



# City of Imperial Beach, California

OFFICE OF THE CITY MANAGER

825 Imperial Beach Blvd., Imperial Beach, CA 91932 Tel: (619) 423-8303 Fax: (619) 628-1395

MTS

August 3, 2023

The Honorable Michael T. Smyth  
Presiding Judge of the Superior Court  
San Diego Central Courthouse  
1100 Union Street, Tenth Floor  
San Diego, CA 92101

RECEIVED  
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PRESIDING

**RE: City of Imperial Beach Response to San Diego Grand Jury Report: "Housing in San Diego County"**

Dear Judge Smyth:

The City of Imperial Beach has reviewed the San Diego County Grand Jury report on *Housing in San Diego County* released on May 4, 2023. The report includes several findings and recommendations for local government. In accordance with State law, please accept the following responses to the findings and recommendations in the report that are applicable to the City of Imperial Beach.

**Finding 03:** The following cities did not meet their housing allocations for all income categories: Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, National City, Oceanside, Poway, San Diego, San Marcos, Santee, Solana Beach and Vista.

**Response:** The City of Imperial Beach concurs with **Finding 03**.

**Finding 05:** Specific plans are useful tools in spurring development, including housing development, and have been used by El Cajon and Chula Vista among others.

**Response:** The City of Imperial Beach concurs with **Finding 05**.

**Recommendation 23-01:** Consider, if they have not done so, using specific plans (as defined by the Governor's Office of Planning and Research) to facilitate the permitting and development of housing, particularly affordable housing, in their jurisdictions.

**Response:** The City of Imperial Beach concurs with Recommendation 23-01. Specific plans should be considered as one tool to implement planning objectives. The City of Imperial Beach has previously developed specific plans for hotel development and will consider specific plans for housing development. Currently, except for the Commercial/Recreation-Ecotourism Zone, the majority of all developable parcels within Imperial Beach allow for residential uses. Preparation of specific plans require substantial public input and careful consideration of coastal impacts, infrastructure, and land use compatibility.

**Recommendation 23-02:** Consider working with school districts and community college districts within their jurisdictions to identify developable land for housing owned by districts within their boundaries.



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**Response:** The City of Imperial Beach concurs with Recommendation 23-02. City staff will coordinate meetings with the local school districts within its jurisdiction (South Bay Elementary School District and Sweetwater Union High School District) to identify developable land for housing owned by districts within their boundaries.

**Recommendation 23-03:** Consider working with local religious institutions within their jurisdictions to identify land developable for housing, particularly affordable housing.

**Response:** The City of Imperial Beach concurs with Recommendation 23-03. During preparation of its 6<sup>th</sup> Cycle Housing Element, the City received correspondence from a local religious institution, St. James Lutheran Church, about potential development of affordable housing. The City encourages this type of development and has been facilitating meetings with this and other religious institutions. In November 2022, the City Council approved the entitlement of a 50-unit affordable senior citizen housing development and neighborhood center on a property that has historically been utilized by a religious institution, and the Imperial Beach Housing Authority will be considering an Affordable Housing Agreement with the developer to facilitate its construction.

**Recommendation 23-04:** Consider drafting revenue-generating legislation at the jurisdiction level, if feasible and legal e.g., the Seattle Jumpstart Tax. Monies generated by such a tax to fund or assist in funding the construction of housing, particularly affordable housing.

**Response:** The City of Imperial Beach does not support Recommendation 23-04. Pursuant to Article XIII C of the California Constitution, all local taxes must be approved by a vote of the electorate and cannot be imposed by local legislative action alone.

**Recommendation 23-05:** Consider providing legislative support to re-introducing in the State Legislature SB 1105, or similar legislation, to create a San Diego County agency that could raise revenue for housing.

**Response:** The City of Imperial Beach does not support Recommendation 23-05. Existing agencies or processes should first be modified, consolidated, and/or simplified to prevent additional administrative bottlenecks and duplication of effort that could hinder timely planned housing development.

**Recommendation 23-06:** Consider providing legislative support to SB4, which is currently before the legislature. This bill makes it easier to provide affordable housing on land owned by religious institutions.

**Response:** The City of Imperial Beach does not support Recommendation 23-06. The City maintains a Local Coastal Program and is required to analyze projects for coastal access and impacts. As such, the City desires to maintain local control so that adequate analysis of coastal impacts, infrastructure, and land use compatibility can be provided. It should be noted that SB4 would also allow by-right development on any land owned by independent institutions of higher education in addition to land owned by religious institutions.



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The City of Imperial Beach appreciates the work, findings and recommendations of the San Diego County Grand Jury on this important matter.

Sincerely,

A handwritten signature in blue ink that reads 'Tyler Foltz'.

Tyler Foltz, AICP  
Imperial Beach City Manager