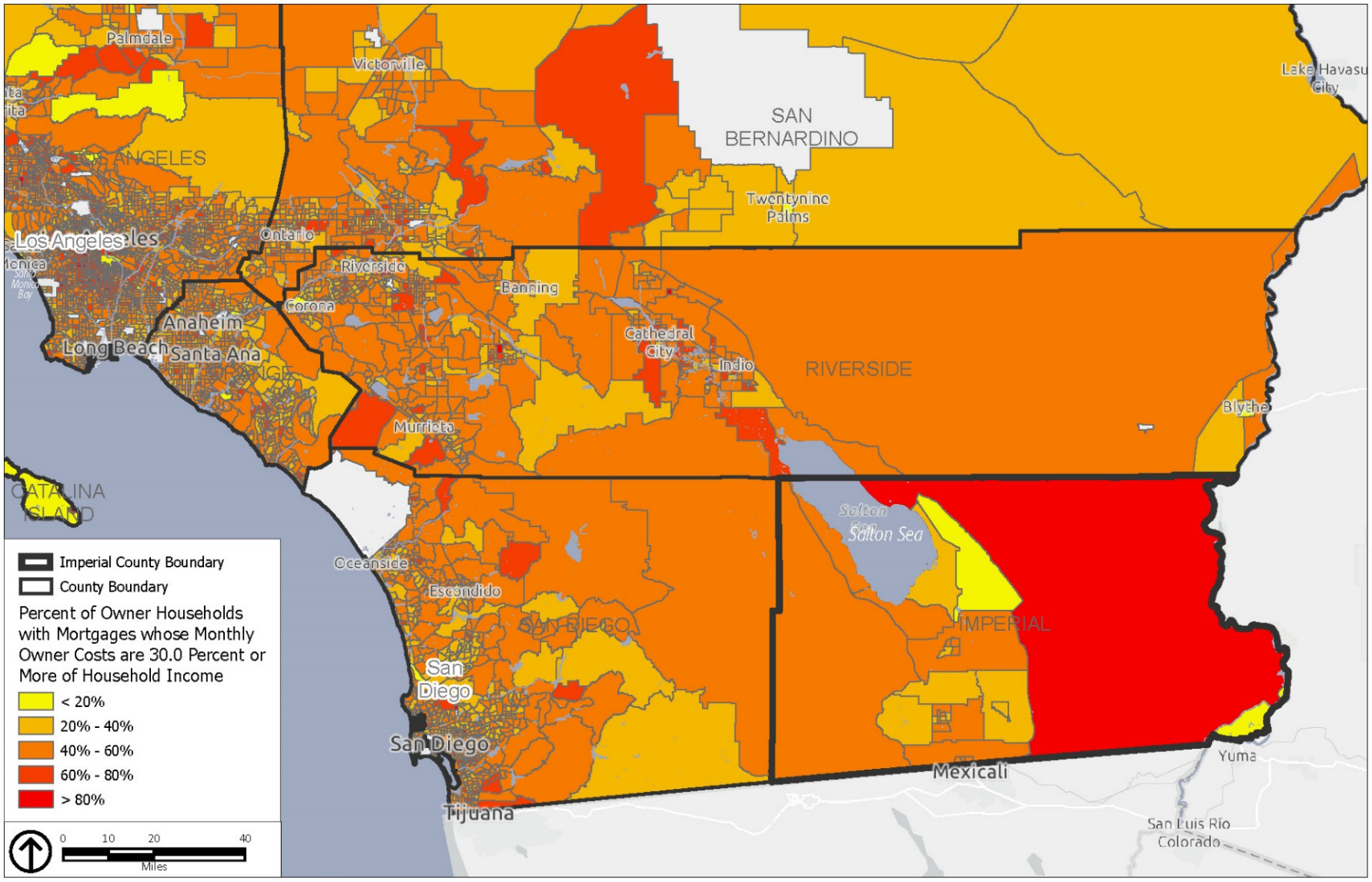
SITES INVENTORY AND OVERPAYMENT BY HOMEOWNERS (2015-2019)



Source: ACS 5-year estimate (2015-2019), by tract.

FIGURE B-~~11~~15

OVERPAYMENT BY HOMEOWNERS (2010–~~2017~~2014)



Source: ACS 5-year estimate (2010-2014), by tract.

Appendix C: Adequate Sites Map

FIGURE C-1
HOUSING SITES INVENTORY, COUNTYWIDE

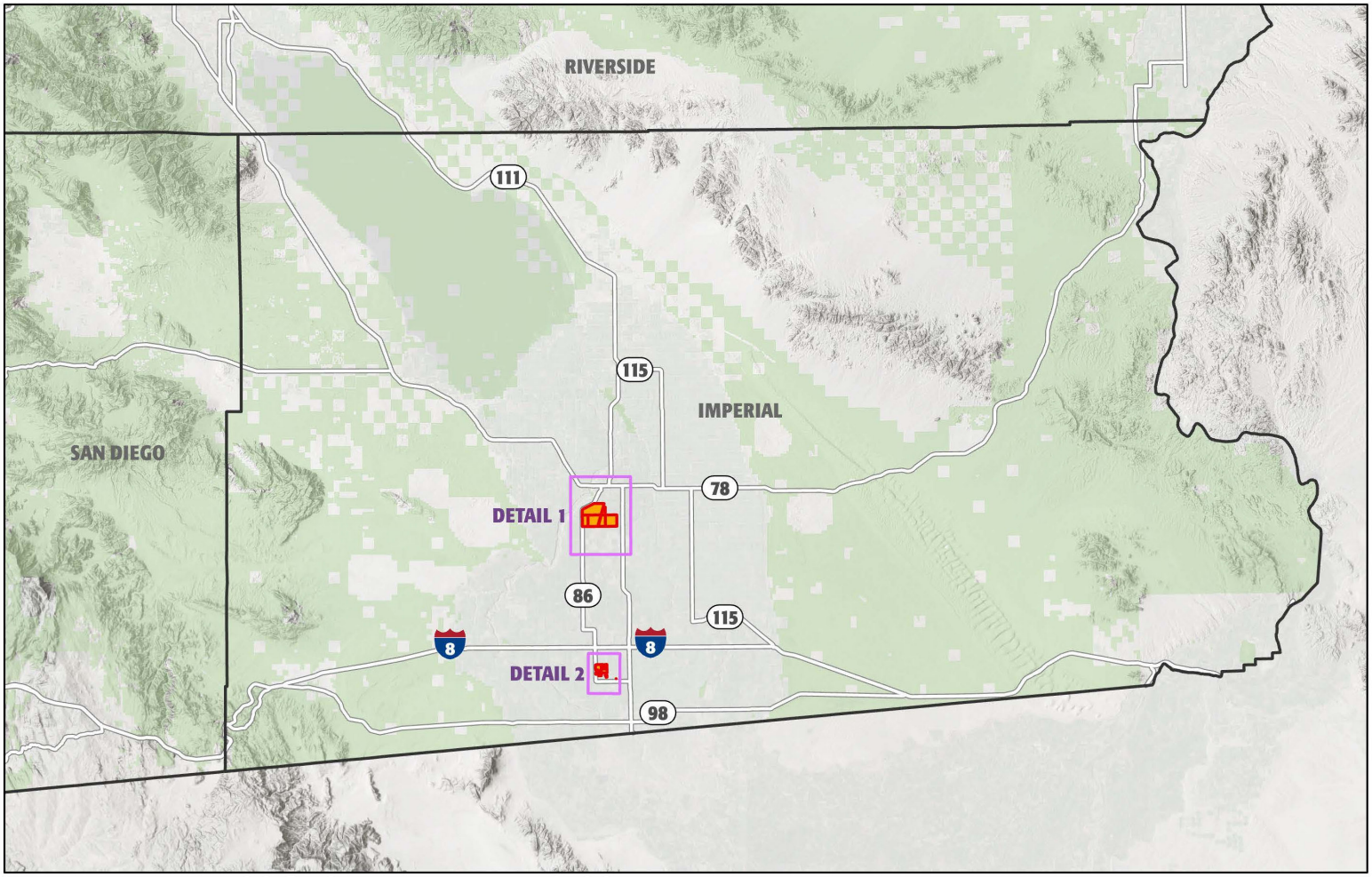
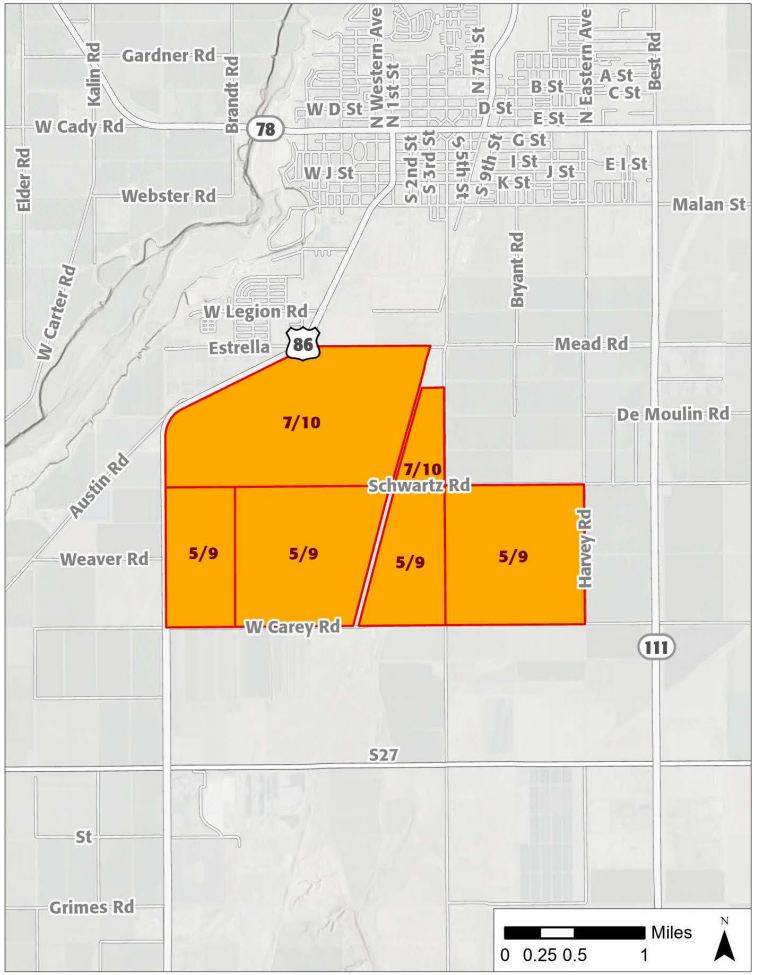
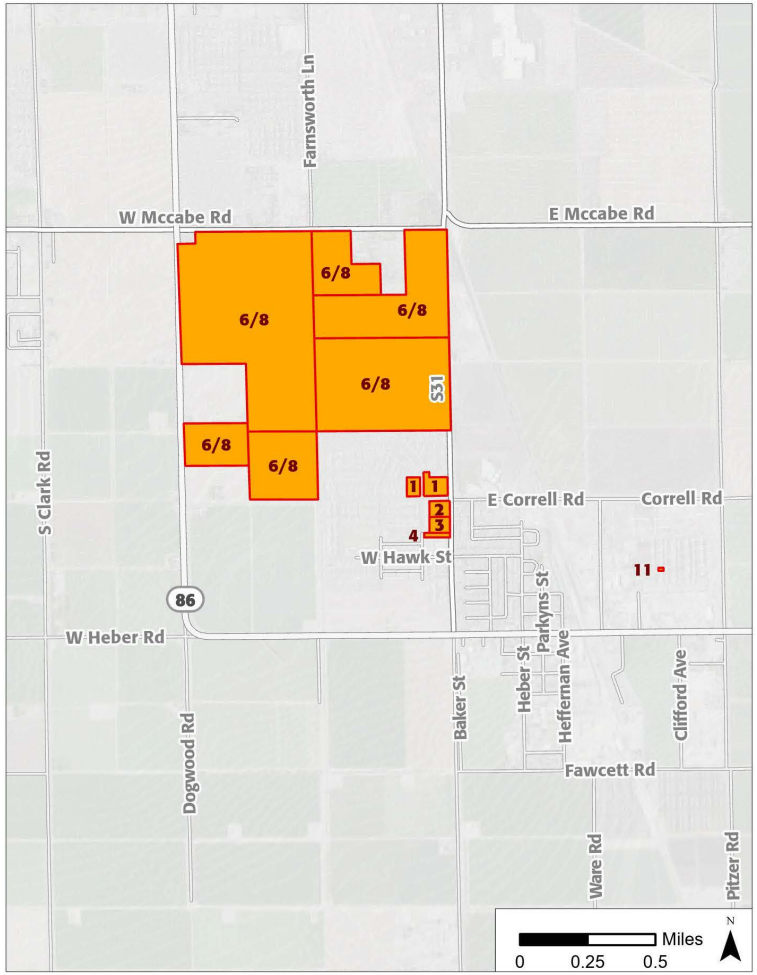


FIGURE C-2
HOUSING SITES INVENTORY



Available Housing Sites- Detail 1



Available Housing Sites- Detail 2

Appendix D: Glossary of Terms

The following definitions are commonly used terms in the Housing Element:

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

Accessory Dwelling Unit: A dwelling unit that is a separate living quarter from the principal dwelling unit and has its own kitchen and bathroom. Also referred to as "granny" or "in-law apartments."

Affordability: Annual housing costs are considered affordable when they do not exceed 30 percent of gross annual household income. For homeowners, this cost includes principal and interest payments. For renters, this includes monthly rent and utilities.

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

Affordable Housing: Refers to the relationship between the price of housing in a region (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: 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: Existing subsidized below-market-rate rental housing units that are threatened with conversion to market-rate rents because of the impending termination of use restrictions due to expiration or non-renewal of subsidy arrangements.

Below-Market-Rate (BMR) Unit: 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.

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 objective of the CDBG program is to facilitate 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 US Department of Housing and Urban Development's Shelter Plus Care, Section 8 Moderate Rehabilitation Single-Room Occupancy Dwellings (SRO) Program, and Supportive Housing Program (US House Bill 2163).

Decennial Census: Every ten years, the US 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 US 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 is 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: The number of housing units on a unit of land (e.g., 10 units per acre).

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

Development Impact Fee: 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 landowner 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.

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 the 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 paid back over a specified period.

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 multi-family structures. Vacation or second homes and rental properties are also included.

Elderly Units: Specific units in a development restricted to residents over a certain age (as young as 55 years). 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 (per Health and Safety Code 50801): Housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay

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

Entitlement City: A city, which based on its population, is entitled to receive funding directly from HUD. Examples of entitlement programs include CDBG, HOME, and ESG.

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): 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.

Family Households: A household in which the householder lives with one or more individuals related to him or her by birth, marriage, or adoption.

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.

Fannie Mae: Established in 1938 by the federal government and becoming a private company in 1968, Fannie Mae operates under a congressional charter that directs it to channel their efforts into increasing the availability and affordability of homeownership for low-, moderate-, and middle-income Americans. Fannie Mae receives no government funding or backing and is one of the nation's largest taxpayers. Fannie Mae does not lend money directly to homebuyers. Instead, it works with lenders to make sure they don't run out of mortgage funds, so more people can achieve their goal of homeownership.

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

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

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: A legal document, adopted by the legislative body of a city or county, setting forth policies regarding long-term development.

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

Habitable (room): 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: 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.

Handicap 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.

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 US 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 were two important changes to the Hispanic origin question for Census 2000. First, the sequence of the race and Hispanic origin questions for Census 2000 differed 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 (US 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.

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

HUD: The United States Department of Housing and Urban Development is a 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, which are determined by the median household income at the local level.

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

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.

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

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.

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.

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 childcare. There are nine titles under the McKinney-Vento Act that are administered by several different federal agencies, including the US Department of Housing and Urban Development (HUD). McKinney-Vento Act Programs administered by HUD include the 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 (US House Bill 2163).

Median Income: 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) occurring on the same lot or in close proximity to each other. Cities and counties 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): A Federal Income Tax Credit Program. An MCC increases the loan amount for which an applicant qualifies and it increases an applicant's take-home pay. The MCC entitles applicants to take a federal income tax credit of 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.

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 (US 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 (US 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 (US House Bill 2163).

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 US Department of Housing and Urban Development (HUD) administers federal aid to local housing agencies 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 percent 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 US Department of Agriculture's Rural Development. The RHA offers financial aid to low-income residents of rural areas.

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 Imperial Valley 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.

Single-Room Occupancy Dwelling (SRO): 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 healthcare facilities.

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.

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

Supportive Housing (per Health and Safety Code 50675.14(b)): Housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260 and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

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.

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.

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 guarantee 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 (US House Bill 2163).

Workforce Housing: Refers to housing that is meant for residents earning 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, police officers, and other public employees.

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 "capital" 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.

US Census Terms

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

Own Children: Sons and daughters, including stepchildren and adopted children, of the householder. Similarly, "own" children in a subfamily are sons and daughters of the married couple or parent in the subfamily. (All children shown as members of related subfamilies are own children of the person(s) maintaining the subfamily.) For each type of family unit identified in the CPS, the count of "own children under 18 years old" is limited to never-married children; however, "own children under 25"and "own children of any age," as the terms are used here, include all children regardless of marital status. The counts include never-married children living away from home in college dormitories.

Related Children: Includes all people in a household under the age of 18, regardless of marital status, who are related to the householder. It does not include the householder's spouse or foster children, regardless of age.

Ethnic Origin: People of Hispanic origin were identified by a question that asked for self-identification of the persons' origin or descent. Respondents were asked to select their origin (and the origin of other household members) from a "flash card" listing ethnic origins. People of Hispanic origin in particular, were those who indicated that their origin was Mexican, Puerto Rican, Cuban, Central or South American, or some other Hispanic origin. Note that people of Hispanic origin may be of any race.

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 Size: Refers to the number of people in a family.

Family Type: Refers to 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."

Household: A household includes all the people who occupy a housing unit as their usual place of residence.

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.

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.

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

Household Type and Relationship: Households are classified 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.

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.

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 has incomes below the median.

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 one person per room.

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

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, 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 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.

Race: The race of individuals was identified by a question that asked for self- identification of the person's race. Respondents were asked to select their race from a "flashcard" listing racial groups.

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

Single-Family Attached Housing: 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 nonresidential structures.

Single-Family Detached Home: 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.

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 (per Health and Safety Code 50675.2(h)): Buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

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 do share a floor/ceiling.

Unemployed: 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 four 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 percentage.

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. In determining the number of units in a structure, all housing units, both occupied and vacant, are counted.

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.

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.

White: In decennial census data, the White category includes persons having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicate their race as ''White'' or report entries such as Irish, German, Italian, Lebanese, Near Easterner, Arab, or Polish. The "alone" designation, as used with decennial census data, indicates that the person reported only one race.

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 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.

BOS ADOPTED: 02-08-22
M.O. #20c

RESOLUTION OF THE BOARD OF SUPERVISORS, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, FOR THE ADOPTION OF THE GENERAL PLAN AMENDMENT GPA #20-0004 TO UPDATE THE HOUSING ELEMENT 2021-2029 PLAN

RESOLUTION NO. 2022-17

WHEREAS, based on the statement of goals for updating the 2021-2029 Housing Element,

1. Ensure the availability of a variety of housing types for all income levels throughout the county.
2. Encourage affordable housing developments by utilizing all available funding sources, offering developer incentives, and allowing a wide range of housing types to serve the housing needs of the county's labor force, special needs groups, and families of all income levels.
3. Continue to facilitate the provision of housing suited to persons with special housing needs.
4. Facilitate the provision of fair housing opportunities for all residents of Imperial County.
5. Encourage the improvement, rehabilitation, and revitalization/ reinvestment of the county's existing residential neighborhoods.
6. Promote sustainable development by encouraging the inclusion of energy conservation features in new and existing housing stock.

WHEREAS, an Initial Study conducted on the proposed revision of the Housing Element, did not identify any significant effect on the environment which would result from the proposed project and the Environmental Evaluation Committee determined that a Negative Declaration should be prepared; and,

WHEREAS, an Initial Study and Negative Declaration was prepared for the proposed project & made available for the public review on July 15, 2021, pursuant to the California Environmental Quality Act; and,

WHERAS, the Planning Commission heard the Housing Element update project at a regular scheduled public hearing on September 22, 2021 and made a recommended for approval to the Board of Supervisors; and,

WHEREAS, the proposed Housing Element updates are intended to implement the Housing Element policies and programs of the General Plan. After consideration of policy options, changes to state laws since the adoption of the General Plan Housing Element, public testimony and input from the public, the Board of Supervisors has determined that the proposed 2021-2029 Housing Element update best achieves consistency with the goals and objectives of the Housing Element and conformance with state law, and are therefore consistent with the General Plan Housing Element, other Elements of the General Plan; and,

WHEREAS, the proposed Housing Element 2021-2029 update changes do not involve any direct physical changes to the environment. No changes in landforms or land uses are proposed as a part of the proposed amendments and all public services for existing land uses will remain as-is, with no changes and no diminishment of service or safety. Moreover, the proposed amendments would be consistent with the land uses and development anticipated by the General Plan.

WHEREAS, the Board of Supervisors, having considered all materials, file information, the Negative Declaration, all public and agency comments, and all reports from staff, and the recommendation by the Planning Commission, does make the following findings:

1. *The General Plan Amendment/Housing Element Update is consistent with the overall County of Imperial General Plan.* The Housing Element Update and General Plan Amendment project is the County of Imperial's document for meeting future housing needs, including housing affordable to lower income households. The purpose of the Housing Element is to establish specific goals, policies, programs, and objectives relative to the provision of housing, and to adapt an action plan toward this end. The 2021-2029 County of Imperial Housing Element Update and General Plan Amendment is a response to the State of California's mandate of requiring a Housing Element within every General Plan. General Plan Amendment #20-0004, as submitted by the Planning & Development Services Department proposing a Housing Element Update to the Imperial County General Plan as mandated by the State of California pursuant to Section 65580-65589.11 of the Government Code, requiring the Housing Element be updated every 8 years.

2. *The General Plan Amendment/Housing Element Update will be consistent with the State and Federal regulations.* The draft Housing Element update for 2021-2029 was submitted to the State of California Department of Housing and Community Development for review and the County received a letter dated January 18, 2022 from the Department of Housing and Community Development that stated Imperial County's proposed 2021-2029 Housing Element addresses the statutory requirements of State housing element law and as a result, the element will comply with Article 10.6 of the Government Code once adopted and submitted to the Department, pursuant to Government Code Section 65585.

3. *The General Plan amendment is not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.* An Initial Study was done by the Planning and Development Services Department and reviewed by the Environmental Evaluation Committee on July 15, 2021 and by the Planning Commission on September 22, 2021 and the determination of a Negative Declaration with no significant impacts was made.

4. *The General Plan amendment is not likely to cause serious health problems.* An Initial Study was done by the Department of Planning and Development Services and reviewed by the Environmental Evaluation Committee on July 15, 2021 and by the Planning Commission on September 22, 2021 and the determination of a Negative Declaration with no significant impacts was made.

5. *There will be no adverse impacts upon wildlife or natural resources, and no intrusion upon any known habitat, nor is it likely to have a future impact.* An Initial Study was done by the Planning and Development Services Department and reviewed by the Environmental Evaluation Committee on July 15, 2021 and by the Planning Commission on September 22, 2021 and the determination of a Negative Declaration with no significant impacts was made.

NOW THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

1. Make the De Minimus finding that the project will not individually or cumulatively have an adverse effect on Fish and Wildlife resources, as defined in Section 711.2 of the Fish and Game Code.

2. Approve the update to "Housing Element for the period of 2021-2029" as Amended and approve of the General Plan Amendment #20-0004.

Jesus Eduardo Escobar, Chairman
Board of Supervisors, County of Imperial

I hereby certify that the preceding resolution was taken by the Board of Supervisors at a meeting conducted on February 8, 2022 by the following vote:

AYES: **Escobar, Plancarte, M. Kelley, Castillo**

NOES: **None**

ABSENT: **R. Kelley**

ABSTAIN: **None**

ATTEST:

Blanca Acosta
Clerk of the Board of Supervisors
County of Imperial

BOS ADOPTED: 02-08-22
M.O. #20a

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, TO ADOPT THE NEGATIVE DECLARATION FOR "GENERAL PLAN AMENDMENT (GPA) #20-0004" FOR THE GENERAL PLAN HOUSING ELEMENT UPDATE (2021-2029).

RESOLUTION NO. 2022-16

WHEREAS, on July 2, 2021, a publication was made in a newspaper of greatest circulation advising of the Environmental Evaluation Committee hearing scheduled for July 15, 2021;

WHEREAS, a Negative Declaration and CEQA findings were prepared in accordance with the requirements of the California Environmental Quality Act, State Guidelines, and the County's "Guidelines and Regulations to Implement CEQA, as Amended;"

WHEREAS, the Environmental Evaluation Committee recommended the adoption of the Negative Declaration for the General Plan Amendment (GPA) #20-0004 Housing Element Update (2021-2029);

WHEREAS, the Negative Declaration was circulated from July 20, 2021 through September 2, 2021; and

WHEREAS, the Board of Supervisors of the County of Imperial has been designated with the responsibility of adoptions and certifications.

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

The Board of Supervisors has reviewed the attached Negative Declaration (ND) prior to making a decision to approve the Negative Declaration (IS#20-0040) for the General Plan Amendment (GPA) #20-0004 Housing Element Update (2021-2029). The Board of Supervisors finds and determines that the Negative Declaration is adequate and prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA), which analyzes the project's environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein is true, correct, and valid;

2. That the Board of Supervisors has reviewed the attached Negative Declaration for the General Plan Amendment (GPA) #20-0004 Housing Element Update (2021-2029), considered the information contained in the Negative Declaration together with any comments received during the public review period and prior to approving the General Plan Amendment (GPA) #20-0004 Housing Element Update (2021-2029);

3. That the project will not individually or cumulatively have an adverse effect on fish and wildlife resources, as defined in Section 711.2 of the Fish and Game Code;

4. That the Negative Declaration reflects the Board of Supervisors independent judgment and analysis.

NOW, THEREFORE, the County of Imperial Board of Supervisors **DOES HEREBY APPROVE** of the Imperial County General Plan Amendment (GPA) #20-0004 Housing Element Update (2021-2029).

1. Make the De Minimus finding that the project will not individually or cumulatively have an adverse effect on Fish and Wildlife resources, as defined in Section 711.2 of the Fish and Game Code.

2. Approve the update to "Housing Element for the period of 2021-2029" as Amended and approve of the General Plan Amendment #20-0004.

Jesus Eduardo Escobar, Chairman
Board of Supervisors, County of Imperial

I hereby certify that the preceding resolution was taken by the Board of Supervisors at a meeting conducted on February 8, 2022 by the following vote:

AYES: **Escobar, Plancarte, M. Kelley, R. Kelley, Castillo**

NOES: **None**

ABSENT: **None**

ABSTAIN: **None**

ATTEST:

Blanca Acosta
Clerk of the Board of Supervisors
County of Imperial