



# Staff Report

Agenda Item No. D-2

**To:** City of Imperial Planning Commission  
**From:** Lisa Tylanda, Planner  
**Date:** July 3, 2019  
**Subject:** 2019 Comprehensive Update to 2014-2021 Housing Element

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<b>Applicant:</b>	City of Imperial’s Community Development Department
<b>Recommendation:</b>	Recommend Adoption of the Updated 2014-2021 Housing Element to City Council.

## Discussion/Analysis:

The Housing Element is an integral component of the City’s General Plan. The Housing Element addresses existing and future housing needs of all types for persons of all economic groups in the City. The Housing Element is a tool for use by citizens and public officials in understanding and meeting the housing needs in City of Imperial. The Housing Element Update covers the eight-year period of October 2014 through September 2021, and provides an implementation strategy for effectively addressing the housing needs of Imperial residents during this period.

- Planning Commission recommended the draft Housing Element to City Council on 11/28/2018.
- City Council approved the draft Housing Element to be submitted to the Department of Housing and Community Development of the State of California on 12/19/2018.
- Community Development Department Staff submitted the Housing Element Draft update for the 1<sup>st</sup> review on January 11, 2019.
- Community Development Department Staff submitted the Housing Element Draft update for the 2<sup>nd</sup> review on April 15, 2019.
- The City of Imperial, received a “Compliance Letter” from the State of California’s Housing and Community Development Department on June 13<sup>th</sup>, 2019 informing the City that the draft housing element is compliant with State of California Housing Laws and can now be formally adopted by the City of Imperial.

## Environmental Compliance:

An Initial Study has been prepared for the proposed update. The proposed draft Housing Element update of 2018 for the planning period of 10/2014 through 9/2021 has been found to NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

**Staff Recommendation:**

Staff recommends this item to the Planning Commission for review and recommendation to the City Council.

**Attachments:**

- Housing Element update for the Planning Period of 10/2014 through 9/2021.
- “Compliance” comment letter from HCD.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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June 13, 2019

Othon Mora, Director  
Community Development Department  
City of Imperial  
400 South Imperial Avenue, Suite "A"  
Imperial, California 92251

Dear Othon Mora:

**RE: City of Imperial's 5<sup>th</sup> Cycle (2013-2021) Draft Four-Year Housing Element Update**

Thank you for submitting Imperial's revised draft housing element update received for review on April 15, 2019, along with revisions received on June 4 and June 7, 2019. Pursuant to Government Code section 65585, subdivision (b), the Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a telephone conversation on May 22, 2019 with Lisa Tylenda, Planner.

The revised draft element meets the statutory requirements described in HCD's March 12, 2019 review. The revised element will comply with State housing element law (Article 10.6 of the Government Code) when it is adopted and submitted to HCD, in accordance with Gov. Code section 65585, subd. (g).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the city must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate.

For your information, some general plan element updates are triggered by housing element adoption. For example, a jurisdiction must address environmental justice in its general plan by the adoption of an environmental justice element, or by the integration of environmental justice goals, policies, and objectives into other general plan elements upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. (Gov. Code, § 65302, subd. (h).) In addition, the safety and conservation elements of the general plan must include analysis and policies regarding fire and flood hazard management and be revised upon each housing element revision. (Gov. Code, § 65302, subd. (g).) Also, the land-use element must identify and analyze

disadvantaged communities (unincorporated island or fringe communities within spheres of influence areas or isolated long-established legacy communities) on, or before, the housing element's adoption due date. (Gov. Code, § 65302.10, subd. (b).) HCD urges the city of Imperial to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

[http://opr.ca.gov/docs/SB244\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/SB244_Technical_Advisory.pdf) and  
[http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, CalTrans Senate Bill (SB) 1 Sustainable Communities grants; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and the upcoming SB 2 Planning grant as well as ongoing SB 2 funding consider housing element compliance and/or annual reporting requirements pursuant to Gov. Code section 65400. By having a compliant housing element, Imperial will meet housing element requirements for these funding sources.

HCD appreciates the hard work and dedication Lisa Tylenda, Planner, provided in preparation of the housing element and looks forward to receiving Imperial's adopted housing element. If you have any questions or need additional technical assistance, please contact Tom Brinkhuis, of our staff, at (916) 263-6651.

Sincerely,



Zachary Olmstead  
Deputy Director