
2021-2029



City of Westmorland

Housing Element

Adopted October 2024

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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 a RHNA of 33 units, in the following income distribution:

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

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. Draft Housing Element Review

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.

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.

B. Adoption Hearings

For the adoption of the 2021-2029 Housing Element, the City conducted public hearings before the City Council on October 2, 2024.

C. 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.

1.3 Consistency with the General Plan

The Housing Element has been reviewed for consistency with the City's other General Plan Elements, and the Housing Element's policies and programs are consistent with the other Elements. As portions of the General Plan may be amended in the future, the Housing Element will be reviewed to ensure internal consistency is maintained. Table 1 – Housing Element Policy identifies the relationship between the Housing Element goals, policies, and objectives to other elements of the Holtville General Plan. The housing issue section identifies the mandated contents and broader goals of the Housing Element. An "X" indicates that related goals and policies are contained in the corresponding General Plan Element.

Table 1: Consistency with Other General Plan Elements

Housing Issue Area	Land Use	Circulation	Conservation/ Open Space	Safety	Noise
Conserve & Improve Existing Housing Stock			X	X	
Identify Adequate Sites for Development	X	X	X	X	X
Provision of Affordable Housing	X				
Removing Constraints	X	X	X		

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, 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.

Table 2: Population Trends for 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: 2000, 2010 U.S. Census Bureau, 2017-2021 ACS

B. 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.

Table 3 Race and Ethnicity - Westmorland and Imperial County

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)	1,842	82.80%	152,172	84.2%
Total	2,225	100.0%	180,701	100.0%

Source: ACS 2015-2019

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 2020, 42.4 percent of households in the City had annual incomes less than \$24,999. The 2020 State income limit for Imperial County was \$70,700. However, approximately 83.4 percent of households earned less than \$74,999, while only 16.7 percent made over \$75,000. It is notable that the overall number and proportion of households with lower (less than \$24,999) and higher incomes (\$75,000 and greater) has constantly increased, while the proportion of households earning middle incomes (\$25,000 to \$74,999) has decreased (See table 4).

Table 4 Household Income Ranges

Income Ranges	2020 % of Households
Less Than \$10,000	12.7%
\$10,000-\$24,999	29.7%
\$25,000 to \$49,999	19.6%
\$50,000 to \$74,999	21.4%
\$75,000 to \$99,999	5.9%
\$100,000+ \$	10.8%
Total	100.0%

Source: ACS 2015-2019

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. The table below summarizes the distribution of income categories for residents of Westmorland. Only 15% of the households in Westmorland are within the moderate or above-moderate income categories. A majority of households are low to extremely low income, while a significant portion of households are extremely low income (22%).

Table 5 Household by Income Categories (2014-2018)

Income Group	<i>City of Westmorland</i>	<i>Imperial/County</i>
Extremely Low Income (<30%)	22%	13%
Very Low (31 to 50%)	30%	14%
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. Between 2018 and 2019, the average household size in Westmorland slightly increased to 5 from 4.2 while the County has slightly decreased to 3.8 from 3.9 (See Table 6).

Table 6 Average Persons-Per-Household Trends (2018-2019)

Year	City of Westmorland	County
2018	4.2	3.9
2019	5	3.8

Source: ACS 2015-2019, pointzhomes.com; SCAG Local Housing Data (ACS 2014-2018) 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.

In 2018, 40.9 percent of the city's households owned their homes, while 32.3 percent rented. In the same year, 58.4 percent of the County's population owned their homes, while 41.6 percent were renting. Compared to the City, there was a notable difference between owners and renters, with 16.7 percent more owners than renters as shown Table 7. The City of Westmorland continues to have a lower proportion of owner-households than Imperial County, whereas the County has remained almost the same.

Table 7 Tenure (2018-2019)

Household Size	Westmorland % of Total	County % of Total
2018		
Total	628	44,057
Owner	40.9%	58.4%
Renters	59.1%	41.6%
2019		
Total	630	44,829
Owners	38.9%	58.3%
Renters	61.1%	41.7%

Source: U.S. Bureau of the Census, 2015-2019, SCAG Local Housing Data 2014-2018.

2.4. Housing Problems

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. 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

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.

Table 8 summarizes overpayment and cost burden for the residents of Westmorland. In Westmorland, 41.5 % of all households experience some form of cost burden, but those who rent experience a higher percentage of burden, especially those that are in the low and very low-

income categories. There were 30.2% of homeowner households and 50.3% of renter households experience cost burdens. Specifically, 3% of homeowners and 28.3% of renters overpaid severely, indicating a 24.4% difference (Table 8).

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).

Table 8 Summary of Housing Overpayment

Income Spent on Housing	Owner		Renter		Total	
	Number	Percentage	Number	Percentage	Number	Percentage
Not Overpaying (Less than 30 percent)	180	69.8%	165	49.7%	345	58.5%
Overpaying (30 to 50 percent)	68	26.4%	73	22.0%	141	23.9%
Severely Overpaying (50 percent or more)	10	3.9%	94	28.3%	104	17.6%
Total	258	100.0%	332	100.0%	590	100.0%

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2016-2020

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 the 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. Senior households may need assistance with personal and financial affairs, networks of care to provide services and daily assistance, and even possible architectural design features that could accommodate disabilities that would help ensure continued independent living..

According to the 2015-2019 ACS, senior-headed households made up approximately 26.5 percent (167 households) of the total households in Westmorland. Of these senior households, 108 or 17.1 percent were owner-occupied, and 59 or 9.4 percent were renter-occupied. Similarly, in the County, senior-headed households represented 27.5 percent (13,243 households) of the total households, with 18.7 percent being owner households and 8.7 percent being renter households, as shown in Table 9.

Table 9 Senior Population Trends (65+) (2019)

Tenure	Westmorland		Imperial County	
	Number	% of Total Households	Number	% of Total Households
Owners	108	17.1%	9,054	18.8%
Renters	59	9.4%	4,189	8.7%
Total Senior Households	167	26.5%	13,243	27.5%

Source: ACS 2015-2019

As documented in Table 14, senior households in the City (particularly those that rented their homes) were especially likely to experience a housing problem. Specifically, of all senior 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

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

B. Persons with Disabilities (Including Developmental Disabilities)

According to California Government Code Section 12926, a “disability” includes, but is not limited to, any physical or mental disability. A mental disability involves having any mental or psychological disorder or condition, such as mental retardation, organic brain syndrome, emotional or mental illness, or specific learning disabilities that limit a major life activity. A physical disability involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems, including neurological, immunological, musculoskeletal, special sense organs, respiratory, speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin and endocrine. In addition, a mental or physical disability limits major life activities by making their achievement difficult, including physical, mental, and social activities and working.

According to 2014-2018 ACS, the City of Westmorland had a disabled population of 372 persons or 14.1 percent of the total population in 2018. Table 10 provides additional characteristics for the disabled population. The ACS also tallied the number of disabilities by type for residents with one or more disabilities (see Table 10-9). Among the disabilities tallied, ambulatory (29.5 percent) and cognitive (19.8 percent) difficulties were the most prevalent. However, the types of disabilities experienced varied depending on the age of the disabled person.

Table 10 Types of Disabilities

Type of Disability	Percentage
<i>Hearing disability</i>	13.8%
<i>Vision disability</i>	10.3%
<i>Cognitive disability</i>	19.8%
<i>Ambulatory disability</i>	29.5%
<i>Self-care disability</i>	11.9%
<i>Independent disability</i>	14.7%
<i>Total</i>	100.0%

Source: SCAG Local Data, 2018 ACS

Note: Persons can have more than one type of disability.

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. According to the Department of Developmental Services, as of December 2021, the center served a total of 50 residents in Westmorland. Of these individuals, 35 were between the ages of 0 and 17, and 15 were 18 years and over (see Table 11)..

Table 11 Residents with a Developmental Disability

Zip Code	0–17 years	18+ years	Total Residents
92281	35	15	50

Source: Department of Developmental Services, December 2021

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

Large households are defined as households with five or more members. Large households comprise a special-needs group because of the need for larger dwelling units, with three or more bedrooms, which are often in limited supply and therefore command higher prices. To save for other basic necessities, such as food, clothing, and medical care, it is common for lower-income, large households to reside in smaller dwelling units, frequently resulting in overcrowding.

According to 2015-2019 ACS data, there were a total of 143 large households, representing 22.7 percent of the total households in Westmorland. Among these large households, 47 owner households and 143 renters made up of five or more persons (See Table 12).

In the same year, the majority of houses consisted of more than 3 bedrooms, representing 64 percent of the total housing units. Specifically, housing units with 3 bedrooms made up almost half of the total housing units within the city, accounting for 344 or 45.6 percent (See Table 13).

Housing options for large renter-households in the City are not sufficient to meet the needs of the 96 large renter-households in the ACS (2015-2019). Lower-income large renter households would have difficulty finding adequately sized and affordable housing in Westmorland.

Table 12. Tenure by Household Size, 2019

	Owner	Percentage	Renter	Percentage	Total	Percentage
1-person household	33	13.5%	113	29.4%	146	23.2%
2-person household	85	34.7%	60	15.6%	145	23.0%
3-person household	50	20.4%	69	17.9%	119	18.9%
4-person household	30	12.2%	47	12.2%	77	12.2%
5+ person household	47	19.2%	96	24.9%	143	22.7%
Total	245	100.0%	385	100.0%	630	100.0%

Source: ACS 2015-2019

Table 13. Number of Bedrooms per Unit

Source: ACS 2015-2019

Type of Room	Number	Percentage
Studio unit	26	3.4%
1 bedroom unit	59	7.8%
2 bedrooms unit	187	24.8%
3 bedrooms unit	344	45.6%
4 bedrooms unit	112	14.8%
5 or more bedrooms unit	27	3.6%
Total	755	100.0%

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 heads of households have a problem due to generally lower-income levels, having only a single source of income, often having the financial burden of childcare, and reluctance of some people to rent to them as a result of these difficulties. According to the ACS 2015-2019 data, there were a total of 131 female-headed households, which represented 20.8 percent of all households. Out of these female-headed households, 81 had children while 50 did not have children. Furthermore, 51.1 percent, or 67, of these female-headed households lived below the poverty level in the same year. . .

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, Approximately 27.0 percent (120 families) of the 444 family households living below the poverty level.. In addition to the family poverty, of 67 female-headed households living below the poverty level, 76.1percent (51 female households) of households had children under 18 years of age.

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. According to the *Profile of the City of Westmorland* prepared by the Southern California Association of Governments, 28.4% of Westmorland's employed population works in the agricultural sector.

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. According to the study published in the Journal of Agricultural Health and Safety found, 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.

There is no information on farmworker housing conditions specific to Westmorland. However, several farmworker-affiliated organizations across the State participated in a report published by the Community and Labor Center at the University of California (UC) Merced, including areas in the Imperial Valley. In the survey samples, the San Joaquin Valley constituted the largest surveyed group with 42 percent, followed by the Central Coast (26%), and the Imperial/Coachella Valley (20%). According to a 2022 report titled “Farmworker health in California” based on data from the Farmworker Health Study (FWHS survey, 92 percent of the participants rented and resided in single-family homes (55 percent) and about one-third of participants lived in apartments (31 percent). According to the FWHS survey, farmworkers generally experience living in substandard housing requiring repairs or in older homes, apartments, mobile homes, motels, garages, and other similar spaces with poor ventilation that puts them at higher risk for respiratory illnesses. One out of three farmworkers experienced difficulty keeping their home cool or warm, and more than 10 percent of surveyed farmworkers encountered mold, water damage, and water leaks. In addition, 37 percent of them indicated that the water quality was low, which could pose health risks. Furthermore, farmworkers surveyed reported living in overcrowded households with one-fourth of respondents (29 percent) reporting six or more persons per unit, and more than half (55 percent) reporting two persons (including themselves) slept in their room. As a result, substandard housing, affordability, and overcrowding are critical issues among this special-needs group. In particular, the inland regions of California, such as the Central Valley, Inland Empire, and Coachella Valley/Imperial Valley, have a high concentration of farmworkers. These areas can experience temperatures exceeding 110 degrees Fahrenheit during heat waves.

Specific to the Imperial Valley, 41% of the 241 respondents stated they live in a single-family home while 37% live in an apartment. The remaining, roughly 21% stated they live in an RV or a car. About 27% of respondents stated they have experienced issues keeping the house warm during the winter. Under 5% of respondents stated that the color of their water was “very bad or bad”, while the Imperial Valley indicated the highest quality of water with 25.5% of respondents stating “very good”. Last, the survey indicated that the median household wage for farmworkers in the Imperial/Coachella Valley was \$24,000.

Resources

Farmworkers 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 homelessness 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.

The City contacted local organizations such as churches, civic groups, and the school district for any information regarding homelessness. The Westmorland Elementary School District (WESD) reported that there are currently 41 students under the McKinney Vento Program. The McKinney-Vento Act provides rights and services to children and youth experiencing homelessness, which includes those who are: sharing the housing of others due to loss of housing, economic hardship, or a similar reason; staying in motels, trailer parks, or camp grounds due to the lack of an adequate alternative; staying in shelters or transitional housing; or sleeping in cars, parks, abandoned buildings, substandard housing, or similar settings. WESD's boundaries extend well beyond the City's boundaries and these 41 students are likely outside of the City's incorporated boundaries. There is only one hotel or motel in the City and they did not report any long-term residents. There are no trailer parks, campgrounds, or other similar facilities in the City.

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. Table 14 shows resources for persons experience homelessness in Imperial County

Table 14: Homeless Resources in Imperial County

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	Senior Living
(Empowering People with Disabilities)	Supportive Services
Salvation Army	Supportive Services
IVROP	Supportive Services
IVROP Foster Youth Services	Supportive Services

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

H. Extremely Low-Income Households

The category Extremely Low-Income (ELI) households 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.

According to CHAS 2016-2020, ELI households (160 households) comprised 27.1 percent of total households. Of those, the majority, approximately 87.5 percent of ELI households were renters while only 12.5 percent were owners. ELI renter households represented approximately 16.8 percent of the total household population, and ELI homeowner households made up approximately 6.2 percent of all Westmorland households.

Approximately 78.1 percent of all ELI households experienced cost burdens, spending more than 30 percent of their income on housing compared to 71.0 percent of very low-income households and 10.7 percent of low-income households.

ELI households also have high rates of overcrowding, compared to all households, but lower than VLI households). 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 it meets 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.

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.

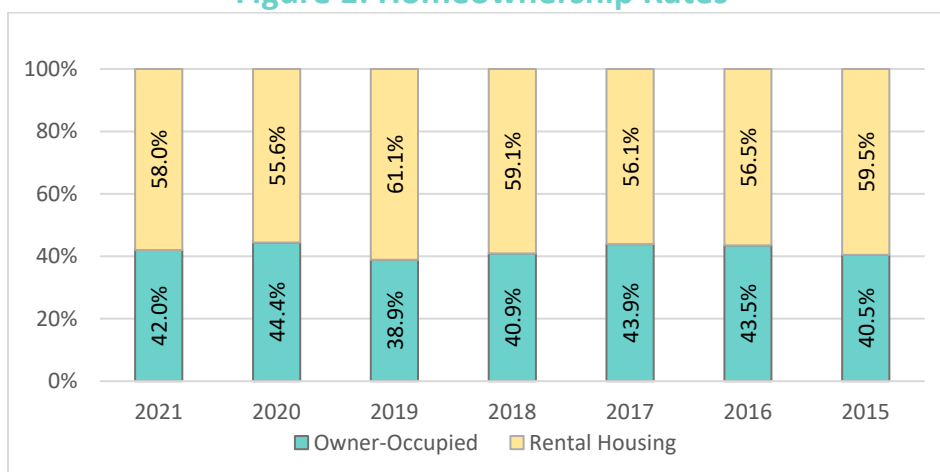
In 2015 - 2019, the ACS estimated a vacancy rate of 15.9 percent for the City of Westmorland. In 2006 - 2010, the ACS estimated the vacancy rate for Westmorland to be 8.5 percent.

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. In the years between 2015 and 2021, homeownership rates fluctuated between 38.9% to 44.4% (See Figure 1).

Figure 1: Homeownership Rates



Source: US Census ACS 5-Year Estimates

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.

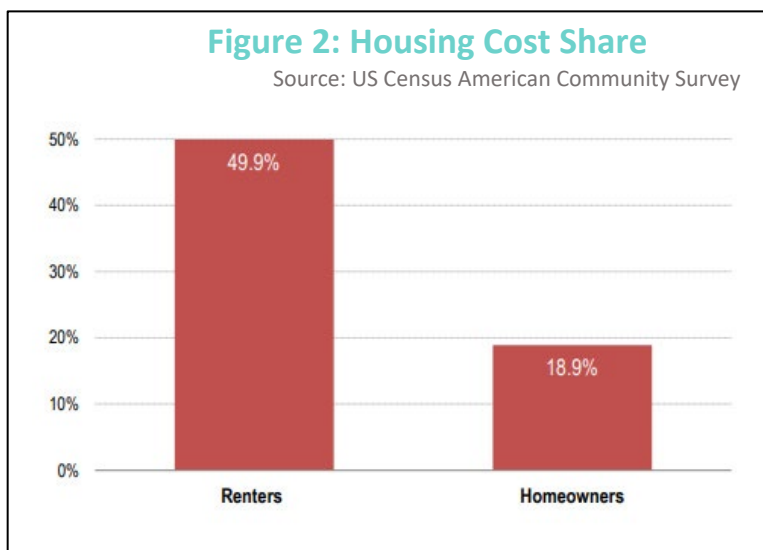
During this same time period, changes to median home prices in small neighboring jurisdictions were also significant. Calipatria had a large (206.7 percent) increase in median price. The largest increase occurred in the City of Holtville (249.7 percent) while the smallest increase was in Brawley (82.1 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. As shown in Figure 2, housing costs for renters account for nearly 50% of housing costs, compared to only 18.9% for homeowners (See Figure 2).

Figure 2: Housing Cost Share

Source: US Census American Community Survey



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 multifamily 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

Existing housing that receives governmental assistance or obtained a governmental subsidy for its construction is often a significant source of affordable housing in many communities. State housing element law requires cities to prepare an inventory of all assisted housing units that are available or at risk to convert to non-low-income housing due to termination of subsidy contract, mortgage prepayment, and/or expiring use restrictions. The inventory, within Westmorland, includes 194 assisted units in six deed-restricted affordable housing developments. As shown in Table 15 below, there are no units that are at-risk of converting to market rate within the 6th cycle 2021-2029 time frame. The earliest expiration date for deed restrictions is 2059.

Table 8 Existing Affordable Housing and At-Risk Assessment

Project	Financing	Assisted Units	Target Income Group	Expiration Date
Redondo I 201 North G St.	USDA 515 Preservation Funds State Tax Credits	36	Low Income Families	2062
Redondo II 301 North G St.	USDA 515 Preservation Funds State Tax Credits	32	Low Income Families	2062
Westmorland Apts. 181 South G St.	HOME State Tax Credits	65	Low Income Families	2059
IVHA 6th Street 155 West 6 th St.	HOME HUD Public Housing	15	Very Low-Income Seniors	In perpetuity
IVHA 3rd Street 182 West 3 rd St.	HOME HUD Public Housing	12	Very Low-Income Families	In perpetuity
IVHA 1st Street 217 East 1 st St.	HOME HUD Public Housing	34	Very Low-Income Families	In perpetuity

Sources: Imperial Valley Housing Authority (IVHA), Hyder Management, City of Westmorland, and Chelsea Investment Corporation

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.

The City of Westmorland held public workshops and study sessions to receive input from the local community. These workshops were conducted in person in an outdoor setting. Notices for the workshops were posted at the local U.S. Post Office, City Hall Bulletin Boards and notices were sent out to all residents. Residents were also given the opportunity to provide comments via mail or email. There were no comments relating to Affirmatively Furthering Fair Housing (AFFH).

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.

A. 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 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.

Land Costs

The cost of raw land typically accounts for a large share of total housing production costs. Increased land costs appear to be one of the major contributing factors to the rapid rise in housing prices and rents that the Imperial Valley has experienced in recent years. Land costs vary depending on whether the site is vacant or has an existing use that must be removed, or whether the site has physical or environmental issues that must be mitigated (e.g., steep slopes, soil stability, seismic hazards, or flooding).

Supply and demand is an important factor on land cost and the shortage of developable land can drive up the demand and cost of housing construction. Residential land in the City of Westmorland is substantially built out, with little or no vacant land available for development of any type. Precise land costs are difficult to determine in Westmorland due to the limited number of real estate transactions, and there are currently no vacant residential parcels listed for sale within city limits. Vacant agricultural land is currently for sale to the west of city limits at a price of \$1.1 million for approximately 93 acres of land which equates to

Land cost in Westmorland is low and not considered to be a significant constraint in providing for affordable housing. However agricultural land just outside the city limits is considered premium land and any large-scale development would require expansion into these areas and be more expensive. The City of Westmorland has adopted a Density Bonus Ordinance to help mitigate against the cost of land. Senate Bill 728, which was approved by the Governor on September 28, 2021, contained additional provisions in the Density Bonus Law and the City is required to amend its Ordinance. The City anticipates the completion of the Zoning Ordinance update to comply with the current State Density Bonus Law by the end of 2023. No additional program is warranted at this time to mitigate land costs.

B. 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. There are currently no city-based financing programs, but cities have access to a variety of existing and potential funding sources available for development activities for housing to meet the needs of low- and moderate-income groups. The different available and potential financial resources for the preservation and development of housing affordable to these targeted income groups, as well as the provision of housing subsidies for lower- and moderate-income residents in Westmorland, are discussed in this section. This section includes some of the most common funding sources available to support implementation of the City's housing goals and include federal, state, and local resources.

HUD Section 8 Housing Choice Voucher Assistance

The Section 8 program is a federal program under the US Department of Housing and Urban Development (HUD) that provides rental assistance to very low-income persons in need of affordable housing. The Section 8 program was authorized by Congress in 1974 and developed by HUD to provide rental subsidies for eligible tenant families (including single persons) residing in newly constructed, rehabilitated, and existing rental and cooperative apartment projects. The rents of some of the residential units are subsidized by HUD under the Section 8 New Construction, Substantial Rehabilitation, and/or Loan Management Set-Aside programs. All such assistance is project-based, i.e., the subsidy is committed by HUD for the assisted units of a particular mortgaged property for a contractually determined period. The Section 8 program offers a voucher that pays the difference between the current fair market rent and what a tenant can afford to pay (e.g., 30 percent of their income). The voucher allows a tenant to choose housing that may cost above the payment standard, but the tenant must pay the extra cost. The Imperial Valley Housing Authority (IVHA) administers the Section 8 Housing Choice Voucher Program for Westmorland.

USDA Rural Housing Service Programs (RHS)

Under US Department of Agriculture (USDA) Rural Housing Services (RHS), communities can access a variety of housing programs to subsidize housing and retain affordability for low- and very low-income households. Programs include but are not limited to the following:

- Section 515 Rental Housing Program—The Section 515 Rental Housing Program provides long-term financing and rental assistance payments on behalf of lower-income households to developer/operators of new rental housing. Westmorland is an eligible locality for Section 515 financing and the program has been well utilized in the city.
- Section 502 Direct Loan Program—Under the Direct Loan Program, individuals or families receive direct financial assistance directly from the Housing and Community Facilities Programs in the form of a home loan at an affordable interest rate.
- Section 502 Guaranteed Loan Program—Under the Guaranteed Loan Program, the Housing and Community Facilities Programs guarantees loans made by the private

sector. The individual works with the private lender and makes his or her payments to that lender.

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, mobile homes, 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 16 below describes Westmorland's zoning for a variety of housing types. Table 17 lists the housing types permitted in the residential zones and one commercial zone.

Table 9 Zoning for a Variety of Housing Types

Housing Type	Zoning Ordinance Provisions
Multifamily Rental Housing	Permitted by right in the R-2 and R-4 Multi-Family Zones.
Factory Built Housing, Manufactured Homes, and Mobile homes	The Zoning Ordinance defines factory-built housing pursuant to Health and Safety Code Section 19971; manufactured homes pursuant to Health and Safety Code Section 18007; and mobile homes pursuant to Health and Safety Code Section 18008. These housing types are permitted in residential zones.
Agricultural Housing	The Zoning Ordinance defines employee housing pursuant to Health and Employees Safety Code Definition 17021.5 and 17021.6. Employee housing is treated as a residential use and is permitted in R-1 Zone and R-2 Zone. Health and Safety Code Section 17021.6 is addressed in the Zoning Ordinance because the OS - Open Space Zone permits "Agricultural land and areas of economic importance for the production of food and fiber." It should be noted that both the Land Use Element and Zoning Map designate only two OS sites - the existing City Hall site and the existing Westmorland Elementary School. This Housing Element includes a program to allow farmworker housing in R-2 zones.

Housing Type	Zoning Ordinance Provisions
Supportive Housing	Zoning Ordinance definition complies with Government Code Section 65582(g) and such housing is treated as a residential use which complies with Government Code Section 65583(a)(5). Supportive housing is a permitted use in the Single-Family Residential Zone, R-2 Zone and R-4 Zone, subject only to the same restrictions applied to other residential uses in those three zones. Residential land uses are not permitted in the C - Commercial Zone; I - Industrial Zone; and OS - Open Space Zone. The Zoning Ordinance definition is: "Supportive housing" per Government Code Section 65582(f) means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.
Single Room Occupancy Units	Zoning Ordinance definition is modeled after State's efficiency dwelling definition (Health and Safety Code Section 17958. 1). "Single room occupancy housing" means a dwelling unit within a multiple family dwelling structure with a room that includes a closet, sink and stove, range top or oven and space for a bed and a bathroom (toilet, sink and bathtub). A SRO unit shall accommodate a maximum of two persons. SROs shall be 275 SF to 450 SF. Stand-alone SROs shall have a minimum of 16 housing units. SROs are a use permitted by right in the R-2 Zone and R-4 Zone
Emergency Shelters	Emergency shelters are a use permitted by right in the C Commercial Zone (Downtown Westmorland). Emergency shelters are defined pursuant to Health and Safety Code Section 50801(e). The Zoning Ordinance establishes development and management standards consistent with Government Code Section Government Code Section 65583(4)(A)(i)-(viii). The C zone, which is located along State Highway 86, is seven blocks in length. It contains most of the City's non-residential land uses. Bus stops are located on State Highway 86 for service provided by Imperial Valley Transit. Clinicas de Salud del Pueblo, a community based healthcare clinic, and the Pioneers Memorial Hospital are located seven miles east of Westmorland in the Brawley. In accordance with Government Code Section 65583 (e), (Assembly Bill 2339), the Housing Element must identify potential sites for emergency shelters in zones that allow residential uses. While the C zone does not currently allow for residential uses, the City has included program 8 to amend the zoning ordinance and allow emergency shelters in the R-4 zone. The City will also update the definition to emergency shelter to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. AB 2339 also requires jurisdictions to show that there is capacity for an emergency shelter should there be a need to develop one. The site inventory (Table 29) identified a 7.15-acre vacant lot to accommodate the RHNA. The City is only relying on 50 percent of the capacity to meet the RHNA therefore leaving 50 percent that site could be developed with an emergency shelter, if needed.

Housing Type	Zoning Ordinance Provisions
Transitional Housing	The Zoning Ordinance definition complies with Government Code Section 65582(f) and such housing is treated as a residential use which complies with Government Code Section 65583(a)(5). Transitional housing is a permitted use in the R-1 Single-Family Zone, R-2 Zone and R-4 Zone, subject only to the same restrictions applied to other residential uses in those three zones. Residential land uses are not permitted in the C - Commercial Zone; I - Industrial Zone; and OS - Open Space Zone. The Zoning Ordinance definition is: "Transitional housing* per Government Code Section 65582(h) means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at some predetermined future point in time that shall be no less than six months from the beginning of the assistance.
Second Dwelling Unit	Zoning provisions comply with Government Code 65852.2. Second dwelling units are a use permitted by right in the R-1 Zone and R-2 Zone. Second units may be rented provided that they are rented to very low- and low-income households.
Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Unit (JADUs)	The Zoning Ordinance does not currently contain any specific provisions with regards to ADUs and JADU's. However, the City complies with all current State Law requirements with regards to ADUs and JADUs. A Housing Element Program has been included to address these requirements.

Source: Westmorland Zoning Code

Table 10 Zones Permitting Different Housing Types

Housing Type	Zone			
	R-1	R-2	R-4	C
Single Family Housing	P	P	-	-
Multifamily Rental Housing	-	P	P	-
Factory Built Housing	P	P	P	-
Manufactured Housing	P	P	P	-
Mobilehomes	P	P	P	-
Mobile Home Park	-	-	P	-
Employee Housing	P	P	-	-
Supportive Housing	P	P	P	-
Single Room Occupancy (SRO)		P	P	-
Emergency Shelters	-	-	-	P
Transitional Housing	P	P	P	-
Second Dwelling Unit	P	P	-	-

Source: Westmorland Zoning Code

Residential Development Standards

Housing element law requires an analysis that specifically addresses requirements related to parking, heights, lot coverage and limits on allowable densities. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. Development standards outlined in the Westmorland Zoning Ordinance facilitate the development of housing in a range of residential densities. A summary of these development standards are shown in Table 18, below. The R-1 Zone development standards provide for the development of traditional single-family housing development on lots having a minimum of 6,000 SF. The R-2 Zone development standards facilitate the development of garden style, low rise apartment communities. The R-4 Zone development standards facilitate the development of higher density apartment communities. The residential zones do not set forth a maximum number of stories. A three-story, multi-family rental housing development can be developed within the 35' maximum building height. In summary, the development standards do not constrain the production of new housing.

Table 18 Development Standards in Residential Zones

Zoning District	Maximum Building Height	Lot Width and Depth	Setbacks			Minimum Lot Size	Maximum Density (du/ac) ¹	Parking (spaces per unit)
			Front	Side	Rear			
R-1	35'	50' 120'	20'	5'	20'	6,000sf	1.7	1.5
R-2	35'	50' 140'	20'	5'	20'	7,000sf	6.1-8.0	1.5
R-4	35'	50' 140'	15'	5'	20'	7,000sf	8.1-30.0	1.5

Source: Westmorland Zoning Code

¹ Density is dictated by the Westmorland General Plan

The City's development standards are consistent with development standards throughout Imperial County. The maximum building height of 35' can accommodate up to a 3-story building, but with land prices in Imperial County being lower than other regions of California, it is more cost effective to build structures that are less than three stories. Other development standards include maximum building coverage which is 50% for all residential zones. This is not a constraint on affordable housing as the inclusion of amenities such as parking, open space, recreational elements, and similar items would not lead to exceedances of the 50% lot coverage. Regardless, the city allows for deviations from these standards are allowed under the Density Bonus Ordinance for affordable housing projects.

Other development standards also include building code. The City of Westmorland enforces the 2022 California Building Code and did not include any amendments. Therefore, the building code is not considered a constraint on housing supply or housing costs.

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.

On/Off-Site Improvements

Streets, sidewalks, water and sewer, drainage, curbs and gutters, street signs, park dedications, utility easements, and landscaping are normally part of all residential subdivision projects. Larger projects and projects that are further away from existing infrastructure may be required to provide more on-site and off-site improvements that can potentially affect housing costs. However, this is not the case in Westmorland. There are no parcels in Westmorland that are less than 5 acres. New multi-family homes will be required to construct sidewalks and drainage improvements which add to the cost of development. These improvements are typically only limited to the frontage of the parcel and to the end of the street. Since these are minimal costs, they are not considered a constraint on housing supply or cost.

Development Fees and Exactions

Several planning actions require the payment of fees by the applicant. Table 19 lists the various planning actions and associated fees.

Table 19 City of Westmorland Planning Application 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

Planning Action	Fee
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

Source: City of Westmorland

Impact fees also are charged to developers in the form of per unit fees, collected at building permit issuance. Table 20 below lists the per unit fees for multi-family and single-family residential uses.

Table 20 Development Impact Mitigation Fees (Per Unit)

Impact Fee Category	Per Unit Fees	
	Multi-Family	Single-Family
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 School District	\$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.

B. 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 contracted 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 21 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 the purpose 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 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.

It is important to note that these are projected timelines based on processing timelines for similarly sized cities in Imperial County. There have not been any major housing projects in Westmorland for the past 10 years. Many of the residential project that have been completed in the recent past have been ministerial projects not requiring any discretionary approvals, thus it is difficult to determine the length of time between receiving approval for housing development and submittal of application for building permits. The City does not foresee any hinderances on housing development related to timing between receiving approval for housing development and submittal of application for building permits.

Table21 Development Approval Process Timing

	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
Environmental Review	No CEQA	CEQA Environmental Review – Time per State law	CEQA Environmental Review – Time per State law

Source: City of Westmorland

The City's Zoning Ordinance is available on the city website at www.westmorland.net. However, the Zoning Map, other development standards, and the fee schedule are not currently available. Program 15 is included in this Housing Element to address the required transparency issues.

Senate Bill 35 (SB 35) became effective on January 1, 2018 and enacted a state law that changed the local review process for the development of certain housing projects. SB 35 applies to California cities and counties where production of new housing has not met the state-mandated Regional Housing Need Allocation (RHNA) targets. The California Department of Housing and Community Development (HCD) determined that Westmorland is subject to the requirements of SB 35. As such, Westmorland must use a streamlined, ministerial review process for qualifying multifamily residential projects. A ministerial review does not involve subjective judgment and requires no public hearings, provided the proposal meets previously established and objective standards. Multifamily housing developments that comply with Westmorland's objective planning standards, designate at least 10% of all proposed units as affordable, and meet other specific requirements, may be eligible for the SB 35 streamlined review process in Westmorland. Program 15 has been included in this 6th Cycle Housing Element to establish written procedures for the SB35 Streamlined Processing of Ministerial Projects.

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.

C. Zoning and Development Standards

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 the purpose 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 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.

There are no other locally adopted ordinances such as those that deal with inclusionary requirements, short term rentals, growth controls that would affect the cost and supply or residential development.

D. Housing for Persons 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.

There are a number of housing types appropriate for people living with a disabilities: rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Housing Choice Vouchers (HCV), special programs for home purchase, and HUD housing. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group-living opportunities represent some of the types of considerations that are important in serving this needs group. Incorporating “barrier-free” design in all new multifamily housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, because people with disabilities may be living on a fixed income.

In consultation with San Diego Regional Center, the City will implement programs to coordinate housing activities and outreach and encourage housing providers to designate a portion of new affordable housing developments for persons with disabilities, especially persons with developmental disabilities, and pursue funding sources designated for persons with special needs and disabilities. Table 22 lists additional services available for persons with disabilities.

Table 22 Available Services for Persons with Disabilities

Provider	Area Served	Services Available
San Diego Regional Center	Imperial and San Diego counties	Early Intervention Services program provides a wide range of services to children under the age of three with developmental delays and disabilities to ensure that they are given the care and support that they need.
ARC Imperial Valley	Imperial County	Arc Imperial Valley offers intermediate Care Facility for adults with intellectual disabilities, Arc’s Residential Services the Developmentally Disabled. Arc Imperial Valley serves as offering qualified individuals a chance to work on federal government contracts and ADA Paratransit’s services.
Aging & Disability Resource Center (ADRC)	Imperial County	An Aging & Disability Resource Center (ADRC) serves as a crucial single point of entry into the Long-Term Services and Supports (LTSS) system, streamlining access and providing a centralized hub for various individuals and groups. This center is dedicated to providing invaluable support and information to older

Provider	Area Served	Services Available
		adults and individuals with disabilities, without any restrictions based on income
The Adult Protective Services (APS)	Imperial County	The Adult Protective Services (APS) program provides prevention, intervention and protective services for dependent and disabled adults and the elderly

Article VI, Section 6.03 (Reasonable Accommodation for Persons with Disabilities) outlines the City's procedures for evaluating reasonable accommodation requests. Specifically, subsection (d) grants the authority to the Planning Director to consider and take action on requests for reasonable accommodation, including but not limited to, ramps, walls, handrails, or other physical improvements. In the event of a denial of a reasonable accommodation request, the applicant is granted the ability to request an appeal hearing.

The required findings for reasonable accommodation include the following:

- (a) The housing which is the subject of the request for reasonable accommodation(s) will be used for an individual protected under the Fair Housing Act.
- (b) The request for reasonable accommodation(s) is necessary to make specific housing available to an individual protected under the Fair Housing Act.
- (c) The requested reasonable accommodation(s) does not impose an undue financial or administrative burden on the City and does not fundamentally alter City zoning, development standards, policies, or procedures.
- (d) The requested accommodation will not result in a fundamental alteration in the nature of the City's zoning program, as "fundamental alteration" is defined in fair housing laws and interpretive case law.
- (e) The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health or safety of other individuals or substantial physical damage to the property of others.

The required standards for evaluating reasonable accommodations are objective and consistent with those laid out in HCD's Reasonable Accommodation Checklist.

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 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 CUP process is in place to ensure that

larger group homes are adequately sized to accommodate the 7+ persons and is not intended to limit the housing supply for persons with disabilities. Nevertheless, this Housing Element Update includes a program to minimize constraints to housing for persons with disabilities as it relates to larger group homes. The Program will also include a Zoning Ordinance Amendment to:

- broaden the definition of family that 1) provides zoning code occupancy standards specific to unrelated adults and 2) complies with fair housing law;
 - Include siting or separation requirements for licensed, residential-care facilities to determine the extent to which the local restrictions effect the development and cost of housing;
 - Include any minimum distance requirements in the land-use element for the siting of special needs housing developments do not impact the development and cost of housing for persons with disabilities; and
 - Include alternate residential parking requirements, including reduction, for people with disabilities.
- 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.

4. AFFIRMATIVELY FURTHERING FAIR HOUSING

All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015. Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

A. Outreach

As part of the Housing Element Update, the City of Westmorland held public workshops and study sessions to receive input from the local community. 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.

Barriers to Participation

While the community participation was conducted via zoom, community involvement remained low during the Planning Commission and City Council meetings. Due to the COVID-19 pandemic, the City was forced to cease all planned in person meetings and rely on broadcasting them via zoom. While the community was given access via zoom, participation remained low during the Planning Commission and City Council meetings.

The City has also been providing information regarding fair housing, tenant protection, and housing discrimination at City Hall, the local library, and the city website. The lack of public comments and responses has made it clear that the current methods of information distribution have been inadequate. As a result of this analysis, the City has modified Program Number 17 accordingly in order to improve public participation and comments received for future iterations of the Housing Element.

B. Assessment of Fair Housing

The California Rural Legal Assistance (CRLA), based in the El Centro, provides arbitration for private housing disputes for extremely low- and low-income households in the Imperial County. The CRLA receives funding through the Federal Legal Services Corporation and State IOLTA Trust Fund operated by the California Bar Association. The CRLA has established a Community Advisory Council with one member from each community. Each member must be low income and a former or present client of the CRLA.

The City of Westmorland refers all fair housing complaints to the CRLA or the Civil Rights Division of the Department of Housing and Economic Development (HCD). An internal review of City documentation has found that no fair housing complaints were received within the past decade. Further analysis has determined that the lack of available information may directly affect the number of complaints received by the City. While the City has been promoting housing laws, programs, and resources; information specifically referring to fair housing complaints is unavailable. Program Number 11 has been modified to address possible fair housing complaints within Westmorland.

As shown in the Department of Housing and Community Development's (HCD) AFFH Data Viewer, there have been less than 0.1 Fair Housing Enforcement and Outreach (FHEO) cases filed per 1,000 population in the Imperial County. This data supports the analysis of internal documents which shows the lack of complaints within the past decade.

C. Integration or Segregation Patterns

Diversity

The City of Westmorland is composed primarily of minority populations which are largely comprised of Hispanics. According to the HCD AFFH Data Viewer, the most common race in Westmorland is Hispanic or Latino, accounting for 87.4% of the population. White, non-Hispanics account for 11.0%, Black or African-Americans comprise 0.5%, and the remaining are Asians or two or more races. The prevalence of Hispanic or Latino population can be attributed to Westmorland's proximity to the US-Mexico Border. The AFFH Data Viewer further shows that there is low-medium segregation in the City and the surrounding rural areas. A high concentration of the non-white population is also prevalent within the County of Imperial, ranging from approximately 61-80% of the population. The sparsely populated areas in the eastern portion of the county, primarily in the unincorporated areas surrounding Holtville and the Glamis desert area, is primarily made up of 53.7% white alone, non-Hispanic or Latino.

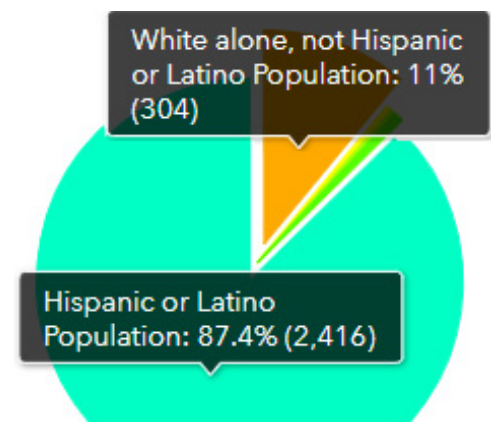


Figure 3 Predominant Race

Source: AFFH 2.0 Data Viewer, California
Department of Housing and Community
Development

Demographic Trends

Analyzing demographic trends can help identify any increase or decrease concentration of a particular ethnic group, sex ratio, etc. Westmorland's population decreased by 9.5% between 2010 and 2020 (from 2,225 in 2010 to 2,014 in 2020), but its total minority population increased by 14.9% between 2010 to 2020 as shown in the Table 23 below. The most dramatic increase was in the population group of two or more races, but there was an almost equal amount of decrease in the population group of some other race. While the overall minority population has increased, the Black/African American, Asian, and American Indian/Alaskan Native populations remained stable. The increase in the percentage of minority population can be attributed to the decrease in overall population which suggests that a segment of the population may be moving out of Westmorland to seek other housing options, including larger, move-up homes. These demographic trends are similar to trends in the County.

**Table 23 City of Westmorland and County of Imperial
Minority Population, 2010 and 2020**

Race	Westmorland				Imperial County			
	2010		2020		2010		2020	
	Number of Persons	Percentage o	Number of Persons	Percentage	Number of Persons	Percentage	Number of Persons	Percentage
Black/African American	21	0.9%	23	1.1%	5,114	2.93%	3,846	2.14%
American Indian/Alaska Native	38	1.7%	30	1.5%	1,642	0.94%	1,584	0.88%
Asian	11	0.5%	11	0.5%	2,201	1.26%	2,244	1.25%
Native Hawaiian/Pacific Islander	0	0.0%	0	0.0%	1,642	0.94%	82	0.05%
Some other race	1,042	46.8%	683	33.9%	189	0.11%	519	0.29%
Population of Two or More Races	75	3.4%	627	31.1%	1,097	0.63%	1,439	0.80%
Total Minority Population	1,187	53.3%	1,374	68.2%	152,156	87.18%	162,741	90.56%
Total Population	2,225	100.0%	2,014	100.0%	174,528	100.00%	179,702	100.00%

Source: Decennial Census, US Census Bureau

Persons with Disabilities

Disabled persons often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. As discussed in Table 2-9, 14.1 percent of the total population in the City of Westmorland has at least one disability. Ambulatory disabilities accounted for the highest percentage at 29.5%, followed by cognitive disabilities at 19.8%. The County had a similar trend, with 14.4 percent of County's total population (24,583 residents).

The AFFH Data viewer shows that there are 262 residents (or 9.5% of the population) has some form of disability. This percentage is similar to other rural Cities like Calipatria and Holtville, but far less than the majority of jurisdictions in Imperial County. The highest disability rates are found in the heavily populated Cities of El Centro, Brawley, and Imperial indicating that the City of Westmorland does not have a disproportionate concentration of persons with disabilities when compared to the region or a smaller percentage of persons that would indicate barriers to this population.

Seniors aged 65 and older are the population most likely to have an ambulatory, visual, or hearing disability. Since 2010, the population aged 65 and older has decreased from 356 to 290 while the number of people living in Westmorland has stayed the same at 2,225 people. The fact that the population is not aging in place means that the senior population may be moving out of Westmorland due to the lack of housing options.

The City currently allows residents to retrofit homes to make it more suitable for persons with disabilities. This program is for persons with any disability, not just for the elderly. While retrofitting is already available to all residents with a disability, the City will search for funding to assist residents with retrofitting as part of Program Numbers 7 and 13. The program also involves cooperation with disability service providers to develop an outreach program, and local developers to ensure that new developments are suitable for persons with disabilities. Additional goals for the program include working with disability service providers to identify whether there is an unmet demand for services within the City. The City will update its Zoning Ordinance to allow residential care homes for seven or more persons within all residential zones. These homes will ensure that elderly residents are able to have a place with access to the resources they need.

Familial Status

Familial status refers to the relationships of people living together. Under the Federal Fair Housing Act and the California Fair Employment & Housing Act, "familial status discrimination" is defined as unfair treatment by a housing provider because an individual has children. These laws ensure that families with children have the right to live in their housing on an equal basis with other residents. Also protected under "familial status" is any person who is pregnant or is in the process of securing legal custody of any individual who has not yet attained the age of 18 years.

According to the Census, there are 102 householders in Westmorland living alone which accounts for only 4.9% of the population. This suggests that over 95% of the population are family households, and indeed, the Census shows that 51% of the households are those with one or more people under the age of 18. The same can be said about the other Cities within the Imperial County.

According to the AFFH Data Viewer, 33.3% of the population in Westmorland are in households living with a spouse. This is consistent with the incorporated areas in the County where 20-40% of the population are in households living with a spouse.

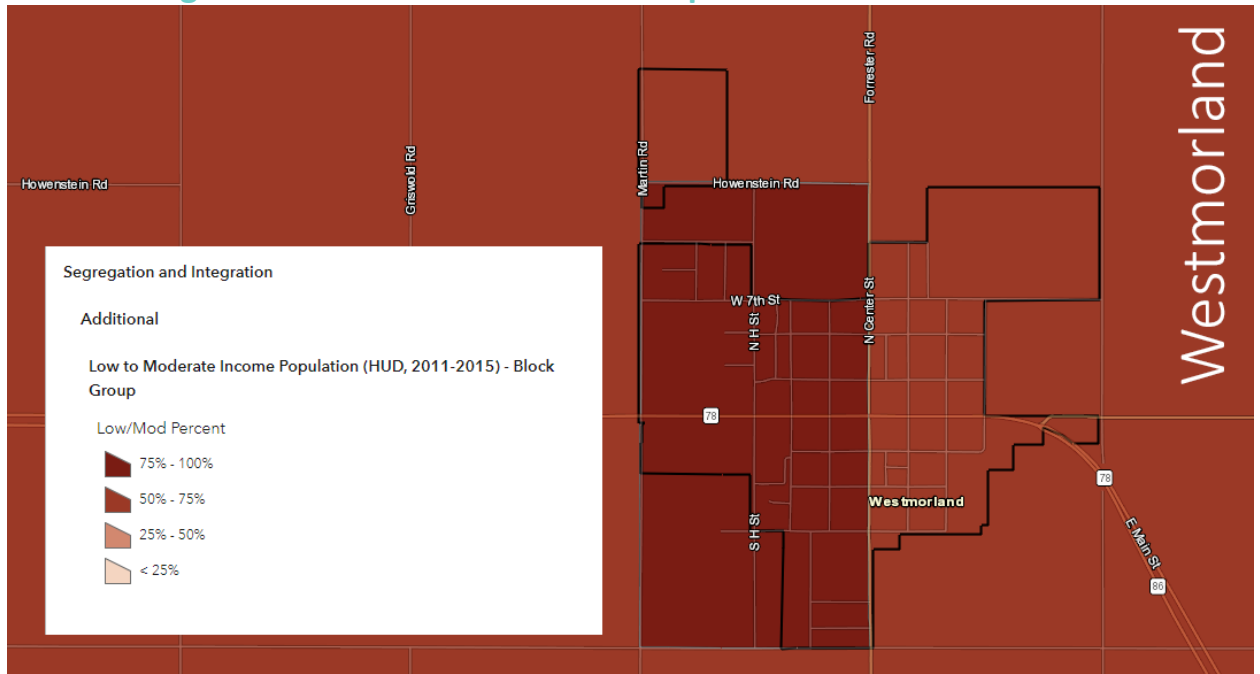
As discussed in Section 2.6.C of this Housing Element, the vacancy rate has increased during the past 10 years from 8.5% to 15.9%. While this may suggest that there is no shortage of homes for the various housing types, the number of bedrooms may be an indicator as to the higher rate of vacancies and the change in familial types of the decades. 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.

Single parent households, in particular female-headed families, often require special assistance such as accessible day care, health care, and other supportive services. According to the 2019 US Census American Community Survey, of the 592 total households in Westmorland, approximately 37.5% (222 households) female householder, with no spouse or partner present. This is significantly higher than the countywide figure of 19.1 %. Due to their low income and higher family expenses, many single parent households live close to or in poverty. The AFFH Data Viewer shows that 42.8% of the children in Westmorland are in Female Householder with No Spouse Present. While the city will meet the demand for affordable multi-family units throughout the 6th RHNA cycle, that alone will not be enough to meet the remaining needs of female-headed families. The City will implement a program to assist female-headed households by working with the Imperial Valley Housing Authority to increase the number of Housing Choice Vouchers in the city. Additional help will come from working with nonprofit organizations such as Womanhaven and the Salvation Army.

Income and Race

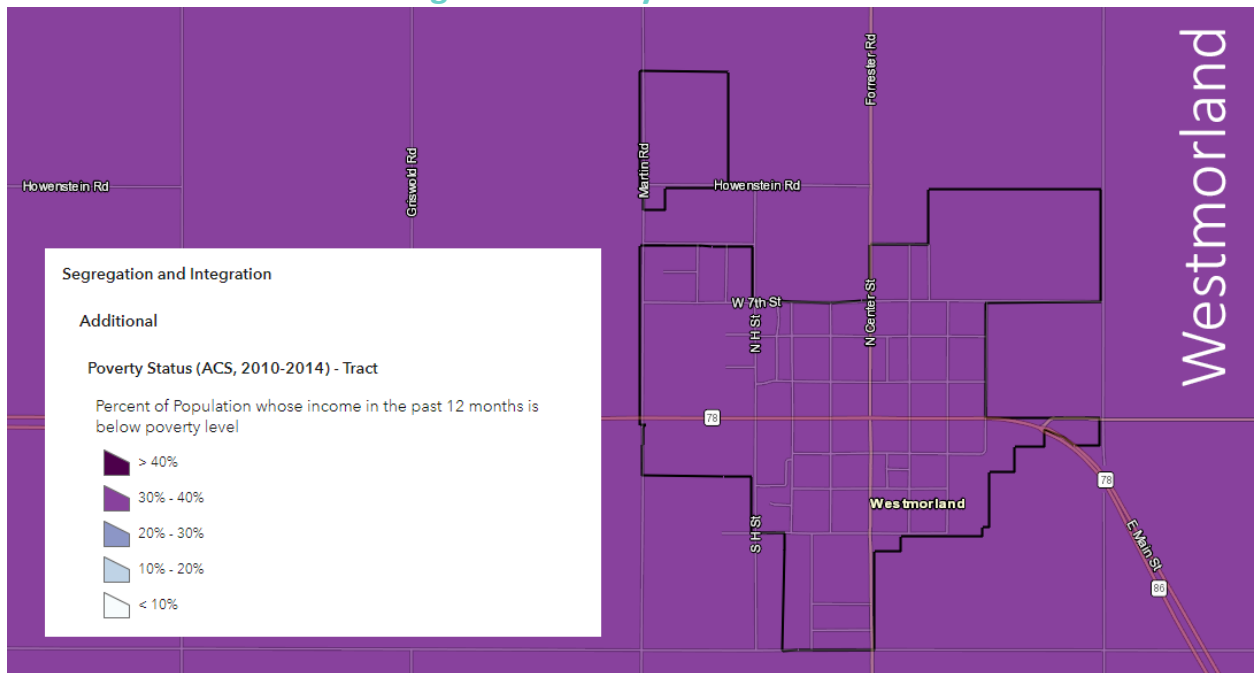
Per the 2021 US Census American Community Survey 5-Year Estimates, the median household income Westmorland is \$33,444, which is lower than the county median income of \$51,809 and significantly lower than the state median income of \$84,907. As shown on Figure 4, the western half of the City is comprised of 78% low-moderate income households while the eastern half is 54%. The citywide distribution of median household income is shown in Figure 20 and the distribution of low- to moderate-income households (those with an Area Median Income of 80% or less) is shown in Figure 22. Figure 24 shows the spatial distribution of the percentage households within the City of Westmorland living below the poverty line, and Figure 25 shows the distribution within the Imperial County. Though the City of Westmorland has disproportionately low incomes when compared to other larger cities in the county, within the city, households with particularly low incomes are concentrated in the northeast census tracts. Regionally, incomes tend to be lower in the northern portion of the county closer to the Cities of Calipatria and Holtville.

Figure 4 Low-Moderate Income Population Distribution



Source: AFFH 2.0 Data Viewer, California Department of Housing and Community Development

Figure 5 Poverty Status



Source: AFFH 2.0 Data Viewer, California Department of Housing and Community Development

The United States Department of Housing and Urban Development (HUD) prepares maps of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) throughout the country. To be classified as a R/ECAP, a census tract must have a population that is at least 50% nonwhite and a “poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.” Because poverty is often closely correlated with race and ethnicity, examining poverty in relation to these variables is key to understanding the economic makeup of a city. Examining the spatial distribution of poverty along racial and ethnic lines enables cities to understand if there are racially or ethnically concentrated areas of poverty. A search of AFFH Data Viewer shows that there are no R/ECAPs located within the City of Westmorland. The closest RECAPs is located over twenty miles southeast towards the City of El Centro. While no RECAPs are located within the City, twenty to thirty percent of the population of Westmorland is living below the poverty line.

Beginning on January 1, 2020, under California Government Code 12927 (i), landlords must accept Housing Choice Vouchers as an acceptable source of Income for tenants. The Imperial Valley Housing Authority (IVHA) administers the Housing Choice Voucher Program (commonly referred to as Section 8), which is a federally funded program helping low-income households afford decent, safe and sanitary housing. Section 8 provides eligible households the opportunity to rent housing of their choice in the private market. Housing Assistance Payments (HAP) are provided on behalf of the household each month to the landlord. The household is responsible for paying the difference between the contract rent charged by the landlord and the amount subsidized by IVHA.

There are currently 65 Housing Choice Vouchers in Westmorland. This is far less than the 175 vouchers in the City of Calexico and the over 1,000 in the City of El Centro. While the number of vouchers in Westmorland is slightly larger than the rural, unincorporated areas in the County, the number still falls is still a relatively small percentage when compared to surrounding cities. This may be due to the lack of availability of housing units that is affordable with a voucher, or that landlords within the city that are unaware of the requirement to accept vouchers. Program Number 11 was modified to provide regular training to landlords on requirements under fair housing law. The program also has objectives that will expand and preserve the supply of affordable housing and assist the Imperial Valley Housing Authority with compliance to Government Codes 65863.10, 65863.11, and 65863.13.

While RECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. Equal attention must be given to the other end of the segregation continuum, affluent white neighborhoods or RCAAs. is defined as a census tract in which 80 percent or more of the population is white and has a median annual income greater than \$125,000. According to the AFFH Data Viewer, 9.2% of the population is white with a Median annual income of \$34,444. Therefore, there are no areas of Westmorland that qualify as a RCAA, which is also reflected in the AFFH Data Viewer.

Access to Opportunities

A key goal of this Housing Element is to facilitate improved access to opportunity for all Westmorland residents. The city seeks to promote an integrated pattern of development that connects residents to resources such as transit, educational facilities, and employment centers.

The City will place a priority to developing the central area of the City. This area is the downtown zone which is the heart of Westmorland where all the commercial developments are located. There are vacant parcels within walking distance. These areas are prime for affordable housing since they are less than a quarter mile from nearby grocery stores and have direct access to bus routes located in the downtown zone. While the zone has a lack of financial data, most of the oldest buildings in the City are in this zone and will therefore benefit the most from the City's rehabilitation and other assistance programs. The City will continuously communicate with developers and assist them with applications on a yearly basis.

The TCAC Opportunity Map aggregates a variety of indicators that measure economic mobility, environmental factors, and educational attainment domains. The CTCAC/HCD Opportunity Map provides a high-level assessment of resources available in an area and categorizes census tracts as Low Resource, Moderate Resource, or High Resource. Table 24 on the next page shows the domain scores for each of the City's census tracts. All of Westmorland is considered a Moderate Resource. Much of the County is considered Low Resource, as shown in the AFFH Data Viewer, but there are other areas of Moderate Resource in the area surrounding Holtville and in the western portion of El Centro.

Table 24 City of Westmorland Opportunity Map Scores

Census Block Group	Economic Score	Education Score	Environment Score
060250102002	17	31	31
060250102001	31	22	31

Source: 2023 CTCAC/HUD Opportunity Maps

Employment – Westmorland is primarily a bedroom community with a smattering of non-residential uses being located along the nearly one-mile stretch of Highway 86. As a result, only 15.8% of Westmorland's population live and work in Westmorland while the remaining 84.2% commute to other places, according to SCAG's Profile of the City of Westmorland. The primary employers in Westmorland are in the agricultural sector and education in the form of the Westmorland Union Elementary School District.

According to the March 2022 Benchmark Unemployment Rate and Labor Force Data prepared by the California Employment Development Department (EDD), Westmorland's unemployment rate is the second highest in the county at 20.3%. The highest in the county is Calexico with an unemployment rate of 23.9% while the county unemployment rate is 14.7%. While the unemployment rate is extremely high, it is important to note that the seasonal employment of farmworkers may play a significant role. There are approximately 48 different types of crops harvested during the summer, however, that number drops to 28 during the winter. Thus, the number of seasonal employees is drastically reduced during the winter. Program Number 16 was included to work with Campesinos Unidos, a local nonprofit, to develop a farmworker housing program. This program will allow the City to meet the future demand for farmworker housing.

Education

Education is an important guiding principle emphasized in the city's General Plan. The Westmorland Union Elementary School District (WUESD) provides kindergarten through 8th grade education for the residents of Westmorland. The only school in WUESD is Westmorland Elementary School which has a total of 355 students enrolled as of the 2021-2022 school year according to the California Department of Education. High School education is provided by the Brawley Union High School District (BUHSD) with Brawley High School located in the city of Brawley, approximately 11 miles east of Westmorland. School bus service is provided to students living in Westmorland and attending Brawley High School.

Of the population 25 years and over, 14.95 percent have no diploma and 54.2% have a high school degree or higher but only 4.6% have a bachelor's degree or higher. There were 262 people with less than a 9th grade education which accounts for 20.2% of the population 25 years and over, and 25.7% of the population have a high school education but no diploma, as shown on Table 25. The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide good access to opportunity for residents or, conversely, provide poor access to opportunity. Table 25 shows the education domain score for the west half of Westmorland as being 31. Census Block Group 060250102001 has a significantly lower score of 22 but it should be noted that this Block Group includes a much larger geographic area that extends more than 5 miles to the Salton Sea. When compared to other cities in the County of Imperial, the City of El Centro (central portion of the county), City of Calipatria, and the City of Calexico (southern portion of the county) have less of a positive education outcome. The cities of Imperial, Brawley, and Holtville have the most positive education outcome. This data may indicate that environmental factors hinder proficient educational opportunities.

Table 25 Educational Attainment

Population 25 years and over	Number	Percentage
Less than 9th grade	262	20.2%
9th to 12th grade, no diploma	333	25.7%
High school graduate (includes equivalency)	323	24.9%
Some college, no degree	236	18.2%
Associate's degree	84	6.5%
Bachelor's degree	53	4.1%
Graduate or professional degree	7	0.5%
High school graduate or higher	703	54.2%
Bachelor's degree or higher	60	4.6%
Population 25 years and over	1,298	

Source: US Census, American Community Survey

Environmental

In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version the CalEnviroScreen. This tool uses environmental, health, and socioeconomic indicators to map and compare a community's environmental scores. A community with a 75th percentile or above, is one with higher levels of pollution and other negative environmental indicators and is considered a disadvantaged community. According to CalEnviroScreen 4.0, Westmorland is within the 89th percentile which classifies the City as a disadvantaged community. Amongst the highest environmental indicators, Westmorland is in the 95th percentile for pesticides and impaired water bodies. As a corollary, there is a high incidence of asthma cases in Westmorland with its CalEnviroScreen score being in the 99th percentile. These figures are similar to the populated areas of the county which is within the 80-90th percentiles. There are areas in the 90th percentile in portions of Brawley, El Centro, and Calexico.

Imperial County's notoriously poor air quality is one of the most serious environmental issue facing Westmorland's residents. The National Health Institute of Environmental Health Sciences attributes a portion of the County's air quality to agricultural burns, diesel fumes, and automobile exhaust. While these are contributing factors to the poor air quality, the main issues come from the Salton Sea in the north which has high salinity and emits toxic fumes that is killing off its ecosystem, and the neighboring City of Mexicali to the south which is a highly industrialized metropolis with over one million residents. Even though the Imperial County Air Pollution District (ICAPCD) has regulations for local and industrial projects, the Salton Sea is overseen by the South Coast Air Quality Management District while the City of Mexicali is overseen by its own administration. Both districts have different regulations that are outside of the control of the ICAPCD. The City already requires developers of large projects to submit plans to ICAPCD for review, however, the City can inform residents about the air quality. The California Air Resources Board, in cooperation with ICAPCD and the United States Environmental Protection Agency, has set up a website to provide current conditions of air quality in the Imperial Valley. The website uses the Air Quality Index (AQI) to provide the air quality level for each day.

Transportation

All communities within the Imperial County are served by the Imperial Valley Transit (IVT) with a fixed route public bus service. Fixed routes operate over a set pattern of travel and with a published schedule. The fixed route provides a low cost, reliable, accessible, and comfortable way to travel. In several service areas, the fixed route bus can deviate from its normal route so that persons with disabilities and limited mobility are able to travel on the bus.

Route 2 is the only bus route that travels to and from Westmorland in a north-south direction along Center Street. There is one bus stop in each direction on Center Street at Highway 111. The first southbound bus arrives in Westmorland at approximately 6:22 A.M. and arrives at intervals of 2 hours 20 minutes with shorter interval during morning and afternoon peak hours. The bus brings Westmorland passengers to the neighboring city of Brawley within approximately 30 minutes. There are multiple job centers in Brawley, as well as a hospital, medical offices, and other commercial services not available in Westmorland. The bus route terminates in the city of El Centro which is the county seat and provides additional job centers. It takes approximately 1 hour and 30 minutes to reach El Centro. The last two northbound buses stop in Westmorland at 5:42 P.M. and 7:59 P.M. Mondays through Friday. Route 2 also stops at Imperial Valley College (IVC)

with the first stop arriving at IVC at 7:35 A.M. and the last bus that services Westmorland departs IVC at 7:10 P.M. There is another bus that departs IVC at 10:00 P.M. but does not travel further than Brawley.

The Imperial County Transportation Commission (ICTC) conducted a county wide survey as part of the Imperial County Regional Active Transportation Plan (Regional ATP) and found that most residents in Westmorland utilize personal vehicles instead of public transit. This is supported by the 2021 American Community Survey 5-Year Estimate as shown in Table 26. Approximately 82.6% of all workers, 16 years and over in households, drive to work alone and 2.8% carpooled while only 3.1% took public transportation.

Table 26 Means of Transportation to Work

Means of Transportation	Number	Percentage
For all workers, 16 years and over in households		
Drove Alone	499	82.6%
Carpooled	17	2.8%
Public Transportation	19	3.1%
Walked	35	5.8%
Worked from home	34	5.6%
Total	604	

Source: US Census, American Community Survey; 2021 ACS 5-Year Estimates Because of the high vehicle use in the City, there have been strides to improve local roadways utilized by the community. The City has improved the majority of roadways to include crossing sections and sidewalks for the public. There are currently only two major roadways that require a sidewalk on two specific portions (West and East 9th Street). The City is already applying for funding to incorporate these improvements. While the roadway and pedestrian facility improvements are beneficial for residents, the low educational score shown on Figure 29 may indicate the need for more transportation in this area. Given that the geographical location is primarily composed of multi-family developments and aging homes, the need for additional school transportation may be necessary. Program 22 will give greater consideration for the central areas of the City since those are the only areas that show a low educational score. The area will also be a focal point for other programs in this Housing Element.

Summary

Table 27 Summary of Access to Opportunity Indicators

Population Below Poverty Level	Westmorland	Imperial County
White Alone	40.1%	23.5%
Black or African American	0.6%	34.9%
American Indian and Alaskan Native Alone	0.0%	41.3%
Asian	0.5%	11.6%
Native Hawaiian and other Pacific Islander	0.0%	25.4%

Population Below Poverty Level	Westmorland	Imperial County
Hispanic or Latino Origin (of any race)	91.5%	25.7%
Other	No Data	20.0%
School Proficiency	Westmorland	Imperial County
Total Schools	1	69
Unemployment	Westmorland	Imperial County
Unemployment Rate		11.3%
Job Proximity	Westmorland	Imperial County
Less than 10 minutes		20.0%
10 to 14 minutes		19.1%
15 to 19 minutes		17.4%
20 to 24 minutes		11.9%
25 to 29 minutes		5.7%
30 to 34 minutes		9.6%
35 to 44 minutes		2.4%
45 to 59 minutes		5.8%
60 or more minutes		8.1%
Mean travel time to work (Minutes)	No Data	23.7
Transit	Westmorland	Imperial County
Transit trips per week within ½ mile	0	3
Jobs accessible in 30-minute trip	0	803
Commuters who use transit	0.00%	0.82%
CalEnviroScreen Percentile		
Census Tract	6	Percentile
6026010200		89

Disproportionate Housing Needs

Disproportionate housing needs occur when significant disparities exist in the proportion of members of a protected class experiencing a housing need compared to the proportion of individuals not in a protected class. The housing needs include cost burden, overcrowding, substandard housing, and displacement risk. Many of these housing needs can be assessed using data from the HUD Comprehensive Housing Affordability Strategy (CHAS), which uses American Community Survey data to analyze housing problems. The housing problems include housing cost burden, severe housing cost burden, overcrowding, and housing units with physical defects.

Housing Problems and Age of Housing Stock

According to the AFFH 2.0 Data Viewer, 73.4% of the total housing units in Westmorland were built prior to 1990. This indicates that a majority of the homes may be due for major repairs, but a windshield survey of housing conditions conducted in March 2023 shows that only 6.0% of the single-family homes appear to only require moderate repairs; 1.5% may require substantial repairs; and 2.5% appear to be dilapidated; while 90% appeared to be in sound condition or needing only minor repairs. The windshield survey was conducted using the sample housing conditions survey form provided by State Department of Housing and Community Development (HCD). The survey was conducted from public streets without entering private property. Each single-family housing was observed and scored based on the condition of the foundation, roofing, façade (paint, stucco, etc.), windows, and electrical. It is important to note that the results only reflect the exterior of the homes. Past housing rehabilitation programs have shown that some of these homes may be lacking adequate plumbing or a complete kitchen or other major interior issues despite appearing to be in good condition from the exterior. Program Number 10 involves the active search for funding for the City's rehabilitation program. The program guidelines will be updated to better assist the low- and very low-income households of the City while also improving the advertisement of the program. The program will also give special consideration to the central regions of the city since the area contains some of the oldest developments and are extremely likely to contain the most poverty. The goal of the program will be to ensure that at least half of the homes in need of rehabilitation are rehabilitated by 2025. This will ensure that all homes built prior to 1970 and most homes built between 1970 and 1980 receive the necessary modifications to ensure safe living conditions and a better quality of life.

Cost Burden

According to the U.S. Department of Housing and Urban Development (HUD), "affordable" housing is housing that costs no more than 30 percent of a household's monthly income. This housing cost, which includes rent and utilities, should be less than 30 percent of a household's monthly income to be considered affordable. If a household spends more than 30 percent of its monthly income on housing, the household is considered cost burdened. The AFFH 2.0 Data Viewer shows that 44.2% of the owner-occupied households in Westmorland are overpaying. Likewise, 44.2% of renter-occupied households are overpaying. This is compared to 37.5% for the County.

Program 2 will assist low- and moderate-income homeowners by providing training and supervision of self-help builders, loan packaging, and counseling households to build or rehabilitate their own homes. Program Numbers 3 and 4 will assist residents via the addition of a direct loan and guaranteed loan program. The City expects to cut the number of households overpaying for housing by at least half before the end of 2025.

Overcrowding

Recognizing that household overcrowding is not only measured by the number of people per household, persons per room is also used as a metric. Households which have an average of between one and 1.5 occupants per room are considered overcrowded, while households with greater than 1.5 occupants per room are considered severely overcrowded. Using these measures of overcrowding, the AFFH Data Viewer shows that 37 households (5.9%) in Westmorland were

overcrowded and 30 households (4.8%) were severely overcrowded. Due to these low numbers, no program is included to address overcrowding issues. Additionally, according to SCAG's Local Housing Data updated in 2021, 14 owner-occupied and 76 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. owner-occupied households and 26 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

Displacement Risk

The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the City can indicate an increased risk of displacement due to housing costs outpacing wage increase. This pattern is not only relevant to Westmorland but to the entire state as well. The AFFH Data Viewer shows that low-income and very low-income households are at risk of displacement primarily due to income levels and race/ethnic composition. Due to the City's small geographic size, there are no concentrations of higher displacement risk.

Data related to home values in Westmorland is very limited. While smaller cities in the Imperial County have seen increases as high 52 percent from \$147,000 to \$224,105 in the last five years, there has been minimal home sales in Westmorland to analyze trends. There is currently only one home listed for \$170,000 (848 square feet) at the Imperial County Association of Realtors website. This is in contrast to the neighboring city of Calipatria which has four homes ranging in price from \$170,000 (1,560 square feet) to \$290,000 (2,809 square feet). Based on this, it would appear that the per-square foot price of a home in Westmorland is significantly higher in Westmorland but one home is an insufficient data point to draw a meaningful analysis. A \$170,000 home is nevertheless affordable for residents earning the City's median income of \$33,444. Apartments, however, remain affordable with rates ranging from \$500 to just under \$700 but there are currently no vacant apartment units available.

Despite the lack of sales data, the City will encourage and incentivize the development of affordable housing units. The City incorporated Program Number 4 to work with the Imperial Valley Housing Authority on developing a program to assist and connect lower-income residents with affordable housing opportunities. The City hopes to implement the program by 2024.

Cost burden, overcrowding, and displacement risk are various factors that affect homelessness. Imperial County had a total of 1,527 people experiencing homelessness in 2020. The number grew 175.6% from the last count in 2015. This drastic increase is due to the inclusion of Slab City into their homelessness count from 2017 and on. Slab City is the largest homeless encampment in Imperial County. There were 1,071 individuals were counted in Slab City in 2017, which is approximately 70 percent of the 2020 count for Imperial County. Nearly half of the unsheltered population were chronically homeless, meaning that they are unsheltered for long periods of time. Many of the individuals in Slab city indicated that unstable employment and housing situations as the reason they began experiencing homelessness. With the low employment rate in Westmorland compared to the State, homelessness is an important issue even though Imperial County is one of the cheapest counties in California to live in. This indicates that more resources should be allocated to stabilizing employment as well as providing housing resources to people who earn incomes in the low and very low range. As discussed in the transportation and employment sections of this Housing Element, the residents of Westmorland are at a greater risk of displacement due to the lack of access to transportation to be able to connect with

employment centers. No areas of concentrations of homelessness or displacement have been identified due to the small geographic size of Westmorland.

Affirmatively Furthering Fair Housing (AFFH) and Analysis of Sites Inventory

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA, but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. The analysis must identify whether sites improve or exacerbate disparities in income, segregation, and all other components of fair housing. It is important to note that Westmorland's geographic size and isolation from other communities prevent concentration of various demographic components, as noted by the entire City and surrounding areas forming one Census Tract.

As discussed in other sections of this Housing Element, Westmorland is largely Hispanic. The site inventory does not concentrate sites in one particular area, but distributes them throughout the City. In addition, the City has a few sites that are located in areas where there is a higher concentration of low income individuals. There are no R/ECAP areas in Westmorland and thus the proposed sites will not concentrate poverty in one area of the City. Furthermore, development of single-family and other lower-density residential types are affordable to lower-income households, as evidenced through compiling Zillow for-sale and rental data.

As previously noted, there are no differences between neighborhoods within the City. Therefore, the City analyzes to the location of sites relative to services and amenities instead of comparing neighborhood to neighborhood. Imperial Valley Transit (IVT) operates two bus routes, 2 and 22, from the City's Main Street and Center Street stop. Route 2 connects Westmorland to other communities in Imperial Valley, including El Centro, Brawley, Calipatria, and Niland. Route 22 connects residents of Westmorland to Calipatria, Brawley and Niland. Both routes connect the City to Imperial Valley College, enabling access higher education opportunities. The Main Street and Center Street stop is located less than a 15 minute walk from the site identified to meet the lower-income RHNA.

The site, and more broadly, the entire City, is located within a $\frac{3}{4}$ mile of the standard IVT bus routes and therefore elderly individuals or individuals with a disability qualify for IVT Access. IVT Access provides curb-to-curb, shared ride services within a $\frac{1}{4}$ mile of the standard IVT bus routes. This provides a flexible option for eligible residents to access transportation services. The site is also located $\frac{1}{4}$ mile from Highway 78/86, providing access to transportation. Lastly, the site is located $\frac{1}{2}$ mile away from the Westmorland Senior Center and grocery stores in the City.

Access to Opportunity

All of Westmorland is considered a Moderate Resource Area according to the TCAC Opportunity Areas composite score. Thus, all sites identified in the inventory are located in low resource areas, are not disproportionately located in these areas in the context of the resource level of the City as a whole. However, the northern and eastern portions of the City have a higher regional

opportunity index. Additionally, most of the sites identified fall within SCAG's 2045 High Quality Transit area which will allow the City to take advantage of future assets within these areas and increase access to opportunity within and outside of the City.

Assessment of Local Contributing Factors to Fair Housing

The analysis conducted in this section regarding fair housing issues within the incorporated boundaries of the City of Westmorland has identified several local contributing factors. These contributing factors were identified using trends seen across the region and State, broken down to the local level. In Westmorland's case, there is a lack of investment with little available funding for the Imperial Valley region going to other, larger communities in the Imperial Valley. Therefore, the contributing factors identified in the table below represent themes consistent with other communities in the region.

The City has committed to a variety of programs with meaningful actions to combat contributing factors to fair housing. For example, to assist with lessening the cost burden in the City, Programs 2 (No Net Loss), 3 (Facilitate and Encourage the Development of a Variety of Housing), 4 (Imperial Valley Housing Authority Rental Assistance for Cost Burdened Lower Income Households), and 13 (Pursue Grant Funding for Affordable Housing) all commit to either ensuring new development opportunities exist within the City or seek to provide assistance to existing households facing cost burden issues. To combat pollution burden in the City, Program 12 (Energy Conservation and Weatherization) commits to assisting participants to conduct a variety of home repairs, including assistance with weatherstripping, air conditioner replacement, and other energy-efficient projects. Lastly, Programs 6 (Developmentally Disabled Outreach) and 11 (Fair Housing Services) commit to assisting to bridge the gap between available and needed services by implementing an outreach program of resources to assist families that include persons with disabilities. As part of this outreach, information is gathered on needed resources.

The following conclusions have been recognized as the most pressing issues in Westmorland:

AFH Identified Fair Housing Issues	Contributing Factors	Priority	Meaningful Actions
Cost Burden	Lack of quality affordable housing Need for additional access to rental assistance programs	High	Program 2 Program 3 Program 4 Program 13
Pollution Burden	Nearby agricultural activity Automotive exhaust and fumes Nearby industrial activity	Medium	Program 12
Barriers to Housing for Persons with Disabilities	Higher degree of population with a disability Gap between available and needed services	Medium	Program 6 Program 11

Local Data and Knowledge and Other Relevant Factors

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

In Westmorland, development originated as part of a 30,000-acre land plot by the Oakley Company, resulting in the development of a Post Office in 1909 and connection to the Southern Pacific Railroad in 1917. Further investments in the area, such as the extension of State Route 78 through Westmorland has resulted in development patterns centered around Main Street, with residences surrounding Main Street. Other relevant factors that may be contributing to fair housing issues are existing land use and zoning regulation and policies. As part of the housing element, the City will review current zoning and land use policies to identify any constraints and take appropriate steps to remove any identified constraints.

Additionally, a lack of economic investment is also an impediment to fair housing and housing opportunities. As previously noted, 84% of residents travel outside the City for employment. Programs 3 (Facilitate and Encourage the Development of a Variety of Housing) and 13 (Pursue Grant Funding for Affordable Housing) commit the City to working with developers to help fund future residential developments.

5. Sites Inventory

The 6th Cycle Regional Housing Needs Allocation (RHNA) Plan prepared by the Southern California Association of Governments (SCAG) identified a total 33 new housing units to be created in Westmorland during the 2021-2029 planning period as show in Table 28.

Table 28 Westmorland's 6th Cycle Regional Housing Needs Allocation

Income Category	Number of Units
Very Low Income ¹	8
Low Income	6
Moderate Income	4
Above-Moderate Income	15
Total	33

Source: Southern California Association of Governments (SCAG)

¹ It is assumed that 50 percent of the very low income RHNA is allocated towards extremely low income.

Sites to Accommodate the RHNA

As shown in Table 28, Westmorland's RHNA allocation for the 6th Cycle Housing Element is 33 units. Of those 8 units are for very low-income households, 6 housing units for low-income households, 4 units for moderate income households and 15 for above moderate- income households. Table 29, Vacant Sites Inventory shows the available sites currently zoned to accommodate the RHNA. While all of the City's RHNA can be accommodated on one site (APN 035-250-021) the City has also inventoried other parcels where residential could be developed. Additionally, to ensure lower income units are not over concentrated, and to assist with meeting the goals of affirmatively furthering fair housing, the City has taken a mixed income approach on APN 035-250-021 and assumed lower, moderate, and above moderate income units on that site.

The inclusion of additional capacity beyond meeting the RHNA assists with meeting the goals of affirmatively furthering fair housing (AFFH).

Realistic Capacity

In determining the realistic capacity for the inventory of sites, the City considered land use controls and site improvements, which included sidewalks, utility easements, and infrastructure improvements (roadway access, water, sewer, and stormwater) and looked at neighboring jurisdictions for typical densities since the City of Westmorland has not had recent multifamily residential development. The neighboring City of Brawley has recent projects that the City considered. Drawing from Brawley's housing element, a 2022 affordable housing project in Brawley developing at 15 dwelling units per acre in the R-3 (Residential Medium Density) zone, which allows 17 dwelling units per acre, at 88 percent of the maximum allowable density for the zone.

After these considerations, the city assumed a conservative 70 percent adjustment on R-1 and R-2 sites and R-4 zoned sites. This percentages have been applied to the sites listed in Table 29.

Table 29 Vacant Sites Inventory

Site Address/Intersection	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Total Capacity	Realistic Capacity	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity
435 I Street	035-241-028	Low Density Residential	R-1	5	0.15	0.75	1			1
445 I Street	035-241-027	Low Density Residential	R-1	5	0.15	0.75	1			1
462 I Street	035-242-016	Low Density Residential	R-1	5	0.15	0.75	1			1
454 I Street	035-242-020	Low Density Residential	R-1	5	0.15	0.75	1			1
483 H Street	035-242-003	Low Density Residential	R-1	5	0.15	0.75	1			1
463 H Street	035-242-004	Low Density Residential	R-1	5	0.15	0.75	1			1
455 H Street	035-242-005	Low Density Residential	R-1	5	0.15	0.75	1			1
447 H Street	035-242-024	Low Density Residential	R-1	5	0.15	0.75	1			1
439 H Street	035-242-025	Low Density Residential	R-1	5	0.15	0.75	1			1
SWC 7th & F	035-292-016	Low Density Residential	R-1	5	0.19	0.95	1			1
SWC 7th & F	035-292-017	Low Density Residential	R-1	5	0.19	0.95	1			1
215 N. Center Street	035-283-012	Med Density Residential	R-2	10	0.18	1.8	1		1	
215 N. Center Street	035-283-014	Med Density Residential	R-2	10	0.3	3	2		2	
NWC B & Main Street	035-323-005	Low Density Residential	R-1	5	0.23	1.15	1			1
3rd St. between Center & D	035-371-025	Med Density Residential	R-2	10	0.33	3.3	2		2	2
3rd St. between Center & D	035-371-026	Med Density Residential	R-2	10	0.33	3.3	2			2
195 3rd Street	035-383-013	Med Density Residential	R-2	10	0.17	1.7	1		1	
154 3rd Street	035-383-015	Med Density Residential	R-2	10	0.25	2.5	2		2	
Martin Road	035-250-021	High Density Residential	R-4	30	7.15	214.5	150	150		
Total Capacity						253	170	150	8	16

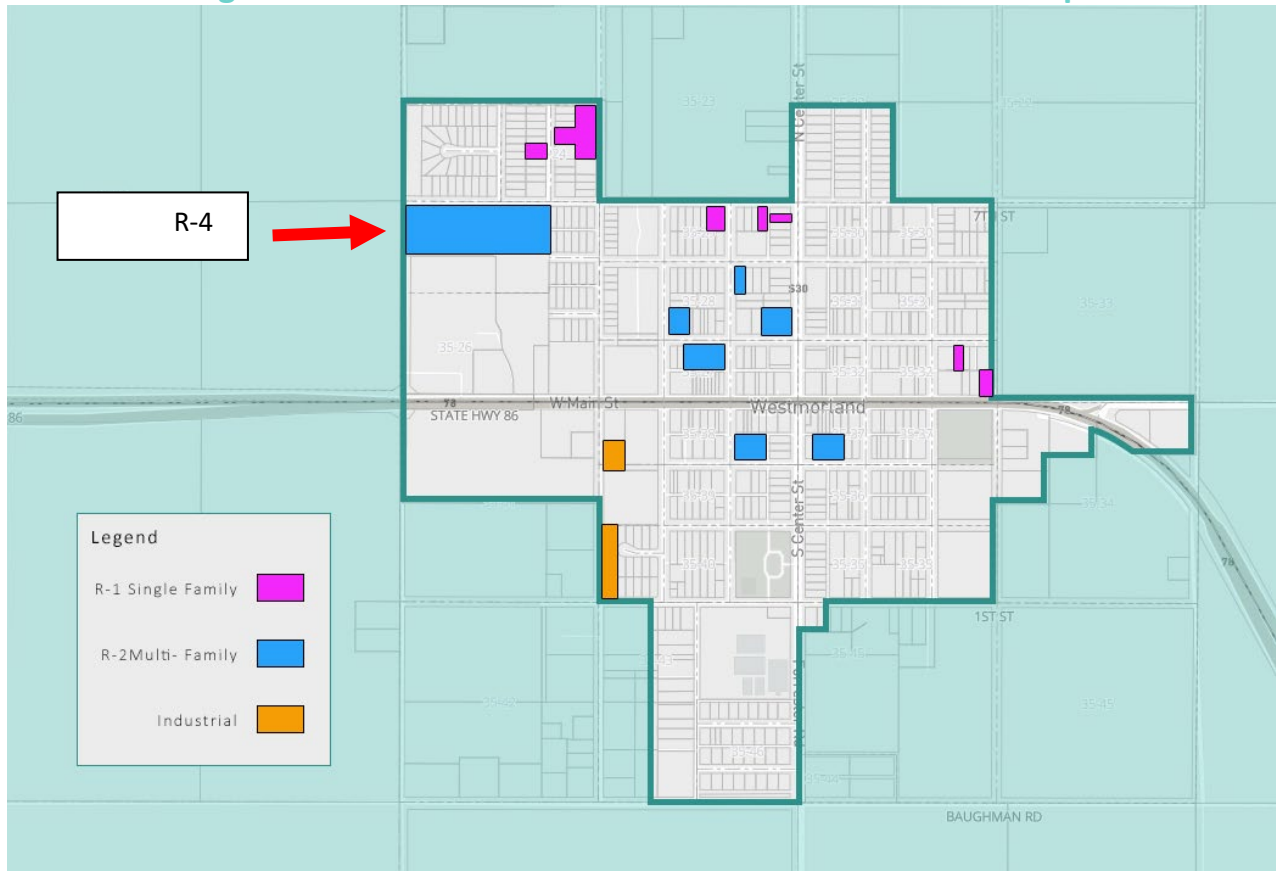
Source: City of Westmorland, 2024.

Notes: None of the sites in the inventory were identified in previous planning periods to meet the lower income RHNA.

The sites included do not have any environmental constraints or constraints related to contaminants, easements, site shape or size, compatibility with designated uses, or other physical conditions that would constrain development. Further, all sites have sufficient capacity for sewer, water, and dry utilities.

Figure 6 shows the vacant parcels within the City that are available for residential development. These sites are a mix of R-1, R-2, and R-3 zoned sites ranging in size from approximately 6,000 to 9,000 square feet and ranging in density from 5 to 30 units per acre.

Figure 6: Vacant Parcels Available for Residential Development



Ability to meet the City's share of the regional housing need

Table 30 compares the City's RHNA to the site's inventory capacity. The City has adequate capacity on vacant sites to meet the RHNA and has a surplus of 140 units. While the City is not relying on ADUs to meet RHNA, the City has included quantified objectives for this type of housing type which by design could provide an affordable option for the community.

Table 30 Summary of Residential Capacity Compared to the 6th Cycle RHNA

Income Category	RHNA	Vacant Site Capacity	Surplus
Very Low ¹	8	150	136
Low	6		
Moderate	4	8	4
Above Moderate	15	16	1
Total	33	173	140

Source: City of Westmorland, 2024.

Availability of Infrastructure

The City of Westmorland operates its own water and wastewater systems. All parcels (vacant or otherwise) within the incorporated city limits of Westmorland are served by an interconnected network of water and wastewater infrastructure. The Wastewater Treatment Plant located at the northeast corner of Howenstein and Martin Roads and uses an oxidation ditch-type process. The present plant has a design flow capacity of 4.30 million gallons per day (MGD) with a current usage of 2.0 MGD. The City also owns and operates its own potable water treatment and distribution system with a current capacity of 3.15 million gallons per day (MGD). The water treatment plant is currently operating at 45% capacity.

The City's treatment plants and infrastructure systems have sufficient capacity for both services to accommodate another 600 dwelling units (~3,000 persons), well exceeding the need for the 6th cycle RHNA.

Environmental Constraints

None of the properties identified in the residential sites inventory are known to be constrained by any environmental constraints such as steep slopes, floodplains, or the existence of known hazardous materials. The sites identified to accommodate Westmorland's share of the regional housing need are vacant but not in agricultural production. There are no Williamson Act contracts constraining the development of the residential sites located within the City limits which would impact agricultural resources.

With respect to biological resources, the City of Westmorland does not contain forests, harbors, wildlife, or natural water resources. The primary species of concern is the burrowing owl which is protected under the Migratory Bird Treaty Act but these are typically found in non-urbanized

areas so these would not constitute an environmental constraint to the production of housing in Westmorland.

The City of Westmorland is not within an Earthquake Fault Zone as established by the Alquist-Priolo Earthquake Zoning Act; however other areas in Imperial County are within fault zones. Imperial Valley includes a series of parallel transform faults including major faults such as the San Andreas, San Jacinto, and Ellsinore zones. The San Jacinto fault system is the most seismically active fault system in Imperial Valley and is located to the west of Westmorland. As such, this does not constitute an environmental constraint.

Zoning for a Variety of Housing Types

Government Code Section 65583 and 65583.2 require the housing element 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. Refer to Section 3, Housing Constraints, for how the city allows these use types.

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.

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. CalHFA 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)

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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.

6. Accomplishments Under The 2013-2021 Housing Element

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.

Appropriateness Of Goals, Objectives and Policies

The 2013-2021 Housing Element included a total of 14 Housing Programs to address the availability of adequate housing sites, the creation of affordable housing, to remove governmental constraints, improve housing conditions, promote fair housing, preserve at-risk housing, and promote energy conservation. Table 6-1 illustrates that all 14 Housing Programs from the 2013-2021 Housing Element and summarizes the accomplishments during that time period. A majority of the previous Housing Programs were appropriate and the City will continue those Programs during the 6th Cycle.

EFFECTIVENESS OF THE 2013-2021 HOUSING ELEMENT

The City's share of regional housing need for the prior projection period was 156 housing units. Between 2013 and January 2021, one housing unit was constructed. Table 31 shows the quantified objectives of the 5th Cycle Housing Element. All of the previous objectives were met with regards to the adoption of certain policies and the dissemination of information, but none of the quantified objectives were met, except for the rehabilitation of 8 housing units.

Table 31 Quantified Objectives (2013-2021 Housing Element)

Category	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above-Moderate Income	Total
Construction	4	5	6	36	105	156
Rehabilitation	6	30	14			50
Conservation	45	32	3			80
Preservation	89	66				194

Source: City of Westmorland

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. 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 for Housing for Special Needs

California Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs. Special needs populations include farmworkers, large families, female-headed single parent households, people experiencing homelessness, persons with disabilities, seniors, households with extremely low incomes. The City made a diligent, consistent effort to achieve its housing goals that address special housing needs through the implementation of policies and programs from the 5th cycle Housing Element. The following bulleted list and associated headings summarize the effectiveness of the programs for special housing needs:

- In collaboration with the San Diego Regional Center (SDRC), the City prepared a brochure and made available at City Hall. The City continues to assist SDRC with identifying available funding sources.
- The City has adopted the 2019 California Building Code Title 24 to comply with the requirements of the Americans with Disabilities Act (ADA) and State law in the previous planning period.
- Amendments based on the zoning programs included the prior 2013-2021 Housing Element, the City in February 2016 adopted Zoning Ordinance Amendments that address California law mandates. These include up-to-date zoning provisions for:
 - Transitional Housing: to comply with Government Code Section 65582(f) and Government Code Section 65583(a)(5);

- Emergency shelters: to comply with Government Code 65582 (d), Section 65583(a)(4), and Government Code Section 65583(c)(1);
- 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); and
- Zoning Ordinance Definitions (e.g., family, disability, etc.).

Housing Funding

Various programs 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.

Fair Housing/Equal Housing Opportunity

Various 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.

Energy Conservation

One Housing Program is related to energy conservation. The program 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 the 2013- 2021 Housing Element: Additional energy conservation opportunities are described herein. Coordination with Developers and Streamlined Processing

A number of Housing 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. Sites Availability There were programs involved in 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-4 to permit the development of 100 housing units.

Housing Quality Other 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.

The City assisted with the rehabilitation of 8 housing units during the planning period and continued to work with Imperial Valley Housing Authority to facilitate its efforts to rehabilitate multi-family housing units.

Other Programs More programs involved actions to inform the community about housing issues, intergovernmental coordination, and other miscellaneous activities. The following programs are carried forwarded 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.

The city has not adopted moratoria or other prohibitions that would impede the development of any type of housing including multi-family homes and affordable housing. The City also has not adopted any growth control measures. The urban growth boundaries coincide with the official Sphere of Influence (SOI).

Table 32 Program by Program Analysis of 2013-2021 Housing Programs

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
1. Land Use Element/Project Implementation This Program ensures that the City has sufficient sites to accommodate its share of the regional housing for the above-moderate- and moderate-income groups. Objective: The above-moderate income housing need is accommodated by four vacant R-1 zoned sites that have a combined capacity of 300 housing units. The moderate-income housing need is accommodated by one vacant R-4 site that has a capacity of 100 housing units. Timeframe: 2013-2021 Responsible Entity: Planning Department Accomplishment: The City was able to maintain the site and the sites continue to be available for moderate and above-moderate income housing development	Modify
2. No Net Loss Program The No Net Loss Program implements Government Code Section 65863 and is modeled after a program description prepared by CD. The purpose of the program is to ensure that the sites identified in the 2013-2021 Housing Element continue to accommodate the City's share of the regional housing need throughout the planning period. The following activities comprise the program: Objective: Monitor annually the sites inventory to determine the amount, type and size of development on the sites identified in the 2013-2021 Housing Element. Develop and implement a formal ongoing (project-by-project, parcel-by-parcel) evaluation procedure pursuant to Government Code Section 65863. Annually report on the number of housing units constructed by income group. Update the vacant and underutilized parcels inventory to assist developers in identifying land suitable for residential development. In the event that a site is approved for development of a use or density other than that described in the 2013-2021 Housing Element, the City will identify sufficient additional, adequate, and available sites with an equal or greater residential density so that there is no net loss of residential unit capacity. Timeframe: 2013-2021	Continue

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
Responsible Entity: Planning Department Accomplishment: The City continued to update the vacant parcel inventory list and continues to monitor the list.	
3. Facilitate and Encourage the Development of a Variety of Types of Housing The City Council will approve Zoning Ordinance Amendments which meet the requirements of Government Code Section 65583(c)(1). The City will continue to implement the zoning provisions for encouraging a variety of housing types. Objective: The City will encourage the developers to include a mix of housing unit sizes (e.g., SROs, 1-, 2-and 3-bedroom units) in new residential communities. To encourage the development of a variety of housing types and a housing mix the City will prepare prototypical plans and disseminate these plans to developers, including affordable housing developers. Among these developers will be the Imperial Valley Housing Authority (IVHA) and developers who have developed affordable housing in Imperial County with the assistance of State HOME funds, low-income housing tax credits as well as those who have competed for funding from the Strategic Growth Council's Affordable Housing and Sustainable Communities Program. Timeframe: 2013-2021 Responsible Entity: Planning Department Accomplishment: The City met with potential developers through the 2013-2021 planning period and encouraged them to build a variety of housing types in Westmorland. Unfortunately, no development occurred during the 5th Cycle.	Continue
4. Imperial Valley Housing Authority Rental Assistance for Cost Burdened Lower Income Households The Imperial Valley Housing Authority (IVHA) administers two programs which address the rental assistance needs of extremely low and very low-income families. The IVHA operates 62 public housing units in a combination of housing types. In addition, it provides Section 8 rental assistance to 18 families through the Section 8 Housing Choice Voucher Program. During the planning period, the City anticipates that the IVHA will continue to implement these two very important rental assistance programs. The assisted families pay 30% of their income toward monthly rent and, therefore, these programs reduce the number of cost burdened families. The City will continue to support the efforts of the IVHA to secure additional Section 8 Housing Choice Vouchers.	Continue

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
Objective: In cooperation with the IVHA, the City will conduct the following outreach efforts: Have available at City Hall the Housing Authority's Application for Housing Assistance in both English and Spanish. Housing assistance is available in public housing units, Section 8 tenant assistance, and mobile home park spaces. This outreach effort will be conducted throughout the planning period. Inform interested residents of the Housing Authority's priority of providing assistance to veterans and disabled persons. This outreach effort will be conducted throughout the planning period. Host at City Hall a workshop for landlords that may be interested in participating in the Housing Authority's rental assistance programs. This outreach effort will be completed when deemed appropriate by the IVHA. Timeframe: 2013-2021 Responsible Entity: Imperial Valley Housing Authority (IVHA) Accomplishment: The City continues to provide IVHA applications at City Hall and continues to inform interested residents of available programs. The City was not able to hold a workshop at City Hall.	
5. Density Bonus Incentives 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. Objectives: The City will continue to provide density bonus incentives to developers who plan to build a mix of housing affordable to very low and lower income families and market rate housing as well as qualified senior housing developments. In order to implement this program, the following outreach efforts will be completed: A brochure will be prepared to describe the density bonus incentives. The brochure will be prepared by the 1st quarter 2017. The brochure will be given to all parties interested in developing housing in the City of Westmorland. This outreach effort will be conducted throughout the planning period. The City will provide technical assistance to developers who are interested in submitting an application for density bonus units. This outreach effort will be conducted throughout the planning period. Timeframe: 2016-2021	Continue

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
Responsible Entity: Planning Department Accomplishment: The City was able to create a brochure and information packet regarding the Density Bonus Program which was provided to developers. No residential development occurred within the 5th Cycle.	
6. Developmentally Disabled Outreach Program Chapter 507, Statutes of 2010 (SB 812), which took effect January 2011, amended State housing element law to require the analysis of the disabled to include an evaluation of the special housing needs of persons with developmental disabilities. Objective: The City will work with the San Diego Regional Center to implement an outreach program that informs families within Westmorland on housing and services available for persons with developmental disabilities. The program will include the development of an informational brochure, including information on services on the City's website, and providing housing-related training for individuals/families through workshops. The City also will work with the San Diego Regional Center to identify funding sources that can address the housing needs of developmentally disabled persons. Timeframe: Mid-year 2017 Responsible Entity: City Clerk Accomplishment: Through collaboration with the San Diego Regional Center, a brochure was prepared and made available at City Hall. The City continues to work with the Center to identify funding sources. Information was included in the City website but a recent update inadvertently removed information. The City will once again make the information available on the website.	Continue
7. Extremely Low Income and Special Needs Housing Program There is considerable overlap among and between extremely low-income households and special needs populations. In Imperial County, the extremely low-income annual limits for one and two-person households are \$12,150 and \$15,930, respectively. State law specially recognizes specific special needs population including: elderly, frail elderly, disabled persons, developmentally disabled persons, large families, female householders and homeless persons and families. Objective: 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	Continue

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
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 and impact fees for affordable housing. • Modify certain development standards to promote affordable housing development. Timeframe: Mid-year 2017 Responsible Entity: City Clerk and Planning Department Accomplishment: The City instituted a policy to defer development and impact fees for affordable housing. The policy allows affordable housing projects to defer payment of impact fees to the issuance of a Certificate of Occupancy rather than at the issuance of building permit. The Density Bonus Program allows for deviation from certain development standards to encourage the development of ELI and Special Housing Needs.	
8. Zoning Ordinance Amendments Program The City will adopt Zoning Ordinance Amendments concurrently with adoption of the 2013-2021 Housing Element to comply with State law. Objective: The City will address all new State mandated zoning requirements in a timely manner. The City will continue to monitor the HCD website for Memoranda and Technical Assistance papers related to Housing mandates. Timeframe: 2016-2021 Responsible Entity: Planning Department Accomplishment: The City adopted various Zoning Ordinance Amendments outlined in the 5th Cycle Housing Element. The City was not able to keep up with recent revisions to State Law, including the ADU requirements but the City has allowed the development ADUs and JADUs based on State requirements.	Modify
9. Building Code Amendments Program The purpose of this program is to timely address all new State mandated building code requirements that may be enacted between adoption of the 2013-2021 Housing Element (mid-year 2015) and the end of the current planning period (October 2021).	Delete

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
Objective: The California Building Standards Code Title 24 serves as the basis for the design and construction of buildings in California. California's building codes are published in their entirety every three years. Intervening Code Adoption Cycles produce Supplement pages half-way (18 months) into each triennial period. Amendments to California's building standards are subject to a lengthy and transparent public participation process throughout each code adoption cycle. Timeframe: 2016 Responsible Entity: Building Official Accomplishment: The City adopted 2016 Building Code as identified in the previous Housing Element. The City also adopted the next triennial updates without any revisions.	
10. Housing Code Enforcement The City Council adopted the 2013 Residential Building Code which authorizes the City to abate unsafe buildings pursuant to State Housing Law, Mobile home Parks Act, Employee Housing Act, and Factory-Built Housing Law Objective: Enforcement of building codes ensures that homes are maintained so that they do not deteriorate and become dilapidated. Timeframe: 2013-2021 Responsible Entity: Building Official Accomplishment: The City continues to actively enforce the City's building code and zoning code with regards to maintenance of housing units.	Continue
11. Housing Rehabilitation Program The City will apply for funding that may be available to help fund the rehabilitation of single-family homes. The City also will work with the Imperial Valley Housing Authority to facilitate its efforts to rehabilitate multi-family housing units. Objective: The Housing Rehabilitation Program allows the City to assist income-qualified homeowners to rehabilitate their homes. Timeframe: 2013-2021 Responsible Entity: Building Official	Continue

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
Accomplishment: The City was able to rehabilitate 8 housing units during the previous Housing Element cycle.	
12. Fair Housing Information Program The City will continue to provide residents with fair housing information by posting links to various local, state, and federal resources. Objective: Providing readily accessible information regarding Fair Housing allows residents to be aware of housing laws and provides a link to the Mediation Board. Timeframe: 2016 Responsible Entity: City Clerk Accomplishment: Links were included in the City website but a recent update inadvertently removed information. The City will once again make the information available on the website.	Delete
13. Fair Housing Services Program As the City is not a CDBG entitlement jurisdiction, it has no funding to retain the services of a fair housing provider but fair housing is a priority goal for Westmorland. Objective: The Inland Fair Housing and Mediation Board is a resource that is available to residents of Westmorland and Imperial County. Timeframe: 2013-2021 Responsible Entity: City Clerk and City Staff Accomplishment: The City continues to refer residents with fair housing and landlord/tenant issues to Inland's office which is located at 444 South 8th Street, Suite C1A El Centro, CA 92243.	Continue
14 Energy Conservation in New Residential Construction Title 24, Part 6 of the California Building Code regulates energy uses including space heating and cooling, hot water heating, and ventilation. This City will ensure that all new residential developments will meet and if possible, exceed Title 24 standards. Objective: Energy efficiency in homes helps homeowner save costs for homeowners, especially during summer months when energy bills increase due to the need to cool the home in our desert environment. On	Modify

2013-2021 Programs and Accomplishments	Continue, Modify, or Delete
average, energy efficiency in residential construction can increase the cost by \$2,290 but will return more than \$6,200 in energy saving over 30 years. Timeframe: 2015-2021 Responsible Entity: Building Official Accomplishment: The adopted all recent updates of the California Code which has progressively required more and more energy efficiency. Unfortunately, no new homes have been built during this past Housing Element cycle.	

7. Housing Program

Government Code Section 65583(c) requires Housing Elements to include housing programs that sets forth a schedule of actions during the 2021-2029 planning period. Each of the programs must include a timeline for implementation to achieve the goals and objectives of the housing element. The programs must identify actions that will be taken to make sites available to accommodate the portion of the city's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory. Programs must also assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households. Programs must also be included to address and remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing.

1. Land Use Element Implementation

The City is required to create a total of 33 new dwelling units as follows: 8 for very low income households, 6 for low income households, 4 for moderate income households, and 15 for above moderate income households. The previous housing element did not identify any sites to accommodate the lower income housing needs, but a vacant site does exist which is appropriately zoned for multi-family and therefore sufficient to meet the needs of the lower income groups.

This Program ensures that the City has sufficient sites to accommodate its share of the regional housing for all income groups and is continued from the 5th Cycle Housing Element.

City's Specific Role: The City shall encourage and enforce the objectives and purpose of the R-4 zoning district with regards to the 7.13-acre site at APN 035-250-021.

Objective: The subdivision of APN 035-250-021 shall include sufficient parcels to accommodate one parcel for the development of 14 apartment units, 4 smaller lots to accommodate smaller homes for moderate-income households and 15 single-family parcels.

Timeframe: Ongoing, 2021-2029

Responsible Entity: Planning Department

2. No Net Loss Program

The No Net Loss Program implements Government Code Section 65863 and is modeled after a program description prepared by CD. The purpose of the program is to ensure that the sites identified in the 2021-2029 Housing Element continue to accommodate the City's share of the regional housing need throughout the planning period. The following activities comprise the program:

City's Specific Role: The City will continue implement a formal, ongoing (project-by-project, parcel-by-parcel) evaluation procedure pursuant to Government Code Section 65863. In the event that a site is approved for development of a use or density other than that described in this Housing Element, the City will identify sufficient additional, adequate, and available sites with an equal or greater residential density so that there is no net loss of residential unit capacity.

Objective: The City will monitor annually the sites inventory to determine the amount, type and size of development on the sites identified in the this Housing Element. Staff will report to the Council the number of housing units constructed by income group. Vacant and underutilized parcels inventory will be continually updated to assist developers in identifying land suitable for residential development.

Timeframe: Ongoing, 2021-2029

Responsible Entity: Planning Department

3. Facilitate and Encourage the Development of a Variety of Housing

City's Specific Role: The City will continue to implement the zoning provisions for encouraging a variety of housing types.

Objective: The City will encourage the developers to include a mix of housing unit sizes (e.g., SROs, 1-, 2-and 3-bedroom units) in new residential communities. To encourage the development of a variety of housing types and a housing mix the City will prepare prototypical plans and disseminate these plans to developers, including affordable housing developers. Among these developers will be the Imperial Valley Housing Authority (IVHA) and developers who have developed affordable housing in Imperial County with the assistance of State HOME funds, low-income housing tax credits as well as those who have competed for funding from the Strategic Growth Council's Affordable Housing and Sustainable Communities Program.

Timeframe: Ongoing, 2021-2029. Prototypical plans should be completed by the end of 2024 and should be posted on the City's website. The City should also conduct annual outreach to ensure that potential developers are aware of the City's programs.

Responsible Entity: Planning Department

Geographic Targeting and Quantified Objective: 20 units throughout the City

4. Imperial Valley Housing Authority Rental Assistance for Cost Burdened Lower Income Households

City's Specific Role: The Imperial Valley Housing Authority (IVHA) administers two programs which address the rental assistance needs of extremely low and very low-income families. The IVHA operates 62 public housing units in a combination of housing types. In addition, it provides Section 8 rental assistance to 18 families through the Section 8 Housing Choice Voucher Program.

During the planning period, the City anticipates that the IVHA will continue to implement these two very important rental assistance programs. The assisted families pay 30% of their income toward monthly rent and, therefore, these programs reduce the number of cost burdened families. The City will continue to support the efforts of the IVHA to secure additional Section 8 Housing Choice Vouchers.

Objective: In cooperation with the IVHA, the City will conduct the following outreach efforts: Have available at City Hall the Housing Authority's Application for Housing Assistance in both English and Spanish. Housing assistance is available in public housing units, Section 8 tenant assistance, and mobile home park spaces. This outreach effort will be conducted throughout the planning period.

Inform interested residents of the Housing Authority's priority of providing assistance to veterans and disabled persons. This outreach effort will be conducted throughout the planning period.

Host at City Hall a workshop for landlords that may be interested in participating in the Housing Authority's rental assistance programs. This outreach effort will be completed at least annually in conjunction with the IVHA.

Timeframe: Annually, 2021-2029

Responsible Entity: Imperial Valley Housing Authority (IVHA) and City Staff

Geographic Targeting: Throughout the City.

5. Density Bonus Incentives

City's Specific Role: 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.

Objectives: The City will continue to provide density bonus incentives to developers who plan to build a mix of housing affordable to very low and lower income families and market rate housing as well as qualified senior housing developments.

In order to implement this program, the following outreach efforts will be completed:

The Density Bonus brochure will be given to all parties interested in developing housing in the City of Westmorland. This outreach effort will be conducted throughout the planning period. The City will provide technical assistance to developers who are interested in submitting an application for density bonus units. This outreach effort will be conducted throughout the planning period.

Timeframe: Ongoing, 2021-2029

Responsible Entity: Planning Department

6. Developmentally Disabled Outreach Program

Objective: The City will continue to work with the San Diego Regional Center (SDRC) to implement an outreach program that informs families within Westmorland on housing and services available for persons with developmental disabilities. Coordination with the SDRC will occur at least annually. The City will also continue work with the San Diego Regional Center to, at least annually identify funding sources that can address the housing needs of developmentally disabled persons.

Timeframe: Annually, 2021-2029

Responsible Entity: City Clerk

7. Extremely Low Income and Special Need Housing Program

There is considerable overlap among and between extremely low-income households and special needs populations. In Imperial County, the extremely low-income annual limits for one and two-person households are \$12,150 and \$15,930, respectively. State law specially recognizes specific special needs population including: elderly, frail elderly, disabled persons, developmentally disabled persons, large families, female householders and homeless persons and families.

City's Specific Role: 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 (including very low-, low-, and moderate-income), 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:

Objective: The City will provide regulatory incentives to developers who agree to include a portion of their units affordable to special needs households, including ELI households. Help to facilitate development of five ELI units through the following actions.

- Annually, seek funding from State sources in coordination with affordable developers.
- Defer development and impact fees for affordable housing as projects are processed.
- Modify certain development standards to promote affordable housing development.

- Assist in the development of 10 units for special housing needs groups throughout the planning period.
- Encourage the development of Single-Room Occupancy (SRO) Units, transitional and supportive housing, and other special housing arrangements.

Timeframe: Annual coordination with developers and encourage the development of SROs annually and as projects are submitted to the Planning Department., 2021-2029.

Responsible Entity: City Clerk and Planning Department

Geographic Targeting: Throughout the City

8. Zoning Ordinance Amendments to Address State Mandated Requirements

The City will update its Zoning Ordinance to reduce the number of zoning requirements In order to encourage the production of accessory dwelling units. Some of the changes are the reduction of parking requirements, reduction of permit processing time, increase in floor areas, and reduction of setbacks, and promote second units in subdivision development by considering/creating incentives for their production.

City's Specific Role: The City will adopt Zoning Ordinance Amendments concurrently with adoption of the 6th Cycle Housing Element to comply with State law.

Objectives:

1. The City will review and revise the ADU ordinance to ensure compliance with State law, , identify incentives for construction of ADUs including but not limited to flexible zoning requirements, development standards, or processing and fee incentives, reduced parking requirements, pre-approved building plans, fee waivers, and create an information program to encourage homeowners to construct ADUs and JADUs that will include brochures and information on the City's website to market the development opportunities for ADU's. Facilitate the development of at least three ADUs within the planning period.
2. The City will revise the Zoning Ordinance to comply with Health and Safety Code Sections 17021.5 17021.6, and 17021.8.
3. The City will amend the Zoning Ordinance to broaden the definition of "family" and to ease the restrictions for large residential care homes.
4. The City will amend the Zoning Ordinance to allow residential care facilities of seven or more persons as a permitted use in all residential zones with objectives standards subject similar to other residential uses of the same type in the same zone.
5. The City will amend the Zoning Ordinance to allow emergency shelters by-right, without discretionary review in the R-4 zone, update the definition of "emergency shelters" to

include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care, and review and revise parking standards for emergency shelters to allow sufficient parking to accommodate all staff working in the emergency shelter, provided ensure standards do not require more parking for emergency shelters than for other residential or commercial uses in the same zone, in compliance with Government Code Section 65583 (a)(4).

6. The City will amend the Zoning Ordinance to permit low-barrier navigation centers—defined as low-barrier, temporary, service-enriched shelters to help homeless individuals and families quickly obtain permanent housing—by right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662; Assembly Bill [AB] 101).

Timeframe: Review and revise the zoning code by December 2025, modify the ADU ordinance within one year of receiving formal HCD comments. Work with developers to identify incentives by December 2025, implement thereafter. Will monitor the affordability of ADUs in the annual APRs.

Responsible Entity: Planning Department

Geographic Targeting and Quantified Objective: 10 units throughout the City.

9. Housing Code Enforcement

Code enforcement protects the public’s health, safety, welfare, and property value through the enforcement of adopted minimum standards. Given that some of the housing stock have one of four severe housing problems, it is vital for code enforcement to monitor older properties to ensure their preservation.

City’s Specific Role: The City’s role is to ensure the abatement of unsafe buildings.

Objective: The City will adopt updates to the California Building Code by December 31, 2025. The City will continue to ensure development standards are met, and inspect older properties for damage on a yearly basis. The City will also notify property owners of the City’s Housing Rehabilitation program and of any other potential resources that may be available to assist them in the elimination of any unsafe living conditions resulting from structural deterioration.

Timeframe: Update the California Building Code by December 31, 2025, Notify residents of rehabilitation opportunities annually.

Responsible Entity: Building Official

10. Housing Rehabilitation Program

The City has previously used CDBG and HOME funds to address the local housing rehabilitation needs. The Housing Rehabilitation program consists of two components: deferred loans and amortized time pay loans for owner/occupants; and amortized time pay loans for owner/investors.

Rehabilitation assistance is only provided to owner/occupants and renters within the targeted income group (households earning up to 80 percent of County median). To qualify for assistance under the rental components of the Housing Rehabilitation program, the units must be within the incorporated city limits and may include mobile home units. The current guidelines are outdated and incorporate minimum limits for the Housing Rehabilitation program that might be restrictive for substantial rehabilitation or reconstruction projects. The guidelines should be amended to address current needs, including allowance of room additions to alleviate overcrowding.

City's Specific Role: The City will apply for funding that may be available to help fund the rehabilitation of single-family homes. The City also will work with the Imperial Valley Housing Authority to facilitate its efforts to rehabilitate multi-family housing units. In order to apprise the public of the rehabilitation program, the City will offer information brochures in English and Spanish and conducts education outreach through public meetings and door-to-door contact.

Objective: The Housing Rehabilitation Program allows the City to assist income-qualified homeowners to rehabilitate their homes. The City will apply annually to the HCD for CDBG and HOME funds through the state's funding cycle as Notices of Funding Availability are released. Applications will be for the entire City. The City will also improve its advertisement of the program in order to encourage more residents to utilize the program. The goal will be to eliminate half of the households with one of the four housing problems by 2025 and eliminate all households with one of the four housing problems by 2029. The Program will assist in the rehabilitation of up to three homes per year.

Timeframe: Ongoing, 2021-2029

Responsible Entity: Planning Department

Geographic Targeting: Throughout the City

11. Fair Housing Services Program

The California Rural Legal Assistance (CRLA) organization in El Centro provides arbitration for private housing disputes for extremely low- and low-income households in Imperial County. The CRLA is funded through the Federal Legal Services Corporation and State IOLTA Trust Fund operated by the California Bar Association. The CRLA has established a Community Advisory Council with one member from each community; the community member must be low income and a former or present client of the CRLA. The Civil Rights Division of HUD also provides educational brochures and posters, answers questions, and investigates fair housing complaints.

City's Specific Role: The City will continue to disseminate information to the public regarding fair housing. Methods of dissemination include the city website and information brochures at City Hall.

Objective: The City will continue to refer fair housing complaints to the CRLA or the Civil Rights Division of HUD as appropriate. The City will also look to implement an informational campaign by June 2022 specifically targeting fair housing complaints within the City. The City will also continue to promote equal housing laws, housing programs, and resources through educational and marketing material attached to building permits, code violations, utility bills, City Hall, city

website and the public library. Input from low-income and households with disabilities will also be collected through cooperation with local nonprofits, interviews with stakeholders, and questionnaires. The data will be collected once every 4 years in order to gain an understanding of the needs of lower-income and special needs households. The data will also be utilized to update future iterations of the Housing Element.

Timeframe: Ongoing, 2021-2029

Responsible Entity: City Clerk and City Staff

12. Energy Conservation and Weatherization Program

Campesinos Unidos, a local nonprofit organization, is currently providing weatherization services to eligible participants in the city through two programs: 1) the Low-Income Home Energy Assistance Program, funded by the state; and 2) a weatherization program funded by Southern California Gas Company. The programs provide services including minor housing envelope repairs, ceiling insulation, low-flow showerheads, weatherstripping, water heater blankets and pipe wrap, duct wrap, caulking, and switch and outlet gaskets. The Imperial Irrigation District (IID) makes funds available for air conditioner replacement and energy-efficient projects.

City's Specific Role: The City will work with Campesinos Unidos, the IID, and other entities to disseminate information to the public regarding fair housing. Methods of dissemination include the city website and information brochures at City Hall.

Objective: The City will continue to refer fair housing complaints to the CRLA or the Civil Rights Division of HUD as appropriate. The City will also look to implement an informational campaign by June 2022 specifically targeting fair housing complaints within the City. The City will also continue to promote equal housing laws, housing programs, and resources through educational and marketing material attached to building permits, code violations, utility bills, City Hall, city website and the public library. Input from low-income and households with disabilities will also be collected through cooperation with local nonprofits, interviews with stakeholders, and questionnaires. The data will be collected once every 4 years in order to gain an understanding of the needs of lower-income and special needs households. The data will also be utilized to update future iterations of the Housing Element. Assist at least three households annually.

Timeframe: Ongoing, 2021-2029

Responsible Entity: City Clerk and City Staff

Geographic Targeting: Throughout the City.

13. Pursue Grant Funding for Affordable Housing

Successful implementation of housing programs to create affordable housing will depend on a community's ability to pursue additional funding sources. This program focuses on the two funding sources (CDBG and HOME) that are most pertinent to Westmorland; however, the City may have to go beyond these programs to pursue housing subsidies. HCD administers the federal CDBG program for non entitlement cities and counties; Westmorland is eligible to apply to HCD for general CDBG allocation. Under the HOME program, HUD will award funds to localities based on a formula that considers the tightness of the local housing market, inadequate housing, poverty, and housing production costs. HOME funding is provided to jurisdictions to assist either rental housing or homeownership through acquisition, site improvements, and other expenses related to the provision of affordable housing, or to assist with projects that serve a group identified as having special needs related to housing. The local jurisdiction must make matching contributions to affordable housing under HOME. The HOME and CDBG programs are awarded on a competitive basis.

City's Specific Role: The City will search for and apply for grant funding from State and Federal sources.

Objective: The City will coordinate with developers starting on June 2025 in order to continue supporting or pursuing additional funding sources for affordable multi-family housing developments in the city. It is vital that the City acquire funding for future developments to meet the anticipated demand of all the previously mentioned populations. Throughout the planning period, the City will submit, or provide developers with technical assistance, on at least two grant applications.

Timeframe: At least annually, pursue funding.

Responsible Entity: City Clerk and City Staff

Geographic Targeting: Throughout the City.

14. Homelessness Referral Program

The City will participate as a member of the Imperial Valley Regional Task Force on Homelessness, which addresses homeless issues countywide through a network of assistance programs and facilities. The task force resource book, which lists available programs and the names and addresses of all participating agencies and shelters, is available to all interested individuals. Catholic Charities is a local referral source to aid against homelessness or for the provision of services including meals, beds, and counseling and other support services.

City's Specific Role: The City will participate in the Imperial Valley Regional Task Force on Homelessness and provide volunteer notices to residents for the Imperial Valley Continuum of Care Councils' annual Point in Time Count.

Objective: The City will immediately participate in the Imperial Valley Regional Task Force on Homelessness and provide referrals as needed. The City will also provide informational brochures at City Hall by the first quarter of 2024.

Timeframe: Ongoing, 2021-2029

Responsible Entity: City Clerk

15. Address 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.

City's Specific Role: The City will minimize governmental constraints on housing development by increasing transparency for the development process and implement a streamlined process for reviewing project in accordance with Senate Bill 35.

Objectives:

1. The City will include an easily-identifiable link to the zoning map, development application fee schedule, and development standards on the City's website.
2. The City will adopt a streamlined, ministerial review process for qualifying housing development projects within a shortened time frame as mandated by Senate Bill 35.

Timeframe: Both objectives will be completed by July 2025.

Responsible Entity: City Clerk and Planning Department

16. Farmworker Housing

Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Most farmworkers are seasonal and are typically paid minimum or just above minimum wage. Due to their identified low income, most farmworkers would need housing subsidies or other forms of assistance to obtain adequately sized and affordable housing. It is also estimated that some farmworkers live in overcrowded conditions and substandard housing.

City's Specific Role: The City will cooperate with local organizations such as Campesinos Unidos to develop a farmworker assistance program. If a suitable program is already in place, the City will work with Campesinos Unidos to modify the program in order to assist as many farmworkers as possible.

Objective: The City will develop, or partner with Imperial County on, a farmworker housing program, by 2026, which will allow the City to meet the future demand for farmworker housing and assist in the development of at least one project of 50 units during the planning period. This includes proactively working with affordable housing developers to identify potential sites and identify funding opportunities at least every other year and ongoing. The City will support grant applications that promote farmworker housing and the City will consider fee waivers whenever it is feasible.

Timeframe: Ongoing, 2023-2029

Responsible Entity: City Clerk and Planning Department

17. Performance Monitoring Program

The City has been able to successfully implement previous programs and reach desired objectives. In order to continue an effective overall housing program, it is essential for the City to conduct a periodic assessment on progress and report the finding to the legislative body to ensure goals are progressing satisfactorily.

City's Specific Role: The City will monitor adopted housing programs and provide for the periodic reporting towards reaching desired housing objectives.

Objectives:

1. Staff will Monitor program success and shortfalls on an annual basis and report findings to City Council for action as needed.
2. The will actively seek community input and engage the public, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate. Community input will be completed at the start of each calendar year.

Timeframe: Ongoing, 2021-2029

18. Priority Water and Sewer

Pursuant to Government Code Section 65589.7, the City will develop specific procedures to grant priority sewer and water service to residential developments that include units affordable to lower- and moderate- income households.

Objectives: Implement procedures to grant priority sewer and water service to residential developments that include affordable units.

Timeframe: Adopt a formal policy adopted by July 2025

Responsible Entity: Planning Department

Quantified Housing Objectives

State Law requires Housing Elements to include quantified objectives estimating the number of housing units by income category that can be constructed, rehabilitated, and conserved over the 6th Cycle planning period (2021 – 2029). Table 33 summarizes the City’s quantified objectives for the period of October 1, 2021, to October 1, 2029. These objectives represent a reasonable expectation of the maximum number of new housing units that will be constructed, households that will be assisted through housing rehabilitation or first-time homebuyer programs, and affordable units at risk that will be preserved over the eight years based on the policies and programs outlined in the Housing Element.

According to the HCD income limits, extremely low-income is described as 30 percent below the median household income. However, SCAG does not utilize an extremely low-income category. Based on the City’s needs, it is anticipated that 25 percent of the very low-income category will be utilized for extremely low-income households. City staff will make a continuous effort to assess the progress of housing development or analyze existing policies or create new policies to help meet the housing needs.

Table 33 Quantified Objectives

Category	Extremely Low Income	Very-Low Income	Low Income	Moderate Income	Above-Moderate Income	Total
Construction	7	11	11	9	30	68
Rehabilitation	1	2	2	0	0	5
Conservation /Preservation	2	12	12	4	0	30