

Final Initial Study/Negative Declaration for the National City 6th Cycle Housing Element Update 2021-2029

National City, California



SCH No. 2021020241

July 2021

Organization of the Final Initial Study/Negative Declaration

The Final IS/ND has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] 21000-21189) and the CEQA Guidelines (California Code of Regulations [CCR] 15000-15387). This Final IS/ND is organized as follows:

Clarifications and Modifications:

This section provides a detailed description of all the clarifications and modifications that were made to the body of the Draft IS/ND. Clarifications and modifications reflect changes made to the title of the project through to consultation between the City and consultant team, and do not constitute significant new information and does not change any conclusions made.

The public review period for the 6th Cycle Housing Element 2021-2019 was scheduled for February 17, 2021 to March 19th, 2021. During that time, no comments were received from the general public or reviewing agencies, and therefore, there are no responses to comments.

A letter of a No Effect Determination for the Project was received from the California Department of Fish and Wildlife (CDFW) on March 17, 2021 during this time and is included as Appendix 8.6.

Final IS/ND:

This section includes the Final IS/ND. Revisions to the original text, per the Clarifications and Modifications section, are included in tracked changes.

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List of Acronyms

Terminology	Acronym
American Community Survey	ACS
Airport Influence Area	AIA
Assembly Bill	AB
Best Management Practices	BMP
Climate Action Plan	CAP
California Building Code	CBC
California Department of Fish and Wildlife	CDFW
California Environmental Quality Act	CEQA
National City's Construction and Demolition Debris Ordinance	C&D Ordinance
Government Code	GC
Greenhouse Gas	GHG
State Department of Housing and Community Development	HCD
Initial Study	IS
Lead Agency	National City
Local Coastal Program	LCP
Multiple Species Conservation Program	MSCP
Metropolitan Planning Organization	MPO
National City	the "City"
Negative Declaration	ND
Regional Housing Needs Assessment	RHNA
San Diego Association of Governments	SANDAG
State Implementation Plan	SIP
Senate Bill	SB
Sustainable Communities Strategy	SCS
Standard Urban Stormwater Management Plan	SUSMP
Public Resources Code	PRC
Regional Transportation Plan	RTP
U.S. Army Corp of Engineers	USACE
Vehicle Miles Travelled	VMT

Clarifications and Modifications

Modifications made to the final IS/ND include a clarification made to the title of the project as referenced in the CEQA document and does not constitute significant new information and does not change any conclusions made.

The title change is as follows: “Focused General Plan Housing Element Update” to “6th Cycle Housing Element 2021-2019”. This change was made throughout the draft IS/ND and was made to better tie the CEQA document to the title of the document that was being analyzed.

1 Final Initial Study/Negative Declaration

1.1 Introduction

This Initial Study/Environmental Checklist and Negative Declaration has been prepared pursuant to the California Environmental Quality Act (CEQA) [Public Resources Code [Section 21000, et seq.] and the 2020 State CEQA Guidelines [California Code of Regulations Section 15000, et. Seq.]. Article 6, Sections 15070 to 15075 of the 2020 CEQA Guidelines was referenced in the preparation of this Negative Declaration.

This Initial Study/Environmental Checklist and Negative Declaration determines that the adoption of the City of National City ~~Focused General Plan 6th Cycle~~ Housing Element ~~2021-2029 Update~~ project will result in no impacts or less than significant impacts on the environmental resources and issues evaluated herein, and hence not have a significant impact on the environment. As a result, this document serves as a Negative Declaration pursuant to Public Resources Code Sections 21064 and 21080 (c) and Article 6 of the 2020 CEQA Guidelines.

1.2 Background

1.2.1 Housing Element

General Plans are required by State law (Government Code Section 65302(a)) to include a Housing Element. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. A Housing Element is adopted as part of a city's General Plan and is updated on a five to eight-year basis. Each jurisdiction (city council or board of supervisors) must prepare an annual progress report on the jurisdiction's status and progress in implementing its housing element. (Government Code Section 65400.)

The 2021-2029 Housing Element represents the City of National City's effort in fulfilling the requirements under State Housing Element law. The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law." California's housing-element law acknowledges that, in order for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain), housing development. As a result, housing policy in California rests largely on the effective implementation of local general plans and, in particular, local housing elements¹. The Housing Element makes recommendations on how the City will improve its housing development process, how it will increase its share of equitable, affordable and accessible housing options for all communities, and presents an up to date inventory of sites available for housing development in an effort to increase housing opportunities within the City in the next 8 years.

Prepared for the 6th Cycle, this Housing Element serves as National City's blueprint for housing policy and regulation from April 2021 through April 2029. It takes into account the California Department of Housing and Community Development (HCD)'s guidance on the 6th cycle update, including recent legislation regarding housing; community, stakeholder and developer interviews for city-specific context on challenges and proposed solutions; and the San Diego Association of Government (SANDAG)'s Regional Housing Needs Assessment (RHNA) allocation for the planning period. The RHNA, mandated by state law, quantifies the need for housing and informs land use planning in addressing identified existing and future housing needs resulting from population, employment, and household growth.

1.2.2 Regional Housing Needs Assessment

The Region's Metropolitan Planning Organization (MPO), the San Diego Association of Governments (SANDAG) is responsible for adopting a methodology and RHNA Plan for the projection period beginning June 2020 and ending April 2029. The SANDAG Board of Directors approved the final RHNA plan with the final housing unit allocation on July 10, 2020². The City was assigned a RHNA goal of 5,437 housing units.

Table 1-1. 6th Cycle RHNA Allocation

Very Low	Low	Moderate	Above Moderate	Total
645	506	711	3,575	5,437
SANDAG, https://www.sandag.org/uploads/projectid/projectid_189_27782.pdf				

¹ U.S. Department of Housing and Community Development. <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>

² SANDAG, Regional Housing Needs Assessment 6th Housing Cycle 2021-2019 <https://www.sandag.org/index.asp?projectid=189&fuseaction=projects.detail>

1.2.3 Site Inventory

Government Code (GC) Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. That inventory must identify specific sites or parcels that are available for residential development. Pursuant to Senate Bill (SB) 6 (Chapter 667, Statutes of 2019), for a housing element or amendment adopted on or after January 1, 2021, the planning agency shall submit to HCD an electronic copy of its inventory of these parcels using standards, forms, and definitions adopted by HCD. The inventory has been prepared pursuant to this bill and has concluded adequate sites to be available for the provision of housing per the RHNA goal for National City.

1.2.4 Housing Element Implementation

Housing goals, policies, and quantified objectives regarding the production, conservation, maintenance, preservation, and improvement of housing were revised from the 2011 General Plan Housing Element. These goals and policies guide the development of the programs and strategies that would implement the housing element and result in the development of housing to satisfy the RHNA.

For each program included in the Housing Element, a timeframe for implementation, specific objectives, funding sources, and responsible agencies was identified.

Potential strategies to implement the housing element's goals and policies include:

- The adoption of an Accessory Dwelling Unit (ADU) Ordinance
- The adoption of an inclusionary housing ordinance
- Provision of incentives to supplement the State Density Bonus Program
- The development of Objective Design Standards
- The reduction of parking requirements
- Streamlining of the entitlement process
- Continuation of provision of programs that provide support for homeowners and renters

These strategies will not be adopted as part of the Housing Element Update and are not subject to CEQA analysis within this Negative Declaration. Each strategy will be subject to further discretionary review and evaluated for consistency with the General Plan. The strategies would also be subject to public review and input and subsequent CEQA clearance, as applicable, prior to adoption.

1.2.5 Consistency with Local Plans

According to state planning law, the Housing Element must be consistent with the other General Plan elements. This Housing Element builds upon other General Plan elements and is entirely consistent with the policies and proposals set forth by the General Plan.

The Region's RHNA Plan is required by state law to allocate housing units within the region in a manner consistent with the development pattern included in the Sustainable Communities Strategy (SCS). Developed in accordance with California Senate Bill 375 (SB 375), the SCS is an element of the 2050 Regional Transportation Plan (RTP). The legislation requires MPO's to prepare a SCS as part of their RTPs, along with the traditional policy, action, and financial

requirements. The primary purpose of the SCS is to show how development patterns and the transportation system will work together to reduce greenhouse gas (GHG) emissions for cars and light trucks, providing a more sustainable future for our region, including a land use component that accommodates the RHNA. The RHNA Plan was developed by SANDAG to be consistent with forecasts and strategies of the 2050 RTP and SCS, which fed into the development of the National City 6th Cycle Housing Element 2021-2029; therefore, the project is consistent with the 2050 RTP/SCS.

2 Project Information

Project Title:

National City ~~Focused General Plan Update~~ 6th Cycle Housing Element 2021-2029

Lead Agency Name and Address:

City of National City
140 E 12th Street, Suite B
National City, CA 91950

Contact Person and Phone Number:

Carlos Aguirre
National City Housing Authority Director
619-336-4391

Project Location:

National City, San Diego County

Project Sponsor's Name and Address:

City of National City
140 E 12th Street, Suite B
National City, CA 91950

General Plan Designation: Citywide

Zoning: Citywide

Description of Project:

The Project is an update to the 2011 National City General Plan Housing Element and serves as a plan to accommodate the City's housing needs of from 2021 through 2029. The proposed update would address new state laws regulating housing and would provide policy changes to encourage the production of adequate housing at all income levels to satisfy the 6th Housing Cycle RHNA goal. The Project includes a site inventory, revised programs, and revised policies to streamline the permit and development process, maintain affordability and access to housing across all income categories, and provide resources to residents. No physical development is authorized with the adoption of this Project. The 2021-2029 6th Cycle Housing Element 2021-2029 has been developed to meet California State legal requirement and is subject to review and certification by the State Department of Housing and Community Development (HCD).

The Housing Element is organized in the following manner:

Chapter 1. Introduction – Introduction to the purpose of the Housing Element, Organization of the Housing Element, A brief summary of the legislation that guided the development of the Housing Element in 2020 for the 6th Cycle.

Chapter 2. Community Profile – An updated profile on the demographics of the City as of 2020. A primer on the communities being served by this Housing Element using data sourced through U.S. Census data.

Chapter 3. Public Participation – A summary of the community, stakeholder, and developer outreach completed to gain insight and local knowledge of the City’s housing market, including challenges and potential solutions to barriers to housing production and access. Includes a summary of the feedback received from these activities.

Chapter 4. Housing Resources – A summary of the existing affordable housing resources currently available in the City, including an analysis of at-risk units, a summary on the historical use of Section 8 vouchers in the City and the updated income limits for qualifying for these vouchers, and a list of administrative and financial resources available to the City to pursue housing opportunities. Also outlines the methodology used to determine potential sites for housing within the City for the 6th Cycle. The Site Inventory located in Appendix [8.2](#) shows a map of potential sites for this analysis.

Chapter 5. Last Cycle Program Accomplishments – A brief analysis of the quantified objectives set by the 5th Cycle Housing Element (i.e. the previous housing element) and an evaluation of the success of the Programs of the 5th Cycle. Includes the recommendations made to develop the Programs and objectives established for this 6th Cycle.

Chapter 6. Housing Plan 2021-2029 – Details the Goals and Policies that guide the development and implementation of the 6th Cycle Housing Element, the Housing Programs to be implemented during the 6th Cycle, and the Quantified Objectives the City commits to meeting to implement the housing Programs.

Chapter 7. Appendices – Includes a reference table that summarizes the Programs and goals of the 6th Cycle Housing Element, the Site Inventory Map, and the Site Inventory List of Sites.

Surrounding Land Uses and Setting: The Project is city-wide. National City is a centrally located, 9.2 square-mile San Diego South Bay urban community that is home to an estimated 60, 900 residents as of 2018³. According to the 2019 RHNA from SANDAG, approximately 40.6 percent of households in National City are very low income. The City is bordered by San Diego to the north and east, Chula Vista to the south, the unincorporated areas of Lincoln Acres and Bonita to the south and southeast, and San Diego Bay to the west. National City is nearly entirely developed with a mix of residential neighborhoods and industrial and commercial uses, with access to a multitude of transit stops and the 8th St and 24th St San Diego Trolley Station within the City.

Decision-making bodies or agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The proposed Housing Element Update will require the following approvals:

- Approval of the Housing Element from the California Department of Housing and Community Development (HCD)
- Adoption of the Housing Element by the City Council of National City
- Recommend adoption of the Negative Declaration by the National City Housing Authority
- Adoption of the Negative Declaration by the City Council of National City

³ American Community Survey (ACS), Table B02001 RACE, 5-Year Estimate, (2013-2018), (2018)

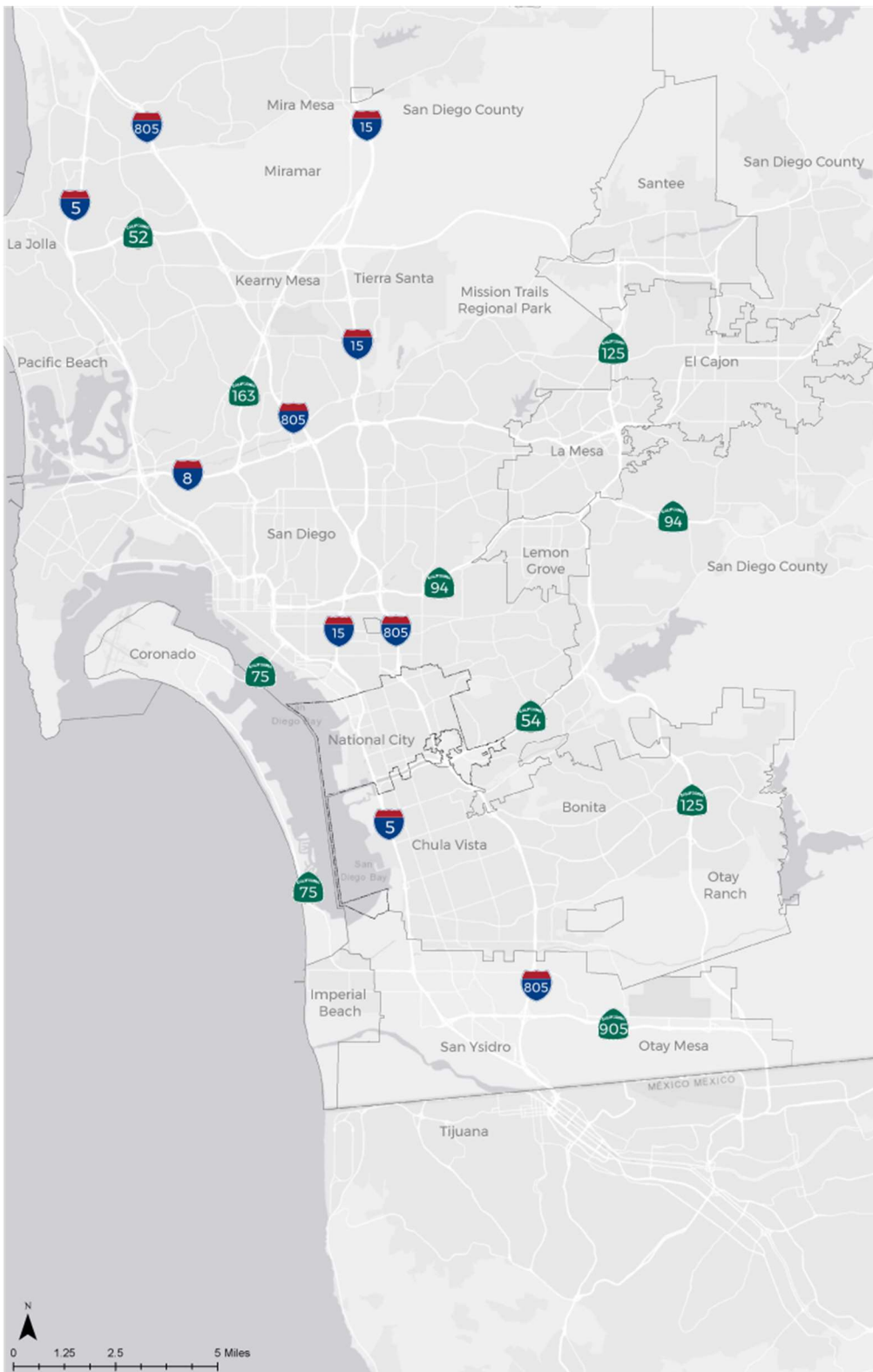
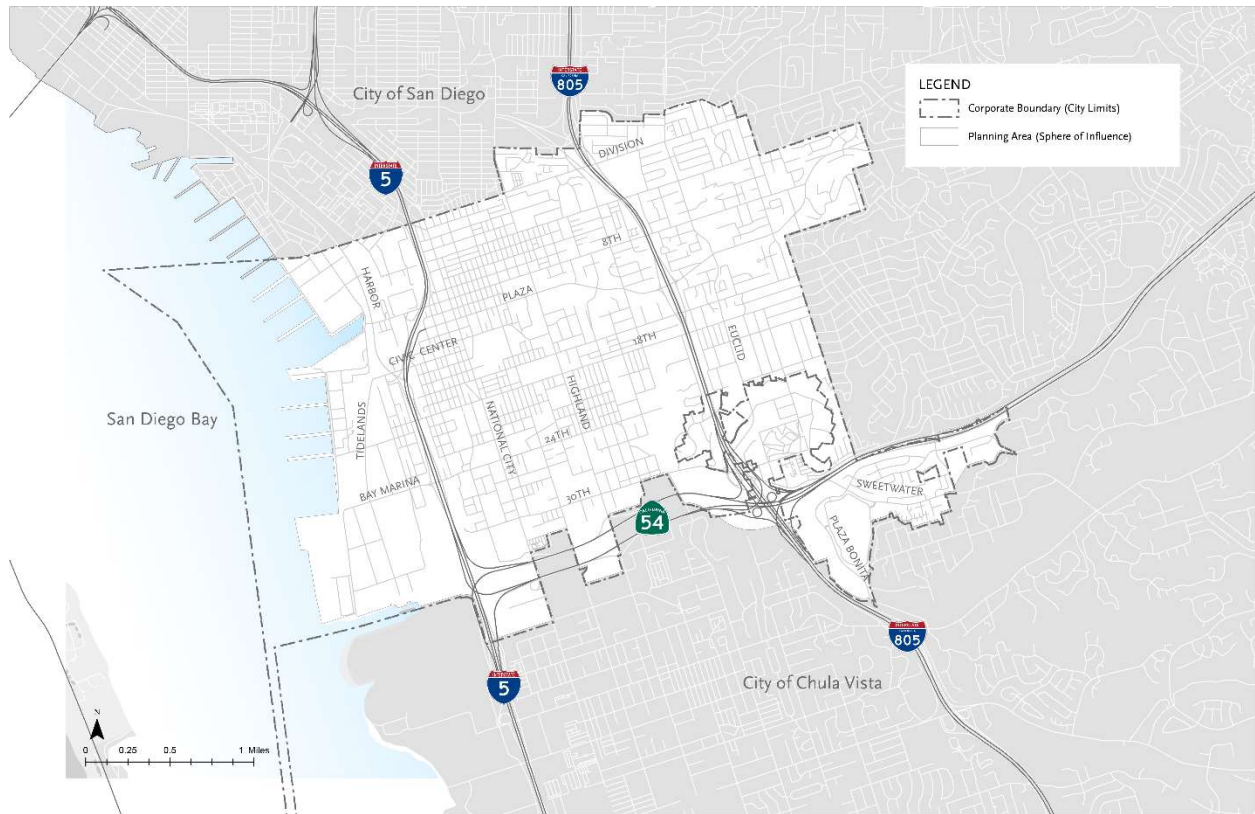
Figure 2-1. Regional Map

Figure 2-2. City Planning Boundaries

3 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- | | | |
|------------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture / Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

4 Determination

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

X

Martin Reeder, AICP
Principal Planner

5 Evaluation of Environmental Impacts

5.1 Impact Terminology

The following terminology is used to describe the potential level of significance of impacts:

- A finding of **no impact** is appropriate if the analysis concludes that there is no potential for the project to affect the resource in any way.
- An impact is considered **less than significant** if the project would not cause a substantial adverse change to the environment and would not require mitigation.
- An impact is considered **less than significant with mitigation incorporated** if the analysis concludes that the project would not cause a substantial adverse impact to the environment with the inclusion of an environmental commitment that has been agreed to be implemented by the applicant.
- An impact is considered a **potentially significant impact** if the analysis concludes that the project could have a substantial adverse impact on the environment.

6 CEQA Checklist

6.1 Aesthetics

I. AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Less than significant.

Scenic vistas in National City include limited public views of the San Diego Bay, Downtown San Diego, neighboring communities, and the San Miguel, Jamul, and San Ysidro Mountains to the east from various viewpoints in the City. The San Diego Bay is only visible from west-facing slopes at higher elevations due to the presence of the Naval Base and Port of San Diego facilities that block views from lower vantage points.⁴ Adoption of Housing Element would not authorize physical development that could result in a substantial adverse impact on a scenic vista, such as through blocking an existing view. Implementation of the programs contained in the Housing Element could result in new housing that accommodates the City's RHNA allocation and addresses the City's policies supporting affordable housing. Residential development from implementation of the Housing Element would be subject to development standards that would reduce the potential for impacts to scenic vistas. In addition, proposed projects would be subject to City review for consistency with policies such as those in the Land Use Element protecting viewsheds. Therefore, impacts would be less than significant.

b. No Impact.

No state scenic highways exist within the City.⁵ Therefore, there would be no impacts on scenic highways from the adoption and implementation of the Housing Element.

c. Less than significant.

As an urbanized city, the visual character of the City is governed by development standards within the City's Municipal Code and policies of the Land Use Element protecting community character. The Housing Element is a policy document and does not, in itself, propose or authorize development. Development resulting from implementation of the Housing Element would be subject to City review for consistency with these regulations and therefore would have a less than significant impact from a conflict with an existing zoning designation or policy.

d. Less than significant.

Existing sources of light and glare within the City include existing developments, roadways, and the presence of Navy ships along the Bayside. The Housing Element is a policy document and does not, in itself, propose or authorize development. Therefore, its adoption would not produce physical infrastructure that would create a new source of substantial light or glare that would adversely impact daytime or nighttime views in the area and would have no impact on daytime or nighttime views.

Housing development resulting from the implementation of the policies and programs of the Housing Element would be consistent with applicable policies and regulations governing light and glare. Future development from implementation of the Housing Element would be subject to City review and assessed for impacts on the community's visual character and views, as well as on its potential to introduce a substantial source of light and glare. Therefore, impacts would be less than significant.

⁴ National City, 2011 General Plan Elements – Land Use Element, 2011

⁵ Caltrans, List of eligible and officially designated State Scenic Highways, Accessed September 22, 2020, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

6.2 Agriculture and Forest Resources

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. through e. No impact.

There are no designated Prime Agricultural Land, Grazing Land, Farmlands of Local Importance, Farmlands of Statewide Importance⁶, Unique Farmland, Williamson Act Contracts, or forest lands in the City⁷. Therefore, there would be no impact to agricultural or forest lands.

The Housing Element is a policy document that addresses housing needs in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element that would result in zoning conflict or conversion of land. Therefore, there would be no impact to agricultural or forest lands.

⁶⁶ California Department of Conservation, California Important Farmlands Map Viewer, Accessed September 22, 2020
https://www.arcgis.com/home/webmap/viewer.html?featurecollection=https%3A%2F%2Fgis.conservancy.ca.gov%2Fserver%2Frest%2Fservices%2FDLRP%2FCaliforniaImportantFarmland_2018%2FMapServer%3Ff%3Djson%26option%3Dfootprints&supportsProjection=true&supportsJSONP=true

⁷ National City, 2011 General Plan – Open Space and Agriculture Element, 2011

6.3 Air Quality

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. and b. No Impact.

Adoption of the Housing Element does not authorize physical development and therefore, would not produce physical environmental impacts that would impact air quality. Therefore, there would be no impact to the implementation of an air quality management plan or from the generation of a significant level of criteria pollutant for which the region is in nonattainment with its adoption.

Implementation of the programs contained in the Housing Element could result in new housing that accommodates the City's RHNA allocation and addresses the City's policies supporting affordable housing. The Housing Element includes policies and recommendations that encourage the development of housing near existing transit and along mixed-use corridors which would mitigate impacts to air quality from vehicular emissions. In addition, the Housing Element includes policies to encourage the sustainable development of housing through existing zoning designations, such as through infill development, higher density, and energy efficiency to reduce impacts to air quality. Project-level analysis would be required for proposed development projects and would be subject to regulations and ordinances protecting air quality and governing emissions.

c. and d. No Impact.

As previously noted, the Housing Element is a policy document that does not in itself authorize the physical development of housing, and therefore does not have the ability to generate pollutants or create odors impacting sensitive receptors. Therefore, its adoption would have no impact related to odors or exposing sensitive receptors to substantial pollutant concentrations.

Future buildout of the RHNA could expose sensitive receptors, such as residential units and schools, to pollutants during construction due to the location of potential new housing sites per the Housing Element Site Inventory map. These impacts would be minimized through the implementation of local ordinances and best management practices that would reduce the impacts of pollutants on sensitive receptors during construction, such as through dust control measures. Housing developments are not typically a source of odors.

6.4 Biological Resources

IV. BIOLOGICAL RESOURCES: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a through c. No Impact.

The Housing Element is a policy document that does not authorize physical development and therefore would not result in adverse impacts to sensitive natural communities, riparian vegetation or protected wetlands. Therefore, there would be no impact to special status species, riparian areas, sensitive communities, or federally protected areas with the adoption of the Housing Element.

d. No Impact.

Fish and wildlife species inhabit National City's urban waterbodies, including the San Diego Bay, Sweetwater River, Paradise Creek, and wildlife species migrate through undeveloped portions of the City.

The Housing Element is a policy document that does not authorize physical development with its adoption and therefore would have no impacts to migratory fish or wildlife species or with wildlife corridors or nursery sites. Sites identified in the Housing Element site inventory guides the development of where future housing will be developed; no sites were selected by or within the City's waterbodies. Therefore, no impact to wildlife corridors or nursery sites would occur from implementation of the Housing Element's programs.

e. and f. No Impact.

The Housing Element, as a policy document, does not authorize physical development and therefore would not result in impacts from conflict with any applicable policies, plans, or ordinances protecting biological resources. Development of housing from implementation of the Housing Element's programs and policies would adhere to the provisions of the General Plan and municipal code's development standards as it relates to conservation. No adopted habitat conservation plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans applicable to land in National City.

6.5 Cultural Resources

V. CULTURAL RESOURCES: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Less than significant.

The Housing Element is a policy document that does not authorize the physical development of housing that could impact the significance of a historic resource. Therefore, the adoption of the Housing Element would not result in impacts to the significance of historical resources within the City. Implementation of the programs contained in the Housing Element could result in new housing that accommodates the City's RHNA allocation and addresses the City's policies supporting affordable housing. Development that would result from the implementation of the Housing Element would comply with policies and regulations contained in the Open Space and Agriculture Element of the Adopted 2011 General Plan, Chapter 18.12.160 of the Municipal Code, and the provisions within the Land Use Code, respectively, that would minimize or avoid impacts to historical resources by requiring the protection of and preservation of such resources. Any development that has the potential to do so would be subject to additional analyses under CEQA as well as review by the Planning Division and City Council. Therefore, implementation of the Housing Element would have less than significant impacts.

b. Less than significant.

Adoption of the Housing Element would not directly result in physical construction that would have the potential to impact archaeological resources. Therefore, adoption of the Housing Element would have no impact on archaeological resources.

However, resulting construction from implementation of the Housing Element's policies and programs may result in direct or indirect impacts to both known and unknown archaeological resources. Construction activities such as grading and excavation could result in the accidental destruction or disturbance of archaeological sites but would be subject to local ordinances protecting these resources. Therefore, implementation of the Housing Element would have less than significant impacts.

c. Less than significant.

Adoption of the Housing Element would not directly result in ground disturbing activities and therefore would have no impacts related to the disturbance of human remains. Implementation of the Housing Element's policies and programs could result in the development of housing that would result in the potential for uncovering human remains through ground disturbance. Adopted 2011 General Plan policies would require monitoring for sub-surface cultural resources during grading and construction for all development projects that would result from implementation of the Housing Element. If human remains are found, compliance with the California Native Graves Protection and Repatriation Act, and coordination with the local County Coroner would be required. It is noted that the site inventory's sites have been disturbed previously for former uses and would have a low potential of encountering human remains, and would therefore have a less than significant impact.

6.6 Energy

VI. ENERGY: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. and b. No Impact.</p> <p>Adoption of the Housing Element does not authorize physical development and therefore would have no impact due to wasteful or inefficient use of energy resources or from conflict with a state or local plan. The Housing Element includes policies that are consistent with the 2019 California Energy Code, and the City's Adopted 2011 Climate Action Plan (CAP) and therefore would have no impacts from conflict with applicable plans for energy.</p> <p>Development resulting from the implementation of the Housing Element's policies and programs would encourage projects to exceed the energy efficiency requirements set by the 2019 California Green Building Standards Code. The Housing Element encourages development to be constructed in smart growth areas to decrease fuel usage from vehicular use. Additionally, development would comply with the Land Use Code and policies of the Adopted 2011 CAP, which is intended to encourage efficient energy use and increase the use of clean and renewable energy sources, which would be compliant with California Title 24 Energy Efficiency Standards and the SANDAG 2014 Regional Energy Strategy.</p>				

6.7 Geology and Soils

VII. GEOLOGY AND SOILS: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. (i through iv) Less than significant.

The Housing Element is a policy document and does not authorize physical development. Therefore, its adoption would have no direct or indirect impact on the risks of loss, injury, or death from geologic hazards. It is noted that National City is located within a seismically active region and earthquakes have the potential to cause ground shaking of significant magnitude. Although located near fault lines, the National City Planning Area lies within a low to medium-low probabilistic peak ground acceleration zone. It is also not a city that was determined by CGS to be impacted by the Alquist-Priolo Earthquake Fault Zones because nearby faults do not present a risk of ground rupture in the event of an earthquake. Historically, seismic shaking levels in the San Diego region, including National City, have not been sufficient enough to trigger liquefaction. National City has a low liquefaction risk; however, there are areas in the western and southern portions of the City that have a higher risk of liquefaction due to the presence of hydric soils or soils that are often saturated or characteristic of wetlands. Regardless, development resulting from implementation of the Housing Element's policies and programs would have a low potential to cause adverse effects involving geologic hazards because development would need to comply with development standards from the 2018 Edition of the California Building Code to minimize potential adverse effects from geologic hazards. Therefore, impacts would be less than significant.

b. No Impact.

Adoption of the Housing Element would have no impact on the susceptibility of National City's soils to erosion from wind or water since the document does not authorize physical development. The soils in National City are at a limited risk of erosion, and residential development resulting from implementation of policies and programs from the Housing Element would not alter conditions in such a way as to increase the likelihood of soil erosion since National City is highly urbanized.

c. No Impact.

The Housing Element is a policy document and does not authorize physical development and therefore would have no impact on causing adverse impacts from geologic units becoming unstable as a result of the project. Soils in San Diego County are generally granitic and the County and National City has no documented incidents of subsidence. New development resulting from projected buildout of the General Plan and Land Use Code would comply with Policy S-1.3 of the Adopted 2011 Safety Element, which would require all new development and redevelopment to comply with recognized standards for geologic hazards, soils (including but not limited to subsidence and liquefaction), and seismic hazards to ensure public safety. Compliance with CBC Section 1610, Soil Lateral Loads, would be necessary and requires design that resists lateral soil loads.

d. Less than significant.

Adoption of the Housing Element does not authorize physical development and therefore would not place development on expansive soils that could create substantial direct or indirect risks to life or property.

Soils in the National City area are susceptible to expansion and compaction; however, most soils have low shrink-swell potential. The weight of new and existing structures on underlying soils can cause consolidation and long-term settlement which could lead to structural damage to buildings. Potential impacts associated with expansion and consolidation can be prevented through standard geotechnical and soils engineering investigation and analysis, as required by Municipal Code and 2019 California Building Code (CBC). All new development in National City must comply with the CBC. Furthermore, according to Policy S-1.2 under Goal S-1 of the Adopted 2011 Safety Element, new residential developments must comply with development standards and building restrictions as a means to limit seismic-related risks to acceptable levels. There would be less than significant impacts from implementation of the Housing Element.

e. No Impact.

Adoption of the Housing Element does not authorize physical development and therefore would have no impact on the installation of septic tanks or alternative sewer systems. In the event of future development of housing resulting from implementation of the Housing Element's policies and programs, Municipal Code Section 14.06.020 prohibits the installation of septic tanks or other devices for disposal of sewage in the city where there is an available sewer system within 200 feet. All development proposed under the Housing Element's programs and policies would be located within 200 feet of the available sewer system and would be prohibited from installing a septic system since National City is adequately equipped with wastewater infrastructure systems. Therefore, there would be no impacts.

f. Less than significant.

Adoption of the Housing Element does not authorize physical development and therefore would have no impacts to paleontological resources and geologic rock features since no ground disturbance would occur. There are no known unique paleontological resources within the City. The City does contain several geologic formations (i.e. geologic rock features) which include a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of earth history.

Development of housing from implementation of the Housing Element's policies and programs to fulfill the RHNA would be required to adopt minimization measures as detailed in the Open Space and Agriculture Element of the Adopted 2011 General Plan to avoid or minimize impacts to paleontological resources and geologic formations during ground disturbance. All future development activities would comply with ordinances that require mitigation in the event of an unanticipated discovery.

6.8 Greenhouse Gas Emissions

VIII. GREENHOUSE GAS EMISSIONS: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact.

Adoption of the Housing Element does not authorize physical development and therefore would have no impacts associated with greenhouse gas emissions that may have a significant impact on the environment. Implementation of the programs contained in the Housing Element could result in new housing that accommodates the City's RHNA allocation through infill development in an urbanized city, which would not result in significant generation of emissions. In addition, the Housing Element encourages the strategic and sustainable development of housing in corridors that are transit accessible and that can accommodate higher density to reduce emissions associated with development. Therefore, there would be no impacts.

b. No Impact.

The Housing Element is a policy document that proposes policies and programs that are consistent with the Adopted 2011 CAP, which is intended to serve as a guide for the City to meet GHG emissions reduction targets set by the State of California under AB 32. The CAP is consistent with the Climate Action Strategy adopted by SANDAG and the San Diego regional targets set by CARB requiring reductions in GHG emissions from cars and light trucks. In addition, the Housing Element includes continuing policies aimed at developing sustainable housing through green building standards and energy conservation requirements. The Housing Element includes policies that support the reduction of GHG gases through developing infill housing by employment and transit opportunities. Therefore, adoption of the housing element would have no impact on conflict with applicable plan, policies, or regulations adopted for the purpose of reducing GHG emissions.

6.9 Hazards and Hazardous Materials

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. and b. No Impact.

The adoption of the Housing Element, as a policy document, does not authorize development and would not result in the use, transportation, or disposal of hazardous material and waste within and throughout National City or in the accidental upset of hazardous waste that could cause hazards to the public. The Housing Element is a document that addresses the development of housing within the City, and its adoption would have no impact on hazards related to hazardous materials. The routine use, transportation, and disposal of hazardous material and waste within and through National City, is an unavoidable aspect of community operations. However, the risk of death, injury, and/or property loss is lessened through federal, State and local regulations and policies.

c. No Impact.

The adoption of the Housing Element, as a policy document that authorizes no physical development, would have no impact relating to the emission of hazardous materials within a quarter mile from a school. Implementation of the programs and policies of the Housing Element would result in the development of housing to fulfill the RHNA. This development would not occur on contaminated sites due to its intended residential use. Exposure to hazardous materials from construction would be limited, as all use of hazardous materials are subject to federal, State, and local laws that ensure that hazardous material use, emission and transportation are controlled to a safe level.

d. No Impact.

The adoption of the Housing Element, as a policy document, would not result in physical development and therefore its adoption would have no impacts related to a site that is included on the Cortese list (Government Code Section 65962.5) that could lead to exposing the public to hazardous materials. Although a number of sites in National City are included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, development would not occur on contaminated sites due to future development's intended use for residential purposes and therefore would have no impact. Development as a result of the Housing Element would comply with local ordinances and the General Plan which contains policies designed to minimize the potential to create a significant hazard to the public or the environment.

e. No Impact.

The adoption of the Housing Element, as a policy document, would not result in physical development and therefore has no impact related to creating a safety hazard or excessive noise for people residing or working in the City. No airports are located within the City. The nearest airports to National City are not within 2 miles: The San Diego International Airport is located approximately 10 miles to the northwest and the Naval Air Station North Island airport is located approximately 3 miles northwest from the City. A portion of the northeastern extent of National City, lies within the Airport Influence Area (AIA) for the San Diego International Airport. Development from implementation of the Housing Element would have no impact associated with safety hazards or excessive noise for people residing or working in the City.

f. No Impact.

Adoption of the Housing Element would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. No physical development would occur with the adoption of the Housing Element and therefore, no impacts would result. Population growth associated with development of new housing from implementation of the Housing Element may result in an increase in demand for emergency services. However, the City has adopted an Emergency Operations Plan, which includes an evacuation plan (June 2010) and a Safety Element that includes policies to maintain adequate response times with the growth of the City and therefore would have no impacts

g. No Impact.

The adoption of the Housing Element, as a policy document, would not result in physical development and would have no impact associated with placing structures or people in an area that would result in significant risk of loss, injury or death involving wildland fires. According to data from SANGIS, National City is mapped in a non-wildland area and therefore there would be no impact.

6.10 Hydrology and Water Quality

X. HYDROLOGY AND WATER QUALITY: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. and e. No Impact.

Adoption of the Housing Element, a policy document, does not authorize physical development and therefore would have no impacts associated with the violation of any water quality standards or waste discharge requirements or the obstruction of the implementation of a water quality control plan or sustainable groundwater management plan. Implementation of the programs contained in the Housing Element could result in new housing development that would be subject to the Stormwater Management and Discharge Control Ordinance and federal, State, and local water quality regulations that would further reduce the potential for impacts from construction and operation. Therefore, there would be no impacts.

b. and c. No Impact.

Adoption of the Housing Element does not authorize physical development and would have no impact groundwater supplies or recharge or impacts on the drainage pattern of the city. Development of housing from implementation of the Housing Element would be considered infill development in an urbanized city and would have no impact.

d. No Impact.

Adoption of the Housing Element would have no impact associated with flood hazard, tsunami, seiche zones, or the risk release of pollutants due to project inundation since it would not authorize any physical development. Portions of National City along the coast and at the mouths of Paradise Creek and Sweetwater River are at risk of tsunami inundation. Housing would not be developed within a tsunami inundation zone per jurisdiction of that area to the Port. The closest landlocked body of water is the Sweetwater Reservoir, located 5.3 miles to the east, and there are no landlocked bodies of water in the City itself. San Diego Bay, a partially landlocked body of water adjacent to the Planning Area, poses the greatest risk for damage due to seiche in the City; however, a geologic event or other natural disaster of an unprecedented scale for the region would be required to induce a seiche capable of significant damage to people and property. There would be no impacts from risk of damage to people and property in the City from seiche. There would be no impact associated with the risk of mudslides because the City is highly urbanized with very few slopes with inclines greater than 25 percent. Housing would not be developed on contaminated land within known flood zones; therefore, there are no impacts associated with the release of pollutants in the event of inundation.

6.11 Land Use and Planning

XI. LAND USE AND PLANNING: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. No Impact.</p> <p>Adoption of the Housing Element would not authorize the physical development of housing, nor does it propose changes to existing land use designations or zoning and therefore would have no impact on physically dividing an established community through its implementation.</p> <p>b. No impact.</p> <p>The Housing Element is a policy document and does not authorize the physical development of housing, which could result in a significant environmental impact. The Housing Element promotes infill development that is generally consistent with the Adopted 2011 General Plan, San Diego Sustainable Communities Strategy (SCS), and Regional Transportation Plan (RTP). The Housing Element does not propose changes to land use designations or zoning and therefore would have no impacts associated with policy conflicts.</p>				

6.12 Mineral Resources

XII. MINERAL RESOURCES: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a and b. No Impact.</p> <p>The State Mining and Geology Board establishes Mineral Resource Zone designations that quantify the mineral resource potential for specific locations across California. According to these designations, National City is located in the MRZ-3 zone. The MRZ-3 Mineral Resource Zone is defined as an area where the significance of mineral deposits cannot be determined from the available data. Regardless, National City contains a limited amount of land suitable for the extraction of mineral resources due to it being almost completely built out. Therefore, there are no known mineral resources or mineral resource recovery sites in the City and no impacts on mineral resources would occur from adoption or implementation of the Housing Element.</p>				

6.13 Noise

XIII. NOISE: Would the project result in:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. and b. Less than significant.

The Housing Element is a policy document that does not authorize physical development and therefore, it's adoption would not generate an increase in ambient noise levels or cause ground borne noise or vibration levels through construction. Housing developed from implementation of the policies and programs of the Housing Element would be subject to policies in the Noise and Nuisance Element and noise ordinance to address noise generation and shielding in an urbanized setting and will have less than significant impacts associated with an increase in noise levels and ground borne noise and vibration levels in excess of thresholds set by local ordinances.

c. No Impact.

Noise levels resulting from aircraft overflights, although audible and noticeable at times, does not measurably contribute to daily average noise levels in the City. The majority of the City where development would occur is not located within an airport land use plan, or within 2 miles of a public airport or private airstrip and therefore would have no impact.

6.14 Population and Housing

XIV. POPULATION AND HOUSING: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact.

The RHNA quantifies the need for housing and informs land use planning in addressing identified existing and future housing needs resulting from population, employment, and household growth. As the council of governments, SANDAG is responsible for overseeing the RHNA process for the San Diego region. SANDAG generates a RHNA figure for National City, which is the minimum number of housing units necessary to accommodate population growth for all income levels in city. National City must be able to accommodate a total of 5,437 dwelling units in the eight-year RHNA cycle from 2021 to 2029. The Site Inventory contained within the Element includes assumptions about areas where additional development is likely to occur over the next eight years, parcels that are likely to develop or redevelop, and actual densities at which development is likely to occur. The Inventory demonstrated that the anticipated RHNA goal for National City could be physically accommodated during the 6th Cycle under existing zoning designations. Therefore, there would be no impact from unexpected population growth associated with implementation of the Housing Element.

b. No Impact.

Adoption of the Housing Element would not authorize the physical development of housing or propose changes to existing land use and zoning designations that would cause displacement and therefore would have no impact.

6.15 Public Services

XV. PUBLIC SERVICES:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. No Impact.</p> <p>The adoption of the Housing Element would not result in the need for the provision of new or physically altered government facilities, which would cause significant environmental impacts from their construction. The Housing Element is a policy document that addresses housing growth within the City and does not itself generate demand for new or expanded government facilities. Therefore, there would be no impacts resulting from construction of new or expanded facilities from the adoption of the Housing Element.</p> <p>According to the National City Fire Department and Police Department, both departments are currently operating at acceptable levels and service ratio times of fire and police protection services. The National School District Facilities Master Plan (April 2014) provided enrollment projects through 2023 and concluded adequate capacity for enrollment in its existing facilities. Since the National School District Master Plan had concluded a drop in enrollment through 2023, it is unlikely that its next update would result in the conclusion that new school facilities would need to be built to accommodate the growth in population over the next eight years.</p>				

6.16 Recreation

XVI. RECREATION:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. and b. No Impact.</p> <p>The Housing Element is a policy document that addresses the need for housing within the City and its adoption does not itself generate population growth that would impact the use of existing parks and recreational facilities that would cause substantial physical deterioration of those facilities. Therefore, there is no impact on existing parks and recreational facilities associated with adoption of the Housing Element.</p> <p>Projected buildout of the RHNA goal under implementation of the Housing Element's policies and programs would result in an increase in the City's population, which would increase the use of existing neighborhood and regional parks and other recreational facilities in the National City area. The General Plan has several goals and policies designed to help ensure that the City maintains existing parks and park facilities at a quality standard through maintenance as well as to provide additional park land to serve the growing population. The provision of parks and open space would be subject to development standards on a project-level basis.</p>				

6.17 Transportation

XVII. TRANSPORTATION: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. and b. No Impact.
 Adoption of the Housing Element would not authorize physical development or propose changes in land use or zoning designation that would generate traffic that would necessitate analysis as required under CEQA Section 15064.3. The Housing Element proposes policies and programs that are generally consistent with local and regional adopted plans to reduce VMT and guides residential development along smart growth corridors to reduce VMT. Therefore, there is no impact from a conflict with applicable plans and policies or on the requirement under CEQA Guidelines section 15064.3, subdivision (b) or with applicable mobility standards with the adoption of the Element.

c. and d. No impact
 Adoption of the Housing Element does not authorize the physical development of infrastructure and incompatible uses that would result in a substantial increase in hazards or in inadequate emergency access. Adoption of the Element would have no impact on incompatible uses or result in hazards or inadequate emergency access.

Housing development resulting from implementation of the Housing Element would be required to comply with development standards, which would avoid inadequate emergency access to these developments and which would avoid the development of hazards from incompatible uses or geometric designs.

6.18 Tribal Cultural Resources

XVIII. TRIBAL CULTURAL RESOURCES: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. and b. No Impact.</p> <p>Adoption of the Housing Element, a policy document addressing housing need, would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the CRHP or in a local register, nor to a resource that is not listed but that is significant to a local California Native American tribe. It is noted that no letters were received within the consultation period from local tribes after a request for consultation (per SB 18, AB 52 and Policy OS-8.9 of the Adopted 2011 Open Space and Agriculture Element) was sent on September 9, 2020 and no resources were identified. During the last Adopted General Plan Update in 2011, it was concluded through a records search that no resources of significance to local tribes are within the City boundaries. Regardless, the adoption of the Housing Element would have no impacts on the significance of potential tribal cultural resources since it does not authorize physical development and does not propose policies that could impact potential resources.</p> <p>Development of housing from implementation of the Housing Element is not anticipated to cause an impact to a tribal cultural resource, and development of individual projects would include mitigation per local ordinances to protect unanticipated finds of resources during project construction. Mitigation would provide protection and recovery procedures to any unanticipated resource found to be impacted by a specific project's development and recognized by a local tribe.</p>				

6.19 Utilities and Service Systems

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. through c. No Impact.

Adoption of the Housing Element itself would not generate uses that require water or wastewater and therefore would have no impact since it does not require relocation or construction of service systems that could result in physical impacts; nor would its adoption require an analysis to determine adequate water supplies and wastewater capacity for future development.

As future residential development projects are proposed, each project would be evaluated on a project-level basis to ensure that adequate water supplies and wastewater infrastructure capacity does exist to serve the project and if necessary, propose mitigation. Future development resulting from implementation of the Housing Element's policies and programs would be required to consult with these water utility entities to determine adequate supply. In the event that new infrastructure or relocation is necessary, project-level analysis on physical impacts and demand and supply would be completed.

d. and e. No Impact.

Adoption of the Housing Element, by itself, would not generate uses that would cause solid waste impacts and therefore would not result in the impairment of local solid waste reduction goals or conflict with solid waste regulations. No impact would result to solid waste goals with the adoption of the Housing Element.

Solid waste generated by future development resulting from implementation of the policies and programs of the Housing Element would be subject to local requirements governing handling and disposal and would be required to be analyzed on a project-level basis for impacts and mitigation.

6.20 Wildfire

XXI. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. through c. No Impact.</p> <p>National City is not located in or near a state responsibility area or within an area classified as a very high fire hazard severity zone and therefore, no impacts would result.</p>				

6.21 Mandatory Findings of Significance

XXII. MANDATORY FINDINGS OF SIGNIFICANCE				
	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. No Impact.

The Housing Element is a General Plan policy document that addresses housing need in the City; no actual development or rezoning/re-designation of land is proposed as part of the Housing Element. Therefore, its adoption would not significantly degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory since no physical development is authorized with its adoption.

b. No Impact.

No specific development projects would occur as a result of adoption of the Housing Element; and no re-designation/rezoning of land is proposed. Therefore, adoption of the Housing Element, in itself, would not result in cumulative impacts.

Cumulative impacts resulting from future development arising from implementation of the Housing Element's policies and programs would be analyzed through the City's development review process; future development projects would be evaluated for potential cumulative impacts and for consistency with all applicable policies of the General Plan and Zoning Ordinance.

c. No Impact.

As identified throughout the analysis herein, adoption of the Housing Element, as a policy document, would not have an environmental effect that would cause substantial adverse effects on human beings either directly or indirectly. Therefore, there would be no need for mitigation measures.

Future development arising from implementation of the Housing Element's policies and programs would be analyzed on a project-level basis but is unlikely to adversely impact human beings since the intent is to provide housing that is compliant with regional, state, and local programs and regulations to human beings within National City. At the time of each project's analysis, mitigation measures would be proposed to reduce potential significant impacts to a level that is less than significant.

7 List of Preparers

Lead Agency

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8 Appendices

8.1 Notice of Intent to Adopt a Negative Declaration

8.2 Final Housing Element (April 2021)

8.3 Native American Heritage Commission Request

8.4 Native American Heritage Commission Response and Tribal Consultation

8.5 Tribal Consultation Letter per SB18/AB 52

8.6 CDFW Letter of No Effect Determination

8.1 Notice of Intent to Adopt a Negative Declaration

Notice of Intent

6th Cycle Housing Element 2021-2029

National City, California



February 2021



NOTICE OF INTENT AND AVAILABILITY FOR ENVIRONMENTAL REVIEW AND COMMENT PERIOD OF A NEGATIVE DECLARATION SCH NO. XXX

Draft Initial Study/Negative Declaration (IS/ND) Comment Period: February 17, 2021 to March 19, 2021

Notice is hereby given that the City of National City (City), as the lead agency, is proposing to adopt a Negative Declaration (ND) in accordance with the California Environmental Quality Act (CEQA) for the proposed project as identified below. A 30-day public review and comment period has been established pursuant to CEQA Guidelines Section 15073 for the Negative Declaration which has been prepared for the proposed project.

LEAD AGENCY: City of National City Housing Authority

PROJECT NAME: 6th Cycle Housing Element 2021-2029

APPLICANT: City of National City Housing Authority

LOCATION: City-wide

DESCRIPTION:

General Plans are required by State law (Government Code Section 65302(a)) to include a Housing Element. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. The Housing Element is adopted as part of a city's General Plan which is updated on a five to eight year basis. Each jurisdiction (city council or board of supervisors) must prepare an annual progress report on the jurisdiction's status and progress in implementing its housing element. (Government Code Section 65400.)

The 2021-2029 Housing Element represents the City of National City's effort in fulfilling the requirements under State Housing Element law. Prepared for the 6th Cycle, the Housing Element serves as National City's blueprint for housing policy and regulation from April 2021 through April 2029. It takes into account the California Department of Housing and Community Development (HCD)'s guidance on the 6th cycle update, including recent legislation regarding housing; community, stakeholder and developer interviews for city-specific context on challenges and proposed solutions; and the San Diego Association of Government (SANDAG)'s Regional Housing Needs Assessment (RHNA) allocation for the planning period. The RHNA, mandated by state law, quantifies the need for housing and informs land use planning in addressing identified existing and future housing needs resulting from population, employment, and household growth.

SIGNIFICANT ENVIRONMENTAL EFFECTS ANTICIPATED AS A RESULT OF THE PROJECT: The Negative Declaration prepared determined that the City of National City's Focused General Plan Update, specifically, the 6th Cycle Housing Element 2021-2019 (Project) would result in no impacts on the environmental resources and issues evaluated and therefore have no impacts on the environment with its adoption.

REVIEW AND COMMENT PERIOD:

The City of National City invites you to comment on the Negative Declaration (ND). The Notice of Intent and accompanying ND are available for a 30-day public review period from **February 17, 2021 to March 19, 2021**. Pursuant to CEQA Guidelines Section 15082, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to this notice no later than 6:00 p.m. on March 19, 2021 to the following: **Martin Reeder – AICP, Principal Planner, Planning Division, 1243 National City Boulevard, National City, CA 91950**. During this period, the Draft IS/ND will be available for review, or for purchase at the cost of reproduction, at the City of National City Planning Division by appointment between the hours of 7 a.m. and 6 p.m. Mondays through Thursdays and at the City's website: <https://www.nationalcityca.gov/community/focused-general-plan-update>

FURTHER INFORMATION: For environmental review information, please contact Principal Planner Martin Reeder at the City of National City at 619.336.4313 or mreeder@nationalcityca.gov

8.2 Final Housing Element (July 2021)



HOUSING ELEMENT

FOCUSED GENERAL PLAN UPDATE

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CITY OF NATIONAL CITY

6TH CYCLE HOUSING ELEMENT

2021-2029



1. INTRODUCTION

1.1. PURPOSE AND CONTEXT OF HOUSING ELEMENT

The Housing Element assesses current and future housing needs and constraints and establishes goals, policies, and programs to address these housing needs for the eight-year planning period (April 2021 through April 2029). National City faces the challenges of high regional housing costs, relatively low household incomes, and accommodating its share of the regional housing need given the limited availability of undeveloped, vacant land in a highly developed urban setting. Challenges such as a global pandemic (COVID-19) and economic instability are compounding many cities' inability to address ongoing difficulties of providing adequate housing due to losses in government funding and downslope market trends; this Housing Element takes into consideration the many policy changes that the City has the ability to use to provide a strong foundation for the its path forward in providing adequate, affordable housing.

Prepared for the 6th Cycle, this Housing Element serves as National City's blueprint for housing policy and regulation from April 15, 2021 through April 15, 2029. It takes into account the California Department of Housing and Community Development (HCD)'s guidance on the 6th cycle update, including recent legislation regarding housing; community, stakeholder and developer interviews for city-specific context on challenges and proposed solutions; and the San Diego Association of Government (SANDAG)'s Regional Housing Needs Assessment (RHNA) allocation for the planning period. The Housing Element makes recommendations for how the City will improve its housing development process and increase its share of equitable, affordable and accessible housing options for all communities. Furthermore, the Housing Element presents an up to date inventory of sites available for residential development in an effort to increase housing opportunities within the City in the next 8 years.

1.2. RELATIONSHIP TO STATE LAW

General Plans are required by State law (Government Code Section 65302(a)) to include a Housing Element. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community.¹ The Housing Element is adopted as part of a city's General Plan which is updated on an eight-year basis. Each jurisdiction (city council or board of supervisors) must prepare an annual progress report on its status and progress in implementing its Housing Element (Government Code Section 65400).

Government Code (GC) Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development - including vacant sites and those with a potential for redevelopment - and an analysis of the relationship of zoning and public facilities and services to these sites. That inventory must identify specific sites or parcels that are available for residential development. Pursuant to SB 6 (Chapter 667, Statutes of 2019), for a Housing Element or amendment adopted on or after January 1, 2021, the planning agency shall submit to HCD an electronic copy of its inventory of these parcels using standards, forms, and definitions adopted by HCD.

1.3. RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

According to state planning law, the Housing Element must be consistent with the other General Plan elements. While each of the elements is independent, they are also interrelated. The Housing Element is most closely tied to the Land Use Element, as residential

development capacities established in the Land Use Element are incorporated into the Housing Element. This Housing Element builds upon other General Plan elements and is entirely consistent with the policies and proposals set forth in the General Plan. When an element in the General Plan is amended, the Housing Element will be reviewed and modified if necessary to ensure continued consistency among the various elements.

1.4. RELATIONSHIP TO STRATEGIC PLAN

In 2007, National City adopted a Five-Year Strategic Plan to address community and economic development. The Strategic Plan provides guidance to promote collaboration, improve public communication, and align city departments. The Strategic Plan has undergone subsequent updates, with the most recent being in 2019.

It is recommended that a Housing Strategic Plan be developed after the adoption of this Housing Element to guide the implementation of the policies and programs of the Housing Element efficiently and to develop a plan to fund and implement programs in a timely manner during the 6th Cycle.

1.5. ORGANIZATION OF THE 6TH CYCLE HOUSING ELEMENT

The 6th Cycle Housing Element has been organized in the following manner:

Chapter 1. Introduction – Introduction to the purpose of the Housing Element; organization of the Housing Element; a brief summary of the legislation that guided the development of the Housing Element in 2020 for the 6th Cycle.

¹. California Department of Housing and Community Development, June 2020

Chapter 2. Community Profile – An updated profile on the demographics of the City using the latest data; a primer on the communities being served by this Housing Element using data sourced through the U.S. Census. Also provides an estimate of housing needs and assessment of housing constraints.

Chapter 3. Public Participation – A summary of the community, stakeholder, and developer outreach completed to gather input on recommendations, challenges, and potential solutions to barriers to housing affordability and production. Includes a summary of the feedback received from these activities.

Chapter 4. Housing Resources – A summary of the existing affordable housing resources currently available in the City, including an analysis of units at-risk of losing their affordability within the next 10 years; a summary of the Section 8 Housing Choice Vouchers (HCV) Program and the updated income limits for qualifying for these vouchers; a list of administrative and financial resources available to the City to pursue housing-related opportunities. Also outlines the methodology used to determine potential sites for housing within the City for the 6th Cycle. The Site Inventory located in the Appendices provides a map and list of potential sites for this analysis.

Chapter 5. Last Cycle Program Accomplishments – A brief analysis of the quantified objectives set by the 5th Cycle Housing Element (i.e. the previous Housing Element) and an evaluation of the success of the programs of the 5th Cycle.

Chapter 6. Housing Plan 2021-2029 – Details the goals and policies that guide the development and implementation of the 6th Cycle Housing Element; the housing programs to be implemented during the 6th Cycle; and the quantified objectives the City commits to meeting during the planning cycle.

Appendices – Includes supporting information, including a site inventory map, list of adequate sites, case studies, and capacity analysis scenarios for the Downtown Specific Plan area.





2. COMMUNITY PROFILE

2.1. COMMUNITY CONTEXT

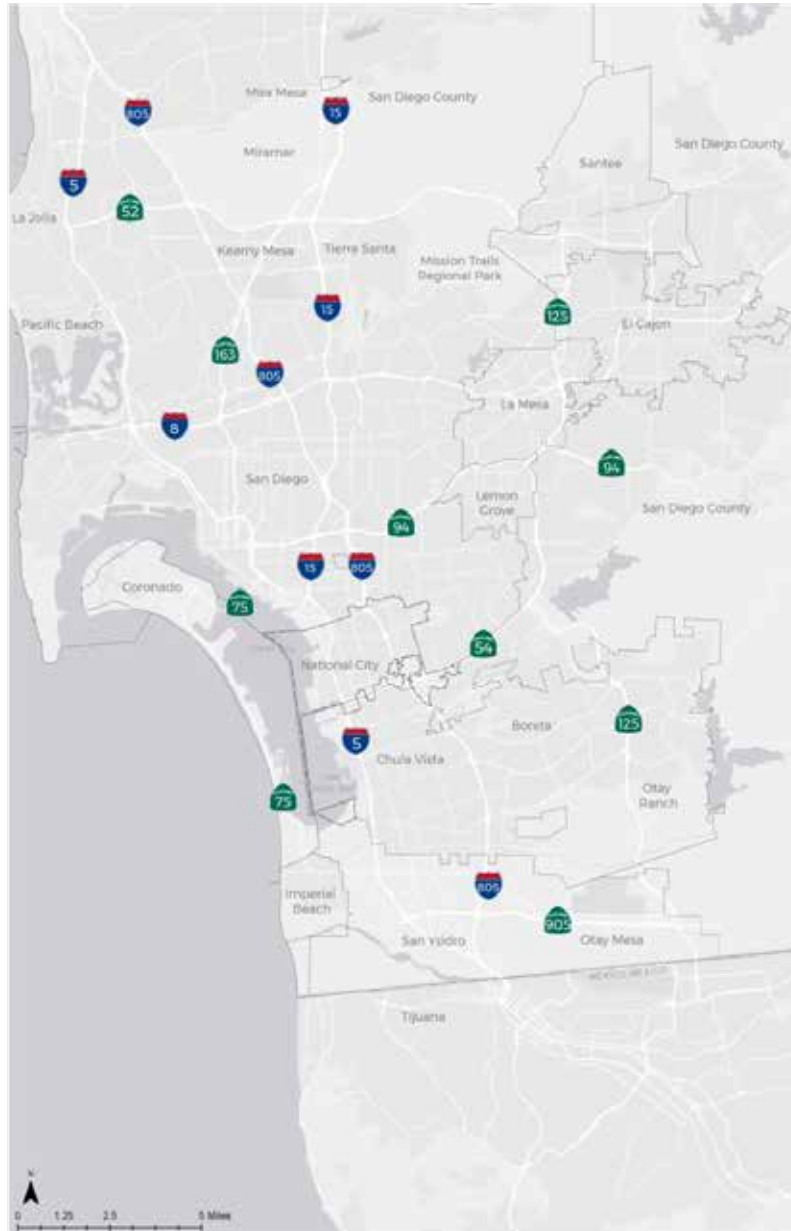
National City is a centrally located, 9.2 square mile San Diego South Bay community that is home to an estimated 61,121 residents as of 2019.² The city is bordered by San Diego to the north and east, Chula Vista to the south, the unincorporated areas of Lincoln Acres and Bonita to the south and southeast, and San Diego Bay to the west. Figure HE-1 shows where National City lies in the context of the San Diego region, and Figure HE-2 shows its planning boundaries. National City is nearly entirely developed with a mix of residential neighborhoods and industrial and commercial uses. Adopted specific plans guide the development of the downtown district and the westside “Old Town” areas. These specific plans envision supporting the existing community to establish growing, vibrant neighborhoods that encourage a mix of housing, retail services, and employment centers to support the economy and character of National City.

2. American Community Survey (ACS), Table DP05: ACS Demographic and Housing Estimates, 2019 5-Year Estimate (2015-2019)

2.2. AFFIRMATIVELY FURTHERING FAIR HOUSING: ASSESSMENT OF FAIR HOUSING

In 2017, the California legislature passed Assembly Bill 686 (AB 686). The bill aims to ensure California cities are taking active steps to affirmatively further fair housing in their communities through the implementation of their Housing Elements. AB 686 requires all cities to include a robust analysis of local conditions that lead to barriers to access of fair housing for community members, especially those belonging to protected classes. This analysis entails an assessment of fair housing within the city, accomplished through critically examining integration and segregation, racially and ethnically concentrated areas of poverty, access to opportunities, disproportionate housing needs, and other relevant factors. The assessment also includes a roadmap of goals and actions the city will take to affirmatively further fair housing in their jurisdiction. An assessment of fair housing issues to inform the goals, policies, and programs recommended in this 6th Cycle Housing Element is included as Appendix A.

Figure HE-1: Regional Context



2.2.1. POPULATION CHARACTERISTICS

POPULATION TRENDS

In a span of five years from 2015 to 2019, National City's population increased by approximately 1.8 percent.³ As projected by SANDAG for the Series 11 2030 Regional Growth Forecast Update, population growth is expected to continue to outpace housing construction. Over time, this imbalance will result in an increase in household size (the number of persons per household), a decrease in vacancy rates, and an increase in the amount of interregional commuting, primarily from southwestern Riverside County and northern Baja California.⁴ SANDAG projects the region's population will grow by nearly one million people by 2050. This forecast is consistent with previous expectations, although future growth rates have been reduced due to increased domestic migration out of the region. The growth in population will drive job growth and housing demand within the San Diego region, adding nearly 500,000 jobs and more than 330,000 housing units by 2050.⁵

Locally, National City has seen a population increase as well as a change in age demographics. The median age increased from 32.2 in 2015 to 34.2 in 2019, and a major decrease in 35-44 year old persons and youths show that the number of families has decreased in the city. The age group increasing the most in the City between 2015 and 2019 is 85+ year olds. Table HE-1 and Table HE-2 present the population growth and age distributions in 2015 and 2019.

3. American Community Survey (ACS), Table DP05: ACS Demographic and Housing Estimates, 2019 5-Year Estimate (2015-2019), American Community Survey (ACS), Table DP05: ACS Demographic and Housing Estimates, 2015 5-Year Estimate (2011-2015)

4. San Diego Association of Governments (SANDAG), Series 11: 2030 Regional Growth Forecast Update - Historical Projection, September 2006; Accessed April 16, 2020

5. SANDAG, Series 13: 2050 Regional Growth Forecast Update - Historical Projection, October 2013; Accessed April 16, 2020

Figure HE-2: National City Planning Boundaries

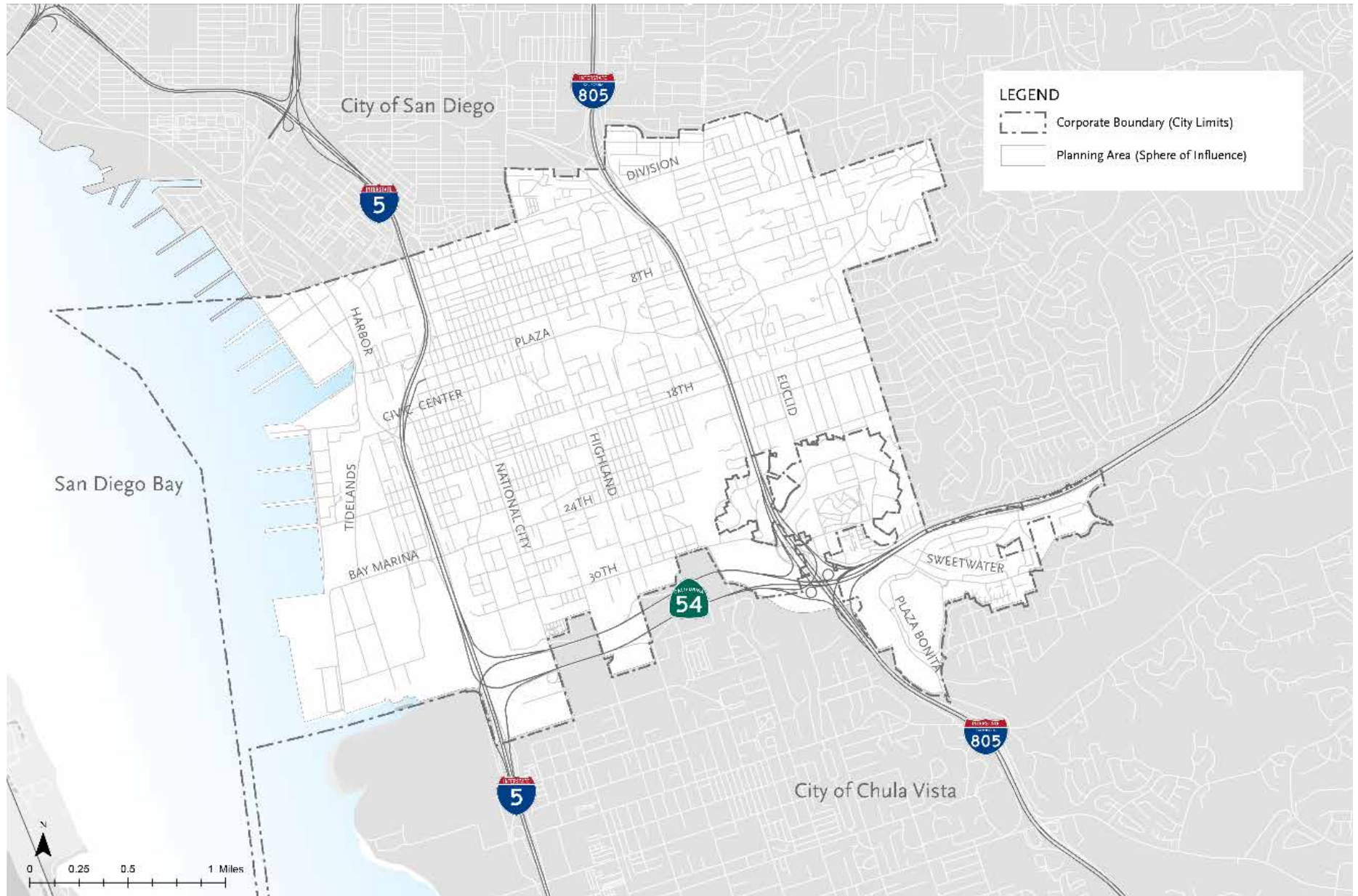


Table HE-1: Population Growth Trends 2015-2019

Year	Population	Growth Rate/Year	Total Percent Change
2015	60,043	215.6 persons/year	+1.8%
2019	61,121		

SOURCE: ACS, TABLE DP05: ACS DEMOGRAPHIC AND HOUSING ESTIMATES, 2019 5-YEAR ESTIMATE (2015-2019), TABLE DP05: ACS DEMOGRAPHIC AND HOUSING ESTIMATES, 5-YEAR ESTIMATE (2011-2015), 2015

Table HE-2: Population Age Trends 2015-2019

Age Group	Percentage of Population		
	2015	2019	Change
0-9 years	12.7	10.8	-0.15
10-19 years	14.3	13.5	-0.06
20-24 years	11.5	10.3	-0.10
25-34 years	15.1	17.0	+0.13
35-44 years	13.5	11.5	-0.15
45-54 years	11.8	11.4	-0.03
55-59 years	5.9	6.7	+0.14
60-64 years	4.4	5.4	+0.23
65-74 years	5.5	6.4	+0.16
75-84 years	3.5	4	+0.14
85+ years	1.8	2.9	+0.61
Median Age	32.2	34.2	

SOURCE: ACS, TABLE S0101, AGE AND SEX, 5-YEAR ESTIMATE, 2015; ACS, TABLE S0101, AGE AND SEX, 5-YEAR ESTIMATE, 2019

EMPLOYMENT INDUSTRIES

The industries in which National City residents are employed are represented in Table HE-3 and Figure HE-3. In addition, approximately 7,446 residents serve as part of the armed forces.⁶ National City has an approximately 64.8 percent labor force participation rate, with a 50.6 percent employment/population ratio and 6.6 percent unemployment rate. Of the population aged 25 to 64 years old, which represents approximately 52.1 percent of the total population, there is a relatively high (8.1 percent) unemployment rate among persons with less than high school graduate educational attainment, who represent approximately 21.2 percent of the total population.⁷ An understanding of the local service sectors and educational attainment can assist the City in determining the income levels, travel patterns from work and home, and key constraints to housing affordability for its residents.

INCOME

Household incomes are grouped into the following categories based on the Area Median Income (AMI) for a metropolitan area:

- » Extremely Low: 0-30% of AMI
- » Very Low: 31-50% of AMI
- » Low: 51-80% of AMI
- » Moderate: 81-120% AMI
- » Above Moderate: Over 120% AMI

The term “lower income” is generally used to collectively refer to extremely low, very low, and low income households. As shown in Table HE-4, approximately 67.5 percent of National City households fall into the lower income category while 32.5 percent fall into the

6. ACS, Table K202301 Employment Status for the Population 16 Years and Over, 2019: Supplemental Estimates Detailed Tables

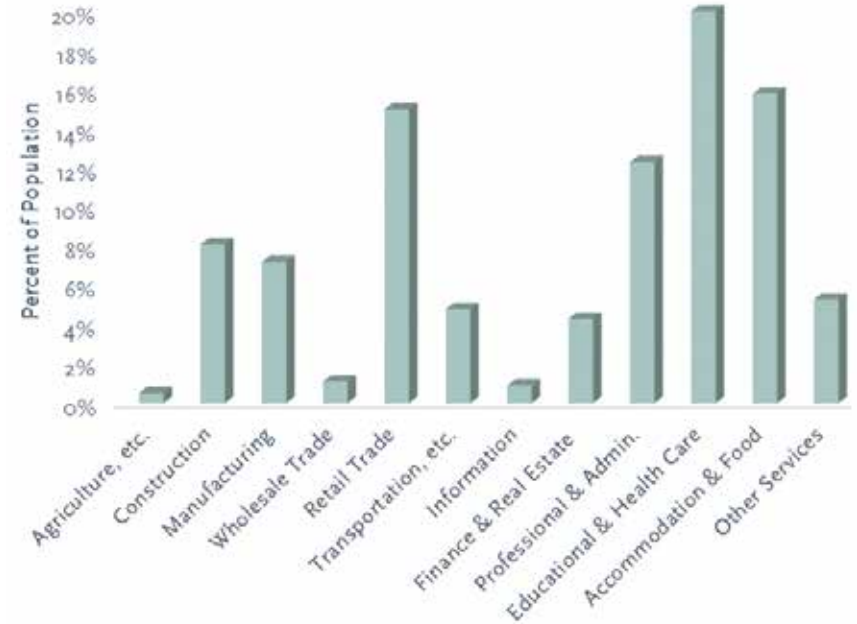
7. ACS, Table S2301 Employment Status, 5-Year Estimate 2015-2019, 2019

Table HE-3: Resident Employment Industries

Service Sector	Estimated Number of Persons	Percent of Population
Civilians Employed	25,221	100%
Agriculture, forestry, fishing and hunting, and mining:	130	0.5%
Construction	2,036	8.1%
Manufacturing	1,807	7.2%
Wholesale Trade	269	1.1%
Retail Trade	3,784	15.0%
Transportation and warehousing, and utilities:	1,202	4.8%
Information	217	0.9%
Finance and insurance, and real estate and rental and leasing	1,073	4.3%
Professional, scientific, and management, and administrative and waste management services	3,094	12.3%
Educational services, and health care and social assistance	5,023	20.0%
Arts, entertainment, and recreation, and accommodation and food services	3,994	15.8%
Other services, except public administration	1,346	5.3%
Public administration	1,246	4.9%

SOURCE: ACS, TABLE S2403 INDUSTRY BY SEX FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER 5-YEAR ESTIMATE (2015-2019), 2019

Figure HE-3: Comparison of Employment Industries



SOURCE: ACS, TABLE S2403 INDUSTRY BY SEX FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER 5-YEAR ESTIMATE (2014-2018)

Table HE-4: Households by Income Category

Income Category	% of County AMI	Income Range (1)	National City (2)		San Diego County (2)	
			Households	Percent	Households	Percent
Extremely Low	30% AMI or less	\$19,959 or less	4,365	27.0%	155,060	13.9%
Very Low	31-50% AMI	\$19,560 - \$33,259	2,905	17.9%	136,890	12.3%
Low	51-80% of AMI	\$33,260 - \$53,219	3,660	22.6%	186,170	16.7%
Moderate or Above	Over 80% of AMI	\$53,220 or more	5,270	32.5%	633,615	57.0%
Totals			16,200	100.0%	1,111,735	100.0%
SOURCE: (1) THE AREA MEDIAN INCOME FOR A FAMILY OF FOUR IN THE SAN DIEGO REGION IS \$66,529. SOURCE: SANDAG, FINAL RHNA HCD DETERMINATION LETTER FOR THE SAN DIEGO REGION, ATTACHMENT 1: TABLE 4.3 – INCOME CATEGORIES, 2020; HCD DETERMINATION LETTER						
(2) SOURCE: DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD) AND COMPREHENSIVE HOUSING AFFORDABILITY STRATEGY (CHAS) (2013-2017).						

moderate or above moderate category. Compared to the County's overall percentage of lower income households (43.0 percent), National City has a significantly higher lower income population.

Additionally, National City household incomes are typically less than the rest of the County. The median household income in National City is \$47,119. The median household income for the County, however, is \$66,529. National City's median income is approximately 29.2 percent lower than the that of the County. The low- median income is an indicator that it is necessary to maintain affordable housing programs and objectives throughout this cycle of the Housing Element to prevent the displacement of these communities and to appropriately support the residents of the City. The 6th Cycle RHNA allocation from SANDAG seeks to reduce the historical patterns of income segregation and burden on the jurisdiction's resources to serve a certain demographic. For example, SANDAG has allocated a higher number of moderate and above moderate income housing goals to National City and a higher number of lower income housing

goals to jurisdictions that have historically been more affluent to create a more diversified housing market throughout the region to allow for residents to be able to access housing opportunities in jurisdictions they otherwise would have been priced out of.

2.2.2. HOUSEHOLD CHARACTERISTICS

AVERAGE HOUSEHOLD SIZE AND OVERCROWDING

The demographics of households within National City are presented in Table HE-5 through Table HE-7. Of the total number of households (16,658 as of the 2019 ACS 5-Year Census), approximately 16.9 percent are limited-English speaking compared to just 6.3 percent in the County.⁸ These households can face challenges securing higher paying jobs and accessing affordable and adequate housing needs. Programs and objectives for this Housing Element Cycle should strive to provide accessibility to households that require assistance

8. ACS, Table S1602, LIMITED ENGLISH SPEAKING HOUSEHOLDS, 5-Year Estimates, (2015-2019), 2019

in using resources to meet their needs. The tables below represent demographics that the City has programmed its housing goals and objectives to serve. It is noted that demographics such as cultural background and age play a role in the perception of overcrowding and space needs. For instance, in many cultural backgrounds, families with children living with extended family members in a shared space are commonplace. Age and cultural beliefs can also impact family size increases, such as after a couple becomes married or when parents age. These beliefs impact the needs and preferences of residents as they seek housing options.

The average household size in National City is approximately 3.33 persons. Overcrowding refers to a housing situation in which there is more than one person per room (including any rooms that are not bedrooms, hallways, kitchens, or bathrooms). This style of occupancy is typical in large families living in smaller homes that cannot accommodate only one person per bedroom; these families instead often repurpose rooms such as a living room into a bedroom space. The rate of overcrowding can indicate that a community does not have an adequate supply of affordable housing, thus forcing individuals with larger families and lower incomes to share a housing unit to meet housing costs as well as other living costs. As seen in Table HE-6, 14.6 percent of the estimated number of occupied housing units in the City are overcrowded (over 1 persons per room) compared to 7 percent in the County.⁹

Of the current occupied housing units, a large majority of residents represent a wide range of ages, from under 35 years of age though 64 years of age. The age characteristics of residents are summarized in Table HE-7. An indicator of affordability and the adequacy of the stock of appropriately sized units in the city can be gleaned from the number of units occupied by age groups and their income, as well

Table HE-5: Estimated Households by Type

Types of Households	ACS 2015-2019	
	Estimate	Percent
Total Households	16,658	100%
Families		
Married Couple Family	7,489	45%
with Children under the age of 18	3,117	18.7%
Cohabitating couple	963	5.8%
with Children under the age of 18	498	3%
Male-Led Household (No spouse/partner present)	2,763	16.6%
with Children under the age of 18	232	1.4%
Female-Led Household (No spouse/partner present)	5,443	32.7%
with Children under the age of 18	1,263	7.6%
Grandparents		
Number of grandparents living with own grandchildren under 18 years old	2,854	17.1%
Grandparents responsible for grandchildren	597	3.6%
Householder Living Alone	3,654	22%
65+ Seniors Living Alone	1,725	10.4%
Households with one or more people under 18 years old	6,373	38.3%
Households with one or more people over 65 years and over	5,359	32.2%
Average Household Size	3.33	
Average Family Size	3.9	
SOURCE: AMERICAN COMMUNITY SURVEY (ACS), TABLE DP02 SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES 5-YEAR ESTIMATE (2015-2019), 2019		

9. ACS, Table S2501 Occupancy Characteristics, 5-Year Estimates (2015-2019), 2019

Table HE-6: Household Size and Average Number of Occupants per Room for National City

Type	Estimate of Occupied Housing Units	Percent Occupied Housing Units
Total	16,658	--
1-person household	3,654	21.9%
2-person household	3,927	23.6%
3-person household	3,236	19.4%
4-or-more-person household	5,841	35.1%
Average Number of Occupants per Room		
1.00 or less occupants per room	14,222	85.4%
1.01 to 1.50 occupants per room	1,533	9.2%
1.51 or more occupants per room	903	5.4%
SOURCE: ACS, TABLE S2501 OCCUPANCY CHARACTERISTICS, 5-YEAR ESTIMATES (2015-2019), 2019		

Table HE-7: Age Characteristics of Residents

Age	Estimate of Occupied Housing Units	%	Owner Occupied	%	Renter Occupied	%
Total	16,658	100	5,987	36	10,761	64.6
Under 35 years	3,141	18.9	516	8.8	2,626	24.4
35 to 44 years	2,673	16.0	800	13.6	1,873	17.4
45 to 54 years	3,192	19.2	1,202	20.4	1,990	18.5
55 to 64 years	3,316	19.9	1,458	24.7	1,858	17.3
65 to 74 years	2,046	12.3	958	16.2	1,088	10.1
75 to 84 years	1,350	8.1	553	9.4	797	7.4
85 years and over	939	5.6	410	7.0	529	4.9
SOURCE: ACS, TABLE S2502 DEMOGRAPHIC CHARACTERISTICS FOR OCCUPIED HOUSING UNIT, 5-YEAR ESTIMATE, (2015-2019), 2019						

as from the percentage of occupied units by renter and owner. Age groups of residents can also be an indicator of what types of housing stock are needed, since as people age, the sizes and types of homes, as well as income amount put forth into housing, changes with their needs.

2.3. CITY HOUSING CHARACTERISTICS

2.3.1. CURRENT RESIDENTIAL LAND USE

The City's current land use composition, presented in Figure HE-4, shows that a majority of the geographic area of the City allows for residential land uses.

As seen in Figure HE-5, most employed residents in National City live east of the Interstate 5 (I-5) freeway and along the length of the Interstate 805 (I-805). The majority of homes in National City are centered away from the Port and San Diego Bay, clustered in single-family home neighborhoods with multifamily housing interspersed. The concentration of housing along the coast seen in Figure HE-5 is on-base military housing which does not count towards the City's residential population. This analysis can assist with determining where new housing stock can potentially be placed and where housing is currently occupied. A sense of community also tends to be strengthened in residential neighborhoods where resources such as places of worship, school facilities, and community parks are located, which can also play a role in assessing where new housing would be most well received.

2.3.2. CURRENT HOUSING STOCK CHARACTERISTICS

HOUSING AGE AND CONDITION

A factor used to determine if housing stock in the city is adequate and contributes positively to the community is the age and state of the home. As seen in Table HE-8, the majority of homes in National City were built approximately 40 to 60 years ago. This age distribution is an indicator that programs and objectives should seek to assist homeowners in rehabilitating homes to maintain livability and neighborhood character in order to continue making communities inviting places to live and develop. The age of homes in the community can also help the City determine which sites may be more useful to redevelop into new housing stock to reduce the impacts of blight, as well as to adequately provide for modern housing needs in the community. The current distribution of the age of homes in National City also indicates that a majority of homes in the City were built prior to the 1990 Americans with Disabilities Act (ADA), which results in a lack of accessible homes for those residents experiencing a disability. The City's older housing stock also reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in National City who likely have a lower income or a fixed income, such as seniors.

In general, rehabilitation needs may range from minor to substantial issues. During the 5th Cycle, over 1,728 housing units were inspected. Approximately 1,362 housing-related code violations were abated during the planning cycle, as well, which represents approximately 8.2 percent of National City's housing stock. The most common issues witnessed by housing and code inspectors include deferred maintenance of roofing and structural members, flooring, plumbing,

Figure HE-4: Residential Land Uses and Zoning

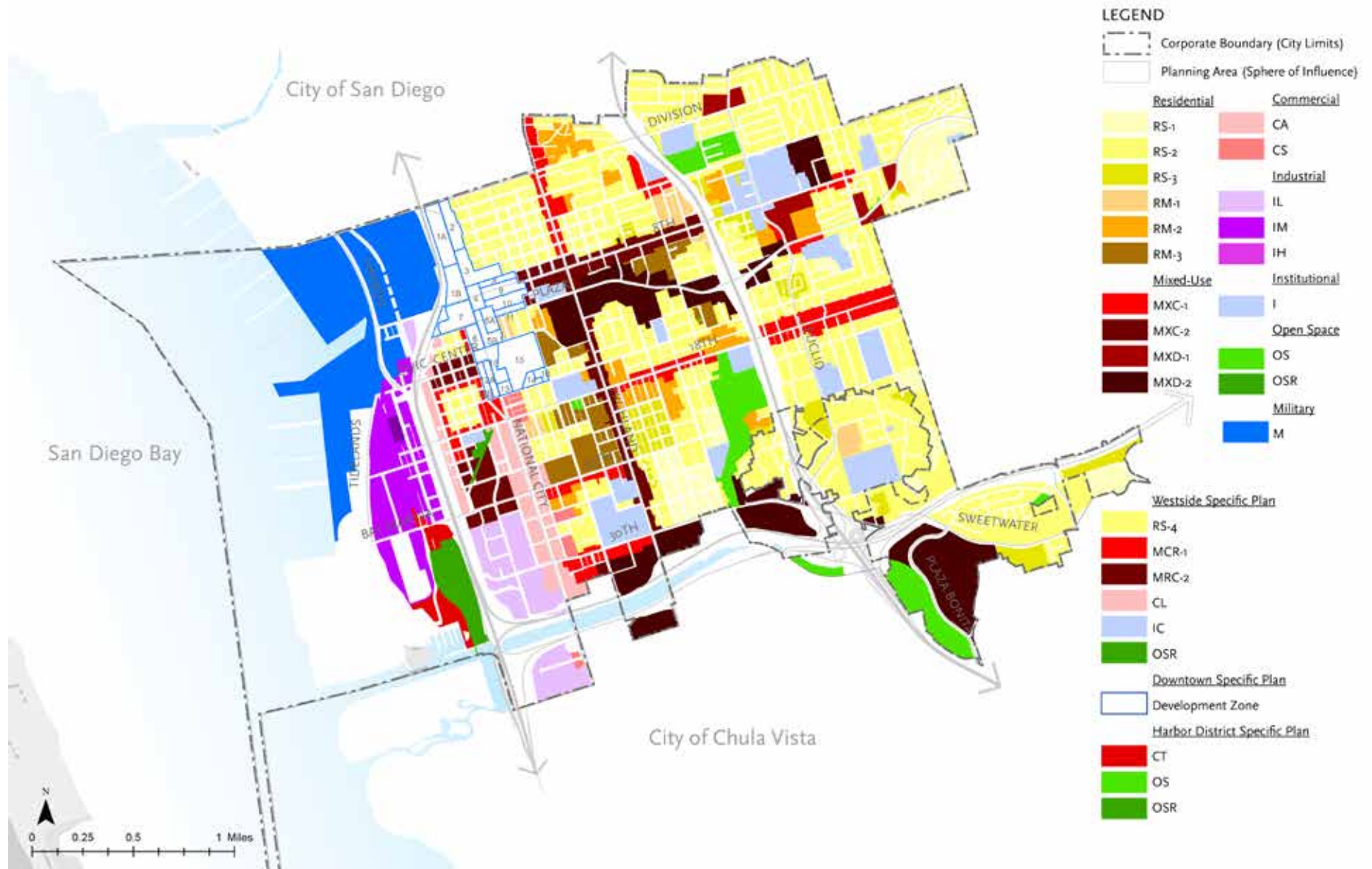
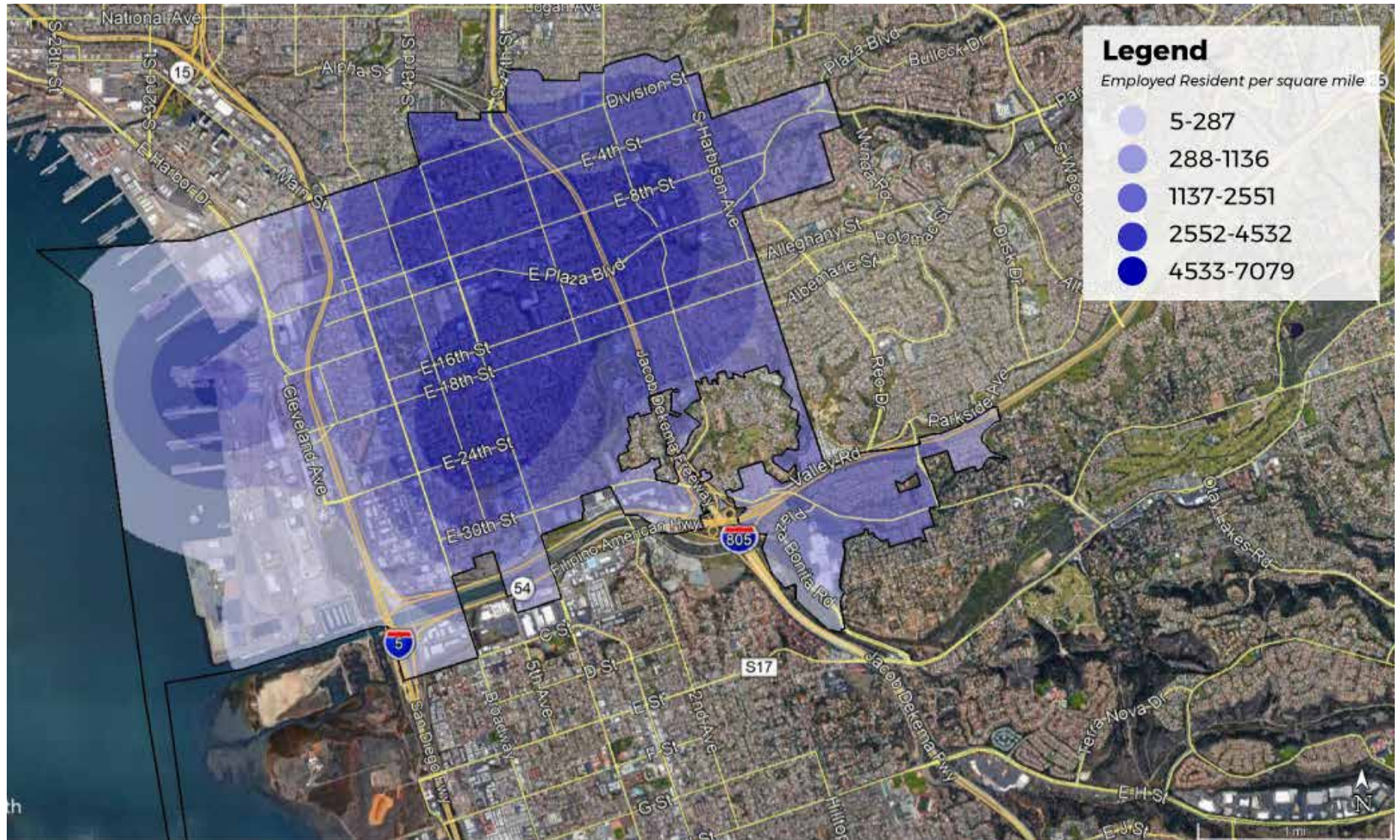


Figure HE-5: Patterns of Where Working Residents Live in National City



SOURCE: U.S. CENSUS BUREAU, ON THE MAP, 2017

Table HE-8: Age of Homes in National City

Year Built	Number of Occupied Housing Units	Percent
Built 2014 or later	138	0.8
2010-2013	246	1.5
2000-2009	811	4.9
1980-1999	3,366	20.2
1960-1979	6,236	37.4
1940-1959	4,590	27.6
1939 or older	1,271	7.6
Total	16,658	100
SOURCE: ACS, TABLE S2504 PHYSICAL HOUSING CHARACTERISTICS FOR OCCUPIED HOUSING UNITS, 5-YEAR ESTIMATES (2015-2019), 2019		

and outdated electrical systems that cannot handle the load of modern appliances.¹⁰

Substandard units are those in need of repair or replacement. Based on 2019 ACS data, 1.3 percent of housing units in National City display substandard conditions. Approximately 0.3 percent of housing units lack complete plumbing facilities and 1.0 percent lack complete kitchen facilities. This data indicates that at a minimum 202 units within National City are substandard and in need of rehabilitation.¹¹ Taking into consideration housing age and observed code enforcement violations, however, the need for rehabilitation is likely much higher. With 72.6 percent of homes constructed 40 to 60 years ago, as many as 12,097 units could be in need of repair or replacement if they have not been well maintained.

AFFORDABILITY & 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.¹²

The median home value in National City is \$459,377, with a median list price of \$429,900 and a median selling price of \$453,000.¹³ The median rental price for National City single-family homes is \$2,407 per month and \$2,058 per month for condos. Median apartment rental prices range from \$1,305 for a one-bedroom apartment to \$1,750 for a three-or-more bedroom apartment, according to the San Diego County Apartment Association’s 2019 rental property survey. The average rental prices for apartments in National City are shown in Table HE-9.

In Table HE-10, a comparison of the estimated monthly housing costs and average home prices show that housing in the City is unaffordable in relation to the AMI of National City. As shown in Table HE-11, a large percentage of owners and renters currently have a high cost burden, or in other words, are overpaying for their housing. Furthermore, Table HE-11 also shows that a large number of lower income households are overpaying for their housing; 10,930 National City households at or below 80% of the HUD Area Median Family Income (HAMFI) spend up to 50% of their income on housing. Within all lower income and housing payment brackets, the highest number of households overpaying for their housing are those with an HAMFI of 30% or less and who spend between 30% and 50% of their

12. County of San Diego Housing and Community Development Services, Rental Assistance and Affordable Housing Directory 2020

13. U.S. Census Bureau, Highlights of Annual 2019 Characteristics of New Housing, 2019, <https://www.census.gov/construction/charts/highlights.html?>, Accessed August 2020

10. April 5, 2021 Correspondence with Manager of Neighborhood Services.

11. ACS, Table DP04, SELECTED CHARACTERISTICS, 5-Year Estimates, (2015-2019), 2019.

Table HE-9: Average Monthly Rent by Unit Type

Unit Type	Fall 2019 Units/Properties Surveyed	Fall 2019 Monthly Rent	Fall 2019 Rent/Sq. Foot	Prior Spring 2019 Monthly Rent	Prior Fall 2018 Monthly Rent
1 Bedroom	30/5	\$1,305	\$2.26	\$1,005	---
2 Bedrooms	21/7	\$1,429	\$1.74	\$1,567	\$1,075
3+ Bedrooms	1/1	\$1,750	\$1.76	\$1,750	\$1,900
SOURCE: SAN DIEGO COUNTY APARTMENT ASSOCIATION 2019 RENTAL PROPERTY SURVEY.					

Table HE-10: Average Affordability of Rent and Home Prices

Household Size	Annual Income Limits (2019)	Affordable Costs		Utilities		Affordable Rent	Affordable Home Price
		Renters	Owners	Renters	Owners		
Extremely-Low Income (0-30% AMI)							
1-Person	\$22,500	\$563	\$140	\$140	\$197	\$423	\$52,511
2-Person	\$25,700	\$643	\$180	\$180	\$225	\$463	\$55,304
3-Person	\$28,900	\$723	\$219	\$219	\$253	\$504	\$58,329
4-Person	\$32,100	\$803	\$260	\$260	\$281	\$543	\$60,889
5-Person	\$34,700	\$868	\$321	\$321	\$304	\$547	\$56,525
Very-Low Income (31-50% AMI)							
1-Person	\$37,450	\$936	\$140	\$140	\$328	\$796	\$109,051
2-Person	\$42,800	\$1,070	\$180	\$180	\$375	\$890	\$119,975
3-Person	\$48,150	\$1,204	\$1,204	\$219	\$421	\$985	\$131,131
4-Person	\$53,500	\$1,338	\$1,338	\$260	\$468	\$1,078	\$141,823
5-Person	\$57,800	\$1,445	\$1,445	\$321	\$506	\$1,124	\$143,888
Low Income (51-80% AMI)							
1-Person	\$59,950	\$906	\$1,057	\$140	\$370	\$766	\$127,344
2-Person	\$68,500	\$1,036	\$1,208	\$180	\$423	\$856	\$140,881
3-Person	\$77,050	\$1,165	\$1,359	\$219	\$476	\$946	\$154,651
4-Person	\$85,600	\$1,295	\$1,510	\$260	\$529	\$1,035	\$167,956
5-Person	\$92,450	\$1,398	\$1,631	\$321	\$571	\$1,077	\$172,036

Figure HE-9: Average Affordability of Rent and Home Prices (Cont.)

Household Size	Annual Income Limits (2019)	Affordable Costs		Utilities		Affordable Rent	Affordable Home Price
		Renters	Owners	Renters	Owners		
Moderate Income (81-120% AMI)							
1-Person	\$72,500	\$1,661	\$1,938	\$140	\$678	\$1,521	\$260,616
2-Person	\$82,850	\$1,899	\$2,215	\$180	\$775	\$1,719	\$293,193
3-Person	\$93,200	\$2,136	\$2,492	\$219	\$872	\$1,917	\$326,002
4-Person	\$103,550	\$2,373	\$2,769	\$260	\$969	\$2,113	\$358,345
5-Person	\$111,850	\$2,563	\$2,990	\$321	\$1,047	\$2,242	\$377,657
Note: The table provides estimates on affordable rents and purchase prices by income category based on the 2019 HCD income limits for San Diego County. General cost assumptions for utilities, taxes, and property insurance are also shown. Affordable purchase price assumes a four-percent interest rate with a 30-year fixed-rate mortgage loan and a five percent down payment.							
Assumptions:							
1. California Department of Housing and Community Development (HCD) income limits, San Diego County, 2019. 2. Health and Safety code definitions of affordable housing costs (between 30 and 35 percent of household income depending on tenure and income level). 3. Housing Authority Of The City Of National City Housing Choice Voucher Program Monthly Utility Allowances (gas), 2018. 4. 35 percent of the monthly affordable cost for taxes and insurance. 5. Five percent down payment. 6. Four percent interest rate for a 30-year fixed-rate mortgage loan. 7. Taxes and insurance apply to owner costs only; renters do not usually pay taxes or insurance.							
Sources:							
1. HCD Income Limits, 2019. 2. Veronica Tam and Associates, 2020.							

Table HE-11: Cost Burden of National City Households

Housing Cost Burden Overview			
	Owner %	Renter %	Total Households
Cost Burden $\leq 30\%$	3,530	4,560	8,090
Cost Burden $>30\%$ to $\leq 50\%$	840	3,025	3,865
Cost Burden $>50\%$	750	3,260	4,010
Cost Burden not available	85	145	230
Total	5,205	10,990	16,195
Income by Cost Burden Overview			
	Cost Burden $>30\%$	Cost Burden $>50\%$	Total Households
Household income $\leq 30\%$ HAMFI	3,425	2,760	4,365
Household income $>30\%$ to $\leq 50\%$ HAMFI	2,150	930	2,905
Household income $>50\%$ to $\leq 80\%$ HAMFI	1,580	225	3,660
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.			
Source: HUD, Consolidated Planning/CHAS Data, National City, 2013-2017 ACS, Accessed December 30, 2020			

income on housing (3,425). Thus, the most overpayment for housing currently occurs among those with the lowest incomes.

NUMBER OF TYPES/UNITS

National City has a variety of housing types, with the highest number of single-family detached homes and units in developments with 5 or more units. Table HE-12 shows the breakdown of types of housing units within the city.

Based on the physical characteristics of the existing housing stock and the high number of families with four or more persons, National City’s existing housing stock does not adequately meet the space needs of a high percentage of its residents without overcrowding. The high number of two or three bedroom owner-occupied and rental units indicates that these may be the most affordable options that meet the minimum size needs of residents, including through overcrowding. The high percentage of owner-occupied, four-or-more bedroom housing units, coupled with the relatively low percentage of large families, indicates that a majority of large families are unable to own an adequately size home. Table HE-13 shows the breakdown of number of bedrooms and tenure type.

Table HE-12: Number of Housing Units by Type

Housing Type	Number of Units
Single Detached	7,472
Two to Four Units	1,619
Five or More Units	6,174
Mobile Homes	439
SOURCE: E-5 CITY/COUNTY POPULATION AND HOUSING ESTIMATES. CALIFORNIA DEPARTMENT OF FINANCE, 2020.	

Table HE-13: Physical Housing Characteristics and Tenure Type

Unit Size	Owner-Occupied		Renter-Occupied		Total Occupied Housing Units	
	Units	%	Units	%	Units	%
No bedroom (Studio)	51	0.9	680	6.3	731	4.4
1 bedroom	206	3.5	3,746	34.8	3,952	23.7
2 or 3 bedrooms	4,081	69.2	5,860	54.5	9,941	59.7
4 or more bedrooms	1,559	26.4	475	4.4	2,034	12.2
SOURCE: ACS, TABLE S2504 PHYSICAL HOUSING CHARACTERISTICS FOR OCCUPIED HOUSING UNITS, 5-YEAR ESTIMATES (2015-2019), 2019						

2.4. ESTIMATE OF HOUSING NEEDS

2.4.1. RHNA ALLOCATION OF HOUSING UNITS

Based on the HCD Regional Housing Need Determination for the 6th Cycle RHNA, SANDAG has determined through their methodology that the housing unit allocation for National City for the period between June 30, 2020 through April 15, 2029 is as stated in Table HE-13. Compared to the 5th Cycle, which had allocated approximately 1,863 units to National City for the period between 2013 and 2020,¹⁴ the 6th Cycle has allocated 5,437 units to National City. SANDAG used factors such as the equity assessment, jurisdictions with access to transit, and the number of employment opportunities to calculate the allocation for National City.¹⁵ This allocation is an approximate two percent increase in new housing that is expected to be provided within this jurisdiction over the next eight years, as compared to the 5th Cycle allocation.

According to SANDAG, the following factors are meant to comply with requirements of State law and further the objectives of the County in achieving goals such as fair housing, transit accessibility, and climate resiliency. When housing development is promoted near transit and jobs in areas that are already more densely populated and developed than other areas of a jurisdiction, it allows the jurisdiction to focus on infill development that can occur without reliance on the availability of additional land, but instead on underutilized land that

can be converted to uses that allow for increased residential density.¹⁶ The factors are as follows:¹⁷

- » **Equity Assessment** – The adjustment seeks to increase the jurisdiction’s mix of housing for each income category and reduce historical patterns of segregation and burden on a jurisdiction’s resources to serve a certain demographic.
- » **Transit Access** – Allocates housing units based on each jurisdiction’s share of regional rail and Rapid bus stations as well as major transit stops. Rail and Rapid bus stations are located in the region’s more developed areas where land uses generate enough ridership to support the investment to the transit infrastructure. Major transit stops are also located in the region’s urbanized areas and surrounded by land uses that support higher service frequencies. By prioritizing transit connectivity, the methodology encourages infill development in urban areas that are likely to have existing capacity for sewer or water service.
- » **Jobs** – The jobs factor seeks to encourage development of housing near job centers so that jurisdictions can achieve greater jobs-housing balance. The analysis showed that the number of low-wage jobs far exceeds the number of existing housing units affordable to low-wage workers in each jurisdiction. Jurisdictions can provide opportunities for more residents to live near their place of employment, promoting infill development, and improving the intraregional relationship between jobs and housing.
- » **Climate Resiliency** – Improved access to transit can also lower the vehicle miles traveled in a car and reduce greenhouse gas emissions. Higher density development can also assist a jurisdiction in reducing impacts associated with sprawl.

14. National City, Final Housing Element of the General Plan 2013-2020, April 2013

15. SANDAG, A Resolution Adopting the Final Regional Housing Needs Assessment Methodology for the Sixth Housing Element Cycle (2021-2029) for the San Diego Region, Resolution No. 2020-13, November 2019

16. SANDAG, Final 6th Cycle Regional Housing Needs Assessment Methodology, November 2019

17. SANDAG, A Resolution Adopting the Final Regional Housing Needs Assessment Methodology for the Sixth Housing Element Cycle (2021-2029) for the San Diego Region, Resolution No. 2020-13, November 2019

As shown in Table HE-14, SANDAG used a scaling factor to determine the percentage of housing to be allocated per the RHNA based on the number of existing households in each income category. Compared to the County, National City has been allocated a comparable number of very low, low, and moderate income households in their RHNA, and has been allocated approximately double the number of above moderate households. SANDAG's intention in allocating this distribution of housing is to increase the distribution of housing opportunities for all income levels across the region.

Pursuant to State law, National City must project the number of extremely low income housing needs. However, this is not a specified income group in the RHNA. AB 2634 allows for this target to be determined based on Census data related to income distribution

or the City may assume 50 percent of the very-low income units as extremely low-income. Income distribution data has been used to determine the projected number of extremely low income housing needs as described below.

Based on 2013-2017 Comprehensive Housing Affordability Strategy (2017 CHAS) data prepared by the Census Bureau for the U.S. Department of Housing and Urban Development (HUD), a total of 7,270 households are identified as either extremely or very low income in National City. Of these households, approximately 60.0% are extremely low-income and 40.0% are very low-income. Applying these percentages to National City's 645 very low income RHNA units, approximately 387 should be reserved for extremely low-income households and 258 for very low-income households.

Table HE-14: SANDAG 2020 RHNA Equity Allocations Type

RHNA Determination	Very-Low		24.7%	Low		15.5%	Moderate		17.3%	Above Moderate		42.5%
	House-holds (%)	Scaling Factor	Alloca-tion (%)	House-holds (%)	Scaling Factor	Alloca-tion (%)	House-holds (%)	Scaling Factor	Alloca-tion (%)	House-holds (%)	Scaling Factor	Alloca-tion (%)
National City	40.6	0.61	15.0	20.6	0.75	11.7	17.9	0.96	16.7	20.9	2.04	86.5

SOURCE: SANDAG, FINAL 6TH CYCLE REGIONAL HOUSING NEEDS ASSESSMENT PLAN, TABLE 4.5: EQUITY ADJUSTMENT CALCULATION, JULY 2020

Table HE-15: HCD Regional Housing Allocation for National City

Needs Assessment for 2021-2029 for National City (in Units)					
Extremely Low	Very Low	Low	Moderate	Above Moderate	Total Allocation
387	258	506	711	3,575	5,437

SOURCE: SANDAG, REGIONAL HOUSING NEEDS ASSESSMENT: RESPONSE TO BOARD REQUESTS – AUGUST 23, 2019; SANDAG, DRAFT 6TH CYCLE RHNA ALLOCATION (NOVEMBER 2019); HCD, FINAL REGIONAL HOUSING NEED DETERMINATION, ATTACHMENT 1, JULY 2018

NOTE: NATIONAL CITY'S VERY-LOW RHNA IS 645 UNITS. PURSUANT TO STATE LAW, NATIONAL CITY MUST PROJECT THE NUMBER OF EXTREMELY LOW INCOME HOUSING NEEDS. HOWEVER, THIS IS NOT A SPECIFIED INCOME GROUP IN THE RHNA. AB 2634 ALLOWS FOR THIS TARGET TO BE DETERMINED BASED ON CENSUS DATA RELATED TO INCOME DISTRIBUTION OR THE CITY MAY ASSUME 50 PERCENT OF THE VERY-LOW INCOME UNITS AS EXTREMELY LOW-INCOME. INCOME DISTRIBUTION DATA HAS BEEN USED TO PROJECT THAT 60.0% (OR 387 UNITS) SHOULD BE RESERVED FOR EXTREMELY LOW-INCOME HOUSEHOLDS AND 40.0% (OR 258) FOR VERY LOW-INCOME HOUSEHOLDS.

Chapter 5 details the RHNA housing goal that was not met in the 5th housing cycle (2013-2020). For the 6th Cycle, the City's RHNA goal is as detailed in Table HE-15. The appendices contain a map and inventory of sites to meet the RHNA allocation.

2.4.2. HOUSING NEEDS IN NATIONAL CITY

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level and housing problems for different types of households.

As shown in Table HE-16, a majority of renters and a large number of owners are experiencing a housing problem that may impact their options for quality housing. The Housing Element should implement programs to assist with rehabilitation, renovations, and funding assistance to facilitate improving the quality of the existing housing stock. New housing stock should strive to be affordable to the various income groups present in the City and to provide quality housing options throughout the City. Development standards and the available sites for housing can assist in constructing affordable, quality housing to meet the needs of residents.

With the costs of housing, both current and new, steadily rising due to the housing constraints identified in Section 2.5 below, the City has prioritized considering the integration of inclusionary housing practices, the allocation of funds to programs meant to support fair and affordable housing, and reducing barriers to housing development through reducing constraints in permitting by adopting by-right development for a variety of housing types.

The City has worked to increase resources and opportunities for its residents under the context of the City housing a population with one of the lowest AMI's in the County. One of the supportive resources

the City has offered is an on-going fair housing program that provides counseling on fair housing issues. A translation feature on the City's website allows for the Housing Authority to share information on its programs in Spanish as one of its outreach strategies. In addition, the City is prioritizing new development in areas that have historically experienced fair housing issues from prior land use decisions. For example, the City has been continually investing in the area around the 8th Street and 24th Street Transit Stations to provide additional housing opportunities that can transition industrial land uses to more productive ones for the City and help meet the projected housing need. In addition, this development would increase access to opportunities such as transit and mixed-use corridors. Several affordable housing development projects (Roosevelt Tower, Coachella Affordable Housing Investors Project, etc.) and market rate projects are also moving forward in this area to increase access to fair housing opportunities.

2.4.3. NEEDS OF SPECIAL HOUSEHOLDS

Government Code Section 65583(a)(7)) requires "An analysis of any special housing needs, such as those of the elderly, persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter..."¹⁸

NEEDS OF SENIORS

Senior households often have special needs due to relatively low income levels, disabilities, chronic illnesses, mobility limitations, and/or dependency on caretakers or community services as they

¹⁸. Government Code Title 7. Planning and Land Use [65000-66499.58] Division 1. Planning and Zoning [65000 – 66301], Chapter 3. Local Planning [65100 - 65763], Article 10.6. Housing Elements [65580 – 65589.11], 65583.

Table HE-16: Housing Needs based on Housing Problems

	Owner	Renter	Total Households
Housing Problems Overview 1 (1)			
Household has at least 1 of 4 Housing Problems	1,960	7,360	9,320
Household has none of 4 Housing Problems	3,165	3,505	6,670
Cost burden not available - no other problems	80	125	205
Total	5,205	10,990	16,195
Severe Housing Problems Overview 2 (2)			
Household has at least 1 of 4 Severe Housing Problems	1,210	4,740	5,950
Household has none of 4 Severe Housing Problems	3,915	6,125	10,040
Cost burden not available - no other problems	80	125	205
Total	5,205	10,990	16,195
NOTES: (1) THE FOUR HOUSING PROBLEMS ARE: INCOMPLETE KITCHEN FACILITIES, INCOMPLETE PLUMBING FACILITIES, MORE THAN 1 PERSON PER ROOM, AND COST BURDEN GREATER THAN 30%. (2) THE FOUR SEVERE HOUSING PROBLEMS ARE: INCOMPLETE KITCHEN FACILITIES, INCOMPLETE PLUMBING FACILITIES, MORE THAN 1.5 PERSONS PER ROOM, AND COST BURDEN GREATER THAN 50%.			
SOURCE: HUD, CONSOLIDATED PLANNING/CHAS DATA, NATIONAL CITY, 2013-2017 ACS, ACCESSED DECEMBER 30, 2020 HTTPS://WWW.HUDUSER.GOV/PORTAL/DATASETS/CP.HTML			

continue to age. According to the HUD, by 2050 the population of individuals who are 65 and older in the United States is projected to double.¹⁹ This significant increase pulls the needs of seniors closer to the forefront in planning for new housing stock and for rehabilitating existing homes in the next decade. In National City, approximately 13.4% of the total population was 65 years or older as of 2019, and approximately 12.1% of the population will reach the age of 65 or older

within the next decade.²⁰ In addition, approximately 1,725 seniors (2.8% of the total population) in National City live alone.²¹ Of the 16,658 housing units in National City, 4,335 (26%) are occupied by individuals who are 65 and older. There is a relatively even distribution of elderly renters and owners in National City, with a slightly higher percentage of elderly residents owning their housing units; 1,921

19. U.S. Department of Housing and Urban Development (HUD), Meeting Future Housing Needs of Seniors, Accessed April 14, 2020

20. ACS, Table DP05: ACS Demographic and Housing Estimates - American Community Survey 5-Year Estimates 2015-2019, 2019

21. ACS, Table DP02: Selected Social Characteristics in the United States - American Community Survey 5-Year Estimates 2015-2019, 2019

(12%) of National City's housing units are owned by elderly residents and 2,414 (15%) of the units are rented by elderly residents.

To assist seniors in continuing to be able to live in their homes, often independently, and within their known communities for as long as possible (i.e. aging in place), improving physical home accessibility includes assessing the ability of existing housing stock to be modified and renovated to include such features as ramps, doorways and hallways that can accommodate wheelchairs or walkers, and single-floor living. Often, homes built before the Fair Housing Act's design and construction requirements (prior to March 1991) do not include these features. It is also noted that detached single-family homes, however, are not subject to the design and construction requirements of the Fair Housing Act. Assisted living communities are also becoming increasingly more unaffordable and can limit the options that a senior resident can have for housing options. Often, seniors will need to be able to easily access transit to care for their personal needs and be able to find affordable, and adequately sized housing options by resources such as medical centers and grocery stores. Seniors often reside with families in single-family detached housing (i.e. intergenerational housing) and can also require that these homes be able to be renovated to provide easier access and safety for their mobility.

NEEDS OF PERSONS WITH DISABILITIES

The Americans with Disabilities Act (ADA) defines a disabled person as having a physical or mental impairment that substantially limits one or more major life activities. Thus, 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. Of National City's approximately 55,546 noninstitutionalized person population, roughly 7,078 persons

identify as having a disability (12.7% of the total population).²² These disabilities are varied: approximately 2,065 residents identify as having a hearing disability, 1,318 have a vision disability, 2,647 have a cognitive disability, and 4,235 have an ambulatory disability. Roughly 2,110 residents have a disability that impacts their self-care capability and 3,952 have a disability that limits their ability to live independently.²³ Residents with an ambulatory disability or another disability that impacts their capability to care for themselves or live independently often benefit from or require group living opportunities or the availability and provision of in-home assistance. Some residents suffer from disabilities that require living in a supportive or institutional setting. There are a number of housing types appropriate for people living with a developmental disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group, as well as those with a hearing, vision, and/or ambulatory disability. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

NEEDS OF LARGE HOUSEHOLDS

Large households are defined as those homes consisting of five or more members residing together. There is often a lack of adequately sized and affordable housing options for these households. According to the San Diego Regional Analysis of Impediments to Fair

22. ACS, Table S1810: Disability Characteristics - American Community Survey 5-Year Estimates 2015-2019, 2019

23. ACS, Table S1810: Disability Characteristics - American Community Survey 5-Year Estimates 2015-2019, 2019

Housing Choice, there are 3,073 households in National City with five or more people. Of those, 1,183 are owner-occupied and 1,890 are renter-occupied.²⁴ As of 2019, approximately 17,652 total housing units exist within the City, with only 1,608 of those units at minimum adequately sized for a five-person household (five rooms) (i.e. 9.1% of total households).²⁵

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, in 2019 National City had 1,533 overcrowded units and 903 severely overcrowded units. Furthermore, 349 of the overcrowded units were owner-occupied and 1,184 were renter-occupied. 162 severely overcrowded units were owner-occupied and 741 were renter-occupied.²⁶

Lower-income persons and families often times reside together in smaller sized units to be able to afford basic necessities such as housing costs, food, clothing, medical care, and education. Lower and low to moderate income households could benefit from affordable housing programs designed to lower the cost of rent or the cost of purchasing a home, and programs that assist in educating persons on navigating the housing market. This category also includes intergenerational housing, an important cultural living pattern typically practiced by the City's residents, who face the challenges of

large households as well as households with seniors, single parents, and those with disabilities.

NEEDS OF FARM WORKERS

Farm workers (i.e. agricultural workers) are defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor, which often results in persons who depend on affordable housing options. National City does not have an accurate count of how many of these workers reside in the City due to its relatively small size, and therefore, Census data is referenced for the size of this demographic present in the City. As of 2019, approximately 130 persons work within the agriculture, forestry, fishing and hunting, and mining industry in National City and roughly 12,184 San Diego County residents work within the industry.²⁷ based on this Census data, very few individuals employed in the agricultural industry either live in National City and commute to farms elsewhere or live and work in National City. Because a negligible portion of community residents are employed in this industry, the needs of farmworker households can be accommodated through housing programs and policies that assist lower-income households in general rather than specific programs targeting this special needs group.

NEEDS OF SINGLE PARENT HOUSEHOLDS (FEMALE-HEADED)

Single parent households, in particular female-headed families, often require special assistance such as accessible day care, health care, and other supportive services. Of the total households in National City, approximately 5,443 identify as having a female householder, with no spouse or partner present (32.7%).²⁸ Because of their low income

24. San Diego Regional Analysis of Impediments to Fair Housing Choice, 2020.

25. ACS, Table DP04: Selected Housing Characteristics - American Community Survey 5-Year Estimates 2015-2019, 2019

26. ACS, Table S2501: Occupancy Characteristics - American Community Survey 5-Year Estimates 2015-2019, 2019

27. ACS, Table C24070: Industry by Class of Worker for the Civilian Employed Population 16 Years and Older - American Community Survey 5-Year Estimates 2015-2019, 2019

28. ACS, Table DP02: Selected Social Characteristics in the United States - American Community Survey 5-Year Estimates 2015-2019, 2019

and higher family expenses, many single parent households live in poverty. Programs that assist in acquiring housing or rent reductions can assist single parent households in accessing affordable housing options.

NEEDS OF THE HOMELESS

Factors contributing to the increase of homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the de-institutionalization of the mentally ill. Homeless shelter facilities are limited in National City. Only one such facility, a domestic violence shelter for women and children, is physically located in the City. Most of the homeless shelters and services in the Southern San Diego County region are in Chula Vista. According to the Regional Task Force (RTF) on the Homeless WeAllCount (PITC) annual estimates, as of 2020, the total point in time count of those persons “living on the street” or staying in homeless shelters is estimated at 128 persons.²⁹ With the rise of homelessness in the City due to the COVID-19 pandemic and rising regional housing costs, transitional shelters, homeless shelters and services, and programs committed to assisting people with basic necessities and with gaining financial independence is more necessary than ever.

NEEDS OF MILITARY PERSONNEL

Military personnel are often constrained by lower incomes and an uncertain length of residency. Although a large percentage of National City’s work force is employed by the military, no military housing is provided in the City, and many military families live off-base due to the lack of base housing and the close proximity to the military base.

As seen in Figure HE-5. Residential Centers of Working Residents in National City, the darker, larger dot on the map centered over the coast represents the on-base housing for military personnel.

The housing needs of most military personnel based at Naval Base San Diego are met by the United States Navy. For military personnel that are not accommodated in base housing, the federal Service-Members Civil Relief Act (SCRA), signed into law in 2003, offers protections and benefits if they are relocated or activated for military duty. The SCRA affords military personnel and their families an early lease termination option, eviction protection, mortgage relief, interest rate caps, and the ability to reopen default judgments under certain circumstances. The Navy projects that by 2023 an additional roughly 10,000 military personnel will be working within National City as more personnel are stationed at Naval Base San Diego under the Pivot to the Pacific initiative.³⁰ With this population growth will be a need for housing options that are not only affordable, but provide sizing (such as ADUs) and leasing terms fitting to this demographic.

NEEDS OF COLLEGE STUDENTS

It is noted that a lack of affordable housing can impact the retention of the skilled labor of college graduates in the area which is vital to the growing economy. In National City, approximately 4,474 persons are enrolled in college or graduate school (29.6% of the total population), while approximately 22.2% of the total population holds an Associate’s degree or higher.³¹ The multitude of colleges in the San Diego region serve many students throughout all of San Diego’s jurisdictions, but cannot provide adequate on-campus housing for a

30. Port of San Diego, Harbor Drive Multimodal Corridor Study, Appendix F Land Use Growth Assumptions & Volume Forecasting, January 2020

31. ACS, Table DP02: Selected Social Characteristics in the United States - American Community Survey 5-Year Estimates 2015-2019, 2019

29. Regional Task Force on the Homeless, 2020 WeAllCount Annual Report for San Diego County, <https://www.rtfhsd.org/wp-content/uploads/2020-WeAllCount-Report-8.pdf>

majority of them. This population is often low-income and would be better served by an affordable housing stock.

2.5. HOUSING CONSTRAINTS

2.5.1. NON-GOVERNMENTAL CONSTRAINTS

Market constraints refer to factors that can impact the ability of a city to maintain and improve the state of existing housing stock, limit the construction of affordable housing, and impede the preservation of affordable housing. This includes the availability of land for residential development, land and construction costs, construction financing, and mortgage and rehabilitation financing.

VACANT LAND

National City is fully developed and has very little vacant land remaining for development. According to the SanGIS 2019 parcels layer, only 1.6 percent of National City's planning area is comprised of vacant and undeveloped land.

The cost of raw land typically accounts for a large share of total housing production costs as well as the necessary improvements that must be made to a particular site. This scarcity of land presents a constraint to fair housing because the cost of demand is passed onto the homeowner or renter. This cost places unfair burden upon lower income communities, especially in National City which is known for its low AMI compared to the Count. These communities are priced out of existing and new opportunities when provisions ensuring the affordability of housing are not implemented.

CONSTRUCTION MATERIALS AND LABOR COSTS

Construction materials and labor costs directly impact the price of housing. According to the Turner Center, these hard construction costs account for more than 60 percent of the total cost for residential development. For multi-family development, construction costs have increased over 25 percent (an increase of approximately \$44 per s.f.) during the past decade.

The cost of building materials can vary significantly based on the quality, size, and type of building product being used; costs can also fluctuate based on their supply and demand. Costs for wood, plastics, and composites, which are common building materials, increased by 110 percent. The Turner Center also found that Type I construction, which includes high-rise buildings that require concrete and steel, is significantly more expensive than other construction types.

Construction labor costs are also a factor in achieving affordable housing. In the case of affordable housing projects, prevailing wage requirements for labor costs of construction could effectively reduce the number of affordable units that can be achieved with public subsidies. According to the Turner Center, prevailing wage requirements can add an average of \$30 more per square foot than those without such requirements. Programs that assist in partnering with non-profits that can reduce the labor costs associated with constructing housing can potentially improve affordability of new homes.

While the cost of housing can vary based on the size and scale of the proposed development project, Table HE-15 details the average cost of new construction for a single-family home in 2019, based on nationally collected data from the National Association of Home Builder's 2019 Construction Cost Survey. The median size of a new single-family home sold in 2019 was 2,322 square feet, with the

median contract price to build was \$281,700.³² This table generally illustrates the significance of construction materials and labor in the price of housing, which are passed on to the occupant through the sale or rental price of the unit.

To mitigate increasing construction costs, this Housing Element includes programs for the City to consider additional incentives (such as increased density beyond State Density Bonus law) to promote economies of scale.

OTHER DEVELOPMENT CONSIDERATIONS

In addition to the supply of land and construction costs, developers who participated in the outreach process indicated that lender-imposed requirements and/or other requirements based on funding sources act as constraints to development. For example, developers indicated that in addition to parking standards prescribed per the local zoning code, lenders impose parking requirements, as well. Thus, while a city may reduce parking standards and anticipate higher density development as a result, developers may still be required to build parking to satisfy lender requirements. Additionally, developers expressed difficulty identifying funding sources to support mixed-income housing. Typical project financing favors market rate units or lower-income units but not always a combination of both. Developers highlighted the need for flexible development regulations and incentives to mitigate these constraints.

After project approval is granted, other factors can delay requests to obtain building permits. Market conditions and higher than anticipated construction costs can create challenges for developers to secure project financing. As a result, such issues can delay construction activities and the timely provision of housing units.

32. U.S. Census Bureau, Highlights of Annual 2019 Characteristics of New Housing, 2019, <https://www.census.gov/construction/charts/highlights.html?> Accessed August 2020

According to the Planning Division, however, projects that exhibit such delays are infrequent.

Requests to develop at densities below the density identified in the site inventory are analyzed in greater in Chapter 4: Housing Resources. During the 5th Housing Element Cycle, 10 multi-family residential/mixed-use projects were developed, summarized in the appendices. These projects were developed between 46% to 176% of the maximum allowable densities. The site inventory assumes a general development yield of 60-65% of the maximum allowable density based on these trends. Of the 10 multi-family residential/mixed-use projects permitted during the 5th Cycle, 4 developed below the 60-65% threshold, 1 developed within the 60-56% threshold, and the remaining 5 developed above the 60-65% threshold. In general, the 60-65% threshold is consistent with the average yield seen in National City.

To the best of its ability, National City has taken into consideration non-governmental constraints, including market constraints, into the site inventory in Chapter 4: Housing Resources by selecting sites with similar characteristics to those that have been developed recently (such as parcel size, location, existing use, and zone). In addition, this Housing Element proposes a Complete Communities Incentives Program to encourage development flexibility and incentivize housing at (or above) maximum allowable densities and supplement the State Density Bonus. Density bonuses for affordable housing, together with incentives and/or concessions, can potentially lower the average cost per dwelling unit and increase the feasibility of affordable units.

HOME LOANS AND FINANCING

The availability of financing affects a person's ability to purchase or improve a home. In 2017, National City residents had applied

for approximately 360 conventional home purchase loans and 314 Government-Backed home purchase loans. Per the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice, one of the highest rates of withdrawn/closed applications was seen in National City, which is also one of the cities with the lowest approval rates. Withdrawn or closed applications can be indicative of a lack of knowledge about the homebuying and lending process.³³ Historically, low numbers of loans have been approved for National City households that have applied for conventional, government backed, refinance, and home improvement loans. The ability to maintain housing can often depend on the ability of households to obtain home improvement loans for repairs and upgrades. The median sale price of new single-family homes sold in 2019 across the U.S. was \$321,500, while the average sale price was \$383,900.³⁴ Programs that assist residents in being granted these types of loans may assist in maintaining the quality of current housing stock and in helping residents purchase affordable housing, especially those who have historically been denied loans due to previous financial or socioeconomic history. Recommendations to address barriers to loans and financing are identified in Appendix A.

2.5.2. GOVERNMENTAL CONSTRAINTS

Government Code Section 65583(a)(6) requires “An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction.”³⁵

33. SANDAG, San Diego Regional Analysis of Impediments to Fair Housing Choice, July 2020

34. U.S. Census Bureau, Highlights of Annual 2019 Characteristics of New Housing, 2019, <https://www.census.gov/construction/charts/highlights.html>, Accessed August 2020

35. Government Code Title 7. Planning and Land Use [65000-66499.58] Division 1. Planning and Zoning [65000 – 66301], Chapter 3. Local Planning [65100 - 65763], Article 10.6. Housing Elements [65580 – 65589.11], 65583.

Table HE-17: New Construction Costs for a Single-Family Home (2019)

Single Family Price and Cost Breakdown		
	Average Lot Size:	22,094
	Average Finished Area:	2,594
I. Sale Price Breakdown	Average	Share of Price
A. Finished Lot Cost (including financing cost)	\$89,540	18.5%
B. Total Construction Cost	\$296,6652	61.1%
C. Financing Cost	\$8,160	1.7%
D. Overhead and General Expenses	\$23,683	4.9%
E. Marketing Cost	\$4,895	1.0%
F. Sales Commission	\$18,105	3.7%
G. Profit	\$44,092	9.1%
Total Sales Price	\$485,128	100.0%
II. Construction Cost Breakdown	Average	Share of Construction Cost
I. Site Work (sum of A to E)	\$18,323	6.2%
A. Building Permit Fees	\$5,086	1.7%
B. Impact Fee	\$3,865	1.3%
C. Water & Sewer Fees Inspections	\$4,319	1.5%
D. Architecture, Engineering	\$4,335	1.5%
E. Other	\$729	0.2%
II. Foundations (sum of F to G)	\$34,850	11.8%
F. Excavation, Foundation, Concrete, Retaining Walls, and Backfill	\$33,511	11.3%
G. Other	\$1,338	0.5%
III. Framing (sum of H to L)	\$51,589	17.4%

Table HE-15: New Construction Costs for a Single-Family Home (2019) (Cont.)

Single Family Price and Cost Breakdown		
II. Construction Cost Breakdown (Cont.)	Average	Share of Construction Cost
H. Framing (including Roof)	\$40,612	13.7%
I. Trusses (if not included above)	\$6,276	2.1%
J. Sheathing (if not included above)	\$3,216	1.1%
K. General Metal, Steel	\$954	0.3%
L. Other	\$530	0.2%
IV. Exterior Finishes (sum of M to P)	\$41,690	14.1%
M. Exterior Wall Finish	\$19,319	6.5%
N. Roofing	\$9,954	3.4%
O. Windows and Doors (including garage door)	\$11,747	4.0%
P. Other	\$671	0.2%
V. Major Systems Rough-ins (sum of Q to T)	\$43,668	14.7%
Q. Plumbing (except features)	\$14,745	5.0%
R. Electrical (except features)	\$13,798	4.7%
S. HVAC	\$14,111	4.8%
T. Other	\$1,013	0.3%
VI. Interior Finishes (sum of U to AE)	\$75,259	25.4%
U. Insulation	\$5,184	1.7%
V. Drywall	\$10,634	3.6%
W. Interior Trims, Doors, and Mirrors	\$10,605	3.6%

Table HE-15: New Construction Costs for a Single-Family Home (2019) (Cont.)

Single Family Price and Cost Breakdown		
II. Construction Cost Breakdown (Cont.)	Average	Share of Construction Cost
X. Painting	\$8,254	2.8%
Y. Lighting	\$3,437	1.2%
Z. Cabinets, Countertops	\$13,540	4.6%
AA. Appliances	\$4,710	1.6%
AB. Flooring	\$11,998	4.0%
AC. Plumbing Fixtures	\$4,108	1.4%
AD. Fireplace	\$1,867	0.6%
AF. Other	\$923	0.3%
VII. Final Steps (sum of AF to AJ)	\$20,116	6.8%
AF. Landscaping	\$6,506	2.2%
AG. Outdoor Structures (deck, patio, porches)	\$3,547	1.2%
AH. Driveway	\$6,674	2.2%
AI. Clean-Up	\$2,988	1.0%
AJ. Other	\$402	0.1%
VIII. Other	\$11,156	3.8%
Total	\$296,652	100.0%
<p>Source: National Association of Home Builders (NAHB), Cost of Constructing a Home: Special Studies - 2019 Construction Cost Survey, (February 3, 2020), https://www.nahbclassic.org/generic.aspx?genericContentID=260013#:~:text=Construction%20Cost%20survey-,Construction%20Costs,is%20%24237%2C760%20(Table%203).</p> <p>*Note: These results are national averages; the survey sample is not large enough for a geographic breakdown. Building practices, the cost of labor, the cost of land, and to some extent the cost of materials can vary from place to place and depend on the nature of the particular home being built. Although the survey can provide a broad idea of construction costs for the average new single-family home, it is not a perfect tool for estimating costs for a particular house.</p>		

Actions the City can take to impact the pricing, adequacy, and availability of housing include reducing costs and constraints associated with land use controls, site improvement requirements, building codes, fees, and other programs.

LAND USE CONTROLS

The City of National City controls the type, location, density, scale, and character of residential development in land use and zoning codes found in the municipal code, General Plan, and specific plans. These materials, including the officially adopted zoning map illustrating the applicable zoning district for each parcel within the City, are publicly accessible via National City's website <https://www.nationalcityca.gov>.

The Land Use Element of the General Plan and corresponding specific plans and zoning districts provide for a full range of residential and mixed-use types and densities throughout the city. The specific plans have significantly increased the potential residential capacity beyond that of the previous plans and have effectively reduced governmental constraints to housing development in the area of land use controls.

National City's lack of vacant land is the primary constraint to accommodating future growth; however, under-developed sites (especially in the specific plan areas, mixed-use zones, and higher density residential zones) offer opportunities for redevelopment at higher densities to increase the supply of housing.

RESIDENTIAL DEVELOPMENT STANDARDS & ZONING

Existing development standards in National City allow for higher density development, but vacant land available for new multifamily developments is uncommon due to the developed state of the City. A majority of the city is composed of single-family residences, and existing development standards no longer provide opportunities

for these types of buildings to be built in large quantities due to a decrease in land availability.

The City's residential standards impact housing costs and affordability through lot coverage requirements, building height limitation, densities, and other requirements. Over the last decade, development standards have been changed to increase accessibility to higher density development to attract development of residential units.

The zoning districts that allow single and multi-family residential development in the City of National City include:³⁶

- » **Large Lot Residential (RS-1).** The purpose of the RS-1 zone is to provide for areas of single-family detached residences on large lots (ten thousand square feet minimum and a density of up to five dwelling units per acre).
- » **Small Lot Residential (RS-2).** The purpose of the RS-2 zone is to provide for areas of single-family detached residences on small lots (five thousand square feet minimum and a density of six to nine dwelling units per acre).
- » **Medium-Low Density Residential (RS-3).** The purpose of the RS-3 zone is to provide for low-rise, medium-low density (10 to 15 units per acre) single-family attached and multiple family residential areas. The RS-3 zone is intended to retain characteristics found in the single-family zones, such as private yards and patios and privately maintained open space.
- » **Residential Single-Family (RS-4).** The purposes of the RS-4 zone are to provide for areas of single-family attached and detached homes on minimum lot sizes of two thousand five hundred square feet; and to provide for small lot single-family development within the Westside Specific Plan area. The RS-4 zone permits one attached or detached single-family dwelling for each full two

36. National City, Municipal Code, Chapter 18.21 Residential Zones, Section 18.21.010 Purpose

thousand five hundred square feet of lot area provided there is no more than one single-family residence for each two thousand five hundred square feet of lot area. It also allows for the continuation of the existing mixture of housing types and encourages infill with single-family zones on vacant properties and where existing parcels may be further subdivided as provided herein.

- » **Medium Density Multi-Unit Residential (RM-1).** The purpose of the RM-1 zone is to provide for low-rise, medium density (sixteen to twenty-three dwelling units per acre) multiple family residential areas. The RM-1 zone is a transitional zone between higher density residential uses and lesser intensity single-family areas.
- » **High Density Multi-Unit Residential (RM-2).** The purpose of the RM-2 zone is to provide for low- to mid-rise, high density (twenty-four to forty-eight dwelling units per acre) multiple family residential.
- » **Very High Density Multi-Unit Residential (RM-3).** The purpose of the RM-3 zone is to provide for mid- to high-rise, very high density (forty-nine to seventy-five dwelling units per acre) multiple family residential.

Zoning regulations and development standards for these and other districts are detailed in Title 18 - Zoning of the City's Municipal Code, which is publicly accessible via National City's official website <https://www.nationalcityca.gov/>. Key development standards that affect residential development are summarized in Table HE-17 and Table HE-18.

Heights are relative to the existing land uses and developments within National City, and there are currently no open space requirements for single-family residential zones. Open space shall be provided for the exclusive use of the occupants of a multi-unit residential building of three or more units based on the standards within Section 18.41.040, where common usable open space shall be required in a minimum amount of three hundred square feet per dwelling unit; private open

space substitution development standards are also included in Section 18.41.040. Unit sizes are dictated on the minimum lot sizes and maximum density requirements for each of the zones and the 75% minimum lot coverage requirement.

These development standards may necessitate the addition of housing programs that will assist in developing homes on lots that are smaller than the required development standards listed above, assist in easing the process of developing accessory dwelling structures, and assist in lot consolidation to improve the number of sites that can be developed in housing.

OFF-STREET PARKING REQUIREMENTS

Parking requirements can impact the affordability of developing residential units through the use of expensive land for an off-site parking spot, the cost of which is rolled into the overall costs of the residential development. Parking requirements also decrease the amount of space that would otherwise be available for development into a habitable space.

The City's off-street parking requirements are based on land use and zoning requirements. A list of parking requirements in the Municipal Code are shown in Table HE-17. Section 18.45.080 of the Municipal Code includes options for development projects to satisfy the off-street parking requirements, including:

- » The Planning Commission has the quasi-judicial authority to approve a reduction in the amount of off-street parking spaces that would otherwise be required by National City zoning laws, subject to the following considerations:
 - » Project applicants must demonstrate to the Planning Commission that a reduction in spaces would not negatively affect the surrounding areas, and that the parking spaces are

Table HE-18: Residential Development Standards

Development	Requirement by Zoning District						
	RS-1	RS-2	RS-3	RS-4	RM-1	RM-2	RM-3
Minimum setbacks, Primary structure							
Front	20'	20'	15'	10' / 15'(a)	15'	10'	10'
Side—Interior	5'	5'	5'	3/0(b)	5'	5'	5'
Side—Exterior	10'	10'	5'	10'(a)	5'	5'	10'
Rear	25'	25'	10'	15'	5'	5'	5'
Minimum setbacks, Accessory structure							
Front	20'	20'	15'	10/ 15'(c)	15'	10'	10'
Side—Interior	5'	5'	5'	3'	5'	5'	5'
Side—Corner	5'	5'	5'	10'	5'	5'	5'
Rear	5'	5'	5'	3'	5'	5'	5'
Detached building separation	5'	5'	5'	6'	5'	5'	5'
Number of detached buildings	3 per full 5,000 ft ² of lot area	3 per full 5,000 ft ² of lot area	3 per full 5,000 ft ² of lot area	3			
Minimum lot area	10,000 SF	5,000 SF	5,000 SF	2,500 SF	5,000 SF	5,000 SF	5,000 SF
Minimum street frontage (Standard)	60'	50'	50'	25'	50'	50'	50'
Minimum street frontage (lots on the bulb of a cul-de-sac)	36'	36'	36'	15'	36'	36'	36'
Maximum density	One du per lot	One du per lot	One du per 2,900 SF of lot area	One du for each 2,500 SF of lot area	One du per 1,900 SF of lot area	One du per 900 SF of lot area	One du per 580 SF of lot area
Minimum usable open space	N/A	N/A	N/A	N/A	See Section 18.41.040		
Maximum lot coverage	75%	75%	75%	N/A	75%	75%	75%

Table HE-16: Residential Development Standards (Cont.)

Development	Requirement by Zoning District						
	RS-1	RS-2	RS-3	RS-4	RM-1	RM-2	RM-3
Maximum height, primary structure	35'	35'	35'	35'	45'	65'	95'
Maximum stories, primary structure	2	2	3	3	4	6	9
Maximum height, accessory structure	35'	35'	35'	35'	45'	65'	95'
	Shall not exceed the number of stories or height of the primary structure.			Shall not exceed the allowed maximum height of accessory structures in adjacent zone within 100-feet of the adjacent zone.			
Maximum area (total), accessory structures—Excluding up to 400 SF of covered parking	10% of lot size (d)	10% of lot size (d)	10% of lot size (d)	None	None	None	None
Source: National City, Municipal Code, Section 18.21.040 Development Standards, Table 18.21.040 Development Standards Residential Zones, Access May 2020							

not necessary to the development.

- » One factor the Planning Commission considers in requests for reducing off-street parking requirements is proximity to transit. Project applicants must demonstrate that a reduced number of parking spaces is feasible based on projected parking demand around transit hubs. A quarter-mile radius defines acceptable proximity in order to ensure that transit hubs are within a reasonable walking distance from the development. The transit hubs must already exist or will exist by the completion of the proposed project.

Parking requirements in Downtown National City are guided by the Downtown Specific Plan, which recommends such requirements as reducing parking ratios through a bonus system that assures the implementation of parking demand management programs that will result in a lower demand for parking and the ability to negotiate off-street shared parking agreements for developments in the specific plan area.

COASTAL ZONE

The Coastal Zone is generally bounded by San Diego Bay to the west, U.S. Navy facilities to the north, the marine terminal and San Diego Unified Port District to the south, and the Interstate 5 freeway on the east with a small portion east of I-5, south of 30th Street, and bordering Sweetwater River. The total area of the coastal zone in National City is 2,389 acres.³⁷ The area contains warehouses and industrial uses related to the marine terminal, as well as railroad and trolley lines, commercial uses, and wetlands. There is almost no residentially zoned land within the Coastal Zone, except for a small portion along Bay Marina Drive, due to the proximity of both port and military activities. However, there are a few remaining residential structures constructed years ago.

37. SanGIS 2018 Coastal Zones Layer.

Pursuant to State law, a jurisdiction must maintain records of affordable housing in the Coastal Zone. Government Code Section 65588(d) requires the review of the housing element for jurisdictions located within a coastal zone to provide an additional analysis of units constructed, demolished and replaced within three miles of a coastal zone to ensure the affordable housing stock with the coastal zone is being protected and provided as required by Government Code Section 65590. Specifically, demolition of housing units previously occupied by low- and moderate-income households must be replaced. However, several exceptions apply:

- » The conversion or demolition of a residential structure that contains fewer than three dwelling units, or, in the event that a proposed conversion or demolition involves more than one residential structure, the conversion or demolition of 10 or fewer dwelling units.



Table HE-19: Off-Street Parking Requirements for Residential Uses – City Wide

Residential Uses	Minimum Parking Spaces Required
Dwelling, single detached (RS-1 zone)	2 covered spaces, plus one additional uncovered space per bedroom greater than four bedrooms or one additional uncovered space for dwellings greater than 2,500 SF, whichever is greater.
Dwelling, single detached (all other RS and RM zones, except within the Westside Specific Plan area)	One covered space and one uncovered space, plus one additional uncovered space per bedroom greater than four bedrooms or one additional uncovered space for dwellings greater than 2,500 SF, whichever is greater.
Dwelling, single attached	1.5 spaces per dwelling unit in a garage or carport
Dwelling, multiple	1.3 spaces per 1-bedroom dwelling unit plus 1.5 spaces per 2-bedroom or more unit, and conveniently located guest parking of 1/2 space per unit for 20 units or less, plus 1/4 space for each unit over 20. Half of the required guest parking spaces may include parking spaces on dedicated public streets along the sides of the streets that are adjacent to the site.
Mobile home parks	2 spaces per unit
Senior housing	1 space per unit plus 1 guest space for each 10 units
RS-4 (Westside Specific Plan): Units greater than 1,200 square feet	2 spaces per unit
RS-4 (Westside Specific Plan): Units less than 1,200 square feet	1.7 spaces per unit
Mixed-Uses in the MXD and MXC Zones	
Residential - studio, 1 bedroom, and 2 bedroom units	Minimum: 1 space per unit
Residential - 3 or more bedroom units	Minimum: 1.5 spaces per unit
MCR Zones in the Westside Specific Plan	
Residential units greater than 1200 square feet	1.5 spaces per unit
Residential units less than 1200 square feet	1 space per unit
SOURCE: NATIONAL CITY, MUNICIPAL CODE, 18.45.050 - OFF-STREET PARKING REQUIREMENTS BY LAND USE.	

- » The conversion or demolition of a residential structure for purposes of a nonresidential use which is either “coastal dependent” or “coastal related” uses such as visitor-serving commercial or recreational facilities, coastal-dependent industry, or boating or harbor facilities.
- » The conversion or demolition of a residential structure located within the jurisdiction that has less than 50 acres of vacant, privately owned land available for residential use within the coastal zone or three miles from the coastal zone.
- » The conversion or demolition of a residential structure located within the jurisdiction, where a procedure has been established to allow an applicant for conversion or demolition to pay an in-lieu fee for affordable housing development.

State law also designates jurisdictions as exempt from coastal zone affordable housing development requirements if the total coastal zone area has less than 50 acres of land, in aggregate, available for residential use. National City has approximately 12.9 acres of vacant land potentially suitable for housing development and is thus exempt from this requirement.³⁸

BUILDING CODE

The City has adopted the 2019 Edition of the California Building Code which governs the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, use, height, area, fire resistance and maintenance of all buildings and/or structures. The code is considered to be the minimum necessary to protect public health, safety, and welfare and mandated by the State of California.

The City has adopted the 2019 California Building Code mainly as the state has published it. Minor amendments have been added

to provide additional clarification on some of the regarding code requirements, such as:

- » Defining “existing building” as a building erected prior to the adoption of the 2019 California Building Code, or one for which a legal building permit has been issued. If more than fifty-percent of all exterior walls are removed as part of a project, the building is not an existing building.
- » Clarifying right of entry when necessary to make an inspection to enforce any of the provisions of the code, or when the Authority Having Jurisdiction has reasonable cause to believe that there exists a condition that makes such building or premises unsafe, dangerous, or hazardous.



³⁸. SanGIS 2021 Current Land Use Layer.

- » Exemptions from building permits, such as playground, gymnastic and similar equipment related to Group R (residential) structures.
- » Clarifications regarding repairs exempt from permit requirements that only involve the replacement of component parts or existing work completed with similar materials only for the purpose of maintenance and do not affect any structural components or plumbing, mechanical or electrical installations. Specific exemptions include painting and decorating, installation of floor coverings, cabinet work, and outside paving on private property not within the public right-of-way.
- » Clarification that every permit issued by the Authority Having Jurisdiction shall expire by limitation and become null and void if the building or work authorized by such permit is not commenced within prescribed timeframes and the process for renewal if a permit expires.

These amendments do not impose new construction standards that increase the cost of housing³⁹ beyond what is required by the 2019 California Building Code. Amendments are clerical in nature and necessary for the local administration of the building code. They do not impose a constraint to housing development.

This Housing Element contains a program for the City to amend the Municipal and Building Codes to be consistent with all the housing legislations that has passed during the 5th Housing Element Cycle. This will help to expedite a variety of housing types, incentivize affordable housing, and ease the process to approve housing.

The National City Building Department reviews building permit applications for conformance with the applicable regulations. The process for submitting and application is outlined in the City's Municipal Code and summarized on National City's official website

39. April 8, 2021 Correspondance with National City Building Official.



<https://www.nationalcityca.gov/>. Review timelines can vary based on the scale and complexity of the project, but typically the first round of plan review is completed within 30 days and includes plan reviews by the Building, Fire, Planning and the Engineering Departments. Subsequent plan submittals (plan corrections) are typically completed within turned 15 days.⁴⁰

REASONABLE ACCOMODATIONS FOR PERSONS WITH DISABILITIES

As a part of prior Housing Element cycles, National City has adopted revisions to its Zoning Code to remove constraints for housing and housing-related improvements for persons with disabilities:

- » The Zoning Code was amended in 2011 to remove the definition of “family.” The City does not have any adopted definitions or standards that limit the number of and differentiates between related and unrelated individuals living together.
- » Wheelchair ramps and other accessory structures are permitted within all residential zones as incidental structures related to a residence.

Building procedures within the City are also required to conform to the 2019 California Building Code as adopted in Title 15 of the National City Municipal Code. Standards within the Code include provisions to ensure accessibility for persons with physical and sensory disabilities and are designed to comply with the requirements of the Americans with Disabilities Act (ADA) and State statutes.

Zoning and building codes, and the City’s approach to code enforcement, allow for special features that meet the needs of persons with disabilities without the need for zoning variances. City staff is available to provide assistance regarding the procedures for special

accommodations under the City’s Land Use Code. The Building Department staff is familiar with ADA requirements and accessibility standards and is available to review request for accommodation for persons with disabilities and special housing needs.

HOUSING INSPECTION AND CODE ENFORCEMENT

National City has adopted a Property Conservation and Community Appearance Code to provide for the systematic and orderly regulation of activities affecting the usefulness, quality appearance, and living environment of the community. The Property Conservation and Community Appearance Code serves to preserve and enhance residential neighborhoods and establishes procedures to minimize or eliminate blight and adverse threats to the public health, safety, and welfare caused by improper maintenance of abandoned or vacant structures, and to establish penalties and enforcement mechanisms to bring such properties into compliance.

The City has an active Housing Inspection Program which handles approximately 120 housing inspection cases a year. The Program addresses, through a public complaint response process which includes a publicly accessible web-based application called National City Connect, housing quality issues related to violations of the Housing and Safety Code which threaten occupant life safety, structural integrity and sustainability of the housing stock, and environmental and economic viability of surrounding parcels and neighborhoods. The focus of the Program is to provide a timely response to public complaints from tenants and/or other impacted parties. Housing inspectors also proactively respond to outward visual signs of Health and Safety Code violations that are recognized while they are in the field. Follow-up inspections, as per existing ordinance guidance, will insure that the code violations are remedied. A wide majority of the housing cases are at properties over 40 years old, with many much older. Due to the overall age of the housing stock in National City,

40. April 8, 2021 Correspondance with National City Building Official.

the housing and code inspectors witness deferred maintenance of roofing and structural members, flooring, plumbing, and outdated electrical systems that cannot handle the load of modern appliances.

The City is also actively monitoring the availability of grants provided periodically by the Lead Hazard Control and Healthy Homes Program



under the U.S. Department of Housing and Urban Development. Partnering non-profit organizations that work in National City have communicated interest in applying for the grants in collaboration with the City. The grants would provide substantial funding for physical inspections, assessments of housing unit conditions, repair recommendations, funding for imminent repairs, installation of updated appliances and weatherization components, and clinical assessments of household members when their health is impacted by lead-based paint and other health hazards.

Housing inspection and code enforcement activities are necessary for the public health, safety, and welfare of National City residents and are important tools to maintain the quality of the city's housing stock. These activities do not unduly constrain housing development.

DEVELOPMENT AND PLANNING FEES

The City charges permit processing fees (i.e. service fees) and development impact fees (DIF) for the development of roads, parks, etc., while the school district charges school fees.

National City conducted a recent update to its fee schedule, and revised fees have been effective as of July 2019. The revised schedule is publicly accessible via National City's official website <https://www.nationalcityca.gov>. Table HE-20 summarizes the City's planning fees, which are charged based on the type of planning or zoning activity taking place (General Plan Amendment, Specific Plan, etc.). Table HE-21 summarizes the City's building permit fees, which are charged for residential projects based on housing type and square footage.

Impact fees are also charged to provide infrastructure and services to support new development. The Transportation Development Impact Fee (TDIF) is \$2,584 per residential unit. Other impact fees charged by National City for parks and recreation, library, fire/EMS, and

police services total between \$1,475 to \$1,190 per residential unit. In addition to National City's fees, school fees are charged by the Sweetwater Union High School District and National School District that total approximately \$5.28 per s.f. of development. Table HE-22 provides a summary of impact fees.

While impact fees provide an importance resource to mitigate the impacts of development on infrastructure and services, The cumulative amount of the fees (planning, building, and transportation development impact) may constrain housing development and rehabilitation and limit market rate affordability due to the cost increase for each housing unit. As shown in Table HE-23, National City's fees are among the lowest in the San Diego region. They are substantially lower than neighboring jurisdictions such as the cities of San Diego and Chula Vista.

Development impact and permit processing fees are necessary for the City to continue to administer programs and support providing development services and ensure the health, safety, and welfare of its residents. In addition, fees are subject to the procedural and nexus requirements of State law. The City's fee schedule is based on a relatively recent fee study that was completed in 2018 and comprehensively reviewed over 300 city fees. Overall, fees charged by National City do not constrain housing development.

ON- AND OFF-SITE IMPROVEMENTS

National City is predominantly built out and served by existing infrastructure. Requirements for on- and off-site improvements can vary based on the design and context of the proposed development project.

For projects that undergo ministerial review and approval, site improvements are determined as a part of the development review

process and building permit issuance. Site improvements must be provided by the developer in accordance with the applicable sections of the Land Use Code, General Plan, and any specific plans adopted by the City. Typical on-site improvements include:

- » Grading, drainage, and stormwater improvements in accordance with the City's Grading Ordinance;
- » Connections for wet and dry utilities in accordance with Title 14 of the Municipal Code;
- » Common usable open space of 300 s.f. per unit (for projects of three units or more units) in accordance with Title 18 of the Municipal Code; and
- » Landscaping location and plant material requirements (except for lots with zero setback requirements) in accordance with Title 18 of the Municipal Code.

Off-site improvements are generally addressed through the impact fees discussed in the previous section.

A residential development that includes a major subdivision (five or more lots) is a discretionary action that requires a recommendation of the Planning Commission and final approval from the City Council. If a multi-family housing development is proposed as a condominium project, the approval process also includes a subdivision map. For these types of projects, the City requires the construction of reasonable on- and off-site improvements pursuant to the Subdivision Map Act. Improvements must also be in accordance with the applicable sections of the Land Use Code, General Plan, Subdivision Ordinance, and any specific plans adopted by the City. At a minimum, on- and off-site improvements required of the developer typically include:

- » Grading and improvement of public and private streets and alleys, including surfacing, curbs, gutters, cross gutters, sidewalks, ornamental street lighting, and safety devices.
- » Sufficient storm drainage and flood control facilities to carry storm

Table HE-20: National City Fee Schedule - Planning
(Effective July 2019)

Fee Type	Fee
Development	
Annexation	\$4,500.00
Coastal Development Permit (with- out Public Hearing)	\$750.00
Coastal Development Permit (with Public Hearing)	\$3,350.00
Code Amendment	\$5,500.00
Conditional Use Permit (CUP)	\$3,700.00
Consistency Review	\$3,700.00
General Plan Amendment	\$5,500.00
Initial Study	\$1,100.00
Local Coastal Program (LCP) Amendment	\$5,500.00
Minor Use Permit	\$650.00
Planned Development Permit (PD)	\$3,700.00
Preliminary Site Plan Review (per review)	\$600.00
Request to Initiative General Plan/ Specific Plan/Zoning Amendment	\$1,000.00
Specific Plan	\$6,650.00
Specific Plan Amendment	\$5,500.00
Substantial Conformance - Staff Review	\$500.00
Substantial Conformance - Council, Commission	\$750.00
Time Extension without Public Hear- ing (CUP, PD, Variance)	\$400.00
Time Extension with Public Hearing (CUP, PD, Variance)	\$1,100.00

Table HE-19: National City Fee Schedule - Planning (Cont.)
(Effective July 2019)

Fee Type	Fee
Variance	\$3,700.00
Zone Map Change	\$5,500.00
Subdivision	
Certificate of Compliance	\$800.00
Lot Merger	\$600.00
Street Vacation	\$4,000.00
Street Vacation Initiation	\$1,000.00
Tentative Parcel Map	\$3,000.00
Tentative Subdivision Map	\$4,000.00
Time Extension, Tentative Parcel Map	\$1,000.00
Time Extension, Tentative Subdivi- sion Map	\$1,000.00
Note: This table reflects selected fee types and fees. For a full listing, please see the full 2019 user fee table. https://www.nationalcityca.gov/home/showpublisheddocument?id=22590	
Source: National City, 2019 User Fee Schedule, July 2019 ; National City, Building Permits, Web- page, Accessed 4/15/2021 https://www.nationalcityca.gov/government/community-development/building/building-permits#a2	

Table HE-21: National City Fee Schedule - Building
(Effective July 2019)

Fee Type	Fee
Administrative	
Permit filing fee and Building division Plan fee	\$15.00
Permit Issuance	\$45.00 each
Construction & Demolition Admin fee	\$118.00 flat or each
Garage (Residential)	
Garage (attached/detached)	\$622.00 up to 750 sq. ft.
Insulation	\$207.00 each unit
Patio Cover	\$584.00 to \$685.00 per 300 sq. ft.
Photovoltaic System	\$378.00 each
Pile Foundation	
Cast in place concrete (first 10 piles)-	\$548.00 (1-10)
Driven (steel, pre-stressed concrete)	\$563.00 (1-10)
Pre-Plan Check Appointments	\$177.00 first hour, \$88.00 each additional ½ hour
Remodel - Residential	
500 sq. ft.	\$748.00
Additional Remodel	\$43.00 per 100 sq. ft. or portion thereof
Re-roof	
Tile/Shake – first 500 sq. ft.	\$240.00
Comp/Metal – first 500 sq. ft.	\$240.00
Roof Structure Replacement	\$648.00 first 500 sq. ft.
Room Addition	
Up to 500 sq. ft. – First Story	\$864.00
Up to 500 sq. ft. - Multistory	\$1,165.00

Table HE-20: National City Fee Schedule - Building (Cont.)
(Effective July 2019)

Fee Type	Fee
Duplication of Building Plans	\$98.73 each
Certificate of Occupancy	\$60.00 each
Temporary Certificate of Occupancy	\$187.00 each
Change of Contractor/Architect or Owner	\$128.00 each
Product Review	\$82.00 each
Supplemental Plan Check/Plan Change	\$154.86/hr.
Modular Structures	\$722.00 each
R-2 Residential – Permanent 2+ Dwellings (Apartment Dormitory, Time-share)	
Plan Check	\$2,009.79 - \$49,997.67 (1,000 – 100,000 sq. ft.)
Inspection Check	\$2,649.92 - \$15,658.72 (1,000 – 100,000 sq. ft.)
R-3 Dwellings – Custom Homes	
Plan Check	\$2,965.22 - \$11,982.68 (1,500 – 10,000 sq. ft.)
Inspection Check	\$2,492.27 - \$5,445.54 (1,500 – 10,000 sq. ft.)
R-4 Residential – Assisted Living (6-16 persons)	
Plan Check	\$2,126.34 - \$56,717.33 (1,000 – 100,000 sq. ft.)
Inspection Check	\$2,274.48 - \$20,972.16 (1,000 – 100,000 sq. ft.)
Note: This table reflects selected fee types and fees. For a full listing, please see the full 2019 user fee table. https://www.nationalcityca.gov/home/showpublisheddocument?id=22590	
Source: National City, 2019 User Fee Schedule, July 2019 ; National City, Building Permits, Web-page, Accessed 12/29/2020 https://www.nationalcityca.gov/government/community-development/building/building-permits#a2	

Table HE-22: National City - Development Impact Fee Schedule

Fee Type	Fee	
	Single Family	Multifamily (4 or greater)
Facility Impact Fee¹		
Parks & Recreation	\$858.00 per unit	\$692.00 per unit
Library	\$172.00 per unit	\$139.00 per unit
Fire/EMS	\$126.00 per unit	\$102.00 per unit
Police	\$318.00 per unit	\$257.00 per unit
Transportation Impact Fee²		
Transportation Development Impact Fee (TDIF)	\$2,584.00 per unit	
School Impact Fee		
National School District ³	\$1.41 per sq. ft.	
Sweetwater Union High School District ⁴	\$3.87 per sq. ft.	
<p>1 - National City Impact Fee Schedule, Accessed 4/15/2021 https://www.nationalcityca.gov/home/showpublisheddocument?id=25786</p> <p>2 - National City Transportation Development Impact Fees, Accessed 4/15/2021 https://www.nationalcityca.gov/home/showpublisheddocument?id=25776</p> <p>3 - National School District. E. Sanchez, personal communication, 4/20/2021.</p> <p>4 - Sweetwater Union High School District Developer Fees, Accessed 4/15/2021 http://finance.sweetwaterschools.org/developer-fees/</p>		

Table HE-23: Fee Comparison for San Diego County Jurisdictions

Jurisdiction	Single Family	Townhome (Type V Construction)	Condominium (Type III Construction)	Apartment (Type V Construction)
Carlsbad	\$42,616.78	\$23,012.02	\$17,086.21	\$16,762.04
Chula Vista	\$57,167.97	\$42,481.32	\$38,577.18	\$38,596.86
Encinitas	\$22,932.15	\$15,984.48	--	\$15,233.65
Escondido	\$37,044.15	\$31,185.86	\$29,360.35	\$29,360.35
Imperial Beach	\$15,161.22	\$11,262.71	\$9,832.14	\$21,010.37
La Mesa	\$27,442.49	\$19,242.63	\$14,248.72	\$12,906.75
Lemon Grove	\$13,563.65	\$6,259.63	\$4,870.52	\$5,106.55
National City	\$15,025.99	\$5,655.93	\$4,175.54	\$4,175.54
Oceanside	\$68,235.30	\$25,089.74	\$17,254.33	\$17,178.01
Poway	\$26,528.05	\$21,194.22	\$2,059.13	\$20,898.17
San Diego	\$155,367.00	\$103,121.73	\$95,731.81	\$97,461.70
San Marcos	\$30,761.34	\$25,588.10	\$23,410.80	\$14,184.14
Santee	\$31,313.31	\$35,083.03	\$707.96	\$1,892.94
San Diego County	\$21,797.00	\$12,793.00	\$10,900.00	\$11,156.00
Vista	\$27,546.37	\$20,804.79	\$23,176.90	\$18,608.86
Source: BIA 2019-2020 Fees Study for San Diego County				



- runoff, both tributary to and originating within the subdivision;
- » Sanitary sewage system serving each lot or unit of the subdivision;
- » Water supply system providing an adequate supply of potable water to each lot and fire hydrants within the subdivision;
- » Fire hydrants and connections;
- » Survey monuments; and
- » Public utility distribution facilities, including gas, electric, and telephone necessary to serve each lot in the subdivision.

More detailed requirements are included in Title 17 of the Municipal Code. The City may also require the dedication of parcels of land intended for public use, including:

- » Streets, highways, alleys, ways, easements, rights-of-way, and land intended for public use;
- » Vehicular access rights from any parcel to highways or streets;
- » Private utility easements required by the various utilities;
- » Easements for natural and improved drainage facilities; and
- » Area dedicated or reserved for parks, recreational facilities, fire

stations, libraries, or other public uses as deemed necessary by the City.

Dedicated streets, highways, alleys, ways, easements, rights-of-way, etc. must be designed, developed, and improved according to City Standards. Roadways are classified based on the existing and projected traffic need analyzed in the City's General Plan. These roadway classifications include Local (2 lanes), Collector (2+ lanes), and Arterial (4-6 lanes) and are identified in the adopted Circulation Element. Depending on the classification, right-of-way requirements can range from 60 feet to 100 feet with varying curb-to-curb requirements. Private streets as part of developments are considered by the City on a project-by-project basis and must meet the National City Fire Department standards.

While site improvements may add to the cost of developing residential units, they are required for the public health, safety, and welfare of residents and provision of quality housing facilities. Standards for on- and off-site improvements are identified in the Land Use Code, General Plan, and Subdivision Ordinance (if applicable) and do not unduly constrain housing development.

LOCAL PROCESSING AND PERMIT PROCEDURES

Development review and permit processing procedures are necessary steps to ensure that residential construction proceeds in an orderly manner. The following discussion outlines the level of review required for various permits and timelines associated with those reviews. The timelines provided are estimates; actual processing times may vary due to the size and complexity of the projects.

Applications for permits or other land use matters are filed with the National City's Planning Division. Procedures are outlined in Chapter 18.12 Permits and Applications of the Municipal Code.

Developments consistent with the permitted and allowed land uses of Chapter 18.21 are typically processed through ministerial review. Discretionary review typically occurs for determinations that require an exercise of judgement and deliberation, such as a zoning code amendment, as opposed to merely determining that the permit request complies with a set of standards. Discretionary permit applications require review of findings prescribed in the California Environmental Quality Act (CEQA) and ordinances adopted pursuant thereto, in addition to all other requirements by the Planning Commission and/or the City Council, at a public hearing. Appendix B: Review Authority and Allowed Use Tables has been included as a part of this Housing Element to provide more detailed information on the ministerial and discretionary review process. It should be noted that prior to submitting a permit application, an applicant can request a “Pre-Application Conference” with a Planning Department staff member to review and discuss with the applicant the application, fees and time for processing the application. Actual processing time may vary due to the volume of applications and the size and complexity of the project; estimates, however, are provided below.

Single-family dwelling units are permitted within the City’s residential zones. A single-family unit on an existing parcel is subject to a Building Permit to ensure compliance with zoning regulations and the engineering, building, and fire codes. Approval of a Building Permit for a single-family dwelling is a ministerial process approved by staff. Staff involved in the review process include the Building and Safety, Planning, Engineering, and Fire Departments. Processing time is approximately six to eight weeks but is highly dependent on the quality, completeness, and accuracy of the development proposal.

If the proposed single-family project requires a subdivision or varies from the development standard (i.e., variance) it would require a discretionary action that is considered by the Planning Commission.

Approval is based on findings outlined in the zoning regulations and state law. Processing time for a Planning Commission hearing is approximately two months.

Multifamily residential units are permitted within the City’s residential multi-family zones. Multi-family residential uses are also permitted in the City’s mixed use zones, but must include a minimum ten percent of commercial floor area. Multi-family residential projects are subject to a Building Permit to ensure compliance with zoning regulations and the engineering, building, and fire codes. Approval of a Building Permit for a multi-family residential project is a ministerial process approved by staff. Staff involved in the review process include the Building and Safety, Planning, Engineering, and Fire Departments. Processing time is approximately six to eight weeks but is highly dependent on the quality, completeness, and accuracy of the development proposal.

A residential development that includes a major subdivision (five or more lots) requires a recommendation of the Planning Commission. The City Council is the final decision-making body for a major subdivision and provides approval. The basis for approval is the City’s subdivision regulations, the permitted density of the underlying zone and Land Use Code, and consistency with the City’s General Plan. The length of time required to process a subdivision map is variable based on the size and complexity of the project. In most cases, the approval process can be completed in two to four months.

If the multi-family housing is proposed as a condominium project the approval process also includes a subdivision map. Processing time is approximately two to four months, and the project is subject to review by the Planning Commission and the City Council.

A proposed housing project may include a General Plan Amendment and/or Rezone. This type of approval is discretionary, requiring a

recommendation by the Planning Commission and final approval by the City Council. The timeline for approving a General Plan Amendment and/or Rezone is variable and depends on the applicant's ability to show that the proposal would further the City's established land use goals and complete the requisite analyses under CEQA.

Existing and new development are subject to General Design and Development Regulations that are identified in Chapter 18.40 of the Municipal Code. This section includes guidelines and standards for site planning, building design, fences and walls, landscaping, off-street parking and loading, outdoor lighting, and signage that are intended to be considered in combination with applicable zoning regulations and development standards. These design guidelines do not prescribe any particular style of architecture. Most of the current parameters included in this section are requirements for designing common usable open space, projections, pedestrian walkways, and other parameters. Specific plans such as the Downtown Specific Plan and Westside Specific Plan have their own design guidelines, as well. Design review is integrated into the development review process; however, adopting objective standards can assist with expediting review timeframes and minimize subjective judgement.

Senate Bill (SB) 35 requires jurisdictions that have not made sufficient progress toward their Above- Moderate income RHNA to establish a streamlined review process for qualifying multifamily infill projects. National City is subject to provide streamlined development review and processing for proposed developments with at least 10% affordability. Currently, the City has not adopted any locally specific procedures; one of the recommended programs of this Housing Element is to adopt eligibility criteria and a checklist for applicants to request streamlined approval. Another recommended program in this Housing Element is the development of Objective Design Standards for the purpose of streamlining review procedures.

PROVISIONS FOR A VARIETY OF HOUSING TYPES

A jurisdiction must identify adequate sites made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels, including multi-family rental housing, factory built housing and mobile homes, accessory dwelling units, emergency shelters, transitional housing, and supportive housing, among others.

Currently, the intent of Chapter 14.48 Municipal Code Section 18.48.0.101 is to implement the policies of the General Plan's Housing Element for developing affordable housing for households with very-low, low, and moderate incomes.

In Chapter 18.24 Municipal Code Section 18.24.010, the Code describes the purpose of mixed-use corridors and district zones as an opportunity to create vibrant, mixed-use places that support a dynamic economy, affordable housing and environmental sustainability along major roadways. These mixed-use corridors (MXC), are meant to support an environment for such developments as multi-family residential and mixed-use buildings to provide a diversity of housing choices for existing and new residents. Building standards and placements have been revised accordingly within these zones to improve the accessibility of developing more affordable residential units. Both specific plans also provide zoning for a variety of types of housing developments.

ACCESSORY DWELLING UNITS

The Municipal Code does not reflect the current Accessory Dwelling Unit (ADU) housing laws in the State of California and is recommended to be revised to comply with State law in order to encourage the construction of more ADUs within the city during the 6th Housing Element Cycle. Recent legislation that impacts

ADU development standards and increases the potential affordable housing stock through ADU development includes:

- » AB 3182 (Ting): Owners are not subject to governing documents that prohibit or unreasonably restrict renting or leasing separate interests, ADU's, junior ADU's and includes a requirement for ministerial approval of building permit applications in residential or mixed-use zone to create 1 ADU and 1 junior ADU per lot with proposed or existing single family development if certain conditions met (existing legislation requires approval of 1 ADU or junior ADU).



- » AB 68 (Ting): Expands the definition of ADU and includes a provision that ADUs are not considered to exceed the allowable density for the lot upon which it is located. In addition, ADUs are not subject to local policies, ordinances, or programs that limit growth, and prohibits the adoption of ADU ordinances that impose lot coverage standards and minimum lot size requirements.
- » AB 881 (Bloom): Prohibits setback requirements for an existing living area or accessory structure that is converted to an ADU (or a new structure within the same place and dimensions as an existing structure). For an ADU not converted from an existing structure, setbacks are limited to 4'.
- » SB 13 (Wieckowski): Until January 1, 2025, cities may not condition approval of ADU building permit applications on the applicant being the "owner-applicant" of either the primary dwelling unit or the ADU or impose impact fees on ADUs under 750 square feet. If a local agency does not act on an ADU application within 60 days of a completed application, the application shall be deemed approved.
- » AB 587 (Friedman): ADUs may be sold or conveyed separately from a primary residence if certain conditions are met, such as being developed by a qualified nonprofit corporation. This bill is intended to increase the ability of affordable housing organizations to sell deed-restricted ADUs to eligible low-income homeowners.
- » AB 670 (Friedman): This bill makes unlawful any HOA condition that prohibits or unreasonably restricts the construction of ADUs on single-family residential lots.
- » AB 671 (Friedman): This bill requires the jurisdictions to include plans to incentivize and promote the creation of affordable ADUs in local Housing Elements.
- » SB 1226 (Bates): A building official has the discretion to apply the building standards that were in effect at the time a residential unit

was constructed. If a building permit does not exist, the official may make a determination of when the unit was constructed and issue a retroactive building permit based on the applicable standards of that determination. This bill legalizes previously constructed and unpermitted units, which in exchange must be brought up to code and restricted at an affordable rent to very-low and low-income households.

The City permitted 5 ADUs between 2017 to 2020. Currently, the Municipal Code addresses ADUs as “Second Units” that require ministerial approval. This Housing Element includes goals and policies to promote diverse housing options in National City, including ADUs, and recommends a comprehensive Municipal Code Update to ensure that the requirements of State law are reflected in the City’s regulations. Also recommended in this Housing Element is the adoption of an ADU Ordinance that updates the Municipal Code to:

- » Add definitions for ADUs and Junior ADUs that are consistent with State law.
- » Reflect development standards (unit size, parking, etc.) that are consistent with State law.
- » Establish clear procedures for the ministerial approval of ADUs in all zones that allow residential uses, consistent with State law.

At the time of the drafting of the Housing Element, the City is in the process of developing an ADU ordinance.

EMERGENCY SHELTERS AND LOW BARRIER NAVIGATION CENTERS

Based on the 2020 Point-in-Time Count, National City has an estimated homeless population of 128 persons, including 125 unsheltered homeless. Emergency shelters provide a critical resource for individuals or families experiencing housing instability. Government Code Section 65582(d) defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.” A Low Barrier Navigation Center is defined in Government Code Section 65660 as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.”

Section 18.30.110 of the Municipal Code addresses Emergency Shelters. In compliance with SB 2 (effective as of January 1, 2008), emergency shelters are allowed as a permitted use without the need for a conditional use permit and are exempt from CEQA (California Environmental Quality Act). New facilities are permitted in the light industrial (IL) zone only. The City’s IL zone encompasses an area of 206 parcels totaling approximately 95 acres. Many of these properties are occupied by older industrial uses and warehouses. The IL zone provides adequate capacity to accommodate at least one shelter for the City’s unsheltered homeless. In addition, the IL zone is accessible via public transit, including the 24th Street trolley station and several bus lines. Currently, vehicle parking standards for emergency shelters are calculated based on office space plus one parking space per ten beds. Pursuant to AB 139, the Municipal Code will be amended to

revise parking requirements for emergency shelters based on staffing levels only.

In addition, the Municipal Code does not currently address the provision of Low Barrier Navigation Centers (LBNS). Pursuant to AB 101, the Municipal Code will be amended to establish LBNC development as a use by-right in areas zoned for mixed use and nonresidential zones permitted family uses that meet requirements consistent with State law.

TRANSITIONAL/SUPPORTIVE HOUSING

Transitional housing helps transition an individual or family from a short-term emergency shelter. Government Code Section 65592 (j) defines transitional housing as “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 a predetermined future point in time that shall be no less than six months from the beginning of the assistance.”

Supportive housing is generally described as permanent housing linked to a range of support services. Government Code Section 65582(g) defines supportive housing as “housing with no limit on length of stay, that is occupied by the target population, and that is linked to 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.”

AB 2162 requires supportive housing to be permitted by-right in zones where multifamily and mixed-use development is permitted. AB 2162 further amends Government Code Section 65583 and adds Code Section 65650 to require local entities to streamline the approval

of housing projects containing a minimum amount of supportive housing by providing a ministerial approval process, removing the requirement for CEQA analysis and removing the requirement for Conditional Use Authorization or other similar discretionary entitlements granted by the Planning Commission. Consistent with AB 2162, transitional / supportive housing is currently a permitted use by-right within all of the city’s residential and mixed-use zones and does not require discretionary review. However, the Municipal Code



will be amended to specify that applications to develop transitional / supportive housing will be reviewed within the timeframes specified by State law. In addition, the Municipal Code will be amended to state that minimum parking requirements will not be imposed on transitional / supportive housing that is located within one-half mile of a public transit stop.

GROUP HOMES/RESIDENTIAL CARE FACILITIES

A “Residential care home” means a state authorized, certified, or licensed home serving six or fewer mentally disordered or otherwise handicapped persons or dependent or neglected children, and providing care on a twenty-four-hour-a-day basis, as defined in Section 5116, California Welfare and Institutions Code. Consistent with Government Code Sections 1267.8, 1566.3, and 1568.08, residential care homes of six or less people are permitted by-right in all residential and mixed-use zones.

Residential care facilities serving seven or more people are addressed in the Municipal Code as nursing homes, which are permitted by-right in all residential and mixed-use zones. The Municipal Code defines nursing homes as “the same as ‘long-term health facility.’” Long-term health facilities are defined as “an institution or premises licensed by the state and used for the housing and care of the ambulatory, aged or infirm, and offering or providing lodging, meals, nursing, dietary or other personal services.”

INSTITUTIONAL UNITS/SENIOR CARE FACILITIES

“Institutional units” mean a nursing home, home for the aged, assisted living facility, or similar institutional units. Institutional units are permitted within the Institutional Zone. Allowed uses include retirement communities and similar uses.

FACTORY BUILT HOUSING/MOBILE HOMES

The Mobile Home Park (MHP) Overlay zone provides for mobile home parks, the number of units allowed governed by the State Health and Safety Code Section 18,000 et seq. Mobile homes must be certified according to the National Manufactured Housing Construction and Safety Standards Act of 1974, and cannot have been altered in violation of applicable codes. In addition, manufactured housing installed on a permanent foundation in compliance with all applicable building regulations and Title 25 of the California Health and Safety Code is permitted in all single-family zones.

SINGLE-ROOM OCCUPANCY UNITS

A single-room occupancy (SRO) unit usually is small, between 200 to 350 square feet. These units provide a valuable source of affordable housing for individuals and can serve as an entry point into the housing market for people who previously experienced homelessness. SRO units are not specifically defined in the Zoning Code but are considered a residential use. They are permitted in the National City’s residential and mixed-use zones. Within the single-family residential zone, however, SROs of more than two units are considered “rooming and boarding houses” as defined by the Zoning Code and require a conditional use permit (CUP).

Development standards, such as prescribing a maximum density of one dwelling unit per 580 s.f. of lot area in the RM-3 zone, may create a constraint to SRO implementation and will be evaluated as a part of the Municipal Code Update.

EMPLOYEE HOUSING

The Employee Housing Act establishes zoning and permitting requirements for living quarters provided in conjunction with any work, whether or not rent is involved.

Health and Safety Code Section 17021.5 requires that accommodations for six or fewer employees are determined to be single-family structures subject to a residential land use designation. Employee housing may not be included in the definition of a boarding house, rooming house, hotel, dormitory, or similar term that differs from a family dwelling. No conditional use permit, zoning variance, or other zoning clearing can be required that is not required of a family dwelling of the same type in the same zone.

The Zoning Code does not differentiate between employee housing and residential land uses. Consequently, single-family housing that provides accommodations for employees is permitted by right in all residential and mixed-use zones; multifamily housing that provides accommodations for employees is permitted by right in all multifamily and mixed-use zones. To provide greater clarity, however, the Zoning Code will be amended to define employee housing and indicate that it is an allowed use pursuant to Health and Safety Code Section 17021.5.

Health and Safety Code Sections 1702.6 and 17021.8 relate to agricultural employee housing. Employee housing consisting of no more than 36 beds in group quarters or 12 units are deemed an agricultural use. Applications involving agricultural employee housing that meet certain criteria can also request streamlined, ministerial approval within prescribed timeframes. As previously discussed, National City does not have extensive agricultural uses or operations. Urban agriculture, however, is permitted within National City's residential, mixed use, and open space zones. Currently, no

formal procedures exist for processing agricultural employee housing applications consistent with Health and Safety Code Sections 1702.6 and 17021.8. The Municipal Code will be updated to reference the Employee Housing Act.

AFFORDABLE HOUSING – STATE LAWS IMPACTING LOCAL DEVELOPMENT STANDARDS

Recent legislation that impacts residential development standards and potential affordable housing includes:

- » SB 330 (Skinner): Declares a statewide housing emergency to be in effect until January 1, 2025. To increase the production of housing, the Act: Suspends certain restrictions on the development of new housing during this period of statewide emergency and expedites local government permitting processes and timeframes. The Act applies to all “housing development projects,” with a special emphasis on projects for very-low, low, and moderate income households and emergency shelters.
- » AB 686 (Santiago): The bill places requirements on Housing Elements, and revisions to Housing Elements that occur on and after January 1, 2021, to include an assessment of fair housing within the jurisdiction.
- » AB 2162 (Chiu): Requires that supportive housing be allowed by right in zones where multifamily and mixed uses are permitted, including nonresidential zones that permit multifamily uses. Minimum parking requirements for units occupied by supportive housing residents are prohibited if the development is located within ½ mile of a public transit stop.
- » AB 101: Requires a Low Barrier Navigation Center (LBNC) be a use by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses if it meets specified requirements, including: access to permanent housing, use of a coordinated entry system (i.e. Homeless Management Information System),

and use of Housing First according to Welfare and Institutions Code section 8255. (Gov. Code, § 65662.) A LBNC is defined as a Housing First, low barrier, temporary, service-enriched shelter focused on helping homeless individuals and families to quickly obtain permanent housing. Low barrier includes best practices to reduce barriers to entry, such as allowing partners, pets, storage of personal items, and privacy (Gov. Code, § 65660.).

These laws, passed during the last housing cycle, would revise policies and processes of the City and potentially reduce governmental constraints on housing development. These laws guide the development of recommendations in this update for the 6th cycle, including the amendments to the zoning code.

DENSITY BONUS FOR AFFORDABLE HOUSING

Developers of affordable housing are entitled to a density bonus and/or equivalent concessions or incentives under certain conditions. According to Municipal Code Section 18.48.030, applications for projects meeting the minimum threshold of five units or more, the density bonus provisions set forth in Government Code Section 65915, as amended from time to time, shall apply. “Density bonus” means a density increase of up to thirty-five percent over the otherwise maximum residential density allowable by the applicable zoning designation, pursuant to State Government Code Section 65915, as amended from time to time.

Changes to State Law since the last Housing Element update in 2013 include:

- » AB 1763 (Chiu): If a developer agrees to build a housing development project in which 100% of the total units are affordable for lower income households (which can include up to 20% moderate income households), the project qualifies for an additional density bonus, limited incentives and concessions

under the Density Bonus Law, and additional height increase if located within ½ mile of a major transit stop.

- » AB 1934: Provides a density bonus to a commercial development if the developer enters into an agreement for partnered housing either as a joint project or two separate projects encompassing affordable housing.
- » AB 2222: Eliminates density bonuses and other incentives previously available unless the developer agrees to replace pre-existing affordable units on a one-for-one basis. Increases the required affordability period from 30 years to 55 years for all density bonus units. Furthermore, if the units that qualified an applicant for a density bonus are affordable ownership units, as opposed to rental units, they must be subject to an equity sharing model rather than a resale restriction.
- » AB 2345 (Gonzales): Allows developers to increase their density bonuses — the number of units permissible on any plot of land — to 50%, depending on the number and level of deed-restricted affordable homes on a piece of property. Under existing density bonus law, developers are able to receive up to a maximum of a 35% bonus of allowed density. Additionally, the bill allows local governments to grant additional waivers for projects located within a half-mile of transit and which are 100% affordable, and incentivizes additional density bonus projects by reducing the maximum parking required for certain projects.⁴¹
- » AB 2501: Makes changes to: the timeline for processing application for a density bonus; electing to accept no density increase; and determining the value of concessions and incentives.
- » AB 2556: Clarifies the replacement requirements as established by AB 2222.
- » AB 2442: Requires a density bonus be granted for a housing development if applicant agrees to construct housing for

41. KPBS, Newsom Signs Gonzalez Incentives Bill For Affordable Housing Developers, September 28, 2020, <https://www.kpbs.org/news/2020/sep/28/newsom-signs-gonzalez-incentives-bill-for/>

transitional foster youth, disabled veterans, or homeless person. These new laws guide the recommendations for amending the provisions regarding density bonus within the Municipal Code.

2.5.3. INFRASTRUCTURE CONSTRAINTS

Another factor adding to the cost of new construction is the cost of providing adequate infrastructure: major and local streets; curbs, gutters, and sidewalks; water and sewer lines; and street lighting, all of which are required to be built or installed in new development. In most cases, these improvements are dedicated to the City, which is responsible for their maintenance. The cost of providing these facilities is borne by developers and is added to the cost of new housing units, which is eventually passed on to the homebuyer or property owner.

Because National City is a largely built-out community, an extensive infrastructure system is already in place. However, there are many older parts of the City where public improvements are outdated, substandard, or not fully installed. The costs associated with infrastructure improvements will vary depending on the area in which the development proposal is located. Costs associated with upgrading infrastructure to serve a specific redevelopment project are typically paid by developers.

WATER AND SEWER PRIORITY - SECTION 65589.7

National City is predominantly built out and served by existing infrastructure, including water and sewer systems. Water service is provided by the Sweetwater Authority and sewer service is provided by the City of National City.

The Sweetwater Authority obtains water from four primary sources, which include:

- » Deep freshwater wells within National City;
- » Capture of local runoff in the Sweetwater River with subsequent storage at Loveland Reservoir in Alpine and Sweetwater Reservoir in Sprin Valley;
- » San Diego Formation Wells in the lower Sweetwater River basin; and
- » Purchase of imported water delivered by the San Diego County Water Authority (San Diego CWA) and Metropolitan Water District (MWD).

The Sweetwater Authority's 2015 Urban Water Management Plan (UWMP) is intended to ensure that adequate water supplies are available to meet existing and future demands in Sweetwater's service area. In the past, Sweetwater Authority purchased approximately 56% of its water supplies from the San Diego CWA; however, the agency is planning to implement future projects, such as an expansion of an existing groundwater desalination facility, to increase local water supplies. In the future, imported water will account for approximately 34% of the agency's supply mix.

According to normal water year projections, Sweetwater Authority anticipates having adequate water supplies to meet projected demands through 2040. In the case of single or multiple dry-years, Sweetwater Authority anticipates meeting water demand by purchasing additional supplies through the San Diego CWA and implementing conservation efforts. Based on the analysis in the UMWP, adequate supply is available to accommodate the RHNA during the Housing Element planning period. Pursuant to SB 1087, the City will provide a copy of the adopted Housing Element to Sweetwater Authority within 30 days of adoption. Project-level consultation will continue, as well, to determine adequate water service.

The City of National City provides sewer service to the area generally within its corporate limits and receives inflows from the City of San

Diego and the United States Navy in route to the regional South Metro Interceptor (SMI), which conveys wastewater to the Point Loma Wastewater Treatment Plan. There are nine significant sewer basins within National City that contribute wastewater flow to the City's wastewater collection system. The City is responsible for the maintenance, operations, and management of all sewer collection systems that transport flows generated within the City.

The City's 2011 Sewer System Master Plan (2011) includes a wastewater Capital Improvement Program (CIP) that identifies a prioritized list of projects to continue to ensure reliable and cost-effective service. This list informs the citywide CIP, which undergoes annual review to ensure that the most critical maintenance needs are met. As a result, sewer capacity does not constrain development and the City's ability to accommodate the RHNA during the Housing Element planning period.

The City has adopted policies to ensure full regulatory compliance with State legislation, including SB 1087, and provide priority service for lower-income housing units. Project-level consultation will continue, as well, to determine adequate sewer service.

AB 162 FLOOD HAZARD LAND MANAGEMENT

AB 162 requires the Land Use Element to identify and annually review those areas covered by the General Plan that are subject to flooding as identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the Department of Water Resources. This Bill provides that the determination of available land suitable for urban development may exclude lands where the flood management infrastructure designed to protect the jurisdiction is not adequate to avoid the risk of flooding such that the development of housing would be impractical due to cost or other considerations. In addition, the bill requires, upon the next revision of the housing

element, on or after January 1, 2009, the Conservation Element of the General Plan to identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management. By imposing new duties on local public officials, the bill creates a state-mandated local program.

The City's Land Use Element, Safety Element, and Housing Site Inventory all take into consideration the current infrastructure in place to protect the City from flooding from the Sweetwater River as well as the latest FEMA Federal Insurance Rate Maps (FIRM) that are periodically updated by FEMA with community input. Sites on the Site Inventory guide the development of housing in areas not prone to flooding.

2.5.4. ENVIRONMENTAL CONSTRAINTS

Environmental concerns can constrain housing by limiting developable land availability and increased costs associated with environmental impact mitigation. Since National City is an urbanized city and largely built-out, habitat constraints are minimal. Most sites are located on vacant infill or under-developed lots along existing streets in developed areas of the city; consequently, most available sites are not constrained by environmental factors such as open space, habitat, topography, soils, seismology, and geology. Several sites are located within the flood zones; however, flood control, development, and infrastructure improvements on these sites have eliminated potential flooding hazards for future development.

ENERGY CONSERVATION IN RESIDENTIAL DEVELOPMENT

Per Government Code Section 65583(a)(8), an analysis of opportunities for energy conservation with respect to residential development is required within the housing element. Cities and

counties are encouraged to include weatherization and energy efficiency improvements as part of publicly subsidized housing rehabilitation projects. These may include energy efficiency measures that encompass the building envelope, its heating and cooling systems, and its electrical system. Over the long term, these standards help residential development save in heating and cooling costs and protect the life of a home from the elements, but may present upfront costs during construction that may be passed onto the price of the home.

Per the 2011 Adopted Climate Action Plan (CAP) energy analysis, 58 percent of the total residential emissions were the result of natural gas use, and 42 percent were the result of electricity consumption. Major residential energy uses include heating, refrigeration, lighting and water heating.⁴² National City encourages the conservation of energy in new residential development through Municipal Code 15.75.010 – 2019 California Energy Code, in which all construction of buildings where energy will be utilized shall be in conformance with the 2019 California Energy Code, California Code of Regulations, Title 24, Part 6 Energy Efficiency Standards for Residential and Nonresidential Buildings. Through the Municipal Code allowing solar photovoltaic system installation, and through the 2011 Adopted CAP energy sector measures, National City intends to reduce GHG emissions and energy consumption through conservation, use of energy-efficient technologies and use of renewable energy sources in both existing buildings and new buildings. Such measures include encouraging energy audits at the time of sale of residential properties and providing information about potential upgrades.

In addition, the California Solar Mandate, passed in 2019, is a new building code that requires newly constructed homes to have a solar photovoltaic (PV) system as an electricity source. This Code, which

went into effect on January 1, 2020, applies to both single-family homes and multi-family homes that are up to three stories high.⁴³ This requirement may increase housing development costs in the future and present another constraint to housing development, but would be supportive in helping the City improve its energy efficiency and use of renewable energy sources to reduce greenhouse gas emissions.

National City Municipal Code Section 15.81 Small Residential Rooftop Solar Systems details an expedited, streamlined solar permitting process for the installation of a solar energy system that is installed on a single or duplex family dwelling that complies with the Solar Rights Act and AB 2188 (Chapter 521, Statutes 2014, California Government Code Section 65850.5). National City's intention to provide this expedited permit processing is to achieve timely and cost-effective installations of small residential rooftop solar energy systems. In addition, under Municipal Code section 18.30.300 Solar Energy Systems, solar collectors are permitted outright as an accessory use to any principal use subject to the following standards: Solar collectors are not considered as "reflective roofing materials" and there is no limit to the specific percentage of roof coverage. These codes will be amended to comply with the 2019 Code to include the required housing types.

2.6. CONCLUSION

With consideration of the various housing needs and constraints faced by the community, the City's intention to provide supportive resources and consider implementing actions and programs would reduce barriers to housing development and increase opportunities

43. Energy Sage, An overview of the California solar mandate, November 7, 2019, <https://news.energysage.com/an-overview-of-the-california-solar-mandate/#:~:text=The%20California%20solar%20mandate%20is,up%20to%20three%20stories%20high>.

42. National City, Final Climate Action Plan, May 2011

to fair housing opportunities. These actions will be tracked annually through their Housing Element Annual Progress Report (APR) and annual Consolidated Annual Performance Evaluation Report (CAPER). Through the quantified objectives and milestones set by the programs of this Housing Element, National City will be able to quantitatively track its progress in addressing disparities in housing needs and opportunities, transforming areas into vibrant and opportunity-rich communities, and affirmatively furthering fair housing.



3. PUBLIC PARTICIPATION

The City of National City encourages and values the participation and feedback of its residents, businesses, local agencies, partner nonprofits, developers, and other stakeholders. One of the goals of the first phase of outreach was to gather input on housing-related priorities and strategies to accommodate density.

3.1. OUTREACH SUMMARY

Three public outreach webinars for the General Plan Update were held via virtual platform on August 24, August 27, August 29, and September 9, 2020. The webinars were held on GotoWebinar. They were advertised on the project website as well as the City's social media pages and website calendar. The webinars were also promoted via the City's constant contact email list. In addition, a physical postcard was mailed to all residents and businesses with registered addresses in National City inviting them to participate in the outreach process.

The webinars featured the consultant team, WSP USA, and City staff who presented on the different elements of the Focused General Plan

Update. Each webinar included a series of live polling questions for the participants, which included questions that fed into the formation of the Housing Element. The results of the polling for Housing Element related questions are included below. A phone number was provided to participants so that Spanish speaking audience members could listen to live Spanish translations of the presentations throughout the entirety of the webinar series. City staff hosted an additional webinar on September 9, 2020 which was conducted in Spanish to provide a focused update to Spanish speaking residents. The webinar presentations were made available for playback on the City's webpage for the project. Summaries of questions participants asked during the webinars with answers from the City were also posted so that those unable to make the dates the presentations were held could review the inquiries addressed. As another outreach option for the public, office hours were made available for residents to call in and verbally ask questions in English and Spanish to the consultant team and City staff after each webinar.



An interactive public outreach survey on the platform MetroQuest was available from August 2020 to September 2020. This survey was also made available in Spanish. The survey included polls and a map marking exercise that allowed participants to both select housing types they desire the City to help develop, as well as spatially mark where they would like to see housing developed in the City in the future. The survey was marketed online on the City's website and social media pages, through an email to the City's mailing list, and through physical flyer print-outs that were posted at community hotspots and passed out through partner agencies and nonprofits. This robust marketing approach helped reach residents despite the unprecedented quarantine in effect due to the COVID-19 pandemic.

Additionally, stakeholder interviews were held with local stakeholders (See Table HE-19) to gather input, feedback, and recommendations for insight into National City's development and housing market.



3.2. RESULTS OF OUTREACH

3.2.1. ALL OUTREACH METHODS

The entire outreach process resulted in feedback that reflected concerns about growth, a desire for neighborhood improvements, a predilection for a by-right process for developing housing, and recommendations that included:

- » Identifying 8th Street and Highland Avenue as an opportunity area;
- » Encouraging density in strategic areas;
- » Coordinating new development and public improvements;
- » Promoting comprehensive parking management strategies and coordinating parking with planned transit investments;
- » Integrating key community concerns into the development of Objective Design Standards; and

- » Reducing barriers to housing development.

3.2.2. WEBINARS

The entire webinar series had 63 participants. On average, the webinar polling questions related to Housing yielded the following results:

- » Housing was the top topic area chosen as the most important to participants;
- » Housing production was prioritized by participants in the following geographic areas from highest to lowest in this order: Downtown National City, Westside/Old Town National City, Other Neighborhoods, Commercial Corridors (Highland, Plaza, 8th, and 18th Street); and
- » Housing types that participants would like to see produced were rated from highest to lowest in the following order: Accessory Dwelling Units, Low-Medium density (multifamily up to 3 stories), Medium density (multifamily up to 6 stories), Medium-High density (multifamily up to 9 stories), and High density (multifamily up to 20 stories).

3.2.3. METROQUEST SURVEY

The MetroQuest survey resulted in feedback from 200 participants, with three completing it in Spanish. Respondents were asked to provide optional demographic information at the end of the survey. The ethnic demographics of those who participated in the MetroQuest survey are reflective of the resident demographic makeup of the City; this demographic distribution was a good indicator that outreach was successful in reaching a representative subset of the city's diverse communities.

During the "Rate Housing Type" activity of the MetroQuest survey, participants were asked to rate their preference for varying levels of density in specific neighborhoods of the city. Respondents showed

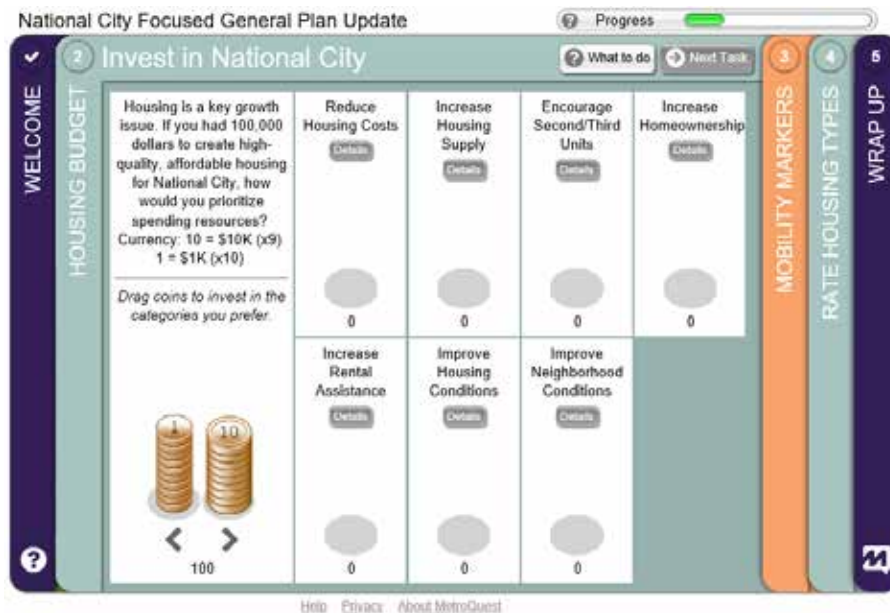
an average preference for low- to medium-density housing in the Westside Specific Plan area and medium-density housing along commercial corridors. They showed a greater average preference for medium- to high-density housing in the Downtown Specific Plan area.

3.2.4. STAKEHOLDER INTERVIEWS

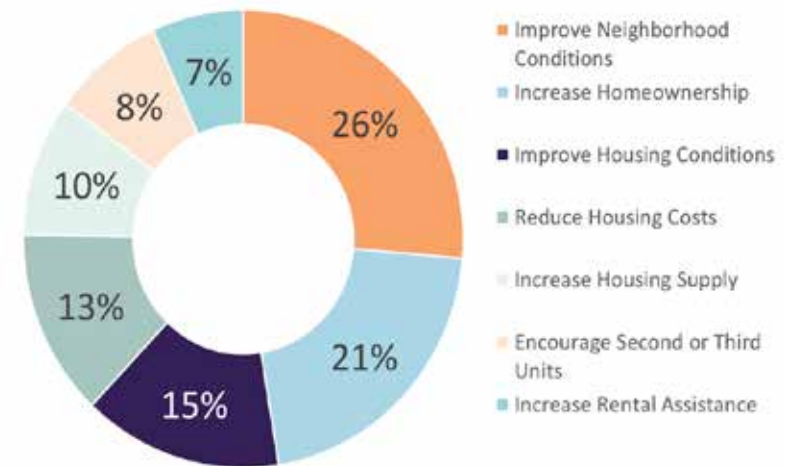
The stakeholder interviews resulted in detailed feedback that assisted in the development of recommendations for actions the city can take to reduce barriers to housing development and improve the existing housing stock. These recommendations include:

- » Reducing minimum lot requirements and allowing for higher density to be built on smaller parcels;
- » Allowing multifamily development in areas zoned for single-family development;
- » Reducing permitting and discretionary review times and fees;
- » Reducing development requirements and revising development standards, such as parking;
- » Providing programs and policies that maintain and increase affordable housing and transitional housing;
- » Prioritizing housing development in locations away from sources of pollution in order to avoid co-location issues with existing land uses; and
- » Pursuing more funding sources to fund programs that preserve affordability or build more affordable units.

Feedback from the outreach process informed and guided the development of the 6th cycle Housing Element goals, policies, and programs in Chapter 6.



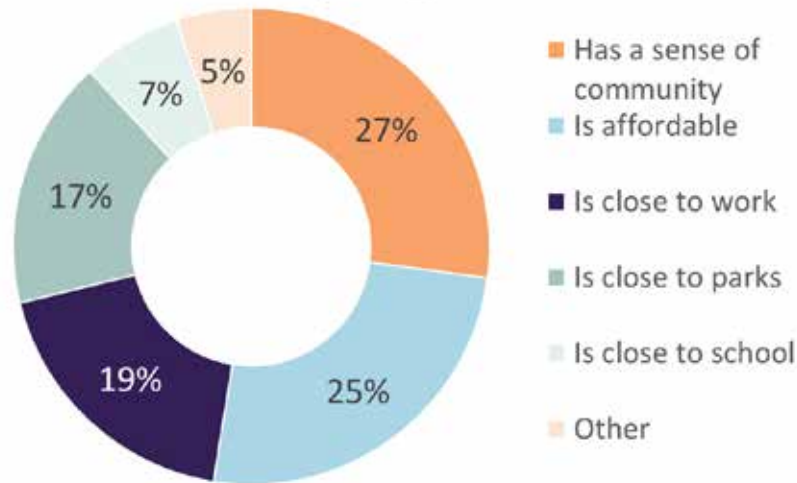
Average Percent of Chips Spent



Average Housing Type Rating: Low-Medium Density			Average Housing Type Rating: Medium Density		
Neighborhood	Average Rating	Rank	Neighborhood	Average Rating	Rank
Downtown	3.38	4	Downtown	2.75	3
Westside	3.58	3	Westside	3.00	2
Commercial Corridors	3.44	5	Commercial Corridors	2.50	5
Other Neighborhoods	3.50	2	Other Neighborhoods	2.25	4
Overall Average	3.46		Overall Average	2.75	

Average Housing Type Rating: Medium-High Density			Average Housing Type Rating: High Density		
Neighborhood	Average Rating	Rank	Neighborhood	Average Rating	Rank
Downtown	2.37	3	Downtown	3.10	5
Westside	2.38	5	Westside	3.80	3
Commercial Corridors	2.34	2	Commercial Corridors	3.10	2
Other Neighborhoods	1.69	4	Other Neighborhoods	3.30	4
Overall Average	2.17		Overall Average	3.75	

I like that my neighborhood...



Respondent Ethnic Background

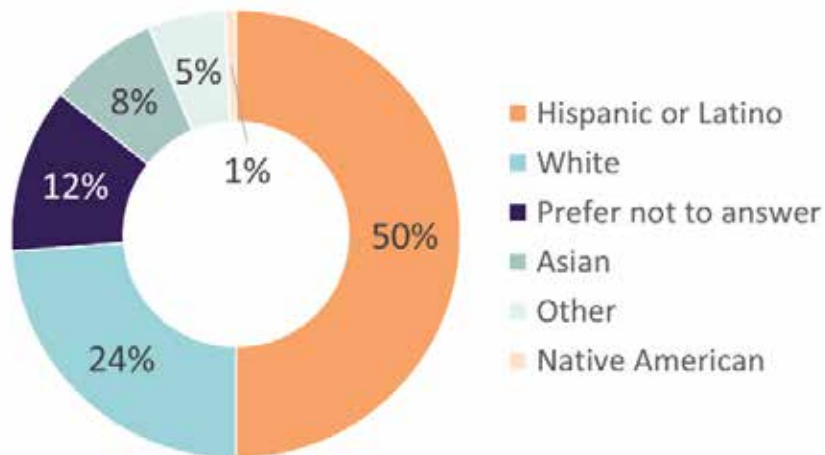


Table HE-24: List of Stakeholders Contacted and Interviewed

Name of Individual (Last, First)	Organization
Bickford, Ryan	KirE Builders
Bower, Susan	Regional Task Force on the Homeless
Breedlove, Kathy	Malick Infill
Gaspar, Stephan	KirE Builders
Engelman, Casey	Urban Housing Partners
Hernandez, Monserrat	Environmental Health Coalition
Kohler, Tamera	Regional Task Force on the Homeless
Litchney, Seth	SANDAG
Malick, Andrew	Malick Infill
Manriquez, Arnulfo	MAAC
Mardsen, Malekka	Climate Action Campaign
Martinez, Cathy	Springboard Home Loans
Mattox, Lahela	Regional Task Force on the Homeless
Mejia, Roxana	San Diego Habitat for Humanity
Nunn, Laura	San Diego Housing Commission
Rothery, Jodi	Chelsea Investment Corporation
Parent, Colin	Circulate San Diego
Pfeiler, Lori	San Diego Habitat for Humanity
Schwartz, Jacob	Urban Housing Partners
Serrano, Danny	Environmental Health Coalition
Wilson, Anne	Chelsea Investment Corporation
Vasilakis, Matthew	Climate Action Campaign



*Plaza Village
Senior Living*

4. HOUSING RESOURCES

This chapter summarizes the resources available for the development, rehabilitation, and preservation of housing in National City. The potential sites analysis includes an evaluation of vacant lands, underutilized sites, and approved and proposed residential projects identified to accommodate National City's regional housing needs goals for the planning period, 2021 through 2029. Financial resources available to support housing activities and the administrative resources available to assist in implementing the City's housing programs are also included as an inventory in this chapter.

4.1. EXISTING AFFORDABLE HOUSING RESOURCES

National City's Housing Authority provides resources and services to residents seeking affordable housing opportunities. Listed in Table HE-22 are the resources in the South Bay that accept Housing Choice Vouchers (Section 8) and additional resources such as emergency/transitional housing and shelters for residents seeking housing

assistance. National City also partners with the a local nonprofit, 2-1-1 San Diego to provide County-wide referral services to housing options for emergency shelters, transitional housing/shelters, and low-income (affordable) housing units which provides additional resources for groups such as families, youth, veterans, seniors, persons experiencing domestic violence and persons experiencing homelessness.

4.1.1. AT RISK UNITS

Assisted housing developments, i.e. a multifamily rental housing development that receives governmental assistance, are at-risk of conversion to market rate units due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. Listed in Table HE-22 are units at-risk of conversion to market rate within the next ten years. Following the table is an analysis of the cost of rehabilitating or subsidizing these units to preserve their affordability, as well as options to preserve their affordability through renewing these deed-restricted units by purchasing an affordability

Table HE-25: List of Affordable Housing Resources

Name of Development	Community Served	Type of Service	Total Units
Existing			
Casa Nueva Vida II (Chula Vista)	Families	Transitional Housing where families can stay for up to 18 months	12
Granger Apartments	Seniors	Affordable Housing	180
InterCity Manor	Seniors & Persons with Disabilities	Affordable Housing	80
Morgan & Kimball Towers	Seniors & Low-Income Persons	Affordable Housing	453
National City Park Apartments I & II	Low- to Moderate-Income Persons	Affordable Housing	456
National City Collaborative Family Resource Center	Families	Service Agency	N/A
Paradise Creek Apartments	Low-Income Persons	Affordable Housing	201
Park Villas Apartments	Low-Income Persons, Families, Seniors, & Persons with Disabilities	Affordable Housing	268
Plaza City Apartments	Seniors & Persons with Disabilities	Affordable Housing	79
South Bay Community Services Shelter – Casas Seguras	Children, Youth, Families, Domestic Violence Victims, Chronic Homeless Individuals	Emergency Shelter/Transitional Shelter	N/A
Summercrest Apartments	Families	Affordable Housing	372

Table HE-20: List of Affordable Housing Resources (Cont.)

Name of Development	Community Served	Type of Service	Total Units
T.E.L.A.C.U. Southbay Manor Apartments	Seniors	Affordable Housing	75
Temporary Bridge Shelters	Adults, Veterans, Families and Single Women	Emergency Shelter/Transitional Shelter	674
Victorian Heights	Homeless women and their children who experience domestic violence	Transitional Housing	8
Vista Del Sol	Low Income Persons	Affordable Housing	132
Proposed			
Roosevelt Tower	Very-Low- to Low-Income Persons; Military families; Mixed-Income families	Affordable Housing	400
Kimball Highland Master Plan	Senior-Housing, Intergenerational Housing	Affordable Housing	202
SOURCE: SAN DIEGO COUNTY HOUSING AND COMMUNITY DEVELOPMENT SERVICES, RENTAL ASSISTANCE AND AFFORDABLE HOUSING DIRECTORY 2020; NATIONAL CITY, CAPER FY 2018-2019, SEPTEMBER 2019; SAN DIEGO HOUSING COMMISSION, CITY OF SAN DIEGO'S HOMELESS SHELTERS AND SERVICES PROGRAMS, WEBPAGE, ACCESSED APRIL 21, 2020; 211 SAN DIEGO, HOUSING RESOURCES, WEBSITE, ACCESSED APRIL 21, 2020			

Table HE-26: Summary of Units At-Risk of Converting Between 2021 and 2031

Project Name	Address	Type	Number and Type of Assisted Units					No. Non-Elderly Units	No. Elderly Units	Type of Subsidy	Length of Affordability	Year of Dedication (D.)/Credit Allocation (C.A.)/Built (B.)	Earliest Date of Expiration
			Total	Extremely Low (0-30%)	Very-Low (31-50%)	Lower (51-80%)	Moderate (81-120%)						
Granger Apartments	2700 E 8th St	MF	180		163	17		180	0	Low-Income Housing Tax Credits ,Project Based Section 8	Eligible for regulatory relief after 15-year initial compliance*	C.A. 2015	2030
Inter City Manor	2101 L Ave	MF	80		79			80	0	Section 8 HCV	40-yr mortgage, 20-yr prepayment option	B. 1971	N/A
Morgan Tower	1317 D Ave	SR	152		150			0	150	Section 231, Project-Based Section 8	99 years from completion of construction.	D. 2019	03/25/2118
Kimball Tower	1317 D Ave	SR	151		135			0	149	Section 231, Project-Based Section 8	99 years from completion of construction.	D.2019	03/25/2118
Paradise Creek Apartments	2120 Hoover Avenue	MF	201	23	130		47	201	0	Low-Income Housing Tax Credits	99 years from completion of construction.	C.A. 2014	11/1/2116
Park Villas Apartments	817 Eta Street	MF	268		28	240		268	0	Low-Income Housing Tax Credits	Eligible for regulatory relief after 15-year initial compliance*	C.A. 1997	12/31/2022
Plaza City Apartments	1535 E Plaza Blvd	MF	80	8	52	20		80	0	Low-Income Housing Tax Credits	55 years Date completed: 04/15/2008	C.A. 2006 04/15/2063	04/15/2063
Summercrest Apartments/ Plaza Manor Apartments	2615 E Plaza Blvd	MF	372		115	255		372	0	Low-Income Housing Tax Credits	Sold to new buyer in 2014 and paid off loan; covenants remain in place	C.A. 2001	04/15/2032

Table HE-21: Summary of Units At-Risk of Converting Between 2021 and 2031 (Cont.)

Project Name	Address	Type	Number and Type of Assisted Units					No. Non-Elderly Units	No. Elderly Units	Type of Subsidy	Length of Affordability	Year of Dedication (D.)/Credit Allocation (C.A.)/Built (B.)	Earliest Date of Expiration
			Total	Extremely Low (0-30%)	Very-Low (31-50%)	Lower (51-80%)	Moderate (81-120%)						
T.E.L.A.C.U. Southbay Manor Apartments	630 E 14th St	SR	75		75			0	75	HUD Section 202 Supportive Housing for the Elderly program	20 years from 03/21/1996	D.1995	08/06/2035
Vista Del Sol	1400-1545 Q Ave	MF	132		27	103		132		Low-Income Housing Tax Credits	Renewed affordability agreement.	C.A. 2017	2073
Victorian Heights	1125-37 B Ave	TH	8		8			0	0	N/A	N/A	D. July 2006	N/A
Source: HUDuser.gov, Low Income Housing Tax Credits query, Accessed August 2020, https://lihtc.huduser.gov/ ; affordablehousingonline.com, https://www.lowincomehousing.us/CA/national_city.html ; HomeAid San Diego, http://www.homeaidsd.org/our-work/projects/victorian-heights/ ; www.publichousing.com/; https://www.mynewplace.com/apartment/inter-city-manor-national-city-ca-4000m5261589 ; National City Housing Authority, October 2020; HUD.gov, Multifamily Assistance and Section 8 Database, Accessed October 2020, https://www.hud.gov/program_offices/housing/mfh/exp/mfhdiscl ; Housing Apartments, Granger Apartments, Accessed December 2020 https://housingapartments.org/rental_detail/7056													
Notes: Not at-risk between 2021-2031 and At-risk between 2021-2031.													
Notes: MF = Multifamily, SR = Senior Residential, TH = Transitional Housing, N/A = Not applicable as units that can lose their affordability due to its status as a shelter or dedicated affordable residential units.													
Note: *Once the 15-year affordability period is over, LIHTC owners who seek and are granted regulatory relief from the program can convert their properties to market-rate units. https://www.huduser.gov/portal/pdredge/pdr_edge_research_o81712.html													

covenant, or a transfer of ownership to an entity with the capacity to acquire and preserve multifamily at-risk developments. The purpose of this analysis is to determine whether replacement (new construction) or preservation (acquisition and rehabilitation, and/or direct rental subsidy commitments) will be the most economical approach to preserving at-risk units.

No at-risk units were converted to market rate during the 2019 calendar year. As of the 2019 Annual Building Activity Report Summary Report, National City preserved 268 at-risk units in 2019 at Fairfield Park Villas.⁵⁵ Preserved units “at-risk” of conversion to market rate uses are those units that are deed restricted to very-low and low-income households.

The Housing Element recommends implementing a program to preserve at-risk units to avoid the displacement and impact on the livelihoods of low-income residents of National City. Per Government Code Section 65583(c)(6)), the program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (8) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance.

RENT SUBSIDIES FOR PRESERVATION

The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very-low-income household. Based on the assumptions and estimates in Table HE-24, a total of \$444,574.40 would be required each month to maintain the at-risk units under the tenant-based vouchers of the HCV Program, which translates to

approximately \$5,334,893.00 annually to preserve the affordability of housing.

REHABILITATION-ACQUISITION

Prior research comparing the costs of new construction and acquisition-rehab has generally found that the initial development costs (land and construction) for an acquisition-rehab project are lower than the costs of new construction. However, these studies have not accounted for differences in initial unit quality. If, for example, a property developed through acquisition-rehab is of substantially lower quality than a new construction project, the costs to maintain the rehabbed project in acceptable condition over the long term may be higher than for the new construction project.⁴⁴ Rehabilitation is defined as repairs, improvements, replacements, alterations, and additions to existing properties. A survey of the City’s housing stock would assist in determining approximately how many units would benefit from rehabilitation; it can be assumed that due to the age of most residential buildings in National City, most would benefit from rehabilitation to improve the quality of the housing stock. Per the City’s CAPERS in previous years, approximately \$86,300.00 was spent to rehabilitate 5 units in 2015-2016.⁴⁵ Based on that history, it would cost approximately \$17,260.00 to renovate a single unit to acquire it in order to maintain its affordability.

44. Center for Housing Policy, Comparing the Costs of New Construction and Acquisition-Rehab In Affordable Multifamily Rental Housing: Applying a New Methodology for Estimating Lifecycle Costs, February 2013 https://nhc.org/wp-content/uploads/2017/10/CostComparison_LifeCycleUnderwriting_workingpaper.pdf

45. National City, Consolidated Annual Performance Report (CAPER) FY 2015-2016, <https://www.nationalcityca.gov/home/showdocument?id=13109>

Table HE-27: Rent Subsidies Required

Unit Size	Total Units	Fair Market Rent	Household Size	Household Annual Income	Utility Allowance	Affordable Cost (Minus Utilities)	Monthly per Unit Subsidy	Total Monthly Subsidy
Very-Low Income (50% AMI)								
Studio	0	1,120.00	1	40,450.00	185.00	1,006.63	113.38	0.00
1-BR	160	1,250.00	2	46,200.00	239.00	1,149.03	100.98	16,156.00
2-BR	400	1,620.00	3	52,000.00	291.00	1,292.73	327.28	130,910.00
3-BR	344	2,300.00	5	57,750.00	344.00	1,435.15	864.85	297,508.40
Total	904	--	--	--	--	--	--	444,574.40
Source:								
1. Fair Market Rents (FMR) FY 2020 for San Diego County, CA, Zip Code 91950 are determined by HUD. https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2020_code/2020summary.odn								
2. San Diego County 2020 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD). https://www.sandiegocounty.gov/sdhcd/rental-assistance/income-limits-ami/								
3. Affordable cost = 30% of household income minus utility allowance. Utilities based on San Diego County Utility Allowance, April 2020.								
4. Monthly subsidy per unit is determined by the use of San Diego County set payment standards. Payment standards are used to calculate the maximum subsidy the HACSD will pay toward rent and utilities for rental units leased to families with HCVs. Under the HCV program, families are generally required to pay 30 percent of their adjusted income toward rent and utilities. The HACSD then pays the difference between the family's required contribution and the lower of (a) the payment standard and (b) the gross rent (rent plus estimated utilities) of the unit. https://www.sandiegocounty.gov/content/sdc/sdhcd/faq/safmr.html								
Note: Number of units for National City Park Apartments sourced from Apartments.com. https://www.apartments.com/national-city-park-apartments-national-city-ca/g37v7zz/								
Note: Number of units for Granger Apartments sources from HousingApartments.org. https://housingapartments.org/rental_detail/7056								

PURCHASE OF AFFORDABILITY COVENANT

Another option to preserve the affordability of the at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include bonds, writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of this option depends on whether the complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City could ensure that some or all of the units remain affordable.

TRANSFER OF OWNERSHIP

The San Diego Housing Federation maintains a current list of public and private nonprofit corporations which have legal and managerial capacity to acquire and manage at-risk housing developments. The list is accessible on their website: <http://www.housingsandiego.org/>.

REPLACEMENT THROUGH NEW CONSTRUCTION

A variety of potential funding sources is available for replacing or subsidizing at-risk units. Due to high costs of developing and preserving housing and limitations on both the amount and uses of funds, multi-layering of funding sources may be required.

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its voucher program budget authority and attach the funding to specific units rather than using it for tenant-based assistance per 24 CFR 983.6. PHAs may only operate a PBV program if doing so is

consistent with the PHA's Annual Plan and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)]. The NCHA is able to rank proposals for use of the PBV's based on a list of criteria, one of which includes the extent to which the project preserves or replaces affordable housing units at risk of non-renewal or loss of a previously committed affordable housing subsidy.⁴⁶

The construction of new low-income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e. square footage and number of bedrooms), location, land costs, and type of construction. Assuming an average development cost of \$184,501.33 per unit for multi-family rental housing, replacement of the 904 at-risk units would require approximately \$166,789,200.00 excluding land costs (See Table HE-25). When land costs and developer profits are included, the construction costs of new units can easily double.

4.1.2. HOUSING CHOICE (SECTION 8) VOUCHERS

The Housing Choice Voucher (HCV) program (formerly Section 8) is a rent subsidy program that helps low-income families and seniors pay rents of private units. HCV tenants pay a minimum of 30 percent of their income for rent and the local housing authority pays the difference up to the payment standard established by housing authority. The program offers low-income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The housing authority establishes payment standards based on HUD-established Fair Market Rents (Table HE-26). The owner's asking price must be supported by comparable

46. National City, Housing Choice Voucher (HCV) Program Administrative Plan for Fiscal Year 2020-2021

Table HE-28: Estimated New Construction Costs

Unit Size	A	B	C	D
	Total Units	Estimated Average Unit Size (sq. ft.)	Estimated Gross Building Size	Estimated Gross Building Costs
Studio	0	450	0	\$0.00
1-BR	160	600	115,200	\$18,654,000.00
2-BR	400	850	408,000	\$66,810,000.00
3-BR	344	1,200	495,360	\$81,115,200.00
Total	904	--	1,018,560	\$166,789,200.00
Average Cost per Unit:				\$184,501.33
Notes: (C) = (A) x (B) x 1.20 (i.e. 20% inflation to account for hallways and other common areas)				
(D) = (C) x \$131.00 (per square foot construction costs in the West Region) x 1.25 (i.e. 25% inflation to account for parking and landscaping costs)				
Source: Veronica Tam and Associates, 2020; Homeguide.com, How Much Does it Cost to Build a House?, Accessed October 2020;				

rents in the area. The program participant pays any amount in the excess of the payment standard.

In accordance with the Quality Housing and Work Responsibility Act of 1998, each fiscal year the National City Housing Authority (NCHA) will reserve a minimum of seventy-five percent (75%) of its Housing Choice Voucher new admissions for families whose income does not exceed thirty percent (30%) of AMI. HUD refers to these families as extremely low-income families.⁴⁷

47. National City, Housing Choice Voucher (HCV) Program Administrative Plan for Fiscal Year 2020-2021

The Housing Authority of the City of National City administered 1,123 vouchers as of July 2019.⁴⁸ There are currently 3,736 persons on the HCV waiting list and 906 persons on the Kimball Tower waiting list as of November 2020.⁴⁹ Currently, applicants have a waiting period of eight to ten years once assigned to the waiting list. Approximately 10.1% of the waitlist identifies as Black, 66.3% as Hispanic, 73.0% as White, 32% as Other, 27.1% as Senior, and 24% as Disabled. There are 480 participating landlords as of July 2020.⁵⁰

To be eligible, applicants must live or work within National City and must earn equal to or less than 50 percent of the San Diego Median Area Income (Table HE-27). The applicant must qualify as one of the following: a low-income senior citizen (ages 62 years or older), a low-income disabled individual, or a low-income working family (with dependent child). Highest priority goes to persons who live or work in the area served and who are elderly, veterans, disabled, or working families. Applicants require proof of income, proof of residency, the application form, and a photo identification.

The Section 8 Project-Based Housing Choice Voucher Program of the NCHA (PBV) may allocate up to 200 Housing Choice Vouchers (approximately 20 percent of the Housing Choice Voucher Program) to projects. These vouchers may be used in up to 100 percent of any given project that services elderly or disabled, up to 25 percent of multifamily projects with more than four dwelling units, and up to 100 percent of the units in projects where there is a maximum of four dwelling units per building. The NCHA may administer a separate project-based waiting list.

48. National City, Housing Choice Voucher (HCV) Program Administrative Plan for Fiscal Year 2020-2021

49. National City, Email correspondence from Housing Programs Manager of the Housing Voucher Choice Program to WSP, November 30, 2020

50. San Diego County, 2020 Regional Analysis of Impediments to Fair Housing Choice, July 2020

Table HE-29: Annual Income Limits (FY 2020)

Family Size	1	2	3	4	5	6	7	8
Area Median Income 2020	\$92,700							
Extremely-Low Income 30% of Median	\$24,300	\$27,750	\$31,200	\$34,650	\$37,450	\$40,200	\$43,000	\$45,750
Very-Low Income 50% of Median	\$40,450	\$46,200	\$52,000	\$57,750	\$62,400	\$67,000	\$71,650	\$76,250
Low Income 80% of Median	\$64,700	\$73,950	\$83,200	\$92,400	\$99,800	\$107,200	\$114,600	\$122,000
SOURCE: NATIONAL CITY, SECTION 8 HOUSING VOUCHER (HCV) PROGRAM, https://www.nationalcityca.gov/government/national-city-housing-authority/section-8-housing-choice-voucher-hcv-program ; SAN DIEGO COUNTY HOUSING AND COMMUNITY DEVELOPMENT SERVICES, 2020 AREA MEDIAN INCOME (AMI) AND ANNUAL INCOME LIMITS (FY 2020) EFFECTIVE 04/01/2020, HTTPS://WWW.SANDIEGOCOUNTY.GOV/SDHCD/RENTAL-ASSISTANCE/INCOME-LIMITS-AMI/								

Table HE-30: Small Area Fair Market Rents (SAFMR) for National City (FY 2020)

Bedroom Units	0	1	2	3	4
SAFMRs Market Rent	\$1,120	\$1,250	\$1,620	\$2,300	\$2,840
<p>Note: Small Area Fair Market Rents (SAFMRs) are FMRs calculated for ZIP Codes within Metropolitan Areas. Small Area FMRs are required to be used to set Section 8 Housing Choice Voucher payment standards in areas designated by HUD.</p> <p>Housing voucher subsidies are capped based on fair market rents (FMRs) that HUD estimates each year for modest housing units in a geographic area. A family with a voucher pays about 30 percent of its income for rent and utilities, and the voucher covers the remainder up to a payment standard set by the state or local housing agency.</p>					
SOURCE: HUD, FY 2020 ADVISORY SMALL AREA FAIR MARKET RENTS LOOK UP SYSTEM FOR SAN DIEGO COUNTY, ZIP CODE 91950 (FY 2020)					

The Small Area Fair Market Rent (SAFMR) Final Rule was published on November 16, 2016 and became effective on January 17, 2017. Under the final rule, the use of Small Area FMRs is required in the administration of the HCV program for certain metropolitan areas, including San Diego-Carlsbad, CA MSA. The purpose of this rule is to establish a more effective means for HCV tenants to move into areas of higher opportunity and lower poverty by providing the tenants with a subsidy adequate to make such areas accessible and, consequently, help reduce the number of voucher families that reside in areas of higher poverty concentration.⁵¹

4.2. POTENTIAL SITES FOR HOUSING

State law requires individual communities to play an active role in ensuring that enough housing is available to meet expected population growth in the County. The San Diego Association of Governments (SANDAG) is authorized to set forth specific goals for the amount of new housing that should be produced in each member jurisdiction over a specified time period. For the current Housing Element cycle, SANDAG has projected housing needs for an 8-year period from 2021 through 2029. This chapter discusses how National City will facilitate and encourage the provision of housing to meet housing goals for all economic segments during the planning period, from 2021 through 2029.

4.2.1. AVAILABLE SITES INVENTORY

Government Code Section 65583(a)(6) requires “An analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, and the cost of construction.” National City is largely built-out

with a limited supply of vacant, developable land; a majority of the National City’s units are accommodated through non-vacant sites.

SITE SUITABILITY ANALYSIS

Projects that were processed during the City’s 5th Cycle (2013-2020) were analyzed for key trends and informed the development of a multi-factor site suitability analysis. An evaluation was conducted for the approximately 10,339 parcels in National City to determine sites that may be available to accommodate the 2021-2029 RHNA for National City (See Table HE-28). Sites meeting one or more of the factors listed below were evaluated for inclusion in the inventory. Site selection emphasized infill and redevelopment along mixed-used corridors in the city to leverage existing zoned capacity, as well as to encourage residential development along corridors with access to transit and a walking and rolling friendly environment. Special consideration was given to the siting of lower-income sites to ensure their geographic distribution throughout the city while also providing access to supportive amenities such as education facilities and transit. The site suitability analysis led to the selection of 398 parcels, which are mapped in Appendix A and listed in Appendix B. Note that the identification of a parcel in the site inventory does not constitute a development project or proposal; it provides an assessment of the city’s capacity to support housing production consistent with State Housing Law.

REALISTIC CAPACITY

Government Code Section 65583.2(c) requires, as part of the analysis of available sites, a local government to calculate the projected residential development capacity of the sites identified in the housing element that can be realistically achieved. To determine the realistic development capacity for sites, a discount factor was derived from observed development trends within National City during the 5th

51. National City, Streamlined Annual Public Housing Agency Plan for Fiscal Year 2019-2020

Table HE-31: Site Inventory – Suitability Evaluation Criteria (FY 2020)

CRITERIA	DESCRIPTION/DATA SOURCE
Vacant	The site does not include a significant structure and/or other improvement(s). Source: SanGIS 2020 Existing Land Use layer with staff verification via satellite imagery and/or field verification
Zoning and Lot Size*	The site is zoned 30 DU per acre or greater and is between 0.5 and 10 acres. Source: City of National City Zoning layer and SanGIS 2020 Parcels layer
Property Valuation	The property has a low improved value (60% or less), based on available building, land, and property valuation records from the San Diego County Assessor's Office. Source: SanGIS 2020 Parcels layer
Mobility Options and Access to Public Amenities and Services	The site is near transit, public amenities, and within a compact, walkable environment. Source: City of National City Transit Network layer, City of National City INTRACONnect Study (2020), and/or field verification
Structure Age	The primary structure on a site is over 30 years old. Source: SanGIS 2020 Parcels layer
City-Owned	The site is owned by the City and may be used for residential development. Source: SanGIS 2020 Parcels layer and the City of National City
Prior Cycle	The site was identified in a prior cycle Housing Element Inventory and has not yet developed or redeveloped. Source: City of National City 4 th and 5 th Cycle Housing Element Inventories
Development Capacity	The site has a residential development capacity greater than 25% per existing allowable zoning. Source: City of National City Zoning layer and SanGIS 2020 Parcels layer
Development Interest	The property owner has discussed the potential development (or redevelopment) of the site with National City staff, the site has been analyzed through a separate planning study that recommends its redevelopment (e.g., INTRACONnect; 24 th Street TODO), the site has a "For Sale" or "For Lease" sign, and/or the site has been entitled. Source(s): City of National City, Opportunity Zone Listings, and/or field verification
Notes: * = Only applicable for low- and very-low- Income housing sites.	



Sites with a visible “For Lease” or “For Sale” sign.



Sites without any significant improvements (vacant, per HCD’s definition).



Sites with mobility options and access to public amenities and services.

Cycle and an assessment of land use controls and site improvement requirements. Case studies are included in Appendix C. General trends and the underlying rationale for the discount factors are summarized below:

Residential Zones: 65 single-family units were permitted across the City during the 5th Cycle. Development up to 60 percent of the allowable maximum is assumed within residential zones based on targeted minimum densities, lot coverage requirements, setbacks, and parking standards (i.e., RS-1, RS-2, RS-3, and RS-4). Two multifamily projects, including Vista Jardin (10 units) and Alinea Townhomes (10 units), were permitted within the city's multifamily residential zones during the 5th Cycle. The density of these projects ranged from 46 to 48 percent of the zone maximums; the average was approximately 47 percent. The rising costs of construction coupled with the increased demand for housing are anticipated to result in more efficient development at higher densities. Development up to 60 percent of the allowable maximum is assumed within multifamily residential zones (i.e., RM-1, RM-2, and RM-3).

Mixed Use Zones: Five multifamily projects were permitted and constructed within the City's mixed use zones during the 5th Cycle, including Mariner's Landing (61 units), Plaza Del Rey (15 units), The Kimball (47 units), Bella Vita (70 units), and Palm Plaza (77 units). The density of these projects ranged from 53 to 71 percent of the zone maximums; the average was approximately 60 percent. The rising costs of construction coupled with the increased demand for housing are anticipated to result in more efficient development at higher densities. Residential development up to 65 percent is assumed within mixed use zones (i.e., MXC-1, MXD-1, MXC-2, and MXD-2).

It should be noted that single-use projects are permissible within the City's mixed- use zones. Based on permit data from the 5th Cycle,

50 percent of the development within the mixed- use zones was 100 percent commercial. Of the remaining 50 percent, 35 percent was stand-alone residential and 15 percent was mixed-use including both residential and commercial. The mixed-use zones accounted for 270 units during the last planning period.

Changes in retail consumption have also been compounded by the COVID-19 pandemic; according to the report published by SANDAG titled "The San Diego Economy COVID-19 Impacts: A Year in Review" (March 2021), more retail activity is occurring online. Declining demand for brick-and-mortar retail/commercial spaces, coupled with the increasing demand for housing, are likely to result in more residential and mixed-use development in the future. The site inventory also includes a buffer to accommodate the potential loss of residential capacity due to commercial development.

Westside Specific Plan: One multifamily project was constructed within the City's Westside Specific Plan area during the 5th Cycle. The Paradise Creek Apartments provide 201 affordable units. The density of this project was approximately 176 percent of the zone maximum. One of the goals of the Westside Specific Plan is to promote a compatible mix of uses. The assumptions of the City's mixed use zones, which are similar in intent, are applied to the Westside Specific Plan area to prevent the oversampling of one project. Residential development up to 65 percent is assumed within the Westside Specific Plan area (i.e., MCR-1, MCR-2, and MCR-2 TOD).

Downtown Specific Plan: The Downtown Specific Plan area is governed primarily by Floor Area Ratio (FAR). Several development scenarios using different approaches to bulk, massing, parking, and circulation/access were developed and analyzed; these scenarios are summarized in Appendix D. The potential density for the Downtown Specific Plan area is based on the most conservative development

program, which prioritizes at-grade parking and then maximizes the remaining allowable FAR.

Two multifamily projects were permitted within the City's Downtown Specific Plan area during the 5th Cycle, including 8th and B (108 units) and Coachella Affordable Housing Investors (131 affordable units). The density of these projects ranged from 66 to 84 percent of the potential maximum density; the average was approximately 75 percent. More recent applications submitted for the Downtown Specific Plan area demonstrate interest in developing between 82 percent to 292 percent of the potential density. Residential development up to 80 percent of the potential density is assumed within the Downtown Specific Plan area (i.e., 1A, 1B, 2, 3, 4, 5A, 5B, 6, 7, 8, 9, 10, 12A, and 13).

Capacity calculations, based on discounted densities, were used to determine National City's realistic development potential and ability to meet RHNA goals. Density assumptions and discount factors are summarized in Table HE-29.

SMALL SITES AND LOT CONSOLIDATION

National City has varied parcelization patterns including a number of parcels less than 0.5 acres. As shown in Table XX, projects such as Vista Jardin (0.28 acres), Alinea Townhomes (0.29 acres), and Plaza Del Rey (0.32 acres) have successfully developed market rate multifamily residential units on these smaller sites. Due to the scale of efficiency needed to support affordable housing, however, such sites are unlikely to accommodate lower-income units. Consistent with the Housing Element Site Inventory Guidebook (June 2020), no sites less than 0.5 acres or greater than 10 acres have been identified for lower-income housing.

Table HE-32: Realistic Density – Discount Factors and Capacity Assumptions

Zone	Maximum Density	Discount Factor (Applied to Maximum Density)	Realistic Density
RS-1	4.00	0.60	2.40
RS-2	9.00	0.60	5.40
RS-3	15.00	0.60	9.00
RS-4	17.40	0.60	13.05
RM-1	23.00	0.60	13.80
RM-2	48.00	0.60	28.80
RM-3	75.00	0.60	45.00
MXC-1	48.00	0.65	31.20
MXC-2	75.00	0.65	48.75
MXD-1	48.00	0.65	31.20
MXD-2	75.00	0.65	48.75
MCR-1	24.00	0.65	15.60
MCR-2	45.00	0.65	29.25
MCR-2 TOD	60.00	0.65	39.00

Prior projects have shown the ability for successful lot consolidation. Mariner's Landing consolidated 4 parcels into 1.84 acres to develop 61 market rate units. The Coachella Affordable Housing Investors project consolidated 3 parcels into 1.33 acres to support the development of 131 affordable housing units. Because lot consolidation is highly dependent on a number of variables, the site inventory included in Appendix X only assumes lot consolidation for contiguous parcels held by the same owner. For example, Consolidation Group AA represents 6 City-owned parcels that form one site totaling 1.49 acres and can support lower-income housing.

SUITABILITY OF NON-VACANT SITES

As previously discussed, National City is predominantly built-out with a limited supply of vacant land available for development. The site inventory relies substantially on the redevelopment of non-vacant sites to fulfill RHNA requirements, including the lower income housing. Vacant sites can only accommodate 3.4 percent of the lower income RHNA. Because the site inventory relies on non-vacant sites to accommodate more than 50 percent of the housing needs for lower-income households, findings based on substantial evidence are required to demonstrate that existing uses will not act as impediments to development and are likely to discontinue during the planning period.

Development trends, described later in this section, demonstrate the intensification of commercial and single-family uses to multi-family residential and mixed-use projects.

The Planning Division has been consulted for institutional knowledge on the development history prior development interest for key sites. Property owners for sites that contribute more than 50 units to the lower-income RHNA have also been asked to complete a survey to assess their interest in future residential development. As of the

drafting of this Housing Element (July 2021), no property owners have responded.

All non-vacant parcels were also chosen because their land value is greater than improvement value, the structure was built prior to 1990, existing uses do not include condominiums or apartments, and redevelopment can at least double the number of existing on-site

Table XX summarizes multi-family residential projects that were constructed or entitled in the City's residential zones, mixed-use zones, and specific plan areas during the 5th Cycle. A majority of these projects were developed on non-vacant sites, including lower income housing projects. The Paradise Creek Apartments (201 affordable units) were developed on a formerly, non-vacant industrial site and the Coachella Affordable Housing Investors project (131 affordable units) were developed on a formerly, non-vacant commercial/office site. More information on these projects from the 5th Cycle is available in Appendix X.

During the 5th Cycle, non-vacant sites contributed approximately 579 out of 726 housing units to National City's housing stock. Existing uses that were redeveloped include:

- » Single-Family Detached;
- » Industrial;
- » Commercial; and
- » Commercial/Office.

All non-vacant parcels were chosen because the land value is greater than improvement value, the structure was built prior to 1990, existing uses are not condominiums or apartments, and redevelopment can at least double the number of existing on-site.

A majority of the currently entitled and pending projects anticipated for the 6th Cycle (discussed in subsequent sections and listed in

Table XX) are being developed on non-vacant sites, as well. These projects include 233 Roosevelt Tower, which will intensify an existing residential site through the construction of 400 affordable units. These projects show the continuation of residential intensification on non-vacant sites. Approximately 902 of the 1,103 proposed units for the 6th Cycle are on non-vacant sites. Uses that are anticipated to be redeveloped include:

- » Single-Family Detached;
- » Commercial;
- » Civic; and
- » Multi-Family Residential.

These projects in the housing development pipeline indicate a continuation of redevelopment and intensification trends into the 6th Cycle. In addition, the declining demand for brick-and-mortar retail/commercial spaces, coupled with the increasing demand for housing, are likely to result in more residential and mixed-use development in the future. Based on these development trends, non-vacant uses are likely to discontinue during the planning period.

ACCESSORY DWELLING UNITS

National City is anticipating the construction of ADU's to fulfill its housing needs, as well. Based on building permit records issued for ADU's between 2017-2020, an average of 3 ADU's are anticipated to be constructed per year during the 2021-2029 period. A total of 20 units are projected for the 6th Cycle. This methodology is based on guidance from HCD.

ENTITLED AND PENDING PROJECTS

Pending, approved, and permitted development projects since June 30, 2020 may be credited towards the RHNA based on affordability, unit count, and demonstrated ability to be built within the remaining

planning period. Table XX summarizes several projects that have been entitled after June 30, 2020 or are pending entitlement. These units are anticipated to be constructed during the 6th Cycle. Some sites, such as E 16th St and National City Blvd, have been rough graded in anticipation of receiving final building permits.

Unit sale prices/rents have been projected based on project funding sources that require affordability (such as the Affordable Housing and Sustainable Communities program) and/or an agreement between the owner/developer and City of National City to provide affordability to lower or moderate income households. If no agreement or similar commitment has been established to require affordability, units are assumed to be market rate.

ADEQUATE SITES

In addition, to comply with the No Net Loss Law, the inventory includes an additional 20 percent capacity for the very-low-, low-, and moderate-income categories. Government Code Section 65863 (i.e., the "No Net Loss Law") requires adequate sites to be maintained to accommodate the remaining RHNA throughout the planning period.

With the 20 percent buffer accounted for, approximately 6,763 units can be accommodated on these sites based on realistic density development standards, which exceeds the 5,809 targeted RHNA share and 20 percent buffer (See Table HE-29 and Table HE-30). A majority of the sites are located within the Downtown Specific Plan and Mixed Use Districts and Corridors; these areas have been most recently rezoned to encourage residential development in higher densities. These areas also have the greatest access to transit amenities.

4.2.2. PROVISIONS FOR HOUSING DEVELOPMENT

Table HE-33: Entitled and Pending Projects

Project/Location	Description	Unit Count			Affordability		
		Existing Units	Proposed Units	Net Units	Lower	Moderate	Above Moderate
E 16th St and National City Blvd	Development proposal for 201 units.	0	201	201	0	0	201
W 14th St and National City Blvd	Development proposal for 31 units.	3	31	28	0	0	28
W 15th St and Roosevelt Ave	Development proposal for 32 units.	2	32	30	0	0	30
W 16th St and National City Blvd	Development proposal for 5 units.	1	5	4	0	0	4
233 Roosevelt Ave	development proposal for 400 affordable units. Project includes an approximately 10,000 s.f. childcare facility. A portion of the project is funded through the Affordable Housing and Sustainable Communities (AHSC) grant program.	2	400	398	398	0	0
National City Blvd and Plaza Blvd	Development proposal for 300 affordable units and 13,000 s.f. of retail.	3	300	297	297	0	0
Kimball Way	Public-private partnership for the development of 145 senior units. Project includes a senior center, health center, and specialized services and amenities.	0	145	145	0	145	0
2323 D Ave	Multi-phased redevelopment proposal for the National City Park Apartments. An anticipated 208 units to be redeveloped during the 6th Cycle (2021 - 2029) planning period.	457	208	-249	-249	0	0
	Totals	468	1322	854	446	145	263

Table HE-34: Sites Inventory Target Capacity for Residential Development

Income Group	Percentage of AMI	RHNA Goal	Buffer	Target Capacity
Very-Low	31-50	645	20%	774
Low	51-80	506	20%	607
Moderate	81-120	711	20%	853
Above Moderate	>120	3575	0%	3575
Totals		5437		5809

Table HE-35: Adequate Sites Inventory Summary

	Lower Income	Moderate Income	Above Moderate Income
	31-80% AMI	81-120% AMI	>120% AMI
RHNA Allocation Summary			
RHNA	1151	711	3575
RHNA + 20% Buffer	1381	853	3575
Adequate Sites Inventory Summary			
Entitled and Pending Projects			
Summary of Units	446	145	263
Residential Single-Family			
RS-1	0	0	10
RS-2	0	17	82
RS-3	0	0	2
Residential Multi-Family			
RM-1	0	2	0
RM-2	0	2	0
RM-3	51	10	25

Table HE-29: Adequate Sites Inventory Summary (Cont).

	Lower Income	Moderate Income	Above Moderate Income
	31-80% AMI	81-120% AMI	>120% AMI
Mixed Use Corridors and Districts			
MXC-1	91	35	301
MXC-2	86	39	898
MXD-2	649	321	739
Downtown Specific Plan			
1A	0	214	509
1B	229	0	136
2	0	33	199
3	0	12	64
5A	0	0	34
5B	0	55	17
6	0	0	158
7	98	0	194
9	0	0	170
10	0	0	38
12A	0	81	99
Westside Specific Plan			
RS-4	0	2	2
MCR-1	3	0	43
MCR-2	79	0	70
Totals	1732	978	4053

In addition to the sites inventory analysis methodology outlined above, policies, provisions, and site recommendations contained in the following plans and studies also assisted in determining the most feasible sites for inclusion in the sites inventory for the 6th cycle.

DOWNTOWN SPECIFIC PLAN (2017)

The Downtown Specific Plan has the following policies/standards to assist in adding to the supply of affordable housing units:⁵²

- » The preservation of housing and naturally occurring affordable housing (NOAH).
- » The reduction of parking requirements. The Specific Plan establishes a parking bonus system for off-street parking/shared parking that reduces parking requirements or awards bonus units to developers that work to reduce VMT and promote TDM.
- » The providing of a more streamlined review process. It is recommended to allow residential and/or commercial projects that are in conformance with the Municipal Code to be approved through a ministerial process. This allowance is to encourage urban infill projects by shortening the process and allowing some surety in the development review.
- » The encouragement of micro units by restructuring Developer Impact Fees (DIFs). It is recommended that the calculation of DIFs is changed to being based on square footage of the unit, rather than being based on the number of units. Changing to a square footage metric provides a greater incentive to a developer to build fewer larger units, therefore increasing the supply of smaller units.

WESTSIDE SPECIFIC PLAN (2010)

Although the Westside Specific Plan has not been updated since before the previous Housing Element Update, it contains provisions for greater residential development that has assisted in the development of the available sites inventory.

A goal of the Westside Specific Plan specifically highlighted an area for development of affordable housing in the City:

- » Goal 3.9: Actively pursue partnerships to construct 200 affordable housing units throughout the plan area and to concentrate efforts towards meeting these affordable housing goals on parcels surrounding Paradise Creek.

Zoning in the Westside Specific Plan included the Multi-use Commercial Residential 1 and 2 (MCR-1 and MCR-2) zones, which assisted with the goal to increase housing options for a diversity of household types. The Mixed Commercial-Residential Zones are applied to areas generally bordering the RS-4 zone to transition to multi-family residential to the downtown commercial area. The MCR zones provide for multi-family development either as rental stock or home-ownership condominiums.⁵³ The Westside Specific Plan also considered redevelopment of underutilized lands to provide opportunities for increased use of public transit in addition to accomplishing neighborhood revitalization goals.

24TH STREET TRANSIT ORIENTED DEVELOPMENT OVERLAY (TODO) FEASIBILITY STUDY (2020)

The 24th Street Transit Oriented Development Overlay (TODO) Feasibility Study builds upon the Westside Specific Plan to strengthen the vision for the area surrounding the 24th Street Transit Center. A primary objective of the TODO plan is to achieve a better alignment between transit infrastructure and public realm enhancements and

52. National City, Downtown Specific Plan, Adopted November 2017

53. National City, Westside Specific Plan, March 2010

land uses in the area through Transit-Oriented Development and Smart Growth Infill Development. A site analysis contained within the study to determine potential residential development potential for key sites was folded into the Housing Element Site Inventory for the 6th cycle.

INTRACONNECT LAND USE AND MOBILITY PLAN (2020)

The Integrating Neighborhoods with Transportation Routes for All Connections (INTRAConnect) Plan also included a brief description and accompanying map of available development areas and vacant lands identified for redevelopment.⁵⁴ Many of these vacant sites can also be considered as available sites for the residential site inventory for this housing plan update.

4.3. FINANCIAL RESOURCES

The major obstacle to addressing the underserved needs is the lack of adequate funding, especially for affordable housing activities. With the dissolution of redevelopment in California and reduced State and Federal funding levels, the City's ability to address the extensive needs in the community is seriously compromised.

Two major sources of funding include HUD's Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) programs funds. In the City's annual Action Plan, priorities established in the Consolidated Plan form the basis for establishing objectives and outcomes for use of these funds, which often include objectives related to affordable housing and programs geared towards housing assistance.⁵⁵ In order for National City to qualify for its CDBG and HOME entitlement funding, it must

comply with an array of statutory and regulatory requirements, such as the development of the: Five-Year Consolidated Plan, Analysis of Impediments to Fair Housing Choice, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report.

Other financial resources the City relies upon are development impact fees (DIFs) and planning review fees. DIFs often add a significant cost factor in affordable housing development. The amount of the fees may constrain housing development and rehabilitation and limit market rate affordability due to the cost increase for each housing unit. Updated fees being charged currently in National City were effective in July 2019, and details fees for residential types based on housing type and square footage.⁵⁶

4.4. ADMINISTRATIVE RESOURCES

A variety of public and private sector organizations have been involved in housing and community development activities in National City. These agencies are involved in the improvement of the housing stock, expansion of affordable housing opportunities, preservation of existing affordable housing, and/or provision of housing assistance to households in need. These agencies will continue to be relied upon and funded as necessary by the City throughout the current planning period to administer programs and services to support the residents of National City. Table HE-33 lists the administrative resources available to the City.

54. National City, INTRAConnect Plan, February 2020

55. National City. Annual Action Plan (AAP) City FY 2018-2019, HUD Program Year 2018. June 2018.

56. National City, User Fee Schedule, Adopted October 2, 2018 – Effective January 1, 2019, Revised adopted May 21, 2019, effective July 31, 2019.

Table HE-36: Administrative Resources

Name	Purpose	Community Served	Resources Offered
Alpha Project	Homeless Services	Provides homeless outreach services to homeless individuals and families living in National City.	Services include assistance with obtaining affordable housing; residential substance abuse treatment centers; supportive housing for people with special needs; and emergency shelter in the City of San Diego which borders National City. Participates in “WeAllCount,” San Diego’s Annual “Point-in-Time Count” of homeless persons annually.
Casa de Salud Youth Center	Youth education and community development	Provides new experiences and opportunities for youth.	Educational activities, arts, science, physical fitness, field trips, community service projects and leadership opportunities.
Community Housing Works	Affordable Housing	Low-income families	Provides financial well-being programs, health and wellness programs, educational support, and supportive housing apartments with social services.
CSA San Diego County	Fair and Equal Housing	All residents	A non-profit organization dedicated to eradicating fair housing discrimination by enforcing the Affirmatively Furthering Fair Housing regulation.
Habitat for Humanity	Developer of Affordable Housing	Low-income families	Habitat for Humanity will serve as a CHDO developer with the Acquisition Rehabilitation for Homeownership Program
Metropolitan Area Advisory Committee on Anti-Poverty (MAAC Project)	Nonprofit Organization providing housing and transitional services	Low-income families	Provides affordable homes and support services such as employment training and financial education to help achieve housing stability.
My211	Online and phone resource directory	Nexus between community organizations and people to gain access to appropriate services.	Transitional housing and affordable housing directory, information on fair housing and housing resources for seniors and the disabled.
National City Housing Authority	Housing Resources	National City residents	Expand housing opportunities to very-low, low, and moderate-income families as well as provide affordable and accessible housing for special needs populations.

Table HE-31: Administrative Resources (Cont.)

Name	Purpose	Community Served	Resources Offered
Regional Continuum of Care Council (RCCC; CoC)/ Regional Task Force on the Homeless (RTFH)	Coordinates services and funding for the homeless to move people from homelessness to permanent housing.	Homeless persons	Rehabilitation services, employment training and placement, health services, and case management to move from homelessness to transitional housing, and then to supportive/permanent housing.
San Diego Regional Alliance for Fair Housing (SDRAFF)	Fair and Equal Opportunity Housing	All residents	Promotes fair housing education, training and advocacy. Oversees the preparation of the regional Analysis of Impediments to Fair Housing Choice.
South Bay Community Services	Rental Assistance	Children, Youth, Families, Domestic Violence Victims, Chronic Homeless Individuals	Administers the City's TBRA program. Provides educational and coaching services as well as programs benefiting families.
SpringBoard CDFI	Home Loans	First time home buyers in National City with a household income from 60%-80% of AMI (low-moderate income families)	Administers the City's First-Time Homebuyer Program to provide home ownership assistance by providing up to \$70,000 for down payment/ closing costs and through coaching.

SOURCE: NATIONAL CITY, CAPER FY 2018-2019, SEPTEMBER 2019; NATIONAL CITY, CITY WEBSITE HOUSING RESOURCES DIRECTORY PAGE, ACCESSED APRIL 21, 2020; NATIONAL CITY, ANNUAL ACTION PLAN (AAP) CITY FY 2018-2019, HUD PROGRAM YEAR 2018, JUNE 2018; SAN DIEGO HOUSING COMMISSION, CITY OF SAN DIEGO'S HOMELESS SHELTERS AND SERVICES PROGRAMS, WEBPAGE, ACCESSED APRIL 21, 2020; 211 SAN DIEGO, HOUSING RESOURCES, WEBSITE, ACCESSED APRIL 21, 2020; NATIONAL CITY, DRAFT CAPER FY 2019-2020, DECEMBER 2020



5. LAST CYCLE PROGRAM ACCOMPLISHMENTS

5.1. ANALYSIS OF LAST CYCLE

This section documents National City's achievements under the prior 5th Cycle Housing Element that covers the 2013-2021 planning period.

5.1.1. GOALS AND POLICIES

National City adopted the following goals to guide housing activities for the 5th Cycle planning period:

- » Goal 1: Maintain and enhance the quality of existing residential neighborhoods.
- » Goal 2: Conserve the affordability of the existing housing stock.
- » Goal 3: Increase the availability and affordability of safe and sanitary housing for all income groups, including providing adequate housing for households with special needs, such as the elderly, persons with disabilities, large families, single parent-headed households, and military personnel.
- » Goal 4: Provide a sufficient number of housing units and range

of housing types to meet the current and projected needs of all economic segments of the community.

- » Goal 5: The City shall promote and implement fair housing practices and equal access to housing opportunities for all income levels.
- » Goal 6: Enhance housing affordability through energy conservation techniques and design.

5.1.2. QUANTIFIED OBJECTIVES

Table HE-34 provides a summary of quantified objectives the City set in its 5th cycle and if the City has met those objectives, as reported in the Housing Element Annual Progress Reports (APRs).

Table HE-35 summarizes the remaining RHNA need from the past cycle's SANDAG allocation that was not constructed. As gathered from the CAPERs and APRs, a need of 1,068 units is remaining for the 2013-2020 RHNA; these units do not count toward the current cycle's RHNA objectives and are used as a metric to analyze the City's progress in achieving RHNA goals the previous year. The housing

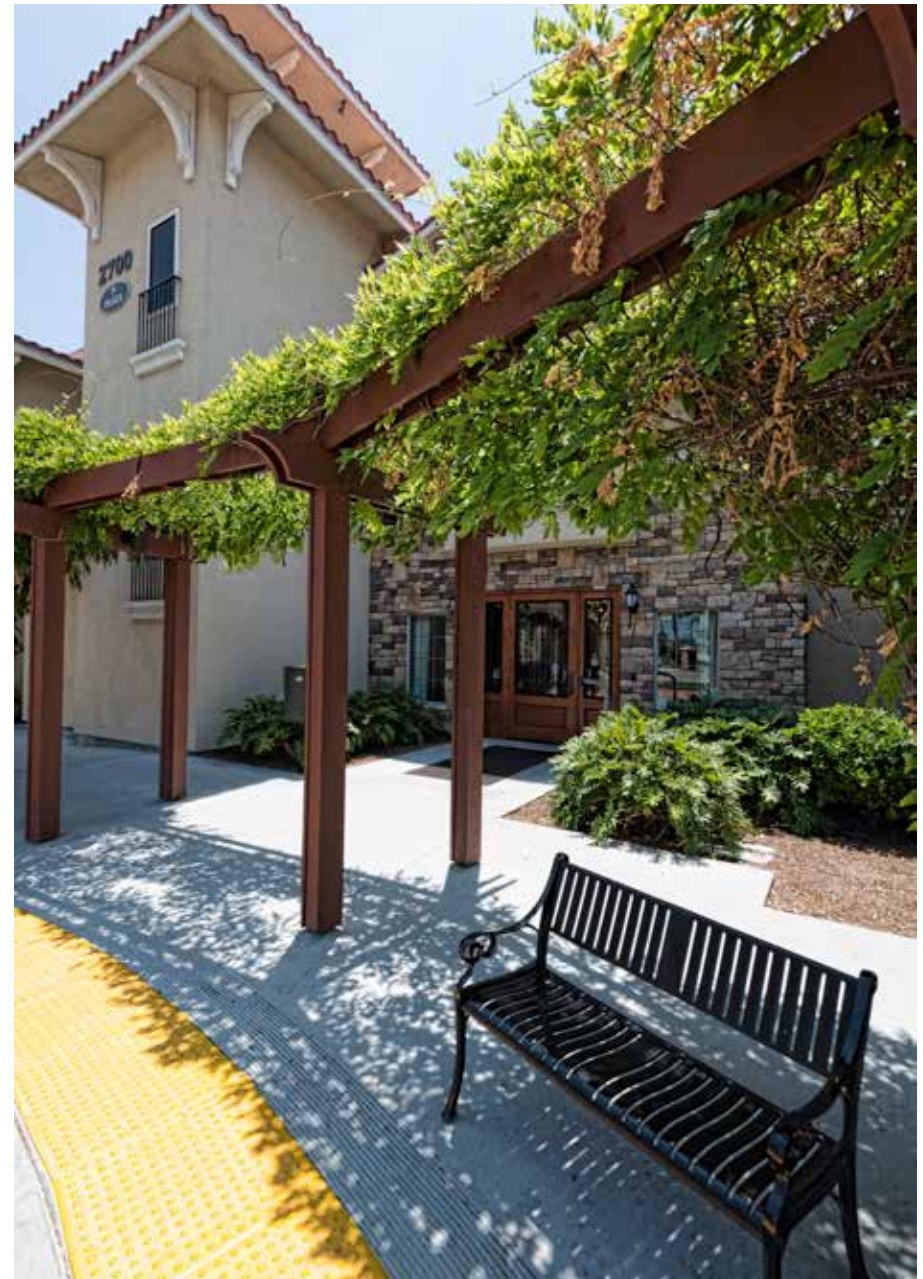


Table HE-37: Summary of Quantified Objectives and Accomplishments

	Objectives 2013-2020 (1)	Accomplish- ments Since 2013 (2)	Met Objective?
Units Constructed/Acquired			
Extremely-Low Income	233	23	No
Very-Low Income	226	22	No
Low Income	330	116	No
Moderate Income	327	163	No
Above Moderate Income	698	417	No
Units Repaired/Painted/Rehabilitated			
Acquisition & Rehabilitation	N/A for Cycle 6	91 (acquired 2018)	--
Rental Rehabilitation	80	138	Yes
Owner Rehabilitation	40	11	No
Unit Inspection/Code Enforcement			
Land Use/Community Conservation	2,000	1,362	No
Housing Inspections	1,024	1,728	Yes
Relocations due to Code Enforcement	As needed.	16	--
Housing Units to be Conserved (At-Risk)	795	766	No
Rental Assistance (Section 8)	2,034	1,123 (2019)	No
Programs (Events/Annual Outreach)			
Sample Housing Stock Survey	8	1	No
Residential Clean-Up	32	16	No
Community Housing Development Organizations Outreach	8	8	Yes

Table HE-32: Summary of Quantified Objectives and Accomplishments (Cont).

	Objectives 2013-2020 (1)	Accomplish- ments Since 2013 (2)	Met Objective?
Affordable New Construction Developers Outreach	8	8	Yes
Construction Assistance	8	8	Yes
Fair Housing Organizations	8	8	Yes
Community Land Trust Program	8	8	Yes
Reporting			
Housing Element Annual Report	8	8	Yes
SOURCE: (1) NATIONAL CITY, HOUSING ELEMENT 2013-2020, CHAPTER 6; (2) NATIONAL CITY, ANNUAL ELEMENT PROGRESS REPORTS: HOUSING ELEMENT IMPLEMENTATION (CCR TITLE 25 SECTION 6202), 2013-2019			

Table HE-38: Remaining Need from 2013-2020

Household Income (% AMI)	RHNA Allocation	Issued Building Permit 2013- 2020	Remaining Need*
Very-Low (0-50%)	465	45	420
Low (>50-80%)	353	116	237
Moderate (>80-120%)	327	163	164
Above Moderate (>120%)	718	471	247
Total	1,863	795	1,068
*Note = Remaining need takes the RHNA Allocation and accounts for all permitted units to calculate the remaining need.			
SOURCE: NATIONAL CITY, ANNUAL ELEMENT PROGRESS REPORT: HOUSING ELEMENT IMPLEMENTATION (CCR TITLE 25 SECTION 6202), 2019; NATIONAL CITY, BUILDING PROJECT ACTIVITY REPORT FOR RESIDENTIAL UNITS FOR 1/1/2013 THROUGH 4/28/2020, APRIL 2020			

market was only able to develop approximately 42 percent of its RHNA goal assigned to the City due to constraints from the market and government as identified in Chapter 2. Interviews with developers and local stakeholders, as detailed in Chapter 3, concluded that factors such as costs and politics from the discretionary process, development impact fees on infill lots, rent levels, construction costs, and parking requirements can burden developers and have played a role in discouraging development in the City.

5.1.3. PROGRAM EVALUATION

The City has demonstrated a great effort in working towards accomplishing many of the objectives set for all of the 24 programs of the past cycle. The City met 8 of its 24 program objectives with an emphasis on successful implementation of its target number of events and programs, as well as its achievement of its target number of rehabilitations and housing inspections.

As a part of analyzing prior programs, the element must provide an explanation of the effectiveness of goals, policies, and related action in meeting the housing needs of special needs populations. Table HE-34 provides an overview of the City's prior program accomplishments; achievements related to special needs populations are summarized below:

Seniors. As previously discussed in Chapter 2: Community Profile, National City has a significantly older housing stock built prior to the passage of the Americans with Disabilities Act (ADA) in 1990. Rehabilitation and physical improvements are important to ensure that housing is accessible to older populations. The City administered a Rental Rehabilitation Program (Program 1), which resulted in the rehabilitation of 506 rental units. The City also administered an Ownership Housing Rehabilitation Program (Program 2), which resulted in the rehabilitation of 11 single-family units. Securing

funding for and administering rehabilitation programs, however, has been increasingly challenging.

In addition, many seniors are on restricted incomes and in need of affordable housing options. The National City Housing Authority administers the Housing Choice Voucher Program (Program 6). Nearly 53 percent% of voucher users in the City have householders who are seniors and/or members with a disability. The At-Risk Housing Program (Program 5) also led to the preservation of 766 affordable units. In addition, the Extremely Low-Income Housing Program (Program 23) resulted in the production of 23 units affordable to extremely low incomes. While the units produced through these programs are not age-restricted, they do help to increase the supply of affordable housing that is potentially available to seniors who meet income requirements.

Persons with Disabilities. Persons with disabilities also benefit from housing rehabilitation. As previously discussed in Chapter 2: Community Profile, National City has a significantly older housing stock built prior to the passage of the Americans with Disabilities Act (ADA) in 1990. The Rental Rehabilitation (Program 1) and Ownership Rehabilitation (Program 2) programs resulted in physical improvements to 506 rental units and 11 ownership units. In addition, the Housing Choice Voucher Program (Program 6) also supports the needs of persons with disabilities; nearly 53% of voucher users in the City have householders who are seniors and/or members with a disability. The City also provided CDBG funds to community, social welfare, non-profit, and other charitable organizations that provide services for those with special needs in National City.

Large Households. Homes consisting of five or more members residing together typically lack adequately sized and affordable housing options. As previously discussed in Chapter 2: Community Profile, overcrowding is a challenge for National City residents. The

New Construction Program (Program 13) resulted in permits for 795 units; production, however, fell short of the City's 5th Cycle RHNA. Additional actions are needed to increase the housing supply and diversity of housing options to accommodate the needs for large households, such as incentives for Accessory Dwelling Units (ADUs) and incentives for housing with three bedrooms or greater.

Farm Workers. As previously discussed, farm workers are not a significant portion of the National City community. Their needs are accommodated through housing programs and policies that assist lower-income households in general rather than specialized programs, such as the At-Risk Housing Program (Program 5), which preserved 766 affordable units, New Construction Program (Program 13), which developed 324 affordable units, and Housing Choice Voucher Program (Program 6), which provided 1,123 total project- and tenant-based vouchers in 2019.

Single-Parent Households (Female-Headed). As discussed in Chapter 2: Community Profile, many single parent households, especially female-headed households, live in poverty due to low incomes and higher family expenses. The Housing Choice Voucher program (Program 6) provides an important resource for these and other lower-income households, including single-parent households. As a part of its Consolidated Plan and Annual Action Plan planning process, the City has used its HOME funds to administer a Tenant Based Rental Assistance (TBRA) program that has supported 23 families that are homeless or housing insecure and those families experience domestic violence with a combination of rental assistance, intensive case management, and supportive services. While this program is not listed in Table HE-35, it reflects the City's continued efforts to increase affordable housing options for special needs groups as opportunities arise.

Homeless. A lack of affordable housing for low- and moderate-incomes increases the number of persons whose incomes fall below the poverty level and may be housing insecure. The At-Risk Housing Program (Program 5) and New Construction Program (Program 13) have supported the preservation and expansion of the affordable housing supply, but the need continues to exceed available resources, Rental subsidies provided through the Housing Choice Voucher Program (Program 6) and TBRA (described above) have helped address housing insecurity, as well.

Military Personnel and College Students. These two groups are often constrained by lower incomes and an uncertain length of residency. As previously discussed in Chapter 2: Community Profile, the military is a significant employer in National City but many military personnel live off-base due to the lack of base housing. Similarly, many of the colleges in the San Diego region cannot provide on-campus housing facilities. The Production Priorities Program (Program 15) resulted in a mixed-use development project that includes micro-units that can potentially accommodate the needs of military personnel and college students.

While the City has made progress towards its goals to provide affordable housing, including housing for special needs populations, the overall need continues to exceed available resources. Each of the programs included in the 5th Cycle has been evaluated for inclusion in the 6th Cycle. Programs were removed if they constituted a routine function by the City or were no longer relevant based on City's funding resources and requirements. Programs were kept and/or consolidated into a revised or new program for the 6th Cycle. In addition, new and/or revised goals, policies, and programs have been identified to respond to the governmental and non-governmental constraints identified in previous sections of the Housing Element.

Table HE-39: Last Cycle Program Evaluations

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
1.	Rental Rehabilitation Program	Loans focused on health and safety and energy efficiency repairs and improvements for owners of rental housing in return for a deed restriction to maintain as affordable housing for low- or moderate-income households for a period of time depending on the funding source and loan.	Rehabilitate an average of ten units per year for a total of 80 units during the eight-year planning cycle.	Housing Authority	Tax credits; bonds; land subsidies.	A total of 506 units were rehabilitated during the 5th cycle. 368 rental units were rehabilitated in 2018 at the Summercrest Apartments, 130 rental units were rehabilitated in 2017 at Vista del Sol Apartments, and 8 were rehabilitated in 2013.
2.	Ownership Housing Rehabilitation Program	Loans and rebates to low- and moderate-income households to correct health and safety code violations, increase energy efficiency, and make other essential repairs such as: roof repair or replacement, electrical work, plumbing or structural repairs, room additions to lessen overcrowding, window repair or replacement, weatherization improvements, handicapped access improvements, and floor covering repair or replacement.	Rehabilitate an average of five units per year for a total of 40 units during the eight-year planning cycle.	Housing Authority	HOME; CDBG	11 single-family units were rehabilitated to-date during the planning cycle.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
3.	Code Enforcement Program	Enforcement of Land Use, Community Appearance and Conservation, Building and Safety, and Housing codes to diminish the proliferation of blight, stabilize property values through property maintenance and upkeep, enhance the community image as a safe and desirable place to reside, and eliminate lead hazards especially in residential dwelling units.	Abate an average of 250 cases per year for a total of 2,000 cases during the eight-year planning cycle.	Neighborhood Services Division	General Fund	Over 1,362 housing related code violations were abated during the planning cycle.
4.	Housing Inspection Program	Inspection of housing for compliance with code regulations.	Inspect an average of 128 units per year for a total of 1,024 units during the eight-year planning cycle.	Neighborhood Services Division	CDBG	Over 1,728 housing units were inspected during the planning cycle.
5.	At-Risk Housing Program	Identification, monitoring, and preservation of housing projects at risk of converting to market rate housing. Three federally assisted housing projects with a total of 795 units are at risk of converting to market rate. Detailed analysis of the potential conversion of these projects into market rate housing is provided in Chapter 2, Section E. The City will implement the following programs to preserve its affordable housing stock.	Conserve the affordability of 795 housing units at risk of converting to market rate. Monitor status of at-risk units annually during the eight-year planning cycle.	Housing Authority	Section 8 vouchers and certificates	268 Very-Low Income units were preserved in 2019 at Fairfield Park Villas, although they do not count towards the RHNA count of the 2013-2020 RHNA Allocation. 368 units preserved at Summercrest Apartments in 2018. 130 total units were preserved in 2017 at the Vista del Sol apartments. A total of 766 at-risk units were preserved during the 5th cycle.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
6.	Housing Choice Voucher (Section 8) Rental Assistance Program	Rental subsidies to low-income households that would otherwise spend more than 30 percent of gross income on housing expenses. The subsidy represents the difference between 30 percent of household monthly income and housing costs (maximum payment based on fair market rents). Tenant-Based - Vouchers issued to eligible households that locate their own housing. Project-Based - Guaranteed payment to owners that rent to eligible households.	Maintain 911 units of project-based housing and 1,123 tenant-based vouchers. Monitor annually during the eight-year planning cycle.	Housing Authority	Section 8; rents.	The City continued to maintain 149 project-based and 974 tenant-based vouchers (2019). From 2013 through 2015, 911 project based vouchers and 1,123 tenant based vouchers were maintained; while in 2016 through 2018 137 project based vouchers and 1,022 tenant based vouchers were maintained.
7.	Tenant Relocation Program	Partnerships with nonprofit organizations and social service agencies to assist tenants displaced as a result of code enforcement actions to find suitable and affordable replacement housing.	Relocate any tenants displaced due to code enforcement.	Housing Authority	CDBG	16 tenants were relocated during the planning cycle.
8.	Housing Stock Conditions Program	Sample survey of housing conditions to estimate rehabilitation and replacement needs with focus on areas with known housing problems.	Estimate of the number of dwelling units in need of repair or replacement. Conduct survey annually during the eight-year planning cycle.	Housing Authority	General Fund	The last survey was conducted in 2010.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
9.	Clean-Up Events Program	Residential clean-up and beautification events including landscaping, painting, trash removal, and yard clean-up.	Conduct an average of four events annually for a total of 32 events during the eight-year planning cycle.	Housing Authority	General Fund	16 clean-up events were hosted during the planning cycle.
10.	Developer Information Program	The preparation and maintenance of informational materials regarding residential development, including the specific plans, mixed-use zones, development standards, design guidelines, and density bonus provisions.	Update and maintain informational materials as policies, standards, guidelines, and ordinances are amended or adopted.	Planning Division	General Fund	Updates are ongoing as policies are amended or adopted, as necessary.
11.	GIS Database Program	Maintenance of Geographic Information System (GIS) database to provide current parcel information, including land use, zoning, development potential, site constraints, infrastructure, and an inventory of vacant and under-developed sites.	Update database as new information becomes available in a compatible format.	Planning Division	General Fund	Updates are ongoing as policies are amended or adopted, as necessary.
12.	Community Housing Development Organizations (CHDO) Program	Funding of CHDOs to assist in acquisition, development, and/or rehabilitation of affordable housing for lower-income households.	Identify and fund CHDOs to pursue affordable housing projects and programs.	Housing Authority	HOME	6 CHDO units are under construction during the planning cycle. The HOME program requires that 15% of HOME funds each year be reserved for the production of affordable housing by certified Community Housing Development Organizations (CHDO's).

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
13.	New Construction Program	Identification and solicitation of housing developers to construct affordable units and provision of assistance including consultation, site identification, site assembly, entitlement processing, and financial assistance.	Production of housing units to meet the RHNA allocation.	Housing Authority	LMIHf; HOME	Permits for 795 units were issued during the previous cycle, with 324 of those units qualifying as affordable units.
14.	Construction Assistance Program	Outreach program targeted at housing developers to provide information on available housing programs in the City or through State and Federal programs.	Development community awareness of available housing programs.	Housing Authority	General Fund	Ongoing through the annual budget and CIP adoption process at public workshops and hearings.
15.	Production Priorities Program	Identify development opportunities, programs, and incentives that implement Housing Element policies during pre-application discussions with developers.	Communicate housing policy objectives to prospective developers and encourage and facilitate projects that implement Housing Element policies.	Planning Division	General Fund	Ongoing outreach to communicate policy objectives to prospective developers. Following an RFP, the City transferred property to Protea National City, LLC for the development of 127 housing units in a mixed-use project in 2019.
16.	Housing Element Annual Report	A report of progress in meeting Housing Element goals and objectives including the number of affordable housing units permitted in the reporting year.	Submit report to Department of Housing and Community Development prior to the statutory deadline.	Planning Division	General Fund	An annual report has been submitted for the previous year to the HCD, OPR, and SANDAG every year from 2013-2019.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
17.	Design Guidelines Program	Pre-application meetings with developers to explain the Design Guidelines and encourage high quality development and design in construction.	Improvement in the quality of design in construction through the implementation of design guidelines.	Planning Division	General Fund	Ongoing implementation during the project consultation and entitlement process.
18.	Fair Housing Requirements Program	Preparation of an Analysis of Impediments (AI) to Fair Housing Choice in conjunction with the update of the Consolidated Plan, and implementation of actions identified in the AI to comply with federal requirements for participation in the CDBG and HOME programs.	Implement actions to address fair housing issues through CDBG and HOME activities.	Housing Authority	CDBG	The City made progress in addressing the priority needs, goals, and objectives outlined in the Action Plan that included activities that provided benefits primarily to low and moderate income individual and households. Provided fair housing services for an average of 148 residents per year. (CAPER, 2018-2019, 2017-2018, 2016-2017, 2015-2016).
19.	Fair Housing Organizations	Contract with the fair housing organizations to perform investigation, reporting, monitoring, dispute mediation, tenant counseling, landlord and manager training, and education on fair housing law.	Fair housing practices and informed housing consumers and suppliers.	Housing Authority	CDBG; Section 8	Addressed impediments to Fair Housing through the implementation of the Analysis to Impediments to Fair Housing Plan as reported in the Consolidated Annual Performance and Evaluation Report to the U.S. Department of Housing and Urban Development.
20.	Fair Housing Training Program	Property owner fair housing training of staff engaged in sale, rental, or lease of housing in new projects with 10 or more units.	In new projects of 10 or more units, training of staff in fair housing administration.	Housing Authority and contracted fair housing organizations	CDBG; Section 8	Ongoing fair housing services are provided by CSA San Diego County.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
21.	State Energy Conservation Program	Enforcement of State energy conservation standards for new housing through the development review process, permitting process, and enforcement programs.	Achieve State energy conservation standards for housing.	Building Division	General Fund	Ongoing implementation during the project consultation and entitlement process.
22.	Community Land Trust (CLT) Program	The establishment of community land trusts to preserve the long-term availability of land for affordable housing using the San Diego Community Land Trust model or similar program.	Allow the establishment of community land trusts as needed.	Housing Authority	CDBG, HOME, Private	In 2013, the Housing Element was updated to allow community land trusts. The City has entered into an Agreement with Habitat for Humanity and San Diego Community Land Trust to develop 6 to 12 units under the Community Land Trust model.
23.	Extremely-Low Income Housing Program	Encourage and facilitate the development of housing units for households earning 30 percent or less of the area median income (AMI) through outreach to housing developers, identifying funding sources, providing technical assistance, expediting processing, supporting funding applications, prioritizing budget allocations, and applying incentives through the density bonus provisions.	Production of 233 units of housing affordable to extremely-low income households	Housing Authority	CDBG, HOME, grants, other sources.	23 extremely low-income units were produced during the planning cycle.

Table HE-34: Last Cycle Program Evaluations (Cont).

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Evaluation
24.	Land Use Code Monitoring Program	As part of the General Plan Annual Progress Report, the City will monitor and report on the progress of the implementation of the Land Use Code through land use and development regulations, standards, and processes in the implementation of the General Plan, including Housing Element policies.	Implementation of the General Plan, including Housing Element policies.	Planning Division.	General Fund	The annual progress report was prepared for the previous calendar years and submitted to HCD, OPR, and SANDAG.
SOURCE: CITY OF NATIONAL CITY, HOUSING ELEMENT 2013-2020; CITY OF NATIONAL CITY, CONSOLIDATED ANNUAL PERFORMANCE REPORT (CAPER), CITY FISCAL YEAR 2018-2019 HUD PROGRAM YEAR 2018 (SEPTEMBER 2019); NATIONAL CITY, ANNUAL ELEMENT PROGRESS REPORT: HOUSING ELEMENT IMPLEMENTATION (CCR TITLE 25 SECTION 6202), 2013 THROUGH 2019						



ONE WAY

7th St

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6. HOUSING PLAN 2021-2019

6.1. OVERVIEW

This chapter states the City's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing. National City remains committed to furthering its housing opportunities and pursuing programs to address the housing needs of all residents. The following goals and policies are intended to address National City's housing and work in tandem with the other elements of the general plan.

6.2. GOALS AND POLICIES

Goal 1: Encourage the development of a diverse housing stock that can meet the needs of National City residents of all ages, abilities, and incomes.

- » Policy 1.1: Provide an adequate supply of land zoned for residential development to meet the projected housing need.
- » Policy 1.2: Promote the development of inclusionary, mixed

income housing throughout National City.

- » Policy 1.3: Encourage micro-unit housing and other residential housing models that create economies of scale, shared facilities, and supportive services to help meet the needs of specialized groups, such as the elderly, students, and lower-income individuals.
- » Policy 1.4: Promote the development of accessory dwelling units (ADUs) throughout National City to meet residential housing needs.

Goal 2: Encourage and facilitate the construction of new housing consistent with the City's RHNA allocation.

- » Policy 2.1: Promote residential development on underutilized land and remove barriers to infill development.
- » Policy 2.2: Encourage affordable housing on publicly-owned sites suitable for development and not needed for public use.
- » Policy 2.3: Allow additional floor area ratio (FAR)/density through mechanisms such as overlay zones for projects that provide smart growth benefits and/or are located in proximity to transit.

- » Policy 2.4: Support development standards to facilitate the development of quality housing and improve the character of neighborhoods.

Goal 3: Conserve the affordability of the existing housing stock and pursue strategies to address displacement.

- » Policy 3.1: Preserve “at-risk” affordable units through monitoring and partnering, working with nonprofits, and exploring available funding sources to preserve affordability.
- » Policy 3.2: Promote the practice of effective management in all rental housing projects in order to maintain and improve the quality of National City’s rental housing.
- » Policy 3.3: Require no net loss of residential units during the construction of new housing or rehabilitation of existing housing.
- » Policy 3.4: Require the replacement of existing affordable units to the same or lower income level as a condition of development.
- » Policy 3.5: Unless otherwise required, provide initial preference to National City residents for any project assisted with Housing Authority funds unless otherwise prohibited by the funding source.

Goal 4: Enhance the quality of National City’s existing neighborhoods.

- » Policy 4.1: Facilitate property conservation and community enhancement through the implementation of objective design standards, land use regulations and programs, and State housing law.
- » Policy 4.2: Prevent building deterioration and promote the maintenance and repair of existing renter- and owner-occupied housing through education and training programs.
- » Policy 4.3: Encourage incorporating accessibility improvements and universal design features into rehabilitation projects to increase access for seniors and people with disabilities.
- » Policy 4.4: Promote the replacement of substandard units that

cannot be feasibly rehabilitated.

Goal 5: Promote and implement fair housing practices and equal access to housing opportunities for all income levels.

- » Policy 5.1: Affirmatively further fair housing choice in National City.
- » Policy 5.2: Support fair housing programs and provide residents fair housing information for low-income properties.
- » Policy 5.3: Foster an integrated development pattern that encourages housing, especially affordable housing, within proximity to transit, schools, employment centers, parks, and other resources.
- » Policy 5.4: Support increased homeownership across all income levels for National City residents.

Goal 6: Support programs for housing vulnerable and special needs populations.

- » Policy 6.1: Encourage the development of housing that is accessible to special needs residents, including seniors, disabled veterans, the homeless, and transitional foster youth, through measures such as transitional supportive housing, ensuring reasonable accommodation, and the provision of emergency shelters.
- » Policy 6.2: Encourage the development of supportive services and facilities that are linked with and in close proximity to affordable housing for vulnerable populations.
- » Policy 6.3: Support a continuum of accessible housing options for homeless individuals and families, including rapid re-housing, emergency shelters, transitional housing, and permanent supportive housing. Strive for sufficient short- and long-term housing for vulnerable populations.

Goal 7: Promote an economically viable, environmentally conscious, and socially equitable land use and development pattern.

- » Policy 7.1: Provide incentives for housing and mixed-use

development at major transit nodes, along transit corridors, and in other locations suitable for high-intensity housing development, as appropriate.

- » Policy 7.2: Improve infrastructure to support infill development and promote new affordable housing near transit stations, major transit stops, and along transit corridors.
- » Policy 7.3: Support new financing tools and methods that provide the infrastructure needed to support transit-oriented and mixed-use infill development.
- » Policy 7.4: Encourage measures that supplement Title 24 and support progress towards National City's sustainability and Climate Action Plan (CAP) goals.

6.3. IMPLEMENTATION PROGRAMS

The goals and policies contained in the Housing Element are implemented through a series of housing-related programs. State law and guidelines from the California Department of Housing and Community Development require Housing Elements to include programs with identified:

- » Immediate, short-term, and long-term actions;
- » Proposed measurable outcomes;
- » Definite timeframes for implementation;
- » Agencies and officials responsible for implementation;
- » Descriptions of the local government commitment to implement programs through specific actions in adequate detail; and
- » Specific funding sources to implement the program, if relevant.

Table HE-37 outlines the Housing Element Programs that have been identified to implement one or more of National City's housing-related goals and policies. Programs include a combination of on-going, near-term, and long-term actions.

6.4. QUANTIFIED OBJECTIVES

The quantified objectives of the 2021-2029 Housing Element are summarized in Table HE-38.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
1.	Housing Production Monitoring Program	Create an interdepartmental team consisting of the Planning Department, Housing Authority, and other relevant departments to monitor progress towards the City's RHNA allocation. Track the availability of sites, such as those included in the Housing Element Site Inventory, for residential development. Gather, track, and report data annually on development permits and construction. Compile information into a report, per HCD requirements, describing progress towards meeting Housing Element goals and objectives including the number of affordable housing units permitted in the reporting year.	Submit report to Department of Housing and Community Development prior to the statutory deadline.	Planning Division; Housing Authority	General Fund	Prepare and submit a report annually pursuant to statute during the eight-year planning cycle.
2.	Housing Choice Voucher (Section 8) Rental Assistance Program	Rental subsidies to low-income households that would otherwise spend more than 30 percent of gross income on housing expenses. The subsidy represents the difference between 30 percent of household monthly income and housing costs (maximum payment based on fair market rents). Tenant-Based - Vouchers issued to eligible households that locate their own housing. Project-Based - Guaranteed payment to owners that rent to eligible households.	Maintain 911 units of project-based housing and 1,123 tenant-based vouchers. Outreach and education on the the State Source of Income protection SB 329 and SB 322 that recognizes public subsidies (including Section 8) as a legitimate source of income for rent payments.	Housing Authority	Section 8; rents.	Monitor annually during the eight-year planning cycle.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
3.	First-Time Homebuyer Program	Provide first-time homebuyer assistance to low and moderate income households to achieve homeownership	Assist an average of 2 households per year for a total of 16 households during the eight-year planning period.	Housing Authority	CDBG; HOME	An average of 2 households per year for a total of 16 households during the eight-year planning period.
4.	Fair Housing Program	<p>Address the recommendations developed in the Regional Analysis of Impediments to Fair Housing Choice to mitigate and/or remove fair housing impediments. Implement actions to address fair housing issues through CDBG and HOME activities. Contract with the fair housing organizations to perform investigation, reporting, monitoring, dispute mediation, tenant counseling, landlord and manager training, and education on fair housing law. Property owner fair housing training of staff engaged in sale, rental, or lease of housing in new projects with 10 or more units. Adopt a source of income protection ordinance.</p> <p>National City is also identified as having an over-concentration of Section 8. Engage in on-going regional coordination to promote voucher use in other locations to allow residents to have better choices for their housing options/locations. Conduct periodic testing of discrimination.</p>	Improve fair housing practices and programs in the City.	Housing Authority	CDBG, HOME, grants	<p>Implement on an on-going basis during the eight-year planning period.</p> <p>Adopt a source of income protection ordinance within the first two years of the eight-year planning period.</p> <p>Conduct bi-annual or periodic testing of discrimination.</p>

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
5.	Community Housing Development Organizations (CHDO) Program	Funding of CHDOs to assist in acquisition, development, and/or rehabilitation of affordable housing for lower-income households.	Identify and fund CHDOs to pursue affordable housing projects and programs.	Housing Authority	HOME	Conduct outreach annually as part of the budget process and/or as funding sources become available during the eight-year planning cycle.
6.	Community Land Trust (CLT) Program	The establishment of community land trusts to preserve the long-term availability of land for affordable housing using the San Diego Community Land Trust model or similar program.	Allow the establishment of community land trusts as needed.	Housing Authority	CDBG; HOME; Private	Conduct outreach annually as a part of the budget process and/or as funding sources become available during the eight-year planning cycle.
7.	Housing Education and Resource Outreach	Host events and provide informational materials providing education to residents regarding residential development, tenant and homeowner rights and requirements, resources available to residents experiencing hardship or who are looking for guidance, and home purchasing and renovation/rehabilitation guidance. Host events and disseminate this information in both English and Spanish.	Host 2 events annually to provide outreach to residents.	Housing Authority	CDBG, HOME, grants, other sources.	Host 2 outreach and education events annually.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
8.	Focused General Plan and Climate Action Plan (CAP) Update – Infill and Transit-Oriented Development Opportunities	Analyze areas of the city that have access to transit, services, and commercial/retail for the potential to further increase allowable housing density and foster additional development capacity. Promote a compact, integrated pattern of development that also supports the City's CAP goals to reduce greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). Establish land use, circulation, and CAP goals and policies to promote the location of deed-restricted affordable housing in transit-oriented areas as GHG reduction tool.	Update the Land Use Element, Circulation Element, and CAP to increase housing opportunities near transit for all residents. Recognize the role of affordable housing in helping the City meet both its RHNA obligations and CAP goals.	Planning Division	SB 2 and LEAP	Complete within the first two years of the eight-year planning period.
9.	Complete Communities Incentive Program	Create an opt-in program that provides additional incentives beyond the State Density bonus to encourage developers to reserve a percentage of units in new market-rate developments for affordable housing. Offset developer costs through incentives and additional density to build housing at below-market prices.	Promote voluntary inclusionary housing and progress towards National City's RHNA for all incomes.	Planning Division; Housing Authority	SB 2 and REAP Funds	Adopt program within the first two years of the eight-year planning period.
10.	Development Impact Fee (DIF) Unit of Measurement Change	Change Development Impact Fees to be based on square-footage of a unit rather than number of units.	Revise fee structure to encourage the production of additional housing units.	Planning Division	General Fund	Complete within the first two years of the eight-year planning period.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
11.	Accessory Dwelling Unit (ADU) Ordinance	Adopt an Accessory Dwelling Unit (ADU) Ordinance. Modify development standards such as lot coverage and setbacks.	Create standards and incentives to promote the development of ADUs for residential uses.	Planning Division	SB 2 and LEAP Funds	Complete within the first two years of the eight-year planning period.
12.	Parking Study	Conduct a parking study to assess the feasibility of creating flexible parking standards, especially in areas served by high-quality transit. Evaluate reduced parking ratios in strategic areas within proximity to transit, such as Transit Priority Areas (TPAs).	Evaluate reduced parking requirements in strategic areas to encourage development.	Public Works	SB 2 Funds	Complete the study within the first two years of the eight-year planning period.
13.	Objective Design Standards	Adopt Objective Design Standards for multi-family residential development projects.	Streamline the processing of multi-family projects.	Planning Division	General Fund; SB 2 Funds	Complete within the first two years of the eight-year planning period.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
14.	Municipal Code Update	<p>Update the Municipal Code to provide for a variety of housing types, consistent with State Law. Address State legislation related to:</p> <ul style="list-style-type: none"> » Accessory Dwelling Units (ADUs); » Low Barrier Navigation Centers; » Emergency Shelters (parking); » Single-Room Occupancy (SRO) Units; and » Employee Housing. <p>Incorporate other changes consistent with State Law, including the by-right approval for qualifying sites reused from the 4th and 5th Housing Element Cycles, if the project includes 20% affordable housing. Formally adopt reasonable accommodation procedures to address the needs of households with disabilities.</p> <p>Create a regulatory process to allow the conversion of underutilized land, such as parking lots associated with places of worship and shopping centers, to housing in residential and mixed-use zones and/or other key areas such as Transit Priority Areas (TPAs). In addition, add the State Density Bonus to the Municipal Code so that it is easy to understand and implement.</p>	Remove barriers to housing production and encourage the development of underutilized land.	Planning Division	General Fund; SB 2 Funds	Complete within the first two years of the eight-year planning period.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
15.	Development Streamlining and Processing Revisions	Streamline permitting processes and ensure consistent project evaluation. Per SB 35, provide streamlined development review and processing for proposed developments with at least 10% affordability. Adopt procedures, including eligibility criteria and a checklist, for applicants to request streamlined approval.	Remove governmental barriers to housing production.	Planning Division	General Fund; SB 2 Funds	Complete within the first two years of the eight-year planning period.
16.	Housing Unit Replacement Program	Update the Municipal Code to require that applicants demonstrate during the review process that there will be no net loss of housing units as a result of the proposed project. For applicants using Density Bonus Law, require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in Government Code 65915(c)(3).	Ensure no net loss of housing units as a result of future development.	Planning Division	General Fund; SB 2 Funds	Complete within the first two years of the eight-year planning period.
17.	Developer Information Program	Prepare and maintain informational materials regarding residential development, including the specific plans, mixed-use zones, development standards, design guidelines, and density bonus provisions. Conduct regular outreach and provide presentations to development-oriented organizations such as the Urban Land Institute.	Update and maintain informational materials as policies, standards, guidelines, and ordinances are amended or adopted.	Planning Division; Housing Authority	General Fund	Implement on an on-going basis during the eight-year planning period.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
18.	Housing Strategic Plan	Develop a Housing Strategic Plan specific to the National City Housing Authority that provides guidance for the utilizing the City's real estate and financial assets for housing purposes. Provide a work plan for the Housing Authority to make progress towards the goals and objectives of this 6th Cycle Housing Element.	Provide a work plan for the National City Housing Authority to make progress towards Housing Element goals and objectives.	Housing Authority	General Fund	Complete within the first two years of the eight-year planning period.
19.	Home Repair Loan Program	Establish a program for lower-income residents to request low-interest loans to fund home repairs for health and safety items, including roof repair and heating, electrical, or plumbing systems.	Provide loans to 5 lower-income households to address substandard housing conditions.	Housing Authority	CDBG; HOME	Implement on an on-going basis during the eight-year planning period.
20.	At-Risk Inventory and Monitoring Program	Maintain an inventory of publicly assisted units that are deed restricted for long-term affordability. Currently, no publicly assisted units are considered at risk of converting to market rate housing between April 15, 2021 and April 15, 2029.	Monitor and preserve the affordability of all publicly assisted housing units.	Housing Authority	General Fund	Implement on an on-going basis during the eight-year planning period.

Table HE-40: Housing Element (6th Cycle) Implementation Programs

No.	Program Name	Description	Objective	Responsible Agency	Funding Source(s)	Schedule
21.	Affordable Housing Priority Production	<p>Facilitate affordable housing development in National City for lower and moderate-income households, including households with special needs.</p> <p>Provide technical assistance to non-profit organizations and housing developers on zoning and density bonus incentives. Conduct annual outreach to non-profit organizations and housing developers to identify potential partnership opportunities, as well. Develop a process for providing streamlined review for projects that provide affordable housing units.</p> <p>Additionally, support applications for affordable housing funds for projects or programs that are consistent with the goals and objectives of the Housing Element. Conduct annual research to identify potential funding sources to support the development of deed-restricted housing for extremely low and very low incomes.</p>	Facilitate progress towards the City's lower and moderate-income RHNA.	Housing Authority	General Fund, SB 2, grants, and other sources	Implement on an on-going basis during the eight-year planning period.

Table HE-41: Housing Element (6th Cycle) Quantified Objectives

	Extremely Low	Very-Low	Low	Moderate	Above Moderate	Total
New Construction	387	258	506	711	3575	5437
First-Time Homebuyer Program		16			0	16
At-Risk Housing Preservation	0			0	0	0
Rental Assistance (Section 8)	1123			0	0	1123
Rehabilitation (Home Repair Loans)	17			0	0	17

APPENDIX A: AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) ASSESSMENT

AFFIRMATIVELY FURTHERING FAIR HOUSING

INTRODUCTION

In 2017, the California legislature passed Assembly Bill 686 (AB 686). The bill aims to ensure California cities are taking active steps to affirmatively further fair housing in their communities through the implementation of their Housing Elements. AB 686 requires all cities to include a robust analysis of local conditions that lead to barriers to access of fair housing for community members, especially those belonging to protected classes. This analysis entails an assessment of fair housing within the city, accomplished through critically examining integration and segregation, racially and ethnically concentrated areas of poverty, access to opportunities, disproportionate housing needs, and other relevant factors. The assessment also includes a roadmap of goals and actions the city will take to affirmatively further fair housing in their jurisdiction.

OUTREACH

Outreach Strategy and Methods

In order to ensure the Housing Element reflects and meets the needs of the National City community, public input was sought throughout the update process. Multiple rounds of outreach were conducted using diverse methods. Due to the COVID-19 pandemic, which occurred throughout the entirety of the Housing Element update and resulted in in-person activities being prohibited, all outreach efforts were shifted to virtual formats. These outreach efforts included stakeholder interviews, an online survey, two rounds of webinars that incorporated opportunities for live audience participation, office hours, and city meetings.

The community engagement was designed to be accessible to all members of the community. National City has a significant population of Spanish speakers; outreach materials and events were thus designed to support language access. All webinars were translated live into Spanish and interpreters were available to translate questions posed in Spanish into English so that English-speaking staff could answer. Furthermore, one “Spanish-only” webinar was held and conducted entirely in Spanish. The summaries of the webinars, as well as the questions and answers, were posted on the city’s website in both Spanish and English. The online survey and all outreach materials were produced in both Spanish and English.

In order to further facilitate engagement from diverse members of the community and accommodate different schedules, the webinars were held on both weekdays and weekends, and were scheduled during the day and in the evening. Virtual office hours where community members could call staff and members of the project team were held during different times of different days as well. These office hours served both as an avenue for community members to engage more thoroughly with staff and as a way to address the digital divide and ensure

those without access to the internet or a computer could still actively participate in the outreach process.

Focused efforts were made to encourage all members of the National City community to participate and to ensure everyone who lives in the city was represented in the engagement process. Postcards with information about how to participate in the Housing Element update, in both English and Spanish, were sent to every National City resident and business; these postcards were sent out in two rounds that coincided with each round of webinars. Workshops were also advertised on the National City website, the project website, National City social media accounts, and the National City email distribution list. Drafts of the Housing Element were posted on the city's website prior to each round of webinars to ensure that community members could review and ask any questions directly.

Recognizing that effective outreach involves a diligent and broad effort to engage the community, the project team conducted an interactive survey. This survey strayed away from the traditional multiple choice and ranking questions, and rather entailed engaging activities and simulations, such as a mobility marker exercise, a rate housing types by density and location exercise, and a housing budget activity with housing improvement actions prioritization.

Stakeholder interviews were conducted with local nonprofit housing organizations, affordable housing developers, SANDAG staff, advocacy groups, and homelessness service providers. A full list of organizations contacted and interviewed is included in Table A- 1. The purpose of these interviews was to gain information about strategies and ideas to increase affordable housing development, preserve affordability of the existing housing stock, reduce homelessness and increase homeownership, and improve the existing housing stock. Feedback on the draft Housing Element was solicited at Housing Committee, City Council, and Housing Advisory Committee meetings on the following dates:

- June 1, 2020: Housing Advisory Committee
- August 17, 2020: Housing Advisory Committee
- October 19, 2020: Housing Advisory Committee
- January 26, 2021: Joint City Council and Housing Advisory Committee
- June 7, 2021: Joint Housing Advisory Committee and Planning Commission

In addition to outreach conducted specifically for the Housing Element update, feedback from community engagement for the National City Consolidated Plan was also taken into consideration. This engagement took place just before the Housing Element update outreach, in February, March, and April 2020. This outreach included a community needs survey (in both Spanish and English) and stakeholder interviews with homelessness services providers, local nonprofit housing organizations, advocacy groups, and local service providers. The purpose of these interviews was to gain information about support that National City can provide to the stakeholders, their critical needs, and programs to meet community development and housing needs were discussed.

Table A- 1: List of Organizations Interviewed

Organization
Chelsea Investment Corporation
Circulate San Diego
Climate Action Campaign
Environmental Health Coalition
KirE Builders
MAAC
Malick Infill
Regional Task Force on the Homeless
San Diego Habitat for Humanity
San Diego Housing Commission
SANDAG
Springboard Home Loans
Urban Housing Partners

Summary of Comments

Comments received during all stakeholder interviews, webinars, surveys, office hours, and City meetings can be grouped into the following topics:

- Affordability
 - Increase the amount of affordable housing in the city and preserve existing affordable housing
 - Encourage the construction of accessory dwelling units (ADUs) as they present a strong opportunity to facilitate smaller scale resident-driven affordable housing construction
- Existing housing stock
 - Maintain and enhance the existing housing stock to ensure that all housing positively contributes to the community
- Development
 - Reduce permitting and discretionary review times and fees
 - Reduce development requirements and revising development standards, such as parking
 - Prioritize housing development in locations away from sources of pollution in order to avoid co-location issues with existing land uses
 - Encourage density in strategic areas
 - Focus new housing construction in transit-accessible areas
 - Promote comprehensive parking management strategies and coordination of parking with planned transit investments
- Provision of housing
 - Reduce homelessness
 - Increase homeownership rates

- Provide priority to existing National City residents in new housing

During the Housing Element update, all comments received were considered. Goals and policies of the Housing Element were developed after the majority of the outreach had been completed so that they reflected community feedback. Input was also incorporated into the Housing Element programs. A summary of how each common topic comment was incorporated is as follows:

- **Affordability.** Several Housing Element goals and policies directly involve maintaining existing affordable housing, replacing affordable housing units lost due to new development, promoting the construction of accessory dwelling units, and preserving “at-risk” affordable units. Housing Element Goals 1 and 3 and Policies 1.3, 1.4, 2.2, 3.1, 3.3, 3.4, and 5.3 all address this topic. Programs 5, 6, 7, 9, 11, 14, and 15 all address this topic as well.
- **Existing Housing Stock.** Maintaining and enhancing the existing housing stock is identified as a priority in multiple goals, policies, and programs. Strategies include preserving units, promoting effective management in all rental properties, preventing building deterioration and promoting maintenance and repair, promoting the replacement of substandard units, and hosting informational events about property renovation and rehabilitation. Goals 3, 4 and Policies 3.2, 4.1, 4.2, 4.3, 4.4 all address this topic. Programs 5 and 7 address this topic as well.
- **Development.** Many goals, policies, and programs in the Housing Element address community comments related to development. Examples include adopting objective design standards, conducting a parking study, changing Development Impact Fees to be based on square footage, and selecting site inventory sites that are in existing mixed-use and residential areas and do not abut industrial land uses. Goals 2 and 7 and Policies 2.1, 2.3, 5.3, 7.1, 7.2, and 7.3 all address this topic. Programs 1, 8, 10, 12, 13, 14, 15 address this topic as well.
- **Provision of Housing.** The provision of housing was a broad but important topic identified by many community members and stakeholders throughout the engagement process; the Housing Element update includes numerous strategies to address community comments. These strategies include providing initial preference to National City residents for any project assisted with Housing Authority funds, encouraging supportive services close to affordable housing for vulnerable populations, supporting accessible housing options for homeless individuals and families, and providing first-time homeowner assistance to low- and moderate-income households. Goals 6 and 7 and Policies 3.5, 5.4, 6.1, 6.2, and 6.3 all address this topic. Programs 3 and 7 address this topic as well.

Barriers to Participation

While the community engagement process was designed to be accessible and facilitate as much participation as possible, there were several barriers to participation. The most notable barrier was the COVID-19 pandemic, which began just before the community engagement phase started and lasted through the entirety of the Housing Element update. Due to the

pandemic, engagement events could not be held in person; all events were conducted virtually. While this virtual setting may have contributed to a lack of participation of certain individuals, such as those without access to internet or a computer, it also allowed for increased participation of other individuals, such as those with mobility and transportation difficulties, single parents, and those with busy employment schedules or multiple jobs. It can often be more convenient for community members to participate remotely in an outreach event than to travel to a location and participate in person. Thus, the engagement process being virtual due to the COVID-19 pandemic served both as a barrier to and an opportunity for participation.

Another issue that likely contributed to a lack of participation was community members being unaware of the public meetings. For example, some residents who received postcards in the mail about ways to provide input may not have looked at them or may have perceived them to be junk mail or advertising at first glance. Similarly, members of the community without a National City address, such as those experiencing homelessness, would not have received a postcard. Opportunities to improve future planning project participation of individuals and families experiencing homelessness include distributing informational flyers at homelessness service centers and emergency shelters.

ASSESSMENT OF FAIR HOUSING ISSUES

Enforcement and Outreach

San Diego County jurisdictions are served by two fair housing service providers, CSA San Diego and Legal Aid Society of San Diego (LASSD), that investigate and resolve discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. These service providers also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. National City is served by CSA and LASSD.

Walk-in services are offered at three LASSD office locations in San Diego County- Southeast, Midtown, and North County. In addition, LASSD has established a Fair Housing Hotline to ensure its Fair Housing services are readily available to the community and that a resident may promptly report any act of housing discrimination that may have occurred.

Between 2014 and 2018, CSA served 688 National City residents, accounting for 11% of clients served in San Diego county. Between 2014 and 2020, LASSD served 557 National City residents, or 3% of all clients served in San Diego County.

(HUD) maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. From October 1, 2014 to September 30, 2019, 414 fair housing complaints in San Diego County were filed with HUD. Roughly three percent (eleven

cases) were filed by National City residents. Disability-related discrimination was cited in 10 out of 11 cases in National City.

The 2020 Regional Analysis of Fair Housing Choice (2020 Regional AI) found that enforcement services were inadequate in the region. In FY 2020, National City tested for discrimination based on disability, national origin and race. Of the six sites tested, three showed unequal treatment; one based on national origin and two based on race. The City will work with the County Housing and City of National City Housing Element Community Development (County HCD) as the lead for Urban County CDBG program, to ensure increased fair housing outreach, education, and enforcement activities take place in National City.

The 2020 Regional AI also found that outreach services were inadequate in the region as residents may find it hard to navigate the service system and identify the appropriate agency to contact. National City advertises fair housing services through placement of a fair housing services brochure at public counters and will include a link to CSA and LASSD on its website within the first six months of the 8-year planning cycle. The City will advocate the County to include systematic testing in its Fair Housing Program. In addition, the City has recently hired a Housing Programs Specialist whose responsibilities will include Fair Housing Program outreach.

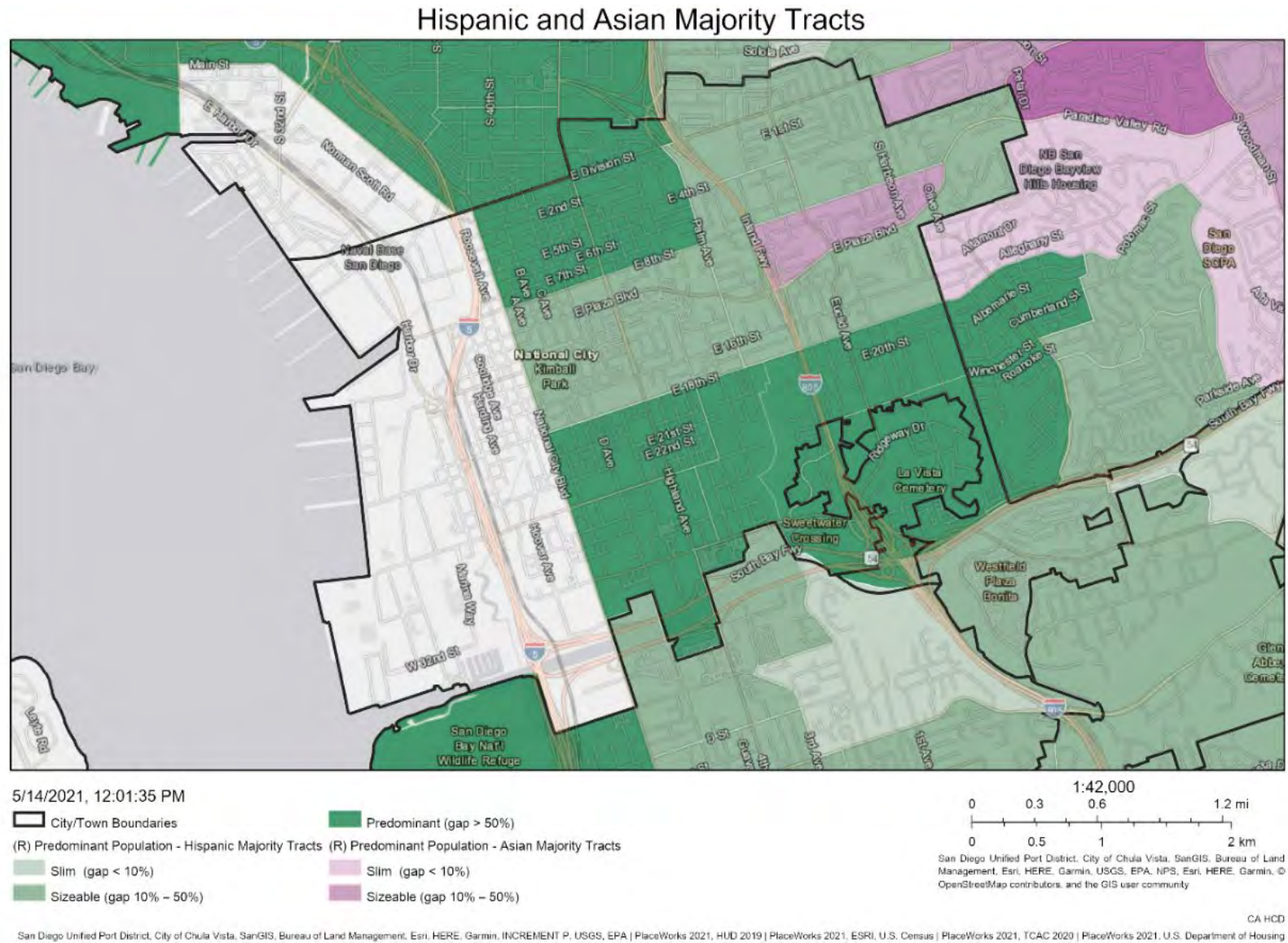
Integration and Segregation

Race and Ethnicity

National City is a majority-minority city with the Hispanic population representing a significant portion of the citywide population. As shown in Figure A- 1, all census tracts (except census tract 06073021900, which has primarily industrial and military uses) are characterized by a majority ethnic or racial group. The strength of color indicates the magnitude/size by which each race or ethnicity is predominant over the next populous. All but one of these census tracts have a majority Hispanic population; one census tract has a majority Asian population. Census tracts in the northern and southern portions of the city have the highest proportion of Hispanic residents. All census tracts within the city with a majority Hispanic population border at least one other census tract with a majority Hispanic population; the racial concentration trends in National City are thus prevalent throughout the surrounding area as well. Furthermore, Figure A- 3 shows the percentage of the nonwhite population in each census tract; the entirety of National City and all nearby census tracts are at least 41% nonwhite, with the majority being over 81% nonwhite. As shown in Figures A- 2 and A- 4, National City has a significantly higher concentration of nonwhite residents than the region.

The California Tax Credit Allocation Committee (TCAC)/California Department of Housing and Community Development (HCD) Opportunity Maps do not show any areas of high segregation and poverty within National City. These areas are regionally concentrated in southern San Diego county, with several nearby or adjacent to National City in the City of San Diego.

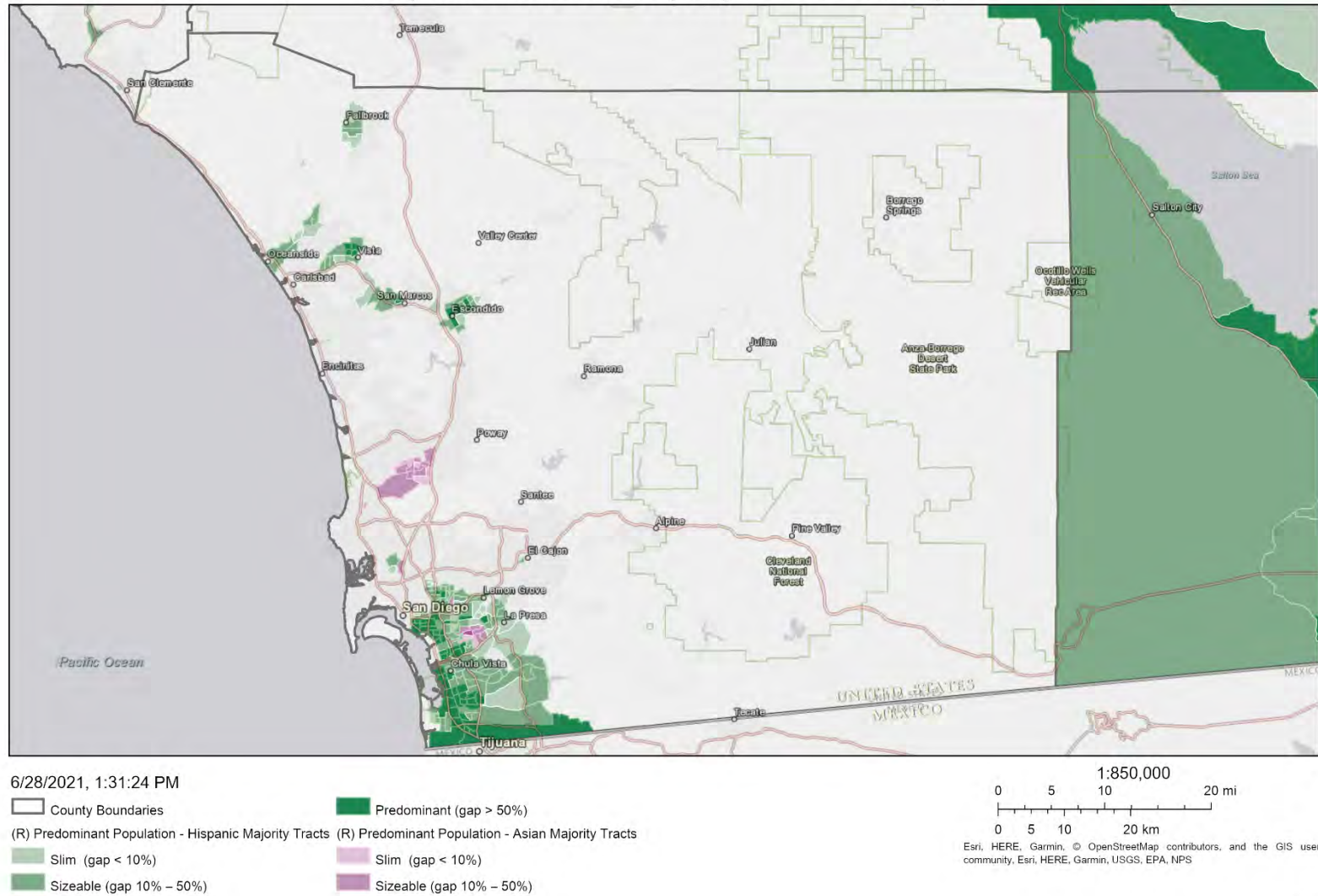
Figure A- 1



Source: HCD AFFH Data Viewer, Predominant Population – Hispanic Majority Tracts, Predominant Population – Asian Majority Tracts, US Census, TIGER, 2010.

Figure A- 2

Hispanic and Asian Majority Tracts - County

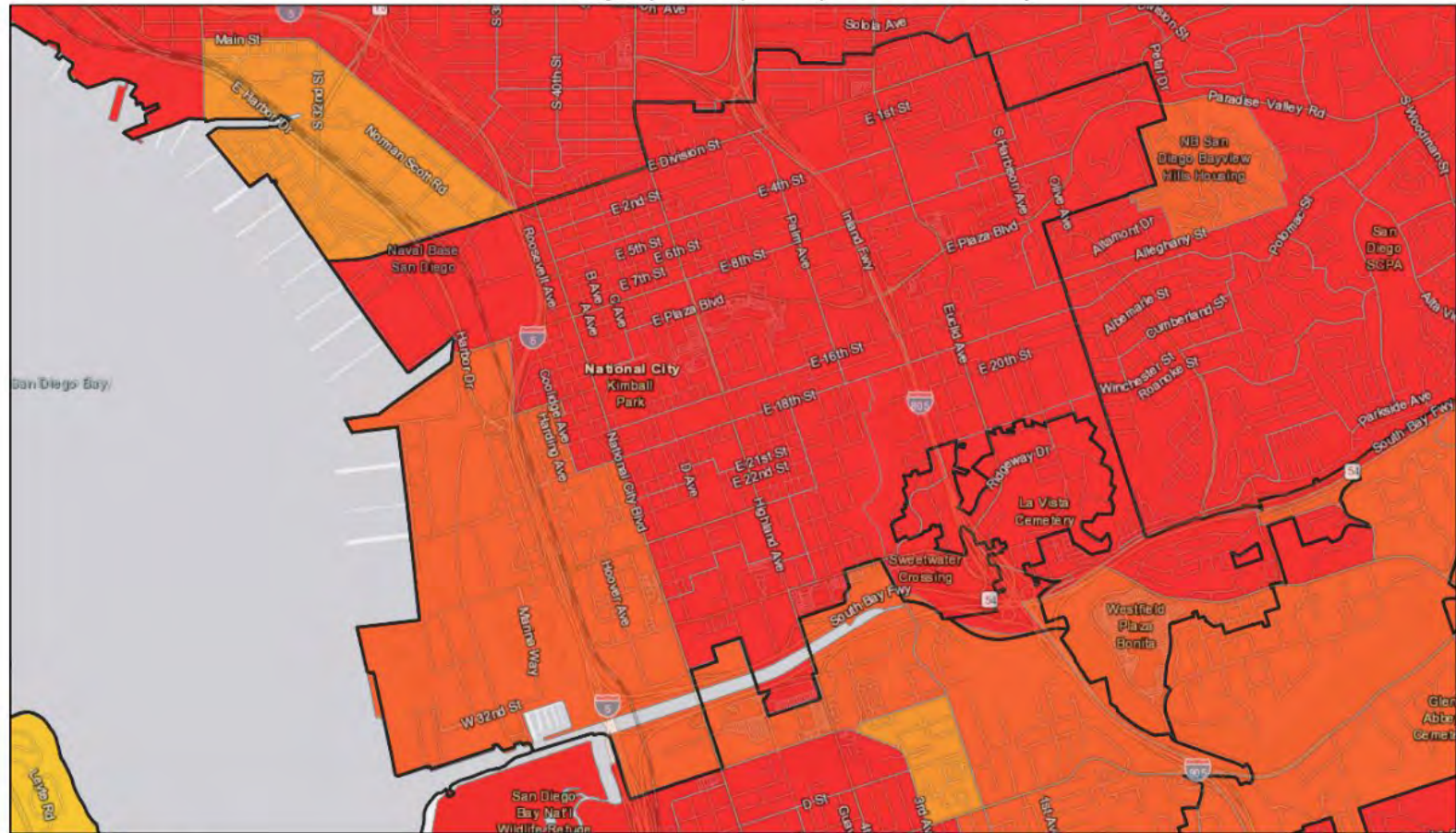


CA HCD
Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Predominant Population – Hispanic Majority Tracts, Predominant Population – Asian Majority Tracts, US Census, TIGER, 2010.

Figure A-3

Racial Demographics (2018) - Block Group



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City/Town Boundaries

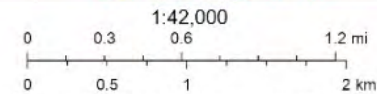
(R) Racial Demographics (2018) - Block Group

21 - 40%

41 - 60%

61 - 80%

> 81%



San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

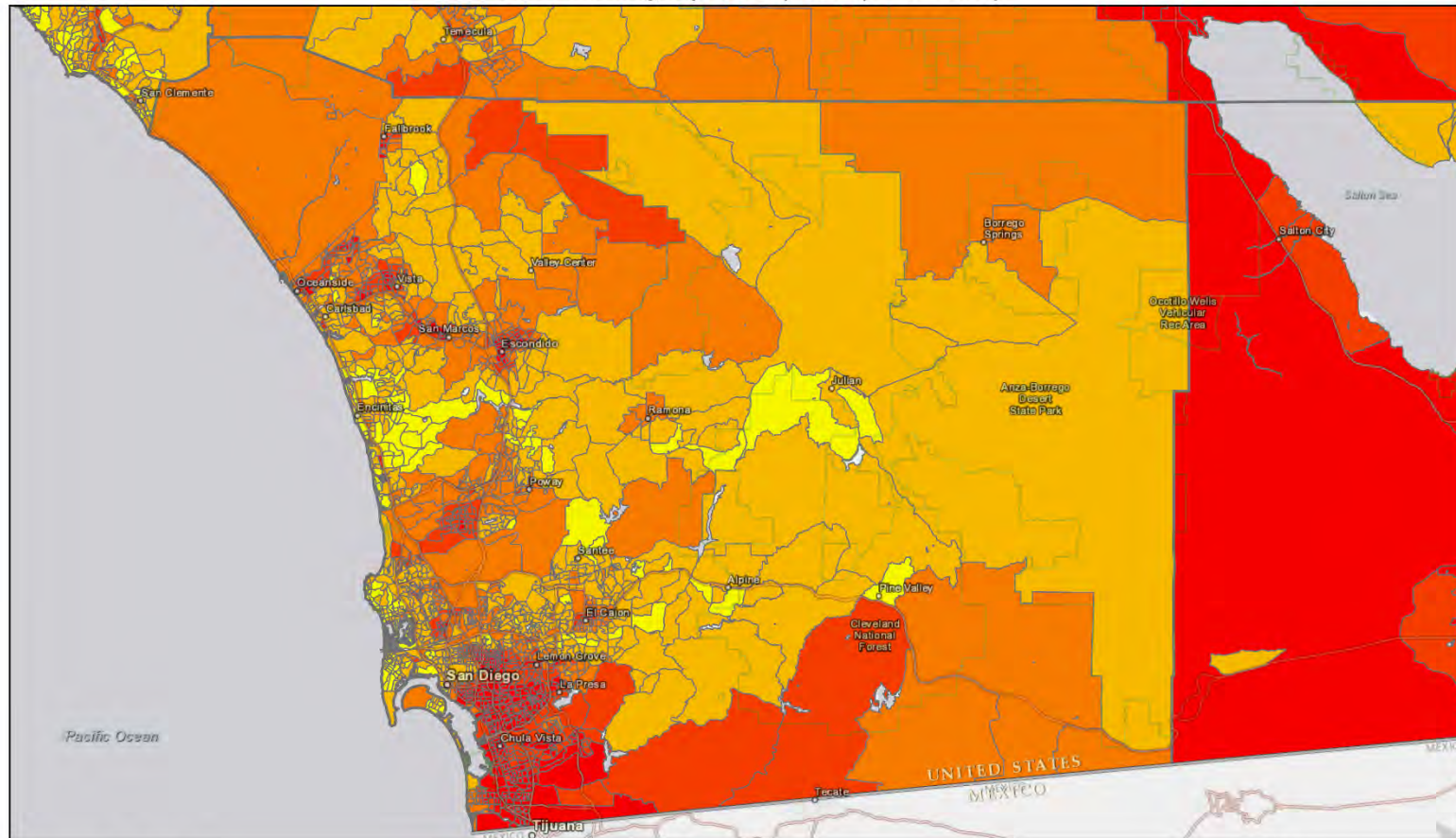
CA HCD

San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing

Source: HCD AFFH Data Viewer, Racial Demographics (2018) – Block Group, Esri Demographics Estimates, 2018.

Figure A- 4

Racial Demographics (2018) - County



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County Boundaries

(R) Racial Demographics (2018) - Block Group

≤ 20%

21 - 40%

41 - 60%

61 - 80%

> 81%

1:850,000

0 5 10 20 mi

0 5 10 20 km

Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, USGS, EPA, NPS

CA HCD

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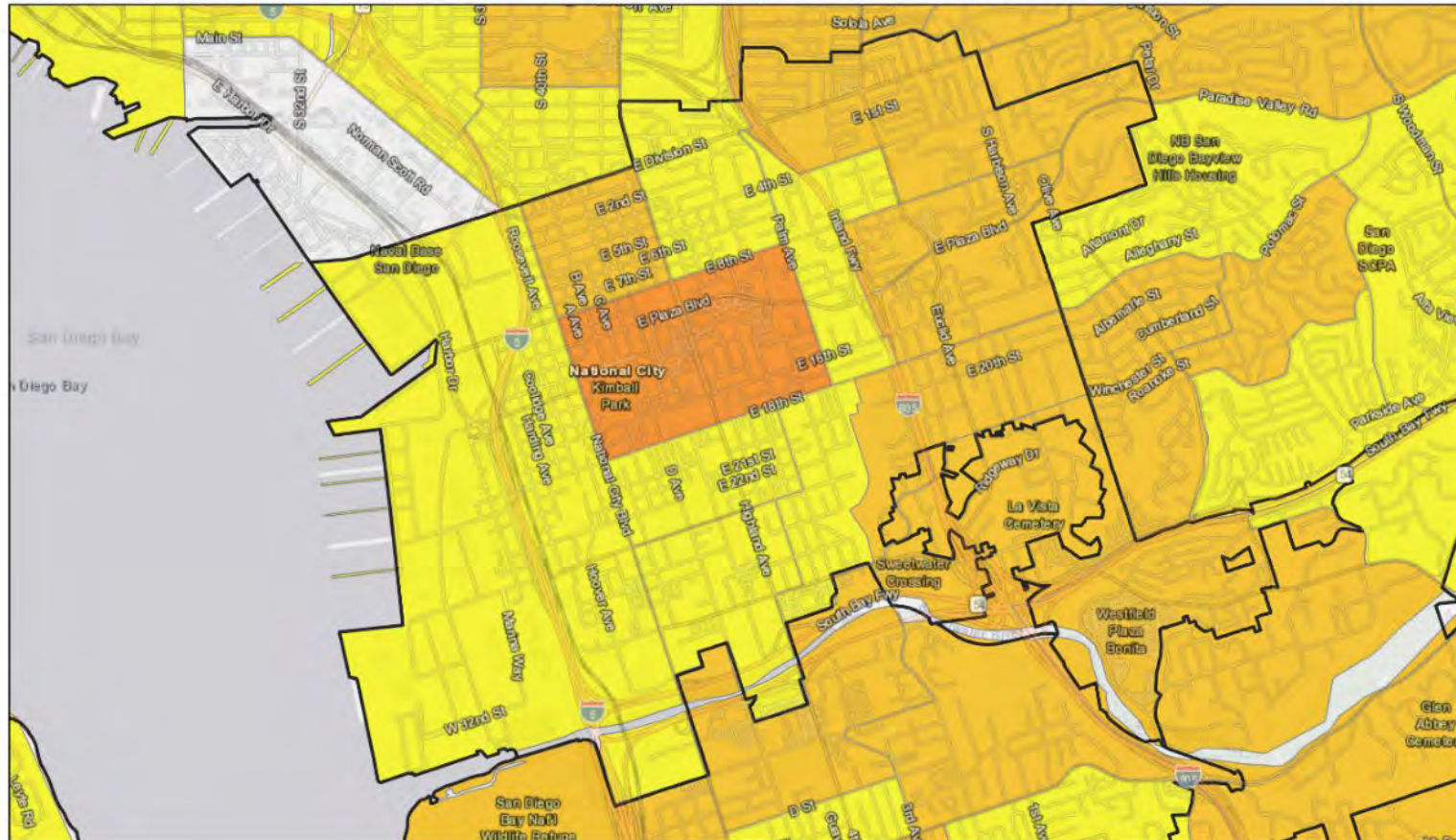
Source: HCD AFFH Data Viewer, Racial Demographics (2018) – Block Group, Esri Demographics Estimates, 2018.

Disability

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. In National City, 11.3% of the population has a disability. This percentage is higher than the countywide disability percentage of 9.8%. Figure A- 5 shows that census tracts with a higher percentage of disabled residents are concentrated in the eastern portion of the city, with one census tract in the central area of the city with the highest percentage of disabled residents. In this census tract (06073011700), 22.6% of the population has a disability. This high percentage of disabled residents may be due to the presence of several senior living facilities in this census tract, as seniors are often more likely to be disabled than younger individuals. Similarly, the census tracts to the east with higher percentages of disabled residents (10%-20%) also have senior living facilities in that area. As seen in Figure A- 6, many census tracts nearby National City also have higher percentages of disabled residents (10%-20%). Regionally, National City, Chula Vista, Imperial Beach, and San Diego have the highest percentages of disabled residents.

Figure A-5

Population with a Disability (ACS 2015-2019) - Tract



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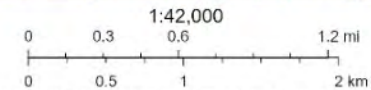
City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%



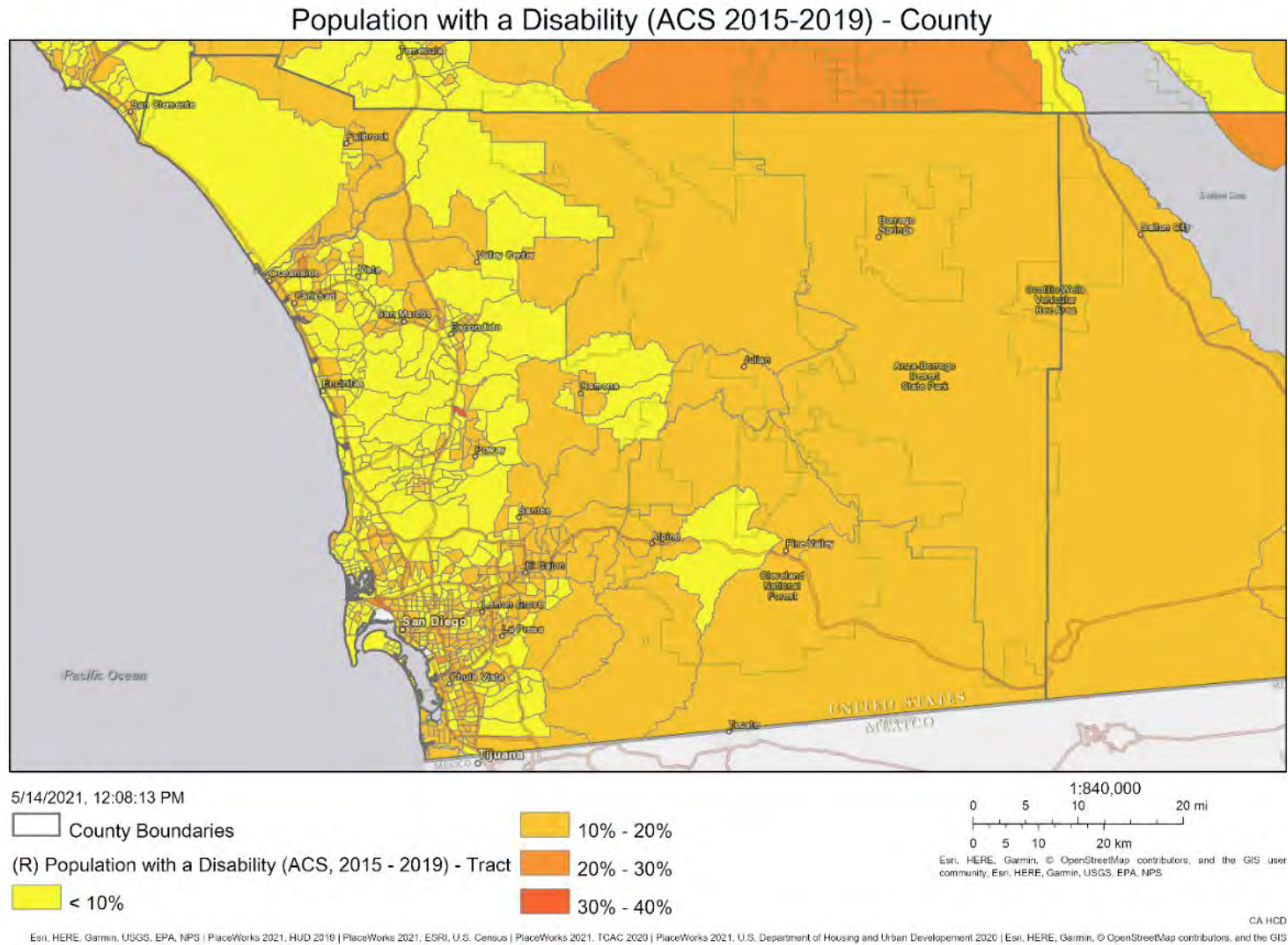
San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, OpenStreetMap contributors, and the GIS user community

CA HCD

PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | PlaceWorks 2021, ESRI 2021, FEMA 2020 | PlaceWorks 2021, Public Health Alliance of Southern California

Source: HCD AFFH Data Viewer, Population with a Disability – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 6



Source: HCD AFFH Data Viewer, Population with a Disability – Tract, ACS 5-Year Estimates 2015-2019.

Familial Status

Familial status refers to the relationships of people living together: for example, households with children under 18 years of age and the head of household marital status. As Figure A- 7 shows, there is no concentration of adults over the age of 18 living alone in National City. While there is one census tract in this map with a higher proportion of adults living alone in the central area of the city, the percentage in this tract is 20.1%, which is only 0.1% above the threshold for its legend group; this difference is negligible. Regionally, there is a slight concentration of adults living alone in central San Diego and Pacific Beach, as shown in Figure A- 8. The distribution of adults living with their spouses in National City is shown in Figure A- 9. Similarly, there is only one census tract in National City with a higher proportion of adults living with their spouse, and this percentage is 40.8%, which is only 0.8% above the threshold for its legend group. It can thus be concluded that there is also no concentration of adults living with their spouse in National City. This trend is consistent with the immediate region; as seen in Figure A- 10, areas to the north and south of National City tend to have many adults not living with a spouse, while areas to the east and in the northern portion of the county tend to have more adults living with a spouse.

Single parent households, in particular female-headed families, often require special assistance such as accessible day care, health care, and other supportive services. Of the total households in National City, approximately 5,443 identify as having a female householder, with no spouse or partner present (32.7%). This figure is higher than the countywide figure of 25.3%. Because of their low income and higher family expenses, many single parent households live in poverty. Figure A- 11 shows the distribution of children living in single female-headed households and reveals a concentration in the western portion of the city. These census tracts also have a lower median income than tracts to the east, as well as a higher percentage of people living in poverty. Conversely, Figure A- 13 shows that there is a concentration of children living in married couple households in the eastern portion of the city. These tracts also have higher median incomes and lower percentages of people living in poverty. However, because the household median income in National City is low, these census tracts still have a relatively high percentage of low- to moderate-income households (mostly 50%-75%, with some 25%-50%). National City has a higher percentage of children living in female-headed households than the county (7.6% and 4.6%, respectively) and a lower percentage of children living in married-couple households than the county (18.7% and 21.7%, respectively).¹

¹ ACS, Table DP02: Selected Social Characteristics in the United States 5-Year Estimates 2015-2019.

Figure A-7

Percent of Population 18 Years and Over in Households Living Alone (ACS 2015-2019) - Tract



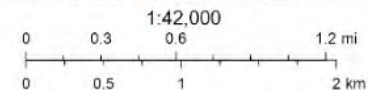
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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

< 20%

20% - 40%



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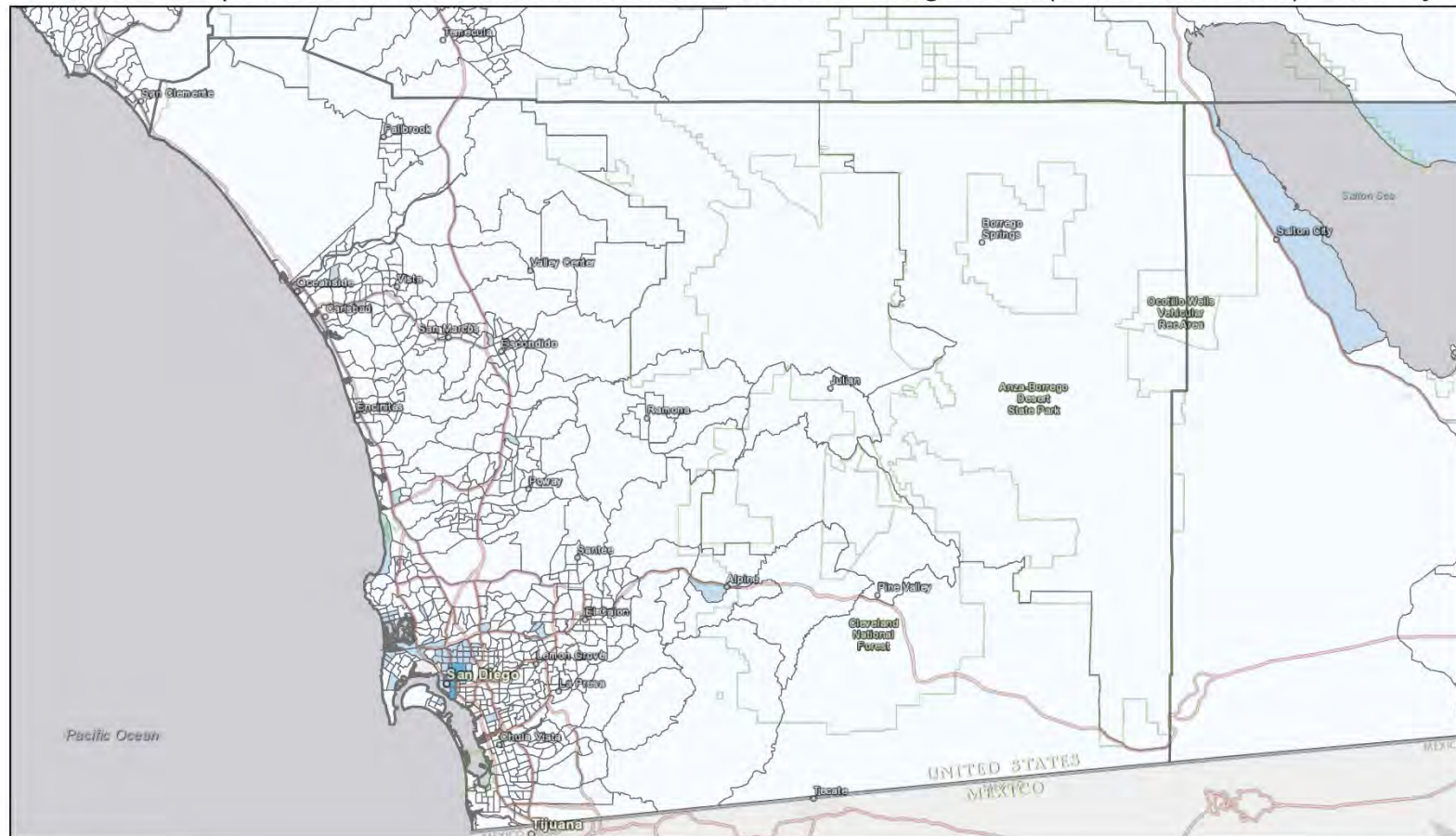
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Source: HCD AFFH Data Viewer, Percent of Population 18 Years and Over in Households Living Alone – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 8

Percent of Population 18 Years and Over in Households Living Alone (ACS 2015-2019) - County



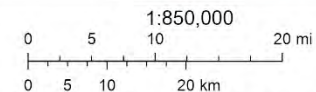
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County Boundaries

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

< 20%

20% - 40%



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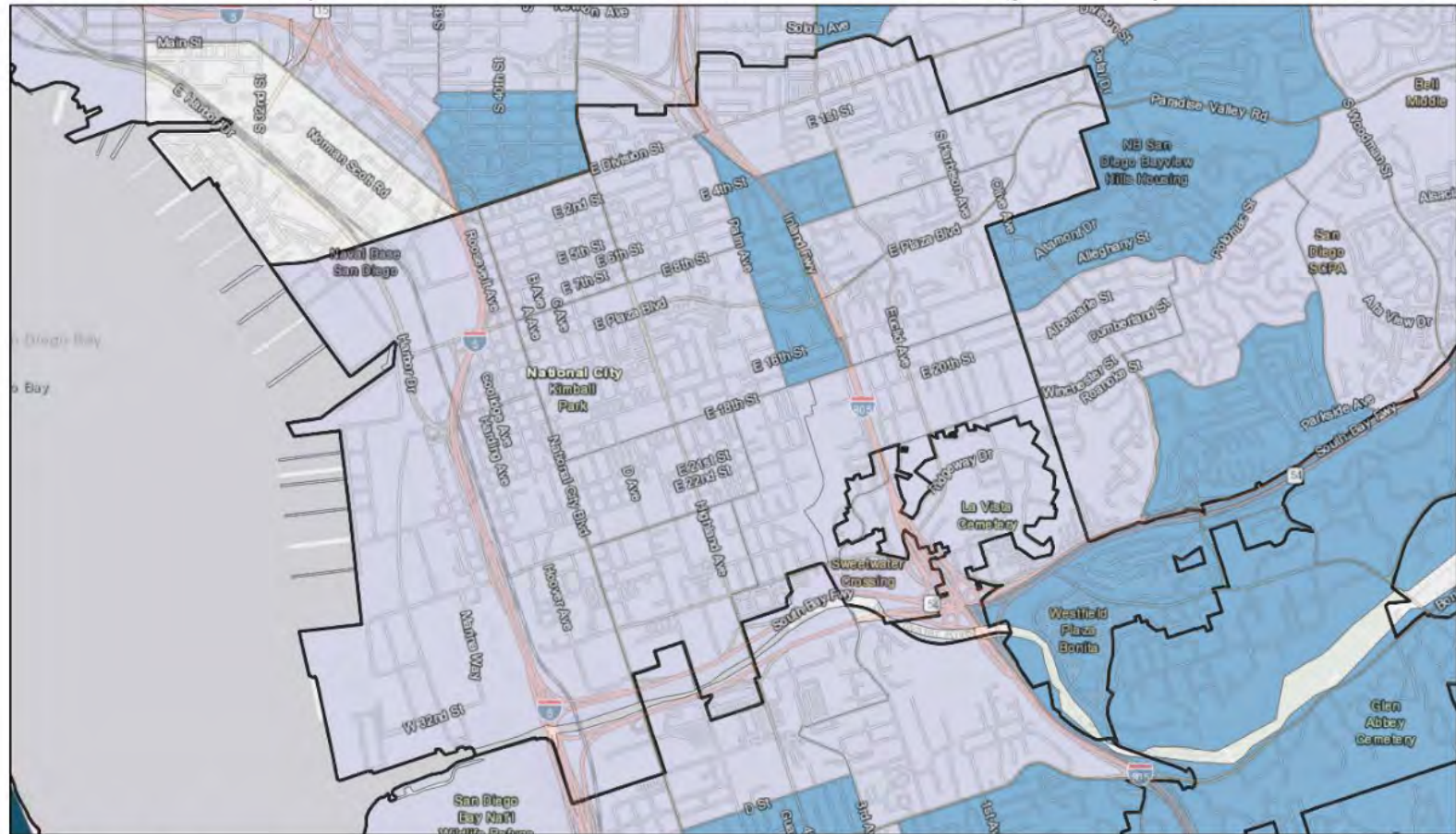
CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Percent of Population 18 Years and Over in Households Living Alone – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 9

Percent of Population 18 Years and Over in Households Living with a Spouse - Tract



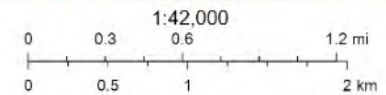
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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%



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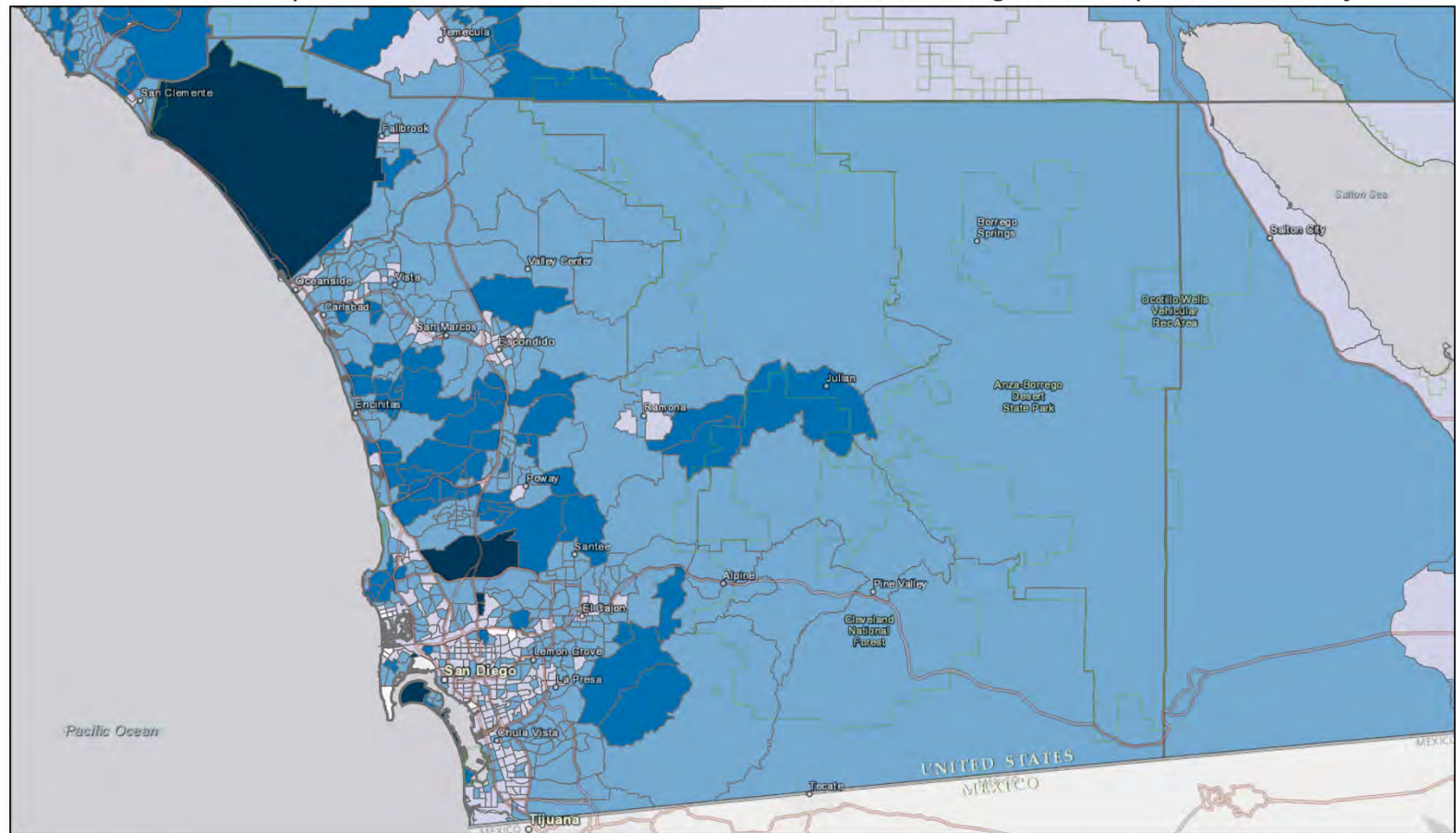
CA HCD

San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing

Source: HCD AFFH Data Viewer, Percent of Population 18 Years and Over in Households Living with a Spouse – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 10

Percent of Population 18 Years and Over in Households Living with a Spouse - County



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County Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%

> 80%

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0 5 10 20 mi
0 5 10 20 km

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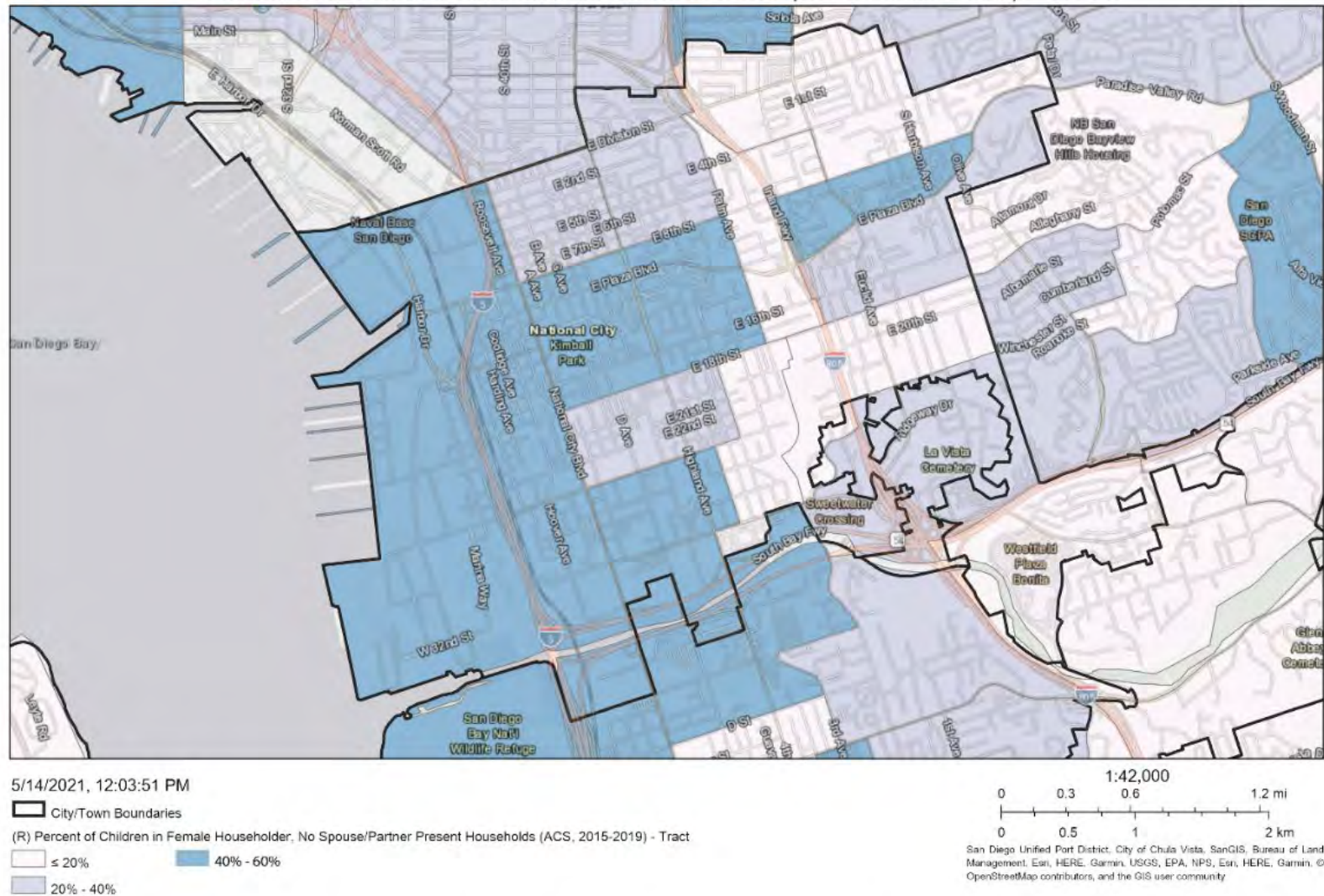
CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Percent of Population 18 Years and Over in Households Living with a Spouse – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 11

Percent of Children in Female Householder (ACS 2015-2019) - Tract

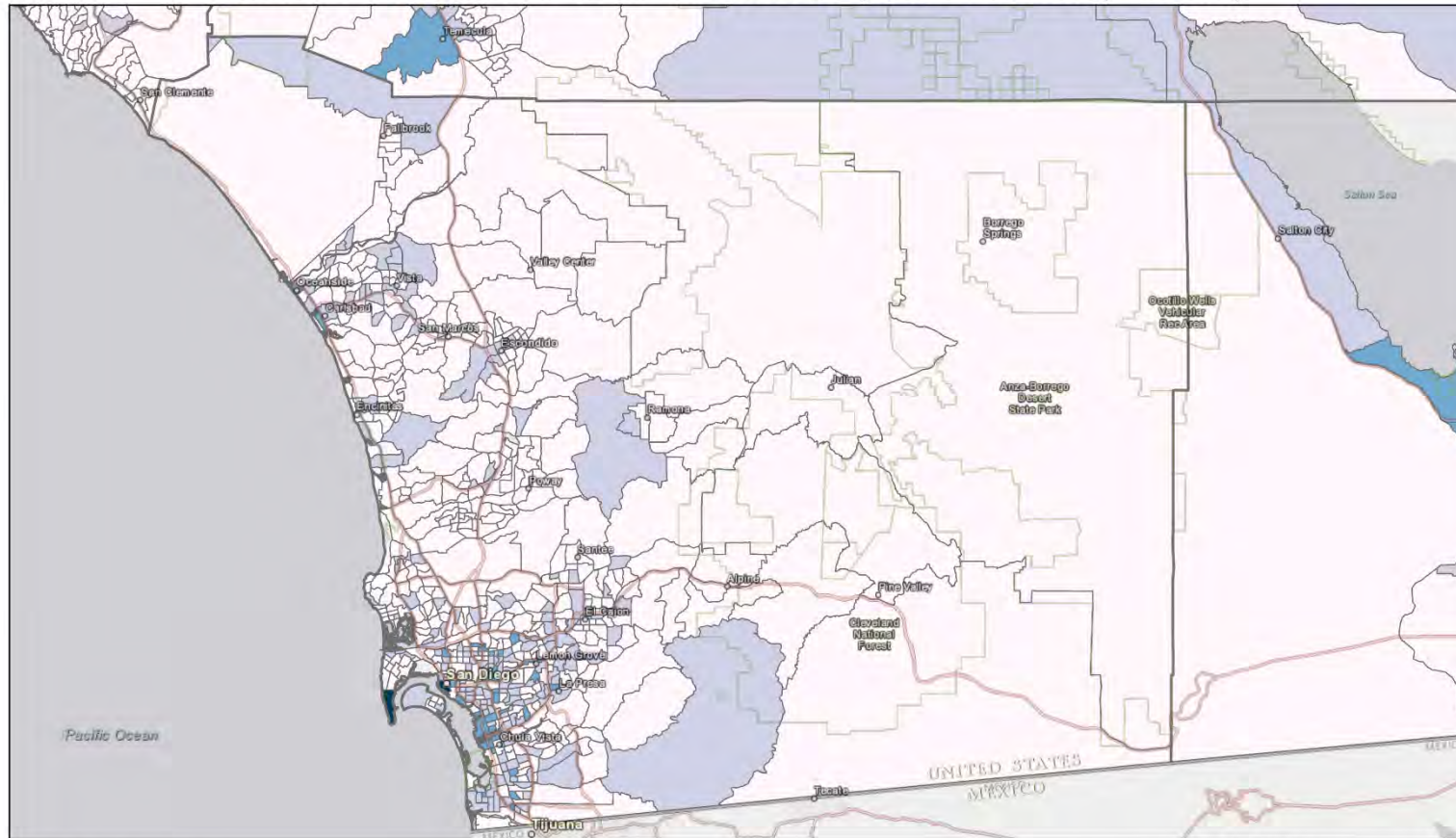


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San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, Esri, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing

Source: HCD AFFH Data Viewer, Percent of Children in Female Householder, No Spouse/Partner Present Households – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 12

Percent of Children in Female Householder (ACS 2015-2019) - County



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County Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

≤ 20% 40% - 60% > 80%
 20% - 40% 60% - 80%

1:850,000
 0 5 10 20 mi
 0 5 10 20 km

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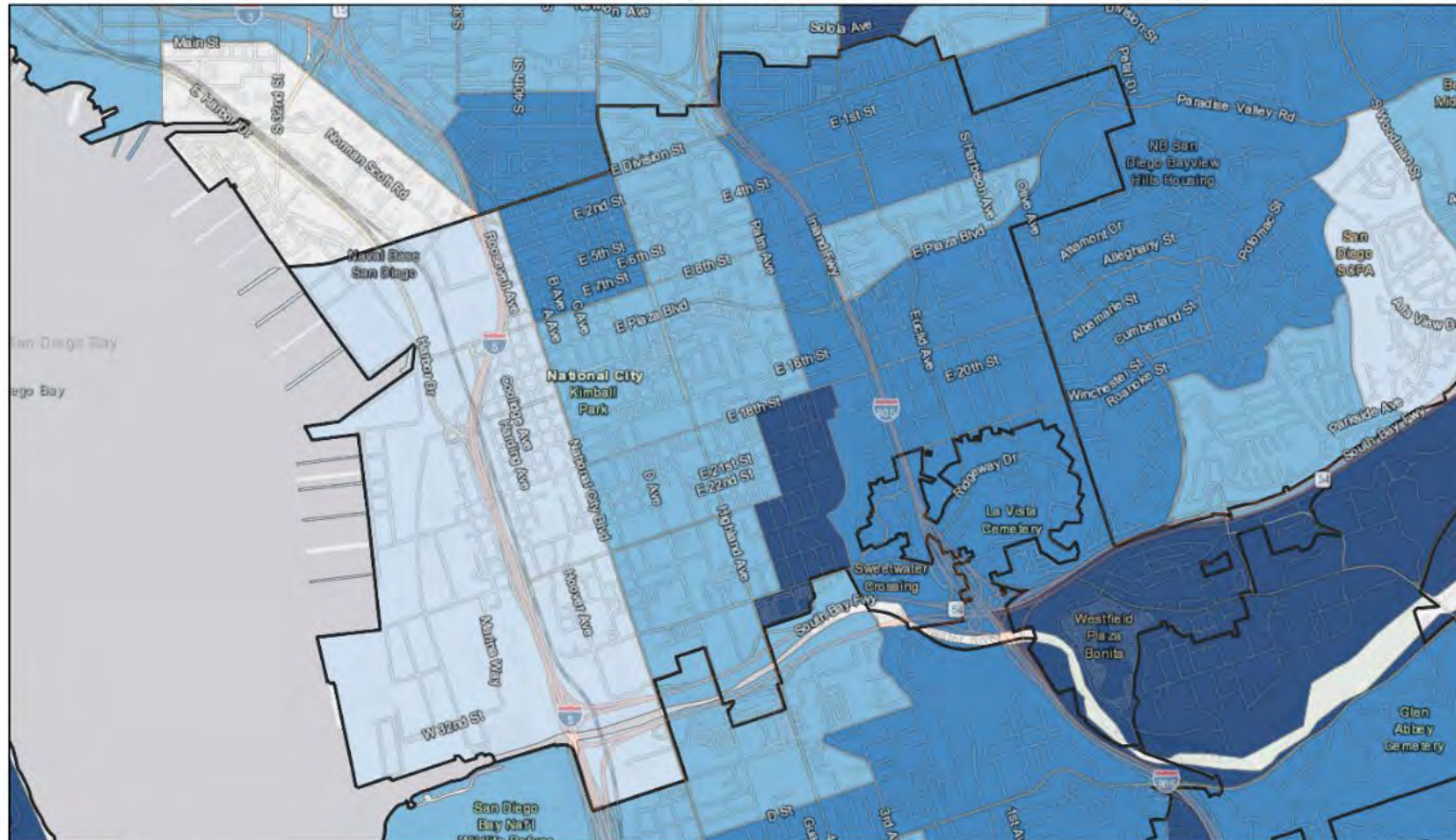
CA HCD

Eri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Eri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Percent of Children in Female Householder, No Spouse/Partner Present Households – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 13

Percent of Children in Married Couple Households (ACS 2015-2019) - Tract



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City/Town Boundaries

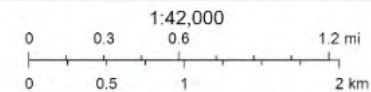
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%

60% - 80%

> 80%



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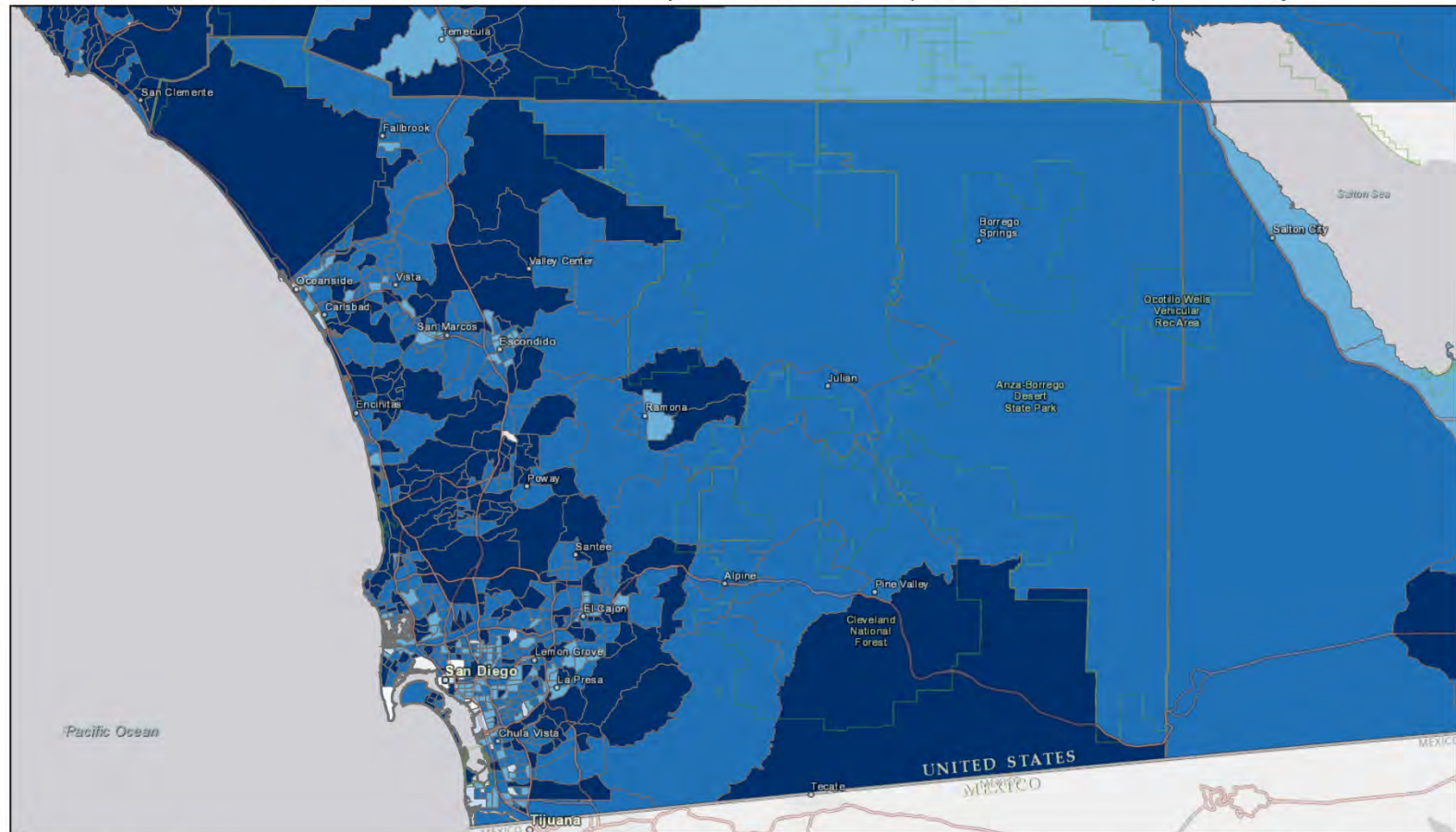
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San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing

Source: HCD AFFH Data Viewer, Percent of Children in Married-Couple Households – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 14

Percent of Children in Married Couple Households (ACS 2015-2019) - County



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County Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%

> 80%

1:850,000
0 5 10 20 mi
0 5 10 20 km

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CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Percent of Children in Married-Couple Households – Tract, ACS 5-Year Estimates 2015-2019.

Income

The median household income for National City is \$47,119,² whereas the regional area median income is \$66,529.³ Approximately 13% of households are extremely low-income (30% AMI). National City has the highest percentage of very low-income and second highest percentage of low-income households in the county.⁴ The citywide distribution of median household income is shown in Figure A- 15 and the distribution of low- to moderate-income households (those with an Area Median Income of 80% or less) is shown in Figure A- 17. Figure A- 19 shows the spatial distribution of the percentage households within National City living below the poverty line, and Figure A- 20 shows the distribution within the region. Though National City as a whole has disproportionately low incomes when compared to the region, within the city, households with particularly low incomes are concentrated in the western census tracts. Regionally, incomes tend to be lower in the southern portion of the county closer to the US/Mexico border, including Chula Vista, Imperial Beach, and central and southern San Diego.

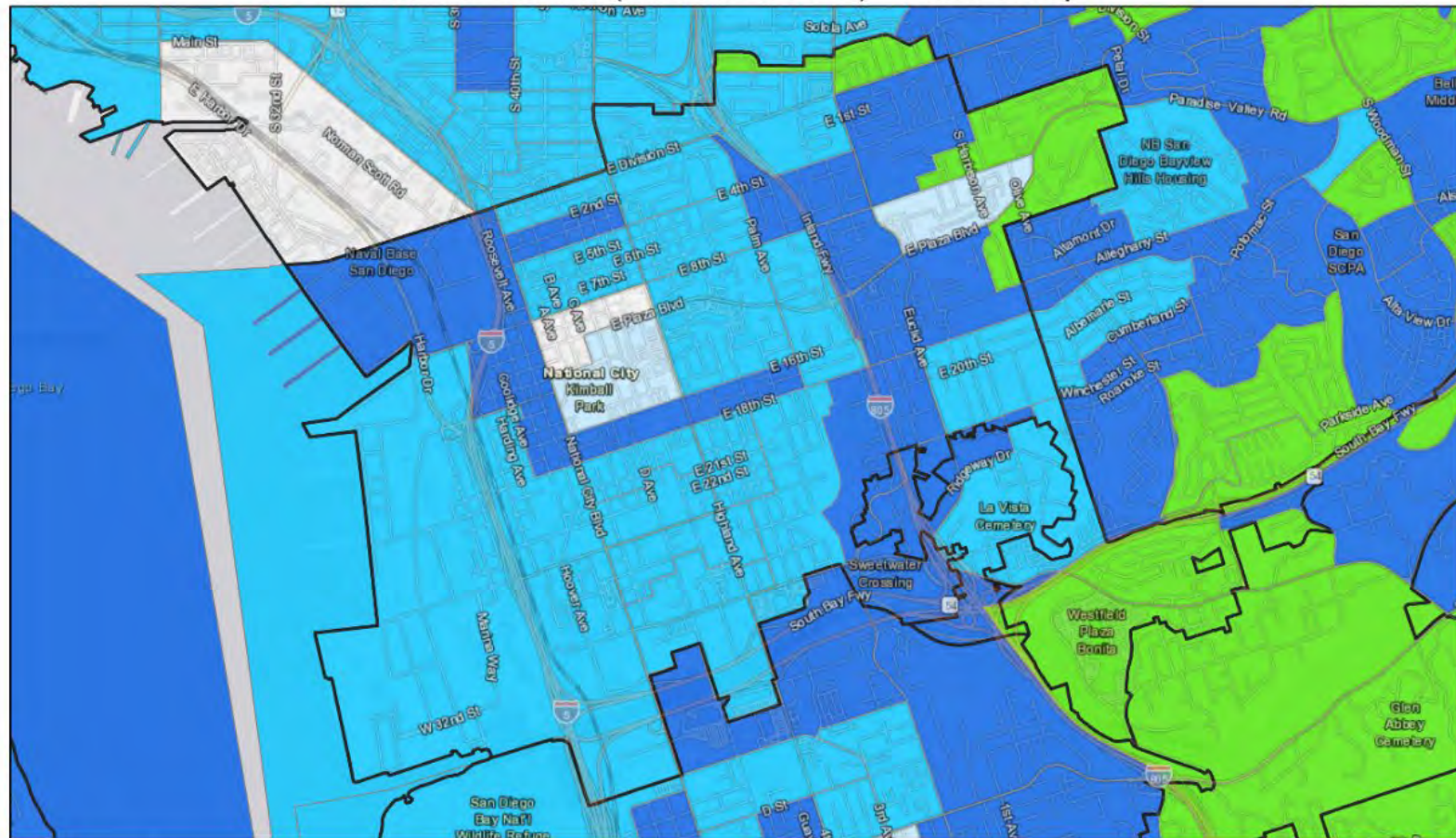
² ACS, Table DPO3: Selected Economic Characteristics 5-Year Estimates 2015-2019.

³ SANDAG 6th Cycle Regional Housing Needs Assessment Plan. July 10, 2020.

⁴ SANDAG, Final 6th Cycle Regional Housing Needs Assessment Methodology. July 2020.

Figure A- 15

Median Income (ACS 2015-2019) - Block Group



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City/Town Boundaries

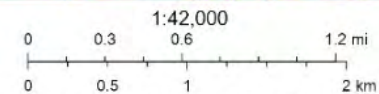
(R) Median Income (ACS, 2015-2019) - Block Group

< \$30,000

< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000



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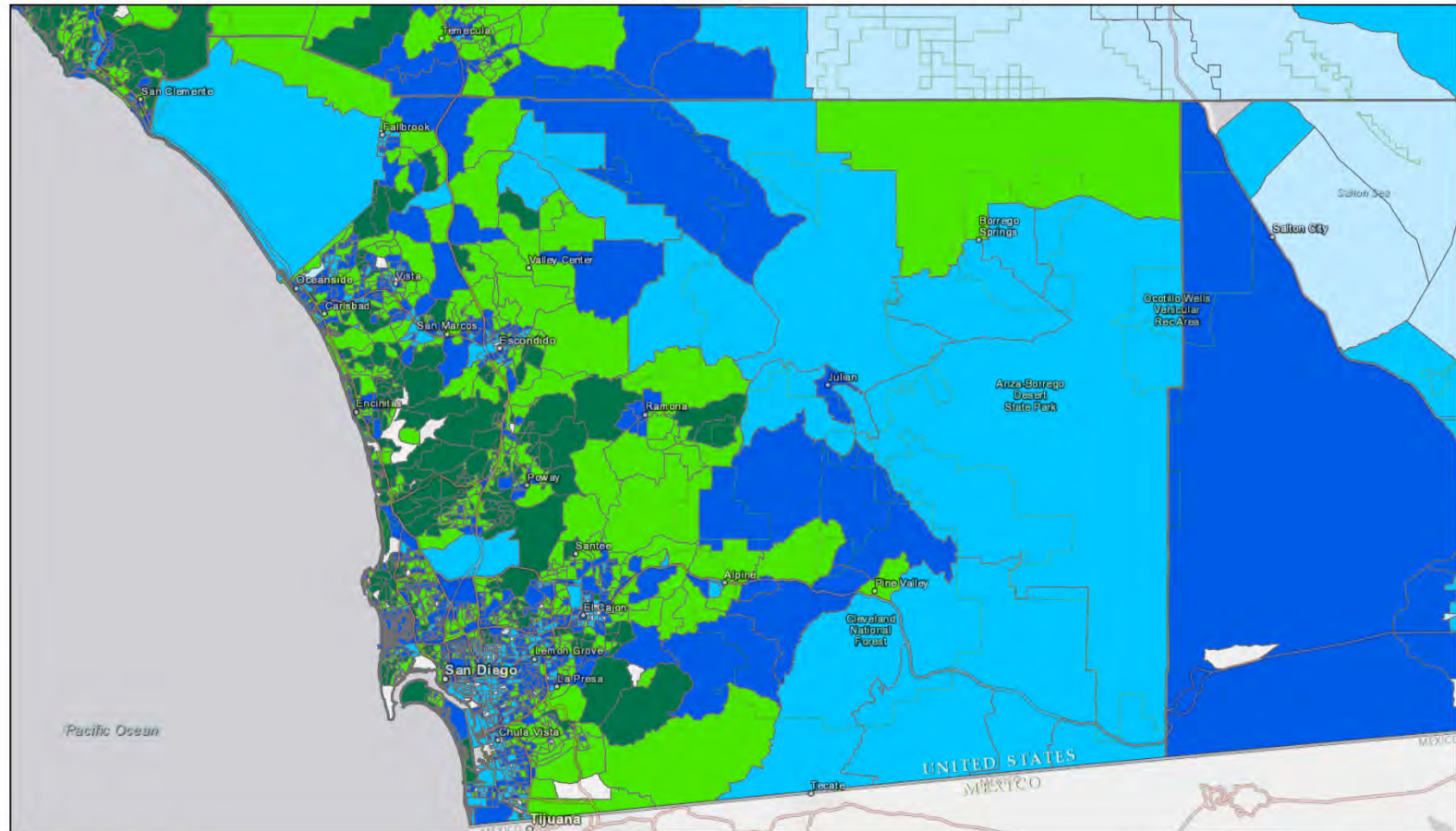
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Source: HCD AFFH Data Viewer, Median Income – Block Group, ACS 5-Year Estimates 2015-2019.

Figure A- 16

Median Income (ACS 2015-2019) - County



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County Boundaries

(R) Median Income (ACS, 2015-2019) - Block Group

< \$30,000

< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000

Greater than \$125,000

1:850,000
0 5 10 20 mi
0 5 10 20 km

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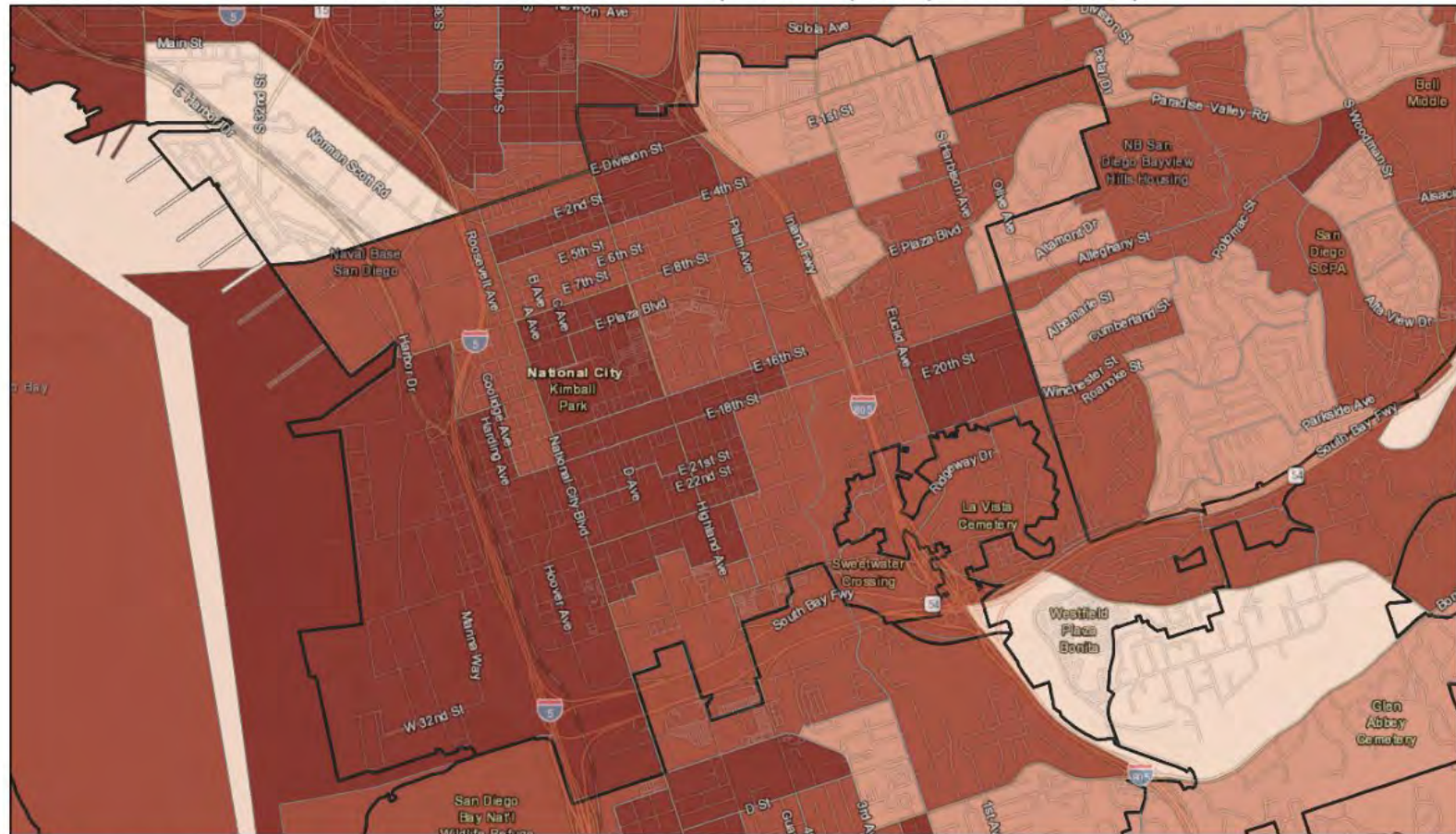
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Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Median Income – Block Group, ACS 5-Year Estimates 2015-2019.

Figure A- 17

Low to Moderate Income Population (HUD) - Block Group



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City/Town Boundaries

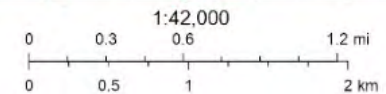
(A) Low to Moderate Income Population (HUD) - Block Group

< 25%

25% - 50%

50% - 75%

75% - 100%



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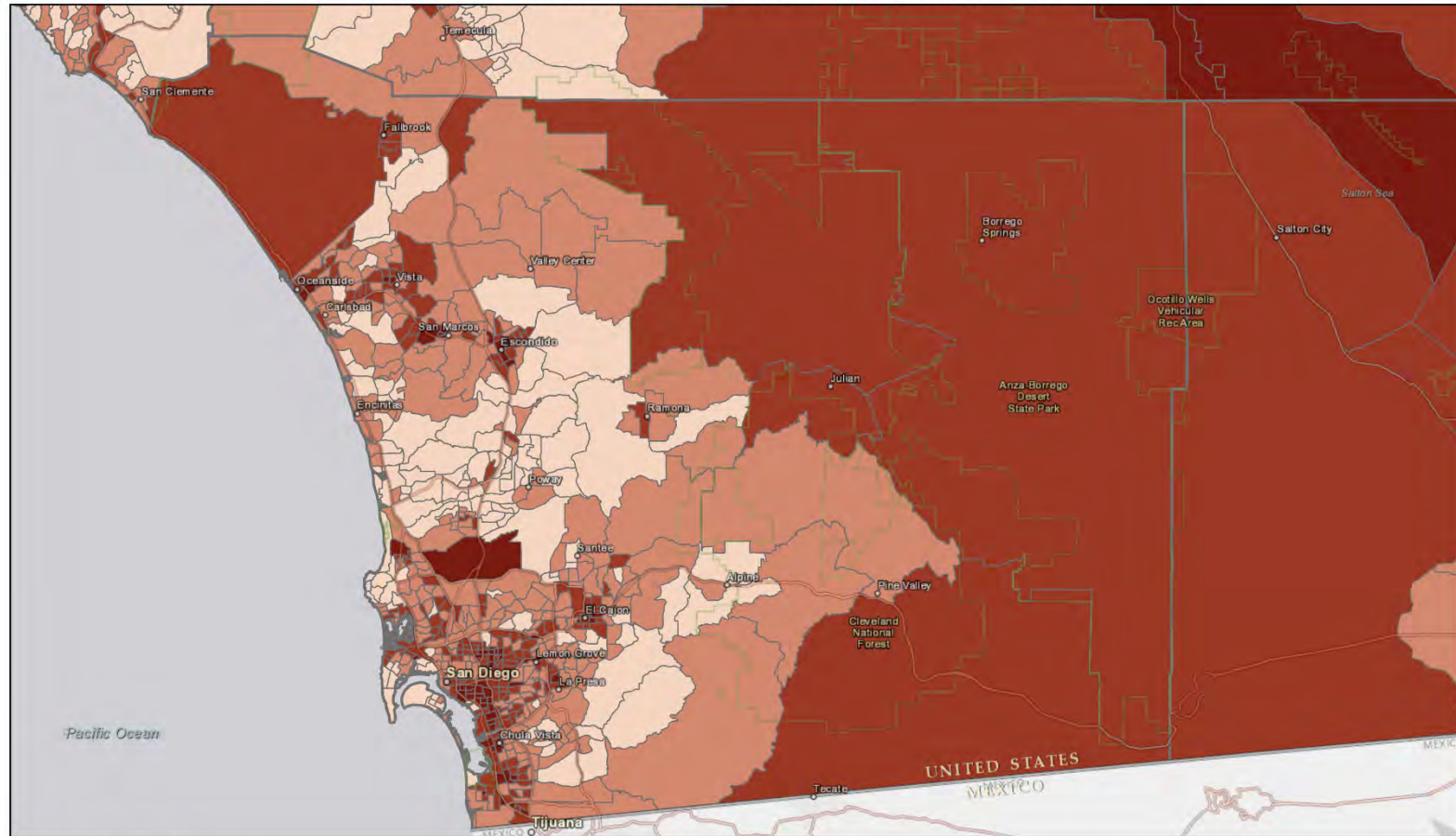
CA HCD

San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing

Source: HCD AFFH Data Viewer, Low to Moderate Income Population – Tract, HUD, ACS 5-Year Estimates 2011-2015.

Figure A- 18

Low to Moderate Income Population (HUD) - County



6/28/2021, 2:23:59 PM

County Boundaries

(A) Low to Moderate Income Population (HUD) - Tract

< 25%

25% - 50%

50% - 75%

75% - 100%

1:850,000
0 5 10 20 mi
0 5 10 20 km

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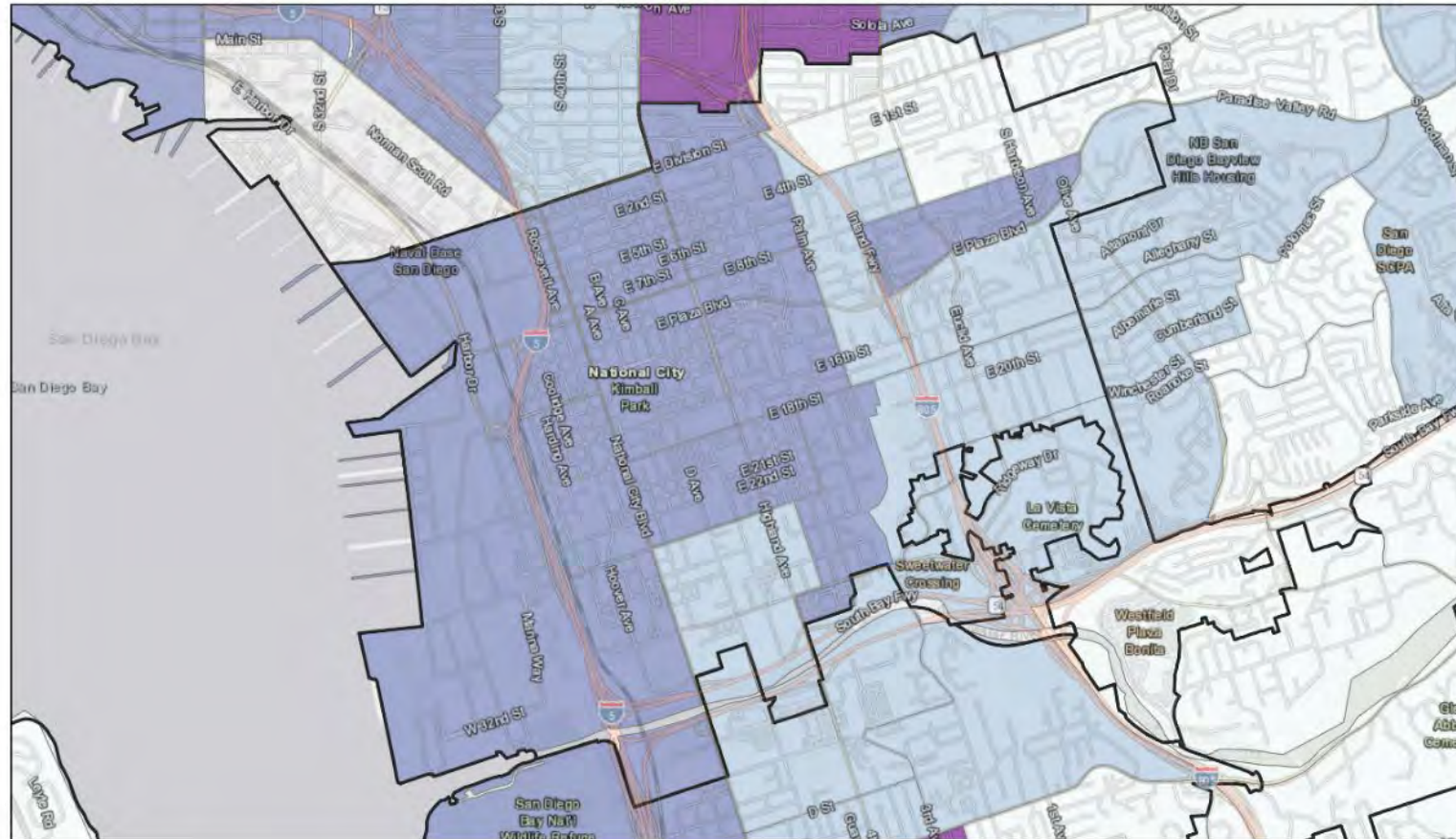
CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Low to Moderate Income Population – Tract, HUD, ACS 5-Year Estimates 2011-2015.

Figure A- 19

Poverty Status (ACS 2015-2019) - Tract



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City/Town Boundaries

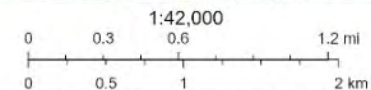
(R) Poverty Status (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

30% - 40%



San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, OpenStreetMap contributors, and the GIS user community

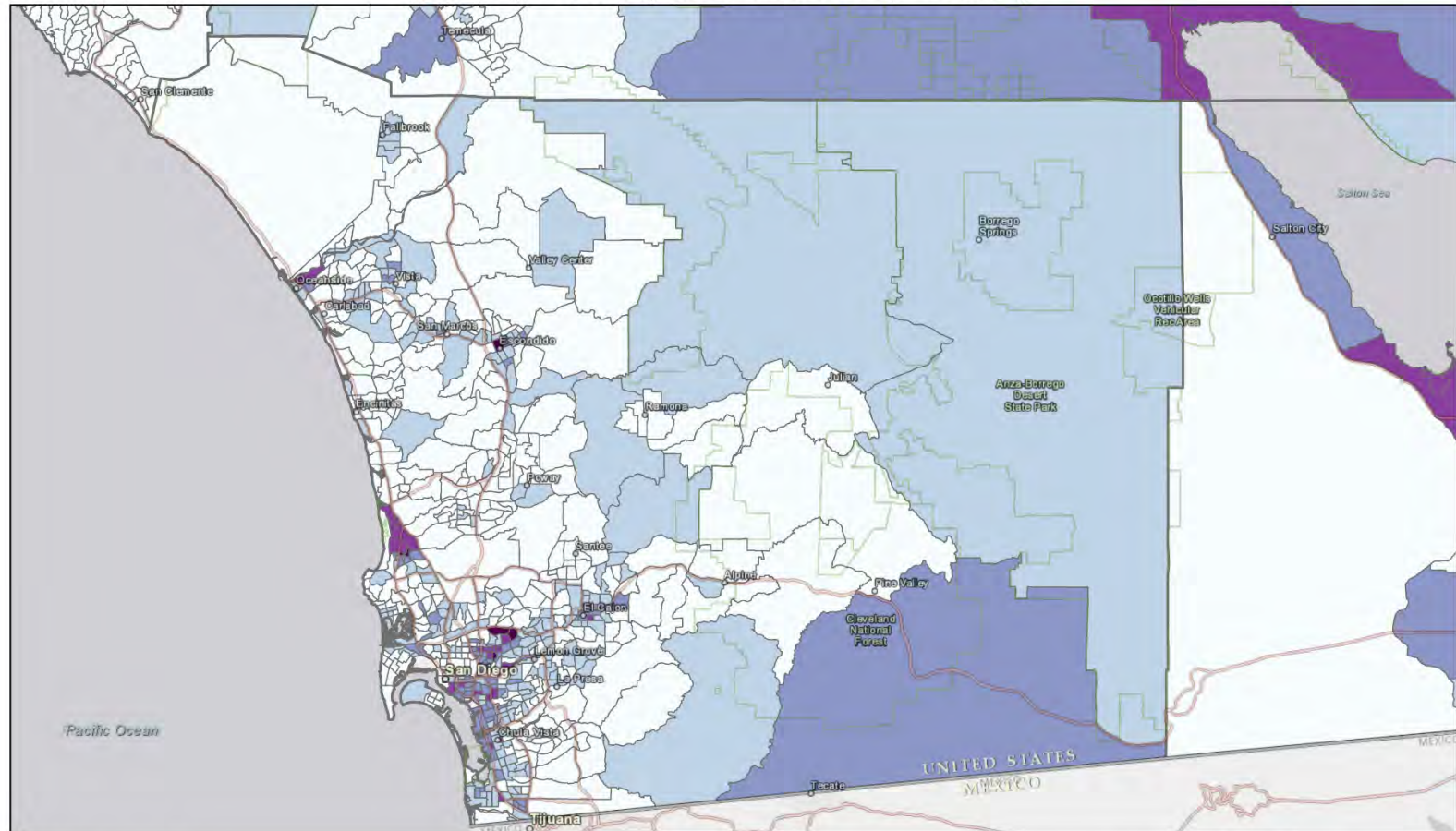
CA HCD

PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | PlaceWorks 2021, ESRI 2021, FEMA 2020 | PlaceWorks 2021, Public Health Alliance of Southern California

Source: HCD AFFH Data Viewer, Poverty Status – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 20

Poverty Status (ACS 2015-2019) - County



6/28/2021, 2:25:39 PM

County Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

30% - 40%

> 40%

1:850,000
0 5 10 20 mi
0 5 10 20 km

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CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS

Source: HCD AFFH Data Viewer, Poverty Status – Tract, ACS 5-Year Estimates 2015-2019.

Racially or Ethnically Concentrated Areas

Racially or Ethnically Concentrated Areas of Poverty

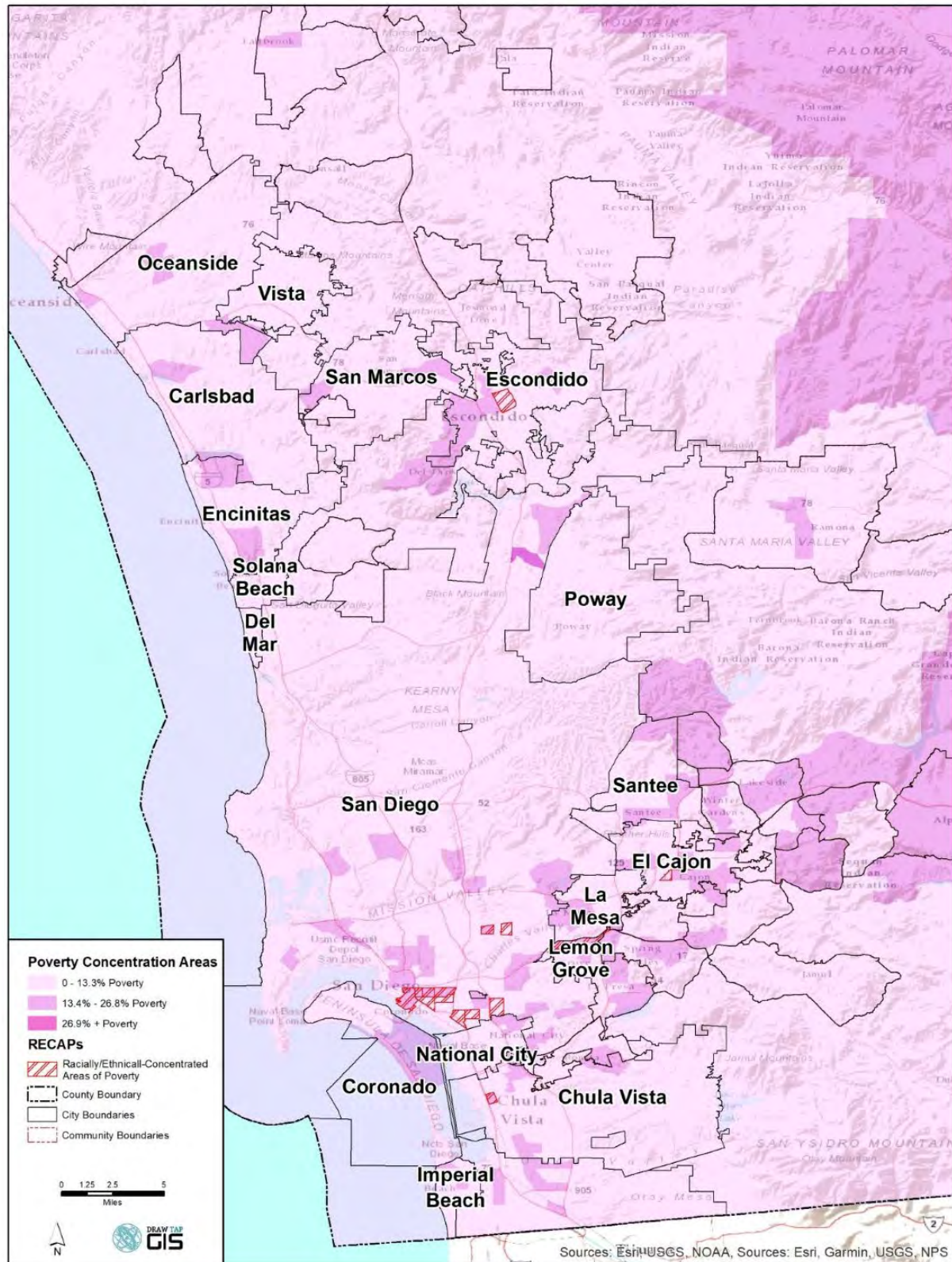
Because poverty is often closely correlated with race and ethnicity, examining poverty in relation to these variables is key to understanding the economic makeup of a city. Examining the spatial distribution of poverty along racial and ethnic lines enables cities to understand if there are racially or ethnically concentrated areas of poverty. The US Department of Housing and Urban Development (HUD) prepares maps of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) throughout the country. In order 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.”⁵ HUD does not identify any areas of National City as R/ECAPs, though one census tract bordering National City in the City of San Diego is a R/ECAP, as shown in Figure A- 21. Table A- 2 provides local and regional context for the median household incomes of nonwhite residents.

Table A- 2: Median Household Income by Race/Ethnicity

Race/Ethnicity	National City		San Diego County	
	Median Income	Population	Median Income	Population
Black or African American	\$41,089	5.3%	\$55,842	5.0%
American Indian and Alaska Native	\$31,146	0.5%	\$56,682	0.7%
Asian	\$55,817	19.8%	\$96,856	12.8%
Native Hawaiian and Other Pacific Islander	\$53,173	0.5%	\$69,591	0.4%
Hispanic or Latino origin (of any race)	\$43,765	57.6%	\$59,850	32.6%
Other	\$51,052	2.8%	\$70,083	3.4%
All Households	\$69,901		\$46,558	
Note: This data is aggregated by race and ethnicity. Source: ACS, Table S1903 MEDIAN INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) 5-Year Estimate 2015-2019 SANDAG Demographic and Socioeconomic Estimates, 2019.				

⁵ US Department of Housing and Urban Development. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). 2020. https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_0?geometry=-117.492%2C-32.556%2C-116.624%2C-32.758

Figure A- 21: Western San Diego County R/ECAPs



Source: 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice, HUD, ACS 5-Year Estimates 2013-2017.

Racially or Ethnically Concentrated Areas of Affluence

To further assess the correlation of concentration of incomes and race/ethnicity, it is helpful to examine racially or ethnically concentrated areas of affluence. To identify these areas, this analysis examines census tracts with a population that is at least 50% white and a median income over \$125,000. National City does not have any census tracts in which residents have a median income of over \$125,000, nor does it have any census tracts which are greater than 50% white; thus, while the city does have concentrations of race and ethnicity, it does not have racially concentrated areas of affluence. Table A- 3 shows local and regional context for the median household incomes of white residents.

Table A- 3: Median Household Income by Race - White

	National City		San Diego County	
Race	Median Income	Population	Median Income	Population
White	\$45,374	13.5%	\$80,225	45.1%
All Households	\$69,901		\$46,558	
Source: ACS, Table S1903 MEDIAN INCOME IN THE PAST 12 MONTHS (IN 2019 INFLATION-ADJUSTED DOLLARS) 5-Year Estimate 2015-2019 SANDAG Demographic and Socioeconomic Estimates, 2019.				

Access to Opportunities

A key goal of this Housing Element is to facilitate improved access to opportunity for all National City 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 TCAC Opportunity Map aggregates a variety of indicators that measure economic mobility, environmental factors, and educational attainment domains. The TCAC/HCD Opportunity Map provides a high-level assessment of resources available in an area and categorize census tracts as Low Resource, Moderate Resource, or High Resource. Figure A- 22 illustrates the TCAC/HCD Opportunity Map for National City and Table A- 4 shows the domain scores for each of National City's census tracts. Table A- 5 summarizes the percentage of the city's planning area within each of the opportunity categories. As shown in Figure A- 22 and summarized in Table A- 5, the majority of National City falls within Low Resource (39.8%) followed by Moderate Resource (17.1%). It should be noted that the area for which there is insufficient data (census tract 06073021900; 43.1%) corresponds to areas primarily characterized by industrial and military uses.

Table A- 4: National City Census Tracts by TCAC Opportunity Domain

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
06073003204	0.419	0.402	0.453	-0.119	Moderate Resource
06073003207	0.614	0.494	0.479	0.05	Moderate Resource
06073003212	0.441	0.6	0.547	0.009	Moderate Resource
06073011601	0.104	0.12	0.28	-0.602	Low Resource
06073011602	0.142	0.104	0.326	-0.533	Low Resource
06073011700	0.215	0.096	0.147	-0.601	Low Resource
06073011801	0.178	0.135	0.104	-0.633	Low Resource
06073011802	0.097	0.176	0.137	-0.65	Low Resource
06073011902	0.405	0.509	0.205	-0.304	Moderate Resource
06073012002	0.123	0.663	0.263	-0.446	Low Resource
06073012003	0.371	0.612	0.354	-0.221	Moderate Resource
06073012101	0.231	0.255	0.193	-0.484	Low Resource
06073012102	0.118	0.455	0.296	-0.467	Low Resource
06073021600	0.677	0.145	0.627	0.14	High Resource
06073021900	N/A	N/A	N/A	N/A	N/A
06073012200	0.274	0.405	0.297	-0.363	Low Resource
06073022000	0.156	0.231	0.191	-0.538	Low Resource

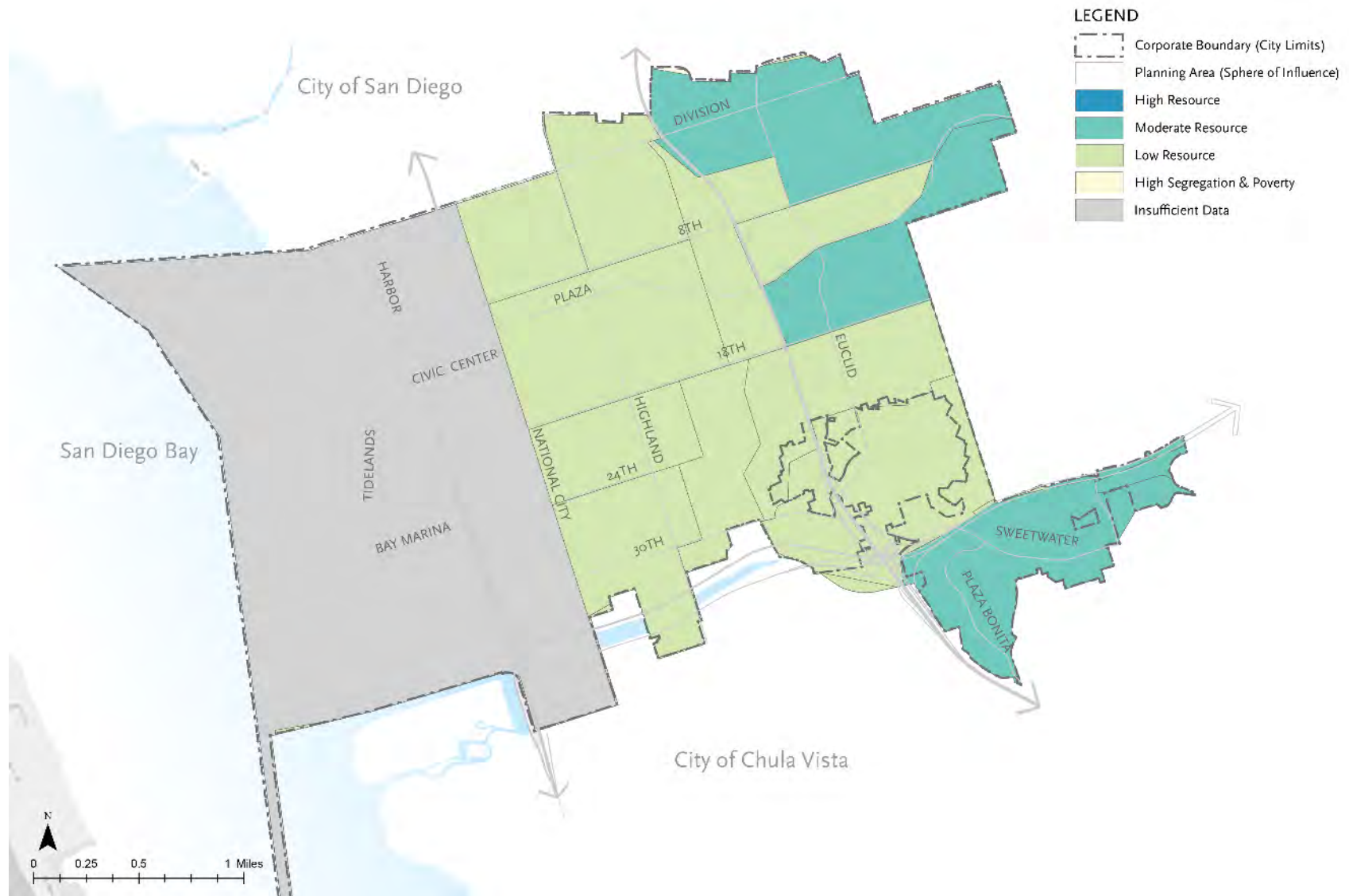
Source: California Fair Housing Task Force, TCAC/HCD Opportunity Maps, 2020 Statewide Summary Table, December 2020

Table A- 5: Percentage of Planning Area by TCAC/HCD Opportunity Category

Opportunity Category	Percentage of National City Planning Area
Highest Resource	0.0%
High Resource	0.0%
Moderate Resource (Rapidly Changing)	0.0%
Moderate Resource	17.1%
Low Resource	39.8%
High Segregation and Poverty	0.0%
Insufficient Data	43.1%

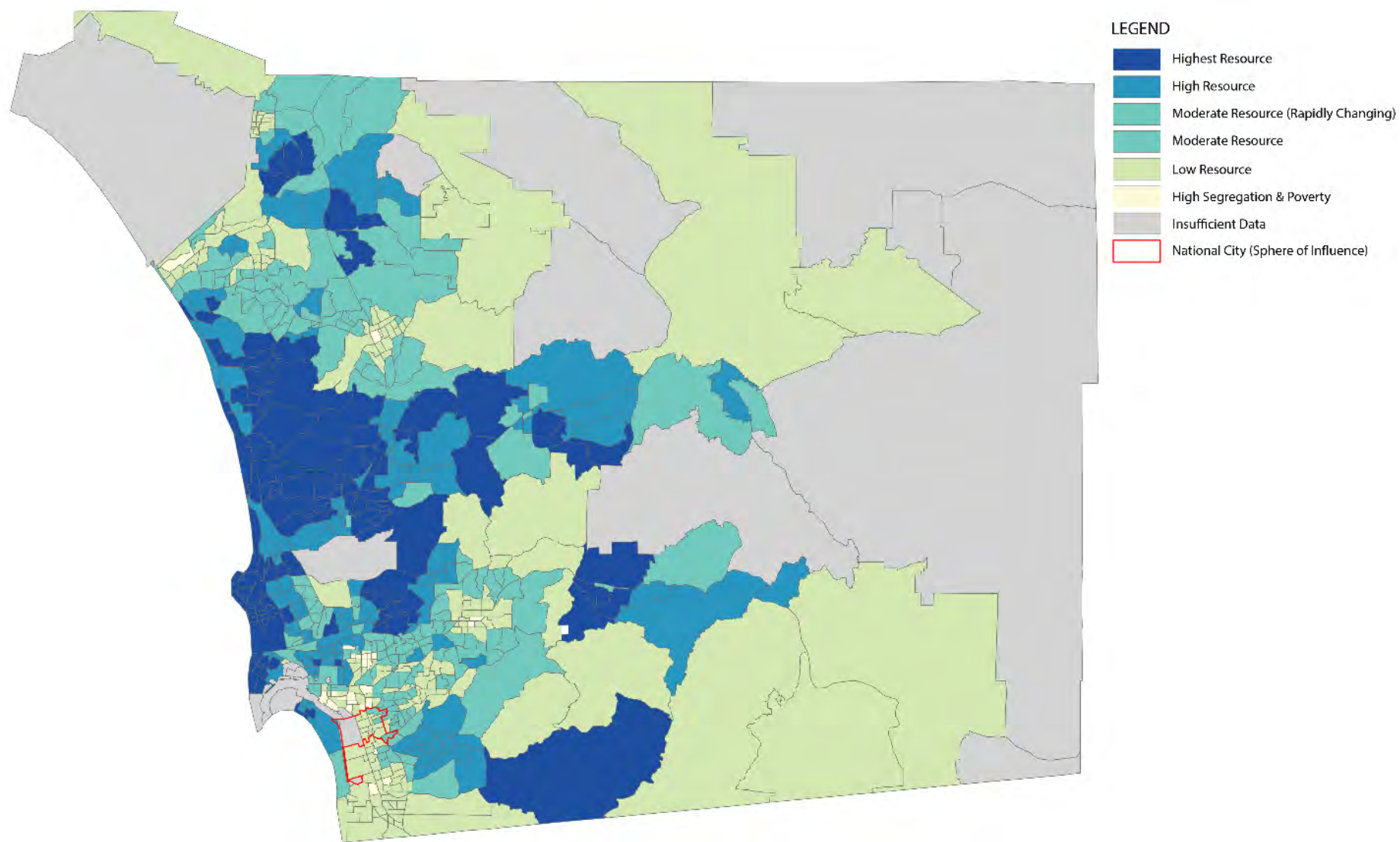
Source: TCAC/HCD 2021 Opportunity zone map. Retrieved from: <https://www.treasurer.ca.gov/ctcac/opportunity.asp>

Figure A- 22: TCAC/HCD Opportunity Zone Map for National City



Source: California Tax Credit Allocation Committee, 2021.

Figure A- 23: TCAC/HCD Opportunity Zone Map for San Diego County



Source: California Tax Credit Allocation Committee, 2021.

Employment

Naval Base San Diego is a regionally significant military installation that is located within National City. Approximately 7,446 of National City residents are employed as a part of the armed forces.⁶ The City's 2020 Homefront to Waterfront study analyzes various transportation opportunities, such as micro-mobility, neighborhood electric vehicle (NEV) shuttles, and mobility hubs, to better connect downtown National City and other residential areas with the military base and waterfront.

Of National City's civilian population, 25,221 residents are employed in a variety of industries. The largest employment industries include educational services and health care and social assistance (20.0%), arts, entertainment, and recreation, and accommodation and food services (15.8%), retail trade (15.0%), and professional, scientific, and management, and administrative and waste management services (12.3%).⁷

The average commute time for National City residents is 27.2 minutes and a majority (67.5%) of commute trips occur by drive alone vehicle trips. As discussed in the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice (AI), low-income households typically spend a much higher proportion of their after-tax income on transportation than the average household. Improving access to public transit is important not only for providing a more affordable transportation option but also improving access to regional employment centers and other resources for all National City residents. The three largest regional employment centers include Sorrento Valley, Kearny Mesa, and Downtown San Diego⁸ and are located to the north of National City.

National City has an approximately 64.8 percent labor force participation rate, with a 50.6 percent employment/population ratio and 6.6 percent unemployment rate. Of the population aged 25 to 64 years old, which represents approximately 52.1 percent of the total population, there is a relatively high (8.1 percent) unemployment rate among persons with less than high school graduate educational attainment, who represent approximately 21.2 percent of the total population.⁹

Education

Education is an important guiding principal emphasized in the city's overall General Plan. Residential areas are organized around the "neighborhood unit concept" where elementary schools act as the focal point of each neighborhood. National School District includes 10 public schools in National City that offer K-6 instruction. Sweetwater Union High School District includes four campuses in National City that offer 7-12 instruction and continuing education. Southwestern Community College District provides higher education instruction for South Bay communities and includes a campus in downtown National City. The San Diego

⁶ ACS, Table DP03: Selected Economic Characteristics 5-Year Estimates 2015-2019.

⁷ ACS, Table DP03: Selected Economic Characteristics 5-Year Estimates 2015-2019.

⁸ SANDAG Employment Centers.

<https://www.sandag.org/index.asp?classid=16&subclassid=127&projectid=581&fuseaction=projects.detail>

⁹ ACS, Table S2301 Employment Status 5-Year Estimates 2015-2019.

County Office of Education also has Regional Education Center located adjacent to the Southwestern Community College campus.

Several of the K-12 public schools in National City receive Title I financial assistance to meet the needs of educationally at-risk students. To qualify as a Title I school, 40% or more of a school's students must come from low-income households. In National City, 43.2% of children under 17 years old live in low-income working families.¹⁰ National City has the highest youth poverty rate in San Diego county (28.4%).¹¹ In National Schools District and Sweetwater Union High School District, 76% of students are considered high-need,¹² and 68.5% of students qualify for free or reduced price lunches (note that Sweetwater Union High School District includes schools that do not serve National City residents and instead serve Chula Vista residents; data that includes this school district is thus skewed slightly lower as Chula Vista has a considerably higher median income than National City).¹³ Additionally, of the population 25 years and over, 25.1% have no diploma and 74.9% have a high school degree or higher. 14.2% of National City residents have a Bachelor's degree or higher. Figure A- 24 shows the TCAC opportunity areas education scores, which scores census tracts based on their education opportunities and likely outcomes of students using the education resources available in their area. Within National City, there are more education opportunities and better outcomes in the southeastern census tracts. Regionally, National City's scores are similar to those of neighboring areas in Chula Vista, Imperial Beach, and central and southern San Diego, but are lower than most areas in the northern portion of the county. National City has an adopted Education and Public Participation Element as a part of its General Plan that acknowledges that the city has had historically lower educational achievement levels than San Diego County and includes goals and policies to coordinate with school districts and expand access to higher education opportunities.

¹⁰ KidsData, Children Living in Low-Income Working Families, by City, School District and County (10,000 Residents or More) 2012-2016. <https://www.kidsdata.org/topic/789/low-income-families10/table#fmt=1204&loc=1243,1212&tf=107&sortType=asc>

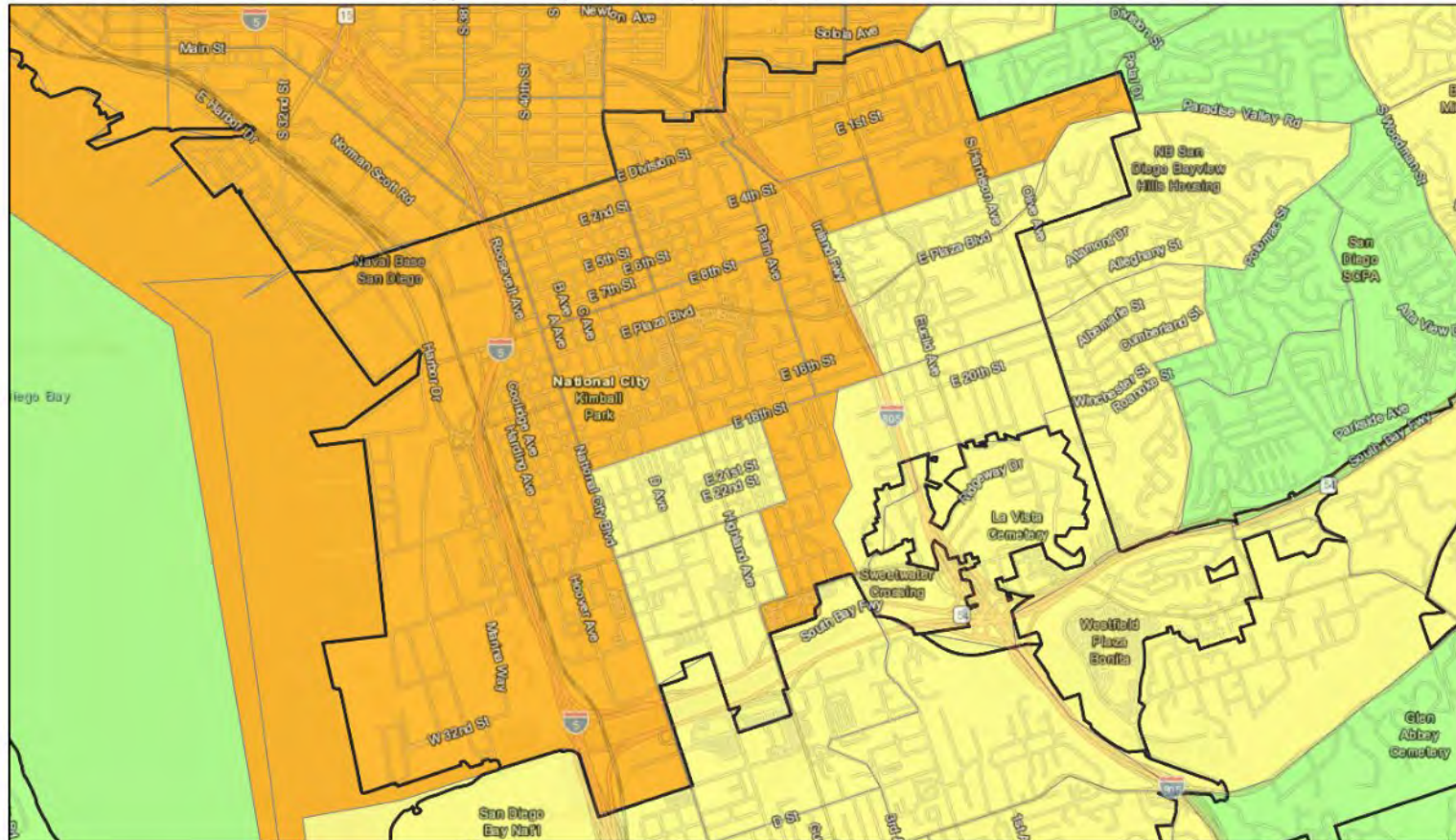
¹¹ Center on Policy Initiatives, Poverty, Income and Earnings in South County, 2018. June 2020. <https://cpisandiego.org/poverty-income-earnings-south-county-2018/>

¹² KidsData, High-Need Students (Unduplicated Pupil Count) 2019. <https://www.kidsdata.org/topic/2188/unduplicated-pupil-count/table#fmt=2693&loc=1243,1259&tf=124&sortType=asc>

¹³ KidsData, Students Eligible for Free or Reduced Price School Meals 2020. <https://www.kidsdata.org/topic/518/school-meals/table#fmt=675&loc=1259,1243&tf=110&sortType=asc>

Figure A- 24

TCAC Opportunity Areas (2021) - Education Score - Tract



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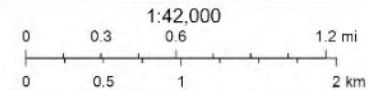
City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75



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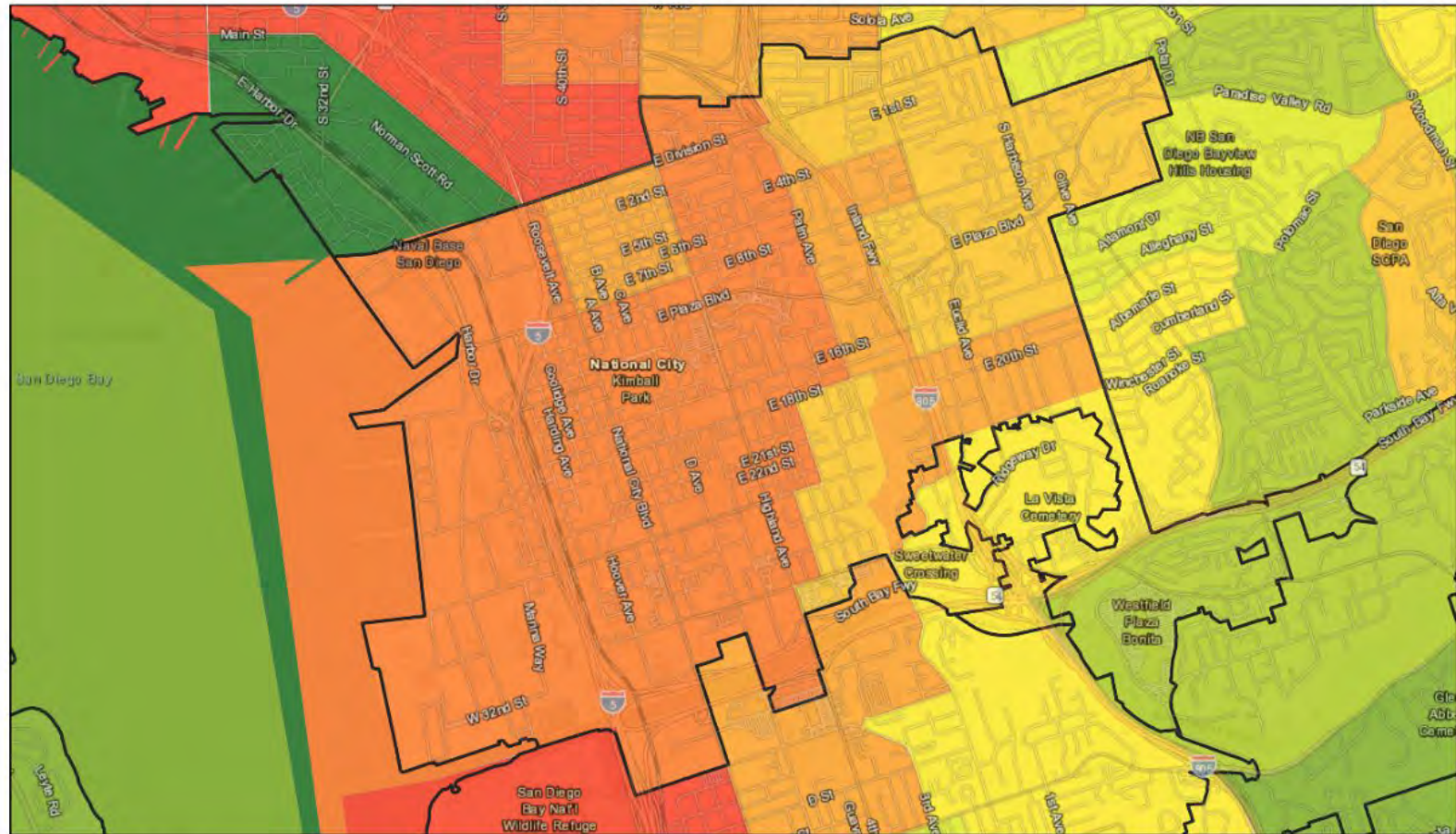
Source: HCD AFFH Data Viewer, TCAC Opportunity Areas – Education Score – Tract, California Tax Credit Allocation Committee, 2021.

Environmental

National City has experienced a history of environmental justice issues due to land use decisions that have placed industrial uses adjacent to residential neighborhoods for decades. The CalEnviroScreen index was developed by the California Office of Environmental Health Hazard Assessment and shows pollution burden levels. The scoring system takes into account the number of pollution sources and the socioeconomic characteristics and health status of the community. Communities with a higher score are disproportionately burdened by pollution sources and are more vulnerable to it. All census tracts within National City are within the 56th to 85th percentiles of the CalEnviroScreen 4.0 index, shown in Figure A- 25, indicating a significant pollution burden and vulnerability throughout the city. The western portion of National City is among the top 25 percent of impacted tracts across the State of California identified by CalEnviroScreen 4.0. The western area of National City qualifies as both an SB 535 disadvantaged community and AB 1550 low-income community, shown in Figure A- 26. Compared to the region, National City has generally higher CalEnviroScreen scores: Chula Vista's scores range from the 11th to 90th percentile, San Diego's scores range from the 31st to 100th percentile, and Coronado's scores range from the 1st to 10th percentile.

Figure A- 25

CalEnviroScreen 4.0 2021 – Tract



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City/Town Boundaries

(A) CalEnviroScreen 4.0, 2021 - Tract

1 - 10% (Lowest Scores)

21 - 30%

31 - 40%

41 - 50%

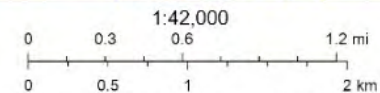
51 - 60%

61 - 70%

71 - 80%

81 - 90%

91 - 100% (Highest Scores)



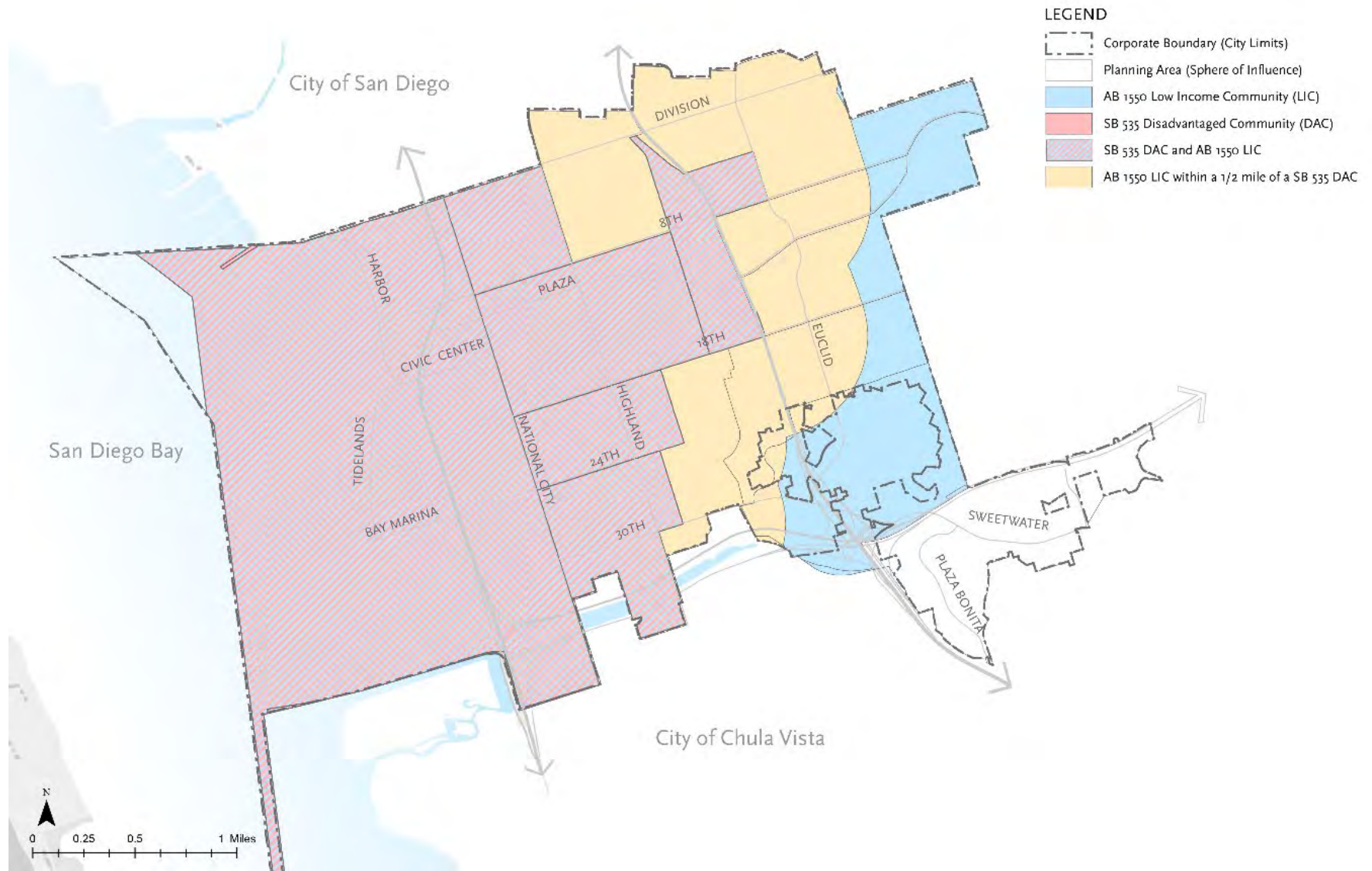
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Source: HCD AFFH Data Viewer, Office of Environmental Health Hazard Assessment, 2021.

Figure A- 26: SB 535 and AB 1550 Communities



Source: California Environmental Protection Agency, 2018.

Transportation

AllTransit is a dataset prepared by the thinktank Center for Neighborhood Technology that uses General Transit Feed Specification (GTFS) data to measure transit access and show transit's social and economic impacts. The 2020 AI uses AllTransit data as a metric for assessing the transit opportunity indicator. National City's AllTransit performance score is 7.9, which is among the highest in the region. San Diego's score is 6.0, Chula Vista's score is 5.7, and Coronado's score is 6.6. National City's high score is due to its "very good" combination of trips per week and number of jobs accessible that enable many people to take transit to work. 90,154 jobs are accessible to National City households within 30 minutes on transit, and 7% of commuters use transit to get to work. In comparison, 82,735 jobs are accessible to households within 30 minutes on transit for all of San Diego County, and only 3% of commuters use transit to get to work.¹⁴

Summary

Table A- 6: Summary of Access to Opportunity Indicators

	National City	San Diego County
Poverty Rate		
Population Below Federal Poverty Level		
White Alone	19.5%	11.0%
Black or African American Alone	17.0%	18.9%
American Indian and Alaska Native Alone	19.4%	16.5%
Asian Alone	15.0%	10.0%
Native Hawaiian and other Pacific Islander Alone	0.0%	13.7%
Hispanic or Latino Origin (of any race)	20.2%	15.6%
Other	36.0%	27.3%
School Proficiency		
Total Title I Schools	12	412
Total Schools	14	656
Percent of Schools	86%	63%
Unemployment		
Unemployment Rate	6.6%	5.6%
Job Proximity		
Less than 10 minutes	8.5%	8.2%
10 to 14 minutes	11.6%	12.5%
15 to 19 minutes	16.5%	16.4%
20 to 24 minutes	17.3%	17.0%
25 to 29 minutes	6.3%	7.3%

¹⁴ AllTransit, Metrics. <https://alltransit.cnt.org/metrics>

	National City		San Diego County			
30 to 34 minutes	16.3%		16.1%			
35 to 44 minutes	7.2%		7.4%			
45 to 59 minutes	7.5%		7.7%			
60 or more minutes	8.9%		7.3%			
Mean travel time to work (minutes)	27.2		26.5			
Transit						
All Transit Performance Score	7.9		5.3			
Transit Trips Per Week within 1/2 Mile	2,573		1,358			
Transit Routes within 1/2 Mile	7		4			
Jobs Accessible in 30-Minute Trip	90,154		82,735			
Commuters Who Use Transit	7.03%		3.28%			
CalEnviroScreen Percentile						
Census Tract	Score	Percentile	Score	Percentile		
06073003204	17.04	31.87	18.64	33.92		
06073003207	18.38	35.23				
06073003212	18.99	36.96				
06073011601	43.92	81.87				
06073011602	45.66	84.20				
06073011700	47.15	85.86				
06073011801	40.79	77.91				
06073011802	42.79	80.49				
06073011902	30.90	62.18				
06073012002	31.84	63.91				
06073012003	32.58	64.73				
06073012101	33.92	67.45				
06073012102	42.31	79.87				
06073021600	15.27	27.30				
06073021900	44.77	82.99				
06073012200	38.18	73.88				
06073022000	28.97	58.97				
Sources:						
Note: Due to ACS demographics calculation methods, sums of race categories do not equal 100%. This data is aggregated by race and ethnicity.						
AllTransit, Metrics. https://alltransit.cnt.org/metrics						
CalEnviroScreen 4.0 Results (March 2021 Update).						
ACS, Table S2301 EMPLOYMENT STATUS 5-Year Estimates 2015-2019.						
ACS, Table S1701 POVERTY STATUS IN THE PAST 12 MONTHS 5-Year Estimates 2015-2019.						
ACS, Table S0801 COMMUTING CHARACTERISTICS BY SEX 5-Year Estimates 2015-2019.						
https://www2.ed.gov/admins/lead/account/consolidated/sy13-14part2/cas.pdf						

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.

Table A- 7 shows a summary of National City and San Diego County households, broken down by tenure and race/ethnicity, that experience at least one of the housing problems listed above. The total number of households experiencing a housing problem is 13% greater in National City (58%) than it is in the region (45%) and is particularly high for Hispanic residents in both geographies (39% and 58%). National City also has a significantly lower percentage of white residents than the county (13.5% vs 45.1%). Thus, the high discrepancy between the number of white households experiencing housing problems in National City (5%) and San Diego County (39%) is likely due to the high difference in the number of white residents in each geography. On average, renters experience housing problems more often than homeowners in all racial/ethnic groups and in both National City and San Diego county.

Table A- 7: Housing Problems by Tenure and Race/Ethnicity

With One or More Housing Problems	White	Black	Asian	American Indian	Pacific Islander	Hispanic	Other	All
National City								
Owner	6%	1%	8%	0%	0%	23%	0%	38%
Renter	5%	4%	11%	0%	0%	47%	1%	67%
All Households	5%	3%	10%	0%	0%	39%	1%	58%
San Diego County								
Owner	31%	40%	34%	25%	32%	43%	36%	34%
Renter	51%	62%	51%	52%	61%	67%	55%	57%
All Households	39%	55%	41%	38%	52%	58%	47%	45%
Note: This data is aggregated by race and ethnicity. Source: HUD, Consolidated Planning/CHAS Data, National City, 2013-2017 ACS.								

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.¹⁵ If a household spends more than 30 percent of its monthly income on housing, the household is considered cost burdened.

Table A- 8 shows housing cost burden by race/ethnicity for National City and San Diego County. A high percentage of Hispanic residents have housing cost burdens in National City, but this percentage is lower than the total for San Diego County. The reason that this figure is much higher for Hispanic National City residents than other ethnic groups is due to the fact that National City is a Hispanic-majority city. Figures Figure A- 27 and Figure A- 28 show overpayment of renters and owners, respectively, by census tract. While more renters than owners overpay for their housing in National City, at least 20% of residents in all census tracts are overpaying. In census tracts in the northeast portion of the city, more renters than owners overpay for their housing. This trend may be due to the concentration of single-family houses in this area. These houses may be larger in size than multifamily units that are more common elsewhere in the city and may thus have higher rents, leading to more housing cost burden.

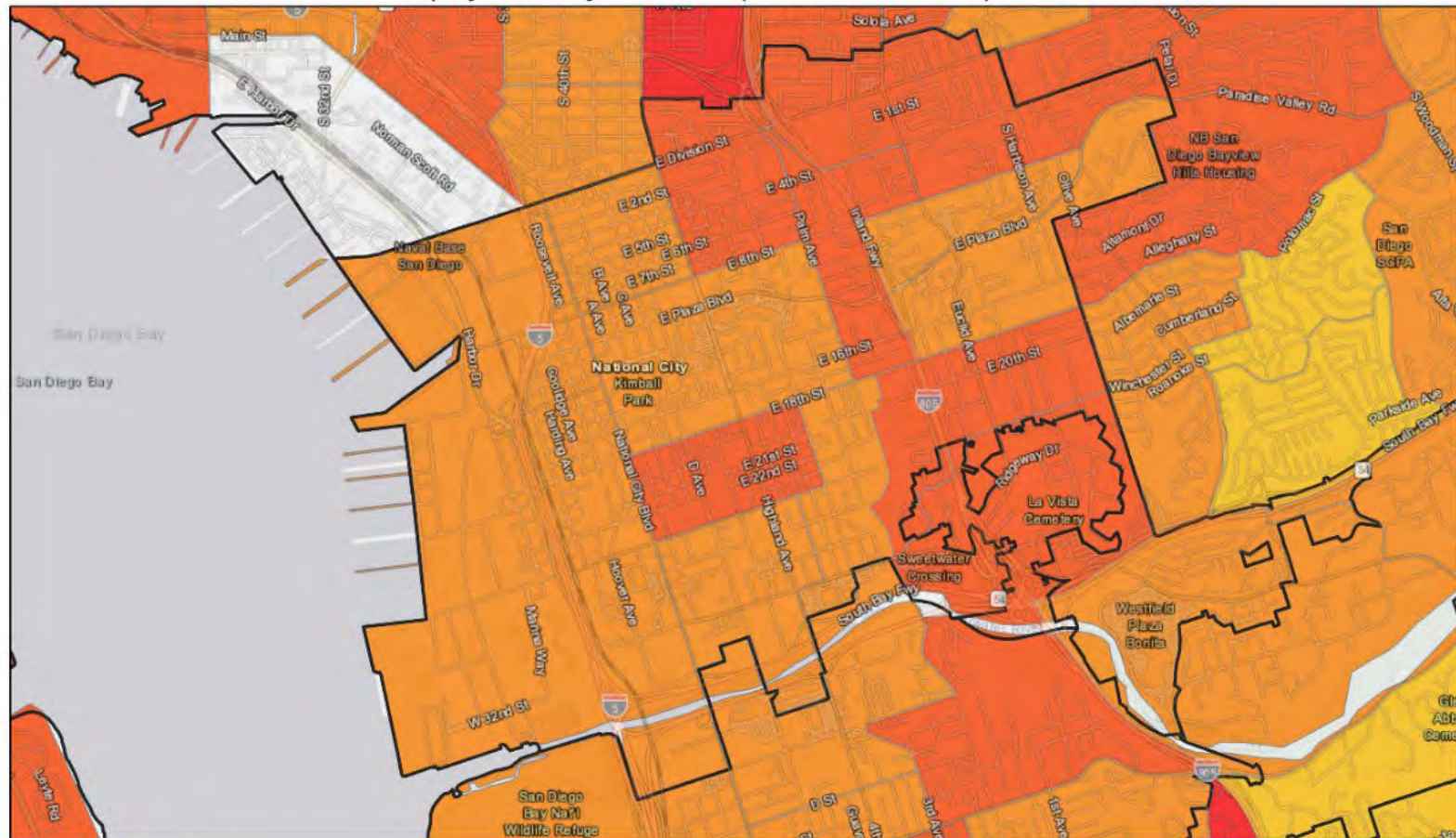
Table A- 8: Housing Cost Burden by Tenure and Race/Ethnicity

Cost Burden >30% AMI	White	Black	Asian	American Indian	Pacific Islander	Hispanic	Other	All
National City								
Owner	5%	1%	6%	0%	0%	17%	0%	31%
Renter	5%	3%	8%	0%	0%	40%	1%	57%
All Households	5%	3%	8%	0%	0%	33%	1%	49%
San Diego County								
Owner	30%	38%	31%	22%	0%	36%	34%	32%
Renter	49%	59%	44%	46%	54%	58%	51%	52%
All Households	38%	52%	36%	34%	47%	50%	44%	41%
Note: This data is aggregated by race and ethnicity. Source: HUD, Consolidated Planning/CHAS Data, National City, 2013-2017 ACS.								

¹⁵ County of San Diego Housing and Community Development Services, Rental Assistance and Affordable Housing Directory 2020.

Figure A- 27

Overpayment by Renters (ACS 2015-2019) - Tract



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City/Town Boundaries

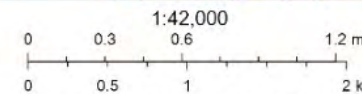
(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

20% - 40%

40% - 60%

60% - 80%

> 80%



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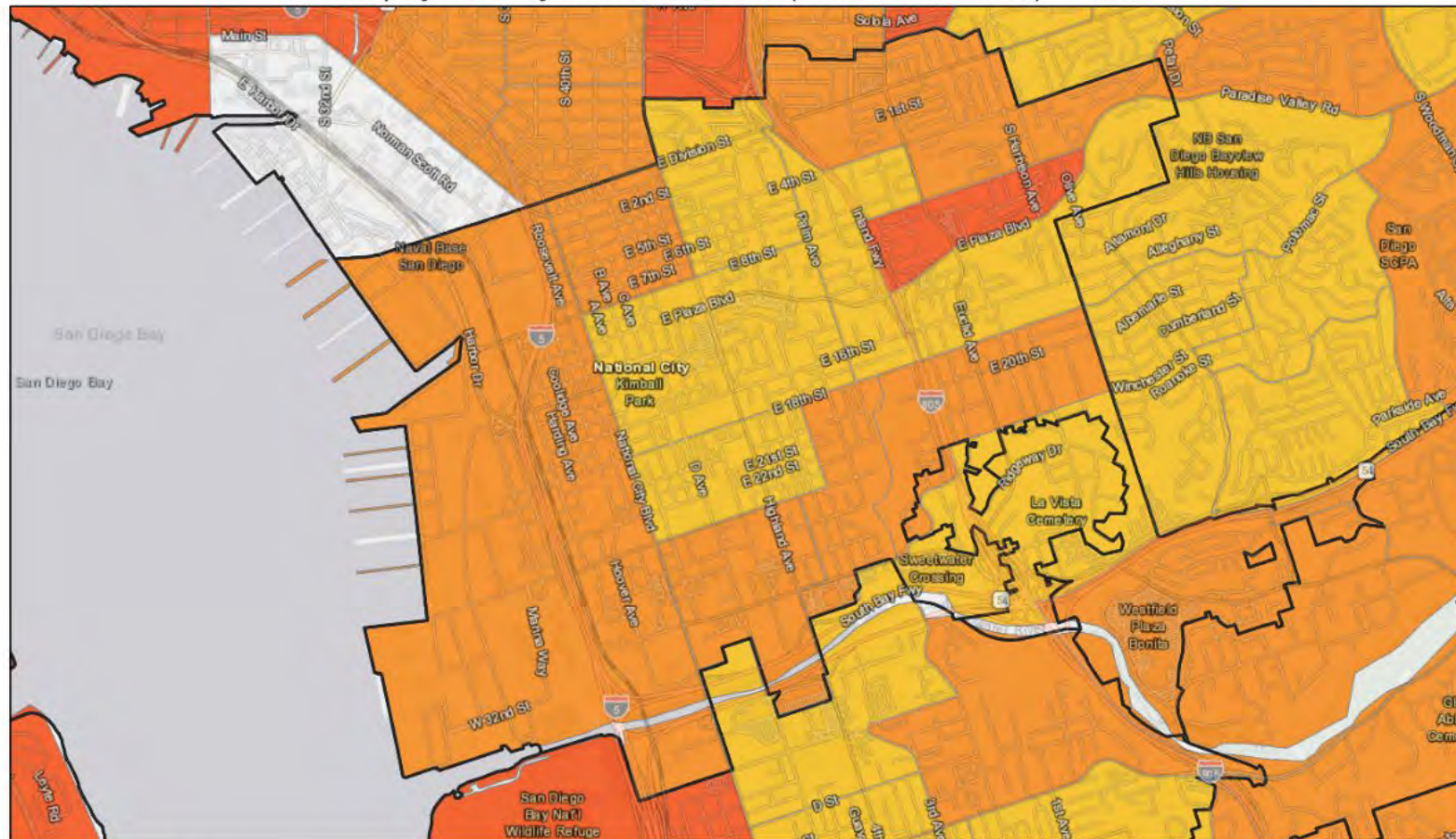
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Source: HCD AFFH Data Viewer, Overpayment by Renters – Tract, ACS 5-Year Estimates 2015-2019.

Figure A- 28

Overpayment by Home Owners (ACS 2015-2019) - Tract



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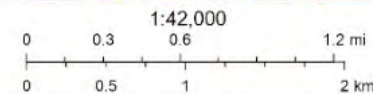
City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

20% - 40%

40% - 60%

60% - 80%



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Source: HCD AFFH Data Viewer, Overpayment by Home Owners – Tract, ACS 5-Year Estimates 2015-2019.

Overcrowding

Out of the 16,658 occupied housing units in National City, approximately 5,841 households identify as a four-or-more-person household (i.e. approximately 35.1% of the total occupied households in the City). As of 2019, approximately 17,652 total housing units exist within the City, with only 1,608 of those units at minimum adequately sized for a five-person household (five rooms) (i.e. 9.1% of total households).¹⁶

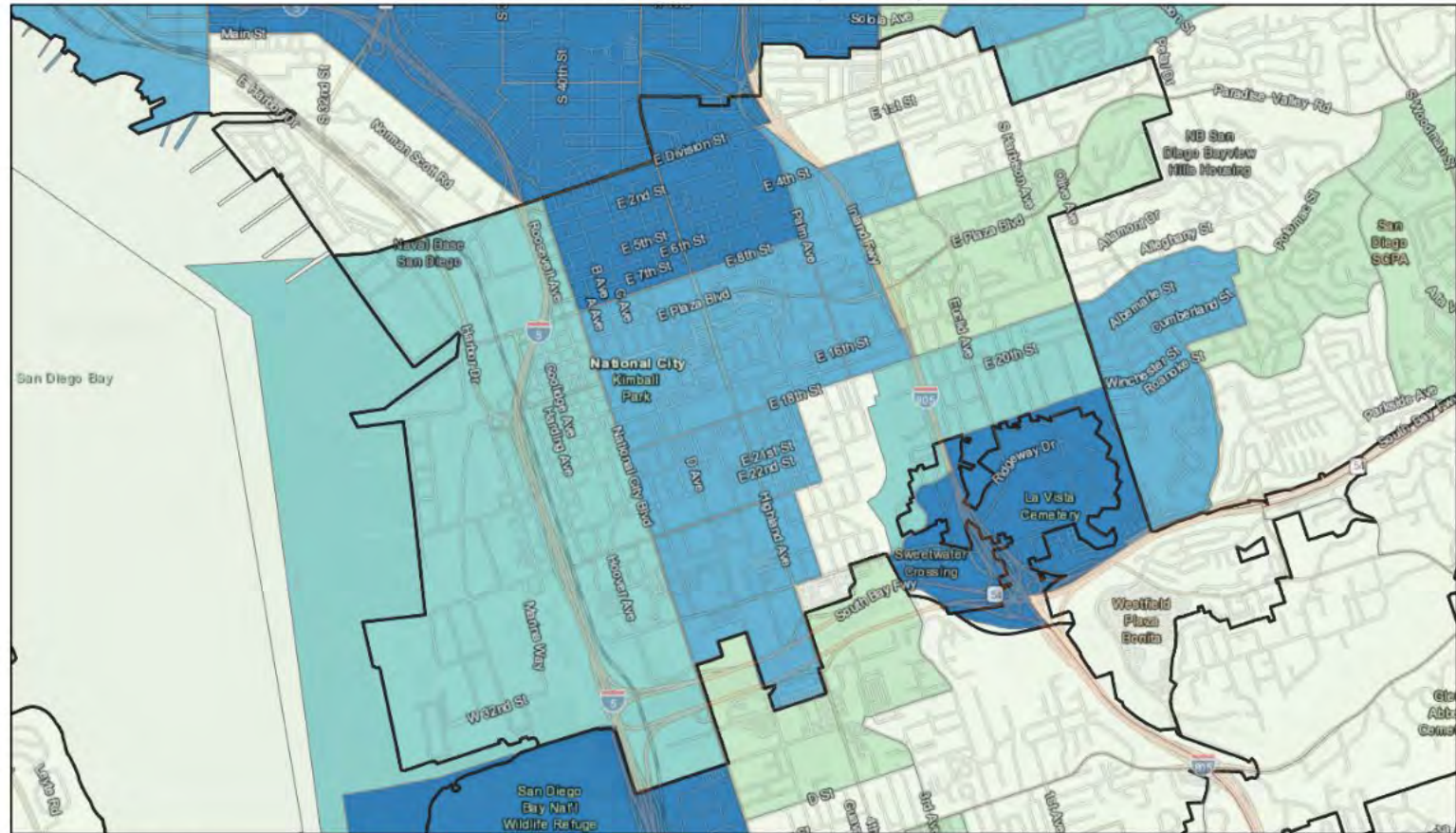
Recognizing that household overcrowding is not only measured by the number of people per household, persons per room is also used as a metric. Households which have an average of between one and 1.5 occupants per room are considered overcrowded, while households with greater than 1.5 occupants per room are considered severely overcrowded. Using these measures of overcrowding, in 2019 National City had 1,533 overcrowded units (8.7% of total households) and 903 (5.1% of total households) severely overcrowded units. Furthermore, 349 (2.0% of total households) of the overcrowded units were owner-occupied and 1,184 (6.7% of total households) were renter-occupied. 162 (0.9% of total households) severely overcrowded units were owner-occupied and 741 (4.2% of total households) were renter-occupied.¹⁷ As seen in Figure A- 30, overcrowded households in the San Diego region are concentrated in the southern portion of the county, especially in National City and the communities bordering it. Within National City, overcrowded households are concentrated in the western portion of the city, with the most overcrowded census tracts located in the north Central neighborhood and in Lincoln Acres. Overcrowded households by census tract are shown in Figure A- 29.

¹⁶ ACS, Table S2501 Occupancy Characteristics 5-Year Estimate 2015-2019.

¹⁷ Ibid.

Figure A- 29

Overcrowded Households (CHHS) - Tract



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City/Town Boundaries

(R) Overcrowded Households (CHHS) - Tract

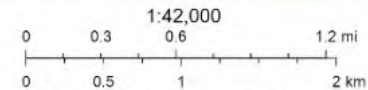
≤ 8.2% (Statewide Average)

8.3% - 12%

12.01% - 15%

15.01% - 20%

> 20%



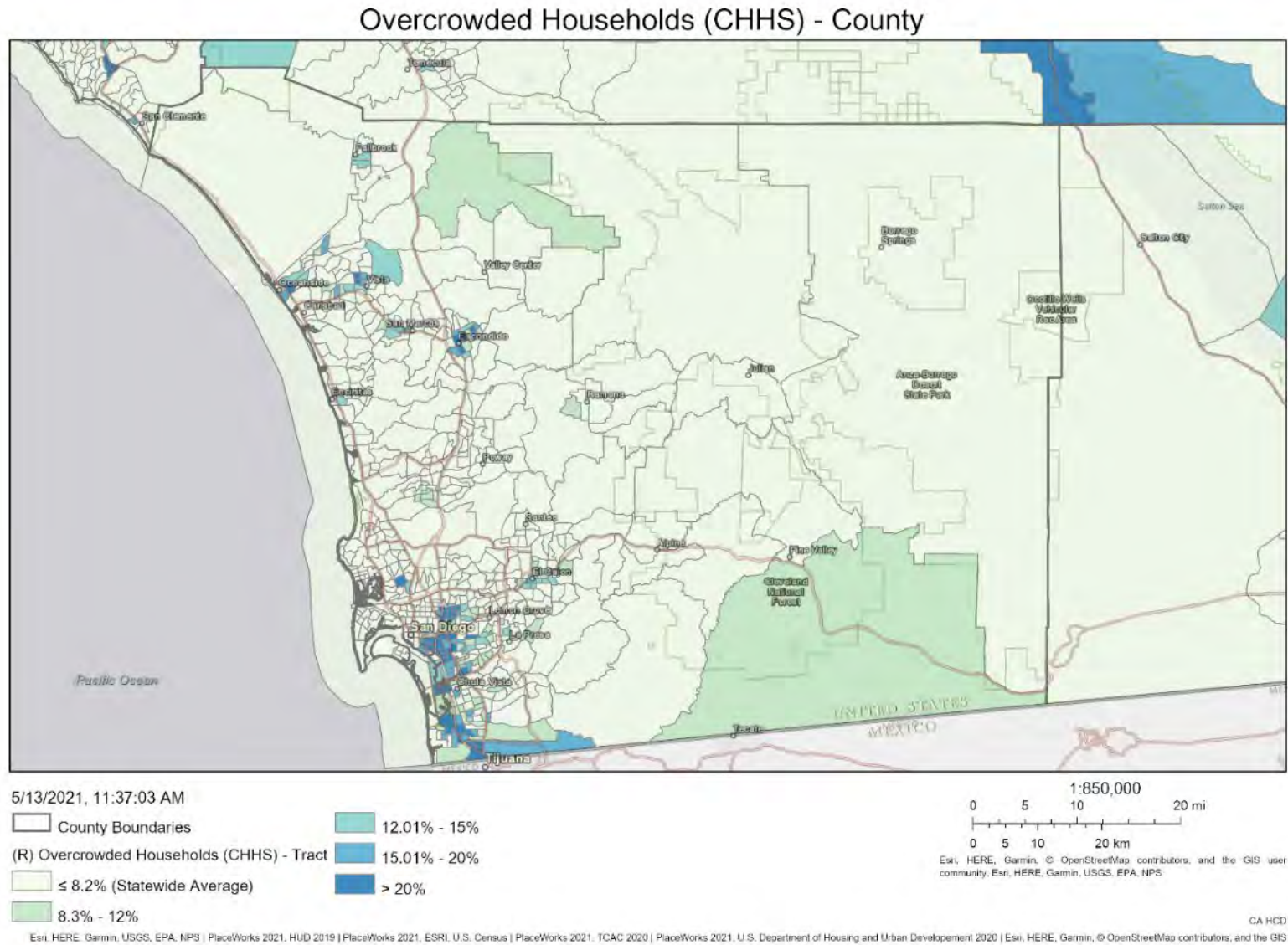
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Source: HCD AFFH Data Viewer, Overcrowded Households – Tract, CHHS, CHAS, ACS 5-Year Estimates 2011-2015.

Figure A- 30



Source: HCD AFFH Data Viewer, Overcrowded Households – Tract, CHHS, CHAS, ACS 5-Year Estimates 2011-2015.

Substandard Housing

A factor used to determine housing condition is the age and state of the home. As seen in Table A- 9, the majority of homes in National City were built approximately 40 to 60 years ago. Homes over 30 years old are generally in adequate conditions and are in need of only minor repairs and modernizations. However, homes over 50 years old have an increased likelihood of being in need of more major repairs to key systems and building components. In National City, 72.6% (12,097) of homes were constructed 40 to 60 years ago and are thus at a higher risk of being in need of repair or replacement. The city currently sees these housing condition issues playing out in older units; city housing and code inspectors see deferred maintenance of roofing and structural members, flooring, plumbing, and outdated electrical systems that cannot handle the load of modern appliances. Approximately 1,362 housing-related code violations were abated during the 5th Cycle planning period, as well, which represents approximately 8.2% of National City's housing stock.

Substandard units are those in need of repair or replacement. Based on ACS data, 1.3% of housing units in National City display substandard conditions. Approximately 0.3% of housing units lack complete plumbing facilities and 1.0% lack complete kitchen facilities. Based on this data, at a minimum 202 units (1.2%) within National City are substandard and in need of rehabilitation. In the San Diego Metropolitan Service Area, 7.2% of homes have a basic housing quality problem – either a moderate or severe physical problem.¹⁸

The current distribution of the age of homes in National City also indicates that a majority of homes in the City were built prior to the 1990 Americans with Disabilities Act (ADA), which results in a lack of accessible homes for those residents experiencing a disability. The City's older housing stock also reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in National City who likely have a lower income or a fixed income, such as seniors.

Table A- 9: Age of Homes in National City

Year Built	Number of Occupied Housing Units	Percent
Built 2014 or later	138	0.8
2010-2013	246	1.5
2000-2009	811	4.9
1980-1999	3,366	20.2
1960-1979	6,236	37.4
1940-1959	4,590	27.6
1939 or older	1,271	7.6
Total	16,658	100

Source: ACS, Table S2504 PHYSICAL HOUSING CHARACTERISTICS FOR OCCUPIED HOUSING UNITS 5-Year Estimate 2015-2019.

¹⁸ National Center for Healthy Housing, San Diego CA Metrics, 2018. <https://nchh.org/tools-and-data/data/state-of-healthy-housing/rankings/location/san-diego-ca/?data-year=2018>

Homelessness

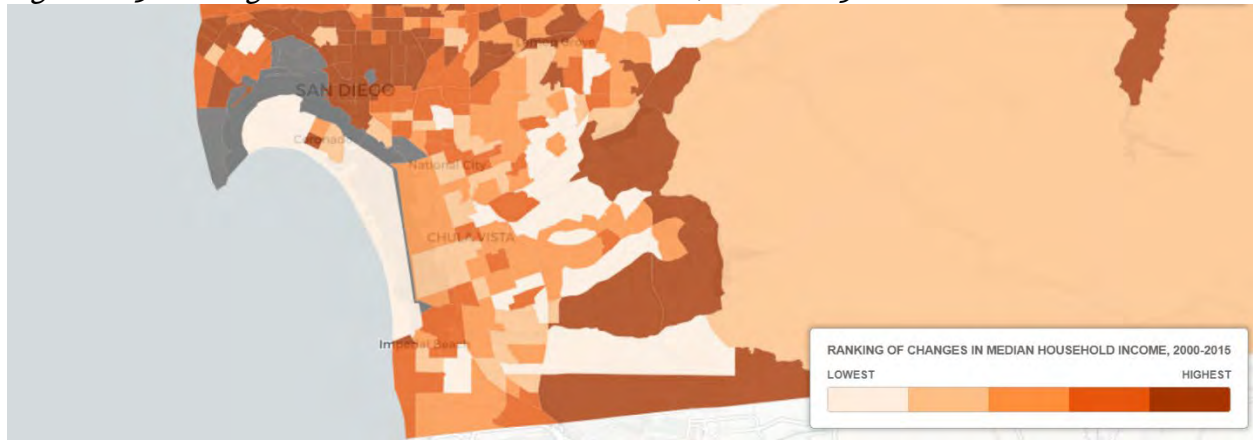
People experiencing homelessness are those who do not have a fixed, regular, and adequate overnight residence, or whose overnight residence is a shelter, street, vehicle, or enclosure or structure unfit for habitation. Factors contributing to increases of homelessness include a lack of housing affordable to low- and moderate-income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the deinstitutionalization of the mentally ill. According to the Regional Task Force (RTF) on the Homeless WeAllCount (PITC) annual estimates, as of 2020, the total point in time count of those persons in National City “living on the street” or staying in homeless shelters is estimated at 128 persons. This number is higher than the 2019 figure of 94 persons. The number of chronically homeless people in National City is 21, or 17% of the unsheltered population. 25% of the unsheltered population identifies as female; 7% are veterans; and 1% are youth. When contextualized with the total number of people residing in National City, the 128 homeless individuals represent approximately 0.2% of the population. In neighboring jurisdictions of Chula Vista and San Diego, the point in time count of homeless persons in 2020 was 313 and 4,887, respectively, representing 0.1% and 0.3% of the cities’ total populations. Regionally, the 2020 point in time count of homeless persons in San Diego County was 7,619, representing 0.2% of the total population.¹⁹

Displacement Risk

Preventing displacement is vital to ensuring fair housing in National City. Displacement can occur with neighborhood change if households are unable to remain in their homes. While there is no single metric to track displacement, it can be measured through several types of data that are indicators of displacement risk and often look at change over time. Some of these key indicators are a decline in lower income households, an increase in gross rent, and a sustained high proportion of cost burdened renter households. Figures A- 31 through A- 34 show these indicators between 2000 and 2015 for the National City and the San Diego region. As seen in Figure A- 31, the median household income did change in National City from 2000-2015. While the intensity of the change was the not the greatest in the nearby region, it was also not among the lowest and is an indicator of moderate displacement risk. Similarly, as seen in Figure A- 32, National City experienced a change in median gross rent during this time period, but the intensity of this change was not among the highest in the region. Figures A- 33 and A- 34 show that National City has a sustained high percentage of rent burdened households. Within the city, there are few areas with significant and clear differences in change of gross rents and median incomes. However, some census tracts in the northeastern portion of the city have experienced higher changes in median gross rents, lower changes in median household income, and sustained higher percentages of renter burdened households, which indicates potential displacement risk in this area due to rising rents and incomes that are not keeping pace.

¹⁹ Regional Task Force on the Homeless, 2020 WeAllCount Annual Report for San Diego Region.
<https://www.rtfhsd.org/wp-content/uploads/WeAllCount.pdf>

Figure A- 31: Changes in Median Household Income, 2000-2015



Source: Urban Displacement Project, University of California Berkeley, ACS 2015.

Figure A- 32: Change in Median Gross Rent, 2000-2015



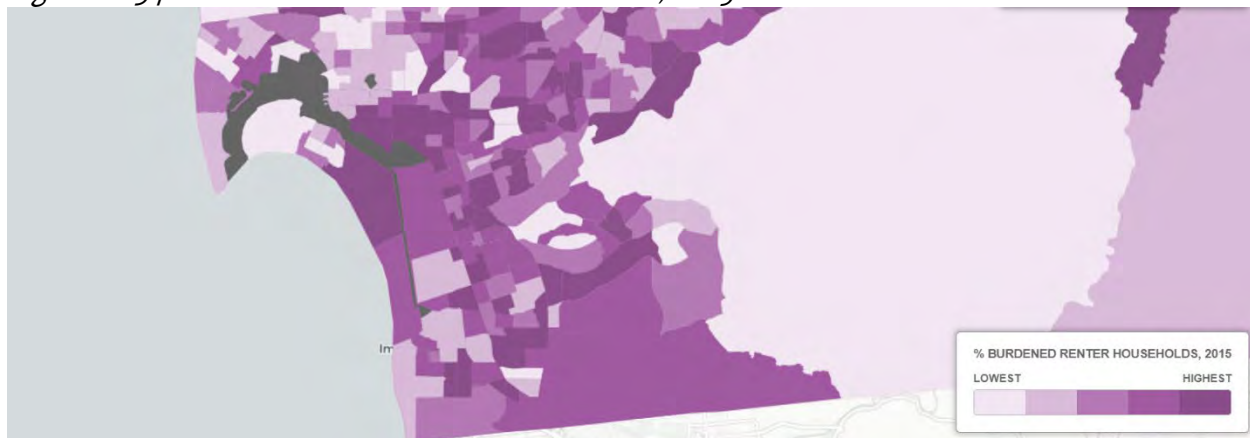
Source: Urban Displacement Project, University of California Berkeley, ACS 2015.

Figure A- 33: Percent Rent-Burdened Households, 2000



Source: Urban Displacement Project, University of California Berkeley, ACS 2015.

Figure A- 34: Percent Rent-Burdened Households, 2015



Source: Urban Displacement Project, University of California Berkeley, ACS 2015.

Other Relevant Factors

Age

Senior households often have special needs due to relatively low income levels, disabilities, chronic illnesses, mobility limitations, and/or dependency on caretakers or community services as they continue to age. In National City, approximately 13.4% of the total population was 65 years or older as of 2019, and approximately 12.1% of the population will reach the age of 65 or older within the next decade.²⁰ In addition, approximately 1,725 seniors (2.8% of the total population) in National City live alone.²¹ If the 16,658 housing units in National City, 4,335 (26%) are occupied by individuals who are 65 and older. There is a relatively even distribution of elderly renters and owners in National City, with a slightly higher percentage of elderly residents owning their housing units; 1,921 (12%) of National City's housing units are owned by elderly residents and 2,414 (15%) of the units are rented by elderly residents. Table A- 10 shows the distribution of poverty status by age in National City and San Diego County.

²⁰ ACS, Table DP05: ACS Demographic and Housing Estimates 5-Year Estimates 2015-2019.

²¹ ACS, Table DP02: Selected Social Characteristics in the United States 5-Year Estimates 2015-2019.

While the percentage of those in poverty is higher in National City than in San Diego County for all groups, the second largest difference between the two is for seniors (7.7% difference). This comparison also shows the significant number of children in National City who are in poverty. As discussed in the Education indicator section of the Access to Opportunities Analysis, National City has the highest youth poverty rate in the county and the majority of students qualify for free or reduced price lunches and are considered high-need.

An analysis of National City residents' income by age group shows that children and seniors are the most likely to be in poverty and are particularly vulnerable. Ensuring that these groups have adequate access to quality, affordable housing is vital; this Housing Element includes several goals for ensuring that all ages – especially seniors – have access to affordable housing.

Table A- 10: Percent of Residents Below Poverty Level

Age	National City	San Diego County
Under 18 years	26.4	14.7
18 to 34 years	14.9	13.9
35 to 64 years	16.4	9.2
65 years and over	16.6	8.9
Source: ACS, Table S1701 POVERTY STATUS IN THE PAST 12 MONTHS 5-Year Estimate 2015-2019.		

Tenure

In National City, a clear majority (68%) of residents are renters, compared with a 47% rental rate in San Diego County.²² Renters are often more vulnerable than owners to housing cost burdens and displacement. As shown in Figures A- 35 and A- 36, this very high proportion of renters is a consistent trend in National City. Figure A- 36 also shows that National City has a very high concentration of renters compared to other nearby areas. Within the city, rental rates are the highest in the western census tracts.

²² HUD, Consolidated Planning/CHAS Data, National City, 2013-2017 ACS

Figure A- 35: Percent Renter Households, 2000



Source: Urban Displacement Project, University of California Berkeley, ACS.

Figure A- 36: Percent Renter Households, 2015



Source: Urban Displacement Project, University of California Berkeley, ACS 2015.

Housing Choice Voucher (Section 8)

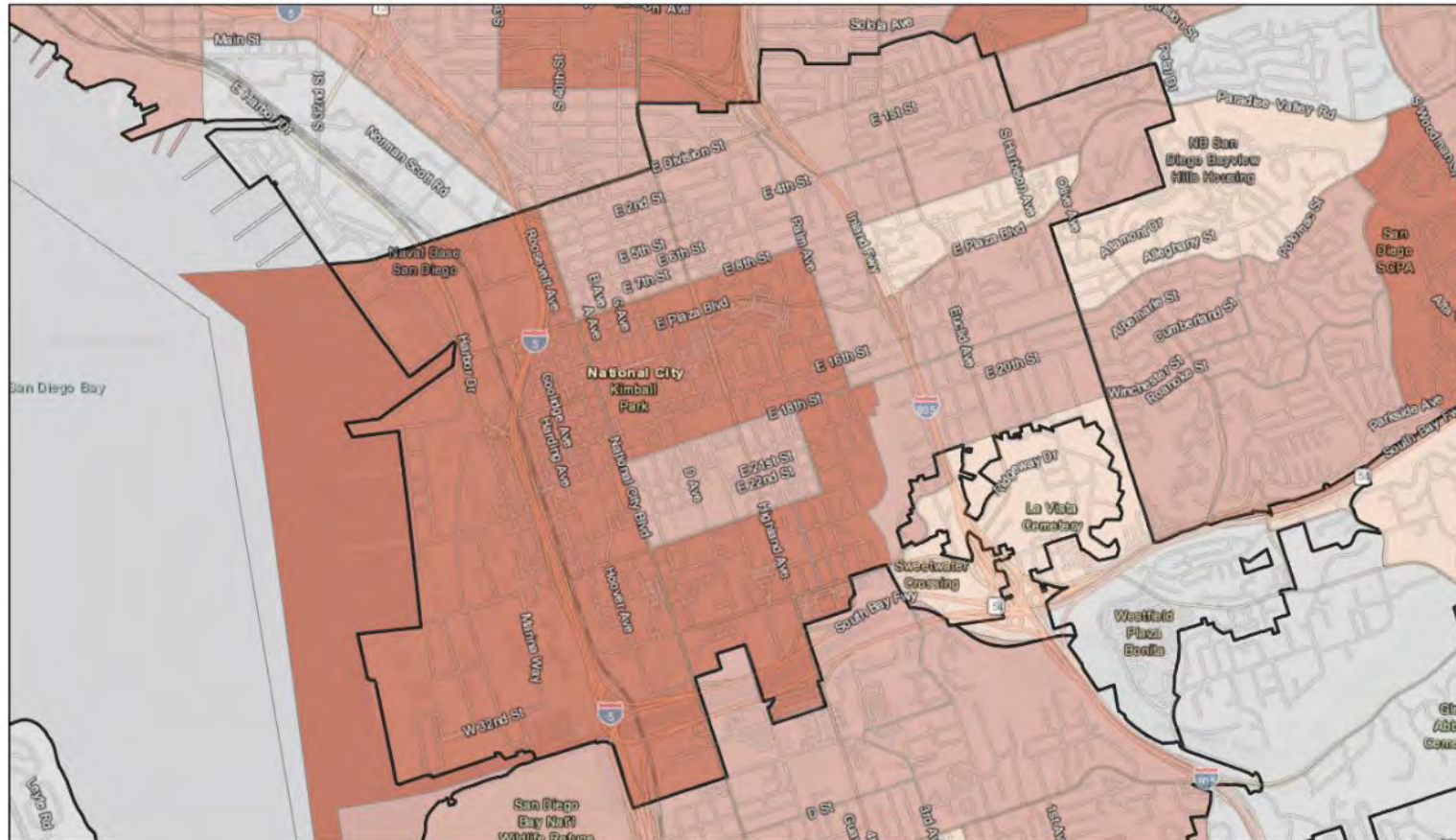
Each housing agency has a cap on the number of Section 8 vouchers it may administer. An agency's number of "authorized vouchers" is essentially the sum of the vouchers the agency has been awarded since the start of the voucher program. Since 2003, new vouchers that Congress has funded have been either "tenant protection" vouchers (which replace either public housing that is demolished or sold or other affordable housing units that lose federal subsidies) or "special purpose" vouchers (which are set aside for particular types of households, such as veterans experiencing homelessness or youth leaving foster care). National City had a slight increase in its number of vouchers in 2012 due to a housing project that lost federal subsidy. Since 2012, the number of Section 8 vouchers in National City has not increased, and remains at 1,123.

The 2020 AI found that National City has a disproportionately high percentage of residents participating the Housing Choice Voucher program (Section 8) when considering its population in relation to the county. As seen in Figure A- 37, within the city, census tracts in the western portion have a higher percentage of Section 8 Voucher users than those in the

eastern portion. The western portion of the city has lower median incomes, a higher percentage of low- to moderate-income households, a higher percentage of female-headed households with children, a higher percentage of households living in poverty, and a higher percentage of overcrowded households.

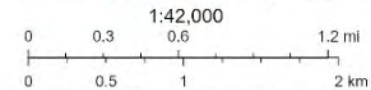
Figure A- 37

Housing Choice Vouchers - Tract



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- City/Town Boundaries
- > 0 – 5%
- (R) Housing Choice Vouchers - Tract > 5% – 15%
- No Data
- > 15% – 30%



San Diego Unified Port District, City of Chula Vista, SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, OpenStreetMap contributors, and the GIS user community

CA HCD

PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | PlaceWorks 2021, ESRI 2021, FEMA 2020 | PlaceWorks 2021, Public Health Alliance of Southern California

Source: HCD AFFH Data Viewer, Housing Choice Vouchers – Tract, HUD, 2021.

Summary of Fair Housing Issues

Key Issues: Regional Analysis of Impediments to Fair Housing Choice

The 2020 AI assesses regional laws, ordinances, statutes, policies, and local conditions that impact the accessibility and availability of housing in San Diego county. The region's demographic profile is used to assess housing needs of specific income groups and housing that is reasonably available to them. The study uses this assessment to propose measures to mitigate impediments to fair housing. National City was a participant in this study. The AI identifies several impediments to fair housing throughout the San Diego region; issues relevant to National City include:

- **Lending and credit counseling.** Across San Diego County, Hispanics and Blacks continue to be under-represented in the homebuyer market and experienced large disparities in loan approval rates. National City is among the jurisdictions with the highest rates of withdrawn/closed applications as well as the lowest home loan approval rates (under 65%) in the County. Aside from income, an insufficient understanding of the homebuying and lending processes can be an impediment. Other factors may include credit history and the availability and amount of a downpayment.
- **Overconcentration of Housing Choice Vouchers.** National City represents approximately two percent of the total population of the County, but residents use approximately four percent of the total Housing Choice Vouchers (HCV) (Section 8) issued in the County. This discrepancy reflects a higher concentration of a lower income population in the city as compared to other parts of the region.
- **Housing Options.** Housing choices for special needs groups are limited. Compared to other jurisdictions, National City has a higher percentage of large households with five or more members (19% of households) and female-headed households with children (11.8% of households) and may be more vulnerable to familial discrimination. Income constraints can also limit the ability of households to afford adequate housing, childcare, and other necessities. In addition, approximately 11.3% of the total population in National City has a disability. A majority of homes were built prior to 1990 (30 or more years ago). An older housing stock can create barrier for persons with disabilities who need home modifications or other improvements. The housing needs of these and other special needs groups are discussed further in subsequent sections of this chapter.
- **Enforcement.** Organizations such as the Legal Aid Society San Diego and CSA San Diego have conducted periodic testing for housing discrimination across San Diego County. In FY 2020, National City tested for discrimination based on disability, national origin and race. Of the six sites tested within the city, three showed unequal treatment; one based on national origin and two based on race.
- **Racial segregation and linguistic isolation.** In National City, approximately 70.3% of the total population speaks a language other than English at home. In addition, approximately 28.1% of the total population speaks English less than "very well." A

population that is both minority and does not speak English well may face discrimination based on national origin as well as challenges related to obtaining housing, such as communicating effectively with a property owner, landlord, rental agent, real estate agent, mortgage lender or insurance agent.

In addition to the factors above, the AI identifies outreach and education as a general impediment to fair housing across the region. Today, people obtain information through many media forms, not limited to traditional newspaper noticing or other print forms. The study recommends conducting frequent workshops and multi-media campaigns and partnering with other community-based organizations to allow for meaningful discussions and the dissemination of useful information.

The AI also identified impediments to fair housing resulting from land use policies. Due to recent changes to state housing legislation, the following were recommended amendments to National City's zoning code:

- Density bonus
- Accessory dwelling units
- Low barrier navigation centers and emergency shelter capacity and parking standards
- Transitional and supportive housing
- Farmworker employee housing

National City is undergoing a comprehensive municipal code update (House Element Program 15) to address these recent changes to state legislation and ensure compliance. These updates include:

- Adding direct language about the specific, updated requirements of the state density bonus program, rather than referencing the applicable Government Code section
- Allowing accessory dwelling units in all residential zones and adopting an accessory dwelling unit ordinance
- Amending emergency shelter capacity and parking standards. Allowing low barrier navigation centers by right in mixed-use and nonresidential zones that permit multifamily uses if specified requirements are met
- Processing applications to develop transitional and supportive housing by right in multifamily and mixed-use zones in accordance with timeframes specified by State law
- Permitting farmworker employee housing as a use in accordance with the California Employee Housing Act
- Adding direct language about reasonable accommodation procedures for persons with disabilities

Currently, the City of National City offers several services aimed at addressing fair housing issues. The City contracts with CSA San Diego to provide fair housing services. The Housing Authority also administers a First-Time Homebuyer Program and provides downpayment assistance to low-income households. The Housing Authority also administers Tenant-Based Rental Assistance (TBRA) to provide rental assistance to homeless or housing insecure and

families experiencing domestic violence. The City of National City website has information on these and other housing-related programs. The website includes a translation feature to display information in Spanish. In addition to continuing existing programs and services, this Housing Element recommends implementing the actions identified in the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice, such as implementing zoning code revisions consistent with State law to increase housing options.

Key Issues: Additional Concerns

Through this analysis, additional fair housing issues that supplement those identified in the 2020 AI were identified. These issues are summarized below:

- There are disparities between the western and eastern portions of National City with regards to wealth, familial status, and access to opportunity. Compared to the eastern portion of the city, the western portion has lower median household incomes, higher concentrations of low- to moderate-income households, higher concentrations of Section 8 voucher users, higher concentrations of households in poverty, higher concentrations of single female-headed households with children, and lower TCAC opportunity area composite scores.
- Some census tracts in the northeastern portion of the city may have indicators of potential displacement. These tracts have experienced higher changes in median gross rents, lower changes in median household income, and sustained higher percentages of renter burdened households.
- A large percentage of National City households experience at least one housing problem, as defined by HUD. One category of housing problems is housing units with physical defects. Since the majority of homes in National City are at least 42 years old and city staff has observed that many documented housing issues are with older homes, the physical condition of housing units is a fair housing issue.

To help facilitate neighborhood enhancement and increase opportunities related to housing and living in National City, the city has allocated HOME and CDBG funds to strategic projects. These projects include:

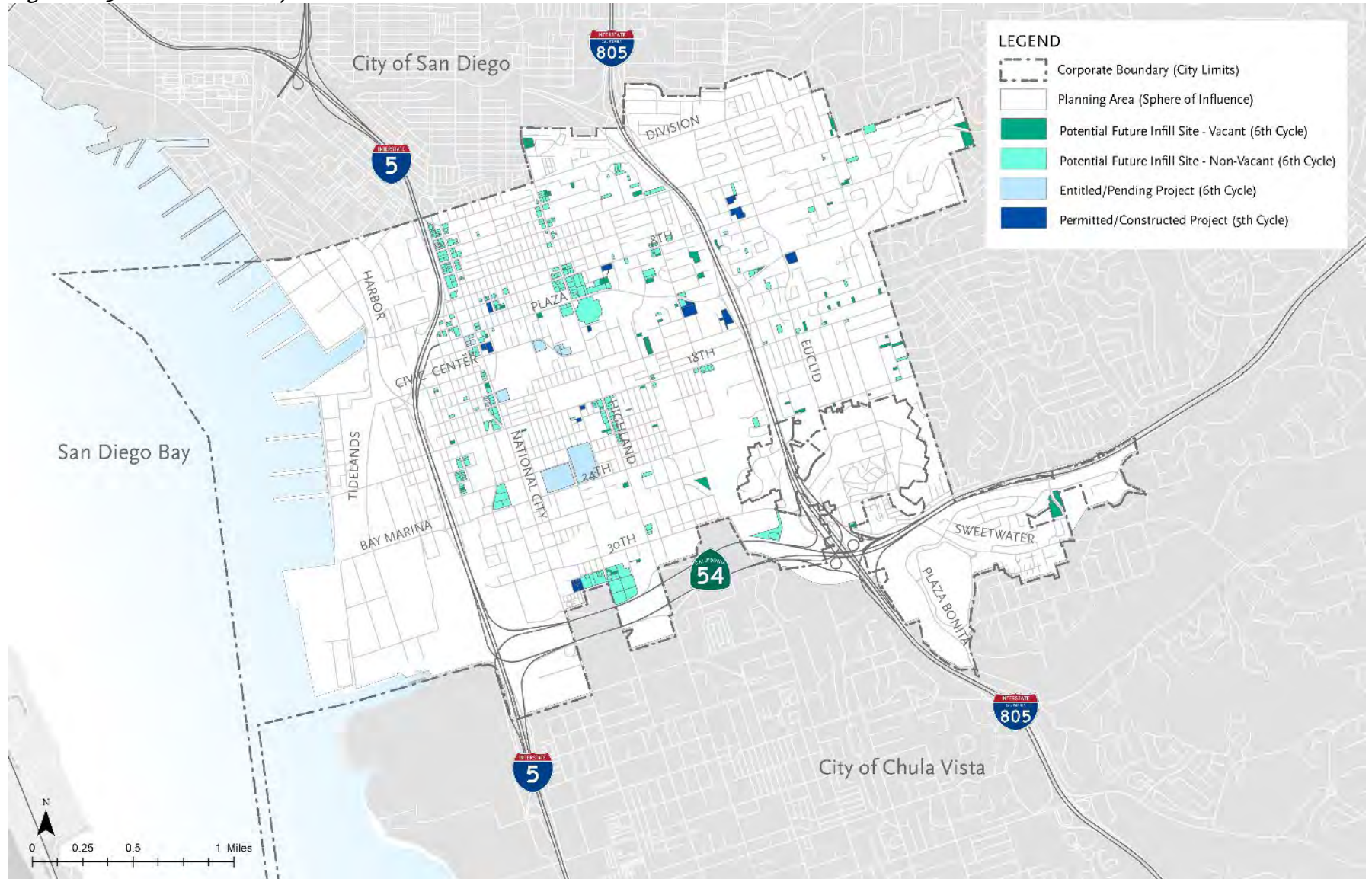
- Casa de Salud Youth Afterschool Program
- Literacy Services Program
- NCPD Support Service: Domestic Violence Response Team
- Housing Inspection Program
- Fire Station 34 Section
- Loan Payment
- Fair Housing and Tenant-Landlord Education
- Tenant Based Rental Assistance Program
- San Diego Habitat for Humanity Homeownership Project at 405-419 W. 18th St., National City

The city also continues to implement its First Time Homebuyer program and Community Housing Development Organizations program.

SITES INVENTORY

National City is a significantly urbanized area and is largely built-out. It has a limited supply of vacant, developable land; a majority of National City's RHNA allocation units are accommodated through underutilized, non-vacant sites. Figure A- 38 shows a map of the sites inventory that accommodates National City's 5,437 allocated units. While the units are located throughout the city, a majority are located within the Downtown Specific Plan and Mixed-Use Districts and Corridors; these areas have been most recently rezoned to encourage residential development in higher densities. These areas also have the greatest access to transit amenities. The location of the sites in the sites inventory is strategic and purposefully does not concentrate sites in areas with disproportionate segregation, poverty, or housing needs in ways that would exacerbate existing conditions. Rather, the location of sites aims to assist areas with disproportionate segregation, poverty, and housing needs in addressing these challenges, meeting community needs, and levelling the playing field.

Figure A- 38: Sites Inventory



Integration and Segregation

While all of National City has a high percentage of Hispanic residents, areas with the highest concentrations of Hispanic residents are to the north and the south. The sites inventory does not concentrate sites in these areas and instead distributes them largely throughout most of the western portion. Similarly, while much of National City has a high percentage of lower income households, census tracts in the western portion of the city have higher concentrations of lower income households. Per National City's RHNA allocation, the sites inventory accommodates a significant number of moderate- and above moderate-income units in the western portion of the city so as to prevent exacerbating the concentrations of lower income households.

Racially and Ethnically Concentrated Areas of Poverty and Affluence

The HUD R/ECAP maps do not identify any racially or ethnically concentrated areas of poverty in National City. The analysis conducted for this Housing Element concluded that there are no racially or ethnically concentrated areas of affluence in the city.

Access to Opportunity

The majority of National City is considered Low Resource according to the TCAC Opportunity Map composite score. Thus, while the majority of sites identified in the sites inventory are located in Low Resource areas, they are not disproportionately located in these areas in the context of the resource level of the city as a whole. However, the western portion of the city has a robust public transit network and is more accessible than the eastern portion. Households in the western area of the city have better access to jobs and key destinations through transit than those in the eastern portion. The majority of sites were strategically located in the western portion of the city to take advantage of the current and future transportation assets in this area.

Disproportionate Housing Needs

National City has a high concentration of households who have housing cost burden. Site selection emphasized infill and redevelopment along mixed-used corridors in the city to leverage existing zoned capacity, as well as to encourage residential development along corridors with access to transit and a walking and rolling friendly environment. Special consideration was given to the siting of lower-income sites to ensure their geographic distribution throughout the city while also providing access to supportive amenities such as education facilities and transit. Housing in mixed-use corridors with higher density allowances often has a higher chance of facilitating more affordable units and has strong potential for mixed-income development. Both of these types of housing are in line with National City's RHNA allocation distribution.

IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

Through this analysis, several items have been identified as contributing factors that affect fair housing in National City.

Limited access to a variety and type of affordable housing options

Median household incomes in National City have stayed relatively stagnant in recent years, while median gross rent prices have increased during the same time period. Many National City residents are now housing cost burdened, and this discrepancy in the rates of household income and rent increases causes risk of displacement. National City is undergoing a comprehensive municipal code update that will ensure the municipal code is compliant with recently-passed state housing legislation aimed at facilitating housing affordability. This update involves an Accessory Dwelling Unit ordinance, updates to the density bonus program, the inclusion of no net loss requirements, and other housing affordability actions.

Contributing factors:

- Housing is increasingly unaffordable to many National City residents.
- Median incomes are stagnant and rents continue to rise.
- A high percentage of National City residents are renters.
- National City has the highest percentage of very low-income and second highest percentage of low-income households in the county.

Disproportionately high amount of Section 8 voucher use

The 2020 AI found that National City has an overconcentration of Section 8 voucher recipients. Within the city, Section 8 voucher use is concentrated to the west. National City has a higher proportion of low-income residents and community members living in poverty compared to the rest of the San Diego region.

Contributing factors:

- Over-concentration of Section 8 within the city as compared to the San Diego region, particularly on the western side of the city (west of I-805).
- High number of cost burdened households

Poor building and infrastructure quality throughout the city

National City has identified a need for infrastructure improvement throughout the city. Infrastructure refers to both public facilities and amenities and the housing stock. Much of the housing stock is older and is in need of repair and many sidewalks and crosswalks in the western portion of the city are missing or damaged. National City is conducting an update of its Transportation Element as well as its Bicycle Master Plan. These guiding documents include significant improvements to and expansion of the bicycle network, improvements to sidewalks, crosswalks, and highway underpasses, and traffic calming enhancements.

Contributing factors:

- Substandard housing conditions, older housing stock, and high costs of repairs and rehabilitation.
- Poor active transportation infrastructure, such as sidewalks and crosswalks, in predominantly lower-income areas of the city.

Lending Discrimination

National City has a higher percentage of renters than homeowners; this discrepancy is higher than that of San Diego County. While residents and city staff alike have expressed a desire to increase the amount of homeownership in the city, homeownership rates have not been increasing as fast as ideal.

Contributing factors:

- National City has the highest rates of withdrawn/closed applications and lowest home loan approval rates (under 65%) in San Diego County.
- National City has a higher percentage of renters versus owners when compared to the County.
- Insufficient understanding of the homebuying and lending process, credit history and high downpayment.
- Roughly 28% of residents speak English less than “very well” and may face discrimination based on national origin.
- Lack of community awareness of fair housing resources.

Limited physical access to housing options and public infrastructure for persons with disabilities

National City has a slightly higher percentage of residents with a disability than San Diego County, but housing and public infrastructure is not always accessible to them. This analysis found that National City has a higher number of seniors, and residents in this age group are more likely to have a physical disability. The city has several senior living facilities, and while that housing may be accessible to seniors with physical disabilities, the surrounding public infrastructure may not be accessible to them, and the general housing stock and other public facilities may not be accessible to everyone with varying types of disabilities. One way to increase the accessibility of housing and infrastructure is to site housing close to services and transit. The sites inventory locates a majority of the housing sites in mixed-use areas with higher zoned densities, which are generally close to transit, have services, and have multifamily housing subject to ADA compliance.

Contributing factors:

- Inaccessible sidewalks, pedestrian crossings or other infrastructure.
- Older housing stock can create barriers for people with disabilities who need home modifications or other improvements.

PRIORITIES, GOALS, AND ACTIONS

Based on this analysis, the following table summarizes each fair housing issue, contributing factors, and actions for National City to integrate into its 6th Cycle Housing Element:

Table A- 11: Fair Housing Issues and Recommended Actions

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
1. Disproportionately high amount of Section 8 voucher use	<p>Over-concentration of Section 8 within the city as compared to the San Diego region, particularly on the western side of the City (west of I-805).</p> <p>High number of cost burdened households.</p>	<p>a. Outreach to landlords bi-annually to expand the location of participating voucher properties so voucher use is not concentrated in western part of the City. This outreach will focus on promoting the Section 8 voucher program to landlords who have not previously participated in the program and encourage involvement from those landlords who own units in multi-family buildings with residents with a variety of income levels, those who own single-family units, and those who own ADUs.</p> <p>b. Provide housing counseling through local and/or regional organizations.</p>
2. Poor building and public infrastructure quality	<p>Poor infrastructure quality in predominantly lower-income areas of the city</p> <p>Substandard housing conditions, older housing stock, and high costs of repairs and rehabilitation.</p> <p>Poor active transportation infrastructure, such as sidewalks and crosswalks, in</p>	<p>a. Dedicate or seek funding to prioritize infrastructure improvements in disadvantaged communities.</p> <p>b. Designate Transit-Priority Areas (TPAs) within ½ mile of major transit stops and transit-oriented development opportunities to target public investment in affordable housing, active transportation and mixed-</p>

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
	predominantly low-income areas of the city.	<p>use development. Complete within the first two years of the 8-year planning period.</p> <p>c. Develop a proactive code enforcement program that targets areas of concentrated rehabilitation needs, results in repairs and mitigates potential cost, displacement and relocation impacts on residents.</p> <p>d. Promote housing rehabilitation, specifically in the western portion of the city, through the establishment of a Home Repair Loan Program accessible to lower income residents.</p>
3. Limited access to a variety and type of affordable housing options	<p>Housing is increasingly unaffordable to many National City residents.</p> <p>Median incomes are stagnant and rents continue to rise.</p> <p>A high percentage of National City residents are renters.</p> <p>National City has the highest percentage of very low-income and second highest percentage of low-income households in the county.</p>	<p>a. Continue to partner with CSA San Diego and LASSD to provide multi-lingual tenant legal counseling.</p> <p>b. Develop a focused program to connect low-income residents with affordable homeownership and rental opportunities. For rental opportunities, prioritize mixed income properties and/or neighborhoods.</p> <p>c. Continue to provide Tenant-Based Rental Assistance (TRBA) to housing insecure, persons experiencing homelessness and families experiencing domestic violence.</p>

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
		<p>d. Ensure compliance with state law to facilitate affordable housing (ADUs) and housing for homeless and special needs individuals.</p> <p>e. Within first two years of the 8-year planning period, update the municipal code to require that applicants demonstrate there will be no net loss of housing units as a result of proposed projects.</p>
4. Lending Discrimination	<p>National City has the highest rates of withdrawn/closed applications and lowest home loan approval rates (under 65%) in San Diego County.</p> <p>National City has a higher percentage of renters versus owners when compared to the County.</p> <p>Insufficient understanding of the homebuying and lending process, credit history and high downpayment.</p> <p>Roughly 28% of residents speak English less than “very well” and may face discrimination based on national origin.</p> <p>Lack of community awareness of fair housing resources.</p>	<p>a. Work with LASSD, CSA and the County to conduct testing for discrimination every 5 years.</p> <p>b. Host two multi-lingual outreach and engagement events a year to provide education to residents regarding residential development, tenant and homeowner rights and requirements, resources available to residents experiencing hardship or who are looking for guidance, wealth building through asset acquisition and management, and home purchasing and renovation/rehabilitation guidance. Partner with community-based organizations.</p> <p>c. Pursue partnerships with non-profit organizations and</p>

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
		<p>financial institutions to provide asset counseling, financial literacy, and investing strategies for lower-income households.</p> <p>d. Establish a Community Land Trust program to preserve the long-term availability of land for affordable housing using the San Diego Community Land Trust model or similar program.</p> <p>e. Continue and seek opportunities to expand the City's First Time Homebuyer Program, which provides downpayment assistance to low-income households. Assist an average of 2 households per year for a total of 16 households during the 8-year planning period.</p>
<p>5. Limited physical access to housing options and public infrastructure for persons with disabilities</p>	<p>Inaccessible housing and public infrastructure</p> <p>Inaccessible sidewalks, pedestrian crossings or other infrastructure.</p> <p>Older housing stock can create barriers for people with disabilities who need home modifications or other improvements.</p>	<p>a. Dedicate or seek funding to prioritize ADA-compliant infrastructure improvements as identified in the updated Transportation Element and Bicycle Master Plan.</p> <p>b. Conduct developer outreach twice per year to encourage development on mixed-use sites within TPAs and discuss barriers to and opportunities for ADA-compliant development. Promote the use of the State Density Bonus and Complete Communities</p>

AFH Identified Fair Housing Issue	Contributing Factors	City Actions
		Incentive Program to encourage mixed-income housing.

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APPENDIX B: REVIEW AUTHORITY AND ALLOWED USE TABLES

Application Type	Role of Review Authority		
	Planning Division	Planning Commission	City Council
Ministerial Applications			
Interpretations (See Section 18.10.050 (C))	Decision	Appeal	Appeal
Minor site plan review	Decision	Appeal	Appeal
Minor use permit	Decision	Appeal	Appeal
Home occupation permit	Decision	Appeal	Appeal
Sign permit	Decision	Appeal	Appeal
Discretionary Applications			
Conditional use permit	Recommend	Decision	Appeal
Variance	Recommend	Decision	Appeal
Planned development permit	Recommend	Decision	Appeal
General plan amendment	Recommend	Recommend	Decision
Zoning ordinance amendment	Recommend	Recommend	Decision
Zoning map amendment	Recommend	Recommend	Decision

Land Use	Permit Required By District						Specific Use Regulations
	RS-1	RS-2	RS-3	RM-1	RM-2	RM-3	
Accessory structure (incidental to primary use and not a second unit)	P	P	P	P	P	P	
Animal husbandry	C	—	—	—	—	—	Section 8.32
Bed and breakfast inn (B&B)	C	C	C	C	C	C	Section 18.30.290
Family day care home, small	P	P	P	P	P	P	Section 18.30.080
Family day care home, large	P	P	P	P	P	P	Section 18.30.080
Convalescent services/hospice (in home care only)	P	P	P	P	P	P	
Dormitory (Accessory to a school)	—	—	—	—	C	C	
Dwelling unit, single detached	P	P	P	P	P	P	
Dwelling unit, single attached	—	—	P	P	P	P	
Dwelling unit, multiple	—	—	P	P	P	P	
Home occupation (accessory use)	P	P	P	P	P	P	Section 18.12.090
Neighborhood corner store	M	M	M	M	M	M	Section 18.30.260

TABLE 18.21.020 ALLOWED LAND USES - RESIDENTIAL ZONES

Land Use	Permit Required By District						Specific Use Regulations
	RS-1	RS-2	RS-3	RM-1	RM-2	RM-3	
Open space reserves	P	P	P	P	P	P	
Parks, passive recreation	P	P	P	P	P	P	
Parks, active recreation	C	C	C	P	P	P	
Plant nursery	C	—	—	—	—	—	
Public assembly	C	C	C	C	C	C	
Public safety facility	C	C	C	C	C	C	
Rectory (accessory to religious facility)	C	C	C	C	C	C	
Renewable energy infrastructure (accessory)	P	P	P	P	P	P	Section 18.30.210/18.30.300; California Building Code
Rooming or boarding house (accessory)	C	C	C	C	C	C	
Second unit (accessory)	P	P	P	P	P	P	
Transitional / supportive housing	P	P	P	P	P	P	
Utility facilities, minor	P	P	P	P	P	P	
Utility facilities, major	C	C	C	C	C	C	

TABLE 18.21.020 ALLOWED LAND USES - RESIDENTIAL ZONES

Land Use	Permit Required By District						Specific Use Regulations
	RS-1	RS-2	RS-3	RM-1	RM-2	RM-3	
Urban agriculture	P	P	P	P	P	P	Section 18.30.240
<p>P Permitted</p> <p>C Conditional use permit</p> <p>M Minor use permit (ministerial)</p> <p>— Not permitted</p>							

TABLE 18.22.020 ALLOWED LAND USES - COMMERCIAL ZONES

Land Use	Zone		Specific Use Regulations
	CA	CS	
Auto towing dispatch (accessory to service station)		P	
Alcohol, sales for off-site consumption (accessory to retail sales)		C	Section 18.30.050
Alcohol, sales for on-site consumption (accessory to eating place)		C	Section 18.30.050
Car wash, automatic and full service		P	
Car wash, manual		C	
Civic, fraternal, community, and cultural facilities		C	
Commercial recreation, indoor		C	
Commercial recreation, outdoor		C	

TABLE 18.22.020 ALLOWED LAND USES - COMMERCIAL ZONES

Land Use	Zone		Specific Use Regulations
	CA	CS	
Convenience store (accessory to service station)		M	Section 18.30.190
Eating place, dine-in (accessory)		P	
Eating place, dine-in		P	
Eating place, drive-thru/take-out		C	
Games of skill or amusement, maximum of four machines (accessory)		P	
Gasoline service station		C	Section 18.30.190
Goods and services, retail		P	
New automobile and truck sales, leasing, and rentals	P		
Offices		P	

TABLE 18.22.020 ALLOWED LAND USES - COMMERCIAL ZONES

Land Use	Zone		Specific Use Regulations
	CA	CS	
Off-street parking and loading facilities (accessory)		P	
Open space reserves		P	
Parking garage		P	
Pawn shops		C	Section 18.30.330
Payday lenders		C	Section 18.30.320
Public assembly		C	
Public safety facilities		P	
Research and development		P	
Recycling facility, small (accessory)		P	Section 18.30.170
Recycling facility, mobile		C	Section 18.30.170

Land Use	Zone		Specific Use Regulations
	CA	CS	
Renewable energy infrastructure (accessory)		P	Section 18.30.210/ 18.30.300; CBC
Sale of vehicle parts and accessories when provided by new vehicle dealership on contiguous property	P		
Sale or rental of campers, camper trailers, vacation trailers, self-propelled mobile homes, boats, and other sporting and pleasure equipment which is substantial in size. This activity must be incidental to the principal activity of the automobile and/or truck dealership	P		

Land Use	Zone		Specific Use Regulations
	CA	CS	
Service and repair of trucks and automobiles when provided by new vehicle dealer on contiguous property	P		
Storage building (accessory)		P	
Tattoo parlors and body piercing establishments		C	Section 18.30.310
Telecommunications facilities		C	Section 18.30.220
Used auto and truck sales when part of a new vehicle dealership and located on contiguous land	P		
Utility facilities, minor		P	
Utility facilities, major		C	

Land Use	Zone		Specific Use Regulations
	CA	CS	
Vehicle body and paint shop		C	Section 18.30.060
Vehicle, outdoor storage (a)		C	Section 18.30.160
Vehicle parts and accessories sales		P	
Vehicle, repair or service (minimum 7,500 square foot lot)		P	
Vending machines (accessory)		P	Section 18.30.150(E)
Warehouse and distribution facility		P	
Wrecked vehicle storage, maximum 60 days (accessory)		P	
P Permitted C Conditional use permit M Minor use permit — Not permitted			

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Alcohol, sales for off-site consumption (accessory to retail sales)	C	C	C	C	Section 18.30.050
Alcohol, sales for on-site consumption (accessory to eating places)	C	C	C	C	Section 18.30.050
Animal boarding/kennel, small (setback 150 feet from single-family residential zones)	C	C	C	C	
Adult day health care	C	C	C	C	
Bar/nightclub	C	C	C	C	Section 18.30.050
Bed and breakfast inn (B&B)	C	C	C	C	
Breweries, small	P	P	P	P	
Brewery tasting room	P	P	P	P	Section 18.30.050/ City Council Policy 707

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Car wash, automatic and full service	P	P	P	P	
Car wash, manual	C	C	C	C	
Civic, fraternal, community, and cultural facilities	P	P	P	P	
Commercial recreation, indoor	P	P	P	P	
Commercial recreation, outdoor	M	M	M	M	
Convalescent / nursing home / hospice	P	P	P	P	
Child day care center	M	M	M	M	Section 18.30.070
Family day care home, small (accessory)	P	P	P	P	Section 18.30.080
Family day care home, large (accessory)	M	M	M	M	Section 18.30.080
Convenience store (accessory to gas service station)	P	P	P	P	Section 18.30.190

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Dormitory (accessory to school)	C	C	C	C	
Dwelling unit, single detached (b)	P	P	P	P	
Dwelling unit, single attached (b)	P	P	P	P	
Dwelling unit, multiple (b)	P	P	P	P	
Eating places, dine in	P	P	P	P	
Eating places, drive-through/take-out	C	C	C	C	
Farmer's market	C	C	C	C	
Gasoline service station	C	C	C	C	Section 18.30.190
Goods and services, retail	P	P	P	P	
Guidance/social assistance services	C	C	C	C	
Heliport/helistop (accessory)	—	—	C	C	

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Home occupation (accessory)	P	P	P	P	
Hospital	—	—	C	C	
Hotel, motel, and related services	P	P	P	P	Section 18.30.270
Maintenance yards	C	C	C	C	
Medical offices/clinics and laboratories	P	P	P	P	
Offices	P	P	P	P	
Open space reserves	P	P	P	P	
Parking garage	P	P	P	P	
Parks (passive and active recreation)	P	P	P	P	
Pawn shops	C	C	C	C	Section 18.30.330
Payday lenders	C	C	C	C	Section 18.30.320

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Private/public educational institutions, schools	C	C	C	C	
Public assembly	C	C	C	C	
Public safety facilities	P	P	P	P	
Rectory (accessory to religious facility)	P	P	P	P	
Recycling facility, small (accessory)	P	P	P	P	Section 18.30.170
Recycling facility, mobile	C	C	C	C	Section 18.30.170
Renewable energy infrastructure (accessory)	P	P	P	P	Section 18.30.210/18.30.300; California Building Code
Sidewalk café (accessory)	P	P	P	P	Section 18.30.200
Storage building (accessory)	P	P	P	P	

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
Tattoo parlors and body piercing establishments	C	C	C	C	Section 18.30.310
Telecommunication facilities, commercial	C	C	C	C	Section 18.30.220
Tobacco specialty businesses	—	—	C	C	Section 18.30.230
Transitional/supportive housing (b)	P	P	P	P	
Urban agriculture	P	P	P	P	Section 18.30.240
Utility facilities, minor	P	P	P	P	
Utility facilities, major	C	C	C	C	
Vending machines (accessory)	P	P	P	P	Section 18.30.150(E)
Veterinary clinics/hospitals	C	C	C	C	Section 18.30.250
Winery tasting room	P	P	P	P	Section 18.30.050/ City Council Policy 707

TABLE 18.24.050 ALLOWED LAND USES - MIXED USE ZONES

Land Use	Permit Required by Zone				Specific Use Regulations
	MXC-1 (a)	MXC-2	MXD-1	MXD-2	
P Permitted C Conditional use permit M Minor use permit (ministerial) — Not permitted					

TABLE 18.25.020 ALLOWED LAND USES - INDUSTRIAL ZONES

Land Use	Zone			Specific Use Regulations
	IL	IM	IH	
Animal boarding/kennel, small	C	C	C	
Assembly and light manufacturing/processing	P	P	P	
Automotive impound and storage yards	C	C	C	Section 18.30.040
Auto towing dispatch (accessory to service station)	P	P	—	
Breweries, small	P	P	P	
Breweries, large	C	C	C	
Brewery tasting room	P	P	P	Section 18.30.050/ City Council Policy 707
Building supplies and equipment, sales and rental	P	P	P	
Cemetery/mausoleum/crematory	—	C	C	
Commercial recreation, indoor	C	—	—	
Eating places, dine-in (accessory)	P	P	P	
Emergency shelter	P	—	—	Section 18.30.110
Gasoline service station	C	C	—	Section 18.30.190

TABLE 18.25.020 ALLOWED LAND USES - INDUSTRIAL ZONES

Land Use	Zone			Specific Use Regulations
	IL	IM	IH	
Goods and services, retail sales (accessory)	P	P	P	
Heavy manufacturing/processing	—	—	C	
Industrial equipment/machinery, sales and rentals	P	P	P	
Medium manufacturing/processing	—	P	P	
Offices (accessory)	P	P	P	
Offices	P	M	M	
Open space reserves	P	P	P	
Outdoor storage	C	C	C	Section 18.30.160
Pawn shops	C	—	—	Section 18.30.330
Payday lenders	C	—	—	Section 18.30.320
Plant nursery	P	P	C	
Parking, structure/ fleet	P	P	P	
Personal storage facilities (mini-warehouses)	P	P	—	
Public assembly	C	—	—	
Public safety facilities	P	P	P	

TABLE 18.25.020 ALLOWED LAND USES - INDUSTRIAL ZONES

Land Use	Zone			Specific Use Regulations
	IL	IM	IH	
Recycling facilities, small (accessory)	P	P	—	Section 18.30.170
Recycling facilities, mobile	C	C	—	Section 18.30.170
Renewable energy infrastructure (accessory)	P	P	P	Section 18.30.210/ 18.30.300; California Building Code
Renewable energy infrastructure	P	P	P	Section 18.30.210/ 18.30.300; California Building Code
Research and development	P	P	P	
Scrap metal processing	—	—	C	Section 18.30.180
Sixty-day storage of wrecked vehicles	P	P	P	
Storage facility, self (mini-warehouses)	P	P	P	
Tattoo parlors and body piercing establishments	C	—	—	Section 18.30.310
Telecommunication facilities, commercial	C	C	C	Section 18.30.220
Trade schools	P	C	C	

TABLE 18.25.020 ALLOWED LAND USES - INDUSTRIAL ZONES

Land Use	Zone			Specific Use Regulations
	IL	IM	IH	
Trucking and transportation terminal	—	C	P	
Urban agriculture	C	—	—	Section 18.30.240
Utility facilities, minor	P	P	P	
Utility facilities, major	P	P	P	
Veterinary hospitals and clinics	M	M	—	Section 18.30.250
Waterfront related industries	P	P	P	
Wholesaling, warehousing, and distribution	P	P	P	
Winery	C	C	C	
Winery tasting room	P	P	P	Section 18.30.050/ City Council Policy 707
P Permitted C Conditional use permit M Minor use permit (ministerial) — Not permitted				

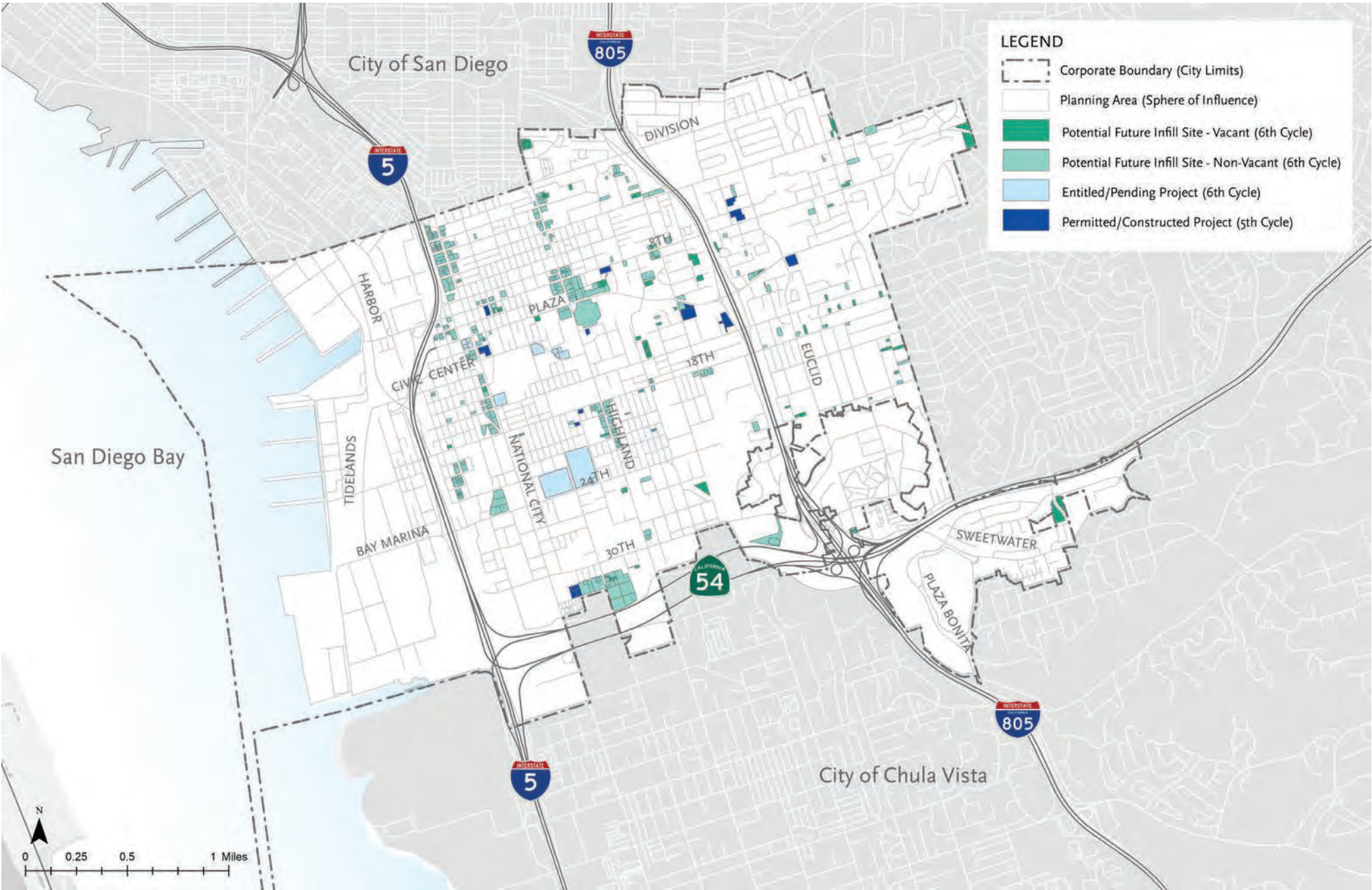
Land Use	Permit Required	Specific Use Regulations
Animal husbandry	P	Section 8.32
Caretaker's residence (accessory)	M	
Cemetery/mausoleum	P	
Child day care center	P	Section 18.30.070
Civic, fraternal, community, and cultural facilities	P	
Commercial recreation, indoor (accessory)	P	
Convalescent/nursing home/hospice	P	
Detention facility	C	
Dormitory (accessory to school)	C	
Farmers' markets	C	
Fraternity or sorority house	C	
Government offices	P	
Guidance/social assistance services	P	
Heliport/helistop (accessory to hospital)	C	
Hospital	P	
Maintenance buildings/yards	C	
Medical offices/clinics and laboratories	P	

Land Use	Permit Required	Specific Use Regulations
Military installations	P	
Open space reserves	P	
Parking, structure/fleet	P	
Parks (passive and active recreation)	P	
Private/public educational institutions, schools	P	
Public assembly	C	
Public safety facilities	P	
Public utilities, minor	P	
Public utilities, major	C	
Renewable energy infrastructure (accessory)	P	Section 18.30.210/18.30.300; California Building Code
Storage yards and buildings (accessory)	P	Section 18.30.160
Telecommunication facilities, commercial	C	Section 18.30.220
Urban agriculture	P	Section 18.30.240
P Permitted C Conditional use permit M Minor use permit (ministerial) — Not permitted		

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APPENDIX C: SITE INVENTORY MAP

SITE INVENTORY MAP



APPENDIX D: SITE INVENTORY TABLE AND PHOTOS

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
315 HIGHLAND AVE N	5514701900	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.14	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	4	0	0	4	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Housing Authority-owned site.
311 HIGHLAND AVE N	5514701800	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.15	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	5	0	0	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Housing Authority-owned site.
EPSILON ST & S 43RD ST	5514704800	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.22	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	7	0	0	7	Low Improved Building Value, Development Potential Over 25%	Housing Authority-owned site.
307 HIGHLAND AVE N	5514701700	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.30	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	9	0	0	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Housing Authority-owned site.
249 HIGHLAND AVE N	5514701500	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.34	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	11	0	0	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Housing Authority-owned site.
217 HIGHLAND AVE N	5514704300	AA	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.34	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	11	0	0	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Housing Authority-owned site.
254 31ST ST E	5622521400	AB	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.73	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	22	22	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
170 31ST ST E	5622521300	AB	Mixed-Use Transit Corridor - Minor	MXC-1	48	1.51	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	46	46	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
250 31ST ST E	5622520200	AB	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.24	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
3103 D AVE	5622801600	AD	Mixed-Use Transit Corridor - Major	MXD-2	75	0.67	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	33	33	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
E 31ST ST & D AVE	5622804400	AD	Mixed-Use Transit Corridor - Major	MXD-2	75	0.53	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	26	26	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
E 31ST ST & D AVE	5622802200	AD	Mixed-Use Transit Corridor - Major	MXD-2	75	0.22	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	11	11	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
3145 D AVE	5622802900	AD	Mixed-Use Transit Corridor - Major	MXD-2	75	0.28	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	Low Improved Building Value, Aged Structure, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
E 31ST ST & D AVE	5622803100	AD	Mixed-Use Transit Corridor - Major	MXD-2	75	0.33	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	16	16	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
E 9TH ST & B AVE	5564731700	AG	Downtown Specific Plan	10	80	0.19	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
200 8TH ST E	5564731500	AG	Downtown Specific Plan	9	150	0.33	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	40	40	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
705 8TH ST E	5563541500	AH	Mixed-Use Transit Corridor - Major	MXC-2	75	0.10	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
731 G AVE	5563541400	AH	Mixed-Use Transit Corridor - Major	MXC-2	75	0.10	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Development Potential Over 25%	Consolidation Based on Ownership
E 8TH & G AVE	5563541700	AH	Mixed-Use Transit Corridor - Major	MXC-2	75	0.11	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
717 8TH ST E	5563541600	AH	Mixed-Use Transit Corridor - Major	MXC-2	75	0.18	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
831 8TH ST E	5564140900	AI	Mixed-Use Transit Corridor - Major	MXC-2	75	0.17	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
843 8TH ST E	5564140800	AI	Mixed-Use Transit Corridor - Major	MXC-2	75	0.23	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
720 I AVE	5564140500	AJ	Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Single Family Multiple-Units, 3	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
704 I AVE	5564140400	AJ	Mixed-Use Transit Corridor - Major	MXC-2	75	0.18	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
705 HIGHLAND AVE	5564141100	AJ	Mixed-Use Transit Corridor - Major	MXC-2	75	0.29	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
840 HIGHLAND AVE	5564921600	AK	Mixed-Use Transit Corridor - Major	MXC-2	75	0.23	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
E 8TH ST & HIGHLAND AVE	5564921100	AK	Mixed-Use Transit Corridor - Major	MXC-2	75	0.41	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	20	20	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
722 8TH ST E	5564921300	AL	Mixed-Use Transit Corridor - Major	MXC-2	75	0.11	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
718 8TH ST E	5564921200	AL	Mixed-Use Transit Corridor - Major	MXC-2	75	0.11	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
916 8TH ST E	5565101200	AM	Mixed-Use Transit Corridor - Major	MXC-2	75	0.67	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	32	0	0	32	Development Potential Over 25%	Consolidation Based on Ownership
914 8TH ST E	5565103100	AM	Mixed-Use Transit Corridor - Major	MXC-2	75	1.13	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	54	0	0	54	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
1821 PALM AVE	5613604500	AN	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.13	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
E 18TH ST & PALM AVE	5613604900	AN	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.21	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1624 18TH ST E	5613604800	AN	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.28	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
1602 18TH ST E	5613604600	AN	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.29	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1612 18TH ST E	5613604700	AN	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.30	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
2915 HIGHLAND AVE	5631211200	AO	Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
2903 HIGHLAND AVE	5631210900	AO	Mixed-Use Transit Corridor - Major	MXC-2	75	0.18	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
E 19TH ST & HIGHLAND AVE	5602400500	AP	Mixed-Use Transit Corridor - Major	MXC-2	75	0.07	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1840 HIGHLAND AVE	5602400600	AP	Mixed-Use Transit Corridor - Major	MXC-2	75	0.11	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
200 HIGHLAND AVE	5561260300	AQ	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.28	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	9	0	9	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
228 HIGHLAND AVE	5561260400	AQ	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.43	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	14	0	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
321 HIGHLAND AVE	5561801700	AR	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.21	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
309 HIGHLAND AVE	5561801800	AR	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.24	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
419 HIGHLAND AVE	5563112300	AT	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
439 HIGHLAND AVE	5563112100	AT	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.09	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
423 HIGHLAND AVE	5563112200	AT	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.11	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
3404 VALLEY RD	5643100300	AU	Low-Medium Density Residential	RS-2	9	2.20	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	11	0	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	City-owned site.
3402 VALLEY RD	5642907100	AU	Low-Medium Density Residential	RS-2	9	0.71	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	4	0	4	Low Improved Building Value, Development Potential Over 25%	City-owned site.
VALLEY RD & PLAZA BONITA	5642907500	AU	Low-Medium Density Residential	RS-2	9	0.20	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	1	0	1	Low Improved Building Value, Development Potential Over 25%	City-owned site.
VALLEY RD & PLAZA BONITA	5642907400	AU	Low-Medium Density Residential	RS-2	9	0.22	Vacant	Yes - Current	YES - City-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	1	0	1	Low Improved Building Value, Development Potential Over 25%	City-owned site.
1830 SWEETWATER RD	5632312600	AV	Mixed-Use Transit Corridor - Major	MXD-2	75	0.98	Community Shopping Center	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	48	0	0	48	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
SWEETWATER RD & EUCLID A	5632312500	AV	Mixed-Use Transit Corridor - Major	MXD-2	75	3.06	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	149	0	0	149	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
E 12TH ST & PLAZA BLVD	5573807000	AW	Mixed-Use Transit Corridor - Major	MXD-2	75	0.07	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	4	0	4	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
E 12TH ST & PLAZA BLVD	5573801202	AW	Mixed-Use Transit Corridor - Major	MXD-2	75	0.12	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
2228 12TH ST E	5573801100	AW	Mixed-Use Transit Corridor - Major	MXD-2	75	0.20	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	INTRACConnect Site
2224 12TH ST E	5573801000	AW	Mixed-Use Transit Corridor - Major	MXD-2	75	0.46	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	21	21	Low Improved Building Value, Aged Structure, Development Potential Over 25%	INTRACConnect Site
E 8TH ST & HARBISON AVE	5541800400	AX	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
E 8TH ST & RACHAEL AVE	5541800500	AX	Mixed-Use Transit Corridor - Minor	MXC-1	48	0.28	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
E 1ST ST & NATIONAL CITY BL	5550202800	C	Downtown Specific Plan	1A	185	0.01	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
E 1ST ST & NATIONAL CITY BL	5550200400	C	Downtown Specific Plan	1A	185	0.02	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	4	4	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
117 ROOSEVELT AVE	5550202500	C	Downtown Specific Plan	1A	185	0.04	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	5	5	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
119 ROOSEVELT AVE	5550202400	C	Downtown Specific Plan	1A	185	0.04	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
40 NATIONAL CITY BLVD	5550202700	C	Downtown Specific Plan	1A	185	0.05	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
10 NATIONAL CITY BLVD	5550202100	C	Downtown Specific Plan	1A	185	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
117 ROOSEVELT AVE	5550202200	C	Downtown Specific Plan	1A	185	0.07	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
119 ROOSEVELT AVE	5550202300	C	Downtown Specific Plan	1A	185	0.07	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
135 ROOSEVELT AVE	5550202600	C	Downtown Specific Plan	1A	185	0.12	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	17	17	Development Potential Over 25%	Consolidation Based on Ownership
123 ROOSEVELT AVE	5550200600	C	Downtown Specific Plan	1A	185	0.12	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
125 ROOSEVELT AVE	5550200700	C	Downtown Specific Plan	1A	185	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	21	21	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
103 NATIONAL CITY BLVD	5550200200	C	Downtown Specific Plan	1A	185	0.25	Multi-Family Residential, 7	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	29	29	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
21 3RD ST W	5550301200	E	Downtown Specific Plan	1A	185	0.05	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	8	8	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 2ND ST & NATIONAL CITY B	5550301100	E	Downtown Specific Plan	1A	185	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	10	10	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 2ND ST & NATIONAL CITY B	5550301300	E	Downtown Specific Plan	1A	185	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	10	10	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 2ND ST & NATIONAL CITY B	5550301000	E	Downtown Specific Plan	1A	185	0.08	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 2ND ST & NATIONAL CITY B	5550300900	E	Downtown Specific Plan	1A	185	0.08	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 2ND ST & NATIONAL CITY B	5550301400	E	Downtown Specific Plan	1A	185	0.09	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	13	13	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
214 NATIONAL CITY BLVD	5550300800	E	Downtown Specific Plan	1A	185	0.26	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	37	37	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
241 NATIONAL CITY BLVD E	5561011500	F	Downtown Specific Plan	2	115	0.58	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	53	53	Low Improved Building Value, Development Potential Over 25%	Opportunity Zone Listing, Development Interest, Consolidation Based on Ownership
35 3RD ST E	5561011600	F	Downtown Specific Plan	2	115	0.13	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Opportunity Zone Listing, Development Interest, Consolidation Based on Ownership
229 NATIONAL CITY BLVD	5561010200	F	Downtown Specific Plan	2	115	0.16	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Opportunity Zone Listing, Development Interest, Consolidation Based on Ownership
310 NATIONAL CITY BLVD	5550302200	G	Downtown Specific Plan	1A	185	0.57	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	85	0	85	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Development Interest, Consolidation Based on Ownership
340 NATIONAL CITY BLVD	5550302000	G	Downtown Specific Plan	1A	185	0.24	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	36	0	36	Aged Structure, Development Potential Over 25%	Development Interest, Consolidation Based on Ownership
ROOSEVELT AVE & W 4TH ST	5550301700	G	Downtown Specific Plan	1A	185	0.24	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	36	0	36	Low Improved Building Value, Development Potential Over 25%	Development Interest, Consolidation Based on Ownership
330 NATIONAL CITY BLVD	5550302100	G	Downtown Specific Plan	1A	185	0.39	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	57	0	57	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Development Interest, Consolidation Based on Ownership
404 NATIONAL CITY BLVD	5550410700	I	Downtown Specific Plan	1A	185	0.10	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	15	15	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
408 NATIONAL CITY BLVD	5550410800	I	Downtown Specific Plan	1A	185	0.11	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 5TH ST & ROOSEVELT AVE	5550410200	J	Downtown Specific Plan	1A	185	0.12	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
425 ROOSEVELT AVE	5550410300	J	Downtown Specific Plan	1A	185	0.12	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
W 5TH ST & ROOSEVELT AVE	5550410500	J	Downtown Specific Plan	1A	185	0.15	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	22	22	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 5TH ST & ROOSEVELT AVE	5550410600	J	Downtown Specific Plan	1A	185	0.15	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	23	23	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 5TH ST & ROOSEVELT AVE	5550410100	J	Downtown Specific Plan	1A	185	0.16	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	24	24	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
W 5TH ST & ROOSEVELT AVE	5550410400	J	Downtown Specific Plan	1A	185	0.18	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	25	25	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
526 NATIONAL CITY BLVD	5550421900	L	Downtown Specific Plan	1B	185	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	20	20	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
540 NATIONAL CITY BLVD	5550422000	L	Downtown Specific Plan	1B	185	0.42	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	62	62	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
515 NATIONAL CITY BLVD	5562120600	M	Downtown Specific Plan	3	115	0.06	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
517 NATIONAL CITY BLVD	5562120500	M	Downtown Specific Plan	3	115	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
515 NATIONAL AVE	5562120400	M	Downtown Specific Plan	3	115	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
PLAZA BLVD & PARADISE VAL	6690601700	N	Low-Medium Density Residential	RS-1	4	1.22	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
KENWELL ST & SANDY SHORE	6690601300	N	Low-Medium Density Residential	RS-1	4	0.76	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
PLAZA BLVD & PARADISE VAL	6690601000	N	Low-Medium Density Residential	RS-1	4	0.96	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
E 8TH & R AVE	5571203900	O	Mixed-Use Transit Corridor - Major	MXC-2	75	0.09	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	4	4	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1631 8TH ST E	5571121300	O	Mixed-Use Transit Corridor - Major	MXC-2	75	0.35	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
824 PALM AVE	5571801100	P	Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
E 8TH ST & PALM AVE	5571800900	P	Mixed-Use Transit Corridor - Major	MXC-2	75	0.46	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	21	21	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site, Consolidation Based on Ownership
1516 8TH ST E	5571800800	Q	Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
1508 8TH ST E	5571800700	Q	Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
121 PLAZA BLVD W	5550850600	S	Downtown Specific Plan	7	185	0.04	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
900 ROOSEVELT AVE	5550850700	S	Downtown Specific Plan	7	185	0.66	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	98	0	0	98	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
929 NATIONAL CITY BLVD	5564710400	T	Downtown Specific Plan	5B	115	0.07	Arterial Commercial	Yes - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	6	0	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	City-owned site.
921 NATIONAL CITY BLVD	5564710300	T	Downtown Specific Plan	5B	115	0.20	Arterial Commercial	Yes - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	18	0	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	City-owned site.
PLAZA BLVD & A AVE	5565531500	U	Downtown Specific Plan	5A	80	0.06	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
32 PLAZA BLVD W	5565531400	U	Downtown Specific Plan	5A	80	0.32	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	20	20	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
ROOSEVELT AVE & W 11TH ST	5551140400	V	Downtown Specific Plan	6	185	0.06	Parking Lot - Surface	Yes - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	Development Interest
ROOSEVELT AVE & W 11TH ST	5551140300	V	Downtown Specific Plan	6	185	0.06	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	Development Interest
NATIONAL CITY BLVD & W 11TH ST	5551141100	V	Downtown Specific Plan	6	185	0.08	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	Development Interest
ROOSEVELT AVE & W 11TH ST	5551140500	V	Downtown Specific Plan	6	185	0.12	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	18	18	Low Improved Building Value, Development Potential Over 25%	Development Interest
1112 NATIONAL CITY BLVD	5551141200	V	Downtown Specific Plan	6	185	0.33	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	47	47	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Development Interest
1326 NATIONAL CITY BLVD	5600140800	W	Downtown Specific Plan	12A	150	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
1316 NATIONAL AVE	5600140900	W	Downtown Specific Plan	12A	150	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	16	16	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
E 8TH ST & PALM AVE	5571022800	X	Mixed-Use Transit Corridor - Major	MXC-2	75	0.11	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1419 8TH ST	5571020800	X	Mixed-Use Transit Corridor - Major	MXC-2	75	0.12	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	Consolidation Based on Ownership
1504 NATIONAL CITY BLVD	5600640900	Z	Downtown Specific Plan	12A	150	0.19	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	23	0	23	Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
1504 NATIONAL CITY BLVD	5600640800	Z	Downtown Specific Plan	12A	150	0.20	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	25	0	25	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
206 9TH ST W	5550861400		Downtown Specific Plan	7	185	0.02	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
218 9TH ST W	5550861300		Downtown Specific Plan	7	185	0.02	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
901 PLAZA BLVD	5565103400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.04	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 31ST ST & D AVE	5622520600		Mixed-Use Transit Corridor - Major	MXC-2	75	1.89	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	91	91	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
219 8TH ST E	5563331800		Downtown Specific Plan	9	150	0.04	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Aged Structure, Development Potential Over 25%	
818 21ST ST E	5612740100		Mixed-Use Transit Corridor - Major	MXC-2	75	0.05	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2026 HARDING AVE	5591220700		Westside Specific Plan	MCR-2	45	0.05	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
816 HOOVER AVE	5550811000		Downtown Specific Plan	1B	185	0.06	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
923 COOLIDGE AVE	5550860300		Downtown Specific Plan	7	185	0.06	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	
905 HOOVER AVE	5550850100		Downtown Specific Plan	7	185	0.06	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Development Potential Over 25%	
923 COOLIDGE AVE	5550860200		Downtown Specific Plan	7	185	0.06	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
131 8TH ST E	5563322300		Downtown Specific Plan	9	150	0.06	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
W 2ND ST & NATIONAL CITY BLVD	5550203100		Downtown Specific Plan	1A	185	0.06	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	
17 2ND ST E	5560112300		Downtown Specific Plan	2	115	0.06	Multi-Family Residential, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1322 HARDING AVE	5590351100		Westside Specific Plan	MCR-2	45	0.07	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
1326 HARDING AVE	5590351000		Westside Specific Plan	MCR-2	45	0.07	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E 20TH ST & J AVE	5611820700		High Density Residential	RM-2	48	0.07	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	2	0	2	Low Improved Building Value, Development Potential Over 25%	
720 7TH ST E	5563542000		Mixed-Use Transit Corridor - Major	MXC-2	75	0.07	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Aged Structure, Development Potential Over 25%	
404 HIGHLAND AVE	5562341000		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.07	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
W 16TH ST & NATIONAL CITY BLVD	5600640600		Downtown Specific Plan	12A	150	0.07	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	9	0	9	Low Improved Building Value, Development Potential Over 25%	
2018 HARDING AVE	5591221000		Westside Specific Plan	MCR-2	45	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
913 HOOVER AVE	5550850200		Downtown Specific Plan	7	185	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Development Potential Over 25%	
2005 WILSON AVE	5591220100		Westside Specific Plan	MCR-2	45	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
2024 HARDING AVE	5591220800		Westside Specific Plan	MCR-2	45	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
2022 HARDING AVE	5591220900		Westside Specific Plan	MCR-2	45	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
128 9TH ST W	5550850300		Downtown Specific Plan	7	185	0.08	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 18TH ST & S LANOITAN AVE	5582002500		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.09	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
E PLAZA BLVD & B AVE	5565540200		Downtown Specific Plan	5A	80	0.09	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
1028 A AVE	5565530800		Downtown Specific Plan	5A	80	0.09	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
135 NATIONAL CITY BLVD	5560112400		Downtown Specific Plan	2	115	0.09	Single Family Detached, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
E 2ND ST & HIGHLAND AVE	5560822100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.09	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
127 8TH ST E	5563322200		Downtown Specific Plan	9	150	0.09	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
HARDING AVE & CIVIC CENTER	5590351300		Westside Specific Plan	MCR-2	45	0.09	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
2011 WILSON AVE	5591220200		Westside Specific Plan	MCR-2	45	0.10	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E 1ST ST & NORTON AVE	5540131200		Low-Medium Density Residential	RS-2	9	0.10	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 9TH ST & C AVE	5564731900		Downtown Specific Plan	10	80	0.10	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
829 HOOVER AVE	5550820500		Downtown Specific Plan	7	185	0.10	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	15	15	Aged Structure, Development Potential Over 25%	
W 18TH ST & ROOSEVELT AVE	5601432200		Westside Specific Plan	MCR-1	24	0.10	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
832 18TH ST E	5611711100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.10	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1737 GROVE ST	5611541000		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.11	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 2ND ST & HIGHLAND AVE	5560825200		Low-Medium Density Residential	RS-2	9	0.11	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 20TH ST & HARBISON AVE	5583204900		Low-Medium Density Residential	RS-2	9	0.11	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 2ND ST & HIGHLAND AVE	5560825300		Low-Medium Density Residential	RS-2	9	0.11	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1302 NATIONAL CITY BLVD	5600141000		Downtown Specific Plan	12A	150	0.11	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
416 NATIONAL CITY BLVD	5550410900		Downtown Specific Plan	1A	185	0.11	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	16	16	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
W 21ST ST & WILSON AVE	5591220600		Westside Specific Plan	MCR-2	45	0.11	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
E 5TH ST & S HARBISON AVE	5541511200		Low-Medium Density Residential	RS-2	9	0.11	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
135 8TH ST E	5563322400		Downtown Specific Plan	9	150	0.12	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Aged Structure, Development Potential Over 25%	
E 12TH ST & PLAZA BLVD	5573801201		Mixed-Use Transit Corridor - Major	MXD-2	75	0.12	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
2115 HIGHLAND AVE	5612740300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.12	Single Family Multiple-Units, 3	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2137 WILSON AVE	5591251300		Westside Specific Plan	MCR-2	45	0.12	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 8TH ST & HIGHLAND AVE	5564140200		Mixed-Use Transit Corridor - Major	MXC-2	75	0.12	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
901 COOLIDGE AVE	5550861500		Downtown Specific Plan	7	185	0.12	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
140 HIGHLAND AVE	5560621700		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.12	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2119 WILSON AVE	5591251000		Westside Specific Plan	MCR-2	45	0.12	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E 24TH ST & EUCLID AVE	5640105400		Low-Medium Density Residential	RS-2	9	0.12	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
922 HOOVER AVE	5550861000		Downtown Specific Plan	7	185	0.12	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
140 NATIONAL CITY BLVD	5550201000		Downtown Specific Plan	1A	185	0.12	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	17	17	Low Improved Building Value, Development Potential Over 25%	
2605 18TH ST E	5582002400		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.13	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Aged Structure, Development Potential Over 25%	
1115 ROOSEVELT AVE	5551140200		Downtown Specific Plan	6	185	0.13	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	18	18	Low Improved Building Value, Development Potential Over 25%	
822 HOOVER AVE	5550810900		Downtown Specific Plan	1B	185	0.13	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
128 NATIONAL CITY BLVD	5550201300		Downtown Specific Plan	1A	185	0.13	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	19	19	Low Improved Building Value, Development Potential Over 25%	
1916 HARDING AVE	5591050800		Westside Specific Plan	MCR-1	24	0.13	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1	0	0	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E PLAZA BLVD & PALM AVE	5573301500		Low-Medium Density Residential	RS-2	9	0.13	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
116 NATIONAL CITY BLVD	5550201400		Downtown Specific Plan	1A	185	0.13	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
831 2ND ST E	5560825000		Low-Medium Density Residential	RS-2	9	0.13	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 20TH ST & HIGHLAND AVE	5612710200		Mixed-Use Transit Corridor - Major	MXC-2	75	0.13	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
1903 HARDING AVE	5591041300		Westside Specific Plan	MCR-2	45	0.13	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Aged Structure, Development Potential Over 25%	
2027 HIGHLAND AVE	5612710300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.13	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2006 HARDING AVE	5591221500		Westside Specific Plan	MCR-2	45	0.14	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E 21ST ST & K AVE	5612830900		Medium Density Residential	RS-3	15	0.14	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
105 8TH ST E	5563322000		Downtown Specific Plan	9	150	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	16	16	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2808 18TH ST E	5582600100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
421 NATIONAL CITY BLVD	5562102600		Downtown Specific Plan	3	115	0.14	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	12	0	12	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
712 18TH ST E	5602400100		Mixed-Use Transit Corridor - Major	MXC-2	75	0.14	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Aged Structure, Development Potential Over 25%	
1915 HARDING AVE	5591040200		Westside Specific Plan	MCR-2	45	0.14	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
420 20TH ST W	5591221100		Westside Specific Plan	MCR-2	45	0.14	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Aged Structure, Development Potential Over 25%	
E 22ND ST & PROSPECT ST	5614120900		Low-Medium Density Residential	RS-2	9	0.14	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1835 A AVE	5602101800		Medium Density Residential	RM-1	23	0.14	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	2	0	2	Low Improved Building Value, Development Potential Over 25%	
2151 HIGHLAND AVE	5612740500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.14	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
827 2ND ST E	5560824900		Low-Medium Density Residential	RS-2	9	0.15	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
HELEN CIRCLE & E 11TH ST	5573011200		Low-Medium Density Residential	RS-2	9	0.15	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
827 B AVE	5564731600		Downtown Specific Plan	10	80	0.15	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
129 NATIONAL CITY BLVD	5560112500		Downtown Specific Plan	2	115	0.15	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	14	14	Low Improved Building Value, Development Potential Over 25%	
W 21ST ST & WILSON AVE	5591220500		Westside Specific Plan	MCR-2	45	0.15	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	4	4	Low Improved Building Value, Development Potential Over 25%	
E 8TH ST & L AVE	5570911300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.15	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	
2714 16TH ST E	5582003600		Low-Medium Density Residential	RS-2	9	0.15	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
229 3RD ST E	5561031900		Low-Medium Density Residential	RS-2	9	0.15	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573511800		Low-Medium Density Residential	RS-2	9	0.15	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573511700		Low-Medium Density Residential	RS-2	9	0.15	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573512500		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
2111 HIGHLAND AVE	5612740200		Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Aged Structure, Development Potential Over 25%	
E 18TH ST & K AVE	5611920100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573511900		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
425 SHELL AVE	6693902000		Low-Medium Density Residential	RS-2	9	1.42	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	7	7	Aged Structure, Development Potential Over 25%	
E 16TH ST & M AVE	5573512000		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573512100		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
607 RACHAEL AVE	6690401100		Low-Medium Density Residential	RS-2	9	0.71	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	3	3	Aged Structure, Development Potential Over 25%	
1839 24TH ST E	5613602900		Low-Medium Density Residential	RS-2	9	0.74	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 16TH ST & M AVE	5573512200		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573512300		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & M AVE	5573512400		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
2312 13TH ST E	5573805200		Low-Medium Density Residential	RS-2	9	0.50	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Aged Structure, Development Potential Over 25%	
E 12TH ST & GROVE ST	5572902200		Low-Medium Density Residential	RS-2	9	0.16	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
2145 WILSON AVE	5591251400		Westside Specific Plan	MCR-2	45	0.16	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Development Potential Over 25%	
123 HIGHLAND AVE	5560822200		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.16	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Development Potential Over 25%	
1903 HIGHLAND AVE	5611810100		Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
14 3RD ST E	5561040200		Downtown Specific Plan	2	115	0.16	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 8TH ST & PLEASANT LN	5580230700		Low-Medium Density Residential	RS-2	9	0.16	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 18TH ST & G AVE	5602400200		Mixed-Use Transit Corridor - Major	MXC-2	75	0.16	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
127 9TH ST W	5550820600		Downtown Specific Plan	7	185	0.16	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	23	23	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
314 31ST ST E	5622520700		Mixed-Use Transit Corridor - Major	MXC-2	75	0.17	Single Family Multiple-Units, 4	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 8TH ST & HIGHLAND AVE	5565100300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.17	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & LANOITAN AVE	5581321400		Low-Medium Density Residential	RS-2	9	0.17	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1430 HOOVER AVE	5600611500		Westside Specific Plan	RS-4	17.4	0.17	Light Industry - General	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	2	0	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
306 HIGHLAND AVE	5561270300		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.18	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1902 HIGHLAND AVE	5601921500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.18	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Development Potential Over 25%	
2127 WILSON AVE	5591251700		Westside Specific Plan	MCR-2	45	0.18	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	5	5	Low Improved Building Value, Development Potential Over 25%	
910 HOOVER AVE	5550861100		Downtown Specific Plan	7	185	0.18	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	25	25	Aged Structure, Development Potential Over 25%	
E 9TH ST & PARADISE DR	5572205300		Low-Medium Density Residential	RS-2	9	0.18	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
945 N AVE	5571801600		High Density Residential	RM-3	75	1.17	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	51	0	0	51	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2013 WILSON AVE	5591220300		Westside Specific Plan	MCR-2	45	0.18	Single Family Multiple-Units, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
E 24TH ST & HARBISON AVE	5583303300		Low-Medium Density Residential	RS-2	9	0.18	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
PALM AVE & PARADISO CT	5540431300		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.18	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	6	6	Low Improved Building Value, Development Potential Over 25%	
2101 WILSON AVE	5591250900		Westside Specific Plan	MCR-2	45	0.18	Light Industry - General	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	4	4	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 14TH ST & O AVE	5573411300		Low-Medium Density Residential	RS-2	9	0.18	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
S LANOITAN AVE & E 17TH ST	5582003200		Low-Medium Density Residential	RS-2	9	0.19	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
HARBISON AVE & E 20TH ST	5583200800		Low-Medium Density Residential	RS-2	9	0.19	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1835 HIGHLAND AVE	5611710500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.19	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
317 NATIONAL CITY BLVD	5561040100		Downtown Specific Plan	2	115	0.19	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
415 NATIONAL CITY BLVD	5562102700		Downtown Specific Plan	3	115	0.19	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 30TH ST & F AVE	5622904200		Mixed-Use Transit Corridor - Major	MXD-2	75	0.19	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	9	0	9	Low Improved Building Value, Development Potential Over 25%	
316 31ST ST E	5622520500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.20	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1845 E AVE	5602320500		High Density Residential	RM-3	75	0.20	Single Family Detached, 1	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
999 NATIONAL CITY BLVD	5564711700		Downtown Specific Plan	5B	115	0.20	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Opportunity Zone Listing, Development Interest
1532 NATIONAL CITY BLVD	5600640700		Downtown Specific Plan	12A	150	0.20	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	24	0	24	Low Improved Building Value, Development Potential Over 25%	

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
821 2ND ST E	5560822300		Low-Medium Density Residential	RS-2	9	0.20	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
405 18TH ST W	5590850800		Westside Specific Plan	MCR-1	24	0.20	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
2005 HIGHLAND AVE	5612710100		Mixed-Use Transit Corridor - Major	MXC-2	75	0.20	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Aged Structure, Development Potential Over 25%	
E 14TH ST & O AVE	5573410100		Low-Medium Density Residential	RS-2	9	0.20	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 4TH ST & S HARBISON AVE	5541121800		Low-Medium Density Residential	RS-2	9	0.20	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
ROOSEVELT AVE & W 7TH ST	5550521500		Downtown Specific Plan	1B	185	0.60	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	89	0	0	89	Low Improved Building Value, Development Potential Over 25%	
521 ROOSEVELT AVE	5550421800		Downtown Specific Plan	1B	185	0.95	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	140	0	0	140	Aged Structure, Development Potential Over 25%	
E 9TH ST & C AVE	5564732000		Downtown Specific Plan	10	80	0.21	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	13	13	Low Improved Building Value, Development Potential Over 25%	
2127 HIGHLAND AVE	5612740400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.21	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	
702 HIGHLAND AVE	5563541900		Mixed-Use Transit Corridor - Major	MXC-2	75	0.21	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
333 HIGHLAND AVE	5561801600		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.21	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2035 HIGHLAND AVE	5612710400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Aged Structure, Development Potential Over 25%	
1000 HIGHLAND AVE	5565604300		Mixed-Use Transit Corridor - Major	MXD-2	75	0.22	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1825 HIGHLAND AVE	5611710400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
316 HIGHLAND AVE	5561270400		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.22	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
S LANOITAN AVE & E 17TH ST	5582102400		Low-Medium Density Residential	RS-2	9	0.22	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1941 HIGHLAND AVE	5611810400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2030 HIGHLAND AVE	5603101800		Mixed-Use Transit Corridor - Major	MXC-2	75	0.22	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 31ST ST & D AVE	5622801700		Mixed-Use Transit Corridor - Major	MXD-2	75	0.22	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	11	11	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
438 NATIONAL CITY BLVD	5550411000		Downtown Specific Plan	1A	185	0.23	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	32	32	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
339 16TH ST W	5590641600		Westside Specific Plan	RS-4	17.4	0.23	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
3117 D AVE	5622802100		Mixed-Use Transit Corridor - Major	MXD-2	75	0.23	Single Family Detached, 2	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1206 18TH ST E	5612103200		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.23	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2415 18TH ST	5581902800		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.23	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	6	6	Development Potential Over 25%	
E 17TH ST & RACHEL AVE	5582201100		Low-Medium Density Residential	RS-2	9	0.23	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
927 HIGHLAND AVE	5565100700		Mixed-Use Transit Corridor - Major	MXD-2	75	0.23	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Development Potential Over 25%	
724 HIGHLAND AVE	5563541800		Mixed-Use Transit Corridor - Major	MXC-2	75	0.24	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
205 8TH ST E	5563331500		Downtown Specific Plan	9	150	0.24	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	29	29	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
133 HIGHLAND AVE	5560822400		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.24	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Development Potential Over 25%	
E 15T ST & J AVE	5560824200		Low-Medium Density Residential	RS-2	9	0.24	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
5 18TH ST W	5601432500		Westside Specific Plan	MCR-1	24	0.24	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
110 8TH ST W	5550821000		Downtown Specific Plan	7	185	0.25	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	38	38	Low Improved Building Value, Development Potential Over 25%	
2037 VAN NESS AVE	5583200900		Low-Medium Density Residential	RS-2	9	0.25	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 24TH ST & HARBISON AVE	5583302700		Low-Medium Density Residential	RS-2	9	0.25	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
E 9TH ST & R AVE	5572001500		Low-Medium Density Residential	RS-2	9	1.33	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
W 21ST ST & WILSON AVE	5591220400		Westside Specific Plan	MCR-2	45	0.26	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	
E 16TH ST & EARLE DR	5581402600		Low-Medium Density Residential	RS-2	9	0.26	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
111 HIGHLAND AVE	5560822000		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.26	Single Family Multiple-Units, 3	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	5	5	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
510 HIGHLAND AVE	5562341800		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.26	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
740 8TH ST E	5564921400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.26	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1912 HIGHLAND AVE	5601921600		Mixed-Use Transit Corridor - Major	MXC-2	75	0.27	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	
322 HIGHLAND AVE	5561270500		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.28	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Development Potential Over 25%	
1302 8TH ST E	5571720900		Mixed-Use Transit Corridor - Major	MXC-2	75	0.28	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 21ST ST & HIGHLAND AVE	5603100300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.28	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	14	0	14	Low Improved Building Value, Development Potential Over 25%	
1539 8TH ST E	5571021900		Mixed-Use Transit Corridor - Major	MXC-2	75	0.28	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1526 18TH ST E	5612222300		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.28	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 2ND ST & MARIPOSA ST	5541121500		Low-Medium Density Residential	RS-2	9	0.64	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
E 28TH ST & N AVE	5631002600		Low-Medium Density Residential	RS-1	4	1.31	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
1610 NATIONAL CITY BLVD	5601440100		Westside Specific Plan	MCR-1	24	0.28	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
1146 NATIONAL CITY BLVD	5551141300		Downtown Specific Plan	6	185	0.31	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	45	45	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 10TH ST & PARADISE DR	5572201900		Low-Medium Density Residential	RS-2	9	0.32	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
807 8TH ST E	5564140700		Mixed-Use Transit Corridor - Major	MXC-2	75	0.32	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
1919 HIGHLAND AVE	5611810300		Mixed-Use Transit Corridor - Major	MXC-2	75	0.32	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	14	14	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 9TH ST & K AVE	5565105900		Mixed-Use Transit Corridor - Major	MXD-2	75	0.33	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	16	0	16	Low Improved Building Value, Development Potential Over 25%	
1420 NATIONAL CITY BLVD	5600630700		Downtown Specific Plan	12A	150	0.33	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	40	40	Low Improved Building Value, Development Potential Over 25%	
903 HIGHLAND AVE	5565100600		Mixed-Use Transit Corridor - Major	MXC-2	75	0.34	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
748 10TH ST E	5565604200		Mixed-Use Transit Corridor - Major	MXD-2	75	0.34	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	17	17	Low Improved Building Value, Development Potential Over 25%	
2501 18TH ST E	5581903600		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.34	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	11	11	Low Improved Building Value, Development Potential Over 25%	
423 NATIONAL CITY BLVD	5562102500		Downtown Specific Plan	3	115	0.34	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	30	30	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1031 NATIONAL AVE	5565530500		Downtown Specific Plan	5B	115	0.35	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	31	0	31	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
21 4TH ST E	5561041700		Downtown Specific Plan	2	115	0.35	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	30	30	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1470 NATIONAL CITY BLVD	5600630600		Downtown Specific Plan	12A	150	0.35	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	16	16	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1441 PARAISO CT	5540430400		Low-Medium Density Residential	RS-2	9	0.36	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1605 4TH ST E	5540501900		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.36	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	10	10	Low Improved Building Value, Development Potential Over 25%	
510 NATIONAL CITY BLVD	5550421500		Downtown Specific Plan	1B	185	0.36	Hotel/Motel (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	29	29	Low Improved Building Value, Aged Structure, Development Potential Over 25%	Consolidation Based on Ownership
943 HIGHLAND AVE	5565103500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.36	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1615 PLAZA BLVD E	5574101100		Mixed-Use Transit Corridor - Major	MXD-2	75	0.37	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
111 NATIONAL CITY BLVD	5560112600		Downtown Specific Plan	2	115	0.37	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	33	0	33	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1421 PARAISO CT	5540430300		Low-Medium Density Residential	RS-2	9	0.38	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Aged Structure, Development Potential Over 25%	
333 NATIONAL CITY BLVD	5561041800		Downtown Specific Plan	2	115	0.38	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	35	35	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
911 PLAZA BLVD	5565906200		Mixed-Use Transit District - Major	MXD-2	75	0.38	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	19	19	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2504 HIGHLAND AVE	5620720600		Mixed-Use Transit Corridor - Major	MXC-2	75	0.38	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	19	19	Low Improved Building Value, Development Potential Over 25%	
820 HIGHLAND AVE	5564921500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.39	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Low Improved Building Value, Development Potential Over 25%	
710 8TH ST E	5564921000		Mixed-Use Transit Corridor - Major	MXC-2	75	0.39	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2004 HIGHLAND AVE	5603101400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.39	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	16	16	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
500 PLAZA BLVD E	5565603900		Mixed-Use Transit Corridor - Major	MXD-2	75	0.39	Vacant	Yes - Current	YES - City-Owned	Available	Not Used in Prior Housing Element	0	19	0	19	Low Improved Building Value, Development Potential Over 25%	
845 HIGHLAND AVE	5565100500		Mixed-Use Transit Corridor - Major	MXC-2	75	0.40	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	17	17	Low Improved Building Value, Development Potential Over 25%	
127 NORTON AVE	5540431500		Low-Medium Density Residential	RS-2	9	0.40	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1003 N AVE	5572500100		High Density Residential	RM-3	75	0.41	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	17	17	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
242 PALM AVE	5540302100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.41	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	12	0	12	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
305 8TH ST E	5563341900		Downtown Specific Plan	9	150	0.41	Office (Low-Rise)	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	50	50	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1924 HARDING AVE	5591051200		Westside Specific Plan	MCR-1	24	0.43	Single Family Multiple-Units, 4	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3	0	0	3	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
804 8TH ST E	5565103600		Mixed-Use Transit Corridor - Major	MXC-2	75	0.44	Service Station	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	21	21	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
2835 HIGHLAND AVE	5631210800		Mixed-Use Transit Corridor - Major	MXC-2	75	0.51	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	25	0	25	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1628 ORANGE ST	5611601600		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.52	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	16	0	0	16	Low Improved Building Value, Development Potential Over 25%	
815 HIGHLAND AVE	5565100400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.57	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	27	27	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1803 HIGHLAND AVE	5611711800		Mixed-Use Transit Corridor - Major	MXC-2	75	0.58	Service Station	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	27	27	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
310 PALM AVE	5540301800		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.61	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	18	18	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1810 HIGHLAND AVE	5602400700		Mixed-Use Transit Corridor - Major	MXC-2	75	0.68	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	33	33	Low Improved Building Value, Development Potential Over 25%	
1606 PLAZA BLVD	5574101500		Mixed-Use Transit Corridor - Major	MXD-2	75	0.61	Service Station	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	29	0	0	29	Low Improved Building Value, Development Potential Over 25%	
MILES OF CARS WAY & HOOV	5623406800		Mixed-Use Transit Corridor - Major	MXC-2	75	0.86	Automobile Dealership	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	42	42	Low Improved Building Value, Development Potential Over 25%	
325 MILES OF CARS WAY	5623405600		Mixed-Use Transit Corridor - Major	MXC-2	75	1.12	Automobile Dealership	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	55	55	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1005 PLAZA BLVD E	5565906300		Mixed-Use Transit Corridor - Major	MXD-2	75	1.62	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	79	79	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 30TH ST & D AVE	5623222600		Mixed-Use Transit Corridor - Major	MXD-2	75	1.85	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	90	0	0	90	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
3200 D AVE	5623220100		Mixed-Use Transit Corridor - Major	MXD-2	75	2.41	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	116	0	116	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
E 31ST ST & D AVE	5623220200		Mixed-Use Transit Corridor - Major	MXD-2	75	2.41	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	117	0	0	117	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
E 4TH ST & Q AVE	5540501100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.90	Other Public Services	Yes - Current	YES - City-Owned	Available	Used in Prior Housing Element - Non-Vacant	28	0	0	28	Low Improved Building Value, Development Potential Over 25%	
1019 HIGHLAND AVE	5565906100		Mixed-Use Transit Corridor - Major	MXD-2	75	8.30	Community Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	403	403	Aged Structure, Development Potential Over 25%	Development Interest
903 PLAZA BLVD E	5565902000		Mixed-Use Transit District - Major	MXD-2	75	1.02	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	50	0	0	50	Low Improved Building Value, Development Potential Over 25%	Opportunity Zone Listing, Development Interest
1020 HIGHLAND AVE	5565604400		Mixed-Use Transit Corridor - Major	MXD-2	75	1.37	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	67	0	0	67	Low Improved Building Value, Development Potential Over 25%	
E 31ST ST & D AVE	5622804200		Mixed-Use Transit Corridor - Major	MXD-2	75	2.03	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	99	0	0	99	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
E 31ST ST & D AVE	5623223000		Mixed-Use Transit Corridor - Major	MXD-2	75	2.24	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	109	0	109	Low Improved Building Value, Development Potential Over 25%	INTRACConnect Site
1712 NATIONAL AVE	5601440300		Westside Specific Plan	MCR-1	24	0.56	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	9	9	Low Improved Building Value, Aged Structure, Development Potential Over 25%	INTRACConnect Site

Table A: Housing Element Sites Inventory

Site Address/Intersection	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2
W 21ST ST & WILSON AVE	5601433600		Westside Specific Plan	MCR-1	24	0.58	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	9	9	Low Improved Building Value, Development Potential Over 25%	
5 18TH ST W	5601432600		Westside Specific Plan	MCR-1	24	0.58	Automobile Dealership	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	8	8	Aged Structure, Development Potential Over 25%	
RACHEL AVE & SHAW ST	5583301600		Low-Medium Density Residential	RS-2	9	0.44	Undeveloped	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
CUMBERLAND ST & RACHAEL	5583202100		Low-Medium Density Residential	RS-2	9	0.44	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E PLAZA BLVD & N AVE	5572502000		High Density Residential	RM-3	75	0.45	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	20	0	20	Low Improved Building Value, Development Potential Over 25%	
205 HIGHLAND AVE	5561800100		Mixed-Use Transit Corridor - Minor	MXC-1	48	0.45	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	13	13	Low Improved Building Value, Development Potential Over 25%	
1111 PLAZA BLVD	5565904900		Mixed-Use Transit Corridor - Major	MXD-2	75	0.46	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	21	21	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
1929 HARDING AVE	5591040300		Westside Specific Plan	MCR-2	45	0.46	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	12	12	Low Improved Building Value, Development Potential Over 25%	
1940 HIGHLAND AVE	5601921400		Mixed-Use Transit Corridor - Major	MXC-2	75	0.47	Arterial Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	23	23	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 24TH ST & PROSPECT ST	5614203000		Low-Medium Density Residential	RS-2	9	0.47	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	0	3	3	Low Improved Building Value, Development Potential Over 25%	
2222 5TH ST E	5570720200		Medium Density Residential	RS-3	15	0.49	Single Family Multiple-Units, 3	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	1	1	Low Improved Building Value, Development Potential Over 25%	
1734 11TH ST E	5572804200		Low-Medium Density Residential	RS-2	9	0.49	Vacant	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
E 9TH ST & K AVE	5565106000		Mixed-Use Transit Corridor - Major	MXD-2	75	0.49	Neighborhood Shopping Center	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	24	0	24	Low Improved Building Value, Development Potential Over 25%	
1610 NATIONAL CITY BLVD	5601440200		Westside Specific Plan	MCR-1	24	0.49	Other Retail Trade and Strip Commercial	Yes - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	0	0	7	7	Low Improved Building Value, Development Potential Over 25%	INTRACONnect Site
2440 J AVE	5630102300		Low-Medium Density Residential	RS-2	9	0.50	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Low Improved Building Value, Development Potential Over 25%	
844 ARCADIA PL	5580210600		Low-Medium Density Residential	RS-2	9	0.50	Single Family Detached, 1	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	0	0	2	2	Low Improved Building Value, Aged Structure, Development Potential Over 25%	
E 9TH ST & K AVE	5565105800		Mixed-Use Transit Corridor - Major	MXD-2	75	0.50	Vacant	Yes - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	0	24	0	24	Low Improved Building Value, Development Potential Over 25%	
W 22ND ST & HOOVER AVE	5623406700		Westside Specific Plan	MCR-2	45	1.21	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	34	0	0	34	Low Improved Building Value, Development Potential Over 25%	
W 22ND ST & HOOVER AVE	5623406600		Westside Specific Plan	MCR-2	45	1.58	Parking Lot - Surface	Yes - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	45	0	0	45	Low Improved Building Value, Development Potential Over 25%	

Site Inventory - Existing Conditions for Mixed Use Districts and Corridors



10 National City Blvd



21 W 7th St



122 National City Blvd



133 Highland Ave



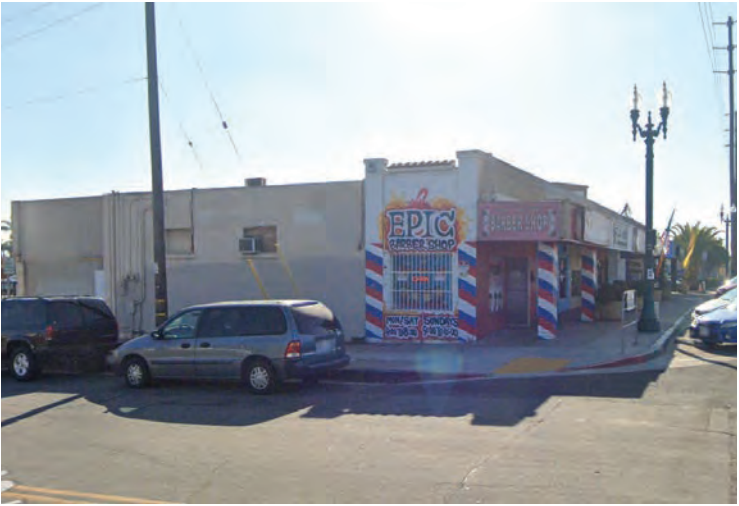
139 E 8th St



140 Highland Ave



205 E 8th St



205 Highland Ave



213 Highland Ave



214 National City Blvd



310 National City Blvd



234 Highland Ave

Site Inventory - Existing Conditions for Mixed Use Districts and Corridors



510 National City Blvd



540 National City Blvd



702 Highland Ave



710 E 8th St



724 Highland Ave



740 E 8th St



831 E 8th St



845 E 8th St



901 Coolidge Ave



907 E Plaza Blvd



922 Hoover Ave



1019 Highland Ave

Site Inventory - Existing Conditions for Mixed Use Districts and Corridors



1025 E 9th St



1105 E Plaza



1419 E 8th St



1539 E 8th St



1631 E 8th St



1903 Highland Ave



1919 Highland Ave



2004 Highland Ave



2005 Highland Ave



3119 D Ave



2035 Highland Ave



1602 E 18th St

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APPENDIX E: DEVELOPMENT CASE STUDIES

Mixed use and multi-family residential projects permitted and/or constructed within National City during the 5th Housing Element Cycle were analyzed for development trends. Projects ranged from 10 units to 131 and were developed in multiple different zones across the City. The following trends are observed from these case studies:

- » Projects vary in leveraging the maximum site capacity, across all zones. Projects range from 46 percent to 176 percent of the maximum potential density. In general, the highest average of the maximum potential density has been within the mixed use zones, Downtown Specific Plan Area, and Westside Specific Plan area.
- » Non-vacant sites have been successfully redeveloped to more intense uses. Projects such as the Kimball (47 units), Alinea Townhomes (10 units), and Vista Jardin (10 units) show the redevelopment of non-vacant sites, including formerly single-family residential uses, to more intense development.
- » Lot consolidation has been viable for both market rate and affordable housing. The Coachella Affordable Housing project (131 affordable units) and Mariner's Landing (61 market rate units) both involved successful lot consolidation. Within the Downtown, development patterns trend towards half to nearly full blocks.

Case studies are summarized in the following table; projects are each accompanied by a one-page information sheet.

MULTI-FAMILY RESIDENTIAL PROJECTS PERMITTED AND/OR CONSTRUCTED DURING CYCLE 5

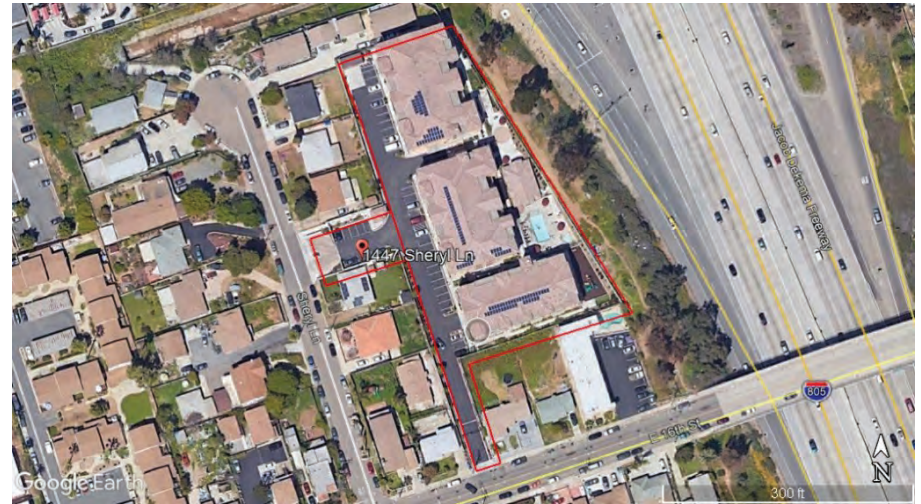
Project	Units	Acreage	Zone	Max Density	Max FAR	Project Density	Adjustment Factor
RESIDENTIAL ZONES							
Vista Jardin	10	0.28	RM-3	75	N/A	36	0.48
Alinea Townhomes	10	0.29	RM-3	75	N/A	34	0.46
Average						35	0.47
MIXED USE ZONES							
Mariner's Landing	61	1.84	MXC-1	48	2.0:1	33	0.69
Plaza Del Rey	15	0.32	MXC-2	75	3.5:1	47	0.63
The Kimball	47	0.88	MXC-2	75	3.5:1	53	0.71
Bella Vita	70	1.76	MXD-2	75	2.5:1	40	0.53
Palm Plaza	77	2.2	MXD-2	75	2.5:1	35	0.47
Average						42	0.60
WESTSIDE SPECIFIC PLAN							
Paradise Creek Apartments	201	1.9	MCR-2TOD	60	2.5:1	106	1.76
Average						106	1.76
DOWNTOWN SPECIFIC PLAN							
8th and B (Malick)	108	0.66	DSP DZ 9	195	[*] 5:1	164	0.84
Coachella Affordable Housing	131	1.33	DSP DZ 5B	150	[*] 4:1	98	0.66
Average						131	0.75

^{*} Estimate based on development scenario with at-grade parking, governed by FAR

BELLA VITA



Site location and prior use.



Completed project.

Project: Bella Vita
Address: 1447-1505 Sheryl Lane
APN: 5574302700; 5574301500
Prior Use: Vacant
Units Developed: 70
 Above Moderate: 70
 Moderate: 0
 Lower: 0
Status: Constructed
Site Area (Acres): 1.76
Zone: MXD-2
Description: Mixed Use District, Major (Up to 75 du/ac)
Max Allowable Density: 75 du/ac

Project Density: 70 units
 1.76 acres

40 du/ac

Adjustment Factor: 40 du/ac
 75 du/ac

0.53

VISTA JARDIN



Site location and prior use.



Completed project.

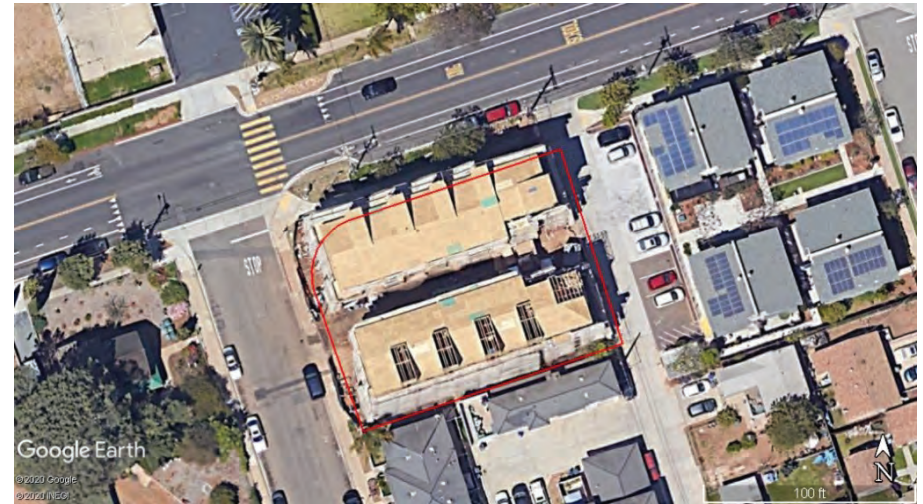
Project:	Vista Jardin
Address:	1904 F Ave
APN:	5602521400
Prior Use:	Non-Vacant (Single-Family Detached)
Units Developed:	10
Above Moderate:	10
Moderate:	0
Lower:	0
Status:	Constructed
Site Area (Acres):	0.28
Zone:	RM-3
Description:	Very High Density Multi-Unit Residential (49-75 du/ac)
Max Allowable Density:	75 du/ac

Project Density:	10 units	Adjustment Factor:	36 du/ac
	0.28 acres		75 du/ac
	<hr/>		<hr/>
	36 du/ac		0.48

ALINEA TOWNHOMES



Site location and prior use.



Completed project.

Project:	Alinea Townhomes
Address:	1823 F Ave
APN:	5602331000
Prior Use:	Non-Vacant (Single-Family Detached)
Units Developed:	10
Above Moderate:	10
Moderate:	0
Lower:	0
Status:	Constructed
Site Area (Acres):	0.29
Zone:	RM-3
Description:	Very High Density Multi-Unit Residential (49-75 du/ac)
Max Allowable Density:	75 du/ac

Project Density:	10 units	Adjustment Factor:	34 du/ac
	0.29 acres		75 du/ac
	34 du/ac		0.46

MARINER'S LANDING



Site location and prior use.



Completed project.

Project: Mariner's Landing
Address: 142 E 31st St
APN: 5622521900; 5622521700; 5622521800; 5622522000
Prior Use: Non-Vacant (Multiple Single-Family Detached Units)
Units Developed: 61
 Above Moderate: 61
 Moderate: 0
 Lower: 0
Status: Constructed
Site Area (Acres): 1.84
Zone: MXC-2
Description: Mixed Use Corridor, Major (Up to 75 du/ac)
Max Allowable Density: 75 du/ac

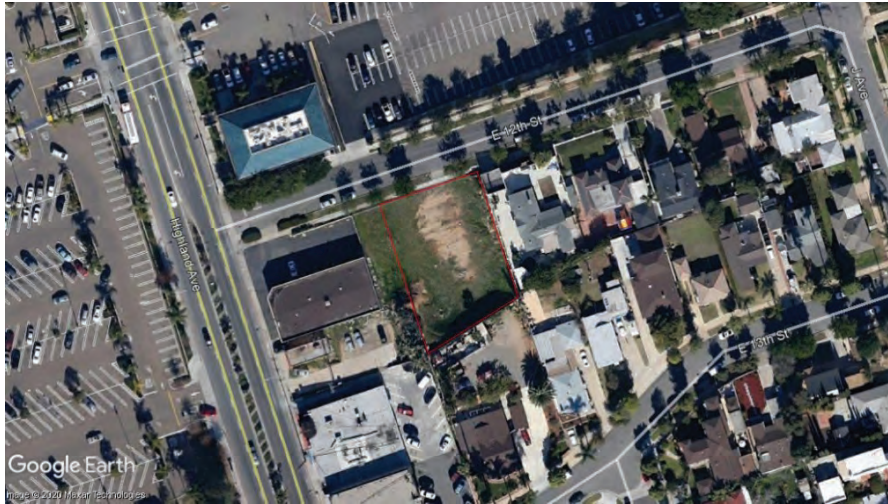
Project Density: 15 units
 1.84 acres

8 du/ac

Adjustment Factor: 8 du/ac
 75 du/ac

0.11

PLAZA DEL REY



Site location and prior use.



Completed project.

Project:	Plaza Del Rey
Address:	900 E 12th St
APN:	5610110600
Prior Use:	Non-Vacant
Units Developed:	15
Above Moderate:	15
Moderate:	0
Lower:	0
Status:	Constructed
Site Area (Acres):	0.32
Zone:	MXC-2
Description:	Mixed Use Corridor, Major (Up to 75 du/ac)
Max Allowable Density:	75 du/ac

Project Density:	15 units	Adjustment Factor:	47 du/ac
	0.32 acres		75 du/ac
	47 du/ac		0.63

THE KIMBALL



Site location and prior use.



Completed project.

Project: The Kimball
Address: 1110 E 8th St
APN: 5565106300
Prior Use: Non-Vacant (Single-Family Detached)
Units Developed: 47
 Above Moderate: 47
 Moderate: 0
 Lower: 0
Status: Constructed
Site Area (Acres): 0.88
Zone: MXC-2
Description: Mixed Use Corridor, Major (Up to 75 du/ac)
Max Allowable Density: 75 du/ac

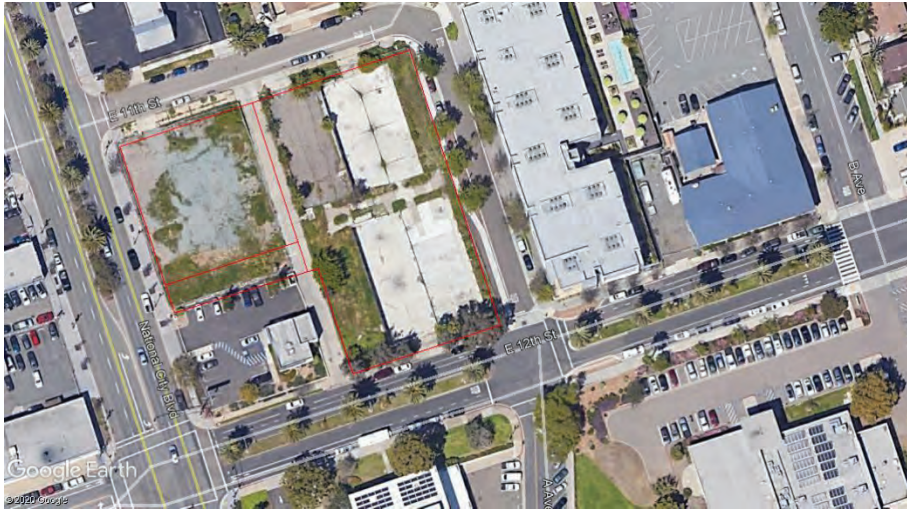
Project Density: 47 units
 0.88 acres

53 du/ac

Adjustment Factor: 53 du/ac
 75 du/ac

0.71

COACHELLA AFFORDABLE HOUSING



Site location and prior use.

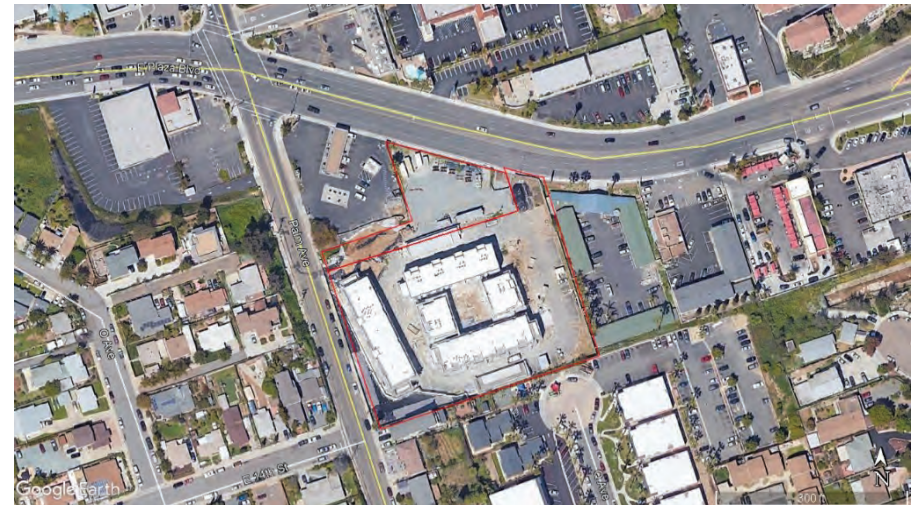
Project:	Coachella Affordable Housing Investors Project		
Location:	E 11th St & National City Boulevard		
APN:	5565542500; 5565542600; 5565542000		
Prior Use:	Non-Vacant		
Units Developed:	131		
Above Moderate:	0		
Moderate:	0		
Lower:	131		
Status:	Construction In Progress		
Site Area (Acres):	1.33		
Zone:	DSP DZ 5B		
Description:	Specific Plan (Max FAR of 4:1)		
Max Allowable Density:	150 du/ac ¹		
	¹ Estimate based on at-grade parking, governed by FAR		

Project Density:	131 units	Adjustment Factor:	98 du/ac
	1.33 acres		150 du/ac
	98 du/ac		0.66

PALM PLAZA



Site location and prior use.



Completed project.

Project: Palm Plaza
Address: 1632-1640 Plaza BLVD E
APN: 5574102700; 5574102800
Prior Use: Vacant
Units Developed: 77
 Above Moderate: 77
 Moderate: 0
 Lower: 0
Status: Constructed
Site Area (Acres): 2.2
Zone: MXD-2
Description: Mixed Use District, Major (Up to 75 du/ac)
Max Allowable Density: 75 du/ac

Project Density: 77 units
 2.2 acres

35 du/ac

Adjustment Factor: 35 du/ac
 75 du/ac

0.47

PARADISE CREEK APARTMENTS



Site location and prior use.



Completed project.

Project: Paradise Creek Apartments
Address: 2120 Hoover Ave
APN: 5602060800; 7602550200; 5603911100; 5603911200; 559124800
Prior Use: Non-Vacant (Industrial)
Units Developed: 201
 Above Moderate: 0
 Moderate: 47
 Lower: 154
Status: Constructed
Site Area (Acres): 1.90
Zone: MCR-2
Description: Westside Specific Plan (60 du/ac)
Max Allowable Density: 60 du/ac

Other: Affordable housing project developed using Low-Income Housing Tax Credit

Project Density:	201 units	Adjustment Factor:	106 du/ac
	1.90 acres		60 du/ac
	106 du/ac		1.76

8TH AND B



Site location and prior use.



Conceptual project rendering.

Project: 8th and B (Malick)

Address: 130 E 8th St

APN: 7602357800

Prior Use: Non-Vacant (Retail)

Units Developed: 108

Above Moderate: 108

Moderate: 0

Lower: 0

Status: Construction In Progress

Site Area (Acres): 0.66

Zone: DSP DZ 9

Description: Specific Plan (Max FAR of 5:1)

Max Allowable Density: 179 du/ac¹

¹ Estimate based on at-grade parking, governed by FAR

Other: Includes 7,000 s.f. commercial

Project Density: 108 units

0.66 acres

164 du/ac

Adjustment Factor: 164 du/ac

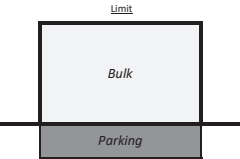

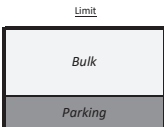
179 du/ac

0.91

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APPENDIX F: DOWNTOWN SITE CAPACITY ANALYSIS SCENARIOS

DOWNTOWN DEVELOPMENT SCENARIOS - FLOOR AREA RATIO (FAR) AND POTENTIAL DENSITY

Range (Low-to-High) in Residential Densities by FAR, Block Scale, and Development Scenario														
Bulk Diagram		FAR 2.0	FAR 2.5	FAR 3.0	FAR 4.0	FAR 5.0	FAR 6.0	Notes on Each Scenario						
Development Scenario: Below-Grade Parking (Maximum Program Bulk based on Limitations of Allowable FAR)														
		Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	
	Full Block	48	58	65	75	83	93	117	127	152	162	187	197	Below-grade parking development scenario maxes out the FAR and assumed that the geometry of each site can make below-grade parking work as needed; and accounts for assumed ground floor retail on full and half block sites. Below-grade parking will be more challenging on half and quarter block sites.
	1/2 Block*	45	55	63	73	80	90	115	125	150	160	185	195	
	1/4 Block**	65	75	82	92	100	110	134	144	169	179	204	214	
Development Scenario: At-Grade Parking (Max out Program Bulk based on Limitations of Allowable FAR)														
		Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	
	Full Block	48	58	65	75	83	93	117	127	152	162	187	197	At-grade development scenario maxes out based on allowable FAR, so structures will be substantially taller and it is assumed that parking requirements are not met; and accounts for assumed ground floor retail on full and half block sites.
	1/2 Block	45	55	63	73	80	90	115	125	150	160	185	195	
	1/4 Block**	65	75	82	92	100	110	134	144	169	179	204	214	
Development Scenario: At-Grade Parking (Max out Program Bulk based on Limitations of Parking Ratio)														
		Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	
	Full Block	22	32	22	32	22	32	22	32	22	32	22	32	At-grade development scenario balances the amount of building with the land available for parking that meets assumed minimum ratios, thus bulk is limited based on that rather than FAR; and accounts for assumed ground floor retail on full and half block sites.
	1/2 Block	25	35	25	35	25	35	25	35	25	35	25	35	
	1/4 Block**	43	53	43	53	43	53	43	53	43	53	43	53	
Development Scenario: Above-Grade Parking (Balances Program and Parking Bulk based on Limitations of Allowable FAR)														
		Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	
	Full Block	33	43	44	54	57	67	82	92	107	117	132	142	Above-grade parking development scenario balances the volume of the building with the volume of structured parking within the limitations of FAR, and assumed site geometry allows this; and accounts for assumed ground floor retail on full and half block sites.
	1/2 Block*	30	40	43	53	55	65	81	91	104	114	130	140	
	1/4 Block**	45	55	54	64	68	78	94	104	117	127	144	154	

*Structured parking will be difficult on these sites; however, the calculation has been done the same as the full block.

**Structured parking will be incredibly difficult on these sites; however, the calculation has been done the same as the full block and does NOT include adjustments for Ground Floor Retail

5.0 Range can be adjusted to increase low/high range in table.

8.3 Native American Heritage Commission Request



Community Development Department – Planning Division
1243 National City Blvd., National City, CA 91950

August 07, 2020

California Native American Heritage Commission

1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691
916-373-3710 - Phone
916-373-5471 - Fax
nahc@nahc.ca.gov

Dear California Native American Heritage Commission,

On behalf of the City of National City, WSP USA is conducting a focused update to the General Plan. All cities and counties in the State of California are required to have an adopted General Plan, which provides the overarching policy direction for local growth and development. The City's General Plan was last updated in 2011. Since then, new state laws have been passed related to land use, housing, transportation, safety, and climate change. The intent of the focused update is to address these new requirements and compile more recent data to inform citywide goals and policies within the Land Use, Mobility, Housing, and Safety elements of the General Plan.

Per California Senate Bill (SB) 18 and Assembly Bill (AB) 52, we would like to request a Local Government Tribal Consultation list for the jurisdiction of National City, California. We would like to begin consultation with local tribal nations and to provide them notification of an opportunity to participate in local land use decisions for the General Plan Update, as well as to provide them opportunity to request in writing notification of the environmental scoping proposed for the General Plan Update.

Please send the list to our WSP USA consultant, Stephanie Whitmore and Annie Lee at Stephanie.Whitmore@wsp.com and Annie.Lee1@wsp.com.

Should you have any questions about this effort, please direct them to myself, Martin Reeder who can be reached at (619) 336-4313 and mreeder@nationalcityca.gov.

Kind regards,

Martin Reeder
Principal Planner

XX/xx
Encl. Map of National City, NAHC Local Government Tribal Consultation List Request form.
cc:



Community Development Department – Planning Division
1243 National City Blvd., National City, CA 91950

Map of National City



8.4 Native American Heritage Commission Response & Tribal Consultation List



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Aitebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
[Vacant]

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

September 1, 2020

Martin Reeder
City of National City

Via Email to: stephanie.whitmore@wsp.com

Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, City of National City Project, San Diego County

Dear Mr. Reeder:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:
 - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
 - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
 - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
 - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.
2. The results of any archaeological inventory survey that was conducted, including:
 - Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code Section 6254.10.
3. The result of the Sacred Lands File (SFL) check conducted through the Native American Heritage Commission. The request form can be found at <http://nahc.ca.gov/wp-content/uploads/2015/08/Local-Government-Tribal-Consultation-List-Request-Form-Update.pdf>.
4. Any ethnographic studies conducted for any area including all or part of the potential APE; and
5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,



Steven Quinn
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Tribal Consultation List
San Diego County
9/1/2020**

Barona Group of the Capitan Grande

Edwin Romero, Chairperson
1095 Barona Road Diegueno
Lakeside, CA, 92040
Phone: (619) 443 - 6612
Fax: (619) 443-0681
cloyd@barona-nsn.gov

Campo Band of Diegueno Mission Indians

Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno
Campo, CA, 91906
Phone: (619) 478 - 9046
Fax: (619) 478-5818
rgoff@campo-nsn.gov

Ewiaapaayp Band of Kumeyaay Indians

Robert Pinto, Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
wmicklin@leaningrock.net

Ewiaapaayp Band of Kumeyaay Indians

Michael Garcia, Vice Chairperson
4054 Willows Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 6315
Fax: (619) 445-9126
michaelg@leaningrock.net

Iipay Nation of Santa Ysabel

Virgil Perez, Chairperson
P.O. Box 130 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 765 - 0845
Fax: (760) 765-0320

Inaja-Cosmit Band of Indians

Rebecca Osuna, Chairperson
2005 S. Escondido Blvd. Diegueno
Escondido, CA, 92025
Phone: (760) 737 - 7628
Fax: (760) 747-8568

Jamul Indian Village

Lisa Cumper, Tribal Historic
Preservation Officer
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4855
lcumper@jiv-nsn.gov

Jamul Indian Village

Erica Pinto, Chairperson
P.O. Box 612 Diegueno
Jamul, CA, 91935
Phone: (619) 669 - 4785
Fax: (619) 669-4817
epinto@jiv-nsn.gov

Kwaaymii Laguna Band of Mission Indians

Carmen Lucas,
P.O. Box 775 Diegueno
Pine Valley, CA, 91962
Phone: (619) 709 - 4207
Kwaaymii

La Posta Band of Diegueno Mission Indians

Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
LP13boots@aol.com

La Posta Band of Diegueno Mission Indians

Javaughn Miller, Tribal
Administrator
8 Crestwood Road Diegueno
Boulevard, CA, 91905
Phone: (619) 478 - 2113
Fax: (619) 478-2125
jmiller@LPtribe.net

Manzanita Band of Kumeyaay Nation

Angela Elliott Santos, Chairperson
P.O. Box 1302 Diegueno
Boulevard, CA, 91905
Phone: (619) 766 - 4930
Fax: (619) 766-4957

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65352.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed City of National City Project, San Diego County.

**Native American Heritage Commission
Tribal Consultation List
San Diego County
9/1/2020**

***Mesa Grande Band of Diegueno
Mission Indians***

Michael Linton, Chairperson
P.O Box 270 Diegueno
Santa Ysabel, CA, 92070
Phone: (760) 782 - 3818
Fax: (760) 782-9092
mesagrandeband@msn.com

***San Pasqual Band of Diegueno
Mission Indians***

Allen Lawson, Chairperson
P.O. Box 365 Diegueno
Valley Center, CA, 92082
Phone: (760) 749 - 3200
Fax: (760) 749-3876
allenl@sanpasqualtribe.org

***Sycuan Band of the Kumeyaay
Nation***

Cody Martinez, Chairperson
1 Kwaaypaay Court Kumeyaay
El Cajon, CA, 92019
Phone: (619) 445 - 2613
Fax: (619) 445-1927
ssilva@sycuan-nsn.gov

***Viejas Band of Kumeyaay
Indians***

John Christman, Chairperson
1 Viejas Grade Road Diegueno
Alpine, CA, 91901
Phone: (619) 445 - 3810
Fax: (619) 445-5337

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Sections 65352.3, 65352.4 et seq. and Public Resources Code Sections 21080.3.1 for the proposed City of National City Project, San Diego County.

8.5 Tribal Consultation Letter per SB18/AB 52



September 03, 2020

Name
Tribe
Address
Phone
Fax
Email

Dear [Name],

On behalf of the City of National City, WSP USA is conducting a focused update to the General Plan. All cities and counties in the State of California are required to have an adopted General Plan, which provides the overarching policy direction for local growth and development. The City's General Plan was last updated in 2011. Since then, new state laws have been passed related to land use, housing, transportation, safety, and climate change. The intent of the focused update is to address these new requirements and compile more recent data to inform citywide goals and policies within the Land Use, Mobility, Housing, and Safety elements of the General Plan.

Per California Senate Bill (SB) 18, we would like to notify you of the intent to update the National City General Plan from 2011 and provide you an opportunity to consult with us on land use decisions being made within the General Plan Update. Please also consider this letter a formal notification of the proposed Project's intent to complete an environmental document as required under California Environmental Quality Act Public Resources Code 21080.3.1 and Chapter 532 Statutes of 2014 (i.e. Assembly Bill (AB) 52).

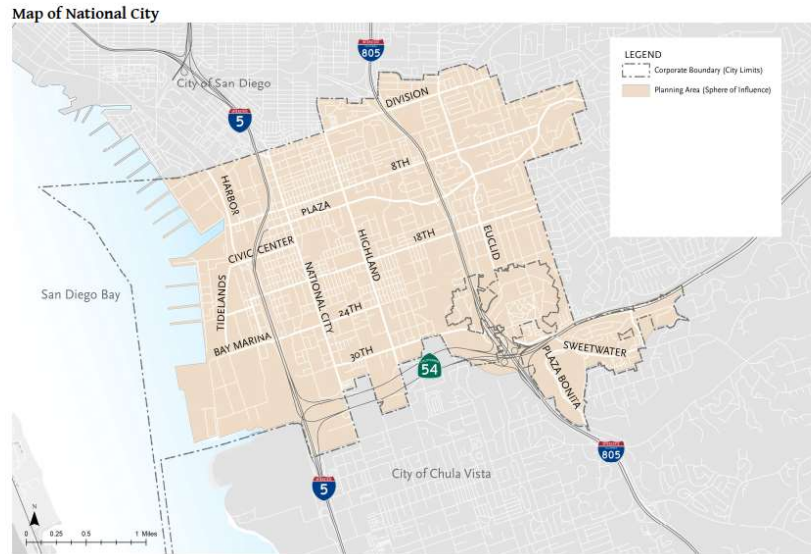
We are requesting any information you wish to contribute regarding the sensitivity for cultural tribal resources in the area and your concerns regarding the Project's potential effect on those resources. As such, if you would like to request formal consultation with us for the General Plan Update process and for the environmental scoping proposed for the General Plan Update, please notify us of your request in writing.

Should you have any questions about this effort, please direct them to myself, Martin Reeder who can be reached at (619) 336-4313 and mreeder@nationalcityca.gov and our consultant team at WSP USA, Stephanie Whitmore, Stephanie.Whitmore@wsp.com and Annie Lee. Annie.Lee1@wsp.com.

Kind regards,

Martin Reeder
Principal Planner

XX/xx
Encl. Map of National City
cc:



8.6 CDFW Letter of No Effect Determination

DocuSign Envelope ID: 0DF69336-14FD-457B-BDFC-755562EC46C1



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



CEQA Filing Fee No Effect Determination

Applicant Name and Address:

Martin Reeder
National City
1243 National City Blvd.
National City, CA 91950
mreeder@nationalcityca.gov

CEQA Lead Agency: National City

Project Title: Housing Element Update

CEQA Document Type: Negative Declaration

State Clearinghouse Number: 2021020241

Project Location: National City, San Diego County, California

Brief Project Description: The Project is City-wide. National City is a centrally located, 9.2 square-mile San Diego South Bay urban community in San Diego County, California.

The Project is an update to the 2011 National City General Plan Housing Element and serves as a plan to accommodate the City's housing needs of from 2021 through 2029. The proposed update would address new state laws regulating housing and would provide policy changes to encourage the production of adequate housing at all income levels to satisfy the 6th Housing Cycle RHNA goal. The Project includes a site inventory, revised programs, and revised policies to streamline the permit and development process, maintain affordability and access to housing across all income categories, and provide resources to residents. No physical development is authorized with the adoption of this Project. The 2021-2029 Housing Element has been developed to meet California State legal requirement and is subject to review and certification by the State Department of Housing and Community Development (HCD).

Determination: Based on a review of the project as proposed, the Department of Fish and Wildlife has determined that for purposes of the assessment of CEQA filing fees (Fish & G. Code, § 711.4, subd. (c)) the project has no effect on fish, wildlife or their habitat and the project as described does not require payment of a CEQA filing fee. This determination does not in any way imply that the project is exempt from CEQA and does not determine the significance of any potential project effects evaluated pursuant to CEQA.

Please retain this original determination for your records. Local lead agencies are required to file two copies of this determination with the county clerk at the time of filing the Notice of Determination (NOD) after the project is approved. State lead agencies are required to file two copies of this determination with the Governor's Office of Planning and Research (i.e., State Clearinghouse) at the time of filing the NOD. If you do not file a copy of this determination as appropriate with the county clerk or State Clearinghouse at the time of filing the NOD, the appropriate CEQA filing fee will be due and payable.

Conserving California's Wildlife Since 1870

DocuSign Envelope ID: 0DF69336-14FD-457B-BDFC-755562EC46C1

Martin Reeder
National City
Page 2

Without a valid CEQA Filing Fee No Effect Determination form or proof of fee payment, the project will not be operative, vested, or final and any local permits issued for the project will be invalid, pursuant to Fish and Game Code section 711.4, subdivision (c)(3).

Approved by:

DocuSigned by:

*Jennifer Turner*Date: 3/17/2021

C3D449ECB7C14DE...

Signature

Jennifer Turner, Senior Environmental Scientist (Supervisory)

Name, Title

FOR COUNTY CLERK USE ONLY

Stamp or initial inside the box
to indicate acceptance of this
signed No Effect Determination
in lieu of a CEQA Document
Filing Fee.

County Clerk Stamp or Initial