



City of Westmorland 2021-2029 Housing Element

January 2022
City of Westmorland
355 S. Center Street
Westmorland, CA 92281

**City of Westmorland
2021-2029 Housing Element**

City Council

Xaviar Mendez, Mayor
Ana Beltran, Mayor Pro-Tem
Justina Cruz, Council Member
Ray Gutierrez, Council Member
Judith Rivera, Council Member

Consultants

Nava & Associates

Table of Contents

1. Introduction.....	4
1.1.LEGISLATIVE REQUIREMENTS.....	4
1.2 PUBLIC PARTICIPATION.....	5
2. Community Profile.....	6
2.1.DEMOGRAPHIC PROFILE	6
2.2.ECONOMIC PROFILE	8
2.3.HOUSEHOLD CHARACTERISTICS	10
2.4.HOUSING PROBLEMS	12
2.5.SPECIAL NEEDS	12
2.6.HOUSING STOCK CHARACTERISTICS	22
2.7.HOUSING COST AND AFFORDABILITY.....	23
2.8.AFFORDABLE HOUSING	25
3. Housing Constraints.....	25
3.1.MARKET CONSTRAINTS	26
3.2. GOVERNMENTAL CONSTRAINTS	27
4. Housing Resources	36
4.1 FINANCIAL RESOURCES.....	36
4.3 ADEQUATE SERVICES.....	38
5. Progress Report.....	39
5.1 INTRODUCTION.....	39
5.2 HOUSING FUNDING.....	41

1. Introduction

1.1. Legislative Requirements

The Housing Element is one of the elements required to be included in the City's General Plan. State law identifies the subjects that must be addressed in a Housing Element. These guidelines are identified in Article 10.6 of the State of California Government Code (Sections 65580 et seq.).

State law specifies that the Housing Element must assess housing needs and evaluate the current housing market in the City and then identify programs that will meet housing needs. The housing market evaluation includes a review of housing stock characteristics as well as housing cost, household incomes, special needs households, availability of land and infrastructure, and various other factors. Also included in this evaluation is the community's "Regional Housing Needs Allocation" (RHNA) which provides an estimate of the number of housing units that should be provided in the community to meet its share of new households in the region. In addition to this information, the Housing Element document must evaluate and review its past housing programs and consider this review in planning future housing strategies.

The City's previous Housing Element was adopted in 2016. Until recently, Housing Elements have been required to be updated every five years, unless otherwise extended by State law. Senate Bill 375, enacted in 2008, established an eight-year cycle for housing element updates. The statutory planning period for this Housing Element begins on October 15, 2021, and extends through October 15, 2029. However, the RHNA period begins June 30, 2021, and extends through October 15, 2029.

The 2021-2029 Housing Element is subject to review by the California Department of Housing and Community Development (HCD) for compliance with applicable State laws. A critical component of HCD's review of the Housing Element is the local jurisdiction's ability in accommodating its RHNA through land-use planning efforts. Compliance with this requirement is measured by the jurisdiction's ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Southern California Association of Governments (SCAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region.

For the 2021-2029 Housing Element update for the City of Westmorland, SCAG has assigned an RHNA of 33 units, in the following income distribution:

- Extremely Low/Very Low Income:¹ 8 units
- Low Income: 6 units
- Moderate Income: 4 units
 - Above Moderate Income: 15 units

The City must demonstrate its ability to accommodate the RHNA in this Housing Element.

1.2. Public Participation

The City of Westmorland offers ample opportunities for the public to comment on housing-related issues and on the Draft 2021-2029 Housing Element. A list of agencies and organizations contacted to participate in the planning process and a detailed summary of comments is contained in Appendix A. Due to the COVID-19 pandemic, public engagement was held virtually and by conference call.

A. Housing Element Workshops

¹ The City has an RHNA allocation of 8 very-low-income units (including extremely low-income units). Pursuant to AB 2634, the City must project the number of extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units as extremely low. Assuming an even split, the City's RHNA allocation of 8 very-low-income units may be divided into 4 very low and 4 extremely low-income units. However, for purposes of identifying adequate sites for the RHNA, State law does not mandate separate accounting for the extremely low-income category.

The City conducted two Housing Element Workshops on January 28, 2022, and March 25, 2022, to discuss the Housing Element update process and solicit stakeholder and public comments on housing issues and needs. The following topics were covered at each Workshop:

- January 28, 2022: Introduction to the Housing Element Update process, requirements, RHNA units, and possible strategies to meet RHNA.
- March 16, 2022: Review strategies to meet RHNA, including the location of sites, and review Housing Programs.
- June 1, 2022: Review Draft Housing Element, including an overview of Housing Element, strategies to meet RHNA, housing programs, AFFH findings, and next steps in the review and adoption process. Attendees were informed the draft would be available starting Friday, June 3, 2022, for public review.

Notices of the meeting were published in English and Spanish in the Imperial Valley Press, and posted at Westmorland City Hall, and the Westmorland Post Office. The notices were also posted on the City bulletin board and flyers were made available at the public counter. In addition, special invitations were sent to housing developers, advocates, community stakeholders, and agencies that serve the housing and supportive service needs of lower and moderate-income persons, as well as those with special housing needs. The meetings were attended by members of the public and representatives of the development community and nonprofit organizations.

C. Draft Housing Element Review

The City conducted a community workshop on March 16, 2022, to review the draft Housing Element. To solicit input from supportive service and housing providers, the City sent special notices of the public meeting to housing developers and professionals, as well as agencies that serve

or represent the interest of lower and moderate-income households and persons with special housing needs. The City also advertised the availability of the Housing Element for public review in English and Spanish in the Imperial Valley Press. The Draft Housing Element was then made available to the public for review beginning June 3, 2022.

D. Adoption Hearings

For the adoption of the 2021-2029 Housing Element, the City conducted public hearings before the Planning Commission and City Council in June - July 2022.

E. Summary of Public Comments and City Responses

Affordable housing, especially for lower-income, seniors, large households, and persons with disabilities are among some of the key issues raised during the public participation process of this Housing Element update. Public service providers also brought up the need for more fair housing protection for special needs groups. Not only is there a need for more affordable housing, but the housing of different types and other housing assistance like closing costs, rental assistance, neighborhood clean-up, and habitability. On the other hand, developers expressed that long processing periods and high fees were a constraint for development in the City.

The Housing Element addresses these needs through a variety of programs targeted to conserve the existing affordable housing stock, facilitating the construction of new affordable housing, and coordinate with and fund social service agencies, including organizations that support extremely low-income seniors and persons with disabilities.

2. Community Profile

The purpose of this section is to summarize and analyze the existing housing conditions in the City of Westmorland. This section contains an analysis of population trends, and employment trends, household trends, and special needs groups within the City.

2.1. Demographic Profile

When evaluating housing needs, analysis of demographic variables such as population, employment, and households is essential in order to assess the present and future housing needs of a city or county. This section presents data gathered from the following sources: U.S. Census Bureau, American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), U.S. Department of Housing and Urban Development (HUD), California Department of Housing and Community Development (HCD), California Employment Development Department, Southern California Association of Governments (SCAG), Imperial Valley Housing Authority (IVHA), DataQuick, and Craigslist.org.

A. Population Trends

Between 2000 and 2010, the population in Westmorland did not increase. As shown in the table below,

over the subsequent decade, from 2010 to 2021, the population remained the same. The City’s growth rate was also similar to most of the County’s incorporated cities. However, Imperial and Brawley both saw higher increases in population than the City of Westmorland and the County overall.

Population Trends – Westmorland and Neighboring Cities (2000-2021)

City	2000	2010	2021	Change (2010-2021)	
				# of Persons	% Change
El Centro	37,835	42,598	44,997	2,399	5.6%
Calexico	27,109	38,572	40,485	1,913	5.0%
Brawley	22,052	24,953	27,326	2,373	9.5%
Imperial	7,560	14,758	20,289	5,531	37.5%
Holtville	5,612	5,939	6,236	297	5.0%
Westmorland	2,131	2,225	2,225	0	0%
Imperial County	142,361	174,528	186,034	11,506	6.6%

Source: U.S. Bureau of the Census, 2000-2010, California Department of Finance, 2021 Population Estimates.

C. Race/Ethnicity

In 2019, the racial/ethnic composition of City residents was similar to that of County residents. As shown in the table, approximately 82 percent of the City’s population categorized themselves as Hispanic (of any race) with the remaining population identifying themselves as non-Hispanic (of one or more races). The County has a higher percentage of white people by 1.4 percent and a smaller Black or African American population.

Population by Race and Ethnicity (2020)

Category	City of Westmorland		Imperial County	
	# of Persons	% of Total	# of Persons	% of Total
Not Hispanic or Latino	383	17.2%	28,529	15.8%

White	205	9.2%	19,228	10.6%
Black or African American	85	3.8%	3,882	2.1%
American Indian/Alaska Native	24	1.1%	1,104	0.6%
Asian	7	0.30%	2,367	1.3%
Native Hawaiian/Pacific Islander	0	0.0%	240	0.1%
Other Races or 2+ Races	62	2.8%	1,708	0.9%
Hispanic or Latino (any race)	1842	82.80%	152,172	84.2%
Total	2225	100.0%	180,701	100.0%

Source: SCAG

2.2 Economic Profile

A. Employment

Employment generates income, which leads to effective housing demand and housing choices. SCAG estimates that Westmorland had a 13% increase of employed persons in 2022. Employment is projected to increase by 25% by 2025.

B. Household Income

In 2019, a significant percentage of households in the City (33.1 percent) had annual incomes less than \$25,000 per year. In that same year, households with annual incomes over \$75,000 accounted for 8 percent of total households. There were noticeable increases in the overall number and proportion of households with lower (less than \$25,000) and higher incomes (\$75,000 and greater), while the proportion of households earning middle incomes (\$25,000 to \$74,999) decreased.

Household Income (2000-2020)

Income Ranges	2020
	% of Total
Less Than \$10,000	13%
\$10,000-\$20,000	19.75%
\$20,001-\$30,000	18%
\$30,001-\$40,000	18.5%
\$40,001-\$50,000	9.75%
\$50,001-\$74,999	16.2%
\$75,000-\$99,999	4%
\$100,000+	3.8%
Total	100.0%

Source: U.S. Bureau of the Census, 2005-2019, Data USA

In 2019, Imperial County’s median income was \$53,424; the median income in the City of Westmorland was lower than the County median. The City’s median income increased by 12.2 percent - between 2019 and 2020.

For planning and funding purposes, the State Department of Housing and Community Development (HCD) categorizes households into five income groups based on the County Area Median Income (AMI):

- Extremely Low Income – up to 30 percent of AMI
- Very Low Income – 31 to 50 percent of AMI
- Low Income – 51 to 80 percent of AMI
- Moderate Income – 81 to 120 percent of AMI
- Above Moderate Income – greater than 120 percent of AMI

Combined, extremely low, very low, and low-income households are often referred to as lower-income households.

Household by Income Categories (2014-2018)

Income Group	<i>City of Westmorland</i>	<i>Imperial County</i>
Very Low (31 to 50%)	52%	27%
Low (51 to 80%)	33%	15%
Moderate (81 to 120%)	7%	14%
Above Moderate (>120%)	8%	44%

Source: SCAG RHNA Calculator, March 2021

2.3. Household Characteristics

A household is defined as all persons occupying a housing unit. Families are a subset of households and include all persons living together who are related by blood, marriage, or adoption. Single households include persons living alone in housing units, but do not include persons in group quarters such as convalescent homes or dormitories. Other households are unrelated people living together, such as roommates. Household characteristics play an important role in defining community needs. Household type, income, and tenure can help to identify special needs populations as well as other factors that affect the housing needs of a community.

A. Household Type and Size

Household types and sizes can change even in periods of static population growth as adult children leave home, married couples divorce, or with the general aging of the population. Westmorland's growth rate has been lower than the growth rate of the County.

Household size is a significant factor in housing demand. Often, household size can be used to predict the unit size that a household will select. For example, small households (one and two persons per household) traditionally can find suitable housing in units with up to two bedrooms while large households (five or more persons per household) can usually find suitable housing in units with three to four bedrooms. During the previous decade, the average household size in Westmorland remained the same.

Average Persons-Per-Household Trends (2010-2019)

Year	City of Westmorland	County
2010	5	3.34
2019	5	3.81

Source: ACS 2006-2010, pointzhomes.com

B. Housing Tenure

Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. The tenure distribution of a community’s housing stock can be an indicator of several aspects of the housing market, including the affordability of units, household stability, and residential mobility among others. In most communities, tenure distribution generally correlates with household income, composition, and age of the householder.

Households in the City of Westmorland in 2010 were almost equally split in terms of tenure, with slightly under one-half of the City’s households owning their homes and slightly over one-half renting their homes. The County, in 2010, had 11.8 percent more owners than renters. As of 2019, the City of Westmorland continues to have a lower proportion of owner-households than Imperial County (see Table 12).

Tenure (2010-2019)

Household Size	Westmorland	County
	% of Total	% of Total
2010		
Owner	47%	55.9%
Renters	53%	44.1%
2019		
Owners	38.9%	55.5%
Renters	61.1%	44.5%

2.4. Housing Problems

While the SCAG data presented in Table 8 estimates the number of households that fall within each income level, it does not provide any detail on the specific housing needs and problems faced by these households. The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census Bureau for HUD, however, provides detailed information on housing needs by income level for different types of households in Westmorland. Detailed CHAS data based on the 2013-2017 ACS data is displayed in Table 14. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

Most lower and moderate-income households cope with housing cost issues either by assuming a cost burden or by occupying a smaller-than-needed or substandard unit. Specifically, according to HUD, 70 percent of all of the City's lower-income households were experiencing one or more housing problems (e.g. cost burden, overcrowding, or substandard housing condition) between 2013 and 2017.²

² U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS) data based on 2013-2017 ACS.

A. Cost Burden

Housing cost burden is defined as a housing cost that exceeds 30 percent of a household's gross income. A severe cost burden is a housing cost that exceeds 50 percent of a household's gross income.³ Housing cost burden is particularly problematic for low and moderate-income households in that it leaves little resources for a household to pay for other living expenses.

If the City did not have affordable housing developments, Section 8 vouchers, and rental assistance, the cost burden problem would be much more severe.

³ A household spending more than 30 percent of its gross household income on housing is considered cost-burdened both by the State Department of Housing and Community Development (HCD) and the U.S. Department of Housing and Urban Development (HUD).

2.5. Special Needs

There is considerable overlap among and between extremely low-income households and special needs

populations. State law specially recognizes specific special needs population including: elderly, trail elderly, disabled persons, developmentally disabled persons, large families, female householders, and homeless persons and families.

In order to assist in the development of housing affordable extremely low-income (ELI) households The City will proactively encourage and facilitate the development of affordable housing for lower income households, particularly those with extremely low-income (ELI), special needs including large households, seniors, and households with persons who have disabilities or developmental disabilities, and farmworkers by:

- Providing regulatory incentives to developers who agree to include a portion of their units affordable to ELI households.
- Seek funding from state sources in coordination with affordable developers.
- Defer development standards to promote affordable housing development
- Modify certain development standards to promote affordable housing development. For example, reduce parking standards or covered parking requirements for senior or certain projects designed for lower-income households.
- Establish ministerial procedures to reduce parking standards for housing for special needs households (i.e., seniors, persons with disabilities)

The above program components will be implemented by mid-year 2025. The City will work in coordination with affordable housing developers such as Imperial Valley Housing Authority, Chelsea Investment Corporation and LINC Housing Corporation.

The program will be reviewed annually and implementation progress reported in the Housing Element Annual Progress Report. The Progress Report will include information on the types of households - including special needs populations - who have been assisted by specific programs. The Progress Report will be presented to the City Council and made available at City Hall and on the City's web page.

The contract planner and City Clerk will be responsible for implementation of this program. Funding sources will include the General Fund and may include CDBG, HOME, and other State funding sources.

Four other programs included in the Housing Element also will meet the needs of the special needs population who fall within the extremely low-income group but who in fact may have zero to very little income. The quantified objectives for extremely low-income households are based on individual programs that address the existing and future needs of extremely low-income households as follows:

- Imperial Valley Housing Authority Rental Assistance Program
- Density Bonus Incentives
- Developmentally Disabled Outreach Program
- Housing Rehabilitation Program

More specifically, Government Code Section 65583(c)(3) states that a housing program must:

Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.

The program shall remove constraints to, or provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.

1. Housing Needs, Goals, Policies, and Objectives

Westmorland’s analysis of governmental constraints included:

- 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

A. Seniors

Seniors, defined as persons over the age of 65 years, often age in-place, living in housing that is too expensive for their fixed incomes or that structurally does not accommodate specific needs for assistance. Even though senior citizens may have difficulty living in their own home, they often do not have the options or mobility afforded other segments of the population.

The number of seniors in Westmorland has increased over the last two decades.

Table 7: Senior Population Trends (65+) (2000-2019)

Year	# of Persons	# Change	% Change
2000	3,529		
2010	4,556	1,027	29.1%
2019	5,874	1,318	28.9%

Source: U.S. Bureau of the Census, 2000-2010, ACS 2015-2019

As documented in Table 14, elderly households in the City (particularly those that rented their homes) were especially likely to experience a housing problem. Specifically, of all elderly renter households, around 60 percent reported experiencing a housing problem. Among elderly owner households,

approximately 26 percent reported experiencing a housing problem.

Resources

The special needs of seniors can be met through a range of services, including congregate care, rent subsidies, shared housing, and housing rehabilitation assistance. For the frail or disabled elderly, housing can be modified with features that help ensure continued independent living arrangements. Affordable housing developments in the City include:

-
- Westmorland 7 a.m. Apartments
- IV Housing Authority
 - Public Housing, Westmorland, CA 92281

And no Adult Residential Facilities in the City, residents must seek facilities in other cities in the County.

B. Persons with Disabilities (Including Developmental Disabilities)

Three types of disabled persons are considered as having special housing needs: physically impaired, mentally disabled, and developmentally disabled. Each type is unique and requires specific attention in terms of access to housing, employment, social services, medical services, and accessibility of housing.

According to 2015-2019 ACS data, approximately 16.2 percent of Westmorland residents had a disability. The ACS also tallied the number of disabilities by type for residents with one or more disabilities (see Table 19). Among the disabilities tallied, ambulatory (55.0 percent) and cognitive (34.1 percent) difficulties were the most prevalent. However, the types of disabilities experienced varied depending on the age of the disabled person. Specifically, vision difficulties were the most common disability affecting disabled person ages 5-7, afflicting 17.3 percent of the disabled persons in this age group. Meanwhile, ambulatory difficulties were the most likely to affect disabled persons over the age of 65.

Persons with disabilities require housing that is adapted to their needs. Most older single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops.

Persons with Developmental Disabilities

A recent change in State law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. Section 4512 of the Welfare and Institutions Code defines “a developmental disability as a disability that originates before an individual attains 18 years of age; continues, or can be expected to continue, indefinitely; and constitutes a substantial disability for that individual. This term shall include: intellectual disability, cerebral palsy, epilepsy, autism [and] shall also include disabling conditions found to be closely related to intellectual disability or to require

treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature.” This term shall also reflect the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This generally equates to 654 persons in the City of Westmorland with developmental disabilities, based on the 2015-2019 Census population. However, according to the State’s Department of Developmental Services, as of March 2021, approximately 886 Westmorland residents with developmental disabilities were being assisted at the San Diego Regional Center for the Developmentally Disabled branch office located in the City of Imperial. Most of these individuals were residing in a private home with their parents or guardian and 13 of these persons with developmental disabilities were under the age of 18.

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

Resources

Various non-profit groups provide supportive services to the special needs population in El Centro, including persons with disabilities. Community Catalysts California has a center located at 354 E. Main Street in El Centro, CA and offers various social services to City residents with the goal of empowering people with disabilities. Among other organizations, ARC of Imperial Valley offers dial-a-ride paratransit services to City residents and links them to additional health, employment, and residential services. The Arc Imperial Valley also operates Group Homes, Independent Living Services, an Adult Development Center, a Behavior Management Program, an Activity Center, a Work Activity Program, Supported Employment and Individual Placement, a Commercial Kitchen and a Recycling Program with a Car Wash. The Arc Imperial Valley is also one of the largest Federal Government contractors in the area through the AbilityOne Program.

According to the State Department of Social Services, six licensed residential care facilities, with a total capacity of 81 beds, are located within Imperial County. These facilities have the capability to accommodate and serve persons with disabilities. The Zoning Ordinance treats residential care facilities in accordance with the Lanterman Developmental Disabilities Services Act.

State and federal legislation mandate that a percentage of units in new or substantially rehabilitated

multi-family apartment complexes be made accessible to individuals with limited physical mobility.

C. Large Households

For the purposes of this section, large households are defined as households consisting of five or more persons. Generally, the needs of large families are not targeted in the housing market, especially in the multi-family market.

In 2010, 23 percent (or 2,637 households) of the City's households were large households (see Table 11). By 2019, the number of large households in the City had decreased. Two and three bedroom units are the most common housing unit type in the housing market; however, large households typically require dwelling units with four or more bedrooms in order to avoid overcrowding. According to 2015-2019 ACS data, the majority of owner-occupied housing in the City had three or fewer bedrooms (76.8 percent, occupied by 8,930 households). The proportion of renter-occupied housing with four or more bedrooms was low, at just 6.2 percent, accommodating 356 households. Housing options for large renter-households in the City are not sufficient to meet the needs of the 804 large renter-households in the ACS (2015-2019). Lower-income large renter-households would have difficulty finding adequately sized and affordable housing in Westmorland.

Large households are often more susceptible to housing problems, like overcrowding and cost burden.

Resources

In order to address the problem of overcrowding in large family households, the City has included, as part of this housing element, programs to increase opportunities for the development of suitably sized housing for these households. Large households can benefit from a variety of programs and services offered by different organizations in the County. Providers such as the Center for Family Solutions and House of Hope can aid households in need of emergency shelter and other services. Additional organizations that offer support services such as assistance with utilities, food, and housing referrals include the Imperial County Family Resource Center, Catholic Charities, Imperial Valley Food Bank, Imperial Valley Housing Authority, and the Salvation Army.

D. Single-Parent/Female-Headed Households

Single-person-heads of households, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible daycare, health care, and other supportive services. Female-headed families with children are a particularly vulnerable group because they must balance the needs of their children with work responsibilities, often while earning limited incomes. The 2019 SCAG Profiles found that in 2018, 61.7 percent of all city households had 3 people or fewer. About 19 percent of the households were single-person households and 24 percent of all households in the city had 5 people or more.

Resources

Various organizations located within Imperial County offer family and youth services. The Imperial Valley Food Bank also supports the City's families through its food distribution and emergency assistance programs. Womanhaven, Inc. offers shelter and a range of services to victims of domestic violence and their children, including counseling, education, advocacy, legal services, support groups, clothing, and case management.

E. Residents Living Below the Poverty Level

In the City of Westmorland, in 2015-2019, an estimated 31.9 percent of all families were living below the poverty level. Poverty thresholds vary depending on the size of the family and the age of family members; therefore, no specific income threshold can be specified. Approximately 50.9 percent (964 families) of the 1,895 family households living below the poverty level were female-headed. Of the female-headed households living below the poverty level, 51.1 percent (492) of households had children under 18 years of age (see Table 21).

Resources

Households within the City living below the poverty level can benefit from programs and services offering assistance with utility bills, food supplies, and various other social services. Organizations in the City offering these services include the Imperial County Family Resource Center, Catholic Charities, Imperial County Social Services, Imperial Valley Food Bank, and the Salvation Army. In addition to providing essential support services, the Center for Family Solutions and House of Hope provide emergency shelter to residents. The IVHA promotes the maintenance and expansion of the Housing Choice Voucher program, which provides an important source of rental assistance for individuals and households living in poverty. Individuals living in poverty can also benefit from small units such as studios and single-room occupancy units (SROs).

F. Farm Workers

The farm worker population consists of two segments: permanent and migratory (seasonal) farm workers. The permanent population consists of farm workers who have settled in the region and maintain local residence and who are employed most of the year. The migratory farm worker population consists of those farm workers who typically migrate to the region during seasonal periods in search of farm labor employment and from the region during the off-season. Traditional sources of population estimates, including the Census, have tended to significantly underestimate farm worker population. This conclusion is based upon subsequent farm worker data that conflicts with prior data. Moreover, different employment estimation techniques result in diverse estimates of local agricultural employment. The USDA's 2017 Census of Agriculture reported that in Imperial County, 7,934 persons were hired farmworkers (fulltime), with 4,634 working more than 150 days and 3,300 working less than 150 days. Imperial County's migrant farmworker population was 1,057. Westmorland's agricultural population per SCAG Profile 2019 is 28.4%.

Farmers are at very high risk for fatal and nonfatal injuries. Additionally, farming is one of the few industries in which family members (who often share the work and live on the premises) are also at risk for fatal and nonfatal injuries. While no data specific for Westmorland was available at the time of writing, a study published in the Journal of Agricultural Health and Safety found that the disability rate in the farm population was 12.9 percent based on U.S. Census Bureau's American Community Survey (ACS) from 2008 to 2016.⁴ On average, nearly one out of ten farmworkers had a disability and one in 25 farm family children (ages 6 to 17) and slightly more than two in 25 farm family adults had a disability. The high risk of injury and disability has implications in the planning of housing for farmworkers and their families- both in terms of affordability and housing type needs.

Resources

Farmworker's can benefit from programs for lower income households. The IVHA also has a number of apartment complexes suitable for those in need of affordable housing.

G. Homeless Persons

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

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

The City of Westmorland works with other county departments, mental health providers, homeless and transitional shelters, local jurisdictions and other service providers to identify the needs of the homeless, which have been identified in the Imperial Valley Continuum of Care (CoC) 2020 Homeless Point-in-Time Survey conducted on January 24-25, 2020. This updated count presents the most current data for the region. The Point-in-Time Survey reported that on a given day, there are 1,527 homeless in the County of Imperial. This includes 1,334 unsheltered and 193 sheltered homeless people. The exact population of those who are homeless within the City is difficult to estimate because of the transient nature of the homeless population.

Slab City is a World War II era U.S. Marine Corp training center formerly known as Camp Dunlap. In 1956, Camp Dunlap was determined to be no longer required by the Department of Defense. In

October of 1961 and was given to the State of California by quitclaim deed. All of the former Camp Dunlap buildings were removed and all that remained were the concrete slabs used for the building foundations. Many began camping at the slabs and they continued to come and camp and many never left, even though there is no running water, sewage, electricity, or garbage collection. In 2017, Imperial Valley began to include Slab City's homeless population in its PIT counts. According to 2018's PIT report (the last report to include data by community/jurisdictions), Slab City had the largest share of the County's total homeless population. Homeless persons in Slab City include families with children, adults, transition-age youth, veterans, seniors, and all other subsets and demographics. Virtually all homeless persons in Slab City occupy vehicles, hand-built structures, or other makeshift accommodations. The report states that "homelessness in Slab City is unlike the type of homelessness most prevalent nationwide in urban and rural communities insofar as residents of the area are a more-or-less settled population, living in some cases for years on claimed lots with semi-permanent installations... a subset of Slab City residents denies being homeless, preferring instead to be defined as 'living off the grid' or some other alternative term." In 2018, Slab City had the most homeless residents receiving Social Security, Veteran's Assistance, Food Stamps, and disability income in the County. Slab City is located about 40 miles north of Westmorland so its homeless population is not likely to have any effect on the needs and services provided in Westmorland.

The 2018 PIT detailed that Westmorland's homeless population included a majority of unsheltered individuals with no makeshift accommodation of any type, unlike most other communities in the PIT count. Westmorland's homeless population cited Temporary Assistance for Needy Families (TANF), Food Stamps, and cash aid as their primary sources of supplementary income.

Though PIT Survey Reports after 2018 have not reported data by community, the data provided by the 2020 PIT count is still useful in identifying Countywide trends in the homeless population. The 2020 Point-in-Time Survey reported the following about the homeless in Imperial County:

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

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

Resources

There are a number of organizations located within Imperial County that offer emergency shelter, transitional housing and supportive services to the region’s homeless or those at risk of becoming homeless.

Homeless Resources in Imperial County that may assist Westmorland

Organization	Services
Catholic Charities/House of Hope	Emergency Shelter, Supportive Services
Employment Development Department	Supportive Services
House of Hope	Emergency Shelter, Supportive Services
Imperial County Health Department	Supportive Services
Imperial County Social Services	Supportive Services
Imperial Valley Behavioral Health Services	Supportive Services
Imperial Valley Food Bank	Supportive Services
Imperial Valley College	Supportive Services
I.V. Independent Living Center (Empowering People with Disabilities)	Supportive Services
Salvation Army	Supportive Services
IVROP	Supportive Services
IVROP Foster Youth Services	Supportive Services
Womanhaven (d.b.a. Center for Family Solutions)	Emergency Shelter, Supportive Services, Transitional Housing

Source: Imperial County Homeless Resources, Imperial Valley Continuum of Care Council, 2021

I. Extremely Low Income Households

The category “extremely low-income households” is a subset of “very low-income households,” and is defined as 30 percent (or less) of the area median income. The housing element must quantify existing and projected extremely low-income households, analyze their housing needs, and assess the kind of housing available and suitable for extremely low-income households. About 84 percent of all ELI households experience housing problems compared to 83 percent of very low-income households, 54 percent of low-income households, and 45 percent of all households. ELI households also experience

housing cost burdens at higher rates (79 percent) than all other households (74 percent VLI, 45 percent low income, and 38 percent of all households). ELI households also have high rates of overcrowding, compared to all households, but lower than VLI households (Table 24). ELI income renters are also more likely to live in overcrowded conditions than owners. However, all lower-income renter households experience similarly high overcrowding rates (over 18 percent) compared to only nine percent of moderate and above moderate-income households. Based on this analysis, ELI households are disproportionately affected by cost burdens and crowded conditions. Thus, affordable housing opportunities in units of various sizes are necessary to meet the needs of ELI residents in the City.

Resources

Extremely low-income households can also be any of the aforementioned special needs populations and can thus take advantage of the resources listed in the previous sections. In addition, the City will rely on non-funding-related actions to encourage affordable and special needs housing production, including housing for extremely low-income households.

2.6. Housing Stock Characteristics

The Census defines a housing unit as any of the following: a house, an apartment, mobile home or trailer, a group of homes, or a single room intended for use as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building, and which have direct access from outside the building or through a common hall.

This section discusses various housing characteristics and trends that affect housing needs in El Centro. Important characteristics include housing growth, type, vacancy, and age and condition.

A. Housing Unit Growth

Perhaps due to the housing crisis of the late 2000s, the number of housing units in the County increased from 2000 to 2010 (by 27.5 percent) and then only increase by 4.9 percent in the decade that followed. This trend is the opposite in Westmorland, where there was a decrease in the percent growth in the number of housing units between 2000 and 2010.

B. Housing Type

Housing diversity is important for ensuring adequate housing opportunities for Westmorland residents. A diverse housing stock helps ensure that all households, regardless of their income, age group, and/or household size, have the opportunity to find housing that is best suited to their needs.

According to the 2019 SCAG Local Profile:

Housing Type by Units: 2018 Housing Type Number of Units Percent of Total Units
Single Family Detached 464 68.5 %
Single Family Attached 10 1.5 %
Multi-family: 2 to 4 units 100 14.8 %
Multi-family: 5 units plus 83 12.2 %
Mobile Home 20 3.0 %
Total 677 100.0 %
Source: California

Department of Finance, E-5, 2018 The most common housing type is Single Family Detached. Approximately 70 percent are single family homes and 27 percent are multi-family homes. Age of Housing Stock: 2018 Source: U.S. Census American Community Survey, 2017; Nielsen Co. 38.5 percent of the housing stock was built before 1970. 61.5 percent of the housing stock was built after 1970. 5.0% 4.5% 17.8% 11.3% 9.8% 24.2% 14.9% 12.5% 0.0

C. Housing Vacancy

Vacancy rates are important indicators of the supply and cost of housing because they establish the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, then the vacancy rate is low and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the City has an adequate housing supply to provide choice and mobility. General industry standards indicate that vacancy rates of five to six percent for rental housing and one to two percent of ownership housing is sufficient to provide choice and mobility.

In 2015 - 2019, the ACS estimated a vacancy rate of 15.9 percent for the City of Westmorland. In 2006 - 2010, the ACS estimated the vacancy rate for Westmorland to be 8.5 percent.

In both 2010 and 2019, the percentage of vacant rental units greatly exceeded the percentage of units for sale. Of the vacant units in the City in 2019, 6.2 percent were available for sale while 18 percent were available for rent. In 2010, there was a much higher percentage of both vacant housing for sale (21 percent) and vacant housing for rent (28.5 percent). A much large proportion of vacant units are being used for seasonal, recreational or occasional use in 2019 than in 2010. ng housing rehabilitation needs.

2.7. Housing Cost and Affordability

Renters and Homeowners Percentage of Renters and Homeowners: 2000, 2010, and 2018 2000 2010 2018 Sources: 2000 & 2010 U.S. Decennial Census; American Community Survey, 2017; Nielsen Co. Between 2000 and 2018, homeownership rates decreased and the share of renters increased.

A. Ownership Housing

Between 2000 and 2018, the median home sales price of existing homes increased 197 percent from \$48,750 to \$145,000. Median home sales price increased by 107 percent between 2010 and 2018. In 2018, the median home sales price in the city was \$145,000, \$73,000 lower than that in the county overall. Note: Median home sales price reflects resale of existing homes, which varies due to type of units sold. Annual median home sales prices are not adjusted for inflation. Housing costs accounted for an average of 18.9 percent of total household income for homeowners.

During this same time period, changes to median home prices in small neighboring jurisdictions were also significant. Calipatria had a large (206.7 percent) increase in median price. The largest increase occurred in the City of Holtville (249.7 percent) while the smallest increase was in Brawley (82.1

percent). The County's median home price decreased by 0.8 percent between 2011 and 2012. After 2012, when home prices in the region were generally stagnant, the housing market in the cities of Imperial County experienced growth of around 16 percent a year.

B. Rental Housing

Housing costs accounted for an average of 49.9 percent of total household income for renters. Between 2000 and 2018, homeownership rates decreased and the share of renters increased.

2018 STATISTICAL SUMMARY

Westmorland County	Imperial County	Westmorland Relative SCAG	Imperial
--------------------	-----------------	---------------------------	----------

2018 Number of Housing Units	677,577	737 [1.2%]	6,629,879	2018	
Homeownership Rate	43.9%	52.4%	-8.5%	52.4%	
2018 Median Existing Home Sales Price	\$145,000	\$218,000	-\$73,000	\$561,000	2017 - 2018
Median Home Sales Price Change	15.1%	1.4%	13.7%	6.5%	2

C. Housing Affordability by Income

Housing affordability can be inferred by comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment.

Housing affordability is an important indicator of the quality of life in Westmorland. If residents pay too much for housing they will not have sufficient income for other necessities such as health care. Households that spend a substantial portion of their income on housing may also be at risk of becoming homeless in unexpected circumstances such as illness or loss of employment. State law requires that the City facilitate the provision of housing opportunities that are affordable to all economic segments of the community.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, the California Department of Housing and Community Development (HCD) developed income limits that can be used to determine the maximum price that could be affordable to households in the upper range of their respective income category. Households in the lower end of each category can afford less by comparison than those at the upper end.

Based on these income limits for Imperial County and current real estate prices, homeownership in Westmorland is within reach of low to moderate-income households, with the exception of single-person low-income households. Housing options for extremely low and very low-income households are virtually non-existent unless public assistance is involved.

The moderate and median income households can generally afford the market rents for apartments in Westmorland. Low-income households in Westmorland may be able to rent housing in the City depending on household size; however, competition for appropriately sized rental homes may lead to a housing cost burden or overcrowding.

The price of homes has increased approximately 16 percent a year since 2012, which saw the tapering of the housing crisis at the end of the prior decade. In addition to high costs, tight credit markets and high down-payment requirements may also have forced otherwise income-qualified households out of the ownership market. This, in turn, could have created a higher demand for rental properties with associated rental price increases. Furthermore, a general shortage of ownership housing options may explain higher relative housing costs when compared to rental housing.

Between 2000 and 2018, the median home sales price of existing homes increased 197 percent from \$48,750 to \$145,000. Median home sales price increased by 107 percent between 2010 and 2018. In 2018, the median home sales price in the city was \$145,000, \$73,000 lower than that in the county overall. Note: Median home sales price reflects resale of existing homes, which varies due to type of units sold. Annual median home sales prices are not adjusted for inflation.

2.8. Affordable Housing

State law requires the City to identify, analyze, and propose programs to preserve existing multi family rental units that are currently restricted to lower income housing use and that will become unrestricted and possibly be lost as lower income housing (i.e., “units at risk” or “at-risk units”).

The following discussion satisfies the first three requirements of State law listed above pertaining to the potential conversion of assisted housing units into market rate housing for the ten-year period between October 15, 2021 and October 15, 2031. The Housing Plan section includes a program for preserving the at-risk units, which meets the final requirement of State law.

A. Inventory of At-Risk Rental Housing Units

The inventory, within Westmorland, includes 194 assisted units in deed-restricted affordable housing developments.

3.Housing Constraints

Although Westmorland strives to ensure the provision of adequate and affordable housing to meet the needs of the community, many factors can constrain the development, maintenance and improvement of housing. These include market mechanisms, government regulations, and physical as well as environmental constraints. This section addresses these potential constraints that affect the supply and

cost of housing in Westmorland.

3.1. Market Constraints

Several local and regional constraints hinder the ability to accommodate Westmorland's demand for affordable housing. The cost of land and development costs can make it expensive for developers to build housing. Historically, these constraints have resulted in housing that is often unaffordable to lower, and often moderate, income households, or may render some potential residential projects economically infeasible for developers. Subsidies are often necessary to bridge the gap between market rate and affordable housing costs by lower income households. In fact, most affordable housing developments in Westmorland today often require multiple subsidy sources in order to make a project financially feasible.

B. Construction Costs

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. As a result, builders are under constant pressure to complete a job for as low a price as possible while still providing a quality product. This pressure has led (and is still leading) to an emphasis on labor-saving materials and construction techniques.

For the average home, the cost of labor is generally two to three times the cost of materials and therefore represents a substantial component of the total cost of construction. Most relatively small residential construction jobs in Imperial County are performed with nonunion contractors; as a result, labor costs are responsive to changes in the residential market. The relative ease by which a skilled tradesperson can get a contractor' in Westmorland further moderates the pressures that force labor costs to rise. Construction costs in Westmorland are about the same as in other parts of Imperial County. According to City estimates in 2020, costs may range between \$75 and \$85 per square foot for single-family residences depending on the level of amenities provided, and \$230 to \$300 (prevailing wage) per square foot for multi-family residential structures, depending on construction type and excluding parking. These estimates are based on a 1,300-square-foot single-family home and a 56-unit project with a cost per unit of \$233,389.

A reduction in amenities and quality of building materials (above minimum acceptability for health, safety, and adequate performance) could result in lower sale prices. Economy-building techniques may reduce costs. In addition, prefabricated, factory-built housing may provide for lower-priced housing by reducing construction and labor costs. Another factor related to construction costs is the number of units built at one time. As the number of units is increased, construction costs over the entire development are generally reduced based on economies of scale. This reduction in costs is of particular benefit when density bonuses are used for the provision of affordable housing.

C. Home Financing

The availability of financing can affect a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements, and refinancing, whether financed at the market rate or with federal government assistance. Locally assisted mortgages (such as first-time homebuyer programs) are not subject to HMDA reporting.

Home Purchase Loans

In 2019, a total of 3 households applied for government-backed loans (e.g. FHA, VA) in Westmorland.

3.2. Governmental Constraints

Housing affordability is affected by factors in both the private and public sectors. Actions by the City can have an impact on the price and availability of housing in Westmorland. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and nonprofit sectors, making it difficult to meet the demand for affordable housing and limiting the supply in a region.

A. Land Use Controls

Zoning for a Variety of Housing Types Government Code Section 65583 and 65583.2 require Westmorland's land use policies, as expressed in the Land Use Element and Zoning Ordinance, to provide for a variety of housing types including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. The housing element must also identify a zone, or zones, where emergency shelters are a permitted use without discretionary review (Government Code Section 65583(a)(4)) and demonstrate that transitional housing and supportive housing are considered a residential use and subject to only those restrictions that apply to other residential dwellings of the same type in the same zone (Government Code Section 65583(a)(5)). Table A-27 describes Westmorland's zoning for a variety of housing types. The Zoning Ordinance will be amended in April 2016 to comply with State law regarding a city's responsibility to provide for a variety of housing types. Table A-28 lists the housing types permitted in the residential zones and one commercial zone.

Density Bonus Ordinance

Pursuant to Government Code Section 65915(a), the City Council has adopted an ordinance that specifies how compliance with the State density bonus law (Government Code Sections 65915-65918) will be implemented. Government Code Section 65915(d)(3) required the City to

establish procedures for carrying out the purposes of the State density bonus law.

Parking Requirements

Each residential zone requires 1.5 parking spaces on site per dwelling unit. A full parking space shall be provided in each instance where a fractional space would otherwise be required. In the R-1 Zone, a carport, subject to Planning Commission review and approval, may encroach within the front yard setback, provided that it is an open-frame structure and does not obstruct visual lines of sight from the roadway(s). The City's Density Bonus Ordinance allows an applicant to request a parking ratio of one on-site parking space for zero (0) to one (1) bedroom dwelling units. Westmorland's parking standards are less than those of nearby cities. For example, the cities of Brawley and El Centro require two parking spaces for a 2-bedroom apartment unit. The parking standards do not unduly constrain the development of new housing.

C. Provisions for a Variety of Housing Types

Development Fees and Exactions

Several planning actions require the payment of fees by the applicant. Table A-30 lists the various planning actions and associated fees.

City of Westmorland Planning Fees

Planning Action	Fee
Site Plan Review - Single Site Plan - Multifamily	\$100 \$150 + \$10/u
CUP	\$175
Variance	\$175
Zone Change	\$175 + consultant
GPA	\$250 + consultant
Specific Plan/PUD	\$1,000 + Cost
Environmental Assessment	\$150
Categorical Exemption	\$75 + County fee
Negative Declaration	\$150 + County fee
EIR	\$1,000 + consultant
Tentative Tract Map	\$400 + \$5/lot

Tentative Parcel Map	\$300
Tentative Parcel Map	\$200
Annexation	\$500 per acre + LAFCO costs

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

Development Impact Mitigation Fees (Per Unit)

<u>Impact Fee Category</u>	<u>Per Unit Fees</u>	
	<u>Multi-Family</u>	<u>Single-Family</u>
Admin. Facilities Impact Fees	\$135	\$135
Police	\$73	\$73
Fire	\$102	\$102
Park and Recreation	\$292	\$264
Traffic	\$63	\$44
Water	\$1,259	\$692
Sewer	\$2,260	\$1,989
Standard Per Unit Impact Fees	\$4,184	\$3,299
Westmorland Elementary Dist.	\$1.82 per sq ft	\$1.82 per sq ft
Brawley Union High School	\$0.99 per sq ft	\$0.99 per sq ft
Operational Development Fee (Imperial County APCD)	\$378 per unit	\$496 per unit

Source: Westmorland Planning, Building, Safety and Engineering Departments and Imperial County, APCD

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 OD fee is assessed

to provide the Imperial County Air Pollution Control District with a sound method for mitigating emissions produced from new development. Due to the unfortunate economic crisis affecting Imperial County, the fee has been waived in some previous years and for 2015 it has been reduced by 50% and is currently \$189 per multifamily unit and \$248 per single family unit. Elementary school students who live in Westmorland attend the Westmorland Union Elementary School. High school students attend Brawley Union High School located seven miles south of Westmorland. Both school districts assess a school impact fee on all new multi-family and single-family residential development. The total fee is \$2.81 per square foot. 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 for affordable and senior housing developments. Fees charged for a typical single-family dwelling unit (approximately 1,300 square feet) that is part of a subdivision, amount to \$3,299 plus the school district fee of \$3,653, and the County OD Fee of \$248 for a total of \$7,200. For a home valued at \$200,000, the City fees (\$3,299) are 1.65% of the value or cost. For a home valued at \$300,000, the City fees (\$3,299) represent 1.1% of the value or cost. The City fees are significantly lower than other cities in Imperial Valley and represent a small percentage of the housing development costs. For a typical four unit multifamily project with 1,300 square foot units, the total fees charged, including school fees, amount to about \$32,104. The per unit fees are \$8,026, which represents 4.1% of the estimated development cost of \$193,825. A local Imperial County developer provided the estimated development cost. 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. Some of 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. In summary, the City fees as a percentage of single-family and multi-family development costs is not unduly high and do not pose a constraint to the development of housing.

E. Development Permit Procedures

The City of Westmorland City Hall has three full time employees, the City Clerk, a Water Billing Agent, and a Public Works Supervisor. All other administrative employees are contract or hired on an as-needed basis such. City personnel are committed to making the development process as uncomplicated and smooth as possible. They will arrange staff review meetings so that a developer can experience a virtual one-stop process.

Both zoning and building permit applications for single-family developments can usually be processed in less than two months. This is comparable to permit processing times in other cities throughout Imperial County and therefore does not severely constrain housing affordability. The City of Westmorland encourages development by streamlining development processes whenever possible.

Typically, proposed projects are submitted to the City, for an initial administrative review by Planning, Building, and Public Works staff. The project applicant is 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 multifamily 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.

Westmorland 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 only require a staff level review.

Table on the next page outlines the development review and approval procedures for residential developments, as well as typical processing times for each type of entitlement. Both single family 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.

Site plan review is a staff level review process that typically takes between 2 weeks and 30 days

to complete. Site plans are submitted to the City Contract Planner and City Engineer for purposes of demonstrating that a proposed development conforms to the development standards regarding density, height, setbacks, floor area ratios, and the like. The Planner is authorized to approve or deny the site plan. Project applicants may appeal the Director's decision to the Planning Commission.

To reiterate, the sites included in the Sites Inventory and Analysis (part C of Appendix A) located within the City limits are either approved (e.g., Gateway Plaza) 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.

	Single Family Unit	Single Family Subdivision	Multi-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	No Site Plan Review	No 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

Lot Line Adjustments

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

determination that the adjustment plat meets the requirements of the Subdivision Ordinance and complies with the General Plan and Zoning Ordinance.

G. Transparency in Development Process CHG to:

Local Processing and Permit Procedures

The City of Westmorland City Hall has three full time employees, the City Clerk, a Water Billing Agent, and a Public Works Supervisor. All other administrative employees are contract or hired on an as-needed basis such. City personnel are committed to making the development process as uncomplicated and smooth as possible. They will arrange staff review meetings so that a developer can experience a virtual one-stop process

Both zoning and building permit applications for single-family developments can usually be processed in less than two months. This is comparable to permit processing times in other cities throughout Imperial County and therefore does not severely constrain housing affordability. The City of Westmorland encourages development by streamlining development processes whenever possible.

Typically, proposed projects are submitted to the City, for an initial administrative review by Planning, Building, and Public Works staff. The project applicant is 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 multifamily 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.

Westmorland 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 only require a staff level review.

Both single family 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.

Site plan review is a staff level review process that typically takes between 2 weeks and 30 days to

complete. Site plans are submitted to the City Contract Planner and City Engineer for purposes of demonstrating that a proposed development conforms to the development standards regarding density, height, setbacks, floor area ratios, and the like. The Planner is authorized to approve or deny the site plan. Project applicants may appeal the Director's decision to the Planning Commission.

To reiterate, the sites included in the Sites Inventory and Analysis (part C of Appendix A) located within the City limits are either approved (e.g., Gateway Plaza) 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.

H. Housing for People with Disabilities

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.

The City has implemented the following actions:

- Updated the Reasonable Accommodation Procedure. The Procedure was updated based on the recommendations of the State Attorney General, U. S. Departments of Housing and Urban Development and Justice, and Mental Health Advocacy Services, Inc.
- The Zoning Ordinance was amended to include group home regulations that comply with the Welfare and Institutions Code (Lanterman-Petris Act) and Health and Safety Code (Community Care Facilities Act and Residential Care Facilities for the Elderly Act). These amendments included up-to-date definitions as well as regulations for group homes housing 6 or fewer persons and group homes housing 7+ persons.

Group homes housing 6 or fewer persons are allowed by right in all residential zones. Group homes housing 7+ persons are permitted subject to approval of a Conditional Use Permit (CUP). The CUP process is not unique to group homes and is intended to make conditionally permitted uses compatible and harmonious with adjacent uses. The Westmorland Zoning Ordinance requires a public hearing before the Planning Commission. The Westmorland Planning Commission may approve, conditionally approve or deny a CUP application. An applicant may appeal the decision of the Planning Commission to the City Council.

- The Zoning Ordinance was amended to include definitions for family and disability. The family definition was based on recommendations of the Mental Health Advocacy Services, Inc. The disability definition was based on input from the Los Angeles Office of the U.S. Department of Housing and Urban Development and based on the definition included in the

State Fair Employment and Housing Act.

The family definition is as follows:

Family means one or more persons living together as a single housekeeping unit in a dwelling unit. A family includes the residents of residential care facilities and group homes for people with disabilities. A family does not include larger institutional group living situations such as dormitories, fraternities, sororities, monasteries or nunneries

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. Part C describes the constraints hindering the designation of sites to accommodate the lower income housing need. There are no other 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 families. The City will seek funding to ameliorate this constraint.

HOUSING RESOURCES

1. FINANCIAL RESOURCES Westmorland is eligible to participate in the State of California, Housing and Community Development (HCD) Small Cities loan and grant programs:

Community Development Block Grant Programs: These funds are awarded on a competitive basis and are generally used for housing rehabilitation, rental and homeowner assistance programs, emergency health and safety issues, and for planning and technical assistance grants for plans and studies for housing and facilities.

Westmorland has not been successful in obtaining housing rehabilitation grant funding since 2005. They did obtain a Planning/Technical Assistance Grant in 2014. The City will continue to apply for housing rehabilitation funds in future years.

As the loans previously made to residents are paid back funds are placed in a self-sustaining Revolving Loan Fund the City can utilize to fund housing programs.

Home Investment Partnership Program (HOME): Housing rehabilitation, new construction, and acquisition and rehabilitation, for both single-family and multifamily projects, and predevelopment loans by CHDOs. All activities must benefit lower-income renters or owners.

The last successful HOME housing rehabilitation program in Westmorland was in 2002/03. The HOME ownership First Time Home Buyer Program was not practical since there were so few eligible

homes for sale or planned for development. The City will continue to apply for HOME funds for housing rehabilitation.

USDA - Rural Development: the National Office of USDA issues a Notice of Funding Availability (NOFA) toward the end of each year for all types of developers and partnerships to apply for construction and rental assistance funding. Funding is so competitive that funds are limited to \$1-million per successful applicant requiring considerable additional funds.

The Redondo I and II complexes (68 units total) were developed using USDA Section 515 funding and State Tax Credits and City participation about 10 years ago.

CalHEA Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for low and moderate income families and individuals. Loans are made to developers with sufficient credit and additional funding to make the project viable for a 55-year affordability period requirement. Availability of funds to loan is dependent on bond sales and varies from year to year. CalFHA also manages the Veterans Housing and Homeless Prevention (VHHP) Program and the first NOFA was issued in 2014. That program requires on-site services usually provided in cooperation with an established provider.

The Strategic Growth Council Affordable Housing and Sustainable Communities Program has been funded by the State Budget Act of 2014 which appropriated \$130- Million from the Greenhouse Gas Reduction Fund (GGRF). The preliminary guidelines were drafted in September 2014 and the final guidelines are pending publication in mid-January 2015. A preliminary review indicates that the City of Westmorland would be an eligible area for the development of multifamily housing using these funds on the basis of being a disadvantaged rural area. [http://www.sgc.ca.gov/docs/December Guidelines Memo.pdf](http://www.sgc.ca.gov/docs/December%20Guidelines%20Memo.pdf)

4.1 FINANCIAL RESOURCES

Westmorland is eligible to participate in the State of California, Housing and Community Development (HCD) Small Cities loan and grant programs:

- **Community Development Block Grant Programs:** These funds are awarded on a competitive basis and are generally used for housing rehabilitation, rental and homeowner assistance programs, emergency health and safety issues, and for planning and technical assistance grants for plans and studies for housing and facilities.

Westmorland has not been successful in obtaining housing rehabilitation grant funding since 2005. They did obtain a Planning/Technical Assistance Grant in 2014. The City will continue to apply for housing rehabilitation funds in future years.

As the loans previous made to residents are paid back funds are placed in a self-sustaining Revolving Loan Fund the City can utilize fund housing programs.

- **Home Investment Partnership Program (HOME):** Housing rehabilitation, new construction, and acquisition and rehabilitation, for both single-family and multifamily projects, and predevelopment loans by CHDOs. All activities must benefit lower-income renters or owners.

The last successful HOME housing rehabilitation program in Westmorland was in 2002/03. The HOME ownership First Time Home Buyer Program was not practical since there were so few eligible homes for sale or planned for development. The City will continue to apply for HOME funds for housing rehabilitation.

USDA - Rural Development: the National Office of USDA issues a Notice of Funding Availability (NOFA) toward the end of each year for all types of developers and partnerships to apply for construction and rental assistance funding. Funding is so competitive that funds are limited to \$1-million per successful applicant requiring considerable additional funds.

The Redondo I and II complexes (68 units total) were developed using USDA Section 515 funding along with State Tax Credits and City participation about 10 years ago.

- **CalHFA Multifamily Programs** provide permanent financing for the acquisition, rehabilitation, and preservation or new construction of rental housing that includes affordable rents for low and moderate income families and individuals. Loans are made to developers with sufficient credit and additional funding to make the project viable for a 55-year affordability period requirement. Availability of funds to loan is dependent on bond sales and varies from year to year. CalFHA also manages the Veterans Housing and Homeless Prevention (VHHP) Program and the first NOFA was issued in 2014. That program requires on-site services usually provided in cooperation with an established provider.
- The Strategic Growth Council Affordable Housing and Sustainable Communities Program has been funded in the State Budget Act of 2014 which appropriated \$130- Million from the Greenhouse Gas Reduction Fund (GGRF). The preliminary guidelines were drafted in September 2014 and final guidelines are pending publication in mid-January 2015.

ADMINISTRATIVE RESOURCES

- **Housing Authority:** Residents of the City of Westmorland served by the Imperial Valley Housing Authority (IVHA) which provides public housing and administers the Section 8 Housing Choice Voucher Program. IVHA owns and manages over 1,000 consistently occupied rental units for lower-income families, seniors, disabled persons, and farmworkers in locations throughout the county of which 65 units are located in Westmorland.

- **The Housing Choice Voucher Program** provides recipients the opportunity to rent housing of their choice- in the private market and is managed by IVHA. The program provides rent subsidies to private landlords on behalf of participant households. IVHA administers a total of 1,626 rental assisted units throughout Imperial County. Between 6,000 and 7,000 applicants are on the Public Housing and Housing Choice Voucher waiting lists.
- **Imperial Valley Regional Task Force** on Homelessness which addresses homelessness issues Countywide through a network of assistance programs and facilities throughout the Imperial. The Task Force Homeless Count in 2013 identified two homeless persons in Westmorland. They would be eligible for any of the programs offered.
- **The Department of Developmental Services (DDS) Regional Center** in San Diego serves the City of Westmorland and all of Imperial County in the diagnosis and eligibility assessment and client services which are paid for by the State.
- **County Public Health Department offers program** assistance to help City residents meet public health objectives and for the City to become a "Healthy Community." At the present time, the City provides space in City Buildings for activities such as morning and evening Zumba classes that are held at the Youth Center Monday through Friday and the summer water aerobics that are offered at the City Pool.
- **The California Coalition for Rural Housing** supports the production and preservation of decent, safe, and low-cost housing for rural and low-income Californians. The Coalition advocates for housing at all levels of government before legislative and regulatory bodies. It also provides technical and organizational assistance to community groups and nonprofit agencies and educates the public on housing issues. The Coalition administers the Rural California Internship Program for culturally and linguistically diverse university students who represent rural California's minority, immigrant, and/or farm worker communities.
- **Affordable Housing Developers:** The City of Westmorland has participated in the annual conference of the California Coalition for Affordable Housing (formerly the Rural Housing Council) and has distributed information to the membership about the City, available land, and any funding availability.
- **Supportive Services:** The City of Westmorland is served by various non-profit groups such as the Westmorland Chamber of Commerce that sponsors community activities. Other supportive service agencies are located in Brawley, seven miles south.

4.2 ADEQUATE SERVICES

Water/Wastewater: The City of Westmorland operates its own water and wastewater systems. A recent update to the Service Area Plan indicates there is sufficient capacity for both services to accommodate

growth through the year 2025.

Planning/Building and Safety: City personnel are dedicated to the City and are committed to making the development process as uncomplicated and smooth as possible. They will arrange staff review meetings so that a developer can experience a virtual one-stop process. Both zoning and building permit applications for single-family developments can typically be processed in less than two months.

5. Progress Report

5.1. 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, OBJECTIVES AND POLICIES The 2008-2014 Housing Element included seven goals and 26 objectives; however, no specific policies were set forth. The prior goals are no longer appropriate to guide Westmorland's efforts during the 2013-2021 planning period. The prior goals have been replaced in Section 2 - Housing Program - of the 2013-2021 Housing Element by goals that specifically and affirmatively further the seven mandated program categories of the Housing Element Law.

3. EFFECTIVENESS OF THE 2008-2014 HOUSING ELEMENT The City's share of regional housing need for the prior projection period was 246 housing units. Between 2008 and January 2015, one housing unit was constructed. The table below shows the quantified objectives of the 2008-2014 Housing Element. None of the objectives were met which indicates they were too ambitious given the size of Westmorland and the Great Recession that occurred during this period.

**City of Westmorland
Quantified Objects - Previous Element (2013 - 2021)**

<u>Program</u>	<u>Number of Units</u>
New mutli-family construction	80 Units
In-fill single family	45 units
First-time homebuyer	20 units
Rental Vouchers/Certificates	50 households
Single Room Occupancy	45 units
Edlerly/Frail Housing	20 units
Housing Rehabilitation	8 units
Total	220 units

Because of budget constraints the on-site permanent staff of the City has been reduced to three persons: a City Clerk, a Water Department clerk, and a Public Works Supervisor. The City engineer is on-call; the city planner is contracted on an as-needed basis; the Mayor working with the city clerk functions as the city administrator.

The 2013-2021 Housing Element was effective in pinpointing the land use and zoning changes that were necessary in order for the City to be in compliance with State law. Eighteen of the 77 "programs" involved updates to the Zoning Ordinance. All of the zoning programs have been implemented and the results are briefly described below as a part of the description of Progress in Implementation and in Section E Governmental Constraints.

PROGRESS IN IMPLEMENTATION The 2013-2021 Housing Element, as previously noted, included 77 individual programs. A brief description of the progress made in program implementation is given below.

a. Zoning Ordinance Amendments Based on the 18 zoning programs included the prior 2008-2014 Housing Element, the City in February 2016 will adopt Zoning Ordinance Amendments that address California law mandates. These include up-to-date zoning provisions for:

- Emergency shelters: to comply with Government Code 65582 (d), Section 65583(a)(4), and Government Code Section 65583(c)(1)
- Transitional Housing: to comply with Government Code Section 65582(f) and Government Code Section 65583(a)(5)
- Supportive Housing: to comply with Government Code Section 65582(9) and Government Code

Section 65583(a)(5)

- Single Room Occupancy (SRO) housing :to comply with Government Code Section 65583(c)((1)
- Employee Housing: to comply with Government Code Section 65583(c)(1) □ Density Bonus Ordinance: to comply with Government Code Section 65915-65918
- Reasonable Accommodation Procedure: to comply with Government Code Section 65583(c)(3)
- Group Homes: to comply with the Welfare and Institutions Code (Lanterman-Petris Act) and Health and Safety Code (Community Care Facilities Act and Residential Care Facilities for the Elderly Act)
- Zoning Ordinance Definitions (e.g., family, disability, etc)

5.2 Housing Funding

Seventeen of the 77 program involved seeking funding for housing. Section 8 funding continued to be available to Westmorland's residents during the 2013-2021 period. However, the Redevelopment Agency was dissolved in February 2012. And funding for a housing program was not secured from CDBG, HOME, USDA and other resources.

c. Fair Housing/Equal Housing Opportunity

Nine of the 77 housing programs involved fair housing and equal opportunity efforts. The City implemented actions to post on its website links to the HUD's Fair Housing and Equal Opportunity Office and the State Department of Fair Employment and Housing (DFEH). The City staff has also contacted the Inland Fair Housing and Mediation Board (IFHMB) to obtain fair housing literature that can be displayed at the City Hall counter.

The following actions will be carried forward and included in Section 2 - Housing Program - of the 2020-2029 Housing Element:

- Posting on the City's website a link to fair housing providers such as the IFHMB and California Rural Legal Assistance.
- Posting on the City's website a link to additional fair housing information
- Invite Inland to provide fair housing information at the City booth at the Annual Honey Bee Festival in the City.

d. Energy Conservation

Seven of the 77 housing programs were energy conservation related. The programs focused on providing public information, coordinating with the Imperial Irrigation District (IID), and pursuing LEED certified housing. The City posted on its website a link to the IID website and its energy conservation programs.

The public information efforts are incorporated into Section 2 - Housing Program - of the 2013- 2021 Housing Element: Additional energy conservation opportunities are described in Section 2.

e. Coordination with Developers and Streamlined Processing

Six programs involved working with developers and streamlining the development review process. Since adoption of the 2008-2014 Housing Element, the City approved the Gateway Plaza Project which includes residential and commercial land uses.

f. Sites Availability

Five of the 77 programs involved making sites available to accommodate the City's share of the regional housing need. The specific sites mentioned in the 2008-2014 Housing Element were not re-designated in the Land Use Element and Zoning Map. The City Council approved rezoning of a site to R-3 to permit the development of 100 housing units.

g. Building Code and Code Enforcement

Four of the 77 programs involved the adoption of the California Building Code and continuing the code enforcement program. These programs were implemented during the 2008-2014 planning period.

h. Other Programs

Eleven programs involved actions to inform the community about housing issues, intergovernmental coordination, and other miscellaneous activities. The following programs are carried forward and included in Section 2 - Housing Program - of the 2013-2021 Housing Element:

- Explore fee reductions and deferrals and other incentives to encourage housing development
- Continue the one-stop, front counter permit processing procedures, including preapplication conferences.
- Develop a lot consolidation program