



City of El Centro 2021-2029 Housing Element

March 2022

City of El Centro
Community Development Department
1275 W. Main Street
El Centro, CA 92243

City of El Centro
2021-2029 Housing Element

City Council

Tomas Oliva, Mayor
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Evelia Jimenez, Commissioner
Sergio Lopez, Commissioner
Aaron Popejoy, Commissioner
Ashley Bertussi, Commissioner
Ramiro Urias, Commissioner

City Staff

Angel Hernandez, Interim Director of Community Development
Christian Rodriguez, Assistant Planner
Marisol Abbott, Planning Staff Assistant

Consultants

Veronica Tam and Associates, Inc.
CityPlace Planning

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1. Introduction

1.1. Legislative Requirements

The Housing Element is one of seven elements required to be included in the City's General Plan. State law identifies the subjects that must be addressed in a Housing Element. These guidelines are identified in Article 10.6 of the State of California Government Code (Sections 65580 et seq.).

State law specifies that the Housing Element must assess housing needs and evaluate the current housing market in the City and then identify programs that will meet housing needs. The housing market evaluation includes a review of housing stock characteristics as well as housing cost, household incomes, special need households, availability of land and infrastructure and various other factors. Also included in this evaluation is the community's "Regional Housing Needs Allocation" (RHNA) which provides an estimate of the number of housing units that should be provided in the community to meet its share of new households in the region. In addition to this information, the Housing Element document must evaluate and review its past housing programs and consider this review in planning future housing strategies.

The City's previous Housing Element was adopted in 2013. Until recently, Housing Elements have been required to be updated every five years, unless otherwise extended by State law. Senate Bill 375, enacted in 2008, established an eight-year cycle for housing element updates. The statutory planning period for this Housing Element begins on October 15, 2021 and extends through October 15, 2029. However, the RHNA period begins June 30, 2021, and extends through October 15, 2029.

The 2021-2029 Housing Element is subject to review by the California Department of Housing and Community Development (HCD) for compliance with applicable State laws. A critical component of HCD's review of the Housing Element is the local jurisdiction's ability in accommodating its RHNA through land use planning efforts. Compliance with this requirement is measured by the jurisdiction's ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Southern California Association of Governments (SCAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region.

For the 2021-2029 Housing Element update for the City of El Centro, SCAG has assigned a RHNA of 3,442 units, in the following income distribution:

- | | |
|---|-------------|
| ▪ Extremely Low/Very Low Income: ¹ | 1,001 units |
| ▪ Low Income: | 490 units |
| ▪ Moderate Income: | 462 units |
| ▪ Above Moderate Income: | 1,489 units |

The City must demonstrate its ability to accommodate the RHNA in this Housing Element.

1.2. Relationship with Other General Plan Elements

The General Plan for the City of El Centro has eight elements in addition to this Housing Element. In June 2021, the City adopted updated Land Use and Mobility Elements, and added a new Environmental Justice Element. The other General Plan elements include Economic Development, Conservation/Open Space, Public Facilities, Safety, and Noise, and were adopted in 2004. The General Plan includes both mandatory elements plus two optional elements, as permitted by State law. Internal consistency is required by State law among the various elements of the General Plan, including the Housing Element. This 2021-2029 Housing Element is consistent with the adopted General Plan.

California Senate Bill 1241 (SB 1241) was passed by the California legislature in 2012, which required jurisdictions to update their Safety Elements upon the next revision of the Housing Element, on or after January 1, 2014. The City will ensure compliance with this requirement by updating its Safety Element. To maintain internal consistency among all General Plan elements, the City will conduct a consistency review annually as part of its report on the General Plan implementation and identify necessary revisions.

1.3. Public Participation

The City of El Centro offers ample opportunities for the public to comment on housing-related issues and on the Draft 2021-2029 Housing Element. A list of agencies and organizations contacted to participate in the planning process and detailed summary of comments is contained in Appendix A. Due to the COVID-19 pandemic, public engagement was held virtually.

A. Housing Element Workshops

¹ The City has a RHNA allocation of 1,001 very low income units (inclusive of extremely low income units). Pursuant to AB 2634, the City must project the number of extremely low income housing needs based on Census income distribution or assume 50 percent of the very low income units as extremely low. Assuming an even split, the City's RHNA allocation of 1,001 very low income units may be divided into 501 very low and 500 extremely low income units. However, for purposes of identifying adequate sites for the RHNA, State law does not mandate the separate accounting for the extremely low income category.

The City conducted two Housing Element Workshops on February 8, 2021 and May 19, 2021 to discuss the Housing Element update process and solicit stakeholder and public comments on housing issues and needs. The following topics were covered at each Workshop:

- February 8, 2021: Introduction to the Housing Element Update process, requirements, RHNA units, and possible strategies to meet RHNA.
- May 19, 2021: Review strategies to meet RHNA, including location of sites, and review Housing Programs.
- August 19, 2021: Review Draft Housing Element, including overview of Housing Element, strategies to meet RHNA, housing programs, AFFH findings, and next steps in the review and adoption process. Attendees were informed the draft would be available starting Monday August 23 for public review.

Notices of the meeting were published in English and Spanish in the Imperial Valley Press. The notices were also posted on City website and flyers were made available at public counters. In addition, special invitations were sent to housing developers, advocates, community stakeholders, and agencies that serve the housing and supportive service needs of lower and moderate income persons, as well as those with special housing needs. Agencies and organizations invited to attend the study session are listed in Appendix A. The meetings were attended by members of the public and representatives of the development community and non-profit organizations.

B. Stakeholder Interviews

A number of developers and service providers that are active in El Centro were contacted by to discuss El Centro's housing issues and needs. Three focus group interviews were held on:

- March 30, 2021 - service providers
- April 1, 2021 - developers
- April 21, 2021 - CLB, a nationwide mall developer that owns the Imperial Valley Mall (IVM) and additional property north of the IVM in El Centro

The list of organizations interviewed, and a summary of each conversation is included in Appendix A.

C. Draft Housing Element Review

The City conducted a community workshop on August 19, 2021 to review the draft Housing Element. To solicit input from supportive service and housing providers, the City sent special notices of the public meeting to housing developers and professionals, as well as agencies that serve or represent the interest of lower and moderate income households and persons with special housing needs. The City also advertised the availability of the Housing Element for public review in English and Spanish in the Imperial Valley Press and in Spanish in the Adelante Valle, a Spanish language newspaper. The Housing Element outreach list is presented in Appendix A. The Draft Housing Element was then made available to the public for review beginning August 23, 2021.

D. Adoption Hearings

For the adoption of the 2021-2029 Housing Element, the City conducted public hearings before the Planning Commission on December 14, 2021 and before the City Council on February 1, 2022. The Final Draft Housing Element has been available for public review since December 8, 2021.

E. Summary of Public Comments and City Responses

Affordable housing, especially for lower income, seniors, large households, and persons with disabilities are among some of the key issues raised during the public participation process of this Housing Element update. Public service providers also brought up the need for more fair housing protection for special needs groups. Not only is there a need for more affordable housing, but housing of different types and other housing assistance like closing costs, rental assistance, neighborhood clean-up, habitability. On the other hand, developers expressed that long processing periods and high fees were a constraint for development in the City. A full summary of comments and City responses is found on Appendix A.

The Housing Element addresses these needs through a variety of programs targeted to conserve the existing affordable housing stock, facilitate construction of new affordable housing, and coordinate with and fund social service agencies, including organizations that support extremely low income seniors and persons with disabilities.

2. Community Profile

The purpose of this section is to summarize and analyze the existing housing conditions in the City of El Centro. This section contains an analysis of population trends, employment trends, household trends and special needs groups within the City.

2.1. Demographic Profile

When evaluating housing needs, analysis of demographic variables such as population, employment, and households is essential in order to assess the present and future housing needs of a city or county. This section presents data gathered from the following sources: U.S. Census Bureau, American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS), U.S. Department of Housing and Urban Development (HUD), California Department of Housing and Community Development (HCD), California Employment Development Department, Southern California Association of Governments (SCAG), Imperial Valley Housing Authority (IVHA), DataQuick, and Craigslist.org.

A. Population Trends

Between 2000 and 2010, the population in El Centro increased by 4,763 residents (or 12.6 percent), from 37,835 to 42,598 residents, an increase of over one percent every year. As shown in Table 1, over the subsequent decade, from 2010 to 2021, the population increased by an additional 1,913 persons (or 5.6 percent) for a low annual growth rate of approximately 0.5 percent. El Centro is the largest City in Imperial County and the seat of County Government and its growth rate was similar to the County's growth rate between 2010 and 2021 (6.6 percent). The City's growth rate was also similar to most of the County's incorporated cities. However, Imperial and Brawley both saw higher increases in population than the City of El Centro and the County overall.

Table 1: Population Trends – El Centro and Neighboring Cities (2000-2021)

City	2000	2010	2021	Change (2010-2021)	
				# of Persons	% Change
El Centro	37,835	42,598	44,997	2,399	5.6%
Calexico	27,109	38,572	40,485	1,913	5.0%
Brawley	22,052	24,953	27,326	2,373	9.5%
Imperial	7,560	14,758	20,289	5,531	37.5%
Holtville	5,612	5,939	6,236	297	5.0%
Westmorland	2,131	2,225	2,305	80	3.6%
Imperial County	142,361	174,528	186,034	11,506	6.6%

Source: U.S. Bureau of the Census, 2000-2010, California Department of Finance, 2021 Population Estimates.

B. Age Trends

As shown in Table 2, over the last ten years, the City of El Centro has experienced an increase in the number of persons in almost every age group. A 3.3 percent increase occurred in the middle age and older adult age groups (ages 50+), with one percent more residents being over 85. El Centro residents ages 30 and under continue to represent a large proportional share of the City’s population, although their share decreased 1.9 percentage points from 47.9 percent to 46 percent. The largest share of residents in 2010 was between 10 and 14. In 2019 this was still the largest share of the population, but the percentage went down by a half percent. As of 2019, the median age in the City was 32.9 years of age, which is significantly older than the median age in 2010.

Table 2: Population by Age Trends (2010-2019)

Age Group	2010		2019	
	# of Persons	% of Total	# of Persons	% of Total
Under 5 Years	3,368	8.1%	3,681	8.4%
5-9 Years	3,451	8.3%	3,490	7.9%
10-14 Years	3,784	9.1%	3,767	8.6%
15-19 Years	3,701	8.9%	3,311	7.5%
21-24 Years	2,869	6.9%	3,122	7.1%
25-29 Years	2,744	6.6%	2,870	6.5%
30-34 Years	2,453	5.9%	3,100	7.0%
35-39 Years	2,661	6.4%	2,263	5.1%
40-44 Years	2,453	5.9%	2,967	6.7%
45-49 Years	2,952	7.1%	2,187	5.0%
50-54 Years	2,952	7.1%	2,365	5.4%
55-59 Years	2,329	5.6%	2,635	6.0%
60-64 Years	1,580	3.8%	2,371	5.4%
65-69 Years	1,289	3.1%	2,038	4.6%
70-74 Years	1,123	2.7%	1,340	3.0%
75-79 Years	915	2.2%	1,098	2.5%
80-84 Years	582	1.4%	574	1.3%
85+ Years	374	0.9%	824	1.9%
Total	41,581		44,003	
Median Age	29.9		32.9	

Source: ACS 2005-2010 5-year estimates, ACS 2013-2019 5-year estimates

C. Race/Ethnicity

In 2019, the racial/ethnic composition of City residents was similar to that of County residents, however the City has a larger Hispanic or Latino population by 2.8 percent. As shown in Table 3, approximately 87 percent of the City’s population categorized themselves as Hispanic (of any race) with the remaining population identifying themselves as non-Hispanic (of one or more races). The County has a higher percentage of white people by 2.3 percent, while the County has a larger Black or African American population.

Table 3: Population by Race and Ethnicity (2019)

Category	City of El Centro		Imperial County	
	# of Persons	% of Total	# of Persons	% of Total
Not Hispanic or Latino	5,702	13.0%	28,529	15.8%
White	3,654	8.3%	19,228	10.6%
Black or African American	602	1.4%	3,882	2.1%
American Indian/Alaska Native	42	0.1%	1,104	0.6%
Asian	980	2.2%	2,367	1.3%
Native Hawaiian/Pacific Islander	79	0.2%	240	0.1%
Other Races or 2+ Races	345	0.8%	1,708	0.9%
Hispanic or Latino (any race)	38,301	87.0%	152,172	84.2%
Total	44,003	100.0%	180,701	100.0%

Source: ACS 2013-2019 5-year estimates

2.2. Economic Profile

A. Employment

According to the 2015-2019 American Community Survey (ACS), the City’s labor force in 2019 consisted of 18,067 people and the unemployment rate was 13.1 percent. The occupational category employing the most El Centro residents was management, business, science, and arts, which employed 28.9 percent of the City’s workforce (see Table 4). In terms of total employment, service occupations were the second largest occupational category in El Centro.

Table 4: Employment by Industry Type (2015-2019)

Occupational Category	2015-2019
	% of Employed Persons
Management, Business, Science, and Arts Occupations	28.9%
Service Occupations	22.6%
Sales and Office Occupations	23.5%
Natural Resources, Construction, and Maintenance Occupations	12.2%
Production, Transportation, and Material Moving Occupations	12.9%

Source: American Community Survey (ACS), 2015-2019

As shown in Table 5, between 2015 and 2019, most of the City’s labor force lived fairly near their place of employment. The mean travel time to work was 18 minutes; approximately 50.2 percent of commuters in the City traveled less than 15 minutes each way to work and 21.3 percent commuted less than 10 minutes.

Table 5: Employment by Commuting Patterns (2015-2019)

Commute to Work	% of Employed Persons
Less than 10 minutes	21.3%
10 to 14 minutes	28.9%
15 to 19 minutes	18.6%
20 to 24 minutes	11.9%
25 to 29 minutes	4.1%
30 to 34 minutes	6.8%
35 to 44 minutes	1.9%
45 to 59 minutes	2.5%
60 or more minutes	3.9%
Mean travel time to work (minutes)	18.0

Source: American Community Survey (ACS), 2015-2019

According to the 2015-2019 ACS, only 14 persons (or less than one percent of employed persons in the City) were classified as military personnel. However, Naval Air Facility (NAF) El Centro is a military airport and training facility located just outside city limits, approximately six miles northwest of the City. The facility was initially commissioned on May 1, 1946, as a Naval Air Station. Prior to that, the base was a Marine Corps Air Station. For the first 35 years of its existence, the mission of NAF El Centro was devoted to aeronautical escape system testing, evaluation, and design. Over time, the facility has developed into an integral part of Naval Aviation Training. Today, NAF El Centro provides realistic training to active and reserve military units. Squadrons visit the installation and its associated ranges to practice gunnery, bombing, carrier landings and air combat.

According to the 2014 NAF-El Centro Joint Land Use Study, the installation provides employment for more than 597 government personnel (including 303 civilians) who live there year-round to serve the 1,600 military personnel in training at NAF in any given month. These military personnel come from Navy, Marine Corps, Army, and Air Force installations throughout the United States. Foreign military services also send personnel to train at NAF El Centro. Many of these training deployments extend over 30 days, and the military personnel are dependent on many local businesses and services during their training deployments.

NAF contributes over \$105 million to the local economy each year (\$24M in payroll, \$4M in taxes and \$77M in industrial output). It also provides Fleet and Family Support programs that assist with housing, social services, children’s programs and food.

B. Household Income

In 1989, a significant percentage of households in the City (32.1 percent) had annual incomes less than \$25,000 per year. In that same year, households with annual incomes over \$75,000 accounted for 15.5 percent of total households. Between 1989 and 2000, the City’s households became increasingly stratified economically. There were noticeable increases in the overall number and proportion of households with lower (less than \$25,000) and higher incomes (\$75,000 and greater), while the proportion of households earning middle incomes (\$25,000 to \$74,999) decreased.

Between 2000 and 2011, the percentage of those earning less than \$25,000 increased (from 15.9 to 17.5 percent), and between 2011 and 2019, it decreased to a level lower than in 2000 (from 17.5 back down to 13.9 percent). During this same time, the percentage of people earning in the middle of the range of income – from 25,000 to \$75,000 – decreased significantly, by 9.5 percent. From 2011 to 2019, this income range regained some ground, but was still 6.3 percent less than in 2000. Between 2000 and 2011, the percentage of those earning above \$75,000 increased dramatically, by 11.5 percent. This trend continued through 2019 as the percentage of higher income residents increased by another 4.3 percent.

Although El Centro’s distribution of household income roughly mirrored the countywide distribution, the income profile of El Centro’s households differed significantly from households throughout the State. The 2015-2019 ACS reported that 14.9 percent of California households had incomes below \$25,000 (compared to 29.6 percent in El Centro) and 40.5 percent of statewide households had incomes over \$100,000 (compared to 20.3 percent in El Centro).

Table 6: Household Income (2000-2019)

Income Ranges	2000		2010		2019	
	# of Households	% of Total	# of Households	% of Total	# of Households	% of Total
Less Than \$10,000	1,586	13.9%	1,294	9.9%	673	5.8%
\$10,000-\$14,999	1,071	9.4%	1,268	9.7%	1,156	9.9%
\$15,000-\$24,999	1,818	15.9%	2,292	17.5%	1,614	13.9%
\$25,000-\$34,999	1,401	12.2%	1,349	10.3%	1,023	8.8%
\$35,000-\$49,999	1,789	15.6%	1,491	11.4%	1,643	14.1%
\$50,000-\$74,999	2,089	18.2%	1,935	14.8%	1,955	16.8%
\$75,000-\$99,999	842	7.4%	1,337	10.2%	1,213	10.4%
\$100,000+	853	7.5%	2,126	16.2%	2,348	20.3%
Total	11,449	100.0%	13,092	100.0%	11,625	100.0%

Source: U.S. Bureau of the Census, 2000-2010, American Community Survey (ACS), 2015-2019

In 2019, Imperial County’s median income was \$53,424; the median income in the City of El Centro was higher than the County median (see Table 7). The City’s median income increased substantially - by 39.5 percent - between 2011 and 2019. The City of El Centro became more affluent relative to the County because of the larger number of higher income earners.

Table 7: Median Household Income Trends (2000-2019)

Year	Median Income	\$ Change	% Change	Annual % Change
City of El Centro				
2000	\$41,534			
2011	\$38,297	-\$3,237	-7.8%	-0.7%
2019	\$53,424	\$15,127	39.5%	4.9%
Imperial County				
2000	\$38,724			
2011	\$39,402	\$678	1.8%	0.2%
2019	\$47,622	\$8,220	20.9%	2.4%

Sources: U.S. Bureau of the Census, 2000; American Community Survey (ACS), 2015-2019

For planning and funding purposes, the State Department of Housing and Community Development (HCD) categorizes households into five income groups based on the County Area Median Income (AMI):

- Extremely Low Income - up to 30 percent of AMI
- Very Low Income - 31 to 50 percent of AMI
- Low Income - 51 to 80 percent of AMI
- Moderate Income - 81 to 120 percent of AMI
- Above Moderate Income - greater than 120 percent of AMI

Combined, extremely low, very low, and low income households are often referred to as lower income households.

The Southern California Association of Governments (SCAG) tabulated household income data by using the 2014-2018 ACS. As shown in Table 8, 43 percent of the City's households earned lower incomes, similar to Imperial County households. SCAG data does not separately identify the extremely low income group.

Table 8: Households by Income Categories (2014-2018)

Income Group	City of El Centro	Imperial County
Very Low (31 to 50%)	27%	27%
Low (51 to 80%)	16%	15%
Moderate (81 to 120%)	15%	14%
Above Moderate (>120%)	42%	44%

Source: SCAG RHNA Calculator, March 2021

2.3. Household Characteristics

A household is defined as all persons occupying a housing unit. Families are a subset of households, and include all persons living together who are related by blood, marriage, or adoption. Single households include persons living alone in housing units, but do not include persons in group quarters such as convalescent homes or dormitories. Other households are unrelated people living together, such as roommates. Household characteristics play an important role in defining community needs. Household type, income and tenure can help to identify special needs populations as well as other factors that affect the housing needs of a community.

A. Household Type and Size

Household types and sizes can change even in periods of static population growth as adult children leave home, married couples divorce, or with the general aging of the population. El Centro’s growth rate has been lower than the growth rate of the County.

According to data gathered from the Census and the ACS (see Table 9), between 2000 and 2010, the number of households in the County increased by 24.7 percent to 49,126 units. During the same time, the number of households in the City increased only by 14.6 percent. Between 2010 and 2019, the number of households in the City of El Centro decreased by 1,669 (or 11.3 percent), while the County’s decreased by 8.7 percent. These decreases, however, may partially be a result of the American Community Survey data that tends to have large margins of errors for small communities.

Table 9: Household Trends (2000-2019)

Year	# of Households	# Change	% Change	Annual % Change
City of El Centro				
2000	11,439			
2010	13,108	1,669	14.6%	1.5%
2019	11,625	-1,483	-11.3%	-1.3%
Imperial County				
2000	39,384			
2010	49,126	9,742	24.7%	2.5%
2019	44,829	-4,297	-8.7%	-1.0%

Source: U.S. Bureau of the Census, 2000-2010, American Community Survey (ACS), 2015-2019

Household size is a significant factor in housing demand. Often, household size can be used to predict the unit size that a household will select. For example, small households (one and two persons per household) traditionally can find suitable housing in units with up to two bedrooms while large households (five or more persons per household) can usually find suitable housing in units with three to four bedrooms. During the previous decade, the average household size in both El Centro and the County increased (see Table 10).

Table 10: Average Persons-Per-Household Trends (2010-2019)

Year	City of El Centro	County
2010	3.09	3.34
2019	3.74	3.81

Source: ACS 2006-2010, ACS 2015-2019

This is the case even though the number of two-person El Centro households increased the most (see Table 11). Four-person households in the City also increased, while the number of large households (those with five people or more) decreased in both the City and the County. One- and two-person households increased in the County between 2010 and 2019.

Table 11: Household Size Trends (2010-2019)

Household Size	2010		2019	
	# of Households	% of Total	# of Households	% of Total
City of El Centro				
1-Person	2,156	18.8%	2,185	18.8%
2-Person	2,584	22.6%	3,272	28.1%
3-Person	2,013	17.6%	1,903	16.4%
4-Person	2,049	17.9%	2,233	19.2%
5-Person	1,445	12.6%	1,195	10.3%
6+ Person	1,192	10.4%	837	7.2%
Imperial County				
1-Person	6,724	17.1%	9,235	20.6%
2-Person	9,067	23.0%	11,633	25.9%
3-Person	6,660	16.9%	7,847	17.5%
4-Person	7,161	18.2%	7,496	16.7%
5-Person	5,117	13.0%	4,618	10.3%
6+ Person	4,655	11.8%	4,000	8.9%

Source: U.S. Bureau of the Census, 2010, ACS 2015-2019

B. Housing Tenure

Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. The tenure distribution of a community's housing stock can be an indicator of several aspects of the housing market, including the affordability of units, household stability and residential mobility among others. In most communities, tenure distribution generally correlates with household income, composition and age of the householder.

Households in the City of El Centro in 2010 were almost equally split in terms of tenure, with slightly under one-half of the City's households owning their homes and slightly over one-half renting their homes. The County, in 2010, had 11.8 percent more owners than renters. As of 2019, the City of El Centro continues to have a lower proportion of owner-households than Imperial

County (see Table 12) by 4.7 percent, but the percentage of owner-households in El Centro has increased 1.6 percent since 2010.

Table 12: Tenure (2010-2019)

Household Size	El Centro		County	
	# of Households	% of Total	# of Households	% of Total
2010				
Owners	6,488	49.5%	27,465	55.9%
Renters	6,620	50.5%	21,661	44.1%
2019				
Owners	5,909	50.8%	26,772	55.5%
Renters	5,716	49.2%	21,460	44.5%

Source: U.S. Bureau of the Census, 2010-2019.

As shown in Table 13, more (61.3 percent) of owner-households resided in single-family detached residences, compared to the 36.5 percent of renter-households residing in single-family residences. A much greater proportion of renter-occupied housing is in multi-family buildings consisting of 3 units or more (51.9 percent of rental units compared to 26.6 percent owned units).

Table 13: Housing Type by Tenure (2015-2019)

Units in Structure	Total Units	Owner-Occupied	Owner-Occupied %	Renter-Occupied	Renter - Occupied %
1, Detached	7,127	5,038	61.3%	2,089	36.5%
1, Attached	194	80	1.7%	114	2.0%
2	305	8	2.6%	297	5.2%
3 or 4	818	61	7.0%	757	13.2%
5 to 9	797	0	8.4%	979	17.1%
10 or More	1,255	21	10.8%	1,234	21.6%
Mobile Home	947	562	8.1%	246	4.3%
Total	11,625	6,489	100.0%	5,716	100.0%

Source: U.S. Bureau of the Census, American Community Survey (ACS), 2015-2019

2.4. Housing Problems

While the SCAG data presented on in Table 8 estimates the number of households that fall within each income level, it does not provide any detail on the specific housing needs and problems faced by these households. The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census Bureau for HUD, however, provides detailed information on housing needs by income level for different types of households in El Centro. Detailed CHAS data based on the 2013-2017 ACS data is displayed in Table 14. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

Most lower and moderate income households cope with housing cost issues either by assuming a cost burden, or by occupying a smaller-than-needed or substandard unit. Specifically, according to HUD, 70 percent of all of the City's lower income households were experiencing one or more housing problems (e.g. cost burden, overcrowding, or substandard housing condition) between 2013 and 2017.²

The types of housing problems experienced by El Centro households vary according to household income, type, and tenure. Some highlights include:

- In general, renter-households had a higher level of any housing problems (57.3 percent) compared to owner-households (32.1 percent).
- Large renter-families had the highest level of housing problems regardless of income level (68.4 percent).
- Approximately 84 percent of all extremely low income (households earning less than 30 percent of the AMI) and 83 percent of very low income households (households earning between 31 and 50 percent of the AMI) had housing problems.
- Over half of extremely low income elderly renters and owners (59 percent and 52 percent, respectively) experience a severe housing cost burden (i.e. spent more than 50 percent of their income on housing).

² U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS) data based on 2013-2017 ACS.

Table 14: Housing Assistance Needs of Lower Income Households (2013-2017)

Household by Type, Income, and Housing Problem	Renters				Owners			Total House holds
	Elderly	Small Families	Large Families	Total Renters	Elderly	Large Families	Total Owners	
Extremely Low Income (0-30% AMI)	615	505	205	1,460	210	30	435	1,895
With Any Housing Problem	72.4%	93.1%	100.0%	84.6%	76.2%	100.0%	80.5%	83.6%
Cost Burden >30%	69.9%	93.1%	95.1%	82.9%	66.7%	100.0%	67.8%	79.4%
Cost Burden > 50%	58.5%	70.3%	73.2%	65.1%	52.4%	66.7%	56.3%	63.1%
Very Low Income (31-50% AMI)	420	775	235	1,515	150	130	430	1,945
With Any Housing Problem	70.2%	89.7%	89.4%	83.8%	50.0%	92.3%	80.2%	83.0%
Cost Burden >30%	60.7%	88.4%	48.9%	74.3%	50.0%	69.2%	74.4%	74.3%
Cost Burden > 50%	19.0%	25.2%	8.5%	20.5%	26.7%	23.1%	43.0%	25.4%
Low Income (51-80% AMI)	230	475	190	1,030	245	150	910	1,940
With Any Housing Problem	60.9%	51.6%	78.9%	59.7%	26.5%	43.3%	47.3%	53.9%
Cost Burden >30%	60.9%	43.2%	31.6%	47.1%	26.5%	20.0%	43.4%	45.4%
Cost Burden > 50%	6.5%	3.2%	0.0%	2.9%	4.1%	0.0%	9.3%	5.9%
Moderate & Above Income (>80% AMI)	195	1,150	305	1,990	945	830	4,120	6,110
With Any Housing Problem	0.0%	16.1%	24.6%	15.8%	11.1%	30.7%	18.7%	17.8%
Cost Burden >30%	0.0%	8.7%	0.0%	6.8%	8.3%	10.8%	12.8%	10.9%
Cost Burden > 50%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total Households	1,460	2,905	935	5,995	1,550	1,140	5,895	11,890
With Any Housing Problem	60.3%	54.9%	68.4%	57.3%	26.1%	41.2%	32.1%	44.8%
Cost Burden >30%	56.5%	50.3%	39.6%	49.3%	23.1%	21.1%	26.1%	37.8%
Cost Burden > 50%	31.2%	19.4%	18.2%	21.5%	10.3%	4.4%	8.7%	15.2%

Note: Data presented in this table are based on special tabulations from the American Community Survey (ACS) data. Due to the small sample size, the margins are errors can be significant. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) tabulations of 2013-2017 ACS data

A. Cost Burden

Housing cost burden is defined as a housing cost that exceeds 30 percent of a household's gross income. A severe cost burden is a housing cost that exceeds 50 percent of a household's gross income.³ Housing cost burden is particularly problematic for low and moderate income households in that it leaves little resources for a household to pay for other living expenses.

The ACS calculated the percentage of income expended on housing costs for both renters and owners over a three-period of 2013-2017 and the estimates are considered an average for that time period. This five-year survey period includes the easing of the foreclosure crises and a decrease in unemployment. The estimates discussed below may, therefore, reflect a decrease from previous years' estimates, reflecting an improvement for many households in the balance between housing costs and pay, except for extremely low income households.

Between 2013 and 2017, a total of 4,493 or 37.8 percent, of all households in the City of El Centro paid in excess of 30 percent of their income for shelter (see Table 14 above). Cost burden varies by tenure. About 26 percent (1,538) of the City's owner-households overpaid for housing, while approximately 49 percent (2,955) of renter-households overpaid for housing. The cost burden situation is particularly critical for those households with the lowest annual incomes. Of extremely low income households, 79 percent (1,505) overpaid for housing. About 74 percent (1,445) of very low income households also experienced a housing cost burden. Lower income renter-households were also more affected by cost burden than lower income owners. About 1,210 (83 percent) of extremely low income renter-households experienced housing cost burdens (>30 percent) compared to 295 (68 percent) extremely low income owner-households. Very low income renter-households and owners experienced similar rates of cost burdens (74 percent; 1,125 renter households and 320 owner-households).

Severe housing cost burden is of even greater concern, particularly when those affected are lower income households. Approximately 435 owner-households are considered to be in the extremely low income category and over half (56 percent or 245) of these households experienced a severe housing cost burden between 2013 and 2017. Similarly, of all renter-households within the City, 1,460 are considered to be in the extremely low income category and a majority of these households (65 percent or 950) spend more than half of their net household income on housing. As indicated in Table 14 as household income increases, cost burden generally decreases.

³ A household spending more than 30 percent of its gross household income on housing is considered cost-burdened both by the State Department of Housing and Community Development (HCD) and the U.S. Department of Housing and Urban Development (HUD).

B. Overcrowding

An overcrowded unit is defined by the Census as having more than one person or more per room, excluding kitchens and bathrooms. A severely overcrowded unit has 1.5 or more persons per room. Generally, a room is defined as a living room, dining room, bedroom, or finished recreation room.

According to the 2015-2019 ACS, approximately 12.0 percent of all households in the City are considered to be overcrowded (see Table 15). Overcrowding was much more likely to affect renter-households (17.1 percent) than owner-households (7.0 percent). Severe overcrowding was also more prevalent among renter households than owner households (4.8 percent and 3.0 percent).

Table 15: Overcrowded Units by Tenure (2015-2019)

Persons per Room	Owner		Renter		Total	
	#	%	#	%	#	%
1.00 or less	5,495	93.0%	4,737	82.9%	10,232	88.0%
1.01 or to 1.50	235	4.0%	704	12.3%	939	8.1%
1.51 or more	179	3.0%	275	4.8%	454	3.9%
Total	5,909		5,716		11,625	
% Overcrowded by Tenure		7.0%		17.1%		12.0%

Source: ACS 2015-2019

2.5. Special Needs

As noted in Government Code Section 65583(a)(6), within the overall housing needs assessments there are segments of the population that have or require special housing. Generally, these are people who have lower incomes and less access to housing choices when compared to moderate and above moderate income households. Segments of the population that often have special housing needs include seniors, persons with disabilities, large households, single parents, people living in poverty, farm workers, and homeless individuals and families, and military personnel. These groups are summarized in Table 16.

Table 16: Special Needs Groups (2015-2019)

Special Needs Group	# of Persons or Households	# of Owners	% Owner	# of Renters	% Renter	% of Total Households or Population
Senior Headed Households	3,071	1,851	31.3%	1,220	21.3%	26.4%
Seniors Living Alone	1,116	485	8.2%	631	11.0%	9.6%
Large Households (5 and more people)	2,032	1,228	10.6%	804	6.9%	17.5%
Single Parent Households	1,238					10.6%
Persons with Disabilities	7,068					16.2%
Persons with Developmental Disabilities	886					2.0%
Female-Headed Households	3,721					32.0%
Female Headed Households w/ Children	1,072					9.2%
People Living in Poverty	9196					20.9%
Farm Workers	1330					8.5%
Homeless	92					0.2%
Military	14					<0.1%

Sources: American Community Survey 2015-2019

A. Seniors

Seniors, defined as persons over the age of 65 years, often age in-place, living in housing that is too expensive for their fixed incomes or that structurally does not accommodate specific needs for assistance. Even though senior citizens may have difficulty living in their own home, they often do not have the options or mobility afforded other segments of the population.

The number of seniors in El Centro has increased over the last two decades. In 2000, there were 3,529 seniors in the City (see Table 17). By 2019, the 5,874 seniors in El Centro represented 13.3 percent of the population. Between 2000 and 2010, the senior population increased at a rate of 2.9 percent annually; this pace increased to 3.2 percent between 2010 and 2019.

Table 17: Senior Population Trends (65+) (2000-2019)

Year	# of Persons	# Change	% Change	Annual % Change
2000	3,529			
2010	4,556	1,027	29.1%	2.9%
2019	5,874	1,318	28.9%	3.2%

Source: U.S. Bureau of the Census, 2000-2010, ACS 2015-2019

Between 2010 and 2019, the number of senior-headed households in the City increased by 15.6 percent (see Table 18). In 2019, senior-headed households comprised approximately 26.4 percent of all households within the City. Since 1990, the proportion of senior households who owned their homes has slightly declined, while the proportion of senior households who rented their homes has increased (Figure 1). Nevertheless, as of 2019, senior households who owned their homes (60.3 percent) continued to outnumber their renter counterparts (39.7 percent) by 20.6 percent.

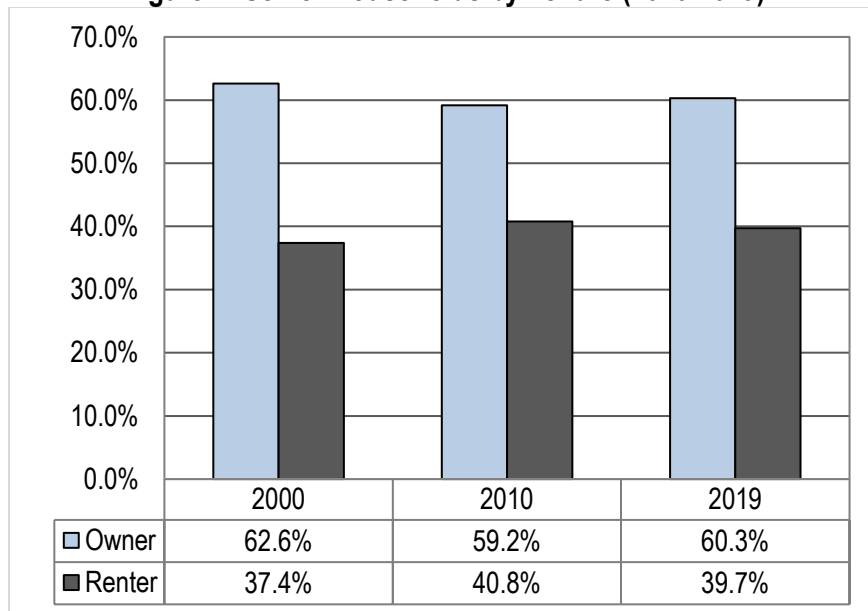
Table 18: Senior Household Trends (65+) (2010-2019)

Year	# of Households	# Change	% Change	Annual % Change
2010	2,657			
2019	3,071	414	15.6%	1.7%

Source: U.S. Bureau of the Census, 2000-2010, ACS 2015-2019

As documented in Table 14, elderly households in the City (particularly those that rented their homes) were especially likely to experience a housing problem. Specifically, of all elderly renter households, around 60 percent reported experiencing a housing problem. Among elderly owner households, approximately 26 percent reported experiencing a housing problem.

Figure 1: Senior Households by Tenure (2010-2019)



Source: U.S. Bureau of the Census, 2000-2010, ACS 2015-2019

Resources

The special needs of seniors can be met through a range of services, including congregate care, rent subsidies, shared housing, and housing rehabilitation assistance. For the frail or disabled elderly, housing can be modified with features that help ensure continued independent living arrangements. Senior housing developments in the City include:

- Regency Park Apartment - 106 units
- El Centro Senior Villas - 72 units
- Plaza Senior Villas (now called Desert Villa Apartments) - 59 units

There are also four Residential Care Facilities for the Elderly in the City:

- A&A Cottage View -14 units
- Heart & Hand - 14 units
- Parkside Villa Assisted Living - 15 units
- Majestic Villa Assisted Living- 18 units

And two Adult Residential Facilities in the City:

- Smoketree - 6 units
- Sunsent Homes - 18 units

Senior residents in the City can benefit from various services offered at the El Centro Adult Center managed by the City's Parks and Recreation Department. Services offered at the Center include: computer and sewing courses, bingo, movie screenings, a senior nutritional program, and adult and senior exercise days. Additionally, several local and regional programs provide housing and social services to assist the elderly in the City. These organizations include the Area Agency on Aging, Imperial County Work Training Center, United Way, and Catholic Charities.

As required by the Lanterman Developmental Disabilities Services Act, the City's Zoning Ordinance treats state-licensed residential care facilities serving six or fewer individuals the same as any other residential use. Furthermore, larger residential care facilities that serve seven or more clients are allowed by-right in the RR, R1, R2, and R3 zones.

B. Persons with Disabilities (Including Developmental Disabilities)

Three types of disabled persons are considered as having special housing needs: physically impaired, mentally disabled, and developmentally disabled. Each type is unique and requires specific attention in terms of access to housing, employment, social services, medical services, and accessibility of housing.

According to 2015-2019 ACS data, approximately 16.2 percent of El Centro residents had a disability. The ACS also tallied the number of disabilities by type for residents with one or more disabilities (see Table 19). Among the disabilities tallied, ambulatory (55.0 percent) and cognitive (34.1 percent) difficulties were the most prevalent. However, the types of disabilities experienced varied depending on the age of the disabled person. Specifically, vision difficulties were the most

common disability affecting disabled person ages 5-7, afflicting 17.3 percent of the disabled persons in this age group. Meanwhile, ambulatory difficulties were the most likely to affect disabled persons over the age of 65.

Persons with disabilities require housing that is adapted to their needs. Most older single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops.

Table 19: Disabilities Tallied (2015- 2019)

Disability Type	% of Disabilities Tallied			
	Age 5 to 17	Age 18 to 64	Age 65+	
With a hearing difficulty	0.6%	9.9%	13.1%	23.6%
With a vision difficulty	1.6%	6.4%	9.3%	17.3%
With a cognitive difficulty		19.1%	15.0%	34.1%
With an ambulatory difficulty		25.8%	29.2%	55.0%
With a self-care difficulty		8.7%	11.6%	20.3%
With an independent living difficulty		16.1%	11.0%	27.1%
Total Disabled Persons 1; 2	630	3,475	2,917	7,022

Notes:

1. A person can have multiple disabilities.
2. Does not include people Age 0-4

Source: Bureau of the Census, American Community Survey (ACS), 2015-2019

Persons with Developmental Disabilities

A recent change in State law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. Section 4512 of the Welfare and Institutions Code defines “a developmental disability as a disability that originates before an individual attains 18 years of age; continues, or can be expected to continue, indefinitely; and constitutes a substantial disability for that individual. This term shall include: intellectual disability, cerebral palsy , epilepsy, autism [and] shall also include disabling conditions found to be closely related to intellectual disability or to require treatment similar to that required for individuals with an intellectual disability, but shall not include other handicapping conditions that are solely physical in nature.” This term shall also reflect the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This generally equates to 654 persons in the City of El Centro with developmental disabilities, based on the 2015-2019 Census population. However, according to the State’s Department of Developmental Services, as of March 2021, approximately 886 El Centro residents with developmental disabilities were being assisted at the San Diego Regional Center for the Developmentally Disabled branch office located in the City of

Imperial. Most of these individuals were residing in a private home with their parent of guardian and 13 of these persons with developmental disabilities were under the age of 18.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

Resources

Various non-profit groups provide supportive services to the special needs population in El Centro, including persons with disabilities. Community Catalysts California has a center located at 354 E. Main Street in El Centro and offers various social services to City residents with the goal of empowering people with disabilities. Among other organizations, ARC of Imperial Valley offers dial-a-ride paratransit services to City residents and links them to additional health, employment, and residential services. The Arc Imperial Valley also operates Group Homes, Independent Living Services, an Adult Development Center, a Behavior Management Program, an Activity Center, a Work Activity Program, Supported Employment and Individual Placement, a Commercial Kitchen and a Recycling Program with a Car Wash. The Arc Imperial Valley is also one of the largest Federal Government contractors in the area through the AbilityOne Program.

According to the State Department of Social Services, six licensed residential care facilities, with a total capacity of 81 beds, are located within El Centro. These facilities have the capability to accommodate and serve persons with disabilities. The Zoning Ordinance treats residential care facilities in accordance with the Lanterman Developmental Disabilities Services Act.

State and federal legislation mandate that a percentage of units in new or substantially rehabilitated multi-family apartment complexes be made accessible to individuals with limited physical mobility.

C. Large Households

For the purposes of this section, large households are defined as households consisting of five or more persons. Generally, the needs of large families are not targeted in the housing market, especially in the multi-family market.

In 2010, 23 percent (or 2,637 households) of the City's households were large households (see Table 11). By 2019, the number of large households in the City had decreased to 2,032 households, or 17.5 percent of all households. Two and three bedroom units are the most common housing unit type in the housing market; however, large households typically require dwelling units with four or more bedrooms in order to avoid overcrowding. According to 2015-2019 ACS data, the majority of owner-occupied housing in the City had three or fewer bedrooms (76.8 percent, occupied by 8,930 households). The proportion of renter-occupied housing with four or more bedrooms was low, at just 6.2 percent, accommodating 356 households.

Housing options for large renter-households in the City are not sufficient to meet the needs of the 804 large renter-households in the ACS (2015-2019). Lower income large renter-households would have difficulty finding adequately sized and affordable housing in El Centro.

Large households are often more susceptible to housing problems, like overcrowding and cost burden. According to CHAS data, 67.4 percent of large-family renter-households and 25.5 percent of large-family owner-households had low incomes (see Table 14). CHAS also found that all (100.0 percent) of the City’s extremely low and 89.4 percent of very low income large renter households experienced at least one housing problem between 2013 and 2017.

Resources

In order to address the problem of overcrowding in large family households, the City has included, as part of this housing element, programs to increase opportunities for the development of suitably sized housing for these households. Large households can benefit from a variety of programs and services offered by different organizations in the City. Providers such as the Center for Family Solutions and House of Hope can aid households in need of emergency shelter and other services. Additional organizations that offer support services such as assistance with utilities, food, and housing referrals include the Imperial County Family Resource Center, Catholic Charities, Imperial Valley Food Bank, Imperial Valley Housing Authority, and the Salvation Army.

D. Single-Parent/Female-Headed Households

Single-person-heads of households, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Female-headed families with children are a particularly vulnerable group because they must balance the needs of their children with work responsibilities, often while earning limited incomes. The 2015-2019 ACS found that there were 3,721 female-headed households in the City of El Centro. As shown in Table 20, of these households, 1,072 households (or 29 percent) had children under 18. Overall, single female-headed households make up 32 percent of all households in the City and single-female headed households with children make up about 9.2 percent of all households in the City.

Table 20: Household Type and Presence of Children 18 Years Old and Under (2015-2019)

Household Type	# of Households	% of Total
Single-Person-Head of Household	6,678	57.4%
With Children Under 18 Years Old	1,238	10.7%
With No Children	5,440	46.8%
Female Householder, No Spouse Present	3,721	32.0%
Female Householder With Children Under 18	1,072	9.2%
Female Householder With No Children Under 18	2,649	22.8%
Total Households	11,625	

Source: ACS 2015-2019

Resources

Various organizations located within El Centro offer family and youth services. The Imperial Valley Food Bank also supports the City’s families through its food distribution and emergency assistance programs. Womanhaven, Inc. offers shelter and a range of services to victims of domestic violence and their children, including counseling, education, advocacy, legal services, support groups, clothing, and case management. The agency also offers children and youth education and violence prevention programs to foster better life choices for the City’s young residents. Organizations offering programs and services beneficial to single-parent households include the Center for Family Solutions, Imperial County Family Resource Center, Catholic Charities, Imperial Valley Food Bank, Neighborhood House, and the Salvation Army.

E. Residents Living Below the Poverty Level

In the City of El Centro, in 2015-2019, an estimated 1,895 families (or 20.9 percent of all families) were living below the poverty level. Poverty thresholds vary depending on the size of the family and the age of family members; therefore, no specific income threshold can be specified. Approximately 50.9 percent (964 families) of the 1,895 family households living below the poverty level were female-headed. Of the female-headed households living below the poverty level, 51.1 percent (492) of households had children under 18 years of age (see Table 21).

Table 21: Households by Poverty Level (2015-2019)

Family Households	# Households	% of Total
Total family households	9,066	100%
Total families with income below poverty level	1,895	20.9%
Total families with children under 18 year of age with incomes in below poverty level	2,557	28.2%
Total female-headed households	2,564	28.3% total family households
Female-headed households below the poverty level	964	37.6% total female-headed households
Female-headed households with children under 18 years of age in below poverty level	492	51.1% female-headed households below the poverty level

Source: Source: American Community Survey (ACS), 2015-2019

Resources

Households within the City living below the poverty level can benefit from programs and services offering assistance with utility bills, food supplies, and various other social services. Organizations in the City offering these services include the Imperial County Family Resource Center, Catholic Charities, Imperial County Social Services, Imperial Valley Food Bank, Neighborhood House, and the Salvation Army. In addition to providing essential support services, the Center for Family Solutions and House of Hope provide emergency shelter to residents. The City promotes the maintenance and expansion of the Housing Choice Voucher program, which provides an important source of rental assistance for individuals and households living in poverty. Individuals living in poverty can also benefit from small units such as studios and single room occupancy units (SROs).

F. Farm Workers

The farm worker population consists of two segments: permanent and migratory (seasonal) farm workers. The permanent population consists of farm workers who have settled in the region and maintain local residence and who are employed most of the year. The migratory farm worker population consists of those farm workers who typically migrate to the region during seasonal periods in search of farm labor employment and from the region during the off-season. Traditional sources of population estimates, including the Census, have tended to significantly underestimate farm worker population. This conclusion is based upon subsequent farm worker data that conflicts with prior data. Moreover, different employment estimation techniques result in diverse estimates of local agricultural employment. The USDA’s 2017 Census of Agriculture reported that in Imperial County, 7,934 persons were hired farmworkers (fulltime), with 4,634 working more than 150 days and 3,300 working less than 150 days. Imperial County’s migrant farmworker population was 1,057.

According to 2015-2019 ACS data, shown in Table 22, 8.5 percent (1,330 persons) of the City’s labor force was employed in the farming, fishing and forestry industries. The proportion of El Centro’s labor force employed in agriculture is one percent lower than for the County (9.5 percent).

Table 22: Farm workers (2000-2019)

Industry	City of El Centro				Imperial County	
	2000		2019		2019	
	#	% of Total Employment	#	% of Total Employment	#	% of Total Employment
Farming, Fishing and Forestry	966	6.3%	1,330	8.5%	5,728	9.5%
Total Labor Force	18,219		18,067		70,423	

Source: U.S. Bureau of the Census, 2000; American Community Survey (ACS), 2015-2019

Farmers are at very high risk for fatal and nonfatal injuries. Additionally, farming is one of the few industries in which family members (who often share the work and live on the premises) are also at risk for fatal and nonfatal injuries. While no data specific for El Centro was available at the time of writing, a study published in the Journal of Agricultural Health and Safety found that the disability rate in the farm population was 12.9 percent based on U.S. Census Bureau’s American Community Survey (ACS) from 2008 to 2016.⁴ On average, nearly one out of ten farmworkers had a disability and one in 25 farm family children (ages 6 to 17) and slightly more than two in 25 farm family adults had a disability. The high risk of injury and disability has implications in the planning of housing for farmworkers and their families- both in terms of affordability and housing type needs.

Resources

Farmworker can benefit from programs for lower income households. The City also has a number of apartment complexes suitable for those in need of affordable housing (see Table 30).

⁴ Miller, Cristina & Aherin, Robert. (2018). The Prevalence of Disabilities in the U.S. Farm Population. Journal of Agricultural Safety and Health. 24. 243-260. 10.13031/jash.12934.

G. Homeless Persons

The City of El Centro, with the assistance and participation of its local service providers, maintains a continuum of care for the homeless population and to those facing the possibility of homelessness. The continuum of care begins with the assessment of the homeless individual or family; then refers to appropriate housing where supportive services are provided to prepare them for independent living. The goal of a comprehensive homeless service system is to ensure that homeless individuals and families move from homelessness to self-sufficiency, permanent housing, and independent living.

Due to their transient nature, it is difficult to count the number of homeless in any one area. It should also be noted that there are generally two types of homeless - the permanent homeless, who are the transient and most visible homeless population, and the temporary homeless, who are homeless usually due to eviction and may stay with friends, family, at a shelter or motel until they can find a permanent residence.

The City of El Centro works with other county departments, mental health providers, homeless and transitional shelters, local jurisdictions and other service providers to identify the needs of the homeless, which have been identified in the Imperial Valley Continuum of Care (CoC) 2020 Homeless Point-in-Time Survey conducted on January 24-25, 2020. This updated count presents the most current data for the region. The Point-in-Time Survey reported that on a given day, there are 1,527 homeless in the County of Imperial. This includes 1,334 unsheltered and 193 sheltered homeless people. The exact population of those who are homeless within the City is difficult to estimate because of the transient nature of the homeless population.

Proportionally, El Centro's population represents about 24 percent of the countywide population. Therefore, it can be generally estimated that 322 unsheltered homeless persons in El Centro. Given the basis of the calculation, the emergency need conditions and the transient nature of homeless people, these numbers will continue to fluctuate. This estimate is congruent with the most recent Point-In-Time (PIT) count that reported the number of homeless by community/jurisdiction. According to the 2018 PIT report, El Centro's homeless population was estimated account for 20.4 percent of the County's homeless population, the largest homeless population in the County outside of Slab City.

Slab City is a World War II era U.S. Marine Corp training center formerly known as Camp Dunlap. In 1956, Camp Dunlap was determined to be no longer required by the Department of Defense. In October of 1961 and was given to the State of California by quitclaim deed. All of the former Camp Dunlap buildings were removed and all that remained were the concrete slabs used for the building foundations. Many began camping at the slabs and they continued to come and camp and many never left, even though there is no running water, sewage, electricity or garbage collection. In 2017, Imperial Valley began to include Slab City's homeless population in its PIT counts. According to 2018's PIT report (the last report to include data by community/jurisdictions), Slab City had the largest share of the County's total homeless population. Homeless persons in Slab City include families with children, adults, transition-age youth, veterans, seniors, and all other subsets and demographics. Virtually all homeless persons in Slab City occupy vehicles, hand-built structures, or other makeshift accommodations. The report states that "homelessness in Slab City is unlike the type of homelessness most prevalent

nationwide in urban and rural communities insofar as residents of the area are a more-or-less settled population, living in some cases for years on claimed lots with semi-permanent installations... a subset of Slab City residents denies being homeless, preferring instead to be defined as 'living off the grid' or some other alternative term." In 2018, Slab City had the most homeless residents receiving Social Security, Veteran's Assistance, Food Stamps, and disability income in the County. Slab City is located about 40 miles north of El Centro so its homeless population is not likely to have any effect on the needs and services provided in El Centro.

The 2018 PIT detailed that El Centro's homeless population included a majority of unsheltered individuals with no makeshift accommodation of any type, unlike most other communities in the PIT count. El Centro's homeless population cited Temporary Assistance for Needy Families (TANF), Food Stamps, and cash aid as their primary sources of supplementary income. The majority of El Centro's homeless residents were 40 years old or younger while the majority of Slab City's were 41 and older.

Though PIT Survey Reports after 2018 have not reported data by community, the data provided by the 2020 PIT count is still useful in identifying Countywide trends in the homeless population. The 2020 Point-in-Time Survey reported the following about the homeless in Imperial County:

- There are 92 homeless children under the age of 18, of which 38 are sheltered while 54 are unsheltered.
- The largest subpopulation of unsheltered homeless are male; there is a total of 1,085 homeless males of which 965 are unsheltered.
- There are 750 chronically homeless individuals on any given day in Imperial County.

In Imperial County, 87 percent of those experiencing homeless are unsheltered. Factors contributing to homelessness include the lack of housing affordable to lower income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, alcohol and substance abuse, domestic violence, and the de-institutionalization of the mentally ill. Homeless people, victims of abuse, and other individuals often have housing needs that are not being met by the traditional housing stock. These people require temporary housing and assistance at little or no cost to the recipient.

Resources

The City amended the Zoning Ordinance in 2010 to allow emergency shelters by-right and with a ministerial permit process in the R3, CG, and CH zones and in April 2013 to allow transitional and supportive housing by-right in all zones that allow residential uses, pursuant to State law. Additionally, as documented in Table 23, a number of organizations located within El Centro offer emergency shelter, transitional housing and supportive services to the region's homeless or those at risk of becoming homeless.

Table 23: Homeless Resources in El Centro

Organization	Services
Catholic Charities/House of Hope	Emergency Shelter, Supportive Services
Employment Development Department	Supportive Services
House of Hope	Emergency Shelter, Supportive Services
Spread the Love Charity	Transitional Housing
VCS – Community Catalyst	Transitional Housing
Imperial County Health Department	Supportive Services
Imperial County Social Services	Supportive Services
Imperial Valley Behavioral Health Services	Supportive Services
Imperial Valley Food Bank	Supportive Services
Imperial Valley College	Supportive Services
I.V. Independent Living Center (Empowering People with Disabilities)	Supportive Services
Salvation Army	Supportive Services
IVROP	Supportive Services
IVROP Foster Youth Services	Supportive Services
Womanhaven (d.b.a. Center for Family Solutions)	Emergency Shelter, Supportive Services, Transitional Housing

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

H. Military Households

The military population’s influence on the demand for housing takes two forms: (1) existing military households trying to find housing; and (2) former military households trying to remain in the community. Often, the housing needs of military personnel are affected by lower incomes and an uncertain length of residency.

While the 2015-2019 ACS documented only 14 persons in the City employed in the Armed Forces, a far greater number of military personnel may actually be present in the City at any given time. Naval Air Facility (NAF) El Centro is a short-term training facility for 1,600 members of the military at a time located about five miles from the City and base. There are also approximately 280 other full time military personnel working at NAF who are not included in the City’s ACS employment estimates.

Resources

Most special needs of military families are provided through on-base supportive programs and services. NAF El Centro has established Community Support Programs (CSP) (Fleet and Family Support or FFS), a regional team responsible for policy development, resourcing and oversight of quality of life programs for active-duty military, reservists, military retirees and their families. FFS provides housing, morale/welfare/recreation, and family programs and services for military personnel and their families.

I. Extremely Low Income Households

The category “extremely low-income households” is a subset of “very low-income households,” and is defined as 30 percent (or less) of the area median income. The housing element must quantify existing and projected extremely low-income households, analyze their housing needs, and assess the kind of housing available and suitable for extremely low-income households. Table 14 in the Housing Problems section of this assessment showed the disproportionate needs of ELI households compared to other lower income households and all households in the City. About 84 percent of all ELI households experience housing problems compared to 83 percent of very low income households, 54 percent low income households, and 45 percent of all households. ELI households also experience housing cost burdens at higher rates (79 percent) than all other households (74 percent VLI, 45 percent low income, and 38 percent of all households). ELI households also have high rates of overcrowding, compared to all households, but lower than VLI households (Table 24). ELI income renters are also more likely to live in overcrowded conditions than owners. However, all lower income renter households experience similarly high overcrowding rates (over 18 percent) compared to only nine percent of moderate and above moderate income households. Based on this analysis, ELI households are disproportionately affected by cost burdens and crowded conditions. Thus, affordable housing opportunities in units of various sizes are necessary to meet the needs of ELI residents in the City.

Table 24: Overcrowded Households by Income Level and Tenure

Income Level	Owners	Renters	All Households
Extremely Low Income (<30%AMI)	12.6%	18.2%	16.9%
Very Low Income	18.6%	20.8%	20.3%
Low Income	6.0%	21.8%	14.4%
Moderate & Above Income (>80% AMI)	5.6%	8.5%	6.5%
Total Households	7.1%	16.3%	11.7%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) tabulations of 2013-2017 ACS data

Resources

Extremely low-income households can also be any of the aforementioned special needs populations and can thus take advantage of the resources listed in the previous sections. In addition, the City will rely on the non-funding-related actions to encourage affordable and special needs housing production, including housing for extremely low income households, as detailed in Program 5.

2.6. Housing Stock Characteristics

The Census defines a housing unit as any of the following: a house, an apartment, a mobile home or trailer, a group of homes, or a single room intended for use as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building, and which have direct access from outside the building or through a common hall.

This section discusses various housing characteristics and trends that affect housing needs in El Centro. Important characteristics include housing growth, type, vacancy, and age and condition.

A. Housing Unit Growth

Perhaps due to the housing crisis of the late 2000s, the number housing units in the County increased from 2000-2010 (by 27.5 percent) and then only increase by 4.9 percent)in the decade that followed. This trend is amplified in El Centro, where there was a 17.5percent growth in the number of housing units between 2000 and 2010, followed by an increase of only 2.5 percent between 2010 and 2021 (see Table 25).

Table 25: Housing Unit Growth (2000-2021)

Jurisdiction	2000	2010	2021	% Change	
				2000-2010	2010-2019
Brawley	7,038	8,231	8,634	17.0%	4.9%
Calexico	6,983	10,651	10,999	52.5%	3.3%
Calipatria	961	1,121	1,122	16.6%	0.1%
El Centro	12,323	14,476	14,832	17.5%	2.5%
Holtville	1,617	1,937	1,982	19.8%	2.3%
Imperial	2,385	4,751	6,423	99.2%	35.2%
Imperial County	43,981	56,067	58,811	27.5%	4.9%

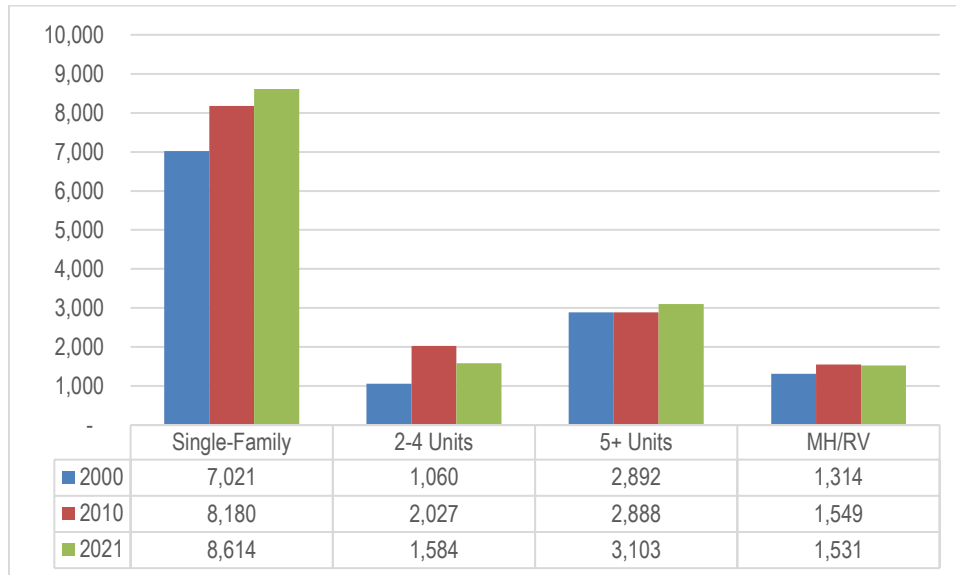
Sources: U.S. Bureau of the Census, 2000, ACS 2006-2010; 2010 and 2021 California Department of Finance Population and Housing Estimates.

B. Housing Type

Housing diversity is important for ensuring adequate housing opportunities for El Centro residents. A diverse housing stock helps ensure that all households, regardless of their income, age group, and/or household size, have the opportunity to find housing that is best suited to their needs.

According to the 2021 State Department of Finance Population and Housing Estimates, there were approximately 8,614 single-family residences located within the City, an increase of 5 percent since 2010 (see Figure 2). The City’s housing stock also includes 4,687 multi-family housing units. Since 2010 the number of multi-family units decreased by 5 percent overall. Meanwhile, the number of mobile homes, boats, RV’s, vans, etc. in the City also decreased by 1 percent.

Figure 2: Distribution of Housing Units (2000-2010-2019)



Sources: U.S. Bureau of the Census, 2000; American Community Survey (ACS), 2006-2010; and 2021 DOF Population and Housing Estimates

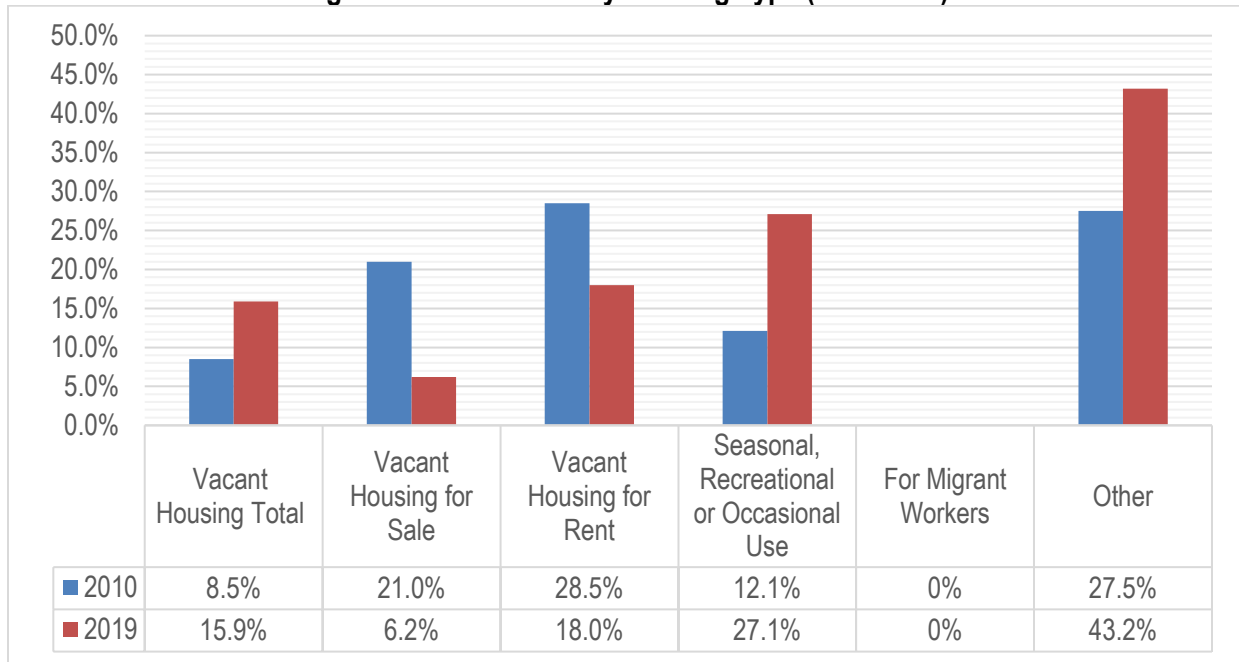
C. Housing Vacancy

Vacancy rates are important indicators of the supply and cost of housing because they establish the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, then the vacancy rate is low and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the City has an adequate housing supply to provide choice and mobility. General industry standards indicate that vacancy rates of five to six percent for rental housing and one to two percent of ownership housing is sufficient to provide choice and mobility.

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

In both 2010 and 2019, the percentage of vacant rental units greatly exceeded the percentage of units for sale. Of the vacant units in the City in 2019, 6.2 percent were available for sale while 18 percent were available for rent. In 2010, there was a much higher percentage of both vacant housing for sale (21 percent) and vacant housing for rent (28.5 percent). A much large proportion of vacant units are being used for seasonal, recreational or occasional use in 2019 than in 2010.

Figure 3: Vacant Units by Housing Type (2010-2019)



Source: American Community Survey (ACS), 2006-2010, ACS 2015-2019

D. Housing Age and Condition

Housing age can be an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs.

Generally, housing older than 30 years of age will require minor repairs and modernization improvements. Housing units over 50 years of age are more likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Approximately 33 percent of the housing stock is over 50 years of age and may require substantial repairs.

Table 26 shows that 50.7 percent of the housing units in El Centro were built prior to 1980, meaning that more than one-half of the City’s housing stock is over 30 years old. Many of these older units could potentially require minor repairs.

Housing age is only a general indicator. It does not take into account private actions by property owners to maintain and upgrade their properties. In May of 2015, a comprehensive Housing

Table 26: Housing Age

Year Structure Built	Number	Percent of Total
1939 or earlier	433	3.4%
1940-1959	2,542	18.4%
1960-1969	1,549	11.2%
1970-1979	2,463	17.7%
1980-1989	2,343	17.0%
1990-1999	1,865	13.4%
2000-2009	2,315	16.7%
Built 2010 or later	312	2.2%
Total	13,822	100.0%

Source: American Community Survey (ACS), 2015-2019

Conditions Survey was conducted to estimate the total number of substandard units (e.g., those in need of rehabilitation/repair) and those in need of replacement/ demolition. This is based upon the California Department of Housing and Community Development's (HCD) - Housing Stock Characteristics definition:

Government Code Section 65583(a) requires an analysis and documentation of household characteristics, including level of payment compared to ability to pay housing characteristics, including overcrowding, and housing stock condition, [Section 65583(a)(2)].

In conducting a Housing Conditions Survey, compliant with the regulations set forth through the above referenced Government Code; the City conducted a representative sample survey, physically inspecting 2,180 of the units within the City boundary. As part of the 14,225 units constructed in the City approximately 13,908 are estimated to be occupied. Based upon construction timeframes and the age of units across the City, 10,461 units were identified as High Priority parcels. A High Priority parcel was defined as being located in an area of a high Rehab score (e.g., a score of 40 or more based upon the 2008 survey). During the survey, each residential housing unit was scored on a range of structural condition from "Good Condition" to "Repair Needed" to "Partial Replacement" to "Complete Replacement". Each unit was provided a total Rehab Score that is identified below:

- **Sound** - 9 or less points; no repairs needed, or only one minor repair needed, such as exterior painting or window repair.
- **Minor** - 10 to 15 points; one or two repairs needed, or only one minor repair needed, such as patching and painting of siding or re-roofing or window replacement.
- **Moderate** - 16 to 39 points; two or three minor repairs needed, such as those listed above.
- **Substantial** - 40 to 55 points; repairs needed to at least four of the five surveyed items (foundation, roof, siding/stucco, windows, and/or electrical)
- **Dilapidated** - 56 or more points; the cost of repairs would exceed the cost to replace the residential structure.

According to the 2015 survey data, the majority of units are classified as "Sound" (39 percent) or in need of "Minor" (47 percent) repair, which indicates a relatively healthy housing stock within the City. Approximately 12 percent of units were in need of moderate repairs. Only 0.9 percent of the units surveyed needed substantial repair, and less than one percent of housing units (0.3 percent) were dilapidated. Housing conditions in the City have not changed significantly since this survey was conducted. In summary, the survey showed that a majority housing units are in good condition and not in need of moderate to major repairs. Only 13 percent of units were estimated as classified as needing moderate or substantial repairs. As a proportion of the City's 14,832 units in 2021, this equates about 1,920 units. Less than one percent of units (42 units) are estimated to need complete replacement.

As the majority of units surveyed are single-unit, as well as the majority of units in the City, it is anticipated the greatest need to be derived from the Single-Family Unit classification along with their corresponding need for repairs. The single-most common repair identified was that of window replacement, as it was also identified in the 2008 Housing Conditions Survey. This indicates that even though the housing stock in El Centro has grown, a corresponding level of deterioration has not been identified.

The survey also identified specific areas where poor housing conditions predominate, with greater than 60 percent of the units in need of some rehabilitation. These areas were located in the central, northern and western central portions of the City, where housing in need of rehabilitation was found to have the highest densities. The areas and their corresponding rehabilitation needs include:

- Area bounded by Wensley Ave on the south, Brighton Ave on the north, the Southern Pacific Railroad tracks on the east, and Waterman on the west (over 60 percent require rehabilitation).
- Area bounded by Bradshaw Drive on the north, the Date Canal on the South, the Southern Pacific tracks to the east.

Additional areas of the City were identified where slightly fewer (50 to 60 percent), of the housing units require some form of rehabilitation. These include:

- Area bounded by Main Street on the north, Dogwood Rd on the east, Hamilton Avenues on the south, and 2nd Street on the west.

Additional areas of the City were identified where 40 to 50 percent, of the housing units require some form of rehabilitation. These include:

- Area bounded by Ross Avenue on the south, Holt Avenue to the north, 4th St. to the east and 8th Street to the west.
- Area bounded by the Interstate 8 to the south, 5th Street to the east, Aurora Drive to the north, and 8th Street to the west.
- Area bounded by Ross Avenue on the south, Hamilton Avenue to the north, Imperial to the east and La Brucherie Avenue to the west.

2.7. Housing Cost and Affordability

One of the major barriers to housing availability is the cost of housing. In order to provide housing to all economic levels in the community, a wide variety of housing opportunities at various prices should be made available.

A. Ownership Housing

As shown in Table 27, the median home price in El Centro decreased slightly, by 0.4 percent, from \$123,500 in 2011 to \$123,000 in 2012, when the Housing Element was last updated and also when the housing market was showing signs of recovery from the recession. Therefore, the median price increased significantly, to \$299,500, or 143.5 percent, from 2012 to 2021. During this same time period, changes to median home prices in small neighboring jurisdictions were also significant. Calipatria had a large (206.7 percent) increase in median price. The largest increase occurred in the City of Holtville (249.7 percent) while the smallest increase was in Brawley (82.1 percent). The County's median home price decreased by 0.8 percent between 2011 and 2012. After

2012, when home prices in the region were generally stagnant, the housing market in the cities of Imperial County experienced growth of around 16 percent a year.

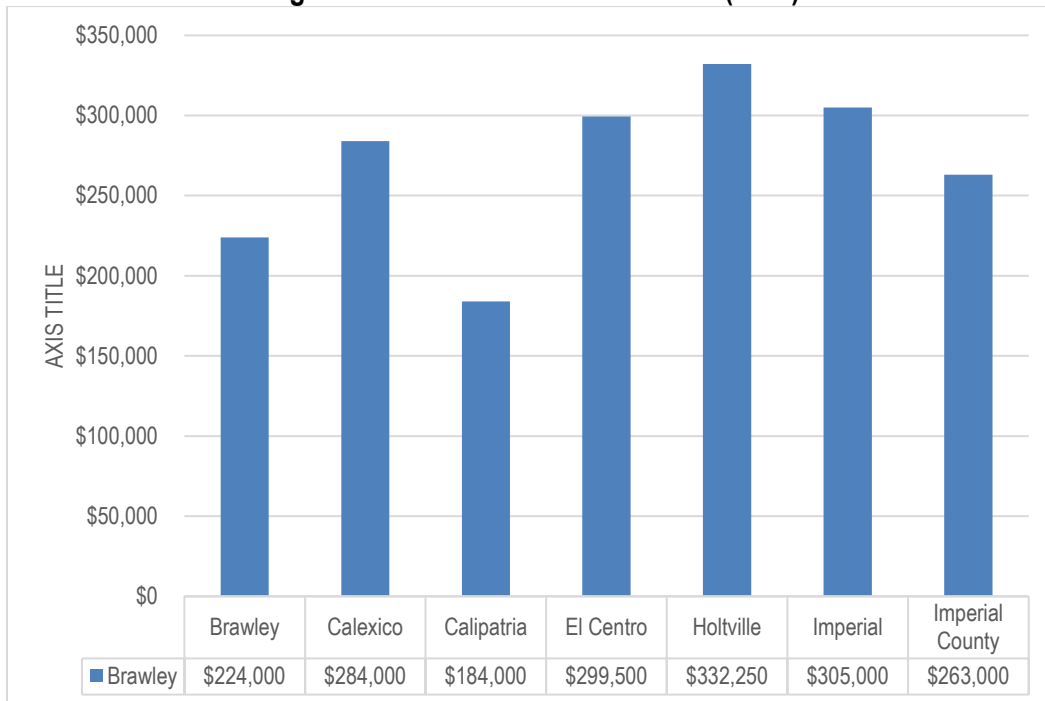
Table 27: Changes in Median Home Sale Prices (2011-2021)

Jurisdiction	2011	2012		2021		Percent Change in Median Sale Price	
	Median Price	# Sold	Median Price	# Sold	Median Price	2011-2012	2012-2021
Brawley	\$125,000	234	\$123,000	23	\$224,000	1.6%	82.1%
Calexico	\$135,000	302	\$137,000	14	\$284,000	1.5%	107.3%
Calipatria	\$72,000	26	\$60,000	4	\$184,000	-16.7%	206.7%
El Centro	\$123,500	391	\$123,000	25	\$299,500	-0.4%	143.5%
Holtville	\$95,000	45	\$95,000	3	\$332,250	0.0%	249.7%
Imperial	\$160,000	351	\$159,000	34	\$305,000	-0.3%	91.8%
Imperial County	\$131,000	1,616	\$130,000	132	\$263,000	-0.8%	102.3%

Source: CoreLogic, 2021.

Figure 4 compares median home prices in El Centro with home prices in neighboring jurisdictions during November 2021. El Centro had among the third highest median home prices among five neighboring jurisdictions. The median price of homes in the City was also \$36,500 above the median price of homes in Imperial County.

Figure 4: Median Home Sales Prices (2021)



Source: CoreLogic 2021

B. Rental Housing

According to a survey of rental listings on www.Craigslist.org and Zillow.com, the median rent in the City of El Centro was \$1065 (see Table 28). Market rents in the City averaged approximately \$1124, and ranged from \$575 for a one-bedroom to \$2,300 for a three-bedroom unit.

Table 28: Median and Average Rents by Number of Bedrooms (2021)

# of Bedrooms	# Listed	Median Rent	Average Rent	Rent Range
0	1	\$630	\$630	\$630 to \$630
1	13	\$840	\$950	\$575 to \$1,150
2	4	\$1,290	\$1,300	\$900 to \$2,055
3	4	\$1,650	\$1,500	\$1,000 to \$2,300
4	0			
5+	0			
Total	22	\$1,065	\$1,124	\$630 to \$2,300

Source: Craigslist.org, and Zillow, June 2, 2021 and July 1, 2021

C. Housing Affordability by Income

Housing affordability can be inferred by comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment.

Housing affordability is an important indicator of quality of life in El Centro. If residents pay too much for housing they will not have sufficient income for other necessities such as health care. Households that spend a substantial portion of their income on housing may also be at risk of becoming homeless in the event of unexpected circumstances such as illness or loss of employment. State law requires that the City facilitate provision of housing opportunities that are affordable to all economic segments of the community.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Based on this survey, the California Department of Housing and Community Development (HCD) developed income limits that can be used to determine the maximum price that could be affordable to households in the upper range of their respective income category. Households in the lower end of each category can afford less by comparison than those at the upper end.

Based on these income limits for Imperial County and current real estate prices documented in Table 27, homeownership in El Centro is within the reach of low to moderate income households, with the exception of single-person low income households. Housing options for extremely low and very low income households are virtually non-existent unless public assistance is involved.

As shown in Table 29, moderate and median income households can generally afford the market rents for apartments in El Centro. Low income households in El Centro may be able to rent

housing in the City depending on household size; however, competition for appropriately sized rental homes may lead to a housing cost burden or overcrowding.

To afford the median-priced home of \$299,500 in 2019, a household income of approximately \$74,875 would be needed; more than that of the median-income for a four-person household in El Centro of \$70,700 (see Table 29). Renting an average apartment, at \$1124 per month, would require an annual income of approximately \$54,829, an amount barely within reach of a median-income four-person household in the County. The approximately half of City residents with higher income occupations could afford to rent housing based on these estimates, while ownership would be out of reach for most households. Lower wage occupations would struggle to find any affordable housing in the City.

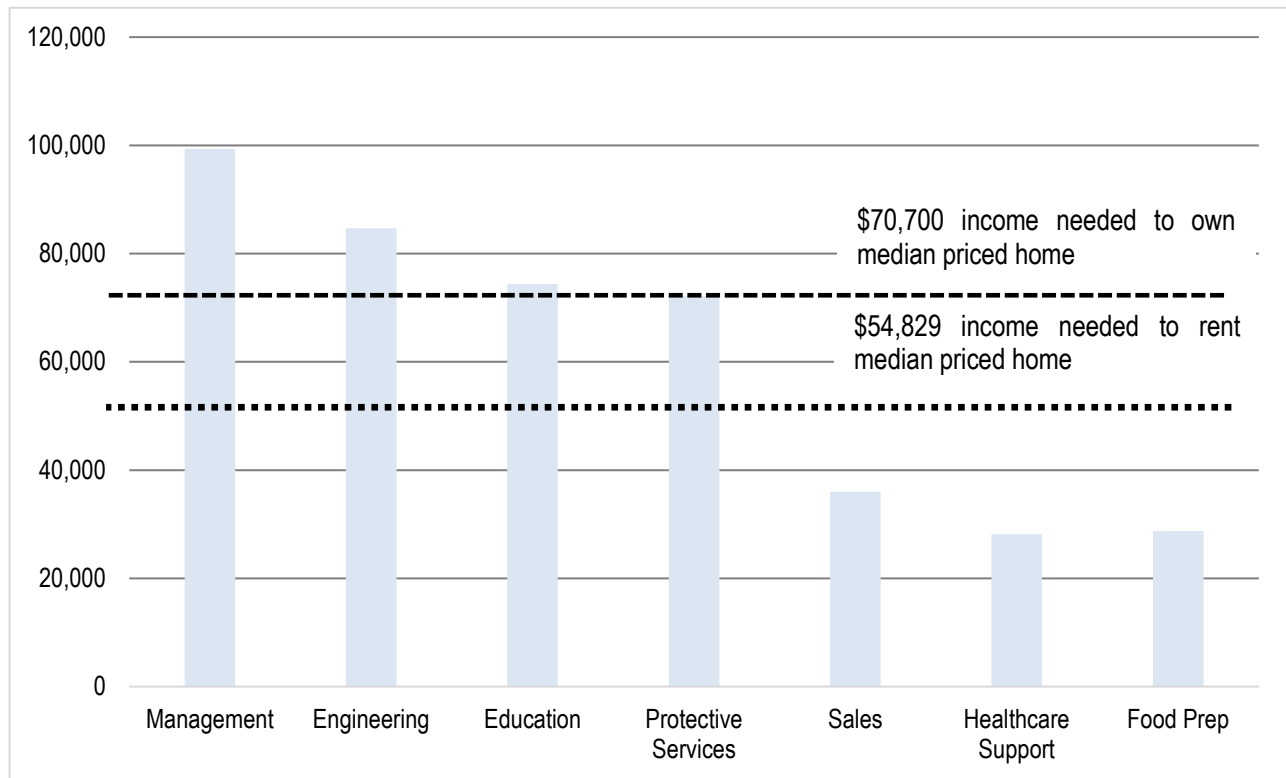
The price of homes has increased approximately 16 percent a year since 2012, which saw the tapering of the housing crisis at the end of the prior decade. In addition to high costs, tight credit markets and high down-payment requirements may also have forced otherwise income-qualified households out of the ownership market. This, in turn, could have created higher demand for rental properties with associated rental price increases. Furthermore, a general shortage of ownership housing options may explain higher relative housing costs when compared to rental housing.

Table 29: Affordable Housing Costs by Household Size and Tenure (2021)

Household	Annual Income	Affordable Costs (All Costs)		Utility Allowance, Taxes & Insurance		Affordable Rent	Affordable Home Price
		Rental Costs	Ownership Costs	Renters	Owners		
Extremely Low Income (0-30% AMI)							
1-Person	\$14,700	\$368	\$368	\$163	\$292	\$204	\$19,935
2-Person	\$17,420	\$436	\$436	\$177	\$329	\$259	\$28,034
3-Person	\$21,960	\$549	\$549	\$202	\$394	\$347	\$40,753
4-Person	\$26,500	\$663	\$663	\$228	\$460	\$435	\$53,401
5-Person	\$31,040	\$776	\$776	\$257	\$529	\$519	\$65,170
Very Low Income (31-50% AMI)							
1-Person	\$24,500	\$613	\$613	\$163	\$378	\$449	\$61,904
2-Person	\$28,000	\$700	\$700	\$177	\$422	\$523	\$73,344
3-Person	\$31,500	\$788	\$788	\$202	\$478	\$585	\$81,609
4-Person	\$34,950	\$874	\$874	\$228	\$534	\$646	\$89,588
5-Person	\$37,750	\$944	\$944	\$257	\$587	\$687	\$93,906
Low Income (51-80% AMI)							
1-Person	\$39,150	\$979	\$979	\$163	\$506	\$816	\$124,644
2-Person	\$44,750	\$1,119	\$1,119	\$177	\$568	\$942	\$145,078
3-Person	\$50,350	\$1,259	\$1,259	\$202	\$643	\$1,057	\$162,335
4-Person	\$55,900	\$1,398	\$1,398	\$228	\$717	\$1,170	\$179,309
5-Person	\$60,400	\$1,510	\$1,510	\$257	\$786	\$1,253	\$190,907
Median Income (80-100% AMI)							
1-Person	\$49,500	\$1,238	\$1,238	\$163	\$596	\$1,074	\$168,969
2-Person	\$56,550	\$1,414	\$1,414	\$177	\$672	\$1,237	\$195,612
3-Person	\$63,650	\$1,591	\$1,591	\$202	\$759	\$1,389	\$219,294
4-Person	\$70,700	\$1,768	\$1,768	\$228	\$847	\$1,540	\$242,691
5-Person	\$76,350	\$1,909	\$1,909	\$257	\$925	\$1,652	\$259,214
Moderate Income (100-120% AMI)							
1-Person	\$59,400	\$1,485	\$1,485	\$163	\$683	\$1,322	\$211,366
2-Person	\$67,900	\$1,698	\$1,698	\$177	\$771	\$1,521	\$244,219
3-Person	\$76,350	\$1,909	\$1,909	\$202	\$870	\$1,707	\$273,683
4-Person	\$84,850	\$2,121	\$2,121	\$228	\$970	\$1,893	\$303,289
5-Person	\$91,650	\$2,291	\$2,291	\$257	\$1,059	\$2,034	\$324,738

Source: California Department of Housing and Community Development, 2021 Income limits; and Veronica Tam and Associates
 Assumptions: 2021 HCD income limits; 30% gross household income as affordable housing cost; 35% of monthly affordable cost for taxes and insurance; 10% downpayment; and 3.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Imperial Valley Housing Authority Utility Allowance, 2019. For heating, cooking, and water heating utilities, for which multiple energy sources are available, the average for all energy sources was averaged.

Figure 5: Income Needed to Afford Housing Compared to Wages



Sources:

1. Average salary data State Employment Development Department, 2020
 2. California Department of Housing and Community Development, 2021 Income limits; and Veronica Tam and Associates
- Assumptions: 2021 HCD income limits; 30% gross household income as affordable housing cost; 35% of monthly affordable cost for taxes and insurance; 10% downpayment; and 3.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Imperial Valley Housing Authority Utility Allowance, 2019. For heating, cooking, and water heating utilities, for which multiple energy sources are available, the average for all energy sources was averaged.

2.8. Affordable Housing

State law requires the City to identify, analyze, and propose programs to preserve existing multi-family rental units that are currently restricted to lower income housing use and that will become unrestricted and possibly be lost as lower income housing (i.e., “units at risk” or “at-risk units”).

The following discussion satisfies the first three requirements of State law listed above pertaining to the potential conversion of assisted housing units into market rate housing for the ten-year period between October 15, 2021 and October 15, 2031. The Housing Plan section includes a program for preserving the at-risk units, which meets the final requirement of State law.

A. Inventory of At-Risk Rental Housing Units

Table 30 includes the inventory of assisted housing developments within the City of El Centro as of June 2021. The inventory includes 872 assisted units in deed-restricted affordable housing developments. Most of the properties and units are owned by the Imperial Valley Housing Authority.

Table 30: Assisted Housing In El Centro (2021)

Development	Location	Ownership Type	# Assisted Units	Expiration Date
Non At-Risk				
Fairfield Homes	Hope, Holt, Heil & 1 st	IVHA	50	Perpetuity
Green Gables	Park Avenue	IVHA	19	Perpetuity
Imperialwood Homes	Holt & Heil	IVHA	32	Perpetuity
Turnkey Units	680 Brighton	IVHA	6	Perpetuity
Turnkey Units	580 Brighton	IVHA	6	Perpetuity
Turnkey Units	Commercial & Brighton	IVHA	7	Perpetuity
Turnkey Units	Barbara Worth Drive	IVHA	9	Perpetuity
El Centro Homes	300 Block of Holt & 400 Block of Hamilton	IVHA	21	Perpetuity
Casa de Anza	1690 W. Adams	IVHA	36	Perpetuity
Tierra del Sol	1720 W. Adams	IVHA	40	Perpetuity
El Centro Family Homes	6 th & Adams	IVHA	8	Perpetuity
Cedar Homes Senior	650 Adams	IVHA	19	Perpetuity
Boatwright Homes Senior	590 Holt Ave	IVHA	20	Perpetuity
Valley Apartments I, II, III & IV	970 Waterman Court	IVHA	105	Perpetuity
Casa de Pajas	402 Adams	IVHA	3	Perpetuity
El Centro Senior Villas	515 Park Avenue	LIHTC	80	2032
Countryside Apartments	1751 Adams Avenue	LIHTC	72	2034
Plaza Senior Apartments	1755 W. Main Street	LIHTC	171	2035
Imperial Gardens Family Apartments	1798 W. Main Street	LIHTC	76	2064
Las Brisas Apartments	2001 N. 8 th St	LIHTC	72	2064
El Centro Senior Villas II	579 Park Ave	LIHTC	20	2067
Total Non At-Risk Units			872	
At-Risk				
Euclid Villas	1735 W Euclid Ave	Profit Motivated – Section 8	42	June 30, 2023
Total At-Risk Units			42	
Total Housing Stock Within the City of El Centro			42	

Source: HUD, 2021. Publichousing.com

B. Preservation of At-Risk Housing Units

State Housing Element law requires the analysis of government-subsidized housing that may change from low-income housing to market-rate housing during the next ten years. Thus, this at-risk housing analysis covers the period from October 15, 2021 through October 15, 2031. This section evaluates affordable housing in El Centro that may be at-risk of converting to market rates and the estimated costs to preserve or replace the at-risk units.

Within the 2021-2031 “at-risk” housing analysis period, one of the City’s affordable housing projects is considered at low risk of being converted to market rate because the owners have continued to renew their HUD Section 8 contracts. While the HUD renewal process is periodic, the approval is fairly automatic. Though unlikely, it is possible 42 of the City’s affordable housing units could convert to market-rate at some point in the planning period.

According to California Government Code, owners of specified, federally assisted projects are required, unless exempted, to provide "notices of intent" to prepay a federally assisted mortgage, terminate mortgage insurance, or terminate rent subsidies or restrictions at twelve and six months to all affected households and to affected public agencies. However, recent changes in State law requires that the tenants are notified three years, one year, and six months before opting out of low income use restrictions.

Affected public agencies include the city or county where the development is located, the local public housing authority, and the California Department of Housing and Community Development (HCD). Owners of government-assisted developments cannot terminate subsidy contracts, prepay a federally assisted mortgage, or discontinue use restrictions without first providing an exclusive "notice of opportunity to submit an offer to purchase" to each identified qualified entity. The notices to qualified entities⁵ must be made by registered or certified mail, return receipt requested. The owner shall also post a copy of the notice in a conspicuous place in the common area of the development.

Preservation Options

Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to non-profit ownership; and 2) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units. The following discussion highlights ways that the City’s at-risk project could be preserved as affordable housing. All of the presented alternatives are costly and beyond the ability of the City of El Centro to manage without large amounts of subsidy from federal and/or State resources. These options are described below.

⁵ List of current Qualified Entities is maintained and updated by HCD and is subject to change. - <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>.

Transfer of Ownership

One preservation option is to transfer the ownership of the at-risk units to a nonprofit organization or purchase similar units by a nonprofit organization. This option is applicable to the Euclid Villas Apartments, as it is a for-profit housing project. By transferring property ownership to a non-profit organization, low income restrictions can be secure and the project would become potentially eligible for a greater range of governmental assistance. The cost of transferring ownership depends on a number of factors, including the market conditions at the time, occupancy rate, and physical conditions of the building and units. The estimated market value for the for-profit units at risk is provided in Table 31.

Current market value for the at-risk units is estimated on the basis of the units' potential annual income, and operating and maintenance expenses. As indicated, the estimated market value of El Centro's current stock of at-risk affordable housing is \$5.3 million. This estimate is provided for the purpose of comparison and understanding the magnitude of costs involved and does not represent the precise market value of this project. The actual market value at time of sale would depend on market and property conditions, lease-out/turnover rates, among other factors.

Table 31: Market Value of At-Risk Housing Units

Unit Information	Total
Two-Bedroom Units	14
Three-Bedroom Units	28
Annual Operating Cost	\$204,750
Gross Annual Income	\$630,100.80
Net Annual Income	\$425,350.80
Market Value	\$5,316,885.00

Market value for at-risk units is estimated with the following assumptions:

1. Average market rent based on Fair Market Rents and Market Rents (FY 2021) established by HUD (Two-bedroom unit = \$1,060, and Three-bedroom unit = \$1,444).
2. Average size is assumed to be: 850 square feet for a two-bedroom apartment, and 1,200 square feet for a three-bedroom apartment.
3. Annual income is calculated on a vacancy rate = 5%.
4. Annual operating expenses per square foot = \$4.50.
5. Market value = Annual net project income * multiplication factor.
6. Multiplication factor for a building in good condition is 12.5.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. This option is applicable to all 42 units subsidized with Section 8. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low income household. **Table 32** estimates the rent subsidies required to preserve the affordability of the 42 at-risk units. Based on the estimates and assumptions shown in this table, approximately \$24,472 in rent subsidies would be required monthly (or \$293,664 annually). Assuming a 20-year affordability, the total subsidy is about \$5.9 million.

Table 32: Rental Subsidies Required

Unit Size	Total Units	Fair Market Rent ¹	Household Size	Very Low Income (50% AMI) ²	Affordable Cost – Utilities ³	Monthly Per Unit Subsidy	Total Monthly Subsidy
2-br	28	\$1060	3	\$31,500	\$585	\$475	\$13,300
3-br	14	\$1,444	4	\$34,950	\$646	\$798	\$11,172
Total	42						\$24,472

Notes:

1. Final FY 2021 Fair Market Rent (FMR) is determined by HUD.
2. Imperial County 2021 Area Median Household Income (AMI) limits set by the California Department of Housing and Community Development (HCD).
3. Affordable cost = 30% of household income minus utility allowance.

Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the subsidy amount received to market levels.

To purchase the affordability covenant on these projects, an incentive package should include interest subsidies at or below what the property owners can obtain in the open market. To enhance the attractiveness of the incentive package, the interest subsidies may need to be combined with rent subsidies that supplement the HUD fair market rent levels.

Replacement Option

The construction of new lower income housing units is a means of replacing the at-risk units should they be converted to market rate. The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs, and type of construction. Euclid Villas is comprised of two- and three-bedroom family apartment units. Assuming an average development cost of \$389,000 per unit for multi-family rental housing, replacement of the 42 at-risk units at Euclid Villas would require approximately \$16.3 million, excluding land costs, which vary depending upon location.

Table 33: Estimated New Construction Costs

Unit Size	(A)	(B)	(C)	(D)
	Total Units	Estimated Average Unit Size (sq. ft.)	Estimated Gross Building Size	Estimated Gross Building Costs
2-BR	14	850	14,280	\$4,270,937
3-BR	28	1,200	40,320	\$12,059,115
Total	42		54,600	\$16,330,052
Average Per Unit Cost:				\$388,810.76

(C) = (A) x (B) x 1.20 (i.e. 20% inflation to account for hallways and other common areas).

(D) = (C) x \$ 287 (per square foot construction costs) x 1.25 (i.e. 25% factor to account for parking and landscaping costs).

Note: City estimated construction costs ranged between \$200-\$250 for non-prevailing wage projects and \$300 for prevailing wage projects. The \$287 per square foot per construction cost based on a recent 56-unit project (45,000 sq ft).

Cost Comparison

The cost to build new housing to replace the 42 at-risk units is high, with an estimated total cost of more than \$16.3 million. This cost estimate is substantially higher than the cost associated with transfer of ownership (\$5.3 million) and providing rent subsidies similar to Housing Choice Vouchers for 20 years (\$5.9 million).

Resources for Preservation of At-Risk Units

A variety of potential funding sources are available for the acquisition, replacement, or rent subsidies; however, due to the high costs of developing and preserving at-risk housing relative to the amount of available local funds, multi-layering of local and non-local sources may be required. A more thorough description of resources for the preservation of at-risk units is presented in Section 4, Housing Resources. The City will continue to monitor the 42 at-risk units located in Euclid Villas and should a notice of intent to convert to market rate be filed, work with potential purchasers to preserve the units, and ensure that tenants were properly notified of their rights under California law.

3. Housing Constraints

Although El Centro strives to ensure the provision of adequate and affordable housing to meet the needs of the community, many factors can constrain the development, maintenance and improvement of housing. These include market mechanisms, government regulations, and physical as well as environmental constraints. This section addresses these potential constraints that affect the supply and cost of housing in El Centro.

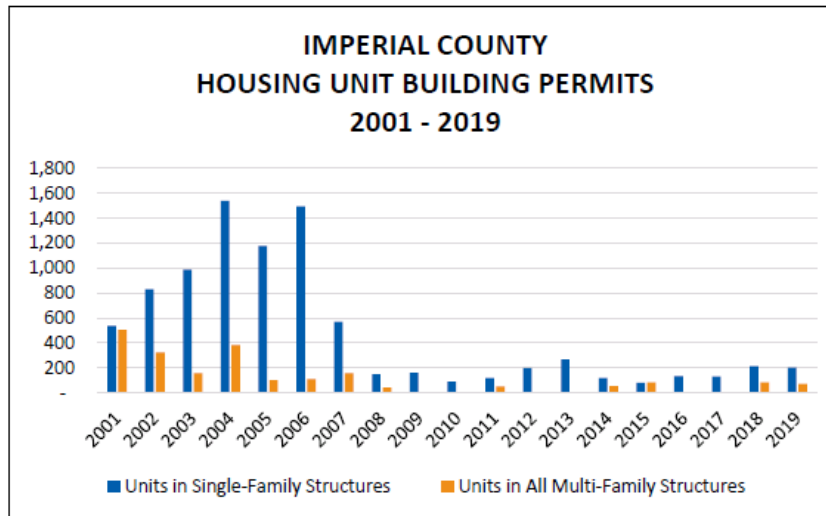
3.1. Market Constraints

Several local and regional constraints hinder the ability to accommodate El Centro's demand for affordable housing. The cost of land and development costs can make it expensive for developers to build housing. Historically, these constraints have resulted in housing that is often unaffordable to lower, and often moderate, income households, or may render some potential residential projects economically infeasible for developers. Subsidies are often necessary to bridge the gap between market rate and affordable housing costs by lower income households. In fact, most affordable housing developments in El Centro today often require multiple subsidy sources in order to make a project financially feasible.

According to the United States Department of Housing and Urban Development, Imperial County experienced a building boom in the residential development market prior to the recession (2001 - 2007) with over 7,000 permits issued for single-family residences, peaking twice above 1,500 permits issued annually. The same period also saw permits issued for over 1,700 units of multi-family housing. Since then, the market has not recovered, never reaching 300 permits issued annually for single-family residences, and no multi-family permits issued at all in half of the years, as shown in the chart below.

In El Centro, the time lapse between project entitlement and building permit issuance varies depending on project type. Delays are attributed few local building plan drafters, civil engineers, and architects that located in the County resulting in high workload for them as well as projects requiring outside financing, public subsidies, or grant funding that delay project commencement.

Figure 6: Imperial County Housing Building Permits (2001-2019)



Source: State of the Cities Data Systems (SOCDS).

A. Land Costs

Land costs vary significantly in the City depending on zoning, location of the property, and proximity to services. As of October 2020, the market value of a subdivided and residentially-zoned land served by infrastructure cost approximately \$200,000 per acre (a multi-family zoned 5.91-acre parcel was valued at 1,1800,000).

Although restricted financing for construction and home purchases have reduced demand for new residential construction in recent years, the cost of raw, developable land still comprises a significant portion of overall housing costs. For this reason, developers often seek City approval for the largest number of single-family lots or multi-family units allowed on a given parcel. This allows the developer to distribute the costs for new infrastructure improvements (e.g., streets, sewer lines, water lines, drainage, etc.) over a larger number of units to be sold or rented.

B. Construction Costs

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. As a result, builders are under constant pressure to complete a job for as low a price as possible while still providing a quality product. This pressure has led (and is still leading) to an emphasis on labor-saving materials and construction techniques.

The price paid for material and labor at any one time will reflect short-term considerations of supply and demand. Between 2003 and 2008, residential construction costs rose in response to an extremely active housing market. Since 2008, construction costs have moderated due to the housing industry downturn. Future costs are difficult to predict given the cyclical fluctuations in demand and supply that in large part are created by fluctuations in the state and national

economies. Such policies unilaterally impact construction in a region and therefore do not deter housing construction in any specific community.

For the average home, the cost of labor is generally two to three times the cost of materials and therefore represents a substantial component of the total cost of construction. Most relatively small residential construction jobs in Imperial County are performed with nonunion contractors; as a result, labor costs are responsive to changes in the residential market. The relative ease by which a skilled tradesperson can get a contractor's license further moderates the pressures that force labor costs to rise. Construction costs in El Centro are about the same as in other parts of Imperial County. According to City estimates in 2020, costs may range between \$75 and \$85 per square foot for single-family residences depending on the level of amenities provided, and \$230 to \$300 (prevailing wage) per square foot for multi-family residential structure, depending on construction type and excluding parking. These estimates are based on a 1,300-square-foot single-family home and a 56-unit project with a cost per unit of \$233,389.

A reduction in amenities and quality of building materials (above a minimum acceptability for health, safety, and adequate performance) could result in lower sale prices. Economy building techniques may reduce costs. In addition, prefabricated, factory-built housing may provide for lower priced housing by reducing construction and labor costs. Another factor related to construction costs is the number of units built at one time. As the number of units is increased, construction costs over the entire development are generally reduced based on economies of scale. This reduction in costs is of particular benefit when density bonuses are used for the provision of affordable housing.

C. Home Financing

The availability of financing can affect a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing, whether financed at market rate or with federal government assistance. Locally assisted mortgages (such as first-time homebuyer programs) are not subject to HMDA reporting.

Table 34 **Error! Reference source not found.** summarizes the disposition of loan applications submitted to financial institutions for home purchase, refinance and home improvement loans within El Centro in 2017. Included is information on loan applications that were approved and originated (i.e. accepted by applicant and issued), approved but not accepted by the applicant, denied, withdrawn by the applicant or closed for incomplete information.

Table 34: Disposition of Home Loans (2017)

Disposition	Home Purchase				Refinances		Home Improvement	
	Government Backed		Conventional					
	# of Appl'n	%	# of Appl'n	%	# of Appl'n	%	# of Appl'n	%
Approved, Originated	289	74.3%	267	66.9%	485	45.5%	51	45.5%
Approved, Not Accepted	16	4.1%	24	6.0%	33	3.1%	2	1.8%
Denied	38	9.8%	45	11.3%	206	19.3%	43	38.4%
Withdrawn/Incomplete	46	11.8%	63	15.8%	342	32.1%	16	14.3%
Total	389	100.0%	399	100.0%	1,066	100.0%	112	100.0%

Appl'n = Applications

Note: Due to a change in report formatting, the FFIEC and LendingPatterns had delayed release of more recent data after the reformatting.

Source: Lendingpatterns.com, 2020.

Home Purchase Loans

In 2017, a total of 389 households applied for government backed loans (e.g. FHA, VA) in El Centro. The overall loan approval rate was 78 percent and 10 percent of applicants were denied. The same year, 399 households applied for conventional home purchase loans and 73 percent of these applications were approved while 16 percent were denied.

To be eligible for government-backed loans, residents must meet the established income standards and the price of the home is capped according to the specific funding program regulations. For calendar year 2017, the FHA home price limit for Imperial County was \$484,350, well above the median home price in El Centro. FHA loans typically require a lower downpayment and people with less than stellar credit history may still qualify. Therefore, use of FHA in El Centro is popular when lending in the conventional market has tightened.

Refinance Loans

The conversion of introductory low-interest rate loans prevalent until about 2007 into high interest rates and subsequent changes in the housing market overall led El Centro residents to file 1,066 refinance loan applications in 2017. Approximately than half of the applications (49 percent) of the refinance loans were approved.

Home Improvement Loans

Only 112 El Centro residents applied for home improvement loans in 2017. Of these applicants, 47 percent were approved and 38 percent were denied. The large proportion of home improvement loan denials may be explained by the nature of these loans. These loans are usually second loans and therefore, many households may have already carried a high debt-to-income

ratio to qualify for additional financing. This pattern is also similar to the experience of residents living in other parts of California.

Foreclosures

Between 2000 and 2005, with low interest rates, “creative” financing (e.g., zero down, interest only, adjustable loans), and predatory lending practices (e.g. aggressive marketing, hidden fees, negative amortization), many households purchased homes that were beyond their financial means. Under the false assumptions that refinancing to lower interest rates would always be an option and home prices would continue to rise at double-digit rates, many households were (and still are) unprepared for the hikes in interest rates, expiration of short-term fixed rates, and decline in sales prices that set off in 2006. Suddenly faced with significantly inflated mortgage payments, and mortgage loans that are larger than the worth of the homes, many had to resort to foreclosing their homes. The City was hard hit by the 2008 foreclosure crisis. From January 2008 to March 2009, Imperial County had 4,122 foreclosures. Out of the 4,122 foreclosures, 1,026 were in El Centro. From July 2010 to April 2011, the City had 308 foreclosures which represented a 70 percent drop from the 2008 foreclosures. In July 2021, only 18 residential properties in El Centro were listed as foreclosures for sale (<http://www.homes.com>, accessed July 26, 2021\.). However, the full economic impact of the COVID-19 pandemic may present a different picture when State and Federal relief measures expire in the future.

D. Timing and Density

Non-governmental market constraints can also include timing between project approval and requests for building permits. In most cases, this may be due to developers’ inability to secure financing for construction. Developers at stakeholder interviews expressed that timing between project approval and issuance of building permits is critical since market can change quickly and may lead to changes in pricing. Increased costs are then added to the cost of the units. Timing varies from project to project - there are projects that submit to the Building Department within a month and are approved within four weeks, while other recent projects have taken from four months to five years. For example, Phase I El Dorado Family Apartments, which is currently under construction, took five years between the project approval and issuance of a building permit. The original planning approval for Phase I was given in 2015 but since it is an affordable housing development, the developer had to get funding and credits to line up. It took five years to secure all the funding and tax credits for Phase I. However, the developer was able to secure funding for Phase II of the project at the same time and resubmitted a Site Plan Review with Phase II in early 2020 that was approved on 3/9/2020. The developer started working on structural plans and civil plans to submit for both phases together and during that time the City met with the project developer to provide comments prior to building permit submittal.

In the example of Girasol Apartments (another affordable housing development), the project had some funding available. Therefore, the project developer able to submit for a building permit on December 9, 2019 – four months after planning approval on August 16, 2019.

The Town Center development (market rate development) that was recently completed was originally approved by Planning in 2017 but did not submit for building permit until November 17, 2019. The building permits were approved in late December 2019 but since it was a large

project, the developer decided to pull permits in three phases. This means that the approved building permits for Phase II and Phase III sat for some time. The last of Phase III buildings were pulled in June, July, and August of 2019 and they were “finaled” and issued certificates of occupancy in July of 2020.

As described in the Housing Resources section of this Housing Element, development projects proposed in El Centro are generally below the maximum density allowed. For all zones for which recent examples were available, developments reached between 50 and 76 percent the maximum allowable density. This is due primarily to the availability of vacant and relatively inexpensive land in El Centro, not due to the City’s development standards. Nevertheless, as part of the General Plan update, the City created a mixed use overlay to offer opportunities for different product types at more densely configured developments.

E. Efforts to Address Nongovernmental Constraints

The City has taken into consideration the nongovernmental constraints in the development of this Housing Element and its Land Use Element. Developers at the stakeholder meeting expressed that timing was the most critical non-governmental constraint since future materials prices, residential demand, mortgage rates are hard to predict and can change quickly. The City is committed to helping developers process their applications quickly. The City’s turnaround time for approval is relatively fast compared to other cities. A Site Plan Review (SPR) has a turn-around of five to six weeks for approval. If a project requires Planning Commission approval due to a CUP or parcel map, the turn-around time is six to eight weeks. Building Plan Check approvals are relatively quick, a multi-family development is usually approved within six to eight weeks while a single-family home and ADU can be approved within two weeks. The time consuming portion is taken by the applicant while they address redlines/corrections. The City offers many avenues to help developers address the changes needed. *If the building plan check is kept in house, the City’s building inspectors and building officials will, at the request of the applicant (or their architect/structural engineer), meet to review redlines/corrections. The City’s building department also receives phone calls to clarify the redlines/corrections and its building inspectors make time for those calls.*

In addition, the City has committed to assisting and support developers of housing for lower income households, especially housing for extremely low income households and the disabled (including the developmentally disabled), by conducting pre-application meetings, assisting with design and site requirements, and providing regulatory incentives and concessions (Program 5).

3.2. Governmental Constraints

Housing affordability is affected by factors in both the private and public sectors. Actions by the City can have an impact on the price and availability of housing in El Centro. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and nonprofit sectors, making it difficult to meet the demand for affordable housing and limiting supply in a region.

A. Land Use Controls

Local land use policies and regulations impact the price and availability of housing, including affordable housing. The following discussion of land use controls demonstrates that El Centro encourages the provision of residential land uses at various densities to facilitate the provision of housing for all economic segments of the community.

General Plan Land Use Designations

The El Centro General Plan was updated in 2021, including a comprehensive update to the Land Use Element and Mobility Element (formerly Circulation Element), and the preparation of a new Environmental Justice Element. The General Plan Land Use Element establishes policies to designate the general distribution and intensity of residential, commercial, industrial, and community facilities uses of the land in the City. As summarized in Table 35, the Land Use Element accommodates a wide range of housing types in the following land use designations.

Table 35: Land Use Designations that Allow Residential Uses

Land Use Element Designation	Max. Density/ FAR	Summary of Allowable Residential Uses
Rural Residential	2 du/ac	Single-family detached dwelling units and ADUs; small agricultural operations & rural-oriented residences and out-buildings.
Low Density Residential	6 du/ac	Single-family detached dwelling units, ADUs, & accessory buildings.
Medium Density Residential	12 du/ac	Single-family detached dwelling units, ADUs, mobile home parks, duplexes, or multiple-family units.
High-Medium Density Residential	25 du/ac	Variety of multi-family dwelling units.
Tourist Commercial	1.0:1 FAR	Motels, resort hotels, related commercial & tourist oriented uses, retail & freeway-oriented uses; multiple-family residential may be permitted.
Mixed Use 1	1.0:1 FAR (mixed use) min. 12 du/acre max. 25 du/acre, or 32 du/acre for senior projects	Multiple-family residential, live/work, & retail & service-oriented uses serving the needs of local neighborhoods; allows mixed use, stand-alone residential, stand-alone commercial developments.

Source: City of El Centro General Plan Land Use Element, 2021

Overlay Designations

Single-Family Neighborhood Overlay

The Single-Family Neighborhood Overlay is intended to recognize and preserve the historical character of El Centro's older residential neighborhoods that were developed in the early 1920s. As infill development occurs, the character of these neighborhoods has the potential to change as older, smaller bungalows are replaced with larger, modern homes or multi-family housing. The overlay will help facilitate the preservation of unique examples of single-family architecture that contribute to the City's heritage. In the event that an older single-family unit within the overlay needs to be replaced, such as in the event of a fire, owners are encouraged – but not required – to reconstruct in a similar style and scale as the original home.

Medical Office Overlay

The Medical Office Overlay allows properties within the overlay designation to transition to medical office, remain single-family residential, or allow a combination of both uses in a live/work project. Parcels that are redeveloped to medical office and live/work (medical office use) are encouraged to take access from the alley to the east of the overlay area and to close existing driveways that take access from Imperial Avenue to improve traffic flow and safety. The maximum FAR for live/work development in this overlay designation is 1.0:1, with a maximum density for live/work or residential development of 6 du/acre.

Mixed Use 2 Overlay

The Mixed Use 2 Overlay provides for a mix of Missing Middle, multi-family residential, and non-commercial uses to support an active, community- or regional-serving corridor, area, or activity center. A variety of housing options along a continuum of high-medium to higher densities are encouraged to provide affordable housing for a range of household types. This overlay encourages, but does not require, an integrated mix of residential and commercial uses on the same parcel. Stand-alone multi-family residential development is permitted, as is stand-alone non-residential development. The maximum FAR for mixed use (including live/work) is 1.2:1. The minimum residential density is 21 du/acre, and the maximum is 30 du/acre, with a maximum of 38 du/acre for senior projects.

Opportunity Areas

Opportunity Areas (OAs) identify locations where the City of El Centro desires or anticipates land use change or growth to occur. Several OAs are areas of existing development that can benefit from targeted plans and policies to help guide transformation, while others are proposed for property that either has not yet been developed and/or where growth is expected or proposed to occur. Each OA has a vision and policies to guide future planning. A key element of each OA is the correlation of land use and site design with proposed improvements to the mobility infrastructure. The following reflects the vision for each of the five OAs.

OA-1: Adams Avenue Mixed Use Village District

The Adams Avenue Opportunity Area is a compact, walkable and bikeable, transit-accessible, mixed-use area that provides a variety of new housing options and neighborhood commercial uses and services for existing and new residents.

OA-2: Downtown El Centro

Downtown El Centro is the cultural and social activity center for El Centro. It serves as a destination for arts, culture, creative industries, community-serving businesses, entertainment, and festivals, offering products, services, and fun for locals and visitors alike.

OA-3: North Dogwood Opportunity Area

The North Dogwood Opportunity Area is designated for Tourist Commercial land use. Coupled with its size and proximity to the I-8 freeway, offers many opportunities for a variety of larger-scale uses to attract locals and tourists alike. Big-box retail, indoor and/or outdoor recreational, entertainment, and amusement venues, and other tourist-supporting uses would benefit from the area and the location.

OA-4: South Dogwood Opportunity Area

The South Dogwood OA is a mixed-use activity center that continues to be a regional shopping destination within a walkable village of higher density residential, recreational, and other compatible uses that attract locals and visitors alike. The area provides a variety of housing choices that appeal to seniors.

OA-5: South Imperial Avenue

The vision for OA-5 promotes implementation of the mixed-use village concept both for individual projects and for the area as a whole as El Centro expands to the south. The interchange at Imperial Avenue and I-8 and the extension of Imperial Avenue south to McCabe will open hundreds of acres of vacant property within both the City and the SOI to development as residential and commercial use.

Master Planned Mixed Use Special Planning Area

The General Plan Land Use Element includes a Special Planning Area that is proposed for an area within the City's Sphere of Influence in the vicinity of the future extension of Imperial Avenue. The intent of this Master Planned Mixed Use Special Planning Area is to provide guidance for how future development should occur if the area is annexed, with an emphasis on sustainability and Smart Growth principles. While actual density and intensity standards will be established for this area if it is annexed, it was assumed that approximately 60 percent of net area will develop with an average density of 8.5 du/ac across the entire area. The expectation is that a full range of residential types and densities will be provided, including but not limited to attached and detached single-family residential, small-lot single-family residential, cottage/court style housing, townhouses, duplexes, triplexes, quads, stacked flats (apartments), accessory dwellings, live/work units, and senior housing.

Urban Development Program

The General Plan incorporates an Urban Development Program, which was adopted to direct and control growth in the City and sphere of influence (SOI). The goal of the program is to create a community that is compact and pedestrian and transit-oriented development, avoids removing more agricultural land from production than necessary, and can meet the public service and infrastructure needs of existing and future residents. Development "tiers" are established for the

SOI and implementation of the program will ensure that a variety of growth locations are available and timed to maintain reasonable housing costs and promote economic development.

To identify those areas that will require more extensive planning, ensuring the provision of adequate levels of public services and facilities, the undeveloped portion of the planning area for the Urban Development Program has been divided into three development tier areas, as described below. Designation of an area in one of the three tiers does not determine the sequence of development within the planning area, but rather, delineates those areas that, due to a lack of public facilities, may require more detailed planning prior to development. For example, development in Development Tier II and III may require a greater cost for infrastructure improvements than would the same development if located within the Development Tier 1 area, since Tier 1 has greater access to existing public services and facilities. Tier II and III areas also may require that facilities be sized, at developer expense, to accommodate additional development within an entire Tier Subarea (described below), or such larger area as may be required by the City. Reimbursement agreements, improvement districts, and other public finance strategies may be used to cost-effectively provide needed public infrastructure, as deemed necessary by the City Council.

Specific Plans

The General Plan anticipates and encourages the use of specific plans when designing new projects, especially those that will include large areas of land. For example, future development proposed within Urban Development Program Tiers II/III may benefit most from the specific planning process. The specific plan process allows for a more comprehensive planning process for the target area and can be a mechanism to allow for flexibility in the design and location of future land uses.

Airport Land Use Plan

Due to the close proximity of the Imperial County Airport, land use options are limited in a portion of northern El Centro. The Imperial County Airport Land Use Commission is responsible for maintaining an Airport Land Use Plan (ALUP), which includes a set of land use compatibility criteria for lands surrounding the Imperial County Airport. Portions of northern El Centro are located within the D zone, representing negligible risk from airport activity, whereas other areas are in the approach and departure zones (B1/B2) and are subjected to risk and noise exposure.

The ALUCP for the Imperial County airports was approved in 1982 and last revised in 1996. The California Department of Transportation (Caltrans) Airport Land Use Planning Handbook (Caltrans Handbook) was revised in 2011, and identifies modified geometrics, naming conventions, and evaluation criteria for ALUCP map zones. Until the ALUCP is revised to reflect the most current Caltrans Handbook, applicable proposed actions are analyzed pursuant to the Caltrans Handbook to enable the Imperial County Airport Land Use Commission to determine if they comply with current Caltrans regulations.

The City's Zoning Ordinance includes a Residential Airport Zone (RAP) that regulates development to ensure consistency with the ALUP. The Residential Sites Inventory does not

include any parcels within the RAP zone. The ALUP is not considered a significant constraint in El Centro.

B. Residential Development Standards

The City's Zoning Ordinance (Chapter 29 of the El Centro Municipal Code) regulates the type, location, density and scale of residential development for areas of the City. Zoning regulations are designed to protect and promote the health, safety and general welfare of residents as well as implement the policies of the General Plan. Table 36 below provides a summary of the range of residential land uses and associated densities and Floor-Area-Ratio (FAR) allowed in the City pursuant to the Zoning Ordinance. New residential construction and alterations to existing structures and sites must conform to the development standards summarized in Table 37.

Table 36: Zoning Districts that Allow Residential Uses

Zoning Category	Max. Density/FAR	Notes
Residential Airport (RAP)	1 du/ac	Allows for the development of residential uses within areas designated as "extended approach/departure zone" under the Imperial County Airport Land Use Compatibility Plan where risk factors have been identified resulting in the need for restricting density. A conditional use permit (CUP) is required for residential development in this zone.
Rural Residential (RR)	2 du/ac	Provides for large lot rural residential uses and is intended to implement the Rural Residential general plan land use designation.
Low Density (R1)	7 du/ac	Provides for the development of a single-family home (or mobile home on a permanent foundation) and the protection of these dwellings from incompatible uses. Intended to implement the Low Density Residential general plan land use designation.
Medium Density (R2)	12 du/ac	Permits the development of medium density, single-family, duplex, or multi-family dwellings and is intended to implement the Medium Density Residential general plan land use designation.
High-Medium Density (R3)	25 du/ac	Permits the development of medium high density apartment and condominium dwellings and is intended to implement the High Medium Density Residential general plan land use designation.
Tourist Commercial (CT)	1:1 FAR	Allows for some types of multi-family and mixed-use residential by CUP and is intended to implement the Tourist Commercial general plan land use designation.
Office Commercial (CO)	0.40:1 FAR	This zone is intended for establishment of professional and administrative offices, medical care centers and ancillary services with appropriate landscaping and development standards which provide relative compatibility for such uses near residential areas. The CO zone is intended to implement the office commercial general plan land use designation.
Neighborhood Commercial (CN)	0.25:1 FAR	This zone is intended for retail uses serving principally the convenience shopping needs of the neighborhood in which it is located. Caretaker's residences are permitted in this zone. The CN zone is intended to implement the neighborhood commercial general plan land use designation.

Table 36: Zoning Districts that Allow Residential Uses

Zoning Category	Max. Density/FAR	Notes
General Commercial (CG)	0.50:1 FAR	This zone is intended for general business, light service and retail uses, as well as large-scale planned shopping districts and, where appropriate, hotel and public assembly uses. Caretaker's residences, homeless shelters, and group care facilities are permitted/conditionally permitted in this zone. The CG zone is intended to implement the general commercial general plan land use designation.
Heavy Commercial (CH)	0.50:1 FAR	This zone is intended for general commercial uses, business and consumer services, and light manufacturing. Caretaker's residences and homeless shelters are permitted in this zone. The CH zone is intended to implement the heavy commercial general plan land use designation.

Source: City of El Centro Municipal Code, 2021

The zoning code is consistent with General Plan densities, and allows development at up to 25 du/acre in the most dense residential zones (R3). Maximum density in commercial zones is regulated by cumulative application of the development standards, including maximum height, lot coverage, FAR, parking, and setbacks. Up to 45 feet (or 3 stories) and 60 percent lot coverage is allowed within the R3 zone.

The recently updated General Plan adds a new Mixed-Use 1 land use category, which promotes mixed use development with 1.0:1 FAR (mixed use), yet allows the flexibility for stand-alone commercial or stand-alone residential at densities of a minimum 12/du/acre, up to 25 du/ac, or up to 32 du/acre for senior housing developments. A new Mixed-Use 2 overlay is added for which the minimum residential density is 21 du/acre, and the maximum is 30 du/acre, with a maximum of 38 du/acre for senior projects. Because the updated Land Use Element of the General Plan was adopted in June 2021, a program has been developed to update the zoning code to allow mixed use development at these densities.

Table 37: Development Standards by Zoning District (Residential Zones)

Standard	RAP	RR	R1	R2	R3
Min. Lot Size:					
Single-family	1 acre ¹	½ acre	6,000 sf	3,600 sf	3,600 sf
Multi-family	N/A	N/A	N/A	7,200 sf	7,200 sf
Max. Lot Coverage	35%	25%	50%	50%	60%
Min. Lot Width	150 ft	100 ft	50-60 ft	60-65 ft	60-65 ft
Min. Lot Depth	150-200 ft	100-200 ft	60-150 ft	65-150 ft	65-150 ft
Max. Building Height ²	35 ft	35 ft	35 ft	35 ft	45 ft
Open Space ³					
2 units on a lot	400 sf	400 sf	400 sf	400 sf	400 sf ⁴
>2 units on a lot	150 sf	150 sf	150 sf	150 sf	150 sf ⁴

Table 37: Development Standards by Zoning District (Residential Zones)

Standard	RAP	RR	R1	R2	R3
Setbacks:					
Front	60 ft	40 ft	20 ft	20 ft	20 ft
Rear ⁵	20-50 ft	10-50 ft	5-50 ft	5-50 ft	5-50 ft
Side	0-30 ft	0-20 ft	0-15 ft	5-20 ft	5-20 ft

Source: El Centro Municipal Code, 2021.

Notes:

- ¹ Density of one du/acre is required per the General Plan; however, densities consistent with the R1 zone may be allowed as a cluster development, subject to CUP and so long as the average densities within the designated “extended approach/departure” areas do not exceed one du/acre.
- ² A CUP may be granted to authorize additional exceptions to height limits in any zone.
- ³ When a private open space area greater than ninety-six (96) square feet with a minimum width of eight (8) feet is provided for each dwelling unit, the total common open space requirements may be reduced by twenty-five (25) percent.
- ⁴ In addition, a minimum of 50 square feet of private of private open space required contiguous to each dwelling unit.
- ⁵ The top end of setback range applies to lots abutting a freeway.

Table 38: Development Standards by Zoning District (Commercial Zones)

Standard	CT	CO	CN	CG	CH
Min. Lot Size:	7,200 sf	6,000 sf	N/A	N/A	N/A
Max. Lot Coverage	60%	40%	N/A	N/A	N/A
Min. Lot Width	60-65 ft	60-65 ft	N/A	N/A	N/A
Min. Lot Depth	100-150 ft	100-135 ft	N/A	N/A	N/A
Max. Building Height ¹	65 ft	65 ft	45 ft	65 ft	45 ft
Setbacks:					
Front	20 ft	20 ft	20 ft	0 ft	0 ft
Rear ⁵	5-25 ft	5-25 ft	0-25 ft	0-25 ft	0-25 ft
Side	5-15 ft	5-15 ft	0-15 ft	0-10 ft	0-10 ft

¹ A CUP may be granted to authorize additional exceptions to height limits in any zone.

The maximum height of residential buildings in the RAP, RR, R1 and R2 zones is 35 feet, which is sufficient to accommodate two-story buildings. Maximum lot coverage ranges from 25 percent in the RR zone to 50 percent in the R1 and R2 zones.

Open space requirements apply within all residential zones. At least 400 square feet of common open space is required per unit when two units are proposed on a lot and 150 square feet per unit is required when more than two units are proposed. In the R3 zone, a minimum of 50 square feet of private of private open space required contiguous to each dwelling unit. The Zoning Ordinance allows a 25 percent reduction in total common open space when a development provides more than 96 square feet of private open space per unit with a minimum width of eight feet. This Housing Element includes a program to update the City’s open space requirements to allow a reduction in open space when high-quality community amenities, such as play structures or covered seating and food preparation areas, are provided. The City will also evaluate incentives to encourage developers to design required stormwater systems to accommodate passive recreational areas to increase available common open space.

Overall, El Centro's development standards are typical for the region and have not been a constraint on residential development. In the past four years there have been six larger single-family and multi-family developments, creating a total of 109 single-family dwellings and 243 multi-family dwellings. However, only 22 of these have been developed as affordable units.

Density Bonus Ordinance

Density bonuses, together with the incentives and/or concessions, allow residential projects to exceed maximum densities within a zone, and result in a lower average cost of land per dwelling unit thereby making the provision of affordable housing more feasible. The City's density bonus regulations were most recently updated in 2013. Since then, there have been a number of changes to density bonus requirements in state law. AB 1763 (enacted in 2019) requires a density bonus to be granted for projects that include 100 percent lower income units, but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Density bonus projects must be allowed four incentives or concessions and, for developments within ½ mile of a major transit stop, a height increase of up to three additional stories or 33 feet. A density bonus of 80 percent is required for most projects, with no limitations on density placed on projects within ½ mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special needs housing, as defined. AB 2345 (enacted in September 2020) further incentivizes the production of affordable housing by increasing the maximum available density bonus from 35 percent to 50 percent for qualifying projects not composed exclusively of affordable housing.

The Housing Plan includes a program to update the City's zoning ordinance to bring density bonus regulations into compliance with currently adopted state law. The City will also continue to work with developers on a case-by-case basis to provide regulatory concessions and incentives to assist them with the development of affordable and senior housing. Working alongside developers on a case-by-case basis is the most effective method of providing technical assistance as each individual project can be analyzed to determine which concessions and incentives would be the most beneficial to the project's feasibility.

Parking Requirements

Parking requirements for different types of residential uses in El Centro are summarized in Table 39. The requirements are in line with typical off-street parking required for residential uses throughout the region. The requirements for multi-family apartment developments are reasonably adjusted for unit size and the requirements for multi-family and senior apartments are lower than ratios available to affordable housing developers pursuant to State density bonus law. Off-street parking requirements do not pose a constraint on housing development in El Centro. The Housing Plan includes a program to establish an accessory dwelling unit ordinance with parking requirements conforming with state law. As part of this program, the City will also evaluate reductions to off-street parking requirements for multi-family residential uses.

Table 39: Off-Street Residential Parking Requirements

Use	Parking Spaces Required
Single-family	2.0 / du
Duplex	2.0 / du
Multi-family	
Studio	1.0 / du + 0.25 / du (guest)
1 BR	1.5 / du + 0.25 / du (guest)
2 BR	2.0 / du + 0.25 / du (guest)
3+ BR	2.0 / du + 0.50 / br over 3, plus 0.25 / du (guest)
Condos or Townhomes	2.0 / du + 0.25 / du (guest)
Second Dwelling Unit	1.0 / du + 0.50 / br over 2
Senior Apartments	1.0 / du + 0.25 / du (guest)
Mobile homes in parks or planned developments	1.0 / du + 1.0 / 6 du (guest) + 1.0 / 10 du used for recreation center parking
Rest homes	1.0 / 1,000 sf

Source: City of El Centro Zoning Ordinance, 2021

C. Provisions for a Variety of Housing Types

State Housing Element law specifies that jurisdictions identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of various types of housing for all economic segments of the population. This includes single-family housing, multi-family housing, mobile homes, farm employee housing, emergency shelters, transitional and supportive housing, among others. Table 40 and Table 41 summarize the various housing types permitted and conditionally permitted under the City’s Zoning Ordinance.

Table 40: Provision for a Variety of Housing Types (Residential Zones)

Housing Type	RAP	RR	R1	R2	R3
Single-Family	P	P	P	P	P
Mobile Home ¹	P	P	P	P	P
Duplex and Two-Family Dwelling	X	X	X	P	P
Multi-Family Dwellings	X	X	X	P	P
Group Dwellings	X	X	X	X	P
Mobile Home Park	C	C	C	C	C
Senior Apartments	X	X	X	C	C
Retirement Homes	X	X	X	C	C
Rest Homes, Convalescent Homes and Nursing Homes	X	X	X	X	C
Second Dwelling Unit	P	P	P	P	P
Homeless Shelters, Emergency Shelters	X	X	X	X	P
Guest Dwellings	P	P	P	X	X
Accessory Unit	P	P	P	P	X
Small Residential Care Facilities, Group Homes, Supportive Housing, Transitional Housing	P	P	P	P	P

Table 40: Provision for a Variety of Housing Types (Residential Zones)

Housing Type	RAP	RR	R1	R2	R3
Large Residential Care Facility	X	P	P	P	P
Farm Employee Housing (Incidental to Ag Use)	X	P	X	X	X

Table 41: Provision for a Variety of Housing Types (Commercial Zones)

Housing Type	CT	CO	CN	CG	CH
Caretaker's Residence	X	X	P	P	P
Convalescent Homes	X	C	X	C	C
Group Care Facilities and Residential Retirement Hotels	C	C	X	C	X
Multi-Family Residential or Residential Units on 2 nd Floor and Above Commercial Uses, Including Residential Care Facilities, Transitional Housing and Supportive Housing	C	X	X	X	X
Homeless Shelters, Emergency Shelters	X	X	X	P	P
Single Room Occupancy Buildings	C	X	X	X	X
Detached Single-Family Accessory Residential Unit ^{1, 2}	P	P	P	P	P
Mixed Use	X	X	X	C	X

¹ In any commercial or manufacturing zone, a single accessory residential unit may be established when it is located within and occupies not more than 20 percent of the floor area of a commercial or industrial building, and is occupied exclusively by the owner, caretaker, superintendent, or security personnel and his/her family

² Within the ML (Light Manufacturing) or MG (General Manufacturing) zones only, a detached single-family accessory residential unit is permitted, provided that it occupies not more than 20 percent of the floor area occupied by the principal manufacturing use and is screened from view from any public street in a manner satisfactory to the city

Single-Family

The term “dwelling, single-family” is defined in the Zoning Ordinance as a detached building or mobile home designed primarily for the use of a single family and no portion of which is to be rented separately. The Housing Plan includes a program to update to zoning ordinance to ensure regulations for single-family dwellings conform to state law allowing Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs), and to facilitate the development of ADUs/JADUs. Single-family units are permitted by-right in all residential zones.

Mobile Homes and Manufactured Housing

The El Centro Zoning Ordinance defines mobile home as a structure designed as a permanent dwelling unit to be used with or without a permanent foundation, and which is in excess of eight feet in width or in excess of 40 feet in length. This definition includes “manufactured home” as defined in the California Health and Safety Code.

A mobile home that was constructed after September 15, 1971, and was issued an insignia of approval by the state Department of Housing and Community Development or a mobile home that has been certified under the National Mobile Home Construction and Safety Standards Act of 1974 (42 U.S.C. § 5401 et seq.), and located on a permanent foundation is permitted in all residential zones on lots where no other mobile home on a permanent foundation, single-family dwelling or multi-family dwellings are located, regardless of the lot size and the number of dwelling units otherwise permitted by the Zoning Ordinance.

Mobile Home Parks

Mobile home parks include an “area or tract of land where two (2) or more mobile home lots are rented or leased or held out for rent or lease to accommodate mobile homes for human habitation.” Mobile home parks are permitted in all residential zones with approval of a CUP.

Accessory Dwelling Units

An Accessory Dwelling Unit (ADU) is a dwelling unit with complete independent living facilities for one or more persons. A Junior Accessory Dwelling Unit (JADU) is a type of ADU that is 500 square feet or less and located within a primary residence. The Zoning Ordinance currently includes two different types of dwellings that can be classified as ADUs. These include a “second dwelling unit”, defined as “a separate residential unit containing sleeping quarters, kitchen and bathroom facilities independent of the main dwelling on the site,” as well as an “accessory unit”, defined as a dwelling unit, attached to a primary residence by roofline, providing complete, independent living facilities for no more than two (2) persons including permanent provisions for living, sleeping, eating, cooking and sanitation, and having only one (1) kitchen. While the current definition of “accessory unit” specifies that these units should not be considered ADUs as defined in state law, effectively they function as ADUs. The City currently reviews ADUs in accordance with State legislation. As long as the lot is zoned residential then it is allowed to construct an ADU and a JADU via an administrative review. The turn-around time for an administrative review is one to two weeks. The City is currently drafting an ADU ordinance to mirror State legislation and is expected to be adopted in early 2022. The Housing Plan includes a program to update the zoning ordinance to bring this definition into compliance with state law.

The Zoning Ordinance also includes “guest dwellings,” defined as “living quarters within an accessory building, for use exclusively by temporary, non-paying guests of the resident family, such quarters having no cooking or plumbing facilities except plumbing facilities for a bathroom.” Because these dwellings do not include complete independent living facilities, they do not qualify as ADUs.

The Zoning Ordinance allows ADUs by right in all residential zones, and in most commercial and industrial zones. They are permitted in accordance with California Government Code section 65852.2. Between 2013 and 2019, 33 building permits were issued for ADUs.

Duplexes

Duplexes are a multi-family dwelling “in which two (2) dwelling units are attached and located together on a lot or building site.” Duplex buildings are allowed by-right in the R2 and R3 zones, subject to ministerial Site Plan Review.

Multi-Family

El Centro's Zoning Ordinance defines "dwelling, multiple-family" as "a building or buildings designed and used for occupancy by two (2) or more families, all living independently of each other and having separate kitchen and toilet facilities for each family." Multi-family dwellings are allowed by-right in the R2 and R3 zones, subject to ministerial Site Plan Review. Multi-family dwellings are also allowed in the CT zone with approval of a CUP by the Planning Commission. A new Mixed Use land use designation and overlay were adopted into the Land Use Element as part of the General Plan update in June 2021, which allow multi-family residential uses. A program has been developed to update the zoning code to implement the new land use designations.

Mixed-Use

Mixed-use buildings and developments are allowed with approval of a CUP by the Planning Commission in the CT zone. A mixed-use building is defined by the City as a "structure or project with both residential and pedestrian-oriented commercial uses (including retail, restaurants, offices, services and similar uses deemed compatible with residential uses). The commercial use or uses are typically located on the ground floor of the structure with the residential dwellings predominantly located on the second or higher floors." The Zoning Ordinance draws a distinction between mixed-use buildings and mixed-use developments. A mixed-use development is defined as a "project with both residential and non-residential uses located on the same lot or site. With this type of development, there is no requirement that the residential and the non-residential uses be located in the same building."

Group Dwellings

The City allows "group dwellings" by-right in the R3 zone, subject to ministerial Site Plan Review. Per the Zoning Ordinance definition, this use includes "apartment hotels, boarding, rooming or lodging houses consisting mainly of living units without individual kitchens which are rented on a weekly basis or longer. Also includes student dormitories and retirement homes providing congregate dining facilities." Group dwellings can provide a valuable form of affordable private housing for seniors, persons with disabilities, and lower income households, including extremely low income households, and can serve as an entry point into the housing market for formerly homeless people.

Single Room Occupancy (SRO) Buildings

The City revised the Zoning Ordinance in April 2013 to define SRO buildings and allow the use with approval of a CUP by the Planning Commission in the CT zone. The Zoning Ordinance defines SRO buildings as "a building providing single-room units for one or more persons with or without shared kitchen and bath facilities, including efficiency units per Health and Safety Code Section 17958.1." Like group dwellings, SROs can be another source of affordable housing for lower-income households, including extremely low income households.

Residential Care Facilities

The City of El Centro defines “residential care facility” to include “various types of facilities operated by licensed staff that provide twenty-four (24) hour non-medical supportive and custodial care for children, adults, and the elderly who need general assistance for everyday living. The facilities are licensed by the state department of social services and are not considered to be health facilities. The facilities are referred to by a variety of terms, including: group homes, family care homes, foster family homes, small family homes, special needs housing, adult residential facilities, social rehabilitation facilities, residential board and care facilities, assisted living facilities, residential care facilities for the chronically ill, and residential care facilities for the elderly. See California Health and Safety Code § 1502(a).”

The Zoning Ordinance distinguishes between small and large residential care facilities. The Lanterman Developmental Disabilities Services Act provides that state-licensed residential care facilities serving six or fewer individuals must be treated no differently than any other residential use. Consistent with State law, the City allows small residential care facilities that serve six or fewer clients in all residential zones, subject to the same development standards and permit processing requirements as other types of housing in the same zone.

Large residential care facilities serving seven or more clients are allowed by right in the RR, R1, R2, and R3 zones. Residential care facilities are also allowed with approval of a CUP by the Planning Commission in the CT zone, the same as multi-family residential developments in these zones. Large residential care facilities serving seven or more clients are allowed by right in the RR, R1, R2, and R3 zones. Large residential care facilities are also allowed with a CUP in the CT zone. Allowable zoning and permit requirements may constrain the development of some larger facilities. A program has been added to this Housing Element for the City to evaluate the provisions for permitting large residential care facilities ensure that permitting requirements and zoning do not unduly constrain development of these facilities, and to review the Development Code as necessary.

Transitional and Supportive Housing

Transitional and supportive housing are allowed by-right in all residential zones, and with a conditional use permit in the CT zone, where multi-family housing is also similarly permitted. The City has not adopted any special or unique development standards, findings, or other criteria for either use.

Pursuant to SB 745 (2013), transitional housing is defined as “rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance. Transitional housing that is provided in single-family, duplex, manufactured housing, multi-family, mixed-use units, or group dwellings shall be permitted, conditionally permitted or prohibited in the same manner as the other single-family, duplex, manufactured housing, multi-family, mixed-use units, or group dwellings. See Government Code 65582.

Supportive housing is defined as means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

Furthermore, AB 2162 (September 2018) requires that supportive housing meeting specific criteria to be permitted by right in zones where multi-family and mixed-use developments are permitted. Specific criteria include the size of the project and percentage set aside for target population, and specified amount of floor area for supportive services, among others. The Housing Plan includes a program to update the Zoning Ordinance to comply with AB 2162.

Emergency Shelters

State law requires that local jurisdictions identify a zone or zones where emergency shelters are allowed with a non-discretionary (i.e., ministerial) review. The Zoning Ordinance defines “emergency shelter” as “a housing facility that provides temporary overnight shelter for persons with no permanent housing with minimal support services in which residency is limited to six (6) months or less and is not related to the person's ability to pay. Such facilities may offer services to meet basic needs such as food, clothing, and limited medical care. See California Health and Safety Code § 50801(e).” The 2017 Point in Time Count, the most recent year for which data was available for individual jurisdictions, identified 286 homeless individuals living in El Centro. The 2020 Point in Time County by the Imperial Valley Continuum of Care estimates an unsheltered homeless population of 1,334 countywide. Proportionally, the homeless population in El Centro can be generally estimated at 332 persons (24 percent of County population).

Emergency shelters are allowed by right in the R3, CG and CH zones, subject to ministerial building permit review. The City has not adopted unique development standards or criteria for this use. The City has more than 60 acres of vacant land within the R3 zone, as well as nearly 17 acres of vacant land use in the CH zone. The R3 and CH zones are located primarily along the City’s transportation corridors and/or are located close to public transportation and services. With no limit on the number of beds allowable per shelter, and no distance requirements between shelters, the vacant land within the City is adequate to accommodate emergency shelters for the City’s unsheltered homeless population.

Low Barrier Navigation Center (LBNC)

Adopted in 2019, AB 101 requires cities to permit Low Barrier Navigation Centers by right in areas zoned for mixed-use and nonresidential zones that permit multi-family uses, if the center meets certain requirements. AB 101 defines a Low Barrier Navigation Center as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing

homelessness to income, public benefits, health services, shelter, and housing.” AB 101 is effective through the end of 2026, at which point its provisions are repealed. The Housing Plan includes a program to address this new requirement.

Farm Employee Housing

Pursuant to the California Employee Housing Act (Section 17000 of the California Health and Safety Code), any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation. Employee housing for six or fewer people must be permitted wherever a single-family residence is permitted. To comply with state law, no conditional use permit or variance can be required for employee housing. The zoning ordinance does not reference employee housing, or define it as a distinct use. When employee housing for six or fewer people is provided in a single-family residence it is regulated in the same way as comparable single-family residences.

The Zoning Ordinance defines “farm employee housing” as “Housing that is incidental or accessory to a permitted agricultural use and provides accommodations for six or fewer employees within a single-family structure. See Section 17021.5 of the California Health and Safety Code.” Incidental farm employee housing is allowed by right within the RR, rural residential zone.

The California Employee Housing Act further requires housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household be considered an agricultural land use, and permitted in the same way as other agricultural uses. Although the General Plan does not include an agriculture land use designation, commercial agricultural operations are allowed by right within the RR zone. The Housing Plan includes a program to update the zoning ordinance to allow housing for agricultural workers as defined by the California Employee Housing Act in the RR zone as required by state law.

D. Site Improvements, Exactions and Development Fees

Site Improvements

The City requires on- and off-site improvements for all new residential projects, including single-family, multi-family, and mixed-use developments. Projects are typically required to provide off-street parking with adequate lighting on site, internal driveways and access roads as needed, as well as common open space, on-site landscaping, appropriate irrigation and drainage facilities, fire hydrants and fire prevention systems, and at least one ADA accessible pathway between the right-of-way and a project entrance. Perimeter fencing, lighting, and decorative paving may also be required.

Typical off-site improvements include sidewalk construction and/or repair adjacent to the property, water, sewer, and stormwater facilities, street landscaping, restriping or other improvements in the right-of-way to allow project access, dedication of easements and/or right-of-way for future use by the City, and roadway construction. The Mobility Element includes roadway classifications for key existing and future roadways in the City. The design of each roadway varies by type, and the Mobility Element allows flexibility in design to accommodate multiple transportation modes. These minimal improvements are necessary to promote the

health, safety, and general welfare of the public. The costs of improvements are the responsibility of developers and are applied uniformly to all projects within the City.

As a mostly built-out city, the infrastructure, including streets and other infrastructure, is in place in the majority of El Centro that is designated to allow moderate- and lower-income households. Areas that are yet to be developed with residential uses are almost exclusively designated for lower density residential development, with the majority being single-family subdivisions, many of which have already been approved but are not yet built. Street widths have never been identified as a constraint to residential development in El Centro. However, the City works with developers on a project-by-project basis regarding infrastructure for new SFR subdivisions and accommodations can be made if and when necessary. For three recently-approved housing projects in the City, the following improvements were required:

- Paved off-street parking spaces
- Removal of old access driveways and replacement with new driveways, including colored or textured paving
- Landscaping and irrigation within parking areas and the project site, including both trees and other landscaping plants
- ADA accessible pathway between the right-of-way and project entrance
- Common usable open space serving project residents
- Private open space for resident use
- Outdoor lighting, including lighting for parking areas
- Laundry facilities for residents
- Screened trash and recycling collection areas
- Decorative perimeter fencing and sound walls
- Irrigation, building, and fire backflow preventers
- Fire alarms, hydrants, and sprinkler systems
- Curb and gutter improvements on streets fronting the project property
- Sidewalk repair and/or construction on streets fronting the project property
- Right-of-way dedication to allow for roadway improvements in the project vicinity, and/or construction of roadway improvements including curb, gutter, sidewalk, streetlight, striping, and paved roadways
- Easements for stormwater improvements
- Storm drain facilities

Development Fees and Exactions

In addition to improvements and dedications of land for public purposes, housing developers are subject to variety of fees and exactions to cover the cost of processing permits and providing necessary services and facilities. In general, these fees can be a constraint on housing development and compromise project feasibility because the additional cost borne by developers contributes to overall increased housing unit cost. However, the fees are necessary to maintain adequate planning services and other public services and facilities in the City.

For new residential projects, developers in El Centro may be required to pay one or more of the following fees depending on the location, type, and size of the project:

- Planning, Building, and Environmental Fees: The City of El Centro charges developers standard plan check fees, fees for processing applications, building permits, subdivision maps, environmental initial study, variance, conditional use permit, or other permits to pay for the cost of processing applications and conducting inspections for specific projects. This does not include additional fees paid by the developer for project-specific environmental impact reports (EIRs); however, a Program EIR was prepared for the General Plan Update adopted in June 2021, so new projects will be able to use that document to substantially reduce future environmental review costs and timeframes within the 6th Cycle.

Table 42: Permit Processing Fees

Type	Amount
Planning Permits	
Variance	\$1,076.81
Conditional Use Permit	\$2,907.40
General Plan Amendment	\$3,768.85
Zone Change	\$3,015.08
Site Plan Review	\$753.77
Specific Plan	\$9,745.16
Development Agreement	\$3,445.80
Administrative Committee Review	\$753.77
Subdivisions	
Lot Line Adjustment	\$753.77
Parcel Map (<5 lots)	\$753.77
Subdivision Map (5+ lots)	\$4,845.66
Environmental	
Initial Study	\$2,153.63
Negative Declaration	\$1,399.86
Environmental Impact Report (Review)	\$5,599.43

Sources: City of El Centro, User Fee Schedule, 2021.

- City Impact Fees: The City charges impact fees to finance new or expanded infrastructure and public facilities required to serve residents. The fee must have a reasonable relationship to the infrastructure costs and represent the marginal cost of improvements required to serve residents of the new residential projects. The City charges fees to offset impacts to parks, libraries, police, fire, sewer, streets, and general government facilities.
- School Impact Fees: Impact fees are collected by school districts as allowed by State law to finance the construction and expansion of schools to accommodate student enrollment. The City of El Centro does not set these fees and does not have discretion to waive, reduce, or defer these fees.

A summary of the City’s permit processing and development impact fee schedules are included in Table 42Error! Reference source not found. and Table 43.

Table 43: Development Impact Fees

Type	Single-Family	Mobile Home	Multi-Family
City Impact Fees ¹			
Parks	\$1,288	\$1,037	\$921
Library	\$714	\$575	\$510
Police	\$377	\$303	\$269
General Government	\$932	\$750	\$666
Fire	\$621	\$500	\$444
Streets	\$283 - \$383	\$267	\$160 - \$240
Sewer	\$4,304 - \$7,174		
Water	\$3,689 - \$6,149		
School Impact Fees			
El Centro Elementary School District	\$2.62/sf		
McCabe Union School District	\$4.08/sf		
Meadows Union School District	\$2.62/sf		
Central Union High School District	\$1.17/sf		

Sources: City of El Centro 2021; El Centro Elementary School District, 2021; McCabe Union School District, 2021; Meadows Union School District, 2021; and Central Union High School District, 2021.

Notes:

¹ Fees for residential use vary by the type of use and number of bedrooms.

Table 44 provides a fee worksheet for two prototypical housing projects based on applications processed in the City. Altogether, developer fees for a prototypical single-family dwelling total \$20,466 (approximately 8 percent of the total development cost). Fees for a prototypical multi-family project are somewhat lower on a per-unit basis at \$9,775 (approximately 10 percent of the total development cost).

Table 44: Development Fees for a Typical Unit

Fee Type	Single-Family	Multi-Family
Permit Processing Fees	\$2,895	\$574
Impact Fees	\$17,571	\$9,201
Total estimated fees per unit	\$20,466	\$9,775
Typical estimated cost of development per unit	\$262,266	\$94,061
Estimated proportion of fee cost to overall development cost per unit	7.80%	10.39%

Sources: City of El Centro, 2021.

Notes: Single-family prototype is a 3-bedroom, 1,810 square-foot home with 400 square-foot attached garage. Multi-family prototype is based on a 28-unit apartment complex with an average unit size is 966 square feet.

Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Development impact fees are required to provide essential services and infrastructure to serve new residents. Impact fees are governed by State law to demonstrate a nexus between development and potential impacts. State

law also requires the proportionality test to ensure the pro rata share of costs to provide services and infrastructure by individual developments is reasonable.

The City recognizes that planning/permitting and development fees add to the cost of residential development. To mitigate the impact of permitting and impact fees on the cost of residential development, the City will consider deferment of fees for affordable housing projects on a case-by-case basis.

E. Development Permit Procedures

The City reviews all applications for development to ensure the construction of projects that contribute in a positive manner to the community and improve quality of life. This section describes the permitting requirements, procedures, and timeframes for Site Plan Review, Conditional Use Permits (CUP), and Subdivisions. The City's permit processing procedures and processing times are in line with industry standards, provide development certainty, and do not unduly constrain the development of housing.

Site Plan Review

Site Plan Review applies to all projects involving two or more dwelling units on the same lot, second dwelling units, and developments that require a rezone. Site Plan Review does not apply to individual single-family dwellings proposed on existing legal lots. The purpose of Site Plan Review is to:

- Provide a process for the reviewing official or body to verify a proposed project's compliance with Zoning Ordinance development, design, and use standards;
- Assure land owners, business owners and developers that proposed uses, structures, and site improvements comply with the Zoning Ordinance provisions before preparation of plans for building permits; and
- Provide a means of streamlining the development review process through administrative review of development proposals.

As part of the Site Review Plan process (Figure 7), sites are evaluated by staff to ensure:

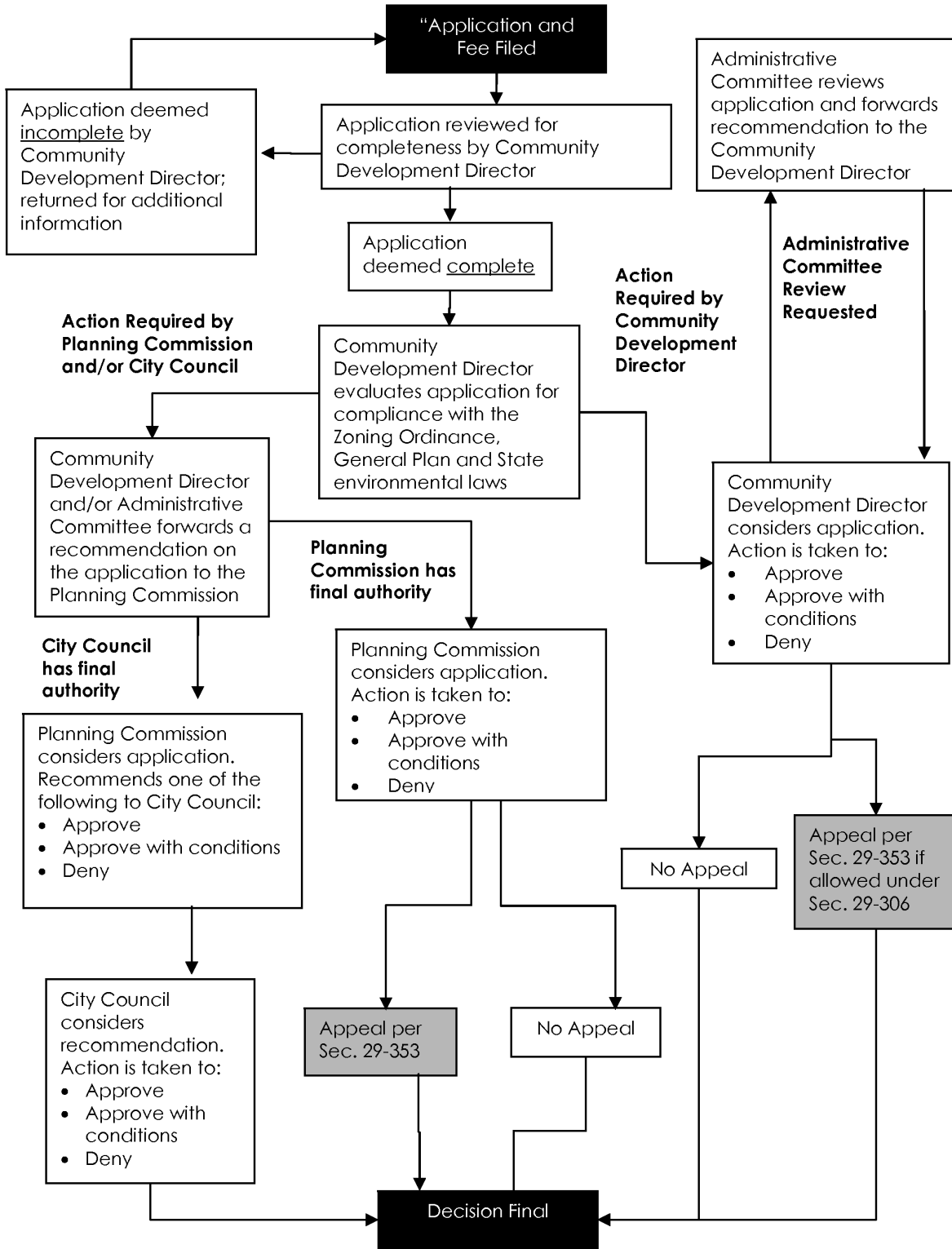
- Compliance with all provisions of the zoning code
- The following are arranged to avoid traffic congestion, protect pedestrian and vehicular safety, and avoid adverse effects on surrounding property:
 - Buildings, structures and improvements
 - Vehicular ingress, egress and internal circulation
 - Setbacks
 - Height of buildings
 - Location of service access
 - Walls
 - Landscaping
- Proposed lighting is arranged as to reflect the light away from adjoining properties
- Proposed signs will not interfere with traffic or limit visibility
- Compliance with state environmental laws

No findings are required as part of the Site Plan Review process.

Depending on the project and type of permit required, Site Plan Review is completed by the Community Development Director, and in limited cases by the City Council. The Community Development Director has authority to complete Site Plan Review for uses including two or more dwellings on a lot on all residential zoned properties. The Community Development Director's Site Plan Review is ministerial, and no noticing or public hearing is required. The Community Development Director's determination on a Site Plan Reviewed may be appealed to the Planning Commission for a final decision and the appeal is limited only to assertions that an error was made on the interpretation and application of the Zoning Ordinance requirements. Processing times for a Site Plan Review are five to six weeks.

For residential projects that require a change of zone and do not require any other discretionary approval, the City Council has the authority to approve, approve with conditions, or deny site plans for projects. Since the only residential Site Plan Review projects that are subject to City Council approval are related a Change of Zone, two public hearings are held -one before the Planning Commission and the second before the City Council. The City processes related Change of Zone and Site Plan Review applications simultaneously in order to reduce processing timeframes that range from six to eighteen months as they would require compliance with CEQA. However, with the recent General Plan update, one of the objectives is to provide a Land Use Policy that more accurately reflects the current and projected trends of development, such as including increased opportunities for mixed use and higher density residential development, and thereby, reducing the need to process zone change in the future.

Figure 7: Site Plan Review Procedure



Conditional Use Permits

Land uses that require a CUP generally have a unique and distinct impact on the area in which they are located or are capable of impacts to adjacent properties unless given special review and conditions. There have been seven CUP applications to construct new housing over the past seven years, and all have been approved. Depending on the use, CUP requests are heard by the Planning Commission and, where required by the zoning ordinance, the City Council. The City Council has final authority to approve conditional use permits for buildings or structures with heights greater than permitted by the zone, density bonuses, mobile home parks, planned unit developments, recreational vehicle parks, clustered single family development within the RAP zone at the maximum density permitted in the R1 zone so long as the average density within the portion(s) of the site designated "extended approach/departure zone" does not exceed one dwelling unit per net acre, and uses in the civic center zone that require a conditional use permit. The Planning Commission has the authority to approve conditional use permits for all other uses, although its decision may be appealed to the City Council.

The Planning Commission or City Council must make the following findings prior to approval of a CUP:

- The use applied for at the location set forth in the application is properly one for which a conditional use permit is authorized by the Zoning Ordinance;
- Said use is necessary or desirable for the development of the community, is in harmony with the various elements or objectives of the general plan, and is not detrimental to existing uses or uses specifically permitted in the zone in which the proposed use is to be located;
- The site for the intended use is adequate in size and shape to accommodate said use, and all yards, setbacks, walls or fences, landscaping and other features are required in order to adjust said use to those existing or permitted future uses on land in the neighborhood; and
- The site for the proposed use relates properly to streets and highways which are designed and improved to carry the type and quantity of traffic generated or to be generated by the proposed use.

The findings apply uniformly to all uses that require a CUP and conditions of approval must be deemed necessary to protect the public health, safety, and general welfare. CUPs that are subject to approval by the Planning Commission require one public hearing before the Planning Commission. Projects requiring a CUP from the City Council require two public hearings: one before the Planning Commission and a second before the City Council. Processing time for CUPs is between six to eight weeks.

Lot Line Adjustments

The City allows for ministerial lot line adjustments to facilitate the development of multi-family and mixed-use buildings across property lines, so long as the adjustment does not lead to an increase in the number of legal lots. The Community Development Director has authority to approve, conditionally approve, or deny the lot line adjustment within 15 days of receipt of a complete application. A lot line adjustment will be approved upon determination that the

adjustment plat meets the requirements of the Subdivision Ordinance and complies with the General Plan and Zoning Ordinance.

Subdivisions

The subdivision of land into multiple lots pursuant to the California Subdivision Map Act requires discretionary approval by the City. The Planning Commission can review and approve or recommend denial of tentative maps of four or fewer parcels. The Planning Commission also recommends approval, conditional approval, or denial of tentative maps of five or more parcels. The City Council has final authority to approve, conditionally approve, or deny all tentative maps of five or more lots or parcels; and to approve, conditionally approve or deny any tentative map of four or fewer parcels for which the Planning Commission recommended denial or an appeal has been made.

The reviewing and approving body must deny approval of a tentative map if it makes any of the following findings:

- That the proposed map is not consistent with the General Plan and applicable specific plans;
- That the design or improvement of the proposed subdivision is not consistent with the General Plan and applicable specific plans;
- That the site is not physically suitable for the type of development;
- That the site is not physically suitable for the proposed density of development;
- That the design of the subdivision or the proposed improvements is likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat;
- That the design of the subdivision or type of improvements is likely to cause serious public health problems; and
- That the design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of property within the proposed subdivision; provided, however, the city council may approve a map if it finds that alternate easements, for access or for use, will be provided, and that these will be substantially equivalent to ones previously acquired by the public.

Permit Processing Time Frames

Permit processing time frames vary depending on the type, location and environmental review requirements of the proposed development. Permits are generally processed more quickly than in other cities. A Site Plan Review has a typical processing time of five to six weeks. Projects that requires Planning Commission approval due to a CUP or parcel map, typically take six to eight weeks for processing. Building Plan Check approvals are relatively quick, with multi-family developments typically processed within six to eight weeks, and single-family homes and ADUs processed in as little as two weeks.

Projects that require only a Negative Declaration under CEQA can typically be processed in a six month time frame. Large subdivisions may require a longer processing time frame due to the

information required and public comments received. Projects requiring an Environmental Impact Report (EIR) will be able to use the General Plan EIR for tiering, which should reduce processing time. Processing time may vary due to the volume of applications, the type and number of changes made to the project by the applicant to address impacts, and the size and complexity of the projects.

F. Building Codes

The City of El Centro adopted the 2016 edition of the following California Building Standards Codes, which is a compilation of specialty codes: Building Code, Residential Code, Electrical Code, Mechanical Code, Plumbing Code, Energy Code, Historical Building Code, Existing Building Code, and Green Building Standards Code. The City also adopted the 2010 edition of the Uniform Administration Code and Uniform Housing Code. These codes establish minimum standards for residential construction and are structured to be the minimum necessary to protect the public health, safety, and welfare, while not unduly constraining the development of housing. The codes are determined by the International Conference of Building Officials and the state. Some of the codes have been adopted with minor administrative amendments; no local amendment to the code has either been initiated or approved that directly impacts housing standards or processes. The City will adopt the 2019 version of the building codes.

Code enforcement is conducted by the Code Enforcement Division of the Community Development Department and is based upon systematic enforcement in areas of concern and on a complaint basis throughout the City. The Code Enforcement Division works with property owners and renters to assist in meeting state health and safety codes. If a violation relates to residential rehabilitation, CDBG funds are available to help defer the cost of housing rehabilitation.

G. Transparency in Development Process

To increase transparency and certainty in the development application process as required by law, the City has links to its zoning and development standards and fee schedule posted on its website. Currently, the City has no inclusionary requirements.

- Links to the zoning maps can be found here:
<http://www.cityofelcentro.org/communitydevelopment/index.asp?m=1&page=67&subpage=26>.
- Links to development standards and allowed uses can be found here:
https://library.municode.com/ca/el_centro/codes/code_of_ordinances?nodeId=CHC_OTA_CH29ZO_ARTIIZO_DIV2REZO
- Fee schedule can be found here:
<http://www.cityofelcentro.org/communitydevelopment/index.asp?m=1&page=67&subpage=24>

H. Housing for People with Disabilities

Persons with disabilities have a number of specific housing needs, including those related to design and location. Design needs generally include the removal of architectural barriers that limit the accessibility of dwelling units and construction of wheelchair ramps, railings, etc. Location needs include accessibility to public transportation, commercial services, healthcare, and supportive services. Some persons with disabilities need group housing opportunities, especially those who are lower income or homeless.

California statutes require that the Housing Element include an analysis of the Zoning Ordinance, permitting procedures, development standards, building codes, and permit processing fees to identify potential constraints for housing for persons with disabilities. The following discussion addresses these issues and determines that no specific City policy or regulation serves to impede the access that persons with disabilities have to housing that suits their specific needs.

Zoning and Land Use

The Lanterman Development Disabilities Service Act (Sections 5115 and 5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer people with disabilities is a residential use for the purposes of zoning. As discussed earlier in this Chapter, State-authorized or certified residential care facilities, family care home, foster home, or group home serving six or fewer people with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is permitted in all zones that allow residential uses, subject to the same application process and development standards as other types of housing in the same zones.

In addition to residential care facilities, the City encourages and facilitates group dwellings and supportive housing. Group dwellings are permitted in the R3 zone and supportive housing is permitted in all residential zones. Group dwellings and supportive housing can be important sources of affordable housing for persons with disabilities. Supportive housing is permitted with a conditional use permit in the CT zone. Group care facilities are permitted with a conditional use permit in the CT, CO, and CH zones.

Building Codes

The City enforces Title 24 of the California Code of Regulations that regulates the access and adaptability of buildings to accommodate people with disabilities. Government Code Section 12955.1 requires that ten percent of the total dwelling units in multi-family buildings without elevators consisting of three or more rental units or four or more condominium units be subject to the following building standards for people with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- At least one powder room or bathroom shall be located on the primary entry level served by an accessible route.

- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include but are not limited to kitchens, powder rooms, bathrooms or hallways.
- Common use areas shall be accessible.
- In common tenant parking is provided, accessible parking spaces are required.

No unique Building Code restrictions are in place that would constrain the development of housing for people with disabilities. Compliance with provisions of the City's Municipal Code, California Code of Regulations, California Building Standards Code, and federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building & Safety Division of the Community Development as part of the building permit submittal.

Definition of Family

Local governments may restrict access to housing for households failing to qualify as a "family" by the definition specified in the Zoning Ordinance. Specifically, a restrictive definition of "family" that could be interpreted to limit the number of or differentiates between related and unrelated individuals living together may illegally limit the development and siting of group homes for people with disabilities, but not for housing families that are similarly sized or situated. Another potentially restrictive definition could limit use of residential land uses for facilities that serve special needs populations, including people with disabilities.

The City defines "family" as "two or more individuals related by birth, marriage, adoption or convenience who occupy the same dwelling unit. A family also includes the residents of residential care facilities and group homes for people with disabilities. A family does not include larger institutional group living situations such as dormitories, fraternities, sororities, monasteries or nunneries, nor does it include such commercial group living arrangements as boardinghouses, lodging houses and farm labor camps." The City's definition does not constrain or limit housing opportunities for the disabled because this definition explicitly includes residential care facilities and group homes for people with disabilities.

Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a particular modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.

Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. The City's Reasonable Accommodation Ordinance grants the City's Administrative Committee authority to review and decide applications for reasonable accommodation as provided by the federal Fair Housing Amendments Act and California's Fair Employment and Housing Act to allow reasonable remedy from zoning standards for individuals with physical or mental impairment. A request for reasonable accommodation may include a

modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

The Ordinance directs the Administrative Committee to approve the accommodation if it is necessary to make housing available to an individual in accordance with the fair housing acts, unless the Committee can present evidence that doing so would either create an undue financial or administrative burden or result in a fundamental alteration of the Zoning Ordinance. The Zoning Ordinance defines “fundamental alteration” as an alteration so far reaching that it would change the essential scheme of the Zoning Ordinance. Requests for reasonable accommodation are approved administratively with no required fee. There has been one reasonable accommodation request since 2015.

3.3. Public Policy Constraints

State and Federal requirements may act as a barrier to the development or rehabilitation of housing, and affordable housing in particular.

A. State Prevailing Wage Requirements

The State Department of Industrial Relations (DIR) expanded the kinds of projects that require the payment of prevailing wages. Labor Code Section 1720, which applies prevailing wage rates to public works of over \$1,000, now defines public works to mean construction, alteration, installation, demolition, or repair work done under contract and paid for in whole or in part out of public funds. For example, public transfer of an asset for less than fair market value, such as a land write-down, would now be construed to be paid for, in part, out of public funds and trigger prevailing wage requirements.

While the cost differential in prevailing and standard wages varies based on the skill level of the occupation, prevailing wages tend to add to the overall cost of development. In the case of affordable housing projects, prevailing wage requirements could effectively reduce the number of affordable units that can be achieved with public subsidies. The following types of projects are exempt from the prevailing wage requirement:

- Residential projects financed through issuance of bonds that receive an allocation through the State; and
- Single-family projects financed through issuance of qualified mortgage revenue bonds or mortgage credit certificates.

B. Environmental Protection

State law (California Environmental Quality Act, California Endangered Species Act) and federal law (National Environmental Protection Act, Federal Endangered Species Act) regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs resulting from the environmental review process are also added to the cost of housing and are passed on to the consumer to the extent that the market can bear. These costs include fees charged by local government and private consultants needed to complete the environmental analysis, costs to mitigate impacts, and costs from delays caused by the mandated public review periods. However, the presence of these regulations helps preserve the environment and ensure environmental safety to El Centro residents.

3.4. Utility and Public Service Constraints

The provision of utilities such as water and sewer as well as public services including police, fire, and schools is costly to local governments and special districts providing municipal services. New development must pay for much of these costs thereby increasing the overall cost of housing. This section provides an overview of potential utility and public service constraints in El Centro.

A. Water Supply

The City Public Works Department receives and distributes potable water from the Imperial Irrigation District (IID). The IID has senior water rights to the Colorado River water and ranks urban supply higher than the agricultural supply. The City's draft 2020 Urban Water Management Plan reviewed the overall supply and demand of water for the City of El Centro determined that "[g]iven that 100 percent of the City's demand is met through Colorado River water purchased from IID, and given the extreme reliability of that water source, IID will be able to meet El Centro's demands in all projected years through 2045." The water demand projected in the Urban Water Management Plan included development pursuant to the City's General Plan and there is adequate water supply and filtration capacity to accommodate 3,433 new residential dwellings during the 2021-2029 RHNA period. The City charges a water capacity fee that goes toward improvement/expansion of potable water filtration and distribution facilities maintained by the Public Works Department.

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. Although the City relies on the IID for its water supply, the Public Works Department is responsible for providing local service to existing and new development. Therefore, the City is responsible for complying with Senate Bill 1087 requirements should supply rationing or limited filtration capacity occur. To ensure compliance, the City will develop and establish a formal procedure to grant water priority to developments with units affordable to lower-income households pursuant to Government Code Section 65589.7

B. Wastewater Treatment

The City owns and operates a wastewater collection system and treatment facility that receives wastewater from the entire city and a few entities outside of the City Limits. The facility underwent a significant upgrade in the mid-1990s, increasing its capacity to eight million gallons per day (mgd).

The City's Public Works Department is planning large wastewater capital improvements over the next five fiscal years. These improvements will both increase the capacity of the collection and treatment systems to support the City's growth and to repair, replace, and improve existing facilities to continue to reliably serve existing customers. A portion of the City's wastewater connection and monthly service fees is allocated to a Wastewater Capacity Fee Fund, which is used to finance capital projects associated with growth anticipated in the 2008 Wastewater Master Plan and Capital Improvements Plan. These plans were developed and are implemented based on General Plan Land Uses and in conjunction with the Urban Development Program. Implementation of these plans and programs will ensure that adequate wastewater collection and treatment facilities are in place to serve existing and planned growth, including the City's 2021-2029 RHNA of 3,433 units. The City charges a sewer capacity fee to offset the cost of improving and expanding wastewater collection and treatment facilities.

Senate Bill 1087 described above also mandates priority wastewater collection and treatment service to housing developments providing units affordable to lower income households. The City is responsible for complying with Senate Bill 1087 requirements should limited wastewater treatment capacity force a moratorium on new development or rationing new sewer connections. To ensure compliance, the City will develop and establish a formal procedure to grant wastewater service priority to developments with units affordable to lower-income households pursuant to Government Code Section 65589.7

C. Urban Development Program

El Centro has adopted an Urban Development Program to facilitate residential, industrial, and business growth in areas where public services are available and to provide a variety of growth locations so that an adequate supply of developable land will maintain reasonable housing costs and promote economic development. Specific geographic areas (referred to as "Development Tiers") have been delineated for new development based on existing or planned public facilities, existing land use, and transportation corridors or other physical barriers:

- Development Tier I - Current Urban Service Area: Includes land within and adjacent to the present City limits. In most cases, new development within this area can be served by gravity sewer lines to existing trunk sewers. Generally, water lines and reservoirs are also adequate to serve new development; however, easements and financial contributions to improve the ultimate sewer and water systems may be required. Fire, police, schools, parks, library, medical, roads, and other City services are also in proximity to these areas, though service capacities are likely to be limited and improvements to existing facilities and/or new facilities may be needed to adequately accommodate new development.

Subdivisions of land and commercial or industrial development within this area would generally follow standard zoning, subdivision, and environmental review procedures and would not require a Community Facilities Study.

- Development Tier II - Planned Urban Service Area: Includes land both within and adjacent to the City limits, but differs from Development Tier I in that public infrastructure to serve new development is more limited. Essential required improvements may include sewer and water pump stations, water storage reservoirs, and sewer trunk lines or force mains. New schools, parks, roadway improvements, and fire stations may also be required to adequately serve development of Development Tier II areas. As with Development Tier I areas, additional service capacity for police, library, medical, and other City services may also be needed to accommodate new development. Preparation of a Community Facilities Study may be required for development projects within Development Tier II areas.
- Development Tier III - Future Urban Service Area: Encompasses unincorporated lands that are not anticipated to be developed for at least ten years.

All of but one site included in the Residential Sites Inventory (Appendix C: Sites Inventory) are located within Development Tier I - Current Urban Service Area. A large single-family tract is in Development Tier II and will require the installation of infrastructure to serve new development. However, this is consistent with the majority of single-family tract development in the City. The Urban Development Program is designed and implemented to encourage and facilitate the orderly and efficient provision of utilities and public services concurrent with anticipated growth and is therefore not considered a constraint on residential development.

3.5. Environmental Constraints

A community's environmental setting affects the feasibility and cost of developing housing. Environmental issues range from the conservation of biological resources to the suitability of land for development due to potential exposure to environmental hazards. This section summarizes potential biological and seismic constraints on residential development in El Centro. None of the properties identified in the residential sites inventory are known to be constrained by steep slopes, floodplains, or hazardous materials.

A. Biological Resources

The irrigation and drainage canals network within some portions of the City provides habitat for saline adapted plant species. Populations of a number of fish species live in the canals. The mosquito fish has been introduced by the Imperial County Health Department for mosquito control, and species of Tilapia have been introduced to control aquatic weeds. The canal system has created an aquatic habitat within a naturally arid environment and provides opportunities for people to fish and observe wild species in a unique manmade "natural" environment. Although the City must assess development proposals for potential impacts to significant natural resources and habitat pursuant to the California Environmental Quality Act (CEQA), the canal system right-of-way is well defined and related biological resources will not be a significant constraint on residential development within the 2021-2029 RHNA period.

B. Seismic Hazards

The Imperial Valley is one of the most tectonically active regions in the United States. Branches of the San Andreas Fault form the eastern boundary of the basin (Salton Trough) and the western edge is defined by the San Jacinto-Coyote Creek and the Elsinore-Laguna Salada Faults. More small to moderate earthquakes have occurred in the area than along any other section of the San Andreas Fault System. Since the City is generally flat, landslides are not considered a major hazard. However, bluff failure and mudslides may occur along slopes and embankments of the rivers and canals. Standard engineering practices, including soils investigation and compaction techniques, are sufficient to mitigate most seismic hazards in the City. Seismic hazards should not be a significant constraint to the development of housing in El Centro.

4. Housing Resources

This section of the Housing Element addresses the resources available to the City in implementing the goals, policies, and programs contained in this Housing Element, specifically regarding the potential for future residential development. Resources covered in this section include potential development sites, financial resources, and administrative resources.

4.1. Future Housing Needs

State law requires each community to play a role in meeting the region’s housing needs. As such, the Southern California Association of Governments (SCAG), as the regional planning agency, is responsible for allocating the Regional Housing Needs Allocation (RHNA) to individual jurisdictions within the region. SCAG has allocated the City of El Centro housing production goals for the 6th cycle Housing Element update. This section discusses how El Centro has adequate existing residential site capacity to accommodate its share of regional housing needs during the planning period.

A. Regional Housing Needs Allocation (RHNA)

State Housing Element law requires that a local jurisdiction accommodate a share of the region’s projected housing needs for the planning period. This share, called the RHNA, is important because State law mandates that a jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction’s ability in providing adequate land with adequate density and appropriate development standards to accommodate the RHNA.

SCAG assigned a RHNA of 3,442 units to the City of El Centro for the 2021-2029 RHNA period. This allocation is distributed into four income categories, as shown below, in the following income distribution:

- Extremely Low/Very Low Income: 1,001 units
- Low Income: 490 units
- Moderate Income: 462 units
- Above Moderate Income: 1,489 units

The City has a RHNA allocation of 1,001 very low income units (inclusive of extremely low income units). Pursuant to AB 2634, the City must project the number of extremely low income housing needs based on Census income distribution or assume 50 percent of the very low income units as extremely low. Assuming an even split, the City’s RHNA allocation of 1,001 very low income units may be divided into 501 very low and 500 extremely low income units. However, for purposes of identifying adequate sites for the RHNA, State law does not mandate the separate accounting for the extremely low income category.

The RHNA includes a fair share adjustment which allocates future (construction) need by each income category in a way that meets the State mandate to reduce over-concentration of lower

income households in historically lower income communities or areas within the region. The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.

B. Credits Toward the RHNA

The 6th cycle RHNA covers a planning period that starts on June 30, 2021. Housing units built, under construction, or approved June 30, 2021 onward, can be credited toward meeting the City’s RHNA. These units can be subtracted from the City’s share of regional housing needs. The City must demonstrate in this Housing Element its ability to meet the remaining housing needs, through the provision of sites, after subtracting units under construction or anticipated (pipeline projects). These projects are identified in Table 45.

Units Approved

As of July 1, 2021, the City has entitled a total of 574 single-family lots in one subdivision; building permits have not been issued. Single-family lots are only considered affordable to above-moderate households.

Units Pending Approval

As of July 1, 2021, a total of 180 units (the fourth phase of an apartment development) were in the approval process. Apartment units are considered affordable to moderate income households based on rent levels in the City (see discussions in previous sections).

Remaining Housing Need to be Accommodated

After accounting for units approved and pending approval, a remaining need of 2,688 units exists. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units by October 15, 2029.

Table 45: Credits Toward RHNA

	Unit Type	Very Low	Low	Moderate	Above Moderate	Total
RHNA		1,001	490	462	1,489	3,442
Net Units Entitled (Building Permits Not Issued) as of 7/1/2021						
S. La Broucherie Rd./Wake Ave. – Approved subdivision with 574 SFR lots; no permits issued	SF	---	---	---	574	574
Subtotal:		0	0	0	574	574
Net Units Pending Approval as of 7/1/2021						
Bradshaw Ave./10 th Ave.	Apartments	---	---	180	---	180
Subtotal:		0	0	180	0	180
Remaining RHNA		1,001	490	282	915	2,688

The 180 units from the Bradshaw Avenue Apartments are considered moderate based on the rent information provided by the developer. Rental rates for a two-bedroom two-bathroom apartment

ranges from \$1,500 to \$1,600, which is considered within the moderate affordability range for a three-person household (see **Table 29**).

C. Future Residential Development Potential

The City of El Centro has adequate land capacity to meet the needs of all income groups through the 2021-2029 RHNA period. The City recently completed a comprehensive update of its Land Use Element as part of a General Plan update, that also included updating the Mobility Element and preparing a new Environmental justice Element, which was adopted by the City Council on June 15, 2021. Consideration was given to accommodating the City’s required 6th Cycle RHNA as a part of the update process. According to the Program Environmental Impact Report (PEIR) that was prepared for the General Plan update, the residential development capacity of the updated Land Use Element is estimated at 20,770 at build-out (as shown in Table 46).

Table 46: El Centro General Plan Update Residential Development Capacity

Land Use Designations	Number of Dwelling Units (within the City)
Rural Residential	12
Low Density Residential	9,083
Medium Density Residential	2,509
High Density Residential	6,552
Mixed Use 1	995
Mixed Use 2 Overlay	1,619
Total:	20,770

Source: El Centro General Plan EIR, June 2021, SCH No. 2020070349

The Mixed Use 1 (MU-1) and Mixed Use 2 (MU-2) Overlay land use designations are new designations created for the Land Use Element update. Both of these designations provide new opportunities for new multi-family residential opportunities, either as stand-alone residential developments or as part of mixed use projects, in areas that are on or near key commercial corridors in proximity to transit, existing and proposed pedestrian and bicycle paths, and shopping and other services. These two new mixed use designations were applied to former commercial land use designations to facilitate the trend the City has experienced, whereby developers have been applying and receiving approval for discretionary permits to change commercially designated/zoned property to the High-Medium Residential land use designation/R-3 zone to allow multi-family residential projects. In fact, the City has not had a request for a new commercial project in nearly 15 years in the Adams Avenue proposed mixed use area. The planned mixed use area around the IV Mall has had only two commercial new development in the last 15 years; a hotel in 2015 and medical office building in 2019..

The updated Land Use Element also redesignates the majority of Rural Residential properties to Low density and Medium density residential land use designations to provide increased opportunities for moderate and above moderate income households. Descriptions of the land use designations are provided in the **Realistic Capacity Assumptions** section below.

The total residential capacity shown in Table 46 (above) represents buildout of the General Plan over the course of 20+ years. The capacity identified in the Residential Sites Inventory (Table 48, below), identifies the sites with near-term development potential through the City's newly adopted policy of expanding the range of housing types within El Centro to accommodate a wider range of household types and income levels.

The following is a summary of the detailed parcel data included in Appendix C: Sites Inventory.

Realistic Capacity Assumptions

Consistent with the regional trends shown earlier in the Housing Constraints section, multi-family construction has been relatively limited in El Centro. For purposes of calculating the realistic capacity of sites in Appendix C: Sites Inventory, the following density factors were used to determine the realistic capacity of sites identified to meet the City's RHNA:

- **High-Medium Density Residential/R3 (maximum 25.0 units per acre):** A density factor of 19.0 units per acre represents the realistic capacity of development within this land use designation/zone. This factor is only 76 percent of the maximum allowable density and is consistent with recent development applications. Four recent projects demonstrate that this is a realistic capacity assumption. Girasol Apartments, a 56-unit project, is currently under construction at a density of 23.5 du/ac. Amigo Ent. Apartments, a four-unit project, was constructed at 20 du/ac, while RSG Capital Apartments, a six-unit project, was recently constructed at 30 du/ac. Finally, Vaszques Apartments, a three-unit project, was recently constructed at 23 du/ac. This demonstrates that the density factor of 19 du/ac is not only achievable, but is a conservative estimate and is applicable to both small and medium sized lots.
- **Tourist Commercial/CT (maximum density set by FAR):** A density factor of 19.0 units per acre is reasonable given the City's demonstrated High-Medium Density Residential/R3 sites identified above, which is typical of residential developments constructed in the CT zone.
- **Medium Density Residential/R2 (maximum 12.0 units per acre):** A density factor of 8.0 units per acre represents 67 percent of the maximum allowable density and is consistent with historic development patterns, including a five-unit project at 12 du/ac that is currently under construction, and a 240-unit project (Town Center Village III) at 12 du/ac, that was recently constructed.
- **Low Density Residential/R1 (maximum 6.0 units per acre):** A density factor of 3.5 units per acre represents 58 percent of the maximum allowable density and is consistent with historic development patterns, including a 23-unit subdivision (Santa Fe subdivision, currently under construction), which was developed at 6.38 du/ac, and a 22-unit subdivision (Lotus Ranch subdivision, currently under construction), that was developed at four du/ac.
- **Rural Residential/RR (maximum 2.0 units per acre):** A density factor of 1.0 unit per acre represents 50 percent of the maximum allowable density and is consistent with historic development patterns. There is very little RR land left in the city, and the recently updated

Land Use Element redesigned the majority to land use designations with higher densities, so this 50 percent capacity assumption is assumed to be reasonable.

- **Mixed Use 1 (MU-1)/Zone to be created (minimum 12.0 units per acre to maximum 25.0 units per acre; maximum 32 units per acre for senior projects):** Mixed Use 1 is a new land use designation in the recently updated Land Use Element (June 2021). It allows mixed use, stand-alone multi-family residential, and stand-alone commercial. Since this is a new land use designation and the zone has not been created yet, there are no representative projects to demonstrate actual capacity; therefore, the City proposes to use the density factor of 19, which is consistent with the High-Medium Density Residential/R3 land use designation and zone and has the same maximum density. The MU-1 designated sites in the 2021-2029 Sites Inventory are located on Adams Avenue. The portion of Adams Avenue that has been redesignated to MU-1 was identified as an Opportunity Area (OA-1) in the Land Use Element. As a corridor with many older commercial properties, it was identified as a corridor both in need of revitalization and an area that offers significant opportunities to provide a variety of new housing types and neighborhood commercial uses. This corridor has recently experienced redevelopment of several older motels into affordable dwelling units, a trend that the new MU-1 designation acknowledges and promotes. The MU-1 land designation and proposed zone allow both mixed use and stand-alone residential. The trend in the city over the past several years has been for developers to redesignate and rezone property from commercial to multi-family residential; because of this trend, the City assumes these vacant properties identified in the sites inventory will develop as 100 percent residential. Another demonstration of this trend is that several properties within the MU-1 designation have recycled from 100 percent commercial to 100 percent residential uses in the past several years. City staff indicate that developers typically express interest in developing 100 percent housing rather than mixed use, and one developer who constructed a traditional vertical mixed use on a large lot in another city has indicated to staff that it did not perform well and therefore he is now interested in building 100 percent residential use, particularly apartments in this area.

Other large parcels to the north of the MU-1 designation have been rezoned from commercial to residential uses. The reason the sites were redesignated mixed use and not strictly residential is to retain legal conforming status of the existing commercial uses. The decision to redesignate the Adams Avenue corridor to mixed use instead of multi-family residential was to preserve existing commercial uses as legal conforming and retain a mixed use corridor to provide goods and services within proximity to existing and new households. The MU-1 designation also applies to an area of the City that is not within the Sites Inventory because it currently lacks infrastructure; however, the City expects this area to become available for development within the 6th Cycle planning period.

- **Mixed Use 2 Overlay (MU-2 Overlay)/Overlay Zone to be created (minimum 21.0 units per acre to maximum 30.0 units per acre; maximum 38 units per acre for senior projects):** The Mixed Use 2 Overlay is a new land use designation in the recently updated Land Use Element (June 2021). It allows mixed use, stand-alone multi-family residential, and stand-alone commercial. The density is the highest allowed in El Centro, which provides enhanced opportunities for multi-family housing that is affordable to lower income households. Since this is a new land use designation and the zone has not been created yet, there are no representative projects to demonstrate actual capacity; therefore, the City proposes to use the density factor of 21, which is the lowest density allowed by the land

use designation. The MU-2 Overlay land designation and proposed zone allow mixed use allows stand-alone residential. This supports the trend in the City over the past several years for developers to redesignate and rezone property from commercial to multi-family residential; therefore the City assumes these vacant properties identified in the sites inventory will develop as 100 percent residential. This assumption was corroborated by talking to a representative of the Imperial Valley Mall. The IV Mall currently has vacancies within the mall and vacant pads adjacent to the mall. The property owner indicated that a mixed use overlay that would allow stand-alone (100 percent) residential would be beneficial because demand for commercial “brick-and-mortar” stores is declining and adding residential to commercial projects provides new shoppers who will support the existing retailers. The property owner indicated that other malls that are owned by the IV Mall parent company have already added stand-alone residential projects on mall sites in Texas.

The MU-2 Overlay designated sites in the 2021-2029 Sites Inventory are located in two areas. The first area includes two vacant parcels in the northwest corner of El Centro, located within proximity to the City’s main commercial area and near Imperial Avenue (SR 78), which is served by transit and a proposed pedestrian/bikeway path.

The second area is located in the southeast corner of El Centro, at and around the Imperial Valley Mall (IVM) and nearby shopping areas, in an area designated as Opportunity Area 4 (OA-4) in the Land Use Element. The intent of OA-4 is to promote an integrated mixed use activity center by introducing and encouraging multi-family residential units to locate within and near the established commercial area. This could occur on vacant pads around the mall and on vacant portions of adjacent property also owned by the IVM. Discussions with a representative for the IVM indicate that this is a desirable addition to the land use mix and that other mall properties owned by the IVM are already incorporating multi-family residential units into their developments. This area is also served by transit and by a proposed pedestrian/bicycle pathway.

Table 47: Average Density for Multi-Family Housing

Project	Max Allowed Density	Acreage	Units	Density Achieved	% Density Realized	Density Assumed
R3 Project	25	2.2	48	21.8	87.2%	
Las Brisas	25	4.0	72	18.0	72.0%	
R3 Trends/Average		6.2	120	19.4	77.6%	19

Stakeholder meetings with market-rate and non-profit developers did not indicate any concern over the City’s existing development standards, nor the ability to achieve maximum densities. The City is not constraining maximum density – developers often choose to develop at a lower density, but it is not because of governmental constraints. The City is already initiating the implementation plan for the Housing Element program, including the preparation of the MU-1 zone and MU-2 overlay zone and associated development standards. The standards will be formulated such that developers can achieve the maximum allowable density.

Affordability, Suitability, and Availability Analysis

This subsection describes the assumptions applied to each parcel in Appendix C: Sites Inventory to determine affordability level and establish the suitability and availability for development within the 2021-2029 RHNA period.

Lower Income

Zones in El Centro that allow at least 20 dwelling units per acre are considered sufficient to accommodate housing that is affordable to lower income households “by default” per Government Code Section 65583.2(c)(3)(B). The City’s R3 zone allows up to 25 units per acre and therefore meets this default affordability density threshold. The City’s CT zone, which allows mixed use and multi-family residential with a Conditional Use Permit, also meets this default affordability density threshold because at least 20 units per acre are achievable given the maximum allowable FAR of 1.0 and development history. As described in the previous section, the City has added a new MU-2 Overlay designation to the Land Use Element since the last Housing Element update, which requires the creation of a new zone to implement it (see Program 1). The zone created to implement the MU-2 Overlay will allow a minimum of 21 dwelling units per acre with a maximum density of up to 30 dwelling units per acre, which meets the default density – in fact, the minimum allowed density exceeds the default density.

The City has identified 36 High-Medium Density Residential, Tourist Commercial, and Mixed Use 2 Overlay parcels or properties covering 105.25 acres that are vacant and available for development in the planning period. These parcels can accommodate at least 1,883 lower income units assuming a density factor of between 19.0 and 21.0 dwelling units per acre. Each site is larger than 0.50 acre and the average parcel size is 2.92 acres. Although two sites are larger than 10 acres, there has been expressed interest from developers for residential development.

Moderate Income

As described previously, the City has added the MU-1 designation to the Land Use Element since the last Housing Element update, which requires the creation of a new zone to implement it. A total of 2.47 acres on five parcels that are designated MU-1 are vacant and available to accommodate at least 47 moderate income units within the RHNA period. Another 25.57 acres on 50 parcels in the R3 and R2 zones (including two City-owned parcels) are vacant and available to accommodate at least 396 moderate income units within the RHNA period. The average size of the parcels identified to accommodate the moderate income RHNA is 0.51 acre. Based on the real estate market data presented in Section 2.7 of this Housing Element, it is reasonable to assume that new multi-family construction on relatively smaller R3, R2, CD, CT, and MU-1 sites will be offered at market prices that are affordable to moderate income households.

Above Moderate Income

El Centro’s remaining RHNA for above moderate income households will be accommodated on 386.5 acres consisting of 72 parcels zoned for lower density residential (R1 and RR). These sites are suitable to accommodate at least 1,529 single-family units. This is in addition to the already approved projects that did not have permits issued prior to July 1, 2021. New construction on these sites is assumed to produce units that are affordable to above moderate income households.

Public Services and Infrastructure Availability

El Centro has adopted an Urban Development Program to facilitate residential, industrial, and business growth in those areas where public services are available and to provide a variety of growth locations so that an adequate supply of developable land will maintain reasonable housing costs and promote economic development. While the majority of property within the City boundary has access to utilities, there are exceptions. To identify those areas that will require more extensive planning, ensuring the provision of adequate levels of public services and facilities, the undeveloped portion of the Planning Area has been divided into three development tier areas – Tier I, Tier II, and Tier III.

All lower income and moderate income sites are served by utilities. Several of the above-moderate income sites are located in the Tier I Growth Area. New development within the Tier I Growth Area can be served by gravity sewer lines to existing trunk sewers. Generally, water lines and reservoirs are also adequate to serve new development; however, easements and financial contributions to improve the ultimate sewer and water systems may be required. Fire, police, schools, parks, library, medical, roads, and other City facilities and services also are in proximity to these areas, though service capacities are likely to be limited and improvements to existing facilities and/or new facilities may be needed to adequately accommodate new development. Subdivisions of land and commercial, industrial, and mixed use development within Tier I generally would follow standard zoning, subdivision, and environmental review procedures. As discussed in detail in Section 3.4.C of this Housing Element, Tier I is the “Current Urban Service Area” and no significant public service or infrastructure constraints have been identified.

Adequacy of Sites to Meet the City’s RHNA

Table 48 summarizes the City’s accommodation of the RHNA for all income groups by General Plan Land Use Designation.

General Plan Land Use Designation	Lower Income	Moderate Income	Above Moderate Income	Total
Low Density Residential	---	---	1,061	1,061
Medium Density Residential	---	61	437	498
High-Medium Density Residential	633	331	---	964
Mixed Use 1	---	45	---	45
Mixed Use 2 Overlay	874	---	---	874
Tourist Commercial	375	---	---	375
Neighborhood Commercial	21	---	---	21
Total	1,963	437	1,498	3,838

Table 49 summarizes the City’s accommodation of the RHNA for all income groups during the 2021-2029 RHNA period. After accounting for the realistic capacity of vacant sites, the City has identified capacity of at 3,838 units for the RHNA period, including a surplus of 1,150 units.

Table 49: Adequacy of Sites to Accommodate the 2021-2029 RHNA

Income	RHNA	Entitled/ Pending	Pipeline Projects	Sites	Surplus	% Surplus
Very Low (<50% AMI)	1,491	---	---	1,883	392	26%
Low (51-80% AMI)						
Moderate (81%-120% AMI)	462	---	180	443	161	35%
Above Moderate (>120% AMI)	1,489	574	---	1,498	583	39%
Total	3,442	574	180	3,924	1,136	33%

4.2. Financial Resources

The State’s dissolution of the El Centro’s redevelopment agency in 2012 eliminated the City’s primary source of affordable housing funding. Other funding resources available for affordable housing development are highly limited. These other financial resources include private contributions (including foundations or trusts), semi-public agencies and federal and state agencies. Listed below are some typical sources of funds used for affordable housing:

- State of California, Department of Housing and Community Development loan and grant programs
- California Housing Finance Agency financial assistance programs
- Federal/State Low Income Housing Tax Credits (LIHTC)
- Rural Housing Administration (Farmers Home Administration or FHA) Programs
- U.S. Department of Housing and Urban Development (HUD) Programs

The City of El Centro is an entitlement jurisdiction under the HUD Community Development Block Grant (CDBG) program. For FY 2021, the City received an allocation of approximately \$558,074 for a range of housing and community development activities. Specifically, the City has used CDBG funds to address lead-based paint and asbestos hazard abatements, as to provide public services in the areas of fair housing, senior services, families affected by domestic violence through visitation assistance, homeless shelter, and homeless assistance through local non-profit agencies. The City also used CDBG funds for Code Enforcement program, which consists of conducting inspections for code violations and enforcement of state and/or local codes.

4.3. Administrative Resources

The City collaborates with various agencies, developers, and organizations to provide affordable housing and supportive services for lower and moderate income households and households with special needs. Key agencies, developers, and organizations include:

- **Imperial Valley Housing Authority:** The Housing Authority administers the Housing Choice Voucher program in the Imperial Valley, including El Centro. The Housing Authority also owns and operates public housing located throughout the County, with units for seniors, farm workers, and the disabled in El Centro.
- **Imperial County Regional Task Force on Homelessness:** The Task Force serves as the lead agency for Imperial County homeless issues. The City will continue to participate in activities and outreach conducted by the Task Force.

- **California Coalition for Rural Housing:** The California Coalition for Rural Housing (CCRH) is a statewide nonprofit organization that works to ensure affordable housing opportunities for low-income households in California. CCRH supports the production and preservation of decent, safe, and low-cost housing for rural and low-income Californians. Supporters include nonprofit housing agencies, lending institutions, community advocacy organizations, consumer members, and local government officials. The Coalition advocates for housing at all levels of government before legislative and regulatory bodies. It also provides technical and organizational assistance to community groups and nonprofit agencies and educates the public on housing issues.
- **Affordable Housing Developers:** The City collaborates with a number of affordable housing developers and service providers to accommodate the housing needs of El Centro residents. The following are some of the housing developers and service providers active in southern California; several are included in the State’s list of entities with the legal and managerial capacity to acquire and manage at-risk projects: AMG, Affirmed Housing Group, Bridge Housing, Jamboree Housing, and Chelsea Investment Group.
- **Supportive Services:** Various non-profit groups that provide supportive services to the special needs population in El Centro. Some of the key groups operating in Imperial Valley include the Center for Family Solutions, Imperial County Family Resource Center, Campesinos Unidos, Catholic Charities, Independent Living Center, Neighborhood House, and Veteran Services.

4.4. Opportunities for Energy Conservation

Two basic and interrelated approaches to creating energy conservation opportunities in residences are conservation and development:

- **Conservation:** Conservation can be accomplished by reducing the use of energy-consuming items, or by physically modifying existing structures and land uses. The California Energy Commission first adopted energy conservation standards for new construction in 1978. These standards, contained in Title 24 of the California Administrative Code, contain specifications relating to insulation, glazing, heating and cooling systems, water heaters, swimming pool heaters, and several other items.
- **Development:** Solar energy is a viable alternate energy source for the City of El Centro. Two basic types of solar systems exist: active and passive. In passive solar systems, the structure itself is designed to collect the sun’s energy, then store and circulate the resulting heat similar to a greenhouse. Active solar systems typically collect and store energy in panels attached to the exterior of a house. This type of system utilizes mechanical fans or pumps to circulate the warm/cool air, while heated water can flow directly into a home’s hot water system.

Additional conservation opportunities are found in new construction. Residential construction techniques for conservation and sustainability have been gaining in popularity and acceptance in recent years. The most widely recognized certifying agency with respect to such construction is LEED, the Leadership in Energy and Environmental Design (LEED) Green Building System. The intent of LEED is to encourage widespread

implementation of development practices that further the concept of sustainability and environmental friendliness in the built environment.

The City strictly enforces Title 24 Energy Requirements. In addition, the local energy company, the Imperial Irrigation District (IID), offers incentives to homeowners with rebates to buy energy efficient air conditioners, appliances and thermostats. IID income-qualifying costumers can also enroll in the Residential Energy Assistance Program (REAP) which provides them with a 20 percent discount on their electric bill. IID also offers a 30 percent REAP discount to qualifying customers age 62 or older. IID also partners with the Citizens Energy Corporation for the Imperial Solar/E-Green and Solar Homes Programs. The Imperial Solar/E-green Program, the nation's largest low-income community solar program generates 30 megawatts of power for the IID grid under a 23-year purchase power agreement. IID directly passes on these savings to all of its qualified low-income electric customers enrolled in the REAP program in the form of an additional monthly discount on their electric bills. Through the Solar Homes Program, using proceeds from their partnership on the Sunrise Powerlink transmission line, Citizens Energy works to install solar rooftop systems for low income residents in Imperial Valley.

Also, air pollution control measures from the Imperial Air Pollution Control District require new construction and development to include energy conservation measures (Imperial County Air Pollution Control District rule 310).

5. Housing Plan

This section of the Housing Element contains the goals, policies, and programs the City of El Centro intends to implement to meet its quantified objectives and address a number of important housing-related issues through the 2021-2029 planning period. The Housing Plan considers accomplishments under the 2013-2021 Housing Element (see Appendix B: Review of Past Accomplishments) and builds upon the identified City's housing needs, constraints on residential development, and resources available to address El Centro's existing and future housing needs, as well as changes to the Housing Element requirements. To make adequate provision for the housing needs of all economic segments of the City and consistent with statutory requirements, the Housing Plan aims to:

- Conserve, preserve, and improve the condition of the existing affordable housing stock [Government Code Section 65583(c)(4 & 6)];
- Assist in the development of housing for extremely low, very low, low, and moderate income households [Government Code Section 65583(c)(2)];
- Identify adequate sites to encourage the development of a variety of types of housing for all income levels [Government Code Section 65583(c)(1)];
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing [Government Code Section 65583(c)(3)]; and
- Promote housing opportunities for all persons [Government Code Section 65583(c)(5)].

5.1 Goals and Policies

Goals are statements of community desires, which are broad in both purpose and aim, but are designed specifically to establish direction. Policies provide specific standards and/or end statements for achieving a goal. Essentially, goals represent desired outcomes the City seeks to achieve through the implementation of policies. The goals and policies that guide the City's housing programs and activities are as follows:

A. Housing Diversity and Opportunities

Striving to provide a balanced inventory of housing in terms of unit type, tenure, cost, and style will allow the City to fulfill a variety of housing needs.

GOAL 1.0: Adequate housing to meet the existing and future needs of El Centro residents.

Policy 1.1: Maintain land use controls and development standards that can accommodate a variety of housing opportunities, including single-family homes, townhomes, apartments, condominiums, mixed-use development,

accessory dwelling units, and mobile homes to fulfill regional housing needs.

- Policy 1.2:** Facilitate the development of affordable housing by offering development incentives on a case-by-case basis.
- Policy 1.3:** Encourage the development of residential units intended to meet the needs of extremely low income households, seniors, persons with disabilities (including persons with developmental disabilities), farm workers, and those experiencing homelessness.
- Policy 1.4:** Work with developers to identify and, when feasible, remove or reduce governmental constraints on affordable housing development.
- Policy 1.5:** Encourage the development of new housing units in close proximity to public transportation and community services, including mixed-use development.
- Policy 1.6:** Identify and pursue State and federal programs and funding to facilitate development of housing that is suitable for lower income (including extremely low income) households, including farmworkers.
- Policy 1.7:** Support the provision of housing services in meeting the housing needs of El Centro residents, including extremely low income households, the homeless and near-homeless, farmworkers, and persons with disabilities.
- Policy 1.8:** Encourage the development of affordable homeownership housing for first-time homebuyers.
- Policy 1.9:** Pursue state and federal funding sources to provide favorable home purchase options to lower and moderate income households.
- Policy 1.10:** Process permits concurrently as a means of streamlining development review.
- Policy 1.11:** Support efforts of non-profits, private developers, and the Imperial Valley Housing Authority to expand the City's supply of affordable housing.
- Policy 1.12:** Encourage developers of multi-family rental housing to include units with three or more bedrooms to accommodate the needs of large households.

B. Maintenance, Preservation, and Conservation of Housing

The majority of El Centro's housing stock is in good condition. However, some older single-family neighborhoods and multi-family structures show evidence of deferred maintenance and deterioration. As the City's housing stock continues to age, on-going maintenance is vital to prevent further deterioration. Other housing conservation needs of the City include existing affordable housing stock and rental units at risk of converting to market-rents or condominiums, and the Housing Choice Voucher Program.

GOAL 2.0: Maintenance and enhancement of the quality of residential neighborhoods and living environments.

- Policy 2.1:** Improve the overall quality and conditions of existing housing in El Centro.
- Policy 2.2:** Advocate and facilitate the conservation and rehabilitation of substandard residential properties by homeowners.
- Policy 2.3:** As funds allow, continue to offer rehabilitation and home improvement assistance to lower income homeowners.
- Policy 2.4:** Work to preserve restricted lower income housing in the City that is at risk of converting to market rate use.
- Policy 2.5:** Continue to support Imperial Valley Housing Authority efforts to preserve and expand rental assistance programs for extremely low income households, including the Housing Choice Voucher Program.
- Policy 2.6:** Discourage smoking in homes that are occupied by children, the elderly, and others with health issues to enhance living environment quality.
- Policy 2.7:** Avoid displacement of residents in carrying out City programs, whenever possible, or provide relocation assistance subject to available funds.
- Policy 2.8:** Conduct a Housing Conditions Survey during the planning period, subject to available funds.
- Policy 2.9:** Preserve and maintain existing and future neighborhoods through continued enforcement of City codes.

C. Affirmatively Further Fair Housing

Promotion of equal housing opportunities for all existing and future El Centro residents is necessary to make adequate provision for the housing needs of all socioeconomic segments of the community.

GOAL 3.0: Equal opportunity for all residents to reside in housing of their choice.

- Policy 3.1:** Prohibit discrimination in the sale, rental, or financing of housing based characteristics protected under State and Federal fair housing laws.
- Policy 3.2:** Accommodate persons with disabilities (including persons with developmental disabilities) who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.
- Policy 3.3:** Encourage the provision of designs that support aging in place (such as universal design) in new development.
- Policy 3.4:** Continue to support and participate with a fair housing service provider that can receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
- Policy 3.5:** Work to mitigate impacts of economic displacement of existing residents.
- Policy 3.6:** Employ place-based strategies to implement neighborhood improvements.
- Policy 3.7:** Expand housing options in the City and promote housing mobility and choices.

D. Energy Conservation in Housing Development

Conserving energy helps reduce household costs and enable households to allocate more disposable income to housing costs, which can reduce the incidence of housing problems such as cost burden and overcrowding.

GOAL 4.0: Housing that maximizes opportunities for energy conservation.

- Policy 4.1:** Promote passive energy conservation measures through site planning and landscaping techniques.
- Policy 4.2:** Encourage developers to exceed minimum Title 24 energy conservation requirements.
- Policy 4.3:** Educate the public regarding simple energy conservation measures that can be implemented in the home.

Policy 4.4: Encourage weatherization improvements, roofing repairs, window replacement, and appliance upgrades to conserve energy.

5.2 Housing Programs

Programs identify specific actions the City will undertake toward putting each goal and policy into action. Each program relates to one or more goals and policies and may overlap the various issue areas.

El Centro offers a variety of housing opportunities to meet the needs of the community. This section of the Housing Plan addresses the issues identified in the previous sections of the Element and provides a strategy to achieve the City's housing goals. The housing programs designed to implement the City's strategy are discussed in detail below.

A. Facilitate the Provision of a Variety of Housing Types, Densities, and Opportunities

A key element in satisfying the housing needs of all segments of the community is the provision for a variety of housing types and densities for renters and owners. This is an important function of both the General Plan and zoning.

Program 1: Adequate Sites for RHNA

The City of El Centro has been assigned a Regional Housing Needs Assessment (RHNA) of 3,442 units for the 2021-2029 planning period. With projected ADUs and entitle/pipeline projects, the City has the ability to provide 754 units, with a remaining RHNA of 2,688 units (1,001 very low income, 490 low income, 282 moderate income, and 915 above moderate income units).

The remaining RHNA will be accommodate entirely on vacant land designated for various residential and mixed use development through the City's newly adopted Land Use Element (June 2021). Based on the City adopted General Plan and zoning, the City is able to accommodate 2,919 units on vacant land (1,029 lower income, 392 moderate income, and 1,498 above moderate income units). This leaves an unaccommodated RHNA of only 562 lower income units. At a minimum density of 21 units per acre, 27 acres of MU-2 Overlay will be needed to accommodate the remaining lower income RHNA.

The City will be updating its Zoning Ordinance to implement the Mixed Use 1 (MU-1) and Mixed Use 2 Overlay (MU-2 Overlay) - two new land use designations created in the new Land Use Element. An estimated 45 moderate income units will be accommodated in MU-1 (12-25 du/ac) and 875 lower income units will be accommodated in the MU-2 Overlay (21-30 du/ac). To meet its remaining RHNA, the City will rezone at least 27 acres properties into MU-2 Overlay. The rezoned sites will meet the requirements of Government Code 65583.2, including but not limited to a minimum density of 20 units per acre, minimum site size to permit at least 16 units on site, and zoned to allow ownership and rental housing by right in which at least 20 percent of the units are affordable to lower income households. Specifically for MU-2 Overlay, the Zoning Ordinance

update will allow standalone multi-family housing, and projects with 20 percent affordable units for lower income households will be eligible for by-right approval, pursuant to State law (see Program 3).

Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. The City will amend the Zoning Code to require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Law.

Responsible Agency: Community Development Department

Financing: Department budget

2021-2029 Objectives:

- Update the Zoning Ordinance to address the replacement requirements within one year of Housing Element adoption.
- Update the Zoning Ordinance to implement the MU-1 and MU-2 Overlay designations of the Land Use Element by October 15, 2024. Specifically, at least 27 acres will be rezoned as MU-2 Overlay to accommodate 562 lower income units that are not accommodated under the adopted General Plan and zoning.
- Maintain and monitor the residential sites inventory to ensure adequate sites remain to accommodate the RHNA throughout the RHNA period.
- Provide sites inventory information online and update at least annually.

Program 2: Monitor Residential Capacity (SB 166 No Net Loss)

City staff will monitor the consumption of residential acreage to ensure an adequate inventory is available to meet the City’s RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. The City’s development application tracking software will notify staff when an application has been submitted for development of a property included in the residential sites inventory (Appendix C). Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and, if necessary, rezone sufficient sites to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

Responsible Agency: Community Development Department; Community Services Department

Financing: Department budget

2021-2029 Objectives:

- Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by 2022.

Program 3: By-Right Approval of Projects with 20 Percent Affordable (AB 1397)

Pursuant to AB 1397, the following categories of sites in the sites inventory of this Housing Element are subject to by-right approval if 20 percent of the units are set aside as affordable housing for lower income households:

- Reuse sites - Vacant R3 and CT sites previously identified in the 4th and 5th cycle Housing Element for lower income RHNA
- Rezone sites - MU-2 Overlay sites for lower income RHNA

Responsible Agency: Community Development Department; Community Services Department

Financing: Department budget

2021-2029 Objectives:

- Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by 2022.

Program 4: Accessory Dwelling Units

Accessory Dwelling Units (ADUs) represent an alternative source of affordable housing. While the City's Zoning Ordinance complies with State law regarding the provision of ADUs, the Zoning definition of accessory unit is unclear and the parking requirement is not consistent with State law. The City will amend the Zoning Ordinance to bring the definition into compliance with State law. Furthermore, the City will develop incentives to facilitate the construction of ADUs.

Responsible Agency: Community Development Department; Community Services Department

Financing: Department budget

2021-2029 Objectives:

- Amend the Zoning Ordinance by the end of 2022 to:
 - Clarify definition of ADUs
 - Establish parking standards in consistent with State law
 - Ensure regulations for single-family dwellings conform to State law allowing ADUs and Junior ADUs (JADUs)
- By 2023, develop incentives to facilitate ADU production. Incentives may include pre-approved plans, expedited review, and increased allowable size, etc.
- Facilitate the construction of 40 ADUs over eight years.

Program 5: Facilitate Affordable and Special Needs Housing Production

Developers of affordable and special needs housing face a number of hurdles, including financing, development codes and standards, and in some cases, public opposition. The City can encourage and facilitate affordable and special needs housing through financial assistance, removal of regulatory constraints, and administrative support. While El Centro does not have a large farmworker population, there is a significant Countywide farmworker population. The USDA's 2017 Census of Agriculture reported that in Imperial County, 7,934 persons are hired farmworkers with an estimated migrant population of about 1,057 persons. Most farmworkers in the County are hired full time.

With limited funding, the City will rely on the following non-funding-related actions to encourage affordable and special needs housing production (including housing for extremely low income households, farmworkers, and the developmentally disabled) during the planning period:

- Collaborate with Affordable and Special Needs Housing Developers: Affordable housing developers work to develop, conserve and promote rental and ownership affordable housing. Particularly in relation to farmworker housing, senior housing, and housing for persons with disabilities (including persons with developmental disabilities), the affordable housing developer is often, but not always, a local organization interested in developing affordable housing. The affordable housing developer is often involved with what is called "assisted housing", where some type of government assistance (such as Section 8 or Tax Credits) is provided to the individual household to keep rents affordable. An affordable or special needs housing developer can help meet the goals for additional housing by implementing or assisting with the implementation of programs described in this Element. The City will continue to collaborate with affordable and special needs housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of City incentive programs (e.g., density bonus).
- Regulatory Concessions and Incentives: The City will continue to work with developers on a case-by-case basis to provide regulatory concessions and incentives to assist them with the development of affordable and senior housing. The newly adopted General Plan Land Use Element provides for increased base density in MU-1 and MU-2 Overlay for senior housing. In a relatively small city like El Centro, this is the most effective method of assisting developers, as each individual project can be analyzed to determine which concessions and incentives would be the most beneficial to the project's feasibility. Regulatory concessions and incentives could include, but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.

Address the Significant Housing Needs of the Regional Farmworker Population: The City will continue to seek funding from the Joe Serna Jr. Farmworker Housing Grant Program (Serna) for the rehabilitation of existing farmworker units and the construction of new units. One project has recently received funding from the Joe Serne Program. The City will also encourage place-based revitalization and reduce displacement risk by organizing bilingual outreach materials and activities to educate

and inform the farmworker community about available City programs and resources.

Responsible Agency: Community Development Department

Financing: Department budget

2021-2029 Objectives:

- Maintain contact information for affordable housing developers special needs service providers for the purposes of soliciting their involvement in development projects in El Centro. Annually, the City will contact local and regional affordable housing developers, especially those that focus on housing for the disabled, seniors, and farmworker households to explore opportunities for affordable housing.
- Participate with affordable and special needs housing developers to review available federal and State financing subsidies and apply as feasible on an annual basis. Provide letters of support to applications of nonprofit developers for affordable housing financing.
- Assist and support developers of housing for lower income households, especially housing for extremely low income households, farmworker households, and the disabled (including the developmentally disabled), with site identification, supporting applications, conducting pre-application meetings, assisting with design and site requirements, and providing regulatory incentives and concessions.
- Collaborate with developers of affordable housing over the planning period to facilitate the construction of 200 affordable units over the planning period (20 extremely low income, 80 very low income, and 100 low income units).

Program 6: First-Time Homebuyer Program

The City will pursue affordable ownership housing opportunities for lower and moderate income households. Specifically, the City will provide information on homebuyer assistance programs available to El Centro residents through the California Housing Finance Agency (CalHFA):

- **Mortgage Credit Certificate (MCC)** - The MCC program offers qualified first-time homebuyers a Federal income tax credit. The credit can reduce potential Federal income tax liability, creating additional net spendable income for qualified first-time homebuyers to possibly use toward their monthly mortgage payment. This MCC Program enables qualified first-time homebuyers to convert a portion of their annual mortgage interest into a direct dollar-for-dollar tax credit on their U.S. individual income tax returns.
- **Homebuyer Loan Programs** - El Centro residents can access homebuyer assistance programs available from CalHFA. These include first mortgage programs and downpayment assistance programs.

Responsible Agency: Community Development Department

Financing: Department budget

2021-2029 Objectives:

- Provide links to CalHFA programs on City website by the end of 2022.
- Annually pursue available funding programs to deliver homebuyer assistance.

B. Removal of Constraints

State law requires the Housing Element to address, and where appropriate and legally possible, remove constraints affecting the maintenance, improvement, and development of housing.

Program 7: Zoning Code Amendments

To facilitate the development of affordable and special needs housing, the State has passed numerous new requirements that necessitate the City of El Centro to amend its Zoning Ordinance. In addition, the City has identified additional changes to its development regulations to facilitate housing development. These changes include:

- **Density Bonus:** The State Density Bonus Law has been amended numerous times in recent years. Key changes include:
 - AB 1763 (Density Bonus for 100 Percent Affordable Housing) - Density bonus and increased incentives for 100 percent affordable housing projects for lower income households.
 - SB 1227 (Density Bonus for Student Housing) - Density bonus for student housing development for students enrolled at a full-time college, and to establish prioritization for students experiencing homelessness.
 - AB 2345 (Increase Maximum Allowable Density) - Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.
- **Emergency and Transitional Housing (AB 139):** Local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone.
- **Low Barrier Navigation Center (AB 101):** AB 101 requires cities to permit Low Barrier Navigation Centers by right in areas zoned for mixed-use and nonresidential zones that permit multi-family uses, if the center meets certain requirements. AB 101 defines a Low Barrier Navigation Center as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.”
- **Supportive Housing (AB 2162):** AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop.

- **Farmworker Housing:** The California Employee Housing Act requires housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household be considered an agricultural land use, and permitted in the same way as other agricultural uses. Update the Zoning Ordinance to allow housing for agricultural workers as defined by the California Employee Housing Act in the RR zone as required by State law.
- **Employee Housing:** The California Employee Housing Act further requires housing for six or fewer employees be considered a single-family residential use. Update the Zoning Ordinance to comply with State law.
- **Open Space Requirements:** Update open space requirement to allow a reduction in open space when high-quality community amenities, such as play structures or covered seating and food preparation areas, are provided.
- **SB 35 Streamlined Approval:** Establish a formal procedure for streamlining, including a pre-application checklist.
- **Residential Care Facilities for Seven or More Persons:** Amend the Zoning Code to address the provision of residential care facilities for seven or more persons as similar uses in the same zone.

Responsible Agency: Community Development Department

Financing: Department budget

2021-2029 Objectives:

- Amend Zoning Ordinance as outlined above by the end of 2022.

Program 8: Water and Sewer Service Priority for Affordable Housing

Senate Bill 1087 (enacted 2006) requires that water and sewer providers develop written policies that grant priority to proposed development that includes housing affordable to lower income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. The City will develop and establish a formal procedure to grant water and sewer priority to developments with units affordable to lower income households pursuant to Government Code Section 65589.7.

Responsible Agency: Public Works Department

Financing: Department budget

2021-2029 Objectives:

- Develop and establish a formal procedure to grant water and sewer priority to developments with units affordable to lower-income households within one year of adoption of the 2021-2029 Housing Element.

C. Provide Supportive Housing Assistance for Special Needs Population

Where there is a need for affordable housing, often there is also a need for supportive services for lower income households, including extremely low income households. The City assists service providers in meeting the immediate needs of persons with special needs, including the homeless, near-homeless, and extremely low income households. Immediate need includes the provision of food, temporary shelter, health care, and other social services. The following programs intend to address the overall need for affordable housing and supportive services in El Centro.

Program 9: Coordination with Social Service Agencies

A variety of social services agencies provide housing and supportive services to special needs groups in El Centro. Several of these social service agencies receive CDBG funds from the City to help administer these programs. The City determines its CDBG allocations to social service agencies annually based upon applications received, whether the agency provides a priority need in the City's five-year Consolidated Plan, and if the agency meets Federal HUD regulations. In a typical program year, funding is allocated to nonprofits that serve the following needs of lower income individuals and households (i.e., those earning up to 80 percent AMI): food distribution, housing assistance, services and programs for the elderly and youth, before and after school care programs, services for the disabled (including the developmentally disabled), primary health care services, and fair housing advocacy and counseling.

Similar to the Housing Element update, the Consolidated Plan involves comprehensive outreach, citizen participation workshops, and assessment of community needs to develop a road map for programs and activities to be pursued in the ensuing five years. The variety of social service agencies that may be awarded CDBG are guided by priority needs articulated in the Consolidated Plan. All CDBG-contracted and funded programs (emergency housing/shelter, food distribution, primary health care services to the indigent or non-insured, senior case-management services and home-delivered meals, and before-and-after school youth programs for lower income families) address and assist the needs of lower income and special needs persons and households of our community.

Responsible Agency: Community Services Department

Financing: CDBG

2021-2029 Objectives:

- Continue to evaluate on an annual basis allocation of CDBG funds to social service agencies to benefit El Centro residents.
- Assist 250 special needs and lower income residents annually.

D. Maintain and Conserve the Existing and Future Housing Stock

Market rents in El Centro are at a level which significantly limits the supply of housing affordable to very low income households. Rental subsidies are necessary to prevent many of the City's very low income residents from spending upwards of 30 percent of their incomes on housing costs, and over-extending themselves financially. In addition to rent subsidies, actions to conserve the 42 at-risk units at the Euclid Villas apartments will be necessary to maintain affordability. Furthermore, although the majority of the City's housing stock is in good condition, the City seeks the continued maintenance and improvement of housing during the planning period.

Program 10: Rental Assistance

The Housing Choice Voucher (HCV) rental assistance program extends rental subsidies to extremely low and very low income families and elderly (i.e., those earning up to 50 percent AMI) who spend more than 30 percent of their income on rent. The subsidy represents the difference between the excess of 30 percent of their monthly income and the actual rent. The Imperial Valley Housing Authority (IVHA) administers the HCV Program in the City of El Centro.

California legislature passed SB 329, which redefines source of income as "lawful, verifiable income paid directly to a tenant or to a representative of a tenant, or paid to a housing owner or landlord on behalf of a tenant, including federal, state or local public assistance, and federal, state, or local housing subsidies, including, but not limited to, federal housing assistance vouchers issues under Section 8 of the United States Housing Act of 1937." SB 222 passed in 2019 also extends the same protection to VASH (Veterans Affairs Supportive Housing) voucher recipients.

Responsible Agency: Imperial Valley Housing Authority

Financing: U.S. Department of Housing and Urban Development (HUD)

2021-2029 Objectives:

- Continue to contract with the IVHA to administer the Housing Choice Vouchers Program and assist an average of approximately 900 extremely low and very low income households annually during the planning period.
- Promote the Housing Choice Vouchers program on City website.
- Partner with its fair housing service provider to educate the community on the new source of income protection.

Program 11: Conservation of Existing and Future Affordable Units

In order to meet the housing needs of all economic groups in El Centro, the City must guard against the loss of housing units available to lower income households. As of June 2021, the City's affordable housing inventory consisted of 914 units, of which 42 units were at risk of converting to market rate rents (see Table 30).

Responsible Agency: Community Services Department; Imperial Valley Housing Authority.

Financing: Section 8 vouchers; PHLA; CalHome

2021-2029 Objectives:

- Monitor Units at Risk: Maintain contact with providers and owners to monitor the status of existing and future affordable units, including the 42 at-risk units at Euclid Villas since they may lose their subsidies due to discontinuation of the Section 8 program at the federal level or opting out by the property owner.
- Work with Potential Purchasers: Where feasible, provide technical assistance to public and non-profit agencies interested in purchasing and/or managing units at risk. As funding permits, provide assistance to leverage the acquisition/preservation of at-risk housing, and/or support the funding applications of nonprofit housing providers to pursue the preservation of at-risk housing.
- Tenant Education: The California legislature extended the noticing requirement of at-risk units opting out of low income use restrictions to three years, requiring notifications three years, one year, and six months prior to conversion. Should a property owner pursue conversion of the units to market rate, the City will ensure that tenants were properly noticed and informed of their rights and that they are eligible to receive Section 8 vouchers that would enable them to stay in their units.
- Assist Tenants of Existing Rent Restricted Units to Obtain Section 8 Voucher Assistance: Tenants of housing units with expired Section 8 contracts are eligible to receive special Section 8 vouchers that can be used only at the same property. The City will assist tenants of "at-risk" units to obtain these Section 8 vouchers through the Imperial Valley Housing Authority.

Program 12: Housing Rehabilitation Loan Program

The City offers a low interest rate loan to lower income owner-occupants to rehabilitate their single family dwelling, address lead-based paint, and conduct asbestos testing. Eligible improvements include, but are not limited to, kitchen cabinetry, roofing, air conditioning, windows/doors, plumbing, electrical, insulation/weather proofing, paint, floor covering, additions to alleviate overcrowding, and total reconstruction (in certain circumstances). Loans amortized at a three percent interest rate are secured with a deed of trust for a maximum term of 15 years. The program also offers deferred loans at zero percent interest, subject to review every 36 months (non-seniors) or 84 months (seniors). The loan-to-value ratio of the property must not exceed 100 percent.

Responsible Agency: Community Services Department

Financing: CDBG

2021-2029 Objectives:

- Assist two low income homeowners annually with rehabilitation loans.
- Assist one low income homeowner annually with lead-based paint reduction.
- Assist one low income homeowner annually with asbestos testing and removal.
- Annually pursue other funding sources (e.g., CalHome) to expand housing rehabilitation assistance.

Program 13: Code Enforcement

Code Enforcement officers respond to complaints related to substandard housing, property maintenance, overgrown vegetation, trash and debris, illegal conversions, improper occupancy and other nuisance and zoning complaints. Code enforcement staff will to inform owner-occupants about the City's Housing Rehabilitation Loan Program (see Program 12).

Responsible Agency: Community Development Department

Financing: CDBG and Department budget

2021-2029 Objectives:

- Continue to implement the applicable sections of the El Centro Municipal Code. Inform eligible owners about the City's Home Improvement Loan Program.
- Conduct code enforcement on 150 units annually.
- Adopt the most recent version of the California Building Code by 2022 and update every three years according to the State Building Code update schedule.

E. Affirmatively Further Fair Housing

Promoting equal housing opportunities for all persons is an important City goal. The following program is intended to help ensure El Centro residents have equal opportunity to obtain and maintain decent and safe housing

Program 14: Fair Housing Services

The City currently contracts with the Inland Fair Housing and Mediation Board (IFHMB) to provide fair housing services and landlord/tenant counseling to City residents. Typically, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling services involves informing landlords and tenants of their rights and responsibilities under the California Civil Code and mediating conflicts between tenants and landlords.

The City monitors and attempts to minimize discriminatory housing practices with the assistance of the IFHMB that is annually funded by the City's CDBG. The City advertises the availability of fair housing services by posting IFHMB posters and provides IFHMB informational flyers at public counters at City Hall and the Community Services Department offices. The City's website also provides a link to IFHMB resources. Furthermore, the City accommodates IFHMB meetings and workshops at Council Chambers and distributes information at tabling events and includes articles about fair housing in a bi-annual newsletter and period newspaper advertisements published in English and Spanish.

As part of this Housing Element update, the City conducted an affirmatively furthering fair housing analysis (Appendix D), pursuant to AB 686. To address the fair housing issues, the City has developed a set of meaning actions to address issues identified (Table 50)

Responsible Agency: Community Services Department; Inland Fair Housing and Mediation Board

Financing:

CDBG

2021-2029 Objectives:

Table 50: Fair Housing Issues and Actions

Contributing Factor	Meaningful Actions
Issue #1: Insufficient fair housing testing and limited outreach capacity	
<ul style="list-style-type: none"> ▪ Lack of fair housing testing services² ▪ Lack of targeted outreach ¹ ▪ Lack of variety of outreach meeting times² ▪ Lack of transportation to services ▪ Lack of awareness of services¹ 	<ul style="list-style-type: none"> ▪ By the end of 2022, meet with the fair housing service provider to revise the scope of work and explore their capability to accommodate the following outreach efforts: <ul style="list-style-type: none"> ○ Plan to hold in-person meetings in various locations in the central census tracts. ○ Seek sites that are transit-accessible and/or consider options to assist residents without vehicle access with transportation. ○ Hold meeting at a variety of times ○ Testing ▪ Starting 2023, increase community awareness of the IFHMB services through postings on the City’s web pages, publication of newspaper display ads, and quarterly Community Newsletter articles, as stated in the 2019 AI. Based on findings from this assessment, the City will also utilize non-traditional media (i.e. social media, City website) in outreach and education efforts, in addition to print media and notices. <ul style="list-style-type: none"> ○ Starting 2023, the City will post monthly social media reminders of the Fair Housing Services offered. ○ Starting 2023, the City will add Fair Housing Service information to the informational TV display located at the City Hall Main Lobby. ▪ Starting 2023, targeted outreach of fair housing services and improvement programs (Home Rehabilitation and Façade Improvement Program for neighborhood serving businesses on Main Street) in R/ECAPs, specifically Census Tract 115. Targeted outreach plan will include: <ul style="list-style-type: none"> ▪ Application Workshop - City staff will host a yearly application workshop at the M.L. King Jr. Sports Pavilion or another City facility in Census Tract 115. The workshop will assist residents in completing applications for the City Housing Rehabilitation Loan Program and First-Time Homebuyer Program. The workshop will also provide an opportunity for City staff to gain valuable input from residents on the City housing programs. Assistance will be provided in English and Spanish. ▪ Direct Mailing Campaign - City staff will coordinate a yearly direct mail campaign to addresses within Census Tract 115 informing residents about City housing programs. Additional mailings within Census Tract 115 will also announce application workshops. Letters will be in English and Spanish to meet the language needs of residents.

Table 50: Fair Housing Issues and Actions

Contributing Factor	Meaningful Actions
	<ul style="list-style-type: none"> ▪ Postings – Flyers and posters will be posted at neighborhood businesses within Census Tract 115 informing residents of the availability of city housing programs and workshops. Possible locations for postings include Coin-O-Matic (laundromat), Euclid Market (market), Raspados Cuchies (restaurant), Los Compadres (market), or Antonio’s Meat Market (market). Postings will be in English and Spanish. ▪ Develop list contact list for apartment managers to which to invite to workshops and send fair housing information by the end of 2022, as stated in the 2019 AI. On an ongoing basis, contact interest list with updates. ▪ Request the Imperial County Association of REALTORS update its website to include information regarding fair housing by the end of 2022, as stated in the 2019 AI. ▪ Request the Imperial Valley Press to publish notice regarding no pets policy and reasonable accommodation by end of 2022, as stated in the 2019 AI. ▪ Ensure the IFBMB is enacting the new actions regarding steering, homebuyer services and seminars, and loan denial rates by the end of 2022 as stated in the 2019 AI. ▪ Subject to funding availability implementing the following actions related to Property Management Practices, as stated in the 2019 AI: <ul style="list-style-type: none"> ▪ Invite the apartment managers to one or more workshops; the topics could include ▪ Fair housing laws in general ▪ Fair housing laws regarding occupancy limits ▪ Fair housing laws regarding reasonable accommodations and modifications ▪ Sample written policies regarding service and companion animals ▪ Distribute information on the above and other topics and distribute it to the apartment managers of all small, medium and large apartment complexes.
<p>Issue #2: Patterns of concentration as well as disparate access to opportunities/ resources for communities in the center of the City.</p>	
<ul style="list-style-type: none"> ▪ Lack of access to local jobs ▪ Lack of high quality schools ▪ Low home values/old housing stock ¹ ▪ Lack of private investment¹ ▪ Lack of public investments in specific neighborhoods, including services or amenities¹ ▪ Location and type of affordable housing-HCV use concentrated² ▪ The availability of affordable units in a range of sizes² 	<ul style="list-style-type: none"> ▪ Developing multifamily and mixed-income housing opportunities through the sites inventory - located close to 50 percent of lower income RHNA units in moderate and high resource areas. ▪ Require an Affirmative Marketing Plan (AMP) a condition for approval for density bonuses by the end of 2022. ▪ By the end of 2023 (at the time of contract renewal), request that the fair housing service provider (IFHMB): <ul style="list-style-type: none"> ○ inform tenants and landlords of the State’s new Source of Income Protection (SB 329 and SB 222) and include this information in advertising materials.

Table 50: Fair Housing Issues and Actions

Contributing Factor	Meaningful Actions
	<ul style="list-style-type: none"> ○ Use TCAC Opportunity Maps to encourage and direct HCV holders to find housing in high opportunity areas. ▪ Continue targeted improvements in CDBG eligible areas, which overlap with areas with low resources/high poverty and segregation. Improvements thus far have included a sports complex and aquatic center. In FY 2021, the City provided CDBG funds to perform upgrades to existing playground at Swarhout Park (located in the center of the City, in an area of high segregation and poverty). ▪ Support the construction of the El Centro Public Library, located in a low resource tract. Construction is expected to be complete by the August 2022. ▪ Support the planned improvement projects in Census Tract 115- undergrounding the Date Canal (completed at the end of 2021) and the north/south connection of N. 12th Street from Oleander Avenue to Pico Avenue (curbs, gutter, and asphalt) to be completed by the end of 2026, both of which will improve the health and safety of the community. ▪ Annually, coordinate with Public Works to prioritize areas identified as Disadvantaged Communities (SB 535) for actions and improvements. The City has invested in public works improvements on Adams Ave through investments on gyms, skate parks, new aquatic center, Caltrans improvements and beatification, and conversions of SRO and hotels to new housing.
<p>Issue #3: Communities with disproportionate housing needs, like cost burdens, overcrowding, and substandard housing conditions, are concentrated in the census tracts in the center of the City.</p>	
<ul style="list-style-type: none"> ▪ Age of housing stock ¹ ▪ The availability of affordable units in a range of sizes ¹ 	<ul style="list-style-type: none"> ▪ Expand outreach to the central census tracts, especially parcels identified in the 2015 Housing Conditions Report, about the City's Home Rehabilitation Program, through targeted outreach efforts in Census Tract 115 by July 2023. ▪ Annually conduct at least one outreach meeting regarding the Home Rehabilitation program at the Community Center ▪ Require an Affirmative Marketing Plan (AMP) a condition for approval for density bonuses by the end of 2022. ▪ As part the Zoning Code Update, the City will update residential development standards to allow more units built per lot. This is expected to be complete by the end of 2022. ▪ By the end of 2022, incentivize ADU construction by publicizing information about them though handouts at City Hall and website and social media posts. Hanfout will be in English ad Spanish. The City will post about ADUs on its social media every month. ▪ Continue to invest on the Adams Avenue Opportunity Area as identified in the Land Use Element Update. This area is part of the City's R/ECAP. Past investments have already improved access to recreation and attracted business and job opportunities.

5.3 Summary of Quantified Objectives

Table 51 summarizes the City’s objectives in housing production, rehabilitation, and conservation/preservation based on the level of financial and administrative resources anticipated during the 2021-2029 Housing Element planning period. The RHNA is a planning goal; actual new construction of housing may not reach the RHNA due to development trends and funding availability. Program objectives are not cumulative as some overlap between programs can be expected given limited funding.

Table 51: Quantified Objectives

Objective Category	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	500	501	490	462	1,489	3,442
New Construction	20	80	100	200	800	1,200
Rehabilitation	0	16	16	0	0	32
Conservation/Preservation						
Affordable (including at-risk housing)	914			0	0	0
Housing Choice Vouchers	900		0	0	0	0

6. Appendix A: Outreach Efforts

A.1. Housing Workshops

Outreach List

In addition to municipal, regional, and state agencies, including school districts and utilities, the following organizations and agencies were sent invitations - to attend the Housing Element Workshops held on February 8, 2021, May 19, 2021, and August 19, 2021.

Table A- 1: Outreach List

Organization	Category
Desert Valley Builder's Association	Developer
Southern California Gas Company	Utility
Imperial Valley Housing Authority	Housing Services
Inland Fair Housing and Mediation Board	Housing Services
California Rural Legal Assistance	Housing Services
Chelsea Investment Corporation (Housing Developer-Multifamily)	Developer
AMG & Associates (Housing Developer-Multifamily)	Developer
Materra (land development)	Developer
YK America (Housing Developer-Multifamily)	Developer
Dubose Design Group (Engineering/planning firm)	Developer
Galey Homes (Housing Developer)	Developer
Comite Civico de Valle	Housing Services
Imperial Valley Continuum of Care	Housing Services
Coachella Valley Housing Coalition	Housing Services
Imperial Valley Rentals (Housing Developer)	Developer
CRP Affordable Housing and Community Development	Developer
Imperial Valley Association of Realtors	Developer
Roben Real Estate (Housing Developer)	Developer
Imperial Valley Association of Realtors	Developer
Methodist Church (Partnered w/affordable housing developer)	Housing Services
Dubose Design Group (Engineering/planning firm)	
Mitchell M. Tsai, Attorney At Law	

Comments Received

The key comments received at the meetings include:

- Concerns over the adequacy of water services from the Imperial Irrigation District (IID) to enable development.
- Concerns over costs associated with constructing or upgrading electrical power services provided by the IID.
- Concerns over impacts on existing school capacity to serve the new housing units.
- Opportunity for affordable homeownership was emphasized.

The 2021-2029 Housing Element includes a program to pursue homeownership assistance. In addition, facilitating multi-family housing can increase the opportunity for affordable homeownership.

A.2. Focus Group Interviews

Public Service Providers

Date: March 30, 2021

Attendees: Coachella Valley Housing Coalition (CVHC), Blaz Gutierrez: CA Rural Legal Assistance (CRLA), Inland Fair Housing and Mediation Board, Molina HealthCare

Expanding housing options, especially urban style options, addressing the housing needs of special needs groups, and affirmatively furthering fair housing are some of the key issues identified. The Housing Element implements the new General Plan Land Use Element to expand the range of housing choices in the City. The Housing Element identifies housing sites located throughout the City, with new opportunities being located in areas near services and amenities.

Table A- 2: Service Provider Focus Group Comments

Housing Needs
<ul style="list-style-type: none">▪ Should consider the correlation between ag industry and rates of injury and their influence with physical disabilities. Ag workers experience high rates of injury, so that population has more disabilities, and higher rates of disabilities among older ag workers, predominantly Hispanic. Also mental health issues.▪ The City's high population does not meet the USDA Rural Funding requirements. So is suggesting a more urban style of housing provision. Need land donation to make housing affordable.▪ Other types of needs include assistance with closing costs, rental assistance, neighborhood clean-up, habitability, and low income housing assistance including access to fair housing information, mobile home trade-in program.
Underserved Groups
<ul style="list-style-type: none">▪ Issues with elderly and disabled persons having access to housing, and farmworkers are being taking advantage by landlords, long wait times for formal farm workers, unlawful evictions and defaults, high rate of unemployment and poverty.▪ Concerns about affirmatively furthering fair housing, would like to see many different housing options, same options for everyone.

Table A- 2: Service Provider Focus Group Comments

Housing Needs
<ul style="list-style-type: none"> Discrimination against persons with disabilities, families with children, COVID has exacerbated the issues, problems accessing the courts. Need more access to safe and affordable housing. Not enough housing to fill the need.
Housing Obstacles
<ul style="list-style-type: none"> Lack of availability of subsidized housing results in them going to private market and put tenants at risk. Affordable housing shouldn't be restricted to only multifamily. To help alleviate the connotation of multifamily with affordable housing, affordable housing should be open to other types of housing stock. Large families need single-family homes. Affordable land with infrastructure for low income projects needed, partnerships with municipalities are very important. Worked on a semi-developed single-family subdivision in Imperial that was left over from the housing crises in 2008. Infrastructure was already in place so that saved a lot of time and cost - Morningside. Capacity fees for affordable housing is a constraint. For affordable housing, recommend defer fees.
Housing Location
<ul style="list-style-type: none"> New housing should be placed in close proximity to basic services (employment, schools, grocery stores, medical care, etc.) transportation is very important on the siting of housing. Not siting places that are near negative environmental factors, the siting of affordable housing should consider potential health impacts.

Developers

Date: April 1, 2021

Attendees: Capital Real Estate Broker, Imperial Valley Home Rentals, YK America

The key obstacle to development is timing. Lengthy process adds to the cost of development. The Housing Element includes a by-right program if projects include 20 percent affordable units in certain locations. Infill development in mixed use areas is an important land use strategy for providing additional opportunities for housing.

Table A- 3: Developer Focus Group Comments and Responses

Housing Needs
<ul style="list-style-type: none"> The only new inventory is out of the price range of most- \$250Ks to 350Ks is the target price range for single-family Repurposing existing commercial buildings that are vacant and unused should be considered, example of motels on Adams Avenue ADUs: Calexico has the triplex initiative where you can have an ADU, House, and converted garage to stimulate housing. Buyers without cash on hand find it difficult winning competitive bidding situations More multi-family needed, affordable housing needed
Underserved Groups
<ul style="list-style-type: none"> All groups are underserved, affordable, entry-level housing needed most, 70%. 20% mid-level prices homes needed, 5% high level needed. Estimates that 70% of single family housing is for mid-level income demand.

Table A- 3: Developer Focus Group Comments and Responses

Housing Needs
Housing Obstacles
<ul style="list-style-type: none"> ▪ Obstacles can include long time to get a project approved ▪ Time it takes to get approvals for housing is obstacle ▪ Hard to plan out for future materials prices, residential demand, mortgage rates ▪ Infrastructure cost is an obstacle, cost of CFDs. ▪ Power capacity is an issue with new developments. Costs to upgrade/construct new power facilities are pricy ▪ Mello Roos helps the builder but not the buyer ▪ Timing is everything with the market (market can change quickly, leads to changes to pricing) ▪ Is difficult when city expresses no-sense of urgency, 12 – 18 months to process a development is way too long, especially if no EIR ▪ Ideal entitlement period of 90 to 180 days, less than 90 days for smaller projects. ▪ Costs are going up, ex. Building materials, interest rates, oil prices. ▪ Cooperation with staff needed not just in Planning, but also Public Works ▪ Builder-friendly city needed ▪ City of Imperial has an advantage with lower impact fees and water and sewer rates were double in El Centro. ▪ Recommends reduced impact or building fees by 50% such as in 2000s. The overbuilt infrastructure costs being imposed on the project reduces demand to develop. ▪ Sometimes conditions imposed by the City are not feasible, deal killers ▪ School districts carry a lot of clout, high fees. ▪ Timing between project approval and issuance of building permits critical ▪ Delays are super expensive. Cost gets added to the cost of the home. ▪ Profit on single-family is really tight in El Centro ▪ Fees are high, especially school fees, connection fees, increasing materials costs ▪ CEQA slows down the process.
Housing Location and Opportunities
<ul style="list-style-type: none"> ▪ Need infill low-income, multifamily and lofts. Infill development is concentrated on multi-family housing while greenfield development is attractive to single family builders ▪ The phase 1 and phase 2 annexation areas (Urban development plan) influences the costs of the homes and direction of growth. ▪ Make areas that are specific plans to entice smaller lot development without having the developer apply for that. ▪ Important for development to be close to day-to-day services ▪ Horizontal mixed use might be successful

Mall Developer (CBL)

Date: April 21, 2021

CBL is a nationwide mall developer. They own 66 malls, including the Imperial Valley Mall (IVM) and additional property north of the IVM in El Centro (see Opportunity Area 4 in the newly adopted Land Use Element).

- Very much in favor of adding multifamily (especially senior living) housing near malls. Highly beneficial for both mall properties and the residents of multifamily units. Built-in customers for the mall. CBL is not apartment developer so they would need a multi-family developer partner. This could be to sell mall land, lease parcel(s), or partnership to build. CBL asked if there are multifamily developers that they should be talking to for a partnership.
- COVID turned retail upside down
- CBL thinks it will be hard to get multifamily inside the ring road at malls
- Example of housing near mall is Leighton, UT, 2 ½ acres, 196 apartments, 6 stories, 2 levels of parking
- City staff asked if CBL liked being in close proximity to Industrial Development, such as distribution centers. CBL prefers proximity to multifamily housing and hotels.
- Looking at the El Centro mall and parking lot configuration, CBL would be interested in creating better walkways to connect future housing and the mall. A possible future connection from an “outer parcel” to Macy’s was discussed.
- Parking ratios and landscape requirements would need to be adjusted
- CBL does not own the Sears store (now vacant). Estimated cost to demolish a Sears store is \$2 million.
- CBL’s experience has been that subsidized housing near mall tends to lead to lower rents and stores closing. They have had better success with developers working in the market (market-rate housing).
- CBL is also interested in the idea of including schools, medical uses, office, grocery stores, amenities, etc., in and around their properties as part of the MU overlay. In favor of creating a mixed-use environment that offers a lot of things to a lot of people. Would like to create a “suburban town center.”
- CBL asked if the City has any kind of government aid to help with economic development near mall that might be a catalyst
- City staff also asked about whether governmental uses would be appropriate near the mall? County of Imperial may need more office space.
- In other areas, to spur mall activity, entertainment uses are being added (pre-COVID), Dick’s Sporting Goods, Main Event, hotels, restaurant pads, furniture store, fitness centers, climbing fitness centers (CBL doesn’t add these uses, rather partners with developers.)

A.3. Incorporation of Comments

The City already addressed many of the comments through the Land Use Element. Feedback relating to the location and type of housing needed is addressed through changes in land use designations. The Mixed Use 1 and Mixed Use 2 Overlay land use designations are new designations created for the Land Use Element update. Both of these designations provide for new multi-family residential opportunities in areas that are on or near key commercial corridors in proximity to transit, existing and proposed pedestrian and bicycle paths, and shopping and other services. The updated Land Use Element also redesignates the majority of Rural Residential properties to Low density and Medium density residential land use designations to provide increased opportunities for moderate and above moderate income households. Stakeholder feedback was also used in determining the location of the sites in the inventory by identifying sites with near-term development.

In terms of the needs assessments, the City incorporated the feedback received from the City regarding an examination of the correlation between farmworkers and injuries and how this affects their housing type needs (p.25). Some residents also expressed the need for affordable and safe housing and for the City to affirmatively further fair housing. In response, the City has developed an extensive Fair Housing Plan (Table 50). The City also conducted a survey specifically related to AFFH and used the results, mainly that while services are available, the public is not aware of them, to improve its outreach actions in the Fair Housing Program.

Appendix B: Review of Past Accomplishments

Government Code Section 65588(a) requires each jurisdiction to review its housing element as frequently as appropriate to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community’s housing goals and objectives; and
- The progress of the city, county or city and county in implementation of the housing element.

This section documents the City’s achievements under the 2013-2021 Housing Element with respect to the actions and objectives contained therein. This section describes the relative success of the City’s efforts to implement the 2013 programs, and contains recommendations for program retention, revision, deletion or addition to address current and projected needs and state requirements for the 2021-2029 planning period. The Housing Element planning period covers from October 15, 2013 through October 15, 2021. However, the RHNA planning period did not commence until January 1, 2014 and extended through October 31, 2021. Therefore, residential units permitted prior to January 1, 2014, although fall within the Housing Element planning period, will not receive RHNA credits for this Housing Element.

Table B- 1 compares quantified objectives and accomplishments during the 2014-2021 (through end of 2020). Table B- 2 lists these housing programs and provides a summary of accomplishments during the prior period.

Table B- 1: Objectives and Accomplishments

Income Category	RHNA Objective	New Construction		Rehabilitation		Conservation/ Preservation	
		Objective	Accomplishment	Objective	Accomplishment	Objective	Accomplishment
Extremely Low	487	5	195	0	0	42	42
Very Low		20		8	10		
Low		35		16	1		
Moderate	297	340	271	0	0	0	0
Above Moderate	840	500	83	0	0	0	0
Total	1,924	900	680	24	11	42	42

Effectiveness in Addressing Special Needs

The City of El Centro was successful in addressing the housing needs of special needs populations. Specifically, the City was able to facilitate the construction of special needs and affordable housing by activities that are not funding related:

- Rezoning a 4.33-acre site to high density residential for senior and affordable housing

- Amending the Zoning code to facilitate the establishment of residential care facilities and group homes in the residential zones.
- Processing requests for reasonable accommodation.

In addition, the City was able to provide a range of supportive services for special needs groups using CDBG funds. For the 2021-2029 Housing Element, the City will pursue state funding for affordable and special needs housing.

Table B- 2: Review of Past Program Accomplishments

Goal and Associated Programs	Accomplishments	
Facilitate the Provision of a Variety of Housing Types, Densities, and Opportunities		
Program 1: Land Use Controls and Development Capacity	Maintain and monitor the residential sites inventory to ensure adequate sites remain to accommodate the RHNA throughout the RHNA period. Provide sites inventory information to interested developers.	Site inventory was available for developers at the customer service counter for review. Continued Appropriateness: This program will be updated to reflect the new RHNA and the new requirements pursuant to AB 1397.
Program 2: Monitor Residential Capacity (No Net Loss)	Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by January 2014.	Between 2013 and 2020, 115 single family units were built on vacant lots, nine (9) single family homes were built as the first phase of the Lotus Ranch subdivision, 49 accessory dwelling units were built on existing single family dwelling lots, 162 multi-family units were built (72 of them as part of an affordable housing project) and a total of 174 former hotel rooms were converted to studio units, resulting in no net loss in housing capacity during the planning period. Continued Appropriateness: This program continues to be appropriate pursuant to SB 166.
Program 3: Facilitate Affordable and Special Needs Housing Production	Encourage and facilitate affordable and special needs housing through financial assistance removal of regular constraints, and administrative support.	During the planning period, the Community Development Department facilitated affordable housing and provided administrative support to the by: <ul style="list-style-type: none"> ▪ Facilitating the rezone of a 4.33-acre property to multiple-family residential for the proposed construction on high-density senior and affordable housing (2013). ▪ Approving the site plan for a 73-unit Multiple Family residential development proposed by AMG & Associates (2014). ▪ Assisting Chelsea Development in completing an Environmental Assessment for possible funding for the affordable housing project Countryside II/Girasol Apartments project at 1776 W. Adams Avenue (2017). In 2020, the City processed the application for the construction of the development. ▪ Working with AMG & Associates, LLC to prepare two phases of the El Dorado Affordable Housing Development (2019), both of which are under construction. <p>In 2013, the City also amended the Zoning code to facilitate the establishment of residential care facilities and</p>

Table B- 2: Review of Past Program Accomplishments

Goal and Associated Programs		Accomplishments
		group homes in the residential zones. The Community Development continues to be in contact with local developers of affordable housing.
Program 4: First-Time Homebuyer Program	Continue to pursue CalHFA and other available funding programs to deliver the First Time Homebuyer Program. Assist three low income and seven moderate income first-time homebuyers annually during the planning period.	Between 2013 and 2020, no applicant homebuyers applied for the first time homebuyer program. Continued Appropriateness: The 2021-2029 Housing Element includes a program to provide outside resources for homebuyer assistance and to pursue funding in the future.
Program 5: Farmland Mitigation Fee	Study farmland mitigation fund options and present to the Planning Commission and City Council for initial consideration.	The Community Development Department initiated research on establishing a farmland mitigation fee program in 2015 and initiated discussions with the Community Services Department in developing a program. The program was not pursued as it was viewed as a hindrance to housing development. Continued Appropriateness: This program is removed from the 2021-2029 Housing Element.
Removal of Constraints		
Program 6: Reasonable Accommodation	Modify the Reasonable Accommodation Ordinance to establish a ministerial review procedure. Reduce or eliminate the \$428 application fee.	An amendment to the City's Zoning Ordinance that established a ministerial review procedure for reasonable accommodation requests and that eliminated the application fee was adopted by the City Council in April 2015. No applications for reasonable accommodation were requested in 2016, 2017, 2018, 2019, or 2020. Continued Appropriateness: The City amended the ordinance to provide a formal process for reasonable accommodation. Ongoing implementation of the Zoning Ordinance is not included in the 2021-2029 Housing Element as a program.
Program 7: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws	Monitor State and federal legislation as well as City development process and zoning regulations to identify and remove housing constraints.	The Community Development Department monitored legislative change to State and Federal laws and recommended pertinent updates to the City Code at such a time that they became necessary. In 2016, the Community Development Department began the process to amend the zoning code to increase the opportunity for the construction of accessory dwelling units in compliance with Senate Bill 1069 and Assembly Bill 2406 in 2016 and Senate Bill 229 and Assembly Bill 494 in 2018. The ADU ordinance is expected to go to City Council in December 2021. Continued Appropriateness: The 2021-2029 Housing Element includes a program to specifically identify changes to Zoning Ordinance to comply with State laws.
Program 8: Water and Sewer Service Priority for Affordable Housing	Develop and establish a formal procedure to grant water and sewer priority to developments with units affordable to lower income households within one year of adoption of the 2013-2021 Housing Element.	The City provides water and sewer services. Since there is no scarcity in sewer or water capacity, this has not been a priority. Continued Appropriateness: The adoption of policy to prioritize water and sewer services is required by State

Table B- 2: Review of Past Program Accomplishments

Goal and Associated Programs		Accomplishments
		law. This program is included in the 2021-2029 Housing Element.
Provide Supportive Housing Assistance for Special Needs Populations		
Program 9: Coordination with Social Service Agencies	Continue to evaluate on an annual basis allocation of CDBG funds to social service agencies to benefit El Centro residents.	Between 2013 and 2020, approximately \$3,646,602 CDBG funds were programmed to be disbursed to public service agencies. Public service agencies assisted with CDBG funds include Catholic Charities Senior Nutrition Program, Catholic Charities House of Hope, the El Centro Police Athletic League, Woman Haven, and the Child Abuse Prevention Council. Continued Appropriateness: The City continue to provide a range of services for special needs groups. This program is included in the 2021-2029 Housing Element.
Maintain and Conserve the Existing and Future Housing Stock		
Program 10: Rental Assistance	Continue to contract with the Imperial Valley Housing Authority to administer the Housing Choice Vouchers Program and assist an average of approximately 900 extremely low and very low income households annually during the planning period.	The Imperial Valley Housing Authority counted 933 very low and low income households in El Centro assisted with Housing Choice Vouchers as of the 2020. The waitlist period is approximately 22 months as of 2020. Continued Appropriateness: This program remains relevant and is modified in the 2021-2029 Housing Element to include outreach and education on source of income protection.
Program 11: Conservation of Existing and Future Affordable Units	Work with property owners interest groups and the State and Federal governments to implement actions on an ongoing basis to conserve its affordable housing stock.	The City did not lose any affordable housing due to conversion to market rate during the planning period. Continued Appropriateness: This program is updated and included in the 2021-2029 Housing Element.
Program 12: Housing Rehabilitation Loan Program	Assist two low-income homeowners and one very low-income homeowner annually.	The City intended to assist 16 low income and eight (8) very-low income homeowners through the Housing Rehabilitation Loan Program. One (1) low income household and 10 vey-low income households were assisted between 2013 and 2020. Continued Appropriateness: This program continues to be relevant and is included in the 2021-2029 Housing Element.
Program 13: Code Enforcement	Continue to implement the applicable sections of the El Centro Municipal Code. Inform eligible owners about the City's Home Improvement Loan Program.	During the planning period, 1,048, Code Enforcement cases were closed on housing related complaints. Code Enforcement Officer also distributed information pamphlets to potentially eligible homeowners about the City's Housing Rehabilitation Loan Program. Continued Appropriateness: This program continues to be relevant and is included in the 2021-2029 Housing Element.
Program 14: Fair Housing Services	Continue to contract with a fair housing service provider to provide fair housing services. Maintain the link on the City website providing information about fair housing services.	Since 2007 the City of El Centro has contracted with the Inland Fair Housing and Mediation Board (IFHMB) to conduct the necessary community outreach as it relates to fair housing laws and discrimination. During the planning period, outreach material was primarily provided by the IFHMB. The City also distributes information at tabling events and includes articles about fair housing in a bi-

Table B- 2: Review of Past Program Accomplishments

Goal and Associated Programs		Accomplishments
		<p>annual newsletter. The IFHMB has its own outreach efforts they provide, such as public service announcements, distribution of brochures at various sites within El Centro, fair housing community events. The City maintained pamphlets on fair housing at the Community Development Department and Community Services Department public service counters.</p> <p>Continued Appropriateness: This program is expanded to address the affirmatively furthering fair housing requirements.</p>

7. Appendix C: Sites Inventory

Table C- 1: 2021-2029 Sites Inventory

Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
13	053-136-007	153 W STATE	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
13	053-136-023	156 W OLIVE	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
20	044-392-016	1464 W ADAMS AVE	Mixed Use 1	CT*	1.85	F	12.1-25.0	19	35	Moderate	Yes	Y
20	044-392-005	1464 W ADAMS AVE	Mixed Use 1	CT*	0.15	F	12.1-25.0	19	2	Moderate	Yes	Y
25	052-062-018	W BARBARA WORTH DR	High-Medium Density Residential	R3	0.23	G	12.1-25.0	19	4	Moderate	Yes	Y
25	052-062-017	W BARBARA WORTH DR	High-Medium Density Residential	R3	0.22	G	12.1-25.0	19	4	Moderate	Yes	Y
26	053-215-030	W OLIVE DR/N 1ST ST	High-Medium Density Residential	R3	0.43		12.1-25.0	19	8	Moderate	Yes	Y
27	053-136-020	134 W OLIVE AVE	High-Medium Density Residential	R3	0.27	H	12.1-25.0	19	5	Moderate	Yes	Y
27	053-136-019	W OLIVE DR/N 1ST ST	High-Medium Density Residential	R3	0.17	H	12.1-25.0	19	3	Moderate	Yes	Y
28	053-135-018	132 W STATE ST	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
29	053-292-006	151 W ORANGE AVE	High-Medium Density Residential	R3	0.16		12.1-25.0	19	3	Moderate	Yes	Y
30	053-283-005	257 W HOLT	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
31	044-351-004	1438 WOODWARD AVE	High-Medium Density Residential	R3	0.38		12.1-25.0	19	7	Moderate	Yes	Y
32	053-293-022	W HOLT AVE/S 2ND ST	High-Medium Density Residential	R3	0.16	I	12.1-25.0	19	3	Moderate	Yes	Y
32	053-293-021	W HOLT AVE/S 2ND ST	High-Medium Density Residential	R3	0.15	I	12.1-25.0	19	2	Moderate	Yes	Y
33	053-291-008	528 S 2ND DR	High-Medium Density Residential	R3	0.09	J	12.1-25.0	19	1	Moderate	Yes	Y
33	053-291-009	532 S 2ND DR	High-Medium Density Residential	R3	0.17	J	12.1-25.0	19	3	Moderate	Yes	Y
34	053-762-026	E HAMILTON AVE	High-Medium Density Residential	R3	0.25		12.1-25.0	19	4	Moderate	Yes	Y
35	053-043-035	517 W COMERCIAL ST	High-Medium Density Residential	R3	0.24		12.1-25.0	19	4	Moderate	Yes	Y
36	044-371-005	N 7TH ST	High-Medium Density Residential	R3	0.23		12.1-25.0	19	4	Moderate	Yes	Y
38	053-404-009	201 HAMILTON	High-Medium Density Residential	R3	0.2		12.1-25.0	19	3	Moderate	Yes	Y
39	053-136-015	W STATE ST/S 1ST ST	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
40	053-271-002	473 W BRIGHTON	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
41	053-263-004	W BRIGHTON/S 6TH ST	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
42	053-341-003	W HOLT AVE/S 8TH ST	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
44	044-381-022	N 7TH ST	High-Medium Density Residential	R3	0.19		12.1-25.0	19	3	Moderate	Yes	Y
45	053-214-024	W ORANGE AVE/2ND ST	High-Medium Density Residential	R3	0.18		12.1-25.0	19	3	Moderate	Yes	Y
46	044-402-005	1051 EL CENTRO AVE	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
47	044-402-007	1025 EL CENTRO AVE	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
48	053-213-003	W OLIVE AVE/2ND ST	High-Medium Density Residential	R3	0.17		12.1-25.0	19	3	Moderate	Yes	Y
49	053-046-034	PARK AVE/N 4TH ST	High-Medium Density Residential	R3	0.16		12.1-25.0	19	3	Moderate	Yes	Y
50	053-292-002	181 W ORANGE	High-Medium Density Residential	R3	0.16		12.1-25.0	19	3	Moderate	Yes	Y

Table C- 1: 2021-2029 Sites Inventory

Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
51	053-412-048	713 S 2ND AVE	High-Medium Density Residential	R3	0.16		12.1-25.0	19	3	Moderate	Yes	Y
52	053-134-002	W STATE ST/NEW ST	High-Medium Density Residential	R3	0.15		12.1-25.0	19	2	Moderate	Yes	Y
54	053-262-019	692 W HOLT LN	High-Medium Density Residential	R3	0.1		12.1-25.0	19	1	Moderate	Yes	Y
55	053-213-019	W OLIVE AVE/NEW ST	High-Medium Density Residential	R3	0.08		12.1-25.0	19	1	Moderate	Yes	Y
58	044-402-011	1014 W ADAMS AVE	Mixed Use 1	CT*	0.16		12.1-25.0	19	3	Moderate	Yes	Y
59	044-404-024	832 W ADAMS AVE	Mixed Use 1	CT*	0.16		12.1-25.0	19	3	Moderate	Yes	Y
60	044-414-029	652 W ADAMS AVE	Mixed Use 1	CT*	0.15		12.1-25.0	19	2	Moderate	Yes	Y
79	054-573-006	SMOKETREE DR/2ND ST	Medium Density Residential	R2	5.2		6.1-12.0	8	41	Moderate	Yes	Y
81	052-456-003	1703 S 21ST ST	Medium Density Residential	R2	0.27	K	6.1-12.0	8	2	Moderate	Yes	Y
81	052-456-001	1657 S 21ST ST	Medium Density Residential	R2	0.26	K	6.1-12.0	8	2	Moderate	Yes	Y
81	052-456-002	1699 S 21ST ST	Medium Density Residential	R2	0.27	K	6.1-12.0	8	2	Moderate	Yes	Y
82	052-453-047	S 2ND ST/PEPPER CT	Medium Density Residential	R2	0.25	L	6.1-12.0	8	2	Moderate	Yes	Y
82	052-453-049	S 2ND ST/PEPPER CT	Medium Density Residential	R2	0.25	L	6.1-12.0	8	2	Moderate	Yes	Y
82	052-453-048	S 2ND ST/AURORA CT	Medium Density Residential	R2	0.25	L	6.1-12.0	8	2	Moderate	Yes	Y
83	044-580-004	N 8TH ST/W PICO AVE	Medium Density Residential	R2	0.19		6.1-12.0	8	1	Moderate	Yes	Y
84	053-282-009	305 W HOLT AVE	Medium Density Residential	R2	0.19		6.1-12.0	8	1	Moderate	Yes	Y
85	053-216-009	111 W BRIGHTON AVE	Medium Density Residential	R2	0.19		6.1-12.0	8	1	Moderate	Yes	Y
86	044-362-021	1080 EUCLID AVE	Medium Density Residential	R2	0.18		6.1-12.0	8	1	Moderate	Yes	Y
88	053-401-011	304 W HAMILTON	Medium Density Residential	R2	0.16		6.1-12.0	8	1	Moderate	Yes	Y
91	044-401-019	W EUCLID AVE/N 12TH ST	Medium Density Residential	R2	0.14		6.1-12.0	8	1	Moderate	Yes	Y
92	053-394-021	452 W VINE	Medium Density Residential	R2	0.13		6.1-12.0	8	1	Moderate	Yes	Y
93	053-281-011	324 W HOLT AVE	Medium Density Residential	R2	0.1	I	6.1-12.0	8	1	Moderate	Yes	Y
146	No APN (Property being annexed)	S DOGWOOD/E McCABE	High-Medium Density Residential	R3	11.27		12.1-25.0	19	227	Moderate	Yes	Y
1	064-470-103	N WATERMAN AVE/W LINCOLN AVE	High-Medium Density Residential	R3	6.41		12.1-25.0	19	121	Lower	Yes	Y
2	053-740-048	THOMAS DR/6TH ST	High-Medium Density Residential	R3	1.19	A	12.1-25.0	19	22	Lower	Yes	Y
2	053-740-049	THOMAS DR/6TH ST	High-Medium Density Residential	R3	1.72	A	12.1-25.0	19	32	Lower	Yes	Y
3	052-070-065	303 S LA BRUCHERIE RD	High-Medium Density Residential	R3	2.81		12.1-25.0	19	53	Lower	Yes	Y
4	064-560-002	436 W EUCLID AVE	High-Medium Density Residential	R3	1.61	B	12.1-25.0	19	30	Lower	Yes	Y
4	064-560-003	1630 EUCLID AVE	High-Medium Density Residential	R3	0.81	B	12.1-25.0	19	15	Lower	Yes	Y
7	052-061-041	1998 W BARBARA WORHTH	High-Medium Density Residential	R3	0.9	C	12.1-25.0	19	17	Lower	Yes	Y
7	052-061-079	W BARBARA WORTH DR/S LA BROUCHERIE RD	High-Medium Density Residential	R3	0.43	C	12.1-25.0	19	8	Lower	Yes	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
8	053-552-002	4TH ST (CA 86)/DESERT GARDENS DR	Neighborhood Commercial	CN	1.12		12.1-25.0	19	21	Lower	Yes	Y
10	053-211-009	265 W OLIVE	High-Medium Density Residential	R3	0.52	D	12.1-25.0	19	9	Lower	Yes	Y
10	053-211-010	265 W OLIVE	High-Medium Density Residential	R3	0.53	D	12.1-25.0	19	10	Lower	Yes	Y
11	052-061-082	1761 ADAMS	High-Medium Density Residential	R3	0.68		12.1-25.0	19	12	Lower	Yes	Y
12	053-291-012	S 2ND ST/W HOLT ST	High-Medium Density Residential	R3	0.6		12.1-25.0	19	11	Lower	Yes	Y
14	053-740-041	2502 S 4TH ST	Tourist Commercial	CT	1.25		12.1-25.0	19	23	Lower	Yes	Y
16	053-740-042	2502 S 4TH ST	Tourist Commercial	CT	1.11		12.1-25.0	19	21	Lower	Yes	Y
18	053-740-043	2502 S 4TH ST	Tourist Commercial	CT	1.07		12.1-25.0	19	20	Lower	Yes	Y
100	053-740-040	2502 S 4TH ST	Tourist Commercial	CT	9.74		12.1-25.0	19	185	Lower	Yes	Y
17	053-810-004	2380 S 4TH	Tourist Commercial	CT	1.28		12.1-25.0	19	24	Lower	Yes	Y
19	053-810-010	W WAKE AVE/6TH ST	Tourist Commercial	CT	0.7	E	12.1-25.0	19	13	Lower	Yes	Y
19	053-810-011	W WAKE AVE/6TH ST	Tourist Commercial	CT	0.7	E	12.1-25.0	19	13	Lower	Yes	Y
19	053-810-012	W WAKE AVE/6TH ST	Tourist Commercial	CT	0.7	E	12.1-25.0	19	13	Lower	Yes	Y
21	054-571-014	DRIFTWOOD DR/SMOKETREE DR	Tourist Commercial	CT	1.08		12.1-25.0	19	20	Lower	Yes	Y
23	044-391-066	W EUCLID/EL CENTRO AVE	Tourist Commercial	CT	0.82		12.1-25.0	19	15	Lower	Yes	Y
24	054-573-005	SMOKETREE DR/S 3RD ST	Tourist Commercial	CT	0.77		12.1-25.0	19	14	Lower	Yes	Y
140	064-450-076	2204 2208 LA BRUCHERIE	General Commercial/MU-2 Overlay	CG**	20.13		21-.0-30.0	21	210 10 acres assumed to be developed with lower income= 210 units; 10.13 acres assumed to be developed with commercial	Lower	No	Y
141	064-442-007	N WATERMAN AVE/CRUICKSHANK	High-Medium Density Residential	R3	3.64		12.1-25.0	19	69	Lower	No	Y
143	NO APN YET	WAKE AVE/S CYPRESS DR	High-Medium Density Residential	R3	5.59		12.1-25.0	19	106	Lower	Yes	Y
151	054-530-009	IV Mall (1560 1558 DOGWOOD BLVD)	General Commercial/MU-2 Overlay	CG**	1.49		21-.0-30.0	21	31	Lower	No	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
152	054-530-050	IV Mall	General Commercial/MU-2 Overlay	CG**	3.47		21-.0-30.0	21	72	Lower	No	Y
153	054-530-007	IV Mall (1560 1558 DOGWOOD BLVD)	General Commercial/MU-2 Overlay	CG**	2.69		21-.0-30.0	21	56	Lower	No	Y
154	054-530-049	IV Mall	General Commercial/MU-2 Overlay	CG**	2.25		21-.0-30.0	21	47	Lower	No	Y
155	054-430-041	The Commons Property	General Commercial/MU-2 Overlay	CG**	6.42		21-.0-30.0	21	134	Lower	No	Y
156	054-430-069	The Commons Property	General Commercial/MU-2 Overlay	CG**	5.17		21-.0-30.0	21	108	Lower	No	Y
157	054-430-069	The Commons Property	General Commercial/MU-2 Overlay	CG**	5.17		21-.0-30.0	21	108	Lower	No	Y
158	054-430-069	The Commons Property	General Commercial/MU-2 Overlay	CG**	5.17		21-.0-30.0	21	108	Lower	No	Y
161	052-070-108	SEC La Brucherie and Main	High-Medium Density Residential	R3	5.51		12.1-25.0	21	112	Lower	No	Y
78	054-530-056	S/E portion of Imperial Valley Mall	Medium Density Residential	R2	21.18		1.0-6.0	8	169	Above Moderate Income	No	Y
95	052-270-026	AUSTIN RD, N OF VINE CT	Low Density Residential	R1	19.46	L	1.0-6.0	3.5	68	Above Moderate Income	Yes	Tier I
95	052-270-029	W. ORANGE AVE/SANTA ROSA RD	Low Density Residential	R1	7.77	L	1.0-6.0	3.5	27	Above Moderate Income	Yes	Tier I
95	052-270-002	W ORANGE AVE E OF SANTA ROSA RD	Low Density Residential	R1	27.06	L	1.0-6.0	3.5	86	Above Moderate Income	Yes	Tier I
96	064-450-014	N LA BROUCHERIE/BRADSHAW RD	Low Density Residential	R1	55.73		1.0-6.0	3.5	195	Above Moderate Income	Yes	Tier I
98	044-440-001	N 8 TH ST BETWEEN BRADSHAW AVE & W EL DORADO AVE	Low Density Residential	R3	14.23		1.0-6.0	3.5	49	Above Moderate Income	Yes	Y
99	052-793-011	W ORANGE AVE/SOLANO AVE	Low Density Residential	R1	3.06		1.0-6.0	3.5	10	Above Moderate Income	Yes	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
102	044-254-024	1001 W EL DORADO PL	Low Density Residential	R1	1.5	N	1.0-6.0	3.5	5	Above Moderate Income	Yes	Y
102	044-254-026	1003 W EL DORADO DR	Low Density Residential	R1	2.83	N	1.0-6.0	3.5	9	Above Moderate Income	Yes	Y
102	044-254-031	877 W EL DORADO AVE	Low Density Residential	R1	0.6	N	1.0-6.0	3.5	2	Above Moderate Income	Yes	Y
103	052-776-002	W MAIN ST/LOTUS AVE	Low Density Residential	R1	4.61		1.0-6.0	3.5	16	Above Moderate Income	Yes	Y
104	052-794-035	223 RD BETWEEN MOIOLA AVE & W BRIGHTON AVE	Low Density Residential	R1	0.17	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-034	MOIOLA AVE E OF 23 RD ST	Low Density Residential	R1	0.15	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-033	MOIOLA AVE E OF 23 RD ST	Low Density Residential	R1	0.16	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-027	MOIOLA AVE E OF 23 RD ST	Low Density Residential	R1	0.17	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-023	W BRIGHTON AVE E OF 23 RD ST	Low Density Residential	R1	0.15	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-024	W BRIGHTON AVE E OF 23 RD ST	Low Density Residential	R1	0.14	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-026	W BRIGHTON AVE E OF 23 RD ST	Low Density Residential	R1	0.16	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-012	W ORANGE AVE/23 RD ST	Low Density Residential	R1	0.16	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
104	052-794-032	MOIOLA AVE E OF 23 RD ST	Low Density Residential	R1	0.25	O	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
105	052-270-028	646 S GLENWOOD DR	Low Density Residential	R1	0.93	P	1.0-6.0	3.5	3	Above Moderate Income	Yes	Y
105	052-270-035	1852 A AUSTIN DR	Low Density Residential	R1	1.16	P	1.0-6.0	3.5	4	Above Moderate Income	Yes	Y
105	052-270-034	1852 A AUSTIN DR	Low Density Residential	R1	1.17	P	1.0-6.0	3.5	4	Above Moderate Income	Yes	Y
107	044-252-027	1475 W EL DORADO DR	Low Density Residential	R1	0.48	Q	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
107	044-252-009	1651 N IMPERIAL DR	Low Density Residential	R1	0.13	Q	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
107	044-252-008	1427 W EL DORADO	Low Density Residential	R1	0.81	Q	1.0-6.0	3.5	2	Above Moderate Income	Yes	Y
107	044-252-007	1451 W EL DORADO	Low Density Residential	R1	0.67	Q	1.0-6.0	3.5	2	Above Moderate Income	Yes	Y
107	044-252-028	1675 N IMPERIAL	Low Density Residential	R1	0.19	Q	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
108	044-251-016	1902 N 12TH	Low Density Residential	R1	1.03	R	1.0-6.0	3.5	3	Above Moderate Income	Yes	Y
108	044-251-017	1898 N 12TH	Low Density Residential	R1	1.03	R	1.0-6.0	3.5	3	Above Moderate Income	Yes	Y
109	044-252-018	1602 N 12TH DR	Low Density Residential	R1	1.44		1.0-6.0	3.5	5	Above Moderate Income	Yes	Y
111	053-807-007	W OF JACARANDA DR & DANENBERG DR	Low Density Residential	R1	1.3		1.0-6.0	3.5	4	Above Moderate Income	Yes	Y
112	044-252-020	W EL DORADO AVE W OF N 12 TH ST	Low Density Residential	R1	0.14		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
113	053-752-080	E HOLT AVE BETWEEN S HOPE ST & DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
113	053-752-079	E HOLT AVE BETWEEN S HOPE ST & DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
113	053-752-078	E HOLT AVE BETWEEN S HOPE ST & DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
113	053-752-077	E HEIL AVE BETWEEN S HOPE ST & S DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
113	053-752-076	E HEIL AVE BETWEEN S HOPE ST & S DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
113	053-752-075	E HEIL AVE BETWEEN S HOPE ST & S DOGWOOD RD	Low Density Residential	R1	0.16	S	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
115	052-044-018	467 S HASKELL DR	Low Density Residential	R1	0.34	T	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
115	052-044-016	HASKELL ST	Low Density Residential	R1	0.4	T	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
116	053-761-017	E HEIL AVE BETWEEN S HOPE ST & S DOGWOOD RD	Low Density Residential	R1	0.05		1.0-6.0	3.5	0	Above Moderate Income	Yes	Y
117	052-791-008	195 S 23RD ST	Low Density Residential	R1	0.19	U	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
117	052-791-016	23 RD ST BETWEEN W STATE ST & W OLIVE AVE	Low Density Residential	R1	0.17	U	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
117	052-791-017	23 RD ST BETWEEN W STATE ST & W OLIVE AVE	Low Density Residential	R1	0.17	U	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
119	052-732-006	1230 GLENWOOD DR	Low Density Residential	R1	0.22		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y

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Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
120	052-452-032	2451 W ROSS AVE	Low Density Residential	R1	0.4		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
122	044-272-014	798 W PICO DR	Low Density Residential	R1	0.33		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
123	053-231-011	396 E BRIGHTON AVE	Low Density Residential	R1	0.16	V	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
123	053-231-010	398 E BRIGHTON	Low Density Residential	R1	0.16	V	1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
124	044-280-009	N 6 TH ST BETWEEN SANDY AVE & VILLA AVE	Low Density Residential	R1	0.29		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
125	053-761-022	E HAMILTON AVE BETWEEN S DOGWOOD RD & S HOPE ST	Low Density Residential	R1	0.29		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
126	044-261-015	1402 N 12TH ST	Low Density Residential	R1	0.25		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
127	053-752-061	E HEIL AVE BETWEEN S DOGWOOD RD & S HOPE ST	Low Density Residential	R1	0.21		1.0-6.0	3.5	1	Above Moderate Income	Yes	
128	044-273-004	603 W LINCOLN AVE	Low Density Residential	R1	0.19		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
129	053-143-012	E OLIVE AVE/S HOPE AVE	Low Density Residential	R1	0.17		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
130	053-233-028	395 MC CULLOM WAY	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
131	053-231-014	E BRIGHTON AVE BETWEEN S HOPE ST & McCULLOM ST.	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
132	053-143-007	253 E STATE AVE	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y

Table C- 1: 2021-2029 Sites Inventory

Site #	APN	Address	GP Designation	Zoning	Acres	Consolidation Potential (A – W)	Density Range (du/ac)	Density Factor	Unit Potential	Income Level	5 th Cycle	Infrast ruct ure
133	053-143-005	E STATE ST BETWEEN S FAIRFIELD DR & S HOPE ST	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
134	053-223-023	208 E BRIGHTON AVE	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
135	053-152-022	E STATE ST BETWEEN S HOPE ST & McCULLOM ST	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
136	053-423-003	221 E HEIL AVE	Low Density Residential	R1	0.16		1.0-6.0	3.5	1	Above Moderate Income	Yes	Y
137	054-360-008	241 W DANENBERG DR	Medium Density Residential	R2	10.62	W	1.0-6.0	8	84	Above Moderate Income	Yes	Y
137	054-360-007	299 W DANENBERG DR	Medium Density Residential	R2	15.37	W	1.0-6.0	8	122	Above Moderate Income	Yes	Tier I
137	054-360-038	W DANENBERG DR W OF FARNSWORTH LN	Medium Density Residential	R2	7.84	W	1.0-6.0	8	62	Above Moderate Income	Yes	Tier I
138	054-360-067	3056 BELL LN	Low Density Residential	R1	0.5		1.0-6.0	3.5	1	Above Moderate Income	Yes	Tier I
159	052-280-008	AUSTIN RD/ROSS AVE	Low Density Residential	R1	153.98		1.0-6.0	3.5	485	Above Moderate Income	No	Tier I
160	052-042-023	W MAIN ST BETWEEN SANTA ROSA RD & SUNSET RD	Low Density Residential	R1	9.9		1.0-6.0	3.5	34	Above Moderate Income	No	Tier I
163	052-791-012	23 RD ST/W OLIVE RD	Low Density Residential	R1	0.25		1.0-6.0	3.5	1	Above Moderate Income	No	Y
164	052-791-014	23 RD ST BETWEEN W OLIVE RD & MOIOLA AVE	Low Density Residential	R1	0.22		1.0-6.0	3.5	1	Above Moderate Income	No	Y

*Requires a new zone to implement the new MU-1 land use designation as approved in the Land Use Element (updated June 2021)

** Requires a new zone to implement the new MU-2 Overlay land use designation as approved in the Land Use Element (updated June 2021)

Figure C- 1: Sites Inventory Quadrant Key

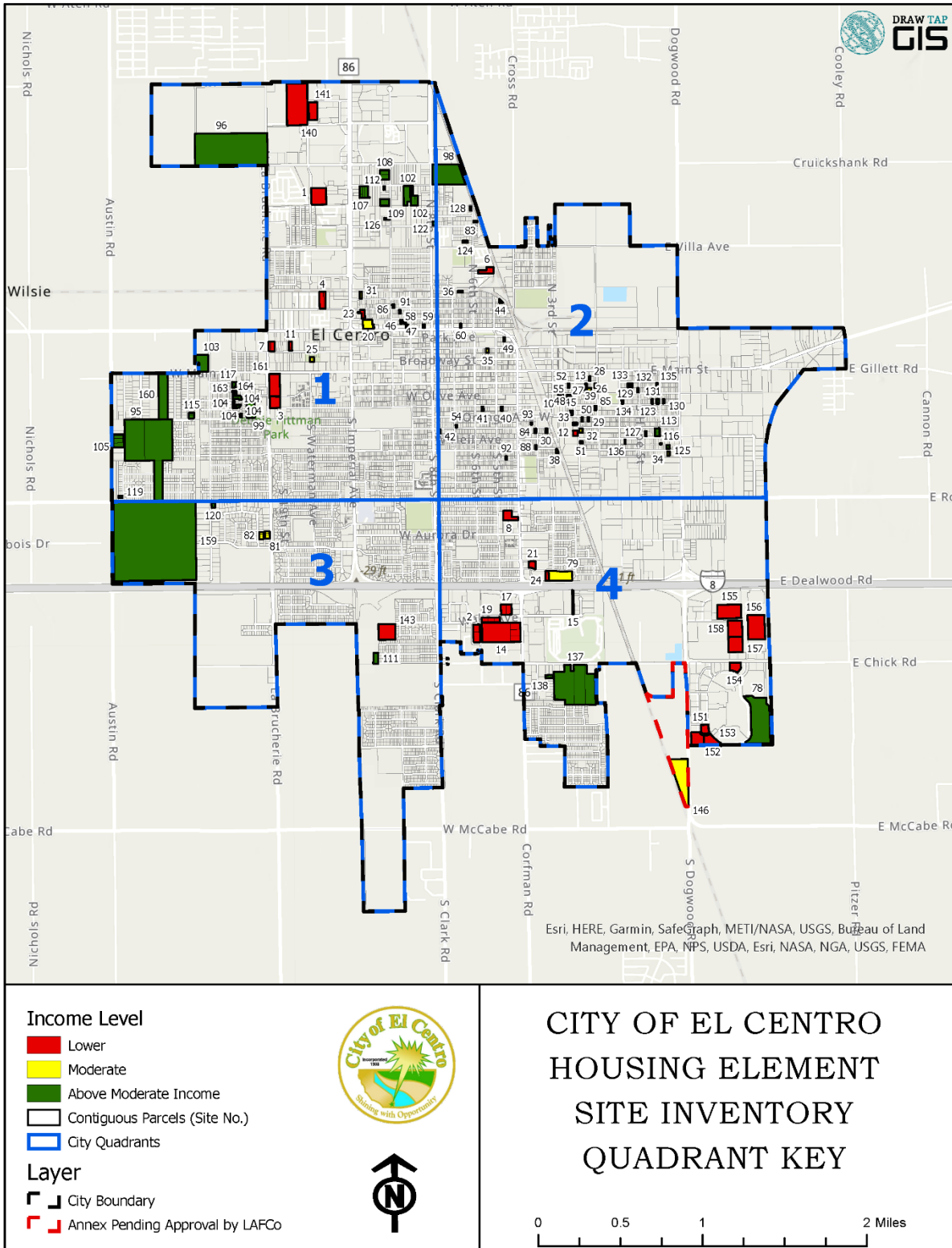


Figure C- 2: Sites Inventory - Quadrant One

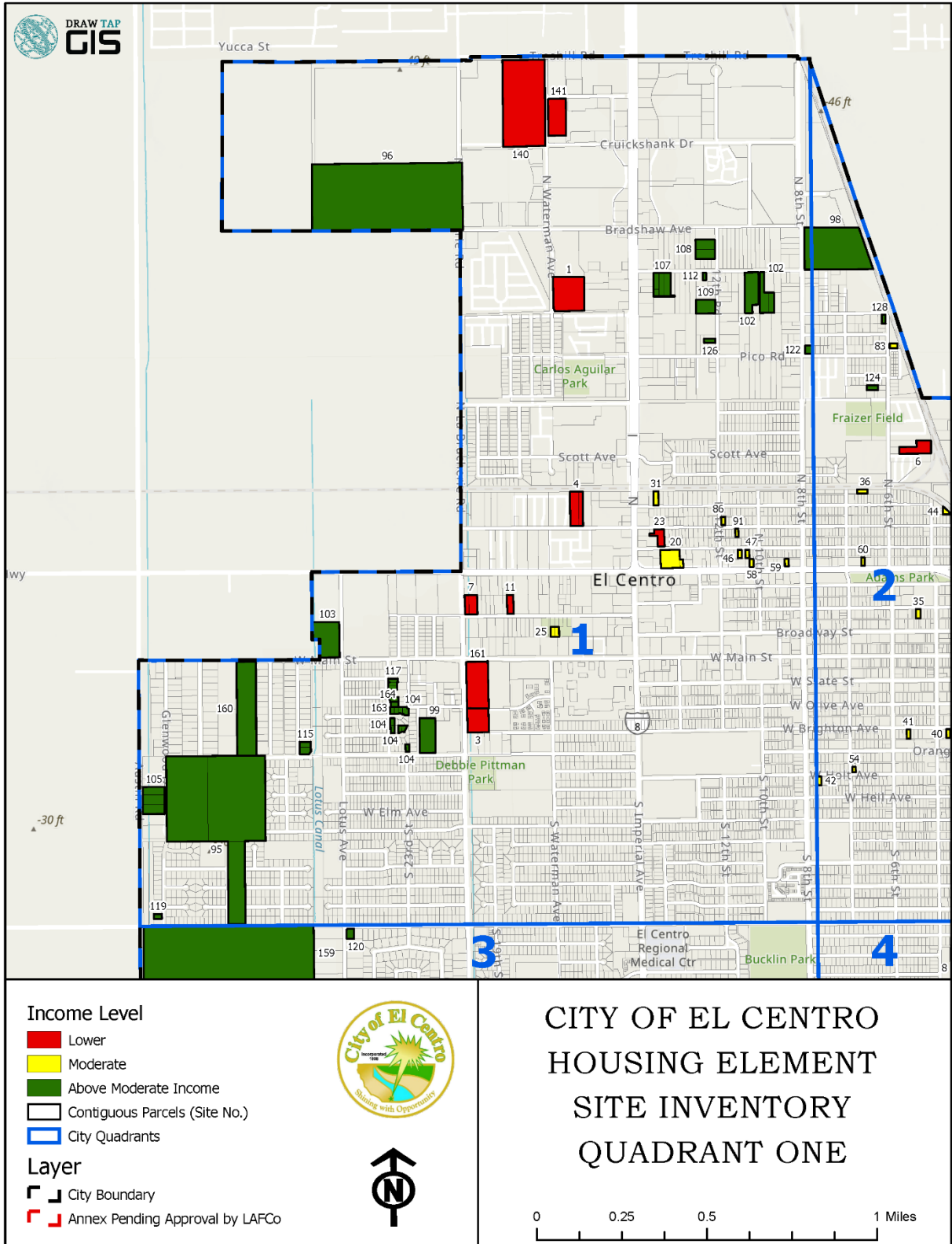


Figure C- 3: Sites Inventory - Quadrant Two

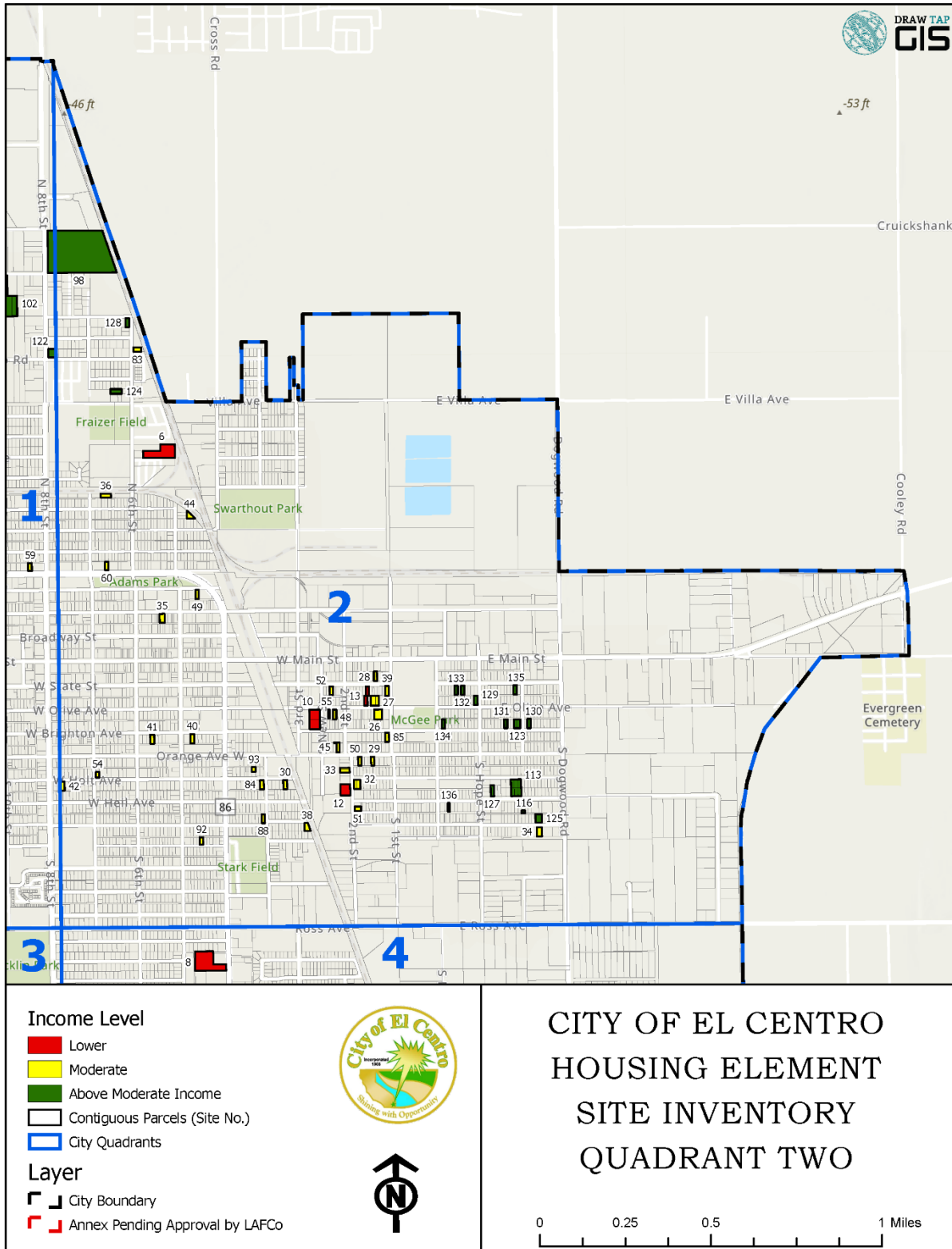


Figure C- 4: Sites Inventory - Quadrant Three

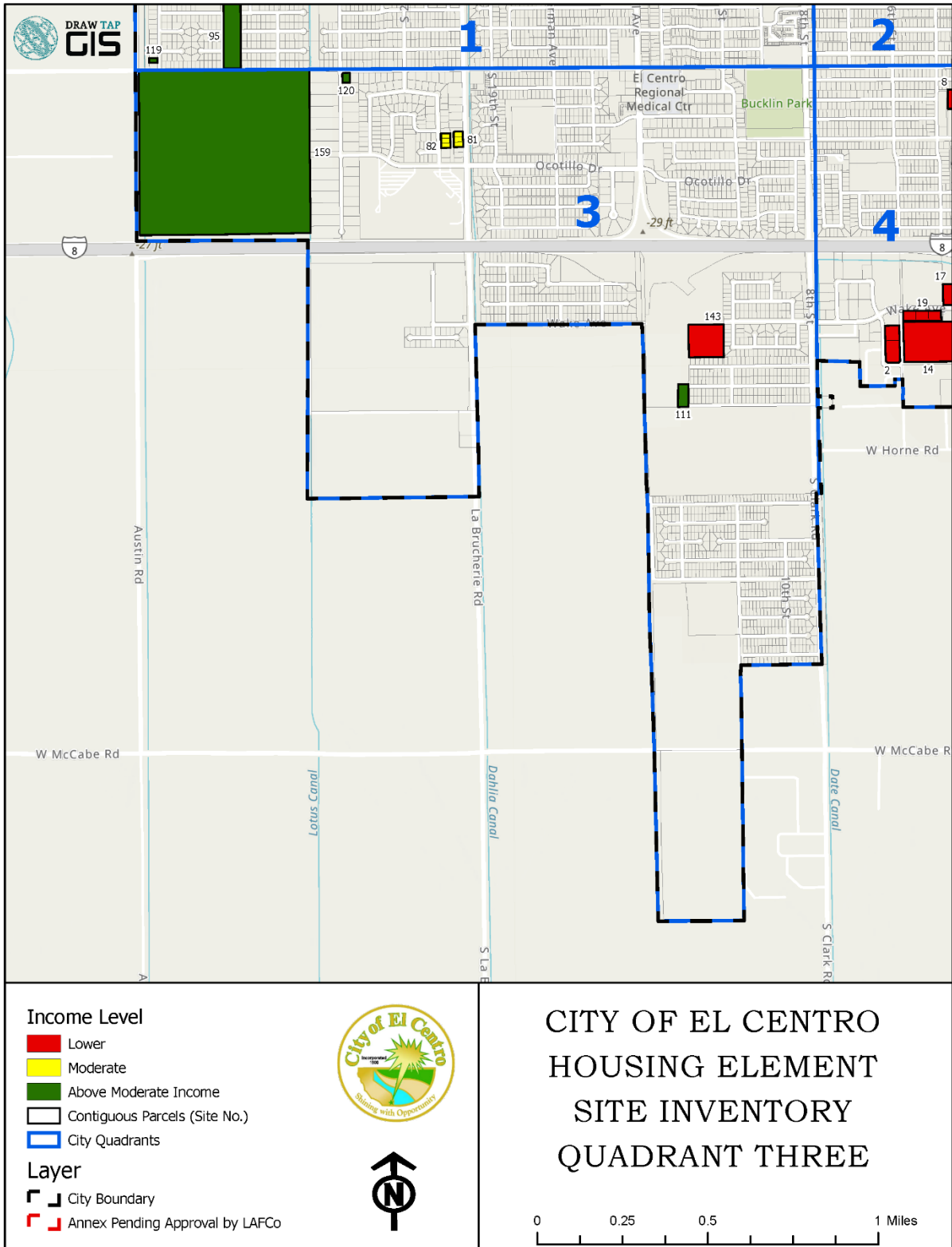
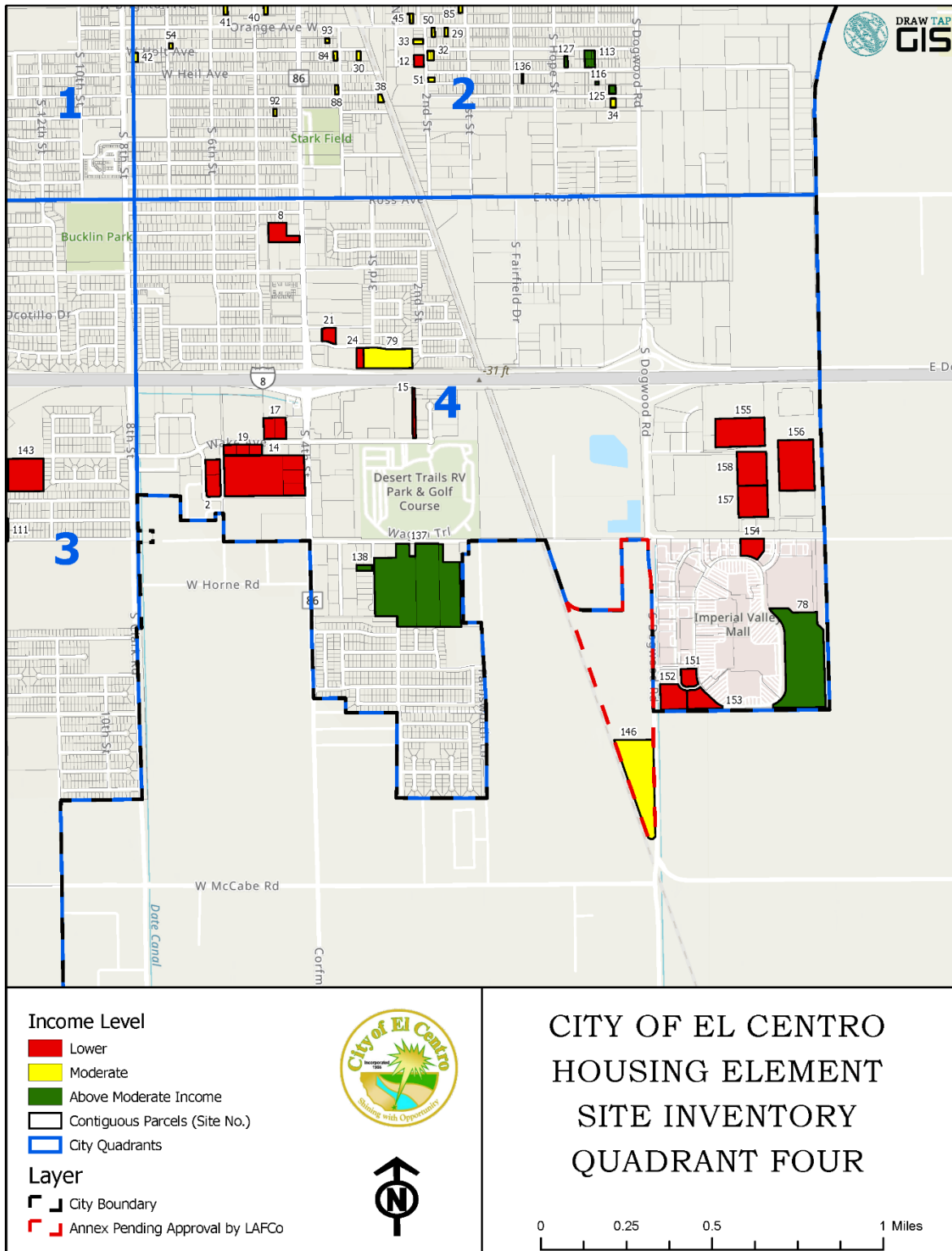


Figure C- 5: Sites Inventory - Quadrant Four



8. Appendix D: Affirmatively Furthering Fair Housing

D.1 Introduction and Overview of AB 686

AB 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

The City's Economic Development Division prepared the 2019-2024 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (2019 AI) with valuable input from the Community Development Department, Inland Fair Housing and Mediation Board, Imperial County Association of Realtors, Access to Independent, Imperial Valley Transit, Imperial Valley Housing Authority, and the community. As appropriate, data and discussions from the 2019 AI are incorporated here. Imperial County does not prepare Analysis of Impediments to Fair Housing Choice. Regional data for this analysis uses HCD's 2020 AI for regional comparisons.

D.2 Community Participation Process

The preparation, adoption, and implementation of a housing element requires a diligent effort to include all economic segments of the community. AB 686 reinforces and builds on this requirement. Under AB 686 and changes to Housing Element Law, the element must describe meaningful, frequent, and ongoing community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element.

The preparation of the Housing Element was conducted alongside the preparation of the Land Use Element Update process. Appendix A summarizes the outreach efforts for the preparation of the Housing Element. The City conducted two Housing Element Workshops and notified municipal, regional, and state agencies, including school districts and utilities, as well as organizations and agencies in its stakeholder list (Table A- 1. Due to the COVID-19 pandemic, public engagement was held virtually through Zoom. The City also conducted three focus interviews with developers and service providers.

Land Use Element Update process began in 2019 through its adoption on June 2021. Input for the public during this process was imperative to identify housing development strategies and areas of opportunities to meet RHNA and affirmatively further fair housing. Major accomplishments from the Land Use Element reflected in the Housing Element is the use of Mixed-Use land use designations as well as Opportunity Areas to create multi-family housing opportunities near services.

For the Land Use Element Update, the process kicked off with a video introduction to the General Plan update, featuring the Mayor of El Centro, and posted on the City's webpage, inviting residents to participate in the process. The City handled the marketing for all the workshops, using the City's website, project website, and Facebook, and typically providing two weeks' notice in advance of the events. The City also kept a stakeholder list of those who expressed interest in the project either by attending sessions, or signing up to receive notices about the project through the project website, or by contacting the City directly. These stakeholders were also directly notified of opportunities to participate.

Each of the workshop flyers promoting the workshops was prepared and distributed in both English and Spanish. A Spanish language interpreter provided real-time interpretation at both of the pop-up workshops that included the in-person Aquatic Center opening event and also at the virtual workshop focusing on Downtown El Centro. At both sessions, attendees were able to fully participate regardless of whether their primary language was English or Spanish. A project website was kept up throughout the process. Meeting notices and meeting summaries were posted in both English and Spanish.

The City also conducted a community survey early in the process that was distributed in both hard copy at the Aquatic Center pop-up event and was also made available online. A separate in-person session (workshop) exclusively for older adults was held by the Spanish language interpreter at the El Centro Senior Center, and 40 participants filled out the Spanish-language survey at that event, with assistance as-needed by the interpreter. The City received over 200 completed surveys. The results of the survey indicated that many residents get their information from the City's Facebook page, and preferred to participate through Facebook Live.

Once COVID prevented in-person meetings, virtual workshops were conducted online. The public was invited to participate through Zoom, or Facebook Live, and offered the opportunity to participate in-person in the City Council Chambers. Because of the ongoing pandemic, few residents chose to participate in-person. Those Spanish speakers participating through Zoom were encouraged to participate through the Spanish channel selection through which real-time interpretation was provided. Using either Zoom or Facebook Live, participants could input questions in either English or Spanish, and real-time responses were provided.

A Technical Advisory Committee (TAC), consisting of 20 community members including the Mayor, a Planning Commissioner, representatives from the development community, real estate groups, local hospital, business and volunteer organizations, etc. met four times to provide guidance and input for the project. Each Technical Advisory Committee member was encouraged to take back and share information with the groups they represent, and also to encourage their individual networks to participate in the Land Use Element update.

D.3 Assessment of Fair Housing Issues

A. Fair Housing Enforcement and Outreach

Housing discrimination complaints can be filed directly with HUD. In California the housing discrimination complaints are processed by HUD's San Francisco Office of Fair Housing and Equal Opportunity (FHEO). El Centro's residents may also file complaints with the State Department of Fair Employment and Housing (DFEH), and local fair housing providers such as the Inland Fair Housing and Mediation Board.

As outlined in El Centro's 2019 AI, the City has committed to complying with applicable federal and state fair housing laws including, but not limited to, the Fair Housing Act of 1968, the Fair Housing Amendments Act of 1988, and the Fair Housing Employment and Housing Act (FEHA). The City currently contracts with the Inland Fair Housing and Mediation Board (IFHMB) to provide fair housing services and landlord/tenant counseling to City residents. Typically, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling services involves informing landlords and tenants of their rights and responsibilities under the California Civil Code and mediating conflicts between tenants and landlords.

The City monitors and attempts to minimize discriminatory housing practices with the assistance of the IFHMB that is annually funded by the City's CDBG. The City advertises the availability of fair housing services by posting IFHMB posters and provides IFHMB informational flyers at public counters at City Hall and the Community Services Department offices. The City's website also provides a link to IFHMB resources. Furthermore, the City accommodates IFHMB meetings and workshops at Council Chambers and distributes information at tabling events and includes articles about fair housing in a bi-annual newsletter and period newspaper advertisements published in English and Spanish.

Fair Housing Enforcement

Regional Trends

HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO investigates fair housing complaints, conducts compliance reviews, ensures civil rights in HUD programs, and manages fair housing grants. According to HCD's 2020 Analysis of Impediments to Fair Housing, 4,198 fair housing complaints were filed in California between January 1, 2015 and November 14, 2019, with the number of complaints decreasing from 1,158 in 2015 to 327 in 2019. Based on a Community Needs Assessment Survey and stakeholder consultations conducted as part the of 2020 AI, HCD concluded that people are choosing not to report complaints due to a limited understanding of fair housing protections and a lack of resources to support fair housing claims at the local level.

The California Department of Fair Employment and Housing (DFEH), in partnership with HCD, is also responsible for enforcing California's state fair housing laws. The department handles fair

housing complaints, provides resources to the community, and cooperates with HUD if the matter falls into HUD's jurisdiction. According to the DFEH Annual Reports, 12 housing complaints were filed by complainants in Imperial County between 2013 and 2019. The Annual Reports did not include details for the basis for discrimination of these complaints. However, HCD's 2020 AI reported that statewide, between 2015 and 2019, the primary basis of fair housing complaints filed with DFEH was disability (51 percent), followed by race, color, or ancestry, 16 percent, and familial status, 10 percent.

Local Trends

Housing discrimination complaint data was compiled by the Inland Fair Housing and Mediation Board (IFHMB) for the period from 2015 through 2018. During this four-year period, 32 housing discrimination complaint cases were filed with the IFHMB. The 32 cases were filed on the following basis: disability (19), familial status (4), national origin (3), race (3), arbitrary (2), religion (1).

The San Francisco Regional Office of HUD provided the City with housing discrimination complaint data for calendar years 2000 through 2012 and no complaints from 2013 to 2018. During the 13-year period, 10 cases were filed with HUD. The bases were as follows: disability (6), national origin (4), familial status (3), sex (3), retaliation (1). The number of bases (17) exceeds the number of cases (10) because a case can have more than one basis. Both the IFHMB and HUD data indicate that the most frequent bases for a housing discrimination complaint include disability, familial status, and national origin. El Centro's 2019 AI demonstrates that the City is in compliance with fair housing requirements. The City has a program to process housing discrimination complaints; has not been subject to a HUD-initiated complaint; has not been subject to a compliance review; and has not been subject to a fair housing lawsuit.

Fair Housing Testing

Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing involves the use of an individual or individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, state, and federal fair housing laws.

Regional Trends

HCD's 2020 AI did not include any data related to for housing testing at a statewide or regional level. However, it did find Limited community awareness of fair housing protections and enforcement resource (impediment #4). Comments to the 2020 AI suggested that the AI should include concrete actions to increase fair housing testing such as developing and funding a fair housing testing program at DFEH similar to the United States Department of Justice's fair housing testing program. A testing program at DFEH is likely to be similarly effective in identifying and counteracting housing discrimination in California. The state could also consider providing direct funding for fair housing organizations to conduct testing. The 2020 AI recommends supporting the increase of fair housing testing to identify housing discrimination.

Local Trends

El Centro did not report any results from Fair Housing testing. According to the 2019 AI, Inland Fair Housing and Mediation Board's (IFHMB) scope of services does not include fair housing

testing. As such, it does not appear that the City actively and routinely conducts fair housing testing. As found in HCD's 2020 AI, a fair housing testing program and funding is necessary.

Fair Housing Education and Outreach

Regional Trends

The 2021-2021 Imperial County Housing Element contained a review of the County's housing outreach program (Program 4.1.1) for the 5th Cycle that "encourage[d] the development and implementation of housing outreach and education programs to inform the public of available housing opportunities, as well as various assistance programs available to eligible households, by continuing to provide information about the County's housing programs by posting flyers on community boards and at gas stations, schools, and other public places." The review of the program reported that while the County discusses strategies to encourage housing outreach and education programs at all Board of Supervisor meetings, there has been no interest in such a program. The County's 2021-2029 Element includes a new Fair Housing Outreach Program which commits the County to:

- Develop bilingual outreach materials to inform the public of available housing opportunities, as well as various assistance programs available to eligible households, to be posted on the County's website and community boards and at gas stations, schools, and other public places and;
- Coordinate with local fair housing providers to conduct a public workshop on tenant and landlord rights and responsibilities.

Local Trends

The City contracts with Inland Fair Housing and Mediation Board's (IFHMB) to provide residents with fair housing services. IFHMB scope of services provides the City with a comprehensive program committed to Fair Housing Education, Outreach, and Enforcement.

Community awareness of IFHMB services have been through monthly community outreach, community events and social media. IFHMB attends a monthly Imperial Valley Continuum of Care Council Meetings. The monthly meetings are to engage individuals and organizations of the Imperial Valley in a community-based process that works to eradicate homelessness in the region. The monthly collaborative meeting is attended by many City of El Centro community organizations and provides a great opportunity to collaborate with other community organizations.

IFHMB also accomplished the following:

- Monthly outreach throughout the City to inform El Centro residents of programs and services the agency provides.
- Attend community events/meetings - e.g., Point in Time Count
- Transitional Fair - Resource Fair
- Radio ads - Fair Housing Month
- Social media - Facebook, Twitter, Eventbrite, Google AdWords, Mailchimp

- Agency Workshops (flyers) – are promoted using various social media platforms such as (Facebook, Twitter, Eventbrite, and Mailchimp), IFHMB website, City of Centro City Hall community board
- Average annual agency programs and services outreach distributed 10,000
- First Time Homebuyer workshop conducted in El Centro – 19 workshops
- Fair Housing Workshops – 13 workshops (FY-14-18)
- Attendees received information on California landlord-tenant laws, and state and federal fair housing laws, including information about the protected classes under the Fair Housing Act, with an emphasis on the reasonable accommodation and reasonable modification process for persons with disabilities

Fair housing outreach capacity relates to the ability of a locality and fair housing entities to disseminate information related to fair housing and provide outreach and education to assure community members are aware of fair housing laws and rights. Despite extensive outreach activities, these efforts have limited effectiveness.

As part of the 2019 AI, the City posted a Resident Fair Housing Survey in the English and Spanish languages on its website for a 4-month period. However, there were no responses to the online survey. A short survey related to Fair Housing was also conducted during the May 19, 2021 Community Fair Housing Workshop. The survey had five respondents, only one of which was aware of the City’s fair housing services. The respondents also selected social media as the best medium to receive information about Fair Housing services. In addition, the respondents said that the following would improve access to services:

- Information about the services,
- More services,
- Services in Spanish,
- Evening services, and
- Transportation to services

The City already uses social media to post information about Fair Housing services. Due to COVID-19, the City relied primarily on zoom webinars to discuss the Housing Element with the public. These meetings were all held in the evenings during the week. City chambers were open to the public to attend in person for the meetings. Interpreter services were available at all three community workshops. As described in Appendix A, municipal, regional, and state agencies, including school districts and utilities, housing developers, and housing services providers were directly notified of the meetings.

The 2019-2024 AI for the City also reported that a survey of on-site property managers revealed that impediments to fair housing choice because of ill-informed property management practices. Therefore, subject to funding availability, the City would implement the following actions:

- Invite the apartment managers to one or more workshops; the topics could include: Fair housing laws in general, fair housing laws regarding occupancy limits, fair housing laws regarding reasonable accommodations and modifications, sample written policies regarding service and companion animals;

- Distribute information on the above and other topics and distribute it to the apartment managers of all small, medium and large apartment complexes.

The 2019-2024 AI also listed the following activities actions to affirmatively further fair housing to improve outreach and education of fair housing laws and resources:

- The City will request in FY 2019/2021 that the Imperial County Association of REALTORS:
 - Revise the Resources tab on its web site to:
 - Add a Fair Housing Information button (e.g., include information on steering, link to the Inland Fair Housing and Mediation Board, etc.)
 - Add information to the current Insurance button such as the value of a C.L.U.E. Report (Comprehensive Loss Underwriting Exchange) when purchasing a home
- During the five-year period from FY 2019-2020 through FY 2023-2024, the City's fair housing provider – Inland Fair Housing & Mediation Board – will:
 - Offer as part of its home buyer counseling services examples of how to detect “steering” during the home search process and how to detect “loan steering.”
 - Provide information to renters attending workshops on how to detect steering behavior by resident property managers.
 - Continue to include “steering” as a category of alleged housing discriminatory acts.
 - Continue to provide information on homeowners insurance and C.L.U.E. Report (Comprehensive Loss Underwriting Exchange) during homebuyer counseling service
 - If funding allows, annually review ads published in newspapers, on-line apartment search sites, and craigslist. Ads with discriminatory words or phrases should be investigated in more detail with follow-up enforcement actions, if necessary
 - Offer a 3-hour Fair Housing course for brokers and sales persons. Every four years, when renewing their license, all brokers and sales persons are required to complete a course on fair housing. Currently, most renewals are accomplished through online courses.
- Encourage the Imperial Valley Press to publish a concise “no pets” notice that indicates rental housing owners must provide reasonable accommodations for “service animals” and “companion animals” for disabled persons.

B. Integration and Segregation

Race/Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices can be

used to are used to measure how evenly two groups are distributed throughout a jurisdiction. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

Regional Trends

Imperial County is unique in southern California and the state in that its Hispanic population is significantly higher (more than twice) the proportion observed statewide (39 percent) and in the Los Angeles and San Diego Counties (46 percent and 34 percent, respectively, Table D- 1). In Imperial County, 84 percent of the population identifies as Hispanic or Latino. Most cities within the county have similar share of Hispanic population, ranging from 75 percent in Calipatria to 98 percent in Calexico. Because Hispanic population is predominant in Imperial County, the share of White population is also significantly lower than statewide and in other Southern California counties. Only 10 percent of the population is White, with all other races having shares of less than two percent of the entire population.

Between 2000 and 2017, Imperial County's Hispanic population increased by almost 51,241 persons and its share of the total population increased from 72 percent in 2000 to 84 in 2017. During the 18-year period, the Asian, Black, and White populations decreased in both absolute and relative terms. That means that Hispanics accounted for all the population increase in Imperial County between 2000 and 2017.

Table D- 1: Race/Ethnicity Composition-Regional Comparison

	California	Los Angeles County	San Diego County	Imperial County	El Centro	Brawley	Calexico	Calipatria	Holtville	Imperial	Westmorland
White	37.2%	26.2%	45.6%	10.6%	8.3%	12.2%	1.0%	5.8%	16.8%	17.1%	10.8%
Black or African Am	5.5%	7.8%	4.7%	2.1%	1.4%	1.2%	0.2%	15.0%	0.7%	1.7%	2.5%
Am. Ind/ Alaska Native	0.4%	0.2%	0.4%	0.6%	0.1%	0.3%	0.1%	0.6%	0.0%	0.3%	1.4%
Asian	14.3%	14.4%	11.6%	1.3%	2.2%	0.4%	0.9%	0.7%	0.0%	2.3%	0.4%
Native Hawaiian/Pacific Islander	0.4%	0.2%	0.4%	0.1%	0.2%	0.3%	0.0%	0.6%	0.0%	0.0%	0.0%
Other Races	3.3%	2.6%	3.6%	0.9%	0.8%	1.8%	0.1%	1.6%	0.4%	0.6%	2.2%
Hispanic or Latino	39.0%	48.5%	33.7%	84.2%	87.0%	83.7%	97.8%	75.7%	82.1%	78.0%	82.6%

Source: ACS 2013-2019 5-year estimates

As explained above, dissimilarity indices are measures of segregation, with higher indices meaning higher degree of segregation. In Imperial County, all minority (non-white) residents combined are considered moderately segregated from White residents (index is 41.76 in 2020). However, the dissimilarity index between Black and White residents is considered a high degree of segregation (61.18). All dissimilarity indices have decreased in the past 30 years in the County, except for Blacks/Whites, for which the dissimilarity index increased by close to 20 points, indicating increasing segregation among residents of non-White races from Whites. Given that the population of all races decreased between 2000 and 2017, the increase in the dissimilarity index for Blacks/Whites indicates blacks are disproportionately segregated.

Table D- 2: Dissimilarity Indices for Imperial County (1990-2020)

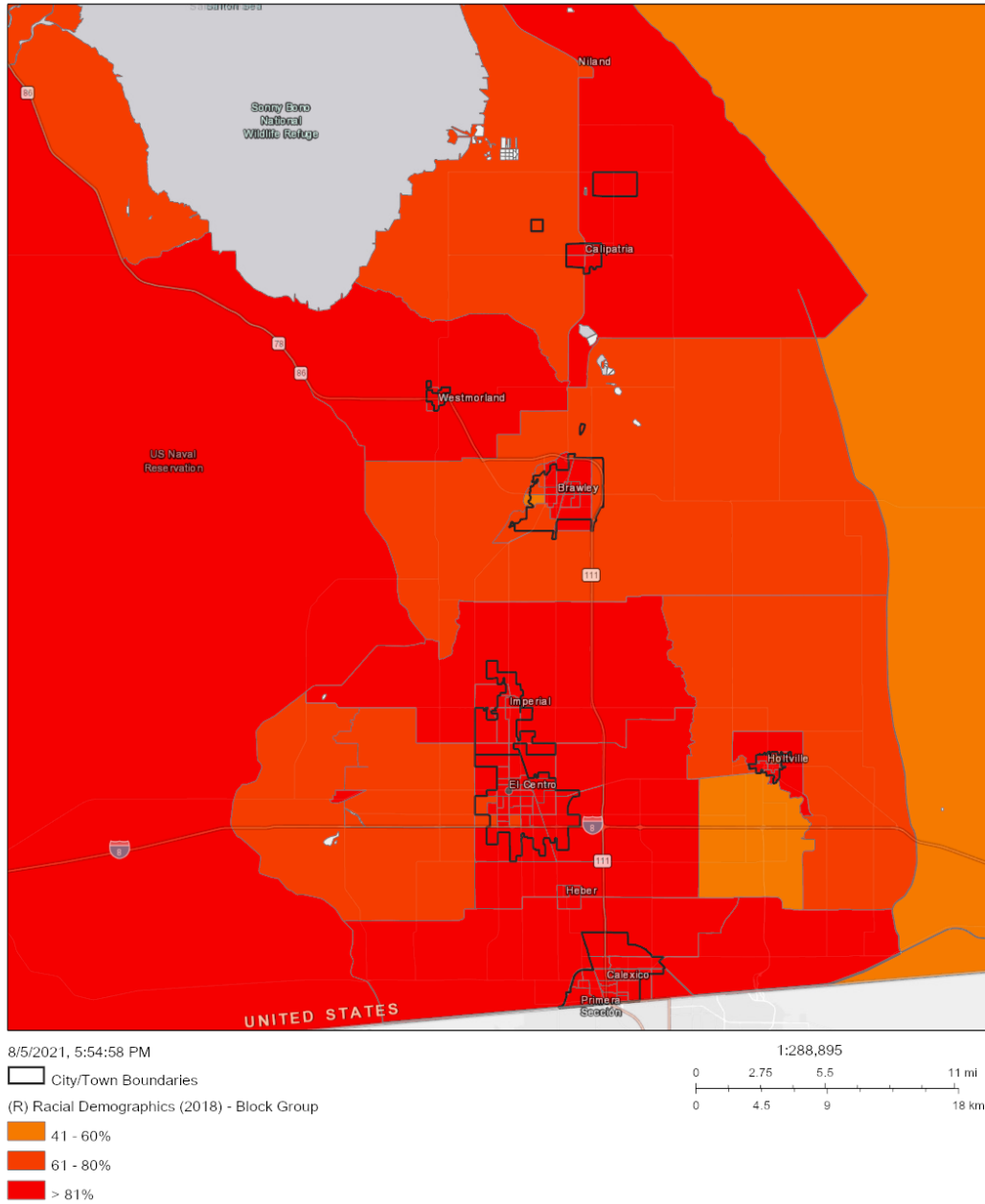
	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	43.79	40.2	38.4	41.76
Black/White	43.49	55.26	54.97	61.18
Hispanic/White	45.39	43.45	40.91	44.3
Asian or Pacific Islander/White	38.26	40.53	28.4	36.98

Sources: HUD Dissimilarity Index, 2020.

Figure D-1 below shows the concentration of minority population in the County is widespread across Imperial County. Figure D-2 shows census tracts in Imperial by the racial or ethnic groups that make up the majority of the population. The categories show the percentage population gap between the majority racial/ethnic group and the next largest racial/ethnic group. The more intense the color, the higher the percentage gap between the predominant racial/ethnic group

and the next largest racial/ethnic group. As expected based on the high percentage of Hispanic population (Table D- 1), all Imperial County cities have a high concentration of Hispanic majority census tracts. Overall, Hispanic population predominates the County.

Figure D-1: Minority Concentration by Block Group - Imperial County

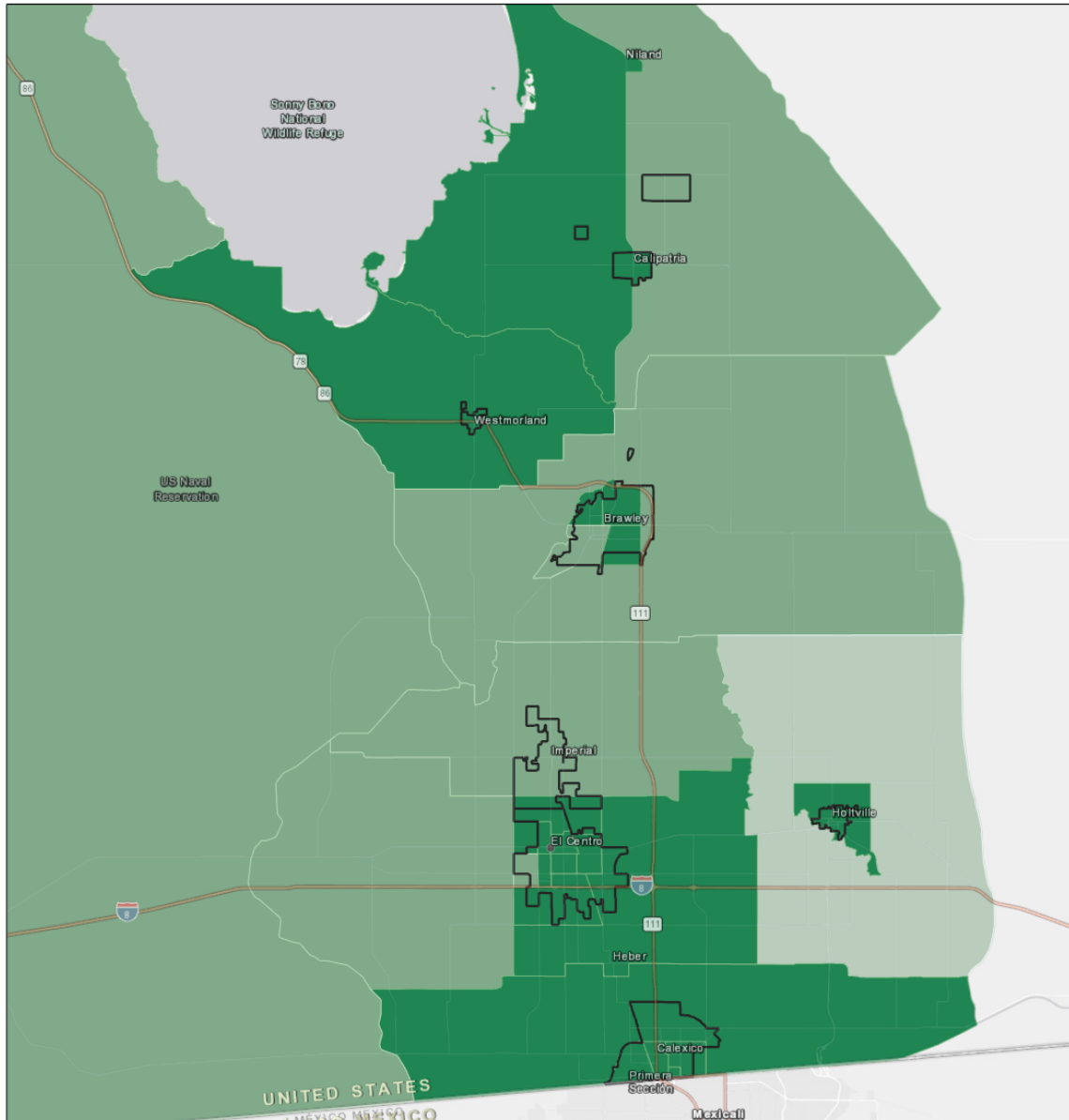


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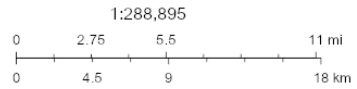
CA HCD

Figure D-2: Racial and Ethnic Majorities by Census Tract - Imperial County



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-  City/Town Boundaries
- (R) Predominant Population - Hispanic Majority Tracts
-  Slim (gap < 10%)
-  Sizeable (gap 10% - 50%)
-  Predominant (gap > 50%)



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Local Trends

Like the County, El Centro's population is mostly Hispanic (87 percent, Table D- 1). As shown in Table D-3, White population has decreased by almost eight percent between 2010 and 2019, while the Hispanic/Latino has grown by a nine percent. The percentage of black population also decreased by two percent in the past decade while most other races did not change in their share of the population.

From 1990 to 2020, while the White and non-White communities in Imperial County have been considered moderately segregated, the White/non-White community in El Centro has scored as low levels of segregation (less than 40). Like the County, segregation between Blacks and Whites is the highest, though the level of segregation in El Centro is considered moderate and has decreased in the past 30 years (compared to the high levels in the County and the increasing trend). The level of segregation between Asian/Pacific Islander residents and White has increased by 20 points during the 30-year period.

Figure D-3 shows that the Hispanic majority population is widespread throughout the entire City. Only once census tracts in the west of the City (bounded by Interstate Highway 8 and Main Street) has a slightly lower concentration of Hispanic population.

Figure D-4 shows that minority concentrations make up more than 81 percent of most census tracts in the City.

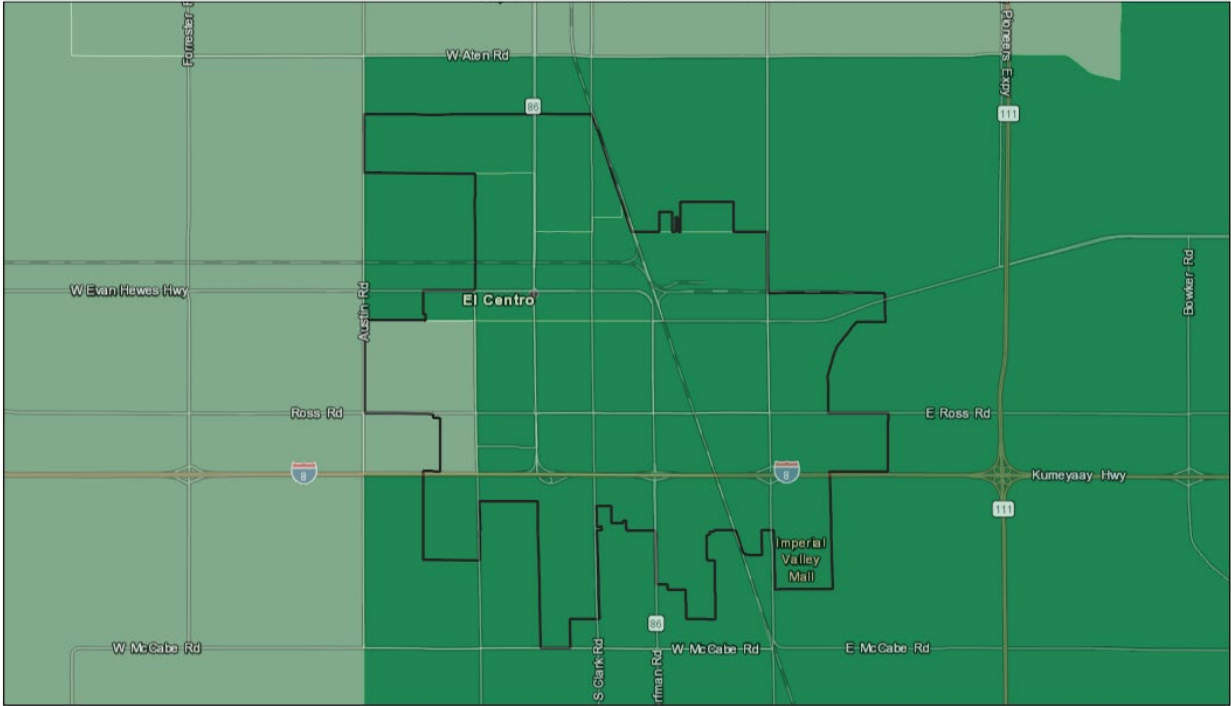
	2010	2019	% change
White alone	16.2%	8.3%	-7.9%
Black or African American alone	3.1%	1.4%	-1.7%
American Indian and Alaska Native alone	0.1%	0.1%	0.0%
Asian alone	2.1%	2.2%	0.1%
Native Hawaiian and Other Pacific Islander alone	0.1%	0.2%	0.0%
Other	0.7%	0.8%	0.1%
Hispanic or Latino:	77.7%	87.0%	9.3%
Total Population	41,581	44,003	5.8%

Source: ACS 2010-2014, 2013-2019 5-year estimates

	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	29.84	30.82	25.42	29.66
Black/White	54.99	46.83	32.96	44.63
Hispanic/White	30.04	31.79	26.12	30.21
Asian or Pacific Islander/White	19.67	17.94	19.43	31.38

Sources: HUD Dissimilarity Indices, 2020.

Figure D-3: Racial and Ethnic Majorities by Census Tract- City of El Centro



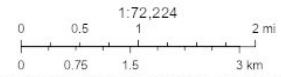
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City/Town Boundaries

Predominant (gap > 50%)

(R) Predominant Population - Hispanic Majority Tracts

Sizeable (gap 10% - 50%)

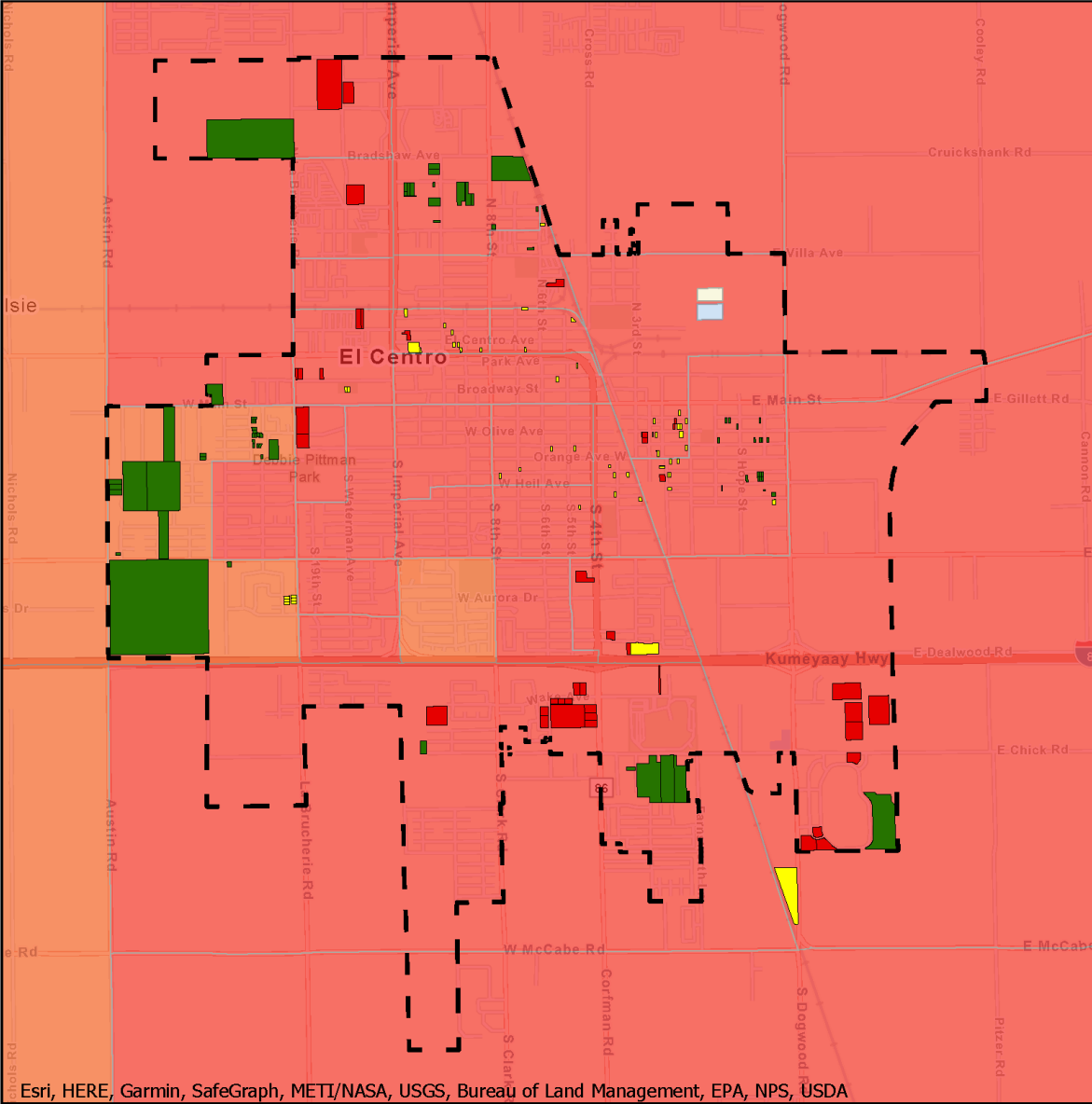


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Figure D-4: RHNA Unit Distribution by Minority Concentration - City of El Centro



Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

City of El Centro Housing Element Sites Inventory with Minority Concentrated Areas of Population

Racial Demographics 2018 (Block Group) Sites Inventory

Percent of Total Non-White Population	Income Level
≤ 20%	Lower
21 - 40%	Moderate
41 - 60%	Above Moderate Income
61 - 80%	City Boundary
> 81%	

N

0 0.5 1 Miles

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affh-data-resources-cahd.hud.arcs.com>

Distribution of RHNA Units by Percent Minority Concentration

As part of the AFFH analysis, the City must show sites identified in the inventory were selected a manner that is consistent with its duty to affirmatively further fair housing (AFFH). This involves an analysis of whether the identified sites serve the purpose of replacing segregated living patterns with integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.

As shown in Figure D-4, the minority population in most census block groups of the City is over 81 percent. A few block groups along the City's western boundaries north of Interstate Highway 8 have a lower minority concentration. About 20 percent of all RHNA sites were located in these areas, comprising 49 percent of the City's above moderate RHNA units and three percent of moderate units. Since most the City's census block groups have a minority concentration over 81 percent, the majority of RHNA units are in census block groups with these concentrations of minorities (Table D-5). Approximately 80 percent of all RHNA units are located in these census tracts, with 100 percent of lower income units, 97 percent of moderate income units, and 51 percent of above moderate income units in block groups with over 81 percent racial/ethnic minorities.

Table D-5: RHNA Unit Distribution by % Minority Concentration

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
21 - 40%	0.0%	0.0%	0.0%	0.0%
41 - 60%	0.0%	0.0%	0.0%	0.0%
61 - 80%	0.0%	2.7%	49.3%	19.6%
> 81%	100.0%	97.3%	50.7%	80.4%
Total	1,903	437	1,498	3,838

Persons with Disabilities

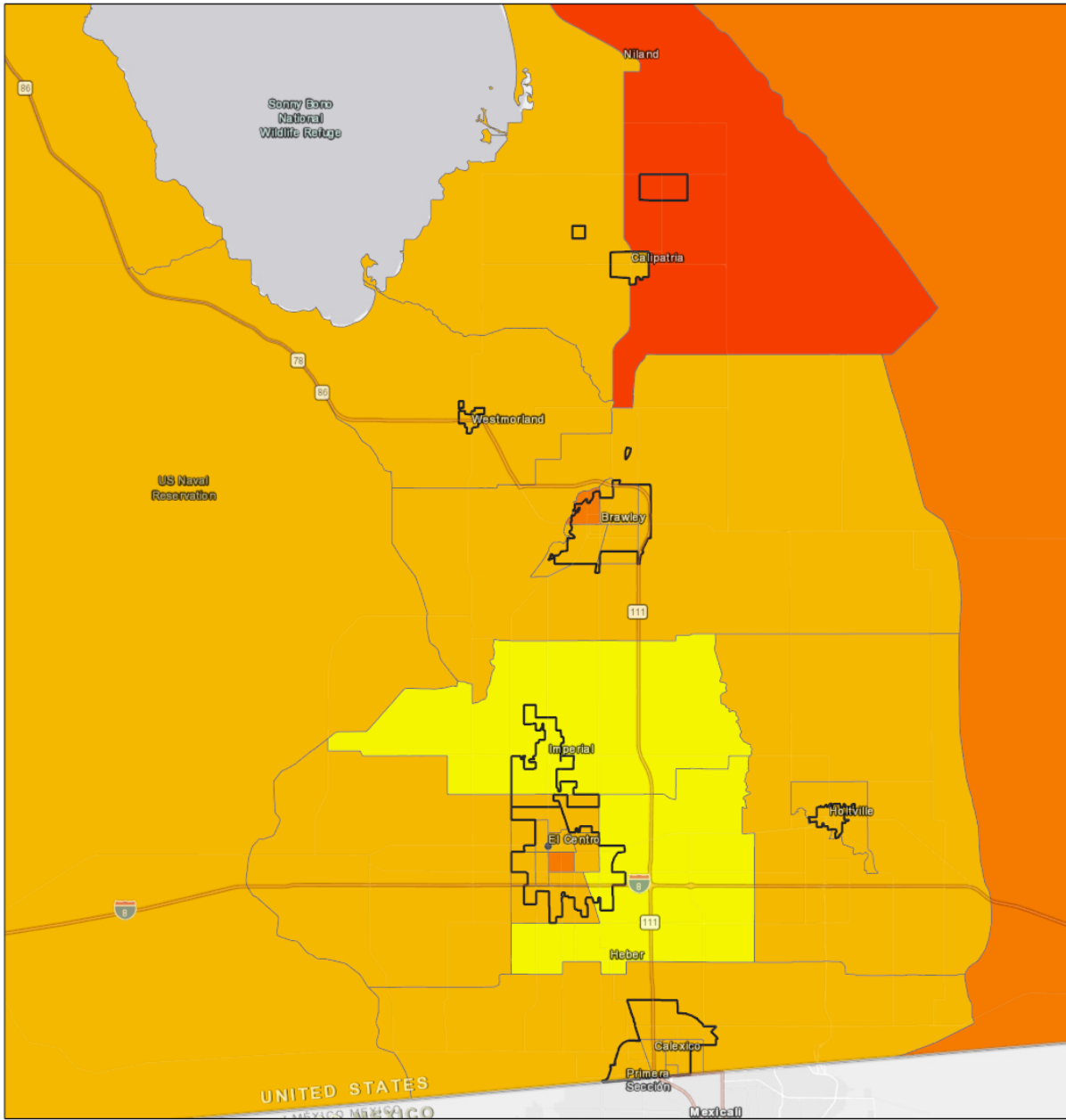
Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trends

Imperial County has a higher share of population with disabilities (14.4 percent) compared to the state (10.6 percent) and the nearby Los Angeles and San Diego counties (10 percent). According to the 2015-2019 ACS, jurisdictions in the County have proportions of population with disability ranging from 7.8 percent in Imperial to 17 percent in Brawley.

Figure D-5 shows the population with disabilities census tracts in Calipatria (where over 40 percent of the population has a disability) followed by one census tract in Brawley and El Centro each (where between 20 and 30 percent of the population has a disability). For most census tracts in the region, about 10 to 20 percent of the population has a disability. Only a few census tracts in the region, in Imperial and surrounding El Centro, have a population with disability less than 10 percent.

Figure D-5: Population with Disabilities- Region



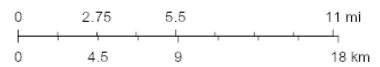
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City/Town Boundaries

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

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%



Local Trends

El Centro the third highest proportion of population with a disability (16.2 percent) in the County after Brawley (17.4 percent) and Holtville (16.2 percent). The City also has a higher population of persons with disabilities than the County (14.4 percent). Within the City, the population with disabilities is concentrated in the census tract in the center of the City, bounded by W Main Street to the north, W Ross Avenue to the south, S Imperial Avenue to the west, and 4th Street to the east. In this census tract, between 20 and 30 percent of the population has a disability.

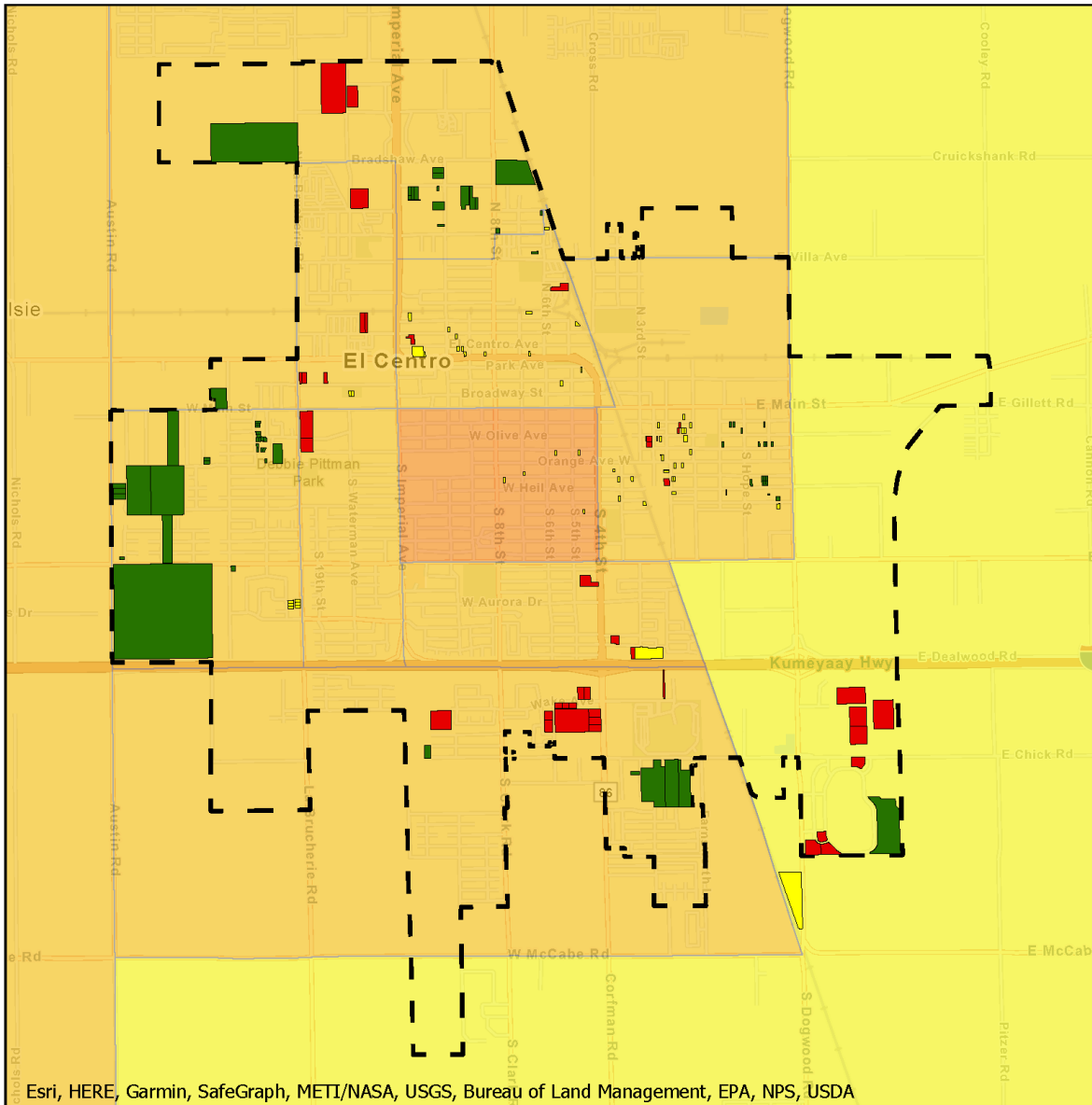
Distribution of RHNA by % Population with Disabilities

Most census tracts in the City have a population between 10 and 20 percent of persons with disabilities. Since this concentrated of persons with disabilities is most common, most RHNA units (72 percent) are in tracts where the population of persons with disabilities is between 10 and 20. About 28 percent of all RHNA units are located in tracts with a population of less than 10 persons with disabilities. Lower income RHNA units also have a similar distribution as all RHNA units, with 65 percent of lower income units are located in census tracts with a population with a disability between 10 and 20 percent and a 35 percent in tracts with the lower concentration of persons with disabilities. Less than one percent of units (11 units) are located in the tract with the highest concentration of persons with disabilities. These units are moderate income.

Table D-6: RHNA Unit Distribution by % Population with Disabilities

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 10%	34.9%	51.9%	11.3%	27.6%
10% - 20%	65.1%	45.5%	88.7%	72.1%
20% - 30%	0.0%	2.5%	0.0%	0.3%
Total Units	1,903	437	1,498	3,838

Figure D-6: RHNA Unit Distribution by Concentration of Persons with Disability



Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

City of El Centro Housing Element Sites Inventory with Disability Concentrated Areas of Population

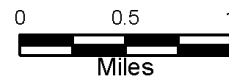
Population with a Disability (Tract) - ACS (2015-2019) Sites Inventory

B18101_calc_pctDE

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%
- > 40%

Income Level

- Lower
- Moderate
- Above Moderate Income
- City Boundary



Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affirmative-resources-calhd.hud.orgis.com>

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in an apartment complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law.

Regional Trends

According to the 2015-2019 ACS (Table D-7), 41 percent of households in Imperial County have children under the age of 18. This share is higher than the share of households with children observed in the state (34 percent) and in Los Angeles and San Diego County (33 percent for both). The percentage of households with children in Imperial County range from 41 in Westmorland to 51 percent in Imperial. Imperial County also has a higher percentage of female-headed households with children (62 percent) compared to the state (59 percent) and neighboring counties (55 percent in Los Angeles and 58 percent in San Diego County). Within Imperial County, over 75 percent of households have children in the cities of Brawley, Imperial, and Westmorland.

	California	Los Angeles County	San Diego County	Imperial County	El Centro	Brawley	Calexico	Calipatria	Holtville	Imperial	Westmorland
All HH	34.4%	33.0%	33.1%	41.6%	42.0%	45.0%	46.4%	43.2%	46.6%	50.5%	41.3%
Married HH	47.0%	47.4%	46.2%	52.0%	51.5%	53.3%	56.0%	51.8%	67.9%	58.2%	48.9%
Single Male-Headed HH	53.0%	48.8%	53.4%	50.3%	46.4%	41.1%	58.9%	54.5%	84.5%	66.4%	72.7%
Single female-headed HH	58.5%	54.8%	58.5%	61.9%	59.3%	75.4%	61.1%	62.1%	51.0%	79.6%	75.6%
Nonfamily	0.8%	0.6%	0.7%	1.1%	1.9%	0.0%	2.6%	0.0%	0.0%	0.0%	0.0%
all HH	34.4%	33.0%	33.1%	41.6%	42.0%	45.0%	46.4%	43.2%	46.6%	50.5%	41.3%
Source: ACS 2015-2019 5-year estimates											

Figure D-7 and Figure D-8 shows the distribution of children in married households and single female headed households in the region. Darker colors indicate a higher percentage of children in married-couple households or single female-headed households per tract. Most census tracts in major jurisdictions like Imperial, Holtville, and Calexico have between 20 and 40 percent of the children population in married-couple households. The highest concentration of children in married people households is found in a few tracts in El Centro. Many census tracts in the eastern and western county appear to have a high concentration of children in married households. It is likely that low population in these areas (which are mainly rural plots) skew the percentages. While children in married-households appear to be uniform across most of the County's jurisdictions, children in female headed households are more notably concentrated in El Centro and Brawley (Figure D-8).

Figure D-7: Children in Married Households- Region

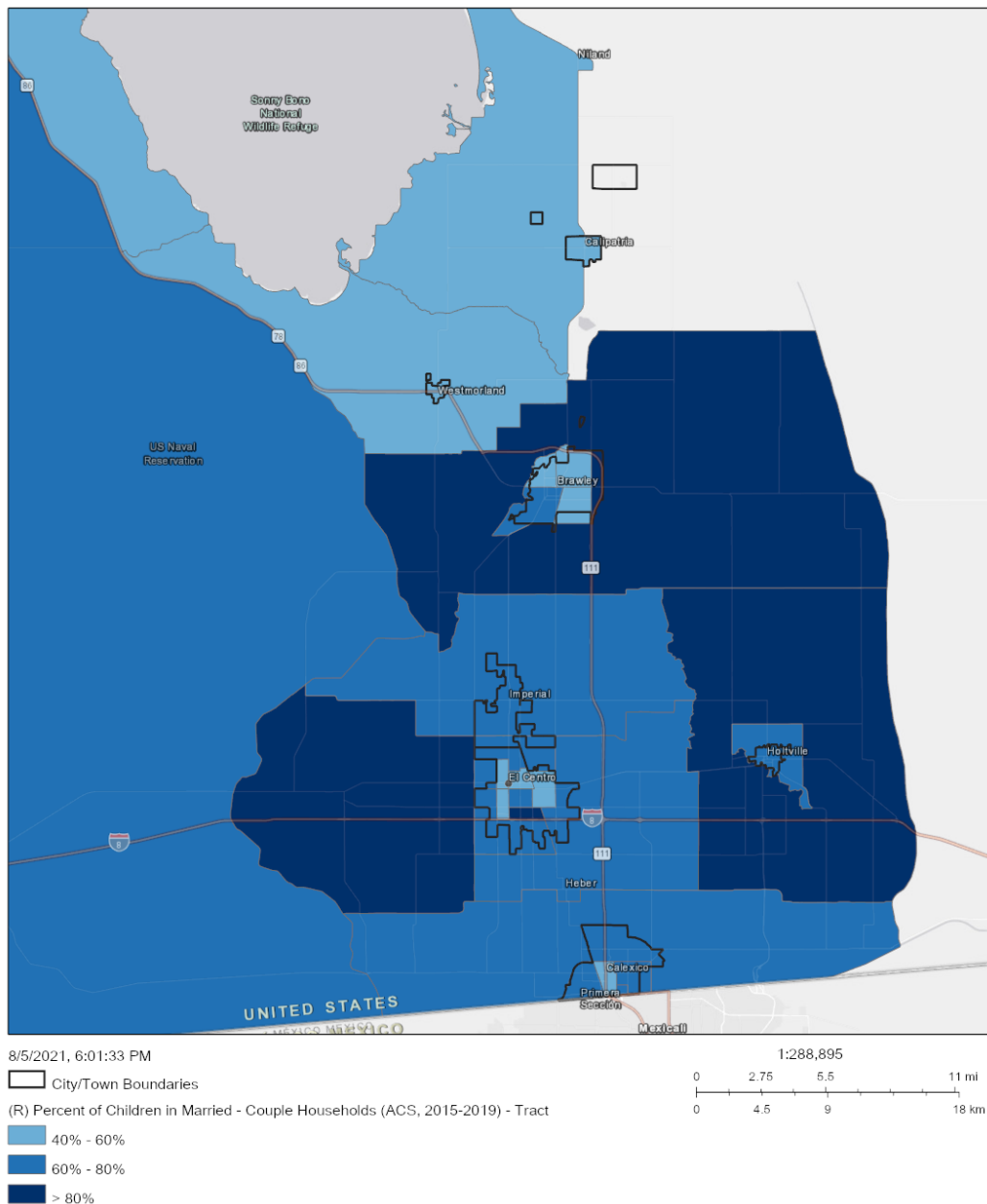
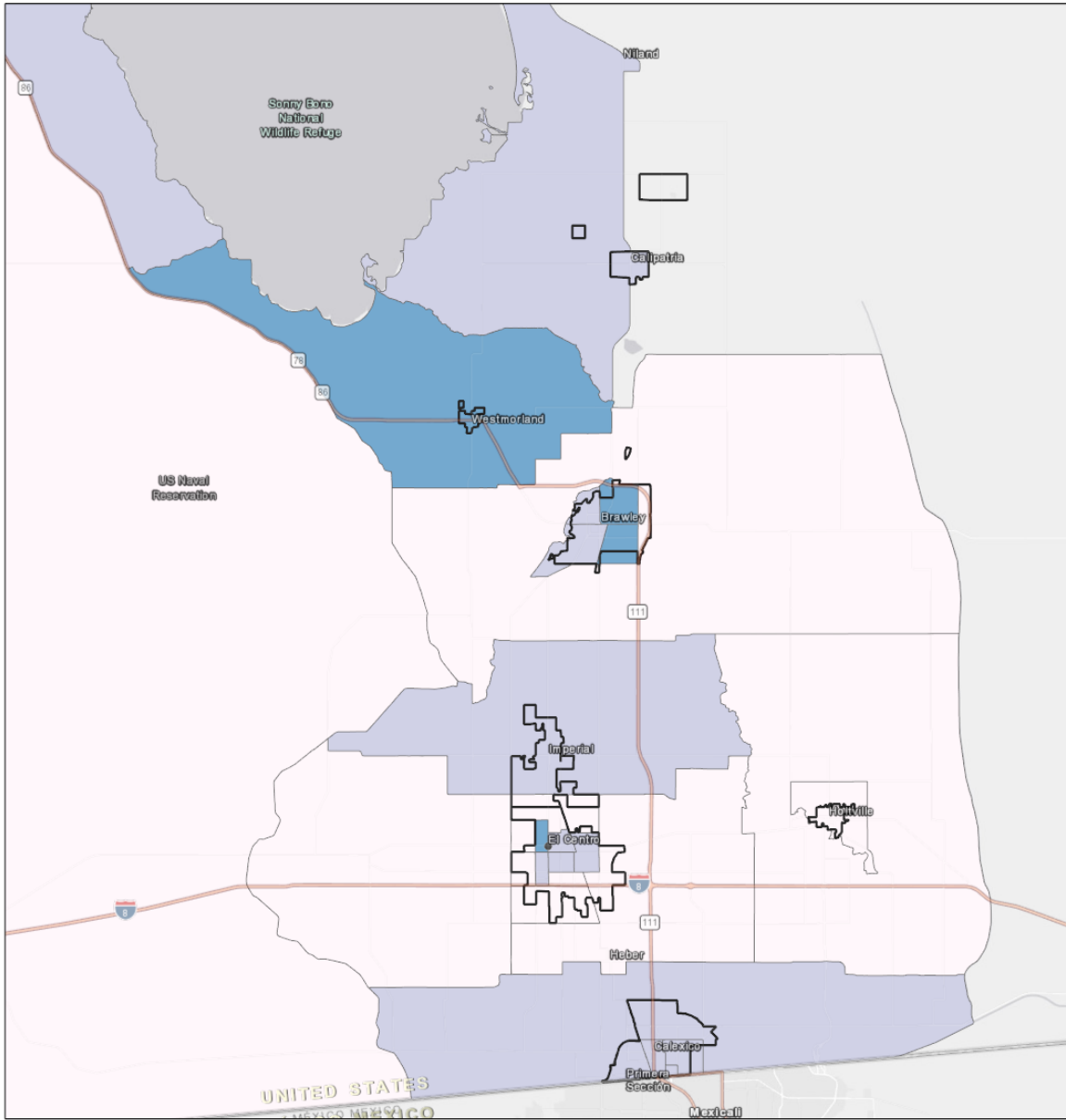


Figure D-8: Children in Single Female-Headed Households- Region



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City/Town Boundaries

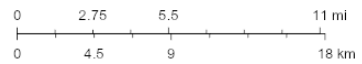
(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

≤ 20%

20% - 40%

40% - 60%

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Local Trends

Approximately 42 percent of households in El Centro have children, fewer than the surrounding jurisdictions of Imperial (51 percent), Calexico (46 percent), and Brawley (45 percent). According to the HCD AFFH map in Figure D-9, children in married households are most concentrated in a single census tract in the City, north of Interstate Highway 8 and bounded by S. Imperial Avenue to the west and the railroad tracks on the east. In this census tract, over 80 percent of children are in married couple households.

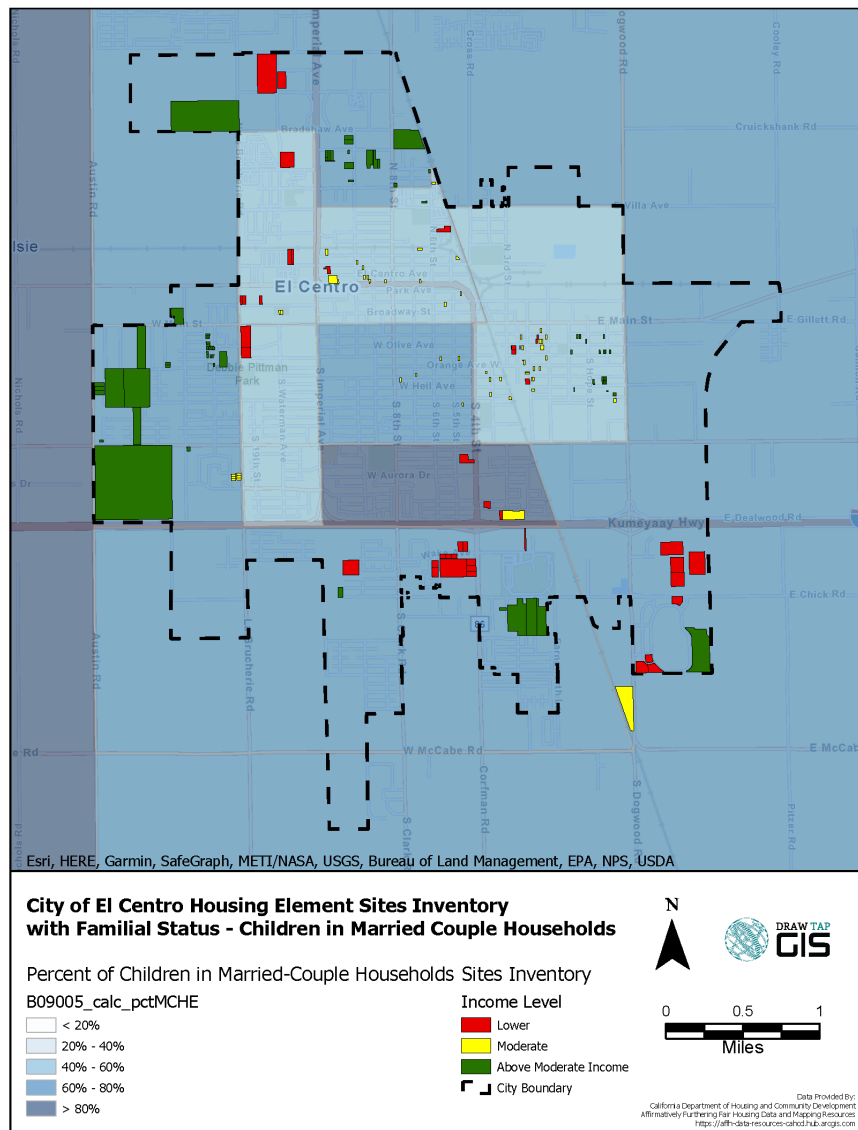


Figure D-10 shows children in single female-headed households are concentrated in the central tracts of the City. In these tracts, between 20 and 40 percent of children are living with a single female householder. The highest concentration of children in female headed households is found along the western city limits of the City, in the tract bound by N. La Brucherie Avenue, Bradshaw Avenue, N. Imperial Avenue, and W. Main Street.

Figure D-9: Children in Married-Couple Households- City of El Centro

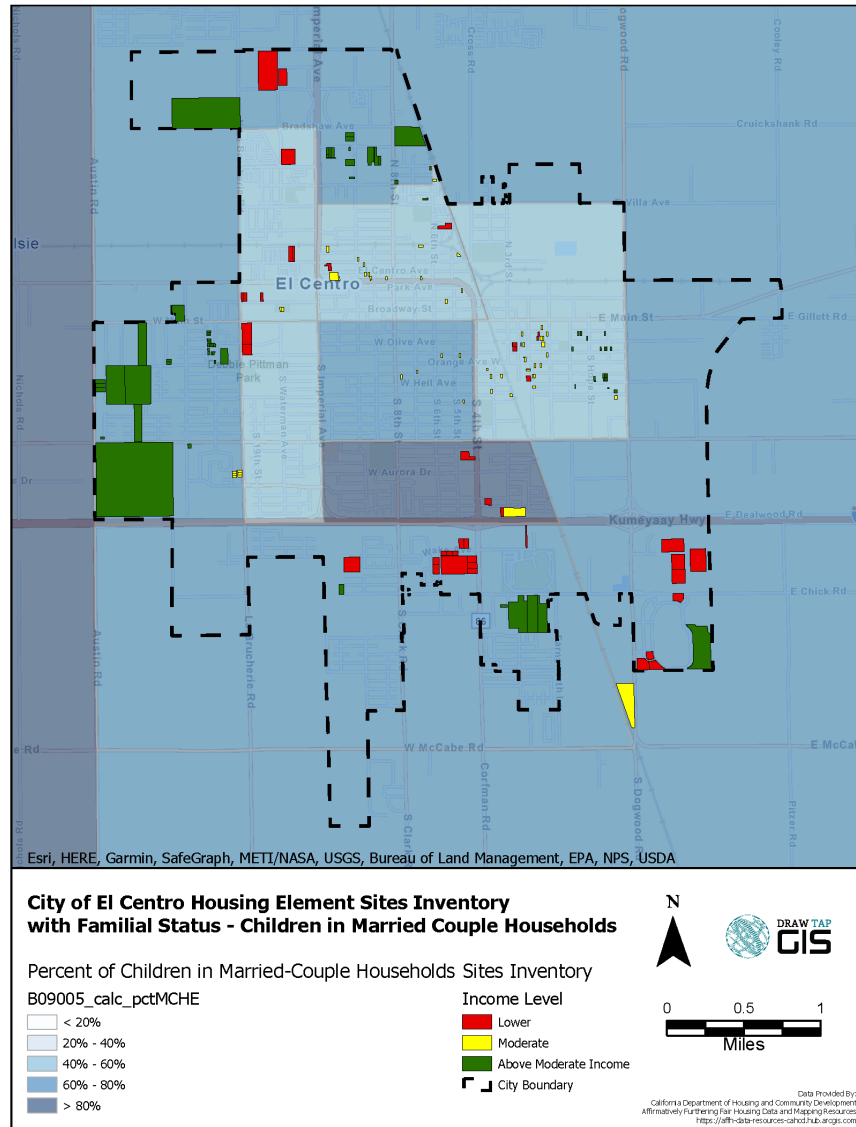
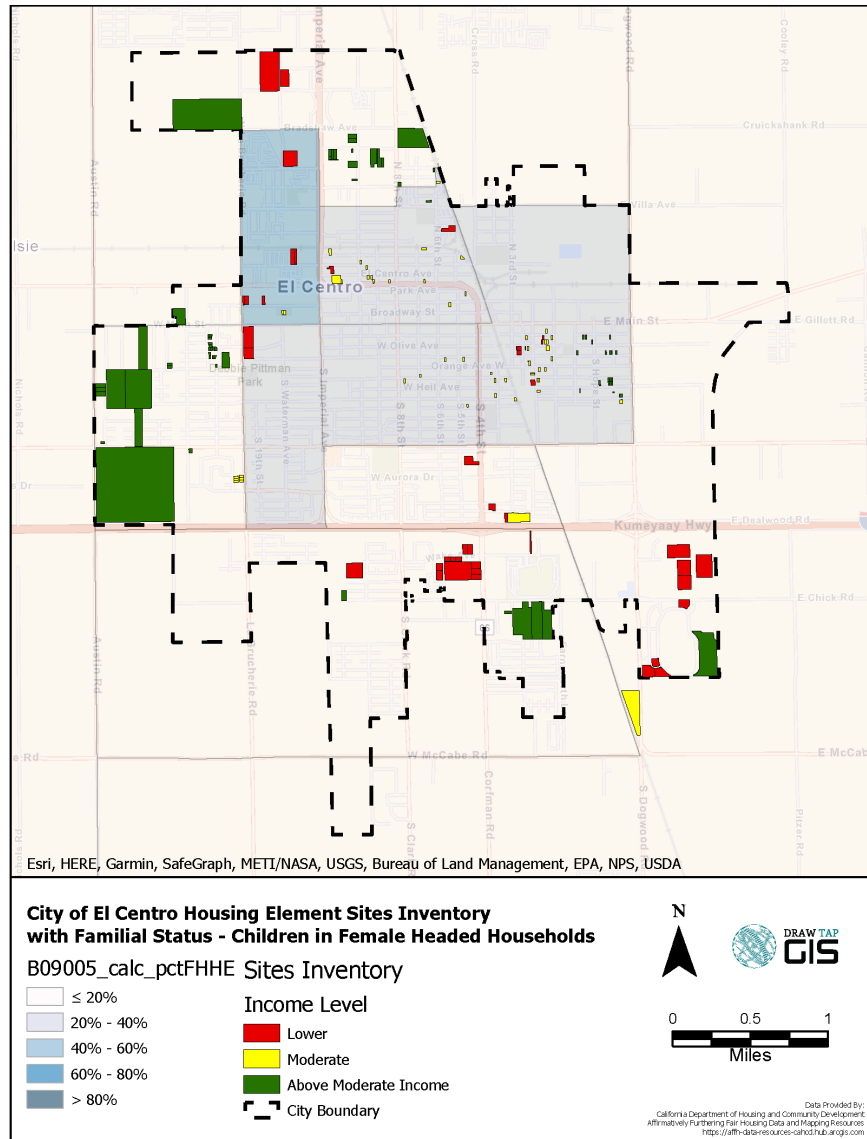


Figure D-10: Children in Single Female-Headed Households- City of El Centro



Distribution of RHNA Units by Familial Status

RHNA units are distributed throughout the City, with smaller mixed-income units in the center and larger mixed-income sites in the southeastern and northwestern parts of the City. In terms of familial status, most RHNA units (82 percent) are in tracts that have between 60 and 80 percent of its children population in married households. Lower income units are distributed similarly, with 75 percent of lower income units in tracts where 60 to 80 percent of children live in married-couple households (Table D- 8).

About 85 percent of all RHNA units are located in tracts with the lowest concentration of children in single female-headed households similar to the 78 percent of lower income RHNA units (Table D- 9). A higher proportion of moderate income RHNA units (34 percent) are located in areas with

a higher concentration of children in female headed households compared to lower income and all RHNA units (11 and 10 percent).

Table D- 8: RHNA Unit Distribution by Percent Children in Married-Couple Households

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20 %	0.0%	0.0%	0.0%	0.0%
20% - 40%	0.0%	0.0%	0.0%	0.0%
40% - 60%	22.0%	33.4%	1.3%	15.2%
60% - 80%	75.1%	57.2%	98.7%	82.3%
> 80%	2.9%	9.4%	0.0%	2.5%
Total Units	1,903	437	1,498	3,838

Table D- 9: RHNA Unit Distribution by Percent Children in Single Female-Headed Households

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20 %	78.0%	64.1%	98.7%	84.5%
20% - 40%	11.4%	34.1%	1.3%	10.0%
40% - 60%	10.7%	1.8%	0.0%	5.5%
60% - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,903	437	1,498	3,838

Income Level

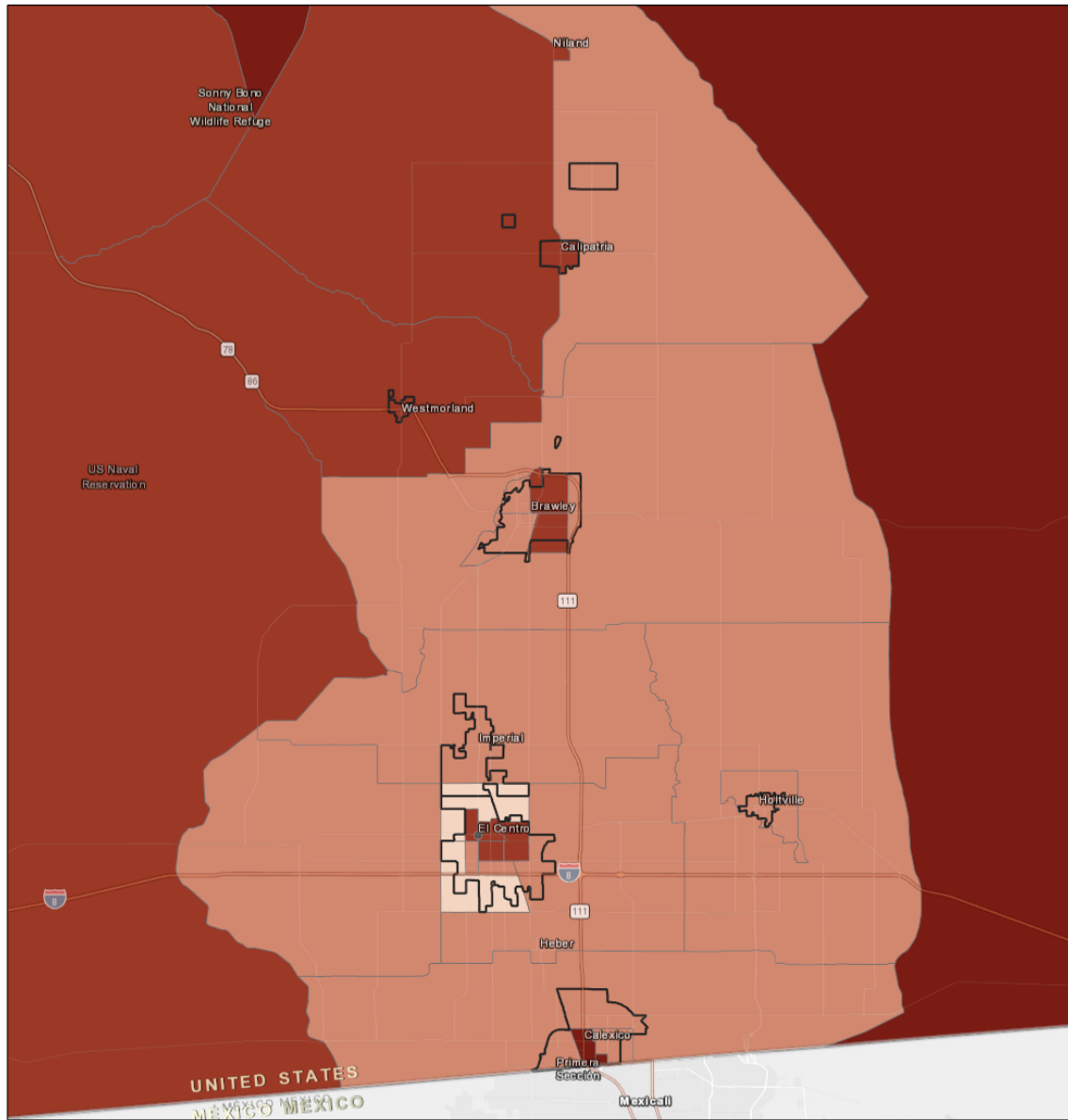
Household income is the key determinant of ability to pay for housing. For many households, their income is too limited to afford existing housing. A larger number of households have incomes too low to afford new housing, as new housing is usually more expensive than existing housing.

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI).

Regional Trends

According to 2013-2017 CHAS data, 49 percent of Imperial County’s households earn low and moderate income. This is a higher percentage than observed in San Diego County (43 percent) and statewide (44 percent) but lower than Los Angeles County (52 percent). Figure D-11 shows that LMI population is concentrated in tracts within the major jurisdictions of the County. However, in the cities of Westmorland, Calipatria, and Holtville, between 50 and 75 percent of the population earns low and moderate incomes in all their tracts. In Brawley, El Centro, and Calexico, the percentage of LMI population per block group varies within the city boundaries, with the percentage of LMI populating ranging from less than 25 to over 80 percent.

Figure D-11: Low and Moderate Income Population – Region



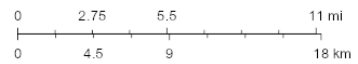
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City/Town Boundaries

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

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%

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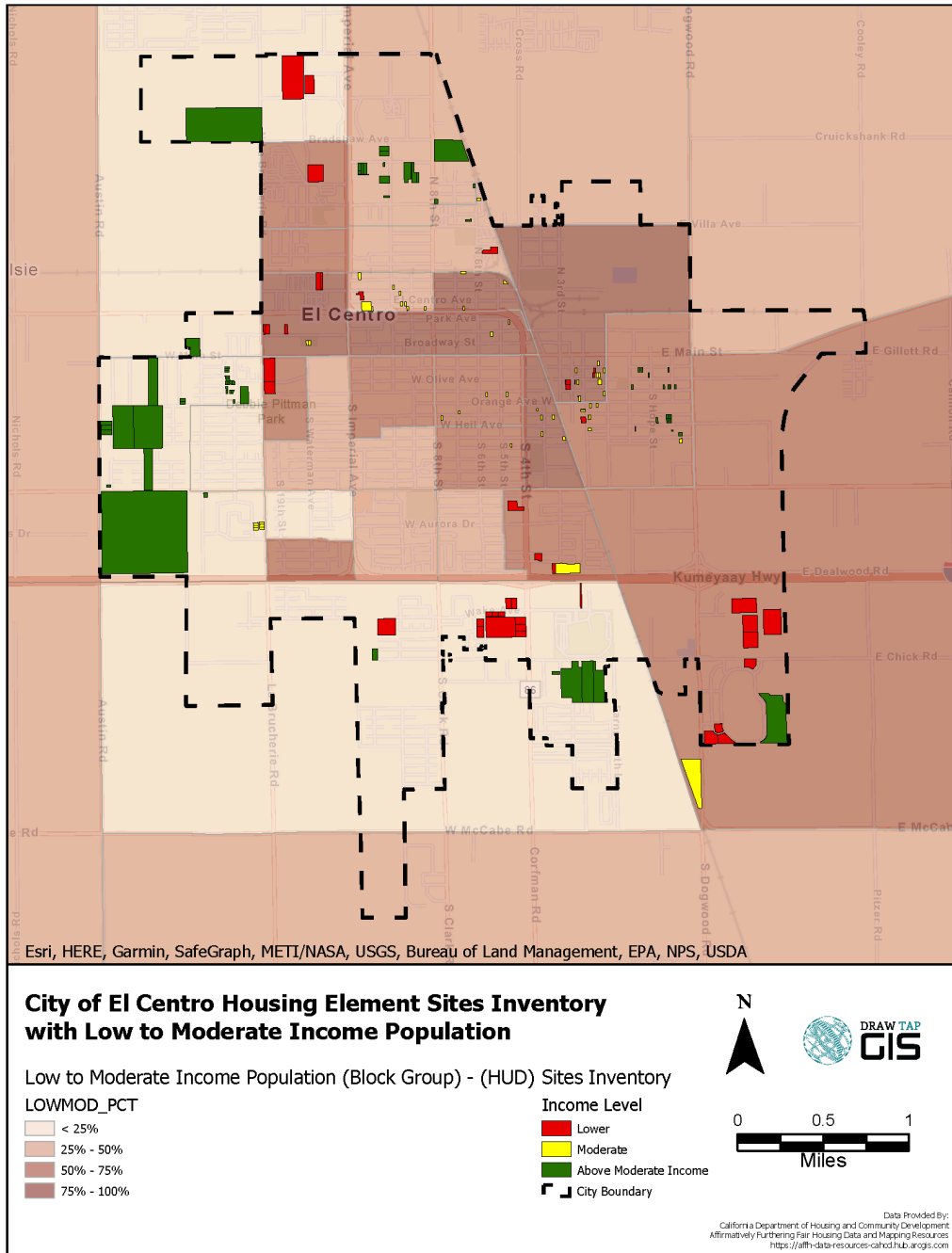
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Local Trends

The City's LMI population (48.7 percent) is similar to the County's (48.8 percent). As seen in Figure D-12, the City of El Centro has many census tracts with a high percentage of LMI population in the center of the City. In these tracts, between 50 and 75 percent of the population is LMI. Census tracts with the second highest concentration of LMI population (where 25 to 50 percent of the population earns low and moderate incomes) are concentrated in the southeastern tracts of the city, east of La Brucherie Avenue.

Figure D-12: Low and Moderate Income Population- City El Centro



Distribution of RHNA Units by % Low and Moderate Income Population

RHNA units mostly distributed in census tracts that have less than 25 percent LMI population (52 percent of units) and tracts that have 50 to 75 percent LMI population (39 percent of units). This makes sense given that most census tracts fall into either one of these two categories. In an effort to encourage mixed-income neighborhoods, about 40 percent of lower income units are located in census tracts with the lowest percent of LMI persons (less than 25 percent). However, given the prevalence of tracts with higher LMI concentration, 53 percent of lower income units are also located in tracts with 50 to 75 percent LMI persons. Only six percent of lower income units are sited in tracts with the highest concentration of LMI persons.

Table D- 10: RHNA Unit Distribution by LMI Population

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 25%	40.2%	2.7%	81.6%	52.1%
25% - 50%	0.8%	13.5%	5.9%	4.2%
50% - 75%	53.4%	68.9%	12.5%	39.2%
75% - 100%	5.6%	14.9%	0.0%	4.5%
Total Units	1,903	437	1,498	3,838

C. Racially and Ethnically Concentrated Areas

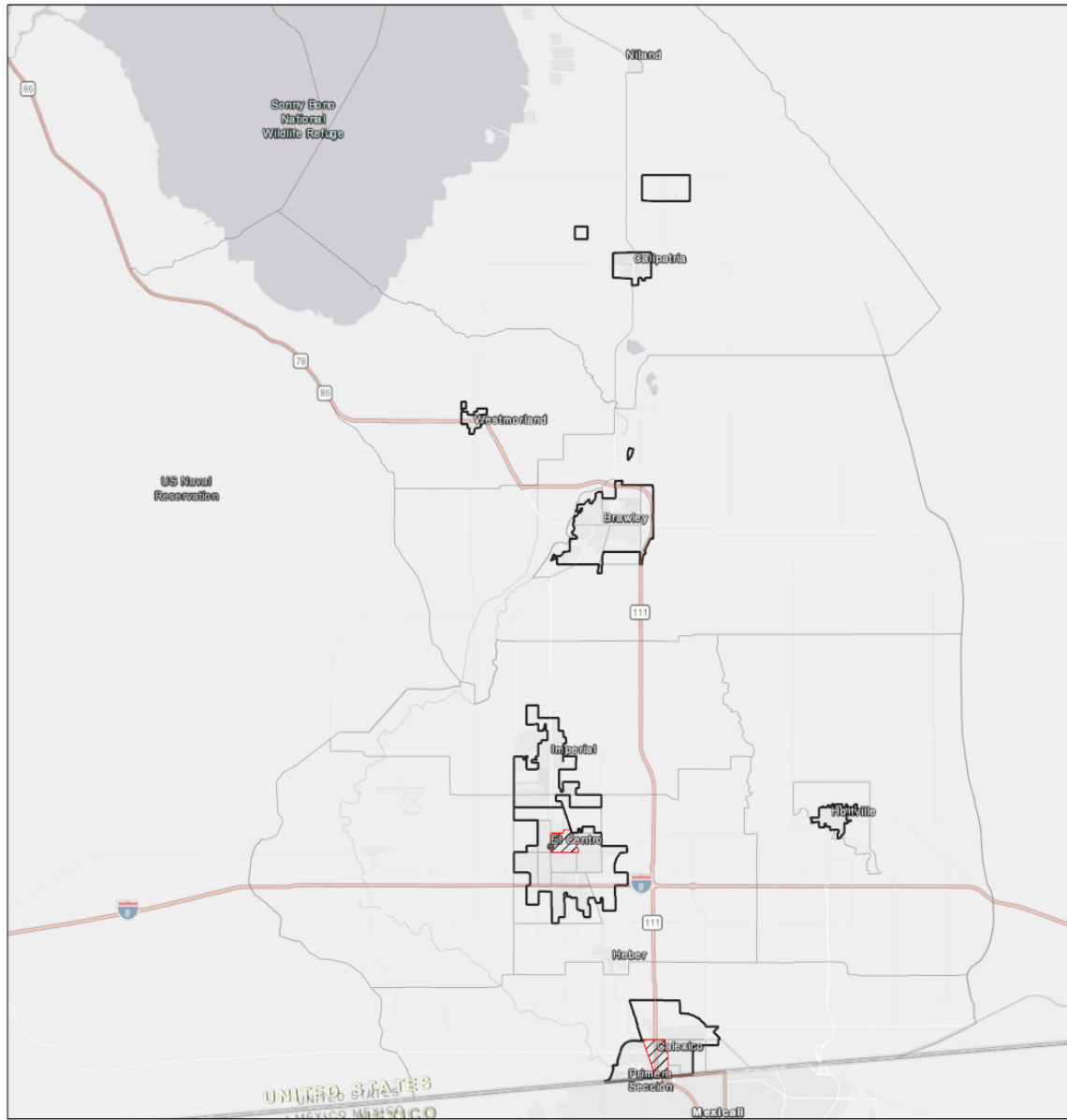
Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

In an effort to identify racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower.

Regional Trends

There are two R/ECAPs located within the County- in Calexico and El Centro (Figure D-13).

Figure D-13: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) - Region



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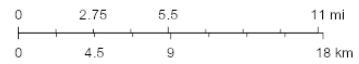
City/Town Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAP'S" (HUD, 2009 - 2013) - Tract

0 - Not a R/ECAP

1 - R/ECAP

1:288,895



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CA HCD

Local Trends

There is one R/ECAP identified in the City of El Centro, in the northern part of the City (Figure D-14). This tract (Census Tract 115) is bounded by Main Street to the South, N. Imperial Avenue to the west, Villa Avenue (unimproved) and Pico Avenue to the North, and the Union Pacific Railroad to the west. While the area is aggregated as single census tract, it consists of four separate residential neighborhoods separated by major roadways, railroads, and public facilities. Below is a list of distinct areas within the R/ECAP area based on time of development and residential structure composition.

- South of Adams Avenue Area – This residential area consists of parcels located on Park Avenue and Commercial Avenue between N. 12th Street and N. 4th Street. According to subdivision maps, development of this area occurred in the 1900s and 1910s. Residential development in this area is a mixture of single-family residences and two to four unit multifamily buildings.
- North of Adams Avenue Area – This residential area consists of properties north of Adams Avenue and south of the Union Pacific Railroad. Parcels are located on El Centro Avenue, Euclid Avenue, and Woodward Avenue. Development of this area began in the 1910s. Residential development in this area is a mixture of single family residences and two to four unit multifamily buildings.
- West of 8th Street Area – This residential area consists of properties north of the Union Pacific Railroad and west of 8th Street. Parcels are located on Oleander Avenue, Rose Avenue, Scott Avenue, and Stacy Avenue. Development in this area began in 1950s for the area between 8th Street and 12th Street though the late 1970s for the area west of 12th Street. Residential development in this area consists substantially of single family residences.
- Kennedy Middle School Area – This residential area includes the properties to the north and east of Kennedy Middle School. It consists of several mobile home parks along 8th street between the Union Pacific Railroad and Villa Avenue, a single family and condominium neighborhood north of Villa Avenue and south of Pico Avenue. Mobile home developments were established before the 1960s while the single family development and condominium areas were constructed in the 1980s.

An important geographic quality of Census Tract 115 is that only about 44 percent of the tract allows residential uses while the remaining is a mix of commercial and manufacturing. Despite limited residential area, the tract’s population has one of the highest concentrations per square mile among neighboring census tracts (Table D- 11).

Table D- 11: Persons per Square Mile in R/ECAP and Neighboring Tracts

Census Tract	Population	Size (mi ²)	Persons per mi ²
115	6,227	0.8	7,859
112.01	6,221	5.6	1,116
112.02	5,626	0.6	8,861
114	4,570	1.5	2,984
116	5,728	0.8	7,248

Source: ACS 2013-2019 5-year estimates

As expected due to the nature of being identified as a R/ECAP, census tract 115 is located among the central area of the City that disproportionate concentration of lower and moderate income population, the lowest economic outcomes, and low educational outcomes (see Figure D-12, Figure D- 21, Figure D- 26 in the next sections). Census tract 115 also has disproportionate needs compared to the rest of the City with the highest rates of overcrowding (17 percent), the highest concentration of the renter population (Figure D- 15) and the highest concentration of cost burdened renters (59 percent), and is considered a vulnerable community to displacement (see Figure D-31, Figure D-33, Figure D-35, Figure D- 37 in the sections below). In addition, the 2019 AI found that census tract 115 had the highest concentration of HCV holders- almost one-third of all HCV householders reside in Census Tract 115.00 (See [Housing Choice Vouchers](#) section for more information).

According to the ACS, median income in this area has increased by about \$8,000 from \$24,000 (2019 inflation adjusted dollars) in 2013 to \$32,480 in 2019. Poverty rates have decreased in the census tract in the same time period with 41.6 percent of the population under the federal poverty line in 2013 compared to 39.3 percent in 2019. Along with slight improvements in median income and poverty rates, the percent of cost-burdened renter population has decreased between 2014 and 2019. In 2014, 63.7 percent of the renter population was experiencing cost burdens compared to 59.4 percent in 2019.

While these income and cost burden improvements may be outside City control, the City has invested many resources to improve the quality of life of residents in Census Tract 115 over the past five years through the construction and renovation of community facilities. In September 2019, the City held the grand opening to the Aquatic Center at 540 Park Avenue that consists of an 8-lane competition pool, a warm-up/instructional pool, a beach activity pool, a lazy river, and the Aquatic Center building all over a 3.5-acre site. The Aquatic Center represents a \$18 million investment within one of the main corridors of Tract 115. Adjacent to the Aquatic Center, the City had invested a total of \$5.7 million with the construction of Sidewinder Skate Park and the Martin Luther King Jr. Pavilion along Park Avenue within Tract 115. In November of 2017, the City acquired Center Point, a 14.07-acre abandoned shopping center at 1140 Imperial Avenue. This will be the home of the new El Centro Public Library that is currently under construction, representing an investment of \$17.4 million by the City and while it is not inside of Tract 115, it is right across the street from it. The City also installed bike lanes on 8th Avenue throughout the entire census tract providing active transportation options.

The City is currently in the process of undergrounding the Date Canal, which runs east/west along Villa Avenue. The undergrounding of the canal will create a healthier and safer community for residents. During that process, the City will connect N. 12th Street from Oleander Avenue to Pico Avenue creating a north/south corridor. The connection will include curb, gutters, sidewalks, and asphalt giving everyone access to what once was a dead end. Both the undergrounding and street connection will total \$3.3 million in infrastructure investments. Another investment that the City is currently working on is a grant application to create a parking lot at Frazier Field (baseball park within the census tract) for dust control purposes and to reduce air pollution. This investment would be close to \$350,000.

Distribution of RHNA Units by R/ECAPs

Only 91 RHNA units are located in the census tract with R/ECAPs, comprising only two percent of all RHNA units. These units are varied-income, but are mostly moderate income units (75 units), followed by lower income (15 units), and above moderate (one unit).

Figure D-14: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) - El Centro

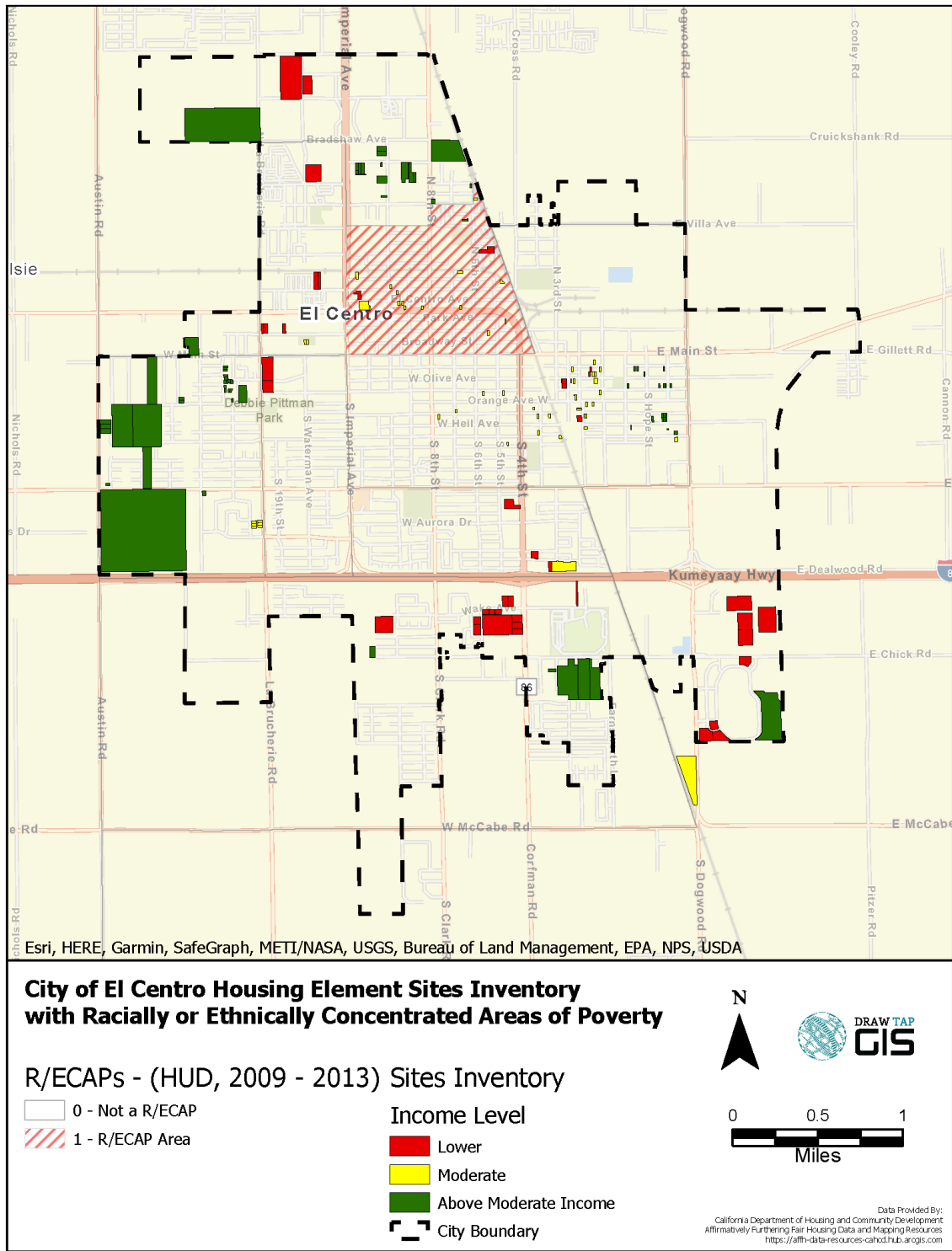
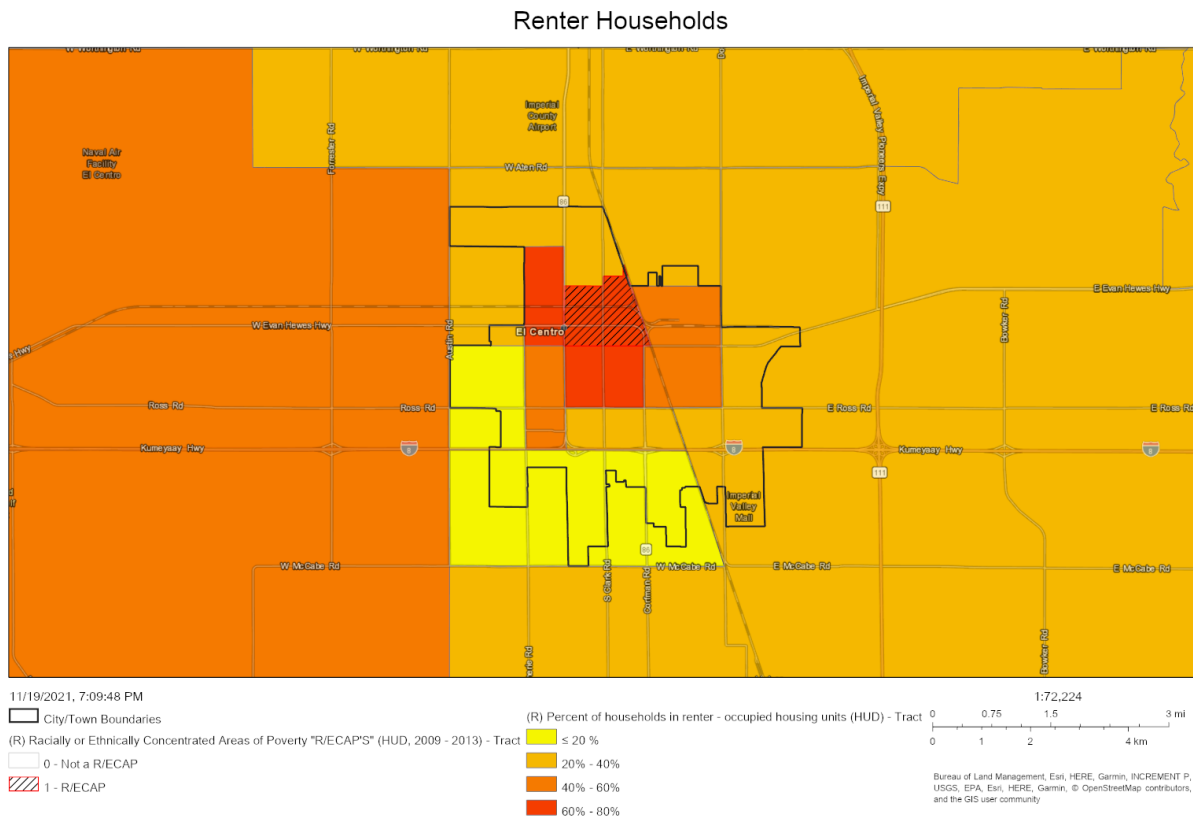


Figure D- 15: Percent Renter Households per Tract- El Centro



CA HCD
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Racially Concentrated Areas of Affluence (RCAs)

While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAs are defined as affluent, White communities. According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.

While HCD has created its own metric for RCAs, at the time of this writing the map on the AFFH tool is not available. Thus, the definition of RCAs used in this analysis is the definition used by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo: "RCAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016).

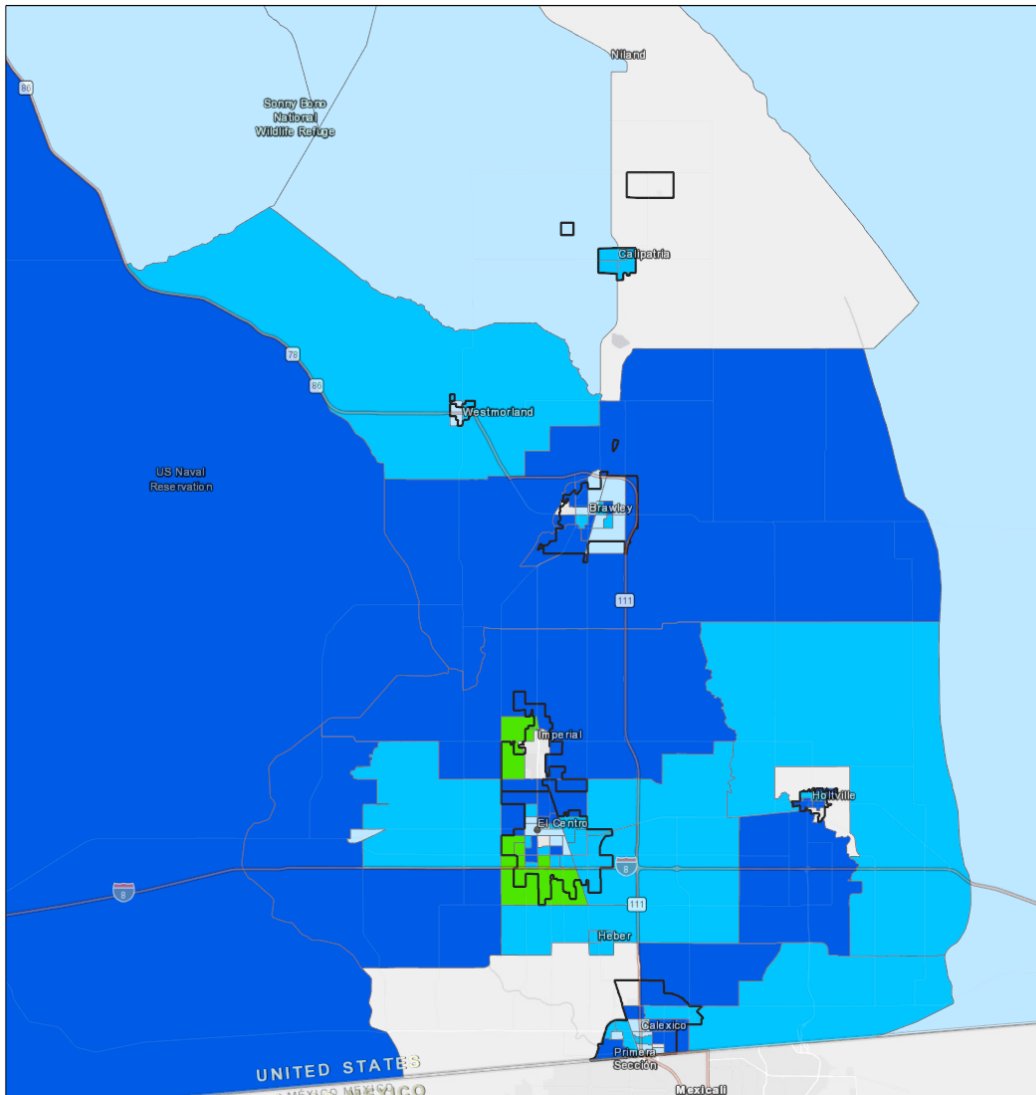
Regional Trends

Figure D-1 and Table D- 1 show that Imperial County has a predominantly Hispanic population. Most block groups have at least 41 percent non-white minority population. This means that in block groups where White population has its highest shares (orange block groups, where

minority is the lowest in the region and ranges from 41 to 60 percent), the maximum percentage white population in these block groups is only 59 percent.

In addition, only a few block groups in the region have a median income of over \$125,000 (Figure D-16). These block groups are located in the northwestern part of Imperial and the southwestern tracts of El Centro. These block groups are predominantly Hispanic/Latino.

Figure D-16: Median Income – Region



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City/Town Boundaries

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

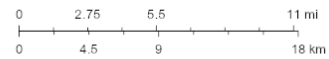
< \$30,000

< \$55,000

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

< \$125,000

1:288,895



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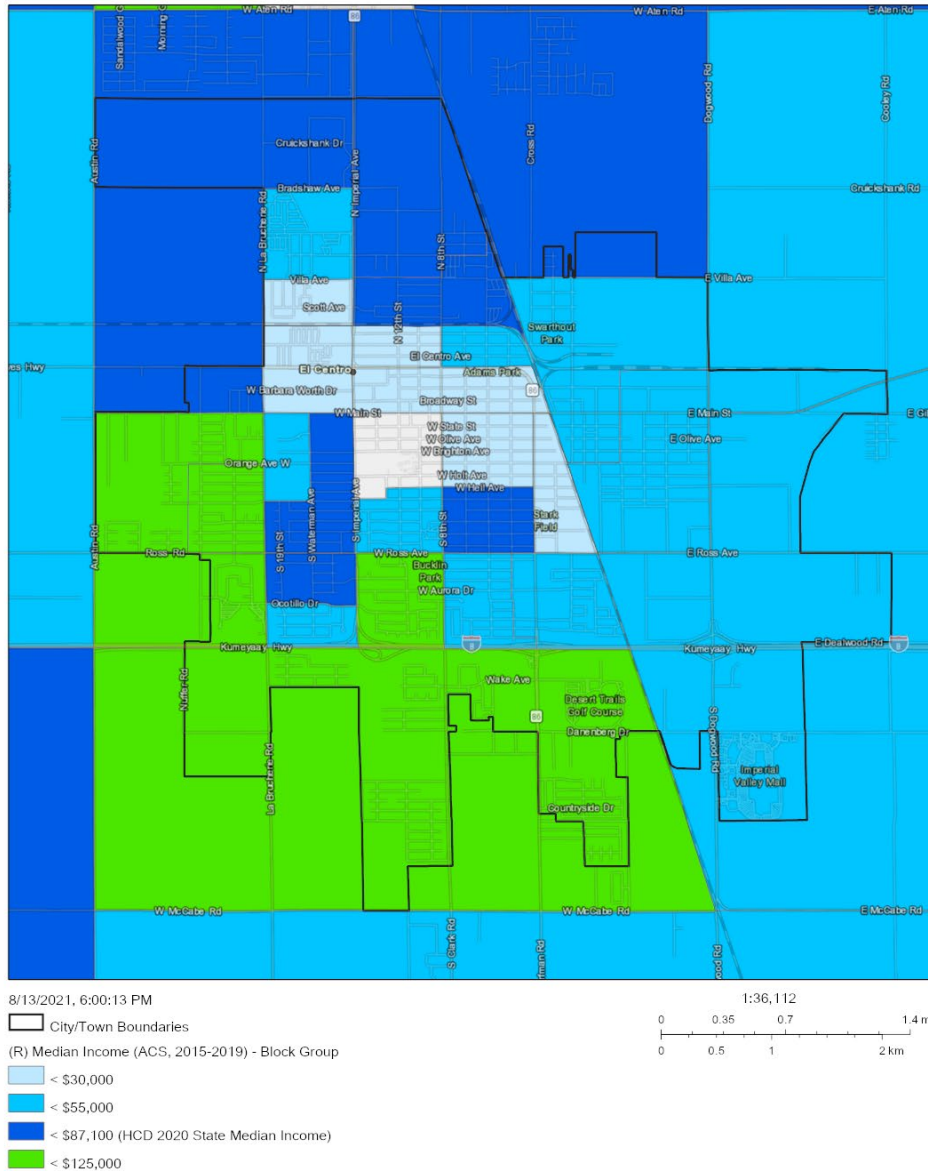
Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of

CA HCD

Local Trends

As discussed previously in the Race/Ethnicity section, most of the block groups in the City of El Centro have at least 41 percent of minority race residents, which are predominantly Hispanic. None of the block groups in the City have over census tracts have over 80 percent White population. The City does have block groups along its southwestern border with median incomes over \$125,000 (Figure D- 17). However, no block group meets the definition of RCAs.

Figure D- 17: Median Income - City of El Centro



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D. Access to Opportunities

Significant disparities in access to opportunity are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table D-12 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty:** Tracts with at least 30 percent of population under federal poverty line;
- **Racial Segregation:** Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Table D-12: Domains and List of Indicators for Opportunity Maps

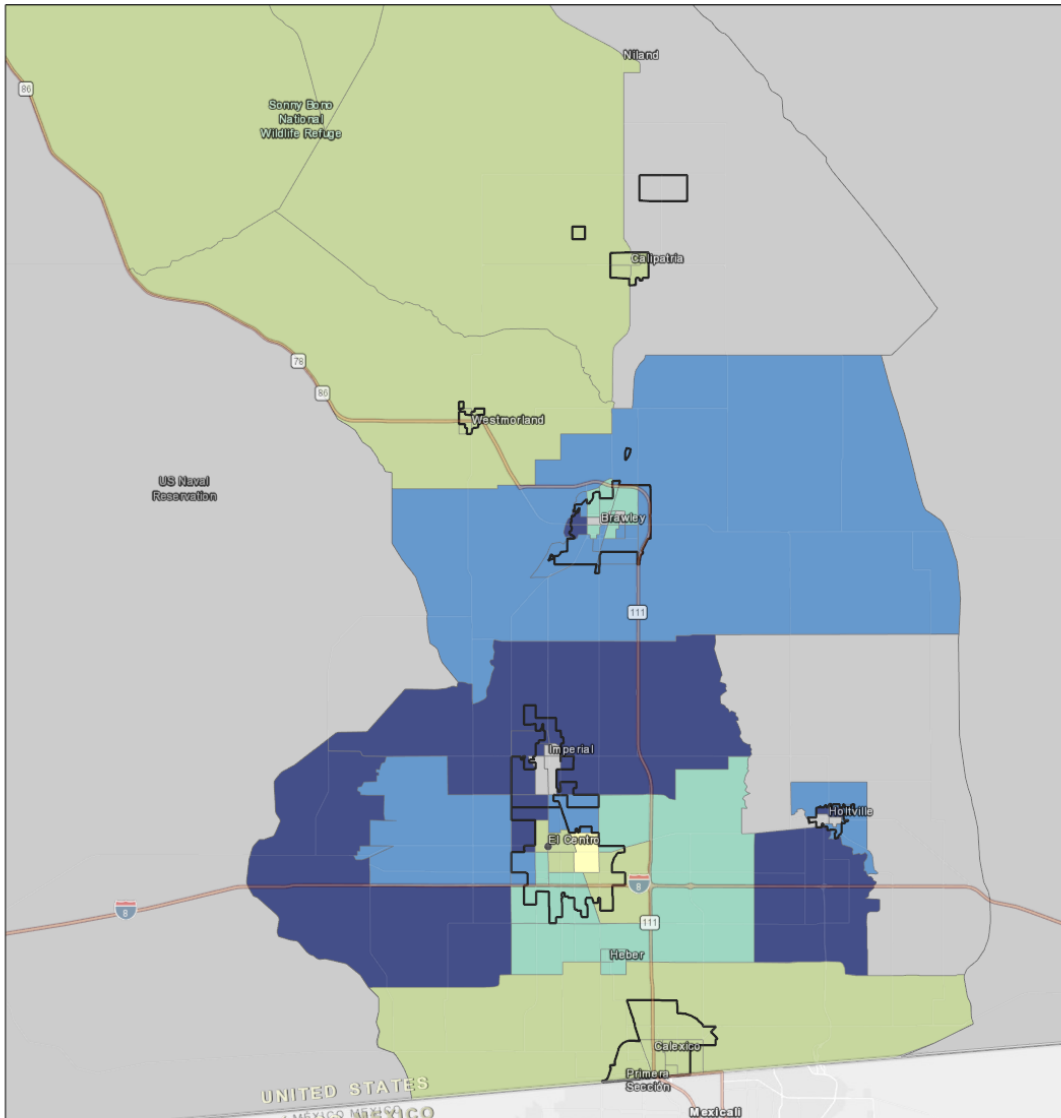
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020

Regional Trends

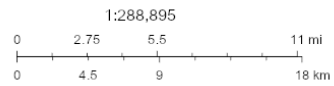
According to the 2021 TCAC/HCD opportunity area map, one census tract in the region is considered “high segregation and poverty” areas (Table D-13). This census tract is located in El Centro. TCAC maps categorize the level of resources in each census tract. Categorization is based on percentile rankings for census tracts within the region. Regionally, low resource areas (green) are concentrated in the southern tracts of County, along the US-Mexico border as well as some census tracts in El Centro. The middle tracts of the County, surrounding Imperial and Brawley have high resources. Census tracts between Calexico and El Centro have moderate resources.

Table D-13: TCAC Composite Scores- Region



8/5/2021, 6:11:41 PM

- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data



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Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of

Local Trends

According to the HCD/TCAC opportunity map (Figure D-17), El Centro is made up of census tracts with varying degrees of resources. Northeastern census tracts shared with Imperial scored higher, as well its western tracts. Tracts along its southern boundary tended to be moderate resource. However, most tracts in the center of the City scored as low resource, and an adjacent tract was identified as an area of high poverty and segregation.

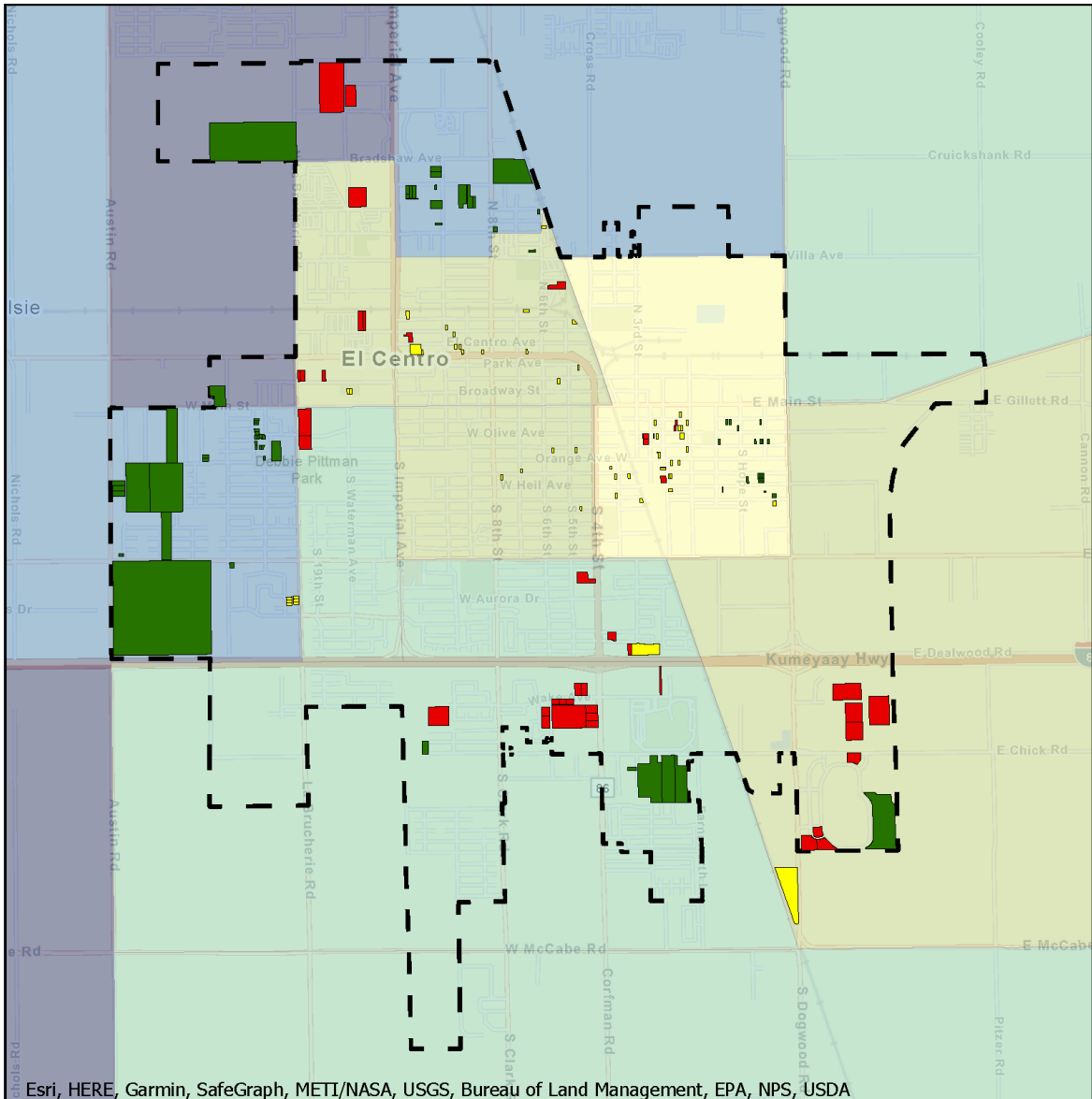
Distribution of RHNA Units by TCAC Opportunity Area

Table D-14 shows the distribution of RHNA sites across the TCAC opportunity areas. About 35 percent of all RHNA units are located in high or highest resource areas and another 27 percent are located in areas with moderate resources. Of the 1,903 lower income RHNA units, over 52 percent are in the moderate and high/highest resource tracts. About 46 percent are located in areas with low resources. These lower income units are scattered geographically across the city in its central tracts as well as its southeastern areas. While close to 50 percent of the lower income units are in lower resource tracts, the City has sited about 74 percent of moderate units in these tracts as well. In addition, 14 percent of moderate income units are located in the tract considered an area of high segregation and poverty to improve conditions in the area.

Table D-14: RHNA Unit Distribution by TCAC Opportunity Area

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
High/Highest Resource	14.7%	2.7%	69.2%	34.6%
Moderate Resource	37.1%	9.4%	18.2%	26.6%
Low Resource	46.3%	73.5%	11.3%	35.8%
High Segregation & Poverty	1.9%	14.4%	1.2%	3.0%
Total Units	1,903	437	1,498	3,838

Figure D-18: TCAC Opportunity Areas- City of El Centro





City of El Centro Housing Element Sites Inventory with TCAC Opportunity Areas 2021

TCAC Opportunity Areas 2021 - Composite Score (Tract) Sites Inventory


- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

- Income Level**
- Lower
 - Moderate
 - Above Moderate Income
 - City Boundary

N

0 0.5 1



Miles

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affh-data-resources-cahd.hud.orgis.com>

Opportunity Indices

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Santee residents' access to key opportunity assets in comparison to the County. Table C- provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. *The higher the score, the higher the labor force participation and human capital in a neighborhood.*
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). *The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.*

Table C-14: Opportunity Indices by Race/Ethnicity- Imperial County and City of El Centro

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Imperial County							
Total Population							
White, Non-Hispanic	39.39	36.51	20.32	29.59	14.36	51.81	23.63
Black, Non-Hispanic	29.18	46.34	6.43	38.15	11.38	25.11	37.59
Hispanic	29.31	26.34	15.53	28.73	16.38	43.76	15.53
Asian or Pacific Islander, Non-Hispanic	45.75	34.32	26.53	29.13	14.35	46.96	15.99
Native American, Non-Hispanic	14.21	8.80	4.98	27.81	14.62	66.99	34.27
Population below federal poverty line							
White, Non-Hispanic	21.58	30.16	10.57	34.37	16.99	48.38	27.88
Black, Non-Hispanic	16.96	22.55	10.99	37.05	22.86	63.60	13.45
Hispanic	21.83	24.36	11.82	31.69	18.38	44.00	14.08
Asian or Pacific Islander, Non-Hispanic	16.01	17.46	10.41	38.95	27.22	60.26	10.87
Native American, Non-Hispanic	12.61	6.53	6.05	24.79	14.87	64.86	31.77
City of El Centro							
Total Population							
White, Non-Hispanic	43.93	31.91	31.89	37.14	20.94	62.43	9.62
Black, Non-Hispanic	21.30	21.27	17.52	37.18	24.37	70.52	9.38
Hispanic	28.29	25.89	21.01	39.90	24.12	67.81	9.40
Asian or Pacific Islander, Non-Hispanic	54.51	40.77	38.87	38.76	18.88	60.17	9.29
Native American, Non-Hispanic	23.65	22.13	18.24	43.53	26.92	66.03	9.57
Population below federal poverty line							
White, Non-Hispanic	17.89	13.18	23.61	46.02	28.26	66.66	9.34
Black, Non-Hispanic	12.27	12.09	16.53	37.24	26.82	72.54	9.25
Hispanic	17.00	13.65	20.76	41.01	26.45	70.66	9.36
Asian or Pacific Islander, Non-Hispanic	8.56	7.67	16.48	45.02	32.74	70.87	9.16
Native American, Non-Hispanic	16.74	16.47	17.55	32.10	22.89	71.54	9.40

Note: American Community Survey Data are based on a sample and are subject to sampling variability. See page 45 for index score meanings. Table is comparing the total Imperial County and El Centro population, by race/ethnicity, to the County and City population living below the federal poverty line, also by race/ethnicity.

Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Education

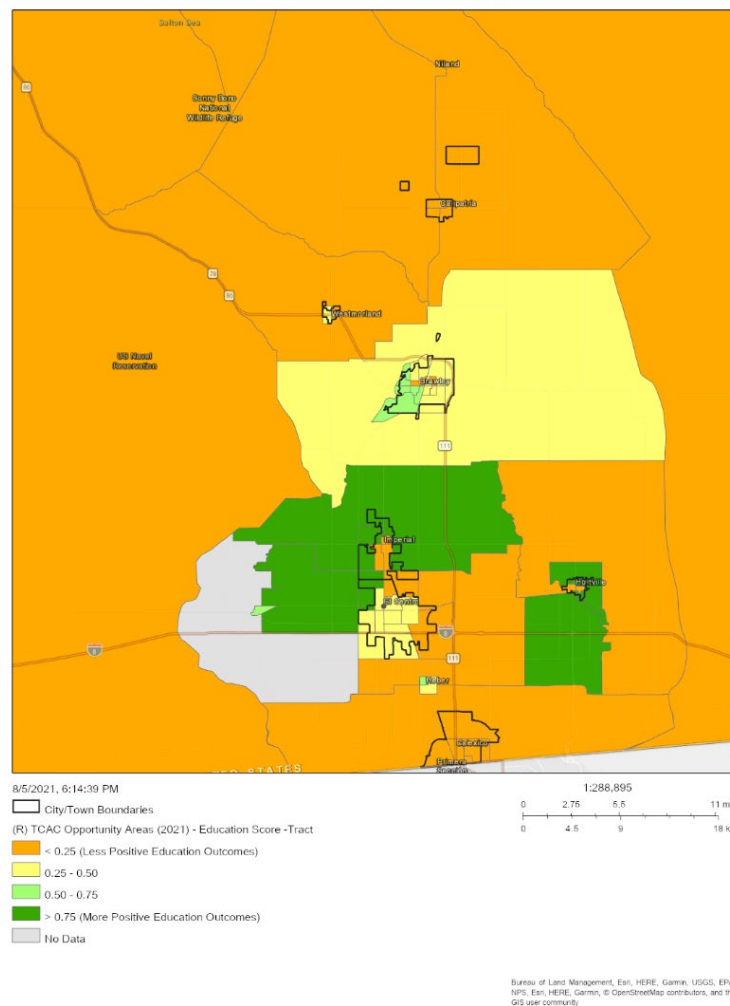
Regional Trends

School proficiency scores are indicators of school system quality, with higher scores indicating higher school quality. In Imperial County, White, Black, and Asian residents have access to better schools (scores 46 to 34, with Black residents scoring highest) compared to Hispanic and Native American residents (scored 26 and nine, respectively). Native American residents had the lowest school proficiency index, almost five times lower than blacks and four times lower than White and Asian residents. For residents living below the federal poverty line, index scores decreased for all races, but decreased the least for Hispanic (two points), Native American (two points), and White (six points) residents. Indices for Black and Asian residents living in poverty decreased by over 17 points.

The HCD/TCAC education scores for the region show the distribution of education quality based on education outcomes (

Figure D-19). Lower education scores are found in Brawley and surrounding areas as well as El Centro and Herber. Higher education scores are prominent in the edges of and surrounding areas of the cities of Imperial and Holtville.

Figure D-19: TCAC Education Scores- Region



Local Trends

In the City of El Centro, school proficiency indices ranged from 21 to 41 and were lowest for Black, Native American and Hispanic residents, whose proficiency indices were lower than 26. Compared to the County, school proficiency scores were higher for El Centro residents, except for Black and Hispanic residents. Similar to the County, residents living below the poverty line had lower index scores than the entire ethnic/racial groups, but scores decreased dramatically for most races (more than nine points) but most notably for Asian residents, whose school proficiency index decreased by 33 points.

Greatschools.org is a non-profit organization that rates schools across the United States. The Great Schools Summary Rating calculation is based on four ratings: Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average”, 5-6 indicate “average”, and 7-10 are “above average.” Figure D-20 shows that most of El Centro’s pre-K, elementary, middle, and high schools scored in the average range. Only one school (Sunflower Elementary) in the western side of the city scored as above average. Below average scores are scattered across the City in the north, east, and center of the City. These average scores correspond with the TCAC’s Education Score map for the City on Figure D- 21. Most of the city’s census tracts had median education scores (0.25 to 0.75 out of one), with only portions of its northwestern areas scoring high (meaning more positive outcomes).

Figure D-20: GreatSchools Ratings

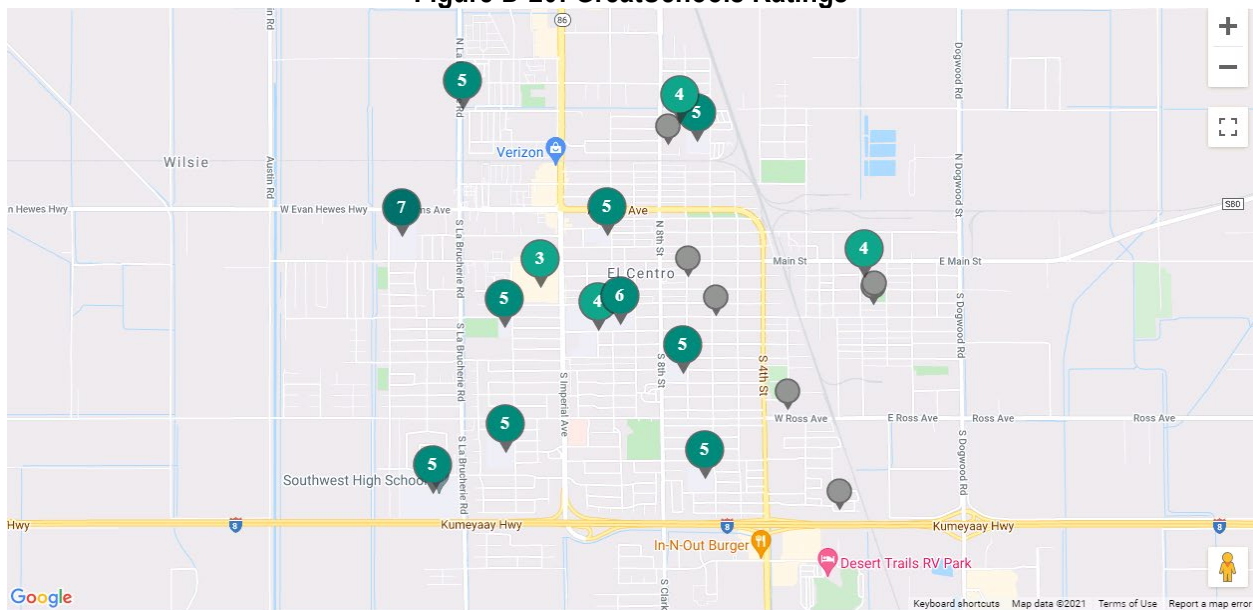
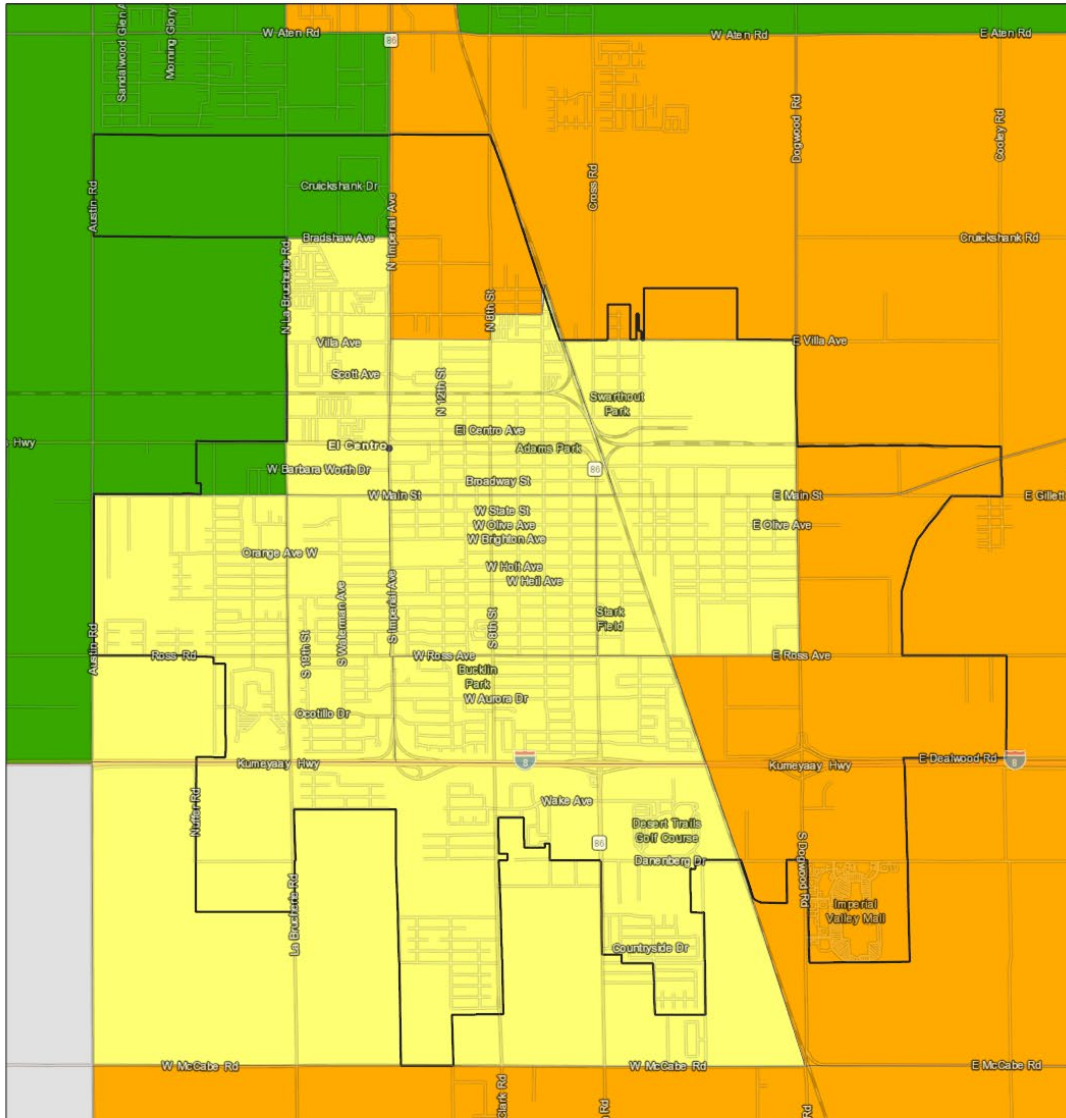


Figure D- 21: TCAC Education Score- City of El Centro



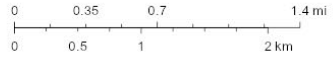
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- > 0.75 (More Positive Education Outcomes)
- No Data

1:36,112



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Transportation

Regional Trends

HUD's opportunity indicators have two categories to describe transportation- transit index and low transportation cost. In the County, transit index scores ranged from 28 to 38, with White, Hispanic, Asian, and Native American residents scoring similarly and Black resident scoring highest. For residents living below the poverty line, the scores had a similar but lower range from 25 for Native American residents to 37 for Black residents. Regardless of income, White residents had higher scores.

Low transportation cost scores had a small range from 11 to 16 across all races and were slightly higher for residents living below the poverty line (range 15 to 27). The total Hispanic population had the highest low transportation costs but Hispanics living in poverty had the among the lowest. Considering that a higher transit index score indicates a higher likelihood to use public transit and a higher "low transportation cost" indicates a lower cost of transportation, residents living in poverty are more likely to use public transit.

Local Trends

Transit index scores within the City of El Centro were higher than the County's, ranging from 37 to 44, with Native American and Hispanic residents scoring highest and Whites and Blacks scoring lowest. For residents living below the poverty line, scores were higher for most races, but lower for Native American residents) indicating lower likelihood to use public transit. For low transportation cost indices, scores in the City of El Centro were higher than the County (ranging from 19 to 27) and were in the higher range for residents living below the federal poverty line (23 to 33). Among the races, White and Asian residents scored lowest for the population but highest when living in poverty.

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), El Centro has the very low AllTransit Performance Score of 0.4 (out of 10). The map in Figure D-22 that the areas of connectivity, job accessibility, and frequency of service are concentrated in about five spots in the City, mostly in the center. These same areas are the ones that have access to transit stops within a ½ mile (Figure D-23).

Figure D-22: AllTransit Score- City of El Centro

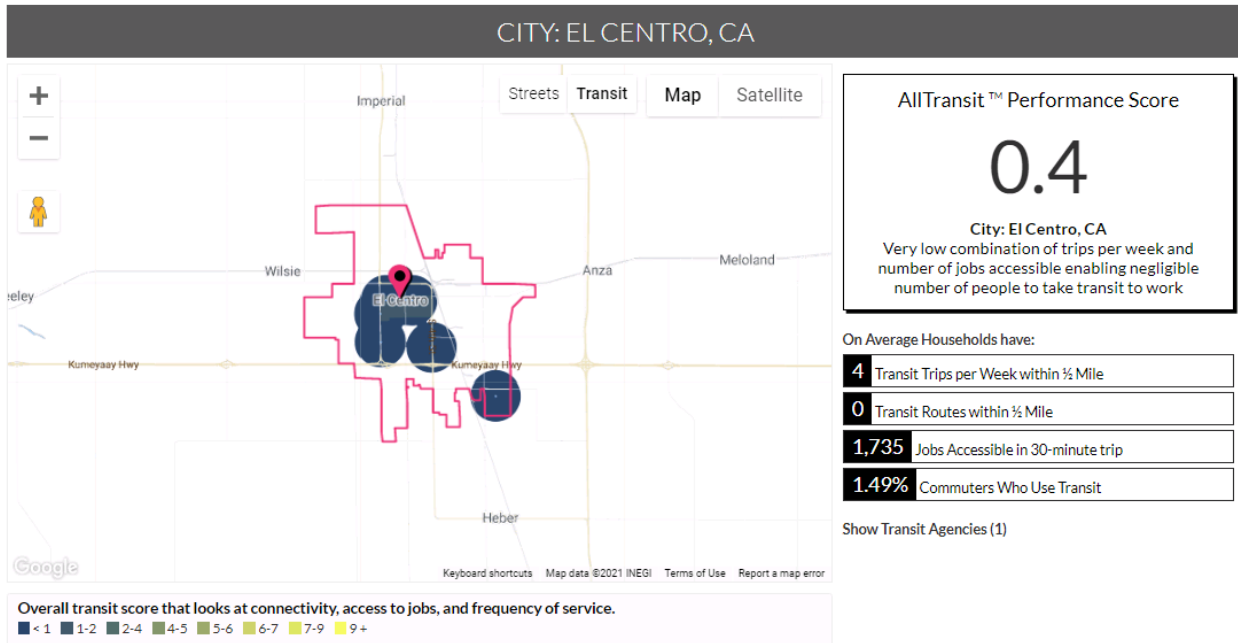
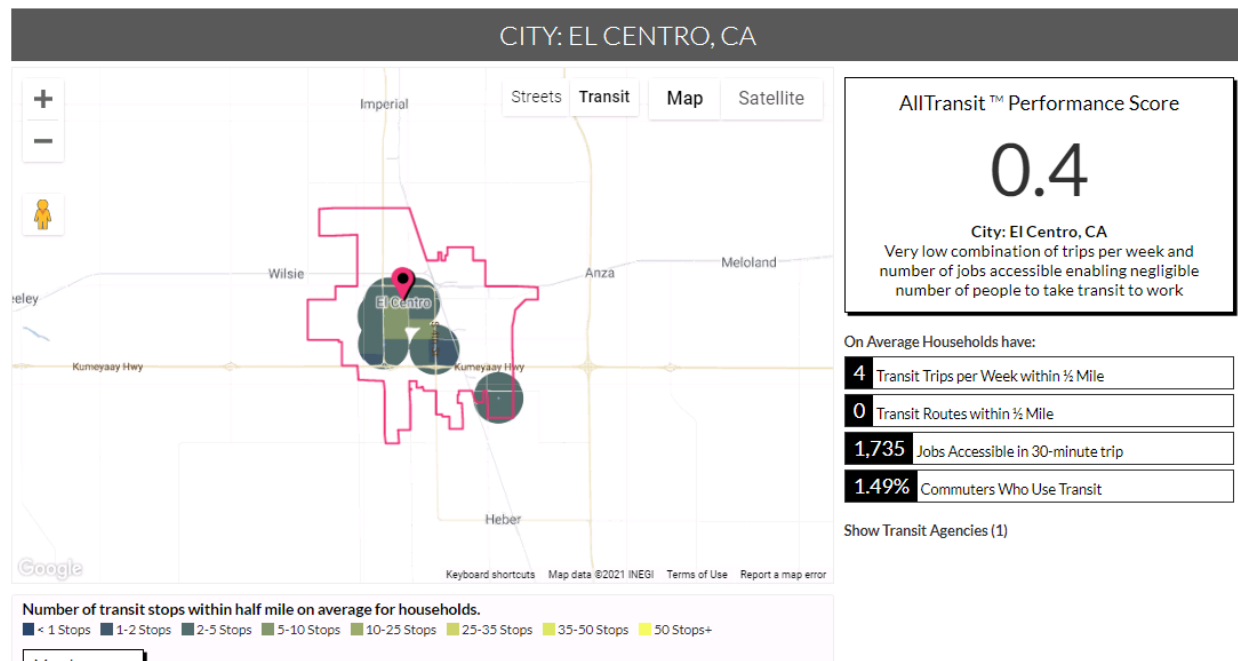


Figure D-23: Transit Stops within ½ Mile – City of El Centro



Economic Development

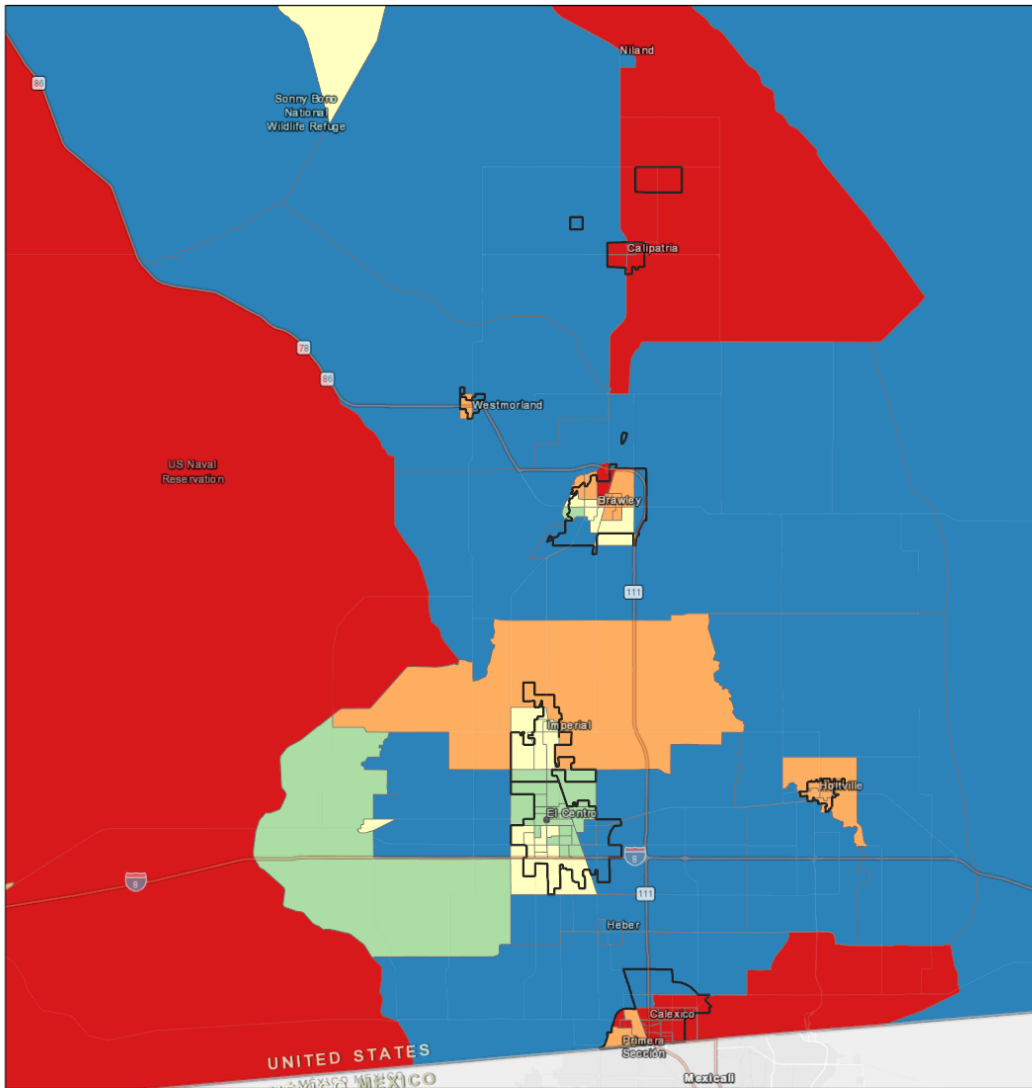
Regional Trends

HUD's opportunity indicators provide scores for labor market and jobs proximity. The labor market score is based the level of employment, labor force participation, and educational attainment in a census tract. Imperial County's labor market scores ranged from five to 27, with Native American residents scoring lowest and Asian residents scoring highest. Considering the majority of the County is Hispanic, Hispanic scored in the midrange of labor market indices (16). Scores for Imperial County residents living below the poverty line dropped notably most races, but increased for Blacks and Native Americans.

HUD's jobs proximity score quantifies the accessibility of a neighborhood to jobs in the region. County jobs proximity indices ranged from 25 for Blacks to 67 for Native Americans. The jobs proximity map in Figure D-24 shows the distribution of scores in Imperial County region. The highest scores are located in the north and eastern areas of the county (where farmland and farming activities occur). The lowest scores are concentrated in the west, northeast, and southern areas of the County (in Calexico and eastern block groups). Major cities like Imperial, El Centro, and Brawley have a variety of job proximity index scores in the mid-range and upper range.

The TCAC Economic Scores are a composite of jobs proximity as well as poverty, adult education, employment, and median home value characteristics. The map in Figure D-25 show that the highest economic scores are in areas surrounding major cities like Brawley, Imperial, and El Centro (in the center of the County, in tracts adjacent to California Hwy 111. The lowest economic scores are found along the US-Mexico border and the exterior tracts of the County.

Figure D-24: Jobs Proximity Index- Region



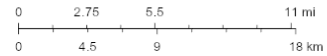
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City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)

1:288,895

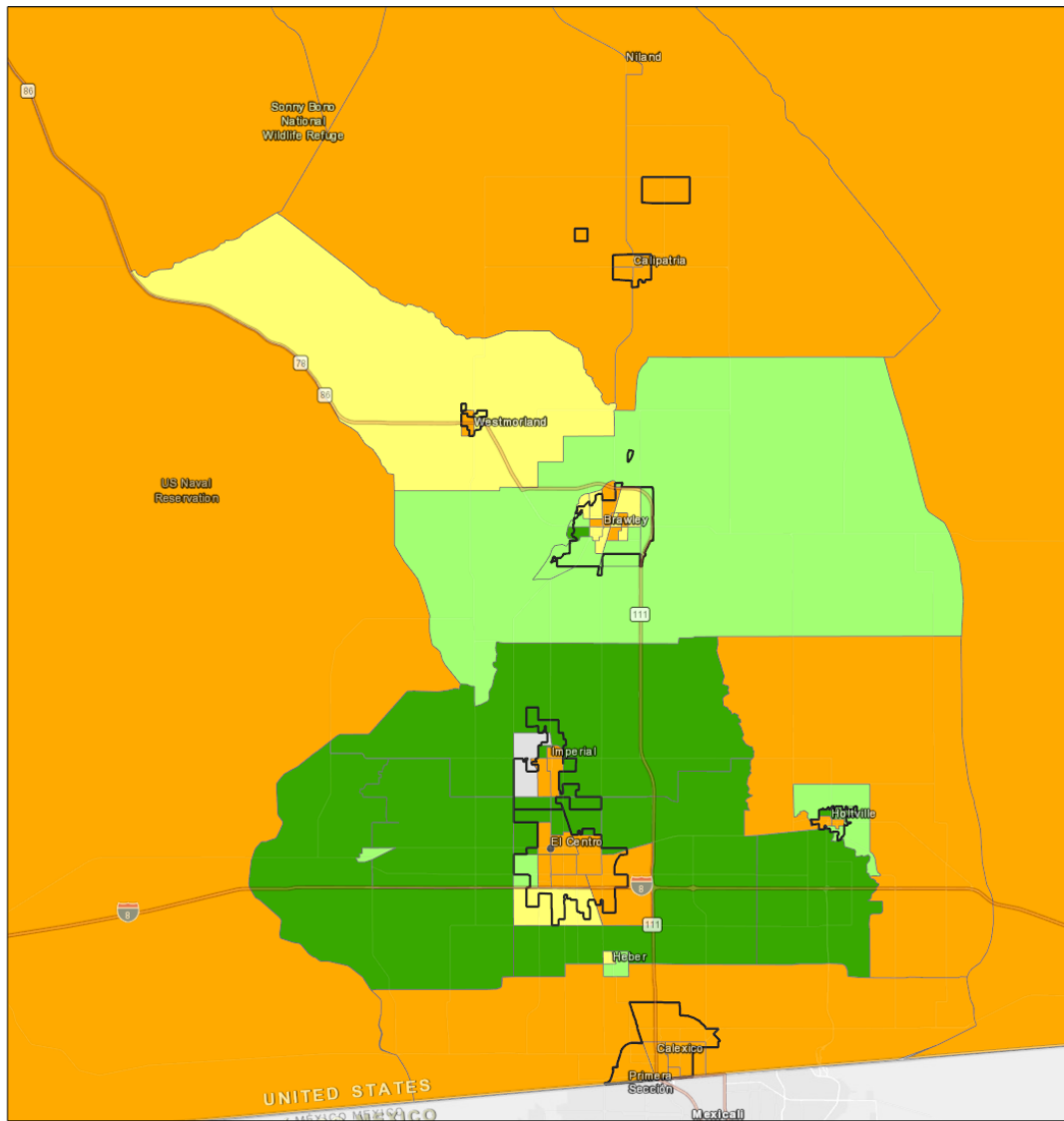


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Figure D-25: TCAC Economic Score- Region



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

< 0.25 (Less Positive Economic Outcome)

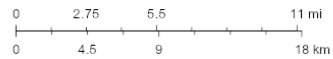
0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Economic Outcome)

No Data

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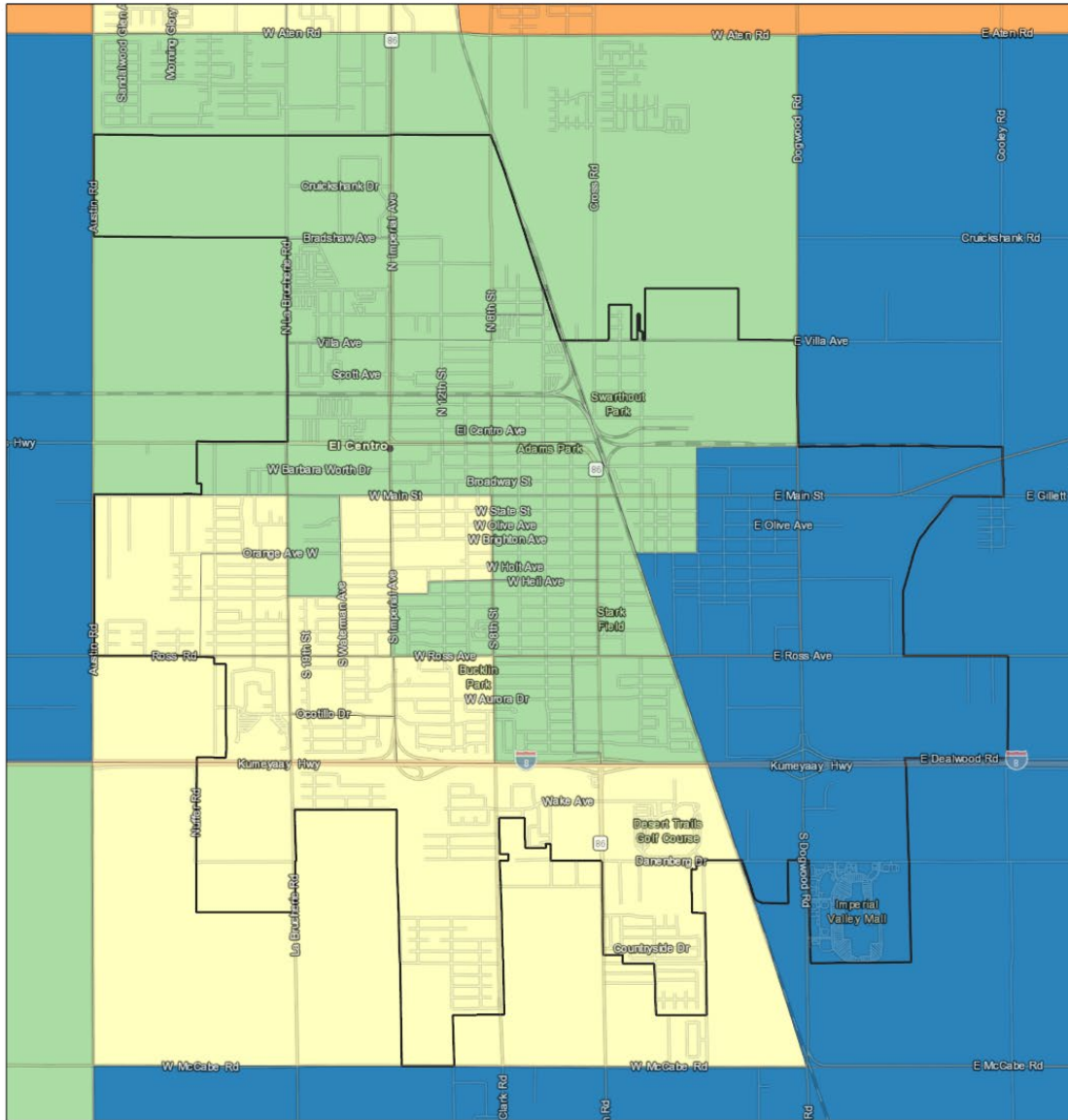
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Local Trends

El Centro had slightly higher labor market index scores (ranging from 18 to 39) than the County overall (five to 27), indicating a higher labor force participation and human capital. However, within the City, Asian and White residents scored the highest and Blacks and Native Americans scored the lowest. HUD's jobs proximity score quantifies the accessibility of a neighborhood to jobs in the region. El Centro scored higher (60 to 71) than the County overall (25 to 67). Jobs proximity scores for residents living below the federal poverty line were slightly higher than the population at large with scores ranging from 67 to 73. The map in Figure D- 26 shows the distribution of job indices within the City. The southwestern census tracts scored the lowest, northern tracts scored in the mid-range, and eastern census tracts scored highest. Blue tracts in Figure D- 26 are located in the southeast and along E. Main Street and have the highest job proximity index. These tracts contain the mall and many other retail/hotels. The southwest part of the city is made up of subdivisions and there are no employment areas (besides the high school and some restaurants going towards 4th Street along Wake ave). The northern tracts all have the Adams/4th Street Corridor and Imperial Ave corridor which has a majority of the retail/office uses along with all the big box stores.

The TCAC Economic score map in Figure D- 27, incorporate jobs proximity as well as poverty, adult education, employment, and median home value characteristics of the area. Once other economic characteristics are incorporated, the map shows that most of the City, south has among the lowest economic scores (less than 0.5 out of 1). This reversal in trends shows that while residents in the eastside are close to jobs, their economic outcomes are less positive (higher poverty, lower education and home values).

Figure D- 26: Jobs Proximity Index – City of El Centro



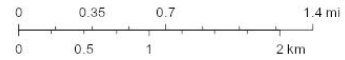
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City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)

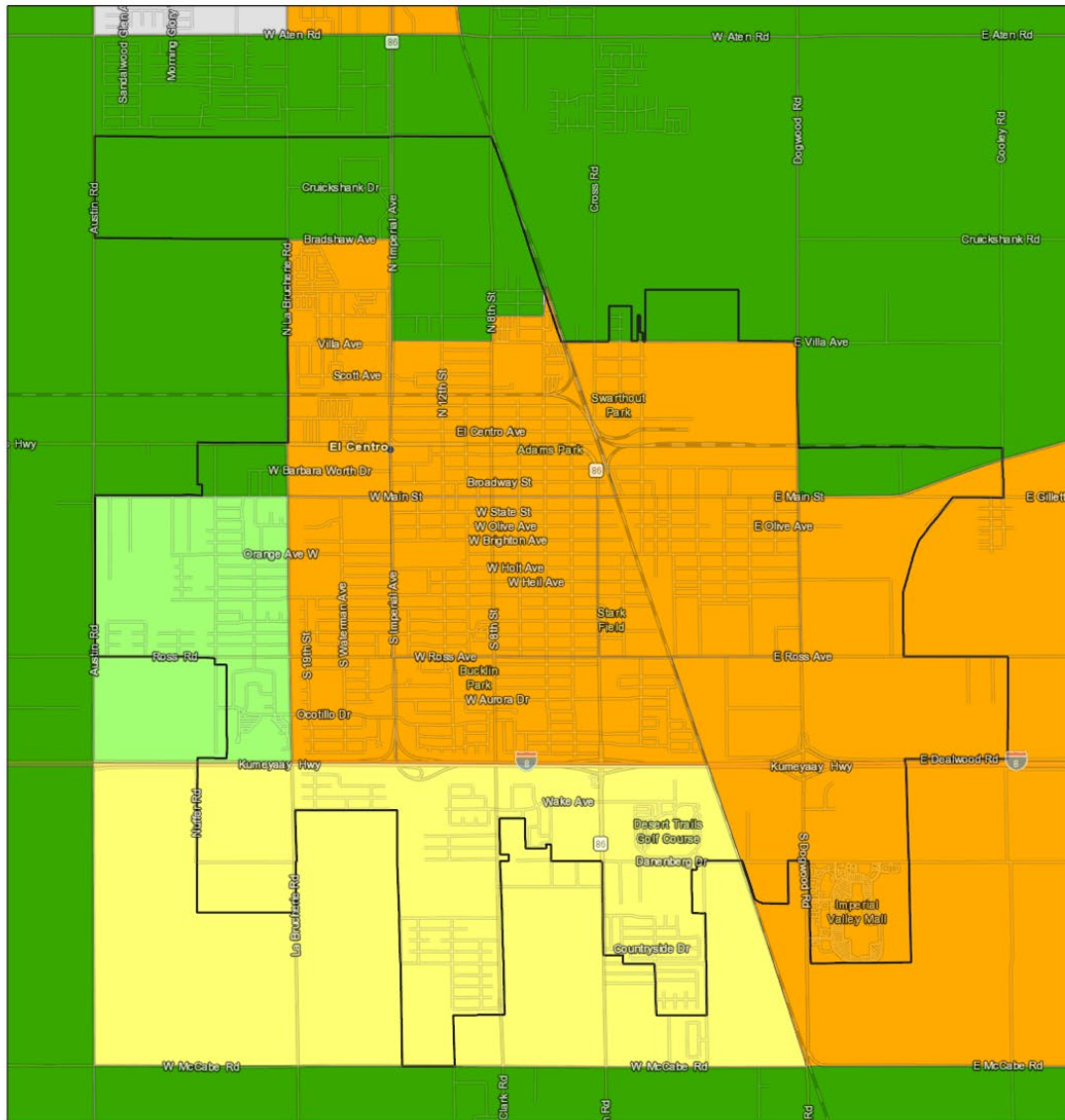
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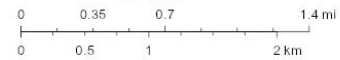
Figure D- 27: TCAC Economic Score- City of El Centro



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City/Town Boundaries



(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

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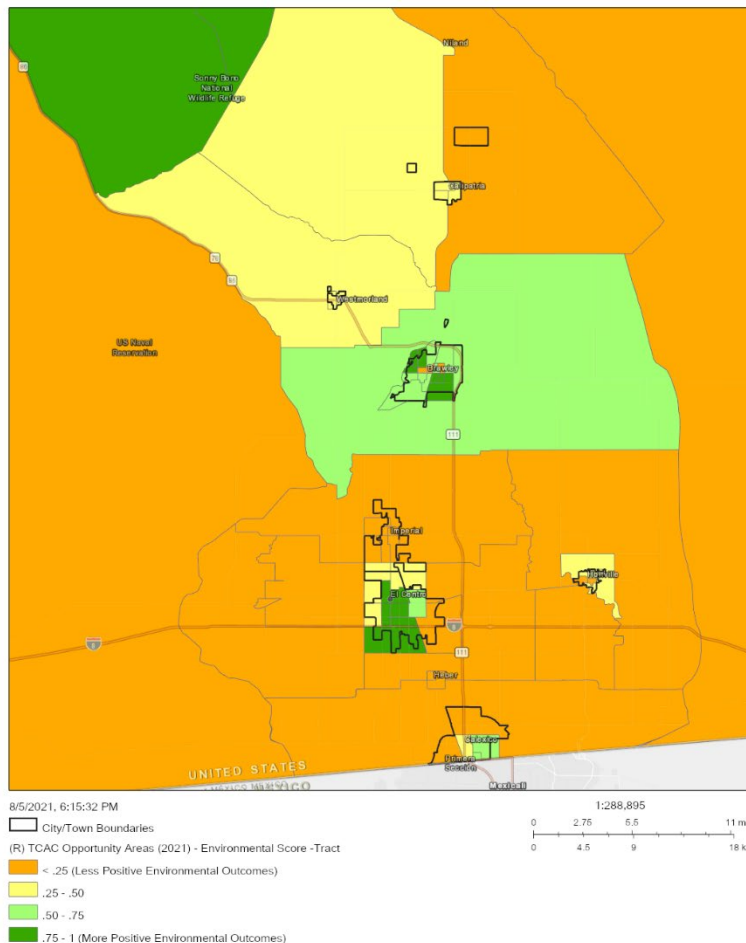
Environment

The TCAC Environmental Score is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment.

Regional Trends

The TCAC Environmental scores were lowest in areas outside of major jurisdictions, with the least positive environmental outcomes throughout the eastern, western, and southern tracts of the County (Figure D-28). Tracts in the cities of El Centro, Calexico, and Brawley scored highest for positive environmental outcomes.

Figure D-28: TCAC Environmental Score- Region



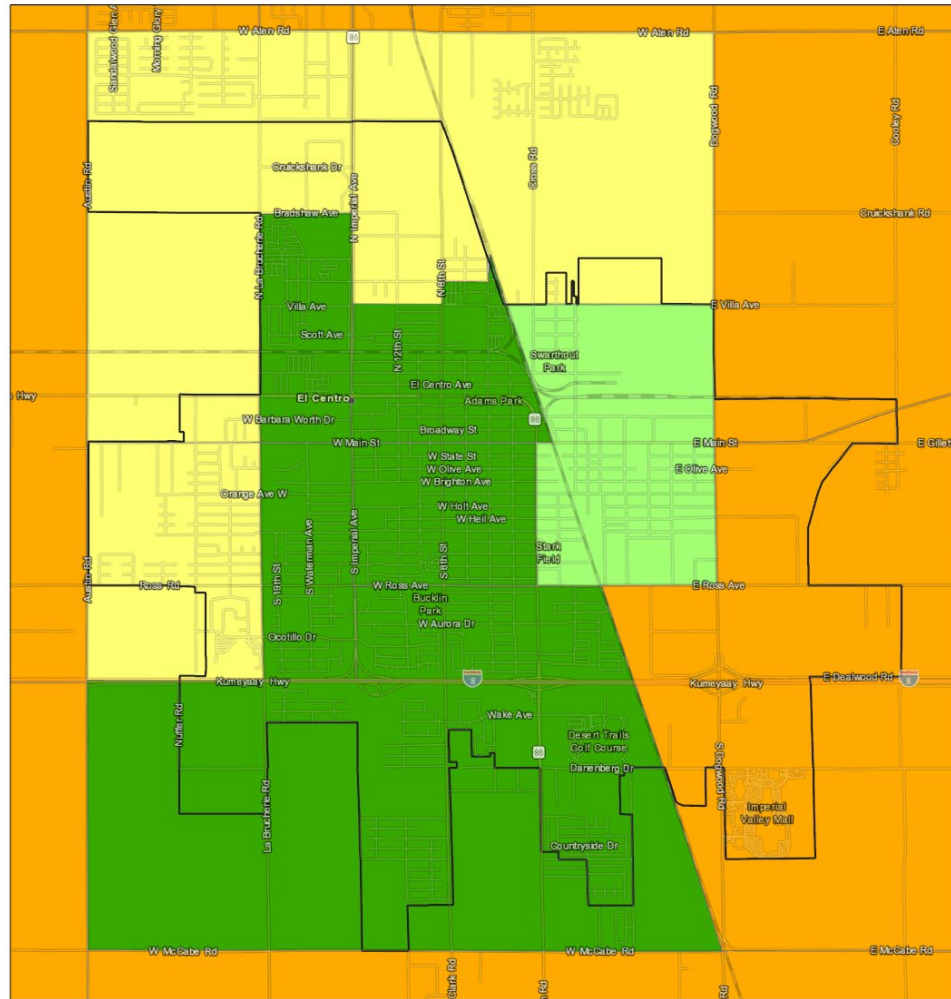
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Local Trends

As shown in Figure D-29, most of the City's census tracts have the highest/most positive environmental outcomes. These census tracts are located west of the railroad tracks. Scores are lower in census tracts along the City boundaries in the northwestern, north, and eastern sides of the City.

Figure D-29: TCAC Environmental Score- City of El Centro



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

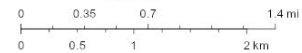
< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

.75 - 1 (More Positive Environmental Outcomes)

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E. Disproportionate Needs

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, overcrowding, and substandard housing.

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

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and
- Units with physical defects (lacking complete kitchen or bathroom)

According to CHAS data based on the 2013-2017 ACS, Imperial County and the City of El Centro households experience housing problems at similar rates (36 percent of households and 38 percent, respectively). In both the County and City, renters are more likely to be affected by housing problems than owners.

Cost Burden

Regional Trends

In Imperial County, approximately 36 percent of households were experiencing cost burdens according to the 2013-2017 CHAS data (Table D- 15). Renters experience cost burdens at higher rates than owners (49 percent compared to 27 percent), regardless of race. Among renters, Hispanic households experience the highest rates of cost burdens (50 percent and 58 percent). Cost burdened renter households are concentrated census tracts in Calexico, El Centro, Imperial, and Brawley (Figure D-30).

Table D- 15: Housing Problems and Cost Burden - Imperial County

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	19.1%	33.0%	34.1%	9.4%	100.0%	36.9%	2.6%	32.1%
Renter-Occupied	46.6%	50.3%	17.9%	28.1%	0.0%	59.2%	44.8%	56.8%
All Households	25.7%	43.2%	27.5%	16.6%	71.4%	47.5%	23.0%	42.8%
With Cost Burden								
Owner-Occupied	17.8%	33.3%	34.1%	7.5%	100.0%	29.9%	2.6%	26.8%
Renter-Occupied	44.8%	46.3%	10.4%	18.8%	0.0%	50.0%	44.8%	48.6%
All Households	24.3%	41.0%	24.5%	11.8%	71.4%	39.5%	23.0%	36.3%

Source: HUD CHAS, (2013-2017).

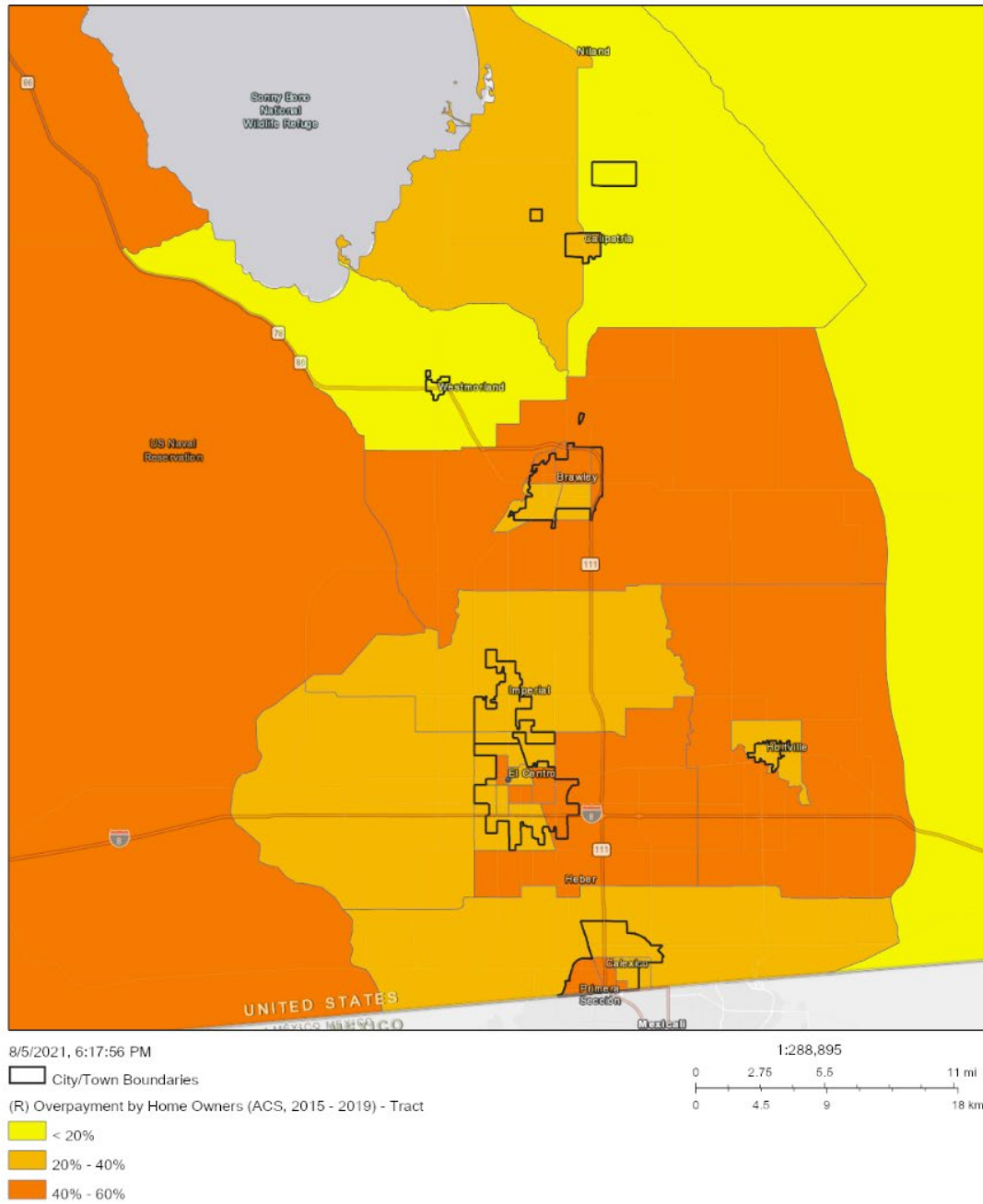
Table D- 16: Housing Problems, Elderly and Large Households, Imperial County

	Owner-Occupied			Renter-Occupied			All HH
	Elderly	Large HH	All Owner	Elderly	Large HH	All Renters	
Any Housing Problem	29.9%	42.7%	32.2%	56.1%	71.2%	56.8%	42.9%
Cost Burden > 30%	28.4%	21.7%	26.8%	53.5%	44.7%	48.5%	36.2%

Source: HUD CHAS, (2013-2017).

Figure D-30: Cost Burdened Renters and Owners (2019) – Region

Cost Burdened Owners (2019)- Region

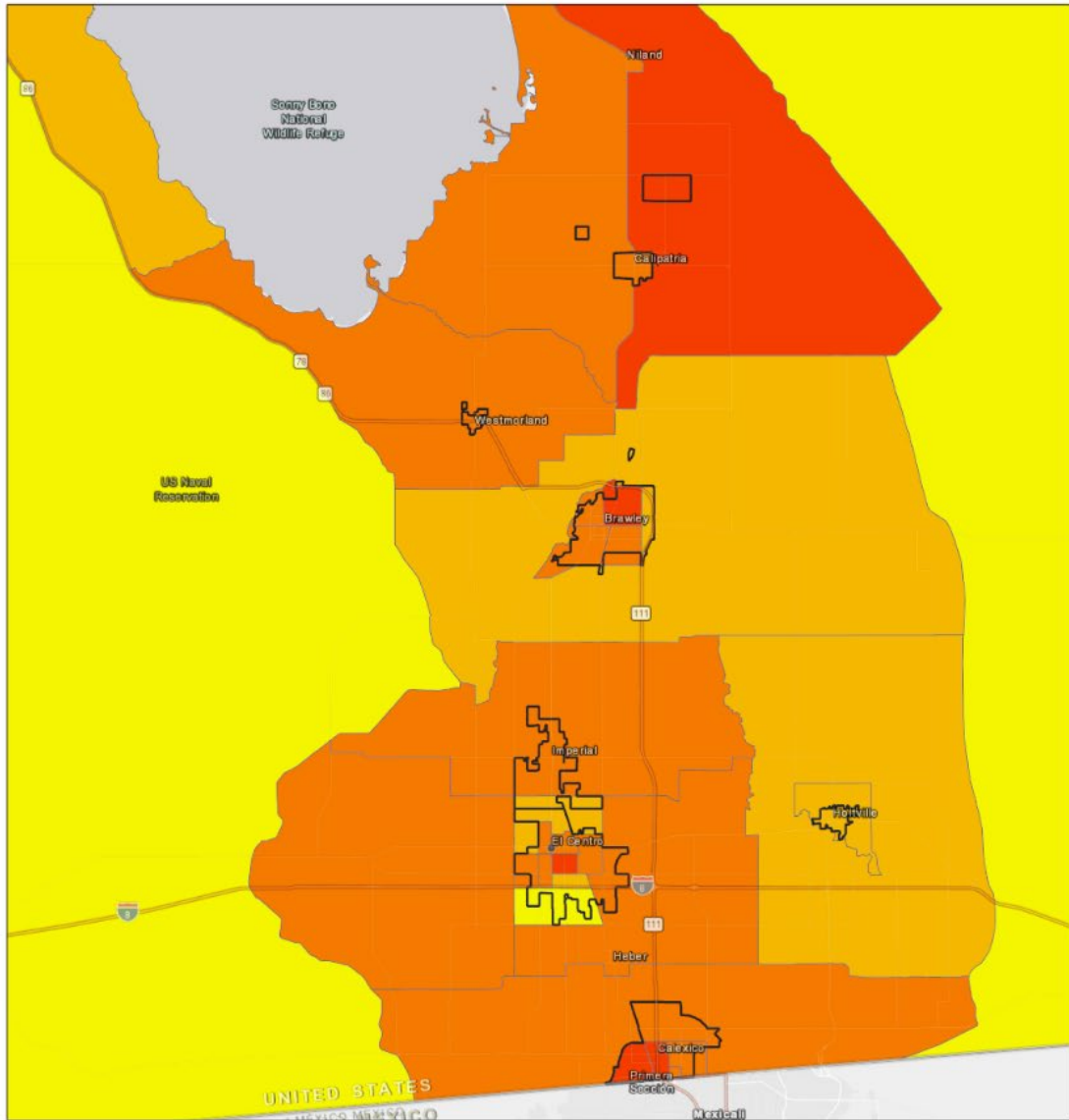


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CA HCD

Cost Burdened Renters (2019)- Region



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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

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CA HCD

Local Trends

El Centro households experience cost burdens at similar rates than the County (38 percent in El Centro, 36 percent in the County). Like the County, renters also experience cost burdens at higher rates than owner households (49 percent and 26 percent, respectively) and Black and Hispanic households are affected by cost burdens at the highest rates. While renters in both the County and City experience higher cost burden at higher rates than owners, Black households experience the highest rates of cost burdens (66 percent for renters, 53 for owners) among all races, tenures, and all households in the City.

Figure D-31 shows the concentration of cost burdened renters and owners in 2019. Cost burdened owner households are concentrated in the north and southeastern quadrants of the City. In these census tracts, between 40 and 60 percent of owner households are cost burdened. Cost burdened renter households are more widespread throughout the City and more heavily concentrated. In most tracts north of Interstate 8, at least 40 percent of renter households experience cost burdens. One tract in the center of the City has the highest concentration of cost-burdened renters, with over 60 percent of households experience cost burdens.

Table D-17: Housing Problems and Cost Burden- City of El Centro

	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	17.5%	53.3%	6.2%	0.0%	0.0%	36.6%	0.0%	32.1%
Renter-Occupied	45.6%	63.2%	15.6%	42.9%	0.0%	59.9%	0.0%	57.4%
All Households	25.4%	59.4%	12.9%	42.9%	0.0%	49.1%	0.0%	44.9%
With Cost Burden								
Owner-Occupied	15.7%	53.3%	6.2%	0.0%	0.0%	29.0%	0.0%	26.1%
Renter-Occupied	40.8%	65.8%	5.0%	42.9%	0.0%	51.1%	0.0%	49.4%
All Households	22.7%	61.0%	5.3%	42.9%	0.0%	40.9%	0.0%	37.9%

Source: HUD CHAS, (2013-2017).

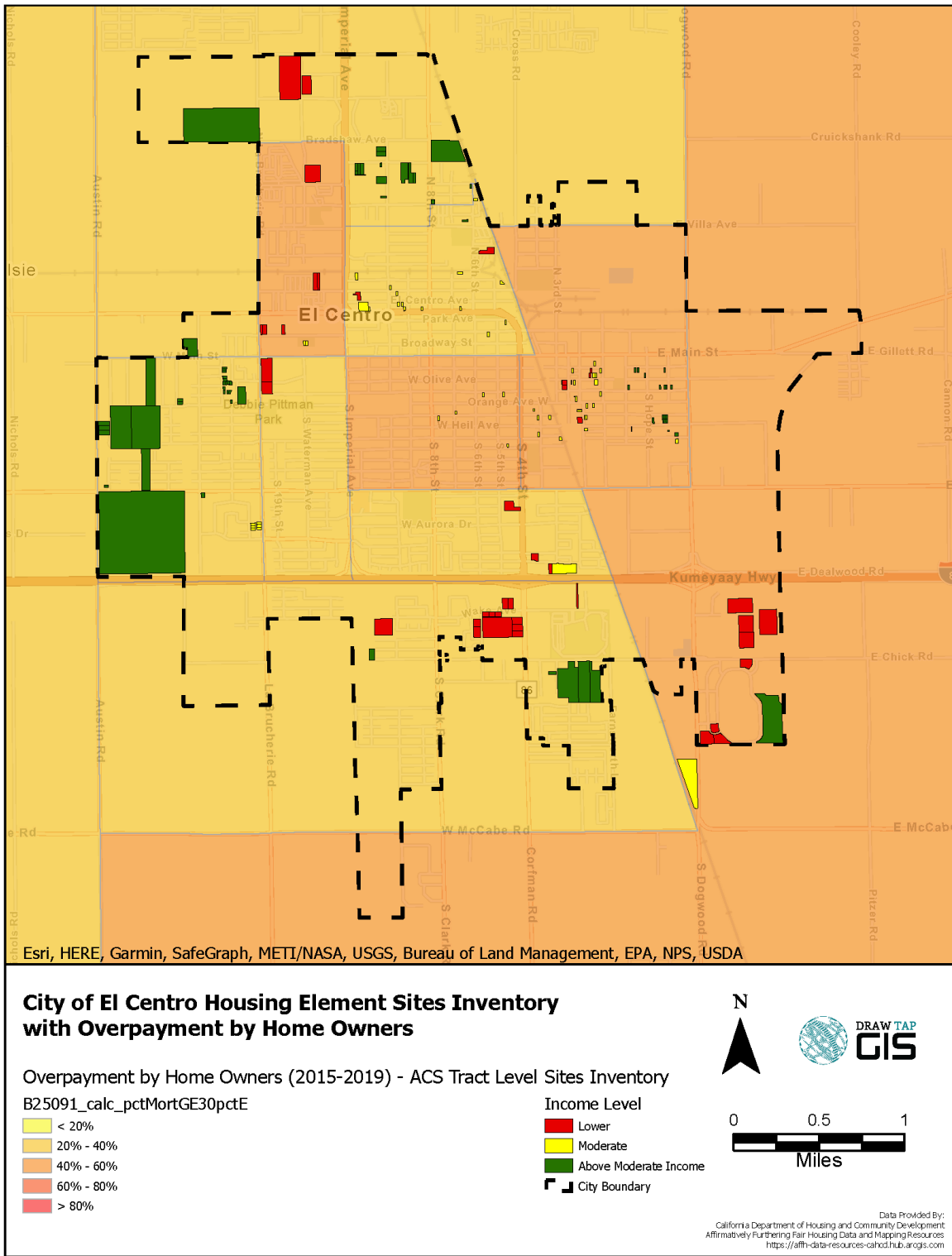
Like in the County, renter elderly and large households are disproportionately affected by housing problems and cost burdens (Table D-18). While 57 percent of renter households in the City experience problems, 60 percent of elderly households and 68 percent of large renter households experience housing problems. Large owner and renter households appear to be experiencing overcrowding or substandard housing conditions given that while 41 and 68 percent of households experience housing problems (respectively), less than that percentage experience cost burdens (the gap percentage represents households experiencing overcrowding or substandard conditions).

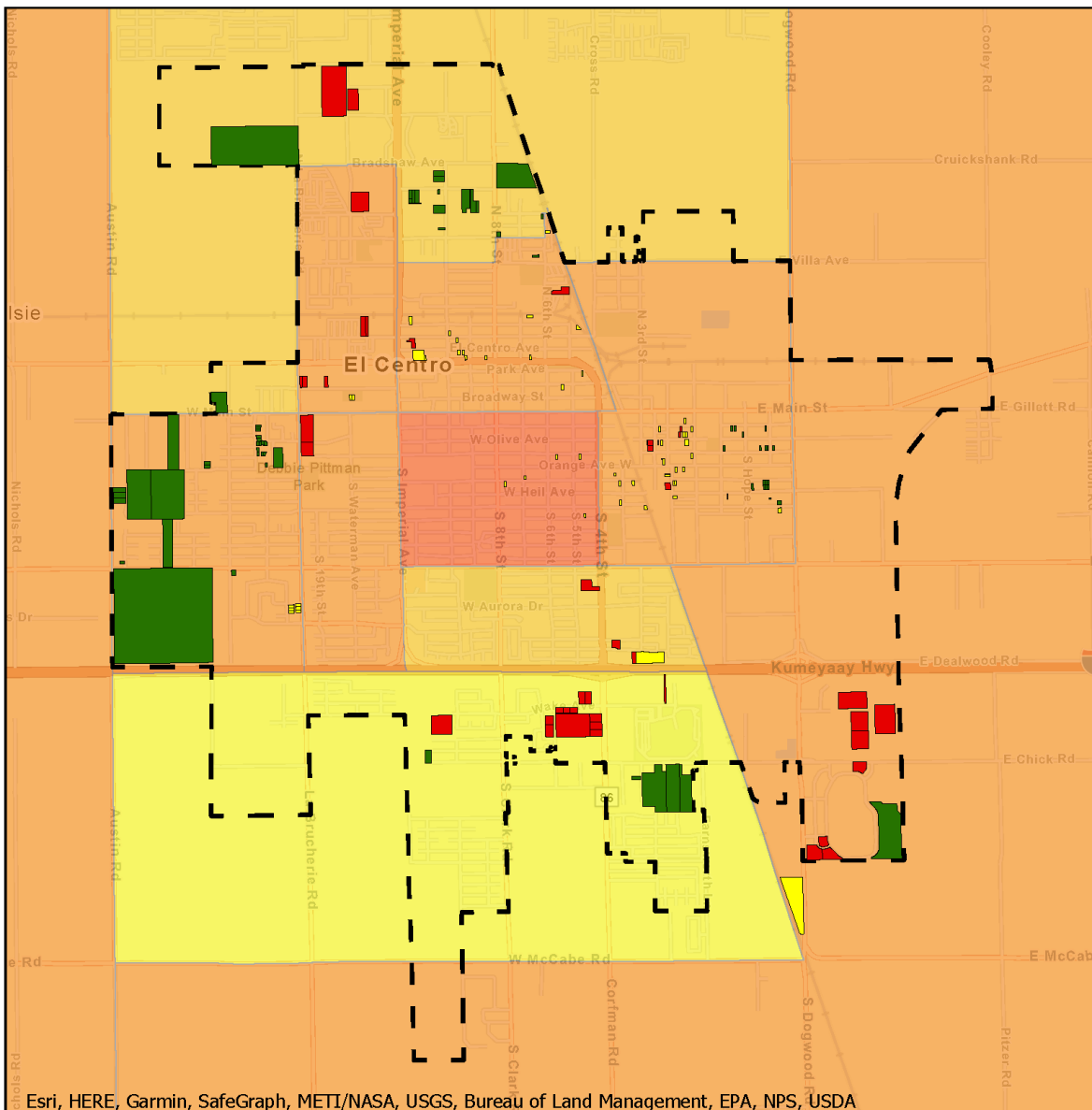
Table D-18: Housing Problems, Elderly and Large Households, City of El Centro

	Owner-Occupied			Renter-Occupied			All HH
	Elderly	Large HH	All Owner	Elderly	Large HH	All Renters	
Any Housing Problem	26.1%	41.2%	32.1%	60.3%	68.4%	57.3%	44.8%
Cost Burden > 30%	23.1%	21.1%	26.1%	56.5%	39.6%	49.3%	37.8%

Source: HUD CHAS, (2013-2017).

Figure D-31: Cost Burdened Owners and Renters (2019) - City of El Centro





Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

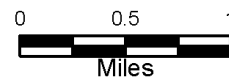
City of El Centro Housing Element Sites Inventory with Cost Burden 2019 - Renters

Overpayment by Renters (2015-2019) - ACS Tract Level Sites Inventory

B25070_calc_pctGE30pctE

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

- Lower
- Moderate
- Above Moderate Income
- City Boundary



Data Provided By:
 California Department of Housing and Community Development
 Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affh-data-resources.ca/hcd.hub.arcgis.com>

Distribution of RHNA Units by Cost Burdened Households

The City is mostly made up of census tracts with 20 to 40 percent and 40 to 60 percent cost burdened owner households. Because of this, all RHNA units are distributed in census tracts with this percentage of cost burdened owner households. Table D- 19 shows that 63.5 percent of all RHNA units are located in tracts with the lower concentration of cost burdened owners (20 to 40 percent) while 36.5 percent of all units are located in tracts with higher cost burdened concentrations. Lower income RHNA units follow similar distributions. The majority of moderate income units (71 percent) are located in tracts with higher concentrations of cost burdened owner households, while most of the above moderate units (88 percent) are located in tracts with lower concentrations of cost burdened homeowners.

Cost burdened renter households are more prevalent throughout the City’s census tracts and a higher percentage of renter households are cost burdened per tract (e.g. some tracts have between 60 and 80 percent cost-burdened renter households). Table D-20 shows that most RHNA units are distributed among tracts with cost-burdened renter households ranging from less than 20 percent to up to 60 percent. Only 11 units (less than one percent all RHNA units) are sited in the census tract with the highest proportion of cost burdened renter households, and they are all moderate income units. Also, 57 percent of lower income RHNA units are located in census tracts with a higher concentration of cost-burdened renter households (40 to 60 percent). Siting lower income (affordable) housing in cost burdened areas could alleviate the cost burdened of existing residents while at the same time lower income units in areas with lower cost burdens can promote mobility.

Table D- 19: RHNA Unit Distribution by Cost-Burdened Homeowner Households

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20 %	0.0%	0.0%	0.0%	0.0%
20% - 40%	52.5%	29.3%	87.5%	63.5%
40% - 60%	47.5%	70.7%	12.5%	36.5%
60% - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,903	437	1,498	3,838

Table D-20: RHNA Unit Distribution by Cost-Burdened Owner Households

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20 %	25.5%	0.0%	18.2%	19.8%
20% - 40%	17.6%	9.4%	19.9%	17.5%
40% - 60%	56.9%	88.1%	61.9%	62.4%
60% - 80%	0.0%	2.5%	0.0%	0.3%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,903	437	1,498	3,838

Overcrowded Households

Regional Trends

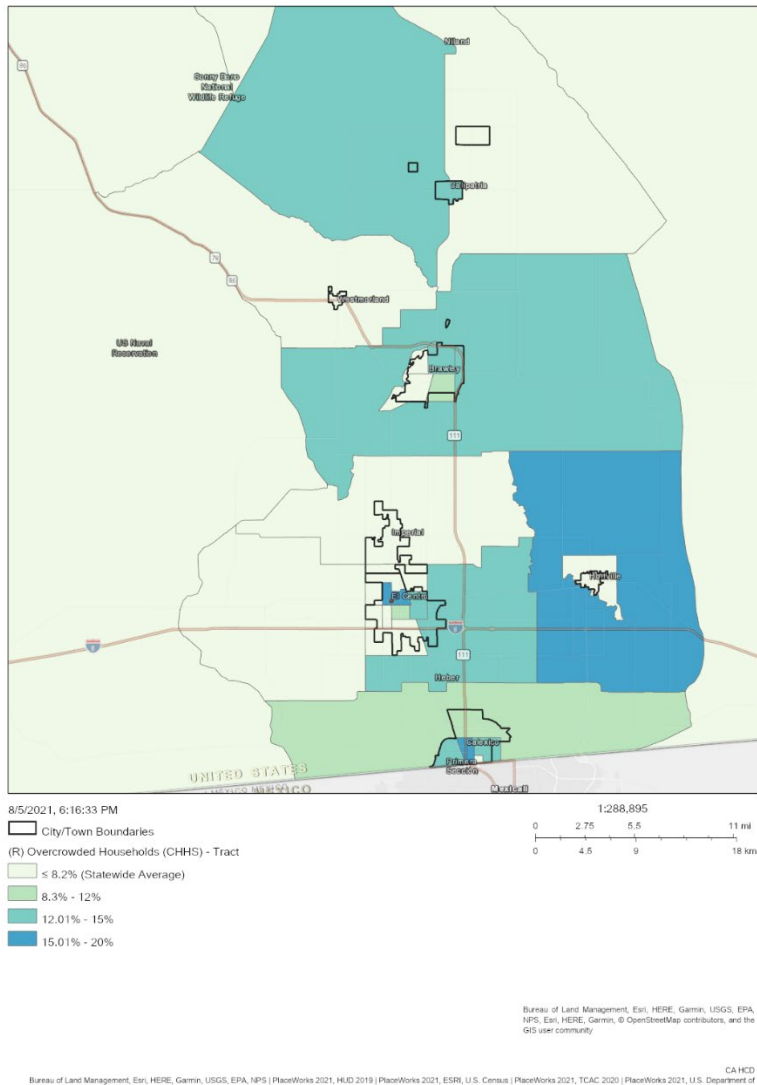
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2019 five-year ACS estimates, about 11 percent of households in the County are living in overcrowded conditions (Table D-21). Over 16 percent of renter households are living in overcrowded conditions, compared to only seven percent of owner households. Overcrowded households in the region are concentrated in Calexico, El Centro, and tracts surrounding Brawley and Holtville. The census tract that contains Calipatria also has a concentrated of overcrowded households, where between 12.5 and 15 percent households are experiencing overcrowded conditions.

Table D-21: Overcrowded Households- Imperial County

	Overcrowded (>1.0 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	6.6%	2.5%
Renter Occupied	16.3%	4.4%
All HH	10.7%	3.3%

Source: American Community Survey, 2015-2019.

Figure D-32: Overcrowded Households - Region



Local Trends

Households in the City of El Centro experience overcrowded conditions at higher rates than the County. Twelve percent of El Centro households are living in overcrowded conditions (compared to 10 percent of County households). Like County households, renters are more likely to experience overcrowded conditions than owners (17 percent versus seven percent, respectively). Within the City, most of the census tracts east of the railroad tracts as well as those east of the railroad tracts and north of E Ross Rd between 12 and 15 percent of households experiencing overcrowding. However, census tracts in the north center of the City have the highest concentration of overcrowded households (about 17 percent of households).

Table D-22: Overcrowded Households- City of El Centro

	Overcrowded (>1 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	7.0%	3.0%
Renter Occupied	17.1%	4.8%
All HH	12.0%	3.9%

Source: American Community Survey, 2015-2019.

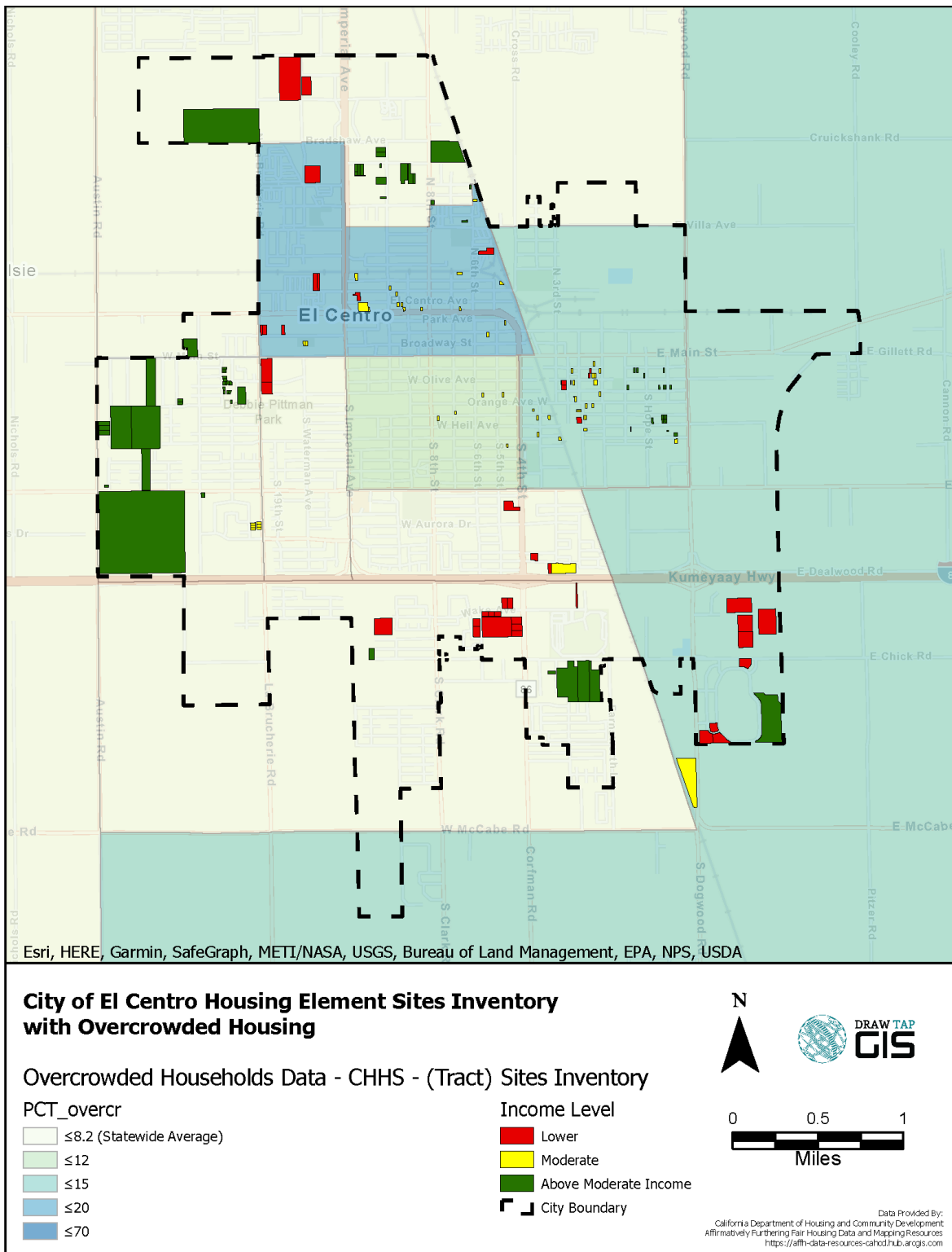
Distribution of RHNA Units by Overcrowded Households

Census tracts in the City have a wide range of households living in overcrowded households; most have less than 8.2 households (statewide average) living in overcrowded conditions but tracts with 12 and 15 percent households in overcrowded conditions are second most common. As shown in Table D-23 and Figure D-33, the distribution of RHNA units resembles the distribution of concentration of overcrowded households with about 61 percent of all RHNA units are located in census tracts with the lowest concentration of overcrowded households, and a third in tracts with 12.01 to 15 percent overcrowded households. Of the 1,903 lower income units, about half are located in tracts with the lowest rates of overcrowding while the other half are in tracts with households in overcrowded conditions ranging from 12 to 20 percent.

Table D-23: RHNA Unit Distribution by Overcrowded Households

	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
≤ 8.2 (Statewide Average)	51.8%	12.1%	87.4%	61.2%
8.2- 12%	0.0%	2.5%	0.0%	0.3%
12.01-15%	36.8%	66.4%	12.5%	30.7%
15.01- 20%	11.5%	19.0%	0.1%	7.9%
>20%	0.0%	0.0%	0.0%	0.0%
Total Units	1,903	437	1,498	3,838

Figure D-33: Overcrowded Households- City of El Centro



Substandard Conditions

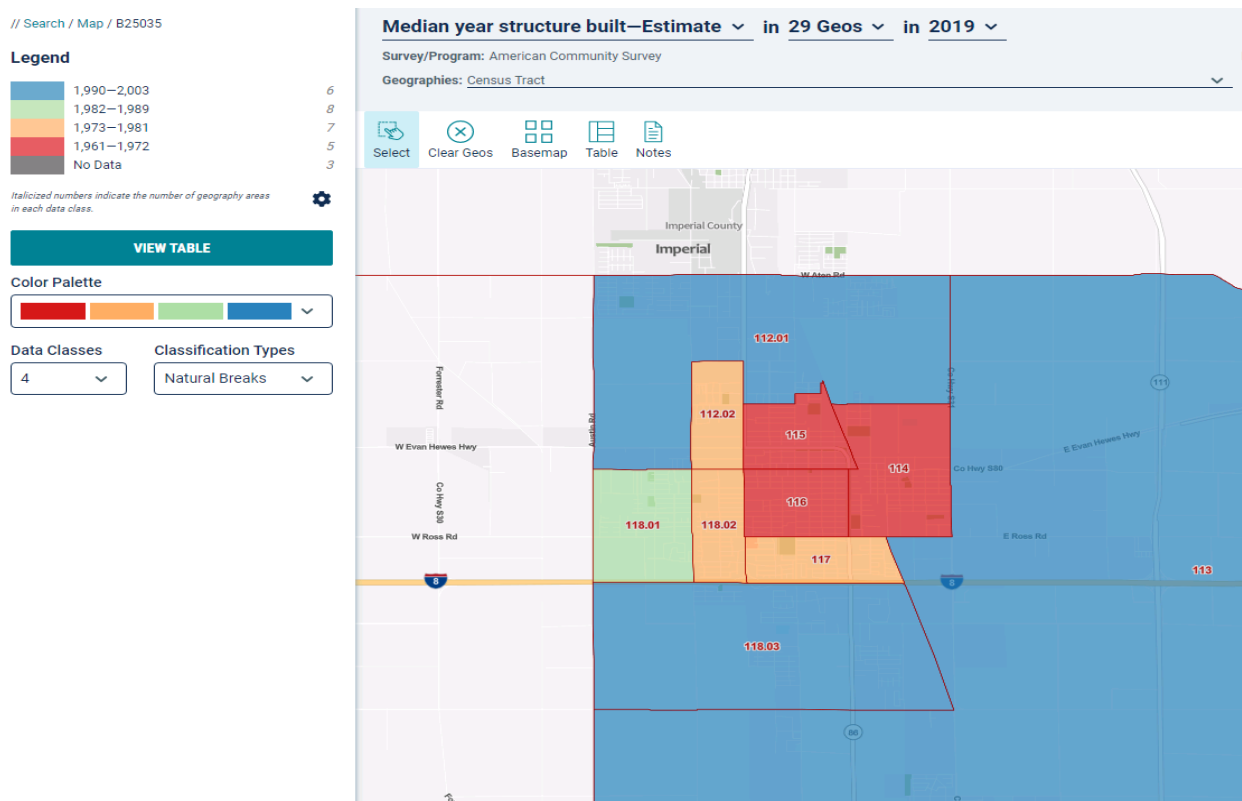
Regional Trends

Housing that is 30 years or older is assumed to require some rehabilitation. Such features as electrical capacity, kitchen features, and roofs, usually need updating if no prior replacement work has occurred. According to the 2015-2019 AC estimates, nearly 50 percent of Imperial County’s housing stock was built before 1990 (is over 30 years old) and only 28 percent of housing was built in the last 20 years. The cities of Westmoreland, El Centro, and Holtville have the oldest housing stock in the county, with over 65 percent of their housing stock aged 30 or older.

Local Trends

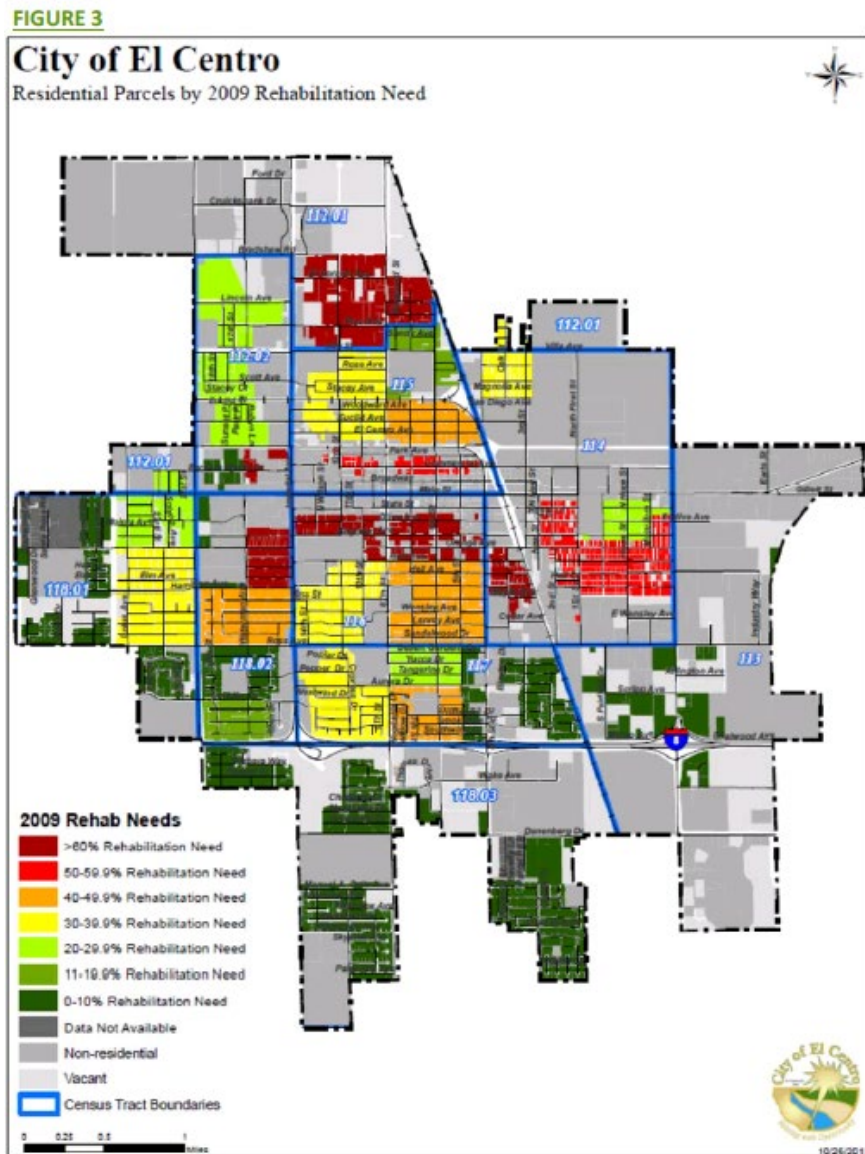
While the City of El Centro has one of the oldest housing stocks in the County (over 68 percent is over 30 years old and 33 percent is over 50 years old), an estimated 14 percent are need of substantial repair within the City. Figure D-34 shows the median year housing units were built within the City. Older housing is found in center tracts of City while newer housing is along the outer edges.

Figure D-34: Median Year Structure Built – City of El Centro



The City published a Housing Conditions Report in 2015 which surveyed 2,180 of the units within the City boundary to determine the conditions of the housing stock. The report concluded that approximately 69 percent of the units surveyed are in need of some type of repair; however, the majority of replacements recommended are not substantial and/or costly in nature. In summary, the survey showed that a majority of Multi-Family and mobile home units are in good condition and not in need of moderate to major repairs. As the majority of units surveyed are single-unit, as well as the majority of units in the City; it is anticipated the greatest need to be derived from the Single-Family Unit classification along with their corresponding need for repairs. The single-most common repair identified was that of window replacement, as it was also identified in the 2008 *Housing Conditions Survey*. Figure D-35 shows the rehabilitation need by parcels published in the 2015 Housing Conditions report. Parcels in the central census tracts have higher rehabilitation needs than in the edges of the City.

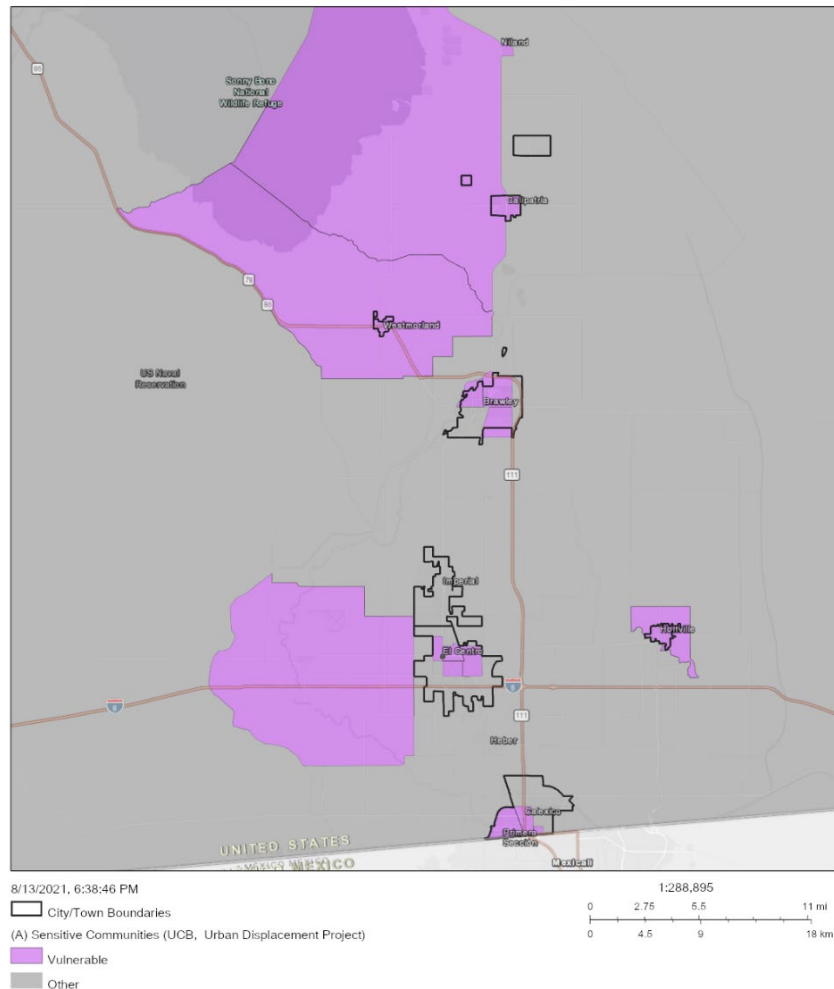
Figure D-35: Residential Parcels by 2009 Rehabilitation Need



Displacement Risk Regional Trends

UC Berkley’s Urban Displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the research has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities were identified in census tracts in the major cities of the County including Calipatria, Westmorland, Brawley, El Centro, Holtville, and Calexico (Figure D-36).

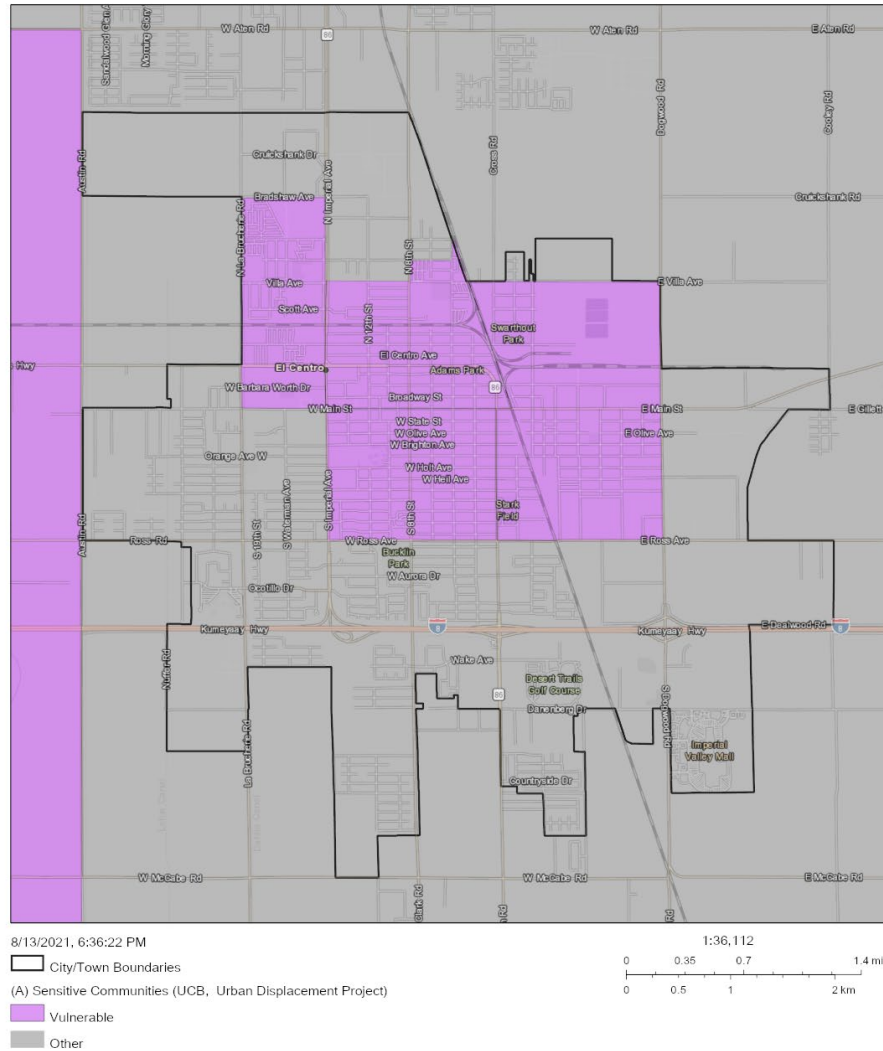
Figure D-36: Sensitive Communities- Region



Local Trends

Many census tracts within the City of El Centro were identified as vulnerable communities (Figure D- 37). Vulnerable communities are located in the center of the city. The census tracts west of N La Brucherie Avenue, South of E Villa Avenue, west of Dogwood Avenue, and north of Ross Ave were identified as sensitive communities.

Figure D- 37: Sensitive Communities- City of El Centro



F. Other Relevant Factors

Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

Table D- 24: Loan Applications and Approvals by Race (2017)

	City of El Centro			El Centro MSA		
	% Applicant Pool	% Population	% Approved	% Applicant Pool	% Population	% Approved
White	12.2%	9.6%	58.6%	8.8%	11.3%	76.9%
Black	1.3%	1.9%	53.8%	0.9%	2.3%	88.9%
Hispanic	70.5%	85.8%	61.5%	85.2%	83.4%	79.3%
Asian	1.2%	1.9%	56.5%	0.6%	1.3%	50.0%
All	1,966	43,932	59.4%	1,040	150,108	78.4%

Sources: FFIEC Table 4-1: Disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings, by race, ethnicity, gender and income of applicant, 2017 MSA/MD: 20940 - El Centro, CA (<https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/CA/20940/4-1>), El Centro FFIEC Summary Table, 2017 Lendingpatterns.com. American Community Survey, 2013-2017.

Regional Trends

County HMDA is reported as the EL Centro MSA by the FFIEC HMDA Website. In the El Centro MSA, the applicant pool reflects the County’s racial/ethnic distribution. Hispanics made up 83 percent of the population in 2017 and 85 percent of the applicants. However, approval (and inversely denial rates) were different between the races/ethnic couples. Asians had the lowest approval rating, with 50 percent of their applications approved while Blacks had the highest. Approval rates in the County overall was 78 percent.

Local Trends

Lending trends in the City of El Centro were different from the El Centro MSA. Hispanic applicants were underrepresented in the applicant pool compared to their distribution of the population. Approval rates in El Centro (59 percent) the were lower than the County (78 percent) but did not differ much between races for the City (ranging from 54 to 62 percent). However, Hispanics did have higher approval rates than other races.

The 2019 El Centro AI also did an analysis of lending patterns by census tract within the City of El Centro. The AI reported that three census tracts have unusually high denial rates that exceed 20 percent or more: 112.02, 115.00 and 116.00. In addition to high denial rates, these census tracts had some of the lowest number of total applications to buy a home (Table D- 25). HUD is

concerned when high denial rates may be caused because of the race, color or national origin characteristics of the census tract/neighborhood. However, Hispanics comprise 80 percent (1,099/1,369) of all loan applicants in Imperial County. The AI concluded that loan application activity in census tract 112.02 and other census tracts should be monitored annually to detect trends in loan denial rates and the possible causes for unusually high loan denial rates. This could involve working with the lenders who have denied loans in order to gather information that could assist would be homebuyers to increase the probability of garnering loan approval.

Table D- 25: Loan Denial Rates by Census Tract (2017)

Census Tract	FHA/VA/FSA Loans			Conventional Loans			All Loans		
	Total Apps.	# Denied	% Denied	Total Apps.	# Denied	% Denied	Total Apps.	# Denied	% Denied
112.01	114	8	7.0%	65	6	9.2%	179	14	7.8%
112.02	2	0	0.0%	9	5	55.6%	11	5	45.5%
113.00	45	3	6.7%	22	4	18.2%	67	7	10.4%
114.00	16	2	12.5%	17	2	11.8%	33	4	12.1%
115.00	13	3	23.1%	10	2	20.0%	23	5	21.7%
116.00	31	5	16.1%	35	9	25.7%	66	14	21.2%
117.00	32	4	12.5%	36	4	11.1%	68	8	11.8%
118.01	20	3	15.0%	56	6	10.7%	76	9	11.8%
118.02	30	3	10.0%	27	1	3.7%	57	4	7.0%
118.03	40	7	17.5%	55	6	10.9%	95	13	13.7%
Total	343	38	11.1%	332	45	13.6%	675	83	12.3%

Source: : Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA), Loan Application Register System (LARS) 2017. Table construction by Castañeda & Associates. From 2019-2024 Analysis of Impediments to Fair Housing.

Since the number one known reason why borrowers are denied approval of a loan application is an excessive debt-to-income ratio, loan denial rates can be reduced by providing all homebuyers, but especially first time homebuyers, with information of the loan application and approval process. According to the 2019 AI, the Inland Fair Housing and Mediation Board (IFHMB) will take the following actions during the 2019-2024 planning period to address the possible impediments related to high denial rates:

- Continue to offer first-time home buyer seminars to explain to borrowers the need to lower debt-to-income ratios to a level acceptable to lenders. Implementation of this recommended action should result in better prepared borrowers and cause an increase in loan approval rates of all loan applicants, regardless of race or ethnicity.
- Work with the lenders to determine why a few census tracts have high loan denial rates in order to gather information that could assist would be homebuyers to increase the probability of garnering loan approval for homes in neighborhoods of their choice.

The City will ensure the IFHMB takes these actions by the end of 2022.

Property Management Practices

Property management policies and practices are of keen importance to El Centro residents. The vast majority of the 6,200 renter households reside in apartment communities. According to the 2019 AI, the majority of renters (approximately 3,800) live in apartments. El Centro renters either predominantly younger (<35 years of age, 57 percent of renters) or older (75 years of age, 28.4 percent of renters).

The 2019 AI reported the results of a telephone survey of seven affordable and eight market-rate apartment complexes to assess property management practices. The results of the telephone surveys is representative of the knowledge of fair housing laws currently held by El Centro's on-site managers. The seven affordable developments include 633 privately owned apartment units and excluded those owned by the Imperial Valley Housing Authority. The eight market developments include 909 apartment units. The apartment survey included questions concerning property management policies that relate to fair housing such as:

- Occupancy limits
- Allowing service and/or companion animals
- Allowing physical modifications and reasonable accommodations
- Written policies pertaining to the above topics
- Extent of knowledge of fair housing laws

The survey results showed that the vast majority of affordable and market rate apartment communities adhere to the DFEH intake guideline⁶ of 2 + 1. The occupancy limits of the apartments surveyed did not cause a fair housing impediment. Eleven of the 15 apartment communities allowed reasonable accommodations. Almost all of the developments permitted service and companion animals. Six of the 15 developments do not have written policies concerning reasonable accommodations, reasonable physical modifications, service animals and companion animals. Of the 15 apartment managers, four of the stated they are "Somewhat familiar" with fair housing laws" while two (both market rate) stated that they were "Not familiar at all."

The 2019 AI concluded that impediments to fair housing choice existed because of ill-informed property management practices. Therefore, subject to funding availability, the City committed to implementing the following actions:

- Invite the apartment managers to one or more workshops; the topics could include
- Fair housing laws in general
- Fair housing laws regarding occupancy limits
- Fair housing laws regarding reasonable accommodations and modifications
- Sample written policies regarding service and companion animals

⁶ HUD's occupancy standards for assisted housing is generally two persons per bedroom but is not believed to be an appropriate basis for guiding private housing providers. The California Department of Fair Employment and Housing (DFEH) in 1988 established an intake guideline of accepting complaints for investigation of the potential of an adverse impact where the occupancy limitations per unit are more restrictive than two persons per bedroom plus one, or five persons in a two bedroom unit.

- Distribute information on the above and other topics and distribute it to the apartment managers of all small, medium and large apartment complexes.

Environmental Justice Communities

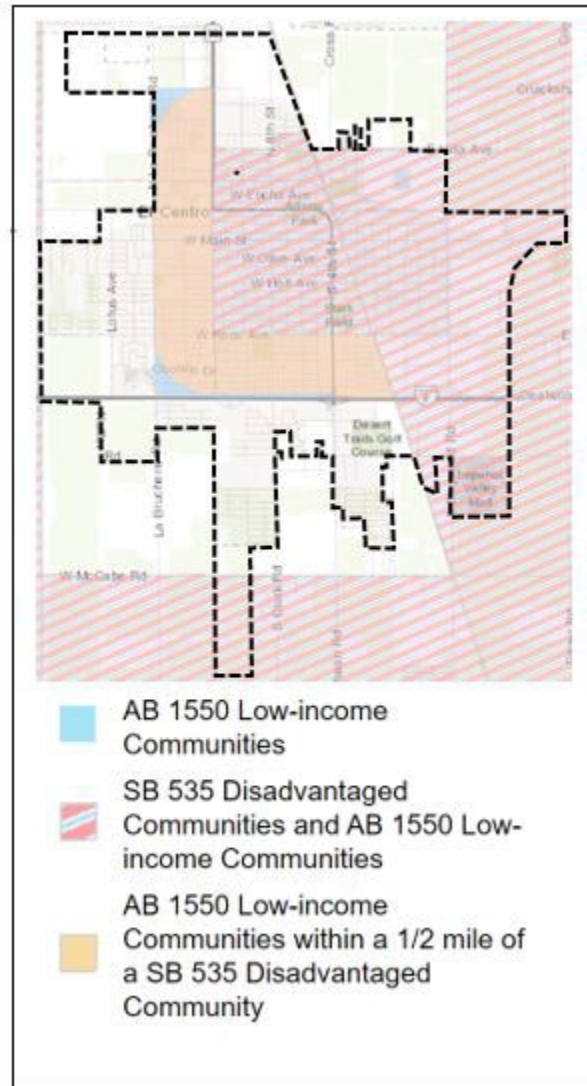
Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time they’re reducing pollution that causes climate change.

Any jurisdiction can choose to include policies focused on environmental justice (EJ) in their General Plan, but an EJ Element is required under state law for any city or county that includes disadvantaged communities. For the purposes of environmental justice, a disadvantaged community is defined as, “An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”

Senate Bill 535 defines disadvantaged communities as the top 25% scoring areas from CalEnviroScreen. Assembly Bill 1550 defines low-income communities using census data, statewide median income data, and state Department of Housing and Community Development income limits. As shown below (Figure D-38), about 2/3 of the City of El Centro meets one or both of these definitions.

Based on the pollution data for El Centro, much of the city is disproportionately affected by environmental pollution. In particular, impacts from ozone pollution and pesticides affect the majority of residents. Because so much of El Centro meets state definitions for low income or disadvantaged communities, and is disproportionately impacted by environmental pollution, the entire city will be considered an Environmental Justice Community for the purposes of the policies in its EJ Element. While some of the policies are aimed at specific areas, most are relevant to all communities within the City of El Centro.

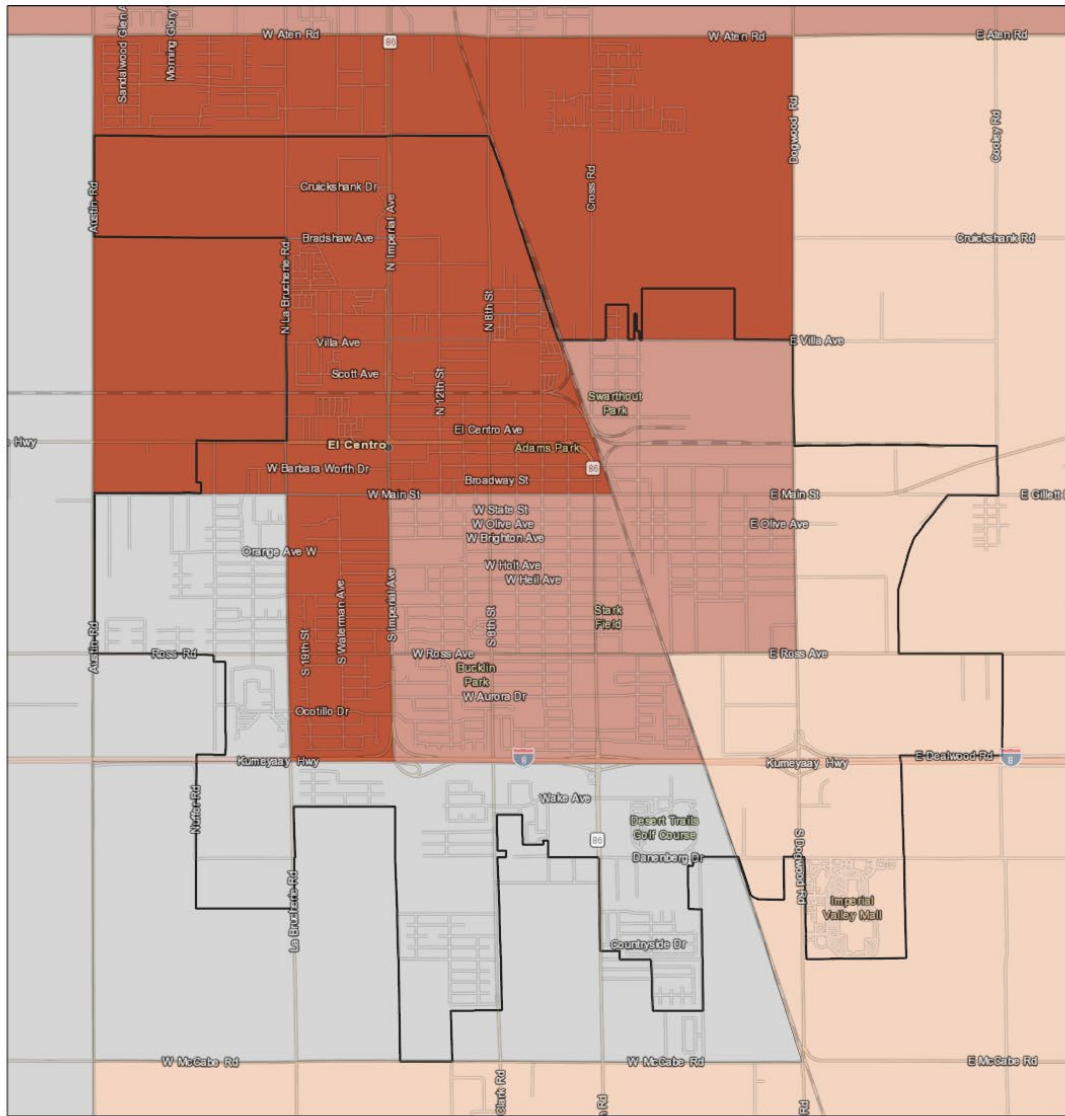
Figure D-38: Disadvantaged Communities- City of El Centro



Housing Choice Vouchers

Trends related to housing choice vouchers (HCV) can show patterns of concentration and integration. As of December 2020, 933 El Centro households received Section 8 assistance from the Imperial Valley Housing Authority. The map in shows that HCV use is concentrated in the northern quadrants of the City, but mostly on its northwestern census tracts. In these tracts, between 15 and 30 percent of the renter households are HCV users. This may be because these areas have lower “affordability index” or median gross rents than the southern tracts of the City (Figure D-40). Despite low rents, at least 20 percent of renter households in these areas are considered cost-burdened (Figure D-31).

Figure D-39: HCV Concentration- City of El Centro



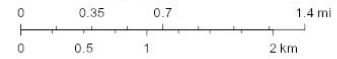
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City/Town Boundaries

(R) Housing Choice Vouchers - Tract

- No Data
- > 0 – 5%
- > 5% – 15%
- > 15% – 30%

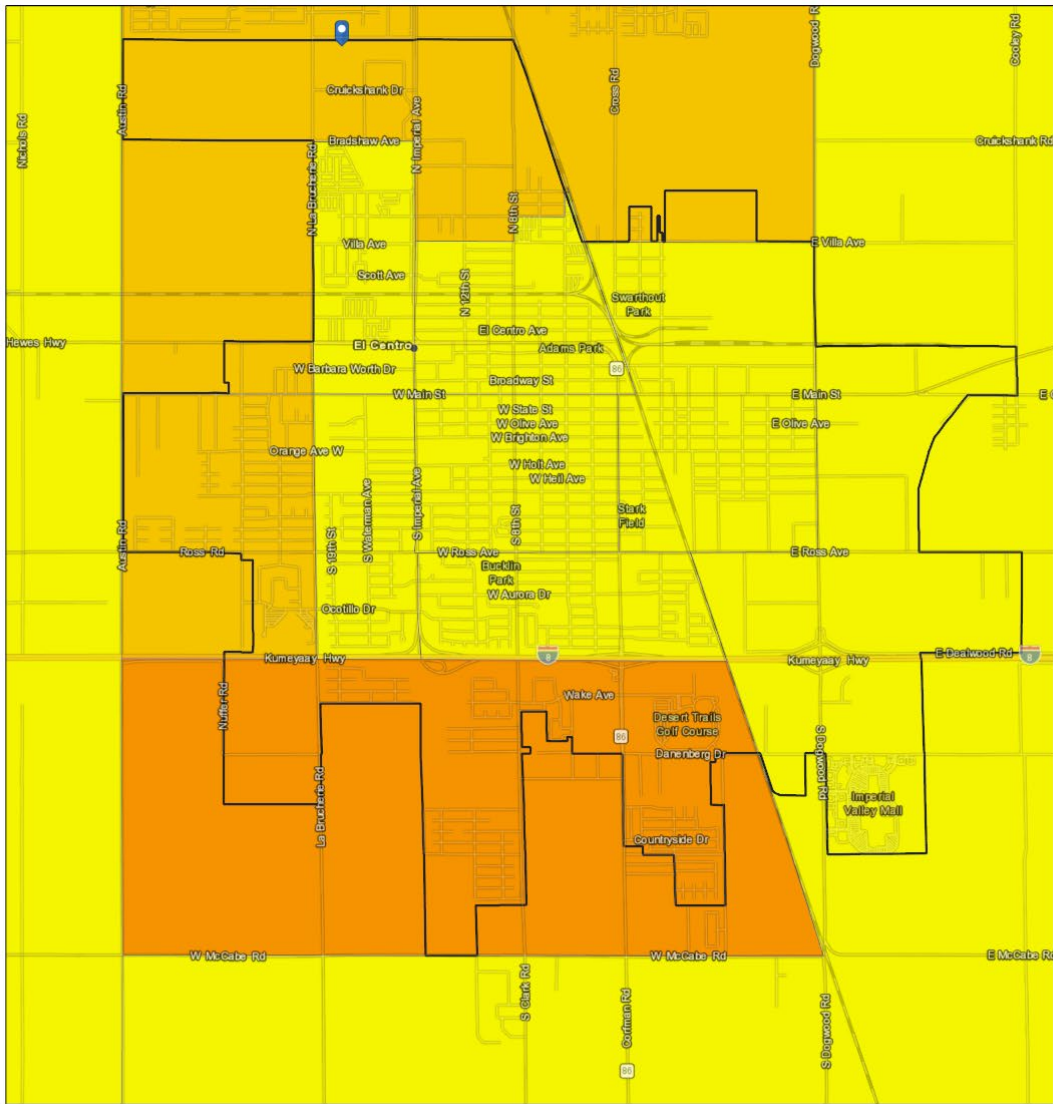


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CA HCD

Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S.

Figure D-40: Median Gross Rent/ Affordability Index - City of El Centro



8/16/2021, 7:45:54 PM
 City/Town Boundaries
 (R) Location Affordability Index (HUD) - Tract
 <\$1,000
 <\$1,500
 <\$2,000

1:36,112
 0 0.35 0.7 1.4 mi
 0 0.5 1 2 km

Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. CA HCD

El Centro’s 2019-2024 Analysis of Impediments to Fair Housing Choice (2019 AI) revealed an impediment to fair housing choice because HCV assisted households disproportionately reside

in Census Tract 115.00. HUD promotes the goal to not locate affordable housing within racially/ethnically concentrated areas of poverty which refers to neighborhoods (census tracts) with a non-white population of 50 percent or more and a poverty rate of 40 percent or more. Census Tract 115.00 meets the two thresholds and, therefore, is a R/ECAP. According to the 2019 AI, in 2014, Census Tract 115.00 had the highest number and percentage of Section 8 assisted households. Almost one-third of all HCV householders reside in Census Tract 115.00. About 17 percent of the housing units located in this census tract are occupied by HCV assisted households. This census tract also has a concentration of low income households and minority populations.

From among the participating apartments, HCV holders may reside in a unit of their choice. However, the Imperial Valley Housing Authority (IVHA) should provide new HCV holders with an inventory of housing opportunities located outside of Census Tract 115.00. Since ninety percent of Imperial County's population belongs to a minority group, housing occupied by public housing and HCV assisted residents is likely to be located in a neighborhood or census tract where the majority of the population is a member of a minority group. Since finding housing in a tract with a low minority concentration is unlikely, the AI stated that the IVHA would focus its efforts during the 2019-2024 planning period to "continue to actively encourage families to seek housing in neighborhoods with low concentrations of low income families."

One way to do so is to encourage the use of the TCAC Opportunity Maps by HCV holders when trying to find housing. With this tool, IVHA and the City may direct HCV holders to finding housing in areas of high opportunities. The TCAC maps, in combination with outreach of the state's new Source of Income Protection laws(SB 329 and SB 222)⁷, can promote housing opportunities in areas with higher resources and deconcentrate HCV use in Census Tract 115.00.

Local Knowledge **R/ECAP Area**

Census tract 115 was identified as a R/ECAP based on HCD AFFH Mapping Tool (Figure D-14). This area is affected by a concentration of lower income residents with disproportionate needs and limited access to opportunities due to the age of housing, development trends, and tenure of residents. Census tract 115 has among the highest concentration of renter households in the whole City- about 65 percent of households are renters. Though there is a variety of housing types (single family residences and two to four unit multifamily buildings) in the tract, housing units are very old in this area. In addition, this tract has a significant mobile home community, which tend to be lower income. While the R/ECAP tract is aggregated as single census tract, it consists of four separate residential neighborhoods separated by major roadways, railroads, and public facilities. Below is a list of distinct areas within the R/ECAP area based on time of development and residential structure composition.

- South of Adams Avenue Area - This residential area consists of parcels located on Park Avenue and Commercial Avenue between N. 12th Street and N. 4th Street. According to subdivision maps, development of this area occurred in the 1900s and 1910s. Residential

⁷ Beginning on January 1, 2020, housing providers, such as landlords, cannot refuse to rent to someone, or otherwise discriminate against them, because they have a housing subsidy, such as a Section 8 Housing Choice Voucher, that helps them to afford their rent. For more information, https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/02/SourceofIncomeFAQ_ENG.pdf

development in this area is a mixture of single family residences and two to four unit multifamily buildings.

- North of Adams Avenue Area - This residential area consists of properties north of Adams Avenue and south of the Union Pacific Railroad. Parcels are located on El Centro Avenue, Euclid Avenue, and Woodward Avenue. Development of this area began in the 1910s. Residential development in this area is a mixture of single family residences and two to four unit multifamily buildings.
- West of 8th Street Area - This residential area consists of properties north of the Union Pacific Railroad and west of 8th Street. Parcels are located on Oleander Avenue, Rose Avenue, Scott Avenue, and Stacy Avenue. Development in this area began in 1950s for the area between 8th Street and 12th Street though the late 1970s for the area west of 12th Street. Residential development in this area consists substantially of single family residences.
- Kennedy Middle School Area - This residential area includes the properties to the north and east of Kennedy Middle School. It consists of several mobile home parks along 8th street between the Union Pacific Railroad and Villa Avenue, a single family and condominium neighborhood north of Villa Avenue and south of Pico Avenue. Mobile home developments were established before the 1960s while the single family development and condominium areas were constructed in the 1980s

Census Tract 115.00 was also affected by a pattern of disinvestment following the construction of US Route 80 beginning in the 1920s. Census Tract 115 is bisected by Adams Ave/State Route 86 and was once a commercial corridor with retail and lodging . US Route 80, which connects from San Diego, California to Savannah, Georgia along the southern US, is located a few streets down from Adams Avenue/State Route 86 and rerouted the City's commercial corridor south as well. As a result, much of the commercial activity declined along Adams Avenue.

The City has been continually investing in Census Tract 115 over the past five years through the construction and renovation of community facilities including an Aquatic Center, Sidewinder Skate Park , Martin Luther King Jr. Pavilion, and the El Centro Public Library that is currently under construction (while it is not inside of Tract 115, it is right across the street from Census Tract 115) The City also installed bike lanes on 8th Avenue throughout the entire census tract providing active transportation options. Planned projects in the area include undergrounding Date Canal, which runs east/west along Villa Avenue. The undergrounding of the canal will create a healthier and safer community for residents. Another investment that being worked on is a grant application to create a parking lot at Frazier Field (baseball park within the census tract) for dust control purposes and to reduce air pollution.

The updated Land Use Element (adopted June 2021) identified a portion of Adams Avenue which falls within the RECAP as an Opportunity Area (OA-1) and re-designated into Mixed-Use I uses. As a corridor with many older commercial properties, it was identified as a corridor both in need of revitalization and an area that offers significant opportunities to provide a variety of new housing types and neighborhood commercial uses. This corridor has recently experienced redevelopment of several older motels into affordable dwelling units, a trend that the new MU-1 designation acknowledges and promotes. A total of 2.47 acres on five vacant parcels that are designated MU-1 along the Adams Avenue OA were selected in the sites inventory to accommodate at least 47 moderate income units within the 2021-2029 RHNA period. According

to the Land Use Element “Revitalization [of the Adams Avenue OA-1] will capitalize on the proximity to the Civic Center District, Downtown El Centro (OA-2), the Aquatic Center, and the Skate Park by orienting new development to the street to take advantage of an enhanced pedestrian and bicycle infrastructure and attractive streetscape. Innovative land uses and development types, flexible development standards, emphasis on quality building and site design, and creation of a Visual Enhancement Area plan for the Adams Avenue OA will encourage infill development and re-use of under-utilized properties and stimulate investment.”

The R/ECAP is also directly south of the El Dorado Colonia. HUD and USDA Rural Development both define colonias as rural communities within the US-Mexico border region that lack adequate water, sewer, or decent housing, or a combination of all three. While the specific definition of colonias differ from the iconic image of a colonia as a scattered rural homestead on inappropriately subdivided land to dense settlements of modular housing or trailer homes, HUD states no matter how or where colonias formed, they typically form in response to a need for affordable housing that gives people a sense of ownership. The El Dorado Colonia areas consists of the area bounded by Bradshaw Drive to the north, the Union Pacific Railroad to the east, Villa Avenue to the south, and Imperial Avenue to the west. These areas typically have high rates of poverty and often have been developed without the level of public facilities associated with newer development that meets governmental regulations. The El Dorado Colonia is characterized by large lot, rural character residential development. The City has been working to improve the infrastructure within this area and will continue to implement programs that improve the quality of life for the residents and visual appearance of the area.

History of Segregation

El Centro used to be a home to a large African American population that has since seen its numbers decline. As of 2019, only 1.7 percent of the City’s population was African American. However, the east side was once a well-known segregated African American community. El Centro’s east side African American community took root in the 1900s, following the migration of African American workers into the Valley.⁸ Growers associations advertised for workers in the South as the popularity of cotton increased during this time.⁹ By 1913, the segregated Booker T. Washington Elementary School was established, following the El Centro’s Elementary School District formal adoption of segregation policies.¹⁰ The African American population declined in the later decades in the search for better opportunities, with Hispanics eventually becoming the majority population in the east side and the City overall. While the City’s east side is no longer a Black Community, it is still considered an area of high segregation and poverty according to 2021 TCAC scores (Figure D-18) and vulnerable community (Figure D-38). The east side community is located near the train tracks and its residential uses (low, medium, and high density) were and remain surrounded by industrial and commercial uses. Housing in this area was also identified as the second highest priority areas by the 2009 Housing Conditions Survey (see Figure D-35). Between 50 and 60 percent of units in this area were estimated to need some kind of rehabilitation.

⁸ Morales, Julio. (2020, March 6). *Washington School's history is local black history*. IVPressOnline.com. https://www.ivpressonline.com/valleywomen/washington-schools-history-is-local-black-history/article_01242534-5f2c-11ea-bbe2-8f5adbc00bc9.html

⁹ Ibid.

¹⁰ Ibid.

Dominance of Low Density Housing

El Centro's housing stock is primarily single-family housing (60 percent) or low density multifamily (2-4 units, 10 percent). Multifamily buildings with more than 5 units only make up about 20 percent of the City's housing stock. In the past decade, However, in the stakeholder interviews, developers expressed that single-family new inventory is too expensive for the El Centro buyer market (\$250,000 to \$300,000) and that more multi-family affordable housing was needed. Developers also cited infill development and mixed uses as housing development opportunities. The Mixed Use 1 (MU-1) and Mixed Use 2 (MU-2) Overlay land use designations created for the Land Use Element update provide new opportunities for new multi-family residential opportunities, either as stand-alone residential developments or as part of mixed use projects, in areas that are on or near key commercial corridors in proximity to transit, existing and proposed pedestrian and bicycle paths, and shopping and other services. These two new mixed use designations were applied to former commercial land use designations to facilitate the trend the City has experienced, whereby developers have been applying and receiving approval for discretionary permits to change commercially designated/zoned property to the High-Medium Residential land use designation/R-3 zone to allow multi-family residential projects.

Fair Housing Issues

As described in the Fair Housing and Outreach section of this assessment, knowledge about the fair housing services and likely other programs offered by the City are not well known and resident participation is low. A survey done as part of the AI received no responses and another survey done during the Housing Element planning process only had five respondents, most of which were not aware City's fair housing services.

The City already has a Housing Rehabilitation Program and a Façade Improvement Program to improve the conditions of the area. The City's CDBG Housing Rehabilitation program is currently available Citywide to eligible census tracts (at least 51 percent of population is low or moderate income) but will conduct targeted outreach in Census tract 115, identified as a R/ECAP, to increase participation in the program. The City's Façade Improvement Program on Main Street is available for neighborhood serving business to help retain and improve the neighborhood services. Since the assessment showed a lack of awareness of fair housing services and other programs and the City does not have access to more resources, City's AFFH strategy includes raising awareness of the existing resources to the City's identified R/ECAP.

The City already does targeted outreach in this census tract as part of the Inland Fair Housing and Mediation Board Annual Fair Housing Event. However, as this strategy seems to be ineffective, the City will include meaningful actions to strengthen its targeted outreach efforts in in Census Tract 115, which is identified by HUD as a racial/ethnic concentrated area of poverty and segregation (RECAPs). In particular efforts will focus on increasing participation in City programs. These efforts will include the following:

- Application Workshop - City staff will host a yearly application workshop at the M.L. King Jr. Sports Pavilion or another City facility in Census Tract 115. The workshop will assist residents in completing applications for the City Housing Rehabilitation Loan Program and First-Time Homebuyer Program. The workshop will also provide an opportunity for City staff to gain valuable input from residents on the City housing programs. Assistance will be provided in English and Spanish.

- Direct Mailing Campaign - City staff will coordinate a yearly direct mail campaign to addresses within Census Tract 115 informing residents about City housing programs. Additional mailings within Census Tract 115 will also announce application workshops. Letters will be in English and Spanish to meet the language needs of residents.
- Postings - Flyers and posters will be posted at neighborhood businesses within Census Tract 115 informing residents of the availability of city housing programs and workshops. Possible locations for postings include Coin-O-Matic (laundromat), Euclid Market (market), Raspados Cuchies (restaurant), Los Compadres (market), or Antonio's Meat Market (market). Postings will be in English and Spanish.

D.4 Site Inventory

AB 686 requires a jurisdiction's site inventory "...shall be used to identify sites throughout the community, consistent with..." its duty to affirmatively further fair housing. The number of units, location and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to all components of the assessment of fair housing was integrated throughout the discussion in the fair housing assessment section.

The El Centro Sixth Cycle Housing Element significantly expands the number of sites available for lower and moderate income households, as well as the distribution of those sites throughout the city. The recently updated Land Use Element, which was prepared as a parallel effort to the Housing Element update, provides new opportunities for stand-alone residential and mixed use development in areas of the city that were not available previously. These areas include the southern portion of the city (south of I-8), which currently contains that majority of the highest income households in El Centro, and in high-resource areas in the northwest portion of the city. These expanded opportunities are specifically intended to dilute concentrations of poverty and facilitate a more economically integrated community.

RHNA sites are not geographically concentrated in any specific area. Sites are scattered throughout the city, with larger sites of a variety of incomes found along the edges and smaller scattered sites within the center of the City. Generally, RHNA site distribution followed the patterns of distribution of the components/characteristics of the assessment of fair housing.

Some patterns of concentration as well as disparate needs and access to resources exist in El Centro. Generally, the census tracts with a concentration low and moderate income household and children, or identified as RECAP's, and areas of high segregation and poverty were located in the center of the City, usually south of Villa Avenue and north of Ross Avenue (though sometimes extending all the way to Interstate Highway 8. These central census tracts, as well as census tracts east of the railroad tracts were also classified as areas of low resources and had disproportionate concentrations of cost-burdened renter households and overcrowding. Sensitive communities at risk of displacement and older housing stock is also concentrated in these areas.

Sites in the center of the city are usually smaller scattered sites with a variety of income feasibilities. It is the City's intent to promote mixed-income communities to improve the

conditions of these areas with concentrated disparities. By placing units designated for higher incomes, the conditions in these areas can potentially improve. At the same time, the City cited lower income units in areas that do not have as many concentrated problems. For example, about 52 of lower income units are located in areas with high and moderate resources.

Mixed-income RHINA units throughout the City can potentially diversify the socioeconomic profile in the area. Without the infusion of private investments in the central tracts of the City, this area would continue its path of deterioration. The City plans to leverage the goals and objectives of the Environmental Justice Element to invest in specific areas of the City (the center) and Citywide (since over 2/3 of the City was identified as having disadvantaged communities and low and moderate income households).

The City's Land Use element addresses the City's existing needs by making a balanced, sustainable, and equitable mix of land uses based on Smart Growth Principles to meet the social, economic, housing, health, educational, and quality of life needs of El Centro's residents as one of its primary goals. The Land Use element provides a variety of residential land uses that accommodate a range of housing types offers residents options to meet their particular personal and financial needs, whether it is a stand-alone single-family house, an apartment or townhouse, or a unit in a senior-oriented development. While many of the existing neighborhoods in El Centro are built out, others—especially in the low-medium and medium density designations—have unique lot sizes and shapes that have not been developed to their full potential. The sites inventory leverages the changes and goals of the Land Use element to improve the existing conditions for EL Centro residents by:

- Facilitating “Missing Middle”¹¹ housing in both existing and new neighborhoods to provide housing options along a spectrum of affordability (by distributing sites across the City and encouraging mixed income housing);
- Encouraging infill housing; and
- Correlating residential policies with other General Plan policies to encourage housing that is walkable, close to local services, parks and recreation facilities, and is adequately served by the City's infrastructure and services

D.5 Summary of Fair Housing Issues and Contributing Factors

Below is a summary of the fair housing issues and contributing factors. Contributing factors were evaluated and prioritized. Contributing factors were priority based on their impact on fair housing issues as well as the City's ability to address the contributing factors. Prioritized contributing factors are numbered.

A. Fair Housing Enforcement and Outreach

Issue #1: Insufficient fair housing testing and limited outreach capacity

¹¹ Missing Middle Housing is a range of house-scale buildings with multiple units—compatible in scale and form with detached single-family homes—located in a walkable neighborhood. Examples include side-by-side duplexes, stacked duplexes, stacked fourplexes, courtyard buildings, and cottage courts. For more information: <https://missingmiddlehousing.com/>

El Centro did not report any results from Fair Housing testing in its 2019. According to the 2019 AI, Inland Fair Housing and Mediation Board's (IFHMB) scope of services does not include fair housing testing. As such, it does not appear that the City actively and routinely conducts fair housing testing. As found in HCD's 2020 AI, a fair housing testing program and funding is necessary. In addition, despite extensive outreach efforts, participation on outreach events is low. There were no respondents for the 2019 AI fair housing survey and only five respondents for a survey at a Housing Element Community workshop. Most respondents (four out of five) were not aware of the Fair housing program provided by the City. Respondents said More services, Services in Spanish, Evening services, and Transportation to services is needed and that the best way to disseminate data is through social media. The City needs a targeted approach to outreach and education, especially for residents in the central census tracts of the City. According to the City's 2019 AI, with respect to the fair housing impediment of housing discrimination and outreach, the following actions will be taken:

- “The City will continue to offer to its residents fair housing services which will include the processing of housing discrimination complaints and landlord/tenant counseling services. Sometimes a landlord/tenant issue has as its basis a housing discrimination concern.
- Efforts will be made to increase community awareness of the IFHMB services through postings on the City's web pages, publication of newspaper display ads, and Community Newsletter articles. “

The City also committed to a list of actions to increase access to education on fair housing laws and services (see page D-4).

Contributing Factors

- Lack of fair housing testing services²
- Lack of targeted outreach¹
- Lack of variety of outreach meeting times²
- Lack of transportation to services
- Lack of awareness of services¹

Evaluation and Prioritization

The analysis found that while there are fair housing services available to residents, one of the biggest factors that limit its fair housing goals is low awareness of these services. Given the limited funds available to the City, the City will focus on expanding awareness of the resources available to residents in the R/ECAP area. This includes targeted outreach by City staff as well as Citywide marketing through the City's web pages, publication of newspaper display ads, and Community Newsletter articles, and social media.

Since fair housing services are provided by the Inland Fair Housing and Mediation Board, the City will work with them to provide targeted outreach not only of fair housing services but other improvement programs (rehabilitation and facades) as well as to expand their scope of work to include consistent testing and vary the meeting locations.

B. Integration and Segregation and Access to Opportunities

Issue #2: Patterns of concentration as well as disparate access to opportunities/resources for communities in the center of the City.

Census tracts with a concentration low and moderate income household and children, or identified as R/ECAPs, and areas of high segregation and poverty were located in the center of the City, usually south of Villa Avenue and north of Ross Avenue (though sometimes extending all the way to Interstate Highway 8. These central census tracts, as well as census tracts east of the railroad tracts were also classified as areas of low resources. Census Tract 114, part of the area identified an area of high segregation and poverty, was formerly a segregated African American community. The population is mostly Hispanic now but remains an area with a high concentration of poverty. Though central census tracts are near jobs, their economic outcomes are low. This may be due to lower home values and lower adult education (which is compounded in the TCAC economic scores) and lower quality of education (TCAC education scores). HCV voucher users were mostly concentrated in the northern census tracts of the City, especially Census Tract 115 (a R/ECAP), but also at a lower intensity in the central tracts. Despite lower mean gross rents in these tracts, between 40 and 80 percent of renters experience cost burdens in these tracts.

Contributing Factors

- Lack of access to local jobs
- Lack of high quality schools
- Low home values/old housing stock¹
- Lack of private investment¹
- Lack of public investments in specific neighborhoods, including services or amenities¹
- Location and type of affordable housing- HCV use concentrated²
- The availability of affordable units in a range of sizes²
- Historically segregated community

Evaluation and Prioritization

Patterns of concentration and segregation need to be addressed with place-based strategies to improve the conditions to existing residents as well as mobility strategies that allow residents to live in areas with higher resources. The contributing factors have the highest impact on the conditions on areas of need are the lack of private and public investment and the low home values and old housing stock in areas of low resources and high poverty. The City's strategy is to continue to invest public funds for the improvement of areas with a concentration of poverty and segregation (Census Tract 115) and improve awareness of improvement programs for existing residents.

Alternatively, another contributing factor to fair housing is the lack of affordable housing in areas of high resources and the concentration of it in certain areas, causing a concentration of residents in need in areas with low resources. To combat this, the City will prioritize promoting affordable housing in higher resource areas through its sites inventory and inform tenants and landlords of the State's new Source of Income Protection (SB 329 and SB 222) to improve housing mobility.

C. Disproportionate Needs

Issue #3: Communities with disproportionate housing needs, like cost burdens, overcrowding, and substandard housing conditions, are concentrated in the census tracts in the center of the City.

The central census tracts, as well as census tracts east of the railroad tracts had disproportionate concentrations of cost-burdened renter households, overcrowding, and substandard housing. Sensitive communities at risk of displacement and older housing stock is also concentrated in these areas.

Contributing Factors

- Age of housing stock¹
- The availability of affordable units in a range of sizes¹

Evaluation and Prioritization

Both of the contributing factors have high priority as they both impact the housing choice of residents. As explained earlier, the areas with the disproportionate needs and concentration of poverty and segregation have some of the oldest housing as well as significant mobile home communities. Both of these factors tend to result in lower income areas. Census tract 115 also has a significant renter population. The City's strategy to meet these issues is to increase awareness through targeted outreach of the City's Home Rehabilitation program to homeowners and to require Affirmative Marketing Plan (AMP) a condition for approval for density bonuses to increase access to affordable units to lower income residents.