Analysis of Impediments to Fair Housing Choice

MAY 2024
BACKGROUND

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

As a recipient of federal funds, the City of El Centro is required by HUD to complete an Analysis of Impediments to Fair Housing Choice (AI). The AI studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AI proposes a series of strategies to overcome the identified fair housing issues.
COMMUNITY INVOLVEMENT

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in El Centro. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, focus groups, interviews, and a fair housing questionnaire.

Stakeholder Focus Groups and Interviews
The planning team also engaged with stakeholders representing a variety of perspectives through individual and small group interviews. Discussion topics included barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources.

A virtual focus group was held with the Imperial Valley Housing Authority (IVHA). The focus group began with a short presentation providing an overview of the Analysis of Impediments to Fair Housing Choice, and related grant programs. The presentation was followed by an interactive discussion of housing and community development needs and fair housing issues. Four staff members participated in this virtual focus group. A stakeholder interview was held via telephone with staff from Inland Fair Housing Mediation Board (IFHMB), which focused on fair housing issues in the area, complaint patterns, and community development needs.

Fair Housing Questionnaire
A fair housing questionnaire was also prepared and emailed to area developers, mortgage lenders, insurance agents, and real estate agents to assess their understanding of fair housing laws and access to training opportunities. A total of 7 stakeholders responded to the survey.
FAIR HOUSING ISSUES & CONTRIBUTING FACTORS

SEGREGATION AND INTEGRATION
Demographic trends in El Centro show that segregation between Black and white residents has decreased between 2000 and 2020. However, segregation has increased once again within the last ten years, growing from 32.96 to 44.63 which calculated a moderate segregation between Black and White residents. Overall, there has been an increase in segregation between white residents and all different racial/ethnic groups in El Centro, particularly within the last ten years.

El Centro’s racial and ethnic neighborhood composition has also changed between 2000 to 2022. The most noticeable change over the past 20 years is the growth of the Hispanic population, shown in orange. Black residents of El Centro have increased slightly and are mainly clustered in the central part of the city within the RECAPs tract and with a slight expansion in the surrounding tracts. Hispanic residents have expanded outwards from the central city in a less concentrated way. In 2000, white residents were mostly concentrated in the western portion of the city, and while they are still mostly living in this part of the city in 2022, their overall population has decreased significantly. Overall population growth and density has increased in a few areas in El Centro including the far northeast quadrant and the far southern portion of the city.

<table>
<thead>
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El Centro has a high concentration of Mexican-born residents throughout the city which may be due to its close proximity to Mexico’s border and surrounding predominantly Hispanic/Latino communities in southern California. Due to the high concentration of Mexican-born residents, there does not appear to be a concentration of residents born in other countries. The other most populous countries residents in El Centro are from include China, Korea, Guatemala, and El Salvador.
RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

As of the 2018-2022 American Community Survey, (1) census tract in El Centro fit the U.S. Department of Housing and Urban Development’s definition of racially or ethnically concentrated areas of poverty (R/ECAPs), defined as census tracts in which 1) more than half of the population is non-white and 2) 40% or more of the population is in poverty, or the poverty rate is greater than three times the average poverty rate in the area, whichever is lower. This tract is located in the north-central portion of the city.

Notably, the R/ECAPs tract exists in areas with higher-than-average concentrations of both Black and Hispanic residents, as well as areas with a high concentration of foreign-born residents as shown in Figure 2. This tract meets the definition of a Racially or Ethnically Concentrated Area of Poverty in that they have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.

Source: 2018-2022 ACS 5-Year Estimates, Tables S1701, B03002
ACCESS TO OPPORTUNITY

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes. In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs. Residents of El Centro face disparities in access to opportunity in the following areas:

**High-paying jobs:** residents of central and eastern El Centro have the lowest median household incomes, despite having the highest concentration of jobs. This indicates that jobs in these areas likely pay low wages.

**Transportation:** households in central El Centro are less likely to have access to a vehicle than households nearer to the City limits. Community members who provided feedback said that limited bus routes and hours greatly limit commuting opportunities for residents who do not have a car.

**Food access:** central El Centro contains many neighborhoods where 30% or more of all residents are considered low-income with low access to a supermarket. An estimated 17% of El Centro residents struggle with food insecurity.

**Healthcare:** the entirety of Imperial County has been designated as a medically underserved area since the 1990s, meaning that there are not enough primary care physicians in the area to properly care for all residents. In addition, residents in some portions of central El Centro are significantly less likely to have health insurance than residents in the rest of the City.

**Education:** educational achievement levels vary significantly within El Centro and generally correlate with labor market participation - unemployment rates are higher in areas with lower educational achievement. In addition, most elementary, middle, and high schools in El Centro have an unusually high number of economically disadvantaged students, and schools with more economically disadvantaged students typically have lower overall rates of student proficiency in math and English language arts.
DISABILITY AND ACCESS

16.3% of El Centro residents have at least one disability, a rate nearly 50% higher than the average for the state of California. Despite this, neither El Centro nor Imperial County has any Section 811 units, or subsidized units dedicated as supportive housing for people with disabilities. Residents who rely on Supplemental Security Income, or SSI payments, can only afford a rent of $314 per month without becoming cost burdened, but the average rent for a one-bedroom apartment in El Centro as of February 2024 was $1,231 per month. In combination with a higher-than-average disability rate among Housing Choice Voucher holders, this indicates an increased need for publicly supported housing for disabled residents in El Centro.

PUBLICLY SUPPORTED HOUSING

The City of El Centro contains 155 units of public housing, 145 units subsidized by project-based Section 8, and 795 Housing Choice Voucher holders. There are also approximately 503 Low Income Housing Tax Credits (LIHTC) units, 494 are identified as low-income units. Hispanic households account for nearly all the city’s publicly supported housing residents, comprising 97% of public housing households, 99% of project-based Section 8 households, and 94% of voucher holders.

During conversations with community members receiving public housing assistance and other stakeholders in the field, policies related to assistance qualification and subsidies were frequently cited frustrations, as increases in household income might disqualify a household from assistance but would still not enable them to afford market rate rents in the area. Additionally, residents who receive public housing assistance shared frustrations about the condition of their units, such as poor insulation, pest infestations, and plumbing issues.
FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES

Besides protections under the federal Fair Housing Act (FHA), residents of El Centro are protected from discriminatory housing practices by state level fair housing law. California’s Fair Employment and Housing Act (FEHA) has been deemed substantially equivalent to the rights, procedures, remedies, and enforcement affirmed via the FHA. Thus, complaints of housing discrimination are most often reported, investigated, mediated, and resolved through the work of either the California Civil Rights Department (formerly known as the Department of Fair Employment and Housing) as the state’s Fair Housing Assistance Program (FHAP) agency, or Inland Fair Housing Mediation Board (IFHMB), a private Fair Housing Initiatives Program (FHIP) grantee. Most fair housing complaints processed by the CRD or IFHMB in the recent five-year period involve disability as a basis of discrimination and accessible, quality, affordable housing as the most cited challenge.

The City of El Centro identified several impediments to affordable housing in its last 2019-2024 Analysis of Impediments to Fair Housing Choice, which included: a concentration of Section 8 residents in neighborhoods with high poverty rates; ill-informed property management practices; a lack of knowledge of fair housing laws among on-site property managers; and a lack of special provisions for accessible housing for persons with disabilities.
HOUSING NEEDS

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. **Cost burden**: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.

2. **Overcrowding**: A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.

3. **Lack of complete kitchen facilities**: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.

4. **Lack of complete plumbing facilities**: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

Lack of complete kitchen or plumbing facilities is considered a severe housing problem, as are housing costs exceeding 50% of monthly income and crowding of 1.5 or more people per room.

DISPROPORTIONATE HOUSING NEEDS

In El Centro, rates of housing problems vary significantly by race and ethnicity. In particular, Black residents are more than three times as likely to have at least one housing problem as white residents, and Hispanic residents are nearly twice as likely to have at least one housing problem as white residents. Black residents experience severe housing cost burden at a rate more than five times that of white residents, while Hispanic residents experience it at nearly triple the rate and Asian/Pacific Islander residents at nearly double the rate of white residents.

Rates of housing problems also vary by household type. Non-family households are least likely to have a housing problem, while large family households of 5 or more people are most likely to have at least one housing problem. However, large family households are least likely out of all household types to be severely cost burdened, while small family households are most likely.

Overall, 40% of households in El Centro have at least one housing problem, and 13% of all households are severely cost burdened.
FAIR HOUSING GOALS AND ACTIONS

The Analysis of Impediments concludes by identifying six barriers to fair housing choice in El Centro and creating corresponding goals and strategies designed to alleviate each barrier. These include:

**Impediment #1: Aging housing stock in need of rehab and repair**

Data shows that El Centro’s housing stock is aged overall – less than 20% of the City’s housing is under 20 years old, while 65% is more than 40 years old. A city with aged housing stock typically has a greater need for rehabilitation and repair programs and funding than a city with newer housing stock. This contributes to a high rate of housing problems in the City - 40% of El Centro households experience one or more HUD-defined housing problem, and race and ethnicity greatly impact a household’s likelihood of experiencing one or more problems. Nearly 90% of Black households in El Centro experience at least one housing problem, in comparison to less than one quarter of white households. Nearly half of all Hispanic households experience one or more housing problems. When negative factors in housing disproportionately impact protected classes, such as racial or ethnic groups, this constitutes a barrier or impediment to fair housing choice.

Suggested strategies to overcome this impediment include:

- Gather data and produce a report on factors impacting the lack of new housing built in El Centro in the past twenty years and use it to create a plan to encourage the development of new housing within the jurisdiction
- Implement or expand any existing rehab and repair programs using CDBG funding
- Create or expand rehab and repair programs targeting traditionally Black and Hispanic communities, as well as neighborhoods with low median household incomes

**Impediment #2: Disparities in access to community resources and services**

In many cities, a person’s location within the city impacts the resources they are able to access. Neighborhoods without equal access to resources may present a barrier or impediment to fair housing choice when residents of a city are limited to such neighborhoods by financial or other circumstances. In El Centro, several census tracts have limited access to resources when compared to other areas of the City. This includes disparities in job, transportation, food, and healthcare access, educational attainment levels, and wages.

In combination, these factors have the potential to severely limit a person’s housing choice and therefore their access to resources. A person living in a tract with lower rates of health insurance is less likely to have a vehicle, meaning that they may be forced to remain in the same neighborhood in order to be within walking distance of a low-wage job, and may be unable to access higher-wage jobs with better benefits, such as health insurance, due to lack of transportation. As many of these access issues overlap in El Centro’s only R/ECAP tract, which is primarily occupied by Black and Hispanic residents, it is clear that resource access issues within the City disproportionately impact protected class groups and therefore constitute and impediment to fair housing choice.
Suggested strategies to overcome this impediment include:
- Create or expand job training and employment assistance programs in areas of the City with low median household income
- Create or expand upward mobility and financial education and assistance programs in areas of the City with low median household incomes
- Expand bus routes and operational hours in areas of the City with low vehicle access rates
- Investigate the potential to expand subsidized rideshare programs for non-disabled residents in areas of the City with low vehicle access rates
- Ensure that bus routes throughout the city provide easy access to supermarkets and that operational hours allow residents to grocery shop after work or on the weekends
- Produce a report on steps the City could take to encourage the development of new supermarkets in low-access areas
- Create educational campaigns and workshops to help uninsured residents access and apply for Medicaid, Medicare, or other public health insurance
- Create educational campaigns to educate workers on legally required job benefits such as health insurance and resources or assistance for instances in which employers are not providing required benefits

Impediment #3: Low Wages Impede Access to Opportunities, Resources, and Restrict Housing Choice for Low/Mod Income Households and Protected Classes
Disparities in labor market engagement exist by geography, race, and ethnicity in El Centro. Unemployment is highest among Native American residents (over 50% as of the 2018-2022 ACS estimates), and the share of residents aged 25 and over with a bachelor’s degree or higher is lowest among Black residents (less than 1.1%). Residents and stakeholders noted that in addition to income, residents’ housing choices are shaped by a variety of factors, including access to grocery stores, healthcare, and other needed resources; access to public transportation; and availability of public infrastructure such as sidewalks.

In particular, there is a high need for investment in public schools throughout all of El Centro. The majority of the public schools’ students are over 90% minorities with more than 60% coming from economically disadvantaged backgrounds. Based on the percentage of overall performance levels, the majority of schools have more than a quarter of students who have not met their performance standards. Funding for programs that provide collaborative, integrated support for students can help increase access to proficient schools for residents who may lack the opportunity to move to higher-performing schools or zones. The City of El Centro and Imperial County leadership must collaborate on coordinating community school services and distribution of resources and support throughout the district.

Suggested strategies to overcome this impediment include:
- Work with community partners to support resident and employer participation in job search, placement, and training programs. In particular, expand paid job training programs.
- Invest/expand job training and placement initiatives for individuals with LEP to increase their self-sufficiency and housing stability.
Impediment #4: Limited Supply of Affordable Housing for Low/Mod Income Households

A general lack of affordable housing options available to low- and moderate-income households was one of the most frequently cited issues identified in our conversations with El Centro community stakeholders. This shortage has become increasingly dire over the past few years as housing costs in the area have drastically increased and wages have remained comparatively stagnant. Additionally, there is limited public housing assistance, and existing resources are often coupled with waitlist periods of 1 year or more, source of income discrimination by area landlords, and housing quality issues. There is a great need for increased numbers of affordable multifamily units and assistance for low-income homebuyers.

An estimated 12.8% of households in El Centro are severely cost-burdened, spending over 50% of income on housing. (See Table 12: Demographics of Households with Severe Housing Cost Burdens). Black households are the most impacted by severe cost burdens (27.3%, or 120 of 440 Black households). Hispanic households are the second group most impacted by severe cost burdens with a rate of 15.9% (1,510 of 9,515 Hispanic households). Additionally, 15.4% of small-family households and 10.6% of non-family households are severely cost burdened in El Centro.

Suggested strategies to overcome this impediment include:

- Continue to review the Annual Qualified Allocation Plans issued by the California Tax Credit Allocation Committee under the Low Income Housing Tax Credit (LIHTC) program to identify local government policies or actions that may positively impact the competitiveness of developers’ applications
- Consider and adopt zoning code amendments that could increase possibilities for development of affordable housing
- Convene a focus group of local affordable housing developers to identify challenges to working in the region, and develop strategies to address these barriers

Impediment #5: Limited Housing Options for Persons With Disabilities

According to 2018-2022 ACS 5-Year Estimates, approximately 16.3% of the population in El Centro has at least one disability. This rate is higher than the overall disability rate in California (11.0%) and Imperial County (14.2%), suggesting that El Centro has a particular need for accessible housing suitable for persons with disabilities, who often have specialized housing needs. In addition, as persons with disabilities often live on limited incomes, such as standard Supplemental Security Income (SSI) payments, affordability is a key concern. This issue is further exacerbated by El Centro’s high housing costs, as those living on fixed incomes—often receiving less than $1,000 per month, according to average SSI estimates—are unlikely to be able to afford market-rate housing in the city, where 1-bedroom units rent for approximately $1,500 a month, according to ACS estimates.

As such, publicly supported housing plays a key role in providing persons with disabilities with affordable, accessible housing options. However, a review of HUD’s most recent A Picture of Subsidized Housing (APSH) data reveals that there are only two (2) Section 202 unit for seniors (Boatwright Homes and Cedar Homes) and no Section 811 units for persons with disabilities within El Centro.
Suggested strategies to overcome this impediment include:

- Partner with the Imperial Valley Housing Authority and the California Housing Finance Agency to explore potential funding opportunities for affordable, accessible housing that meets the needs of persons with disabilities, such as the Section 811 program
- Convene a focus group comprised of local disability advocacy and supportive service providers to gain a deeper understanding of the unique challenges and issues that residents with disabilities face in El Centro’s housing landscape

**Impediment #6: Need for Continued and Expanded Fair Housing Activities**

Knowledge of fair housing rights and resources is generally good in the City of El Centro. Stakeholders noted that over the past decade, local knowledge about fair housing has improved dramatically, and residents who did not know how to file a fair housing complaint were referred to the appropriate organization. According to our stakeholder fair housing questionnaire results, professionals in the real estate, mortgage, and development industries seem to have a strong understanding of fair housing protections. However, conversations with stakeholders also revealed that discrimination in housing still occurs in the area. Barriers to housing often include factors such as poor credit history, 3x or more minimum income requirements, and source of income discrimination, which is prohibited under California law (FEHA). These results indicate that while ongoing education efforts within the community have been successful, there is a continuing need to provide fair housing education and resources. The diversity of the city’s population suggests that this fair housing education should be targeted to communities of color and people with limited English proficiency.

Strengthening of connections between the City of El Centro and its fair housing service providers (like IFHMB) with local organizations that serve groups known to be vulnerable to housing discrimination, such as El Centro Hispano.

**Suggested strategies to overcome this impediment include:**

- Continue to offer fair housing education activities, with a focus on expanding the pool of partners the City and IFHMB works with (ex: LEP communities/organizations, disability advocacy and supportive service providers, schools, etc.) to ensure meaningful connections are established with vulnerable populations
- Collaborate with property managers and landlords to ensure that they have an understanding of property management practices that affirmatively further fair housing
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INTRODUCTION

Fair Housing Planning

Equal access to housing choice is crucial to America’s commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD’s housing and community development programs. The AFFH requirements are derived from Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities, such as the City of El Centro, that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an “Analysis of Impediments to Fair Housing Choice” (AI). In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities promote fair housing choices for all persons, including classes protected under the Fair Housing Act, and provide opportunities for racially and ethnically inclusive patterns of housing occupancy, identify structural and systemic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

• Analyzing and eliminating housing discrimination within the jurisdiction;
• Promoting fair housing choice for all persons;
• Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
• Promoting housing that is physically accessible to all persons to include those persons with disabilities; and
• Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD’s goal is to expand mobility and widen a person’s freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlined procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD’s final rule, grantees must take actions to:

• Address disparities in housing need;
• Replace segregated living patterns with integrated and balanced living patterns;
• Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
• Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees and housing authorities affirmatively further fair housing, HUD provided publicly-available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD’s final rule mandated that most grantees begin submitting to HUD an assessment developed using this tool in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. HUD’s data and maps remain available for grantees to use in preparing their AIs. For further information, please see HUD’s notices appended to this report.
Mosaic Community Planning partnered with the City of El Centro to develop this Analysis of Impediments to Fair Housing Choice. This AI follows HUD’s Fair Housing Planning Guide but also incorporates elements of HUD’s assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

Definitions

Affirmatively Further Fair Housing: In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”

Affordable: Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

HUD defines as “affordable” housing that costs no more than 30% of a household’s total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners’ insurance, and any homeowners’ association fees.

Fair Housing Choice: This Analysis of Impediments to Fair Housing Choice uses the following definition of “Fair Housing Choice”:

The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Impediments to Fair Housing Choice: As adapted from the HUD Fair Housing Planning Guide, impediments to fair housing choice are understood to include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.

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Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

**Protected Classes:** The following definition of federally protected classes is used in this document:

*Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.*

**Data Sources**

**Decennial Census Data:** Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- **2010 and 2000 Census Summary File 1 (SF 1):** This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

- **2000 Census Summary File 3 (SF 3):** Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

- **2010 and 2020 Redistricting Data:** The Census Bureau released redistricting data for all states on August 12, 2021. The dataset provides demographic characteristics of the nation by state, county, city, all the way down to the census block level, including race and ethnicity; population 18 years and over; occupied and vacant housing units; and people living in group quarters like nursing homes, prisons, military barracks and college dorms.
American Community Survey (ACS): The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census’s SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- **ACS Multi-Year Estimates:** More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 1-year estimates. The 2012-2016 ACS 5-year estimates are used most often in this assessment.

- **HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T):** HUD’s AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD’s latest data and maps, AFFHT0004, which was released in November 2017. HUD’s source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD’s Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD’s Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report or available online at: [https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf](https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf)
COMMUNITY PARTICIPATION PROCESS

Community Engagement Overview

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in El Centro. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including public meetings, focus groups, interviews, and a community-wide survey.

Public Meeting

1 council meeting open to the public was held to inform the El Centro City Council and the public about the Analysis of Impediments to Fair Housing Choice. The meeting consisted of one brief presentation providing an overview of the AI, its research findings, and its identified impediments and recommendations followed by the opportunity for any questions or comments. No questions or comments were received. The council meeting was held both virtually and in-person, and the presentation was done virtually. At the meeting, the El Centro City Council passed Resolution No. 24-18 (see APPENDIX I: Citizen Participation Record, which authorized the submission of the 2024-2028 Analysis of Impediments to Fair Housing Choice to the U.S. Department of Housing and Urban Development and to implement the recommend actions to address potential impediments to fair housing in the City of El Centro. Meeting date, time, and location are shown below:

<table>
<thead>
<tr>
<th>Public Meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date:</strong> April 2nd, 2024</td>
</tr>
<tr>
<td><strong>Time:</strong> 6:00pm PT</td>
</tr>
<tr>
<td><strong>Address:</strong> City Hall, 1275 Main Street, El Centro, CA 92243</td>
</tr>
<tr>
<td><strong>Join Zoom Meeting:</strong> <a href="https://us06web.zoom.us/j/4180375132?pwd=Rmo5UjZ1cWdyV1VoWUhSZWp6R0tVZz09&amp;omn=87332677880">https://us06web.zoom.us/j/4180375132?pwd=Rmo5UjZ1cWdyV1VoWUhSZWp6R0tVZz09&amp;omn=87332677880</a></td>
</tr>
<tr>
<td><strong>Optional dial-in number:</strong> 1 (669) 900-6833</td>
</tr>
<tr>
<td><strong>Meeting ID:</strong> 418 037 5132</td>
</tr>
</tbody>
</table>
Stakeholder Focus Groups and Interviews

The planning team also engaged with stakeholders representing a variety of perspectives through individual and small group interviews. Discussion topics included barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources.

A virtual focus group was held with the Imperial Valley Housing Authority (IVHA). The focus group began with a short presentation providing an overview of the Analysis of Impediments to Fair Housing Choice, and related grant programs. The presentation was followed by an interactive discussion of housing and community development needs and fair housing issues. Four staff members participated in this virtual focus group. A stakeholder interview was held via telephone with staff from Inland Fair Housing Mediation Board (IFHMB), which focused on fair housing issues in the area, complaint patterns, and community development needs. A fair housing questionnaire was also prepared and emailed to area developers, mortgage lenders, insurance agents, and real estate agents to assess their understanding of fair housing laws and access to training opportunities.

Overall, one or more representatives from 6 organizations and agencies participated in a stakeholder interview, focus group, questionnaire, or written request for information. Organizations and agencies from which someone participated in the development of this AI include:

- Inland Fair Housing Mediation Board (IFHMB)
- Imperial Valley Housing Authority (IVHA)
- Imperial Valley Transit (IVT)
- Prince & Associates Realtors
- Wallick & Volk Mortgage
- Golden Group Real Estate Services
COMMUNITY ENGAGEMENT RESULTS

For the community participation process, the consulting team developed a standard question set for use in public meetings, focus groups, and interviews. Listed below are the summarized comments from interview participants and focus group attendees, as well as a summary of survey results. All input was considered in the development of this AI, and all comments or surveys were accepted. Note that these comments do not necessarily reflect the views of the City of El Centro or Mosaic Community Planning.

Focus Group

1. What types of housing needs are greatest in the community (e.g. workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?

- Overall affordable rental housing. Voucher holders and non-holders both used to easily be able to find housing, but the market is now super tight, and landlords are very picky. Rents have close to doubled for all bedroom sizes in the past two years.
- First time homebuyers’ assistance. Some residents are paying more in rent than they would for a mortgage, but they don’t know where to start the homebuying process and need general assistance in the process and also with down payments, etc.
- Financial literacy programs and consolidated information on assistance programs would help. Many program participants are very intimidated by making the transition to home ownership, especially by the lack of safety nets when leaving housing authority programs.
- Also concerned by new housing being built that is targeted to farm laborers (USDA developments) – too many developments are targeting this demographic and the demand is inconsistent and seasonal.

2. What parts of the city are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas? Are you aware of any housing discrimination?
• Area in a two mile radius from Southwest High School is very desirable due to proximity to the school and quality of housing

• Credit score is a big barrier for many people looking to move to a more desirable neighborhood, even for people with complete rental subsidies.

3. Are there actions the housing authority could take or is taking to overcome these barriers?

• Imperial Valley Housing Authority (IVHA) participants are given an orientation packet that talks about housing discrimination and fair housing rights and resources – it’s important that participants are educated on what protected classes are and what counts as discrimination.

• IVHA is addressing lack of supply by increasing percentage of units in new developments that are designated for project based vouchers.

• There are currently two new developments in progress behind Costco on N Imperial Ave that are working with IVHA to bring in low-income units.

4. What funding sources or programs have been most successful in the past?

• There is a development that was allowed to lapse in its USDA designation to open it up to more people than just farm laborers while still prioritizing keeping existing residents in place. Maintaining reasonable rent increases is important in the housing authority being able to maintain properties.

• IVHA received special funding for 156 emergency housing vouchers for people exiting shelters and for their related needs like furniture, deposits, utilities, etc. There is also special targeted funding for people who are under 62 and disabled and for veteran vouchers.

5. What are the biggest challenges affordable housing providers face?

• Many contractors in the area are priced too high for subsidized project bids – it’s hard to find affordable contractors, especially since the pandemic

6. Is El Centro experiencing barriers related to poor credit history, past evictions, income requirements, or income discrimination?

• The discrimination isn’t blatant but it’s there, especially poor credit and past evictions. There is a sense that voucher holders are discriminated against especially with the tight housing market, but there is no concrete evidence or complaints.

• Source of income discrimination is against the law in California but it still happens

• Seeing more discrimination about not meeting 3x income than about voucher holders – median income is only 67.5k and that hasn’t kept up with recent rent
doubling. Clients can also be discriminated against for receiving welfare or disability – basically any payments that aren’t from wages

7. How are landlords encouraged to participate in the HCV program? Are there common issues that arise in HCV participation?

- The pandemic eviction moratorium really helped tenants, and landlords of voucher holders kept receiving payments when other landlords didn’t, which may have helped landlords view the HCV program more favorably.

- There is a $2,000 one-time cash incentive for landlords who sign new Section 8 leases, and landlords also like knowing they are getting the emergency housing voucher deposits. Most participating landlords are repeat customers so the HA really tries to maintain good will and be as flexible as possible with landlords. Most new landlords come to the housing authority through word of mouth. Landlords also like that the HA uses direct deposit because they can count on receiving rent each month.

- IVHA just started sending out thank you letters to landlords with info on new participation opportunities like Veteran Affairs Supportive Housing (VASH) vouchers.

8. How well known are fair housing resources and how could they be publicized?

- Over the past 20 years I’ve noticed that participants are better informed now than they used to be, maybe because of social media.

- The housing authority provides contact information for fair housing assistance to clients.

- The Imperial Valley Continuum of Care (CoC) Council meetings help with collaboration and coordination between agencies. CoC also has a Mercy Housing hotline number that can help with fair housing issues.

**Stakeholder Interview**

1. What types of housing needs are greatest in the community (ex. affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)?

- Overall, increased affordable housing opportunities
- More housing accessible for persons with disabilities
- Newer housing units should be built in areas of opportunity
- Need for homeless services
2. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in your community?
   - No, we need better infrastructure – improved drainage, roads, sidewalks, etc.

3. Are people aware of their fair housing rights?
   - Still a need for more awareness, we provide education and outreach on fair housing issues, but it’s one of those things that we need continual outreach… they affect people at different times
   - Outreach needed for both tenants and housing providers
   - Help people enforce their existing rights – who can help them if they did need to put together a housing complaint - referrals

4. Do you have collaborative partnerships with housing providers in the region?
   - We have a federal grant for fair housing, it’s not just El Centro funds
   - We reach out to different nonprofits
   - California Legal Services
   - Education is provided in English and Spanish
   - We also provide language assistance in other languages (partnership with language line)

5. Is there anything we haven’t discussed that you feel is important to our research?
   - In the last year, there’s definitely an increase for eviction-related help. Looks like people are having a harder time staying housed
   - Fair housing has been steady in their complaints – disability related discrimination definitely the most common one
Fair Housing Questionnaire

1. What is your primary role in the housing industry?

- Affordable Housing Development: 1
- Construction/Development
- Insurance
- Lending/Mortgage Industry: 3
- Local Government: 1
- Property Management
- Real Estate Sales/Brokerage: 2
- Service Provision
- Other

2. What is the name of your organization or agency?

A summary of participating organizations and agencies can be found in the prior section, Community Participation Process.
3. Does your organization or agency service a specific geographical area or areas?

- State of California
- Imperial County
- City of El Centro

4. How familiar are you with fair housing laws?
If you selected “very familiar” or “somewhat familiar,” please describe how you became aware

- Part of continuing education
- Annual training required for license renewal
- Requirement of all operations to abide by all current fair housing laws

5. Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law.

Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?

6. If you answered “yes” above, have you participated in fair housing activities or training?
7. HUD defines barriers to fair housing choice as “actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.”

In the question below, please tell us if you are aware of any barriers related to fair housing choice in each private sector area. If you can think of practices or barriers, please describe them in the box provided. Please note, examples provided represent only one of many possible scenarios.

Do any of these issues create barriers to fair housing in El Centro?

8. Does your institution have any policies or procedures in place that address the barriers to fair housing indicated above?

If yes, please explain the policies and procedures.

- Continuing education
- Offer loans tailored for people of all means – protected classes have nothing to do with qualifying criteria
- Have posted Fair Housing Guidelines in waiting room
• Creating barriers to fair housing causes lenders to lose licensing

9. Use this space to provide any additional info that you think would be helpful for our plan.

N/A
SOCIOECONOMIC &
PUBLIC INVESTMENT PATTERNS

The El Centro entitlement jurisdiction is home to an estimated 44,184 residents according to the 2018-2022 Five-Year American Community Survey (ACS). The City of El Centro’s population accounts for 24.6% of residents in Imperial County (a total population of 179,578), which includes seven cities and eight unincorporated communities. El Centro’s population grew slightly between 2000 and 2010 (9.9%), and recent estimates show growth was slower in recent years (a 6.3% growth rate between 2010 and 2022 estimates).

Demographic Profile

Race / Ethnicity

El Centro’s racial and ethnic demographics have remained consistent in the last 20 years, as depicted in TABLE 1 and Table 2. In the past 20 years, El Centro has been comprised of a predominantly Hispanic/Latino population, growing from 73.6% to 81.4% of the total population between 2000 and 2010. As of 2022, Hispanic/Latino residents account for 88.2% of the total population, a 19.8% increase since 2000.

White residents hold the second largest share of the total population in the city; however, the white population has experienced a significant decline during this time, from 18.9% of the total population in 2000 to 7.1% in 2022, a -62.4% decline. The Asian/Pacific Islander population has also seen a loss of over half, declining from 3.6% in 2000 to 1.3% in 2022. The Native American share of the total population has decreased from 0.5% in 2000 to 0.1% in 2022.

The Black population is the only other group besides Hispanic/Latino residents that have increased since 2000, growing from 2.9% of the population in 2000 to 3.1% in 2022.

Potential fair housing considerations related to rapidly shifting racial and ethnic demographics include the following:

- Increased potential for realtor or landlord discrimination due to race or ethnicity
- Increased potential for lender discrimination due to race or ethnicity
- Increased potential for neighborhood pushback towards new residents or developments due to race or ethnicity
- Increased need for consideration of traditional household structures of non-white households in determination of size and style of future housing unit developments
(extended family members living as one household is more common in many non-white cultures than in white American culture).

Disability
According to 2022 ACS data, approximately 16.2% of the population living in the city of El Centro have a disability, slightly greater than the population share in Imperial County (13.6%). The population with disabilities in the city and the county has similar distributions by disability type. The most common disability type in El Centro is difficulty with ambulatory movement. People experiencing ambulatory difficulties comprise 51.4% of the city’s total population with a disability. People with cognitive difficulties comprise of the second largest disability type (44.9%). People with disabilities that may require extensive assistance, including independent living or self-care difficulties, make up 23.3% and 21.7% of El Centro’s population, respectively. The population of people with hearing and vision difficulties make up 25.6% and 19.7% of the city’s population, respectively.

The population share of residents with disabilities in Imperial County (13.6%) is slightly lower compared to the city of El Centro. The distribution by disability types in Imperial County follow general patterns found in the city but are also slightly lower in shares of the population, except for people with ambulatory, self-care, and independent living difficulties which account for 56.4%, 27.7%, and 37.8% of the total population with a disability, respectively.

Potential fair housing considerations related to an increase in the population with a disability include:

- Increased potential for realtor or landlord discrimination due to disability status
- Increased potential for neighborhood pushback towards residents or developments due to disability status
- Increased need for accessible housing programs and fair housing materials
- Increased need for reasonable accommodations
- Increased need for housing suitable for live-in caregivers
- Increased need for nearby transit options

National Origin
The share of foreign-born residents in El Centro has slightly declined (-14.5%) between 2000 to 2022. As of 2022, foreign-born residents still account for more than a quarter of the population (29.0%). In the larger El Centro Region, the foreign-born population has grown by 3.4% and comprises over 33.3% of the total population.
Top countries of origin for El Centro’s foreign-born population are Mexico, Korea, Philippines, Canada, and India. The population originating from Mexico is the largest, comprising 27.3% of city residents and 94.1% of foreign-born residents. Residents from all other countries each account for less than 1% of the city's total population. Foreign-born residents from Korea, Philippines, Canada, and India comprise 0.9%, 0.7%, 0.5%, and 0.5% of the total foreign-born population, respectively.

Foreign-born residents account for 30.5% of the current population in Imperial County. The top countries of origin for Imperial County’s foreign-born population are Mexico, El Salvador, Korea, China, and Guatemala. Residents originating from Mexico account for 28.5% of the total population and 93.2% of the foreign-born population, a similar proportion compared to El Centro. Residents originating from El Salvador, Korea, China, and Guatemala make up 0.9%, 0.8%, 0.5%, and 0.5% of the foreign-born population, respectively, closely aligning with El Centro’s rates.

Potential fair housing considerations related to changing national origin demographics include the following:

- Increased potential for realtor or landlord discrimination due to national origin
- Increased potential for lender discrimination due to national origin
- Increased potential for neighborhood pushback towards new residents or developments due to national origin
- Increased need for consideration of traditional household structures of foreign households in determination of size and style of future housing unit developments (extended family members living as one household is more common in many foreign cultures than in American culture)
- Increased need for housing and fair housing materials available in non-English languages

**Limited English Proficiency (LEP)**

The demographics of the population with limited English proficiency (LEP) typically resembles the patterns of the foreign-born population in most communities. The population trends of the LEP population in El Centro follow a similar trajectory as the foreign-born population, however, LEP populations in the larger El Centro Region deviate slightly from these patterns wherein its LEP population has decreased while its foreign-born population has increased slightly since 2000. Both the foreign-born and LEP populations in El Centro have decreased slightly since 2000.

The LEP population in the city of El Centro accounts for 27.7% of the current population after declining by -10.1% since 2000. However, the decline rate has been slower within the past ten years, with a loss of -0.4%. The majority (81.1%) of the LEP population speak
Spanish and the second and third most common languages spoken among the LEP population are Tagalog and Chinese, although both account for only 0.7% of the LEP population.

The change in the LEP population in the larger El Centro region slightly varied from the growth patterns of the foreign-born population because there was a slight decline in the LEP population between 2000 and 2010. The LEP population has decreased by -3.2 since 2000 and comprises 30.7% of the current population. The varying growth and decline rates could indicate disproportionate change in the number of foreign-born residents from countries where English is the primary language or commonly used and/or improved English language skills for existing foreign-born residents. Compared to the LEP population in the city of El Centro, a lower percentage of LEP residents (77.3%) speak Spanish. The second most common language among the LEP population is Korean and is spoken by 0.4% of the population. Other/unspecified languages, Chinese, and Arabic are the next most common languages and spoken by 0.4%, 0.3%, and 0.3% of the LEP population, respectively.

Potential fair housing considerations related to an increase in population with limited English proficiency include the following:

- Increased potential for realtor or landlord discrimination due to limited English proficiency
- Increased potential for lender discrimination due to limited English proficiency
- Increased potential for neighborhood pushback towards new residents or developments due to limited English proficiency
- Increased need for housing and fair housing materials available in non-English languages

Age

Age distribution in El Centro and Imperial County loosely resemble each other’s population shares. People between the ages of 18 and 64 comprise a slightly larger percentage in the county (58.4%) compared to the city (56.0%). From 2000 to 2010, the population between 18 and 64 in the city of El Centro grew at a rate of 6.4% and expanded in proportion by 3.6 percentage points. The proportion of residents under the age of 18 (30.0%) is more than double the share of residents that are 65 and over (13.9%) in the city. The population under 18 declined by 13.0%. since 2000 while the 65 and above population increased by 44.8%.

The majority of Imperial County’s population (58.4%) is between the ages of 18 and 64, however, the population share of residents under the age of 18 (28.4%) is slightly smaller than in El Centro. The population share of residents aged 65 and over at 13.2 is similar to that of the city’s. People aged 18 and over in the region experienced growth since
2000, however, those under 18 decreased in population share with a 3% change in percentage points. However, there did not appear to be a decline of people aged 18 and under between 2010 and 2022.

Data shows that the population of El Centro and its overall region is trending older. As the population of El Centro ages and families have fewer children, it is likely that the city will require a greater capacity for housing individuals with disabilities and in need of caregivers in the future.

While families with children constitute a protected class, age itself and advanced age are not federally protected classes. However, Imperial County’s Human Rights Ordinance lists age as a protected class in regard to fair housing, and the County’s aging population and its continued popularity among retirees present the following fair housing considerations:

- Increased need for disability accessible housing, as disability rates increase with age
- Increased need for housing suitable for live-in caregivers
- Increased need for smaller housing units suitable for independent retirees
- Increased need for nearby transit options, as age-related disability may prevent driving

**Sex**

The population of El Centro is 50.1% male and 49.9% female, similar to the population of Imperial County. This is a slight decrease from 2000, when the population was 50.7% female and 49.3% male. Within the past 20 years, there has been a small decline in female residents compared to male residents which have increased by 1.6% since 2000. However, within the overall region, both male and female populations have slightly decreased in the past 20 years. Sex demographics within El Centro are unlikely to impact fair housing considerations when decoupled from age or disability, as covered above.

**Family Type**

The City of El Centro has experienced a slight decline in the number of families having children over the past 20 years, from 61.6% of all households in 2000 to 58.6% of all households in 2020. The greater El Centro region experienced a larger decline, with households with children dropping from 58.5% to 52.9% of the total population since 2000. Of families with children roughly 26.1% are headed by a married couple, 12.7% by a single mother, and 3.4% by a single father. The remainder of households with children are either unmarried couples with children or unspecified relationships. Families with children may experience fair housing concerns related to:
• Housing unit size
• Neighborhood safety
• Walkability
• Proximity to green space
• Proximity to desirable school districts
## Table 1. Demographic Overview

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>El Centro</th>
<th>Imperial County</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>Race / Ethnicity</strong></td>
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</tr>
<tr>
<td>Non-Hispanic</td>
<td>5,210</td>
<td>11.8%</td>
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<tr>
<td>White</td>
<td>3,140</td>
<td>7.1%</td>
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<tr>
<td>Black</td>
<td>1,369</td>
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<td>Asian or Pacific Islander</td>
<td>577</td>
<td>1.3%</td>
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<tr>
<td>Native American</td>
<td>26</td>
<td>0.1%</td>
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<tr>
<td>Two or More Races</td>
<td>98</td>
<td>0.2%</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>38,974</td>
<td>88.2%</td>
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<tr>
<td><strong>Total Population</strong></td>
<td>44,184</td>
<td>100.0%</td>
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<td><strong>National Origin</strong></td>
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<tr>
<td>#1 Country of Origin</td>
<td>Mexico</td>
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<td>#2 Country of Origin</td>
<td>Korea</td>
<td>109</td>
</tr>
<tr>
<td>#3 Country of Origin</td>
<td>Philippines</td>
<td>84</td>
</tr>
<tr>
<td>#4 Country of Origin</td>
<td>Canada</td>
<td>67</td>
</tr>
<tr>
<td>#5 Country of Origin</td>
<td>India</td>
<td>65</td>
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<tr>
<td><strong>Total Foreign-Born Population</strong></td>
<td>12,818</td>
<td>29.0%</td>
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<td><strong>Limited English Proficiency (LEP) Language</strong></td>
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<tr>
<td>#1 LEP Language</td>
<td>Spanish</td>
<td>9,915</td>
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<tr>
<td>#2 LEP Language</td>
<td>Tagalog (incl. Filipino)</td>
<td>46</td>
</tr>
<tr>
<td>#3 LEP Language</td>
<td>Chinese (incl. Mandarin, Cantonese)</td>
<td>44</td>
</tr>
<tr>
<td>#4 LEP Language</td>
<td>Korean</td>
<td>40</td>
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<td>-----------------</td>
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<tr>
<td>#5 LEP Language</td>
<td>Other and unspecified languages</td>
<td>36</td>
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| TOTAL LEP POPULATION | 12,225 | 27.7% | 47,024 | 26.2% |

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<tr>
<th>DISABILITY TYPE</th>
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<tr>
<td>Hearing Difficulty</td>
<td>1,833</td>
<td>25.6%</td>
<td>5,635</td>
<td>23.1%</td>
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<tr>
<td>Vision Difficulty</td>
<td>1,409</td>
<td>19.7%</td>
<td>4,206</td>
<td>17.3%</td>
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<tr>
<td>Cognitive Difficulty</td>
<td>3,217</td>
<td>44.9%</td>
<td>9,929</td>
<td>40.8%</td>
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<tr>
<td>Ambulatory Difficulty</td>
<td>3,678</td>
<td>51.4%</td>
<td>13,744</td>
<td>56.4%</td>
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<tr>
<td>Self-Care Difficulty</td>
<td>1,557</td>
<td>21.7%</td>
<td>6,739</td>
<td>27.7%</td>
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<tr>
<td>Independent Living Difficulty</td>
<td>1,668</td>
<td>23.3%</td>
<td>9,198</td>
<td>37.8%</td>
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</tbody>
</table>

| TOTAL POPULATION WITH A DISABILITY | 7,159 | 16.2% | 24,352 | 13.6% |

<table>
<thead>
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<th>SEX</th>
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<tbody>
<tr>
<td>Male</td>
<td>22,117</td>
<td>50.1%</td>
<td>92,430</td>
<td>51.5%</td>
</tr>
<tr>
<td>Female</td>
<td>22,067</td>
<td>49.9%</td>
<td>87,148</td>
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<th>AGE</th>
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<tbody>
<tr>
<td>Under 18</td>
<td>13,276</td>
<td>30.0%</td>
<td>51,049</td>
<td>28.4%</td>
</tr>
<tr>
<td>18 to 64</td>
<td>24,749</td>
<td>56.0%</td>
<td>104,858</td>
<td>58.4%</td>
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<tr>
<td>65+</td>
<td>6,159</td>
<td>13.9%</td>
<td>23,671</td>
<td>13.2%</td>
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</thead>
<tbody>
<tr>
<td>Family Households</td>
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<td></td>
</tr>
<tr>
<td>Married Couple, with one or more people under 18</td>
<td>3,196</td>
<td>26.1%</td>
<td>11,128</td>
<td>23.7%</td>
</tr>
<tr>
<td>Female Householder, with one or more people under 18</td>
<td>1,548</td>
<td>12.7%</td>
<td>5,733</td>
<td>12.2%</td>
</tr>
<tr>
<td></td>
<td>Number</td>
<td>Percentage</td>
<td>Total</td>
<td>Percentage</td>
</tr>
<tr>
<td>-------------------------</td>
<td>--------</td>
<td>------------</td>
<td>---------</td>
<td>------------</td>
</tr>
<tr>
<td>Male Householder, with one or more people under 18</td>
<td>418</td>
<td>3.4%</td>
<td>1,745</td>
<td>3.7%</td>
</tr>
<tr>
<td><strong>TOTAL HOUSEHOLDS WITH ONE OR MORE PEOPLE UNDER 18</strong></td>
<td>7,159</td>
<td>58.6%</td>
<td>24,352</td>
<td>51.8%</td>
</tr>
<tr>
<td>Married Couple, no people under 18</td>
<td>2,902</td>
<td>23.7%</td>
<td>11,150</td>
<td>23.7%</td>
</tr>
<tr>
<td>Female Householder, no people under 18</td>
<td>862</td>
<td>7.1%</td>
<td>3,275</td>
<td>7.0%</td>
</tr>
<tr>
<td>Male Householder, no people under 18</td>
<td>549</td>
<td>4.5%</td>
<td>1,831</td>
<td>3.9%</td>
</tr>
<tr>
<td><strong>Non-Family Households</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Female Householder</td>
<td>1,497</td>
<td>12.2%</td>
<td>6,292</td>
<td>13.4%</td>
</tr>
<tr>
<td>Male Householder</td>
<td>1,234</td>
<td>10.1%</td>
<td>5,764</td>
<td>12.3%</td>
</tr>
<tr>
<td><strong>TOTAL HOUSEHOLDS</strong></td>
<td>12,225</td>
<td>100.0%</td>
<td>47,024</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Data Source: 2018-2022 5-Year American Community Survey, Tables B03002, B05006, B01001, B18101 to B18107, and B11005; 2018-2022 5-Year American Community Survey Table B16001.

NOTE: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. The most populous places of birth and languages at the city and regional levels may not be the same, and are thus labeled separately.
<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>2000</th>
<th>%</th>
<th>2010</th>
<th>%</th>
<th>2022 (Current)</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>RACE / ETHNICITY</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>7,158</td>
<td>18.9%</td>
<td>5,840</td>
<td>13.7%</td>
<td>3,140</td>
<td>7.1%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>1,104</td>
<td>2.9%</td>
<td>962</td>
<td>2.3%</td>
<td>1,369</td>
<td>3.1%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>27,888</td>
<td>73.6%</td>
<td>34,707</td>
<td>81.4%</td>
<td>38,974</td>
<td>88.2%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>1,352</td>
<td>3.6%</td>
<td>918</td>
<td>2.2%</td>
<td>577</td>
<td>1.3%</td>
</tr>
<tr>
<td>Native American</td>
<td>200</td>
<td>0.5%</td>
<td>147</td>
<td>0.3%</td>
<td>26</td>
<td>0.1%</td>
</tr>
<tr>
<td><strong>NATIONAL ORIGIN</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign-Born</td>
<td>12,853</td>
<td>33.9%</td>
<td>12,844</td>
<td>30.1%</td>
<td>12,818</td>
<td>29.0%</td>
</tr>
<tr>
<td><strong>LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>11,657</td>
<td>30.8%</td>
<td>11,870</td>
<td>27.8%</td>
<td>12,225</td>
<td>27.7%</td>
</tr>
<tr>
<td><strong>SEX</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>18,655</td>
<td>49.3%</td>
<td>20,748</td>
<td>48.7%</td>
<td>22,117</td>
<td>50.1%</td>
</tr>
<tr>
<td>Female</td>
<td>19,218</td>
<td>50.7%</td>
<td>21,900</td>
<td>51.4%</td>
<td>22,067</td>
<td>49.9%</td>
</tr>
<tr>
<td><strong>AGE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>13,075</td>
<td>34.5%</td>
<td>12,731</td>
<td>29.9%</td>
<td>13,276</td>
<td>30.0%</td>
</tr>
<tr>
<td>18 to 64</td>
<td>21,161</td>
<td>55.9%</td>
<td>25,387</td>
<td>59.5%</td>
<td>24,749</td>
<td>56.0%</td>
</tr>
<tr>
<td>65+</td>
<td>3,637</td>
<td>9.6%</td>
<td>4,530</td>
<td>10.6%</td>
<td>6,159</td>
<td>13.9%</td>
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<tr>
<td><strong>HOUSEHOLD TYPE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Families with Children</td>
<td>4,675</td>
<td>61.6%</td>
<td>5,356</td>
<td>52.5%</td>
<td>7,159</td>
<td>58.6%</td>
</tr>
</tbody>
</table>
## TABLE 3. DEMOGRAPHIC TRENDS, EL CENTRO MSA

<table>
<thead>
<tr>
<th>Demographic Indicator</th>
<th>2000</th>
<th></th>
<th>2010</th>
<th></th>
<th>Current</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td><strong>RACE / ETHNICITY</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>28,764</td>
<td>20.2%</td>
<td>23,927</td>
<td>13.7%</td>
<td>23,927</td>
<td>13.7%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>5,341</td>
<td>3.8%</td>
<td>5,445</td>
<td>3.1%</td>
<td>5,114</td>
<td>2.9%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>102,812</td>
<td>72.2%</td>
<td>140,271</td>
<td>80.4%</td>
<td>140,271</td>
<td>80.4%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>2,855</td>
<td>2.0%</td>
<td>2,664</td>
<td>1.5%</td>
<td>2,288</td>
<td>1.3%</td>
</tr>
<tr>
<td>Native American</td>
<td>2,098</td>
<td>1.5%</td>
<td>1,981</td>
<td>1.1%</td>
<td>1,642</td>
<td>0.9%</td>
</tr>
<tr>
<td><strong>NATIONAL ORIGIN</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign-Born</td>
<td>45,783</td>
<td>32.2%</td>
<td>53,614</td>
<td>30.7%</td>
<td>58,057</td>
<td>33.3%</td>
</tr>
<tr>
<td><strong>LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Limited English Proficiency</td>
<td>45,144</td>
<td>31.7%</td>
<td>50,035</td>
<td>28.7%</td>
<td>53,606</td>
<td>30.7%</td>
</tr>
<tr>
<td><strong>SEX</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>74,591</td>
<td>52.4%</td>
<td>89,646</td>
<td>51.4%</td>
<td>89,646</td>
<td>51.4%</td>
</tr>
<tr>
<td>Female</td>
<td>67,770</td>
<td>47.6%</td>
<td>84,882</td>
<td>48.6%</td>
<td>84,882</td>
<td>48.6%</td>
</tr>
<tr>
<td><strong>AGE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Under 18</td>
<td>45,911</td>
<td>32.3%</td>
<td>51,098</td>
<td>29.3%</td>
<td>51,098</td>
<td>29.3%</td>
</tr>
<tr>
<td>18 to 64</td>
<td>81,934</td>
<td>57.6%</td>
<td>105,278</td>
<td>60.3%</td>
<td>105,278</td>
<td>60.3%</td>
</tr>
<tr>
<td>65+</td>
<td>14,516</td>
<td>10.2%</td>
<td>18,152</td>
<td>10.4%</td>
<td>18,152</td>
<td>10.4%</td>
</tr>
<tr>
<td><strong>HOUSEHOLD TYPE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Families with Children</td>
<td>16,297</td>
<td>58.5%</td>
<td>20,706</td>
<td>52.9%</td>
<td>20,706</td>
<td>52.9%</td>
</tr>
</tbody>
</table>

Data Sources: U.S. Census 2000 SF1 Tables P008, P012, P019, P021, P027 and P035, U.S. Census 2010 SF1 Tables P5, P12, P29 and P38; 2006-2010 5-Year American Community Survey, Tables B16001 and B05012.

NOTE: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.
Racially and Ethnically Concentrated Areas of Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have:

- An individual poverty rate of 40% or more
  - or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower
- and a non-White population of 50% or more

Using a metric that combines demographic and economic indicators helps to identify a jurisdiction’s most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Hispanic populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.4

Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. The majority of concentration of poverty is within the largest metro areas, but suburban regions have experienced the fastest growth rate5.

The following figures show poverty levels by census tract in comparison to concentrations of residents by race/ethnicity and national origin. The maps also show

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R/ECAP census tract in El Centro outlined in pink, as well as concentration of Black and Hispanic residents by census tract.

**FIGURE 1.**
POVERTY RATES AND POPULATION BY RACE AND ETHNICITY IN EL CENTRO, 2018 TO 2022

Source: 2018-2022 ACS 5-Year Estimates, Tables S1701, B03002
FIGURE 2.
POVERTY RATES AND POPULATION BY NATIONAL ORIGIN IN EL CENTRO, 2018 TO 2022

Source: 2018-2022 ACS 5-Year Estimates, Tables S1701, B05006
As shown in Figure 1, El Centro currently contains one (1) census tract with R/ECAP designation. This tract exists in areas with higher-than-average concentrations of both Black and Hispanic residents, as well as areas with a high concentration of foreign-born residents as shown in Figure 2. This tract meets the definition of a Racially or Ethnically Concentrated Area of Poverty in that they have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.

**Segregation and Integration**

Communities experience varying levels of segregation between different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.\(^6\)

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

**Race and Ethnicity**

A significant share of El Centro’s population is Hispanic/Latino (88.2%), and based on the spatial distribution of residential patterns, Hispanic residents appear to live throughout the city without any major indications of segregation. However, there appears to be a higher concentration of white residents in the far west side of El Centro. The one RECAP tract in the city also contains the smallest concentration of white residents compared to the rest of the city. Downtown El Centro and its surrounding neighborhoods appear to be the most racially and ethnically integrated areas. However, neighborhoods that appear integrated based on current residential patterns may be in the stages of gentrification and amidst changes in racial and ethnic

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composition that will eventually make them less diverse.

Figure 3 and Figure 4 show the development of El Centro’s racial and ethnic neighborhood composition from 2000 to 2022. The most noticeable change over the past 20 years is the growth of the Hispanic population, shown in orange. Black residents of El Centro have increased slightly and are mainly clustered in the central part of the city within the RECAPs tract and with a slight expansion in the surrounding tracts. Hispanic residents have expanded outwards from the central city in a less concentrated way. In 2000, white residents were mostly concentrated in the western portion of the city, and while they are still mostly living in this part of the city in 2022, their overall population has decreased significantly. Overall population growth and density has increased in a few areas in El Centro including the far northeast quadrant and the far southern portion of the city.
FIGURE 3.
POPULATION BY RACE AND ETHNICITY IN EL CENTRO, 2018 TO 2022

Source: 2018-2022 ACS 5-Year Estimates, Table B03002
FIGURE 4.
POPULATION BY RACE AND ETHNICITY IN EL CENTRO, 2000

Source: 2000 Decennial Census
Segregation Levels

In addition to visualizing racial and ethnic compositions of the area with the preceding maps, this study also uses a statistical analysis—referred to as dissimilarity—to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology uses a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to match the distribution of the majority, or vice versa.

The table below shares the dissimilarity indices for three pairings in El Centro. This table presents values for 1990, 2000, 2010, and 2020, all calculated using census tracts as the area of measurement.

The DI calculated for each pairing in El Centro show that segregation between Black and white residents has decreased between 2000 and 2020. However, segregation has increased once again within the last ten years, growing from 32.96 to 44.63 which calculated a moderate segregation between Black and White residents. Overall, there has been an increase in segregation between white residents and all different racial/ethnic groups in El Centro, particularly within the last ten years.

### TABLE 4. RACIAL AND ETHNIC DISSIMILARITY INDEX TRENDS IN EL CENTRO

<table>
<thead>
<tr>
<th>Race / Ethnicity</th>
<th>EL CENTRO, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1990</td>
</tr>
<tr>
<td>Non-White/White</td>
<td>29.84</td>
</tr>
<tr>
<td>Black/White</td>
<td>54.99</td>
</tr>
<tr>
<td>Hispanic/White</td>
<td>30.04</td>
</tr>
<tr>
<td>Asian or Pacific Islander/White</td>
<td>19.67</td>
</tr>
</tbody>
</table>

National Origin and Limited English Proficiency Population

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations recently.\(^7\) Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.\(^8\)

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.\(^9\) Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.\(^10\)

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

As shown in FIGURE 5, El Centro has a high concentration of Mexican-born residents throughout the city which may be due to its close proximity to Mexico’s border and surrounding predominantly Hispanic/Latino communities in southern California. Due to the high concentration of Mexican-born residents, there does not appear to be a concentration of residents born in other countries. The other most populous countries

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residents in El Centro are from include China, Korea, Guatemala, and El Salvador. As shown in Figure 6, the primary language spoken by residents with a Limited English Proficiency is Spanish. Residents speaking primarily this language are dispersed throughout the entire city given that majority of residents born in Mexico, El Salvador, and Guatemala may be fluent in Spanish. This corresponds the locations of Hispanic communities (Figure 1) within El Centro.
FIGURE 5.
FOREIGN-BORN POPULATION BY NATIONALITY IN EL CENTRO, 2018 TO 2022

Source: 2018-2022 ACS 5-Year Estimates, Table B05006
FIGURE 6.
POPULATION WITH LIMITED ENGLISH PROFICIENCY IN EL CENTRO, 2018 TO 2022

LEP Population by Language Spoken (Top 5 Most Populous)
1 Dot = 5 People
- Spanish
- Korean
- Chinese
- Arabic
- Other

El Centro City Limits
R/ECAPs (Racially or Ethnically Concentrated Areas of Poverty)

Source: 2018-2022 ACS 5-Year Estimates, Table B16002
Access to Opportunity

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education, affordable transportation, a healthy environment, fresh, affordable food, and healthcare. However, residents’ neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections access to opportunity in El Centro, including employment and workforce development, education, transportation, environmental quality, fresh food, and healthcare.

Employment and Workforce Development

Neighborhoods with jobs in close proximity are often assumed to have good access to jobs. However, distance alone does not capture any other factor such as transportation options, the type of jobs available in the area, or the education and training necessary to obtain them. There may be concentrations of jobs and low-income neighborhoods in urban centers, but many of the jobs are unattainable for residents of low-income neighborhoods. Therefore, this section analyzes both the labor market engagement and jobs proximity indices which, when considered together, offer a better indication of how accessible jobs are for residents of a specific area.
Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents’ engagement with the labor market. In El Centro, about 72% of all residents have at least high school graduate level of education, and about 16% have a bachelor’s degree or higher of education. However, as shown below, educational attainment levels vary by race and ethnicity. Asian and Pacific Islander residents have the highest levels of both high school and college education, while Black residents have the lowest levels of college education and Native American residents have the lowest levels of high school education. Hispanic residents, who are the predominant racial or ethnic group in the City, have high school education rates of about 62% and college education rates of about 11%. White, Black, and Asian/Pacific Islander residents all have high school education levels of over 90%, but have significantly varying levels of college education, with only 1.1% of Black residents holding a bachelor’s degree in comparison with nearly half of Asian/Pacific Islander residents and nearly a third of white residents.

**FIGURE 7.**
EDUCATIONAL ATTAINMENT FOR RESIDENTS AGED 25+ BY RACE / ETHNICITY

Source: 2018-2022 ACS 5-Year Estimates, Table S1501
Educational attainment also varies by location within El Centro. In three census tracts in the northern central portions of the City, including one tract designated as a R/ECAP, 10% or less of all residents aged 25+ have a bachelor’s degree. In one census tract in western El Centro, more than 25% of residents aged 25+ have a bachelor’s degree. These education rates strongly correlate with unemployment rates and median household income levels as presented in Figure 12 and Figure 13.

**FIGURE 8.**
EDUCATIONAL ATTAINMENT FOR RESIDENTS AGED 25+ BY CENSUS TRACT

Source: 2018-2022 ACS 5-Year Estimates, Table S1501
Labor force participation rate refers to the percent of a population aged 16 or over that is employed or actively seeking work. This rate varies in El Centro by race and ethnicity. As shown below, Black and Asian/Pacific Islander residents have the highest labor force participation rates in El Centro and are the only two racial or ethnic groups with participation rates over 60%. White and Native American residents have the lowest labor force participation rates, and white residents are the only group with rates under 50% at 49.9%.

**FIGURE 9.**
LABOR FORCE PARTICIPATION RATE FOR POPULATION AGED 16+ BY RACE / ETHNICITY

Source: 2018-2022 ACS 5-Year Estimates, Table S2301

The average participation rate for El Centro as a whole is 58%, but this also varies by location within the City, as shown below. Four census tracts in El Centro have labor force participation rates of 52% or less, while three have rates of 61% or more. Notably, all three tracts shown in Figure 8 where fewer than 10% of residents hold a bachelor’s degree also have lower-than-average labor force participation rates.
FIGURE 10.
LABOR FORCE PARTICIPATION BY CENSUS TRACT

Percent of Residents aged 16+ in Labor Force
- Yellow: 52% or less
- Green: 52.1-55%
- Navy: 61.1-64%
- Teal: 55.1-58%

Source: 2018-2022 ACS 5-Year Estimates, Table S2301
An unemployment rate refers not to a share of the overall population but to the share of a group’s labor force that is unemployed but actively seeking work. This rate varies significantly in El Centro by race and ethnicity, as shown below. All racial and ethnic groups have unemployment rates of less than 12% with the notable exception of Native American residents, who have an unemployment rate of 52.9%. Among other groups Black residents have the lowest unemployment rate at just 3.1%, and white, Asian/Pacific Islander, and multi-racial residents also all have unemployment rates under 10%. Hispanic residents and residents of other races or ethnicities have unemployment rates just over 10%, at 11% and 10.6% respectively.

FIGURE 11.
UNEMPLOYMENT IN EL CENTRO BY RACE / ETHNICITY

Unemployment rates in El Centro also vary significantly by geography and are strongly correlated to education rates, as shown in Figure 8 and Figure 12. Just one census tract in south El Centro has an unemployment rate of 5% or less, while four tracts, including the City’s only R/ECAP tract, have unemployment rates over 15%. Two of these tracts are tracts in which fewer than 10% of residents hold a bachelor’s degree.

Source: 2018-2022 ACS 5-Year Estimates, Table S2301
Median household income, or MHI, is another indicator of access to employment and jobs that pay living wages. The median household income in El Centro was $54,922 as of the 2018-2022 American Community Survey five-year estimates, which is significantly lower than the MHI of $91,551 for California and slightly lower than the MHI of $57,310 El Centro, CA Metro area. Median household incomes are lowest in two census tracts.
located in northwest El Centro, one of which is designated as a R/ECAP. Both of these tracts, in which median household income is $40,000 or less per year, are also tracts where fewer than 10% of residents hold a bachelor’s degree (see Figure 8).

FIGURE 13.
MEDIAN HOUSEHOLD INCOME

Source: 2018-2022 ACS 5-Year Estimates, Table S1901
Low median household incomes in many of the City’s census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. The MIT Living Wage Calculator estimates that for a family of two working adults and one child living in Imperial County, the minimum annual household income considered to be a living wage is $81,304, or approximately $6,775 per month combined ($3,387.50 per month per wage earner). However, as shown in Figure 13, only two census tracts in El Centro have a median household income of over $80,000 per year. Additionally, the U.S. Census Bureau reports that only 44.5% of primary jobs in El Centro pay more than $3,333 per month. This means that the majority of El Centro households do not have access to jobs paying living wages to meet the area’s cost of living.

**Jobs Proximity**

Jobs in El Centro are clustered in the center of the City, where three tracts contain more than 2,000 jobs each. Most tracts in the northern, southern, and eastern portions of the City also contain a high number of jobs, with western tracts tending to have fewer jobs.

---

11 [https://livingwage.mit.edu/counties/06025](https://livingwage.mit.edu/counties/06025)  
12 [https://onthemap.ces.census.gov/](https://onthemap.ces.census.gov/)
Longitudinal Employer-Household Dynamics data, or LODES data, also indicates that a substantial share of workers living in El Centro work outside of the City, and that many people who work in the City live outside of the jurisdiction. As shown below, only about 31% of El Centro’s work force, or about 5,875 people, live within El Centro City limits. The remaining 69% of the work force, around 13,000 people, commute to El Centro from...
outside of the City limits. Additionally, over 11,000 El Centro residents live within the City limits but work outside – nearly double the number of City residents who work within City limits. The high level of commuting across jurisdictions indicates that limited access to vehicles and a lack of frequent public transportation in some areas may present a significant barrier for residents in accessing employment, which can in turn present a barrier to fair housing access.

**FIGURE 15.**
INFLOW AND OUTFLOW OF WORKERS IN EL CENTRO

Transportation

Affordable, accessible transportation makes it easier for residents to access a range of opportunities, providing connections to employment, education, fresh food, healthcare, and other services. Low-cost public transit can facilitate access to these resources, while a lack to access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

Vehicle Access

Access to vehicles also shapes residents’ ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. According to the 2018-2022 American Community Survey estimates, 6.2% of El Centro households do not have access to a vehicle. This rate varies by location, as depicted below – in one census tract in southern El Centro every household has access to a vehicle, while in two census tracts in central and western El Centro, including the City’s only R/ECAP tract, more than 10% of households do not have vehicle access.
Other Affordable Transportation Access

For residents who do not have access to a vehicle, other affordable transit options are crucial in supporting fair housing access. Without access to affordable and reliable transit, residents are severely limited in their choice of residential location by a need to...
This is especially prominent in areas with limited walkability – according to the website WalkScore, El Centro has an average walkability score of 51 and a bike score of 46, meaning that minimal errands can be accomplished on foot or by bicycle. El Centro’s walkability score increases near the City center and decreases near the City limits.

**FIGURE 16.**
**WALKSCORE IN EL CENTRO**

Figure 17 maps the area’s walkability by block group using EPA’s National Walkability Index, which is “based on measures of the built environment that affect the probability of whether people walk as a mode of transportation: street intersection density, proximity to transit stops, and diversity of land uses.” Certain areas of downtown/central El Centro are scored as “most walkable”, and a large portion of the city is deemed “above average walkable”. In accordance with previously examined patterns of transit & vehicle access, areas along the outskirts of the city were categorized as “below average walkable”. No area inside El Centro’s city limits was scored as “least walkable”.

Source: walkscore.com/CA/El_Centro
Figure 18 visualizes transportation costs as a percentage of household income by census tract, using H+T® Index data provided by the Center for Neighborhood Technology (CNT). Considering transportation costs together with housing costs can provide an expanded view of a neighborhood’s affordability. Based on this data,
households near central/downtown El Centro, where bus routes are more robust, spend slightly less on transportation than those living on the outskirts or outside of the city limits.

**FIGURE 18.**
TRANSPORTATION COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME

The 2018-2022 ACS estimates that during this 5-year period, approximately 0.4% of El Centro’s labor force used public transit to commute to work, 1.7% walked to work, and 1.7% used a taxicab or other similar method to commute to work. None of El Centro’s workforce reported bicycling to work during this time, emphasizing WalkScore’s report of limited to no bicycle infrastructure within the City. These rates varied significantly by location within the City, as shown below.

**FIGURE 25.**
**MEANS OF TRANSPORTATION TO WORK IN EL CENTRO FOR RESIDENTS WITHOUT VEHICLES**

Source: 2018-2022 ACS 5-Year Estimates, Table S0801
The City of El Centro’s official website lists the following public transit options, which will be discussed in greater detail in the following chapter:

- **Imperial Valley Transit** provides bus service to the greater area, including El Centro.

- **IVT RIDE** provides curb to curb transit service for seniors; persons aged 60 years and over, and persons with disabilities upon advance phone reservation.

- **IVT MedTrans** provides transit between Imperial Valley and San Diego County medical facilities, clinics and doctor offices. This service is provided four days a week to transit-dependent persons requiring essential or lifeline medical services who meet the established criteria.

- **IVT Access** offers transit services to residents who cannot drive due to disability with advanced reservation.

13 https://cityofelcentro.org/publicworks/public-transportation/
Low-Poverty Neighborhoods

Poverty rates are highest in central and far eastern/western El Centro (see Figure 19). The City has an overall poverty rate of 21.1%, with three tracts reporting poverty rates over 20% and two tracts with rates over 30%. No one race or ethnicity is over-represented in these areas, but there is correlation present between poverty rates, educational attainment, and unemployment (see Figure 8 and Figure 12). When residents’ housing choices are limited to high-poverty neighborhoods by factors like vehicle or transit access, job availability, food access, etc., this may constitute a barrier to fair housing choice.

Housing-related factors which limit residents to high-poverty areas frequently include the following:

- a lack of supply of affordable housing supply;
- a lack of supply of housing in general, which drives up overall housing prices;
- a lack of variety of housing types available, including tiny homes, townhomes, and smaller homes that may be more affordable;
- high rental rates and displacement of residents due to increases in rents;
- limited development of multifamily housing and smaller, more affordable housing units due to restrictive zoning ordinances.
FIGURE 19.
POVERTY RATES IN EL CENTRO

Source: 2018-2022 ACS 5-Year Estimates, Table S1710
Environmental Quality

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in counties, cities, and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.

Access to Parks

The Trust for Public Land estimates the need for parks by census block group based on population density, density of low-income households, density of people of color, rates of poor mental health and low physical activity, urban heat islands, and pollution burden. Based on these factors, El Centro has adequate park access within a 10-minute walk of residents within most of the central portion of the City, but lacks access in most areas surrounding the City borders (see Figure 20).

The Trust for Public Land also measures park access by age, income level, and race and ethnicity (see Figure 28). In El Centro, Black residents and residents of other races have the highest levels of park access, while white and Asian residents have the lowest levels. Unusually, low-income residents have higher levels of park access than mid- and high-income residents. This may be due to increased park access in the City center and the tendency of high-income residents to reside in suburbs on the fringes of cities. Park access by age is fairly evenly distributed, with 70-73% of residents of all ages having access to a park within a 10 minute walk.

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FIGURE 20.
PARKS ACCESS BY GEOGRAPHY IN EL CENTRO

Source: Trust for Public Land, parkserve.tpl.org/mapping/#/?CityID=0621782
FIGURE 21.
PARK ACCESS BY DEMOGRAPHICS IN EL CENTRO

El Centro residents who live within a 10-minute walk of a park

By Age (%)
- Children (0 - 19): 71%
- Adults (20 - 64): 70%
- Seniors (65+): 73%

By Income (%)
- High Income: 60%
- Middle Income: 74%
- Low Income: 78%

By Race/Ethnicity (%)
- Native American*: 72%
- Asian*: 54%
- Black*: 78%
- Hispanic: 72%
- Pacific Islander*: 69%
- White*: 64%
- 2 or More Races*: 71%
- Other*: 76%

*Excludes those that report Hispanic origin (which is captured separately from race by the U.S. Census).

Source: Trust for Public Land, /www.tpl.org/city/el-centro-california
Environmental Hazards

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and / or the environment. These sites are placed on the National Priorities List (NPL). There are no Superfund sites in close proximity to El Centro, but one site has been proposed by Stoker Company for future development within Imperial County.¹⁵

The EPA’s National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2019 to examine cancer risk from ambient concentrations of pollutants¹⁶ and is presented below. The are four facilities in El Centro which produce emissions that may contribute to cancer risk, but overall risk is low and does not vary by location within the City.

FIGURE 22.
AIR TOXICS SCREENING ASSESSMENT

Source: https://www.epa.gov/AirToxScreen/airtoxscreen-mapping-tool

¹⁵ https://semspub.epa.gov/src/document/09/2400177

The Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed. There are six TRI sites located within El Centro, which may potentially pose additional risk to residents living nearby.

**FIGURE 23. TOXIC RELEASE INVENTORY FACILITIES**

![Map of Toxic Release Inventory Facilities](https://enviroatlas.epa.gov/enviroatlas/interactivemap/)

*Source: [https://enviroatlas.epa.gov/enviroatlas/interactivemap/](https://enviroatlas.epa.gov/enviroatlas/interactivemap/)*
Food
Many individuals and families in the United States face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often present barriers to accessing healthy food.

The USDA Food Research Atlas indicates food access issues in urban areas by measuring the share of residents who have low incomes and live further than one-half mile from the nearest supermarket. In El Centro, the share of residents with food access issues is greatest in the central and eastern parts of the City, including within the City’s only R/ECAP census tract (see Figure 24). There are five tracts within the City where 30-40% of residents are considered low income and low access, and one tract where more than 40% of residents face these issues. A lack of close access to a supermarket may be compounded by lack of transit access, and Figure 23 shows that all tracts where 30% or more of residents have food access issues are also tracts where 5% or more of households do not have access to a vehicle.

The non-profit Feeding America estimates that 17% of Imperial County residents face food insecurity, or more than 30,000 people (see Figure 25). They further estimate that 85% of such residents would be income-eligible for SNAP benefits. This indicates a potential need to expand SNAP and other similar benefits in the area.
FIGURE 24.
FOOD ACCESS IN EL CENTRO

Source: USDA 2019 Food Access Research Atlas Data
FIGURE 25.
FOOD INSECURITY IN IMPERIAL COUNTY

2021 Food Insecurity In Imperial County, California

FOOD INSECURE POPULATION IN IMPERIAL COUNTY, CALIFORNIA

30,630

FOOD INSECURITY RATE IN IMPERIAL COUNTY, CALIFORNIA

17.0%

AVERAGE MEAL COST IN IMPERIAL COUNTY, CALIFORNIA

$3.15

ESTIMATED PROGRAM ELIGIBILITY AMONG FOOD INSECURE PEOPLE IN IMPERIAL COUNTY, CALIFORNIA

15% Above SNAP threshold of 200% poverty
85% Below SNAP, Other Nutrition Programs threshold of 200% poverty

ANNUAL FOOD BUDGET SHORTFALL

$17,064,000

Source: map.feedingamerica.org/county/2021/overall/california/county/imperial
Healthcare

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length of life and quality of life. The United States Health Resources and Services Administration (HRSA) identifies geographic areas with a lack of access to primary care services, known as Medically Underserved Areas\(^\text{17}\). The HRSA calculates an Index of Medical Underservice based on the number of providers per 1,000 population ratio, the percent of population at 100% of the Federal Poverty Level, the percent of population age 65 and over, and the infant mortality rate. According to this metric, Imperial County has been designated as a medically underserved area for primary care physicians since 1993\(^\text{18}\).

### TABLE 5. RATIO OF POPULATION TO HEALTHCARE PROVIDERS, IMPERIAL COUNTY AND THE STATE OF CALIFORNIA, 2019-2021

<table>
<thead>
<tr>
<th></th>
<th>Imperial County</th>
<th>California</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Care Physicians</td>
<td>26.69</td>
<td>93.79</td>
</tr>
<tr>
<td>Dentists</td>
<td>22.24</td>
<td>79.08</td>
</tr>
<tr>
<td>Psychologists</td>
<td>N/A</td>
<td>101.2</td>
</tr>
</tbody>
</table>

Source: County Health Rankings, Area Health Resource File/ American Medical Association, 2019-2021

Note: ratio is presented as number of providers per 100,000 residents

In addition to access to healthcare providers, health insurance coverage is an important component of access to needed healthcare—including preventive care—and to maintaining financial security. While the share of residents with health insurance in El Centro overall has increased to 94.3% as of the 2018 to 2022 American Community Survey five-year estimates, up from 82.4% in the 2011-2015 estimates, shares of uninsured residents continue to vary by location across the county.

The share of residents without health insurance is highest in the northeastern portion of the City, which contains two census tracts where more than 10% of residents are uninsured. Two more tracts, including El Centro’s only R/ECAP tract, have uninsurance rates of between 8% and 10%.

Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, income, housing affordability and stability, and access to vehicles or other transportation options. Investments in programs designed to increase access to healthcare—such as expanding access to health insurance, investing in telehealth and mobile health services, education about where to access health services, and improved cultural responsiveness—may help increase access for


\(^{18}\) https://data.hrsa.gov/tools/shortage-area/mua-find
residents. Because of geographic disparities in health insurance coverage, efforts such as increasing enrollment in Medicaid and Marketplace health insurance plans and providing access to low-cost health services may be most effective in addressing goals of improving access to healthcare by focusing efforts on census tracts with low levels of health insurance coverage.

**FIGURE 26.**
ACCESS TO HEALTH INSURANCE IN EL CENTRO

![Map showing access to health insurance in El Centro](image)

Percent of Residents without Health Insurance
- 4% or less
- 4.1-6%
- 6.1-8%
- 8.1-10%
- More than 10%

Source: 2018-2022 ACS 5-Year Estimates, Table S2701
Housing Profile

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income; however, the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which result in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.\(^\text{19}\) Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.\(^\text{20}\) Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to socioeconomically disadvantaged neighborhoods where housing costs are most affordable.\(^\text{21}\)

This section discusses the existing supply of housing in El Centro. It also reviews housing costs, including affordability and other housing needs by householder income. Homeownership rates and access to lending for home purchases and mortgage refinancing are also assessed.


Housing Supply Summary

Vacancy rates within a jurisdiction’s housing supply can indicate certain characteristics of the overall supply. For example, a high vacancy rate in an area where residents report housing access issues can indicate that a barrier to access may lie in price or condition of housing, rather than in an inadequate number of units. Conversely, a low vacancy rate in an area with housing access issues may indicate a need for new unit construction.

Vacancy data for the City of El Centro and for the El Centro, CA Metro Area is shown below. In this instance, it is important to note that there are discrepancies present between 2020 Census data and 2018-2022 ACS data. Most notably, ACS data indicates that there are fewer housing units in the jurisdiction in 2022 than there were in 2020 and that vacancy rates in both the City and County reversed twenty-year trends to more than double between 2020 and 2022. This is highly unusual, as numbers of housing units typically increase within a jurisdiction over time due to new construction. Potential explanations for such a notable loss of units could include a large natural disaster event destroying a significant number of units or an adjustment of City limits to exclude areas which were previously incorporated. Absent these explanations, it is possible that 2018-2022 ACS data contains an error when reporting number of units for El Centro. For this reason, the table below depicts both 2020 Census data, which is more consistent with previous housing trends, and 2018-2022 ACS data, which may provide more up-to-date information.

In comparison to the overall state of California vacancy rate of 7.7%\textsuperscript{22}, vacancy rates within both the City and County as reported by the 2018-2022 ACS are unusually high and have increased significantly within the past ten to twenty years. Most notably, the number of occupied housing units has gone down in both jurisdictions since 2010. Within El Centro, the total number of housing units also went down from 2010-2022. This is unusual, as numbers of housing units typically increase within a jurisdiction over time due to new construction. Loss of overall units indicates that more units were destroyed over time than were built, either intentionally or by natural disaster.

\textsuperscript{22} 2017-2022 American Community Survey 5-Year Estimates, Table DP04
TABLE 6. HOUSING UNITS BY OCCUPANCY STATUS

<table>
<thead>
<tr>
<th></th>
<th>2000</th>
<th>2010</th>
<th>2020</th>
<th>2022</th>
<th>2000 to 2022 Change</th>
</tr>
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<tbody>
<tr>
<td><strong>EL CENTRO</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL HOUSING UNITS</td>
<td>12,263</td>
<td>14,476</td>
<td>15,041</td>
<td>13,958</td>
<td>+1,695</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>11,439</td>
<td>13,108</td>
<td>14,137</td>
<td>12,225</td>
<td>+786</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>824</td>
<td>1,368</td>
<td>904</td>
<td>1,733</td>
<td>+909</td>
</tr>
<tr>
<td>Vacancy Rate</td>
<td>6.7%</td>
<td>9.5%</td>
<td>6.0%</td>
<td>12.4%</td>
<td>+5.7</td>
</tr>
<tr>
<td><strong>IMPERIAL COUNTY</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL HOUSING UNITS</td>
<td>43,891</td>
<td>56,067</td>
<td>56,625</td>
<td>56,907</td>
<td>+13,016</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>39,384</td>
<td>49,126</td>
<td>52,050</td>
<td>47,024</td>
<td>+7,640</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>4,507</td>
<td>6,941</td>
<td>4,575</td>
<td>9,883</td>
<td>+5,376</td>
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<tr>
<td>Vacancy Rate</td>
<td>10.3%</td>
<td>12.4%</td>
<td>8.1%</td>
<td>17.4%</td>
<td>+7.1%</td>
</tr>
</tbody>
</table>


Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes will typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size, and markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

In El Centro and surrounding Imperial County single-family detached homes are by far the most common housing type, making up more than half of all housing units in both jurisdictions. The next most common housing type in El Centro is 2-4 unit structures, or duplexes, triplexes, and quadplexes, followed by small apartment buildings with 5-19 units. Large apartment complexes with 20 or more units and mobile homes each make up nearly 9% of El Centro homes, while single-family attached units like townhomes make up just 2.5%. Home types such as RVs, boats, or vans are very uncommon.
Many areas have distinct differences in housing characteristics between owners and renters. This is particularly true regarding unit size. In El Centro housing is split fairly evenly between owners and renters, with approximately 51% of residents residing in a home they own and 49% of residents residing in a home they rent; however, renters are significantly more likely to reside in a small unit than owners. Nearly one-third of renters in the City live in a studio or one-bed unit, in comparison to less than 4% of owners. Conversely, only 8.8% of renters live in a home with four or more bedrooms, in comparison with 43.8% of owners. Trends are similar in Imperial County, where 4.3% of owners live in a studio or one-bed home while almost one-quarter of all renters live in a home this size.
### TABLE 8. HOUSING UNITS BY SIZE AND TENURE

<table>
<thead>
<tr>
<th>Number of Bedrooms</th>
<th>El Centro</th>
<th>Imperial County</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>OWNER-OCUPUPIED HOUSING UNITS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0 Bedrooms</td>
<td>52</td>
<td>0.8%</td>
</tr>
<tr>
<td>1 Bedroom</td>
<td>184</td>
<td>3.0%</td>
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<tr>
<td>2 or 3 Bedrooms</td>
<td>3,250</td>
<td>52.4%</td>
</tr>
<tr>
<td>4 or More Bedrooms</td>
<td>2,714</td>
<td>43.8%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>6,200</td>
<td>100.0%</td>
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<tr>
<td>RENTER-OCCUPIED HOUSING UNITS</td>
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<tr>
<td>0 Bedrooms</td>
<td>395</td>
<td>6.6%</td>
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<tr>
<td>1 Bedroom</td>
<td>1,515</td>
<td>25.1%</td>
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<td>2 or 3 Bedrooms</td>
<td>3,586</td>
<td>59.5%</td>
</tr>
<tr>
<td>4 or More Bedrooms</td>
<td>529</td>
<td>8.8%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>6,025</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2018-2022 5-Year ACS Estimates, Table B25042.

NOTE: Total add to the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Assessing housing conditions in an area can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of an area’s housing can have substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Additionally, homes built prior to 1978 present the potential for lead exposure risk due to lead-based paint or lead pipes carrying drinking water.

Data shows that 46.5%, or nearly half, of El Centro’s housing stock was built prior to 1980 and therefore is likely at risk of lead exposure (data is available from the U.S. Census Bureau only in decade categories and it is therefore impossible to ascertain the number of homes built prior to exactly 1978, so prior to 1980 is the best estimate). Housing stock in El Centro trends older than housing stock in the wider County, as shown below. The 2008 housing crisis had a significant impact on the area, with a sharp drop in housing built in 2010 or later. Less than 20% of El Centro’s housing units are under 20 years old.
while 65% of all units are over 40 years old. This indicates that El Centro will likely experience elevated costs associated with maintenance and repair of older housing units in comparison to cities with an overall newer housing stock.

**FIGURE 27.**
**AGE OF HOUSING IN EL CENTRO AND IMPERIAL COUNTY**

![Bar chart showing the age distribution of housing in El Centro and Imperial County.](source: 2018-2022 ACS 5-Year Estimates, Table B25034)
Housing Costs and Affordability

The availability of housing that is both affordable and in good condition was a common need identified by stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition’s annual Out of Reach report examines rental housing rates relative to income levels for counties throughout the U.S. The figure below shows annual household income and hourly wages needed to afford Fair Market Rents in Imperial County. As shown below, no units in the County would be considered affordable to an individual working 40 hours per week at minimum wage, and only a one-bed unit would be affordable to an individual working 40 hours per week at the County’s average renter wage. It is likely that this issue particularly impacts single-parent households, who have a need for larger unit sizes but typically only have one wage-earner per household.

FIGURE 28.
REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS IN IMPERIAL COUNTY, 2023

<table>
<thead>
<tr>
<th>HOUSING COSTS (FAIR MARKET RENTS)</th>
<th>ANNUAL INCOME NEEDED TO AFFORD</th>
<th>HOURLY WAGE FOR 40/HR WEEK NEEDED TO AFFORD</th>
<th>HOURS/WK AT AVG HOURLY WAGE NEEDED TO AFFORD</th>
<th>HOURS/WK AT MINIMUM WAGE NEEDED TO AFFORD</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom: $904</td>
<td>1 bedroom: $36,160</td>
<td>1 bedroom: $17.38</td>
<td>1 bedroom: 41</td>
<td>1 bedroom: 45</td>
</tr>
<tr>
<td>2 bedroom: $1,155</td>
<td>2 bedroom: $46,200</td>
<td>2 bedroom: $22.21</td>
<td>2 bedroom: 52</td>
<td>2 bedroom: 57</td>
</tr>
<tr>
<td>3 bedroom: $1,606</td>
<td>3 bedroom: $64,240</td>
<td>3 bedroom: $30.88</td>
<td>3 bedroom: 72</td>
<td>3 bedroom: 80</td>
</tr>
<tr>
<td>4 bedroom: $1,952</td>
<td>4 bedroom: $78,080</td>
<td>4 bedroom: $37.54</td>
<td>4 bedroom: 88</td>
<td>4 bedroom: 97</td>
</tr>
</tbody>
</table>

Minimum wage in El Centro is $15.50, and average renter income is $35,618 per year or $1712 per hour.


Data is also available from the U.S. Census Bureau on average monthly housing costs for owners and renters within a given jurisdiction. The graphs below show average costs for owners and renters in both El Centro and Imperial County. It is important to note that this American Community Survey is aggregate data for the years 2018-2022 and is therefore somewhat of a lagging indicator. 2018-2022 ACS data shows that in El Centro, 50% of renters pay between $500 and $999 in rent per month; however, the real estate site Zumper, which is the largest privately held rental platform in the U.S., reports that rental prices in El Centro have increased exponentially within the past year, especially for smaller housing units. This data is also depicted below.
FIGURE 29.
GROSS MONTHLY RENT FOR RENTER HOUSEHOLDS IN EL CENTRO AND IMPERIAL COUNTY, 2018-2022

FIGURE 30.
MONTHLY HOUSING COSTS FOR OWNER HOUSEHOLDS IN EL CENTRO AND IMPERIAL COUNTY, 2018-2022

Source: 2018-2022 ACS 5-Year Estimates, Table B25094.
These sources combined indicate that rental costs are rising significantly more rapidly than wages in the area. While 2018-2022 ACS data showed that renters were compressed into an overall smaller price range than owners, especially in regard to monthly costs over $1,500, Zumper data indicates that this gap may be rapidly shrinking. It is also notable that 2018-2022 ACS data showed that only about 8.8% of renters spent less than $500 per month on housing, in comparison with around 12.5% of owners. With rapidly increasing rental costs, it is highly likely that the number of renters in this price range has dwindled drastically since 2022, while the number of owners in this price range likely remains about the same due to the relative stability of a mortgage.

**Housing Needs**

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford. To assess affordability and other types of housing needs, HUD defines four housing problems:

1. A household is cost burdened if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. A household is overcrowded if there is more than 1.0 people per room, not including kitchen or bathrooms.
3. A housing unit lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
4. A housing unit lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.
HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau’s American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for El Centro is provided in the tables that follow.

As depicted in Table 9, the share of households with at least one housing need varies drastically by race and ethnicity in El Centro. White residents are least likely to have a housing problem, with just under one quarter of all white households having at least one housing problem. In contrast, nearly 90% of Black households have at least one housing problem, and nearly half of all Hispanic households have at least one housing problem. Large families were more likely to have housing problems than small families, and non-family households were significantly less likely to have a housing problem than either small or large family households. Overall, 40.3% of households in El Centro have at least one housing problem.

The most common type of housing problem in most areas is cost burden, which is defined as a situation in which a household spends more than 30% of its income on housing expenses each month. If a household spends more than 50% of its income on housing each month, this qualifies as severe cost burden. Table 10 examines rates of severe cost burden by race, ethnicity, and household type, revealing that Black households in El Centro are severely cost burdened at a rate over five times higher than that of white households. Hispanic households are nearly three times more likely to be cost burdened than white households, and Asian households are nearly twice as likely. Large family households were about half as likely to be severely cost burdened as small family households, which may indicate more wage earners per household in large family homes. Overall, 12.8% of El Centro households spend more than 50% of their income on housing every month.
### TABLE 9. DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

<table>
<thead>
<tr>
<th></th>
<th># with Problems</th>
<th># of Households</th>
<th>% with Problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race &amp; Ethnicity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>355</td>
<td>1,484</td>
<td>23.9%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>395</td>
<td>443</td>
<td>89.2%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4,630</td>
<td>9,510</td>
<td>48.7%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>84</td>
<td>288</td>
<td>29.2%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>Household Type</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Family Households, &lt;5 People</td>
<td>3,210</td>
<td>7,220</td>
<td>44.5%</td>
</tr>
<tr>
<td>Family Households, 5+ People</td>
<td>1,080</td>
<td>2,095</td>
<td>51.6%</td>
</tr>
<tr>
<td>Non-Family Households</td>
<td>1,165</td>
<td>4,230</td>
<td>27.5%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>5,455</td>
<td>13,545</td>
<td>40.3%</td>
</tr>
</tbody>
</table>

Source: CHAS Tables 1 and 4.
NOTE: Total estimates do not align with categorical numbers. 2016-2020 ACS Estimates for the “Other-Non-Hispanic” racial / ethnic category are not shown, as they have been suppressed due to increased disclosure avoidance protections instituted by Census. All % represent a share of the total population, except household type and size, which is out of total households.
### TABLE 10. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

<table>
<thead>
<tr>
<th>Households Experiencing Severe Cost Burden</th>
<th># with Problems</th>
<th># of Households</th>
<th>% with Problems</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race &amp; Ethnicity</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White, Non-Hispanic</td>
<td>80</td>
<td>1,475</td>
<td>5.4%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>120</td>
<td>440</td>
<td>27.3%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1,510</td>
<td>9,515</td>
<td>15.9%</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>30</td>
<td>290</td>
<td>10.3%</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>0</td>
<td>00</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>30</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>Household Type</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Family Households, &lt;5 People</td>
<td>1,110</td>
<td>7,220</td>
<td>15.4%</td>
</tr>
<tr>
<td>Family Households, 5+ People</td>
<td>180</td>
<td>2,095</td>
<td>8.6%</td>
</tr>
<tr>
<td>Non-Family Households</td>
<td>449</td>
<td>4,230</td>
<td>10.6%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,739</strong></td>
<td><strong>13,545</strong></td>
<td><strong>12.8%</strong></td>
</tr>
</tbody>
</table>

Source: CHAS, Tables 7, 9.

NOTE: Severe housing cost burden is defined as greater than 50% of income. All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # of households is the denominator for the % with problems, and may differ from the # of households for the table on severe housing problems.
Public Investment Patterns

Jurisdictions that receive CDBG funds, such as the City of El Centro, must prepare an annual report of their accomplishments and progress towards goals identified in the Consolidated Plan. This report is known as a Consolidated Annual Performance and Evaluation Report (CAPER). The City of El Centro’s CAPER also provides a report of progress made towards goals identified in the Analysis of Impediments to Fair Housing (AI), which are summarized in TABLE 24.

Here, the City of El Centro’s CAPERs were reviewed from FY2018-FY2023 as a means of analyzing patterns of public investment in services and their potential to create barriers to housing and opportunity for protected classes. Over this time period, the City’s CDBG investments generally fell under the following categories:

- Affordable Housing
- Economic Development
- Fair Housing
- Homeless
- Non-Housing Community Development
- Non-Homeless Special Needs
- Public Housing

CDBG amounts allocated towards the promotion of fair housing services in the City of El Centro have remained steady over this period, though resulting activities have yielded variable numbers of participants. Most years have fallen short of expectations based on the expected number (#) of persons assisted outlined in each program year and the 2019-2023 Consolidated Plan. Reports also note that participation in the City’s Housing Rehabilitation Program, which falls under the affordable housing category and includes the Lead Based Paint Abatement Program, has been low. However, projects focused on providing other public services, such as services for the homeless, seniors, and youth have been quite successful in meeting Consolidated Plan and program year expectations.

It is unlikely that any of the City’s planning, financing, and administrative actions related to the siting of social services would inhibit or concentrate housing opportunities among protected classes. The City allocates CDBG funds towards a wide range of opportunities across the area, partnering with a variety of organizations and leveraging funds with other funding opportunities when possible to make affordable housing development more feasible.
PUBLIC TRANSPORTATION IMPACTS

The City of El Centro and broader Imperial County are served by Imperial Valley Transit (IVT), which provides daily fixed-route services in the city on the Green Line and Blue Line from 6:00am to 6:30pm (see Figure 32 and Figure 33).²³ IVT also offers several regional routes that connect El Centro to other cities in the county. Discounted fares are available for students, seniors, and persons with disabilities.

Other programs that are administered and funded by the Imperial County Transportation Commission (ICTC) include:

- **IVT Ride**: which provides curb-to-curb services for seniors (55+ years) and persons with disabilities upon phone reservation at (760) 337-1760. Reservations are encouraged to be made at least 2 days in advance, but can be made between one day to two weeks in advance of a rider’s planned trip. Same day requests will only be fulfilled if seats and vehicles are available.²⁴

- **IVT MedTrans**: which takes riders between Imperial Valley and San Diego County for non-emergency medical appointments. The schedule can be found at: https://www.ivtmedtrans.com/rider-information/schedule/calendar
  - The pickup & return location in El Centro is located at:
    139 S 7th St
    El Centro, CA 92243

- **IVT Access**: a paratransit service created in response to the Americans with Disabilities Act (ADA), for persons with disabilities who cannot use the regular, fixed-route bus system. The service operates within a ¾ mile corridor and 30 minute window of regular IVT bus services.

The locations of publicly supported housing developments in the City of El Centro are mapped in , along with the Blue and Green Line routes. This visualization indicates that all publicly supported housing options in the city are located on or near existing bus routes.

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FIGURE 32.
IVT BLUE LINE IN EL CENTRO

FIGURE 33.
IVT GREEN LINE IN EL CENTRO

Based on data provided by the State of California’s Employment Development Department (EDD), the top 13 employment centers with the City of El Centro are listed in Table 11, along with their distance to the nearest bus stop. The location of these centers is mapped in Error! Reference source not found. along with IVT’s Blue and Green...
As demonstrated, all major employment centers, except for 8A Packing located on W Ross Ave and the El Centro Naval Air Facility, which is located outside the city limits, are serviced by the fixed bus routes.

**TABLE 11. MAJOR EMPLOYERS IN THE CITY OF EL CENTRO**

<table>
<thead>
<tr>
<th>Employer Name</th>
<th>Location</th>
<th># of Employees</th>
<th>Distance to Nearest Bus Stop</th>
</tr>
</thead>
<tbody>
<tr>
<td>8A Packing LLC</td>
<td>696 E Ross Ave El Centro, CA 92243</td>
<td>250-499</td>
<td>5.4 mi</td>
</tr>
<tr>
<td>Central Union High School District</td>
<td>1001 W Brighton Ave El Centro, CA 92243</td>
<td>250-499</td>
<td>0.3 mi</td>
</tr>
<tr>
<td>Costco Wholesale</td>
<td>2030 N Imperial Ave El Centro, CA 92243</td>
<td>100-249</td>
<td>115 ft</td>
</tr>
<tr>
<td>El Centro Naval Air Facility</td>
<td>2024 Bennett Rd El Centro, CA 92243</td>
<td>500-999</td>
<td>2.2 mi</td>
</tr>
<tr>
<td>El Centro Regional Medical Center</td>
<td>1415 Ross Ave El Centro, CA 92243</td>
<td>500-999</td>
<td>0.1 mi</td>
</tr>
<tr>
<td>Imperial County Behavioral</td>
<td>202 N 8th St El Centro, CA 92243</td>
<td>250-499</td>
<td>0.2 mi</td>
</tr>
<tr>
<td>Imperial County Coroner</td>
<td>328 Applestille Rd El Centro, CA 92243</td>
<td>250-499</td>
<td>250 ft</td>
</tr>
<tr>
<td>Imperial County Office of Education</td>
<td>1398 Sperber Rd El Centro, CA 92243</td>
<td>500-999</td>
<td>0.5 mi</td>
</tr>
<tr>
<td>Imperial County Sheriff</td>
<td>328 Applestille Rd El Centro, CA 92243</td>
<td>250-499</td>
<td>384 ft</td>
</tr>
<tr>
<td>Imperial Irrigation District</td>
<td>2151 W Adams Ave El Centro, CA 92243</td>
<td>1,000-4,999</td>
<td>0.2 mi</td>
</tr>
<tr>
<td>Target</td>
<td>2295 N Imperial Ave El Centro, CA 92243</td>
<td>100-249</td>
<td>0.2 mi</td>
</tr>
<tr>
<td>US Border Patrol</td>
<td>1111 N Imperial Ave El Centro, CA 92243</td>
<td>500-999</td>
<td>0.2 mi</td>
</tr>
<tr>
<td>Walmart</td>
<td>2150 N Waterman Ave El Centro, CA 92243</td>
<td>250-499</td>
<td>390 ft</td>
</tr>
</tbody>
</table>

Figure 35.
MAJOR EMPLOYERS IN THE CITY OF EL CENTRO AND TRANSIT ROUTES

Policies and Procedures

IVT Transit and the other programs mentioned in this section are funded and administered by the Imperial County Transportation Commission (ICTC), which was established under Senate Bill 607 in 2009. According to the California Association of Councils of Governments (CALCOG) website, the responsibilities of the ICTC include:

- The development of the Regional Transportation Plan for the Imperial region and its Regional, State and Federal transportation improvement programs and their updates
- The distribution of Local Transportation Fund monies
- The preparation and submittal of applications for transportation related funds
- Allocation for Transportation Development Act funds
- The planning, programming, and administration of regional transit services
- The encouragement of active citizen participation

The ICTC 2021 Coordinated Public Transit – Human Services Transportation Plan, which the Federal Transit Administration (FTA) defines as a “locally developed, coordinated transportation plan that identifies the transportation needs of individuals with disabilities, seniors and people with low incomes, provides strategies for meeting those needs, and prioritizes transportation services for funding and implementation.” The planning, financing, and administrative actions associated with this latest coordinated plan were reviewed to evaluate the relationship between public transportation and affordable housing opportunities.

As displayed in Figure 34 and Figure 35, IVT provides fixed route bus services to all publicly supported housing developments in the city and most major employers. However, there are still challenges to accessing these services. The coordinated transportation plan identified several recommendations based on community and stakeholder feedback, which included (but are not limited to): expanding weekday evening service; expanding weekend service; increasing service frequency on weekdays; expanding fare purchase and payment options; and implementing real-time bus service information.

According to the same plan, the average IVT rider is employed and uses IVT services to travel to/from work. Among these riders, many work outside the traditional work hours of

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25 CALCOG, “Member Profile: Imperial County Transportation Commission (ICTC).” Last modified 04/07/2023, https://calcoq.org/imperial-county-transportation-commission-ictc/

Monday-Friday from 9:00am – 5:00pm. As such, there is a demand for IVT to expand its weekday evening services, increase its service frequency, and expand weekend services to better serve the needs of this transit-dependent population. Additionally, expanding fare purchase and payment options could encourage increased ridership. Currently, riders must provide exact change when boarding the bus, or they may purchase a multi-ride pass at the transit office, City Hall, or at Imperial Valley College. Allowing passes to be purchased online and/or at a greater number of physical locations would help alleviate this challenge to accessing IVT services.
LENDING AND INSURANCE PRACTICES

Homeownership and Lending

Homeownership is vital to a community’s economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement, and is correlated with positive cognitive and behavioral outcomes among children.

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the White and Black homeownership rate is the largest among racial and ethnic groups. In 2017, the U.S. Census Bureau reported a 21.6 percentage point gap in homeownership rate between White and Black households; just a 2.9 percentage point decrease since 1997.

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is 8 percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.

The table that follows shows the number of owner and renter households, as well as the homeownership rate, by race and ethnicity for El Centro. Overall, tenure data indicates that El Centro is nearly evenly split between owners and renters, but that home ownership rates vary significantly by race and ethnicity. As shown in Table 12, white residents are significantly more likely to be homeowners than any other racial or ethnic

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group despite not being the predominant racial or ethnic group in the City, which is predominantly Hispanic. Just over three quarters of white residents own their homes, in comparison to just 46.2% of Hispanic residents and 36.4% of Black residents. The only other groups with home ownership rates exceeding 50% are Asian and Pacific Islander residents at 51.7% and residents who identify as some other unlisted race or ethnicity at 66.7%.

**TABLE 12. HOME OWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY**

<table>
<thead>
<tr>
<th>Householder Race / Ethnicity</th>
<th>Owner Households</th>
<th>Renter Households</th>
<th>Home Ownership Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>1,110</td>
<td>365</td>
<td>75.3%</td>
</tr>
<tr>
<td>Black</td>
<td>160</td>
<td>280</td>
<td>36.4%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>4,400</td>
<td>5,115</td>
<td>46.2%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>150</td>
<td>140</td>
<td>51.7%</td>
</tr>
<tr>
<td>Native American</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other/Multiple</td>
<td>20</td>
<td>10</td>
<td>66.7%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>5,840</strong></td>
<td><strong>5,910</strong></td>
<td><strong>49.7%</strong></td>
</tr>
</tbody>
</table>

Source: CHAS, Table 9

NOTE: Data presented are number of households, not individuals.

Spatial data, presented in Figure 36 and Figure 37, does not show significant geographic clustering in ownership by race or ethnicity; however, there is clustering of renters in general to the City center, including within the City’s only R/ECAP tract. Clustering of renters also coincides with several factors which may limit access to opportunity.
FIGURE 36.
HOMEOWNER HOUSEHOLDS BY RACE AND ETHNICITY IN EL CENTRO

Homeowner Households by Race and Ethnicity
1 dot = 5 households
- White
- Black
- Hispanic/Latino
- Asian/Pacific Islander
- Native American
- Other

El Centro City Limits
R/ECAPs (Racially or Ethnically Concentrated Areas of Poverty)

Source: 2016 to 2020 CHAS, Table 9
FIGURE 37.
RENTER HOUSEHOLDS BY RACE AND ETHNICITY IN EL CENTRO

Source: 2016 to 2020 CHAS, Table 9
Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of HMDA include ensuring that borrowers and loan applicants receive fair treatment in the home loan market.

The national 2017 HMDA data consists of information for 12.1 million home loan applications reported by 5,852 home lenders, including banks, savings associations, credit unions, and mortgage companies. HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income.

The source for this analysis is tract-level HMDA data for census tracts in El Centro for the year 2022, which includes a total of 1,183 home purchase loan application records. Within each record, some data variables are 100% reported, but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant declined to identify their sex, race and/or ethnicity. Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. Ideally, any missing data for a specific data variable would affect a small proportion of the total number of loan records and therefore would have only a minimal effect on the results.

Of these applications 10.82% were denied by the lending institution. There is no requirement for reporting reasons for a loan denial, but all denials within El Centro in the given year did have a reason provided. HMDA data also does not include a borrower’s total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio, or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors.

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Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use HMDA data in conjunction with information from loan files to assess an institution’s compliance with fair lending laws.

The HMDA data presented in tables 15 and 16 indicates that within El Centro, Asian and Pacific Islander residents are most likely to be denied a home loan, while Black residents are least likely. However, it is important to note that these two groups had a significantly smaller overall number of completed applications in comparison to other racial or ethnic groups and therefore denial rates may be less accurate than for groups with larger sample sizes. In particular, only 5 Black households applied for home loans in 2022, and all were approved. Aside from these two groups, all other groups have very similar denial rates that are consistent with the overall denial rate.

When examining income brackets, denial rates vary significantly. Nearly one-quarter of applications submitted by low-income residents, defined as residents earning less than 80% of the area’s median household income, were denied for home loans. In comparison, only 11.7% of mid-income residents (earning 80-120% of area MHI) and 7.2% of high-income residents (earning more than 120% area MHI) were denied for loans.

The most common reason cited for loan denial among all applicants was an incomplete credit history, followed by debt-to-income ratio. These two reasons combined accounted for just over 35% of all denials. There were no denials due to inability to obtain mortgage insurance, and no denials were given without a reason provided.

---

<table>
<thead>
<tr>
<th>Applicant Home</th>
<th>APPLICANT RACE AND ETHNICITY</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Non-Latino</td>
<td>Latino</td>
</tr>
<tr>
<td></td>
<td>White</td>
<td>Black</td>
</tr>
<tr>
<td>LOW INCOME</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed Applications</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Denial Rate</td>
<td>16.67%</td>
<td>0.00%</td>
</tr>
<tr>
<td>MIDDLE INCOME</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed Applications</td>
<td>21</td>
<td>0</td>
</tr>
<tr>
<td>Denial Rate</td>
<td>14.29%</td>
<td>0.00%</td>
</tr>
<tr>
<td>HIGH INCOME</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed Applications</td>
<td>64</td>
<td>5</td>
</tr>
<tr>
<td>Denial Rate</td>
<td>9.38%</td>
<td>0.00%</td>
</tr>
<tr>
<td>ALL APPLICANTS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completed Applications</td>
<td>91</td>
<td>5</td>
</tr>
<tr>
<td>Denial Rate</td>
<td>10.99%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>


NOTE: applications with no income provided were excluded.
<table>
<thead>
<tr>
<th>Reason for Denial</th>
<th>Non-Latino</th>
<th>Latino</th>
<th>All Applicants</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>White</td>
<td>Black</td>
<td>Asian</td>
</tr>
<tr>
<td>Collateral</td>
<td>2</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Credit Application Incomplete</td>
<td>4</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Credit History</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Debt to Income Ratio</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Employment History</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Insufficient Cash</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Mortgage Insurance Denied</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Unverifiable Information</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Reason not Provided</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL DENIALS</td>
<td>10</td>
<td>0</td>
<td>4</td>
</tr>
</tbody>
</table>


NOTE: Some applications were denied for multiple reasons; thus, the total number of denial reasons reported are greater than the total number of loans denied.
HOUSING FOR PEOPLE WITH DISABILITIES

According to the U.S. Census Bureau, 19% of the population reported having a disability in 2010. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation’s housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.  

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

Modifications and assisted living arrangements tend to pose significant costs for the disabled population, which already experiences higher poverty rates compared to populations with no disability. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.

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Residential Patterns

El Centro and Imperial County both have disability rates higher than the overall U.S. and state of California disability rates, which are 12.9% and 11.0%, respectively (see Table 19). This indicates that El Centro may have a greater need for disability accessible housing than the average U.S. city.

In El Centro approximately 7,159 people have at least one disability, representing 16.3% of the population. Seniors (aged 65 and over) have a significantly higher disability rate than the rest of the population, with nearly half of all seniors experiencing at least one disability. In contrast, children aged 5-17 have a disability rate of 7.8% and adults aged 18 to 64 have a rate of 13.5%.

The most common disability type is an ambulatory difficulty, which impacts 9% of the population, followed by a cognitive disability at 7.8%. The only other disability type impacting more than 5% of the population is an independent living difficulty at 5.4%. Hearing, self-care, and vision difficulties impact between 3.2% and 4.2% of the population each.

<table>
<thead>
<tr>
<th>Disability Type</th>
<th>El Centro</th>
<th></th>
<th>Imperial County</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Hearing Difficulty</td>
<td>1,833</td>
<td>4.2%</td>
<td>5,635</td>
<td>3.3%</td>
</tr>
<tr>
<td>Vision Difficulty</td>
<td>1,409</td>
<td>3.2%</td>
<td>4,206</td>
<td>2.4%</td>
</tr>
<tr>
<td>Cognitive Difficulty</td>
<td>3,217</td>
<td>7.8%</td>
<td>9,929</td>
<td>6.3%</td>
</tr>
<tr>
<td>Ambulatory Difficulty</td>
<td>3,678</td>
<td>9.0%</td>
<td>13,744</td>
<td>8.7%</td>
</tr>
<tr>
<td>Self-Care Difficulty</td>
<td>1,557</td>
<td>3.8%</td>
<td>6,739</td>
<td>4.3%</td>
</tr>
<tr>
<td>Independent Living Difficulty</td>
<td>1,668</td>
<td>5.4%</td>
<td>9,198</td>
<td>7.6%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>7,159</strong></td>
<td><strong>16.3%</strong></td>
<td><strong>24,352</strong></td>
<td><strong>14.2%</strong></td>
</tr>
</tbody>
</table>

Source: 2018-2022 5-Year American Community Survey, Table S1810.
NOTE: All % represent a share of the total population within the jurisdiction or region. Total of numbers of each disability category may total to more than overall total, as some residents have multiple disabilities.
### Table 16. Disability by Age Group in El Centro and Imperial County

<table>
<thead>
<tr>
<th>Age of People with Disabilities</th>
<th>El Centro</th>
<th>Imperial County</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Age 5 to 17 with Disabilities</td>
<td>807</td>
<td>7.8%</td>
</tr>
<tr>
<td>Age 18 to 64 with Disabilities</td>
<td>3,316</td>
<td>13.5%</td>
</tr>
<tr>
<td>Age 65+ with Disabilities</td>
<td>3,013</td>
<td>49.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>7,159</td>
<td><strong>16.3%</strong></td>
</tr>
</tbody>
</table>

*Source: 2018-2022 5-Year American Community Survey, Table B18101.*

*NOTE: All % represent a share of the total population within the jurisdiction or region.

## Accessible Housing Supply and Affordability

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision / hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search for affordable elderly and special needs housing using HUD’s Resource Locator tool was conducted to identify affordable rental properties in El Centro designed to serve people with disabilities. The search returned six results; none of which have units specifically set aside for people with disabilities. Of the six, three had units specifically set aside for elderly residents. APSH data additionally reports that El Centro has one Section 202 unit available and no Section 811 units, and that Imperial County has a total of 38 Section 202 units available and no Section 811 units. Because there are fewer than 11 reported Section 202 households, APSH data suppresses demographic information to protect privacy and therefore no information is available about whether El Centro’s Section 202-unit household has a member with a disability.
Supportive housing, a typically subsidized long-term housing option combined with a program of wrap-around services designed to support the needs of people with disabilities, is another important source of housing for this population. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities. Based on a standard Supplemental Security Income (SSI) payment of $943 per month\(^{35}\) (equating to an affordable rent of $283 or less), it is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing, frequently relying on subsidized housing. However, despite having an unusually high disability rate, El Centro and the broader Imperial County both have no Section 811 units, or subsidized units designated for and accessible to disabled residents. This fact, coupled with El Centro’s average rent of over $1,200 per month for a one-bed unit, means that disabled residents may face extreme difficulty in finding affordable and accessible housing. This presents a barrier to fair housing choice for El Centro’s disabled population.

\(^{35}\text{https://www.ssa.gov/oact/cola/SSI.html}\)
Zoning and Accessibility

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government’s police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. This includes a local government’s affirmative obligation to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy housing. It also includes the affirmative obligation not to segregate housing for protected classes into lower-opportunity, less desirable areas of the jurisdiction. Even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities accept an obligation to set and implement standards and policies that protect and advance fair housing choice for all. Conditions of El Centro’s zoning codes affecting accessibility are assessed in the following sections. Several elements of the following analysis refer to the scored zoning code review in this report (Table 18 and Error! Reference source not found.).

Definition of “family” and group housing for persons with disabilities

One of the most often scrutinized provisions of a municipality’s zoning code is its definition of “family.” Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations behind the drafting of the jurisdiction’s definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

El Centro’s zoning code defines “family” in the following way:

Two (2) 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
Because of its explicit inclusion of disabled individuals living in residential care facilities or group homes, as well as its inclusion of families related by adoption or convenience, El Centro’s zoning code is more inclusive and supportive of disabled residents and of non-traditional family types than many similar zoning codes, particularly those for small towns. The code also contains the following definitions of residential care facilities, and further designates between small (6 or fewer residents) and large (7 or more residents) facilities:

*Residential care facility:* Various types of licensed and unlicensed facilities 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. Residential care facilities may include: 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, residential care facilities for the elderly.

Once again, the explicit inclusion of various types of care facilities under the definition of group home offers a certain level of support and protections to disabled residents that may not be available in other similar zoning codes. Small residential care facilities are permitted in all single-family zoned areas, and large residential care facilities are permitted in all residential zones except the Residential Airport Zone, or RAP zone.

Some restrictions exist on the development of large residential care facilities. These facilities must be located more than 300 feet from other such facilities, and developers must mail a notice of intent to construct the facility to all property owners located within 100 feet of the proposed site boundaries at least 10 days before any decision is finalized. The recipients of these notices may then request an administrative hearing to contest the construction within 15 days of receiving such a notice. If no affected party requests a hearing, construction may proceed without a hearing. Small residential care facilities have no such stipulations.

**Reasonable accommodations**

Adopting a reasonable accommodation ordinance is one specific way to address land use regulations’ impact on housing for persons with disabilities. Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or “to afford persons with a disability the equal opportunity to use and enjoy a dwelling.” (The requirements for reasonable accommodation under the
Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2). However, the FHA does not set forth a specific process that must be used to request, review, and decide a reasonable accommodation.

Because of El Centro’s generous definitions of “family” and “residential care facility”, and because such facilities may be developed in any residential zone other than an RAP zone without a hearing except in the case of an administrative hearing request by an impacted party, it is not typically necessary to seek a variance or special exception in order to construct such facilities. However, in the case that reasonable accommodation exceptions are required for construction or modification of existing facilities to accommodate disabled residents, the El Centro zoning code sets forth instructions specific to the reasonable accommodation process as follows:

- Any individual with a disability may submit a reasonable accommodation request in writing to the administrative committee. This request must include the name and address of the individual seeking accommodation, the name and address of the property and owner in question, a description of the requested accommodation, and a reason the accommodation is necessary. The administrative committee accepts reasonable accommodation requests at any time, and the City provides aid to any person needing assistance in submitting the request.

- The committee reviews and decides on applications within 30 days of receipt and must publish a written decision.

- An individual may appeal a decision on a reasonable accommodations request to the planning commission within 30 days of the decision.

**Supportive housing for persons recovering from alcohol or substance addiction**

Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a residential treatment program in a residential zone because it will serve individuals with alcohol or other drug problems or mental health disabilities. While housing for persons with disabilities may be subject to state and local regulations related to health and safety, they cannot be excluded from residential districts altogether, and such regulations must not be based on stereotypes or presumptions about specific types of disabilities.

In El Centro, supportive and transitional housing is explicitly permitted by right in all residential zones. The zoning code’s definition of “supportive housing” includes persons using such housing to “improve his or her health status”. In the absence of any
provisions specifically naming drug or alcohol treatment facilities, it is reasonable to assume that this definition encompasses such facilities.
PUBLIC SECTOR POLICIES

Zoning, Affordability, and Housing Choice

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. “The land use decisions made by a community shape its very character – what it’s like to walk through, what it’s like to drive through, who lives in it, what kinds of jobs and businesses exist in it, how well the natural environment survives, and whether the community is an attractive one or an ugly one.”

Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region’s potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan; define categories of permitted and special/conditional uses for those districts; and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts. In this way, local ordinances may define the type and density of housing resources

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37 Local government power to regulate land use derives from the State’s expressly delegated police power, first to municipal governments and then to counties, as found in the various enabling statutes of the state constitution and Official Code of Georgia Annotated. See O.C.G.A. § 36-66-1 et seq. (zoning authority cities). State law grants local municipalities authority to adopt and enact local comprehensive plans, but such plans are not intended to limit or compromise the right of the governing body of any county or municipality to exercise the power of zoning. See O.C.G.A § 36-70-5.
available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the California’s Fair Employment and Housing Act (FEHA), the federal FHA, the Americans with Disabilities Act, constitutional due process and equal protection). The FHA prohibits both private individuals and government authorities from denying a member of a protected class equal access to housing, including through the enforcement of a local zoning ordinance that disproportionately limits housing choice for protected persons. In Texas Department of Community Affairs v. The Inclusive Communities Project, a 2015 landmark disparate impact case under the FHA, the Supreme Court affirmed that part of the FHA’s central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions.

Besides intentional discrimination and disparate impact, discrimination on the basis of disability also includes:

[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling. FHA § 804(f)(3)(b).

This provision has been held to apply to zoning and land use decisions by local governments.

California’s fair housing protections contained within the Fair Employment and Housing Act (“FEHA”) (Cal. Gov. Code § 12900 - 12996) meet or exceed federal standards under the FHA. Accordingly, HUD has certified the FEHA as “substantially equivalent” to the substantive rights, procedures, remedies, and judicial review processes of the FHA, making California eligible for annual funding through the Fair Housing Assistance Program (FHAP) for fair housing enforcement activities and programs. The California Civil Rights Department (renamed as of July 1, 2022, from the previously named Dept. of Fair Employment and Housing), created by the state legislature and certified by HUD as a participating FHAP agency, partners with HUD to enforce federal and state fair housing laws.

City of El Centro Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing,
particularly multi-family housing, or that require large lot sizes or low-density that
deter affordable housing development by limiting its economic feasibility.

- Restrictive definitions of family that impede unrelated individuals from sharing a
dwelling unit.
- Placing administrative and siting constraints on group homes for persons with
disabilities.
- Restrictions making it difficult for residents with disabilities to locate housing in
certain neighborhoods or to modify their housing.
- Restrictions on occupancy of alternative sources of affordable housing such as
accessory dwellings, mobile homes, and mixed-use structures.

The City of El Centro’s treatment of these types of issues are explored and evaluated in
the tables and narrative below. The city’s latest available zoning ordinances were
reviewed and evaluated against a list of ten common fair housing issues. Taken
together, these issues give a picture of:

- The degree to which exclusionary zoning provisions may impact affordable
housing opportunities within those jurisdictions.
- The degree to which the zoning code may impact housing opportunities for
persons with disabilities.

The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten
issues and was then given an aggregate score calculated by averaging the individual
scores, with the possible scores defined as follows:

<table>
<thead>
<tr>
<th>Score</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Low Risk:</td>
<td>The provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and / or protects affordable housing and fair housing choice.</td>
</tr>
<tr>
<td>2 = Medium Risk:</td>
<td>The provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread.</td>
</tr>
<tr>
<td>3 – High Risk:</td>
<td>The provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.</td>
</tr>
</tbody>
</table>

The following table lists the ten issues reviewed and the city’s scores for each issue. A
complete report for each jurisdiction, including citations to relevant statutes, code
sections, and explanatory comments, is included as an appendix to this document.

### TABLE 18. ZONING RISK SCORES

<table>
<thead>
<tr>
<th>Issue</th>
<th>Risk Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</td>
<td>1</td>
</tr>
<tr>
<td>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</td>
<td></td>
</tr>
<tr>
<td>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</td>
<td>1</td>
</tr>
<tr>
<td>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</td>
<td></td>
</tr>
<tr>
<td>3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</td>
<td></td>
</tr>
<tr>
<td>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</td>
<td>1</td>
</tr>
<tr>
<td>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</td>
<td>1</td>
</tr>
<tr>
<td>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</td>
<td>1</td>
</tr>
</tbody>
</table>
6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?

<table>
<thead>
<tr>
<th>7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts?</th>
</tr>
</thead>
<tbody>
<tr>
<td>7b. Do multi-family districts restrict development only to low-density housing types?</td>
</tr>
</tbody>
</table>

| 8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)? |

<table>
<thead>
<tr>
<th>9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?</th>
</tr>
</thead>
<tbody>
<tr>
<td>9b. Is there any provision for monitoring compliance?</td>
</tr>
</tbody>
</table>

| 10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes? |

| Average Risk Score | 1.0 |

Our research has shown that restricting housing choice for certain historically / socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether the cities’ codes create a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD’s AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet
still fulfill the zoning objective of protecting the public’s health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the local regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

Impact of Zoning Provisions on Affordable Housing

Academic and market research have proven what also is intuitive: land use regulations can directly limit the supply of housing units within a given jurisdiction, and thus contribute to making housing more expensive, i.e. less affordable. Zoning policies that impose barriers to housing development and artificially limit the supply of housing units in a given area by making developable land and construction costlier than they are inherently can take different forms and may include: high minimum lot sizes, low density allowances, wide street frontages, large setbacks, low floor area ratios, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, low maximum building heights, restrictions against infill development, restrictions on the types of housing that may be constructed in certain residential zones, arbitrary or antiquated historic preservation standards, minimum off-street parking requirements, restrictions against residential conversions to multi-unit buildings, lengthy permitting processes, development impact fees, and/or restrictions on accessory dwelling units.

Where these zoning regulations are not congruent with the actual standards necessary to protect the health and safety of residents and prevent overcrowding, they may not be in express violation of fair housing laws but may nonetheless contribute to exclusionary zoning and have the effect of disproportionately reducing housing choice for moderate to low-income families, minorities, persons with disabilities on fixed incomes, families with children, and other protected classes by making the development of affordable housing cost prohibitive.

El Centro’s design standards, density allowances, and housing-type diversity, do not

---

appear facially exclusionary, and the City received “1 / low risk” scores for Issues 6 and 7 regarding exclusionary zoning regulations for single and multifamily housing types. While the zoning ordinance may impact the feasibility of developing affordable housing within some lower-density districts, thus creating a barrier to fair housing choice for some protected groups in some neighborhoods, the code provides for lot sizes and densities that could accommodate affordable housing somewhere within the residential districts.

The zoning code and map divide El Centro’s residential zones into: residential airport (RAP) rural residential (RR), single-family residential (R1), variable residential (R2), and multiple family residential (R3). The minimum lot size for single-family dwellings in R1 is 6,000 sq. ft., while the minimum lot size for single-family dwellings in R2 and R3 is 3,600 sq. ft. Attached or multi-family dwellings are subject to minimum lot sizes of 7,200 sq. ft. in R2 and R3 zones. Single-family dwellings in RR have much larger minimum lot areas at 21,780 sq. ft, and those in RAP have the largest at 43,560 sq. ft.

A review of the City of El Centro’s most current zoning map (see Figure 38) shows that large portions of the city are designated as R1 single-family residential, with most residential areas outside of the central city carrying this designation. R2 variable residential and R3 multiple family residential parcels are concentrated in the central and northern parts of the city, with only a handful of these parcels existing below Interstate 8. Given the increased density allowed in R2 and R3 zones, it seems as if there is a balance of housing types within the city.
FIGURE 38.
ZONING MAP OF EL CENTRO

Source: https://cityofelcentro.org/communitydevelopment/maps/
PUBLICLY SUPPORTED HOUSING

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing’s model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market. The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable, rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment
access, education quality, public safety, health, and recreation.\textsuperscript{39}

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing developments and residents utilizing housing vouchers to continue to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.\textsuperscript{40} The reasons for clustering of HCVs is more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.\textsuperscript{41} This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the study area.

\textbf{Supply and Occupancy}

Residents of the City of El Centro receive publicly supported housing through the Imperial Valley Housing Authority (IVHA). The IVHA offers public housing units as well as project-based and tenant-based housing choice vouchers (HCVs) to local residents. According to A Picture of Subsidized Housing, a HUD database on the supply of publicly supported housing, the IVHA manages 159 public housing units, 1,642 housing choice vouchers, and 145 project-based section 8 units in El Centro. On a broader scale, the IVHA manages 767 public housing units, 2,059 housing choice vouchers, 377 project-based Section 8 units, and 38 “Other Multifamily” units, which include elderly (Section 202) and disabled (Section 811) units throughout Imperial County.

Subsidized housing units are also available through the state’s Low Income Housing Tax Credit (LIHTC) program. The LIHTC program provides housing units to renters earning no more than 60% AMI. The City of El Centro has approximately 503 LIHTC units, 494 of which are identified as low-income units and may include the city’s project-based


Section 8 units. Bedroom size is listed for 494 of these units, indicating that the majority of LIHTC units in the city are 1-bedroom units (58%). 2-bedroom units make up 24% of LIHTC units in the city, while 3-bedroom units make up 15%. Only 3% of LIHTC units are 4-bedroom units, and no efficiency/studio units are listed in the city.

The LIHTC database identifies 3,467 LIHTC units in the county, of which 3,423 are currently low-income units. Bedroom size is listed for 3,042 of these units, of which 44% (1,121) are two-bedroom units, 35% (879) are one-bedroom units, 16% (404) are three-bedroom units, 3% (66) are efficiency units and 1% (25) are four-bedroom units.

### TABLE 19. HOUSING UNITS BY PROGRAM CATEGORY FOR EL CENTRO

<table>
<thead>
<tr>
<th>Housing Units</th>
<th>El Centro City</th>
<th>Imperial County</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>TOTAL HOUSING UNITS</td>
<td>13,958</td>
<td>56,907</td>
</tr>
<tr>
<td>Public Housing</td>
<td>159</td>
<td>1.1%</td>
</tr>
<tr>
<td>HCV Program</td>
<td>795</td>
<td>5.7%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td>145</td>
<td>1.0%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>LIHTC Program</td>
<td>503</td>
<td>3.6%</td>
</tr>
</tbody>
</table>

Source: 2018-2022 ACS 5-Year Estimates; 2022 A Picture of Subsidized Housing; HUD User LIHTC Database.

Table 20 below shows the racial/ethnic composition of publicly supported housing residents, as well as estimates for the numbers of low-to-moderate income households in the city. Very low-income households (households earning less than 30% AMI) are often the primary recipients of publicly supported housing types.

Looking at El Centro’s very low-income households, nearly 90% of these households are Hispanic. However, this is similar to their share of the city’s general population (88%). White households, on the other hand, make up 42% of the city’s low-income population but only 7% of the general population, suggesting that this group has disproportionately high rates of low-incomes in El Centro. The makeup of Black and Asian/Pacific Islander low-income households is similar, if not slightly less than, their share of the overall population.

Hispanic households comprise the greatest shares of households living in the city’s publicly supported housing units by large margins. According to APSH data, approximately 94% of HCV holders, 99% of Project-Based Section 8 residents, and 97% of public housing residents are Hispanic. As such, Hispanic households are considered overrepresented in El Centro’s publicly supported housing, while other races and ethnicities are underrepresented.
White households make up 1% of public housing residents and 3% of HCV holders. Black households make up 2% of public housing residents and 2% of HCV holders. Asian or Pacific Islander households comprise the smallest shares of subsidized housing, comprising only 1% of public housing residents and 1% of HCV holders.
### TABLE 20. PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE / ETHNICITY

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>RACE / ETHNICITY</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>White</td>
<td>Black</td>
<td>Hispanic</td>
<td>Asian / Pacific Islander</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>EL CENTRO CITY</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Housing</td>
<td></td>
<td>2</td>
<td>1.2%</td>
<td>3</td>
<td>2.0%</td>
<td>163</td>
<td>97.0%</td>
<td>2</td>
<td>1.2%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td></td>
<td>0</td>
<td>0.0%</td>
<td>1</td>
<td>0.7%</td>
<td>144</td>
<td>99.3%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td></td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>HCV Program</td>
<td></td>
<td>29</td>
<td>3.0%</td>
<td>19</td>
<td>2.0%</td>
<td>899</td>
<td>94.0%</td>
<td>10</td>
<td>1.0%</td>
</tr>
<tr>
<td>0 to 30% AMI</td>
<td></td>
<td>1,000</td>
<td>42.0%</td>
<td>55</td>
<td>2.3%</td>
<td>2,130</td>
<td>89.5%</td>
<td>10</td>
<td>0.4%</td>
</tr>
<tr>
<td>0 to 50% AMI</td>
<td></td>
<td>1,069</td>
<td>25.3%</td>
<td>274</td>
<td>6.5%</td>
<td>3,645</td>
<td>86.3%</td>
<td>49</td>
<td>1.2%</td>
</tr>
<tr>
<td>0 to 80% AMI</td>
<td></td>
<td>1,229</td>
<td>15.9%</td>
<td>403</td>
<td>5.2%</td>
<td>5,450</td>
<td>70.6%</td>
<td>68</td>
<td>0.9%</td>
</tr>
<tr>
<td>TOTAL HOUSEHOLDS</td>
<td></td>
<td>1,475</td>
<td>12.6%</td>
<td>440</td>
<td>3.7%</td>
<td>9,515</td>
<td>81.0%</td>
<td>290</td>
<td>2.5%</td>
</tr>
<tr>
<td>IMPERIAL COUNTY</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public Housing</td>
<td></td>
<td>15</td>
<td>2.0%</td>
<td>8</td>
<td>1.0%</td>
<td>744</td>
<td>97.0%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Project-Based Section 8</td>
<td></td>
<td>15</td>
<td>4.0%</td>
<td>8</td>
<td>2.1%</td>
<td>362</td>
<td>97.1%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Other Multifamily</td>
<td></td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
<td>38</td>
<td>100.0%</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>HCV Program</td>
<td></td>
<td>31</td>
<td>1.6%</td>
<td>15</td>
<td>0.8%</td>
<td>1,832</td>
<td>93.0%</td>
<td>8</td>
<td>0.4%</td>
</tr>
<tr>
<td>0 to 30% AMI</td>
<td></td>
<td>3,535</td>
<td>36.8%</td>
<td>345</td>
<td>3.6%</td>
<td>8,385</td>
<td>87.3%</td>
<td>85</td>
<td>0.9%</td>
</tr>
<tr>
<td>0 to 50% AMI</td>
<td></td>
<td>4,590</td>
<td>27.0%</td>
<td>654</td>
<td>3.9%</td>
<td>14,250</td>
<td>83.9%</td>
<td>135</td>
<td>0.8%</td>
</tr>
<tr>
<td>0 to 80% AMI</td>
<td></td>
<td>5,640</td>
<td>18.4%</td>
<td>869</td>
<td>2.8%</td>
<td>20,715</td>
<td>67.6%</td>
<td>220</td>
<td>0.7%</td>
</tr>
<tr>
<td>TOTAL HOUSEHOLDS</td>
<td></td>
<td>7,315</td>
<td>16.0%</td>
<td>1,195</td>
<td>2.6%</td>
<td>35,885</td>
<td>78.4%</td>
<td>790</td>
<td>1.7%</td>
</tr>
</tbody>
</table>

Source: 2016-2020 CHAS, Tables 1 and 9; 2022 APSH.

NOTE: Data presented are number of households, not individuals. Percentages may not add up to 100% due to the suppression of the “Other (including multiple races, non-Hispanic) race/ethnicity category, which is included in the total household count.
Geography of Supported Housing

The map that follows shows the locations of publicly supported housing developments and voucher use within the City of El Centro. Conventional public housing developments in the city are highly clustered within the R/ECAP, located in Downtown El Centro, north of W Main St and east of the Southern Pacific Railroad.

The two public housing developments here include Fairfield Homes (117 total units) and Orangewood Homes (117 total units). Other publicly supported housing developments located within the R/ECAP tract include a Section 202 Supportive Housing for the Elderly Program development, Cedar Homes (19 total units) and several LIHTC developments.

The city’s Project-Based Section 8 developments are located to the west of the R/ECAP, with three (3) located on N Waterman Ct. Valley Apartments #1, #2, and #3, providing a total of 86 units combined. Another Project-Based Section 8 development, Euclid Villas (42 total units), is located on W Euclid Ave. There is also a LIHTC development, Imperial Gardens Family Apartments (77 total units), on the opposite side of this street.

The map also provides information on the number of Housing Choice Vouchers within each census tract in the city. HCV usage is highest within the city’s R/ECAP, with a total of 274 vouchers used in this tract. Voucher usage is second highest in the tract immediately west of the R/ECAP, tract 112.02, with a total of 215 vouchers. As shown, voucher use is concentrated in the central and northern areas of the city, while tracts on the southern edges of the city limits contain only 1-3 vouchers.
FIGURE 39.
PUBLICLY SUPPORTED HOUSING IN EL CENTRO

Source: 2022 A Picture of Subsidized Households (APSH),
https://www.huduser.gov/portal/datasets/assthsg.html#2009-2021_data
Policies and Procedures

The Imperial Valley Housing Authority (IVHA) Administrative Plan sets policy for who may be housed through project-based or tenant-based vouchers, serving the jurisdictions of the City of Brawley, City of Calipatria, City of El Centro, City of Holtville, City of Imperial, City of Westmorland and the County of Imperial. Four aspects of the administrative plan are examined here: tenant selection, local preference, tenant screening, and subsidy standards. The application of these policies is central to matters of fair housing choice.

Tenant Selection
To be eligible for admission in the IVHA’s public housing units and housing choice voucher program, an applicant household must meet several criteria: (1) income at or below HUD income limits, (2) fall under the HUD and PHA definition of “family,” (3) provide accurate social security numbers for all household members, (4) qualify on the basis of citizenship or eligible immigrant status, (5) provide social security number information for household members as required; and (6) consent to the PHA collecting certain data for tenant screening.

In its Admin Plan, the IVHA defines “family” using HUD’s definition of Family, which includes “a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together.” This broad definition is extended to include “a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family.”

The IVHA maintains one waiting list for HCV assistance. Depending upon the length of time that applicants are expected to wait to receive assistance, the PHA may use a one- or two-step application process. The entire application process complies with HUD’s accessibility standards, which stipulates that the application must be accessible to persons with disabilities, certain elderly individuals, and persons with limited English proficiency (LEP).

- A one-step process is used when it is expected that a family will be selected from the waiting list within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.
- A two-step process is used when it is expected that a family will not be selected from the waiting list for at least 60 days from the date of application. The PHA initially will require families to provide only the information needed to make an
initial assessment of the family’s eligibility, and to determine the family’s placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

**Tenant Screening**

To screen all applicants, the IVHA performs criminal background checks and checks the National Sex Offender database to screen applicants for admission. The IVHA does not conduct additional screening to determine an applicant’s suitability as a tenant—this is the responsibility of the unit’s owner.

**Local Preferences**

In selecting applicants from the waiting list, PHAs are permitted to establish local preferences. The IVHA maintains the following local preference policies, where each preference receives an allocation of points. The more preference points an applicant has, the higher the applicant’s place on the waiting list.

- Residency preference for families who live, work, or have been hired to work in the jurisdiction *(1 point)*
- Veteran’s preference is available to a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable or surviving spouses of veterans *(1 point)*
- Graduates of Transitional Housing Program preference for families who have graduated from transitional housing programs for homeless and victims of domestic violence funded by the government *(3 points)*
- Involuntary Displacement for families who claim they are being displaced due to either a Federally declared disaster such as fire (not caused by the applicant or applicant’s family or guest), earthquake or flood or government action within IVHA’s jurisdiction *(3 points)*
- Foster youth preference for emancipated foster youth 18 years of age being displaced as identified by the Imperial County Department of Social Services *(3 points)*

**Subsidy Standards**

The PHA must establish subsidy standards that determine the appropriate number bedroom unit size for a variety of family sizes and compositions. IVHA’s policy is as
follows:

- One bedroom will be assigned for every two persons within the household.
- An additional bedroom for a live-in-aide will not be authorized unless there is an approved reasonable accommodation request for a separate bedroom for the resident.

The following table is referenced in determining the appropriate unit size for a family.

<table>
<thead>
<tr>
<th>Voucher Size</th>
<th>Persons in Household (Minimum – Maximum)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>1-2</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>2-4</td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>3-6</td>
</tr>
<tr>
<td>4 bedrooms</td>
<td>4-8</td>
</tr>
<tr>
<td>5 bedrooms</td>
<td>6-10</td>
</tr>
</tbody>
</table>

*Source: Imperial Valley Housing Authority Administrative Plan 2022.*

Exceptions to these subsidy standards may be granted to persons with disabilities who require exceptions as a reasonable accommodation.
FAIR HOUSING ACTIVITIES

Fair Housing Resources
California’s fair housing protections contained within the Fair Employment and Housing Act ("FEHA") meet or exceed federal standards contained within Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, (the "Fair Housing Act" or "FHA"). Accordingly, HUD has certified the FEHA as “substantially equivalent” to the substantive rights, procedures, remedies, and judicial review processes of the FHA, which makes California eligible for annual funding through the Fair Housing Assistance Program (FHAP) for fair housing enforcement activities and programs. The California Civil Rights Department (formerly known as the Department of Fair Employment and Housing) created by the state legislature and certified by HUD as a participating agency, partners with HUD to enforce federal and state fair housing laws.

Fair Housing Education and Enforcement Resources
Under its Fair Housing Initiatives Program (FHIP), HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

The Inland Fair Housing Mediation Board (IFHMB) is a private, nonprofit agency that offers fair housing services, landlord/tenant mediation, housing counseling, alternative dispute resolution, and senior services to residents of San Bernardino County and parts of Riverside and Imperial Counties. It is located in the City of Ontario, CA, with satellite offices in Victorville and El Centro.

Fair Housing Complaints
Complaints Filed with HUD
Region IX of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout California (as well as Arizona, American Samoa, Guam, Hawaii, and Nevada). The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To
achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

The San Francisco Regional Office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in El Centro for the period January 1, 2019, through December 31, 2023. For the requested time period, HUD received 0 alleged housing discrimination affecting aggrieved persons or subject properties in El Centro. HUD received 1 complaint located in Imperial County but outside of the City of El Centro in August 2022 on the basis of national origin.

**Complaints Filed with the California Civil Rights Department**

The California Civil Rights Department (CRD) is the State of California’s Fair Housing Assistance Program (FHAP) agency for fair housing enforcement actions. For the requested time period, the CRD received a total of 4 fair housing complaints within El Centro.

<table>
<thead>
<tr>
<th>Filing Year</th>
<th>Bases</th>
<th>Alleged Issues</th>
<th>Disposition</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>Disability, retaliation</td>
<td>Failure to make reasonable accommodation</td>
<td>Conciliation/settlement successful</td>
</tr>
<tr>
<td>2021</td>
<td>Race, disability</td>
<td>Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation</td>
<td>No cause determination</td>
</tr>
<tr>
<td>2022</td>
<td>Familial status</td>
<td>Discriminatory terms, conditions, privileges, or services and facilities</td>
<td>No cause determination</td>
</tr>
<tr>
<td>2022</td>
<td>Disability</td>
<td>Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation</td>
<td>Conciliation/settlement successful</td>
</tr>
</tbody>
</table>

**Local Complaints**

El Centro residents may also file fair housing complaints with the Inland Fair Housing & Mediation Board (IFHMB). Conversations with IFHMB staff revealed that disability remains
the most common basis for fair housing complaints. Table 23 below shows that from FY2018-FY2024, 61% (17 out of 28) of all complaints filed with IFHMB were on the basis of disability.

### TABLE 23. IFHMB COMPLAINTS IN EL CENTRO, 2018-2024

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
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</tr>
<tr>
<td>Religion</td>
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<td>0</td>
</tr>
<tr>
<td>Sex</td>
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<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Sexual Orientation</td>
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<td>0</td>
<td>0</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Source of Income</td>
<td>0</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td><strong>5</strong></td>
<td><strong>7</strong></td>
<td><strong>9</strong></td>
<td><strong>2</strong></td>
<td><strong>4</strong></td>
<td><strong>1</strong></td>
</tr>
</tbody>
</table>

**Past Fair Housing Goals and Related Activities**

The City of El Centro completed its last Analysis of Impediments to Fair Housing Choice in 2019, which identified several goals to focus on over the course of 2019 to 2024. TABLE 24 below is a reproduction of the goals presented in the 2019-2024 AI, along with an updated column detailing what progress has been made on each goal since the implementation of the previous AI.
### TABLE 24. ASSESSMENT OF PAST FAIR HOUSING GOALS AND ACTIONS

<table>
<thead>
<tr>
<th>2019-2024 Impediment(s) Identified</th>
<th>Proposed Actions</th>
<th>Progress Made</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 8 Householders Disproportionately Reside in Neighborhood with a High Poverty Rate</td>
<td>Continue to actively encourage families to seek housing in neighborhoods with low concentrations of low-income families</td>
<td>The City partnered with a developer for the construction of the El Dorado Family Apartments, an affordable housing development completed in 2021. Although this development is located adjacent to an apartment complex with affordable housing units, it is also located across the street from a new, larger apartment development that is considered to be “luxury” apartments with no affordability restrictions.</td>
</tr>
<tr>
<td>On-Site Property Managers are Not Fully Aware of Fair Housing Laws</td>
<td>The IVHA will prepare a guide for landlords and owners and upload it to its website</td>
<td>The guide is available on the Housing Authority’s website. However, it has not been supplemented with information on property management practices that affirmatively further fair housing as recommended in the AI. The City will continue encourage the IVHA to supplement the information in their program guide.</td>
</tr>
<tr>
<td>Senior Housing Standards are not Consistent with Federal Law on Housing for Older Persons</td>
<td>The Zoning Ordinance should be updated to mirror the senior age thresholds provided by Section 51.3.</td>
<td></td>
</tr>
<tr>
<td>Lack of Special Provisions for Making Housing Accessible to Persons with Disabilities</td>
<td>The Community Development Department will explore the potential adoption of a Universal Design Ordinance</td>
<td>In order to increase an understanding of accessibility requirements, the Economic Development Division will continue to post the</td>
</tr>
</tbody>
</table>

2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
Housing Discrimination | 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. A greater community awareness of Inland may result in a higher number of families expressing their right to file a housing discrimination complaint.

The City of El Centro continues to provide information on IFHMB’s services on City web pages.

IFHMB conducted six fair housing workshops in English and Spanish to the community, three (3) in Spanish and three (3) in English. A total of eighty (80) attendees received fair housing and landlord/tenant education. The webinars provided information on the Federal and State fair housing laws with an emphasis on fair housing rights including information regarding race discrimination, national origin discrimination, identifying possible steering regarding rental or home purchases, disability discrimination, the reasonable accommodation and modification process, how to recognize and report discrimination, fair housing rights and responsibilities, sex discrimination, and the fair housing services provided by IFHMB.

Mortgage Lending Practices | 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.

The City of El Centro is working with IFHMB to ensure that these services are covered by their current service contract. If not included, the contract will be amended to incorporate the services.
| Ill-Informed Property Management Practices | 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 | The City of El Centro is working with IFHMB to ensure that this service is incorporated into their Professional Services Agreement. |
<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Distribute information on the above and other topics and distribute it to the apartment managers of all small, medium and large apartment complexes.</td>
<td></td>
</tr>
</tbody>
</table>
IDENTIFICATION OF IMPEDIMENTS

Described below are the fair housing impediments identified in this Analysis of Impediments to Fair Housing Choice, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address priority contributing factors are provided in the table that follows, along with associated activities, goals, timelines, and responsible parties.

Impediment #1: Low Wages Impede Access to Opportunities, Resources, and Restrict Housing Choice for Low/Mod Income Households and Protected Classes

Disparities in labor market engagement exist by geography, race, and ethnicity in El Centro. Unemployment is highest among Native American residents (over 50% as of the 2018-2022 ACS estimates), and the share of residents aged 25 and over with a bachelor’s degree or higher is lowest among Black residents (less than 1.1%). Educational attainment is lowest in the RECAPs tract in the city as well as the northern portion of the city, where unemployment is also the highest. Median household incomes in El Centro are lowest in the central portion of the city within and around the RECAPs tract, where they fall below $40,000 in two census tracts. Residents and stakeholders noted that in addition to income, residents’ housing choices are shaped by a variety of factors, including access to grocery stores, healthcare, and other needed resources; access to public transportation; and availability of public infrastructure such as sidewalks.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages and connections to the training necessary to obtain them, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and
In particular, there is a high need for investment in public schools throughout all of El Centro. The majority of the public schools' students are over 90% minorities with more than 60% coming from economically disadvantaged backgrounds. Based on the percentage of overall performance levels, the majority of schools have more than a quarter of students who have not met their performance standards. Funding for programs that provide collaborative, integrated support for students can help increase access to proficient schools for residents who may lack the opportunity to move to higher-performing schools or zones. The City of El Centro and Imperial County leadership must collaborate on coordinating community school services and distribution of resources and support throughout the district.

In addition to investing in workforce development, the City can continue to use CDBG, bond referendum, or other funding to collaborate on projects that develop, expand, or improve community spaces and programming, increase access to fresh food retailers, provide access to health and wellness resources and services, improve housing condition, and support development of needed retail and services in low- and moderate-income census tracts.

**Impediment #2: Limited Supply of Affordable Housing for Low/Mod Income Households**

A general lack of affordable housing options available to low- and moderate-income households was one of the most frequently cited issues identified in our conversations with El Centro community stakeholders. This shortage has become increasingly dire over the past few years as housing costs in the area have drastically increased and wages have remained comparatively stagnant. Additionally, there is limited public housing assistance, and existing resources are often coupled with waitlist periods of 1 year or more, source of income discrimination by area landlords, and housing quality issues. There is a great need for increased numbers of affordable multifamily units and assistance for low-income homebuyers.

According to 2022 ACS data, housing in El Centro and Imperial County is predominantly comprised of single-family detached structures (around 55.4% and 63.2%, respectively, See Table 8: Housing Units by Structure Type). The lack of structures with multiple units decreases the availability of housing affordable for low-moderate income earning households who cannot afford to purchase single family homes. Apartments and smaller units are also essential for many seniors and residents with disabilities.

Affordability is a problem affecting both owner and renter households in El Centro. The 2023 Fair Market Rent for a 1-bedroom unit in El Centro is $904 (See Figure 35). To afford...
a $904 1-bedroom unit, a household would need to work a 45-hour week with a minimum wage of $17.38. However, the minimum wage in El Centro is only $15.50, which would require a 58-hour work week to afford a $904 lease. Based on these estimates, no units in the County or El Centro would be considered affordable to an individual working 40 hours per week at minimum wage.

An estimated 12.8% of households in El Centro are severely cost-burdened, spending over 50% of income on housing. (See Table 12: Demographics of Households with Severe Housing Cost Burdens). Black households are the most impacted by severe cost burdens (27.3%, or 120 of 440 Black households). Hispanic households are the second group most impacted by severe cost burdens with a rate of 15.9% (1,510 of 9,515 Hispanic households). Additionally, 15.4% of small-family households and 10.6% of non-family households are severely cost burdened in El Centro.

Impediment #3: Aging Housing Stock in Need of Repair and Rehabilitation

Data shows that El Centro’s housing stock is aged overall – less than 20% of the City’s housing is under 20 years old, while 65% is more than 40 years old. A city with aged housing stock typically has a greater need for rehabilitation and repair programs and funding than a city with newer housing stock. Additionally, homes built before 1979, or about 47% of El Centro’s homes, present a high risk of lead exposure and a need for lead abatement and education programs. Without these programs, housing problems may disproportionately impact low-income and historically disadvantaged communities.

Forty percent (40%) of El Centro households experience one or more HUD-defined housing problem. In El Centro, race and ethnicity greatly impact a household’s likelihood of experiencing one or more problems. Nearly 90% of Black households in El Centro experience at least one housing problem, in comparison to less than one quarter of white households. Nearly half of all Hispanic households experience one or more housing problems. When negative factors in housing disproportionately impact protected classes, such as racial or ethnic groups, this constitutes a barrier or impediment to fair housing choice.

Impediment #4: Disparities in Access to Community Resources and Services

In many cities, a person’s location within the city impacts the resources they are able to access. Neighborhoods without equal access to resources may present a barrier or impediment to fair housing choice when residents of a city are limited to such
neighborhoods by financial or other circumstances.

In El Centro, several areas have limited community resources in comparison to the rest of the City. In particular, two census tracts in northern El Centro, including the City’s only R/ECAP tract, have a median household income lower than $40,000 per year despite having some of the City’s highest concentration of jobs. In this same R/ECAP tract, along with one tract in western El Centro, more than 10% of residents do not have access to a vehicle. In several tracts in central El Centro, including the R/ECAP tract, 30-40% of residents are considered to fall within low income-low food access group, meaning that they are considered low-income and live more than one-half mile from a supermarket; in one tract in northeastern El Centro, this number is greater than 40%. This low-food-access portion of the City also overlaps with areas where a significant portion of residents do not have vehicle access, which intensifies food access issues. Finally, El Centro contains five census tracts in which more than 8% of residents do not have health insurance, including the City’s only R/ECAP tract. These tracts also represent some of the lowest median household incomes in the City, meaning that it is likely that residents of these tracts work low-wage part-time hourly jobs that do not provide health insurance. As Imperial County as a whole has been designated as a medically underserved area since the 1990s, a lack of access to health insurance has the potential to greatly intensify overall healthcare access issues.

In combination, these factors have the potential to severely limit a person’s housing choice and therefore their access to resources. Many of these resource access issues affect the same census tracts, therefore compounding each other. A person living in a tract with lower rates of health insurance is less likely to have a vehicle, meaning that they may be forced to remain in the same neighborhood in order to be within walking distance of a low-wage job, and may be unable to access higher-wage jobs with better benefits, such as health insurance, due to lack of transportation. As many of these access issues overlap in El Centro’s only R/ECAP tract, which is primarily occupied by Black and Hispanic residents, it is clear that resource access issues within the City disproportionately impact protected class groups and therefore constitute an impediment to fair housing choice.

**Impediment #5: Limited Housing Options for Persons With Disabilities**

According to 2018-2022 ACS 5-Year Estimates, approximately 16.3% of the population in El Centro has at least one disability. This rate is higher than the overall disability rate in California (11.0%) and Imperial County (14.2%), suggesting that El Centro has a particular need for accessible housing suitable for persons with disabilities, who often have specialized housing needs. In addition, as persons with disabilities often live on limited incomes, such as standard Supplemental Security Income (SSI) payments,
affordability is a key concern. This issue is further exacerbated by El Centro’s high housing costs, as those living on fixed incomes—often receiving less than $1,000 per month, according to average SSI estimates—are unlikely to be able to afford market-rate housing in the city, where 1-bedroom units rent for approximately $1,500 a month, according to ACS estimates.

As such, publicly supported housing plays a key role in providing persons with disabilities with affordable, accessible housing options. However, a review of HUD’s most recent A Picture of Subsidized Housing (APSH) data reveals that there are only two (2) Section 202 unit for seniors (Boatwright Homes and Cedar Homes) and no Section 811 units for persons with disabilities within El Centro. Disability was also the most cited basis among fair housing discrimination complaints in El Centro. The city’s overall lack of housing options tailored towards persons with disabilities, along with patterns of housing complaints suggests that this protected class faces distinct barriers to fair housing choice.

Impediment #6: Need for Continued and Expanded Fair Housing Activities

Knowledge of fair housing rights and resources is generally good in the City of El Centro. Stakeholders noted that over the past decade, local knowledge about fair housing has improved dramatically, and residents who did not know how to file a fair housing complaint were referred to the appropriate organization. According to our stakeholder fair housing questionnaire results, professionals in the real estate, mortgage, and development industries seem to have a strong understanding of fair housing protections. However, conversations with stakeholders also revealed that discrimination in housing still occurs in the area. Barriers to housing often include factors such as poor credit history, 3x or more minimum income requirements, and source of income discrimination, which is prohibited under California law (FEHA).

These results indicate that while ongoing education efforts within the community have been successful, there is a continuing need to provide fair housing education and resources. The diversity of the city’s population suggests that this fair housing education should be targeted to communities of color and people with limited English proficiency.

Strengthening of connections between the City of El Centro and its fair housing service providers (like IFHMB) with local organizations that serve groups known to be vulnerable to housing discrimination, such as El Centro Hispano.
## TABLE 25. FAIR HOUSING GOALS AND ACTIVITIES

<table>
<thead>
<tr>
<th>Contributing Factors</th>
<th>Recommended Activities</th>
<th>Responsible Parties and Partners</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IMPEDIMENT #1: LOW WAGES IMPEDE ACCESS TO OPPORTUNITIES, RESOURCES, AND RESTRICT HOUSING CHOICE FOR LOW/MOD INCOME HOUSEHOLDS AND PROTECTED CLASSES</strong></td>
<td><strong>Continued need for professional job training and workforce development</strong></td>
<td>Collaborate with key stakeholders on implementing workforce development goals and strategies including eliminating the education achievement gap, and funding increased access to quality public goods and services, including transportation, housing, food access and affordability, quality childcare and digital broadband access</td>
</tr>
<tr>
<td></td>
<td><strong>Overall low wages throughout the city of El Centro with multiple tracts where households are low income</strong></td>
<td>Work with community partners to support resident and employer participation in job search, placement, and training programs. In particular, expand paid job training programs</td>
</tr>
<tr>
<td></td>
<td><strong>Low access to healthy foods, healthcare, and high performing schools</strong></td>
<td>Collaborate with residents and community partners to understand barriers to accessing job training programs and employment, and continue to develop and fund strategies to address these barriers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Invest/expand job training and placement initiatives for individuals with LEP to increase their self-sufficiency and housing stability</td>
</tr>
<tr>
<td><strong>Majority of schools in El Centro are underperforming</strong></td>
<td>Partner with Imperial County Public Schools, community stakeholders, and others to provide facilities, resources, and services to students attending lower-performing schools. These may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, programs to increase food security and access, support for ESL students and students with disabilities, resources for students experiencing homelessness or who are part of economically disadvantaged households, and other resources and services.</td>
<td>City of El Centro</td>
</tr>
<tr>
<td></td>
<td><strong>High concentration of minority populations, particularly Hispanic/Latino, throughout the city</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Imperial County Public School District</td>
</tr>
</tbody>
</table>
## IMPEDIMENT #2: LIMITED SUPPLY OF AFFORDABLE HOUSING FOR LOW/MOD INCOME HOUSEHOLDS

<table>
<thead>
<tr>
<th>Contributing Factors</th>
<th>Recommended Activities</th>
<th>Responsible Parties and Partners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rents are increasing and over 13% of households are cost burdened</td>
<td>Continue to review the Annual Qualified Allocation Plans issued by the California Tax Credit Allocation Committee under the Low Income Housing Tax Credit (LIHTC) program to identify local government policies or actions that may positively impact the competitiveness of developers’ applications</td>
<td>City of El Centro</td>
</tr>
<tr>
<td></td>
<td>Consider and adopt zoning code amendments that could increase possibilities for development of affordable housing</td>
<td>Imperial Valley Housing Authority (IVHA)</td>
</tr>
<tr>
<td></td>
<td>Convene a focus group of local affordable housing developers to identify challenges to working in the region, and develop strategies to address these barriers</td>
<td>Area affordable housing developers</td>
</tr>
<tr>
<td></td>
<td>Assess the need for publicly supported housing and opportunities to expand housing options</td>
<td></td>
</tr>
</tbody>
</table>

## IMPEDIMENT #3: AGING HOUSING STOCK IN NEED OF REPAIR AND REHABILITATION

<table>
<thead>
<tr>
<th>Contributing Factors</th>
<th>Recommended Activities</th>
<th>Responsible Parties</th>
</tr>
</thead>
</table>
| Aging housing stock                                                                  | Gather data and produce a report on factors impacting the lack of new housing built in El Centro in the past twenty years
  • Using this report, create a plan to encourage the development of new housing within the jurisdiction | City of El Centro |
| Disproportionate impact of housing problems on protected class groups                 | Create or expand rehab and repair programs targeting traditionally Black and Hispanic communities, as well as neighborhoods with low median household incomes |                                 |
| Existing affordable units are in need of rehabilitation                              | Continue to support the rehabilitation of existing affordable housing options through the City’s Housing Rehabilitation Program, providing outreach to affected homeowners |                               |
| Contributing Factors                                                                 | Recommended Activities                                                                                                                                                                                                                                                                                                                                 | Responsible Parties and Partners                                                                 |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| **IMPEDIMENT #4: DISPARITIES IN ACCESS TO COMMUNITY RESOURCES AND SERVICES**       |                                                                                                                                                                                                                                                                                                                                                         |
| **Low median household income concentrated in certain areas of the city**         | - Create or expand job training and employment assistance programs in areas of the city with low median household income  
- Create or expand upward mobility and financial education and assistance programs in areas of the city with low median household incomes  
- Expand bus routes and operational hours in areas of the city with low vehicle access rates  
- Investigate the potential to expand subsidized rideshare programs for non-disabled residents in areas of the city with low vehicle access rates  
- Ensure that bus routes throughout the city provide easy access to supermarkets and that operational hours allow residents to grocery shop after work or on the weekends  
- Produce a report on steps the city could take to encourage the development of new supermarkets in low-access areas | City of El Centro  
Local job training and employment assistance programs  
Imperial Valley Transit |
| **Lack of vehicle access concentrated in certain areas of the city**               |                                                                                                                                                                                                                                                                                                                                                         |
| **Lack of food access concentrated in certain areas of the city**                 |                                                                                                                                                                                                                                                                                                                                                         |
| **IMPEDIMENT #5: LIMITED HOUSING OPTIONS FOR PERSONS WITH DISABILITIES**          | - Partner with the Imperial Valley Housing Authority and the California Housing Finance Agency to explore potential funding opportunities for affordable, accessible housing that meets the needs of persons with disabilities, such as the Section 811 program | City of El Centro  
Imperial Valley Housing Authority  
California Housing Finance Agency (CalHFA) |
<table>
<thead>
<tr>
<th>Contributing Factors</th>
<th>Recommended Activities</th>
<th>Responsible Parties and Partners</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMPEDIMENT #5: LIMITED HOUSING OPTIONS FOR PERSONS WITH DISABILITIES (CONT.)</td>
<td>Convene a focus group comprised of local disability advocacy and supportive service providers to gain a deeper understanding of the unique challenges and issues that residents with disabilities face in El Centro’s housing landscape</td>
<td>Local disability advocacy and supportive service providers</td>
</tr>
<tr>
<td>Disability remains the most common basis for fair housing complaints in the area</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IMPEDIMENT #6: NEED FOR CONTINUED AND EXPANDED FAIR HOUSING ACTIVITIES</td>
<td>Continue to offer fair housing education activities, with a focus on expanding the pool of partners the City and IFHMB works with (ex: LEP communities/organizations, disability advocacy and supportive service providers, schools, etc.) to ensure meaningful connections are established with vulnerable populations</td>
<td>City of El Centro Inland Fair Housing Mediation Board (IFHMB) Mercy Housing California Civil Rights Department (CRD)</td>
</tr>
<tr>
<td>Continuing need to support existing fair housing activities</td>
<td>Collaborate with property managers and landlords to ensure that they have an understanding of property management practices that affirmatively further fair housing</td>
<td></td>
</tr>
<tr>
<td>Need to expand fair housing activities and education</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Source of income discrimination, prohibited under FEHA, still occurs</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX I: CITIZEN PARTICIPATION RECORD

Council Meeting Flyer
Council Agenda
Council Resolution
Social Media Posts
Newspaper Article
Meeting Presentation Slides
Stakeholder Survey
JUNTA DEL CONSEJO
EN VIVO • 2 DE ABRIL A LAS 6:00PM

CONÉCTESE POR ZOOM
Phone Number: 1 (669) 900-6833
Meeting ID: 418 037 5132
Passcode: 5iHJYM

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facebook:/ElCentroCA  /CityofElCentro
youtube:@ElCentroCityHall
AGENDA
CITY OF EL CENTRO
CITY COUNCIL/CITY COUNCIL AS SUCCESSOR AGENCY TO THE REDEVELOPMENT AGENCY/SUCCESSOR HOUSING AGENCY
TUESDAY, APRIL 2, 2024

Economic Development Department Joint Regular Meeting 11:30 AM

ECONOMIC DEVELOPMENT DEPARTMENT
1249 MAIN STREET
EL CENTRO, CA 92243

The public may attend in person. Any member of the public attending in person and wishing to make a comment is asked to complete a speaker slip and follow the instructions below regarding “Notice to the Public”. Any member of the public is invited to submit public comments in advance of the meeting to be answered at the meeting. Please email your questions to CityClerk@cityofelcentro.org or call 760-337-4515 by April 2, 2024.

COUNCIL MEMBERS, STAFF AND THE PUBLIC MAY ATTEND VIA ZOOM.

To participate and make a public comment in person, via Zoom or telephone, please raise your hand, speak up and introduce yourself.

Join Zoom Meeting:
https://us06web.zoom.us/j/4180375132?pwd=Hmo5U2Ztci9qY3l6UW1hKSZVw5R0lVZe09&omn=87332677880

Optional dial-in number: 1 (669) 900-6833
Meeting ID: 418 037 5132 Passcode: 5IHJYM

Public comments via zoom are subject to the same time limits as those in person.

Mayor & Council Members may be reached at (760) 336-8989

| Mayor: | Sylvia Marroquin |
| Mayor Pro-Tem: | Edgard Garcia |
| Council Members: | Tomás Oliva |
| | Sonia Carter |
| | Martha Cardenas-Singh |
| | City Manager: Cedric Ceseña |
| | City Attorney: Elizabeth Martyn Evans |
| | City Clerk: Norma Wyles |

11:30 A.M CLOSED SESSION - RDA CONFERENCE ROOM "A"

ROLL CALL (Open Session)
CLOSED SESSION PUBLIC COMMENT:

Any member of the public wishing to address the City Council on any matter appearing on the closed session may do so at this time. Unless the Mayor extends the time limit, remarks shall be limited to three (3) minutes. Additional opportunities for Public Comments will be given during and at the end of the meeting.

CITY COUNCIL ADJOURNS INTO CLOSED SESSION

CITY COUNCIL CLOSED SESSION

EXISTING LITIGATION

The City Council will recess to closed session to consider existing matters in Reel v. City of El Centro.

TRADE SECRETS

The City Council will recess to closed session pursuant to Govt. Code Section 37606.1 for the purpose of discussion and/or deliberation of reports involving hospital trade secret(s) as defined therein which it would, if prematurely disclosed create a substantial probability of depriving the hospital of a substantial economic benefit including hospital facilities.

NOTICE TO THE PUBLIC

This is a public meeting. If there is an item on the agenda on which you wish to be heard, you are asked to complete a blue speaker slip and submit it to the City Clerk prior to the start of the meeting. Persons wishing to address the Council are not required to identify themselves (Govt Code § 54953.3); however, this information assists the Mayor by ensuring that all persons wishing to address the Council are recognized and also assists the City Clerk in preparing the City Council meeting minutes. When the item is announced and your name is called by the Mayor, please step to the podium and state your name for the record. Unless the Mayor extends the time, there is a three (3) minute time limit for each public presentation. If you wish to address the concerning any other matter not appearing on the agenda, you may do so during the public comment portion of the agenda. However, you may not show a visual presentation without review of that material. If you do so, you will be considered out of order.

* Any information provided on the “Speaker Slip” is voluntary and will be public record.

RECONVENE FOR OPEN SESSION 6:00 P.M.

6:00 P.M. OPEN SESSION:

ALL TIMES ARE APPROXIMATE AND MAY VARY
CALL TO ORDER:

ROLL CALL BY CITY CLERK:

PLEDGE OF ALLEGIANCE:

INVOCATION:

6:05-6:10 CITY ATTORNEY REPORT ON CLOSED SESSION:

6:10-6:15 (TIME MAY VARY) PUBLIC COMMENTS:
The City Council welcomes your input. At this time, members of the public may address the City Council on any matter not listed on the posted agenda. Pursuant to the Brown Act, no action will be taken on any issue brought forth under Public Comments. We ask that you please complete a “Speaker Slip” and submit it to the City Clerk prior to the start of the meeting. Although you are not required to identify yourself (Gov’t Code §54953.3); this information on the “Speaker Slip” assists the Mayor that all persons wishing to address the Council are recognized and also assists the City Clerk in preparing the City Council meeting minutes. Unless the Mayor extends the time, there is a three (3) minute time limit for each public presentation. * Any information provided on the “Speaker Slip” is voluntary and will be public record.

6:15-6:25 PRESENTATIONS AND ANNOUNCEMENTS BY MAYOR:

1. Sun Community Federal Credit Union celebrated their 70th Year Anniversary on March 16, 2024

2. National Library Workers Day, April 9, 2024

6:25-6:40 SCHEDULED PRESENTATIONS:

3. Imperial County Film Commission Annual Report

4. Imperial Valley Small Business Development Center Annual Report

6:40-6:45 CONSENT AGENDA (ITEMS 5-6):

5. Approval of City Council Minutes of March 19, 2024.

6. Adopt Resolution No. 24- , RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL CENTRO CONFIRMING A FINE-FREE LIBRARY AND TAKING NECESSARY RELATED ACTIONS.
6:45-7:00 PUBLIC HEARING:

7. Public Hearing to Consider the Recommendation of the Planning Commission Regarding Conditional Use Permit 23-03 to Operate an Inflatable Obstacle Course at 3451 Dogwood Avenue.

PRESENTATION: Angel Hernandez, Director of Community Development

RECOMMENDATION:
Adopt Resolution No. 24- , RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL CENTRO, CALIFORNIA APPROVING CONDITIONAL USE PERMIT 23-06 TO OPERATE AN INFLATABLE OBSTACLE COURSE AT IMPERIAL VALLEY MALL PARKING LOT LOCATED AT 3451 DOGWOOD AVENUE.

7:00-8:00 NEW BUSINESS:

8. Discussion and related action regarding naming of Dog Park to be located at 670 Park Avenue

PRESENTATION: Adriana Nava, Community Services Director

RECOMMENDATION:
Discussion and related action regarding naming of Dog Park.


PRESENTATION: Adriana Nava, Community Services Director

RECOMMENDATION:
Staff recommends that the City Council accept the Housing Conditions Survey Report as it is mandated by the City's five-year Consolidated Plan.

10. Discussion and Necessary Action Regarding the 2024-2028 Draft Analysis of Impediments to Fair Housing

PRESENTATION: Adriana Nava, Community Services Director

RECOMMENDATION:
Adopt Resolution No. 24- , A RESOLUTION AUTHORIZING THE SUBMISSION OF THE 2024-2028 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND TO IMPLEMENT THE RECOMMENDED ACTIONS TO ADDRESS POTENTIAL IMPEDIMENTS TO FAIR HOUSING IN THE CITY OF EL CENTRO.
11. Establishing Mid-Block Crosswalk on Waterman for Jacaranda Apts. Off-Site Improvements

PRESENTATION: Abraham Campos, PE - Public Works Director/City Engineer

RECOMMENDATION:
Adopt Resolution No. 24-. RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL CENTRO ESTABLISHING A MID-BLOCK CROSSWALK ON WATERMAN AVENUE BETWEEN BRADSHAW AVENUE AND LINCOLN AVENUE.

12. Discussion and any Necessary Action Regarding the Approval of an Agreement Between the City of El Centro and the California Highway Patrol Regarding Road Improvements.

PRESENTATION: Abraham Campos, PE - Public Works Director/City Engineer

RECOMMENDATION:
Adopt Resolution No. 24-. RESOLUTION OF THE CITY OF EL CENTRO APPROVING AN OFF-SITE IMPROVEMENT AGREEMENT BETWEEN THE CALIFORNIA HIGHWAY PATROL AND THE CITY OF EL CENTRO RELATED TO CERTAIN ROAD IMPROVEMENTS ALONG DANENBERG DRIVE.

13. Letter of Support SB 1309 - Lithium Battery Production Council

PRESENTATION: Cedric Ceseña, City Manager

RECOMMENDATION:
Ratify letter of support requested by Senator Steve Padilla's Office.

14. Discussion and any necessary action regarding appointment to the Library & Community Services Board.

PRESENTATION: Sylvia Marroquin, Mayor

RECOMMENDATION:
Mayor's Recommendation: Appointment to the Library & Community Services Board for one (1) un-scheduled non-voting member with term ending on June 30, 2026
8:00-8:10 SUCCESSOR AGENCY TO THE REDEVELOPMENT AGENCY:

15. Discussion and Related Action Regarding Submittal of a Grant Application for Funding Under the HOME Investment Partnerships Program for the Palo Fierro Housing Project

PRESENTATION: Adriana Nava, Community Services Director

RECOMMENDATION:
Adopt Resolution No. SA 24-, A RESOLUTION OF THE SUCCESSOR AGENCY TO THE REDEVELOPMENT AGENCY OF THE CITY OF EL CENTRO APPROVING THE SUBMITTAL OF AN APPLICATION FOR FUNDING TO THE CALIFORNIA STATE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT UNDER THE HOME INVESTMENT PARTNERSHIPS PROGRAM; AND, IF SELECTED, AUTHORIZING THE EXECUTION OF AN AGREEMENT, ANY AMENDMENTS THERETO, AND OF ANY RELATED DOCUMENTS NECESSARY TO PARTICIPATE IN THE HOME INVESTMENT PARTNERSHIPS PROGRAM.

LEGISLATIVE ACTION:

INFORMATIONAL ITEMS:

16. Received and referred to Community Development Department, Application for Alcoholic Beverage License- 2600 Thomas DR, STE #2 El Centro, CA 92243-7507

17. Received and referred to Community Development Department, Application for Alcoholic Beverage License- URSA Hospitality LLC URSA 612 & 614 W Main St El Centro, CA 92243-2920

8:10-8:40 TASK FORCE REPORTS AND MAYOR - COUNCIL MEMBER REPORTS

8:40-8:50 CITY MANAGER REPORT:

ADJOURNMENT:

Materials related to an item on this Agenda submitted to the City Council after distribution of the agenda packet will be available for public inspection at the Office of the City Clerk, 1275 Main Street, El Centro, California 92243, Monday-Friday during normal business hours.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, you should contact the office of the City Clerk at (760)337-4515. Notification at least 48 hours prior to the meeting will enable the City to make reasonable arrangement to assure accessibility to this meeting.
Discussion and Necessary Action Regarding the 2024-2028 Draft Analysis of Impediments to Fair Housing

CITY MANAGER’S RECOMMENDATION:
Adopt Resolution No. 24- , A RESOLUTION AUTHORIZING THE SUBMISSION OF THE 2024-2028 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND TO IMPLEMENT THE RECOMMENDED ACTIONS TO ADDRESS POTENTIAL IMPEDIMENTS TO FAIR HOUSING IN THE CITY OF EL CENTRO.

FISCAL IMPACT:
This report had no impact on the general fund. Approximately $44,490 was utilized from the 2023-2024 CDBG Entitlement Program funds.

STRATEGIC PLANNING PROGRAM 2022-2027 RELATION:
Goal #3 - Community Health, Safety & Welfare
Goal #4 - Recreation and Lifelong Learning

DUE DILIGENCE CHECK FOR CONTRACTORS/CONSULTANTS: DID THE DEPARTMENT VERIFY CURRENT EL CENTRO BUSINESS LICENSE, CONTRACTORS LICENSE, REFERENCE CHECKS, INSURANCE, ETC:
On July 20, 2023, the City of El Centro released a Request for Proposals (RFP) to conduct an Analysis of Impediments to Fair Housing Choice as a component to the City of El Centro's 2024-2028 Consolidated Plan under the Community Development Block Grant Program. City staff followed the required competitive RFP procurement process to select a contractor as set forth in the Community Development Block Grant (CDBG) Procurement Regulations.

BACKGROUND:
In accordance with 24 CFR 91 et seq., 24 CFR 570 et seq., and the U.S. Department of Housing and Urban Development’s (HUD) Fair Housing Planning Guide, the City of El Centro is required to conduct an assessment of Fair Housing: Analysis of Impediments to Fair Housing (AI) as a component to its 2024-2028 Consolidated Plan.

The Assessment of Fair Housing is a comprehensive review of a jurisdiction’s laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing as it relates to fair housing choice. The Assessment of Fair Housing is also a disclosure and review of impediments to fair housing choice in the public and private sector. The research and analysis was focused within the city limits of El Centro.

The proposed Analysis of Impediments is intended to provide the City with technical
data, analysis, maps, and optional actions, which may be taken by the City and other organizations to overcome impediments to fair housing choice.

**DISCUSSION:**
As a recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD), the City of El Centro is required to submit an Analysis of Impediments once every five years.

The Analysis of Impediments (AI) is part of the certification to affirmatively further fair housing that grantees are required to help inform the City’s Consolidated Plan. The AI is designed to help identify fair housing issues and contributing factors to those issues. Grantees must certify their commitment to addressing identified impediments and actively promoting fair housing to meet HUD requirements.

The Analysis of Impediments is a review of impediments to fair housing choice in the City of El Centro, and involves:

- A comprehensive review of the City's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws and how they affect the location, availability, and accessibility of housing;
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes;
- An assessment of the availability of affordable, accessible in a range of unit sizes.

The Draft Analysis of Impediment includes data about the community and will be used as a tool to guide programs, policies, and procedures. The document is attached hereto for Council consideration, review, and certification.

**CONCLUSION:**
Staff recommends adoption of Resolution No. 24- , A RESOLUTION AUTHORIZING THE SUBMISSION OF THE 2024-2028 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND TO IMPLEMENT THE RECOMMENDED ACTIONS TO ADDRESS POTENTIAL IMPEDIMENTS TO FAIR HOUSING IN THE CITY OF EL CENTRO.

**ATTACHMENTS:**
- Resolution (PDF)
- DRAFT Analysis of Impediments to Fair Housing (PDF)
RESOLUTION NO. 24-18

A RESOLUTION AUTHORIZING THE SUBMISSION OF THE 2024-2028
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TO THE U.S.
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND TO
IMPLEMENT THE RECOMMENDED ACTIONS TO ADDRESS POTENTIAL
IMPEDIMENTS TO FAIR HOUSING IN THE CITY OF EL CENTRO

WHEREAS, on July 20, 2023, the City of El Centro released a Request for Proposals (RFP)
to conduct an Analysis of Impediments (AI) to Fair Housing Choice as a component to the City of
El Centro’s 2024-2028 Consolidated Plan under the Community Development Block Grant
(CDBG) Program; and

WHEREAS, on September 12, 2023, City Council approved a contract with Mosaic
Community Planning (Resolution No. 23-90) to complete such AI; and

WHEREAS, the AI identified five primary impediments to fair housing and recommended
actions to address each impediment; and

WHEREAS, the five impediments include: 1) Aging housing stock in need of rehab and
repair; 2) Disparities in access to community resources and services; 3) Low wages impeding
access to opportunities, resources, and restricting housing choice for low/moderate income
households and protected classes; 4) Limited supply of affordable housing for low/moderate
income households; and 5) Limited housing options for persons with disabilities; and

WHEREAS, the recommended actions include, among others, the continued support of the
City’s Housing Rehabilitation Program; partnering with Imperial Valley Housing Authority and
the California Housing Finance Agency to explore potential funding opportunities to increase the
supply of affordable, accessible housing; and fostering collaboration with community partners to
broaden the availability of job training and workforce development opportunities; and

WHEREAS, it is a CDBG requirement that the AI is certified by City Council for the
receipt of funding; and

WHEREAS, with this Resolution, the City Council of the City of El Centro certifies that
will affirmatively further fair housing and take appropriate actions to address the effects of
impediments identified in the AI report prepared by Mosaic Community Planning.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF EL CENTRO, DOES,
HEREBY RESOLVE AND ORDAIN AS FOLLOWS:

1. That the foregoing is true, correct and adopted hereby.

2. That the City Council hereby certifies the Analysis of Impediments to Fair Housing
Choice prepared by Mosaic Community Planning for the City of El Centro.
3. That the City Manager of the City of El Centro or designee is hereby authorized to submit the 2024-2028 Analysis of Impediments to Fair Housing Choice to the U.S. Department of Housing and Urban Development and to implement the recommended actions to address potential impediments to fair housing in the City of El Centro.

PASSED AND ADOPTED at a regular meeting of the City Council of the City of El Centro, California held on the 2nd day of April, 2024.

CITY OF EL CENTRO

Sylvia Marroquin, Mayor

ATTEST:

By Norma Wyles
Norma Wyles, City Clerk

APPROVED AS TO FORM:
Office of the City Attorney

By Elizabeth L. Martyn, City Attorney

STATE OF CALIFORNIA )
COUNTY OF IMPERIAL )
CITY OF EL CENTRO )

I, Norma Wyles, City Clerk of the City of El Centro, California, do hereby certify that the foregoing Resolution No. 24-18 was duly and regularly adopted at a regular meeting of the City Council of the City of El Centro, California held on the 2nd day of April 2024, by the following vote:

AYES: Cardenas-Singh, Oliva, Marroquin, Garcia, Carter

NOES: None

ABSENT: None

ABSTAINED: None

By Norma Wyles
Norma Wyles, City Clerk
A heat map showing the concentrations of poor sidewalk, curb, gutter and gutter locations in the city of El Centro are some of the metrics studied in order to keep up with federally mandated compliance standards. Neighborhoods such as the 300 block of Holt
EL CENTRO — An approval of a citywide housing conditions survey for the first time since 2015 will give El Centro City Council members an opportunity to keep up with federally mandated compliance standards using funds from the Community Development Block Grant program to improve many residential areas in town.

Following recommendations by the city staff, the council approved the survey report after listening to a breakdown of the findings of the survey from Ramiro Ramos, principal managing director of R3E Services LLC, the company contracted to conduct the survey. The report looked at foundations, roofing, siding/stucco, windows and electrical features and encompassed nearly 200,000 individual data points.

Ramos gave five recommendations from the survey at the Tuesday, April 2 meeting, listing the first as, “Targeted outreach programs for funding opportunities for renovations.”

Another option was to offer a neighborhood beautification program with code enforcement efforts, such as warnings to citizens, as well as outreach and monitoring of homes.

Results from the residential zone survey showed there are properties lacking “461 sidewalks, 275 curbs, 230 gutters, 551 driveways, and 497 inadequate site drainage due to obstructions or damaged, and/or missing curb gutters,” per the report provided by Adriana Nava, the community services director for El Centro.
Fig 2: Locations surveyed in the City of El Centro. See Appendix A for locations classified as Dilapidated or Substantial, See Appendix B for all other Unit Condition ratings.

MAP COURTESY CITY OF EL CENTRO

The Economic Development Division continues to target homes that are in disrepair in order to improve the housing stock of El Centro, according to Nava.

The third recommendation by R3E was a citywide vacant property inventory, to which Ramos added, “Something you may want to consider is doing an inventory of commercial properties for economic development purposes.”

Regarding the drainage in the city, Ramos had a recommendation. “It could be beneficial to do an updated assessment to see what are the conditions of these stormwater assets and get an inventory of what needs to be done,” he said, with details in the provided attachments that noted the information would be necessary for the development of a new master drainage plan.

Repair funding based on the survey would come from the city’s Community Development Block Grant funds, which allocated a total amount of $892,902 for curbs, gutters and sidewalks, according to the city’s report.

“We can use this (information) to make better informed decisions,” Nava told the council. “We can concentrate one month on one neighborhood, and another the next.”
Part of the CDBG Program

The council bounced around options like offering community cleanups or partnering with organizations that volunteer to help veterans and other specific groups, as ways to build on existing resources to keep the city in a prideful condition.

Nava said the city is already making strides toward each of the provided recommendations, and shared an update thanks to the city’s Geographic Information Systems technician, Gabriel Martinez. Martinez recently created a map based off the data from a survey of the city, highlighting areas with missing sidewalks. “That will allow us to target using the data of the survey he provided on how we can target those needs and work towards a continuous sidewalk rather than just gaps here and there,” she told the council, with further details provided in the agenda attachments.

Nava added that data driven decisions and working smarter were the overall goals of the survey. “This is done for the CDBG program, but it allows us to be a better, more beautiful city overall,” Nava concluded.
Fair Housing Choices in El Centro

Following the survey updates were more housing details, with the City Council specifically talking about disparities among El Centro residents. The council approved the recommended actions to address potential fair
housing impediments in the city for the 2024-2028 analysis.

The council expressed the intention to bridge the gap in affordable housing and expand housing opportunities for the residents of El Centro, and with the item approved unanimously, evidence suggests there will be major residential improvements in the near future.

Jessica Gay, associate planner with Mosaic Community Planning, presented a Zoom presentation with an analysis of impediments to fair housing in the El Centro city limits. Gay’s presentation included recommendations after gathering a wide variety of data of the area regarding median incomes, transportation access, proximity to parks, grocery stores, doctors, housing costs and affordability and more.

“An analysis of impediments to fair housing choice or (analysis of impediments) is required by any jurisdiction that receives federal housing and community development funds as a means of ensuring that they are affirmatively funding fair housing,” Gay explained to the council.
“We analyze things such as public policies or administrative practices, and we’re looking for things that result in these barriers to housing choice,” she continued.

In the third and final phase of their project, Gay said that after receiving community input, collecting data, analyzing data, and finally, drafting documents, the company was now awaiting the city’s feedback.
Referring to an array of data sources, Mosaic identified various impediments that serve as barriers to fair housing choices for many residents in El Centro. Gay’s data referenced the aging housing stock, which is in need of rehabilitation and repair, and gave a suggestion to implement/expand any rehab and repair programs using CDBG funds.

The analysis of impediments also identified the disparities in access to community resources and services, such as lack of access to higher-paying jobs, therefore missing out on opportunities to have higher wages and better health benefits, and even further more restricted choices on housing options.

Gay’s presentation also suggested the city, “Create educational campaigns to educate workers on legally required job benefits such as health insurance and resources or assistance for instances in which employers are not providing required benefits.”

Another noted impediment for the city is the limited supply of affordable housing for low to moderate income households as well as the disabled community. Additionally, there is limited public housing assistance in the Imperial Valley, and “existing resources are often coupled with waitlist periods of (one) year or more, source of income discrimination by area landlords, and housing quality issues. There is a great need for increased numbers of affordable multifamily units and assistance for low-income homebuyers,” the planning company’s findings reported.
NOTICE OF PUBLIC HEARING OF THE CITY OF EL CENTRO TO OBTAIN PUBLIC INPUT ON THE CITY OF EL CENTRO’S COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) ENTITLEMENT PROGRAM UNDER THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

NOTICE IS HEREBY GIVEN that the City of El Centro will hold a Public Hearing to obtain public input on the Community Development Block Grant Five-Year Consolidated Plan (2024-2028) and the Community Development Block (CDBG) 2024-2025 Annual Action Plan. The CDBG Entitlement Program is funded through the U.S. Department of Housing and Urban Development. It is anticipated that during the 2024-2025 program year the City of El Centro will receive approximately $563,606 in CDBG funds.

The primary purpose of the program is to improve communities by providing decent housing, a suitable living environment and expand economic opportunities, principally for low and moderate-income people. The eligible activities include housing assistance, public improvements and facilities, public services and economic development.

The public hearing will be held at 6:00 p.m. on Tuesday, March 5, 2024, at the City Council Chambers located at 1275 Main Street, El Centro, CA 92243. The purpose of the public hearing is to discuss the 2024-2025 allocation and to provide El Centro residents the opportunity to comment on the use of CDBG funds. All persons interested in providing suggestions or recommendations on the eligible activities are invited to attend and be heard. If residents are unable to attend the meeting in person, comments may be submitted to the El Centro Economic Development Office at 1249 W. Main St, El Centro, CA or by e-mail to economic@cityofelcentro.org prior to the Public Hearing.

If special accommodations are required due to a sensory or mobility impairment/disability, please contact the Economic Development Division at (760) 337-4543 to arrange for those accommodations to be made.

Legal 9125

Published: February 15, 2024

AVISO DE AUDIENCIA PÚBLICA DE LA CIUDAD DE EL CENTRO PARA OBTENER LA OPINIÓN DEL PÚBLICO SOBRE EL PROGRAMA DE SUBVENCIONES EN BLOQUE PARA EL DESARROLLO COMUNITARIO (CDBG) DE LA CIUDAD DE EL CENTRO BAJO EL DEPARTAMENTO DE VIVIENDA Y DESARROLLO URBANO DE LOS ESTADOS UNIDOS

POR LA PRESENTE SE NOTIFICA que la Ciudad de El Centro llevará a cabo una Audiencia Pública para obtener la opinión del público sobre el Plan Consolidado de Cinco Años de Subvención en Bloque para el Desarrollo Comunitario (2024-2028) y el Plan de Acción Anual 2024-2025 del Bloque de Desarrollo Comunitario (CDBG). El Programa de Derechos CDBG se financia a través del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos. Se anticipa que durante el año programático 2024-2025 la Ciudad de El Centro recibirá aproximadamente $563,606 en fondos CDBG.

El objetivo principal del programa es mejorar las comunidades proporcionando viviendas dignas, un entorno de vida adecuado y ampliar las oportunidades económicas, principalmente para las personas de ingresos bajos y moderados. Las actividades elegibles incluyen asistencia para la vivienda, mejoras e instalaciones públicas, servicios públicos y desarrollo económico.

La audiencia pública se llevará a cabo a las 6:00 p.m. el martes 5 de marzo de 2024 en las Cámaras del Concejo Municipal ubicadas en 1275 Main Street, El Centro, CA 92243. El propósito de la audiencia pública es discutir la asignación del 2024-2025 y brindar a los residentes de El Centro la oportunidad de comentar sobre el uso de los fondos CDBG. Todas las personas interesadas en proporcionar sugerencias o recomendaciones sobre las actividades elegibles están invitadas a asistir y ser escuchadas. Si los residentes no pueden asistir a la reunión en persona, los comentarios pueden enviarse a la Oficina de Desarrollo Económico de El Centro localizada en el 1249 W. Main St, El Centro, CA o por correo electrónico a economic@cityofelcentro.org antes de la Audiencia Pública.

Si se requieren adaptaciones especiales debido a un impedimento/disacidad sensorial o de movilidad, comuníquese con la División de Desarrollo Económico al (760) 337-4543 para hacer los arreglos necesarios para que se realicen esas adaptaciones.
CITY OF EL CENTRO

NOTICE OF 30-DAY PUBLIC REVIEW
CDBG ONE-YEAR ACTION PLAN (2023-2024)

Under Title I of the Housing and Community Development Act of 1974, as amended, the City of El Centro invites citizens to participate in the preparation of the FY 2023-2024 One Year Action Plan. The One-Year Action Plan consists of the proposed activities to be funded through the Community Development Block Grant Program (CDBG). The CDBG funds are for community development improvements to benefit low and moderate-income residents. During FY 2023-2024, the City of El Centro anticipates receiving approximately $563,406 in Community Development Block Grant funds. The City also anticipates expending approximately $14,000 for fiscal year 2023-2024 (July 1, 2023 – June 30, 2024) in State Program Income generated by previous State awarded grants. Therefore, a total of $577,406 is expected to be available for program year 2023-2024. Pursuant to federal regulations, every CDBG activity must meet the requirements for one of the national objectives: benefit low and moderate-income persons; prevent or eliminate slum or blight; or meet an urgent need that poses a serious or immediate threat to the health or welfare of the community.

NOTICE IS HEREBY GIVEN that a public hearing will be held at 12:00 p.m. on Thursday, April 13, 2023, at the City Council Chambers located at 1275 Main Street, El Centro, CA 92243. The purpose of the public hearing is to present the City Council the City’s Draft CDBG 2023-2024 One-Year Action Plan and to provide El Centro residents with the opportunity to comment on the use of CDBG funds.

The publication of this notice is the beginning of the 30-day public review period required under Federal Regulations 24 CFR 91.110(b)(2). The public review and written comment period begins April 14, 2023 and ends May 13, 2023.

One-Year Action Plan

For the fiscal year beginning July 1, 2023 and ending June 30, 2024, the City of El Centro proposes the utilization of CDBG funds as follows:

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>2023-2024 FUNDING ALLOCATION</th>
<th>CDBG PROGRAM INCOME</th>
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<tr>
<td>SUBTOTAL</td>
<td>$563,406</td>
<td>$14,000</td>
</tr>
<tr>
<td>TOTAL FUNDS FOR FY 2023-2024</td>
<td>$577,406</td>
<td></td>
</tr>
</tbody>
</table>

A copy of the One-Year Action Plan is available for public review at the following locations:

City Hall
City Clerk’s Office
1275 Main Street
El Centro, CA 92243

Economic Development Division
1249 Main Street
El Centro, CA 92243

El Centro Public Library
1198 N. Imperial Avenue
El Centro, CA 92243

The purpose of the public hearing will be to give citizens an opportunity to make their comments known. City Council meetings are held in person as well as virtually. All members of the public are able to participate via Zoom. The information for participating virtually is listed below.

Join Zoom Meeting
https://us02web.zoom.us/j/81922721733?pwd=Ob24eFVHbVhFbXZhPUD6aXzN0dVZzUT09
Meeting ID: 819 2272 2173; Passcode: 072002

If special accommodations are required due to sensory impairment/disability, please contact the Economic Development Division at (760) 337-4543 to arrange for those accommodations to be made.

If you are unable to attend the public hearing, you may direct written comments on the housing, community, economic development needs, and proposed projects as articulated in the CDBG One-Year Action Plan. All comments relative to the Public Hearing for the One-Year Action Plan (2023-2024) are to be submitted to the Economic Development Division no later than 11:00 a.m. on April 13, 2023, and may be addressed to the following:

City of El Centro
Community Services Department
Economic Development Division
Attn: Adriana Nava, Director of Community Services
1249 Main Street
El Centro, CA 92243
760-337-4543
Introduction to the Plan

The AI identifies barriers to equal housing options and proposes strategies to overcome them

- Integration and segregation
- Areas of poverty
- Access to opportunity
- Housing need

Required by HUD for all CDBG fund recipients
A housing impediment is...

Any action, omission, or decision that restricts, or has the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

Planning Process

**PHASE ONE**
- Research
- Community Input
- Data Collection

A participatory process with opportunities for stakeholder engagement and the collection of data from a variety of sources.

**PHASE TWO**
- Analysis
- Recommendations
- Document Drafting

Analysis of stakeholder input and data, as well as the development of recommendations and document drafting.

**PHASE THREE**
- Final Draft
- Public Comment
- Presentation/Approval

Revisions based on City review and public comments. Submission of final documents for approval.
## Data Sources

- **U.S. Census Bureau**
  - Decennial Census
  - American Community Survey (ACS) 5-Year Estimates

- **Stakeholder Input**
  - Focus Group
  - Interviews
  - Fair Housing Questionnaire

- **Housing Data**
  - Comprehensive Housing Affordability Strategy (CHAS)
  - A Picture of Subsidized Housing (APSH)
  - Low-Income Housing Tax Credit (LIHTC)
  - Home Mortgage Disclosure Act (HMDA)

- **Stakeholder Input**
  - Focus Group
  - Interviews
  - Fair Housing Questionnaire

- **Existing and Previous Plans and Studies**
  - City of El Centro Zoning Ordinance
  - Annual Action Plans, CAPERs, and Consolidated Plan
  - Imperial Valley Transit
  - Imperial County Transportation Commission
  - Imperial Valley Housing Authority Administrative Plan

## Identified Impediments

<table>
<thead>
<tr>
<th>#1</th>
<th>Low Wages Impede Access to Opportunities, Resources, and Restrict Housing Choice for Low/Mod Income Households and Protected Classes</th>
</tr>
</thead>
<tbody>
<tr>
<td>#2</td>
<td>Limited Supply of Affordable Housing for Low/Mod Income Households</td>
</tr>
<tr>
<td>#3</td>
<td>Aging Housing Stock in Need of Repair and Rehabilitation</td>
</tr>
<tr>
<td>#4</td>
<td>Disparities in Access to Community Resources and Services</td>
</tr>
<tr>
<td>#5</td>
<td>Limited Housing Options for Persons With Disabilities</td>
</tr>
<tr>
<td>#6</td>
<td>Need for Continued and Expanded Fair Housing Activities</td>
</tr>
</tbody>
</table>
Overview of Recommended Actions

| #1 | Collaborate with community partners to expand the accessibility of job training and workforce development opportunities |
| #2 | Continue to review QAP guidelines to identify any local government actions that could be taken to increase the competitiveness of developer applications |
| #3 | Continue to support the rehabilitation of existing affordable housing options through the City’s Housing Rehabilitation Program, providing outreach to qualifying homeowners |
| #4 | Expand financial education and employment assistance programs in areas of the city with low median household incomes |
| #5 | Partner with the Imperial Valley Housing Authority and the California Housing Finance Agency to explore potential funding opportunities to increase the supply of affordable, accessible housing |
| #6 | Continue to offer fair housing education activities in partnership with the Inland Fair Housing Mediation Board, with a focus on expanding the pool of partners that IFHMB works with |

Thank you!

Questions or comments?

jessica_g@mosaiccommunityplanning.com
info@mosaiccommunityplanning.com
(470) 435-6022
City of El Centro Fair Housing Questionnaire

Q1 What is your primary role in the housing industry?

Answered: 7  Skipped: 0
City of El Centro Fair Housing Questionnaire

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing Development</td>
<td>14.29%</td>
</tr>
<tr>
<td>Construction/Development</td>
<td>0.00%</td>
</tr>
<tr>
<td>Insurance</td>
<td>0.00%</td>
</tr>
<tr>
<td>Lending/Mortgage Industry</td>
<td>42.86%</td>
</tr>
<tr>
<td>Local Government</td>
<td>14.29%</td>
</tr>
<tr>
<td>Property Management</td>
<td>0.00%</td>
</tr>
<tr>
<td>Real Estate Sales/Brokerage</td>
<td>28.57%</td>
</tr>
<tr>
<td>Service Provision</td>
<td>0.00%</td>
</tr>
<tr>
<td>Other (please list):</td>
<td>0.00%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>

Q2 What is the name of your organization or agency?
Answered: 6  Skipped: 1

Q3 Does your organization or agency service a specific geographical area or areas?
Answered: 7  Skipped: 0
**City of El Centro Fair Housing Questionnaire**

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>28.57%</td>
</tr>
<tr>
<td>Yes (please specify)</td>
<td>71.43%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>

Q4 How familiar are you with fair housing laws?

Answered: 7  Skipped: 0
Q5 Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?

Answered: 7  Skipped: 0
Q6 If you answered “yes” to the previous question, have you participated in fair housing activities or training?

Answered: 7   Skipped: 0
Q7 Do any of these issues create barriers to fair housing in El Centro?

Answered: 6  Skipped: 1

The rental

6 / 9
### City of El Centro Fair Housing Questionnaire

<table>
<thead>
<tr>
<th>Industry/Ex.</th>
<th>YES</th>
<th>NO</th>
<th>I DON'T KNOW</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>The rental housing market (Ex. Refusing to rent based on religion or color)</td>
<td>33.33%</td>
<td>66.67%</td>
<td>0.00%</td>
<td>6</td>
</tr>
<tr>
<td>The real estate industry (Ex. Only showing properties in certain areas to families with children)</td>
<td>16.67%</td>
<td>66.67%</td>
<td>16.67%</td>
<td>6</td>
</tr>
<tr>
<td>The mortgage and home lending industry (Ex. Offering higher interest rates to women or racial minorities)</td>
<td>33.33%</td>
<td>66.67%</td>
<td>0.00%</td>
<td>6</td>
</tr>
<tr>
<td>The housing construction or housing design fields (Ex. New rental complexes built with narrow doorways that do not allow wheelchair accessibility)</td>
<td>33.33%</td>
<td>50.00%</td>
<td>16.67%</td>
<td>6</td>
</tr>
<tr>
<td>The home insurance industry (Ex. Limiting policies and coverages for racial minorities)</td>
<td>16.67%</td>
<td>50.00%</td>
<td>33.33%</td>
<td>6</td>
</tr>
<tr>
<td>The home appraisal industry (Ex. Basing home values on the ethnic composition of neighborhoods)</td>
<td>33.33%</td>
<td>66.67%</td>
<td>0.00%</td>
<td>6</td>
</tr>
</tbody>
</table>

Q8 Does your institution have any policies or procedures in place that address the barriers to fair housing indicated above?

Answered: 6  Skipped: 1
City of El Centro Fair Housing Questionnaire

<table>
<thead>
<tr>
<th>ANSWER CHOICES</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>66.67%</td>
</tr>
<tr>
<td>No</td>
<td>0.00%</td>
</tr>
<tr>
<td>I don't know</td>
<td>33.33%</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>

Q9 Use this space to provide any additional info that you think would be helpful for our plan.

Answered: 0  Skipped: 7
APPENDIX II:
HOUSING DISCRIMINATION COMPLAINT DATA
## Housing Discrimination Complaints Through HUD in City of El Centro, CA

**January 1, 2019 Through December 31, 2023**

<table>
<thead>
<tr>
<th>HUD/FHAP</th>
<th>Violation City</th>
<th>Violation State and County</th>
<th>HUD Filing Date</th>
<th>Bases</th>
<th>Issues</th>
<th>Closure Date</th>
<th>Closure Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>FHAP</td>
<td>El Centro</td>
<td>California - Imperial</td>
<td>08/31/20</td>
<td>Disability, Retaliation</td>
<td>Failure to make reasonable accommodation</td>
<td>12/03/20</td>
<td>Conciliation/settlement successful</td>
</tr>
<tr>
<td>FHAP</td>
<td>El Centro</td>
<td>California - Imperial</td>
<td>09/13/21</td>
<td>Race, Disability</td>
<td>Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation</td>
<td>07/05/22</td>
<td>No cause determination</td>
</tr>
<tr>
<td>FHAP</td>
<td>El Centro</td>
<td>California - Imperial</td>
<td>02/15/22</td>
<td>Familial Status</td>
<td>Discriminatory terms, conditions, privileges, or services and facilities</td>
<td>12/12/22</td>
<td>No cause determination</td>
</tr>
<tr>
<td>FHAP</td>
<td>El Centro</td>
<td>California - Imperial</td>
<td>12/27/22</td>
<td>Disability</td>
<td>Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation</td>
<td>10/02/23</td>
<td>Conciliation/settlement successful</td>
</tr>
</tbody>
</table>
# Housing Discrimination Complaints Through Imperial Valley Housing Authority (IVHA) in City of El Centro, CA

## January 1, 2019 Through December 31, 2023

### City of El Centro Fair Housing Complaint Data

<table>
<thead>
<tr>
<th>Fiscal Year 18-19</th>
<th>Fiscal Year 19-20</th>
<th>Fiscal Year 21-22</th>
<th>Fiscal Year 22-23</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Fair Housing Services</strong></td>
<td><strong>Fair Housing Services</strong></td>
<td><strong>Fair Housing Services</strong></td>
<td><strong>Fair Housing Services</strong></td>
</tr>
<tr>
<td><strong>Category</strong></td>
<td><strong># of Cases</strong></td>
<td><strong>Category</strong></td>
<td><strong># of Cases</strong></td>
</tr>
<tr>
<td>Age</td>
<td>0</td>
<td>Age</td>
<td>0</td>
</tr>
<tr>
<td>Ancestry</td>
<td>0</td>
<td>Ancestry</td>
<td>0</td>
</tr>
<tr>
<td>Arbitrary</td>
<td>0</td>
<td>Arbitrary</td>
<td>1</td>
</tr>
<tr>
<td>Color</td>
<td>0</td>
<td>Color</td>
<td>0</td>
</tr>
<tr>
<td>Disability</td>
<td>4</td>
<td>Disability</td>
<td>3</td>
</tr>
<tr>
<td>Familial Status</td>
<td>0</td>
<td>Familial Status</td>
<td>0</td>
</tr>
<tr>
<td>Marital Status</td>
<td>0</td>
<td>Marital Status</td>
<td>0</td>
</tr>
<tr>
<td>National Origin</td>
<td>0</td>
<td>National Origin</td>
<td>0</td>
</tr>
<tr>
<td>Race</td>
<td>0</td>
<td>Race</td>
<td>1</td>
</tr>
<tr>
<td>Religion</td>
<td>0</td>
<td>Religion</td>
<td>0</td>
</tr>
<tr>
<td>Sex</td>
<td>1</td>
<td>Sex</td>
<td>0</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>0</td>
<td>Sexual Orientation</td>
<td>0</td>
</tr>
<tr>
<td>Source of Income</td>
<td>0</td>
<td>Source of Income</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>5</td>
<td><strong>Total</strong></td>
<td>7</td>
</tr>
</tbody>
</table>

**Grand Total** 5 **Grand Total** 7

**Grand Total** 9 **Grand Total** 2
## APPENDIX III: ZONING ANALYSIS MATRIX

### City of El Centro, CA

Average Total Risk Score: **1.0**

**Risk Scores Key**

1 = **low risk:** the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;

2 = **medium risk:** the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;

3 = **high risk:** the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

**Source Documents:**

### TABLE 26. ZONING ANALYSIS MATRIX

<table>
<thead>
<tr>
<th>Issue</th>
<th>Conclusion</th>
<th>Risk Score</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Does the jurisdiction’s definition of “family” have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</td>
<td>1a. The zoning ordinance’s definition of “family” is not unreasonably restrictive. It includes two (2) or more individuals related by convenience who occupy the same dwelling unit.</td>
<td>1</td>
<td>Sec. 29-21: Definition of “family” - Family: Two (2) 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.</td>
</tr>
<tr>
<td>1b. Does the definition of “family” discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</td>
<td>1b. The definition of “family” does not discriminate against or treat unrelated individuals with disabilities differently. The definition of “family” explicitly includes residents of residential care facilities and group homes for people with disabilities.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</td>
<td>2a. The code does not treat housing for persons with disabilities differently than other residential uses. Small residential care facilities that provides care for six (6) or fewer persons are a permitted use in all residential zones. Large residential care facilities that provide care for seven (7) or more persons are a permitted use in 4 out of 5 residential zones – RR, R1, R2, and R3. Supportive or transitional housing is a permitted use in all residential zones.</td>
<td>1</td>
<td>Sec. 29-53: Residential zones use regulations and Table 29-53.1</td>
</tr>
<tr>
<td>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</td>
<td>2b. Supportive or transitional housing is a permitted use in all residential zones.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 3a. Do the jurisdiction’s policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements? | 3a. The City provides a process for persons with disabilities seeking reasonable accommodations in Sec. 29-300.2 of the zoning code.  
3b. The City does not require a public hearing in the process of evaluating requests for reasonable accommodations. |
| 4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types? | The ordinance states that large residential care facilities cannot be placed within 300 ft of one another on the same street. Exemptions may be approved depending on certain conditions. These spacing requirements, combined with the ability to appeal for |

Sec. 29-300: “Reasonable accommodation” in the land use and zoning context means providing individuals with disabilities, or developers of housing for people with disabilities, flexibility in the application of land use and zoning and building regulations, policies, practices and procedures, or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities.  

Sec. 29-300.2
<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>an exemption, are unlikely to pose risk for discrimination against large residential care facilities.</td>
<td>approved by the city if the existing facility is at capacity or the applicant demonstrates that a need exists for a unique or particular service not currently provided by the existing large residential care facility.”</td>
<td></td>
</tr>
<tr>
<td>5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?</td>
<td>The City does not restrict any inherently residential uses protected by fair housing laws to non-residential zones.</td>
<td>1</td>
</tr>
<tr>
<td>6. Does the jurisdiction’s zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?</td>
<td>Though the zoning code could be reevaluated to determine whether these design regulations could be adjusted to further incentivize the production of affordable housing, they do not impose unreasonable standards on development.</td>
<td>1</td>
</tr>
<tr>
<td>7a. Does the zoning ordinance fail to provide residential districts where multifamily housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts?</td>
<td>No, MFR districts hold multifamily dwellings as a permitted use as of right. They provide the highest yielding residential density allowed.</td>
<td>1</td>
</tr>
</tbody>
</table>

Sec. 29-53: Residential zones use regulations and Table 29-53.

Sec. 29-54: - Residential zones property development standards and Table 29-54.1.
7b. Do multi-family districts restrict development only to low-density housing types?

| 7b. | “R3 multiple-family residential zone. This zone is intended to permit the development of medium high-density apartment and condominium dwellings with a maximum density of twenty-five (25) dwelling units per net acre, on lots not less than seven thousand two hundred (7,200) square feet in net area.” |

8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?

| 8. | No, there are no unreasonable restrictions placed on special types of affordable or low-income housing, such as accessory dwelling units (ADUs), mobile homes, or manufactured homes. |

9a. Are the jurisdiction’s design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act’s accessibility standards for design and construction?

| 9a. | The City has adopted and incorporated the 2022 edition of the California Building Code, which is based on the International Building Code (IBC) 2021 edition. HUD currently recognizes the 2009, 2012, 2015 and 2018 editions of the IBC as safe harbors under the Fair Housing Act, and should begin review of the 2021 soon. Under the City of El Centro’s Community Development Department, the Building and Safety Division monitors compliance and provides Building Code enforcement for all construction projects located in the city. The Code Enforcement Division |

9b. Is there any provision for monitoring compliance?

| 9b. | 1 |

Sec. 29-168. - Accessory dwelling unit regulations.

Secs. 29-188-190 – Mobile Home Regulations

Sec. 8-59 - Standards for manufactured homes

1 | Sec. 7-36. - Adoption of the California Building Code, 2022 edition; deletions, amendments, additions |
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?</td>
<td>Yes</td>
<td>Article IV, Division 4 – Density Bonus Program</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sec. 29-205 – Intent and purpose. “Density bonuses for qualified residential development shall be provided as specified in California Government Code Sections 65915 through 65918.”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>California Government Code Chapter 4.3, Density Bonuses and Other Incentives (Sec. 65915 – 65918)</td>
</tr>
</tbody>
</table>