

Date: October 7, 2025

To: Inyo County Planning Department

From: Precision Civil Engineering, Inc.

Subject: Infill Residential Capacity Study: Identifying Opportunities and Constraints for Development Standards Modifications in Big Pine, Independence, and Lone Pine

1. Introduction

The purpose of this memorandum is to summarize Precision Civil Engineering’s (PCE) review, evaluation, and findings for the Inyo County Zoning and General Plan Design Standards Review and Update to Promote Residential Infill project. The memorandum is organized into the following sections with key takeaways at the end of each section, followed by recommendations.

- A. Development and Design Standards Review
 - 1. Residential Development Standards
 - 2. Additional Dwelling Unit (ADU)/Second Dwelling Unit
- B. Vacant and Underutilized Lands Inventory
 - 1. Big Pine
 - 2. Independence
 - 3. Lone Pine
- C. Infill Residential Capacity Study
 - 1. Residential Development
 - 2. ADU/Second Unit Development
- D. Recommendations

2. Discussion

The purpose and findings of each task are described on the following pages.

A. Development and Design Standards Review

The purpose of the Development and Design Standards Review is to set a baseline of existing standards applicable to residential development and ADU/second unit development. Results are used to inform the identification of requirements that could be inhibiting more infill or ADU/second unit development. The following analysis were performed and are described in greater detail in this section below:

- 1. Review Current Standards for Residential Development.
- 2. Conduct a Comparison Analysis with “Case Study” Communities.
- 3. Review Current Standards for ADU/Second Unit Development.
- 4. Identify Existing Development Characteristics for ADU/Second Unit Development.

1. Residential Development Standards

PCE reviewed the existing density, intensity, and development standards applicable to residential development including, but not limited to, setbacks, lot sizes, parking requirements, density, height, etc. The outcome of that review is summarized as follows.

a. Residential Uses Permitted by Zoning District

Residential uses permitted per zoning district, including residential and commercial zoning districts, are summarized in **Table A-1**. As shown, single-family units (attached, detached) are principally permitted in all residential zoning districts and commercial zoning districts when certain occupancy requirements are met, and with a conditional use permit in the central business zoning district. Duplexes are principally permitted in the R-2, R-3, and CB zoning districts and conditionally permitted in the commercial zoning districts. Multi-family units (3+ units) are principally permitted in the R-3 and CB zoning districts and conditionally permitted in the commercial zoning districts.

Table A-1: Residential Uses Permitted by Zoning District

Residential Use	Zoning Districts								
	Residential Zoning Districts			Commercial Zoning Districts					Central Business Zoning Districts
	R-1	R-2	R-3	C-1	C-2	C-3	C-4	C-5	CB
Single-Family (1 unit)	P	P	P	P ²	P ²	P ²	P ²	P ³	C ¹
Duplex (2 units)	NP	P	P	C	C	C	C	C	P
Multi-Family (3+ units)	NP	NP	P	C	C	C	C	C	P
ADU	P	P	P	P	P	P	P	P	P

Legend:
P = Permitted Use
C = Conditional Use Permit
NP = Not Permitted

Notes:
1 = A detached residential dwelling unit is conditionally permitted if it is for occupancy by the owner or lessee of the business premises on the same parcel, or by a caretaker or watchman
2 = A dwelling unit within a business building may be qualified as an accessory use if it is for occupancy by the owner or lessee of business premises therein, or by a caretaker or watchman, provided that a minimum fifty percent of the usable floor area is being utilized for the principal permitted use.
3 = Dwellings of persons regularly employed on the premises for commercial recreational activities. Mobile homes may be used for this purpose.

b. Residential Development Standards in Residential and Commercial Zoning Districts

Development standards for residential and commercial zoning districts are summarized in **Table A-2**. Because the project is focused on higher density, residential infill opportunities, the R-1, R-2, R-3 residential zoning districts and the C-1, C-2, C-3, C-4, C-5, and CB commercial zoning districts were selected for review.

Table A-2: Residential and Commercial Zoning District Development Standards

Development Standard	Residential Zoning Districts			Commercial Zoning Districts					Central Business Zoning District
	R-1	R-2	R-3	C-1	C-2	C-3	C-4	C-5	CB ⁷
Density (du/ac)	2.0 – 4.5 (RL) or 4.6 – 7.5 (RM)	7.6 – 15 (RMH)	7.6 – 15 (RMH) or 15.1-24.0 (RH)	7.6 – 24	7.6 – 24	7.6 – 24	7.6 – 24	1 du/2.5 ac or up to 24 du/ac with clustering	7.6 - 24
Lot Area (Min.)	Varies: 5,800 sf. 6,500 sf. 7,200 sf. 9,900 sf. 10,000 sf. 12,000 sf. 14,000 sf. 0.5 acres 0.75 acres 1 acre	Varies: 6,500 sf. 13,000 sf. 14,000 sf. 15,000 sf. 1 acre 2 acres 5 acres	Varies: 6,500 sf. 10,000 sf. 20,000 sf. 1 acre 2 acres 3 acres 5 acres 10 acres	Varies: 10,000 sf. 1 acre	Varies: 10,000 sf. 0.5 acres 1 acre 1.5 acres 2 acres 2.5 acres 5 acres 6 acres	7,500 sf.	Varies: 10,000 sf. 0.5 acres 1 acre 5 acres 6 acres	Varies: 5 acres 10 acres 60 acres	10,000 sf.
Lot Width (Min.)	50 ft.	50 ft.	75 ft.	75 ft.	75 ft.	60 ft.	50 ft.	350 ft.	50 ft.
Front Yard Setback (Min.)	25 ft.	25 ft.	15 ft. or 25 ft. ¹	0 ft. or 20 ft. ²	25 ft.	0 ft.	0 ft.	25 ft.	0 ft.
Side Yard Setback (Min.)	5 ft.	5 ft.	5 ft. per story	0 ft. or 20 ft. ⁵	0 ft.	0 ft. ³	0 ft. or 5 ft. ⁴	20 ft.	0 ft. ⁷
Rear Yard Setback (Min.)	20 ft.	20 ft.	15 ft.	0 ft. or 20 ft. ⁵	0 ft. or 20 ft. ⁵	0 ft.	0 ft. or 20 ft. ⁵	20 ft.	0 ft. ⁷
Height (Max.)	35 ft. (2.5 stories)	40 ft. (3 stories)	40 ft. (3 stories)	40 ft. (3 stories) or 20 ft. ⁶	40 ft. (3 stories) or 20 ft. ⁶	40 ft. (3 stories)	40 ft. (3 stories)	30 ft. (2.5 stories)	40 ft. (3 stories) ⁷

Parking (Min.)	2 sp per unit	2 sp per unit	2 sp per unit plus 1 guest parking space for each 4 units	1 sp for each 400 sf.	1 sp for each 300 sf.	1 sp for each 200 sf.	1 sp per unit	2 sp per unit	1 sp for each 400 sf.
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Notes:

1 = 25 ft. when abutting R-1 or R-2 unless adjacent property has nonconforming structure, then same as the adjacent developed property
 2 = 20 ft. when abutting a residential parcel
 3 = Except when abutting an R district, then shall not be less than requirement of abutting R zone
 4 = 5 ft. for each story if adjacent to R district
 5 = 20 ft. when abutting a residential parcel
 6 = 20 ft. when located within 50 ft. of an R district
 7 = Residential Adjacency Exceptions. Where a parcel abuts a residentially zoned parcel and no public right-of-way for a street or alleyway lies between the central business and residentially zoned parcels, the following standards apply to the lot line that is common to the central business and residentially zoned parcels:
 1. Rear Yard Setback: same as is required for residential parcel,
 2. Side Yard Setback: same as is required for residential parcel,
 3. Building Height: average of what is required for residential parcel and what is required of commercial parcel;

c. *Comparison Analysis with Case Study Communities*

A comparison analysis of development standards for residential uses was conducted with select case study communities. An overview of the selected case study communities, in addition to Inyo County, is summarized in **Table A-3**. Of the case study communities, Inyo County is the largest geographically and has the third largest population, but the lowest population density. These metrics indicate that Inyo County has a large and dispersed population.

Development standards by residential zoning district per case study community and Inyo County are summarized in **Table A-4**. Development standards generally cover low-density single family, low- to medium-density multi-family, and medium- to high-density multi-family residential uses. Overall, Inyo County permits smaller lot sizes than the case study communities but has greater front and rear yard setback requirements and lower maximum height requirements than the case study communities.

Table A-3: Overview of Case Study Communities

Information Category	Case Study Communities				
	Inyo County	Modoc County	Mono County	Lassen County	Plumas County
Location	East central portion of CA	Northeastern CA, bordering Nevada and Oregon	East central portion of CA	Northeastern CA on the Eastern slopes of the Sierra Nevada Mountain range	Northern CA where Sierra Nevada and Cascade Mountain ranges meet
County Seat	Independence	Alturas	Bridgeport	Susanville	Quincy
Population (2023)	18,527	8,500	13,066	28,861	19,131
Population Density	1.9/sq. mi	2.1/sq. mi	4.2/sq. mi	6.9/sq. mi	7.6/sq. mi
Area	10,227 mi ²	4,203 mi ²	3,132 mi ²	4,720 mi ²	2,613 mi ²

Table A-4: Comparison of Residential Development Standards

Residential Use	Development Standard	Case Study Communities				
		Inyo County	Modoc County	Mono County	Lassen County	Plumas County
Low-Density Single-Family Residential	Zoning District	One Family Residences (R-1)	Residential Low Density (RL)	SFR	Single-Family (R-1)	Single-Family (2-R, 3-R, 7-R)
	Density	2.0 – 4.5 (RL) or 4.6 – 7.5 (RM)	7 du/ac with public water/sewer or 1 du/3 ac without public water or sewer	1 du/lot	1 to 7.25 du/ac (max.)	2-7 du/ac
	Lot Area (Min.)	5,800 sf.	10,000 sf. (when water and sewer are available)	7,500 sf.	Not specified	2-R: 21,780 sf. 3-R: 14,519 sf. 7-R: 6,222 sf.
	Lot Coverage (Max.)	Not specified	60%	40%	35%	50%
	Front Yard (Min.)	25 ft.	20 ft.	20 ft.	15 ft. (when 4+ lots in block are improved)	20 ft.
	Side Yard (Min.)	5 ft.	5 ft. – 20 ft.	10 ft.	5 ft. (with design review)	5 ft. (per story)
	Rear Yard (Min.)	20 ft.	5 ft.	10 ft.	20 ft.	5 ft. (per story)
	Height (Max.)	35 ft. (2.5 stories)	50 ft.	35 ft. - 45 ft. (if side/rear yards increased 1 ft. for each ft. over 35 ft.)	35 ft. (with design review)	35 ft.

	Parking/Unit (Min.)	2 spaces	1 bedroom: 1 space 2+ bedrooms: 2 spaces	2 spaces	2 spaces	2 spaces
Low to Medium Density Multi-Family Residential	Zoning District	Multiple Residential (R-2)	N/A	MFR – L	Limited Multiple-Family (R-2)	Multiple Family (M-R)
	Density	7.6 – 15 (RMH)		11.6 du/ac	8 du/ac (min.)	21.8 du/ac (max.)
	Lot Area (Min.)	6,500 sf.		7,500 sf.	Not specified	6,000 sf.
	Lot Coverage (Max.)	Not specified		40%	35%	50%
	Front Yard (Min.)	25 ft.		20 ft. – 30 ft.	15 ft. (when 4+ lots in block are improved)	0 ft.
	Side Yard (Min.)	5 ft.		10 ft. – 30 ft.	5 ft. (with design review)	5 ft. (per story)
	Rear Yard (Min.)	20 ft.		10 ft. – 30 ft.	20 ft.	5 ft. (per story)
	Height (Max.)	40 ft. (3 stories)		35 ft. - 45 ft. (if side/rear yards increased 1 ft. for each ft. over 35 ft.)	35 ft. (with design review)	35 ft.
	Parking/Unit (Min.)	2 spaces		2 spaces, and 1 guest parking space for each 6 units	2 spaces	2 spaces
Medium to High Density Multi-Family	Zoning District	Multiple Residential (R-3)	Residential High (R-H)	MFR -M MFR - H	Multiple-Family (R-3)	N/A

Residential	Density	7.6 – 15 (RMH) or 15.1 – 24.0 (RH)	13 du/ac with public water/sewer or 1 du/3 ac without public water or sewer	15	8 du/ac (min.)
	Lot Area (Min.)	10,000 sf.	6,000 sf. (when water and sewer are available)	7,500 sf. or number of units X 2,904 sf. if 3+ units	Not specified
	Lot Coverage (Max.)	Not specified	60%	60%	60%
	Front Yard (Min.)	15 ft. or 25 ft. when abutting R-1 or R-2	20 ft.	20 ft. – 30 ft.	15 ft. (when 4+ lots in block are improved)
	Side Yard (Min.)	5 ft. (per story)	5 ft. – 20 ft.	10 ft. – 30 ft.	5 ft.
	Rear Yard (Min.)	15 ft.	5 ft.	10 ft. – 30 ft.	15 ft.
	Height (Max.)	40 ft. (3 stories)	50 ft. (2 stories)	35 ft. - 45 ft. (if side/rear yards increased 1 ft. for each ft. over 35 ft.)	45 ft.
	Parking/Unit (Min.)	2 spaces plus one guest parking for each 4 units	1 bedroom: 1 space 2+ bedrooms: 2 spaces	2 spaces, and 1 guest parking space for each 6 units	2 spaces

d. *Key Takeaways*

Key takeaways from the review of residential development standards and comparison analysis with case study communities are summarized below. Generally, while Inyo County’s zoning broadly allows for residential uses, the review indicates that specific development standards – including minimum lot size, setbacks, parking, and height requirements – could restrict infill and higher-density housing development.

Residential Inclusion in Commercial Zones

Residential uses are permitted in many commercial zone districts (C-1 through C-5, CB) including single-family, duplex, and multi-family. This indicates support for residential infill and mixed-use development within non-residential areas, which can help increase housing opportunities.

Limitations to Buildable Area and Density

Minimum lot size requirements vary significantly and are generally large, which can serve as a barrier to achieving maximum density or enabling the creation of smaller lots. In addition, the minimum setbacks in R-2 and R-2 zones (25 feet front, 20 feet rear) can significantly reduce the buildable area of parcels, making it challenging to maximize density or accommodate additional units including ADUs. While commercial zones generally have more flexibility (0 feet), adjacency to residential zones can trigger more restrictive requirements. In addition, higher parking minimums in residential zones may constrain site design, increase development costs, and limit the number of units that can physically fit on a parcel.

Inconsistent Approach to Density Constraints Compared to Case Study Communities

Compared to the case study communities, Inyo County generally permits smaller minimum lot sizes for low-density single-family residential development. However, Inyo County has greater minimum front and rear yard setbacks, lower maximum building height requirements, and higher minimum parking standards than the comparable communities. These standards can limit the overall buildable area and vertical density achievable on parcels, restricting infill and higher-density development.

2. ADU/Second Dwelling Unit Development Standards

a. *Overview of Current ADU Standards*

PCE conducted a review of the County’s existing ADU ordinance and of current State Law to produce a checklist of existing development and design standards applicable to ADUs in Inyo County. The County’s ADU regulations are contained in Section 18.78.340 – Accessory Dwelling Units of the Zoning Ordinance. To ensure compliance with State ADU law, the County permits ADUs in all residential and mixed-use zones and allows all ADU applications to be ministerially reviewed for conformance with the minimum allowable standards. Therefore, the County’s current standards for ADUs are consistent with the minimum allowable standards of State ADU Law. Current State ADU law is summarized in **Table A-5**.

Beyond Section 18.78.340, PCE reviewed other sections of the Zoning Ordinance that could apply to ADUs. Based on this review, PCE identified potential modifications including, 1) clearly designating ADUs as permitted uses within relevant residential (e.g., R-1, R-2, etc.) and mixed-use (e.g., CB) zoning districts under “permitted uses,” 2) including a statement that ADUs are a distinct housing type and are not classified as

general “accessory buildings,” and 3) amending the definition of ADUs to include Manufactured Homes and Tiny Homes as permissible ADU types.

a. Existing Development Characteristics for ADU/Second Unit Development

PCE conducted a review of Annual Progress Reports and available building permit records to identify characteristics of ADU/second unit development that has been proposed and/or built in the County within the past five (5) years. The County has received 30 ADU permit applications between 2019 and 2023, with ADUs ranging in size from approximately 300 square feet to 750 square feet.

b. Key Takeaways

Key takeaways from the review of ADU/second dwelling unit development standards are summarized below. Generally, the County’s ADU development standards align with State ADU Law, but there is the potential for some modifications to further encourage ADU development.

Compliance with State Law

Inyo County’s ADU ordinance is consistent with current State ADU Law, allowing ADUs in all residential and mixed-use zones, and ensuring a streamlined, ministerial review process.

Potential for Multiple ADUs Per Lot

State ADU Law, as adopted by the County, enables significant ADU capacity. For single-family lots, this means up to three (3) ADUs are allowed (one (1) detached, one (1) attached, and one Junior ADU). For multi-family, this means at least one (1) internal conversion ADU, plus up to eight (8) detached ADUs (not exceeding the number of existing units) or up to 25% of existing units converted to ADUs are allowed.

Flexible Development Standards for ADUs

State ADU Law provides specific, more flexible development standards for ADUs compared to primary dwellings, such as reduced setbacks (minimum four (4) foot side and rear yard), higher size limits (up to 1,000 square feet for detached ADUs and 1,200 square feet or 50% of the primary dwelling, whichever is less for attached ADUs), and parking exemptions.

Opportunities for Zoning Ordinance Modifications

Beyond current compliance, the review identified specific modifications to further encourage ADU development including clearer permitted use designations, distinct housing type classification, and expanded definitions to include Manufactured Homes and Tiny Homes, which broadens the range of permissible ADU types.

Demonstrated ADU Interest

Local building permit records show that residents are interested in ADUs, with 30 ADU applications received between 2019 and 2023.

Table A-5: Minimum Requirements for Development Standards by ADU Type per State Law

Development Standard	Minimum Requirements Per State ADU Law			
	Detached ADU		Attached ADU	
	New Construction	Converted Structure	New Construction	Converted Space
Number (Max.)	<p>Single-Family Lots: 1 Detached ADU (plus 1 attached and 1 Junior ADU)</p> <p>Multi-Family Lots: Up to 8 Detached ADUs, not to exceed number of existing units on the lot - or - Up to 2 Detached ADUs on lots with a proposed multi-family dwelling</p>		<p>Single-Family Lots: 1 Attached ADU - and - 1 Junior ADU</p> <p>Multi-Family Lots: At least 1 interior ADU conversion - and - Up to 25% of the total number of units on lots with existing multi-family dwellings</p>	
Size (Max.)	<p>1 Bedroom: Up to 850 sq. ft.</p> <p>1+ Bedrooms: Up to 1,000 sq. ft.</p>	<p>Same size of the structure being converted but may be increased up to an additional 150 sq. ft. to accommodate entering and exiting the ADU</p>	<p>Junior ADUs: Up to 500 sq. ft.</p> <p>All Other ADUs: 50% of the existing primary dwelling, or 850 sq. ft. for a 1-bedroom unit or 1,000 sq. ft. for unit with more than 1-bedroom, whichever is greater</p>	<p>Junior ADUs: Up to 500 sq. ft.</p> <p>All Other ADUs: 50% of the floor area of the existing primary dwelling, or 1,200 square feet, whichever is less</p>
Setbacks (Min.)	<p>Front Yard: As established in the zone district, provided the setback does not preclude the construction of an up to 800 sq. ft. ADU with 4 ft. side and 4 ft. rear yard setbacks</p> <p>Side Yard: 4 ft.</p> <p>Rear Yard: 4 ft.</p>	<p>If constructed in the same location and to the same dimensions as the existing structure, then the ADU shall maintain the same setbacks as the existing structure or minimum setbacks of 4 ft. from the side and rear yards, whichever is less</p>	<p>Front Yard: As established in the zone district</p> <p>Side Yard: 4 ft.</p> <p>Rear Yard: 4 ft.</p>	<p>If constructed in the same location and to the same dimensions as the existing structure, then the ADU shall maintain the same setbacks as the existing structure or minimum setbacks of 4 ft. from the side and rear yards, whichever is less</p>

<p>Height (Max.)</p>	<p>16 ft. on a lot with a proposed or existing single-family or multi-family dwelling</p> <p>18 ft. on a lot with an existing or proposed multi-family, multi-story dwelling</p>	<p>Same height as the space being converted</p>	<p>The height of the existing single-family or multi-family dwelling, or 25 ft., whichever is less</p>	<p>Same height as the space being converted</p>
<p>Parking (Min.)</p>	<p>1 space per unit or bedroom, whichever is less unless exceptions are met</p>		<p>Junior ADUs: None required</p> <p>All Other ADUs: 1 space per unit or bedroom, whichever is less unless exceptions are met</p>	

B. Vacant and Underutilized Lands Inventory

The purpose of the Vacant and Underutilized Lands Inventory is to establish a database that compiles information about parcels of land in Big Pine, Independence, and Lone Pine that are either undeveloped (i.e., vacant) or not being used to their full potential (i.e., underutilized), which could potentially be developed or redeveloped for residential uses. For the purposes of this inventory, these parcels are labeled as “infill.”

1. Methodology

a. Review and Update Countywide Vacant Lands Inventory

PCE reviewed and as needed, updated the Countywide Vacant Lands Inventory for properties with all the following characteristics, in Big Pine, Independence, and Lone Pine:

- Zoned to allow residential uses (including commercial zones).
- Classified vacant according to County assessor’s data as of 2025.
- Located within a local fire protection district.
- Located within or adjacent to a water and/or sanitary sewer service district.
- Designated as private or County.
- Located near public transportation and other services.

b. Create Underutilized Lands Inventory

PCE then created an inventory of underutilized properties in Big Pine, Independence, and Lone Pine, where “underutilized land” means a parcel of land that is zoned to allow residential uses but is not currently built to the intensity allowed by the underlying land use or zoning designation. Determining underutilized lands consisted of the following steps.

- Identify Non-Vacant Infill Parcels that are:
 - Zoned to allow residential uses (including commercial zones).
 - Designated with a residential or non-residential property class in the County’s GIS database as of 2025.
 - Located within a local fire protection district.
 - Located within or adjacent to a water and/or sanitary sewer service district.
 - Designated as private or County.
 - Located near public transportation and other services.
- Verify (or approximate) existing development characteristics (e.g., density, FAR, height) of the identified Non-Vacant Infill Parcels through aerial imagery, photos or information provided by the County, real estate data (e.g., Redfin, Zillow, etc.), or other methods.

2. Vacant and Underutilized Lands Inventory

c. Big Pine Community

There are 21 infill parcels in Big Pine. These parcels are listed in **Table B-1** and shown in **Figure B-1** and **Figure B-2**. Four (4) out of 21 parcels are currently developed with a single-family residence; the remaining parcels are vacant and undeveloped. The four (4) developed parcels are included in this inventory because

the underlying zone district (R-3-1.0) allows for additional units. As shown, parcel size ranges from approximately 0.16 acres (6,969 square feet) to approximately 1.13 acres (49,222 square feet). The parcels are primarily planned and zoned for residential use (15 out of 21 parcels), with six (6) parcels planned and zoned for central business or commercial uses.

d. Independence Community

There are 15 infill parcels in Independence. These parcels are listed in **Table B-2** and shown in **Figure B-3** and **Figure B-4**. Fourteen (14) out of 15 parcels are currently undeveloped; the remaining parcel is currently used as a trailer connect. As shown, parcel size ranges from approximately 0.15 acres (6,500 square feet) to approximately 0.34 acres (15,000 square feet). Eight (8) parcels are planned and zoned for central business or commercial uses and seven (7) parcels are planned and zoned for residential uses.

e. Lone Pine Community

There are 18 infill parcels in Lone Pine. These parcels are listed in **Table B-3** and shown in **Figure B-5** and **Figure B-6**. Three (3) out of 18 parcels are currently developed with a single-family residence; the remaining parcels are vacant and undeveloped. The three (3) developed parcels are included in this inventory as underutilized parcels because the parcels can either be subdivided further, or an additional unit is allowed by the site's zoning. As shown, parcel size ranges from approximately 0.11 acres (5,000 square feet) to approximately 2.5 acres (108,900 square feet). The parcels are primarily zoned for residential uses (14 out of 18 parcels), with four (4) parcels planned and zoned for central business or commercial uses.

3. Key Takeaways

a. Significant Housing Opportunities

The inventory establishes a database of 54 infill parcels across Big Pine (21 parcels), Independence (15 parcels), and Lone Pine (18 parcels) that have the potential for residential development.

b. Vacant Parcels Available for Immediate Development

A significant majority of the identified infill sites are currently vacant and undeveloped (17 in Big Pine, 14 in Independence, 15 in Lone Pine). These parcels represent immediate opportunities for development.

c. Underutilized Land with Additional Capacity

Beyond vacant lots, the inventory also includes some developed but underutilized parcels (4 in Big Pine, 1 in Independence, and 3 in Lone Pine). These parcels, primarily single-family residences on multi-family zoned land, provides potential for increased housing density through additional units or subdivisions.

d. Diverse Parcel Sizes and Zoning

The infill parcels range in size, from approximately 0.11 acres (5,000 square feet) to 2.5 acres (108,900 square feet), and are distributed across both residential and commercial zone districts in all three communities, which provides flexibility for diverse housing types.

Table B-1: Vacant and Underutilized Lands Inventory – Big Pine

APN	Land Use Designation	Zoning	Existing Use	Acreage
003-155-14	Central Business District (CBD)	Central Business (CBD)	Vacant	0.17
003-210-10	Residential Medium-High Density (RMH)	Multiple Residential (R3-1.0)	Single-Family Residence	1.13
003-210-30	Central Business District (CBD)	Central Business (CBD)	Vacant	0.41
004-010-09	Residential Low Density (RL)	One Family Residences (R1-10,000)	Vacant	0.22
004-020-23	Residential Medium Density (RM)	Multiple Residential (R3-1.0)	Single-Family Residence	0.85
004-031-17	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.25
004-031-18	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.25
004-031-31	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.65
004-032-09	Residential Medium-High Density (RMH)	Multiple Residential (R3-1.0)	Single-Family Residence	1.00
004-032-13	Central Business District (CBD)	Central Business (CBD)	Vacant	0.36
004-032-17	Residential Medium-High Density (RMH)	Multiple Residential (R3-1.0)	Single-Family Residence	0.89
004-040-04	Central Business District (CBD)	Central Business (CBD)	Vacant	0.80
004-040-22	Central Business District (CBD)	Central Business (CBD)	Vacant	0.35
004-070-42	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.17
004-090-05	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.60
004-101-09	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	1.00
004-152-18	Central Business District (CBD)	Central Business (CBD)	Vacant	0.25
018-290-35	Residential Medium Density (RM)	One Family Residences (R1-7,200)	Vacant	0.22
018-290-54	Residential Medium Density (RM)	One Family Residences (R1-7,200)	Vacant	0.22
018-320-04	Residential Medium Density (RM)	PUD-ORD-326	Vacant	0.16
018-340-09	Residential Medium Density (RM)	PUD-ORD-326	Vacant	0.27

Table B-2: Vacant and Underutilized Lands Inventory – Independence

APN	Land Use Designation	Zoning	Existing Use	Acreage
002-052-05	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-086-10	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-095-13	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-096-21	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-104-10	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-104-11	Central Business District (CBD)	Central Business (CBD)	Vacant	0.15
002-096-19	Central Business District (CBD)	Central Business (CBD)	Vacant	0.30
002-025-11	Central Business District (CBD)	Central Business (CBD)	Vacant	0.34
002-034-07	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.15
002-051-04	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.15
002-095-09	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.15
002-036-10	Residential Medium-High Density (RMH)	One Family Residences (R1-5,800)	Vacant	0.17
002-055-12	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.30
002-036-01	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Trailer Connect	0.22
002-035-11	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.30

Table B-3: Vacant and Underutilized Lands Inventory – Lone Pine

APN	Land Use Designation	Zoning	Existing Use	Acreage
005-106-04	Central Business District (CBD)	Central Business (CBD)	Vacant	0.11
005-106-08	Central Business District (CBD)	Central Business (CBD)	Vacant	0.11
005-066-01	Central Business District (CBD)	Central Business (CBD)	Vacant	0.23
005-146-07	Central Business District (CBD)	Central Business (CBD)	Vacant	0.42
005-091-08	Residential Low Density (RL)	One Family Residences (R1-10,000)	Vacant	0.11
005-091-07	Residential Low Density (RL)	One Family Residences (R1-10,000)	Vacant	0.12
005-071-09	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.16
005-071-10	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.17
005-109-48	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.20
005-113-32	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Vacant	0.25
005-074-29	Residential Medium Density (RM)	One Family Residences (R1-5,800)	Single-Family Residence	0.67
005-010-24	Residential Medium Density (RM)	One Family Residences (R1-7,200)	Vacant	0.15
026-044-01	Residential Medium Density (RM)	One Family Residences (R1-7,200)	Vacant	1.25
026-044-06	Residential Medium Density (RM)	One Family Residences (R1-7,200)	Single-Family Residence	2.50
005-112-28	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Single-Family Residence	0.17
005-072-03	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.17
005-073-29	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.17
005-112-15	Residential Medium-High Density (RMH)	Multiple Residential (R2-6,500)	Vacant	0.17

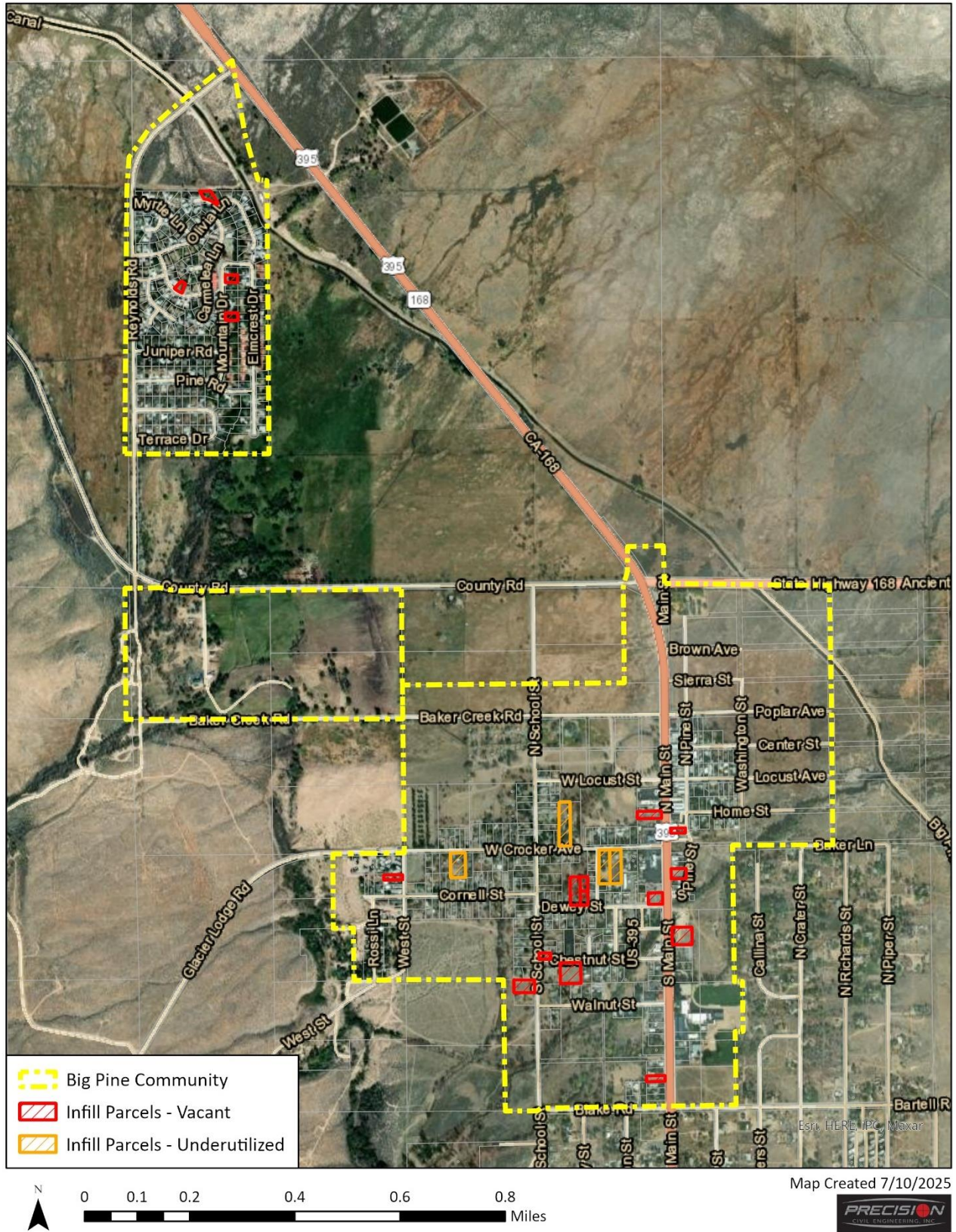


Figure B-1 Vacant and Underutilized Inventory (Aerial) – Big Pine

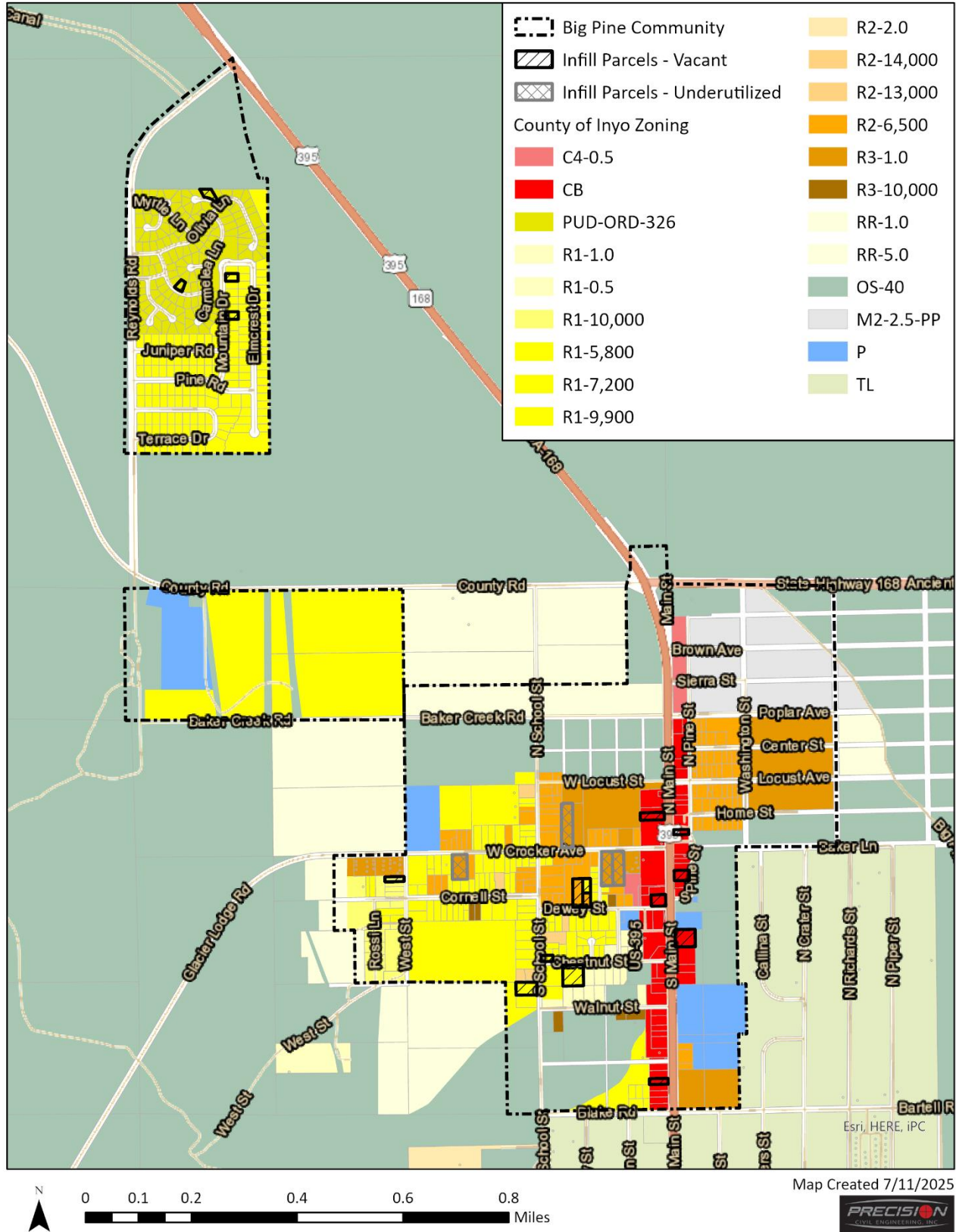


Figure B-2 Vacant and Underutilized Inventory (Zoning) – Big Pine

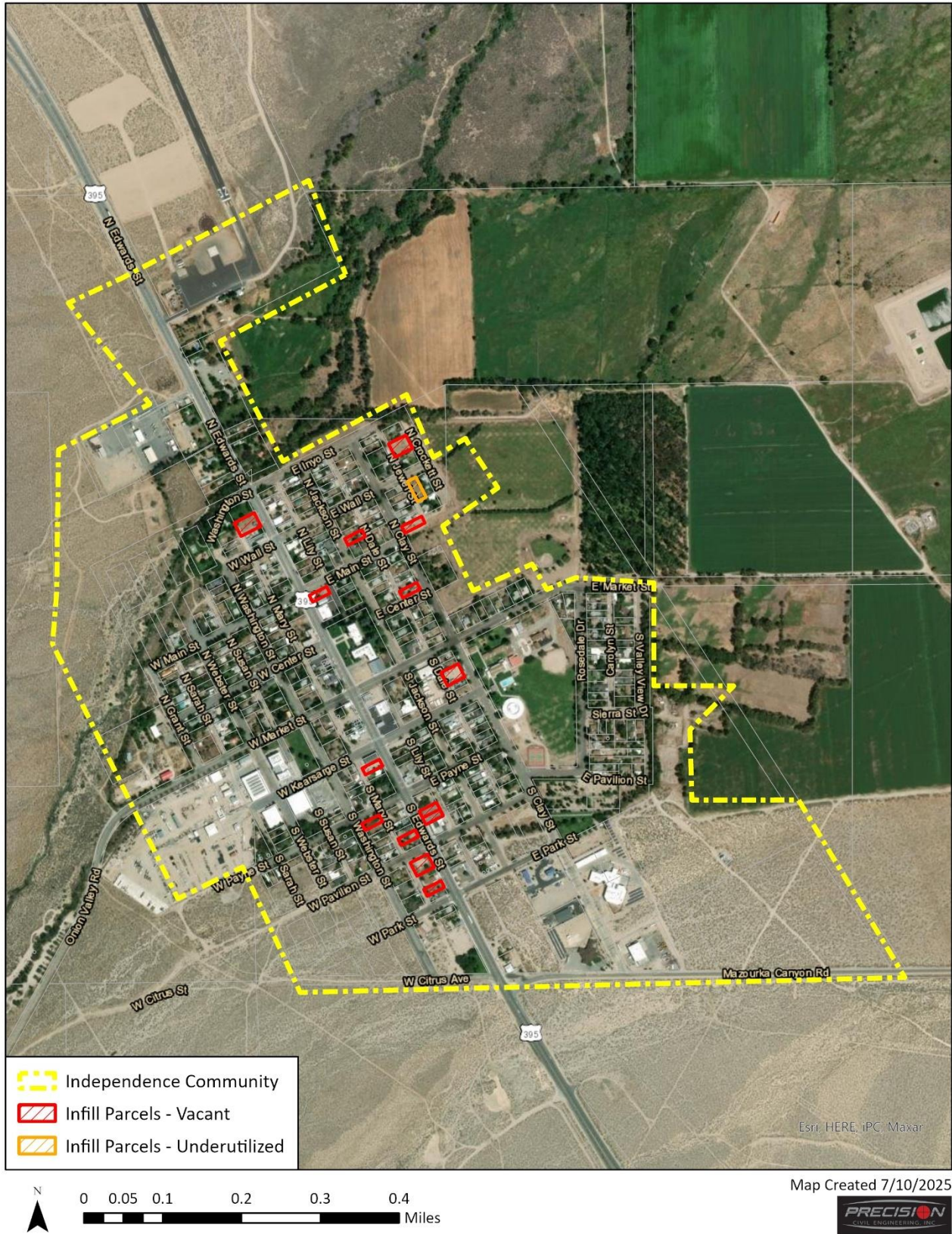


Figure B-3 Vacant and Underutilized Lands Inventory (Aerial) – Independence

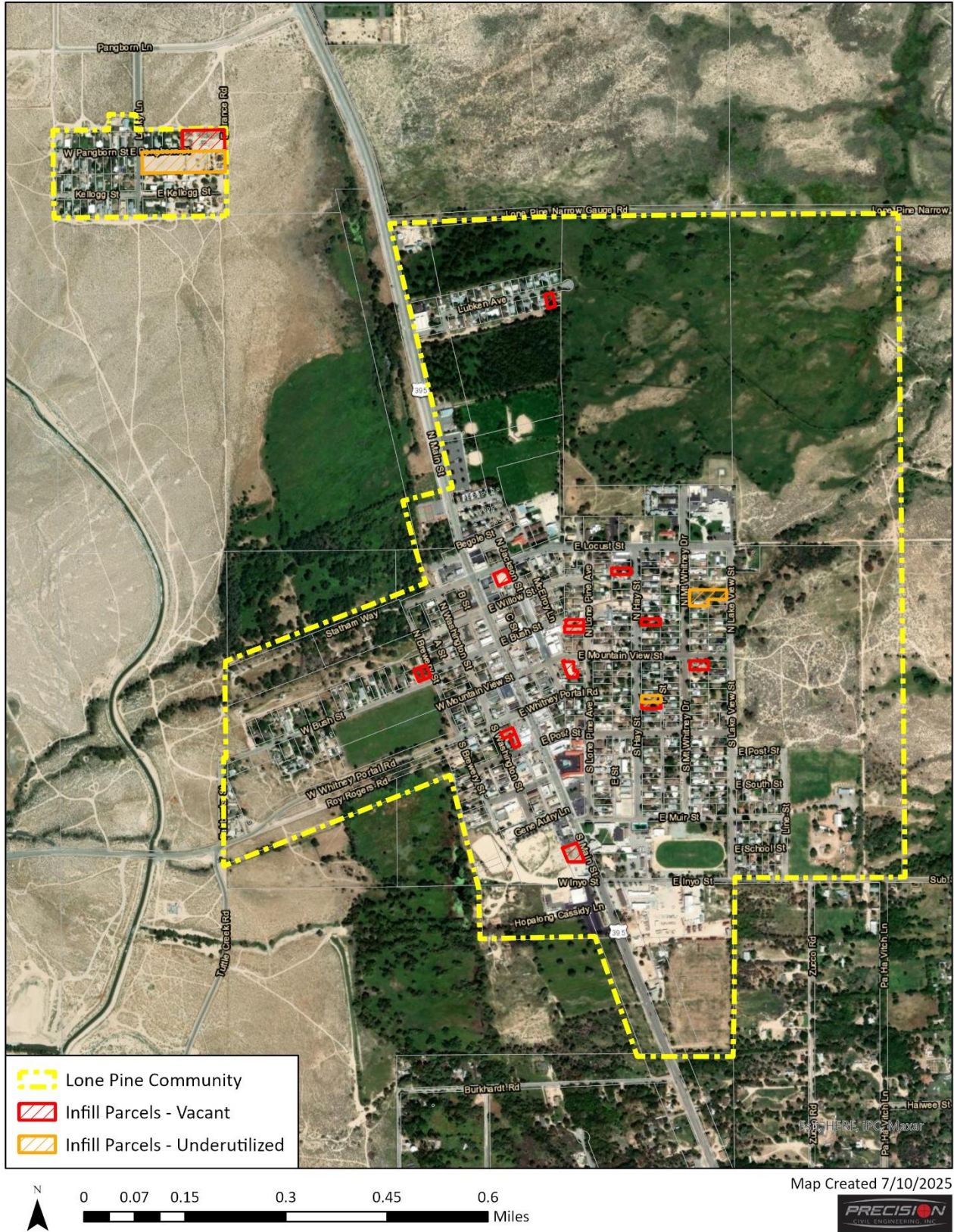


Figure B-5 Vacant and Underutilized Lands Inventory (Aerial) – Lone Pine

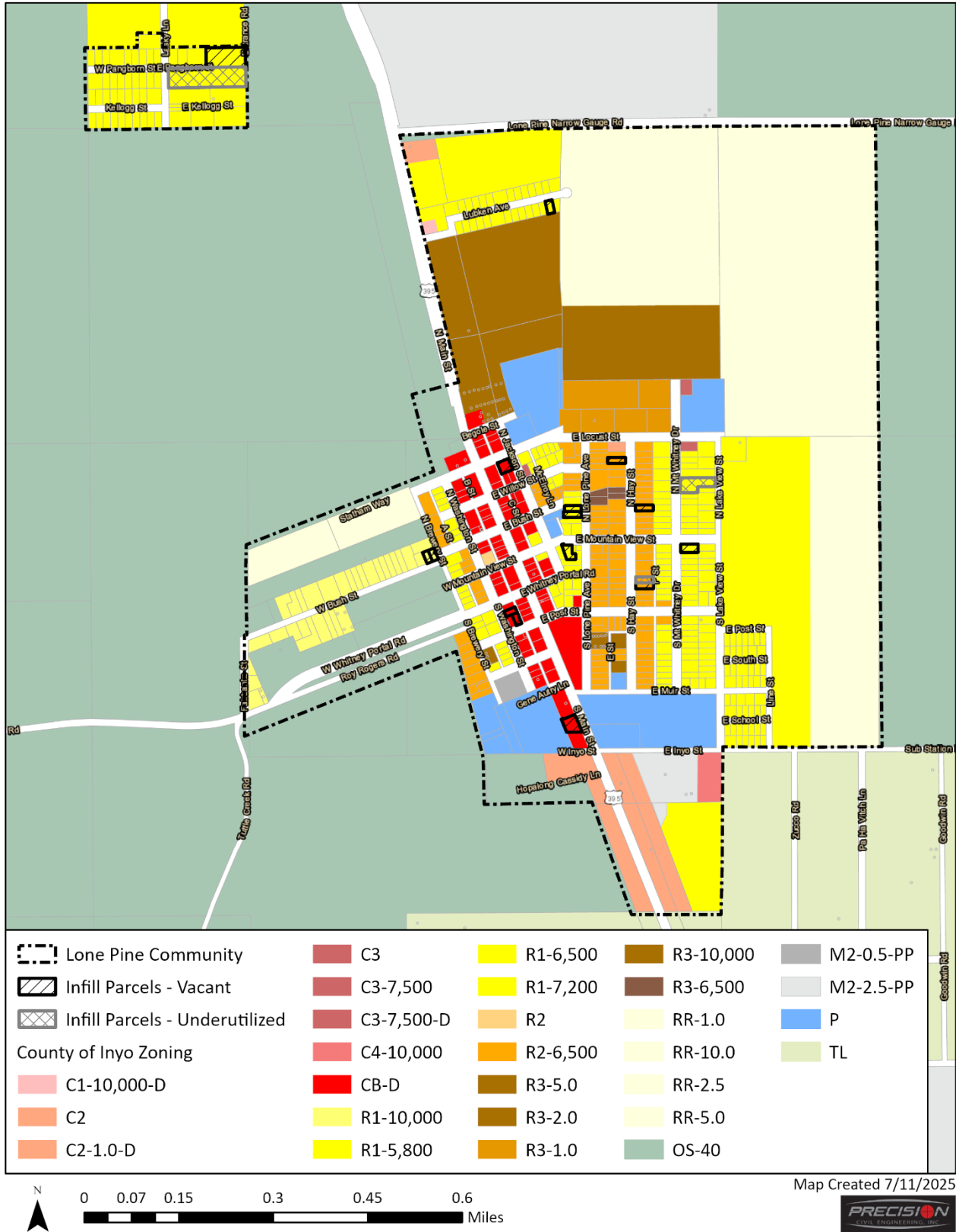


Figure B-6 Vacant and Underutilized Inventory (Zoning) – Lone Pine

C. Infill Residential Capacity Study

The purpose of the Infill Residential Capacity Study is to identify recommendations for modifying development and design standards that could create more opportunities for infill residential development including ADUs and second units.

1. Parcel Screening and Initial Feasibility

This section details the initial assessment of the infill parcels, focusing on whether identified infill parcels can accommodate residential development at their maximum allowable density under current regulations. By conducting a 'test fit' analysis, this analysis establishes a baseline understanding of the development capacity of these parcels before exploring modifications to existing standards.

a. Test Fit Analysis

Utilizing the Vacant and Underutilized Lands Inventories, a “test fit” was performed on each infill parcel to analyze whether each parcel can be developed at the maximum density (e.g., General Plan maximum dwelling units per acre by land use designation) under the existing development standards. Only seven (7) parcels out of the total analyzed were identified as not capable of reaching maximum density due to use limits and minimum lot size. The test fit analysis is shown in **Table C-1**.

Table C-1: Fit Test Analysis

APN	GP	Zoning	Lot Width, Depth		Lot Size (Sf.)	Permitted Density (Minium, Maximum)		Required Setbacks (Front, Side, Rear)			Permitted Uses	Max. Units Per GP	Required Parking	Buildable Area	Can parcel be developed with max. density?
002-036-01	RMH	R2-6,500	65	150	9,750	7.6	15.0	25	5	20	Single-Family, Duplex	3	6	5,775	N [1]
002-036-10	RMH	R1-5,800	50	150	7,489	7.6	15.0	25	5	20	Single-Family	2	4	4,200	N [2]
004-031-18	RMH	R2-6,500	76.5	142.33	10,903	7.6	15.0	25	5	20	Single-Family, Duplex	3	6	6,472	N [3]
004-031-31	RMH	R2-6,500	100	284.67	28,360	7.6	15.0	25	5	20	Single-Family, Duplex	9	18	21,570	N [4]
018-340-09	RM	PUD-ORD-326	146 / 113	144	11,761	4.6	7.5	25	5	20	Single-Family	2	4	-	N [5]
026-044-01	RM	R1-7,200	165	330	54,450	4.6	7.5	25	5	20	Single-Family	9	18	44,175	N [6]
026-044-06	RM	R1-7,200	165	648.1	108,900	4.6	7.5	25	5	20	Single-Family	18	36	93,481	N [7]
002-025-11	CBD	CB	100	150	15,000	7.6	24.0	0	0	0	Multiple-Family	8	18	15,000	Y
002-034-07	RM	R1-5,800	50	130	6,500	4.6	7.5	25	5	20	Single-Family	1	2	3,400	Y
002-035-11	RMH	R2-6,500	100	130	13,000	7.6	15.0	25	5	20	Single-Family, Duplex	4	8	7,650	Y
002-051-04	RM	R1-5,800	50	130	6,500	4.6	7.5	25	5	20	Single-Family	1	2	3,400	Y
002-052-05	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
002-055-12	RM	R1-5,800	100	130	13,000	4.6	7.5	25	5	20	Single-Family	2	4	7,650	Y

002-086-10	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
002-095-09	RM	R1-5,800	50	130	6,500	4.6	7.5	25	5	20	Single-Family	1	2	3,400	Y
002-095-13	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
002-096-19	CBD	CB	100	130	13,000	7.6	24.0	0	0	0	Multiple-Family	7	16	13,000	Y
002-096-21	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
002-104-10	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
002-104-11	CBD	CB	50	130	6,500	7.6	24.0	0	0	0	Multiple-Family	3	7	6,500	Y
003-155-14	CBD	CB	50.18	149.28	7,527	7.6	24.0	0	0	0	Multiple-Family	4	9	7,491	Y
003-210-10	RMH	R3-1.0	111.87	440	49,223	7.6	15.0	15	5	15	Single-Family, Duplex, Multiple Family	16	36	41,767	Y
003-210-30	CBD	CB	75	240	18,009	7.6	24.0	0	0	20	Multiple-Family	9	20	16,500	Y
004-010-09	RL	R1-10,000	50	189.95	9,498	2.0	4.5	25	5	20	Single-Family	1	2	5,798	Y
004-020-23	RM	R3-1.0	149	247.6	36,892	4.6	7.5	15	5	15	Single-Family, Duplex, Multiple Family	6	14	30,246	Y
004-031-17	RM	R1-5,800	76.5	142.34	10,904	4.6	7.5	25	5	20	Single-Family	1	2	6,473	Y
004-032-09	RMH	R3-1.0	128.5	340	43,690	7.6	15.0	15	5	15	Single-Family, Duplex, Multiple Family	15	34	36,735	Y

004-032-13	CBD	CB	115.5	143	15,756	7.6	24.0	0	0	0	Multiple-Family	8	18	16,517	Y
004-032-17	RMH	R3-1.0	113.5	340	38,590	7.6	15.0	15	5	15	Single-Family, Duplex, Multiple Family	13	29	32,085	Y
004-040-04	CBD	CB	175	200	35,000	7.6	24.0	0	0	0	Multiple-Family	19	43	35,000	Y
004-040-22	CBD	CB	102	150	15,351	7.6	24.0	0	0	0	Multiple-Family	8	18	15,300	Y
004-070-42	RM	R1-5,800	62.13	115.9	7,201	4.6	7.5	25	5	20	Single-Family	1	2	3,696	Y
004-090-05	RM	R1-5,800	125.12	208.8	26,125	4.6	7.5	25	5	20	Single-Family	4	8	18,857	Y
004-101-09	RM	R1-5,800	208.8	208.86	43,609	4.6	7.5	25	5	20	Single-Family	7	14	32,575	Y
004-152-18	CBD	CB	58.6	188	10,595	7.6	24.0	0	0	20	Multiple-Family	5	11	9,845	Y
005-010-24	RM	R1-7,200	60	111	6,690	4.6	7.5	25	5	20	Single-Family	1	2	3,300	Y
005-066-01	CBD	CB-D	100	100	10,000	7.6	24.0	0	0	0	Multiple-Family	5	11	10,000	Y
005-071-09	RM	R1-5,800	50	140	7,000	4.6	7.5	25	5	20	Single-Family	1	2	3,800	Y
005-071-10	RM	R1-5,800	50	149.72	7,486	4.6	7.5	25	5	20	Single-Family	1	2	4,189	Y
005-072-03	RMH	R2-6,500	50	150	7,500	7.6	15.0	25	5	20	Single-Family, Duplex	2	4	4,200	Y
005-073-29	RMH	R2-6,500	50	150	7,500	7.6	15.0	25	5	20	Single-Family, Duplex	2	4	4,200	Y
005-074-29	RM	R1-5,800	75 / 125	290	29,037	4.6	7.5	25	5	20	Single-Family	4	8	20,925	Y
005-091-07	RL	R1-10,000	53.23	100	5,323	2.0	4.5	25	5	20	Single-Family	1	2	2,378	Y

005-091-08	RL	R1-10,000	50	100	5,000	2.0	4.5	25	5	20	Single-Family	1	2	2,200	Y
005-106-04	CBD	CB-D	50	100	5,000	7.6	24.0	0	0	0	Multiple-Family	2	5	5,000	Y
005-106-08	CBD	CB-D	50	100	5,000	7.6	24.0	0	0	0	Multiple-Family	2	5	5,000	Y
005-109-48	RM	R1-5,800	87 / 75	121.5	8,838	4.6	7.5	25	5	20	Single-Family	1	2	4,467.25	Y
005-112-15	RMH	R2-6,500	50	150	7,500	7.6	15.0	25	5	20	Single-Family, Duplex	2	4	4,200	Y
005-112-28	RMH	R2-6,500	50	150	7,500	7.6	15.0	25	5	20	Single-Family, Duplex	2	4	4,200	Y
005-113-32	RM	R1-5,800	71.46	145	10,361	4.6	7.5	25	5	20	Single-Family	1	2	6,146	Y
005-146-07	CBD	CB-D	118.6 / 161	120	18,209	7.6	24.0	0	0	0	Multiple-Family	10	23	18,209.00	Y
018-290-35	RM	R1-7,200	76	126.84	9,662	4.6	7.5	25	5	20	Single-Family	1	2	5,401	Y
018-290-54	RM	R1-7,200	76	124	9,442	4.6	7.5	25	5	20	Single-Family	1	2	5,214	Y
018-320-04	RM	PUD-ORD-326	90 / 50	100	6,970	4.6	7.5	25	5	20	Single-Family	1	2	3,300	Y

Notes:

[1] The parcel cannot be subdivided due to minimum lot size requirements. As such, only 2 units (duplex) can be developed.

[2] Zoning limits to 1 unit per lot; parcel cannot be subdivided due to minimum lot size requirements.

[3] The parcel cannot be subdivided due to minimum lot size requirements. As such, only 2 units (duplex) can be developed.

[4] Parcel can be subdivided into 4 lots with 2 units per lot, but would not meet maximum density.

[5] Parcel would need to be subdivided but would not meet minimum lot size. This parcel is an irregular shaped lot – unable to calculate buildable area.

[6] Minimum lot size of 7,200 sf. would only result in 7 lots (1 unit per lot) after subdivision.

[7] Minimum lot size of 7,200 sf. would only result in 15 lots (1 unit per lot) after subdivision.

2. Quantifying Residential and ADU Capability for Infill Parcels

Building on the initial assessment, this section provides a more detailed quantification of the potential residential and ADU capacity within the identified infill parcels. By applying current General Plan densities, zoning allowances, and State ADU Law, this analysis provides data on the number of potential housing units and highlights any discrepancies between planned and permitted densities.

a. Residential Capacity Analysis

The potential residential capacity for the infill parcels was calculated using the residential density outlined in the General Plan (i.e., maximum dwelling units per acre) and the number of permitted units within the underlying zoning district. The results indicate a maximum capacity of 247 units under General Plan maximum densities and a maximum capacity of 195 units under zoning.¹ This 52-unit difference highlights a mismatch between the General Plan's intended density and the zoning use restrictions in all three communities, which could limit a property owner's ability to develop the site to the intended density and make the most efficient use of their property. The residential capacity analysis is shown in **Table C-2**.

b. ADU Capacity of Infill Parcels

The potential ADU capacity for the infill parcels was calculated based on ADUs allowed under current State ADU Law. Specifically, one (1) junior ADU, one (1) attached ADU, and one (1) detached ADU per single-family lot and up to eight (8) detached ADUs (not to exceed the number of existing units, if any) per multi-family lot. The results indicate the maximum ADU capacity of the 54 infill parcels under current State ADU Law is 287 units. This number does not account for site specifics that could restrict ADU development, such as site layout, constraints, and compliance with applicable requirements (e.g., fire code, building code, etc.). The ADU capacity analysis is shown in **Table C-3**.

c. Adaptive Reuse of Non-Residential Buildings

Another potential strategy for infill development is adaptive reuse, or the conversion of existing buildings into residential units. This strategy leverages existing infrastructure and building stock. The community, through workshops and surveys, has shown general interest in encouraging the redevelopment and reuse of existing buildings along or near Main Street (Highway 395) for housing. Of note, most buildings in these areas are in the CB zone district, which allows multi-family residential development and ADUs.

The potential residential capacity for CB zoned parcels with existing non-residential structures, except for certain uses like gas stations, mini-storage, County facilities, etc., was calculated using the residential density outlined in the General Plan (i.e., maximum dwelling units per acre). The results indicate a maximum capacity of 176 units in Big Pine, 117 units in Independence, and 227 units in Lone Pine. This number does not account for whether these buildings are vacant, nor does it consider site specifics that could restrict residential development, such as site layout, constraints, and compliance with applicable requirements (e.g., fire code, building code, etc.). The adaptive reuse analysis is shown in **Table C-4**.

¹ Numbers represent capacity. The actual number of units that could be built is contingent upon specific site constraints and adherence to additional development standards.

Table C-2: Residential Capacity Analysis

APN	Community	Lot Size (Acre)	General Plan Land Use Designation	Permitted Density (Minimum, Maximum)		Zoning	GP Max. Units	Zoning Max. Units	Difference
002-025-11	Independence	0.34	Central Business District (CBD)	7.60	24.0	CBD	8	8	-
002-034-07	Independence	0.15	Residential Medium Density (RM)	4.60	7.5	One Family Residences (R1-5,800)	1	1	-
002-035-11	Independence	0.30	Residential Medium-High Density (RMH)	7.60	15.0	Multiple Residential (R2-6,500)	4	2	(2)
002-036-01	Independence	0.22	Residential Medium-High Density (RMH)	7.60	15.0	Multiple Residential (R2-6,500)	3	2	(1)
002-036-10	Independence	0.17	Residential Medium-High Density (RMH)	7.60	15.0	One Family Residences (R1-5,800)	2	1	(1)
002-051-04	Independence	0.15	Residential Medium Density (RM)	4.60	7.5	One Family Residences (R1-5,800)	1	1	-
002-052-05	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
002-055-12	Independence	0.30	Residential Medium Density (RM)	4.60	7.5	One Family Residences (R1-5,800)	2	1	(1)
002-086-10	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
002-095-09	Independence	0.15	Residential Medium Density (RM)	4.60	7.5	One Family Residences (R1-5,800)	1	1	-
002-095-13	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
002-096-19	Independence	0.30	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	7	7	-
002-096-21	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
002-104-10	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
002-104-11	Independence	0.15	Central Business District (CBD)	7.60	24.0	Central Business (CBD)	3	3	-
003-155-14	Big Pine	0.17	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	4	4	-
003-210-10	Big Pine	1.13	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R3-1.0)	16	16	-

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003-210-30	Big Pine	0.41	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	9	9	-
004-010-09	Big Pine	0.22	Residential Low Density (RL)	2.00	4.50	One Family Residences (R1-10,000)	1	1	-
004-020-23	Big Pine	0.85	Residential Medium Density (RM)	4.60	7.50	Multiple Residential (R3-1.0)	6	6	-
004-031-17	Big Pine	0.25	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	2	1	(1)
004-031-18	Big Pine	0.25	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	3	2	(1)
004-031-31	Big Pine	0.65	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	9	2	(7)
004-032-09	Big Pine	1.00	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R3-1.0)	15	15	-
004-032-13	Big Pine	0.36	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	8	8	-
004-032-17	Big Pine	0.89	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R3-1.0)	13	13	-
004-040-04	Big Pine	0.80	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	19	19	-
004-040-22	Big Pine	0.35	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	8	8	-
004-070-42	Big Pine	0.17	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	1	1	-
004-090-05	Big Pine	0.60	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	4	1	(3)
004-101-09	Big Pine	1.00	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	7	1	(6)
004-152-18	Big Pine	0.24	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	5	5	-
005-010-24	Lone Pine	0.15	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-7,200)	1	1	-
005-066-01	Lone Pine	0.23	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	5	5	-
005-071-09	Lone Pine	0.16	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	1	1	-
005-071-10	Lone Pine	0.17	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	1	1	-

005-072-03	Lone Pine	0.17	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	2	2	-
005-073-29	Lone Pine	0.17	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	2	2	-
005-074-29	Lone Pine	0.67	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	4	1	(3)
005-091-07	Lone Pine	0.12	Residential Low Density (RL)	2.00	4.50	One Family Residences (R1-10,000)	1	1	-
005-091-08	Lone Pine	0.11	Residential Low Density (RL)	2.00	4.50	One Family Residences (R1-10,000)	1	1	-
005-106-04	Lone Pine	0.11	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	2	2	-
005-106-08	Lone Pine	0.11	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	2	2	-
005-109-48	Lone Pine	0.20	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	1	1	-
005-112-15	Lone Pine	0.17	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	2	2	-
005-112-28	Lone Pine	0.17	Residential Medium-High Density (RMH)	7.60	15.00	Multiple Residential (R2-6,500)	2	2	-
005-113-32	Lone Pine	0.24	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-5,800)	1	1	-
005-146-07	Lone Pine	0.42	Central Business District (CBD)	7.60	24.00	Central Business (CBD)	10	10	-
018-290-35	Big Pine	0.22	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-7,200)	1	1	-
018-290-54	Big Pine	0.22	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-7,200)	1	1	-
018-320-04	Big Pine	0.16	Residential Medium Density (RM)	4.60	7.50	PUD-ORD-326	1	1	-
018-340-09	Big Pine	0.27	Residential Medium Density (RM)	4.60	7.50	PUD-ORD-326	2	1	(1)
026-044-01	Lone Pine	1.25	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-7,200)	9	1	(8)
026-044-06	Lone Pine	2.50	Residential Medium Density (RM)	4.60	7.50	One Family Residences (R1-7,200)	18	1	(17)
Total Units							247	195	(52)

Table C-3: ADU Capacity Analysis

APN	Community	Lot Size (Acre)	General Plan Land Use Designation	General Plan Max. Density	GP Max. Units	Max. ADUs Per State Law	Analysis
002-025-11	Independence	0.34	Central Business District (CBD)	24.0	8	8	[1]
002-034-07	Independence	0.15	Residential Medium Density (RM)	7.5	1	3	[2]
002-035-11	Independence	0.30	Residential Medium-High Density (RMH)	15.0	4	8	[1]
002-036-01	Independence	0.22	Residential Medium-High Density (RMH)	15.0	3	8	[1]
002-036-10	Independence	0.17	Residential Medium-High Density (RMH)	15.0	2	3	[2]
002-051-04	Independence	0.15	Residential Medium Density (RM)	7.5	1	3	[2]
002-052-05	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
002-055-12	Independence	0.30	Residential Medium Density (RM)	7.5	2	3	[2]
002-086-10	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
002-095-09	Independence	0.15	Residential Medium Density (RM)	7.5	1	3	[2]
002-095-13	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
002-096-19	Independence	0.30	Central Business District (CBD)	24.0	7	8	[1]
002-096-21	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
002-104-10	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
002-104-11	Independence	0.15	Central Business District (CBD)	24.0	3	8	[1]
003-155-14	Big Pine	0.17	Central Business District (CBD)	24.00	4	8	[1]
003-210-10	Big Pine	1.13	Residential Medium-High Density (RMH)	15.00	16	3	[3]
003-210-30	Big Pine	0.41	Central Business District (CBD)	24.00	9	8	[1]
004-010-09	Big Pine	0.22	Residential Low Density (RL)	4.50	1	3	[2]
004-020-23	Big Pine	0.85	Residential Medium Density (RM)	7.50	6	3	[3]
004-031-17	Big Pine	0.25	Residential Medium Density (RM)	7.50	2	3	[2]
004-031-18	Big Pine	0.25	Residential Medium-High Density (RMH)	15.00	3	8	[1]
004-031-31	Big Pine	0.65	Residential Medium-High Density (RMH)	15.00	9	8	[1]
004-032-09	Big Pine	1.00	Residential Medium-High Density (RMH)	15.00	15	3	[3]
004-032-13	Big Pine	0.36	Central Business District (CBD)	24.00	8	8	[1]
004-032-17	Big Pine	0.89	Residential Medium-High Density (RMH)	15.00	13	3	[3]
004-040-04	Big Pine	0.80	Central Business District (CBD)	24.00	19	8	[1]
004-040-22	Big Pine	0.35	Central Business District (CBD)	24.00	8	8	[1]
004-070-42	Big Pine	0.17	Residential Medium Density (RM)	7.50	1	3	[2]

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004-090-05	Big Pine	0.60	Residential Medium Density (RM)	7.50	4	3	[2]
004-101-09	Big Pine	1.00	Residential Medium Density (RM)	7.50	7	3	[2]
004-152-18	Big Pine	0.24	Central Business District (CBD)	24.00	5	8	[1]
005-010-24	Lone Pine	0.15	Residential Medium Density (RM)	7.50	1	3	[2]
005-066-01	Lone Pine	0.23	Central Business District (CBD)	24.00	5	8	[1]
005-071-09	Lone Pine	0.16	Residential Medium Density (RM)	7.50	1	3	[2]
005-071-10	Lone Pine	0.17	Residential Medium Density (RM)	7.50	1	3	[2]
005-072-03	Lone Pine	0.17	Residential Medium-High Density (RMH)	15.00	2	8	[1]
005-073-29	Lone Pine	0.17	Residential Medium-High Density (RMH)	15.00	2	8	[1]
005-074-29	Lone Pine	0.67	Residential Medium Density (RM)	7.50	4	3	[3]
005-091-07	Lone Pine	0.12	Residential Low Density (RL)	4.50	1	3	[2]
005-091-08	Lone Pine	0.11	Residential Low Density (RL)	4.50	1	3	[2]
005-106-04	Lone Pine	0.11	Central Business District (CBD)	24.00	2	8	[1]
005-106-08	Lone Pine	0.11	Central Business District (CBD)	24.00	2	8	[1]
005-109-48	Lone Pine	0.20	Residential Medium Density (RM)	7.50	1	3	[2]
005-112-15	Lone Pine	0.17	Residential Medium-High Density (RMH)	15.00	2	8	[1]
005-112-28	Lone Pine	0.17	Residential Medium-High Density (RMH)	15.00	2	3	[3]
005-113-32	Lone Pine	0.24	Residential Medium Density (RM)	7.50	1	3	[2]
005-146-07	Lone Pine	0.42	Central Business District (CBD)	24.00	10	8	[1]
018-290-35	Big Pine	0.22	Residential Medium Density (RM)	7.50	1	3	[2]
018-290-54	Big Pine	0.22	Residential Medium Density (RM)	7.50	1	3	[2]
018-320-04	Big Pine	0.16	Residential Medium Density (RM)	7.50	1	3	[2]
018-340-09	Big Pine	0.27	Residential Medium Density (RM)	7.50	2	3	[2]
026-044-01	Lone Pine	1.25	Residential Medium Density (RM)	7.50	9	3	[2]
026-044-06	Lone Pine	2.50	Residential Medium Density (RM)	7.50	18	3	[3]
Total Units					247	287	-

Notes:

[1] MFR properties can have up to 8 detached ADUs, provided the number does not exceed the number of existing units.

[2] SFR properties can have up to 3 ADUs including 1 JADU, 1 attached ADU, and 1 detached ADU.

[3] Site developed with existing SFR; SFR properties can have up to 3 ADUs including 1 JADU, 1 attached ADU, and 1 detached ADU.

Table C-4: Adaptive Reuse Analysis

APN	General Plan Designation	Existing Use (2025)	Address	Lot Size (Acre)	GP Max. Density	Max. Units
Big Pine Community						
004-040-03	CBD	Motel 14 Units & MGR	370 S Main St	0.80	24	19
004-040-30	CBD	Motel 16 Units	102 N Main St	0.44	24	10
003-210-41	CBD	Motel 18 Units	101 N Main St	1.42	24	34
004-112-17	CBD	Motel 9 Units & MGR	511 S Main St	0.36	24	8
003-152-08	CBD	270 Restaurant	442 N Main St	0.33	24	7
003-152-02	CBD	Store & Residence	320 N Main St	0.33	24	7
003-210-26	CBD	Store & Residence	161 N Main St	0.28	24	6
004-040-01	CBD	Store & Residence	430 S Main St	0.55	24	13
004-040-02	CBD	Store & Residence	400 South Main St	0.37	24	8
004-040-24	CBD	Store & Residence	130 S Main St	0.24	24	5
004-102-16	CBD	Church	461 S Main St	0.67	24	15
004-040-29	CBD	Commercial Services	190 S Main St	0.31	24	7
003-155-10	CBD	Multi Commercial & Offices	180 N Main St	0.17	24	4
003-155-15	CBD	Multi Commercial & Offices	100 N Main St	0.19	24	4
004-040-19	CBD	Multi Commercial & Offices	126 S Main St	0.19	24	4
003-152-03	CBD	Restaurant	310 North Main St	0.34	24	8
004-032-26	CBD	Restaurant	181 S Main St	0.30	24	7
004-040-20	CBD	Retail Store	120 S Main St	0.17	24	3
004-102-18	CBD	Retail Store	411 S Main St	0.33	24	7
Total Units						176
Independence Community						
002-031-20	CBD	Office & Residence	426 N Edwards St	0.30	24	7
002-025-03	CBD	Motel 8 Units & MGR	405 N Edwards St	0.15	24	3
002-026-01	CBD	Commercial Services	349 N Edwards St	0.30	24	7
002-026-08	CBD	Church	331 N Edwards St	0.36	24	8
002-095-01	CBD	Store & Residence	305 South Edwards St	0.30	24	7
002-031-13	CBD	Warehouse	418 N Edwards St	0.15	24	3
002-032-16	CBD	Church	356 N Edwards St	0.45	24	10

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002-045-12	CBD	Hotel	211 N Edwards St	0.60	24	14
002-046-11	CBD	Restaurant	127 N Edwards St	0.52	24	12
002-046-12	CBD	Motel 10 Units	157 N Edwards St	0.32	24	7
002-052-04	CBD	Meeting Room	246 N Edwards St	0.15	24	3
002-085-02	CBD	Food Store	149 S Edwards St	0.33	24	7
002-085-09	CBD	Restaurant	135 S Edwards St	0.08	24	2
002-102-06	CBD	Commercial Services	250 S Edwards St	0.45	24	10
002-106-03	CBD	Motel	440 S Edwards St	0.45	24	10
002-113-07	CBD	Motel 8 Units & MGR	515 S Edwards St	0.32	24	7
Total Units						117
Lone Pine Community						
005-108-10	CBD	Store & Residence	114 S Main St	0.11	24.00	2
005-032-03	CBD	Bank	400 N Main St	0.23	24.00	5
005-032-08	CBD	Retail Store	430 N Main St	0.11	24.00	2
005-061-10	CBD; RM	Multi Commercial	403 N Main St	0.57	24.00	13
005-064-08	CBD	Motel 28 Units & MGR	305 N Main St	0.57	24.00	13
005-065-01	CBD	211 Retail Store	243 N Main St	0.09	24.00	2
005-065-09	CBD	Motel 16 Units	138 W Willow St	0.34	24.00	8
005-065-11	CBD	Multi Commercial & Offices	201 N Main St	0.18	24.00	4
005-065-12	CBD	Multi Commercial	223 N Main St	0.14	24.00	3
005-065-13	CBD	Retail Store	217 N Main St	0.05	24.00	1
005-067-02	CBD	Office Building	221 North Jackson St	0.15	24.00	3
005-067-06	CBD	Restaurant	226 N Main St	0.05	24.00	1
005-067-10	CBD	Commercial Services	202 N Main St	0.19	24.00	4
005-104-01	CBD	Retail Store	141 N Main St	0.11	24.00	2
005-104-03	CBD	Commercial Services	107 N Main St	0.11	24.00	2
005-104-04	CBD	Retail Store	103 N Main St	0.06	24.00	1
005-104-09	CBD	Multi Commercial	123 N Main St	0.11	24.00	2
005-104-10	CBD	Restaurant	119 N Main St	0.06	24.00	1
005-105-03	CBD	Multi Commercial	131 S Main St	0.11	24.00	2
005-105-09	CBD	Office & Residence	131 W Whitney Portal Rd	0.23	24.00	5

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005-105-16	CBD	Food Store	119 S Main St	0.34	24.00	8
005-106-02	CBD	Restaurant	227 S Main St	0.11	24.00	2
005-106-03	CBD	Multi Commercial	235 S Main St	0.11	24.00	2
005-107-01	CBD	Multi Commercial	127 N Jackson St	0.23	24.00	5
005-107-03	CBD	Multi Commercial	104 N Main St	0.17	24.00	4
005-107-04	CBD	Multi Commercial	124 N Main St	0.29	24.00	6
005-108-04	CBD	Retail Store	138 S Main St	0.08	24.00	1
005-108-07	CBD	Multi Commercial	104 S Main St	0.11	24.00	2
005-109-22	CBD	Motel 9 Units	215 E Post St	0.17	24.00	4
005-109-40	CBD	Restaurant	206 S Main St	0.11	24.00	2
005-109-41	CBD	Restaurant	212 S Main St	0.07	24.00	1
005-109-44	CBD	Hotel	238 S Main St	0.23	24.00	5
005-141-12	CBD	Hotel	310 S Main St	2.52	24.00	60
005-142-01	CBD	Restaurant	301 S Main St	0.23	24.00	5
005-142-02	CBD	Multi Commercial	325 S Main St	0.23	24.00	5
005-142-05	CBD	Office Building	126 W Post St	0.02	24.00	0
005-144-03	CBD	Motel 6 Units	402 S Washington St	0.11	24.00	2
005-144-06	CBD	Motel	425 S Main St	0.23	24.00	5
005-146-04	CBD	Motel 17 Units & MGR	633 South Main St	0.40	24.00	9
005-146-06	CBD	Restaurant	601 S Main St	0.65	24.00	15
005-061-10	CBD; RM	Commercial	403 N Main St	0.34	24.00	8
Total Units						227

3. Analyzing Development Constraints and Potential for Flexibility

This section analyzes specific regulatory and physical constraints that may impede infill residential development. By analyzing subdivision potential, buildable area, and modeling the impact of reduced setbacks, this section identifies recommendations for modifying development standards to increase housing capacity in the three (3) communities.

a. Subdivision Analysis

The potential for the infill parcels to be subdivided into smaller parcels was calculated based on the existing square footage of each parcel and the minimum lot size requirements of the underlying zoning districts. The results show 10 infill parcels could be potentially subdivided into 46 lots; the actual number of lots would be dependent on lot configurations and compliance with applicable regulations. This potential for subdivisions represents an opportunity to create new parcels that could accommodate additional housing as allowed within the underlying General Plan land use designation and zoning district for each individual parcel. The subdivision analysis is shown in **Table C-5**.

Of the parcels identified as unsuitable for further subdivision, the majority are limited by minimum lot size requirements. These parcels currently adhere to the 50-foot minimum lot width requirements, with depths ranging from 100 to 240 feet. Further subdivision of these parcels would be possible if minimum lot size requirements were reduced and if the site had adequate access. However, an across-the-board reduction in minimum lot size is not recommended as the specific reductions needed to enable subdivisions vary significantly by zone district and parcel (e.g., 3,250 square feet for R-1-5,800, 3,750 square feet for R-2-6,500, and 4,721 square feet for R-1-7,200). These reductions would result in significantly smaller parcels that may or may not have adequate site access (e.g., public street frontage or access easements).

Beyond lot size requirements, the analysis also shows that a limited number of infill parcels, specifically larger lots zoned R3-1.0 ranging from 38,590 square feet to 49,223 square feet, could currently be constrained by minimum width requirements. A reduction of the minimum width to 50 feet could increase the subdivision potential for these parcels, allowing the creation of an additional two (2) to three (3) lots per site depending on site access. Enabling subdivisions could encourage development through reduced per-unit land costs or phased development, or through broader market appeal to builders who may not have the capacity to carry out larger development.

Table C-5: Subdivision Analysis

APN	Min. Lot Size Requirement (Sf.)	Min. Width Requirement (Ft.)	Lot Size (Sf.) (Est.)	Lot Width (Ft.) (Est.)	Lot Depth (Ft.) (Est.)	Is Subdivision Possible?	Reason	# of Lots
002-025-11	10,000	50	15,000	100	150	N	Min. Lot Size	1
002-034-07	5,800	50	6,500	50	130	N	Min. Lot Size	1
002-035-11	6,500	50	13,000	100	130	Y	-	2
002-036-01	6,500	50	9,750	65	150	N	Min. Lot Size	1
002-036-10	5,800	50	7,489	50	150	N	Min. Lot Size	1
002-051-04	5,800	50	6,500	50	130	N	Min. Lot Size	1
002-052-05	10,000	50	6,500	50	130	N	Min. Lot Size	1
002-055-12	5,800	50	13,000	100	130	Y	-	2
002-086-10	10,000	50	6,500	50	130	N	Min. Lot Size	1
002-095-09	5,800	50	6,500	50	130	N	Min. Lot Size	1
002-095-13	10,000	50	6,500	50	130	N	Min. Lot Size	1
002-096-19	10,000	50	13,000	100	130	N	Min. Lot Size	1
002-096-21	10,000	50	6,500	50	130	N	Min. Lot Size	1
002-104-10	10,000	50	6,500	50	130	N	Min. Lot Size	1
002-104-11	10,000	50	6,500	50	130	N	Min. Lot Size	1
003-155-14	10,000	50	7,527	50	149	N	Min. Lot Size	1
003-210-10	10,000	75	49,223	112	440	N	Min. Lot Width	1
003-210-30	10,000	50	18,009	75	240	N	Min. Lot Size	1
004-010-09	10,000	50	9,498	50	190	N	Min. Lot Size	1
004-020-23	10,000	75	36,892	149	248	Y	-	2
004-031-17	5,800	50	10,904	77	142	N	Min. Lot Size	1
004-031-18	6,500	50	10,903	77	142	N	Min. Lot Size	1
004-031-31	6,500	50	28,360	100	285	Y	-	2
004-032-09	10,000	75	43,690	129	340	N	Min. Lot Width	1
004-032-13	10,000	50	15,756	116	143	N	Min. Lot Size	1
004-032-17	10,000	75	38,590	114	340	N	Min. Lot Width	3
004-040-04	10,000	50	35,000	175	200	Y	-	3
004-040-22	10,000	50	15,351	102	150	N	Min. Lot Size	1
004-070-42	5,800	50	7,201	62	116	N	Min. Lot Size	1

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004-090-05	5,800	50	26,125	125	209	Y	-	4
004-101-09	5,800	50	43,609	209	209	Y	-	7
004-152-18	10,000	50	10,595	59	188	N	Min. Lot Size	1
005-010-24	7,200	50	6,690	60	111	N	Min. Lot Size	1
005-066-01	10,000	50	10,000	100	100	N	Min. Lot Size	1
005-071-09	5,800	50	7,000	50	140	N	Min. Lot Size	1
005-071-10	5,800	50	7,486	50	150	N	Min. Lot Size	1
005-072-03	6,500	50	7,500	50	150	N	Min. Lot Size	1
005-073-29	6,500	50	7,500	50	150	N	Min. Lot Size	1
005-074-29	5,800	50	29,037	75/125	290	Y	-	5
005-091-07	10,000	50	5,323	53	100	N	Min. Lot Size	1
005-091-08	10,000	50	5,000	50	100	N	Min. Lot Size	1
005-106-04	10,000	50	5,000	50	100	N	Min. Lot Size	1
005-106-08	10,000	50	5,000	50	100	N	Min. Lot Size	1
005-109-48	5,800	50	8,838	87/75	122	N	Min. Lot Size	1
005-112-15	6,500	50	7,500	50	150	N	Min. Lot Size	1
005-112-28	6,500	50	7,500	50	150	N	Min. Lot Size	1
005-113-32	5,800	50	10,361	71	145	N	Min. Lot Size	1
005-146-07	10,000	50	18,209	118.6/161	120	N	Min. Lot Size	1
018-290-35	7,200	50	9,662	76	127	N	Min. Lot Size	1
018-290-54	7,200	50	9,442	76	124	N	Min. Lot Size	1
018-320-04	-	-	6,970	-	-	N	Min. Lot Size	1
018-340-09	-	-	11,761	-	-	N	Min. Lot Size	1
026-044-01	7,200	50	54,450	165	330	Y	-	7
026-044-06	7,200	50	108,900	165	648	Y	-	14
Total Number of Lots								94

b. Buildable Area Analysis

The buildable area for the infill parcels was determined by analyzing lot size, dimensions, and required setbacks per the Zoning Ordinance for each zoning district. Buildable areas generally vary by zoning district:

- **R-1:** buildable area ranges from 44% for 5,000+ square foot lots to 87% for 100,000+ square foot lots.
- **R-2:** buildable area ranges from 56% for 7,500+ square foot lots to 76% for 28,000+ square foot lots.
- **R-3:** buildable area ranges from 78% for 36,000+ square foot lots to 83% for 49,000+ square foot lots.
- **CBD:** buildable area is maintained at 100% due to zero lot line setbacks, except for two lots adjacent to an R-1 zone district.

To understand how setbacks affect buildable area, three (3) scenarios involving reductions in front and rear yard setbacks (5, 10, and 15 feet) were modeled for residentially zoned parcels to evaluate potential increases in buildable area. The analysis for all scenarios are shown in **Table C-6**. These results are summarized as follows.

R-1 Zoned Lots:

- **Scenario 1 (5-foot reduction):** an average increase of 7% from current setback requirements with a new range of 52% to 89%.
- **Scenario 2 (10-foot reduction):** an average increase of 13% from current setback requirements with a new range of 60% to 90%.
- **Scenario 3 (15-foot reduction):** an average increase of 20% from current setback requirements with a new range of 68% to 92%.

R-2 Zoned Lots:

- **Scenario 1 (5-foot reduction):** an average increase of 6% from current setback requirements with a new range of 61% to 79%.
- **Scenario 2 (10-foot reduction):** an average increase of 12% from current setback requirements with a new range of 67% to 82%.
- **Scenario 3 (15-foot reduction):** an average increase of 18% from current setback requirements with a new range of 72% to 85%.

R-3 Zoned Lots:

- **Scenario 1 (5-foot reduction):** an average increase of 6% from current setback requirements with a new range of 82% to 85%.
- **Scenario 2 (10-foot reduction):** an average increase of 11% from current setback requirements with a new range of 86% to 87%.
- **Scenario 3 (15-foot reduction):** an average increase of 16% from current setback requirements with a new range of 87% to 88%.

c. Key Takeaways

Key takeaways from the capacity analysis are summarized below.

Significant Infill Potential Identified

This analysis identified 54 infill parcels across Big Pine, Independence, and Lone Pine with potential for future residential development, indicating a base for increasing housing supply within existing communities.

General Plan vs. Zoning Mismatch Limits Density

A notable discrepancy exists between the General Plan's intended residential density (maximum 247 units) and the more restrictive current zoning standards (maximum 195 units) for the identified infill parcels. This 52-unit difference highlights a regulatory barrier that could discourage property owners from developing sites to their full potential as envisioned by the General Plan, thereby limiting efficient land use.

State ADU Law Increases Unit Capacity for Infill Parcels

Under current State ADU Law, the 54 identified infill parcels alone have a maximum ADU capacity of 287 units. This number surpasses the capacity for primary units under existing zoning. This highlights ADUs as a potential primary mechanism for increasing housing supply within existing communities.

Adaptive Reuse for Non-Residential Buildings

The conversion of existing non-residential buildings into residential units, particularly in areas along Main Street (Highway 395) with CB zoning, offers an opportunity for infill development by leveraging existing infrastructure and building stock. There's a potential capacity of 176 units in Big Pine, 117 in Independence, and 227 in Lone from such conversions, although dependent on site specifics.

Subdivision Potential Increases Housing Opportunities

Ten (10) of the infill parcels have the potential to be subdivided into an additional 46 lots. This represents an opportunity to create new, developable parcels that could increase housing stock, assuming appropriate lot configurations and regulatory compliance. Current minimum lot size and width requirements were identified as potential constraints preventing further subdivision of most parcels. Reducing lot size minimums, combined with ensuring adequate access, could increase subdivision potential, but across-the-board reductions are not recommended. Reducing the minimum width of R3-1.0 could increase housing capacity and make multi-family development more feasible.

Buildable Area is Constrained by Setbacks, but Modifiable

Current development standards, particularly setbacks, limit the buildable area on residential lots (e.g., R-1 lots range from 44-87% buildable, R-2 from 56-76%, R-3 from 78-83%). Modifying front and rear yard setbacks offers a way to increase buildable area. A 15-foot setback reduction (Scenario 3) could lead to average buildable area increases of 20% for R-1 lots, 18% for R-2 lots, and 16% for R-3 lots. This demonstrates the impact of adjusting standards on development capacity.

Table C-6: Buildable Area Analysis by Scenario

APN	Current Setbacks		Setback Scenario 1 (5 Ft. Reduction)			Setback Scenario 2 (10 Ft. Reduction)			Setback Scenario 3 (15 Ft. Reduction)		
	Buildable Area (%)	Non-Buildable Area (%)	Buildable Area (%)	Non-Buildable Area (%)	% Change	Buildable Area (%)	Non-Buildable Area (%)	% Change	Buildable Area (%)	Non-Buildable Area (%)	% Change
002-025-11	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
005-091-08	44%	56%	52%	48%	18%	60%	40%	36%	68%	32%	55%
005-072-03	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
005-073-29	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
005-091-07	45%	55%	53%	47%	18%	61%	39%	36%	69%	31%	55%
002-034-07	52%	48%	58%	42%	12%	65%	35%	24%	71%	29%	35%
002-052-05	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-051-04	52%	48%	58%	42%	12%	65%	35%	24%	71%	29%	35%
002-086-10	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-095-09	52%	48%	58%	42%	12%	65%	35%	24%	71%	29%	35%
002-095-13	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-096-19	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-096-21	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-104-10	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-104-11	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
003-155-14	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
004-032-17	80%	20%	83%	17%	3%	86%	14%	7%	87%	13%	8%
003-210-30	92%	8%	94%	6%	2%	96%	4%	5%	96%	4%	5%
005-071-09	54%	46%	60%	40%	11%	66%	34%	21%	71%	29%	32%
004-020-23	78%	22%	82%	18%	5%	86%	14%	10%	88%	12%	12%
005-071-10	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
005-112-15	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
005-112-28	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
003-210-10	83%	17%	85%	15%	3%	87%	13%	5%	88%	12%	6%
004-032-13	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
004-032-09	81%	19%	84%	16%	3%	87%	13%	7%	88%	12%	8%

County of Inyo

Zoning and General Plan Design Standards Review and Update to Promote Residential Infill

004-040-04	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
004-040-22	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
002-036-10	56%	44%	61%	39%	10%	67%	33%	19%	72%	28%	29%
005-010-24	50%	50%	57%	43%	15%	65%	35%	30%	72%	28%	45%
004-070-42	51%	49%	59%	41%	14%	66%	34%	28%	73%	27%	42%
004-152-18	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
004-010-09	61%	39%	65%	35%	7%	69%	31%	14%	74%	26%	21%
005-066-01	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
018-290-54	55%	45%	62%	38%	13%	69%	31%	25%	76%	24%	38%
018-290-35	56%	44%	63%	37%	12%	70%	30%	24%	77%	23%	37%
002-036-01	59%	41%	65%	35%	10%	71%	29%	19%	76%	24%	29%
004-031-18	59%	41%	66%	34%	10%	72%	28%	21%	78%	22%	31%
005-113-32	59%	41%	65%	35%	10%	71%	29%	20%	77%	23%	30%
004-031-17	59%	41%	66%	34%	10%	72%	28%	21%	78%	22%	31%
002-055-12	59%	41%	66%	34%	12%	73%	27%	24%	80%	20%	35%
005-106-04	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
005-106-08	100%	0%	100%	0%	0%	100%	0%	0%	100%	0%	0%
005-074-29	72%	28%	79%	21%	10%	82%	18%	14%	85%	15%	18%
002-035-11	59%	41%	66%	34%	12%	73%	27%	24%	80%	20%	35%
004-031-31	76%	24%	79%	21%	4%	82%	18%	8%	85%	15%	13%
004-090-05	72%	28%	77%	23%	6%	81%	19%	12%	85%	15%	18%
005-146-07	100%	0%	100%	0%	0%	91%	9%	-9%	91%	9%	-9%
005-109-48	51%	49%	69%	31%	37%	78%	22%	53%	87%	13%	71%
004-101-09	75%	25%	79%	21%	6%	84%	16%	12%	88%	12%	18%
018-320-04	47%	53%	56%	44%	18%	65%	35%	36%	73%	27%	55%
018-340-09	-	-	-	-	-	-	-	-	-	-	-
026-044-01	81%	19%	84%	16%	4%	87%	13%	7%	90%	10%	11%
026-044-06	87%	13%	89%	11%	2%	90%	10%	3%	92%	8%	5%

4. ADU/Second Unit Development

This section analyzes the potential for ADU/Second Unit Development within the Big Pine, Independence, and Lone Pine communities, specifically for detached ADUs on lots with existing dwelling(s).

a. Methodology

This analysis aims to estimate the potential for detached ADU development within the Big Pine, Independence, and Lone Pine communities. The scope includes all parcels within these communities that permit residential development (including both residential and commercial zone districts) and have at least one existing primary dwelling. The focus of this analysis is on estimating the potential for new detached ADUs, strictly adhering to the allowances set forth by current California State ADU Law.

Under State ADU Law, the potential for detached ADUs is calculated as:

- One (1) detached ADU per single-family lot.
- Up to eight (8) detached ADUs on multi-family lots, provided that the number of new ADUs does not exceed the total number of existing residential units already on that parcel.

The data utilized for this analysis is derived from the 2025 Inyo County Assessor's database. Parcels were systematically sorted by community (Big Pine, Independence, and Lone Pine), then by property class (e.g., Single Family Residence (SFR), Apartments (APTS), Duplex, Triplex), and finally by zoning district (e.g., R-1, R-2, R-3, C-B, etc.). Assumptions for ADU potential are as follows.

- **Single-Family Parcels:** Parcels identified with a 'Single Family Residence (SFR)' property class were assumed to be single-family lots and thus assigned a potential for one (1) detached ADU.
- **Multi-Family Parcels:** Parcels identified with multi-family property classes (e.g., 'APTS', 'Duplex', 'Triplex') or explicitly indicating multiple existing residential units were categorized as multi-family lots. For these, the potential number of detached ADUs was capped at the lesser of eight (8) or the number of existing residential units as indicated by the assessor's data for that specific parcel. This ensures compliance with the State Law's cap based on existing units.

These data points provide an estimate of potential capacity based on available parcel data and State ADU Law. The identification of an existing primary dwelling on each parcel, which is a requirement for ADU development, is based solely on the 2025 County Assessor's property class data and does not include on-site verification or further confirmation of existing dwellings for each parcel.

The resulting data, presented in the tables below, represents the estimated potential number of detached ADUs per zoning district. The analysis does not account for other types of ADUs permitted under State ADU Law, such as attached ADUs or Junior Accessory Dwelling Units. Therefore, the presented figures represent a partial estimate of the total ADU potential.

b. ADU Capacity Analysis

Big Pine Community

In Big Pine, 511 out of 746 parcels allow for residential development (i.e., parcels within a residential or commercial zone district) and have an existing dwelling. **Table C-7** identifies these parcels for each zone district as well as the average and median parcel sizes and potential ADUs. An analysis is provided below.

Table C-7: Parcel Size of Zone Districts that Allows Residential Development – Big Pine

Zoning	Parcels Analyzed	Parcel Size (Square Feet)				Potential Detached ADUs
		Average	Q1	Median	Q3	
R-1	264	11,960	9,064	9,350	12,848	281
R-2	86	12,208	6,890	10,457	14,025	117
R-3	12	27,003	12,527	23,946	37,872	25
RR	1	51,442	51,442	51,442	51,442	1
PUD	124	8,767	7,194	7,734	8,859	124
C-B	24	11,888	9,149	11,983	14,437	29
Totals	511	--	--	--	--	577

**Parcels with multiple zones are not included in this table.*

- **R-1 zoning** represents the largest segment of parcels (52%) suitable for detached ADUs (281 potential ADUs). This means that a significant portion of Big Pine’s single-family residential land base has the capacity for ADU development, providing the greatest potential for increasing housing units. In addition, with a median size of 9,350 square feet and middle 50% of parcels ranging from 9,064 to 12,848 square feet, R-1 zoned lots are generally large enough to accommodate ADUs.
- **R-2 zoning** represents a sizable number of parcels (17%) suitable for detached ADUs (117 potential ADUs). R-2 parcels have a median size of 10,457 square feet with the middle 50% range between 6,890 and 14,025 square feet. Even at the lower end of this range, these lots are typically large enough to accommodate a primary dwelling and an ADU. Because R-2 zoning permits duplexes and higher densities than R-1 zoning, ADUs can further increase the density potential and support more housing.
- **R-3 zoning** represents a smaller number of parcels (2%) suitable for detached ADUs (25 potential ADUs). Of note, these parcels are large with an average size of 27,003 square feet and median of 23,946 square feet, which suggest the parcels could integrate ADUs alongside existing dwellings. Despite a smaller total count of parcels, the projected potential of 25 detached ADUs suggests that many parcels can accommodate more than one ADU, which can greatly increase the housing supply. Because R-3 zoning is designated for higher density, multi-family housing, ADUs could further optimize land use within this denser residential zone.
- **PUD zoning**, specifically PUD-ORD-326, represents a significant number of parcels (24%) suitable for detached ADUs (124 potential ADUs). PUD parcels have a sizable average size of 8,767 square feet, which is slightly smaller than R-1 and R-2 lots. On average, each PUD parcel could accommodate at least one (1) detached ADU.
- **C-B zoning** represents a smaller number of parcels (5%) suitable for detached ADUs (29 potential ADUs) but demonstrates a capacity to contribute to housing supply through mixed-use infill development within the commercial core of Big Pine. The median parcel size of 11,983 square feet and an average of 11,888 square feet could provide ample space for detached ADUs.

Independence Community

In Independence, 253 out of 433 parcels allow for residential development (i.e., sites within a residential or commercial zone district) and have an existing dwelling. **Table C-8** identifies the developable parcels for each zone district as well as the average and median parcel sizes potential ADUs. An analysis is provided below.

Table C-8: Parcel Size of Zone Districts that Allows Residential Development – Independence

Zoning	Parcels Analyzed	Parcel Size (Square Feet)				Potential Detached ADUs
		Average	Q1	Median	Q3	
R-1	177	9,301	6,503	6,819	10,228	193
R-2	50	8,642	6,503	6,502	12,268	57
R-3	2	34,642	25,991	34,642	43,293	4
C-B	24	9,707	6,503	6,503	13,006	24
Totals	253	--	--	--	--	278

**Parcels with multiple zones are not included in this table.*

- **R-1 zoning** represents the largest segment of parcels (70%) suitable for detached ADUs (193 potential ADUs). This means that a significant portion of Independence’s single-family residential land base has the capacity for ADU development, providing the greatest potential for increasing housing units. In addition, with a median size of 6,819 square feet and middle 50% of parcels ranging from 6,503 to 10,228 square feet, R-1 zoned lots are generally large enough to accommodate a primary dwelling and ADU.
- **R-2 zoning** represents a smaller number of parcels (20%) suitable for detached ADUs (57 potential ADUs). R-2 parcels have a median size of 6,502 square feet with the middle 50% range between 6,503 and 12,268 square feet. Even at the lower end of this range, these lots are typically large enough to accommodate a primary dwelling and an ADU. Because R-2 zoning permits duplexes and higher densities than R-1 zoning, ADUs can further increase the density potential and support more housing.
- **R-3 zoning** only accounts for two (2) parcels suitable for detached ADUs (4 potential ADUs); however, these parcels are large with an average and median size of 34,642 square feet which indicates there may be ample space for significant housing development.
- **C-B zoning** represents a smaller number of parcels (9%) suitable for detached ADUs (24 potential ADUs) but demonstrates a capacity to contribute to housing supply through mixed-use infill development within the commercial core of Independence. The median parcel size of 6,503 square feet and an average of 9,707 square feet could provide ample space for detached ADUs.

Lone Pine Community

In Lone Pine, 396 out of 644 parcels allow for residential development (i.e., sites within a residential or commercial zone district) and have an existing dwelling. **Table C-9** identifies the developable parcels for each zone district as well as the average and median parcel sizes potential ADUs. An analysis is provided below.

Table C-9: Parcel Size of Zone Districts that Allows Residential Development – Lone Pine

Zoning	Parcels Analyzed	Parcel Size (Square Feet)				Potential Detached ADUs
		Average	Q1	Median	Q3	
R-1	270	9,658	6,444	7,257	10,005	319
R-2	106	8,415	7,399	7,497	9,076	161
R-3	4	23,754	9,844	14,975	28,886	25
RR	1	210,039	210,039	210,039	210,039	1
C-2	1	11,817	11,817	11,817	11,817	8
C-3	1	5,002	5,002	5,002	5,002	2
C-B	13	5,589	5,002	5,002	5,002	21
Totals	396	--	--	--	--	537

**Parcels with multiple zones are not included in this table.*

- **R-1 zoning** represents the largest segment of parcels (68%) suitable for detached ADUs (319 potential ADUs). This means that a significant portion of Lone Pine’s single-family residential land base has the capacity for ADU development, providing the greatest potential for increasing housing units. In addition, with a median size of 7,257 square feet and middle 50% of parcels ranging from 6,444 to 10,005 square feet, R-1 zoned lots are generally large enough to accommodate a primary dwelling and ADU.
- **R-2 zoning** represents a smaller number of parcels (27%) suitable for detached ADUs (161 potential ADUs). R-2 parcels have a median size of 7,497 square feet with the middle 50% range between 7,399 and 9,076 square feet. Even at the lower end of this range, these lots are typically large enough to accommodate a primary dwelling and an ADU. Because R-2 zoning permits duplexes and higher densities than R-1 zoning, ADUs can further increase the density potential and support more housing.
- **R-3 zoning** only accounts for four (4) parcels suitable for detached ADUs (25 potential ADUs); however, these parcels are large with an average and median size of 23,754 square feet and a median of 14,975 square feet which indicates there may be ample space for significant housing development.
- **C-B zoning** represents a smaller number of parcels (3%) suitable for detached ADUs (21 potential ADUs) but demonstrates a capacity to contribute to housing supply through mixed-use infill development within the commercial core of Lone Pine. The median parcel size of 5,002 square feet and an average of 5,589 square feet could provide some space for detached ADUs.

c. *Key Takeaways*

Key takeaways from the ADU/second unit development capacity analysis are summarized below. Across all communities and zone types, State ADU Law can help increase housing capacity and the physical characteristics of most parcels appear generally conducive to accommodating the range of ADUs allowed.

Significant Overall ADU Potential on Existing Parcels

The three communities combined demonstrate a significant overall potential for more than 1,300 new detached ADUs (577 in Big Pine, 278 in Independence, and 537 in Lone Pine). This capacity is identified on parcels that allow residential development and have an existing dwelling(s), highlighting efficient use of the existing land base.

R-1 Zoning is the Largest Contributor to ADU Potential

In all three communities, R-1 zoning represents the largest proportion of suitable parcels (52% in Big Pine, 70% in Independence, and 68% in Lone Pine) and offers the highest number of potential detached ADUs. The median parcel sizes in R-1 zones across the three (3) communities are generally ample, ranging from approximately 6,819 square feet to 9,350 square feet, to be able to accommodate a primary dwelling and detached ADU.

Contributions from Other Zones

R-2 zones in all three (3) communities consistently provide a significant number of additional ADU opportunities on well-sized lots. R-3 zones, though fewer in number, demonstrate high ADU potential per parcel due to their very large lot sizes (e.g., median of 10,457 square feet in Big Pine, 7,491 square feet in Lone Pine), which allows for multiple detached ADUs. PUD zoning in Big Pine presents a significant opportunity for ADUs, with the potential for one (1) detached ADU per lot. Lastly, commercial zones contribute to ADU potential, with the potential for mixed-use development within core commercial areas.

Lot Sizes and Feasibility

The analysis shows that the median and quartile parcel sizes across most residential and commercial zones are generally large enough to accommodate primary dwelling(s) and detached ADUs. The availability of adequately sized lots, combined with allowances under State ADU Law, demonstrates a strong physical feasibility of ADU development as a strategy to increase housing opportunities.

D. Recommendations for Infill Residential Opportunities

Based on the analysis conducted, County review and verification of the findings, in addition to feedback received through community outreach and engagement efforts, PCE has identified specific recommendations for modifications to the General Plan and Zoning Ordinance that would increase infill residential opportunities. Any recommendations that would modify the General Plan and Zoning Ordinance will be reviewed for consistency between the two.

1. Recommendations to Align Zoning with General Plan Densities

Revise existing zoning use restrictions to align with the higher residential densities intended by the General Plan. The study identified a 52-unit discrepancy between the General Plan's maximum densities (247 units) and current zoning regulations (195 units). Updating zoning to match the General Plan would ensure that sites could be developed to their intended density, leading to more efficient land use and more opportunities for housing production. Examples of modifications to the Zoning Ordinance are shown below.

Ch. 18.30 R-1 DISTRICTS – ONE FAMILY RESIDENCES

§ 18.30.030 Permitted uses.

The following principal uses are permitted in an R-1 district:

- A. ~~One~~ *Single-family dwelling(s) on a lot, including single-family mobilehomes. Number of dwellings to be determined by the general plan;*

Ch. 18.33 R-2 DISTRICTS – MULTIPLE RESIDENTIAL

§ 18.33.020 Permitted uses.

The following principal uses are permitted in an R-2 district:

- A. ~~One~~ *Single-family dwelling(s) on a lot; two separate single-family dwellings, including single-family mobile homes. Number of dwellings to be determined by the general plan;*
- B. *Duplex, including two-family mobile homes;*
- C. *Multiple-family dwelling(s). Number of dwelling units to be determined by the general plan;*

2. Recommendations to Maximize Buildable Area through Setback Adjustments

Implement targeted reductions in front and rear yard setback requirements for residential zones (R-1, R-2, R-3). Modeling demonstrated that reducing setbacks by 5, 10, or 15 feet significantly increases the buildable area on parcels (e.g., up to a 20% average increase for R-1 lots with a 15-foot reduction). This increased flexibility in buildable area allows for larger or more efficiently designed residential units, maximizing the housing potential of each lot. Examples of modifications to the Zoning Ordinance are shown below; of note, modifications can be made Countywide or limited to infill areas.

Ch. 18.30 R-1 DISTRICTS – ONE FAMILY RESIDENCES

§ 18.30.070 Yards.

The minimum requirements for yards in R-1 districts shall be as follows:

A. Depth of front yard, subject to the exceptions set forth by the general regulations, ~~twenty-five feet~~ **[select one:]** twenty-feet, fifteen feet, ten feet;

B. Depth of rear yard, ~~twenty feet~~ **[select one:]** fifteen feet, ten feet, five feet;

Ch. 18.33 R-2 DISTRICTS – MULTIPLE RESIDENTIAL

§ 18.33.050 Yards.

The minimum requirements for yards in the R-2 district shall be as follows:

A. Depth of front yard: ~~twenty-five feet~~ **[select one:]** twenty-feet, fifteen feet, ten feet;

B. Depth of rear yard: ~~twenty feet~~ **[select one:]** fifteen feet, ten feet, five feet;

3. Recommendations to Enhance ADU Development

- **Allow for more detached ADUs beyond State Minimums:** Given the community’s general support for ADUs, increasing the permitted number of detached ADUs could accelerate housing production. This approach would maximize the utilization of larger parcels, particularly in R-1, R-2, R-3, and PUD zones where ample lot sizes have been identified. Any expansion should be balanced with considerations for infrastructure capacity and emergency services.
- **Zoning Clarification for ADUs:** Amend the Zoning Ordinance to explicitly state that ADUs are a distinct housing type and not classified as general "accessory buildings."
- **Integrate ADUs into Zoning as a Permitted Use:** Clearly designate ADUs as permitted uses within relevant residential (e.g., R-1, R-2) and mixed-use (e.g., CB) zoning districts.
- **Broaden ADU Types:** Define Manufactured Homes and Tiny Homes as permissible ADU types within the Zoning Ordinance, establishing clear and specific development standards for them.
- **Provide Comprehensive ADU Resources:** Develop and distribute an ADU Guidebook and informational handout to streamline the development process for homeowners.

4. Adaptive Reuse of Existing Buildings

Consider implementing an Adaptive Reuse Ordinance to encourage the repurposing of non-residential (possibly older, vacant, or dilapidated) buildings into housing. By offering relief from typical development standards (like reduced parking and increased height limits), providing incentives (such as increased density and streamlined application processing), and utilizing objective design standards, the County can make it easier and more cost-effective for owners to create new dwelling units. Possible considerations include a rolling eligibility date (e.g., those over a certain age, or those that have been vacant for a certain time) and a requirement for a minimum number of dwelling units per project, ensuring the primary focus is providing more housing opportunities.