



Staff Report

Agenda Item No. D-1

To: City of Imperial Planning Commission
From: Yvonne Cordero
Date: May 7, 2026
Subject: City of Imperial Community Development Permit Streamlining

Background

In October 2024, the Community Development Department was awarded a \$40,000 technical assistance grant through the 2021 Regional Early Action Planning (REAP 2.0) Grant Program administered by Southern California Association of Governments (SCAG). The grant supported updates to the City of Imperial's (City) community development regulatory framework, including development of visual guides and a targeted review of City documents to improve the clarity and accessibility of planning, building, engineering, and fire permit review processes.

Using REAP 2.0 grant funding, the City advanced a targeted Community Development Permit Streamlining effort to improve process clarity, reduce review delays, and better align local permitting practices with State housing law. Following a competitive procurement consistent with SCAG requirements, the City selected GHD, Inc. (Consultant) in November 2025 to prepare entitlement visual guides and develop implementation-ready streamlining recommendations consistent with the SCAG Scope of Work and REAP 2.0 program objectives starting in January 2026.

Discussion/Analysis

The City of Imperial Community Development Permit Streamlining project is intended to simplify and expedite development approvals through clear applicant guidance and streamlined permitting processes. The Community Development Permit Streamlining effort directly advances REAP 2.0 objectives by:

- Accelerating infill housing approvals through clearer, objective, and ministerial processing pathways;
- Supporting affirmatively furthering fair housing by reducing discretionary barriers that disproportionately affect affordable and special-needs housing;
- Reducing vehicle miles traveled (VMT) by facilitating infill and higher-density development consistent with the Housing Element;
- Improving interdepartmental coordination and applicant preparedness to reduce avoidable review delays.

The Consultant completed a comprehensive review of City planning and development regulations, including the Zoning Code, General Plan, 2021-2029 Housing Element and Annual Progress Reports, Downtown Imperial Redevelopment Master Plan and Design Guidelines, and applicable State Building Codes. This analysis evaluated consistency with evolving State housing law requirements and identified regulatory, procedural, and operational barriers affecting entitlement and permit processing timelines.

Complementing the regulatory review, City staff and the Consultant conducted structured stakeholder interviews with City departments, the Imperial County Fire Department, local developers, and the Imperial Valley Housing Authority to identify process bottlenecks and opportunities to improve permitting clarity and predictability. Stakeholder feedback indicated that development delays are driven more by process clarity and submittal quality than by regulatory standards alone. Key themes include:

- The need for clearer, front-loaded guidance and visual tools to improve application completeness
- Desire for predictable and coordinated review timelines rather than faster but uncertain processing
- Opportunities to reduce friction through unified, objective standards applied consistently across departments
- Recognition that delayed responses and fragmented reviews can create delays comparable to discretionary approvals

These findings reinforced the need for improved checklists, visual entitlement guides, consolidated review workflows, and early eligibility determinations; recommendations that are incorporated throughout the Consultant's report.

Based on a review of City policies, operational processes, and stakeholder input, the Consultant prepared a coordinated set of recommendations, including updates to policy documents, zoning and regulatory amendments, permitting and process improvements, and enhancements to the Community Development Department's webpage. Recommendations are sequenced for implementation and grounded in state law, resulting in a phased work program outlining near-term (0-12 months), mid-term (12-24 months), long-term (24+ months), and ongoing actions for City decisionmaker consideration.

Lastly, consistent with REAP 2.0 requirements and stakeholder input, the Consultant developed clear, illustrative visual guides documenting processes for both entitlement approval and post-entitlement review for key Planning, Building & Safety, Engineering, and Fire permit pathways related to housing and infill development, as identified in the RFP, including:

Planning

- Accessory Dwelling Units (ADU)
- Conditional Use Permits (CUPs)
- General Plan Amendments
- Site Plan Review
- Tentative Maps
- Variances
- Zone Changes

- Zoning Text Amendments
- Zoning Verification Letters

Building & Safety

- Building Permits

Engineering

- Final Maps
- Engineering Permits
- Encroachment Permits

Fire

- Site Plan Review for Single Family and Duplexes
- Site Plan Review Multi-Family, Commercial, and Industrial

All entitlement visual guides were developed to provide clear, jargon-free, step-by-step guidance throughout the development review process, from Pre-Application Review through building permit issuance and final inspections. The guides visually outline required approvals, submittal steps, and review milestones, and are provided as fillable PDFs to improve usability, support complete submittals, and reduce processing time and administrative workload for City staff. The Entitlement Visual Guides can be found in Appendix A of Attachment A - Community Development Permit Streamlining Background Research and Streamlining Recommendations Report.

Environmental Compliance

The project is categorically exempt from the California Environmental Quality Act (CEQA), per Section 15306, Class 6, which consists of basic data collection, research, experimental management, and resource evaluation activities that do not result in a serious or major disturbance to an environmental resource.

Recommendation

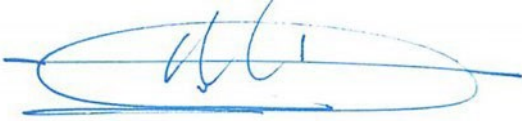
Staff recommends that the Planning Commission review the **City of Imperial Community Development Permit Streamlining Background Research and Streamlining Recommendations Report**, and **APPROVE** Resolution PC2026-06 (Attachment B), recommending City Council adopt and pursue implementation of the Community Development Permit Streamlining recommendations.

The Planning Commission's action is advisory and acknowledges completion of the REAP-funded analysis, forwarding the Community Development Permit Streamlining recommendations to the City Council for consideration. Approval does not enact ordinance amendments, but affirms policy support for the recommended direction, implementation sequencing, and use of the report to guide future code updates, administrative procedures, and process improvements.

Attachments

- Attachment A – City of Imperial Community Development Permit Streamlining Background Research and Streamlining Recommendations Report
- Attachment B – DRAFT Resolution PC2026-06

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Othon Mora', is written over a horizontal line. The signature is stylized and cursive.

Othon Mora, MCM, CBO
Community Development Director



City of Imperial Community Development Permit Streamlining

**Background Research
Permit Streamlining and Operational Recommendation Report**

May 1, 2026



➔ **The Power of Commitment**

Project name		City of Imperial Community Development Permit Streamlining					
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City of Imperial - Community Development Permit Streamlining

BACKGROUND RESEARCH REPORT

1. Executive Summary

This background report evaluates the regulatory landscape that affects the delivery of affordable housing in the City of Imperial and identifies opportunities to streamline processes to support more efficient housing production. The analysis focuses on local zoning standards, development requirements, environmental review practices, and alignment with state and federal housing mandates. The primary purpose is to pinpoint barriers that hinder development feasibility and recommend strategies to simplify, accelerate, and strengthen the City’s permitting and regulatory framework.

Key findings from the analysis include:

- The City has adopted several important incentives, such as density bonuses, fee waivers, ADU incentives, and expedited permit processing, that support affordable housing, but these tools are undercut by density limits, parking standards, and site development requirements that reduce feasible unit yields.
- Several local regulations do not fully align with evolving state housing laws, including recent mandates on ministerial approvals, supportive housing, and higher-density development, which create uncertainty and add administrative burden.
- The permitting and entitlement process contains procedural inefficiencies, including multi-step review pathways, discretionary approvals, and limited coordination between departments, all of which increase project timelines and costs.
- Infrastructure capacity constraints, CEQA review requirements, and site development standards (such as stormwater basins and off-site improvements) disproportionately affect affordable housing feasibility due to higher sensitivity to upfront costs.

Summary of Identified Barriers. The report identifies three primary categories of barriers affecting Imperial’s housing delivery:

1. **Regulatory and Policy Framework Constraints:** Development standards such as low-density ceilings, restrictive site and parking requirements, Conditional Use Permit requirements for multifamily and special-needs housing, and partial misalignment with current state housing mandates.
2. **Permitting and Approval Process Inefficiencies:** Reliance on discretionary approvals, limited ministerial or by-right pathways, fragmented interdepartmental coordination, and extended environmental review timelines that prolong entitlement and permitting.
3. **Cumulative Impacts on Project Timelines, Costs, and Feasibility:** Infrastructure extension obligations, stormwater requirements that reduce developable area, and development fees that disproportionately



affect lower-income and affordable housing products, compounding schedule risk and financial constraints.

These factors collectively reduce the feasibility of affordable housing projects, extend approval timelines, and constrain the City's ability to meet its long-term housing goals. Improvements in regulatory alignment, streamlined processing, and strategic policy updates will be essential to strengthening housing supply and reducing unnecessary development barriers.



2. Introduction

GHD's analysis combines regulatory research, technical review, and stakeholder engagement to assess the City's housing development environment. The approach includes:

- Reviewing local zoning, development standards, plans, and permitting procedures.
- Analyzing consistency with recent state housing legislation and federal requirements.
- Evaluating development feasibility implications, including density allowances, parking standards, infrastructure obligations, and environmental review pathways.
- Conducting interviews with City staff and development stakeholders to understand operational challenges and real-world delays.

This approach provides a comprehensive and practical understanding of both policy intent and implementation barriers.



3. Methodology

The document review assessed local regulatory materials including zoning provisions, the Housing Element, fee schedules, CEQA procedures, and development standards. State and federal statutes (e.g., SB 35/AB 423, SB 330/AB 130, SB 9, ADU regulations, and applicable HUD guidance) were also evaluated to assess regulatory alignment and identify areas requiring updates.

In parallel, the analysis was informed by stakeholder interviews with City staff across planning, engineering, and building functions; the Imperial County Fire Department; local builders and private developers; and the Imperial Valley Housing Authority to capture real-world implementation challenges, interagency coordination issues, and procedural bottlenecks not evident from code review alone. Insights from these discussions were used to supplement the policy analysis and better understand how regulatory requirements and day-to-day administrative practices affect project feasibility, approval timelines, and site capacity.

The combined policy and stakeholder analysis placed particular emphasis on density provisions, height limits, parking standards, entitlement pathways, infrastructure requirements, and cross-department review coordination, which stakeholders consistently identified as having the greatest influence on housing and affordable housing development in the City of Imperial.

4. Review of City of Imperial Local Regulations and Policies

4.1 Zoning Code

Residential Zoning Standards and Density Provisions

The City of Imperial’s Zoning Code establishes the core development metrics that govern residential density, building form, and site utilization, particularly within the Residential Condominium (RC) and Residential Apartment (RA) zones. Although these districts are intended to accommodate multifamily housing, several baseline zoning standards, including density limits, height caps, parking requirements, setback dimensions, and on-site infrastructure obligations, combine to constrain achievable unit yield and complicate infill development.

In practice, these metrics often limit the ability of projects to reach densities assumed in the Housing Element or to achieve the scale necessary to support affordable and workforce housing, increasing reliance on discretionary approvals and incentive programs. The following section evaluates these zoning metrics to identify how they currently discourage infill housing and where targeted adjustments could better align base zoning with housing production objectives while maintaining objective, state-law-consistent standards.

Table 4.1 Section 24.03.120 Property Development Standards: R Zones

A. General Requirements

The following requirements are minimums unless otherwise stated.

	RR	RL	R-1	RC	RA
1. Density-maximum units per net acre.	0.5-1.0	2.0	6.0	12-20*	20-30*
2. Net lot area (in sq. ft.)	1 acre	20,000	6,000	7,500	7,500
3. a. Lot width (in feet)	110	100	65	150 int. 70 corner	150 int. 165 corner
b. Cul-de-sac or odd shaped lot width (in feet)	30	30	30	-----	-----
c. Flag lots	20	20	20	-----	-----
4. Lot Depth (in feet)	150	150	100	100 int. 150 corner	165 int. 135 corner
5. Front yard setback	40	30	20	20	20
6. Side yard setback – each side (in feet)	20	15	5	15	10
7. Side yard setback – street side (in feet)	20	15	10	20	20
8. Rear yard setback (in feet)	50	40	10	20	10
9. Lot coverage, maximum	35%	35%	50%	50%	60%
10. Building and structure height (in feet)	35 feet or 2 stories, whichever is less				

Density: Nominal density allowances in the RC and RA zones may be undermined by required front, side, and rear yard setbacks that substantially reduce the usable building footprint on infill parcels. On constrained infill parcels with limited lot depth, which appear common in older areas of Imperial, these setbacks limit building width and depth, making it difficult for multifamily projects to physically accommodate the number of units permitted by the stated du/ac density, resulting in effective densities that fall well below what zoning technically allows.

Building Height: Imperial’s two-story height limits in multifamily zones restrict the ability to accommodate density through vertical construction, particularly on flat sites that are already served by infrastructure. When combined with setback requirements, height limits force projects to expand horizontally rather than stack units efficiently, which reduces achievable density and often prevents multifamily developments from reaching minimum unit thresholds necessary to support construction and financing.

Setbacks: When applied uniformly to multifamily development in the RC and RA zones, Imperial’s front, side, and rear setback requirements significantly contract the buildable envelope of infill sites, regardless of zoning designation. Combined with parking layouts and stormwater detention needs, these setbacks fragment site design, constrain building footprints, and limit efficient unit configuration, making it difficult to deliver feasible multifamily projects even where higher density is otherwise permitted.

Affordable Housing Incentives and Constraints

The City has adopted a range of zoning-based incentives to support affordable and mixed-income housing, including density bonuses, fee reductions or deferrals, expedited permit processing, flexible development standards, and by-right allowances for supportive and transitional housing. While these incentives demonstrate a clear policy commitment to housing production, their effectiveness is often limited by baseline zoning metrics, such as density caps, height limits, parking requirements, setbacks, and infrastructure obligations, that reduce achievable unit yield and site efficiency. As a result, incentive programs frequently offset underlying constraints rather than meaningfully expand development capacity, increasing reliance on concessions or discretionary relief. The following section summarizes existing affordable housing incentives alongside the zoning and development standards that influence their performance, providing context for evaluating opportunities to better align base zoning with the City’s housing objectives.

Incentives: The City has adopted a range of zoning-based incentives to support affordable and mixed-income housing, including density bonuses, fee reductions or deferrals, expedited permit processing, flexible development standards, and by-right allowances for supportive and transitional housing. While these incentives demonstrate a clear policy commitment to housing production, their effectiveness is often limited by baseline zoning metrics, such as density caps, height limits, parking requirements, setbacks, and infrastructure obligations, that reduce achievable unit yield and site efficiency. As a result, incentive programs frequently offset underlying constraints rather than meaningfully expand development capacity, increasing reliance on concessions or discretionary relief. The following section summarizes existing affordable housing incentives alongside the zoning and

development standards that influence their performance, providing context for evaluating opportunities to better align base zoning with the City’s housing objectives.

Incentive	Detailed Description	How It Supports Affordable Housing
Density Bonus Program	Allows developers to exceed maximum zoning densities when including affordable units. Provides up to four concessions (e.g., reduced parking, increased height, modified open space).	Enables more units per project, lowers per-unit land cost, and increases feasibility for affordable housing developments.
Land Write-downs & Financial Subsidies	City uses CDBG/HOME funds to reduce the cost of land, support site acquisition, or subsidize infrastructure improvements. May also support relocation, demolition, or clearing of sites.	Reduces upfront cost barriers for affordable housing developers and makes lower-income projects more financially viable.
Lot Consolidation Incentives	Encourages combining small parcels into larger development sites through incentives such as reduced fees, higher density allowances, reduced parking, increased height, or flexible setbacks.	Makes multifamily feasible on small infill parcels and increases production capacity for affordable units.
Fee Reductions / Fee Deferrals	City evaluates opportunities to reduce, waive, or defer development impact fees for affordable projects. ADU Fee Waiver Program eliminates certain fees for income-restricted ADUs.	Lowers total development costs and directly incentivizes small-scale low-income rental production.
Expedited Permit Processing	Affordable and multifamily housing receive priority processing. City aims to complete project permitting within ~180 days per SB 330. Includes faster site plan review and coordination.	Reduces holding and financing costs for developers; shortens overall project timelines, increasing project feasibility.
Flexible Development Standards	Offers flexibility in height, setbacks, lot coverage, and parking requirements—particularly for multifamily zones (RC, RA). Supports sliding-scale parking standards tied to unit type.	Allows higher-density, lower-cost building types and removes regulatory barriers that limit affordable housing design.
Supportive & Transitional Housing Incentives	In compliance with AB 2162, supportive housing is permitted by right in zones allowing multifamily/mixed-use. Parking reductions apply for sites within ½ mile of transit.	Removes discretionary barriers, enabling faster production of supportive and transitional housing for vulnerable residents.

Accessory Dwelling Unit (ADU) Incentives	Updated ordinance allows ADUs/JADUs by-right with 60-day review, no replacement parking in transit-adjacent areas, fee waivers for units under 750 sq. ft., and elimination of owner-occupancy requirements.	Produces naturally affordable units and increases gentle-density infill across established neighborhoods.
Developer Assistance & Technical Support	City provides pre-application meetings, site identification, letters of support, guidance on state/federal funding (HOME, CDBG, USDA, LIHTC), and coordination with special-needs housing developers.	Helps developers secure funding, lowers administrative burden, and encourages more affordable housing proposals.

Constraints: The City of Imperial’s zoning code and development standards present several constraints that limit the feasibility and production of affordable and multifamily housing. Governmental barriers, including low density ceilings, height caps, parking requirements, Conditional Use Permit triggers, CEQA costs, and development fees, interact with non-governmental factors such as rising construction costs, variable land prices, and limited developer interest. Infrastructure and environmental requirements, like mandatory stormwater retention and costly utility extensions, further reduce developable land and increase upfront costs. The following table summarizes these principal constraints and their impacts on housing production, timelines, and affordability in Imperial.

Constraint Category	Specific Constraints	Impact on Housing Production
Governmental	<ul style="list-style-type: none"> • Low density limits (max 30 du/ac for multifamily and max 6 du/ac for single family) • 2-story height caps • High parking requirements (2 covered spaces for single family and 1-2 for apartments) • CUPs for multifamily & special-needs housing • CEQA costs and time • Development fees (≈ \$4–5.5k/unit) 	Reduces feasibility of affordable and multifamily housing; increases project costs and timelines; limits higher-density options.
Non-Governmental	<ul style="list-style-type: none"> • Rising construction costs • Land prices ranging widely (\$16k–\$1.7M/acre) • Limited developer interest in small markets • Weak access to home improvement financing 	Constrains production of new units; slows rehabilitation of older homes; depresses market competitiveness.

<p>Infrastructure & Environmental</p>	<ul style="list-style-type: none"> • Mandatory stormwater retention basins • Infrastructure extension costs (water, sewer, roads) • Compliance with Title 24 & RCAP • Limited infill capacity in some areas 	<p>Decreases developable land area; increases upfront costs; discourages higher-density projects; reduces affordability.</p>
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4.2 Overlays and Special Districts

Planned Unit Development (PUD) Overlay Zone

The City’s PUD overlay may be applied over an underlying base zone to allow flexibility in site planning and development standards where a unified project design is proposed. The PUD overlay allows a mix of residential housing types (single-family, townhomes, apartments, condominiums, manufactured homes) at densities of up to 30 dwelling units per acre, subject to discretionary approval and modification of development standards.

Substantial portions of the PUD overlay are not current compliant with state law because they rely on discretionary approvals, subjective judgments, or conditional findings, all of which are expressly prohibited. As PUD’s are not by-right zoning districts, establishing one may likely require a rezoning application, community engagement, Planning Commission recommendation and City Council approval via public hearings, SB 35 projects cannot be required to obtain PUD zoning, and PUD procedures are preempted where the underlying zoning already permits residential use.

The PUD provisions repeatedly conditions approval on qualitative judgments including “superior design”, “exceptional architectural design”, “higher standards of integrated design and amenity”, “varied building massing”, and “quality and interconnectedness of common space”. These provisions are unenforceable under current state law. Moreover, the open space provisions identify an objective requirement of 15%-20%, but it authorizes the Planning Commission or City Council to require more or less open space at its discretion or determine whether open space is adequate to achieve “superior design”. Because the amount, configuration, and acceptability of open space are not fixed or measurable, these requirements are non-objective and preempted by state law.

Specific Plan (SP) Overlay

The Specific Plan Overlay Zone (SP) is designed to promote orderly growth, efficient land use, coordinated infrastructure delivery, and high-quality development outcomes that cannot be achieved through standard base zoning alone. At the core of the SP zone is an approved Development Plan and Development Plan Text, which together function as the controlling regulatory document for the area. The Development Plan defines allowable land uses; establishes densities, intensities, and development patterns; identifies infrastructure and circulation systems; and sets forth phasing schedules and implementation measures.

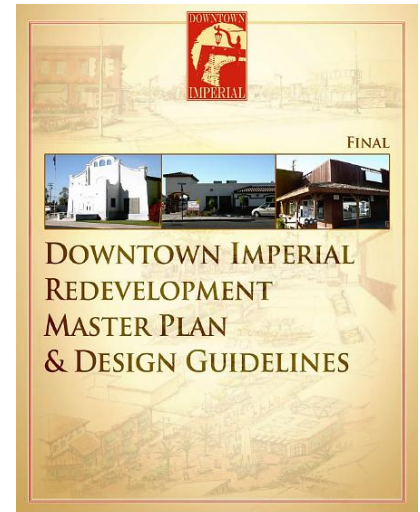
The SP as a regulatory framework, specifically for multifamily residential and mixed-use residential projects, is largely incompatible with state law due to its discretionary nature. Establishment of a SP requires a zoning map amendment, Planning Commission recommendation, and City Council approval which is prohibited for multifamily

residential and mixed-use residential projects as state law expressly prohibits jurisdictions from requiring rezoning or legislative action as a condition of approval.

4.3 Downtown Imperial Redevelopment Master Plan and Design Guidelines

The Downtown Imperial Redevelopment Master Plan (“DIRMP”) core objective is to stimulate economic revitalization while preserving Imperial’s small-town identity and historic character. Downtown Imperial is envisioned as a pedestrian-friendly, mixed-use center featuring local retail, dining, housing, civic uses, public spaces, and community events. The Plan focuses on the Downtown core between 4th–11th Streets and E–K Streets, anchored by Imperial Avenue and Barioni Boulevard.

The DIRMP was adopted in 2006, well before the enactment of SB 35 in 2017. Accordingly, it was not drafted to implement or align with state housing streamlining laws. Today, however, it functions as a local policy and design framework that must be applied in a manner consistent with state law.



Prepared as a visioning document to guide the planning and design of development within its study area, the DIRMP includes comprehensive commercial, residential, and signage design guidelines intended to promote high-quality development while allowing for architectural diversity. These guidelines emphasize traditional and regionally appropriate architectural styles; transparent storefronts, durable materials, and pedestrian-scaled signage; and compatibility with historic structures and adjacent residential neighborhoods.

Despite these objectives, many provisions rely on broad, interpretive, and non-objective language such as “encouraged,” “should,” or “compatible with surrounding character”, as well as subjective aesthetic judgments regarding “quality,” “authenticity,” or “appropriateness.” For example, DIRMP Section 1.3 (Architecture) states: “In order to scale down facades that face incompatible uses, it may be desirable to set back portions of the upper floors of new multi-family buildings.” As written, this provision is inherently subjective and reasonably interpreted as advisory rather than mandatory, and therefore unenforceable under SB 35. Such language is not compliant with current state law and its standards cannot be applied to SB 35-eligible projects.

4.4 Building Codes

Applicability of Local Building Codes to Affordable Housing.

Affordable housing developments in the City of Imperial are subject to the same building regulations as all other residential developments, regardless of affordability level, tenure, or funding source. The City’s Building Regulations, codified in Chapter 6 of the Imperial Municipal Code, apply uniformly to all buildings and structures that are constructed, altered, or occupied within the City limits. These regulations include, but are not limited to, the following:

- California Building Code
- California Residential Code



- California Electrical, Mechanical, and Plumbing Codes
- California Energy Code
- California Green Building Standards Code (CALGreen)
- California Fire Code
- California Historical Building Code

Affordable housing projects must comply with these standards on an equal basis with market-rate housing. However, although uniform application of safety standards is required by state law, Title 24 energy efficiency and green building mandates can materially increase construction costs, particularly for multifamily and lower-cost housing developments. And currently, the City does not currently provide local offsets, such as alternative compliance pathways, local flexibility programs, or technical assistance, to help affordable housing projects manage the cost impacts of these requirements.

Mandatory CALGreen standards require water efficiency measures, energy-efficient systems, material recycling, and construction waste diversion. While these standards advance sustainability goals, they can increase upfront construction costs and require specialized materials or consultants.

Compliance with the California Fire Code, including requirements related to fire-resistant construction materials, fire sprinkler systems, fire access and apparatus clearance, and fire separation distances may influence building design, density, and site layout. While these standards are required by state law, their interaction with local site conditions and zoning constraints may compound development challenges for affordable housing.

Building permit fees are calculated based on construction valuation, including labor, materials, overhead, and profit. Because affordable housing projects often consist of larger multifamily buildings with higher total valuations, associated permit and plan-check fees may be substantial. To partially mitigate these costs, the City of Imperial permits fee deferrals on a limited, temporary, and discretionary basis, subject to approval by the City Manager.

Affordable housing projects are subject to standard plan review, inspection, and approval procedures administered by the Building and Safety Division. The City does not currently provide priority or expedited plan review for affordable housing, dedicated staff review tracks, or guaranteed review timelines specific to affordable housing projects. Extended plan-check cycles, correction rounds, or re-inspections can delay construction schedules and increase carrying costs, which may disproportionately affect affordable housing projects.

Parking and Design Requirements

The City requires off-street parking for all residential development in accordance with Zoning Ordinance Sections 24.03 (Residential Zones) and 24.13 (Off-Street Parking). For single-family residential development (RR, RL, and R-1 Zones), a minimum of two (2) off-street parking spaces per dwelling unit is required. These spaces must be covered, typically within a garage or carport.



For multi-family residential development in the RC (Residential Condominium) and RA (Residential Apartment) Zones, parking requirements are based on unit size:

- Studio or one-bedroom units: 1.0 covered parking space per unit
- Two-bedroom units: 1.5 parking spaces per unit, with at least one space covered
- Three-bedroom units: 2.0 parking spaces per unit, with at least one space covered

Carports may be approved to satisfy covered parking requirements in the RC and RA Zones, subject to Planning Commission approval.

Residential parking requirements in the City of Imperial are expressed as numerical, dimensional, and quantifiable standards that are compliant with provisions of SB 35 as they are objective and ministerial.

Current parking requirements consume valuable land area, increase construction costs, and often limit achievable density more than other zoning standards. These impacts are especially pronounced for affordable and workforce housing, where parking demand is typically lower.



5. Review of State and Federal Regulatory Framework

5.1 California State Housing Requirements

Housing Element Law Consistency and Compliance.

Overall, the City’s 2021–2029 6th Cycle Housing Element Update, adopted in February 2022, generally complies with the statutory content and procedural requirements set forth in Government Code Sections 65580 through 65589.11, which govern the preparation, adoption, and review of housing elements statewide. The Housing Element addresses the required components, including an assessment of housing needs, an inventory of sites adequate to accommodate the City’s Regional Housing Needs Allocation (RHNA), an analysis of governmental and non-governmental constraints, and a program of policies and actions intended to facilitate the development, rehabilitation, and preservation of housing for all income levels during the planning period.

For the 2021–2029 Housing Element Update, the Southern California Association of Governments (SCAG) assigned Imperial a Regional Housing Needs Allocation (RHNA) of 1,601 housing units, distributed across the following income categories:

Extremely Low	352
Very Low	352
Low	346
Moderate	294
Above Moderate	257

The 1,601-unit RHNA assigned for the 2021–2029 planning period represents an increase of 292 units compared to the City’s 5th Cycle Housing Element (2014–2021), which had a RHNA of 1,309 units. According to June 2021 Housing Element data, the City approved approximately 90 percent of its 5th Cycle RHNA allocation during that planning period.

A review of the policies and programs set forth in the City’s 2021–2029 Housing Element Update indicates that the City is currently not in full compliance with state housing law in several areas. These areas of non-compliance relate to the implementation, updating, or effectiveness of specific policies and programs, including the following:

1. ADU procedures and processing
2. By-right supportive and transitional housing
3. Density bonus codification
4. Reasonable accommodation procedures
5. Removal of discretionary approvals at max density
6. Parking reform near transit stations



SB 35 / SB 423 (Ministerial Approval)

Both charter and non-charter cities, including Imperial, are subject to SB 35, which requires qualifying housing projects to be approved ministerially (by-right), without conditional use permits, discretionary approvals, or public hearings, and reviewed only against objective planning standards. Cities must follow streamlined review timelines and a clear eligibility determination process. SB 35 also limits parking requirements, generally to no more than one space per unit (and sometimes zero, depending on transit or site conditions), overriding stricter local standards. SB 423, effective January 2024, extends and expands SB 35, continuing ministerial approval (generally without CEQA review) for eligible projects with required affordable units and extends the program through January 1, 2036.

Current Code Compliance: A review of the City’s existing Zoning Code indicates that, despite being relatively outdated, it contains many standards that are already written in an objective manner. For example, dimensional standards for residential zones, such as lot area, width, depth, setbacks, lot coverage, and height, are largely numeric and therefore objectively verifiable. Likewise, the Zoning Code’s Use Tables (including the Permitted and Conditional Uses tables) clearly identify which uses are permitted (“P”), conditionally allowed (“C”), or prohibited (“X”), providing useful clarity when assessing baseline zoning consistency. However, in some instances, the use of conditional designations within these tables may conflict with the ministerial approval requirements of SB 35.

Areas of Non-compliance:

- Section 24.01.130 - Repeal of Conflicting Ordinances. SB 35, as state law, preempts inconsistent local ordinances. While Section 24.01.130 addresses conflicts among City ordinances, its *“this governs”* language may contribute to misapplication where a local standard conflicts with SB 35’s ministerial and objective approval requirements.
- Section 24.01.150 - Clarification of Ambiguity. SB 35 requires eligible projects to be processed ministerially and not be subject to discretionary approvals. Section 24.01.150 directs that ambiguities be resolved through Planning Commission recommendation and City Council approval. If an SB 35–eligible application is deemed *“ambiguous,”* this process could function as a discretionary chokepoint inconsistent with ministerial review.
- Section 24.01.170(B) - Actions Deemed a Nuisance. While not explicitly imposing a discretionary permit requirement, this provision could be applied to treat residential uses as unlawful absent discretionary entitlement approvals (such as CUPs for ADUs or boarding housing in the RC and RA zones), creating potential conflict with ministerial approval requirements.

SB 330 / AB 130 (Housing Crisis Act, Permit Streamlining Act)

Enacted in January 2020, SB 330 was adopted to stabilize residential development standards during the ongoing housing shortage by generally freezing zoning and development regulations at the time a preliminary or complete application is submitted and prohibiting more restrictive requirements thereafter. The statute also limits housing projects to no more than five discretionary hearings, restricts post-submittal fees or exactions, and streamlines approvals. City records show that between 2024 and 2025, CUP development applications required an average of

approximately 1.5 Planning Commission hearings to reach a recommendation or approval. Enacted in June 2025, AB 130 further strengthens these protections by expanding SB 330 and requiring approval of housing projects that comply with applicable objective standards, allowing denial or density reduction only upon specific written findings supported by evidence.

- An assessment of Imperial’s Zoning Code indicates that, in its current form, the code is generally consistent with the requirements of SB 330 and AB 130. The City’s development controls rely largely on numerical, measurable, and objectively defined standards that are published and applied uniformly. This structure aligns with SB 330’s requirement that applicable standards be fixed at the time of application submittal and with AB 130’s mandate that housing projects complying with objective standards be approved
- Several procedural provisions in Imperial’s Zoning Code already establish clear decision-making timelines, including a 15-day determination period for Site Plan Review and a requirement that action on a Conditional Use Permit occur within 30 days of the close of the public hearing. These deadlines help prevent the open-ended delays the Legislature sought to curb through SB 330. In addition, the City’s allowance for concurrent hearings on Conditional Use Permits and Zone Changes supports SB 330’s objective of minimizing redundant and sequential review processes.
- Areas where the current zoning code may challenge the intent of SB 330 and AB 130 include entitlement processes, such as Conditional Use Permits and Site Plan Review, that allow project denial or modification based on subjective criteria, including “compatibility,” “harmony,” or “neighborhood character.”

SB 9 (Urban Lot Splits and Duplexes)

Senate Bill SB 9, effective January 2022, requires ministerial approval for either the development of up to two primary dwelling units on a single-family lot, the subdivision of a single-family parcel into two lots, or both, potentially enabling up to four dwelling units on land previously limited to one home. The law restricts local review to objective zoning, subdivision, and design standards and prohibits discretionary approvals or public hearings. Unlike SB 35, which streamlines approval of larger multifamily or mixed-use projects in jurisdictions that are not meeting housing production targets, SB 9 is intended to facilitate small-scale, by-right infill development within existing single-family neighborhoods.

- While the City’s zoning and subdivision codes include multiple discretionary mechanisms, SB 9–eligible projects must be processed ministerially, without discretionary approvals or public hearings, and reviewed solely against objective zoning, subdivision, and design standards. Subjective criteria (neighborhood compatibility, harmony, or character) may not be used to deny or condition an SB 9 project. SB 9 also affects the City’s subdivision procedures in Chapter 20 of the Imperial Municipal Code, which currently require tentative maps, discretionary findings, and Planning Commission and City Council action; qualifying “urban lot splits” must instead be processed ministerially.

Accessory Dwelling Unit (ADU)

California’s current ADU statutes (Gov. Code §65852.2) regulating ADU development mandate that:



1. ADUs and Junior Accessory Dwelling Units (JADUs) must be approved administratively; cities may not require discretionary permits or hearings.
2. Local agencies are prohibited from imposing owner-occupancy requirements on any ADU, regardless of permit date.
3. Cities may apply only objective development standards; subjective findings are prohibited.
4. ADUs are deemed consistent with zoning and general plans and do not count toward density limits.
5. Cities must allow at least 800-square foot ADUs regardless of FAR/lot coverage, and may allow up to 1,200 square feet.
6. Parking is capped at one space per unit or bedroom and is waived entirely in many circumstances.
7. ADUs may be rented for 30 or more days at a time; separate sale may be restricted.

Imperial's Zoning Code currently regulates accessory dwelling units under the antiquated classification of a "Second Single-Family Dwelling with Kitchen." As written, such units are permitted only through approval of a Conditional Use Permit in all residential zones (RR, RL, R-1, RC, and RA), require owner-occupancy for the duration, and limit detached units to a maximum size of 640 square feet. These provisions are inconsistent with, and preempted by, current California ADU law. Accordingly, the City's zoning regulations governing ADUs are non-compliant with state ADU legislation and unenforceable to the extent they impose discretionary approval, owner-occupancy requirements, or sub-state minimum size limitations. According to City Housing Element data, only six (6) building permits were issued for ADUs between 2013 and 2020.

CEQA Streamlining and Exemptions Relevant to Housing

Recent changes to California law significantly limit the application of CEQA to qualifying housing projects and directly affect how residential development may be processed in Imperial.

- Small-scale residential projects (ADUs, SB 9 two-unit developments and urban lot splits) are approved ministerially and are not subject to CEQA. This substantially reduces approval timelines and litigation risk for incremental residential development within existing neighborhoods.
- Larger multifamily housing projects in Imperial may also qualify for statutory or categorical CEQA exemptions. Projects located on urban infill sites that are consistent with the General Plan and zoning regulations may be exempt under the Class 32 Infill Development Exemption, provided they do not result in significant impacts related to traffic, noise, air quality, or public services
- SB 35 provides CEQA streamlining for qualifying multifamily housing projects in jurisdictions that are not meeting their RHNA.
- AB 130 created a new statutory CEQA exemption for qualifying urban infill housing development projects.



5.2 Federal Regulations and Guidance

The Federal Department of Housing and Urban Development (HUD) guidelines shape who can be served (income targeting), what rents can be charged (affordable rent setting), and how projects must be documented and delivered (federal compliance and reporting).

- The Federal government's affordable housing framework via the U.S. Department of Housing and Urban Development (HUD) primarily affects Imperial housing development through (1) eligibility rules tied to HUD income limits, (2) rent restrictions and affordability periods, and (3) compliance requirements attached to federal funding sources.
- For local jurisdictions like Imperial, the most relevant HUD-connected capital sources are typically the HOME Investment Partnerships Program (HOME) and the Community Development Block Grant (CDBG) program which can be especially impactful when paired with other sources (e.g., using CDBG for infrastructure/utility upgrades or rehab programs that improve feasibility for infill housing and preservation projects).
- HUD's rental assistance tools, especially Project-Based Vouchers (PBVs) and Project-Based Rental Assistance (PBRA), can be decisive for making affordable developments financially viable where achievable rents are low relative to construction costs.

6. Regulatory Alignment and Gaps Analysis

The City of Imperial’s regulatory framework reflects intent and progress toward compliance with California housing mandates, but full alignment has not yet been achieved. Alignment is considered partial because, while certain state-required housing provisions are incorporated into local policy and practice, other elements of the Zoning Ordinance and development review process continue to rely on outdated standards or discretionary mechanisms that are inconsistent with current state law.

First, the City has made meaningful progress in areas such as Accessory Dwelling Units (ADUs) and density bonus implementation. ADUs are permitted in residential zones, and higher-density zoning districts (RC and RA) support multifamily development and the application of Density Bonus Law. These provisions indicate baseline compliance with state requirements and demonstrate the City’s willingness to facilitate housing production through zoning allowances and incentives.

However, partial alignment is evident because many of these state-mandated allowances are implemented within a broader zoning framework that still constrains feasibility. Density ceilings in residential zones—particularly the 30 du/ac maximum in the RA zone and 20 du/ac in the RC zone—may be insufficient to support lower-income housing at the densities assumed in the Housing Element. Height limits, parking requirements, and site development standards further limit the ability of projects to fully utilize density bonus incentives, resulting in functional constraints even where compliance exists on paper.

Additionally, ministerial approval pathways required under state law are not consistently reflected across the Zoning Ordinance. While some housing types are permitted by right, others, particularly certain multifamily or special-needs housing developments, may still be subject to discretionary approvals such as Conditional Use Permits or site plan review. These discretionary processes introduce uncertainty and delay that conflict with state mandates favoring objective, ministerial review for qualifying housing projects.

The adopted 2021–2029 Housing Element Update acknowledges these gaps by identifying the need for future zoning amendments, procedural updates, and streamlining actions to ensure consistency with evolving state housing law. The existence of these planned actions confirms that the City recognizes areas where local regulations lag behind state requirements, reinforcing the conclusion that alignment is ongoing rather than complete.

In summary, Imperial’s regulatory framework reflects partial alignment because:

- The City permits key housing types and incentives required by state law, but
- Development standards and approval processes still limit feasibility and predictability, and
- Additional zoning and procedural updates are necessary to fully implement ministerial approval, objective standards, and housing capacity assumptions required under state mandates.
- Areas of misalignment or regulatory conflict
- Implications for affordable housing delivery

7. Identification of Barriers and Development Delays

Based on city document research and stakeholder input, this section details the principal procedural and operational findings that explain recurring development delays within the City’s permitting and review processes.

Permitting delays are driven primarily by unclear upfront guidance and fragmented review workflows, not regulatory standards, resulting in incomplete submittals, repeated corrections, manual coordination (especially with Fire), and longer, less predictable approval timelines that increase staff workload and project costs.

The following table summarizes common regulatory and procedural barriers, associated permitting inefficiencies, and their cumulative impacts on timelines and costs, as described by current city staff members and the Imperial County Fire Department (ICFD).

Common Regulatory & Procedural Barriers	Permitting & Approval Process Inefficiencies	Cumulative Impacts on Project Timelines & Costs
Regulations are not viewed as the main barrier; delays are driven more by <i>process clarity and submittal quality</i> than by the underlying code requirements	Fragmented review workflow: applications are entered into the City system and routed internally, but some reviews require additional manual coordination.	Incomplete submittals extend timelines across all departments, triggering iterative correction cycles and resubmittals.
Applicants often don’t understand what permit is needed or what triggers additional permits/reviews (e.g., engineering, grading/fire)	County Fire reviews occur outside the City’s permitting platform (email/PDF), creating an external, non-integrated workflow.	Email-based, non-integrated fire review can become the critical path, lengthening overall permit issuance time.
Lack of standardized, public-facing checklists for common project types (e.g., patios, room additions, ADUs; grading, encroachment, civil improvements; fire plan requirements)	Heavy reliance on email contributes to tracking problems and version-control issues for plans and comments.	Manual tracking and redundant communication add “hidden” duration (waiting for confirmations, re-sending plans, reconciling versions, ensuring conditions are communicated).
Incomplete/insufficient site plans are common, including missing dimensions, scale, and essential details, often tied to limited applicant capability or understanding.	System functionality gaps (e.g., comments not consistently bundled/attached and conditions not reliably carried forward), requiring manual follow-up.	Greater uncertainty and reduced predictability for applicants and staff—stakeholders emphasized predictability as a priority over speed.
Hand-drawn plans are accepted, which can increase clarification needs and correction cycles when basic elements are missing (foundation, framing, MEP, site plan details)	Redundant internal steps (e.g., reviewers separately notifying counter staff after completing reviews) increase handoffs and delay risk.	Increased staff workload and opportunity cost, as time is diverted from substantive review to troubleshooting, applicant coaching, and repeated follow-ups.
Applicants face practical “how-to” barriers (how to prepare a site plan, where to get required documents, which professional to contact, who in the City to talk to).	Prioritization pressures: engineering review timing varies due to emergency utility work and urgent safety-driven projects, affecting predictable throughput.	Higher applicant carrying costs and soft costs associated with prolonged approvals (extended project schedules driven by corrections and review delays).
Access and usability constraints for electronic submittals, especially for older residents or applicants without	High staff time spent on applicant assistance (particularly for homeowners/non-professional	

reliable email access, create procedural friction.	applicants), making intake functional but staff-intensive	
	Fire review is frequently the longest due to both incomplete submittals and the Fire Department's regional workload across jurisdictions.	

The following table synthesizes regulatory and procedural issues identified by representatives from the Imperial Valley Housing Authority (IVHA) outlining related process inefficiencies and their potential cumulative effects on housing project timelines, coordination, and financial feasibility.

Upstream Coordination & Policy Constraints	Process Gaps & Coordination Challenges	Implications for Project Feasibility, Timing & Predictability
Overall, IVHA participants did not identify City entitlement or permit review timelines as a primary constraint on recent Imperial	The primary gap identified was not review speed, but the absence of a simplified, public-facing roadmap explaining how projects move from concept to occupancy.	Streamlined guidance and clearer process documentation represent the greatest opportunity to reduce avoidable delays for IVHA-supported projects.
IVHA typically engages in projects as a funding or subsidy partner rather than a development lead, limiting	Limited direct interaction with City review processes means IVHA insights are often relayed indirectly through sponsors or developers rather than through a consistent coordination channel.	Reduced opportunity to identify process improvements early or transfer lessons learned consistently across projects, particularly when sponsors vary.
Affordable housing projects supported by IVHA are often subject to layered funding requirements	Misalignment between multiple funding program requirements can create administrative complexity and timing challenges that extend beyond City review processes.	Schedule risk is concentrated around funding coordination and close-out, which can delay occupancy or project activation even after construction completion.
Stakeholders emphasized the need for clear, front-loaded guidance on approval sequencing	Without a documented, step-by-step process map, sponsors may encounter late-stage requirements or misjudge prerequisite approvals.	Increased risk of rework, soft-cost escalation, and schedule extensions; predictability was consistently identified as more valuable than faster review.
IVHA stakeholders noted uncertainty around the availability and use of minor administrative relief tools (e.g., small deviations	Lack of clarity regarding when administrative relief may be available versus when a formal variance is required can lead to incorrect or conservative application strategies.	Minor design constraints may escalate into avoidable delays or discretionary review pathways, affecting feasibility without materially improving outcomes.
Pre-application and recurring coordination meetings were viewed as generally beneficial,	Where used, recurring coordination improves alignment among agencies and partners; where absent, coordination tends to be ad hoc and reactive.	Structured early coordination reduces downstream surprises and helps stabilize schedules across planning, construction, and lease-up phases.
Fee timing and payment deferral of certain City fees	When fee timing policies are unclear or addressed late, sponsors may face uncertainty in cash-flow planning and financing assumptions.	Greater clarity around fee timing can improve financial feasibility and competitiveness of affordable projects without reducing City oversight or revenue certainty.

The following table synthesizes regulatory and procedural issues identified by private developers including Pacific West Development, highlighting process inefficiencies and their cumulative effects on project timelines, coordination, and development feasibility.

Developer-Identified Process and Coordination Challenges	Permitting and Approval Workflow Limitations	Cumulative Effects on Project Schedules and Cost
For new projects, early entitlement and planning processes are perceived as slow moving, with limited follow-up or urgency.	Review pathways for entitlements and early approvals lack momentum and consistent status updates, resulting in avoidable idle time between steps.	Longer pre-construction durations increase carrying costs and create scheduling uncertainty that affects financing and delivery.
Limited clarity on entitlement steps and what the realistic timeline will be.	Inadequate upfront guidance and weak expectation-setting contribute to misaligned schedules and repeated follow-ups by applicants to understand where items sit.	Reduced predictability undermines planning for consultants, contractors, and capital partners; timeline risk increases
Plan check durations regularly exceed what is communicated or anticipated.	Plan checks extend beyond stated timeframes with limited proactive communication; review cycles become longer and harder to manage.	Delays add direct soft costs (extended consultant time) and indirect costs (construction escalation and financing impacts)
Difficulty obtaining timely responses from City staff via email/phone/text.	Communication latency becomes a functional bottleneck—questions, clarifications, and next-step confirmations sit unresolved for extended periods.	Projects stall and decision-making slows, increasing developer time and cost exposure; respondent noted “tons of money” lost due to delays.
Projects tend to stall at entitlements, plan check, and Planning Commission/City Council approvals, especially when schedules shift.	Approval sequencing feels drawn out and subject to shifting timing; delays compound when downstream steps depend on upstream hearings/reviews.	Extended approval schedules increase holding costs and complicate financing coordination and construction start timing.
Desire for more realistic timing expectations, not optimistic targets that aren’t met.	Lack of credible schedule commitments creates repeated status requests and re-planning across teams.	Predictability improvements would reduce risk; developer prioritizes knowing actual durations over nominal speed.
Housing projects face heightened exposure to long or uncertain approvals.	When approvals stretch, housing underwriting and coordination with lenders/investors becomes more difficult due to changing timelines and assumptions.	Increased holding/financing costs and elevated project risk; delays can materially affect feasibility.
Third-party plan checking performance is viewed as a lever for improvement of timeframes and accuracy.	Weak accountability for consultant plan check turnaround and comment quality can increase cycles and rework.	Longer correction cycles increase soft costs and delay permit issuance; uncertainty ripples into construction scheduling.
Need for clearer points of contact and improved developer–City coordination.	Without defined communication norms and escalation paths, issues linger and become schedule drivers.	Stronger coordination reduces avoidable stalls and helps stabilize project delivery timelines.



City of Imperial - Community Development Permit Streamlining

PERMIT STREAMLINING AND OPERATIONAL RECOMMENDATIONS REPORT

1. Purpose of Recommendations

This section offers practical, implementation-level guidance to help the City of Imperial streamline zoning, permitting, entitlement, and review procedures in accordance with current California housing law. The recommendations are designed not only to reduce barriers to affordable housing production, but also to enhance efficiency across related areas such as entitlement processes, user guides, general plan and housing element updates, and website improvements. Each recommendation is actionable for City staff and intended for use in ordinance revisions, administrative procedures, and staff guidance, with the overarching goal of making processes easier for both the public and staff and supporting the City's efforts to accelerate and simplify all steps involved in housing and development review.

Each recommendation is structured to answer four questions:

1. What is the City doing today?
2. What does state law or guidance require instead?
3. What exactly must change in the Municipal Code or procedures?
4. How should staff implement and administer the change?

2. Streamlining and State Law Framework

California housing law requires cities to remove discretionary barriers, rely on objective standards, and process qualifying housing projects ministerially. Where local requirements conflict with state law, state law preempts the local requirement.

At a minimum, City processes should ensure that qualifying projects are:

- Reviewed and approved without conditional use permits, rezones, or public hearings when state law requires ministerial processing.
- Evaluated only against objective planning and design standards.
- Processed within the applicable statutory timelines and with clear, early eligibility determinations.
- Provided a written, objective basis for any denial or modification, consistent with state law limitations.

Table 2-1. Housing Processing Pathways (Ministerial vs. Discretionary)

Project Type	Approval Type	Key City Actions	Common Pitfalls to Avoid
ADU / JADU	Ministerial (Administrative)	<ul style="list-style-type: none"> • Use a dedicated checklist • Confirm objective standards • Issue decision within the statutory review window • Cannot require hearings 	<ul style="list-style-type: none"> • Do not require CUPs, owner-occupancy, or subjective findings
SB 9 Duplex / Urban Lot Split	Ministerial (Administrative)	<ul style="list-style-type: none"> • Confirm eligibility using an objective checklist • Apply only objective standards • Process subdivision ministerially for qualifying splits 	<ul style="list-style-type: none"> • Do not apply tentative map/hearing requirements to qualifying splits • Avoid subjective “character” findings
SB 35 / SB 423 Eligible Multifamily	Ministerial (Streamlined)	<ul style="list-style-type: none"> • Make early eligibility determination • Limit review to objective standards • Follow statutory timelines • Avoid discretionary design review 	<ul style="list-style-type: none"> • Do not require CUPs, rezones, overlays, or hearings • Do not apply subjective design language
Standard Multifamily (Not State-Streamlined)	Local Process (As Allowed)	<ul style="list-style-type: none"> • Use objective standards where possible • Minimize hearings • Consolidate review steps • Provide clear submittal guidance 	<ul style="list-style-type: none"> • Avoid redundant review cycles driven by unclear checklists and fragmented comments.



3. Recommendations for Updating City Policy Documents: 1992 General Plan, 2021-2029 Housing Element, and Downtown Imperial Redevelopment Master Plan & Design Guidelines

Local policy documents must reinforce, rather than undermine, the City’s zoning and permitting framework. It is our professional opinion that the 1992 General Plan, the 2021-2029 Housing Element, and Downtown Imperial Redevelopment Master Plan & Design Guidelines should be updated to remove subjective policies that conflict with State housing law and to clearly support ministerial approval pathways, especially for infill and affordable residential development, where required.

3.1 General Plan (Land Use and Housing Elements)

Current Condition: The City of Imperial’s General Plan includes policies such as *“Preserve community character through design review”* and *“Promote neighborhood compatibility for new housing developments.”* While these policies aim to maintain local standards, they can introduce subjective criteria that may conflict with State requirements for ministerial approval and streamlining of residential development applications. For example, the Land Use Element requires new multifamily projects to *“blend with existing architectural styles,”* which is interpreted and determined via a discretionary review.

What State Law Requires / Allows: State law, specifically Government Code §§ 65583, 65583.2, 65589.5, and 65913.4, require that housing projects qualifying for streamlining (such as under Senate Bill SB 35 and SB 423) must be reviewed ministerially, using only objective standards. Subjective policies or discretionary findings, like those in Imperial’s General Plan related to compatibility or architectural blending, cannot be applied to qualifying projects. Statutory preemption further requires that local plans defer to State housing law where conflicts arise (CA Gov. Code § 65589.5, subd. (j)).

What to Change: To streamline permitting and further compliance with State law, it is recommended that the City revise General Plan policies as follows:

- **Amend** the policy *“Preserve community character through design review”* to specify that, for qualifying housing projects under SB 35 and SB 423, approval shall be ministerial (Gov. Code § 65913.4) and not subject to discretionary findings.
- **Clarify** that policies such as *“Promote neighborhood compatibility”* and *“Blend with existing architectural styles”* do not apply to streamlining-eligible housing approvals, consistent with the requirements of Gov. Code §§ 65583 and 65589.5.
- **Add** explicit language acknowledging preemption by State housing law where General Plan policies conflict with statutory requirements for streamlining (Gov. Code § 65589.5, subd. (j)).

How to Implement:

- **Prepare** targeted amendments to the General Plan’s Land Use and Housing Elements, updating language in sections such as *“Housing Goals and Policies”* and *“Neighborhood Design Standards”*



to ensure consistency with State law (Gov. Code §§ 65583 and 65913.4) and concurrent zoning code updates.

- **Include** annotations in the General Plan indicating which policies (e.g., “design review”) apply only to discretionary projects, not to projects streamlined under SB 35, SB 423, or similar statutes.
- **Provide** staff guidance by linking updated General Plan policies to specific permitting pathways, with clear examples, such as “ministerial review for SB 35-eligible multifamily” versus “discretionary review for custom single-family homes,” and reference corresponding government codes and streamlining bills.

3.2 2021-2029 Housing Element

Current Condition: The City’s adopted 2021-2029 Housing Element Update identifies housing needs, site inventory capacity, and implementation programs; however, it does not always clearly connect these commitments to day-to-day permitting and plan review practices. As a result, assumed development capacity may be constrained by discretionary processes or subjective interpretation.

What State Law Requires/Allows: Housing Elements must be internally consistent with zoning and permitting practices and rely on realistic, achievable development capacity. Jurisdictions must remove governmental constraints to housing production and implement Housing Element programs in practice. Failure to do so may jeopardize eligibility for streamlining laws such as SB 35 and SB 423 (Gov. Code §§ 65583, 65583.2, 65589.5, 65913.4).

What to Change:

- **Update** Housing Element implementation programs (including but not limited to Program 7: Zoning Ordinance) to explicitly commit the City of Imperial to ministerial review for qualifying housing projects, reliance on objective standards, and early eligibility determinations as required by SB 35, SB 423, and Gov. Code § 65913.4.
- **Clarify** that zoning and permitting practices will not impose discretionary barriers inconsistent with Housing Element assumptions, ensuring compliance with Gov. Code §§ 65583, 65589.5.
- **Align** Housing Element policies with CEQA exemptions and ministerial approvals available under State law, referencing AB 1515 and Gov. Code § 65589.5.
- **Add** explicit language acknowledging state preemption where General Plan policies conflict with statutory requirements for streamlining and housing production (Gov. Code § 65589.5, subd. (j)).

How to Implement:

- **Revise** Housing Element program language to reference specific implementing ordinances and administrative procedures, such as adopting a checklist for SB 35/SB 423 eligibility (Gov. Code § 65913.4).
- **Cross-reference** Housing Element sites with applicable ministerial approval pathways, ensuring that projects meeting objective standards are not subject to discretionary review (Gov. Code §§ 65583, 65589.5).

- **Track and report** implementation outcomes through annual Housing Element progress reporting, as required by Gov. Code § 65400.
- **Provide** staff guidance linking updated Housing Element policies to specific permitting pathways, with clear examples such as "ministerial review for SB 35-eligible multifamily" versus "discretionary review for custom single-family homes," and reference corresponding government codes and streamlining bills.

3.3 Downtown Imperial Redevelopment Master Plan & Design Guidelines

Current Condition: The Downtown Imperial Redevelopment Master Plan & Design Guidelines emphasizes placemaking, design quality, and character-based goals. Many policies rely on qualitative guidance or discretionary review, which may conflict with State housing streamlining requirements when applied to residential or mixed-use housing projects.

DOWNTOWN IMPERIAL REDEVELOPMENT MASTER PLAN



- ▣ Boxy and monotonous facades that lack human scale dimensions and have large expanses of flat wall planes should be avoided. Veneer materials should turn corners and avoid exposed edges.
- ▣ To provide visual interest and avoid an identical appearance, garage doors should incorporate architectural detailing, such as patterned garage doors or painted trim.
- ▣ In order to "scale down" facades that face incompatible uses, it may be desirable to set back portions of the upper floors of new multi-family buildings.



What State Law Requires / Allows: For housing projects subject to State streamlining statutes, cities must apply only objective standards and may not impose discretionary design review or additional approvals. Downtown revitalization policies must be administered consistently with the Housing Accountability Act and applicable streamlining laws (Gov. Code §§ 65589.5, 65913.4, 65852.21; SB 35; SB 423; AB 1515).

SAMPLE OBJECTIVE STANDARD: *For new multi-family buildings that directly face an incompatible use(s), an upper story setback (or stepback) of 5 feet from side above first floor shall be maintained.*





What to Change (Streamlining Recommendations): To align the Downtown Imperial Redevelopment Master Plan & Design Guidelines with State law and streamline housing approvals, the following specific recommendations are proposed:

- **Convert** all qualitative or discretionary design policies in the Downtown Imperial Redevelopment Master Plan & Design Guidelines into clear, measurable, and objective development standards for **multifamily residential** and **residential mixed-use** projects. This ensures compliance with SB 35, SB 423, and Gov. Code §§ 65589.5, 65913.4, which require objective standards for ministerial review.
- **Clarify** that discretionary design review, special overlays, or master plan approvals do not apply to ministerial housing projects that qualify for streamlining under SB 35, SB 423, or Gov. Code § 65913.4.
- **Reference** relevant Public Resources Code (PRC) sections regarding CEQA exemptions for qualifying infill and affordable housing projects, such as PRC § 21080(b)(1) and PRC § 21099(d), to facilitate streamlined environmental review where applicable.

How to Implement:

- **Update** the Downtown Imperial Redevelopment Master Plan & Design Guidelines concurrently with zoning code and design standards amendments to ensure all standards for housing are objective and consistent with State streamlining statutes (SB 35, SB 423, Gov. Code §§ 65589.5, 65913.4, 65852.21).
- **Create** an "Objective Downtown Standards Appendix" that can be applied at permit intake for qualifying housing projects, laying out all measurable criteria required by State law.
- **Train** staff to distinguish between discretionary design guidance (not applicable to streamlined housing) and objective standards (which must be used for qualifying projects) and provide permitting checklists referencing SB 35/SB 423 eligibility and applicable Government and Public Resources Code sections.
- **Regularly (annual) review and update** the Downtown Imperial Redevelopment Master Plan & Design Guidelines to maintain consistency with any future changes to State streamlining laws or relevant Assembly and Senate bills.

4. Detailed Zoning and Regulatory Recommendations

4.1 Residential Development Standards

Current Condition: Base zoning regulations can prevent affordable and mixed-income residential projects from achieving feasible unit counts, even when incentives such as density bonuses are achievable.

A. General Requirements

The following requirements are minimums unless otherwise stated.

	RR	RL	R-1	RC	RA
1. Density-maximum units per net acre.	0.5-1.0	2.0	6.0	12-20*	20-30*
2. Net lot area (In sq. ft.)	1 acre	20,000	6,000	7,500	7,500
3. a. Lot width (in feet)	110	100	65	150 int. 70 corner	150 int. 165 corner
b. Cul-de-sac or odd shaped lot width (in feet)	30	30	30	-----	-----
c. Flag lots	20	20	20	-----	-----
4. Lot Depth (in feet)	150	150	100	100 int. 150 corner	165 int. 135 corner
5. Front yard setback	40	30	20	20	20
6. Side yard setback – each side (in feet)	20	15	5	15	10
7. Side yard setback – street side (in feet)	20	15	10	20	20
8. Rear yard setback (in feet)	50	40	10	20	10
9. Lot coverage, maximum	35%	35%	50%	50%	60%
10. Building and structure height (In feet)	35 feet or 2 stories, whichever is less				

* In the RC and RA zones, approval of projects at the maximum density shall only be given on the basis that the project exceeds the standards of the zone and the General Plan. Any density beyond the minimum permitted beyond the zone will require Planning Commission and City Council approval.

What State Law / Policy Intent Requires: California housing law requires that local zoning standards, including density and height limits, not preclude development capacity assumed in the adopted Housing Element. Jurisdictions may not apply standards that reduce density, height, or unit yield for qualifying



housing projects in a manner that conflicts with Housing Element assumptions or State streamlining laws (Gov. Code §§ 65583.2, 65589.5, 65915).

What to Change (Ordinance Updates):

- **Increase** base density ranges in multifamily zones to better align with Housing Element capacity assumptions. Consider increasing maximum densities to approximately 35 units per acre in the RC zone and 55 units per acre in the RA zone, as current setback, parking, and height standards routinely reduce achievable densities below those assumed in the 2021–2029 Housing Element. Additionally, Section 24.03.120 of the Imperial Zoning Code requires discretionary approval for densities above the minimum, a provision that is inconsistent with State law when applied to qualifying affordable housing projects and should be modified or eliminated.
- **Allow** additional height where projects include deed-restricted affordable units and/or qualify for density bonus concessions. The current 2-story or 35-foot maximum building height limit forces projects to spread horizontally, which may conflict with setbacks and on-site infrastructure requirements. Allowing modest additional height (e.g., up to 3-stories in the RA zone, similar to the Worthington Square Apartments and Imperial Senior Village Apartments) enables vertical stacking of units on already serviced sites, increasing yield without expanding building footprint or requiring zoning incentives.
- **Convert** minimum setbacks for multifamily residential and residential mixed-use projects to maximums. Consider establishing a maximum interior side yard setback of 5 feet and a maximum rear yard setback of 10 feet, while allowing zero lot-line setbacks for qualifying multifamily residential and residential mixed-use buildings. Shifting to maximum setbacks increases buildable area and improves site layout efficiency while maintaining objective, clear, and predictable development standards.

How to Implement (Administrative Steps):

- **Train** staff on applying objective standards consistently and documenting compliance in staff notes.
- **Consider** creating a one-page “Density/Height Quick Reference” for staff and applicants describing base allowances and when bonus/height increases apply.

4.2 Remove Conditional Use Permit (CUP) Requirements for Housing Where State Law Requires Ministerial Approval

Current Condition: Housing types that are otherwise consistent with residential zoning may still be routed into discretionary approvals (e.g., CUPs or similar entitlements), which may create delays and legal risks when state law requires ministerial processing.

What State Law Requires: State law prohibits cities from requiring discretionary entitlements, including conditional use permits or similar approvals, for housing developments such as Group Residential Living homes and Supportive or Transitional housing, that may qualify for ministerial processing under State



statutes. Such projects must be approved based solely on compliance with objective standards (Gov. Code §§ 65589.5, 65913.4, 65852.21).

What to Change (Ordinance Updates):

- **Revise** zoning use tables so multifamily, supportive housing (AB 2162), and other qualifying residential uses are “Permitted by Right” in applicable zones, in compliance with State law.
- **Delete or limit** subjective CUP findings that rely on “*compatibility*,” “*harmony*,” or “*neighborhood character*” for housing projects.
- **Add** a clear rule: “Housing projects that comply with applicable objective standards shall be approved.”

How to Implement (Administrative Steps):

- **Create** a staff-facing “Ministerial vs. Discretionary” decision tree that identifies when CUPs are prohibited.
- **Update** application intake forms and checklists so applicants are routed correctly on Day one.
- **Bundle** interdepartmental comments.



4.3 Adopt a Fully Compliant Accessory Dwelling Unit (ADU)/Junior Accessory Dwelling Unit (JADU) Ordinance and Eliminate Discretionary ADU Approvals

Current Condition: ADUs (or Second Single Family Dwelling with a Kitchen, as currently identified in Section 24.03.110 of the Imperial Zoning Code) are regulated under outdated classifications that require discretionary permits, impose owner-occupancy, or set size limits that are not compliance with State law. These provisions create confusion and may suppress ADU production.

24.03.110 PERMITTED AND CONDITIONAL USES: R ZONES

The following uses shall be permitted uses where the symbol "P" appears and shall be permitted uses subject to a Conditional Use Permit where the symbol "C" appears in the column beneath each zone designation; the symbol "X" indicates prohibition:

A. Residential Uses	RR	RL	R-1	RC	RA
1. Single Family Dwellings	P	P	P	P	P
2. Duplex (2 separate family dwellings)	X	X	X	P	P
			(Ord. 736, 2/07)		
3. Guest dwellings or accessory living quarters with no kitchen.	P	P	P	P	P
4. Second single family dwelling with kitchen on the same lot as an existing single family dwelling (See Section 24.03.130 A3)	C	C	C	C	C
5. Mobilehomes on individual lots, and permanent foundations which are certified under the National Mobilehome Const. and Safety Standards Act of 1974 and which are constructed after Oct. 1976.	P	P	P	X	X
6. Group residential, including but not limited to boarding or rooming homes, dormitories, retirement homes.	X	X	X	C	C
7. Multiple dwellings					
a. Rental	X	X	X	P	P
b. Condo Conversions	X	X	X	C	X



What State Law Requires: ADUs and JADUs must be approved ministerially, without discretionary review or hearings, and local regulations must meet or exceed State-mandated minimum allowances for unit size, setbacks, parking, and owner-occupancy restrictions (Gov. Code §§ 65852.2, 65852.22). Additionally, cities must develop a program for the preapproval of ADU plans, pursuant to Gov. Code § 65852.27.

What to Change (Ordinance Updates):

- **Repeal** outdated “Second Single Family Dwelling with a Kitchen” provisions and adopt a standalone ADU/JADU section aligned with state requirements.
- **Allow** ADU/JADU development by-right in all residential zones and in other zones where residential uses are allowed.
- **Remove** owner-occupancy requirements and discretionary permit triggers.
- **Align** ADU size and parking standards with State minimums and exemptions; codify the statutory review timeframe.

How to Implement (Administrative Steps):

- **Publish** an ADU/JADU submittal checklist with minimum plan requirements (site plan, setbacks, utility connections, and objective design standards).
- **Create** pre-approved plan templates or example site plan sheets for homeowners to reduce incomplete submittals, pursuant to State law (Gov. Code § 65852.27).
- **Consider** establishing an expedited review process, including issuance of one consolidated comment letter per review, for ADU/JADU construction documents.

4.4 Establish a Ministerial SB 9 (Duplex/Urban Lot Split) Process That Avoids Subdivision Hearings

Current Condition: Local subdivision procedures described in Chapter 20-Subdivision of the Imperial City Code may still rely on tentative maps, discretionary findings, and public hearings. For Senate Bill SB 9-eligible projects, these discretionary steps cannot be applied.

What State Law Requires: SB 9 requires ministerial approval of qualifying duplex developments and urban lot splits. Cities may apply only objective zoning and design standards and may not require discretionary subdivision maps, findings, or public hearings for qualifying projects, pursuant to State law (Gov. Code § 65852.21).

What to Change (Ordinance Updates):

- **Add** an SB 9 subsection to Chapter 20-Subdivision of the Imperial City Code specifying ministerial processing for qualifying lot splits.
- **Remove or bypass** discretionary map findings and public hearing requirements for SB 9 lot splits.
- **Adopt** objective SB 9 design standards (e.g., setbacks, height, lot coverage) that can be checked ministerially.



How to Implement (Administrative Steps):

- **Create** an SB 9 eligibility checklist for intake (objective items only).
- **Develop** a standard conditions template for SB 9 approvals to ensure consistency.
- **Coordinate** City engineering review early to confirm infrastructure and utility connections without creating new discretionary triggers.

4.5 Align Parking Standards with State Streamlining Requirements

Current Condition: Parking requirements can materially reduce feasible unit yield and increase construction cost. Where State law caps or reduces parking, local standards should not be applied in a way that conflicts with State limits.

What State Law Requires: State law limits local parking requirements for certain housing developments, including affordable housing, ADUs, and projects located near transit. Cities may not impose parking standards that exceed State limits for qualifying projects (Gov. Code §§ 65915, 65852.2; 65913.4).

What to Change (Ordinance Updates):

- **Establish** parking maximums in the RC and RA zones to better support residential and affordable housing development. Consider capping parking at 1 space/unit, allowing 0.5 space/unit for affordable or studio units, and permitting tandem parking configurations where appropriate. Parking maximums help reduce development costs, improve site efficiency, and better align parking supply with actual residential demand while maintaining clear, objective standards.
- **Add** a clear “State parking limits apply” provision for ministerial projects where applicable.
- **Create** objective, location-based parking reductions (e.g., near transit or in infill contexts) consistent with State law direction.

How to Implement (Administrative Steps):

- **Consider** adding a parking-limits screening step to the intake checklist for ADUs, SB 9, and SB 35 pathways.
- **Consider** providing City staff with a standard memo template documenting which parking rule set applies and why.



4.6 Remove Local “Conflict” and “Ambiguity” Provisions That Create Discretionary Chokepoints

Current Condition: Local code provisions under Section 24.01-General Provision of the Imperial Zoning Code addressing conflicts among ordinances or ambiguity resolution may be applied in a way that routes housing projects into discretionary decision-making.

24.01.150 CLARIFICATION OF AMBIGUITY

If ambiguity arises concerning the appropriate zone or classification of a particular use within the meaning and intent of this Title, or if ambiguity exists with respect to matters of height, yard requirements, area requirements or zone boundaries as set forth herein, it shall be the duty of the Planning Director to ascertain all pertinent facts and forward said findings and interpretations, to the Planning Commission for a recommendation and then transmit said recommendation to the Council. If said recommendation is approved by the Council, thereafter such interpretation shall govern.

What State Law Requires: Where local ordinances conflict with State housing law, State law preempts the local provision. Jurisdictions may not use ambiguity or conflict-resolution provisions to impose discretionary review or delay ministerial housing approvals (Gov. Code §§ 65589.5, 65913.4).

What to Change (Ordinance Updates):

- **Amend** conflict/ambiguity clauses under Section 24.01-General Provision of the Imperial Zoning Code to explicitly state that State housing law controls where applicable.
- **Prohibit** the use of ambiguity resolution to require Planning Commission/City Council action for ministerial housing pathways.
- **Require** staff to interpret unclear standards in a manner consistent with state streamlining requirements and objective review.

How to Implement (Administrative Steps):

- **Escalate** true/verifiable conflicts to the City Attorney for rapid interpretation without stopping statutory timelines.
- **Document** interpretations in a consistent written format to support predictability and defensibility.
- **Consider** creating an internal “Housing Law Preemption” reference sheet for planners and plan check staff.

4.7 Operationalize CEQA Streamlining and Exemptions for Housing

Current Condition: Housing projects may be processed through CEQA pathways even when exemptions or streamlining provisions could apply, increasing time and uncertainty.

What State Law Requires / Allows: Ministerial housing approvals are not subject to CEQA. In addition, qualifying infill housing developments may be eligible for statutory or categorical exemptions or



streamlined environmental review, and cities may not require environmental analysis where CEQA does not apply (Public Resources Code §§ 21080, 21159.21).

What to Change (Procedures and Guidance):

- **Create** a CEQA housing screening checklist to identify when CEQA does not apply (ministerial) versus when exemptions/streamlining may apply.
- **Consider** standardizing documentation for commonly used exemptions (e.g., infill categorical exemption) when applicable.
- **Ensure** City staff do not require CEQA documentation for pathways that are ministerial by statute.

How to Implement (Administrative Steps):

- **Coordinate** early with City Engineering/Public Works to identify and mitigate common “significant impact” triggers that could jeopardize exemption use.
- **Consider** creating standard templates for exemption findings and supporting documentation checklists.

4.8 **Create an Affordable Housing Review Track (Plan Check, Fees, and Predictable Timelines)**

Current Condition: Affordable housing projects can experience extended plan-check cycles, multiple correction rounds, and carrying costs. Fee deferrals may be available but are applied inconsistently.

What State Law Requires/Allows: California law requires jurisdictions to remove governmental constraints to affordable housing development and implement programs identified in the Housing Element. Delays or inconsistent application of review procedures may constitute a governmental constraint (Gov. Code §§ 65583(c), 65589.5).

What to Change (Program and Procedure Updates):

- **Establish** a defined affordable housing intake and review track with predictable review timelines and a single point of contact.
- **Codify** objective eligibility for fee deferrals/reductions where feasible (or adopt an administrative policy that standardizes decisions).

How to Implement (Administrative Steps):

- **Adopt** an ‘Affordable Housing Intake Form’ identifying funding type, affordability levels, and applicable streamlining pathway.
- **Consider** tracking affordable housing review performance (days to completeness, days per review cycle) to identify bottlenecks



5. Detailed Permitting and Process Recommendations

5.1 Publish Standardized Checklists and Minimum Submittal Standards

Current Condition: Per feedback from frontline City staffers and plan reviewers, applicants frequently submit incomplete plans for ADUs, small multifamily projects, and room additions. The City does not currently provide standardized, public-facing checklists that clearly define required permits, minimum plan contents, or when engineering or fire review is triggered. As a result, City staff spends significant time on coaching and re-reviews.

What State Law Requires/Allows: The Permit Streamlining Act requires jurisdictions to clearly identify required application materials and determine project completeness within statutory timeframes. Incomplete or unclear requirements may not be used to delay housing approvals (Gov. Code §§ 65920–65964.5).

What to Change: Publish public-facing checklists for common project types (ADUs, room additions, multifamily, grading, encroachment, fire).

- **Define** minimum site plan requirements (dimensions, scale, setbacks, utilities, drainage features) and provide examples.
- **Create** easy-to-use visually attractive guides that explain which permits are needed and what triggers engineering/fire review.

How to Implement:

- **Develop** checklists as fillable PDFs and mirror them online and at the permit counter.
- **Require** City staff to review checklists with applicants at submittal to reduce back-and-forth.
- **Establish** a minimum acceptable standard and a simple template sheet for hand-drawn plans.

5.2 Integrate County Fire Review Into the City’s Workflow

Current Condition: According to representatives from the Imperial County Fire Department, fire site plan review is conducted largely outside the City’s main workflow and is often coordinated via email or transmitted via flash drives. Fire Department comments are not consistently bundled with City comments, making fire review the longest and least predictable phase of permitting.



What State Law Requires/Allows: Cities must process housing permits within statutory timelines and may not delay approvals through fragmented or sequential departmental review processes. Required conditions must be imposed objectively and within mandated review periods (Gov. Code §§ 65950–65957, 65589.5).



What to Change:

- **Adopt** a fire site plan review submittal checklist and require it at intake for projects that trigger fire review.
- **Create** a single City tracking method for fire comments and conditions to avoid email-only workflows and version confusion.
- **Establish** expected turnaround targets and communicate them to applicants.

How to Implement:

- **Bundle** Fire Department comments with City comments into one consolidated correction letter per cycle.
- **Consider** assigning a dedicated staff coordinator responsible for transmitting complete packages and receiving consolidated fire comments.
- **Consider** using a standard naming convention for plan sets (date/version) to reduce resubmittal confusion.

5.3 Bundle Department Comments and Reduce Redundant Handoffs

Current Condition: Departments often issue comments independently and at different times. Applicants may receive multiple correction letters per cycle, and conditions of approval are not always carried forward consistently, increasing review cycles and staff workload.

What State Law Requires/Allows: State law requires jurisdictions to act on housing applications within specified timeframes and limits the ability to extend review through multiple, uncoordinated comment cycles. Failure to meet deadlines may result in approval by operation of law (Gov. Code §§ 65950–65957).

What to Change:

- **Remove** redundant internal notifications and ensure conditions carry forward consistently.

How to Implement:

- **Consider** adopting a shared tracking sheet for review status, outstanding items, and dates of resubmittals.
- **Consider** holding a weekly internal “permit huddle” focused on affordable housing and other time-sensitive applications.

5.4 Formalize Ministerial Eligibility Determinations (SB 35/SB 423, SB 9, ADUs)

Current Condition: Eligibility determinations for ministerial pathways are sometimes made late or informally. Some qualifying projects are incorrectly routed into discretionary review due to lack of written eligibility procedures.

What State Law Requires/Allows: Jurisdictions must make early, written determinations regarding eligibility for ministerial housing pathways, including SB 35, SB 9, and ADU approvals. Denials or reductions must be supported by substantial evidence based on objective standards (Gov. Code §§ 65589.5, 65913.4, 65852.21).

What to Change:

- **Create** written eligibility checklists and determination templates for each ministerial pathway.
- **Clearly** identify which objective standards apply at the time of application submittal
- **Require** City staff to make the determination early and document it in writing.

How to Implement:

- **Consider** developing and issuing an “Eligibility Determination Letter” template for SB 35/SB 423 projects (eligible/ineligible with objective reasons).

Table 5-1. Ordinance/Procedure Update Matrix

Topic	Current Issue	Change To	Implementation Deliverable
ADUs	Outdated classification; discretionary approvals; owner-occupancy; sub-state size limits	Standalone ADU/JADU chapter; administrative approval; objective standards; statutory timeline	ADU ordinance + ADU checklist + homeowner site plan template
SB 9	Subdivision hearings/finding-based processing	Ministerial SB 9 pathway with objective standards and checklist	SB 9 checklist + standard conditions template
CUPs for Housing	Housing routed into discretionary CUPs with subjective findings	Permitted-by-right housing where required; remove subjective findings for qualifying projects	Use table updates + ministerial decision tree
Overlays/Design Review	Subjective overlay/design findings applied to housing	Overlays optional; objective standards only; no discretionary design review for ministerial projects	Overlay chapter amendments + objective design standards summary
Fire Review Workflow	External email-based review and tracking	Integrated checklist + consolidated comments + clear tracking	Fire checklist + comment bundling protocol
CEQA Screening	CEQA work required when ministerial or exemptions apply	Standardized CEQA screening and exemption documentation	CEQA housing screening form + exemption templates

6. City of Imperial Community Development Website Recommendations

6.1 Community Development Department Webpage – Applications and Visual Guides

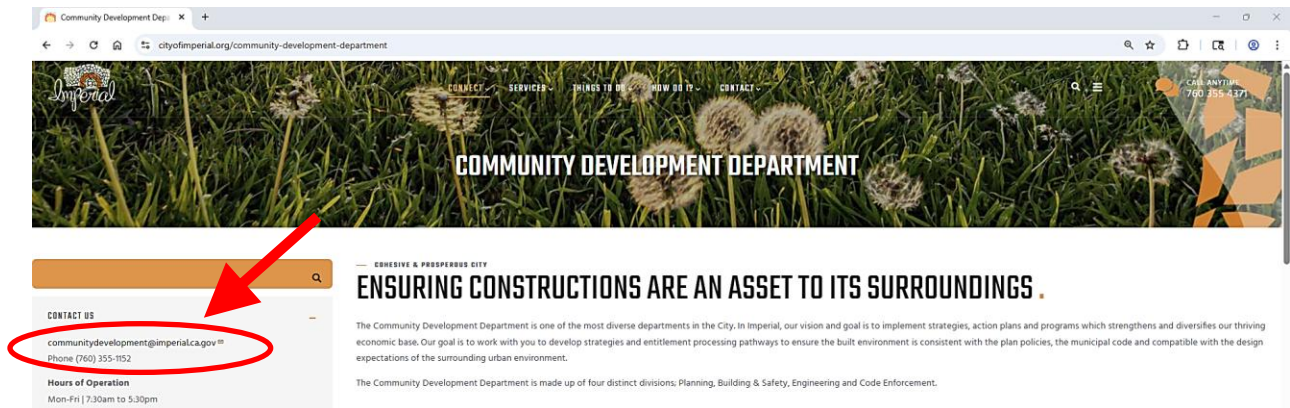
Current Condition: The applications provided on the Community Development Department's home page are currently not fillable online, and there are no visual workflow guides or application submission checklists available for public use.

What to Change:

- **Ensure** that all Planning, Building, Engineering Division applications for submittal are form fillable to increase readability and reduce review time by City Staff. Visual workflow guides prepared by GHD should be included on the main Community Development Department page as well as on each division's individual page. County Fire Department visual guides should also be posted on the main Community Development Department page and the respective pages for each division, including the Fire webpage.

6.2 Community Development Department Webpage - Staff Contacts

Current Condition: The Community Development Department home page includes a brief biography of the Community Development Director, as well as a general email address (communitydevelopment@imperial.ca.gov) provided for the entire department. However, the website does not list the names, titles, or direct contact information for other Community Development Department staff. Moreover, Feedback from stakeholder interviews indicates that the lack of direct staff contact information is perceived by members of the development community as a barrier to efficient communication and coordination with City personnel.



What to Change:

- **Add** department staff by division and provide direct contact information (e.g., phone number and email) to streamline public inquiries, ensure requests are routed to the appropriate division and staff member, and verify that all contact details are current and accurate for each listed staff member. In addition, consider creating generic email addresses for each division that includes all staff assigned to that division as well as the community development director. This approach



ensures that inquiries are distributed to all relevant personnel, reducing the risk of missed communication if a single staff member is unavailable or overlooks a message. Utilizing division-level emails will help guarantee prompt responses and maintain continuity in handling public requests.

6.3 Community Development Department Webpage – Environmental Justice Element

Current Condition: Within the side navigation menu of the Community Development home page, the "Related Pages" section includes a link to the Environmental Justice Element, which is presently under development.

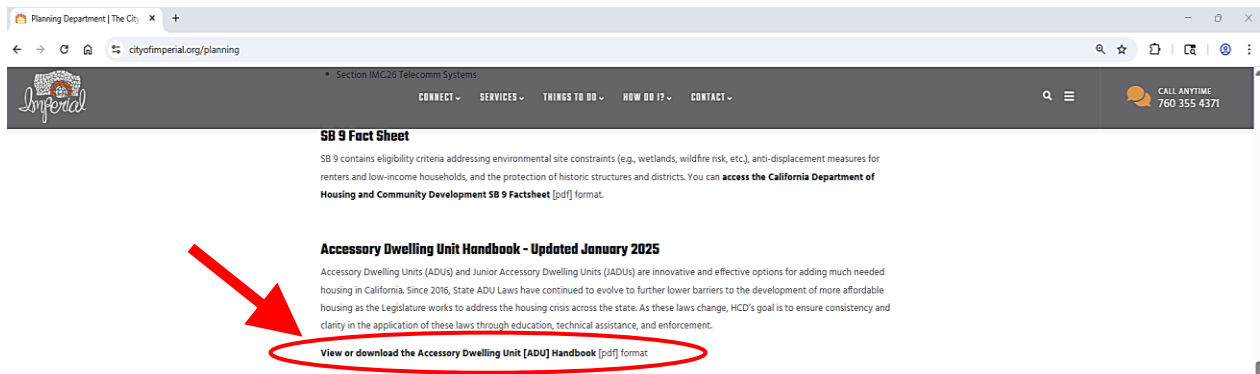
What to Change:

- **Incorporate** the final Environmental Justice Element into both the dedicated General Plan and the Planning Division webpages, when adopted.

6.4 Community Development Department Webpage – Accessory Dwelling Unit Handbook

Current Condition: The Planning Division webpage contains text and a PDF link to the 2025 ADU Handbook, which indicates it was updated in January 2025. This is used in lieu of the City having a codified, State law compliant ADU ordinance.

Although the State’s ADU handbook was last updated in January 2025, an addendum was issued in December 2025 that became effective on January 1, 2026. The addendum summarized recent modifications to State ADU law. Therefore, the City’s posted materials should reflect these updates: “California Department of Housing and Community Development (HCD) Accessory Dwelling Unit (ADU) Handbook (January 2025), as supplemented by HCD’s January 2026 Addendum summarizing changes to State ADU Law effective January 1, 2026.”



What to Change:

- **Include** a link to the HCD website to ensure timely access to live updates or future addendums, thereby enhancing the accuracy and reliability of information.

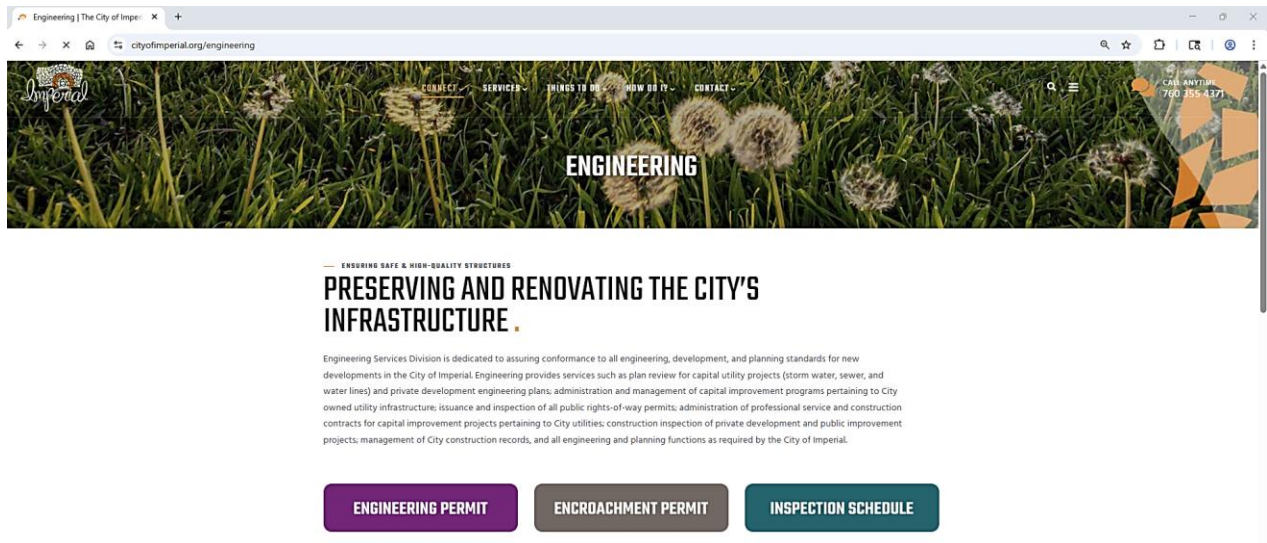


6.5 Community Development Department Webpage – CitizenServe

Current Condition: CitizenServe currently supports only a limited selection of Planning application types. Additionally, there is no CitizenServe access button available on the individual Planning, Code Enforcement, or Engineering webpages. However, it is understood that City is preparing to discontinue the use of CitizenServe and transition to a different application processing platform, tentatively by the end of 2026.

What to Change:

- (In the interim) **Include** additional planning application types to CitizenServe to facilitate more efficient application processing.
- (In the interim) **Add** CitizenServe buttons, similar to those on the Building & Safety page, on the Planning, Code Enforcement, and Engineering webpages for enhanced accessibility.



6.6 Community Development Department Webpage – Engineering Division Webpage

Current Condition: The Engineering Division webpage features an access button for the 2019 inspection schedule. Additionally, the page may contain plans that are no longer current.

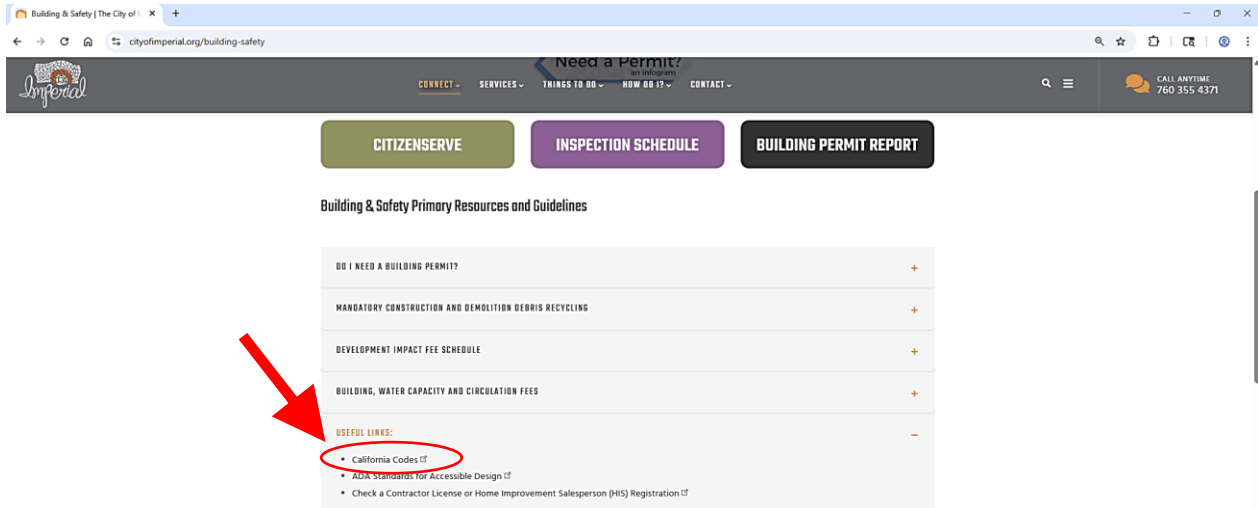
What to Change:

- **Update** the inspection schedule as appropriate or remove it from the page if it is no longer in use by the city. Review all plans, including but not limited to Urban Water Management Plans, and consider archiving outdated materials to ensure the public is not confused about which plan is current.

6.7 Community Development Department Webpage – Building & Safety Division Webpage

Current Condition: The Building & Safety Division webpage provides access buttons for the 2023 inspection schedule and building permit reports, with the most recent reports dating back to 2022. The Development Impact Fee Schedule indicates that the latest available version is from 2019, which is

identified as a draft rather than a final document. Additionally, the Building, Water Capacity, and Circulation Fees lack information regarding their last modification dates, raising questions about their current validity and accuracy. In the useful links section, the link to the California Building Code is labeled as "California Codes."



What to Change:

- **Revise and update** Inspection schedule to align with the current year.
- **Update** Building Permit Reports to cover the period from 2023 through 2026.
- **Update** Development Impact Fees to reflect the most accurate amounts available and present the finalized version, rather than the draft. All fees listed on the Building & Safety page, including Building, Water Capacity, and Circulation Fees, should undergo a thorough review for accuracy.
- **Consider** renaming the link titled “California Codes” to “California Building Code Title 24” to enhance visibility and accessibility for the public and eliminate potential confusion.

6.8 Community Development Department Webpage – Planning Division Webpage

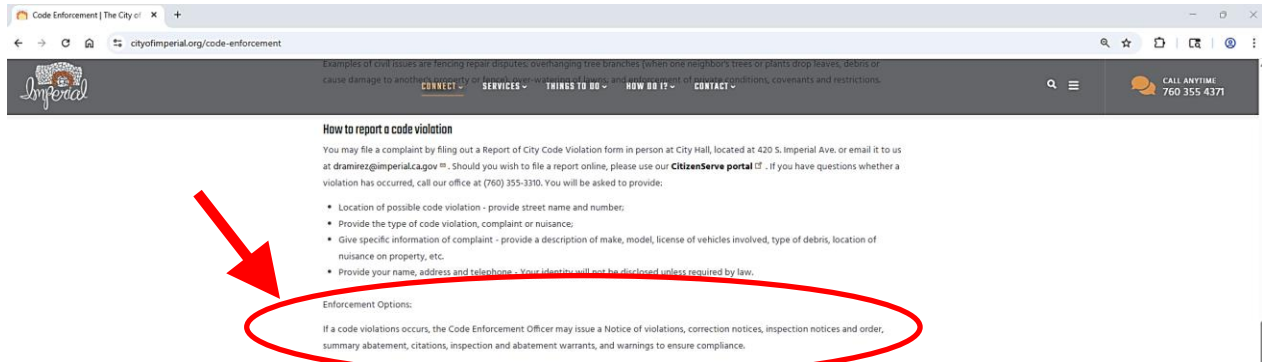
Current Condition: At present, the Planning Division webpage does not provide a link to the current Zoning Map, the 1992 General Plan, or the 2021-2020 Housing Element Update.

What to Change:

- **Provide** links to the Zoning Map, the 1992 General Plan, or the 2021-2020 Housing Element Update.
- **Consider** developing interactive ArcGIS maps for zoning and land use.

6.9 Community Development Department Webpage – Code Enforcement Division Webpage

Current Condition: The Code Enforcement Division webpage offers a concise overview of available enforcement options; however, it does not outline the specific sequential steps or procedures necessary for achieving compliance.

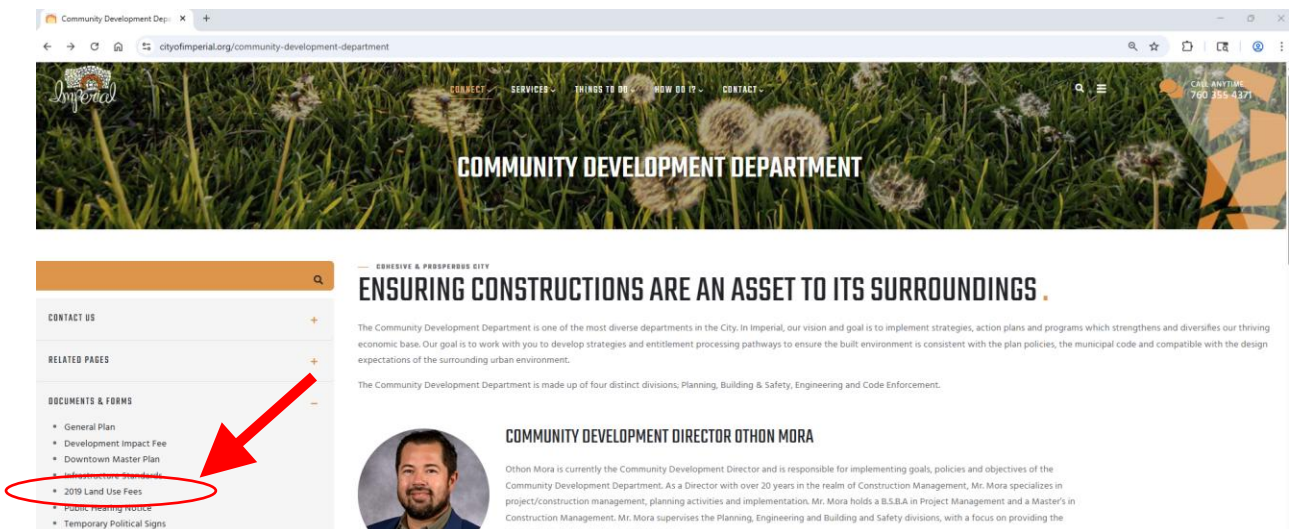


What to Change:

- **Update** to provide enforcement procedures in a clear, step-by-step format. This approach will help residents and property owners understand their available options and the sequence of actions that follow if compliance is not achieved.
- **Provide** step-by-step Code Enforcement procedures that clearly describe the actions taken after an individual receives a warning or notice of violation. Specify whether a notice results in an immediate citation, further warning, or the scheduling of inspections.

6.10 Community Development Department Webpage – Land Use Fees

Current Condition: The Community Development Department homepage, under the Documents & Forms section, includes a link to the 2019 Land Use Fees. Within this schedule, there is a listed fee for “Pre-Application Meetings.” However, the city does not currently charge a fee for these meetings.



What to Change:



- **Regularly** review and update the Land Use Fees published on the Community Development Department homepage ensure their accuracy and appropriateness. It is possible that the 2019 fees no longer reflect the City's present costs, including staff time and materials.
- **Evaluate** the collection of payment for pre-application meetings. These meetings necessitate dedicated time from multiple department representatives and divert resources from other responsibilities. Consistently collecting the pre-application meeting fee, already adopted by the City Council, would help offset the associated staff time. To reduce the financial burden on applicants and affirmatively incentivize early engagement, the pre-application fee may be credited toward a subsequently submitted entitlement application at the time of intake.
- **Consider** establishing mandatory pre-application meetings for potential projects that involve multiple entitlements, require discretionary review by City Council, or have the potential to affect City policy or land use. Such applications may include, but are not limited to Annexations, Specific Plans, General Plan Amendments, Zone Changes, Text Amendments, and parcel maps for non-SB 9 eligible lot splits.

7. Implementation Priorities and Workplan

California law requires jurisdictions to remove governmental constraints to housing production, affirmatively further fair housing, and implement Housing Element programs in practice. Cities must monitor regulatory effectiveness and update policies, ordinances, and procedures as needed to maintain ongoing compliance (Gov. Code §§ 65583(c), 65584.04; 42 U.S.C. § 3608(e)). The following table provides a recommended sequence actions to achieve early compliance and process clarity first, followed by zoning capacity updates and longer-term cost/infrastructure strategies.

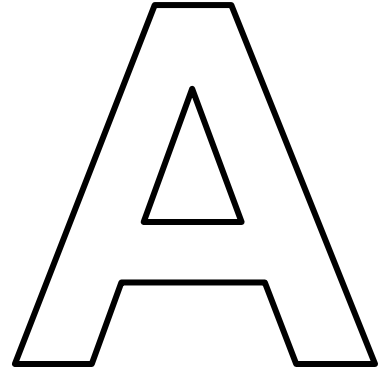
Table 7.1 Recommended Implementation Sequence

Timeframe	Section/Topic	Primary Objective	Actions	Deliverables
Near-Term 0–12 months	Code Enforcement Process	Increase transparency and guidance for addressing violations	<ul style="list-style-type: none"> • Outline enforcement steps • Specify notice outcomes • Publish public guidance materials 	<ul style="list-style-type: none"> • Updated enforcement protocols • Public-facing guidance documents
	Community Development Dept. – Land Use Fees	Promote accuracy and transparency in published fees	<ul style="list-style-type: none"> • Review and update fee schedules • Require pre-application meetings for complex cases • Evaluate collection of payments • Establish credit policy for fees 	<ul style="list-style-type: none"> • Revised fee schedule • Policy for pre-application meeting credits • Updated procedures
	Regulatory Compliance (State Law Alignment)	Remove illegal discretionary barriers and improve predictability	<ul style="list-style-type: none"> • Adopt ADU ordinance • Publish checklists • Create ministerial determination templates • Integrate fire review • Update ambiguity/conflict clauses 	<ul style="list-style-type: none"> • Adopted ordinance amendments • Checklists • Templates • Internal SOPs
Mid-Term 12–24 months	Zoning Capacity and Feasibility	Increase feasibility and capacity through zoning updates	<ul style="list-style-type: none"> • Update density/height standards • Align parking reductions • Reform overlays • Update downtown objective standards 	<ul style="list-style-type: none"> • Zoning code amendments • Updated design standards • Applicant guides
Long-Term 24+ months	Structural Costs & Continuous Improvement	Address structural costs, affordable housing, and ongoing improvement	<ul style="list-style-type: none"> • Establish affordable housing review track • Standardize fee policies • Coordinate infrastructure planning and funding • Implement performance tracking 	<ul style="list-style-type: none"> • Affordable housing SOP • Standardized fee policy • Annual metrics and reporting • Infrastructure coordination plans
Ongoing	Monitoring & Reporting	Ensure ongoing compliance and continuous improvement	<ul style="list-style-type: none"> • Monitor regulatory effectiveness • Review and update policies, ordinances, and procedures as needed 	<ul style="list-style-type: none"> • Annual compliance reviews • Updated ordinances and procedures • Performance metrics



8. Conclusion

These recommendations present a thorough and practical guide for aligning housing streamlining efforts with state law, while simultaneously enhancing the experience of applicants and improving staff efficiency. By focusing on objective standards, conducting early eligibility checks, and establishing clear workflows, especially for affordable housing and ADUs, a range of benefits can be realized: streamlined processes, reduced approval timelines, lower costs, and ultimately increased housing production. Altogether, the strategies outlined help create a more effective, compliant, and user-friendly housing development project.



APPENDIX A – Entitlement Visual Guides

CITY OF IMPERIAL ACCESSORY DWELLING UNIT (ADU)

PROCESSING WORKFLOW



STEP 1

Application and Fee Submittal



A Building Permit is required to construct, enlarge, alter, repair, move, demolish, or change the occupancy of a building or structure within the City. No permit is required for ordinary minor nonstructural repair or remodeling work such as painting, wall papering, cabinets, and similar finish work.

STEP 2

30-day application completeness check



State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

STEP 3

City Staff Evaluation



City review of plans focus only on objective requirements, such as building and life-safety standards, fire access, required setbacks and height limits, and compliance with state ADU regulations. No public hearings are required for approval.

STEP 4

Comments and Corrections



If City staff identifies any issues, the City will provide a written list of required corrections, and you will revise your plans and resubmit the corrected version for review.

STEP 5

Application Approval



Once a complete ADU application is submitted, the City has up to 60 days under state law to approve or deny it. Upon approval, the Building Permit is issued and construction may begin.

STEP 6

Construction and Inspections



During construction, City staff will conduct inspections at key stages to confirm the work matches the approved plans. Any required corrections must be completed before construction can continue.

STEP 7

Final Inspections and ADU Occupancy



After construction is complete, a final inspection is conducted and the City signs off on the work, making the ADU officially legal to occupy.

Application Requirements:

- Site Plan, drawn to scale, to include:
 - Property lines and lot dimensions
 - Location of the primary dwelling
 - Location of the proposed ADU
 - Setbacks (existing and proposed); side and rear setbacks may not exceed 4 feet; no setback required for conversions within existing structures
 - Driveways, parking areas (if any), and access paths
 - Distance between buildings
 - Utility connections (water, sewer, electric)
- Floor Plans, drawn to scale, to include:
 - Room labels and dimensions
 - Kitchen, bathroom, and sleeping areas
 - Doors and windows (sizes and locations)
 - Independent living facilities
 - Fire separation walls (if ADU is attached)
- Building Elevation, drawn to scale, to include:
 - Exterior views of the ADU
 - Building height clearly shown
 - Exterior materials and finishes
 - Roof form and pitch
- Building Sections to include:
 - Wall, floor, and roof assemblies
 - Ceiling heights
 - Fire-resistance ratings (where required)
- Structural Calculations, prepared by a licensed Architect or Engineer, to include:
 - Foundation plan (footings, slabs, reinforcement)
 - Framing plans (walls, floors, roof)
 - Structural connection details
 - Structural calculations
- Mechanical, Electrical, and Plumbing Plans
- Energy and Green Building Documentation
- Fire and Life Safety Plan
- ADU Notes and Declarations to include:
 - Rental term acknowledgment (minimum 30 days)
 - No owner-occupancy requirement for ADUs
 - JADU deed restriction (JADUs only)

Submittal Requirements

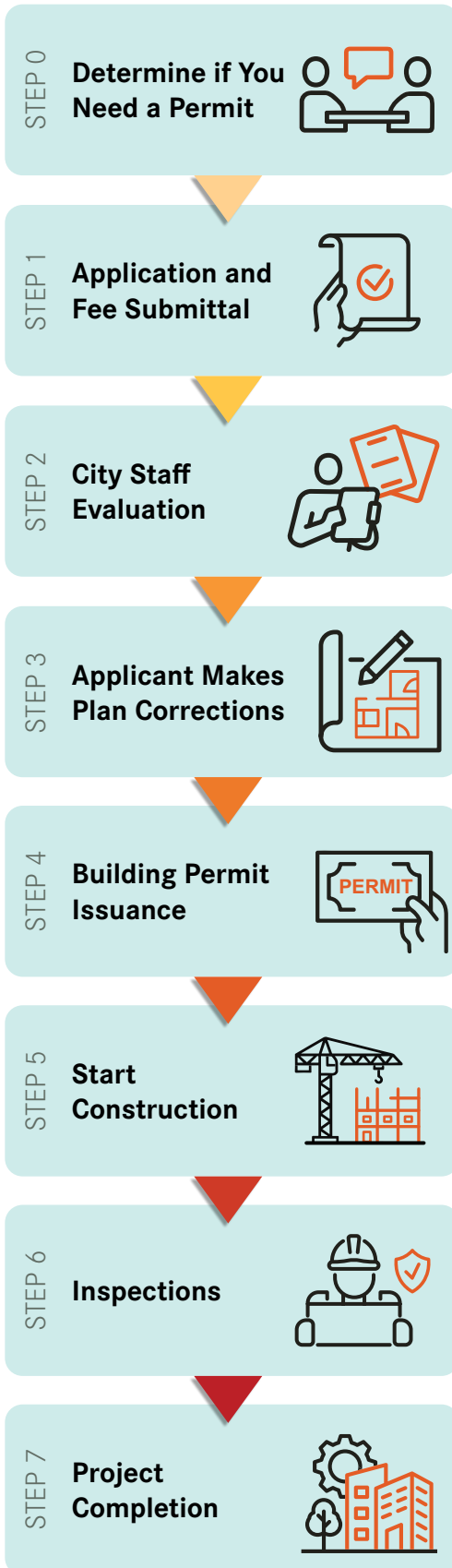
- Paper copies are not required. Please submit all application material digitally via the on-line portal
 - Standard plan size 24" x 36"
 - Consistent sheet numbering and titles
- Illegible, faded, or incomplete plans will not be accepted.

Fees:

- Click link to view [ADU Building Permit Fees](#)
- Click link to view [Water and Sewer Capacity Fees](#)
- Click link to view [Circulation Fees](#)
- Click link to view [Development Impact Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.
- ADU Fire review is required only when sprinklers are required for the existing primary residence.

CITY OF IMPERIAL BUILDING PERMIT

PROCESSING WORKFLOW



A Building Permit is required to construct, enlarge, alter, repair, move, demolish, or change the occupancy of a building or structure within the City. No permit is required for ordinary minor nonstructural repair or remodeling work such as painting, wall papering, cabinets, and similar finish work.

Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

City staff will review your application for safety, code compliance, and completeness of plans; and will tell you how to fix and resubmit anything that is missing.

If changes to your plans are requested by the City, you will need to revise and resubmit your materials for another City review, which may happen more than once depending on the project.

Once your project meets all City requirements, your Building Permit is approved and issued, allowing you to legally begin construction. The permit must be posted at the job site so City inspectors can easily see it.

You may begin work only after the permit is officially issued, and all construction must follow the approved plans. If you want to make changes later, you may need to obtain City approval before proceeding.

During construction, the City inspects the work at key stages. You or your contractor must request inspections and pause work until they are approved. After construction, you then must schedule a final inspection to confirm the project was completed correctly.

Once the final inspection is approved, the permit is officially closed, your project is considered complete and compliant, and the space may be safely and legally used.

Application Requirements:

- Site (Plot) Plan, drawn to scale, to include:
 - Property lines and lot dimensions
 - Location of existing and proposed structures
 - Setbacks from all property lines
 - Driveways, sidewalks, and access points
 - Square footage of existing and proposed buildings
 - Easements, utilities, and right-of-way (if applicable)
- Floor Plans, drawn to scale, to include:
 - Room labels and dimensions
 - Door and window locations and sizes
 - Plumbing fixtures and appliance locations
 - Required life-safety features (smoke alarms, CO detectors, exits)
 - Electrical service location
- Building Cross Sections to include:
 - Cross-sections showing floor-to-ceiling heights
 - Roof, wall, and floor assemblies
 - Structural connections and insulation
- Structural Plan and Calculations
 - Foundation Plan, fully dimensioned footing and slab layout; footing sizes, depths, and reinforcing steel; anchor bolt size, spacing, and type; slab thickness and vapor barrier details
 - Framing Plans and Details, wall, floor, and roof framing sizes and spacing; beams, headers, girders, and posts; Shear walls, bracing, and lateral force-resisting system; connection and fastening details
 - Structural Calculations, required when structural elements exceed prescriptive code limits; wet-signed and stamped by a California-licensed engineer or architect.
- Mechanical, Electrical, and Plumbing Plans
- Energy and Green Building Documentation
- Geotechnical and Soils Report (when required)
- Fire and Life Safety Plan

Submittal Requirements

- Paper copies are not required. Please submit all application material digitally via the on-line portal
 - Standard plan size 24" x 36"
- Illegible, faded, or incomplete plans will not be accepted.

Fees:

- Click link to view [Building Permit Fees](#)
- Click link to view [Water and Sewer Capacity Fees](#)
- Click link to view [Circulation Fees](#)
- Click link to view [Development Impact Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

CITY OF IMPERIAL CONDITIONAL USE PERMIT

PROCESSING WORKFLOW



STEP 0

Pre-Application Review



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

STEP 1

Application and Fee Submittal



Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

STEP 2

30-day application completeness check



State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

STEP 3

City Staff Evaluation



City staff will review your project plans to make sure they meet City requirements and include any required improvements, both on your property and nearby.

STEP 4

Planning Commission Public Hearing



The Planning Commission will hold a noticed public hearing to review the project, discuss any proposed conditions, and hear comments from the community.

STEP 5

10-day appeal period



The Planning Commission's action is final and effective within 10 calendar days unless an appeal to the City Council is filed by the Applicant or any interested party.

STEP 6

Submit Applications & Fees for Building Permits



Apply for a building permit by submitting your application, project plans, basic details, and required fees to the Building Division. CUP Conditions of Approval for the project must be included with the building permit plans.

STEP 7

Construction and Inspections



Applicant to obtain permits for demolition and construction, and schedule all required inspections to ensure project is safe and meet applicable development standards.

STEP 8

Obtain Certificate of Occupancy or Completeness



Upon passing final inspection, City shall issue Applicant a Certificate of Occupancy or Completeness, as appropriate.

Application Requirements:

- Name and Address of Applicant
- Owner or Authorized Agent Form
- Address and legal description of property
- Written statement indicating just how the proposed use aligns with CUP Findings
- Plot plan and elevations, fully dimensioned. Screening, landscape, and irrigation plans shall be included

Fees:

- Click link to view [Conditional Use Permit Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings:

The Planning Commission shall make the following findings before a CUP is granted:

- A. Proposed location, size, design, and operating characteristics of the proposed use aligns with all City development regulations, policies, and guidelines
- B. Proposed location, size, design, and operating characteristics of the proposed use will be compatible with and will not adversely affect adjacent uses
- C. Proposed location, size, design, and operating characteristics of the proposed use will not be detrimental to public health, safety, or welfare to properties in the vicinity
- D. Proposed Conditional Use will comply with each provision of Zoning Code

Conditional Use Permit Duration

- Conditional Use Permits shall expire 1 year after the approval date.
- Conditional Use Permits may be renewed if a written request is made to the Community Development Director and all applicable fees are paid. The Planning Commission may grant or deny a renewal request.
- Conditional Use Permit shall run with the land and remain valid upon a change of ownership of the property, use, structures, or business.

STEP 0

Determine if You Need a Permit

You will need a City-issued Encroachment Permit if your project uses or blocks public areas like streets, sidewalks, or alleys, even if only temporarily.

STEP 1

Application and Fee Submittal

Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

STEP 2

City Staff Evaluation

City staff will review the application for safety, traffic impacts, and compliance with City standards. Other departments (such as Fire or Planning) may also review the request if needed.

STEP 3

Fee Payment and Permit Issuance

Prior to permit issuance, Applicant shall remit all applicable fees to City. Once approved, the City will issue the encroachment permit. All work must follow the approved plans and City conditions.

STEP 4

Obtain a Dig Alert Number

Contractor is responsible for contacting DIG ALERT prior to starting work, if required.

STEP 5

Construction and Inspections

Perform the work as approved. City inspections may occur during and/or after construction to ensure the public area is restored properly.

Application Requirements:

- Applicant/Owner Information
- Contractor Information
- Project Information, including Job Valuation
- Detailed Project Description
- Site or Construction Plans showing area of work
- Traffic Control Plan if streets or sidewalks will be affected
- Proof of Insurance

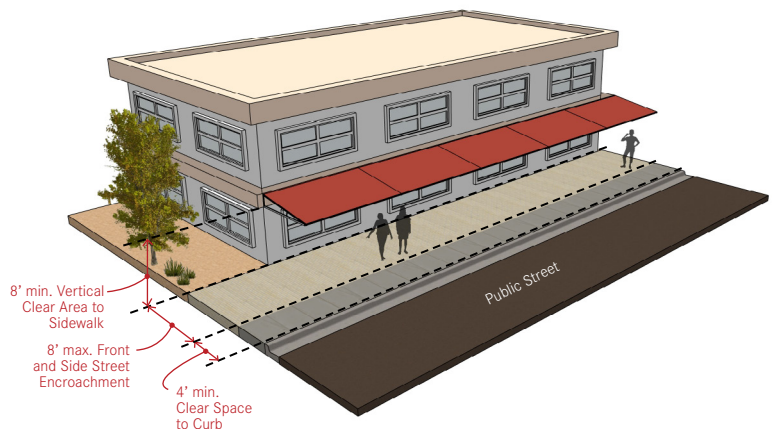
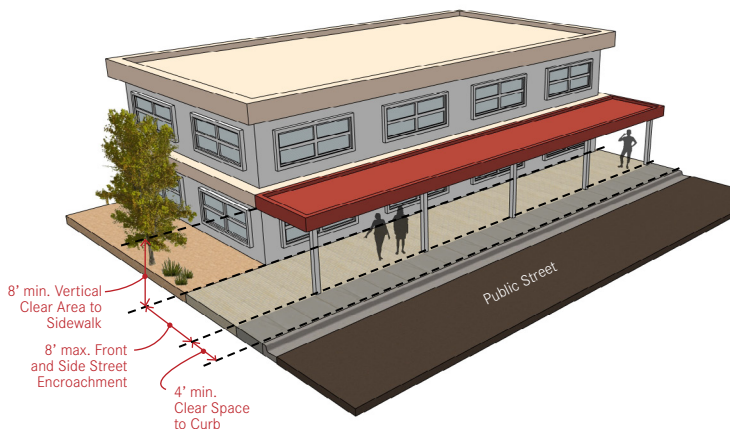
Fees:

- Click link to view [Encroachment Permit Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Special Note: Use /Cost of Consultants

The Community Development Department may bring in outside experts if extra help is needed to review your application. If this happens, you will need to pay for the consulting services, in addition to regular City fees. You may also be asked to keep money on deposit to cover these costs. If the deposit runs out, your application review will pause until it is updated.

EXAMPLES OF ENCROACHMENT



CITY OF IMPERIAL ENGINEERING PERMIT

PROCESSING WORKFLOW



STEP 0

Determine if You Need a Permit



Before applying, first confirm whether your project requires an Engineering Permit. A permit is typically required if your work involves connecting to City water or sewer services, cutting into a street or sidewalk, building a driveway or curb cut, grading land for development, or performing any work within the public right-of-way.

STEP 1

Application and Fee Submittal



Applicant submits completed application, forms, and documents to the Community Development Department.

STEP 2

City Staff Evaluation



City staff will review the application for safety, traffic impacts, and compliance with City standards. Other departments (such as Fire or Planning) may also review the request if needed.

STEP 3

Consultant Plan Check



Outside consultants conduct independent technical engineering review of subdivision applications and provide consolidated plan check comments to City staff for issuance to the Applicant.

STEP 4

Fee Payment and Permit Issuance



Prior to permit issuance, Applicant shall remit all applicable fees to City. Once approved, the City will issue the engineering permit. All work must follow the approved plans and City conditions.

STEP 5

Construction and Inspections



Perform the work as approved. City inspections may occur during and/or after construction to ensure the public area is restored properly.

Application Requirements:

- Applicant/Owner Information
- Contractor Information
- Project Information, including **Job Valuation**
- Detailed Project Description
- Site or Construction Plans showing area of work
- Traffic Control Plan if streets or sidewalks will be affected
- Proof of Insurance

Fees:

- Click link to view [Engineering Permit Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Special Note: Use /Cost of Consultants

The Community Development Department may bring in outside experts if extra help is needed to review your application. If this happens, you will need to pay for the consulting services, in addition to regular City fees. You may also be asked to keep money on deposit to cover these costs. If the deposit runs out, your application review will pause until it is updated.

CITY OF IMPERIAL FINAL MAP

PROCESSING WORKFLOW



A Final Map **must** be prepared by a licensed, professional Land Surveyor or Engineer. This ensures the map is accurate and can be officially recorded.

Applicant submits completed application, approval Tentative Map, and all applicable supporting documents and fees/deposits to the Community Development Department.

State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

City staff will confirm the map matches the approved Tentative Map and complies with all conditions, City standards, and State law.

Outside consultants conduct independent technical engineering review of subdivision applications and provide consolidated plan check comments to City staff for issuance to the Applicant.

The Final Map is scheduled for City Council approval as a Consent Agenda item. Council confirms all legal and technical requirements have been met and authorizes the map to be officially recorded.

After City Council approval, the map is recorded with the Imperial County Recorder, officially making the subdivision legal. Once recorded, lots can be sold or transferred, building permits can be applied for and issued, and construction of homes or buildings can commence.

Application Requirements:

- Completed Application
- Final Map, professional preprepared
- Improvement Plan (roads, sidewalks, utilities, drainage)
- Legal agreements (CCRs)
- Proof that required fees, bonds, or securities are in place

Fees:

- Click link to view [Final Map Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings

The City Council shall make the following findings before a Final Map is granted:

- A. Final Map is substantially consistent with the approved Tentative Map, including its design, lot configuration, street layout, and conditions of approval.
- B. All conditions of approval imposed on the Tentative Map have been satisfied or will be satisfied through the recordation of the Final Map, improvement plans, agreements, or conditions of approval.
- C. Final Map complies with the requirements of the California Subdivision Map Act and all applicable State laws.
- D. Final Map complies with the City of Imperial Subdivision Ordinance, Zoning Ordinance, and Engineering Design Standards.
- E. Final Map has been prepared by a licensed land surveyor or civil engineer, is technically correct, and accurately represents the subdivision boundaries, lot dimensions, easements, and dedications.
- F. All required public rights-of-way, easements, and dedications for streets, utilities, drainage, and other public purposes are properly shown on the Final Map.
- G. Required public and private improvements have either been constructed and accepted by the City or adequately secured through improvement agreements, bonds, or other financial guarantees.
- H. Final Map provides adequate access, circulation, and utility infrastructure to serve the subdivision.
- I. Final Map is consistent with the project's prior CEQA environmental determination.
- J. Final Map has been submitted within the time limits established by the Subdivision Map Act and any approved extensions of the Tentative Map.
- K. Final Map meets all requirements for recordation and acceptance by the City Council, including approval by the City Engineer, Community Development Director, and City Attorney.

FIRE SITE PLAN REVIEW CHECKLIST



MULTIFAMILY RESIDENTIAL (3+ UNITS), RESIDENTIAL TRACT DEVELOPMENTS, COMMERCIAL AND INDUSTRIAL PROJECTS

Please provide property and/or use information and check **Yes** or **No** to questions below based on your proposed project. Submit the completed form with your entitlement or development application. This form is a screening tool only; it is not exhaustive and may not address all project conditions. Additional Fire Code review or documentation may be required by the Imperial County Fire Department.

PROJECT INFORMATION

Address: Suite: City:

Project Scope / Business Description:

QUESTIONNAIRE

	Yes	No	
1.	<input type="checkbox"/>	<input type="checkbox"/>	Construction of a new building, a new story, or increase the footprint of an existing building? Changes to roadways, curbs, or drive aisles? Addition, relocation, or modification of fire hydrants or fences/gates?
2.	<input type="checkbox"/>	<input type="checkbox"/>	Is the structure greater than 150 feet from fire access roadways?
3.	<input type="checkbox"/>	<input type="checkbox"/>	Is the project going to be built in phase or master build out?
4.	<input type="checkbox"/>	<input type="checkbox"/>	Installation/modification/repair of underground piping, backflow preventers, or fire department connections serving private fire hydrant/sprinkler/standpipe systems? Is there a fire hydrant within 300 feet along an approved fire access route to the property to ensure 150 feet hose pull to be achieved
5.	<input type="checkbox"/>	<input type="checkbox"/>	Drinking/dining/recreation/meetings/training/religious functions or other gatherings in a room > 750 sq.ft. (> 1,000 sq.ft. for training/adult education) or > 49 people? Healthcare/outpatient services for > 5 people who may be unable to immediately evacuate without assistance? Education for children (academic tutoring for ages 5+ is exempt unless classified as an E occupancy by the Building Official)? Adult/child daycare? 24-hour care/supervision? Incarceration or restraint? Hotel/apartment or residential facility with 3+ units and 3+ stories (3-story townhouses/rowhouses where an independent direct exit to grade is provided for dwelling are exempt)? Congregate housing/dormitories with 17+ people? High-rise structure (75+ feet to highest occupied floor level)?
6.	<input type="checkbox"/>	<input type="checkbox"/>	Installation/modification of locks delaying or preventing occupants from <u>leaving</u> a space or requiring use of a card, button, or similar action to open a door <u>in the direction of exit travel</u> ?
7.	<input type="checkbox"/>	<input type="checkbox"/>	Installation/modification/use of spray booths; dust collection; dry cleaning; industrial ovens/drying equipment; industrial/commercial refrigeration systems; compressed gasses; tanks for cryogenic or flammable/combustible liquids; vapor recovery; smoke control; battery back-up/charging systems (>20 kWh lithium-ion or 70 kWh lead-acid; >15 cubic feet of lithium battery storage); welding/brazing/soldering, open flame torches, cutting/grinding; or other similar operations?
8.	<input type="checkbox"/>	<input type="checkbox"/>	Storage/use/research with flammable/combustible liquids or other chemicals? Motor vehicle/aircraft maintenance/repair? Cabinetry/woodworking/finishing facility? Chem Class & floor plan (<i>full architectural plan if H occupancy</i>)
9.	<input type="checkbox"/>	<input type="checkbox"/>	Storage or merchandising areas in excess of 500 sq. ft. where items are located higher than 12' (6' for high-hazard commodities, plastic, rubber, foam, etc.)?
10.	<input type="checkbox"/>	<input type="checkbox"/>	Cooking under a Type I commercial hood; installation or modification of a fire extinguishing system located in a commercial cooking hood ?

SUBMITTAL REQUIREMENTS

(Two (2) hard copies, 24" x 36" in size; and one (1) PDF file containing full plan set)

- Fire access roadways with dimensions and turning radius information
- Location of access roadways in relation to the buildings on site
- Information regarding roadway arial clearance, slope and weight support capabilities
- Knox Box location
- Location and dimensions of all existing structures and proposed
- Identify existing and proposed water mains and fire hydrants

FIRE SITE PLAN REVIEW CHECKLIST



REQUIRED FOR SINGLE FAMILY, DUPLEX RESIDENCES, AND ACCESSORY DWELLING UNITS (ADU)

Please provide property and/or use information and check **Yes** or **No** to questions below based on your proposed project. Submit the completed form with your entitlement or development application. This form is a screening tool only; it is not exhaustive and may not address all project conditions. Additional Fire Code review or documentation may be required by the Imperial County Fire Department.

PROJECT INFORMATION

New Single Family Residence / Duplex Addition/Remodel ADU Other:

Address: Unit #: ZIP:

Scope of Work:

Existing Area: Area to be added: Total resulting area: Stories: Area Added in Past 2 Years (excluding this project):

QUESTIONNAIRE

	Yes	No	
1.	<input type="checkbox"/>	<input type="checkbox"/>	New - Is this a new single family residence or duplex, or detached Accessory Dwelling Unit (ADU)?
2.	<input type="checkbox"/>	<input type="checkbox"/>	ADU - Is this a new ADU on the same property as a house that already has fire sprinklers or a house that will have fire sprinklers added as part of this project?
3.	<input type="checkbox"/>	<input type="checkbox"/>	Addition - Is this an addition to a currently sprinklered building or an addition requiring a fire sprinkler retrofit based on a threshold set by local ordinance?
4.	<input type="checkbox"/>	<input type="checkbox"/>	Distance - Is the most remote portion of the addition, ADU or other detached structure greater than 150-feet from the fire access roadway?
5.	<input type="checkbox"/>	<input type="checkbox"/>	Total Area - Will the addition result in a total area of greater than 3,600 square feet (sf) for non-sprinklered buildings, or greater than 6,200 sf for sprinklered buildings, including the area of all enclosed spaces, such as garages, stairs, and detached structures separated by less than 10-feet?
6.	<input type="checkbox"/>	<input type="checkbox"/>	Remodel - Is this a remodel of a sprinklered building with a scope of work that includes adding or removing any interior walls?
7.	<input type="checkbox"/>	<input type="checkbox"/>	Detached Structure - Is this a new detached utility or accessory structure (not an ADU), such as a garage, workshop, game room, pool house, barn, etc., requiring fire sprinklers based on a threshold set by local ordinance?
8.	<input type="checkbox"/>	<input type="checkbox"/>	Gate - Is a gate being installed across a driveway or road that is designated as a fire department access roadway, or a driveway or road that serves more than a single home/duplex?

SUBMITTAL REQUIREMENTS

(Two (2) hard copies, 24" x 36" in size; and one (1) PDF file containing full plan set)

- Fire access roadways with dimensions and turning radius information
- Location of access roadways in relation to the buildings on site
- Information regarding roadway arial clearance, slope and weight support capabilities
- Knox Box location
- Location and dimensions of all existing structures and proposed
- Identify existing and proposed water mains and fire hydrants

CITY OF IMPERIAL GENERAL PLAN AMENDMENT

PROCESSING WORKFLOW



GENERAL PLAN AMENDMENT

The General Plan is the City of Imperial's long-term rulebook that guides where housing, businesses, roads, parks, and other land uses should be located over time. A General Plan Amendment is needed when someone wants to change what a property is planned to be used for (such as from agriculture to housing) or when a proposed project does not align with the City's current long-term vision.

This is a policy decision only and does not authorize any construction.

STEP 0

Pre-Application Review



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

STEP 1

Application and Fee Submittal



Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

STEP 2

30-day application completeness check



State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

STEP 3

City Staff Evaluation



City staff will review your documentation to ensure consistency with the adopted General Plan policies and applicable regulations. State law also requires the City to study how the proposed change could impact the environment.

STEP 4

Planning Commission Public Hearing



The Planning Commission will hold a noticed public hearing to review the request and make a recommendation to the City Council. Public hearing notices will be mailed to all owners of property within 300 feet of the subject property.

STEP 5

City Council Public Hearing



Within 30 days after the Planning Commission's decision, the City Council will hold a noticed public hearing to consider the Planning Commission's actions. The City Council's action to approve or deny is final.

Application Requirements:

- Name and Address of Applicant
- Owner or Authorized Agent Form
- Address and legal description of property
- Plot plan, drawn to scale, showing the site and surrounding areas, existing streets, and property lines. The Community Development Director shall determine the area to be included on the plan to show the relationship to and impact on surrounding areas.
- Complete environment assessment and applicable technical studies for compliance with State law.

Fees:

- Click link to view [General Plan Amendment Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings:

The Planning Commission and City Council shall make one of the following findings before taking action on a General Plan Amendment:

- A. Proposed amendment is Consistent with the goals, objectives, and policies of the City's General Plan.
- B. Proposed amendment is compatible with the surrounding area and will not create land use conflicts with nearby properties.
- C. Evidence that public services and infrastructure (roads, water, sewer, schools, emergency services) can be provided to serve the proposed land use change without placing an undue burden on existing residents or businesses.
- D. Project has been reviewed in compliance with the California Environmental Quality Act (CEQA) and appropriate environmental document has been prepared and adopted.

CITY OF IMPERIAL SITE PLAN REVIEW

PROCESSING WORKFLOW



STEP 0

Pre-Application Review



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

STEP 1

Application and Fee Submittal



Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

STEP 2

30-day application completeness check



State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

STEP 3

City Staff Evaluation & Director's Determination



City staff will review your project plans to make sure they meet City requirements and include any required improvements, both on your property and nearby. Within 15 days of the application completeness determination, the Director shall approve, conditionally approve, or deny the application.

STEP 4

10-day appeal period



Any applicant or interested party may appeal a Director's decision to the City Planning Commission within 10 calendar days of the Director's determination, subject to payment of appeal fees.

STEP 5

Submit Applications & Fees for Building Permits



Submit a Building Permit application along with basic project information, plans, and applicable fees to the City of Imperial Community Development Department.

STEP 6

Construction and Inspections



Applicant to obtain permits for demolition and construction, and schedule all required inspections to ensure project is safe and meet applicable development standards.

STEP 7

Obtain Certificate of Occupancy or Completeness



Upon passing final inspection, Applicant shall obtain a Certificate of Occupancy or Completeness, as appropriate.

Applicability:

Prior to issuance of any building permit for development, a Site Plan Review shall be required for:

- Single-family residential homes
- Mobile homes on permanent foundations
- Mobile home parks
- Multiple family developments
- Commercial or industrial establishments

Application Requirements:

- Site Plan, drawn to scale
- Concept Landscape Plan, drawn to scale
- Architectural Drawings (floor plans, elevations), drawn to scale
- Conceptual Grading and Drainage Plans
- Other such related material required by the Director

Fees:

- Click link to view [Site Plan Review Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Site Plan Review Permit Duration:

- Site Plan Review approval shall expire 1 year after the approval date.
- If development under the Site Plan Review does not start within the 1 year period, applicants may request two 6 month extensions. Applications cannot be extended beyond 2 years from the original approval date.
- If development does not commence within the initial or extended periods, the Site Plan Review approval will be voided.

CITY OF IMPERIAL TENTATIVE MAP

PROCESSING WORKFLOW



Before preparing a map, property owners and/or developers are strongly encouraged to meet with Community Development Department to understand basic requirements and design standards. This early conversation helps avoid expensive redesigns and explains what the City will expect.

Contact the Community Development Department to obtain a Tentative Map number, pay the required map filing fee, and submit application and all applicable forms.

State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

City staff will review your project plans to make sure they meet City requirements and include any required improvements, both on your property and nearby. City will distribute the proposed map to internal departments and outside agencies.

Outside consultants conduct independent technical engineering review of subdivision applications and provide consolidated plan check comments to City staff for issuance to the Applicant.

The Planning Commission will hold a noticed public hearing to review the project, discuss any proposed conditions, and hear comments from the community. After the public hearing, the Planning Commission will make a recommendation to the City Council.

The City Council will hold a public hearing to review the recommendation made by the Planning Commission, hear public testimony, and render a final decision on the Tentative Map request.

After your Tentative Map has been approved by the City Council, you may then have a licensed land surveyor or engineer prepare and submit the Final Map for approval by the Community Development Department. See FINAL MAP process workflow guide for more details.

Application Requirements:

- Completed Application
- Proof of Ownership
- Title Report (current within the last 1 year)
- Vicinity Map (300-foot radius)
- Tentative Map Number (issued by City Engineer)
- Tentative Map drawn to scale and fully dimensioned. Map clearly showing the following:
 - Property boundaries and lot lines
 - Proposed streets and their widths
 - Utility locations (water, sewer, drainage)
 - Existing buildings and infrastructure
 - Surrounding land uses
 - Topography
 - Areas proposed for public use (parks, easements)

Fees:

- Click link to view [Tentative Map Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

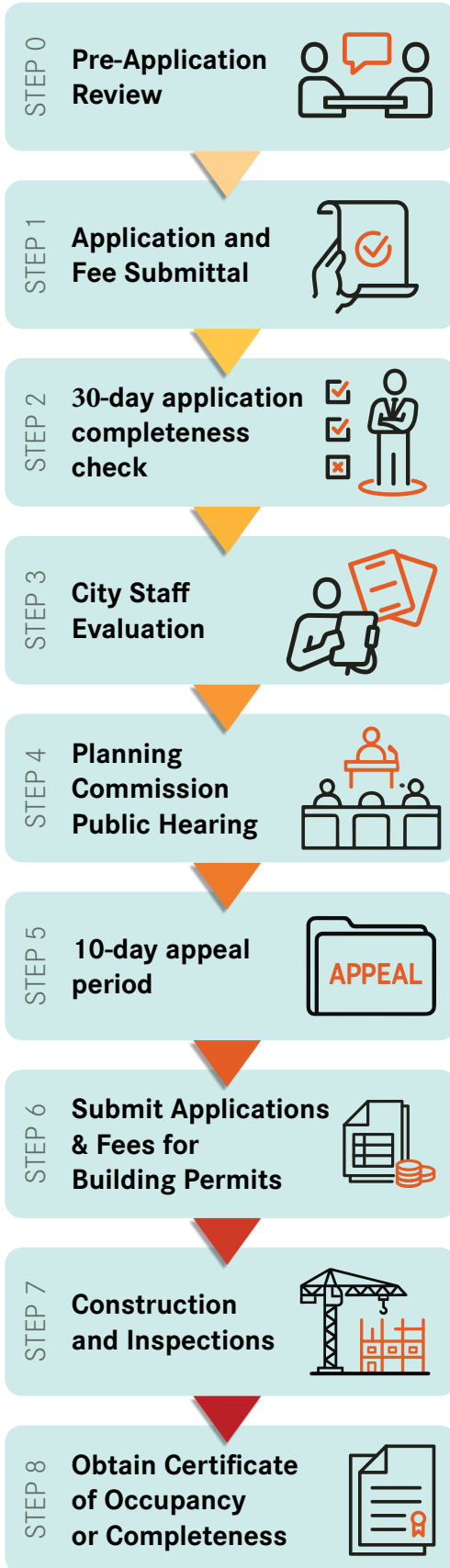
Findings

The Planning Commission shall make the following findings before a Tentative Map is granted:

- A. Proposed Tentative Map is consistent with the goals, policies, and land use designation of the City of Imperial General Plan.
- B. Proposed subdivision is consistent with the City of Imperial Zoning Ordinance.
- C. The site is physically suitable for the proposed type and density of development, considering its size, shape, topography, location, and environmental characteristics.
- D. Each lot created by the Tentative Map is suitable for its intended use and is of adequate size and configuration to support development in compliance with City standards.
- E. The design of the subdivision and the proposed improvements will not be detrimental to the public health, safety, or welfare, nor injurious to property or improvements in the vicinity.
- F. The Tentative Map does not conflict with existing public or private easements.
- G. The subdivision provides adequate vehicular, pedestrian, and emergency access, and is consistent with City street standards.
- H. Public services and utilities, including water, sewer, drainage, fire protection, police services, and public roads, are available or can be provided to serve the subdivision.
- I. The project has been reviewed in compliance with the California Environmental Quality Act (CEQA).
- J. Tentative Map complies with the City of Imperial Subdivision Ordinance and Engineering Design Standards.
- K. The subdivision design will not cause substantial environmental damage.

CITY OF IMPERIAL VARIANCE REQUEST

PROCESSING WORKFLOW



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

City staff will review your project plans to make sure they meet City requirements and include any required improvements, both on your property and nearby.

The Planning Commission will hold a noticed public hearing to review the project, discuss any proposed conditions, and hear comments from the community.

The Planning Commission's action is final and effective within 10 calendar days unless an appeal to the City Council is filed by the Applicant or any interested party.

Apply for a building permit by submitting your application, project plans, basic details, and required fees to the Building Division. Variance Conditions of Approval for the project must be included with the building permit plans.

Applicant to obtain permits for demolition and construction, and schedule all required inspections to ensure project is safe and meet applicable development standards.

Upon passing final inspection, City shall issue Applicant a Certificate of Occupancy or Completeness, as appropriate.

Application Requirements:

- Name and Address of Applicant
- Owner or Authorized Agent Form
- Address and legal description of property
- Written statement describing the practical difficulty or physical hardship that would result from the strict and/or literal interpretation and enforcement of the Zoning Ordinance
- Plot plan, drawn to scale and fully dimensioned, showing location of all streets, property lines, uses, structures, driveways, sidewalks, off-site parking, and landscaped areas

Fees:

- Click link to view [Variance Request Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings:

- A. The Planning Commission shall make all of the following findings before a Variance request is granted:
- B. There are special circumstances applicable to the property (size, shape, topography, location, and surroundings) that the strict application of the Zoning Ordinance would deprive the property privileges enjoyed by other properties under the same Zoning.
- C. Granting the Variance is necessary for preservation and enjoyment of property rights possessed by other property in the same vicinity and zone.
- D. Granting the Variance will not be materially detrimental to public health, safety, or welfare, or damaging to other property or improvements in the same vicinity and zone.
- E. Granting the Variance does not award a special privilege that is inconsistent with the Zoning Ordinance.
- F. Granting the Variance does not allow a use or activity that is prohibited by the Zoning Ordinance.
- G. Granting the Variance will not be incompatible with the City's General Plan.

Variance Duration

- Variance will be voided 1 year after the date of approval if a building permit is not issued or construction has not commenced under the requested Variance.
- Variance may be renewed for an additional year if a written request is made to the Community Development Director and all applicable fees are paid prior to Variance expiration date. The Planning Commission may grant, conditionally grant, or deny a renewal request.
- Approval of Variance may be revoked by the Planning Commission if evidence of non-compliance with Conditions of Approval is presented.

CITY OF IMPERIAL ZONING MAP AMENDMENT

PROCESSING WORKFLOW



STEP 0

Pre-Application Review



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

STEP 1

Application and Fee Submittal



Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

STEP 2

30-day application completeness check



State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

STEP 3

City Staff Evaluation



City staff will review your documentation to ensure consistency with the Zoning Ordinance and General Plan.

STEP 4

Planning Commission Public Hearing



The Planning Commission will hold a noticed public hearing to review the request within 40 days after the completion of all environmental assessment documentation. Public hearing notices will be mailed to all owners of property within 300 feet of the subject property.

STEP 5

City Council Public Hearing



Within 30 days after the Planning Commission's decision, the City Council will hold a noticed public hearing to consider the Planning Commission's actions. The City Council's action to approve or deny is final.

Application Requirements:

- Name and Address of Applicant
- Owner or Authorized Agent Form
- Address and legal description of property
- Plot plan, drawn to scale, showing the site and surrounding areas, existing streets, and property lines. The Community Development Director shall determine the area to be included on the plan to show the relationship to and impact on surrounding areas.
- Complete environment assessment and applicable technical studies for compliance with State law.

Fees:

- Click link to view [Zoning Map Amendment Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings:

The Planning Commission shall make one of the following findings before taking action on a Zoning Map Amendment:

- A. The Planning Commission finds the Zone change is consistent with the objectives of the Zoning Ordinance, General Plan, and other applicable development policies, and recommends approval to the City Council; or
- B. The Planning Commission finds the Zone change is inconsistent with the objectives of the Zoning Ordinance, General Plan, and other applicable development policies, and recommends to the City Council denial of the request, continue the public hearing so changes to the proposal can be made, or outright reject the proposal.

ZONING REGULATIONS/ TEXT AMENDMENT

PROCESSING WORKFLOW



Pre-Application Review meetings are not required but are strongly encouraged as this early coordination leads to clearer expectations, higher-quality projects, and faster overall approvals.

Applicant submits completed application, forms, documents, and all applicable fees/deposits to the Community Development Department.

State law gives the City 30 business days to check that an application includes all required forms, documents, and fees. If anything is missing, the applicant must provide additional information before review begins.

City staff will review your documentation to ensure consistency with the Zoning Ordinance and General Plan.

The Planning Commission will hold a noticed public hearing to review the request and make a recommendation to the City Council. Public hearing notices will be mailed to all owners of property within 300 feet of the subject property.

Within 30 days after the Planning Commission's decision, the City Council will hold a noticed public hearing to consider the Planning Commission's actions. The City Council's action to approve or deny is final.

Application Requirements:

- Name and Address of Applicant
- Owner or Authorized Agent Form
- Address and legal description of property
- Plot plan, drawn to scale, showing the site and surrounding areas, existing streets, and property lines. The Community Development Director shall determine the area to be included on the plan to show the relationship to and impact on surrounding areas.
- Complete environment assessment and applicable technical studies for compliance with State law.

Fees:

- Click link to view [Zoning Regulations / Text Amendment Fees](#)
- All applicable fees must be remitted before City can commence application processing.
- Fire Department Fees are paid and processed separately from the Community Development Department.

Findings:

The Planning Commission shall make one of the following findings before taking action on a Zoning Map Amendment:

- A. The Planning Commission finds the Zone change is consistent with the objectives of the Zoning Ordinance, General Plan, and other applicable development policies, and recommends approval to the City Council; or
- B. The Planning Commission finds the Zone change is inconsistent with the objectives of the Zoning Ordinance, General Plan, and other applicable development policies, and recommends to the City Council denial of the request, continue the public hearing so changes to the proposal can be made, or outright reject the proposal.

CITY OF IMPERIAL ZONING VERIFICATION LETTER

PROCESSING WORKFLOW



****IMPORTANT****

A Zoning Verification Letter reflects zoning rules in effect on the date of the letter. It does not constitute a project approval. It does not replace permits. If zoning laws change later, the letter does not override new rules.

STEP 0

**Confirm You
Need a Zoning
Verification
Letter**



Needed when a lender, buyer, or investor needs written confirmation of the property's zoning, when you want official verification of what uses or development are allowed on the site, or when formal documentation is required to support legal, financial, or business decisions.

STEP 1

**Request and
Fee Submittal**



Provide the required materials, including a completed request form (if applicable), the relevant property information, and payment of the required fee. Requests may be accepted over the counter, by email, or through an online submission system.

STEP 2

**City Staff
Evaluation**



City staff will verify the property's zoning and applicable regulations using existing City records only; no site visits or inspections are conducted.

STEP 3

**Zoning Verification
Letter Issuance**



Once the evaluation is complete, the City will issue the letter and provide it by email, mail, or in-person pickup. Processing times vary based on workload, but City staff can typically provide an estimated timeframe when you submit your request.

Application Requirements:

- Property Address
- Assessor's Parcel Number (APN) found on tax bill or county records)
- Description of why you need the letter

No plans or technical drawings needed.

Fees:

- Click link to view [Zoning Verification Letter Fees](#)
- All applicable fees must be remitted before City can commence application processing.

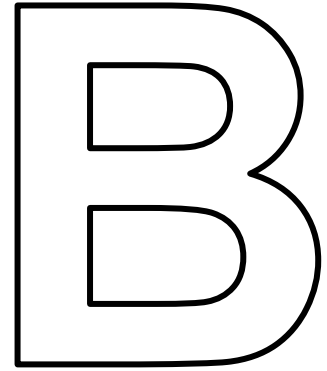
SAMPLE ZONING
VERIFICATION LETTER

ZONING VERIFICATION LETTER
COMMUNITY DEVELOPMENT DEPARTMENT
CITY OF IMPERIAL

Subject Property: 1234 N. Imperial Ave, Imperial, CA, 92251 APN 123-456-789

In response to your request for information regarding the above-referenced property, we have researched our files and present the following:

- The current zoning classification for the subject property is:** C-1 Commercial Neighborhood
- Adjacent property zoning designations:**
 North: C-2 Commercial Neighborhood South: C-1 Commercial Neighborhood
 East: PUD- Planned Unit Development West: Not within City of Imperial
- According to the zoning ordinances and regulations for this district, the current use of the subject property is as:**
 Permitted Use by Right
 Permitted Use by Special/Specific Use Permit Copy Attached Copy Not Available (see comment)
 Legal Non-Conforming Use (no longer permitted by right due to amendments, re-zoning, variance granted or other changes. See comments)
 Non-Permitted Use
 Comment:
- To the best of our knowledge, the proposed Uses: "Healthcare Clinic"**
 Are in accordance with Current Zoning Code Requirements and is:
 Legal Conforming Use.
 Non-conforming Use (see comments).
 in accordance with Previous Zoning Code Requirements (amendments, rezoning, variance granted) and is
 Legal Non-conforming to current zoning requirements.
 Prior to the adoption of the Zoning Code and is Grandfathered/Legal Non-conforming to current zoning requirements.
 in accordance with Approved Site Plan and is Legal Conforming to approved site plan. If any nonconforming issues exist with respect to current zoning requirement; the subject property would be considered legal non-conforming.
 Comment:
- Information regarding variances, special permits/exceptions, ordinances or conditions:**
 There do not appear to be any variances, special permits/exceptions, ordinances or conditions that apply to the subject property.
 The following apply to the subject property (see comments):
 Variance - Documentation attached or is otherwise, no longer available (see comment)
 Special Permit/Exception Documentation attached or is otherwise, no longer available (see comment)
 Ordinance Documentation attached.
 Conditions Documentation attached or is otherwise, no longer available (see comment)



APPENDIX B – Stakeholder Interview Summaries

Project Name:	SRP 2.0 Imperial - Stakeholder Interview Summary Group 1: Building Division and Fire Department
Date/Time/Location:	Tuesday, March 3, 2026, 2:00 pm – 3:00 pm, MS Teams
GHD Facilitators:	Brady Woods: Senior Project Manager Kayla Rashad: Planner

STAKEHOLDER INTERVIEW SUMMARY

– Group 1: Building Division and Fire Department Participants

- Cody Cole: City of Imperial, Building & Code Enforcement Supervisor (~13 years with City)
- Rosalio Villapudua: City of Imperial, Building Inspector (~1 month with City)
- Hector Salcedo: City of Imperial, Project Manager/Engineering
- Andrew Loper: Imperial County Fire Department, Fire Prevention (~13 years in fire prevention)
- Yvonne Cordero: City of Imperial, Planner (~4 years)

– Key Topics of Discussion (Cross-Cutting Themes)

A. Current Permitting Workflow

- Applications typically submitted at the front counter and entered into the City’s permitting software (currently CitizenServe)
- Reviews are routed internally (building, planning, engineering)
- Fire Department receives plans outside the system, via email or PDFs, due to lack of system access
- After approvals, manual follow-up is often needed to ensure conditions and comments are communicated properly

B. System Limitations

- Lack of integration between City and County Fire Department systems creates delays
- Permitting software does not always function as intended (e.g., comments not automatically bundled with permits)
- Redundant steps: staff must separately notify front counter staff after completing reviews
- Heavy reliance on email creates tracking and version-control issues

C. Incomplete Applications

- Fire Department reviews are often the longest due to a) Contractual status (not embedded in City system); and b) Regional workload across multiple jurisdictions
- Incomplete submittals significantly extend review timelines across all departments

D. Review Delays and Redundancies

- Common issue across departments: missing or insufficient information at submittal
- No standardized public-facing checklists for a) Building permits (e.g., patios, room additions, ADUs), and b) Engineering permits (e.g., grading triggers)
- Applicants often submit hand-drawn plans lacking basic elements (foundation, framing, MEP, site plans).
- Applicants are confused about a) What type of permit is required? and b) What triggers additional permits (engineering, grading, fire)?

STAKEHOLDER INTERVIEW SUMMARY

E. Affordable Housing / Housing Projects

- Limited experience within Building Division so far
- Fire Department has more exposure but emphasized that early completeness and coordination are critical
- No indication that code requirements themselves are the primary barrier; however, process clarity is

– Building Division

- A. Identified missing information as the single biggest bottleneck
- B. Confirmed no formal checklists currently exist
- C. Noted that allowing hand-drawn plans increases correction cycles
- D. Actively pursuing replacement of CitizenServe with GovWell, an AI-enabled permitting system
- E. Highlighted GovWell features:
 - Applicant-facing submittal checklists
 - AI pre-plan checks (e.g., zoning setbacks flagged automatically)
 - Automated comments embedded directly on plans

– Engineering Division

- A. Described the process as generally clear, but technically flawed
- B. Identified system failures where:
 - Comments don't consistently follow permits
 - Staff must manually repeat work
- C. Applicants are often confused about:
 - What triggers engineering or grading permits
- D. Engineering has internal thresholds (e.g., 5,000 sf impervious / 10,000 sf disturbance) but these are not publicly documented

– Fire Department

- A. Permits move fastest when information is correct the first time
- B. Reviews are delayed primarily due to:
 - Incomplete submittals
 - External workflow (email-based, not system-based)
- C. Fire Department strongly advocated for:
 - Complete submittal checklists
 - A single, centralized review platform
- D. County Fire is transitioning to Tyler systems and Bluebeam for plan review

– General Reform Themes Identified by Staff

- A. Predictability over speed: Staff want fewer surprises rather than rushed timelines.
- B. Front-loaded clarity: The more applicants know at the start, the faster approvals move.

STAKEHOLDER INTERVIEW SUMMARY

- C. Technology as an enabler, not a barrier: Must accommodate both digital and walk-in users.
- D. Consistency across departments: Unified standards reduce internal and external friction.

– Potential Reform Tools Discussed

A. Internal / Technical Tools

1. Integrated Permitting Software
 - Shared Single platform
 - Eliminates email-based workflows
2. AI-Assisted Plan Review
 - Early detection of zoning/code mismatches
 - Automated completeness checks
3. Centralized Comment & Condition Tracking
 - All review comments attached to the permit and visible to applicants
 - Reduces redundant staff communication
4. Standardized Intake Protocols
 - “Complete application” screening before routing to reviewers
5. Digital Plan Review Tools
 - Tyler and Bluebeam transition (County Fire Department)
 - Compatibility with City-selected platform

B. Public-Facing Tools

1. Permit-Specific Submittal Checklists
 - Building permits (patios, room additions, ADUs)
 - Engineering permits (grading, civil improvements)
 - Fire plan requirements (sprinklers, access)
2. Visual Process Guides
 - Step-by-step “how to apply” flowcharts
 - Clear triggers for when additional permits/reviews are required

Project Name:	SRP 2.0 Imperial - Stakeholder Interview Summary Group 2: Engineering Division
Date/Time/Location:	Thursday, March 5, 2026, 10:00 am – 11:00 am, MS Teams
GHD Facilitators:	Brady Woods: Senior Project Manager Kayla Rashad: Planner

STAKEHOLDER INTERVIEW SUMMARY

– Group 2: Engineering Division Participants

Denise Goff: City of Imperial, Engineering Administrative Intake Assistant (~1 year with the City)

– Key Topics of Discussion

A. Current Engineering & Permit Intake Process

- Intake and review process is generally straightforward and functional
- City staff provide significant hands-on assistance to applicants, especially for homeowners and first-time or non-professional applicants
- Applications are not accepted as “complete” until all required documents are submitted, which staff feel helps streamline downstream review

B. Application Completeness & Review Timing Limitations

- Engineering generally follows a 30-day completeness review timeframe, similar to planning
- In practice, timelines vary based on a) emergency utility work (e.g., gas leaks), b) utility company projects (SoCalGas, telecom providers); and c) right-of-way work vs. private property improvements
- Engineering staff often prioritize projects based on urgency and safety, rather than rigid timelines

C. Common Application Deficiencies

- Incomplete or insufficient site plans, including a) missing dimensions, b) lack of scale; and c) inadequate detail
- Applicants often do not understand what a “complete” site plan requires
- Hand drawn plans are still accepted, which can increase review time and require additional follow-up and clarification

D. Applicant Confusion & Pain Points

- How to prepare a site plan
- What level of detail is required
- Where to obtain required documents
- Knowing which professional or consultant they should contact
- Understanding who to talk to within the City for specific questions

E. Interdepartmental Coordination

- Engineering rarely requires approvals from other departments
- Engineering functions largely independently for right-of-way work

F. Technology, Systems, and Workflow Limitations

- No major internal workflow or software barriers identified

STAKEHOLDER INTERVIEW SUMMARY

- Key challenges relate to applicant capability, not City systems: Older residents often struggle with electronic submittals. Some applicants lack email access altogether

– General Reform Themes Identified by Staff

- A. Applicant preparedness is the primary driver of delays
- B. Front-end tools (visual guides, checklists, examples) would:
 - Reduce repeat visits
 - Minimize incomplete submittals
 - Save staff time
- C. Improvements should focus on clarity, not restriction

– Potential Reform Tools Discussed

- A. Visual Application Guides
 1. Step-by-step diagrams showing a) Application flow; and b) Intake-Review-Approval
 2. Particularly helpful for non-professional applicants
- B. Standardized Checklists
 1. Clear, written checklists for a) Encroachment permits, b) Grading permits; and c) ADUs and residential projects
 2. Should include site plan requirements with specific detail expectations
- C. Site Plan Examples
 1. Visual examples of acceptable site plans and required elements (dimensions, scale, setbacks)
- D. Hybrid Submission Support
 1. Maintain both digital and in-person options
 2. Acknowledge limitations of older or less tech-savvy applicants
 3. Clear instructions for using electronic portals like CitizenServe

Project Name:	SRP 2.0 Imperial - Stakeholder Interview Summary Group 3: Imperial Valley Housing Authority (IVHA)
Date/Time/Location:	Wednesday, March 15, 2026, 11:00 am – 11:30 am, MS Teams
GHD Facilitators:	Brady M. Woods: Senior Project Manager

STAKEHOLDER INTERVIEW SUMMARY

– Group 3: Imperial Valley Housing Authority (IVHA)

Kirk Mann – Imperial Valley Housing Authority (Housing Programs / PBV oversight, ≈6 years)

Alex Celis – Imperial Valley Housing Authority, Contract Administrator (≈25 years)

Jesse Garcia – Imperial Valley Housing Authority, Maintenance Supervisor (≈27 years)

Yvonne Cordero – City of Imperial, Associate Planner

– Key Topics of Discussion

A. Housing Authority Engagement in Development

- The Housing Authority currently has limited direct involvement in hands-on project development within the City of Imperial.
- Recent participation has primarily been through project-based vouchers (PBVs) rather than entitlement, permitting, or construction management.
- The most recent City of Imperial project (Imperial Senior Housing) was developer-led, with the City playing a larger role in site preparation (including remediation), and the Housing Authority participating on the subsidy side.

B. City Process Impacts on Affordable Housing

- Participants indicated that City review processes were not perceived as a major barrier on recent projects.
- Delays experienced on past developments were largely attributed to:
 - Federal funding and subsidy layering issues (HUD, Section 202, PBVs).
 - Timing and coordination between multiple funding sources, rather than local entitlement or permit review.
- Overall, City responsiveness was viewed as reasonable, with no significant concerns raised regarding review timelines on recent Imperial projects.

C. Pre-Application Meetings and Ongoing Coordination

- While the Housing Authority has not participated recently in pre-application meetings within Imperial, past experience in other jurisdictions suggests:
 - Pre-application and recurring coordination meetings are generally valuable and informative.
 - Even when meetings occasionally exceed what is strictly necessary for voucher administration, they help maintain alignment across agencies and partners.
- Regular meetings during construction and close-out phases were viewed positively for maintaining clarity and expectations.

D. Process Clarity and Predictability

- The most consistent recommendation from participants was the need for clear, upfront process guidance, including:

STAKEHOLDER INTERVIEW SUMMARY

- A step-by-step outline of required approvals.
- Identification of which approvals must occur before others.
- Clear sequencing to avoid late-stage surprises.
- Participants emphasized that predictability and understanding the path forward is more valuable than simply shortening timelines.

E. Financing Considerations and City Awareness

- Participants noted that affordable housing projects often face complex and rigid funding schedules, particularly when layered financing is involved.
- Coordination issues more commonly arise between funding agencies, not between developers and the City.

F. Flexibility and Relief Mechanisms

- Participants expressed interest in clearer guidance around:
 - Whether minor waivers or administrative relief (e.g., small parking shortfalls) may be available.
 - How such requests differ from formal variances.
 - When and how applicants should pursue relief options.
- One potential opportunity identified:
 - Deferring impact fees or certain City fees until Certificate of Occupancy, as is done in some other jurisdictions, could improve project feasibility without compromising City oversight.

– General Reform Themes Identified by Participants

- A. Front-loaded clarity: Applicants benefit from knowing requirements, sequencing, and constraints early.
- B. Predictability over speed: Clear processes reduce late-stage complications.
- C. User-friendly guidance: Visual guides, flowcharts, and plain-language explanations support better applications.
- D. Alignment with financing realities: Awareness of funding timelines and constraints helps avoid misalignment between approvals and financing commitments.

– Potential Reform Tools Discussed

- A. Public-facing process guides that clearly show entitlement and permit pathways from concept through Certificate of Occupancy.
- B. Simple approval sequence diagrams showing prerequisites and dependencies.
- C. Clear explanations of administrative relief options versus discretionary approvals.
- D. Greater transparency around fee timing and potential deferral policies, where legally permissible.

Project Name:	SRP 2.0 Imperial - Stakeholder Interview Summary Group 4: Private Developers
Date/Time/Location:	Responses submitted via Stakeholder Interview Questionnaire 4/13/2026

STAKEHOLDER INTERVIEW SUMMARY

– Group 4: Private Developers

Daniel Dobron – CEO, Pacific West Development
Andrew Dixon – President/CFO, Pacific West Development

– Key Topics of Discussion

A. Overall Process Performance

- For new projects, early-stage entitlement and planning processes are perceived as slow-moving, with limited follow-up and insufficient urgency, increasing carrying costs and uncertainty.
- For active/ongoing projects, the building permit process functions relatively smoothly once projects are underway, particularly during fee payment and permit issuance.

B. Process Clarity & Communication

- Limited clarity regarding entitlement steps and expected timelines.
- Plan check durations frequently exceed stated or anticipated timeframes, with little proactive notification.
- Difficulty obtaining timely responses from City staff via email, phone, or text, contributing to avoidable project delays and added costs.

C. Timing & Predictability

- Review timelines are viewed as highly unpredictable, especially for new project entitlements and multi-department plan checks.
- Promised review periods are rarely met, reducing confidence in scheduling, financing coordination, and construction planning.
- Respondent emphasized that realistic timelines would be preferable to optimistic estimates that are not achieved.
- Most consistent stall points identified:
 - Entitlement processing
 - Plan check review cycles
 - Planning Commission and City Council approvals, particularly when review timelines shift without notice

D. Housing & Development Impacts

- Long and uncertain approval timelines noted as especially challenging for housing projects, where delays:
 - Increase financing and holding costs
 - Complicate coordination with lenders, investors, and contractors
 - Introduce project risk unrelated to project quality or compliance

STAKEHOLDER INTERVIEW SUMMARY

– **General Reform Themes Identified by Participants**

- A. Lack of response creates as much delay as formal review.
- B. Knowing how long processes will actually take reduces risk.
- C. Early-stage process clarity would significantly improve applicant confidence and project planning.

– **Potential Reform Tools Suggested**

- A. City could contract with third-party plan check consultants to clear review schedules.
- B. Improve consistency and accuracy in plan check comments.
- C. More reliable response expectations from City staff.
- D. Clear points of contact during entitlement and review processes.
- E. Realistic entitlement and plan check durations.
- F. Full approval sequences for new projects.



***DRAFT* RESOLUTION PC2026-06**

A RESOLUTION OF THE IMPERIAL PLANNING COMMISSION RECOMMENDING CITY COUNCIL APPROVAL OF THE COMMUNITY DEVELOPMENT PERMIT STREAMLINING AND OPERATIONAL REPORT

WHEREAS, the Regional Early Action Planning Grant Program of 2021 (“REAP 2.0”) program was established by the California state legislature as part of the 2021 California Comeback Plan under AB 140 to confront the statewide housing affordability crisis by building and expanding on the success of the REAP 2019 program by integrating housing and climate goals and allowing for broader planning and implementation investments to facilitate housing supply, choice, and affordability; and

WHEREAS, REAP 2.0-funded activities are intended to accelerate infill development that facilitate housing supply, choice, and affordability; affirmatively further fair housing; and reduce vehicle miles traveled; and

WHEREAS, the City of Imperial Community Development Department was awarded a technical assistance grant through the 2021 REAP 2.0 Grant Program administered by the Southern California Association of Governments; and

WHEREAS, the Community Development Permit Streamlining and Operational Report and entitlement guides were formulated to meet the REAP 2.0 program objectives; and

WHEREAS, the grant supports the development of a regulatory framework to enhance the accessibility of permitting review processes, align permitting practices with State housing law, and improve process clarity by implementing entitlement visual guides; and

WHEREAS, upon analyzing the information presented, the Planning Commission recommends approval of the City of Imperial Community Development Permit Streamlining Report and its findings to the City Council.

PASSED, ADOPTED, AND APPROVED by the Imperial Planning Commission, this 13th day of May, 2026.

Planning Commission

ATTEST:

City Clerk