

# 2013-2021 HOUSING ELEMENT

## *APPENDICES*



EQUAL HOUSING  
OPPORTUNITY

**APPENDIX A**

**HOUSING NEEDS, SITES,  
CONSTRAINTS & PROGRESS**

**City of Calexico**

**2013-2021 Housing Element of the General Plan  
Appendix A  
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## A. INTRODUCTION

Technical Appendix A provides information on the following required components of a housing element:

- Housing Needs Assessment
- Sites Inventory and Analysis
- Housing Market Constraints Analysis
- Governmental Constraints Analysis
- Implementation Progress

The Housing Needs Assessment (pages A-3 to A-23) discusses:

- Existing Needs (housing condition, cost burdened, crowding, at risk housing)
- Special Needs (elderly, disabled, large families, farmworkers, female householders, and homeless)
- Projected Needs (new construction)

The Sites Inventory and Analysis (pages A-23 to A-30) describes the sites that can accommodate the need for lower-income, moderate-income and above moderate-income housing.

The Housing Market Constraints Analysis (A-31 to A-39) describes the following components of housing costs:

- Land
- Construction
- Financing
- Sales prices and monthly rents

The Governmental Constraints Analysis (A-40 to A-55) describes actual and potential constraints on housing production and improvement such as:

- Land use controls
- Building codes and their enforcement
- Site improvements
- Fees and exactions required of developers
- Local processing and permit procedures
- Constraints on housing for persons with disabilities
- Constraints on meeting regional share housing needs

The Progress Report (A-55 to A-61) describes the progress the City has made toward implementation of the *2008-2014 Housing Element*.

## B. HOUSING NEEDS ASSESSMENT

### 1. INTRODUCTION AND SUMMARY

In addition to the Introduction and Summary, the Housing Needs Assessment describes the following:

- Part 2 - *housing characteristics* including the number and types of housing units and the condition of housing.
- Part 3 – *household characteristics* including the number of households, level of payment compared to ability to pay, and overcrowding.
- Part 4 - an analysis of existing *affordable housing developments at risk of converting to market rate housing* during the next 10 years.
- Part 5 - an analysis of *special housing needs* experienced by populations such as the elderly; persons with disabilities including those with developmental disabilities; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter.
- Part 6 - an analysis of *population and employment trends* and of *projections* of existing and projected housing needs for all income levels. The existing and projected needs include the City's *share of the regional housing need*.

A summary of the key findings is provided below:

#### Housing and Household Characteristics and At-Risk Housing

- 10,791 housing units comprise the existing housing stock
- Single-family detached homes comprise about two thirds (67.9%) of the existing housing stock
- 2,600-2,800 housing units need rehabilitation and 10-20 need replacement
- Of the 10,116 occupied housing units, 5,430 (53.7%) are owner-occupied and 4,686 (46.3%) are renter occupied (2010 Census)
- 3,664 lower income households are cost burdened and 2,130 are severely cost burdened
- More lower-income renters (2,240) than owners (1,424) experience housing costs more than they can afford.
- 1,297 households are overcrowded and renters comprise the majority of crowded households
- 337 affordable apartment units are at-risk of converting to market rate housing

#### Special Housing Needs

- 11% of elderly owners (154/1,353) and 34% of elderly renters (485/1,443) are cost burdened – that is, paying more than they can afford for housing
- About 4,950 disabled persons live in Calexico
- The elderly have the highest rate of disabilities as 50.2% of all people 65 years of age or older report one or more disability

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- 227 developmentally disabled residents are served by the San Diego Regional Center
- 23% of the large family owners (470/2,027) and 26% of large family renters (340/1,324) are cost burdened
- 742 farm workers live in Calexico, which is almost one-fourth of all the Imperial County farmworkers
- About 3,162 female householders live in Calexico, which is slightly less than one third (31.3%) of all the City's householders
- About 2,319 female householders live with a family and 746 live alone.
- Calexico has about 40 homeless persons, a number which includes the chronically homeless

### Projected Housing Needs

- SCAG's 2012 RTP Forecast shows an increase of 4,000 households between 2008 and 2020
- SCAG's 2012 RTP Forecast shows an increase in employment of 6,300 jobs between 2008 and 2020.
- 3,224 housing units is Calexico' share of the regional housing need, which includes 1,306 units for lower income households

## 2. HOUSING CHARACTERISTICS

This part provides information on –

- Existing Housing Stock by Occupancy Status
- Numbers and Types of Housing Units

### a. Existing Housing Stock by Occupancy Status

As of January 1, 2013, 10,791 dwellings comprise the housing stock, which is –

- An increase of 3,808 housing units since the April 2000 Census
- An increase of 140 housing units since the April 2010 Census

As of January 1, 2013, 10,249 housing units were occupied and 538 dwellings were vacant, representing a 5% vacancy rate. Table A-1 reports the detailed statistics.

### b. Numbers and Types of Units

The number and type of housing units as of January 1, 2013 is essentially the same as in April 2010. Single-family detached homes comprise just over two thirds of the housing stock. Housing units in multi-family structures of five or more dwellings comprise about 15% of the housing stock. Table A-2 shows the numbers and types of housing units in 2000, 2010 and 2013.

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**Table A-1  
City of Calexico  
Housing Stock by Occupancy Status  
April 2000, April 2010 and January 2013**

Occupancy Status	Number of Housing Units 2000	Number of Housing Units 2010	Number of Housing Units 2013
Occupied	6,814	10,116	10,249
Vacant	169	535	542
Total	6,983	10,651	10,791
Percent Vacant	2.4%	5.0%	5.0%

Source: Census 2000 Summary File 1 (SF 1), DP-1 Demographic Profile, Housing Occupancy  
2010 Census Summary File 1, DP-1 Demographic Profile, Housing Occupancy  
State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2013 with 2010 Benchmark* Sacramento, California, May 2013  
Table construction by Castañeda & Associates

**Table A-2  
City of Calexico  
Housing Stock by Type of Unit  
April 2000, April 2010 and January 2013**

Type of Unit	Number of Units					
	2000	Percent	2010	Percent	2013	Percent
1 unit, detached	4,466	63.9%	7,087	66.5%	7,326	67.9%
1 unit, attached	439	6.3%	565	5.3%	486	4.5%
2 to 4 units	888	12.7%	1,359	12.8%	1,158	10.7%
5+ units	986	14.1%	1,473	13.8%	1,651	15.3%
Mobile homes, Boat, RV, Van, Etc.	205	2.9%	167	1.6%	170	1.6%
Total	6,984	100.0%	10,651	100.0%	10,791	100.0%

Note: According to the State Department of Finance, American Community Survey (ACS) data were used to distribute 2010 census housing units into the standard housing types (single detached units, single attached units, two to four units, five plus or apartment units, and mobile homes). Housing units are estimated by adding new construction and annexations and subtracting demolitions and conversions starting from the 2010 benchmark or based on the prior year's estimate.

Source: Census 2000 Summary File 3 (SF 3), Table H030 Units in Structure  
2008-2010 American Community Survey (ACS) 3-Year Estimates, Table B25024 Units in Structure.  
State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2013 with 2010 Benchmark* Sacramento, California, May 2013  
Table construction by Castañeda & Associates

**c. Condition of the Existing Housing Stock**

The condition of housing refers to housing in the following states:

- Sound
- In need of minor, moderate or substantial repairs
- Dilapidated

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Housing rehabilitation needs encompass all dwellings in need of minor, moderate or substantial repairs. Dilapidated housing is beyond reasonable repairs and needs to be replaced.

In 2007, a housing condition survey was conducted to evaluate housing in terms of its foundation, roofing, siding, windows and electrical. Each housing structure was rated as being in sound or dilapidated condition, or in need of minor, moderate, or substantial repairs. Table A-3 shows that the condition of almost 9,300 housing units was evaluated. Single-family and multi-family housing comprise the vast majority of the housing units surveyed. Almost 70% of the total housing stock surveyed was in sound condition. Duplexes had the lowest percentage of housing in sound condition.

**Table A-3  
City of Calexico  
Condition of the Housing Stock**

Condition	Single Family		Duplex		Triplex	
	Number	Percent	Number	Percent	Number	Percent
Sound	5,188	72.6%	48	24.5%	87	72.5%
Minor	1,500	21.0%	80	40.8%	30	25.0%
Moderate	422	5.9%	68	34.7%	3	2.5%
Substantial	21	0.3%	0	0.0%	0	0.0%
Dilapidated	14	0.3%	0	0.0%	0	0.0%
Total	7,145	100.0%	169	100.0%	120	100.0%
	Multi-Family		Mobile Homes		Total	
	Number	Percent	Number	Percent	Number	Percent
Sound	1,000	62.2%	145	75.1%	6,468	69.8%
Minor	490	30.5%	35	18.1%	2,135	23.1%
Moderate	117	7.3%	7	3.6%	617	6.7%
Substantial	0	0.0%	6	3.1%	27	0.3%
Dilapidated	0	0.0%	0	0.0%	14	0.1%
Total	1,607	100.0%	193	100.0%	9,261	100.0%

Source: 2007 Housing Condition Survey

Since 2007, some housing units have been repaired by their owners or through City code enforcement and housing rehabilitation programs. And other housing units may have deteriorated so that they need rehabilitation. Consequently, the 2007 survey remains a reliable indicator of housing units in need of rehabilitation or replacement. Based on the estimates shown in Table A-4, the housing rehabilitation need is most likely between 2,600 to 2,800 housing units. The housing replacement need most likely is between 10 and 20 housing units.

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**Table A-4  
City of Calexico  
Housing Rehabilitation and Housing Replacement Needs**

Unit Type	Housing Rehabilitation Needs <sup>1</sup>	Housing Replacement Needs <sup>2</sup>
Single Family	1,943	14
Duplex	148	0
Triplex	33	0
Multi-Family	607	0
Mobile Homes	48	0
Total	2,779	14

<sup>1</sup>Includes housing units in need of minor, moderate or substantial repairs

<sup>2</sup>Includes housing units in dilapidated condition

Source: 2007 Housing Condition Survey

### 3. HOUSEHOLD CHARACTERISTICS

This part examines the following household characteristics:

- Tenure – owners and renters
- Level of payment compared to ability to pay
- Overcrowding

#### a. Tenure – Owners and Renters

Tenure refers to whether housing units are occupied by owners or renters. Census 2010 reports 10,116 occupied housing units – 5,430 owners (53.7%) and 4,686 renters (46.3%). Table A-5 shows that younger (<35 years) and older (>65) households are predominantly renters. In contrast, households 35 to 64 years of age are primarily owners.

**Table A-5  
City of Calexico  
Tenure by Age of Householder-2010**

Age of Householder	Owner	Percent	Renter	Percent	Total	Percent
15 to 24 years	80	31.6%	173	68.4%	253	2.5%
25 to 34 years	579	44.2%	730	55.8%	1,309	12.9%
35 to 44 years	1,257	56.9%	954	43.1%	2,211	21.9%
45 to 54 years	1,427	61.3%	901	38.7%	2,328	23.0%
55 to 64 years	1,049	60.2%	693	39.8%	1,742	17.2%
65 years and over	1,038	45.7%	1,235	54.3%	2,273	22.5%
Total	5,430	53.7%	4,686	46.3%	10,116	100.0%

Source: Census 2010, Summary File 1, Table QT-H2: Tenure, Household Size and Age of Householder  
Table construction by Castañeda & Associates

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**b. Level of Payment Compared to Ability to Pay**

Level of payment compared to ability to pay measures the number and percentage of households who are paying more than they can afford for housing. This problem is referred to as “overpaying” or “cost burdened.” For lower income households, overpaying occurs when they pay 30% or more of their income on housing costs. “Severe” overpaying is when lower income households spend 50% or more of their income on housing costs.

1. 2013 Income Limits for Income Groups

Table A-6 shows the 2013 household income limits for four income groups, adjusted by household size –

- Extremely low income: <30% of the Imperial County median household income
- Low income: 30%-50% of the Imperial County median household income
- Low income: 50%-80% of the Imperial County median household income
- Moderate income: 80%-120% of the Imperial County median household income

**Table A-6  
Imperial County  
2013 Annual Income Limits Adjusted by Household Size**

Household Size (# of persons)	Extremely Low Income	Very Low Income	Low Income	Moderate Income
1 person	\$12,150	\$20,300	\$32,450	\$48,650
2 persons	\$13,900	\$23,200	\$37,050	\$55,600
3 persons	\$15,650	\$26,100	\$41,700	\$62,550
4 persons	\$17,350	\$28,950	\$46,300	\$69,500
5 persons	\$18,750	\$31,300	\$50,050	\$75,050
6 persons	\$20,150	\$33,600	\$53,750	\$80,600
7 persons	\$21,550	\$35,900	\$57,450	\$86,200
8 persons	\$22,950	\$38,250	\$61,150	\$91,750

Source: State Department of Housing and Community Development, State Income Limits for 2013, February 25, 2013

Table A-7 shows the annual income and monthly income limits for a 4-person household in each of the four income groups. For instance, the monthly income limit of a low income 4 person household ranges between \$2,412 and \$3,858.

The income limits are important because they determine eligibility for programs that provide financial assistance to owners and renters.

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**Table A-7  
Imperial County: Annual and Monthly for a 4-Person Household**

Income Group	Income Limits	Monthly Income
Extremely Low	less than \$17,350	less than \$1,445
Very Low	\$17,351-\$28,950	\$1,445-\$2,412
Low	\$28,951-\$46,300	\$2,412-\$3,858
Moderate	\$46,301-\$69,500	\$3,858-\$5,791

Source: Table A-6  
Table construction by Castañeda & Associates

2. Cost Burdened and Severely Cost Burdened Owners and Renter.

Overpaying is often cited as one of the major problems confronting the lower income (<80% AMI) population. Table A-8 shows the total number of households and the number cost burdened and severely cost burdened by income group and household type.

**Table A-8  
City of Calexico  
Cost Burdened Households by Income Level and Household Type**

Household Type/Income Level/Cost Burden	Small Related	Large Related	Elderly	Other	Total Cost Burdened	Percent Cost Burdened	Total Households by Income
<b>Renters Cost Burden &gt;30%</b>							
0-30% AMI	630	195	300	70	1,195	84.8%	1,410
30-50% AMI	350	85	170	115	720	74.2%	970
50-80% AMI	250	60	15	-	325	32.5%	1,000
All Households	1,280	375	485	225	2,365	56.0%	4,225
<b>Renters Cost Burden &gt;50%</b>							
0-30% AMI	480	195	145	70	890	63.1%	1,410
30-50% AMI	150	35	35	30	250	25.8%	970
50-80% AMI	65	-	15	-	80	8.0%	1,000
All Households	695	230	195	100	1,220	28.9%	4,225
<b>Owners Cost Burden &gt;30%</b>							
0-30% AMI	145	80	64	15	304	89.4%	340
30-50% AMI	200	155	40	25	420	71.8%	585
50-80% AMI	335	235	50	80	700	66.4%	1,055
All Households	1,205	775	324	150	2,454	46.0%	5,335
<b>Owners Cost Burden &gt;50%</b>							
0-30% AMI	120	80	20	15	235	69.1%	340
30-50% AMI	170	155	25	10	360	61.5%	585
50-80% AMI	180	35	20	80	315	29.9%	1,055
All Households	535	280	90	105	1,010	18.9%	5,335

Source: Source: HUD User Website, CPD Data, City of Calexico, 2006-2010 CHAS.  
Table construction by Castañeda & Associates

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In summary:

- There are a total of 1,750 extremely low income renter and owner households (1,410 + 340) of which 1,499 (1,195 + 304) are cost burdened (>30%). More than eight of every ten ELI renters are cost burdened.
- There are a total of 1,555 very low income renter and owner households (970 + 585) of which 1,140 (720 + 420) are cost burdened (>30%). Nearly three-fourths of very low income renters are cost burdened.
- There are a total of 2,055 low income renter and owner households (1,000 + 1,055) of which 1,025 (325 + 700) are cost burdened (>30%). About one-third of the low income renters are cost burdened.
- There are a total of 5,360 lower income (<80% AMI) renter and owner households of which 3,664 are cost burdened (>30%). Almost two-thirds of all lower income renters are cost burdened.
- There are a total of 9,560 (4,225 + 5,335) households of which 4,819 are cost burdened (50%).

Cost burdened renters can be assisted by the Calexico Housing Authority's Section 8 Housing Choice Voucher Program, City tenant based rental assistance when available, and the affordable rental housing stock. Calexico has 23 affordable housing developments offering apartment units for seniors, large families, small families and other household types.

### c. Overcrowding

Overcrowding is one result of the shortage of interior living space. Overcrowding reflects the financial inability of households to buy or rent housing units having enough space for their needs. Consequently, overcrowding is considered a household characteristic instead of a housing structural condition. An "overcrowded" housing unit does not necessarily imply one of inadequate physical condition; rather, with fewer persons it becomes "uncrowded". Overcrowding also may be a temporary situation since some households will move to larger housing units to meet space requirements.

CHAS data provides estimates of the number of occupants per room based on the 2005-2009 American Community Survey (ACS). The following Census Bureau definitions apply:

Occupants per room is obtained by dividing the number of people in each occupied housing unit by the number of rooms in the unit. The figures show the number of occupied housing units having the specified ratio of people per room. Although *the Census Bureau has no official definition of crowded units*, many users consider units with more than one occupant per room to be crowded. [Emphasis added]

For each unit, rooms include living rooms, dining rooms, kitchens, bedrooms, finished recreation rooms, enclosed porches suitable for year-round use, and lodger's rooms. Excluded are strip or pullman kitchens, bathrooms, open porches, balconies, halls or foyers, half-rooms, utility rooms, unfinished attics or basements, or other unfinished space used for storage. A partially divided room is a separate room only if there is a partition from floor to ceiling, but not if the partition consists solely of shelves or cabinets.

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Table A-9 estimates about 1,300 crowded households. Of this total, about 87% are “crowded” and 13% are “severely crowded.” Crowded households are an indicator of the need for an increase in the number of 3-bedroom apartment units and bedroom additions to owner occupied housing.

**Table A-9  
City of Calexico  
Crowding (Households with More than  
One Occupant per Room) by Tenure**

Income	Owner	Renter	Total
1.01 to 1.50 occupants per room	534	592	1,126
1.51 or more occupants per room	107	64	171
<b>Total</b>	<b>641</b>	<b>656</b>	<b>1,297</b>

Source: U.S. Department of Housing and Urban Development, 2005-2009 CHAS (Comprehensive Housing Affordability Strategy)  
Table construction by Castañeda & Associates

**4. AT-RISK HOUSING ASSESSMENT**

**a. At-Risk Inventory**

At-risk housing refers to affordable rental housing that may convert to market rate housing between 2013 and 2023. Table A-10 shows that 337 rental housing units located in seven apartment communities are at-risk of conversion to market rate housing.

**Table A-10  
City of Calexico  
Inventory of Affordable Rental Housing at Risk  
of Converting to Market Rate Housing**

Apartment Community	Number of Affordable Units	Type of Financing
Calexico Village	36	USDA 515
Casa Imperial	48	USDA 515
Casa Sonoma	48	USDA 515
Casa Sonoma II	20	USDA 515
Villa Del Este	100	USDA 515
Calexico Gardens	39	HUD 221
Casa Del Retiro	46	HUD 221
<b>Total</b>	<b>337</b>	

Source: California Housing Partnership Corporation and Southern California Association of Governments, *Local Housing Element Assistance: Existing Housing Needs Data Report, City of Calexico*

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

The process of converting affordable housing to market rate housing is a difficult and lengthy process, which requires notices to tenants, local government, local housing authorities and qualified entities. State notice requirements apply to any multifamily rental housing development that receives governmental assistance from specific housing programs including the two listed below:

- Section 221(d)(3) Below-Market-Interest-Rate Mortgage Insurance Program of the National Housing Act;
- Section 515 of the Housing Act of 1949, as amended

Table A-11 summarizes the State notice requirements.

**Table A-11  
State Preservation Notice Requirements  
Pursuant to Government Code Sections 65863.10, 65863.11, and 65863.13**

Type of Notice	When	Parties
Intent to Prepay, Terminate, or Expiration of Subsidies	6 and 12 Months	Tenants Affected Public Agencies
Opportunity to Submit a Purchase Offer	12 Months	Qualified Entities
Notice to Affected Public Agencies	6 Months	Affected Public Agencies
Notice of Any Changes	Within 7 business days of any change	Tenants

**b. Cost Analysis**

The cost analysis involves estimates of the costs to preserve or replace the affordable housing units in the event all were converted to market rate housing.

A cost estimate to preserve the housing is difficult to establish because of many unknown factors. Preservation could occur by providing tenant based rental assistance in 337 housing units located in Calexico. Preservation by means of rental assistance would annually cost an estimated \$2,022,000 based on average monthly subsidy of \$500 ( $\$500 \times 12 = \$6,000 \times 337 = \$2,022,000$ ).

Preservation by means of acquisition and rehabilitation of the at-risk housing units is estimated to cost \$60,120,800 based on assumed cost of \$178,400 per housing unit ( $\$178,400 \times 337 = \$60,120,800$ ).

Replacement by means of new construction is estimated to cost \$80,162,190 based on average per unit cost of \$237,870 ( $\$237,870 \times 337 = \$80,162,190$ ).

(The per unit new construction cost is based on the least costly tax credit project costs. The per unit acquisition and rehabilitation cost is based on 75% of the new construction cost. Source: California Tax Credit Allocation Committee, *Cost Containment and the LIHTC Program*, July 2011 Public Forums.)

**c. Preservation Resources**

Efforts by the City to retain low-income housing must be able to draw upon two basic types of preservation resources: organizational and financial. Qualified, non-profit entities need to be made aware of the future possibilities of units becoming “at-risk”. Should a property become “at-risk” the City maintains a list of qualified entities that may have an interest in preserving that property.

In addition, the City of Calexico will develop procedures for monitoring and preserving at-risk units, which will include:

- Monitoring the Risk Assessment report published by the California Housing Partnership Corporation (CHPC).
- Maintain regular contact with the local HUD and USDA offices regarding early warnings of possible opt-outs.
- Maintain contact with the owners and managers of existing affordable housing to determine if there are plans to opt-out in the future, and offer assistance in locating eligible buyers.
- Develop and maintain a list of potential purchasers of at-risk units and act as a liaison between owners and eligible purchasers.
- Ensure that all owners and managers of affordable housing have access to applicable State and federal laws regarding notice to tenants of the owner’s desire to opt-out or prepay.

The following is a list of potential financial resources considered a part of the City’s overall financial plan to deal with retaining affordable units. The number and availability of programs to assist cities and counties in preserving their affordable housing stock is limited, and public funding for new projects is unpredictable. The following is a list of current local, state and federal programs.

- HOME Investment Partnerships (HOME) Program
- Calexico Housing Authority is a Public Housing Authority whose jurisdiction includes only the City. It administers federal and state funds for its public housing projects and government assisted housing units such as the Section Housing Choice Voucher Program (rental assistance).
- Low-income Housing Tax Credit Program (LIHTC) - The LIHTC Program provides for federal and state tax credits for private and non-profit developers and investors who agree to set aside all or an established percentage of their rental units at affordable rent levels. These tax credits may also be utilized on rehabilitation projects, contributing to the preservation of at-risk housing.
- Preservation Financing Program, operated through California Housing Finance Agency (CHFA), offers tax-exempt financing for the acquisition or refinancing of a project with an expiring Section 8 contract.

The State Department of Housing and Community Development maintains a list of Qualified Entities who are interested in purchasing government-subsidized multifamily projects. The Imperial County list includes seven entities that state they possess the legal and managerial capacity to acquire, preserve, and manage the at-risk Calexico. The Calexico Community Action Council, Inc. is on HCD list of Qualified Entities. The Calexico Housing Authority is an entity that has the expertise to acquire, preserve and manage the at-risk housing units.

## 5. SPECIAL HOUSING NEEDS

Special housing needs refer to the needs of populations such as:

- Elderly
- Persons with disabilities
- Persons with developmental disabilities
- Large families
- Farmworkers
- Families with female heads of household
- Families and persons in need of emergency shelter

### a. Elderly

The special housing needs of seniors are unique because of the aging process. Additionally, elderly housing needs vary because of age, gender, race/ethnicity, health, tenure and economic status.

The special housing needs that the elderly potentially experience include, but are not limited, to:

- Affordable housing
- Units with accessibility modifications
- Units with special accommodations for live-in caretakers
- Housing developments that provide on-site supportive services
- Assistance in locating housing or in securing shared housing
- Housing located near transportation, shopping and medical services

The Imperial County *Area Agency on Aging Plan* shows the following as housing related priorities:

- Priority #2 Safety/home maintenance, modifications, repair
- Priority #4 Utilities/energy costs
- Priority #7 Housing

According to the Plan:

Housing, safety/home maintenance and services for seniors have ranked high in the concerns for seniors. Utilities costs also have an impact on seniors, which is listed as one of the top needs. Utilities most directly relate to the use of air conditioners in this area, and as such, the AAA has coordinated efforts with Campesinos Unidos, a community service provider, for assistance with emergency utility assistance with utility companies such as the Imperial Irrigation District (power), the Gas Company, and the City Water Departments.

Staff at the Area Agency on Aging described the following needs:

- People are reluctant to apply for home modifications and repairs because they do not want to take on more debt.
- The Agency has limited funds to assist with emergency turn-on/turn-off of utilities.
- The Agency provides three months of rental assistance and then refers the clients to the County or a city. About 20 households are assisted each month.

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

- There seems to be a steady increase in the numbers of elderly requesting assistance.
- The types of housing most needed include:
  - ✓ Energy efficient
  - ✓ Handicapped accessible (as the elderly get older grab bars and walk-in showers are important)
  - ✓ Garden homes with minimal upkeep would enable more seniors to age in place

Staff at the Calexico Senior Center described the following needs:

- Seniors want showers instead of tubs.
- Need for solar panels and insulation.
- Need for small homes with low maintenance yards, not apartments.
- The elderly age-in-place as they have limited opportunities to move.

According to the 2010 Census, there almost 3,000 elderly households (62+ years of age) –

- 1,353 owners
- 1,443 renters

Table A-12 shows the number of cost burdened elderly households by tenure and three income groups.

**Table A-12  
City of Calexico  
Cost Burdened Elderly Households by Income and Tenure**

Income Group	Owners	Renters	Total
Extremely Low (0-30%)	64	300	364
Very Low (31-50%)	40	170	210
Low (51-80%)	50	15	65
<b>Total</b>	<b>154</b>	<b>485</b>	<b>639</b>

Source: Source: Source: HUD User Website, CPD Data, Calexico, 2006-2010 CHAS and Table A-8  
Table construction by Castañeda & Associates

As noted above, the HUD CHAS data estimates that 639 elderly households are cost burdened - 154 owners and 485 renters.

About 11% of elderly owners (154/1,353) are cost burdened. While 154 elderly owners are overpaying, there are no ongoing programs to provide monthly financial assistance to such owners. Some homeowners may benefit from financial counseling

About 34% of elderly renters (485/1,443) are cost burdened. Rental housing assistance for elderly renters is available from the Section 8 Housing Choice Voucher Program which is administered by the Calexico Housing Authority. Additionally, the City's affordable housing inventory includes eight senior projects having a total of 557 apartment units.

**b. Persons with Disabilities**

Some key special housing needs may include:

- Affordable housing
- Units with accessibility modifications
- Units with special accommodations for live-in caretakers
- Housing developments that provide supportive services
- Units accessible to public transportation
- Assistance in locating housing or in securing shared housing
- Housing with design features that facilitate mobility and independence

The majority of housing units in most communities lack features such as ramps, extra wide doors, raised toilets, hand rails, lowered counters, or slip-resistant floors that would make them suitable for, or readily adaptable, to people with mobility limitations and people using assistive technology. The majority of existing dwellings are inaccessible to people with a mobility impairment.

The 2010 American Community Survey asks respondents about six different types of disabilities:

- Hearing difficulty – “deaf or [had] serious difficulty hearing.”
- Vision difficulty – “blind or [had] serious difficulty even when wearing glasses.”
- Cognitive difficulty – “serious difficulty concentrating, remembering, or making decisions.”
- Ambulatory difficulty – “serious difficulty walking or climbing stairs.”
- Self-care difficulty – “difficulty dressing or bathing.”
- Independent living difficulty – “difficulty doing errands alone such as visiting a doctor’s office or shopping.”

About 4,950 disabled persons live in Calexico. The elderly have the highest rate of disabilities as 50.2% of all people 65 years of age or older report one or more disability. Table A-13 shows the number and percentage of disabled persons by age group.

Disabled householders could benefit from programs that provide assistance to retrofit their homes. As noted above, the *Area Agency on Aging Plan* found that seniors consider “safety/home maintenance, modifications, repair” as their #2 priority. And in Calexico seniors comprise 45% of all disabled persons (2,213/4,946).

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-13  
City of Calexico  
Disability Status of Civilian Non-institutionalized  
Population by Age Group – April 2010**

Age Group	Total Population	Disabled Population	Percent Disabled
< 5 years	2,986	63	2.1%
5-17 years	9,025	433	4.8%
18-64 years	22,153	2,237	10.1%
65 years +	4,408	2,213	50.2%
Total	38,572	4,946	12.8%

Note: Total population per 2010 Census is 38,572 with zero institutionalized persons residing in Calexico.

Sources: 2010 Census Summary File 1, Table P12 Sex by Age (total population by age group)

2010 Census Summary File 1, Table QT-P13 Group Quarters Population by Sex, Age, and Type of Group Quarters: 2010 (institutionalized population by age group)

American FactFinder, U.S. Census Bureau, *2010 American Community Survey 3-Year Estimates, Table S1810, Disability Characteristics*

**c. Persons with Developmental Disabilities**

According to Section 4512 of the Welfare and Institutions Code a "Developmental disability" means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, but shall not include other handicapping 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 State Department of Developmental Services (DDS) currently provides community based services to approximately 243,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The San Diego Regional Center (SDRC), which serves Calexico, is a point of entry to services for residents with developmental disabilities. SDR is a service of San Diego-Imperial Counties Developmental Services, Inc. About 0.59 percent of California's population is served by the DDS. This percentage applied to Calexico's population yields an estimate of 227 residents who could be served by the SDRC.

## **APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

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The SDRC provides a variety of services to persons with developmental disabilities, their families, and the community. These services include:

Assessment: Assessments are provided following the initial application for services, during the intake and assessment period. These are done for the purpose of establishing eligibility for Regional Center services, and also to provide the basis for an initial Individual Program Plan for eligible consumers.

Individual Program Plan (IPP) or Individual Family Service Plan (IFSP): After an individual is found to be eligible for Regional Center services and needs are identified, a written plan is developed. This plan is called the Individual Program Plan (IPP) or Individual Family Service Plan (IFSP) for children 0-3 years of age. Both include goals and objectives designed to meet client/family needs.

Case Management Services: The primary goal of the San Diego Regional Center is to provide support services that allow the consumer to live as independently as possible. To achieve this goal, service coordinators assist the consumer in securing needed services through referral or purchase, by coordinating service programs, and by advocating for provision of services through other community agencies.

Purchase of Services: In securing services and supports, the Planning Team considers natural supports and community agencies. The Regional Center may purchase services that are necessary and not available through other organizations, which may include:

- Adult Day Programs
- Behavioral Training
- Independent Living Services
- Infant Programs and Services
- Licensed Residential Placement (parental reimbursement fees may be required for minors)
- Respite Services
- Supported Employment
- Supported Living Services
- Transportation to Work/Day Program

Community Services: Public information, community education and the development of needed resources are provided by the staff of the SDRC.

There are a number of housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group.

Section 2 – Housing Program - describes a program to address the needs of developmentally disabled persons.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**d. Large Families**

HCD defines large families as consisting of five or more persons. Lower income, large families need three, four or five bedroom housing units at affordable costs. Since housing with these numbers of bedrooms usually command higher costs than smaller units, affordability is another key need of large families/households. Table A-14 shows the number of large family households by household size and tenure.

**Table A-14  
City of Calexico: Large Families by Tenure - 2010**

Large Families	Owners	Percent	Renter	Percent	Total	Percent
5 Persons	963	59.4%	657	40.6%	1,620	48.3%
6 Persons	510	59.9%	342	40.1%	852	25.4%
7 Persons+	554	63.0%	325	37.0%	879	26.2%
Total	2,027	60.5%	1,324	39.5%	3,351	100.0%

Source: American FactFinder, Census 2010, Summary File 1, Table H16: Tenure by Household Size. Table construction by Castañeda & Associates

According to the 2010 Census, there are 3,351 large family households – 2,027 owners and 1,324 renters. Table A-15 shows the number of cost burdened large family households by tenure and income group. The HUD CHAS data estimates that 810 large family households are cost burdened – 470 owners and 340 renters.

**Table A-15  
City of Calexico  
Cost Burdened Large Families by Tenure and Income Group**

Income Group	Owners	Renters	Total
Extremely Low (0-30%)	80	195	275
Very Low (31-50%)	155	85	240
Low (51-80%)	235	60	295
Total	470	340	910

Source: Source: Source: HUD User Website, CPD Data, Calexico, 2006-2010 CHAS and Table A-8. Table construction by Castañeda & Associates

**e. Farmworkers**

HCD guidance indicates that a housing element should estimate the number of permanent and migrant farmworkers within the community. A farm worker is --

- A person who performs manual and/or hand tool labor to plant, cultivate, harvest, pack and/or load field crops and other plant life.
- A person who attends to live farm, ranch or aquacultural animals including those produced for animal products.

[Source: State of California, Employment Development Department, Labor Market Information Division Occupational Definition]

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

Because of their predominantly low incomes, housing affordability is an acute need for farmworkers.

Using recent American Community Survey data, the Southern California Association of Governments (SCAG) has estimated the number of Imperial County farm workers by place of residence. Table A-16 shows that 742 farm workers live in Calexico, which is almost one-fourth of all the Imperial County farmworkers.

**Table A-16**  
**Imperial County: Farm Workers by Place of Residence**

City	Male Farm Worker	Female Farm Worker	Total	Percent Distribution
Brawley	615	71	686	21.7%
Calexico	500	242	742	23.4%
Calipatria	111	18	129	4.1%
El Centro	314	189	503	15.9%
Holtville	127	0	127	4.0%
Imperial	135	10	145	4.6%
Unincorporated	564	171	735	23.2%
Westmorland	84	13	97	3.1%
County Total	2,450	714	3,164	100.0%

Source: 2005-2009 American Community Survey and Southern California Association of Governments

Table construction by Castañeda & Associates

The *housed* “farmworkers” who reside in the City live in a household and occupy a housing unit. Therefore, they would be among the existing households counted as part of the CHAS housing needs, and estimates of existing and projected housing needs produced by SCAG. That is, the resident farmworker housing needs would be counted as part of the lower income households experiencing problems of overpaying, overcrowding, and living in substandard housing.

Because the City’s farm worker population is small, the housing needs of this group are addressed through its standard affordable housing strategies. The Calexico Family Apartments II (Chelsea Investment Corp.) offers 80 multi-family rental units targeted to the farm worker population. A second rental community provides additional farmworker housing.

### **f. Female Householders**

Some important housing needs of female householders include:

- Affordable housing
- Housing developments that provide supportive services
- Assistance in locating housing or in securing shared housing
- Access to housing which accommodates children
- Access to housing which is designed for security and convenience
- Access to housing near parks and open space to serve the needs of female householders with children.

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

Table A-17 shows that, according to the 2010 Census, 3,162 female householders live in Calexico.

**Table A-17**  
**City of Calexico**  
**Female Householders by Tenure – 2010**

Type of Household	Owner	Renter	Total	Percent
Family, No Husband	980	1,339	2,319	73.3%
Living with others	33	64	97	3.1%
Living Alone				
<65 Years	98	174	272	8.6%
65 Years+	121	353	474	15.0%
Subtotal Living Alone	219	527	746	23.6%
Total	1,232	1,930	3,162	100.0%
Percent	39.0%	61.0%		

Source: 2010 Census Summary File 1 (SF 1), Table QT-H3 Household Population and Household Type by Tenure: 2010  
Table construction by Castañeda & Associates

Female householders comprise a little less than one-third (31.3%) of all householders. An estimated 2,319 female householders live with a family and 746 live alone. About 15% of all female householders are 65 years of age or older and live alone. Potential housing needs include rental assistance and assistance with home maintenance and repairs for owner female householders living alone.

### **g. Families and Persons in Need of Emergency Shelter**

According to HUD, a person is considered homeless:

Only when he/she resides in one of the places described below at the time of the count.  
An unsheltered homeless person resides in:

- A place not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the street.

A sheltered homeless person resides in:

- An emergency shelter.
- Transitional housing for homeless persons who originally came from the streets or emergency shelters.

The Imperial County Point-in-time Homeless Count estimates a total of about 140 homeless persons. The same source indicates that Calexico has about 40 homeless persons. The total City count includes the chronically homeless. Existing resources to address the needs of homeless persons include Neighborhood House of Calexico, Inc., Campesinos Unidos, and the Calexico Housing Authority.

The Neighborhood House Shelter is an emergency 30-day stay temporary shelter for women and children. The Shelter is for women who:

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

- Have been evicted by landlord or are homeless
- Are low-income
- Are clean and sober for at least 6 months
- Are able to live in a group environment with other women and children
- Are willing to work with a case manager in meeting personal objectives

The Neighborhood House Transitional Housing (NHTH) is transitional housing for homeless women and children. The program offers housing, counseling, support group, case management, assistance, food, clothing, referrals and advocacy with community services.

In 2012, the Neighborhood House Shelter/Transitional Housing served 165 unduplicated persons. In 2012, 4,678 shelter nights were provided.

Campeños Unidos, Inc. provides emergency assistance up to three months. This organization considers emergency assistance needs a growing and significant problem.

The Calexico Housing Authority offers a Transitional Housing Program for homeless individuals working toward self-sufficiency. Housing is provided for one or two years for homeless people looking for work or going to school. The program pays for rent and utilities and offers referrals to shelters and motel vouchers until transitional housing is available (usually 2 weeks to 3 months).

### 6. PROJECTED HOUSING NEEDS

#### a. Population Trends and Projections

Over the past 33 years, the City's population grew by almost 26,000 persons. The largest population gains happened in the 10 years between 2000 and 2010. But a significant number was also added from 1990 to 2000. Table A-18 shows the population trends during the past three decades.

**Table A-18**  
**City of Calexico**  
**Population Growth Trends - 1980 to 2013**

Year	Population	Incremental Increase	Incremental % Increase	Cumulative Increase	Cumulative % Increase
1980	14,412				
1990	18,633	4,221	29.3%	4,221	29.3%
2000	27,109	8,476	45.5%	12,697	88.1%
2010	38,572	11,463	42.3%	24,160	167.6%
2013	40,493	1,921	5.0%	25,981	180.3%

Source: U.S. Census of Population and Housing for years 1980, 1990, 2000 and 2010  
State of California, Department of Finance, *E-5 Population and Housing Estimates for Cities, Counties, and the State 2012, with 2010 Benchmark* Sacramento, California, May 2013  
Table construction by Castañeda & Associates

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

The population growth projections indicate considerable gains. The SCAG 2012 RTP Forecast shows an increase of 14,310 persons and 4,518 households in the 12-year period from 2008 and 2020. The household forecast is similar to the City’s regional share allocation of 3, 224 housing units between January 2014 and October 2021, an almost eight year period.

**b. Employment Trends and Projections**

Employment generates income, which leads to effective housing demand and housing choice. Table A-19 shows that SCAG projects that Imperial County will add 40,400 jobs between 2008 and 2020. During this 12-year period, SCAG projects that Calexico will add 6,300 jobs or about one-sixth of the Imperial County total.

According to the 2010 American Community Survey, about 20% of Calexico’s labor force is unemployed. That means that between 2000 and 2010 the number of jobless persons increased by almost 2,000 (1,420 to 3,359).

**Table A-19  
Imperial County: Employment Growth by City – 2008 -2020**

City	2008 Employment	2020 Employment	Employment Growth	Percent Distribution
Brawley	7,500	12,300	4,800	11.9%
Calexico	9,000	15,300	6,300	15.6%
Calipatria	2,300	4,000	1,700	4.2%
El Centro	18,600	31,400	12,800	31.6%
Holtville	1,600	2,600	1,000	2.5%
Imperial	2,800	4,800	2,000	5.0%
Unincorporated	18,900	30,300	11,400	28.2%
Westmorland	600	1,000	400	1.0%
<b>Total</b>	<b>61,300</b>	<b>101,700</b>	<b>40,400</b>	<b>100.0%</b>

Southern California Association of Governments, *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy Growth Forecast* (adopted by the SCAG Regional Council on April 4, 2012)

Table construction by Castañeda & Associates

**c. Share of Regional Housing Needs**

SCAG has allocated to each city and county a share of the regional housing need. The regional share includes new housing need to -

- Accommodate household growth
- Replace units lost from the inventory due to demolitions, fires and other causes
- Provide a healthy vacancy rate

The Imperial County share of the six-county regional housing need is 16,551 housing units. Table A-20 shows the regional share need for each city and the County for five income groups. The City’s share of the regional housing need for the period from January 1, 2014 to October 1, 2021 is 3,224 housing units which is 19.4% of the total need allocated to Imperial County.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-20  
Imperial County: RHNA Housing Need by Income Category –  
January 1, 2014 – October 1, 2021**

City	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total	Percent Distribution
Brawley	380	380	470	466	1,338	3,034	18.3%
Calexico	408	409	489	490	1,428	3,224	19.5%
Calipatria	18	19	22	22	63	144	0.9%
El Centro	243	244	300	297	840	1,924	11.6%
Holtville	27	27	31	32	92	209	1.3%
Imperial	174	175	205	202	553	1,309	7.9%
Unincorporated	816	817	1,001	1,001	2,839	6,474	39.1%
Westmorland	28	29	35	36	105	233	1.4%
<b>Total</b>	<b>2,094</b>	<b>2,100</b>	<b>2,553</b>	<b>2,546</b>	<b>7,258</b>	<b>16,551</b>	<b>100.0%</b>

Source: Southern California Association of Governments, *5<sup>th</sup> Cycle Final Regional Housing Needs Assessment Allocation Plan*, adopted by the Regional Council on October 4, 2012

## **C. SITES INVENTORY AND ANALYSIS**

### **1. INTRODUCTION AND SUMMARY**

The City's share of the regional housing need of 3,224 housing units by income group is as follows:

- Above Moderate Income                      1,428 housing units
- Moderate Income                              490 housing units
- Lower income                                    1,306 housing units

Government Code Section 65583(a)(3) states that a housing element must include:

An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment and an analysis of the relationship of zoning and public facilities and services to these sites.

Section 65583.2(a) states that the inventory of land suitable for residential development –

...shall be used to identify sites that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels...."

### **2. SITES TO ACCOMMODATE THE ABOVE MODERATE INCOME HOUSING NEED**

Table A-21 identifies five vacant sites/projects with a combined capacity of 1,672 housing units that accommodate the above moderate income housing need of 1,428 housing units. Residential densities range from about 2 to 6 dwelling units per acre.

Exhibit A-1 shows the locations of the above moderate income housing sites.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-21  
City of Calexico  
Inventory of Vacant Sites that Accommodate  
the Above Moderate Income Housing Need**

APN	Project Name	General Plan Designation	Zone District	Acres	App'd. Units	Density	Constraints
059-170-005	Las Palmas	LDR	R1	324.00	600	1.85	None
059-010-007, 059-010-057, 059-010-058, 059-010-059	Estrella Subdivision	LDR	R1	96.51	391	4.05	None
059-170-001, 059-170-002	Palazzo Subdivision <sup>1</sup>	Specific Plan	Specific Plan	30.91	182	5.89	None
059-180-045	Venezia	LDR	R1	40.01	249	6.22	None
059-491-003, 059-500-002	Pacific Century Homes	LDR	R1	40.00	250	6.25	None
<b>Total</b>				<b>531.43</b>	<b>1,672</b>	<b>3.14</b>	

<sup>1</sup>Located in Sphere of Influence

Source: Calexico Amended Final Housing Element, December 2009, Table 2.2-17, page 73  
 City of Calexico, Community Development Department/Planning Division, Project List Monthly Status Report  
 City of Calexico, Planning Commission Meeting Agenda, December 12, 2011 (Palazzo Specific Plan)  
 Imperial County Local Agency Formation Commission, Minutes of September 24, 2009 Meeting (Estrella Subdivision annexation approved)  
 Imperial County Assessor's Office (Assessor Parcel Maps and updated Assessor Parcel Numbers)  
 Table construction by Castañeda & Associates

### **3. SITES TO ACCOMMODATE THE MODERATE INCOME HOUSING NEED**

Table A-22 identifies four vacant sites/projects with a combined capacity of 1,802 housing units that accommodate the moderate income housing need of 490 housing units. Residential densities range from about 12 to 14 dwelling units per acre.

Exhibit A-2 shows the locations of the moderate income housing sites.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-22  
City of Calexico  
Inventory of Vacant Sites that Accommodate  
the Moderate Income Housing Need**

APN	Project Name	General Plan Designation	Zone District	Acres	App'd. Units	Density	Constraints
059-010-058	Estrella Subdivision	MDR	RC	20.03	244	12.18	None
058-180-050, 058-180-064	Remington Condominiums	MDR	RC	20.00	272	13.60	None
058-180-008, 058-180-009, 058-180-010, 058-180-011	River View Condominiums	MDR	RC	25.00	352	14.08	None
059-170-001, 059-170-002	Palazzo Subdivision <sup>1</sup>	Specific Plan	Specific Plan	65.48	934	14.26	None
<b>Total</b>				<b>130.51</b>	<b>1,802</b>	<b>13.80</b>	

<sup>1</sup>Located in Sphere of Influence

Source: Calexico Amended Final Housing Element, December 2009, Table 2.2-17, page 73

City of Calexico, Community Development Department/Planning Division, Project List Monthly Status Report, (Palazzo Subdivision and Rancho Diamante)

City of Calexico, Planning Commission Meeting Agenda, December 12, 2011 (Palazzo Specific Plan)

Imperial County Local Agency Formation Commission, Minutes of September 24, 2009 Meeting (Estrella Subdivision annexation approved)

Imperial County Assessor's Office (Assessor Parcel Maps and updated Assessor Parcel Numbers)

Source for General Plan Designation is City of Calexico General Plan Map dated 2007

Source for Zoning is City of Calexico Zoning Map dated January 16, 2008

Table construction by Castañeda & Associates

#### **4. SITES TO ACCOMMODATE THE LOWER INCOME HOUSING NEED**

One approved site and five vacant sites accommodate the lower income housing need of 1,306 housing units allocated to the City for the 5<sup>th</sup> Cycle RHNA:

- One vacant site – Villa Primavera - is approved for 48 affordable rental housing units. The developer of Villa Primavera is Chelsea Investco and the project was awarded State HOME funds.
- In addition, five vacant sites (eight assessor parcels) are zoned RA (Residential Apartment Zone) which provides for a residential density between 20 and 30 dwelling units per acre.

The housing capacity of the five RA zoned sites is 1,647 housing units (68.69 acres @ 24 dwellings per acre = 1,647 housing units). The housing capacity is based at about the mid-range of 20 to 30 dwelling units per acre.

Table A-23 lists information for each of the five sites.

The total housing capacity is 1,695 housing units which exceeds Calexico's share of the regional housing need for lower income housing sites.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-23  
City of Calexico  
Sites Inventory to Accommodate Lower Income Housing Need  
RA – Residential Apartment Zoned Sites (20-30 dus/ac)**

Site	Acres	Land Use Designation	Zoning Designation	Housing Capacity
059-455-001 <sup>1</sup> 059-455-002 <sup>1</sup>	4.22	HDR	RA	101
058-832-016	6.53	HDR	RA	156
058-853-001 058-853-002	9.85	HDR	RA	236
Part of Calexico Mega Park	15.00	HDR	RA	360
059-010-019 <sup>2</sup> 059-010-020	33.09	HDR	RA	794
<b>Total</b>	<b>68.69</b>			<b>1,647</b>

Note: The HDR land use designation refers to High Density Residential.

Parcel size is based on assessor parcel data and plan for Mega Park.

<sup>1</sup>059-455-001 = 2.07 acres; 059-455-002 = 2.15 acres

<sup>2</sup>059-010-019 = 19.78 acres; 059-010-020 = 13.31 acres

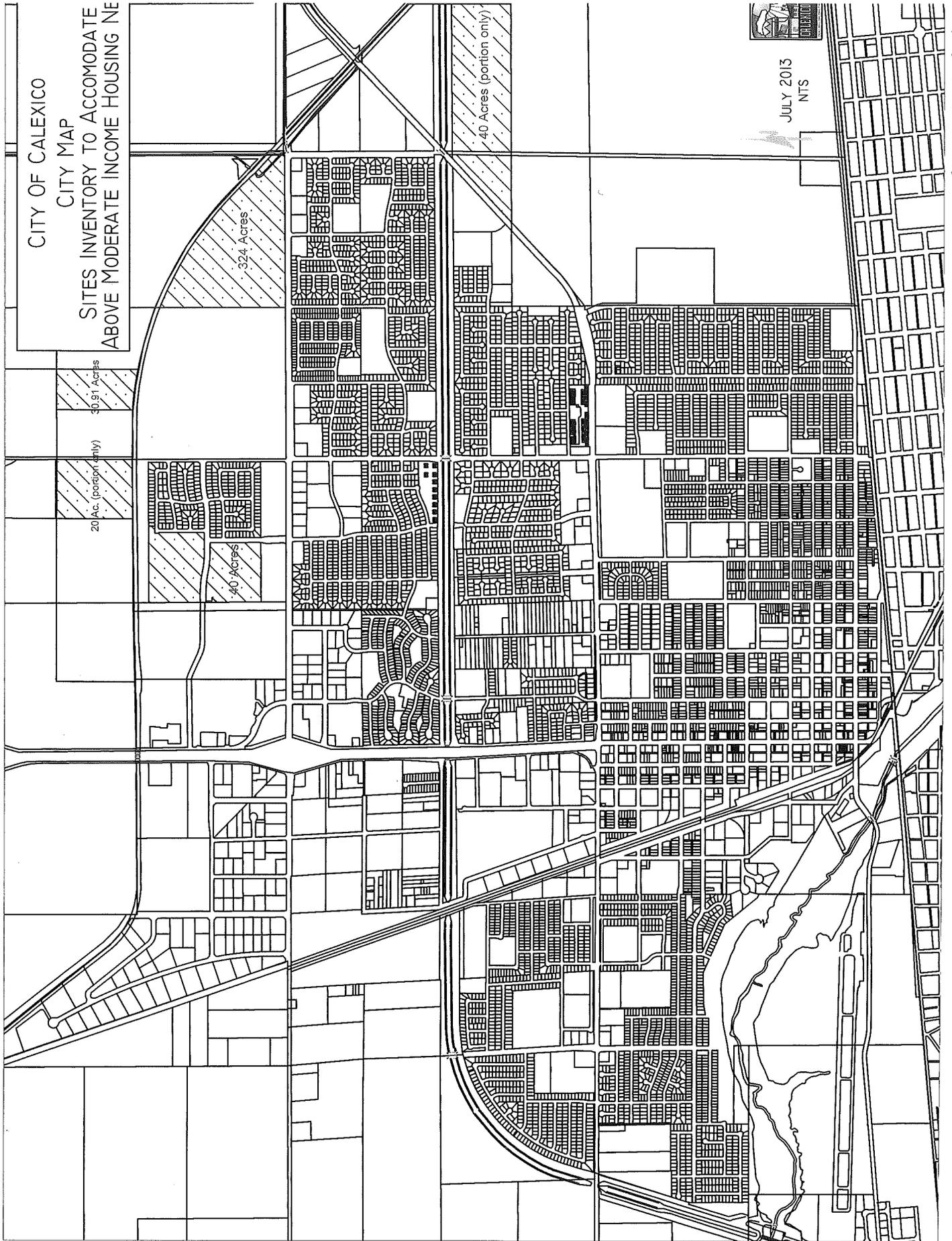
Table construction by Castañeda & Associates

Exhibit A-3 shows the locations of the lower income housing sites.

CITY OF CALEXICO

CITY MAP

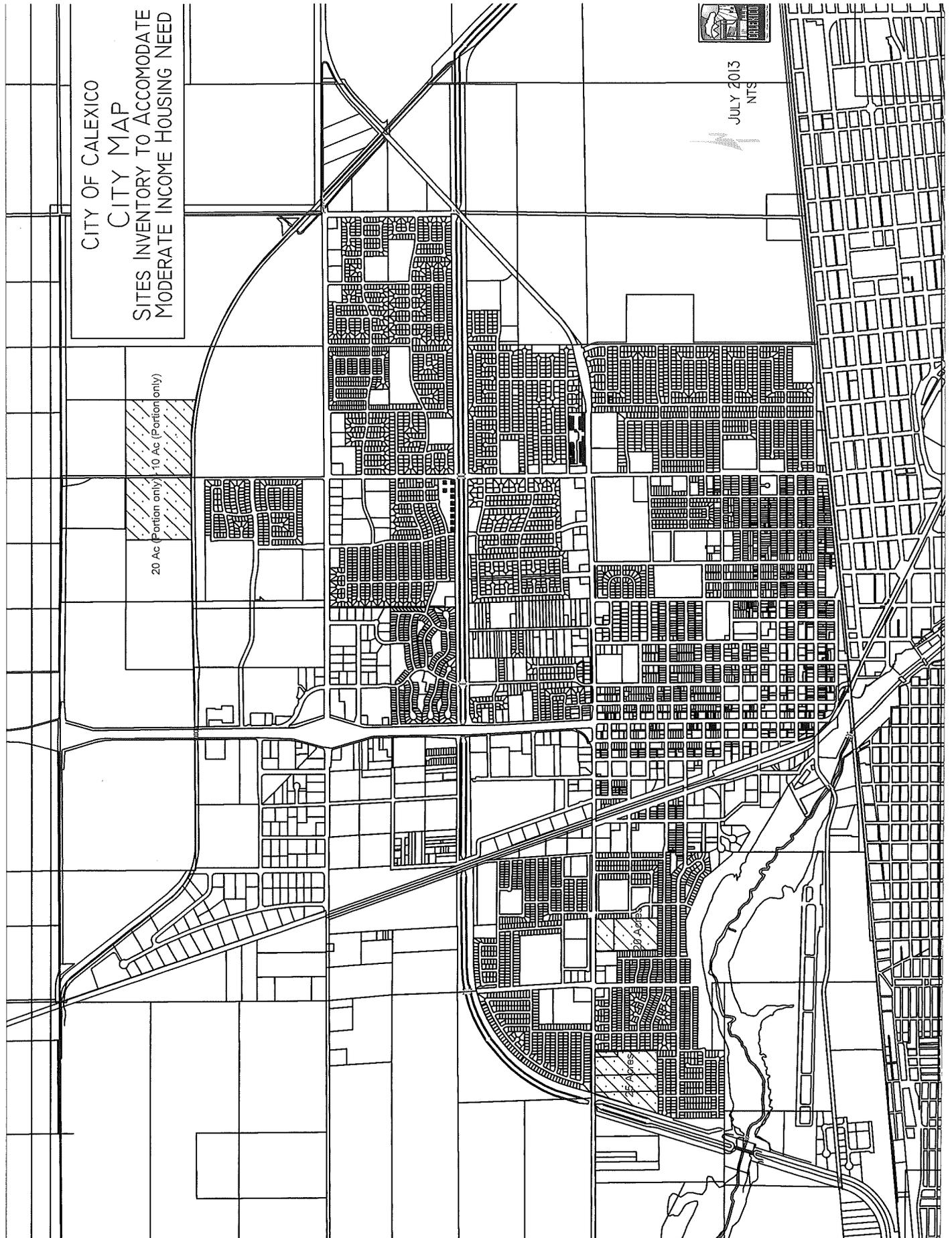
SITES INVENTORY TO ACCOMMODATE  
ABOVE MODERATE INCOME HOUSING NE



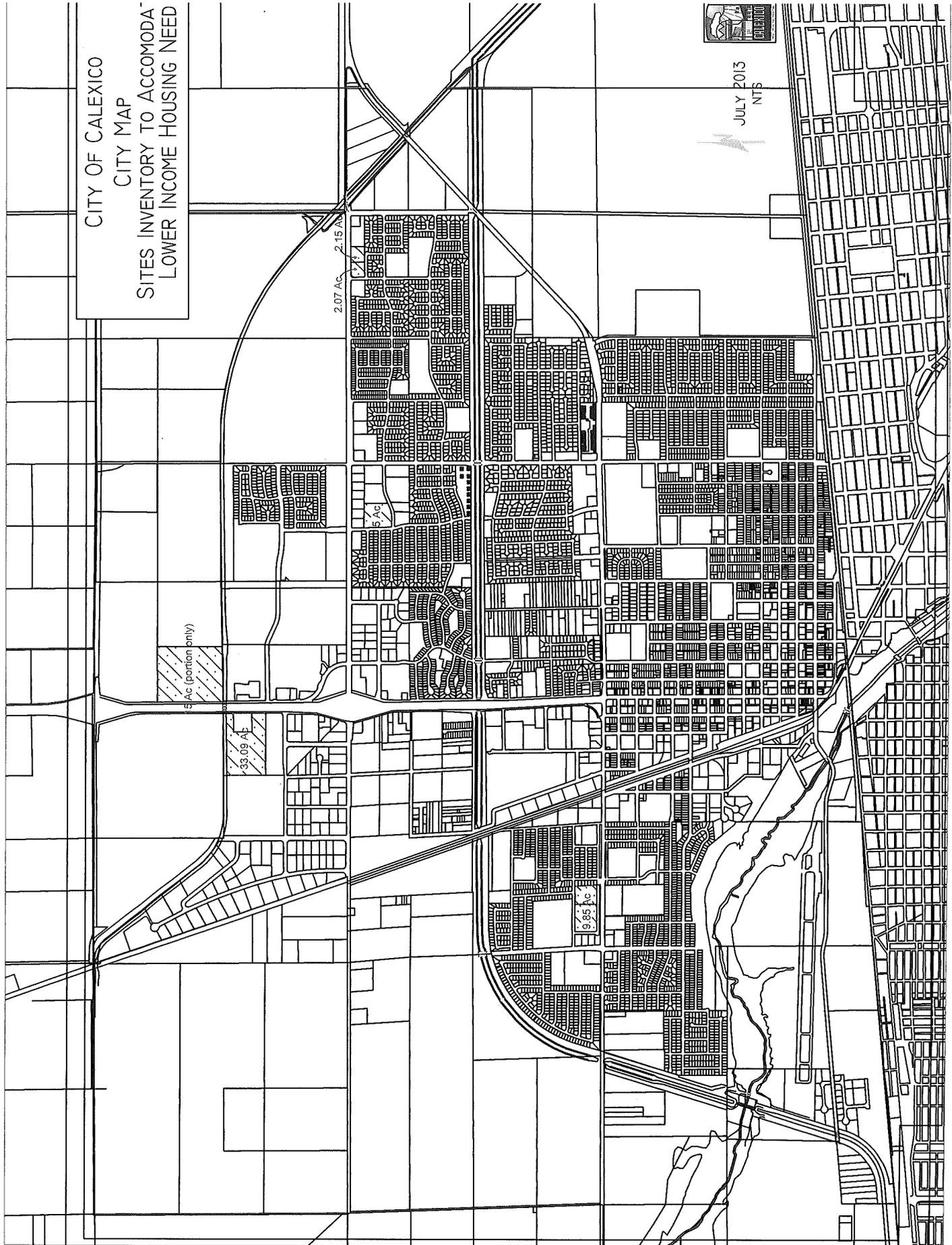
CITY OF CALEXICO

CITY MAP

SITES INVENTORY TO ACCOMMODATE  
MODERATE INCOME HOUSING NEED



CITY OF CALEXICO  
CITY MAP  
SITES INVENTORY TO ACCOMMODATE  
LOWER INCOME HOUSING NEED



## **5. Public Services and Facilities**

The City of Calexico can supply water and sewer services to all areas within the City limits and to the areas planned for growth in the Sphere of Influence (SOI). Water and sewer services are available to the recently approved projects within the City's limits. Eight of 13 sites identified in the Sites Inventory and Analysis have been approved and were subject to environmental review under the provisions of CEQA. The services are available through the extension and upgrading of certain water and sewer lines and lift stations, which are requirements under each project's tentative map conditions of approval. Project developers are responsible for funding the required improvements.

The City provides its own sewerage service treating effluent at the Calexico Water Pollution Control Plant located north of Calexico International Airport. The system contains many small lift stations due to the flat topography, bringing service to the residents. Effluent is processed and deposited into the New River. The present plant has a design flow capacity of 4.30 million gallons per day (MGD).

According to the City's Service Area Plan recommendations, development within the current Sphere of Influence will necessitate certain improvements and upgrades to the City's wastewater facilities in order to accommodate the projected growth. The projected growth described in the Service Area Plan exceeds the City's RHNA allocation and extends beyond the 2021 planning horizon.

Existing capacity coupled with the short- and long-term improvements described in the Service Area Plan will provide sufficient sewer capacity to accommodate the RHNA allocation. These planned improvements include the installation of new regional pump stations, gravity pipelines and force mains and the upgrade of the facility from an average daily flow of 4.3 to 8.5 MGD. The conditions of approval for projects located within the SOI include compliance with the recommendations.

The City of Calexico Service Area Plan also includes recommendations for the upgrade and improvement to the City's Water Treatment Plant facility and water storage and conveyance systems in order to accommodate growth within the current Sphere of Influence. The conditions of approval for approved projects include compliance with the recommended improvements and upgrades to the facility prior to the issuance of any certificates of occupancy. Existing capacity coupled with the short- and long-term improvements described in the Service Area Plan will provide sufficient water capacity to accommodate the RHNA allocation.

## **6. Environmental Conditions**

The vacant sites identified in the land survey are sites well suited to residential development. Environmental constraints, such as wetlands or contamination, do not occur that would inhibit developers from building on the parcels identified in the Sites Inventory and Analysis or areas located within the Sphere of Influence. No major grading would be required of the parcels identified in the sites inventory.

According to the General Plan EIR, the City lies within a seismically active region. The County of Imperial General Plan estimates that minor earthquakes will affect certain portions of Imperial County every few months. In addition, Imperial County will most likely experience a moderately damaging event every five years; and at least once every fifty years, a major earthquake will

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

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most likely occur. Within the last 35 years, Calexico has been damaged due to the movements of major faults in the San Jacinto Fault Zone (i.e., the Imperial and Superstition Hills Faults).

Liquefaction, settlement, ground lurching, ground displacement along the fault line, and landslides are often the secondary effects of earthquakes. The soils in the Salton Trough, which includes the City of Calexico, have properties that could facilitate these effects, including unconsolidated soils, high groundwater, and saturated soils. Although the City is subject to the hazards associated with a seismically active region, adherence to the most recent construction and maintenance practices, such as the California Building Code (CBC), by development projects will lessen impacts from known geologic hazards. The City requires engineering reports to establish appropriate design standards and mitigation measures taken to alleviate these hazards.

### D. HOUSING MARKET CONSTRAINTS

#### 1. INTRODUCTION AND SUMMARY

Government Code Section 65583(a)(6) requires –

An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction.

According to HCD:

Although nongovernmental constraints are primarily market-driven and generally outside direct government control, localities can significantly influence and offset the negative impact of nongovernmental constraints through responsive programs and policies. Analyzing specific housing cost components including the cost of land, construction costs, and the availability of financing assists the locality in developing and implementing housing and land-use programs that respond to existing local or regional conditions. While the cost of new housing is influenced by factors beyond a locality's control, local governments can create essential preconditions (favorable zoning and development standards, fast track permit processing, etc.) that encourage and facilitate development of a variety of housing types and affordable levels.

The requisite analysis includes:

- Land Costs – Estimate the average cost or the range of costs per acre for single-family and multifamily zoned developable parcels.
- Construction Costs – Estimate typical total construction costs which include materials and labor.
- Availability of Financing - Consider whether housing financing, including private financing and government assistance programs, is generally available in the community. This analysis could indicate whether mortgage deficient areas or underserved groups exist in the community.

In addition to the above, the market constraints analysis includes the cost of housing in terms of the sales prices of single-family detached and attached housing and monthly rents.

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

In summary:

- Land, construction and financing costs each contribute to establishing the minimum costs to produce housing.
- There have been no recent land sale transactions. There are currently only three residential sites on the market, two approved condominium sites and one un-entitled apartment site. The price per unit ranged from \$10,150 to \$13,352.
- Average construction costs range between \$122 and \$133 per square foot
- Home Mortgage Disclosure Act data indicates that –
  - ✓ 86% of conventional loan applications were approved
  - ✓ 86.8% of FHA loan applications were approved
  - ✓ Only two home improvement loan applications were approve

### 2. LAND COSTS

Land costs are a major component of new housing production costs. The development industry typically categorizes land into three types: raw land, entitled land, and finished lots.

The values attributed to parcels of land increase through these three stages. Raw land is a vacant piece of land without any entitlements or improvements. Entitled land can range from having the appropriate zoning to having a recorded subdivision for the land. Again the values can increase the further a piece of land is in the entitlement process. Finally, land can be categorized as “finished lots”. This is the final stage prior to the actual construction of a home. All grading has been completed and all infrastructure (streets, curbs, gutters, storm drains, sewers and utilities) have been installed. In most cases, this also means that all fees (except those associated with building permits) have also been paid. At this stage, the land is at its highest value.

There have been no recent land sales. Table A-24 shows current residential land asking prices. There is currently no single family land on the market. The estimated per housing unit land range between \$10,000 and \$13,400.

**Table A-24  
City of Calexico  
Land Prices**

Location	Entitlement Status	Zoning	Size (Ac.)	Number of Units	Price	Price/Unit
Meadow Drive <sup>1</sup>	Raw	RA-Residential Apartment	6.67	133	\$1,350,000	\$10,150
109 W. Hwy 98 <sup>2</sup>	Approved	Mixed Use Project	32.66	352	\$4,700,000	\$13,352
249 W. Hwy 98 <sup>3</sup>	Approved	Condominiums	19.27	272	\$3,500,000	\$12,868

<sup>1</sup>Zoning allows 20-30 units per acre. Number of units based on 20 units per acre.

<sup>2</sup>This is the Riverview Condominium Project. Price per unit based only on the number of dwelling units and does not consider the commercial component of the project.

<sup>3</sup>This is the Remington Development Project.

Source: LoopNet commercial real estate.

### **3. CONSTRUCTION COSTS**

Average construction costs are difficult to estimate because they can vary due to the following physical characteristics:

- Design type
- Construction type
- Quality
- Shape
- Location (mountains vs flatlands)

Source: California State Board of Equalization, Assessors' Handbook Section 531, *Residential Building Costs*, January 2010, page 4

The International Code Council (ICC) provides Building Valuation Data (BVD) for its members. The BVD table provides the "average" construction costs per square foot, which can be used to determine permit fees for a jurisdiction. The ICC states:

...it should be noted that, when using this data, these are "average" costs based on typical construction methods for each occupancy group and type of construction. The average costs include foundation work, structural and nonstructural building components, electrical, plumbing, mechanical and interior finish material.

Table A-25 shows the BVD average per square foot construction costs for three types of buildings.

**Table A-25  
Construction Costs per Square Foot for Residential Construction**

<b>Group (2012 International Building Code)</b>	<b>Type IV Classification</b>
R-2 Residential, multiple family	\$124.24
R-3 Residential, one- and two-family	\$122.07
R-4 Residential, care/assisted living facilities	\$149.84
Private garage	\$56.48

Source: International Code Council, Building Valuation Data (BVD), August 2012

The estimated average construction cost of the 48 unit Villa Primavera multi-family project is \$133.34 per square foot. The average per unit cost was \$114,700.

Based on the BVD, the following are estimated construction costs for a -

- 1,000 SF housing unit in an apartment building      \$124,240
- 1,500 SF single-home on a level lot                      \$183,105
- 400 SF garage for single family home                      \$22,592

However, it is important to note that while this BVD table does determine an estimated cost of a building (i.e., Gross Area x Square Foot Construction Cost), this data is only intended to assist jurisdictions in determining their permit fees. This data table is not intended to be used as an

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

estimating guide because the data only reflects average costs and is not representative of specific construction.

The average construction costs may be low because they may not include architecture, building permit/plan check fees and development impact fees. They also are considerably less than the lowest tax credit unit costs in the state which is about \$237,000. (Source: California Tax Credit Allocation Committee, *Cost Containment Forums Report*, August 23, 2011.) Additionally, affordable housing projects need to pay prevailing wages. This requirement typically drives up construction costs by 15% to 20%.

New affordable homes and apartments cannot be constructed without some public funding sources that subsidize the entire development and reduce the loan amount to that which can be supported by the affordable rents and mortgage payments. For instance, the City's two newest affordable housing developments each received State HOME funding. The loss of City redevelopment funds will impede efforts to produce additional affordable housing units.

### 4. AVAILABILITY OF FINANCING

#### a. Financing Availability Based On Interest Rates

For a sustained period of time, market mortgage interest rates have been either very reasonable or at historic lows. Table A-26 shows interest rates for two points in time. According to a weekly survey of 20 southland lenders, as of September 11, 2013, the average mortgage interest rates on 30-year fixed rate loans up to \$417,000 have increased by close to 1%. All other loan types have also increased during the past six months. Interest rates remain low compared to historical standards.

**Table A-26**  
**Average Mortgage Interest Rates**  
**Weekly Survey of 20 Southland Lenders - As of September 11, 2013**

Type of Loan	Last Week	Six Months Prior
<i>Rates for loans up to \$417,000</i>		
30-year fixed	4.68%/.41 pt.	3.80%/.27 pt.
15-year fixed	3.76%/.29 pt.	2.97%/.31 pt.
<i>Rates for loans of \$417,00 and up</i>		
30-year fixed	4.85%/.22 pt.	4.03%/.41 pt.
15-year fixed	4.15%/.15 pt.	3.31%/.33 pt.

Note: A pt. (point) is a term used by the lending industry to refer to the loan origination fee. One point is equal to 1% of the loan amount.

Source: Compiled by HSH Associates, Financial Publishers

It should be noted that not all would be homebuyers would qualify for the lowest interest rates available. The most favorable interest rates are available to loan applicants who have good FICO credit scores. FICO refers to Fair Issac Corporation, a firm that developed the mathematical formulas used to produce FICO scores. A FICO score is a snapshot of an applicant's credit risk; the higher the score, the lower the risk to lenders. The FICO score is computed based on: payment history, amounts owed, length of credit history, new credit, and types of credit in use.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**b. Financing Availability Based on HMDA Data**

1. Introduction

HCD has advised cities that an understanding of the geographic areas and or groups without sufficient access to credit will help localities to design programs to address known deficiencies. The information that helps most to understand the geographic areas served by credit is the Home Mortgage Disclosure Act or HMDA data.

HMDA requires lenders to disclose the number, amount, and census tract location of mortgage and home improvement loan applications. The HMDA data encompasses lender activity for conventional, FHA, home improvement loans and refinancing loans. The data identifies five types of action taken on a loan application: loan originated, application approved by the lender and not accepted by the applicant, application withdrawn, file closed for incompleteness and application denied.

It is important to remember that the *census tract location* in the following tables refers to the *property location* on which a loan application was made. However, borrowers who live outside the City frequently make the loan applications, and the reasons for denial may be due entirely to the credit worthiness of the borrower, and not the characteristics of a census tract.

2. 2011 Loan Applications

In calendar year 2011 301 loan applications were made – 14% for conventional loans and 86% for FHA insured loans.

Table A-27 shows that practically all of the conventional loan applications were made in two census tracts. Only 14% of the 43 conventional loan applications were denied. Compared to other communities, the denial rate for conventional loans was quite low.

**Table A-27  
City of Calexico  
Conventional Loan Denial Rates by Census Tracts – 2011**

Census Tract	Loans Originated	Approved, Not Accepted	Applications Denied	Total Applications	Denial Rate
119	16	1	4	21	19.0%
120	15	1	1	17	5.9%
121	0	1	0	1	0.0%
122	3	0	1	4	25.0%
Total	34	3	6	43	14.0%

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA), Loan Application Register System (LARS) 2011.

Table A-28 shows that owner occupied FHA, VA and FSA home purchase loan applications in Calexico totaled 258 in 2011. While the denial rates ranged from 4% to 50% (only four applications), the overall denial rate for these loan applications was slightly lower than conventional applications at 13.2%. However, 41% of the FHA/VA loans were in just one tract 119.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-28  
City of Calexico  
FHA/VA/FSA Loan Denial Rates by Census Tracts – 2011**

Census Tract	Loans Originated	Approved, Not Accepted	Applications Denied	Total Applications	Denial Rate
119	88	6	11	105	10.5%
120	75	5	19	99	19.2%
121	1	1	2	4	50.0%
122	48	0	2	50	4.0%
Total	212	12	34	258	13.2%

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA), Loan Application Register System (LARS) 2011.

Overall, credit is available for homes to be purchased in the City. The FHA loan applicants wishing to purchase in census tract 120 had a higher denial rate of 19.2%. The reason for this high denial rate is unknown; however, the City staff plans to analyze prior year HMDA data to determine if this is long-term trend or an isolated occurrence.

**3. Home Improvement Loan Applications – 2011**

Typically, loan applications for home improvement loans have higher denial rates than home purchase loans. In 2011 only two home improvement loans were originated while 13 (81%) were denied. One application was approved but not accepted.

Table A-29 shows that during the four year period from 2008 through 2011 a total of only 20 home improvement loans were originated, an average of five per year. Sixty percent of the 20 loans were originated in 2008.

**Table A-29  
City of Calexico  
Home Improvement Loans Originated by Census Tracts – 2008-2011**

Census Tract	2008	2009	2010	2011	Total	Average
119	3	4	0	1	8	2.0
120	5	0	2	1	8	2.0
121	2	0	0	0	2	0.5
122	2	0	0	0	2	0.5
Total	12	4	2	2	20	5.0

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA), Loan Application Register System (LARS) 2011.

While home improvement loans were made in all the census tracts, most were made in census tracts 119 and 120. Therefore, current home owners may need to seek other financing sources for home improvements such as CDBG funds.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

4. Reasons for Loan Denial – 2011

Table A-30 shows that 53 loan applications for conventional, FHA/VA/FSA and home improvement loans were denied in 2011. More than one-half of all loans were denied for either debt-to-income ratios or credit history. The three major reasons for loan denials were:

- Credit history                    about 32%
- Debt-to-income ratio    about 21%
- Other reasons                    about 32%

According to HMDA:

- Credit history refers to insufficient number of credit references provided; unacceptable type of credit references provided; no credit file; limited credit experience; poor credit performance with lender; delinquent past or present credit obligations with others; garnishment, attachment, foreclosure, repossession, collection action, or judgment; and bankruptcy.
- Debt-to-income ratio refers to “income insufficient for amount of credit requested and excessive obligations in relation to income.”

Source: Federal Financial Institutions Examination Council, *A Guide to HMDA Reporting – Getting Right*, January 1, 2008, Appendix A, Reasons for Denial

**Table A-30  
City of Calexico  
Reasons for Loan Denial by Type of Loan – 2011**

Reasons for Loan Denials	Conventional	FHA/VA	Home Improvement	Total	Percent
Debt-to-Income Ratio	2	9	0	11	20.8%
Employment History	1	0	0	1	1.9%
Credit History	1	6	10	17	32.1%
Collateral	0	1	0	1	1.9%
Insufficient Cash <sup>2</sup>	0	2	0	2	3.8%
Unverifiable Information	0	1	0	1	1.9%
Credit Application Incomplete	0	2	1	3	5.7%
Mortgage Insurance Denied	0	0	0	0	0.0%
Other <sup>3</sup>	2	13	2	17	32.1%
<b>Total</b>	<b>6</b>	<b>34</b>	<b>13</b>	<b>53</b>	<b>100.0%</b>

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA), Loan Application Register System (LARS) 2011.

The City's Housing Rehabilitation Loan Program can assist some of the denied applicants through low interest loans. The program must be used to correct building, fire, health, and safety deficiencies. General "eligible" improvements desired by the homeowner may also be included. The program is strictly designed for low income residents (<80% AMI).

## 5. HOUSING COSTS

### a. Sales Prices

Although the Housing Element Law and guidelines do not explicitly mention the price of existing housing, this potential constraint falls within the meaning of “nongovernmental” or market-driven barriers to affordability. The analysis also helps to determine whether local, State or Federal programs can be practically applied to address the needs of first-time homebuyers

The sales prices for existing single family homes and condominiums were analyzed for calendar years 2011 and 2012.

For calendar year 2011, there were a total of 272 sales of existing single family homes to owner occupants. Forty-nine sales were made to non-owner occupants or investors. It is important to note that 141 of the 272 (52%) owner-occupied sales were bank-owned or Real Estate Owned (REO) sales. More than two thirds (69%) of the non-owner occupied sales were bank-owned sales.

In calendar year 2012 there were a total of 212 sales to owner occupants. Fifty-two sales were to non-owner occupants or investors. The percentage of bank-owned sales decreased for both owner-occupants and non-owner occupants to 35% and 44% respectively.

Overall, more than half (54.3%) of the 484 owner occupied sales were at \$140,000 or more, and more than half (59.4%) of the non-owner occupied sales were less than \$140,000. Tables A-31 and A-32 provide details on the sales price distribution.

**Table A-31  
City of Calexico  
Sales Prices of Owner Occupied Single Family Homes-2011 and 2012**

Price	2011		2012		Total	
	Number	Percent	Number	Percent	Number	Percent
<\$70,000	8	2.9%	3	1.4%	11	2.3%
\$70,000-79,999	7	2.6%	4	1.9%	11	2.3%
\$80,000-89,999	6	2.2%	14	6.6%	20	4.1%
\$90,000-99,999	12	4.4%	6	2.8%	18	3.7%
\$100,000-109,999	18	6.6%	8	3.8%	26	5.4%
\$110,000-119,000	19	7.0%	9	4.2%	28	5.8%
\$120,000-129,999	25	9.2%	17	8.0%	42	8.7%
\$130,000-139,999	37	13.6%	28	13.2%	65	13.4%
\$140,000-149,999	32	11.8%	30	14.2%	62	12.8%
\$150,000-159,999	24	8.8%	28	13.2%	52	10.7%
\$160,000-169,999	17	6.3%	16	7.5%	33	6.8%
\$170,000-179,999	13	4.8%	10	4.7%	23	4.8%
\$180,000-189,999	11	4.0%	8	3.8%	19	3.9%
\$190,000-199,999	19	7.0%	8	3.8%	27	5.6%
\$200,000+	24	8.8%	23	10.8%	47	9.7%
<b>Total</b>	<b>272</b>	<b>100.0%</b>	<b>212</b>	<b>100.0%</b>	<b>484</b>	<b>100.0%</b>

Note: There were 141 REO sales in 2011 and 75 in 2012. One Property in 2011 did not record a sales price. Source: Realist property tax records from the Pacific West Association of Realtors

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-32  
City of Calexico  
Sales Prices of Non-Owner Occupied Single Family Homes-2011 and 2012**

Price	2011		2012		Total	
	Number	Percent	Number	Percent	Number	Percent
<\$70,000	4	8.2%	9	17.3%	13	12.9%
\$70,000-79,999	5	10.2%	0	0.0%	5	5.0%
\$80,000-89,999	2	4.1%	4	7.7%	6	5.9%
\$90,000-99,999	2	4.1%	1	1.9%	3	3.0%
\$100,000-109,999	0	0.0%	7	13.5%	7	6.9%
\$110,000-119,000	6	12.2%	5	9.6%	11	10.9%
\$120,000-129,999	8	16.3%	7	13.5%	15	14.9%
\$130,000-139,999	7	14.3%	7	13.5%	14	13.9%
\$140,000-149,999	8	16.3%	4	7.7%	12	11.9%
\$150,000-159,999	1	2.0%	3	5.8%	4	4.0%
\$160,000-169,999	1	2.0%	1	1.9%	2	2.0%
\$170,000-179,999	2	4.1%	2	3.8%	4	4.0%
\$180,000-189,999	0	0.0%	0	0.0%	0	0.0%
\$190,000-199,999	2	4.1%	0	0.0%	2	2.0%
\$200,000+	1	2.0%	2	3.8%	3	3.0%
<b>Total</b>	<b>49</b>	<b>100.0%</b>	<b>52</b>	<b>100.0%</b>	<b>101</b>	<b>100.0%</b>

Note: 34 REO Sales in 2011 and 23 in 2012.

Source: Realist property tax records from the Pacific West Association of Realtors

Owner occupied single family homes were generally affordable. About one of every eight homes sold for prices of less than \$100,000. Another 46% had sales prices in the range of \$100,000 to \$149,999.

Regarding condominium sales to owner occupants, there were only nine sales in 2011 and 2012 ranging in price from \$59,000 to \$110,000. Three of these sales were REOs. Non-owner occupants acquired 21 condominiums in 2011 and 2012 with prices ranging from \$45,000 to \$145,000. Fourteen of the non-owner occupied sales were REOs.

**b. Monthly Rents**

The 2009-2011 American Community Survey (ACS) estimated a total of 4,063 renters of which 101 reported "no cash rent" and 3,962 reported a monthly rent. The ACS determined that the median monthly cash rent was \$585. Almost 1,400 renter households reported monthly rents in the range of \$300 to \$599. Many of these households probably live in one of the City's affordable housing developments. Some 332 renter households have monthly rents of more than \$1,000.

If the City did not have affordable rental developments and Section 8 rental assistance, the cost burden problem would be much more severe than it now is.

## E. GOVERNMENTAL CONSTRAINTS ANALYSIS

### 1. INTRODUCTION

The Housing Element must include -

"An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels...."

The purpose of the analysis is to determine if a standard or practice "...constitute(s) a barrier to the maintenance, improvement or development of housing."

The required analysis includes seven governmental factors:

- Land use controls
- Building codes and their enforcement
- Site improvements
- Fees and exactions required of developers
- Local processing and permit procedures
- Constraints on housing for persons with disabilities
- Constraints on meeting regional share housing needs

The purpose of the analysis is to determine if a standard or practice "...constitute(s) a barrier to the maintenance, improvement or development of housing."

### 2. GOVERNMENTAL CONSTRAINTS IDENTIFIED BY THE *2008-2014 HOUSING ELEMENT*

Following a review of the Zoning Ordinance, the *2008-2014 Housing Element* identified amendments that should be enacted to remove or ameliorate governmental constraints. Consequently, the adopted element included action programs to amend the Zoning Ordinance to provide for:

- Emergency Shelters
- Transitional Housing and Supportive Housing
- Single Room Occupancy Housing
- Employee Housing

Furthermore, in order to address fair housing laws, it was found necessary to enact a reasonable accommodation procedure and to revise the family definition. Finally, the City has not updated the Zoning Ordinance to include procedures for processing density bonus applications pursuant to Government Code Sections 65915-65918.

In addition, the analysis of zoning provisions for licensed group homes indicates that City must amend the Zoning Ordinance to define such a use and permit by right licensed group homes in the residential zones that permit single family homes.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

Table A-33 describes the requirements of the Housing Element Law (Government Code Article 10.6) and the programs which were included in the *2008-2014 Housing Element* in order to remove governmental constraints. However, the Zoning Ordinance amendments – due to severe staff cutbacks – were not enacted. Consequently, the programs are carried forward into the 2013-2021 planning period.

**Table A-33  
City of Calexico  
Governmental Constraints Identified by the 2008-2014 Housing Element  
and Recommended Actions to Remove or Ameliorate the Identified Constraints**

<b>Employee Housing</b>	
<b><u>Health and Safety Code</u></b>	<b><u>2008-2014 Housing Element Program</u></b>
<p>Health and Safety Code Section 17021.5 requires that employee housing of six or fewer persons be deemed a single family structure with a residential land use, and be treated the same as a single-family dwelling of the same type in the same zone.</p>	<p>The City shall amend the Zoning Ordinance to include employee housing for six or fewer persons in accordance with Health and Safety Code Section 17021.5; such housing shall be treated as a residential use of property, subject to the same requirements.</p> <p>This program is carried forward into the 2013-2021 planning period. Section 3 – Housing Program – includes a program to establish provisions for employee housing.</p>
<b>Transitional and Supportive Housing</b>	
<b><u>Housing Element Law</u></b>	<b><u>2008-2014 Housing Element Program</u></b>
<p>Government Code Section 65583(a)(5) states that the Housing Element must demonstrate efforts to remove governmental constraints that hinder the City "...from meeting the need for ... supportive housing, transitional housing, and emergency shelters.... Transitional housing and supportive housing shall 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." "For example," according to HCD guidance, "if the transitional housing is a multifamily use proposed in a multifamily zone, then zoning should treat the transitional housing the same as other multifamily uses proposed in the zone."</p>	<p>HCD advises:</p> <p>If jurisdictions do not explicitly permit transitional and supportive housing as previously described, the element must include a <i>program</i> to ensure zoning treats transitional and supportive housing as a residential use, subject to only those restrictions on residential uses contained in the same type of structure.</p> <p>Program 4.0.e.5 of the <i>2008-2014 Housing Element</i> states: Zoning Ordinance revision shall establish regulations to consider transitional and supportive housing as a residential use and only subject to like restrictions on other similar residential uses in the same zone.</p> <p>This program is carried forward into the 2013-2021 planning period. Section 3 provides more details on this action program.</p>

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-33 continued  
City of Calexico  
Governmental Constraints Identified by the 2008-2014 Housing Element  
and Recommended Actions to Remove or Ameliorate the Identified Constraints**

<u>Single Room Occupancy Housing</u>	
<u>Housing Element Law</u>	<u>2008-2014 Housing Element Program</u>
<p>According to the State housing element law, the City is obligated to enact land use controls that facilitate the development of a variety of housing types. Among these housing types are single room occupancy units (SROs). Government Code Section 65583(c)(1) states:</p> <p>Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including ... <i>single-room occupancy units</i></p>	<p>Program 4.0.e.5 of the <i>2008-2014 Housing Element</i> states: The allowance for Single Room Occupancy (SRO's) shall be encouraged and facilitated through identification of potential locations and through City assistance with grant writing for the development of SRO projects.</p> <p>This action will be carried forward into the 2013-2021 planning period. However, it will be modified to include SRO definitions, development standards, and the zones in which this housing type will be permitted. Section 3 provides more details on this action program.</p>
<u>Emergency Shelters</u>	
<u>Housing Element Law</u>	<u>2008-2014 Housing Element Program</u>
<p>Government Code Section 65583(a)(4)(A) requires the City to identify –</p> <p>... a zone or zones where emergency shelters are allowed as a permitted use without a conditional use permit or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter.... except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter.</p> <p>If the local government cannot identify a zone or zones with sufficient capacity, the local government shall include a program to amend its zoning ordinance to meet the requirements of this paragraph within one year of the adoption of the housing element." [emphasis added]</p>	<p>Program 4.0.e.6 of the <i>2008-2014 Housing Element</i> states: In accordance with SB2, adopt a Zoning Ordinance amendment to define emergency shelters, to specify development and management standards and to permit emergency shelters by right in the RA, High Density residential district. The proposed ordinance amendment will demonstrate that proposed permit processing, development, and management standards encourage and facilitate the development of, or conversion to, emergency shelters.</p> <p>Zoning Ordinance provisions for emergency shelters will be enacted prior to adoption of the <i>2013-2021 Housing Element</i> by the City Council.</p>

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-33 continued  
City of Calexico  
Governmental Constraints Identified by the 2008-2014 Housing Element  
and Recommended Actions to Remove or Ameliorate the Identified Constraints**

<b>Reasonable Accommodations</b>	
<b><u>Housing Element Law</u></b>	<b><u>2008-2014 Housing Element Program</u></b>
<p>Government Code Section 65583(c)(3) requires a housing element to provide for reasonable accommodations for housing for disabled persons. The California Attorney's General Office and the federal Departments of Justice and Housing and Urban Development have advised cities to adopt a reasonable accommodation procedure. This procedure permits disabled persons or their representatives to request exceptions from the standards contained in the Zoning Ordinance, other land use regulations and the Building Code.</p>	<p>Program 4.0.e.3 of the <i>2008-2014 Housing Element</i> states: Adopt by Resolution a Reasonable Accommodation Policy for persons with disabilities that allows for administrative approval of handicapped accessible needs. Such policy will provide simple forms for applicants to fill out and for staff to process. The policy shall also outline procedures for processing requested exceptions in zoning and land use regulations for housing for persons with disabilities. Staff will provide assistance to applicants with the forms. This program is carried forward into the 2013-2021 planning period. Section 3 provides program details.</p>
<b>Family Definition</b>	
<b><u>Fair Housing Law</u></b>	<b><u>2008-2014 Housing Element</u></b>
<p>To comply with fair housing laws, a definition of "family" must emphasize the functioning of the members as a cohesive household:</p> <ul style="list-style-type: none"> <li>▪ A definition should not distinguish between related and unrelated persons.</li> <li>▪ A definition should not impose numerical limitations on the number of persons that may constitute a family.</li> </ul>	<p>The current Housing Element found that the family definition does not make provision for employee housing. However, the family definition also places a five-person limit to unrelated persons occupying a housing unit. The Zoning Ordinance defines family as follows: "Family means an individual or two or more persons related by blood, marriage or adoption, or a group of not more than five persons, excluding servants, not related by blood, marriage, or adoption, living together as a single housekeeping unit in a single dwelling unit."</p> <p>The Zoning Ordinance correctly excludes persons residing in a licensed residential care facility from the occupancy limit. It states: "Family shall also mean the persons living together in a licensed residential facility as that term is defined in California Health and Safety Code Section 1502(a) (1), which services six or fewer persons, including the licensee, the members of the licensee's family, and persons employed as facility staff."</p> <p>The Planning Commission on October 28, 2013 approved a zoning text amendment that eliminated the reference to an occupancy limit. The City Council will hold a public hearing on the revised definition on December 3, 2013.</p>

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-33 continued  
City of Calexico  
Governmental Constraints Identified by the 2008-2014 Housing Element  
and Recommended Actions to Remove or Ameliorate the Identified Constraints**

<u>Density Bonus Ordinance</u>	
<u>Density Bonus Law</u>	<u>2008-2014 Housing Element Program</u>
<p>The State of California enacted significant changes to the state's density bonus law, which went into effect on January 1, 2005. The legislation, SB 1818 introduced by Senator Hollingsworth (chaptered as Government Code Sections 65915-65918) requires cities and counties to overhaul their ordinances to bring them into conformance with new state mandates.</p> <p>The new law significantly reduces the number of units a developer must provide in order to receive a density bonus and requires cities and counties to provide between one to three concessions, depending upon the percentage of affordable units that the developer provides. It also imposes a new land donation rule, and statewide parking standards.</p>	<p>Program 4.0.b.5 of the 2008-2014 Housing Element states: Revise the Zoning Ordinance to adopt a Density Bonus Ordinance according to current State Law.</p> <p>This program is carried forward into the 2013-2021 planning period. Section 3 provides more details on this action program.</p>

**3. GOVERNMENTAL FACTORS FOUND NOT TO BE CONSTRAINTS BY THE 2008-2014 HOUSING ELEMENT**

**a. Land Use Controls**

1. Land Use Element

The Land Use Element provides for five residential designations:

- Rural Residential                      0.5 to 1 dwelling units per net acre
- Low Density Residential              1 to 5 dwelling units per acre
- Medium Density Residential        5.1 to 12 dwelling units per acre
- High Density Residential            12.1 to 20 dwelling units per acre
- Residential Specific Plan          applied to land not yet annexed to the City

2. Zoning for a Variety of Housing Types

HCD indicates that a zoning ordinance must make provisions for:

Multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.

Table A-34 demonstrates that the Zoning Ordinance provides for a variety of housing types.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-34  
City of Calexico  
Zoning Ordinance Provisions Promoting a Variety of Housing Types**

	RR	R-1	RC	RA	R-2
Single-family dwellings	P	P	P	P	P
Two-family dwellings	X	C	P	P	P
Second single-family dwelling on the same lot as an existing single-family dwelling (See Section 17.03.130(A)(3) of the Zoning Code)	C	C	C	C	C
Mobilehomes on individual lots, and permanent foundations which are certified under the National Mobilehome Const. and Safety Standards Act of 1974 and which were constructed after Oct. 1976	P	P	X	X	X
Multiple dwellings:					
Rental	X	X	P	P	C
Condo conversions	X	X	C	X	X

The 2013-2021 *Housing Element* includes a program to amend the Zoning Ordinance to make provisions for:

- Transitional Housing
- Supportive Housing
- Single Room Occupancy Housing
- Employee Housing

**3. Residential Development Standards**

Table A-35 shows the development standards for the five residential zones, as follows:

- Maximum building height
- Minimum lot width
- Front, side and rear yard setbacks
- Minimum lot size
- Maximum density (units per acre)
- Parking spaces per unit

The 2006-2014 *Housing Element* found that the development standards did not contain any unduly restrictive provisions. Building height, setbacks, lot areas, and parking are generally within the normal range for requirements and within the range of other small cities in the region and state. As a result, no programs were adopted to revise a development standard.

With respect to minimum lot size, the City recognizes that there are lots that were originally smaller than the allowable lot size in each zoning district, typically identified as “lots of record”. These lots are subject to the provisions concerning small lots in the Zoning Ordinance. A small lot, or lot of record, that meets these provisions and was recorded before 1945, and was not created due to any violation of the law or ordinance is considered to have met the lot size requirement for that zoning district.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-35  
City of Calexico  
Development Standards by Development Zone**

Zone District	Building Height	Lot Width	Minimum Yard Setback			Min. Lot Size	Max. UPU <sup>1</sup>	Pkg. Spcs. Unit
			Front	Side	Rear			
RR	35' or 2-story, whichever is less	110	40	20	50	43,560	0.5-1	2
R-1	35' or 2-story, whichever is less	60 interior 65 corner	25	5	20	6,000	1.1-5	2
RC	35' or 2-story, whichever is less	60 interior 65 corner	25	15	20	6,000	12-20	1.0
RA	35' or 2-story, whichever is less	60 interior 65 corner	25	10	10	6,000	20-30	1.0
R-2	35' or 2-story, whichever is less	60 interior 65 corner	25	5	20	6,000	5.1-12	1.0

<sup>1</sup>Refers to Units Per Acre (UPA)

Source: City of Calexico Zoning Ordinance. Section 17.03.120, Property Development Standards, Minimum and Maximum Densities Per Residential Zone

4. Maximum Building Coverage and Housing Unit Sizes

The maximum building coverage for the residential zones is as follows:

- RR: 35%
- R-1: 40%
- RC: 50%
- RA: 50%
- R-2: 50%

The Zoning Ordinance does not establish minimum or maximum housing unit sizes.

5. Open Space Requirements

Section 17.03.130 B. of the Zoning Ordinance requires:

In the RC, R-2 and RA zones, including the conversion of apartments to condominiums a minimum of two hundred square feet of private open area per ground floor unit shall be provided and a minimum of one hundred fifty square feet of private open space for units contained wholly on the second story shall be provided.

The following recreation facilities shall be provided at a minimum unless waived by the planning commission:

- Landscaped park-like quiet area;
- Children's play area;
- Family picnic area; and
- Swimming pool with cabana or patio cove

## **APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

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A minimum of thirty-five trees per gross acre shall be required as part of the landscaping requirements; twenty percent shall be twenty-four inch box size or larger, seventy percent shall be fifteen gallon size and ten percent shall be five gallon size. Drought tolerant species with low maintenance requirements shall be utilized, where possible.

These standards have not unduly constrained the supply or cost of housing in Calexico.

### **6. Parking Requirements**

For single-family dwellings in the RR and R-1 zones, two covered off-street parking spaces per dwelling unit are required. In the medium density and high density residential zones, the requirement is 1 space for each dwelling unit for one bedroom units, 1.5 spaces for 2 bedroom units, and 2 spaces for 3 bedroom units.

In multifamily districts, including both the RC and the RA zones, covered spaces (approximately half of the overall requirement) are additionally required to be garages or carports, as opposed to single-family homes where 100% of the off-street parking (2 spaces per dwelling unit) is required to be covered. The City allows the flexibility on multi-family projects to allow the construction of carports only to satisfy the covered parking requirement.

Covered spaces do not require any more land than open uncovered spaces, but the cost of construction will add an incremental amount to the overall cost of the project. The requirement has no effect on the City's ability to achieve the maximum permitted densities because no additional acreage is required to build the necessary parking. All parking facilities must have adequate lighting and must have landscaping.

The prior Housing Element found that parking standards did not pose a constraint to the development of housing. As a result, no programs to reduce parking were included in the *2008-2014 Housing Element*. This same conclusion can be reached for the Housing Element Update as no changes were made to the parking standards.

### **7. Moratoria and Prohibitions Against Multifamily Housing**

The City has not adopted moratoria or other prohibitions that would impede the development of multifamily housing.

### **8. Growth Controls and Urban Growth Boundaries**

The City has not adopted growth control measures. The urban growth boundary coincides with the official Sphere of Influence (SOI). The Sites Inventory and Analysis (Part C of Appendix A) describes the sites within the City and SOI which accommodate the City's share of the regional housing need.

### **b. Building Codes and Their Enforcement**

Compliance with Building Code standards protects the health, safety and welfare of residents and ensures that the buildings retain their structural integrity. The City has adopted the 2010 California Building Code (CBC). No amendments were made to the CBC.

New structures must conform to the standards of the CBC. The intent of the codes is to ensure structural safety, safe, sound and energy efficient buildings, including dwellings. Calexico

## APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS

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Building and Safety Department staff is responsible for enforcing state and local regulations. The City has not adopted any amendments to this code. Compliance with Building Code standards often adds to the cost of construction, but is necessary to protect the health, safety and welfare of occupants. Building Permit compliance ensures that buildings maintain their structural integrity and protect life and limb. Such requirements ensure safe, habitable structures.

The City maintains a program of inspection and enforcement with its Code Enforcement Officer. Housing Rehabilitation staff works closely with the Building and Safety Department and Code Enforcement Department on a proactive basis to identify substandard and dilapidated housing conditions. When these are reported to Housing Rehabilitation staff, property owners will be contacted and offered financial assistance to correct any code violations.

Since the City approved the *2008-2014 Housing Element*, the most recent model codes have been adopted. The prior element found that the codes adopted by the City did not constrain the maintenance, improvement, or development of housing for all income levels. This same conclusion can be reached for the Housing Element Update as only the most recent model codes have been adopted since the prior element was certified by HCD.

### **c. On- and Off-Site Improvements**

For residential projects, the City requires both on- and off-site improvements, including curb/gutter and drainage facilities, sidewalks, paved streets, landscaping, and water and sewer service. Such improvements are required as a condition of the subdivision map, or if there is no required map, improvements are required as part of the building permit. These on- and off-site improvements promote the health, safety, and general welfare of the public.

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

- Arterial: 100-foot right-of-way,
- Residential Collector: 80-foot right-of-way
- Residential Sub-Collector: 60-foot right-of-way
- Residential: 60-foot right-of-way

Arterials, collectors, and residential streets are designated by the Circulation Element according to existing and projected needs. Developers are responsible for the development of roadways associated with their residential project. Development impact fees, as per Ordinance 1036, are in place to pay a development's fair share of costs for infrastructure needs, including traffic, fire, parks and recreation, water, sewer, and other public facilities.

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

Development of, and connection to, municipal water and sewer services are required as a condition of approving tract maps. Water service is necessary for a constant supply of potable

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water. Sewer services are necessary for the sanitary disposal of wastewater. These off-site requirements allow for the development of much higher residential densities.

**d. Fees and Exactions Required of Developers**

Impact fees are charged to the developer in the form of per unit fees, collected at building permit issuance. Table A-36 lists the per unit fees for multi-family and single-family residential uses.

**Table A-36  
City of Calexico  
Development Impact Mitigation Fees (Per Unit)**

Impact Fee Category	Per Unit Fees	
	Multi-Family	Single-family
Public Facilities Impact Fees	\$380	\$442
Library Facilities	\$637	\$741
Police	\$569	\$662
Fire	\$592	\$689
Park and Recreation	\$1,261	\$1,438
Traffic	\$932	\$1,084
Water	\$3,081	\$3,586
Sewer	\$2,397	\$2,790
Art in Lieu	Based on Valuation (See Below)	Based on Valuation (See Below)
Administration	\$82	\$84
Operational Development Fee (Imperial County)	\$378 per unit	\$496 per unit

Source: Calexico Planning, Building, Safety and Engineering Departments and Imperial County, AQCD.

The City of Calexico has an “Art in Public Places” program by which developers can incorporate “art” (as defined in the City ordinance) into the design of their construction or pay an in lieu fee to contribute towards future art in the City. If the developer chooses to pay the in lieu fee, it is calculated at a rate equal to 1/8 of 1% of the project valuation.

The “Operation Development (OD) Fee” is charged by the Imperial County Air Pollution Control District. This fee is charged for commercial and major residential projects. According to Imperial County APCD staff, the OD Fee applies to single-family projects requiring a tentative map, i.e. 5 or more units. Affordable multi-family projects are exempt from the fee.

The Calexico Unified School District serves the City of Calexico and the surrounding unincorporated areas of Imperial County. The School District assesses a school impact fee on all new residential development, both multi-family and single-family or, \$5.74 per square foot. The fee for residential land can add significantly to the cost of development. Currently, exemptions from the school impact fee are not allowed; however, the school board may be open to considering requests for exemption from the fee.

Fees charged for a typical single-family dwelling unit (approximately 1,300 square feet) that is part of a subdivision, amount to \$13,450.00 plus the school district fee and the County OD Fee.

## **APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

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For a home valued at \$200,000, the City fees 6.7% of the value or cost. For a home valued at \$300,000, the City fees represent 4.5% of the value or cost.

For a typical multi-family project (a 4-unit project in this case), the total fees charged amount to approximately \$43,575, plus school district and County OD fees. The per unit fees are about \$11,000 and would more than likely represent about 4% to 7% of the development costs. Smaller infill projects are exempt from the OD Fee.

For all typical examples listed, the assumption is that no entitlements are required. Cost associated with any required entitlements would be in addition to the amounts cited above. The sites included in the Sites Inventory and Analysis (part C of Appendix A) are either approved or zoned for the appropriate residential use at the appropriate density. This means they are consistent with the General Plan and Zoning Map and only require a site plan review process.

Required public works infrastructure improvements vary greatly from project to project. The improvements are dependent on the amount of existing improvements and the nature of the project. However, at a minimum, projects are required to install improvements required to serve their project in order to not overburden the City's systems, and continue to provide for future growth. Developers are not subject to exactions for building, for example, parks. Instead, development impact fees are charged to pay for improvements.

### **e. Local Processing and Permit Procedures**

Typically, proposed projects are submitted to the City, for an initial administrative review by Planning, Building, and Public Works staff. The project applicant is provided with feedback during this initial evaluation and notified of the general procedures and provided with an estimate of the time it will take to process. The time required to process a project can vary depending on the project complexity and the level of review required.

Where a project requires Planning Commission and City Council review, such as for Rezoning, Annexation and General Plan Amendments, for both single-family and multi-family projects, a total processing time of approximately 100 days is required, with an outside maximum review time of 150 days. It should be noted that State of California required CEQA environmental review will add additional processing time. The completion of an EIR may add as much as one year to 18 months to the overall approval time required.

Callexico encourages the joint processing of related applications for a single project in order to streamline the review process. Applications for rezoning may be reviewed in conjunction with the required site plan, a tentative tract map, or any other necessary applications. A Tentative subdivision map does not need City Council approval; however, if it is being reviewed as part of a larger application package with other discretionary items, it would go before the City Council along with the other items. Other small scale projects that are consistent with General Plan and Zoning Ordinance do not require anything other than staff level review.

Table A-37 below outlines the development review and approval procedures for residential developments, as well as typical processing times for each type of entitlement. Both single family residential and multiple family residential projects are ministerial projects, when located in the appropriate single family and multiple family districts, and no discretionary permit is required. The permit issuance time in such cases is between 2 weeks and 2 months.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

Site plan review is a staff level review process that typically takes between two (2) weeks and 30 days to complete. Site plans are submitted to the Planning Division for purposes of demonstrating that a proposed development conforms to the development standards regarding density, height, setbacks, floor area ratios, and the like. The Director is authorized to approve or deny the site plan. Project applicants may appeal the Director’s decision to the Planning Commission.

**Table A-37  
City of Calexico  
Typical Processing Procedures by Project Type**

	Single Family Unit	Single Family Subdivision	Multiple Family Subdivision
List of Typical Approval Requirements	Initial Administrative Review	Initial Administrative Review	Initial Administrative Review
	Zoning Review	Zoning Review	Zoning Review
	No Site Plan Review	Site Plan Review	Site Plan Review
	Building Permit and Plan Check	Building Permit and Plan Check	Building Permit and Plan Check
Total Estimated Processing Time	2 Weeks to 2 Months	100-150 Days	100-150 Days
	No CEQA	CEQA Environmental Review – Time per State law	CEQA Environmental Review – Time per State law

Source: Calexico Planning, Building, Safety and Engineering Departments

To reiterate, the sites included in the Sites Inventory and Analysis (part C of Appendix A) are either approved or zoned for the appropriate residential use at the appropriate density. This means they are consistent with the General Plan and Zoning Map and only require a site plan review process. Proposed developments of the lower income housing sites only would be required to prepare a site plan and have it reviewed by staff.

**f. Housing for Disabled Persons**

According to HCD:

Housing element law requires that in addition to the needs analysis for persons with disabilities, the housing element must analyze potential governmental constraints to the development, improvement and maintenance of housing for persons with disabilities, demonstrate local efforts to remove any such constraints and provide for reasonable accommodations for persons with disabilities through programs that remove constraints.

Table A-38 presents an analysis of the Zoning Ordinance provisions pertaining to housing for disabled persons, as follows:

- Reasonable Accommodation Procedure
- Definition of family
- Group homes housing 6 or fewer persons
- Group homes housing 7+ persons

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

- Siting/Separation Standards for Licensed Group Homes
- Parking Standards for Housing for Disabled Persons
- Permits and Processing
- Building Code

**Table A-38  
City of Calexico  
Zoning Ordinance Provisions Pertaining to Housing for Disabled Persons**

Actual or Potential Constraint	CA State Law	Zoning/Bldg Code Provision
Reasonable Accommodations Procedure (RAP)	California Attorney General and Federal Dept. of Justice (DOJ) recommend cities to adopt a RAP. Government Code Section 65583(c)(3) requires the City to provide reasonable accommodation for housing for persons with disabilities.	The Zoning Ordinance does not contain a reasonable accommodation procedure. Therefore, Program #12 in Section 3 will result in amending the Zoning Ordinance to include such as procedure.
Definition of Family	CA fair housing laws prohibit definitions that refer only to related persons or establish a maximum number of people comprising a family.	The Zoning Ordinance includes the following provision: "Family shall also mean the persons living together in a licensed residential facility as that term is defined in California Health and Safety Code Section 1502(a) (1), which services six or fewer persons, including the licensee, the members of the licensee's family, and persons employed as facility staff." This provision is consistent with fair housing laws.
<p>Group Homes Housing 6 or Fewer Persons include:</p> <ul style="list-style-type: none"> <li>➤ Intermediate Care Facilities for People w/Developmental Disabilities-H &amp; SC § 1267.8</li> <li>➤ Housing for Disabled People/Children-H &amp; SC § 1566.3</li> <li>➤ Residential Care Facilities for the Elderly-H &amp; SC § 1569.85</li> <li>➤ Alcoholism/Drug Treatment Facilities-H &amp; SC § 11834.23</li> <li>➤ Residential Facilities for Persons with Chronic Illnesses-H &amp; SC § 1568.0831</li> </ul>	Under CA laws group homes housing 6 or fewer people and licensed under the Health and Safety Code (H & SC) must be permitted in all zones that permit single family homes.	The Zoning Ordinance does not define licensed group homes or list them as uses permitted in the zones that allow single family dwellings. Program #12 will produce zoning provisions consistent with State law.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-38 continued  
City of Calexico  
Zoning Ordinance Provisions Pertaining to Housing for Disabled Persons**

Actual or Potential Constraint	State Law	Zoning Code Provision
Group Homes Housing 7+ Persons	Case laws allow cities to require a conditional use permit (CUP) for group homes housing 7 or more people. <sup>1</sup>	The Zoning Ordinance provides that “group residential” is a conditionally permitted use in the residential zones. Therefore, group homes housing 7 or more persons would be permitted through the CUP process.
Siting/Separation Standards for Licensed Group Homes	H & SC § 1520.5 requires facilities licensed by the CA Dept. of Social Services to be 300’ away from a like facility.	The City has not adopted and therefore does not enforce a siting/separation standard different than the State. The Zoning Ordinance and Land Use Element do not impose siting requirements for special needs housing.
Parking Standards for Housing for Disabled Persons	CA law does not establish statewide parking standards.	The City’s parking standards are established for a use, not the occupants of housing. The Reasonable Accommodations Procedure will allow disabled people or their representatives to request a reduced parking standard.
Permits and Processing	CA law establishes that group homes housing for 6 or fewer persons are allowed by right in zones that permit single family homes.	The Zoning Ordinance will be amended to permit by right licensed group homes in all zones that permit single family homes.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-38 continued  
City of Calexico  
Zoning Ordinance Provisions Pertaining to Housing for Disabled Persons**

Actual or Potential Constraint	State Law	Zoning Code Provision
Building Code	CA State establishes building permit requirements and accessible housing unit requirements. CA State law establishes standards for building construction.	The City has adopted and enforces the 2010 California Building Code. Structural retrofits require a building permit. Non-structural retrofits do not require a building permit. No local amendments have been made that diminish the ability of housing to accommodate disabled persons. The Reasonable Accommodations Procedure will allow requests to modify the “development and use” of housing. The City has not adopted universal design elements.

<sup>1</sup>Barbara Kautz, Goldfarb & Lipman LLP, *Select California Laws Relating to Residential Recovery Facilities and Group Homes*, pg. 3, (presented at the Residential Recovery Facilities Conference, Newport Beach, March 2, 2007)

California law does not prohibit requiring a use permit for facilities of 7 or more persons (e.g., Health and Safety Code § 11834.23). Alene M. Taber, Esq., AICIP and Michael J. Alti, Esq., Jackson, Demarco, Tidus & Peckenpaugh, *Residential Recovery Homes and Their Local Impacts*, page 11, (presented at the Residential Recovery Facilities Conference, Newport Beach, March 2, 2007)

<sup>2</sup>§ 18.100.050 establishes procedures for processing a Minor Use Permit. Applications for Minor Use Permits are submitted to the Community Development Department for uses allowed as minor uses in the applicable zone. The Community Development Director may approve a Minor Use Permit, approve with conditions, or deny the permit. In granting a Minor Use Permit, the Director shall make the following findings:

- a. That the proposed use is consistent with the General Plan;
- b. That the proposed use is not contrary to the objectives of this Zoning Code or to the objectives of the applicable regulations;
- c. That the proposed use will be located, operated, and maintained in a manner consistent with the policies of the General Plan and the provisions of this Zoning Code;
- d. That the proposed use will not be detrimental to the property or improvements in the surrounding area or the public health, safety, or general welfare.

If denied, an applicant can file an appeal to the Planning Commission.

**g. Ability to Meet the City’s Share of the Regional Housing Need**

The element must describe constraints, if any, that hinder the City from meeting its share of the regional housing need, which is 3,034 housing units for the 2014-2021 time period. The sites inventory and analysis demonstrate that there are sufficient sites to accommodate the City’s share of the regional housing need.

There are no local governmental constraints that would prevent the City from meeting its share of the regional housing need. The non-governmental constraints such as the cost of land and construction do create constraints on the development of housing affordable to lower income levels.

**F. PROGRESS REPORT**

**1. INTRODUCTION**

HCD suggests that the Progress Report (officially known as review and revision) discuss:

*"Appropriateness of goals, objectives and policies"* (Section 65588(a)(1)): A description of how the goals, objectives, policies and programs of the updated element incorporate what has been learned from the results of the prior element.

*"Effectiveness of the element"* (Section 65588(a)(2)): A comparison of the actual results of the earlier element with its goals, objectives, policies and programs. The results should be quantified where possible (e.g., rehabilitation), but may be qualitative where necessary (e.g., mitigation of constraints).

*"Progress in implementation"* (Section 65583(a)(3): An analysis of the significant differences between what was projected or planned in the earlier element and what was achieved.

**2. APPROPRIATENESS OF GOALS AND POLICIES**

The *2008-2014 Housing Element* includes eight goals and 55 policies in seven categories:

- Housing Availability and Production 8 policies
- Housing Conservation and Improvement 11 policies
- Opportunities for Energy Conservation 5 policies
- Equal Housing Opportunities 8 policies
- Removing Constraints 6 policies
- Housing Affordability 14 policies
- Preserving Affordability 3 policies

Generally speaking, the goals and policies remain appropriate for the 2013-2021 planning period. As a result, the *2013-2021 Housing Element* incorporates the vast majority of the goals and policies and organizes them per the seven Government Code mandated program categories. Goals and policies which reference the Calexico Redevelopment Agency have been deleted.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**3. IMPLEMENTATION PROGRESS AND EFFECTIVENESS OF THE 2008-2014 HOUSING ELEMENT**

Table A-39 (pages A-57 to A-62) describes the implementation progress and effectiveness of the *2008-2014 Housing Element*.

The prior element included 55 individual programs many of which were already stated as policies. The *2013-2021 Housing Element* reduces the number of programs by consolidating them and organizing them according to the Government Code mandated program categories. As explained in the Sites Inventory and Analysis, the City has approved developments that can accommodate the City's share of the regional housing need. The continued implementation of programs to improve the housing stock and to develop affordable housing has been impeded by the State mandate to dissolve the Calexico Redevelopment Agency.

**Table A-39  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

<b>Program Description</b>	<b>Accomplishments/Effectiveness</b>
<b>Program Category 1: Housing Availability and Production</b>	
1. Utilize the City's General Plan and Zoning Ordinance to provide adequate, suitable sites for the construction of new housing, reflecting a variety of housing types and densities.	This program was accomplished for the <i>2013-2021 Housing Element</i> .
2. Zoning Ordinance revision to revise Second Dwelling Unit provisions that will eliminate the need for Conditional Use Permit or other discretionary approvals in all residential zones, in accordance with State law.	Program #4 in Section 3 states that the City will revise the Second Unit zoning provisions to comply with Government Code Section 65852.2(a)(3) which requires an application for a second-unit permit to be considered ministerially without discretionary review.
3. Zoning Ordinance revision to appropriately define a "boarding room" and "family" to ensure compliance with California Health and Safety Code Section 1502(a)(1).	The Planning Commission on October 28, 2013 approved a zoning text amendment that eliminated the reference to an occupancy limit. The City Council will hold a public hearing on the revised definition on December 3, 2013. The family definition does not conflict with the following definition: "Boarding or rooming house" means a building containing a dwelling unit where lodging is provided with or without meals for compensation for five or more persons.
4. Continue to use zoning and other land use controls to ensure the compatibility of residential areas with surrounding commercial and other non-residential uses.	Accomplished as an ongoing policy of the City.
5. Revise the Zoning Ordinance to adopt a Density Bonus Ordinance according to current State Law.	Not accomplished. Included in Section 3 – Housing Program – of the <i>2013-2021 Housing Element</i> .

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

<b>Program Description</b>	<b>Accomplishments/Effectiveness</b>
<b>Program Category 1: Housing Availability and Production continued</b>	
6. Rezone a total of approximately 30 acres to RA, at a minimum density of 20 units per acre, and to allow a minimum of 16 units per site.	Accomplished through the Estrada re-zoning. 33.09 acres re-zoned on October 19, 2010.
7. Apply for grant programs, such as the HOME and CDBG Programs for the reconstruction and/or rehabilitation of lower income, including extremely low-income owner/renter occupied housing units.	The City has received both CDBG and HOME funds. Two affordable developments with a total of 100 housing units were awarded State HOME funds.
8. Work with LAFCO to expand the City limits to include acreage rezoned in accordance with the needs for Low Density, Medium Density, and High Density as needed to satisfy the RHNA, as development proposals are received.	Accomplished as an ongoing policy of the City. The Sites Inventory and Analysis shows that there are sufficient sites to meet the RHNA. One site is located in the Sphere of Influence.
9. Continue to utilize environmental and other development review procedures to ensure that all new residential developments are provided with adequate public and private facilities and services.	Accomplished as an ongoing policy of the City.
10. Regularly update and make available to housing developers the inventory of vacant land suitable for residential development compiled during this Housing Element Update. The data will be continuously posted on the City's web site and available in hard copy on request.	Accomplished as an ongoing policy of the City and as a part of the <i>2013-2021 Housing Element</i> .
11. Continue to update elements of the General Plan, as needed.	General Plan Elements will be updated after the Sustainable Communities Planning Grant is completed.
12. Identify infrastructure and service limitations, which inhibit housing development and identify programs and sources to address short-term and long-term needs.	Accomplished as part of LAFCO's Service Area Plan (SAP) for the City of Calexico.
13. Process a Zoning Ordinance revision to increase the height limitation in the RA High Density zoning district to allow for a 3-story height, not to exceed 45-feet. The allowable height in the RC districts for projects 15 to 20 UPA shall also be 3-story, not to exceed 45 feet.	The Zoning Ordinance was not amended to increase the height limit in the RA and RC zone districts. The City approved a 3-story affordable housing rental development - El Quintero. It is located in the Downtown. Program #2 in Section 3 includes a 3-story height limit among the incentives to promote infill and mixed-use development in Downtown Calexico.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

<b>Program Description</b>	<b>Accomplishments/Effectiveness</b>
<b>Program Category 2: Housing Conservation and Improvement</b>	
1. Continue to publicize and provide financial assistance in the form of low interest and deferred payment loans for the rehabilitation of residences owned and/or occupied by lower income households.	The City has an active housing rehabilitation program that is advertised on its website.
2. City will design and staff an informational kiosk within City Hall to coincide with City bill payment due dates to take advantage of the large percentage of people paying bills in person at the City Hall location.	The staff determined that it was not necessary to establish a kiosk. The community is well informed about the City's housing programs.
3. Continue to allow for the construction of bedroom additions with financial assistance from the City's residential rehabilitation program, when needed to eliminate overcrowding.	Accomplished as an ongoing policy of the City's housing programs.
4. Continue to monitor housing conditions throughout the City, while periodically (i.e. every 5 years) conducting formal housing condition surveys.	Another housing condition survey was not completed after adoption of the Housing Element (April 20, 2010). This program suggests the City would do another survey in mid-year 2015. Due to staff cutbacks and the lack of financial resources it is not likely that a housing condition survey can be conducted in 2015.
5. Cause the removal of dilapidated units, which cannot be rehabilitated, through enforcement of applicable provisions of the Uniform Housing and Revenue and Tax Codes.	The housing code enforcement staff enforces these code provisions.
6. As funding permits, evaluate future opportunities to expand code enforcement efforts utilizing new methods of eliminating unsightly property conditions in residential areas.	No new, additional funding has become available to expand code enforcement activities.
7. Continue to provide information and technical assistance to local property owners regarding housing maintenance.	Technical assistance is provided as part of the housing code enforcement process.
8. Avoid displacement of residents in carrying out CDBG funded activities, whenever possible, or otherwise provide appropriate relocation assistance.	The City has not engaged in CDBG funded activities that cause displacement. Tenant based rental assistance was provided to persons displaced by the April 2010 earthquake.
9. Continue to utilize the City's General Plan and Zoning Ordinance to prevent the encroachment of incompatible uses into established residential areas.	Accomplished as an ongoing policy of the City's housing programs.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

<b>Program Description</b>	<b>Accomplishments/Effectiveness</b>
<b>Program Category 3: Energy Conservation</b>	
1. Utilize the development review process to incorporate energy conservation techniques in the siting and design of proposed residences.	Accomplished as part of the development review procedures.
2. Adopt a green building ordinance to encourage the incorporation of more stringent energy conservation techniques in building and development projects in the City.	The City has adopted the State code.
3. Continue to require that all new residential development complies with the energy conservation requirements of Title 24 of the California Administrative Code.	Accomplished as part of the plan check review process.
4. Continue to allow energy conservation measures, as improvements eligible for assistance under the City's residential rehabilitation program, including repairs to faulty plumbing, hazardous structural and safety improvements, roofing, and windows.	Energy conservation improvements are encouraged as part of the housing rehabilitation effort.
5. Assist in distributing information to the public regarding free home energy audits and other programs of the Imperial Irrigation District (IID).	Information is posted on the City's website and on the IID website.
<b>Program Category 4: Equal Housing Opportunity</b>	
1. Provide outreach material on state and federal fair housing laws and direct complaints of housing discrimination to appropriate enforcement agencies.	Housing staff is working with the Inland Fair Housing and Mediation Board to obtain outreach materials.
2. Continue to allow the removal of architectural barriers with funding from the City's Residential Rehabilitation Program in order to provide barrier-free housing for handicapped or disabled persons.	Home modifications are an eligible activity under the provisions of the Housing Rehabilitation Loan Program.
1. Adopt by Resolution a Reasonable Accommodation Policy for persons with disabilities that allows for administrative approval of handicapped accessible needs.	Not yet adopted. Included as an action program of the <i>2013-2021 Housing Element</i> .
4. Continue to enforce the handicapped accessibility requirements of Federal fair housing laws that apply to all new multifamily residential projects containing four (4) or more units.	Accomplished as part of the plan check process.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

Program Description	Accomplishments/Effectiveness
<b>Program Category 4: Equal Housing Opportunity continued</b>	
5. Zoning Ordinance revision shall establish regulations to consider transitional and supportive housing as a residential use and only subject to like restrictions on other similar residential uses in the same zone.	Not yet adopted. Included as an action program of the <i>2013-2021 Housing Element</i> .
6. Adopt a Zoning Ordinance amendment to define emergency shelters, to specify development and management standards and to permit emergency shelters by right in the RA, High Density residential district.	Not yet adopted. Zoning provisions will be enacted prior to City Council adoption of the <i>2013-2021 Housing Element</i> .
7. Amend the Zoning Code to revise the definition of "Family" to include employee housing for six or fewer persons in accordance with Health and Safety Code Section 17021.5.	Not yet adopted. Included as an action program of the <i>2013-2021 Housing Element</i> .
<b>Program Category 5: Removing Constraints</b>	
1. Periodically reexamine the Zoning Ordinance (i.e., every 5 years) for possible amendments to reduce housing construction costs without sacrificing basic health and safety considerations.	Not yet accomplished. Zoning Ordinance update underway.
2. Periodically review (i.e., every 2 years) the performance of local lending institutions with regard to the Home Mortgage Disclosure Act (HMDA) and the Community Reinvestment Act (CRA).	Accomplished as part of the 2013-2021 Housing Element.
3. Periodically survey (i.e., every 5 years) other cities in the Imperial County area to ensure that Calexico development fees are set to an appropriate level.	Will be accomplished when the fee schedule is next updated.
4. Continue the CRA funded program to allocate funds to defray the cost of land and/or required off-site improvements for lower income, extremely low-income housing projects.	Discontinued because the Calexico Redevelopment Agency was dissolved.
5. Encourage concurrent processing of entitlements to foster an environment conducive to business.	Accomplished as an ongoing policy of the City.
6. Monitor the Site Plan review process to ensure it does not constrain residential development.	Accomplished as part of the development review procedure.
7. Adopt a Zoning Ordinance amendment to modify the permitted density range in the RC (Medium Density) district to establish a floor density of 6.1 UPA; the new density range will be 6.1 to 20 UPA.	Density ranges have been established for each residential land use designation.

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

Program Description	Accomplishments/Effectiveness
<b>Program Category 5: Removing Constraints continued</b>	
<p>8. Adopt a Zoning Ordinance amendment to eliminate discretionary approvals, including Planning Commission and City Council approvals for projects up to the maximum permitted density of 20 UPA in the R-C zoning district and 30 UPA in the R-A zoning district, other than the regular Site Review procedure.</p>	<p>The Zoning Ordinance was not amended. Site plan review is conducted at the staff level for projects that are consistent with the Land Use Element, Zoning Map and Zoning Ordinance. The Zoning Ordinance development review procedure provides that “The director shall have the authority to approve, deny or modify applications for development review. Within fifteen calendar days of the date that application is deemed complete by the director, the director shall approve, conditionally approve, or disapprove the application, or shall request the applicant to revise said application.”</p>
<b>Program Category 6: Housing Affordability</b>	
<p>1. Explore, with local lending institutions, their possible participation in the creation of a loan pool for the construction, rehabilitation and/or purchase of housing affordable to low and moderate-income households, as a means for them to fulfill their obligations under the Federal Community Reinvestment Act.</p>	<p>Not accomplished and not included in the 2013-2021 Housing Element because of the lack of City dollars to leverage private dollars.</p>
<p>2. Continue to defer development fees for all proposed housing units affordable to lower income households.</p>	<p>Accomplished as an ongoing policy of the City.</p>
<p>3. Evaluate for implementation the use of innovative land use techniques and construction methods, e.g., clustering of units, density transfers, zero lot line development, etc. to minimize housing development costs and to maximize development opportunities.</p>	<p>Accomplished as an ongoing policy of the City.</p>
<p>4. Evaluate a Zoning Ordinance amendment for a reduced parking requirement for residential projects serving seniors, special needs groups or located close to public transportation or commercial services.</p>	<p>Included as a policy in the <i>2013-2021 Housing Element</i>.</p>
<p>5. Inform private developers of the below market interest rate mortgage programs operated by the California Housing Finance Agency (CalHFA) and direct interested developers to CalHFA, as a means to facilitate the construction of new, affordable housing for moderate income households.</p>	<p>Staff determined there was no need to pursue this program as private developers are aware of such programs.</p>

**APPENDIX A – HOUSING NEEDS, SITES, CONSTRAINTS & PROGRESS**

**Table A-39 continued  
City of Calexico  
2008-2014 Housing Element – Evaluation of Program Accomplishments/Effectiveness**

Program Description	Accomplishments/Effectiveness
<b>Program Category 6: Housing Affordability continued</b>	
6. Support the efforts of non-profit organizations, private developers, and the Imperial Valley Housing Authority to obtain State and/or Federal funds for the construction of affordable housing for lower income households	The City has actively applied for CDBG and HOME funds and supported the efforts of the Calexico Housing Authority and Imperial Valley Housing Authority to obtain additional funding.
<b>Program Category 7: Preserving Affordable Housing</b>	
1. Actively support the Calexico and Imperial Valley Housing Authorities attempts to secure additional Section 8 rental assistance to lower income households.	The City has continuously supported the CHA and IVHA in their efforts to secure additional Section 8 Vouchers.
2. Adopt a Zoning Ordinance amendment to consider for implementation procedures to prevent the displacement of lower income residents from units at risk of converting to market rate housing within 5- 10 years.	City staff has requested a legal opinion on whether it is possible to implement this recommendation.