

Appendix D: Affirmatively Furthering Fair Housing

D.1 Introduction and Overview of AB 686

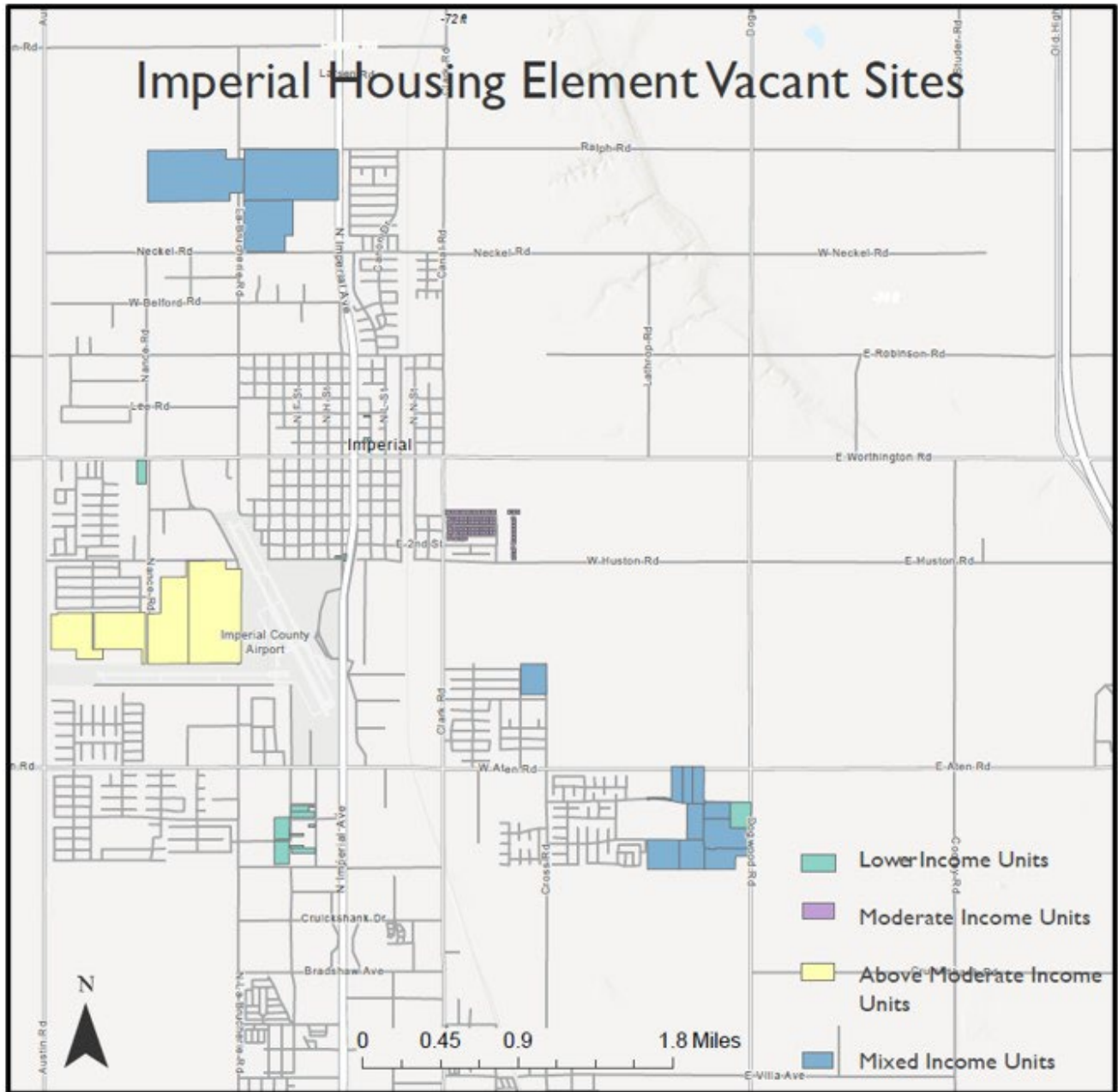
AB 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. The Bill added an assessment of fair housing to the Housing Element which includes the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

An Analysis of Impediments (AI) to Fair Housing Choice examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies any existing impediments that limit housing choice, and proposes actions to mitigate those impediments. However, the City of Imperial does not have their own AI. However, the City of El Centro's prepared the 2019-2024 Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan (2019 AI) with valuable input from the Community Development Department, Inland Fair Housing and Mediation Board, Imperial County Association of Realtors, Access to Independent, Imperial Valley Transit, Imperial Valley Housing Authority (IVHA), and their community. As a neighboring City with many overlapping issues and concerns, the City of El Centro's AI was referenced, as appropriate, in this analysis. Imperial County does not prepare Analysis of Impediments to Fair Housing Choice, therefore, regional data for this analysis uses HCD's 2020 AI for regional comparisons.

D.2 Assessment of Fair Housing Issues

The below sections identify the required issue areas for consideration in the affirmatively further fair housing (AFFH) analysis and describe the regional and local trends (when data is available) for the County and the City of Imperial. As part of this AFFH analysis, the City must show sites identified in the inventory were selected a manner that is consistent with its duty to affirmatively further fair housing. If applicable, each section also assesses the location and distribution of the RHNA units which are presented by location and income level in Figure D-1. It should be noted that all RHNA units are accommodated for on vacant sites and due to the unique affordability characteristics of the City, certain sites, referred to as "Mixed Income Sites" can accommodate both moderate and above-moderate income levels of housing.

Figure D-1: City of Imperial RHNA Unit Distribution



A. Fair Housing Enforcement and Outreach

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

Fair Housing Enforcement

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

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

The Community Development Department of the City of Imperial works with the Building Department in investigating and resolving housing discrimination complaints through the referral to HUD and other County services such as the IVHA and Inland Fair Housing and Mediation Board (IFHMB). No data related to fair housing complaints is available for this analysis and the City does not have a dedicated webpage related to available fair housing services. Staffing issues have been identified as a major contribution to the lack of City specific enforcement programs and practices.

Fair Housing Education and Outreach

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

- Develop bilingual outreach materials to inform the public of available housing opportunities, as well as various assistance programs available to eligible households, to be posted on the County's website and community boards and at gas stations, schools, and other public places and;

- Coordinate with local fair housing providers to conduct a public workshop on tenant and landlord rights and responsibilities.

As a part of developing a Countywide plan to address the Assessment of Fair Housing (AFH), Imperial County conducted a series of outreach events to gather citizen values and concerns. The following events were held for residents, agencies and local stakeholders:

- January and February 2021: The County reached out to ten community organizations, fair housing advocates, services providers, and stakeholders to assess housing needs in the County. Three of ten participated:
 - Campesinos Unidos – January 26, 2021
 - Housing Authority of the County of Imperial County– February 9, 2021
 - Imperial County Department of Social Services – February 12, 2021
- April 27 and 28, 2021: The County held two virtual community workshops.

The County marketed the outreach events through distributing flyers in Spanish and English to stakeholder organizations, affordable housing providers, and community organizations. All community meetings had Spanish-speaking breakout rooms in order to provide accessible information to residents.

The City of Imperial relies on the County of Imperial outreach efforts to further fair housing education to its residents. Staffing issues have been identified as a major contribution to the lack of City specific outreach programs and practices.

B. Integration and Segregation

Race/Ethnicity

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

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices can be used to are used to measure how evenly two groups are distributed throughout a jurisdiction. The following shows how HUD views various levels of the index:

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

Regional Trends

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

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

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

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

Source: ACS 2013-2019 5-year estimates

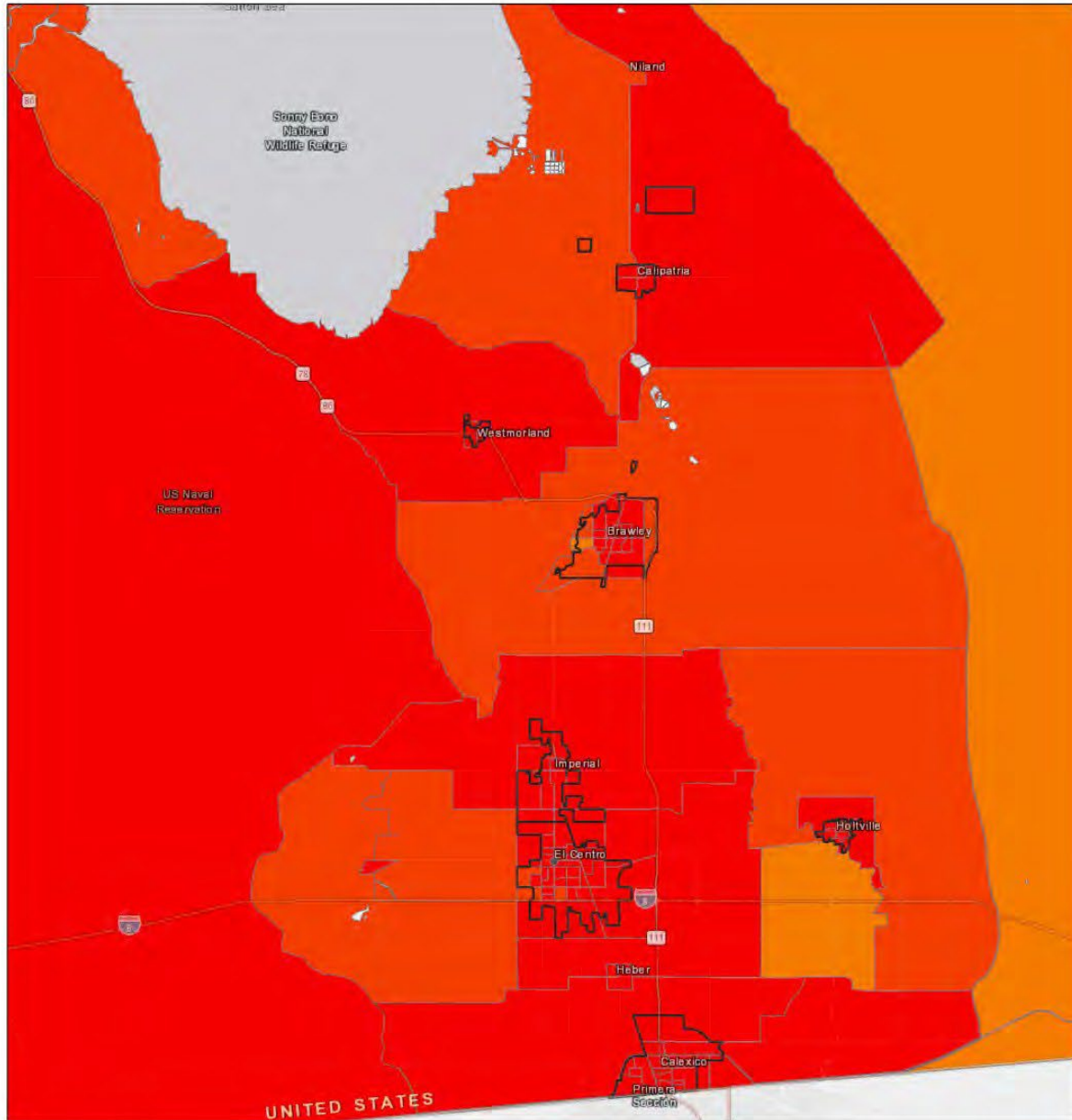
As explained above, dissimilarity indices are measures of segregation, with higher indices meaning higher degree of segregation. In Imperial County, all minority (non-white) residents combined are considered moderately segregated from White residents (index is 41.76 in 2020). However, the dissimilarity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

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

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

Sources: HUD Dissimilarity Index, 2020.

Figure D-2: Minority Concentration by Block Group - Imperial County



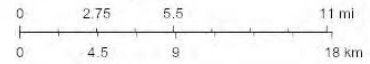
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

- 41 - 60%
- 61 - 80%
- > 81%

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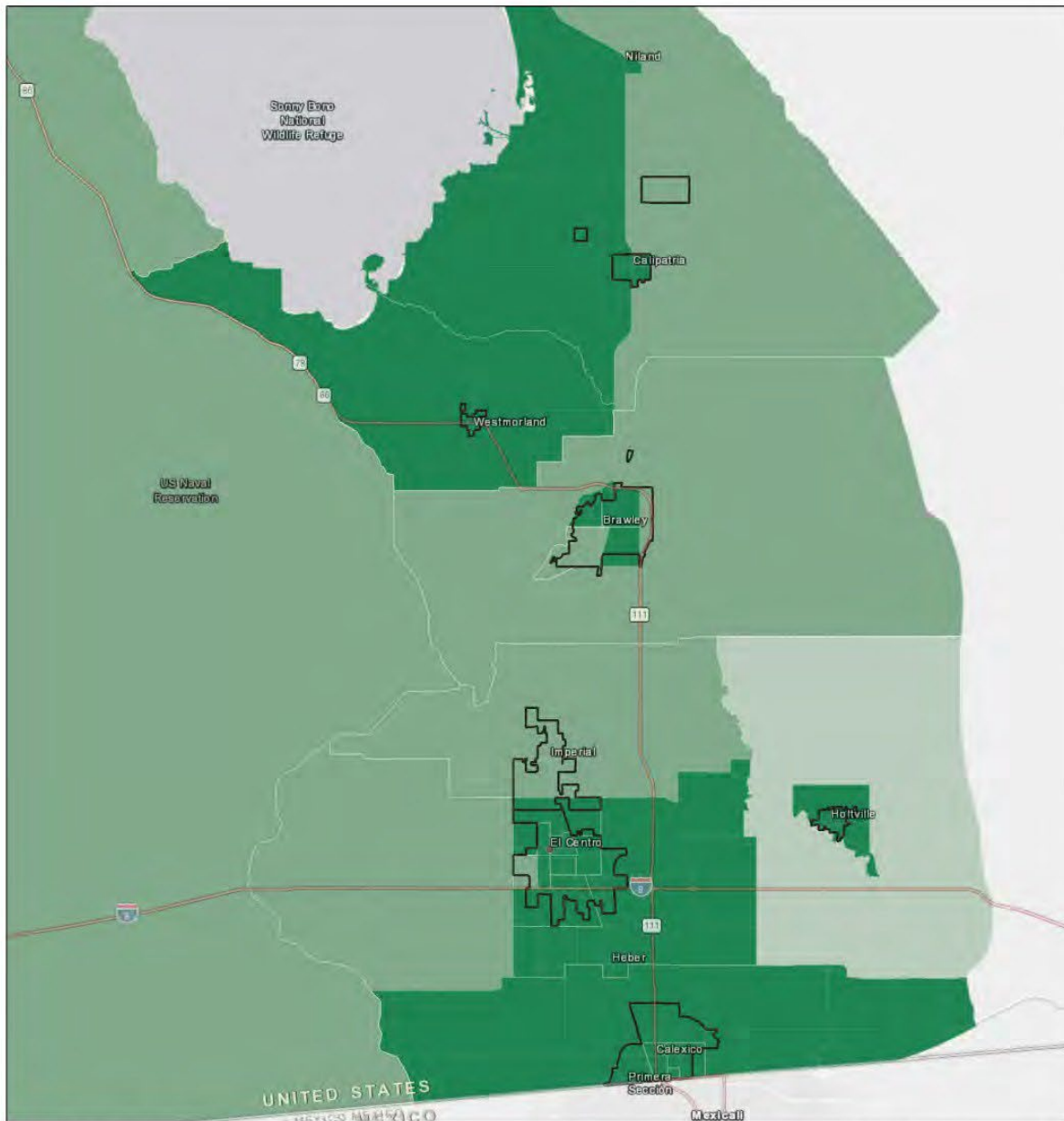


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CA HCD

Figure D-3: Racial and Ethnic Majorities by Census Tract - Imperial County



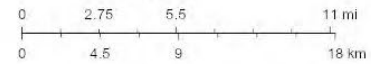
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City/Town Boundaries

(R) Predominant Population - Hispanic Majority Tracts

- Slim (gap < 10%)
- Sizeable (gap 10% - 50%)
- Predominant (gap > 50%)

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CA HCD

Figure D-2 shows the concentration of minority population in the County is widespread across Imperial County. Figure D- 3 shows census tracts in Imperial by the racial or ethnic groups that make up the majority of the population. The categories show the percentage population gap between the majority racial/ethnic group and the next largest racial/ethnic group. The more intense the color, the higher the percentage gap between the predominant racial/ethnic group and the next largest racial/ethnic group. As expected based on the high percentage of Hispanic population (Table D-1), all Imperial County cities have a high concentration of Hispanic majority census tracts. Overall, Hispanic population predominates the County.

Local Trends

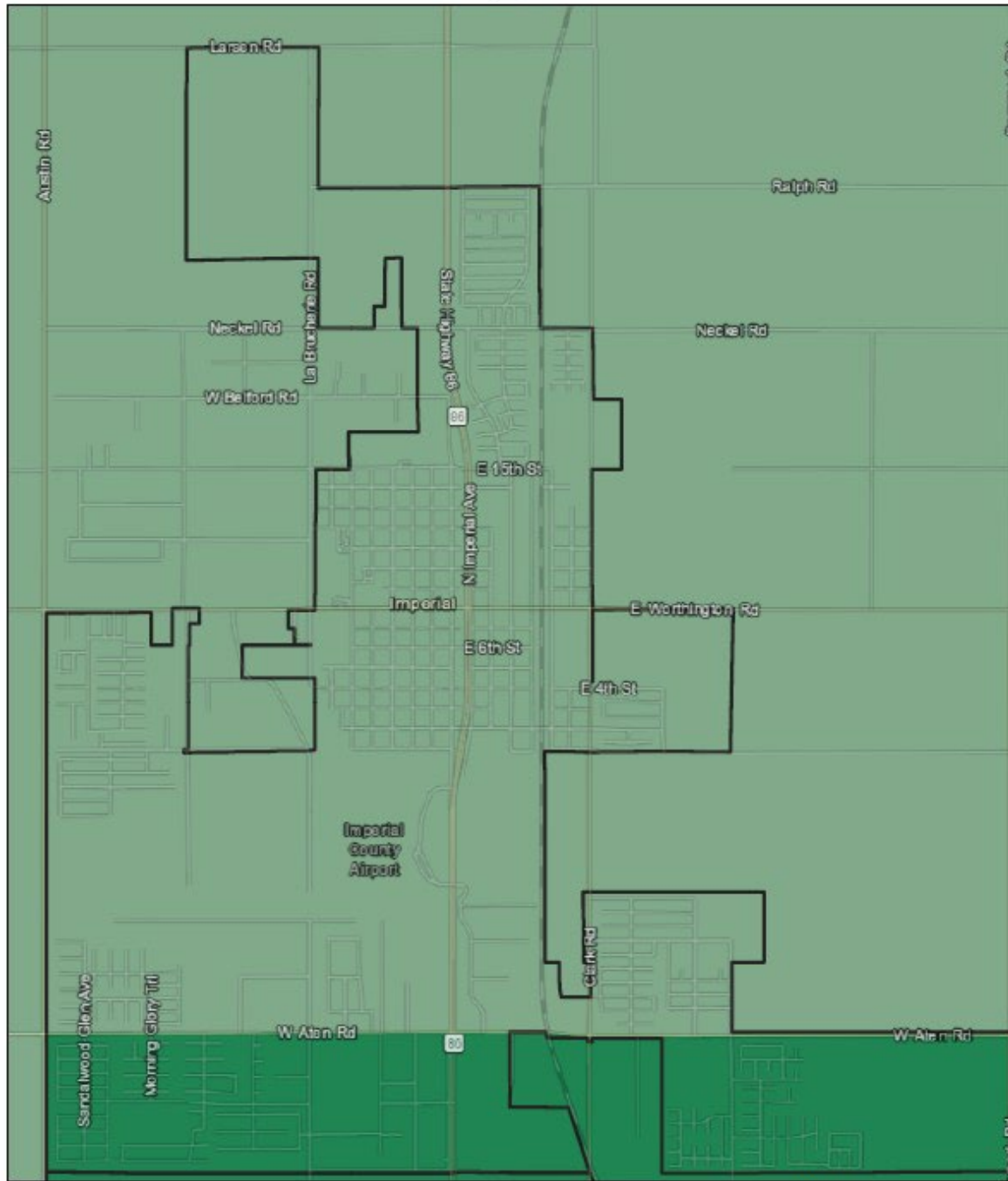
Like the County, Imperial’s population is mostly Hispanic (78 percent, Table D- 1). As shown in T able D- 3, White population has decreased by almost one and a half percent between 2010 and 2019, while the Hispanic/Latino has grown by almost three percent. Most other races did not change in their share of the population with the percentage of black population decreasing by 0.8 percent and the Asian population increasing only by 0.7 percent in the past decade.

Figure D-4 shows that the Hispanic majority population is sizeable throughout the entire City. Only the census tracts in the lower portion of the City has a slightly higher concentration of Hispanic population. Figure D-5 shows that minority concentrations make up more than 81 percent of all census tracts in the City.

Table D-3: Race/Ethnicity Composition Changes (2010-2019)

	2010	2019	% change
White alone	18.5%	17.1%	-1.4%
Black or African American alone	2.5%	1.7%	-0.8%
American Indian and Alaska Native alone	0.0%	0.3%	0.3%
Asian alone	1.6%	2.3%	0.7%
Native Hawaiian and Other Pacific Islander alone	0.1%	0.0%	-0.1%
Other	0.2%	0.2%	0.0%
Hispanic or Latino:	75.1%	78.0%	2.9%
Total Population	15,782	17,454	10.6%
Source: ACS 2010-2014, 2015-2019 estimates			

Figure D-4: Racial and Ethnic Majorities by Census Tract- City of Imperial



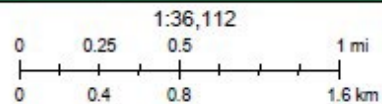
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City/Town Boundaries

(R) Predominant Population - Hispanic Majority Tracts

Sizeable (gap 10% - 50%)

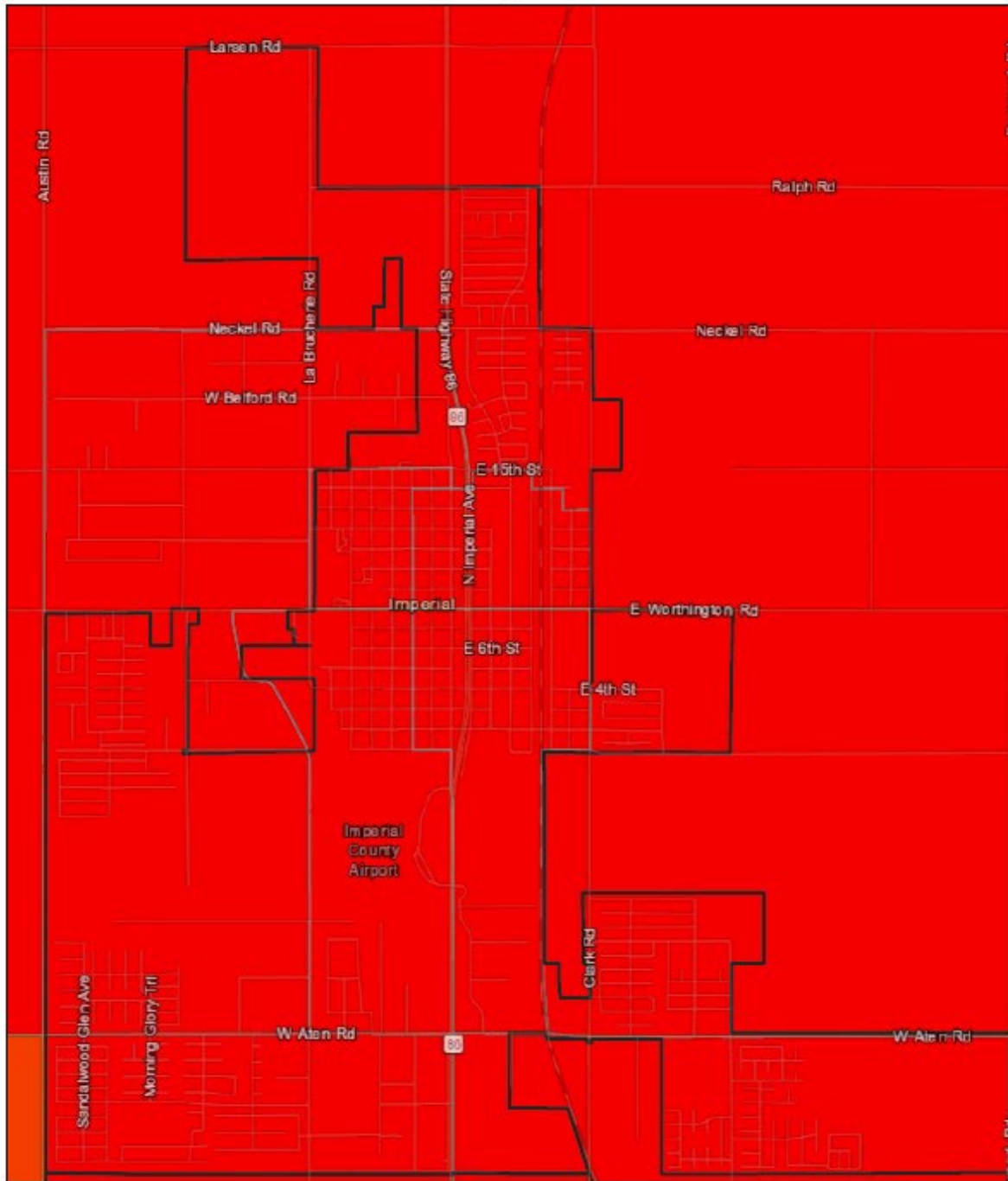
Predominant (gap > 50%)



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Figure D-5: Minority Concentration - City of Imperial



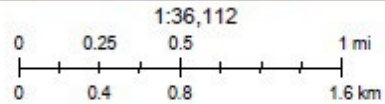
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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group

61 - 80%

> 81%



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Distribution of RHNA Units by Percent Minority Concentration

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

As shown in Figure D-4, the minority population in all census block groups of the City is over 81 percent. Therefore, when compared to RHNA unit distribution in Figure D-1, there are no segregated living patterns because 100 percent of all RHNA units are located in census tracts with over 81 percent racial/ethnic minorities.

Persons with Disabilities

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

Regional Trends

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

Figure D-6 shows the population with disabilities census tracts in Calipatria (where over 40 percent of the population has a disability) followed by one census tract in Brawley and El Centro each (where between 20 and 30 percent of the population has a disability). For most census tracts in the region, about 10 to 20 percent of the population has a disability. Only a few census tracts in the region, in Imperial and surrounding El Centro, have a population with disability less than 10 percent.

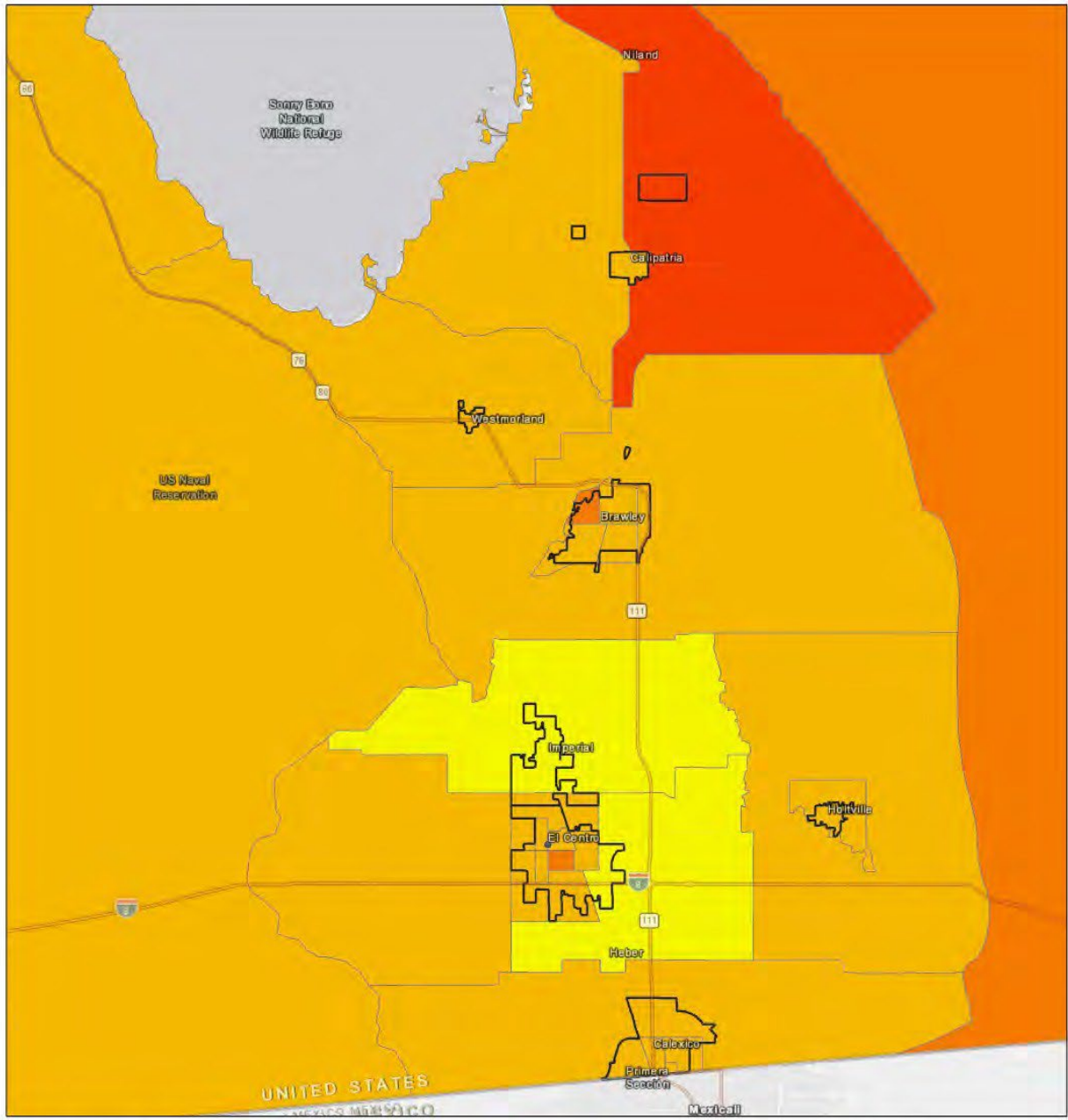
Local Trends

Imperial has the lowest proportion of population with a disability (7.8 percent) in the County significantly lower than Brawley (17.4 percent) and Holtville (16.2 percent). The City also has a lower population of persons with disabilities than the County (14.4 percent). Within the City, the highest concentration of population with disabilities is in the census tract along the southern boundary of the City. In this census tract, between 10 and 20 percent of the population has a disability.

Distribution of RHNA by % Population with Disabilities

As shown in Figure D-7, most census tracts in the City have a population of less than 10 percent of persons with disabilities. Since this concentrated of persons with disabilities is most common, most RHNA units are in tracts where the population of persons with disabilities is less than 10 percent. However, when compared with RHNA unit distribution in Figure D-1, the RHNA units located south of Aten Road are within the census tracts where the population of persons with disabilities ranges from 10 to 20 percent. Additionally, the lower income RHNA units are all within areas of the higher range of persons with disabilities with additional units being in the mixed income (moderate and above moderate) category.

Figure D-6: Population with Disabilities- Region



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City/Town Boundaries

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

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

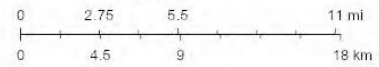
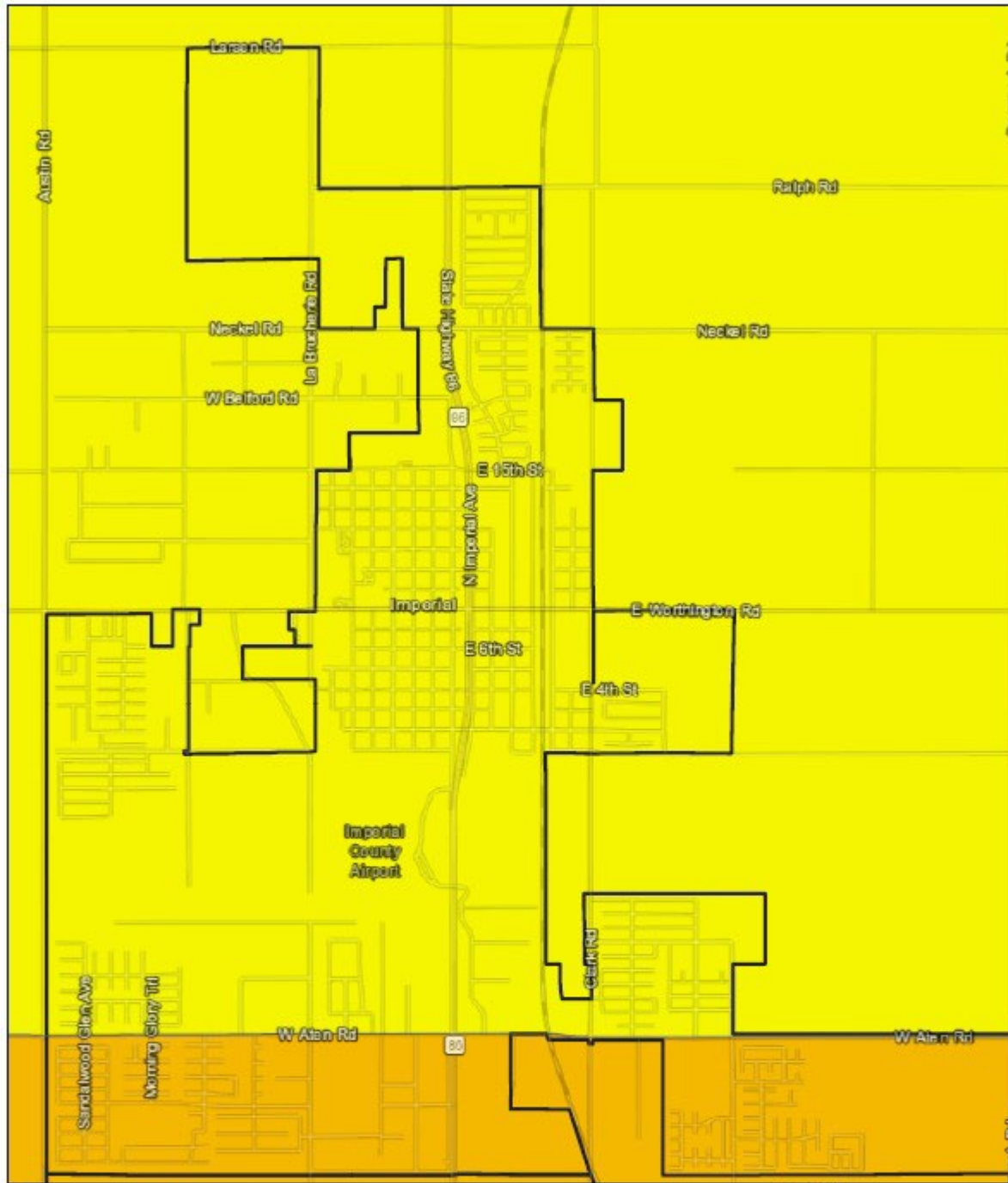


Figure D-7: Concentration of Persons with Disability



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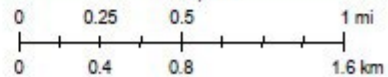
City/Town Boundaries

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

< 10%

10% - 20%

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Familial Status

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

Regional Trends

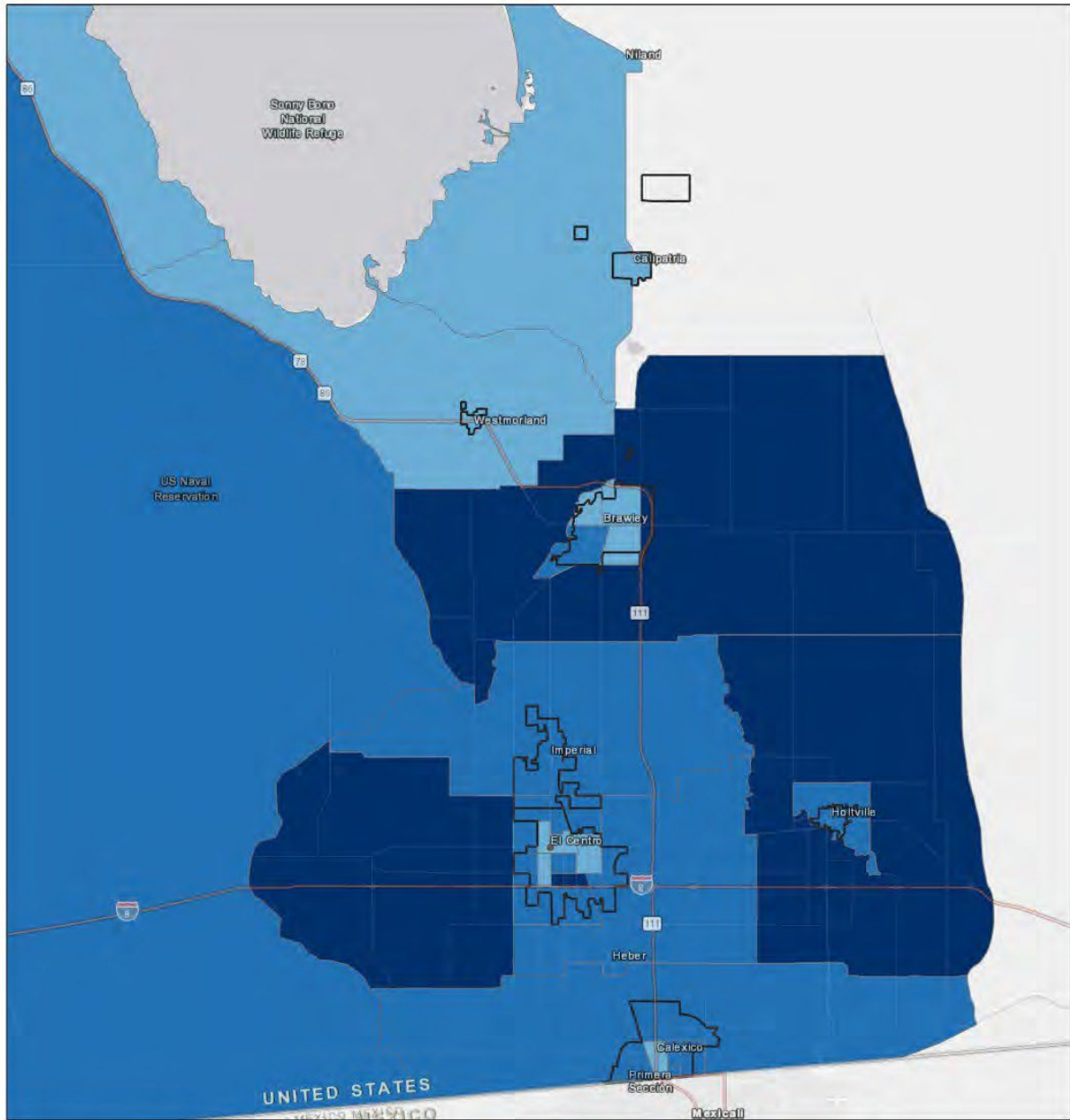
According to the 2015-2019 ACS (Table D-4), 41 percent of households in Imperial County have children under the age of 18. This share is higher than the share of households with children observed in the state (34 percent) and in Los Angeles and San Diego County (33 percent for both). The percentage of households with children in Imperial County range from 41 in Westmorland to 51 percent in Imperial. Imperial County also has a higher percentage of female-headed households with children (62 percent) compared to the state (59 percent) and neighboring counties (55 percent in Los Angeles and 58 percent in San Diego County). Within Imperial County, over 75 percent of households have children in the cities of Brawley, Imperial, and Westmorland.

Table D-4: Household (HH) Types with Children- Region

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

Source: ACS 2015-2019 5-year estimates

Figure D-8: Children in Married Households- Region



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City/Town Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

- 40% - 60%
- 60% - 80%
- > 80%

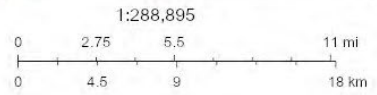
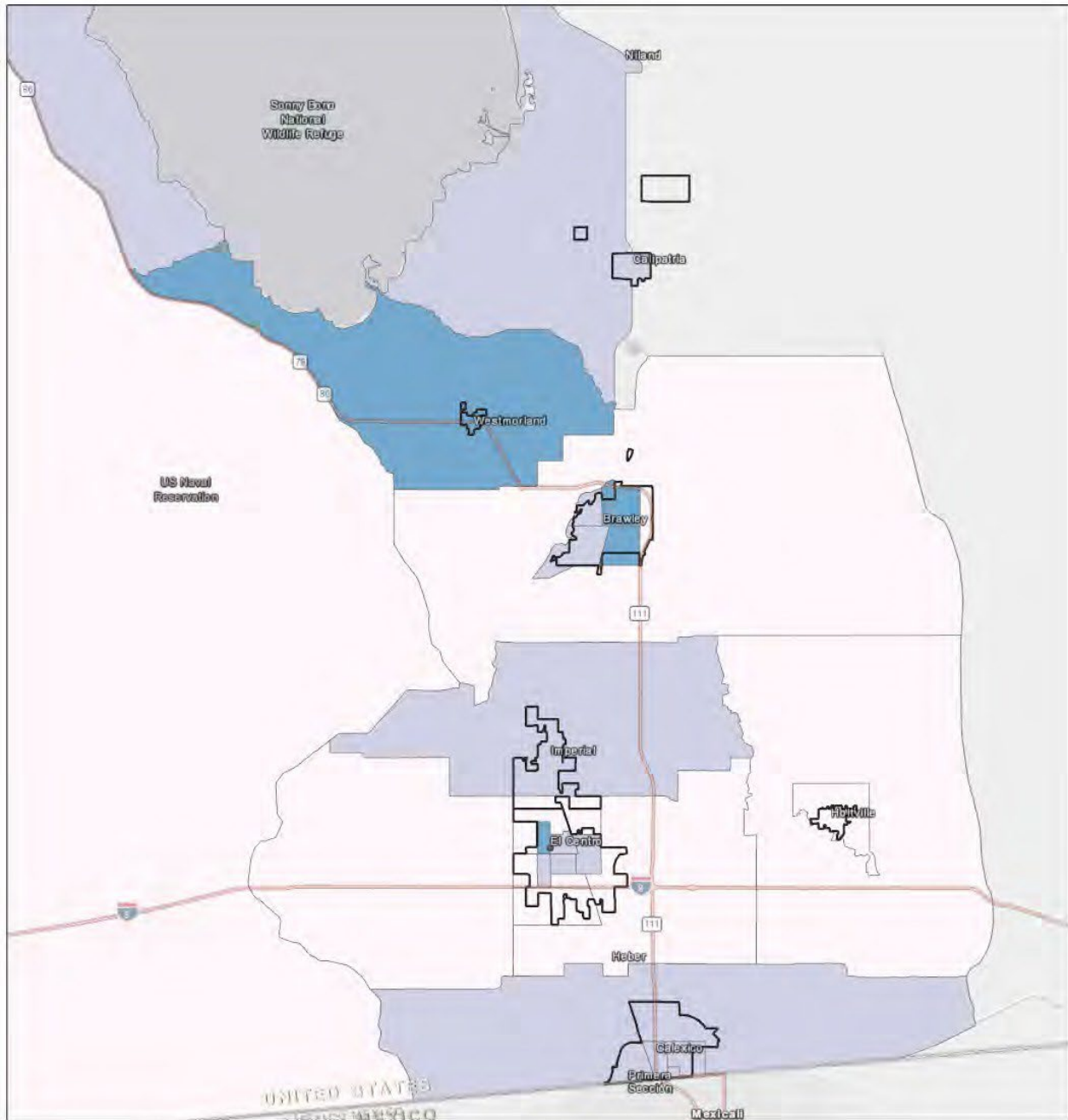


Figure D-9: Children in Single Female-Headed Households- Region



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City/Town Boundaries

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

≤ 20%

20% - 40%

40% - 60%

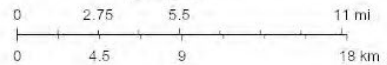


Figure D-8 and Figure D-9 shows the distribution of children in married households and single female headed households in the region. Darker colors indicate a higher percentage of children in married-couple households or single female-headed households per tract. Most census tracts in major jurisdictions like Imperial, Holtville, and Calexico have between 20 and 40 percent of the children population in married-couple households. The highest concentration of children in married people households is found in a few tracts in El Centro. Many census tracts in the eastern and western county appear to have a high concentration of children in married households. It is likely that low population in these areas (which are mainly rural plots) skew the percentages. While children in married-households appear to be uniform across most of the County's jurisdictions, children in female headed households are more notably concentrated in El Centro and Brawley (Figure D- 9).

Local Trends

Approximately 51 percent of households in Imperial have children, higher than the surrounding jurisdictions of El Centro (42 percent), Calexico (46 percent), and Brawley (45 percent). According to the HCD AFFH map in Figure D-10, the entire City has a range of 60 to 80 percentage of children in married households. Figure D-11 shows that a majority of the City contains 20 to 40 percent of children in single female-headed households. South of Aten Road, the percentage of children in single female-headed households is less than 20 percent.

Distribution of RHNA Units by Familial Status

As shown in Figure D-1, RHNA units are distributed throughout the City, with lower income units located at the southern most area of the City and above moderate income units along the western boundary in the central portion of the City. In terms of familial status, all RHNA units are in tracts that have between 60 and 80 percent of its children population in married households. Lower income units are in the southern portion of the City where the lowest concentration of children in single female-headed households are located.

Income Level

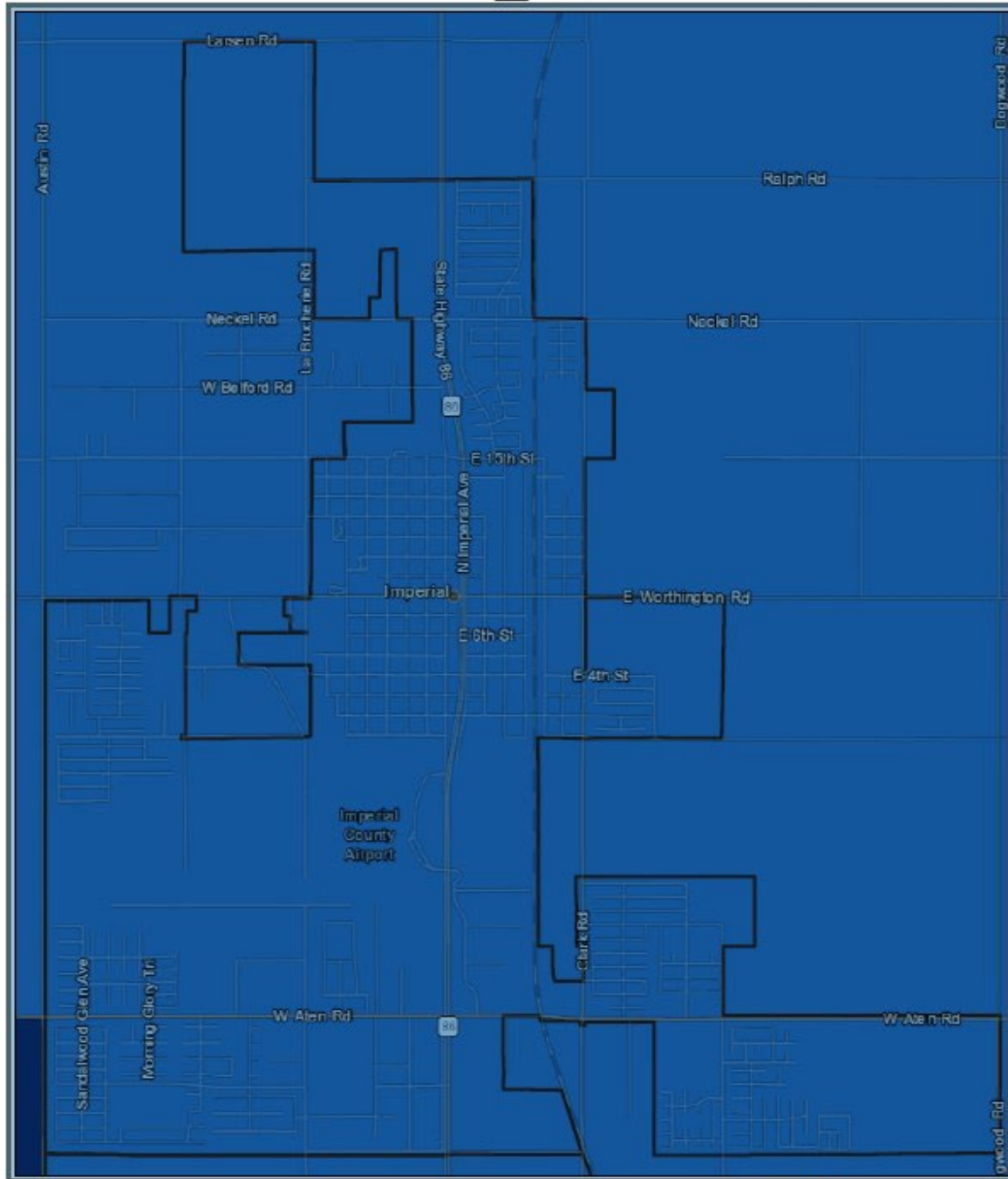
Household income is the key determinant of ability to pay for housing. For many households, their income is too limited to afford existing housing. A larger number of households have incomes too low to afford new housing, as new housing is usually more expensive than existing housing.

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

Regional Trends

According to 2013-2017 CHAS data, 49 percent of Imperial County's households earn low and moderate income. This is a higher percentage than observed in San Diego County (43 percent) and statewide (44 percent) but lower than Los Angeles County (52 percent). Figure D-12 shows that LMI population is concentrated in tracts within the major jurisdictions of the County. However, in the cities of Westmorland, Calipatria, and Holtville, between 50 and 75 percent of the population earns low and moderate incomes in all their tracts. In Brawley, El Centro, and Calexico, the percentage of LMI population per block group varies within the city boundaries, with the percentage of LMI populating ranging from less than 25 to over 80 percent.

Figure D-10: Children in Married-Couple Households - City of Imperial



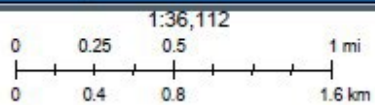
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City/Town Boundaries

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

60% - 80%

> 80%

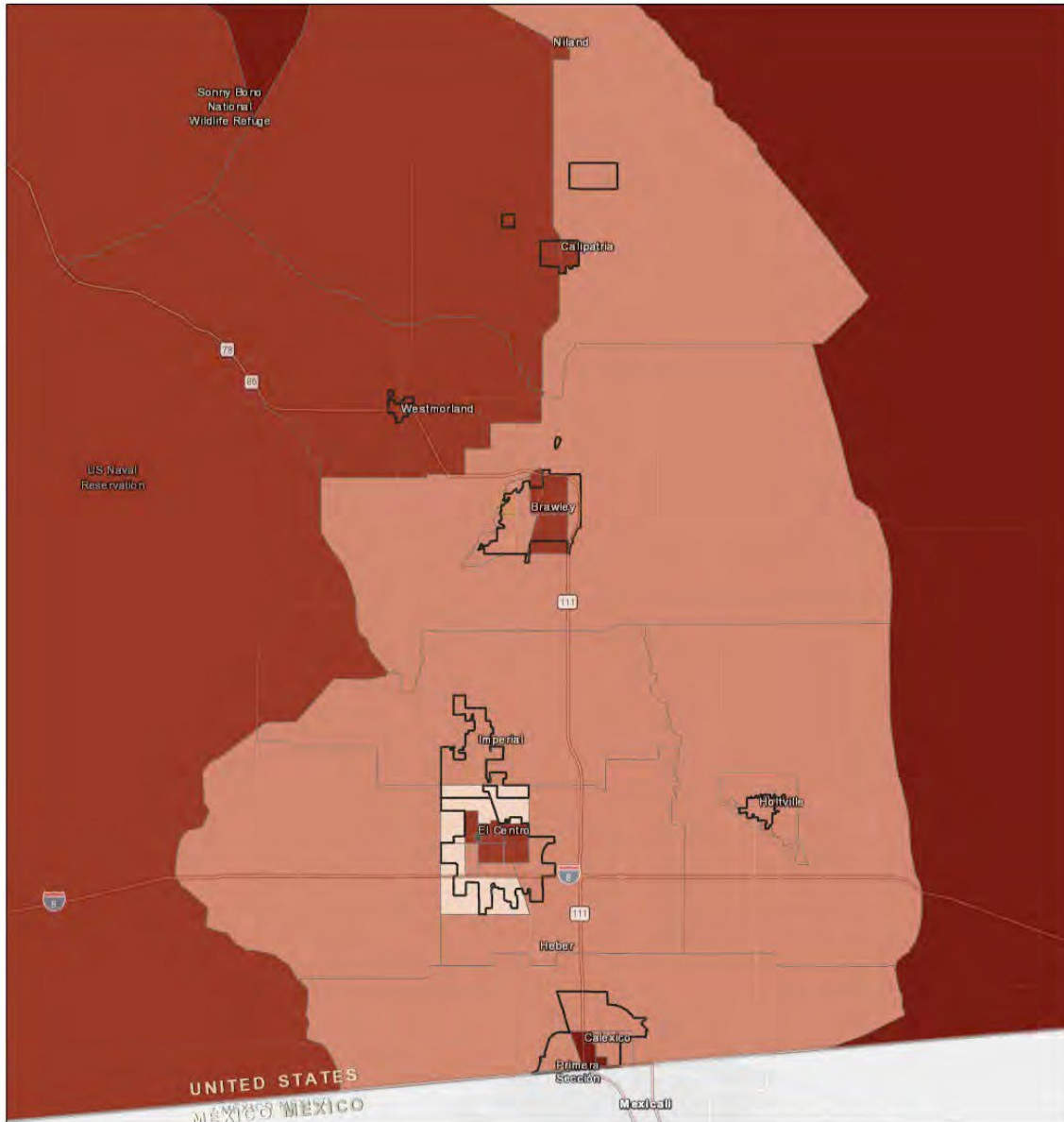


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Figure D-12: Low and Moderate Income Population – Region



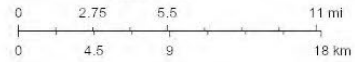
8/13/2021, 5:12:03 PM

City/Town Boundaries

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

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

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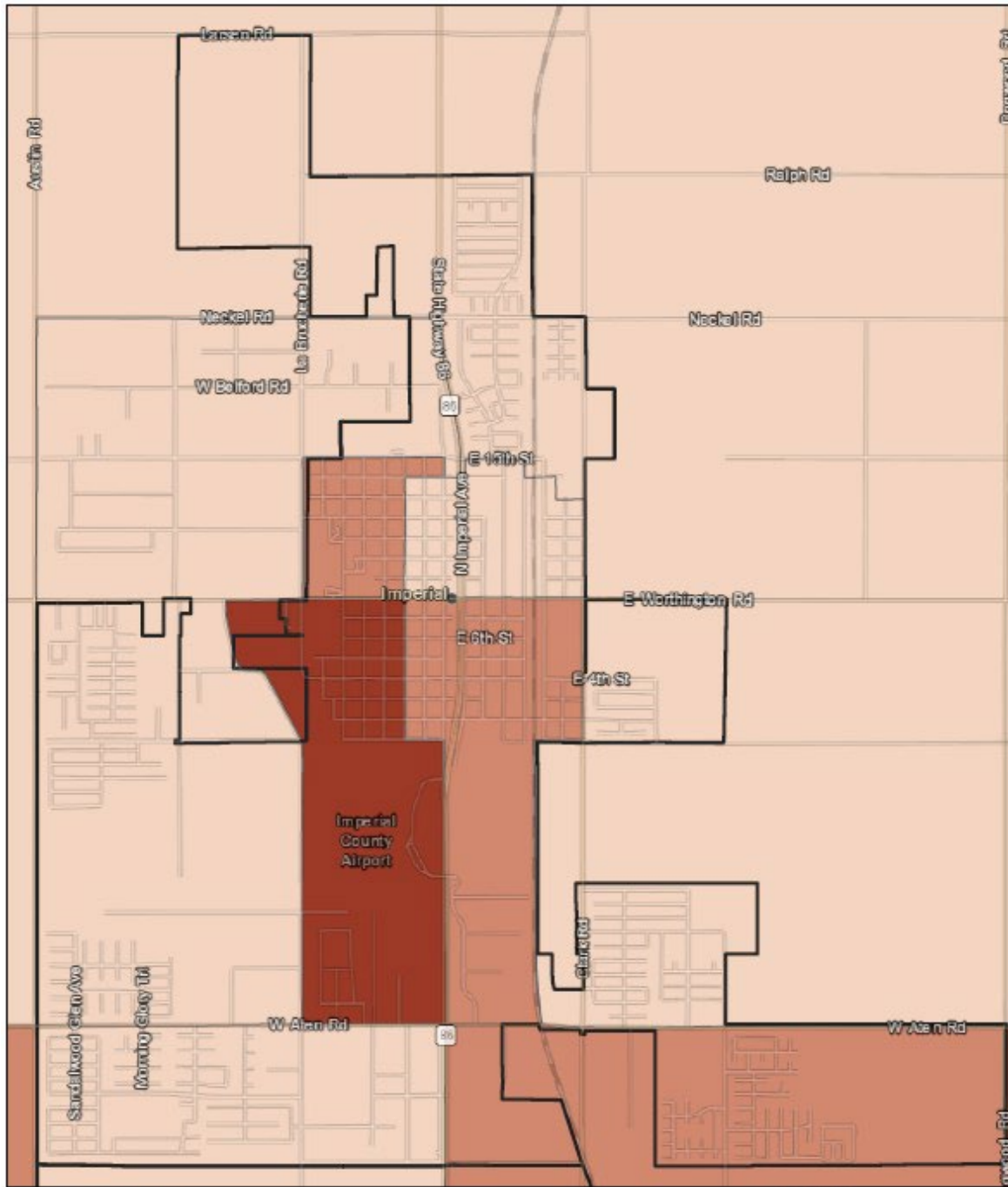


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Figure D-13: Low and Moderate Income Population- City of Imperial

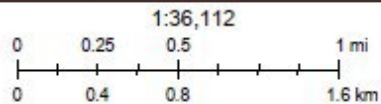


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City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Block Group

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



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Local Trends

The City's LMI population (11.4 percent) is significantly lower than the County's (48.8 percent). As seen in Figure D-13, the City of Imperial has one census tract with a high percentage (50 and 75 percent) of LMI population. This tract is located in the center of the City and includes the Imperial County Airport and surrounding streets to the north and south of the airport. Additionally, this tract is shown by the HUD AFFH Data Viewer database as having only 51% of the population that falls into the LMI category. Census tracts with the second highest concentration of LMI population (where 25 to 50 percent of the population earns low and moderate incomes) are concentrated in the central-eastern and southeastern tracts in the City.

Distribution of RHNA Units by % Low and Moderate Income Population

As shown in Figure D-1, RHNA units are distributed similarly in census tracts that have less than 25 percent LMI population and tracts that have 25 to 50 percent LMI population. This makes sense given that most census tracts fall into either one of these two categories. As shown in Figure D-1, in an effort to encourage mixed-income neighborhoods, a majority of lower income units are located in census tracts with the lowest percent of LMI persons (less than 25 percent). None of the RHNA units are sited in tracts with the highest concentration of LMI persons.

C. Racially and Ethnically Concentrated Areas

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

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

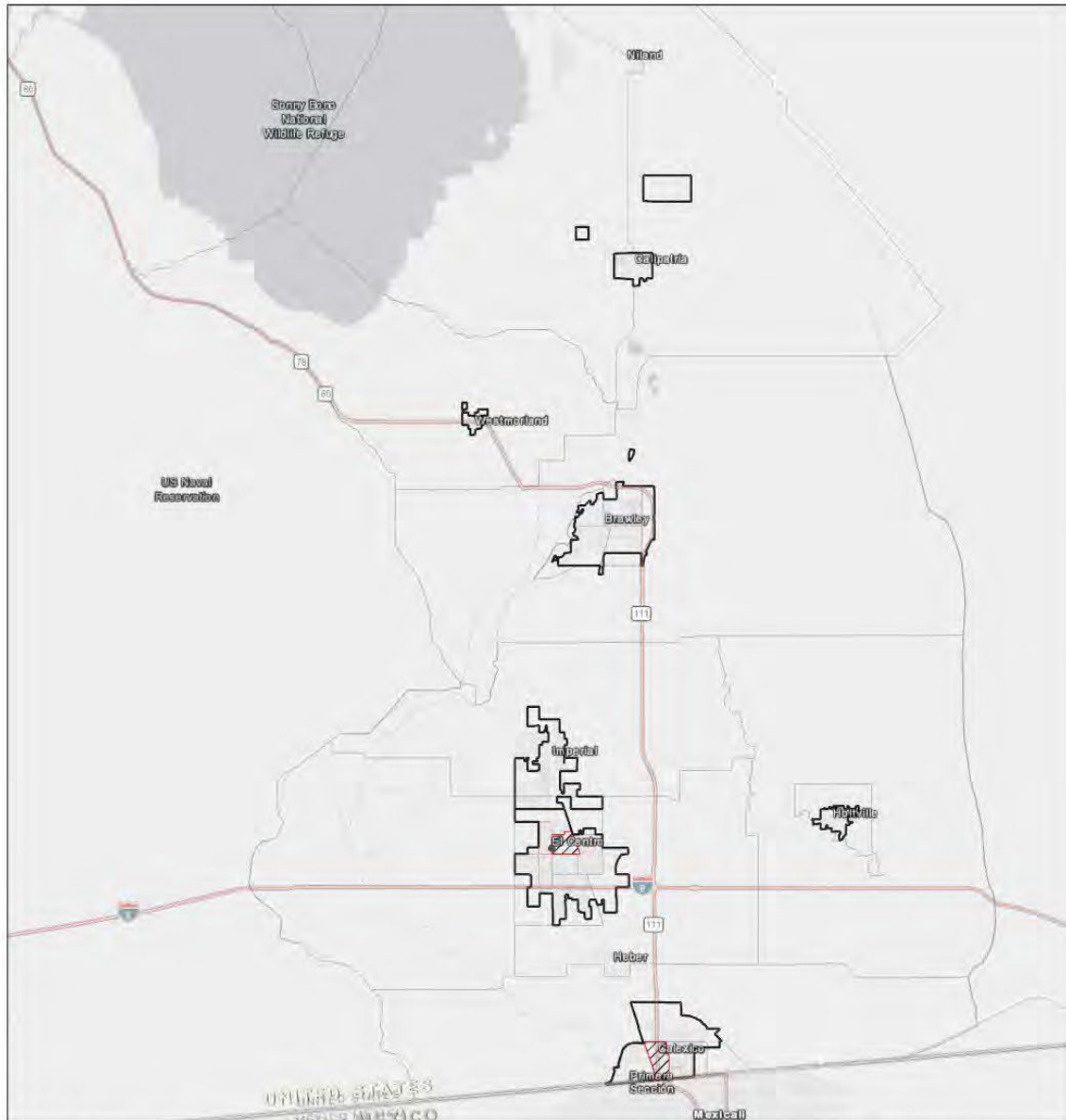
Regional Trends

There are two R/ECAPs located within the County- in Calexico and El Centro (Figure D-14).

Local Trends

There are no R/ECAP identified in the City of Imperial. Additionally, as shown in Figure D-15, there are no tracts identified as having poverty within the limits.

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



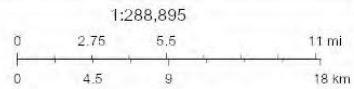
8/5/2021, 6:06:24 PM

City/Town Boundaries

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

0 - Not a R/ECAP

1 - R/ECAP

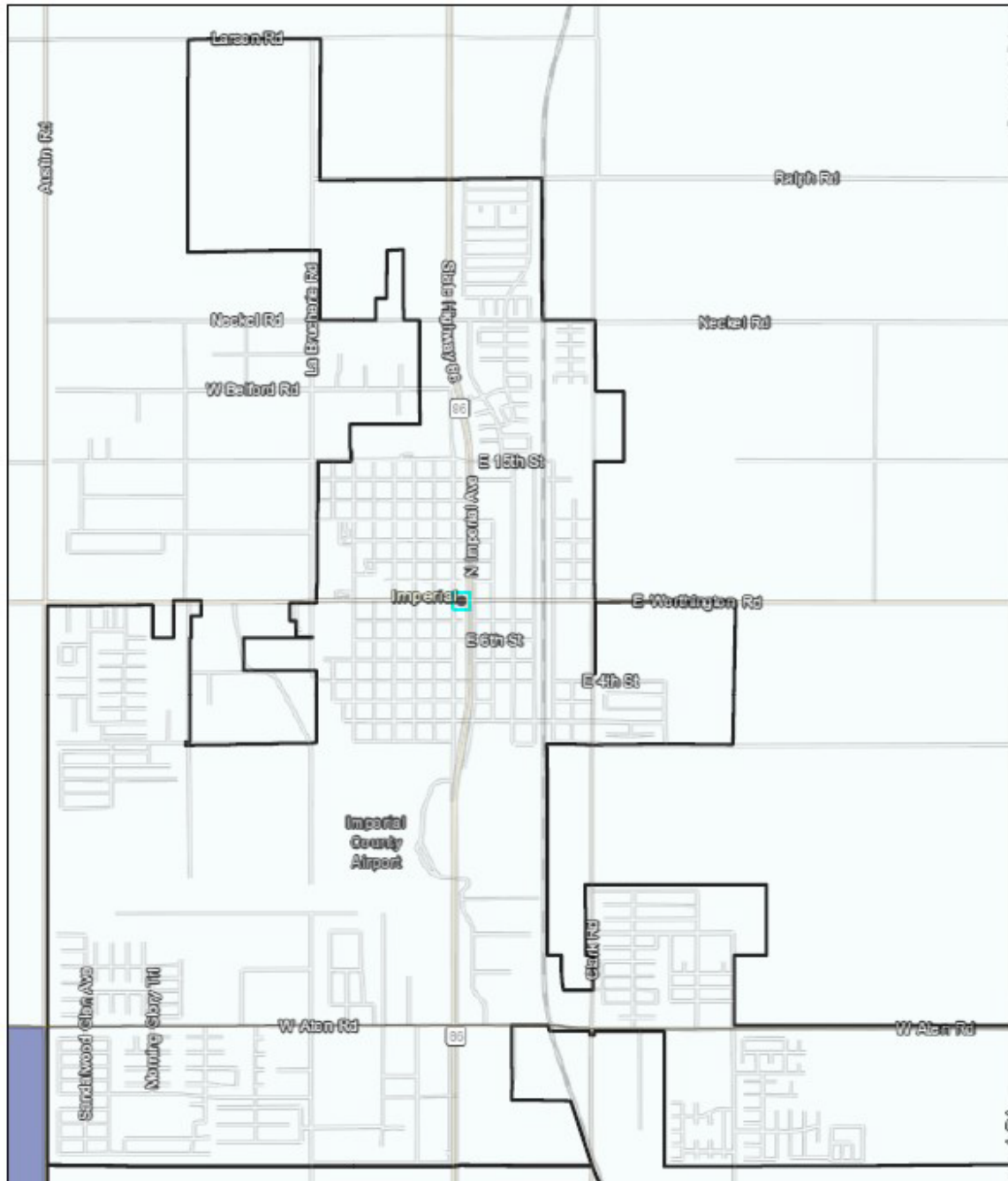


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Figure D-15: Poverty Status by Tract- City of Imperial



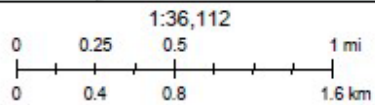
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City/Town Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

< 10%

20% - 30%



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Racially Concentrated Areas of Affluence (RCAAs)

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

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

Regional Trends

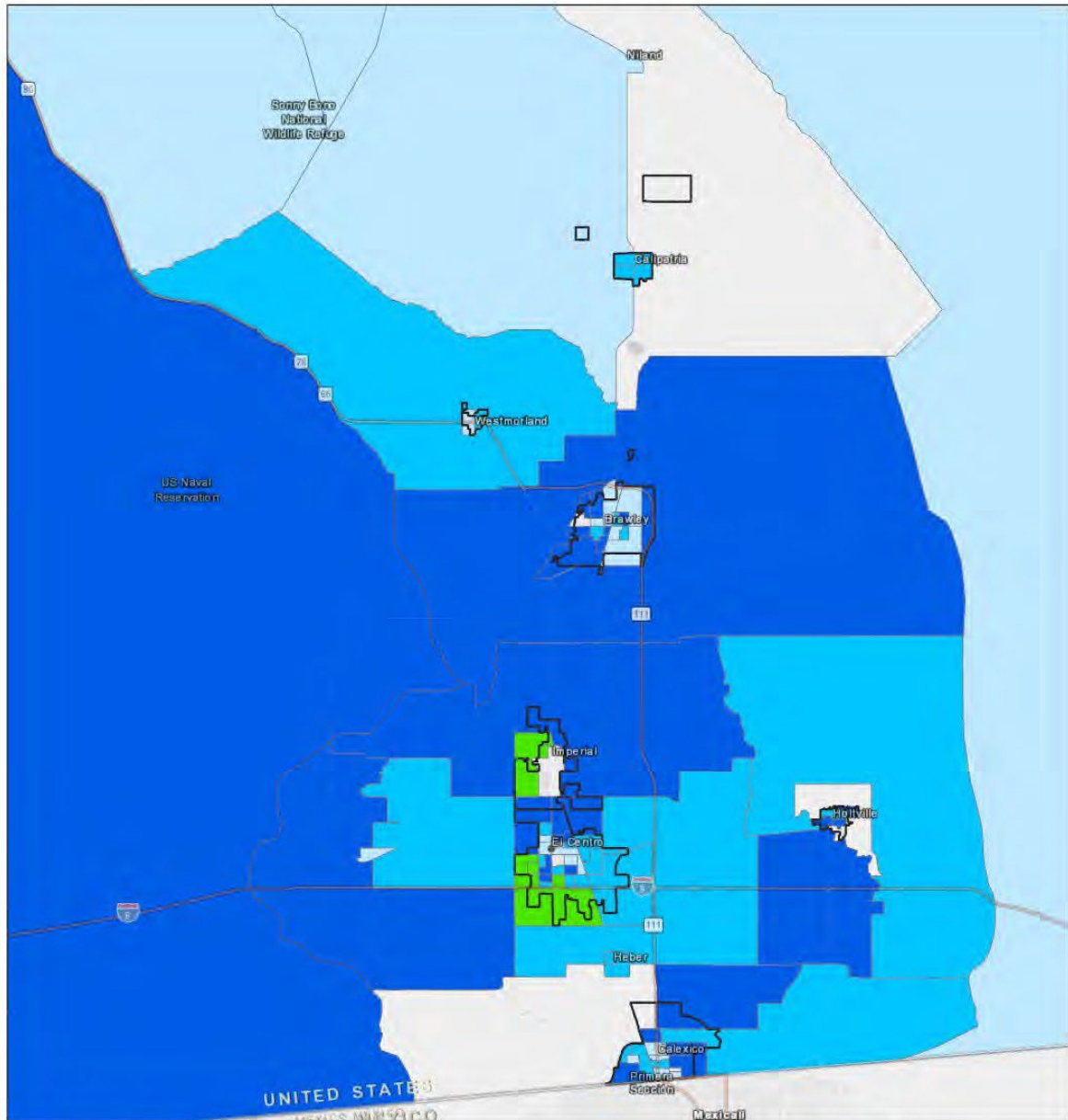
Figure D-2 and Table D-1 show that Imperial County has a predominantly Hispanic population. Most block groups have at least 41 percent non-white minority population. This means that in block groups where White population has its highest shares (orange block groups, where minority is the lowest in the region and ranges from 41 to 60 percent), the maximum percentage white population in these block groups is only 59 percent.

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

Local Trends

As discussed previously in the Race/Ethnicity section, none of the block groups in the City have census tracts that have over 80 percent White population. The City does have block groups along its western border with median incomes over \$125,000 (Figure D-17). However, no block group meets the definition of RCAAs.

Figure D-16: Median Income – Region



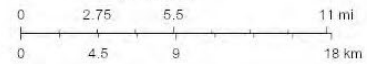
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City/Town Boundaries

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

- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000

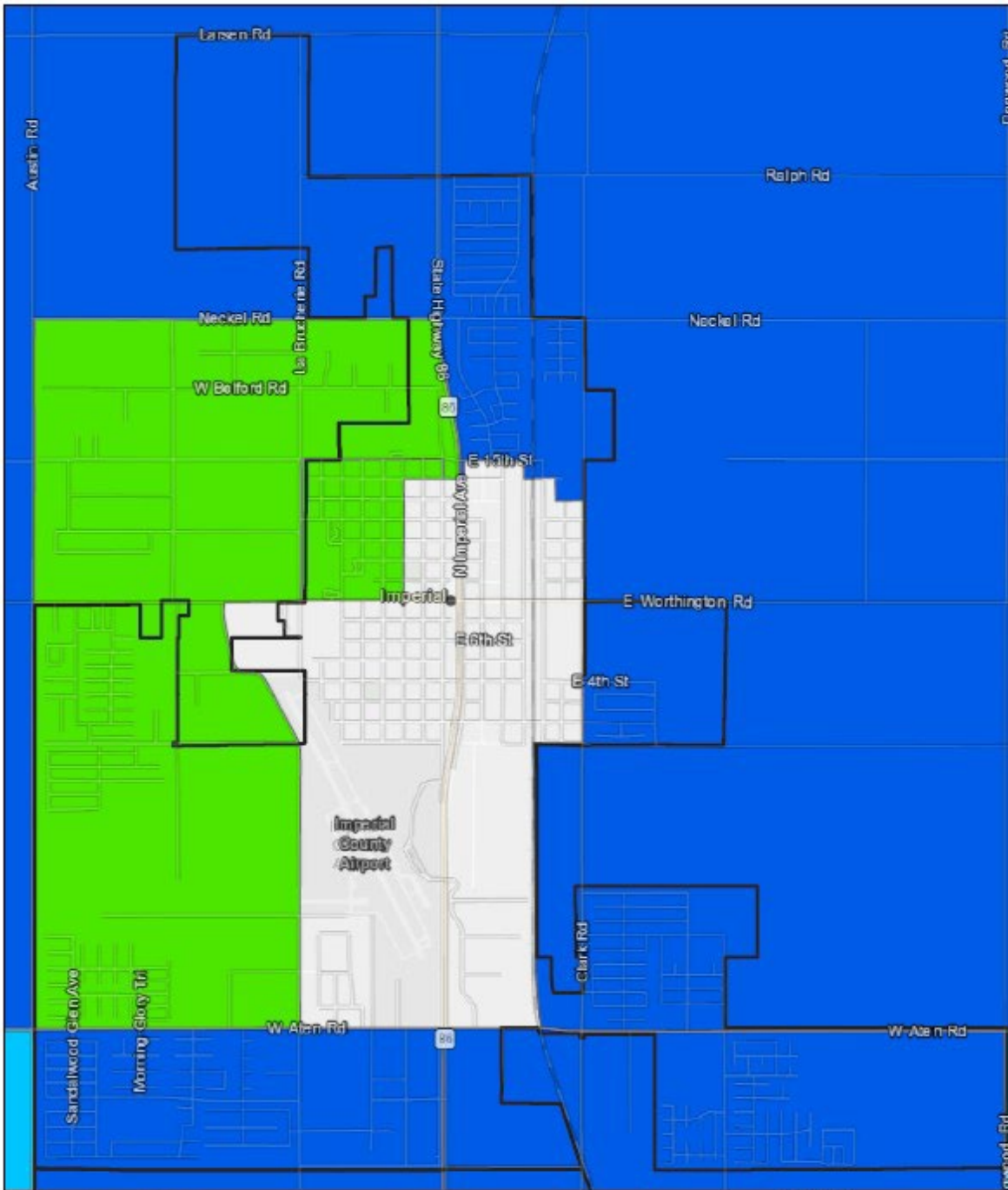
1:288,895



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Figure D- 17: Median Income - City of Imperial



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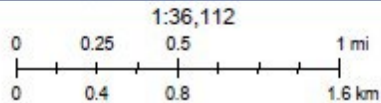
City/Town Boundaries

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

< \$55,000

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

< \$125,000



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D. Access to Opportunities

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

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resource levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table D-5 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

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

Table D-5: Domains and List of Indicators for Opportunity Maps

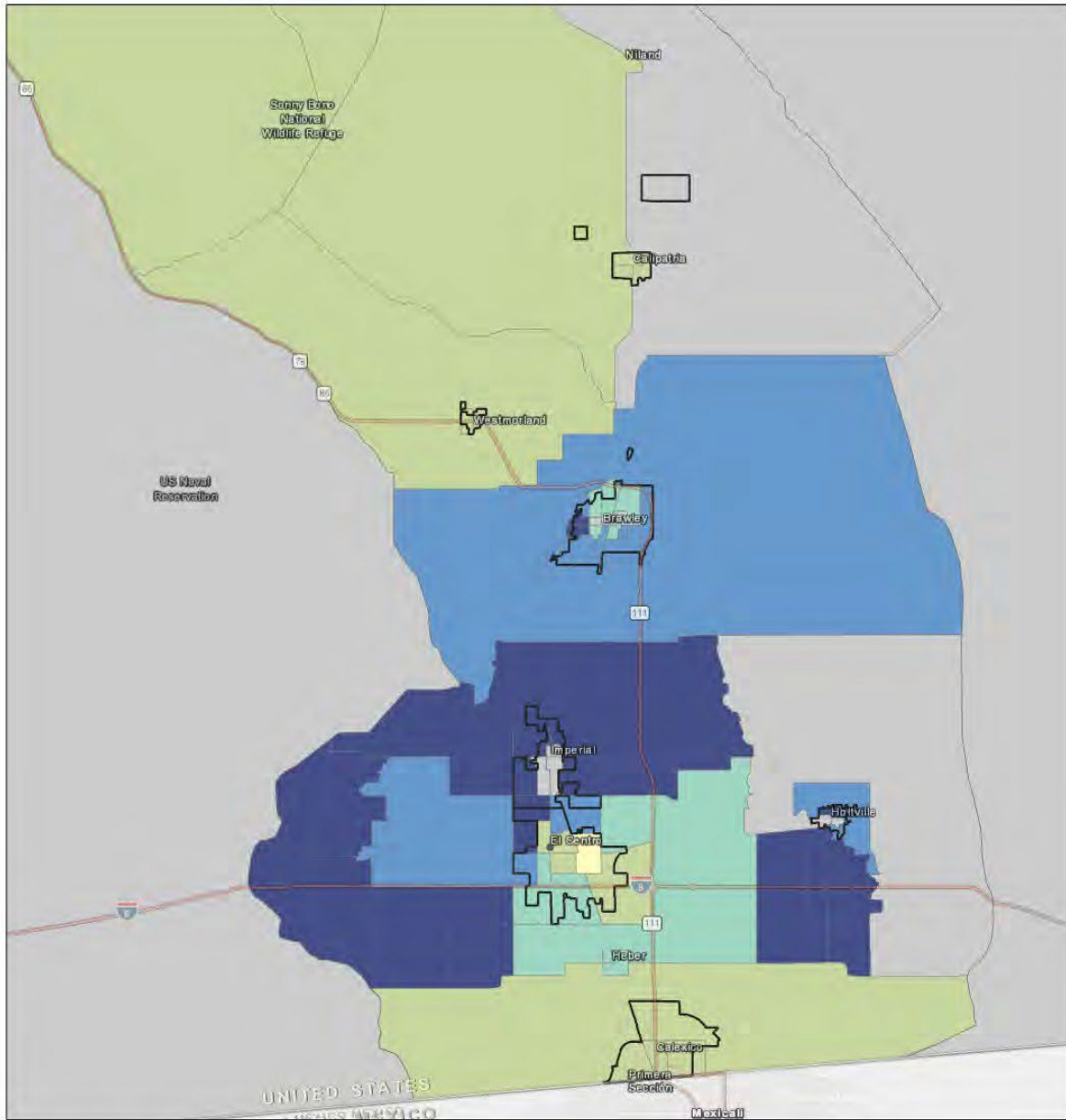
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

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

Regional Trends

According to the 2021 TCAC/HCD opportunity area map, one census tract in the region is considered “high segregation and poverty” areas (Figure D- 18). This census tract is located in El Centro. TCAC maps categorize the level of resources in each census tract. Categorization is based on percentile rankings for census tracts within the region. Regionally, low resource areas (green) are concentrated in the southern tracts of County, along the US-Mexico border as well as some census tracts in El Centro. The middle tracts of the County, surrounding Imperial and Brawley have high resources. Census tracts between Calexico and El Centro have moderate resources.

Figure D-18: TCAC Composite Scores- Region



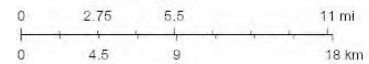
8/5/2021, 6:11:41 PM

City/Town Boundaries

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

- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

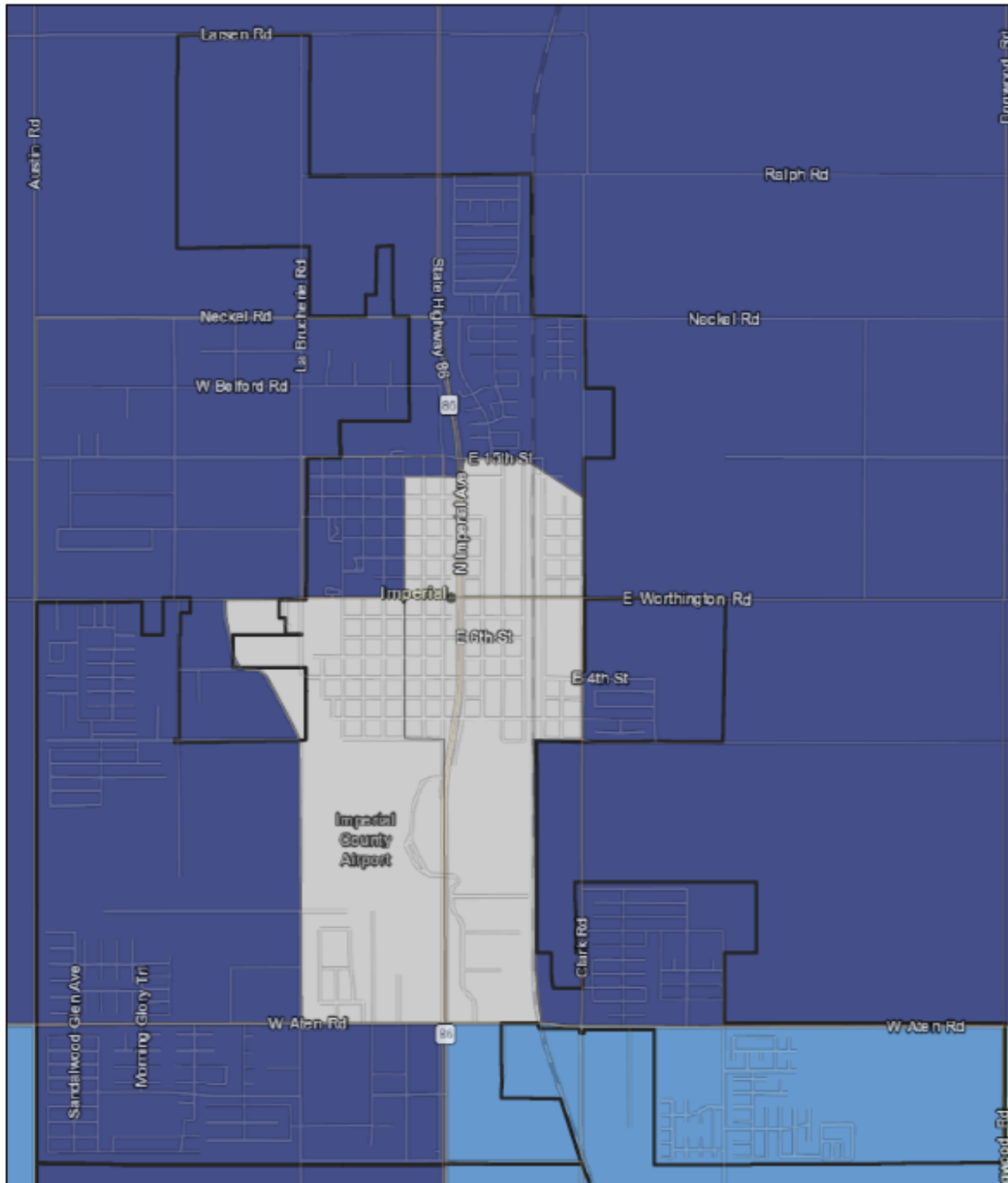
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Figure D-19: TCAC Opportunity Areas- City of Imperial



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City/Town Boundaries

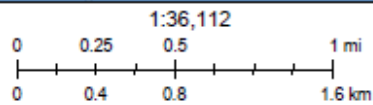
(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

Highest Resource

High Resource

Moderate Resource

Missing/Insufficient Data



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Local Trends

According to the HCD/TCAC opportunity map (Figure D-19), Imperial is made up of mostly census tracts with the highest level of resources. As previously stated, the census tracts within the central portion of the City are missing or have insufficient data. Southeastern census tracts shared with El Centro scored lower but are still identified as in the high resource category.

Distribution of RHNA Units by TCAC Opportunity Area

When Figure D-19 is compared with Figure D-1, it can be shown that a majority of Imperial's RHNA units are located in the highest resource areas with a portion of the RHNA units located in the southeastern part of the City still located in the high resource tracts.

Opportunity Indices

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Imperial residents' access to key opportunity assets in comparison to the County. Table D-6 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

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

exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

Table D-6 below displays the opportunity indices by race and ethnicity for persons in El Centro and for the County. The City of Imperial does not have its own analysis; however, El Centro can act as a good indicator of conditions in the City.

Table D-6: Opportunity Indices by Race/Ethnicity- Imperial County and City of El Centro

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

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

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

Education

Regional Trends

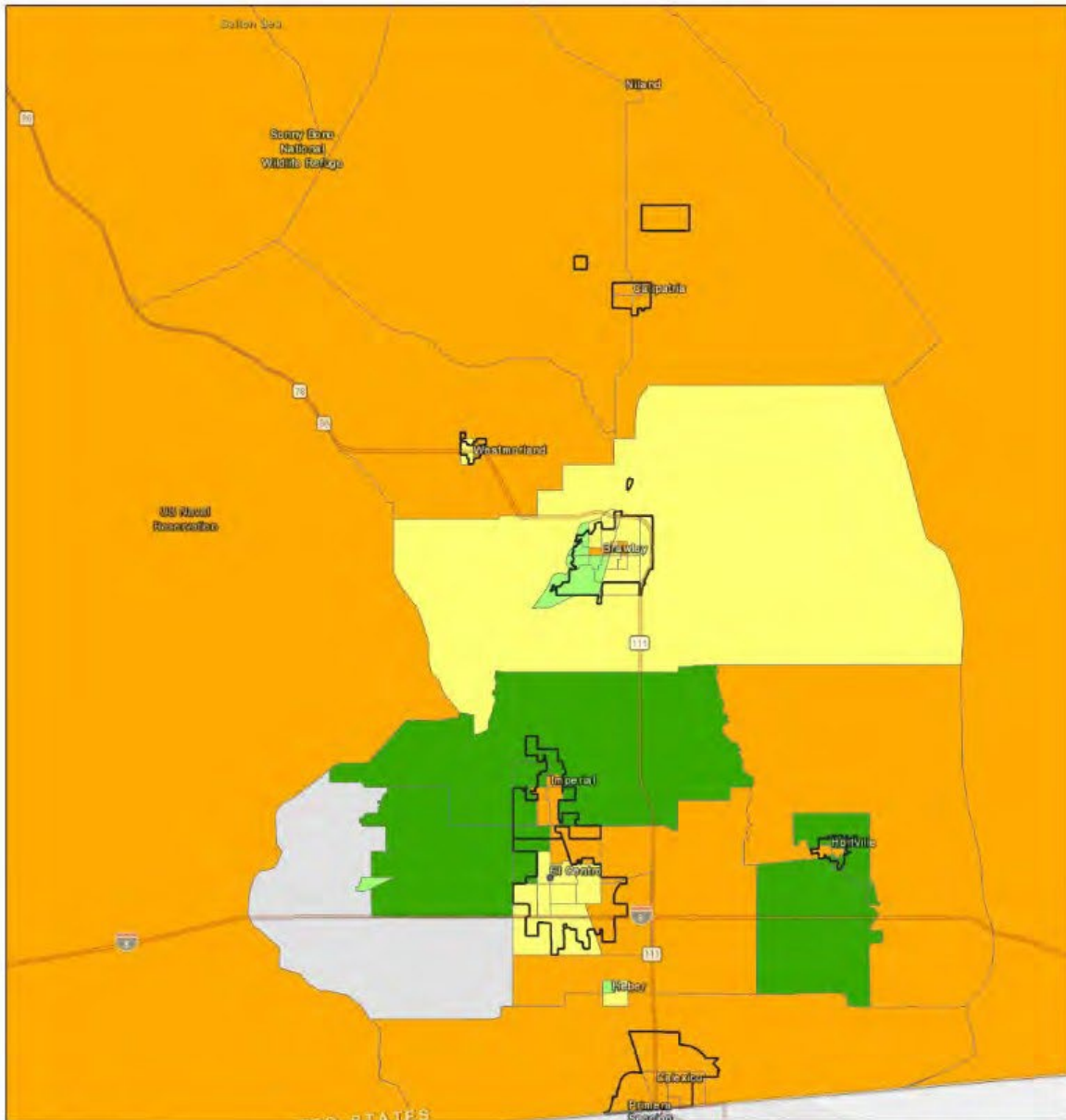
School proficiency scores are indicators of school system quality, with higher scores indicating higher school quality. In Imperial County, White, Black, and Asian residents have access to better schools (scores 46 to 34, with Black residents scoring highest) compared to Hispanic and Native American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

The HCD/TCAC education scores for the region show the distribution of education quality based on education outcomes (Figure D-20). Lower education scores are found in Brawley and surrounding areas as well as El Centro and Heber. Higher education scores are prominent in the edges of and surrounding areas of the cities of Imperial and Holtville.

Local Trends

Greatschools.org is a non-profit organization that rates schools across the United States. The Great Schools Summary Rating calculation is based on four ratings: Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average”, 5-6 indicate “average”, and 7-10 are “above average.” Figure D-21 shows that most of Imperial’s elementary, middle, and high schools scored in the average range. Only one school (Imperial High) in the center of the city scored as above average. These average scores correspond with the TCAC’s Education Score map for the City on Figure D-22. Approximately half of the city’s census tracts had higher education scores (more than 0.75 out of one), with the central and southeastern portions of the City receiving scores that are less positive outcomes.

Figure D-20: TCAC Education Scores- Region



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City/Town Boundaries

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

< 0.25 (Less Positive Education Outcomes)

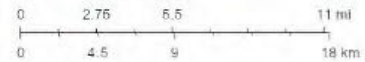
0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)

No Data

1:288,895



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Figure D-21: GreatSchools Ratings

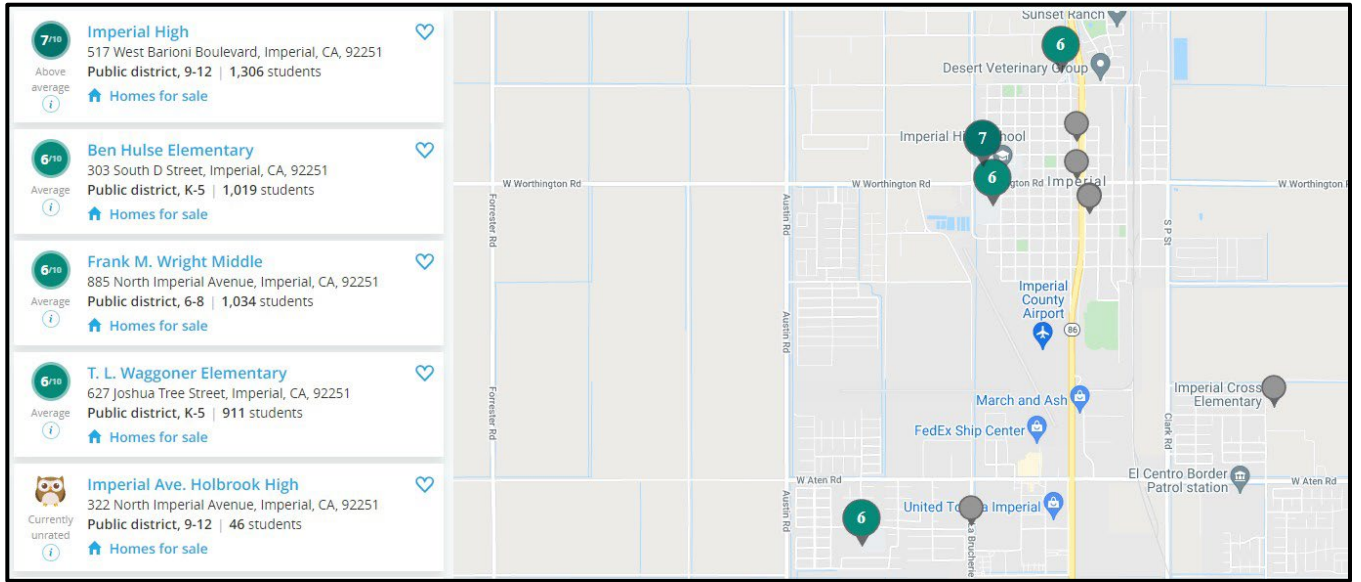
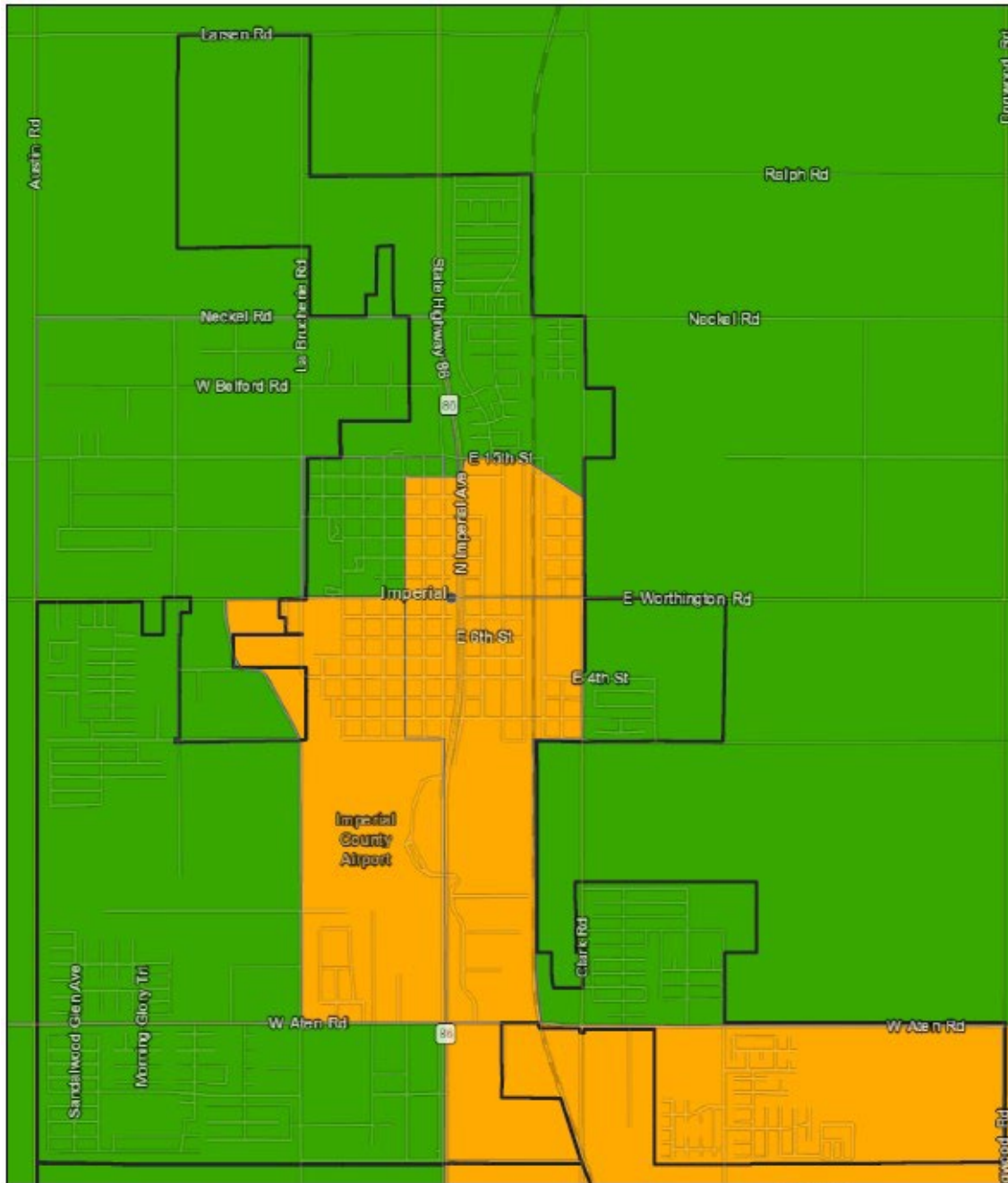


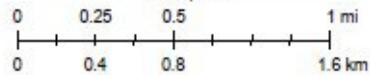
Figure D- 22: TCAC Education Score- City of Imperial



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City/Town Boundaries



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

< 0.25 (Less Positive Education Outcomes)

> 0.75 (More Positive Education Outcomes)

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Transportation

Regional Trends

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

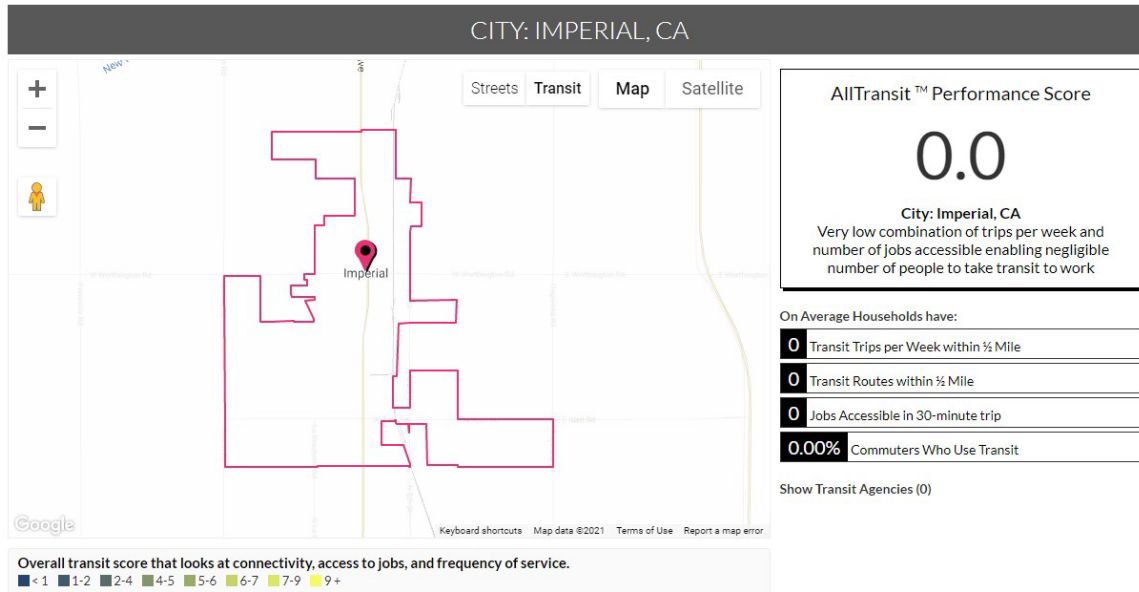
Low transportation cost scores had a small range from 11 to 16 across all races and were slightly higher for residents living below the poverty line (range 15 to 27). The total Hispanic population had the highest low transportation costs but Hispanics living in poverty had the among the lowest. Considering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

Local Trends

Although transit scores are not available for the City of Imperial, transit index scores within the City of El Centro were higher than the County's, ranging from 37 to 44, with Native American and Hispanic residents scoring highest and Whites and Blacks scoring lowest. For residents living below the poverty line, scores were higher for most races, but lower for Native American residents) indicating lower likelihood to use public transit. For low transportation cost indices, scores in the City of El Centro were higher than the County (ranging from 19 to 27) and were in the higher range for residents living below the federal poverty line (23 to 33). Among the races, White and Asian residents scored lowest for the population but highest when living in poverty. The assessment for El Centro has value for considerations for Imperial because the Cities are adjacent and share the same transit resources.

AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), shown on Figures D-23, Imperial has the very low AllTransit Performance Score of 0.0 (out of 10). Although not noted on the AllTransit website, this score is likely attributed to the lack of data contained in the AFFH-T database reflected in Table D-6 Opportunities Indices.

Figure D-23: AllTransit Score- City of Imperial



Economic Development

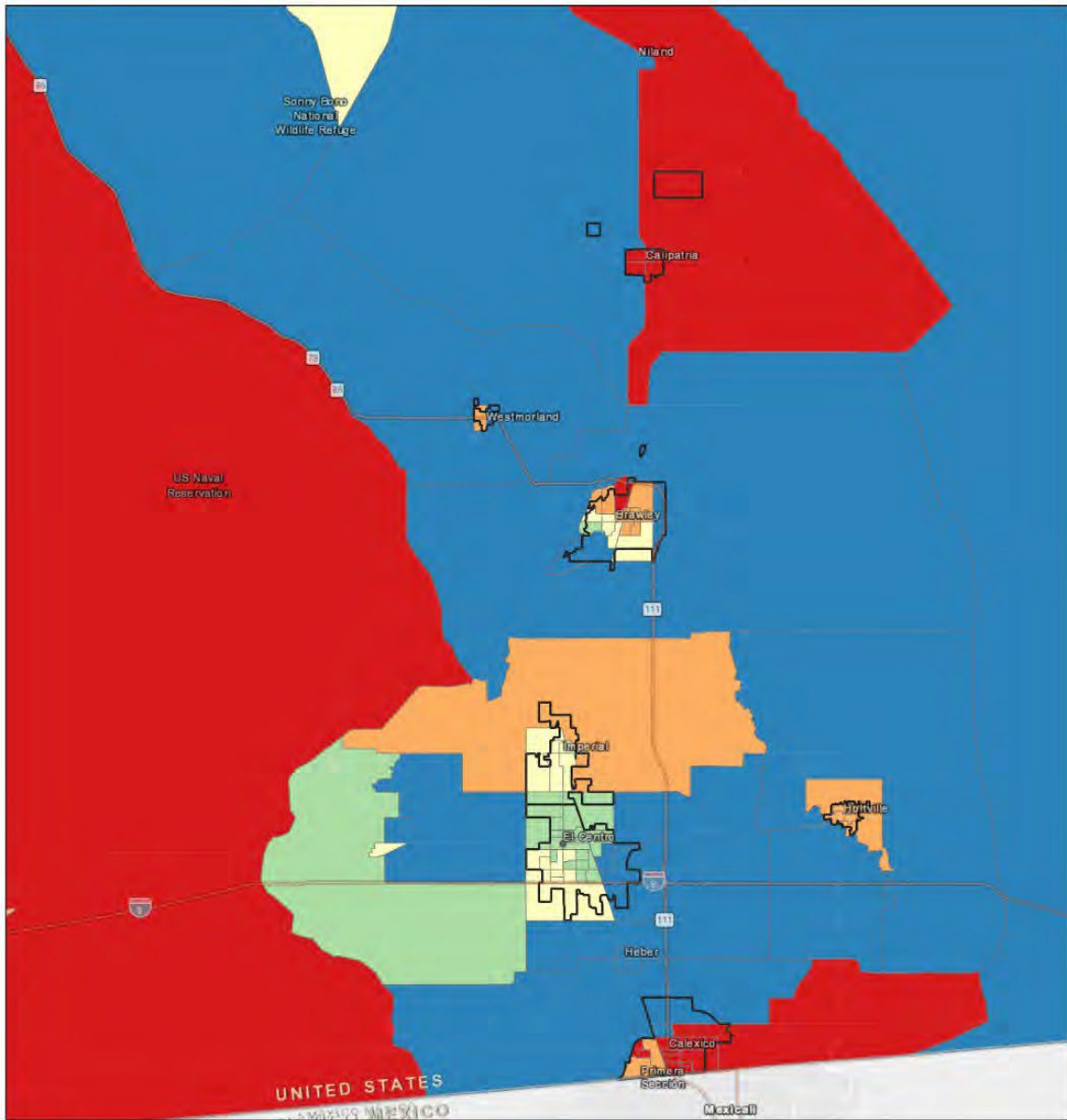
Regional Trends

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

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

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

Figure D-24: Jobs Proximity Index- Region



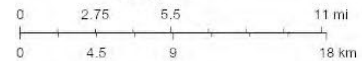
8/13/2021, 6:41:07 PM

City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)

1:288,895

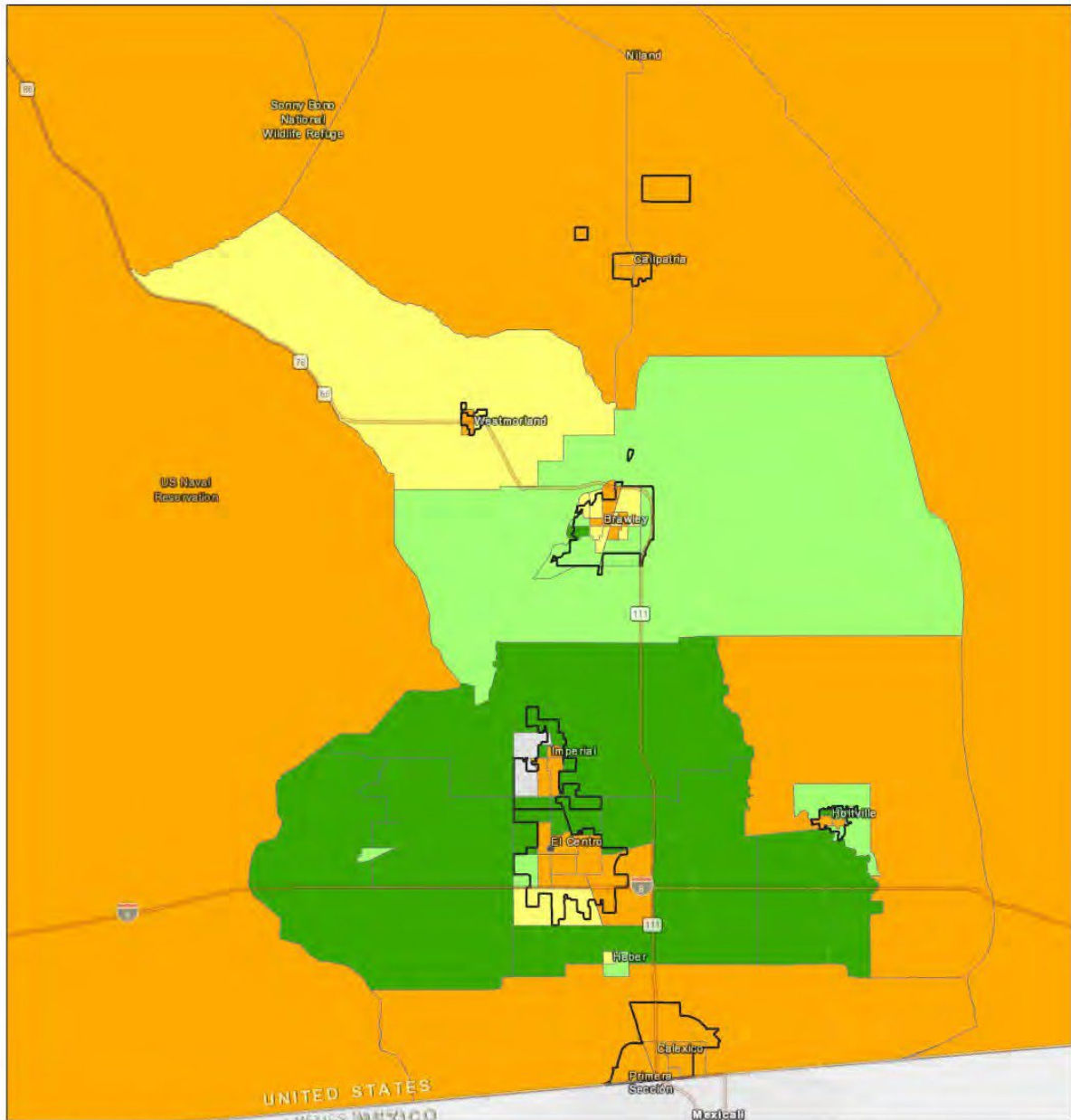


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Figure D-25: TCAC Economic Score- Region



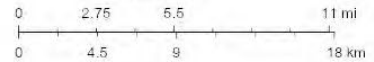
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City/Town Boundaries

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

- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

1:288,895



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CAHCD

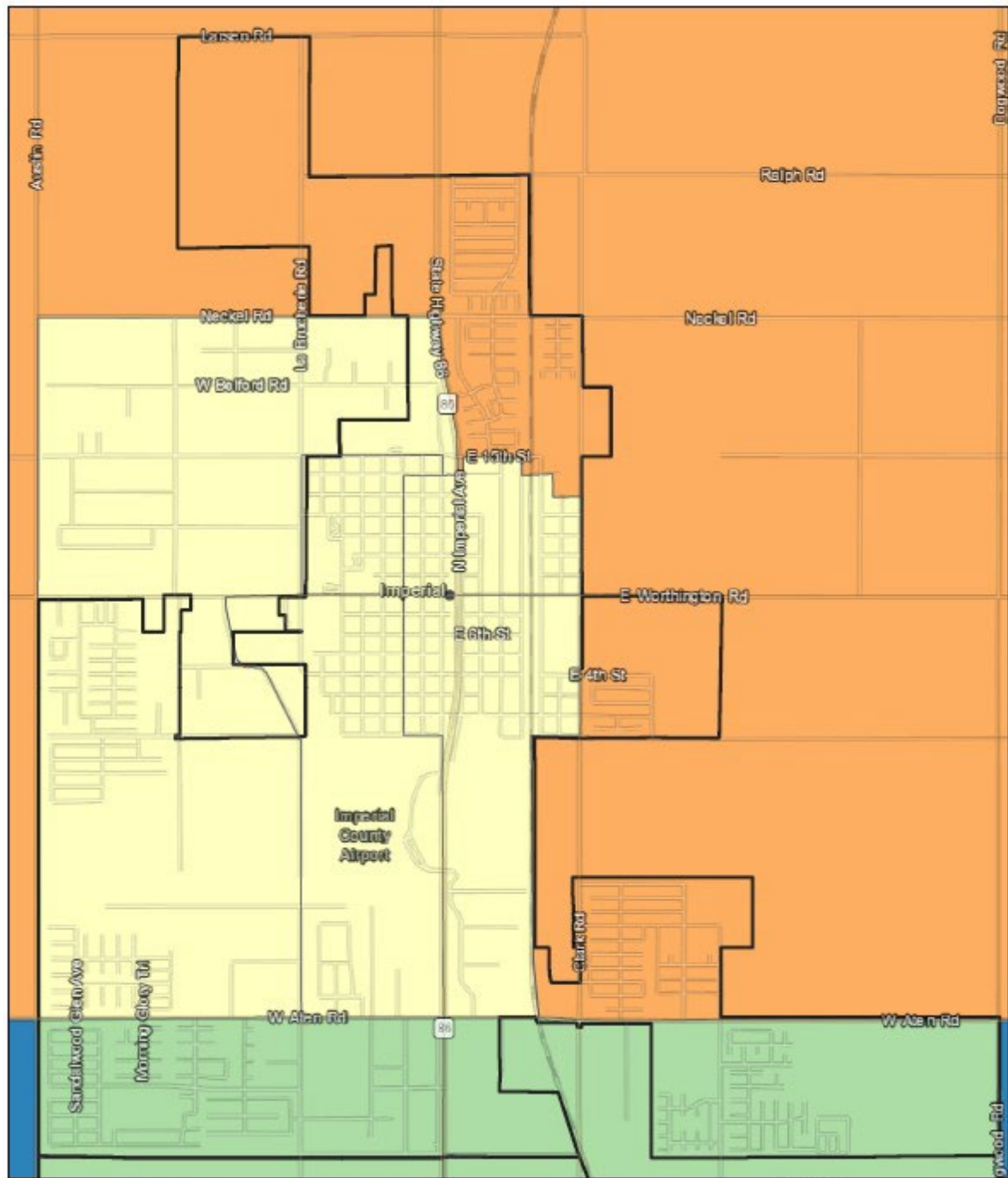
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Local Trends

The map in Figure D-26 shows the distribution of job indices within the City. The northern and eastern census tracts scored the lowest, central tracts scored in the mid-range, and southern census tracts scored highest. This trend is likely due to a higher concentration of jobs in El Centro which is adjacent to the south of Imperial.

The TCAC Economic score map in Figure D-27, incorporate jobs proximity as well as poverty, adult education, employment, and median home value characteristics of the area. Once other economic characteristics are incorporated, the map shows that the central portion of the City has the least positive economic outcome while the outskirts of the City are shown to have a more positive economic outcome. No data is provided for the western central portion of the City.

Figure D-26: Jobs Proximity Index – City of Imperial



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City/Town Boundaries

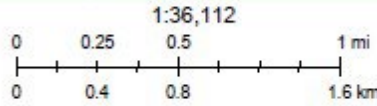
(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

20 - 40

40 - 60

60 - 80

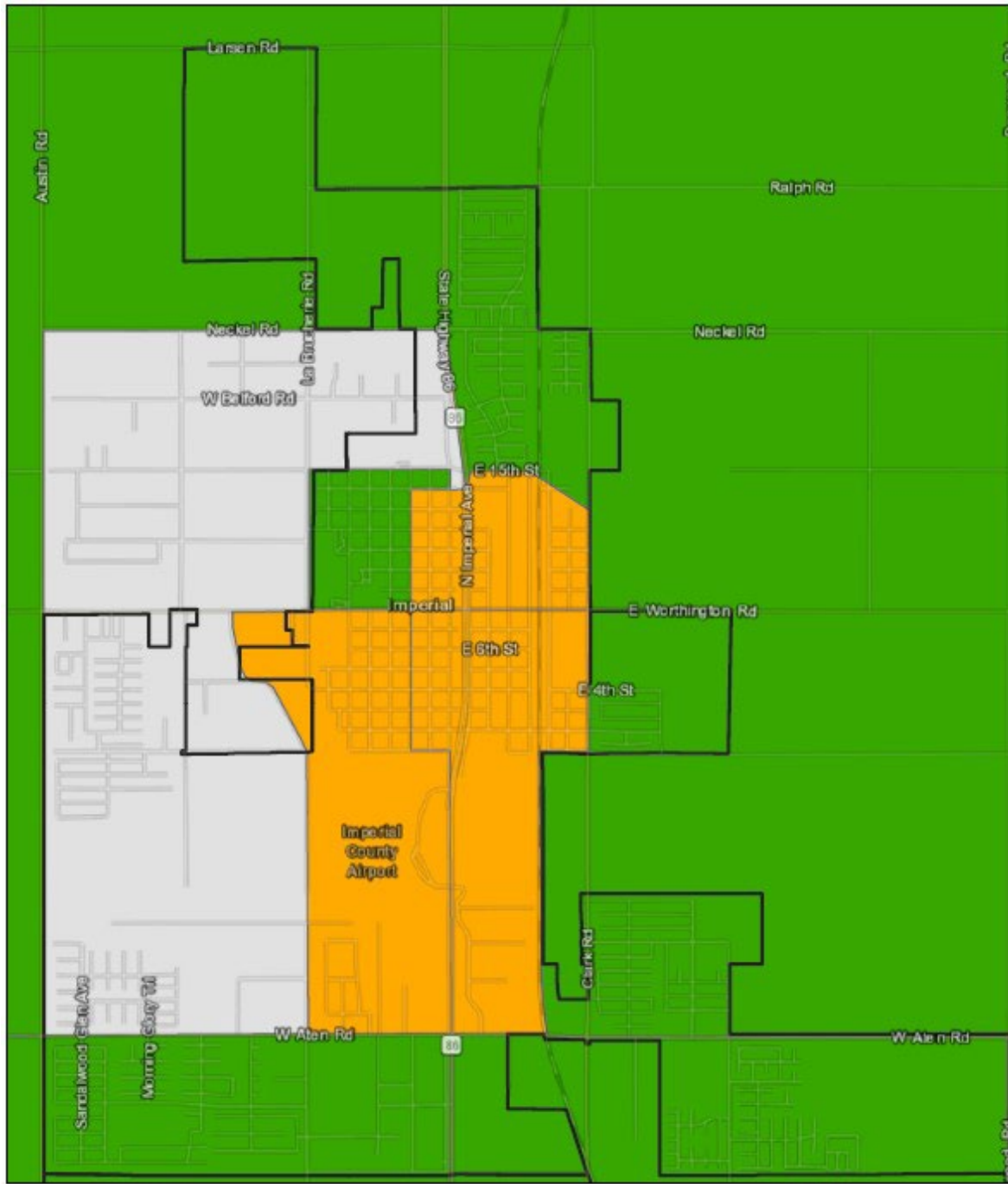
> 80 (Closest Proximity)



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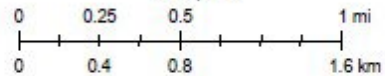
Figure D-27: TCAC Economic Score- City of Imperial



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1:36,112

City/Town Boundaries



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

< 0.25 (Less Positive Economic Outcome)

> 0.75 (More Positive Economic Outcome)

No Data

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Environment

The TCAC Environmental Score is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment.

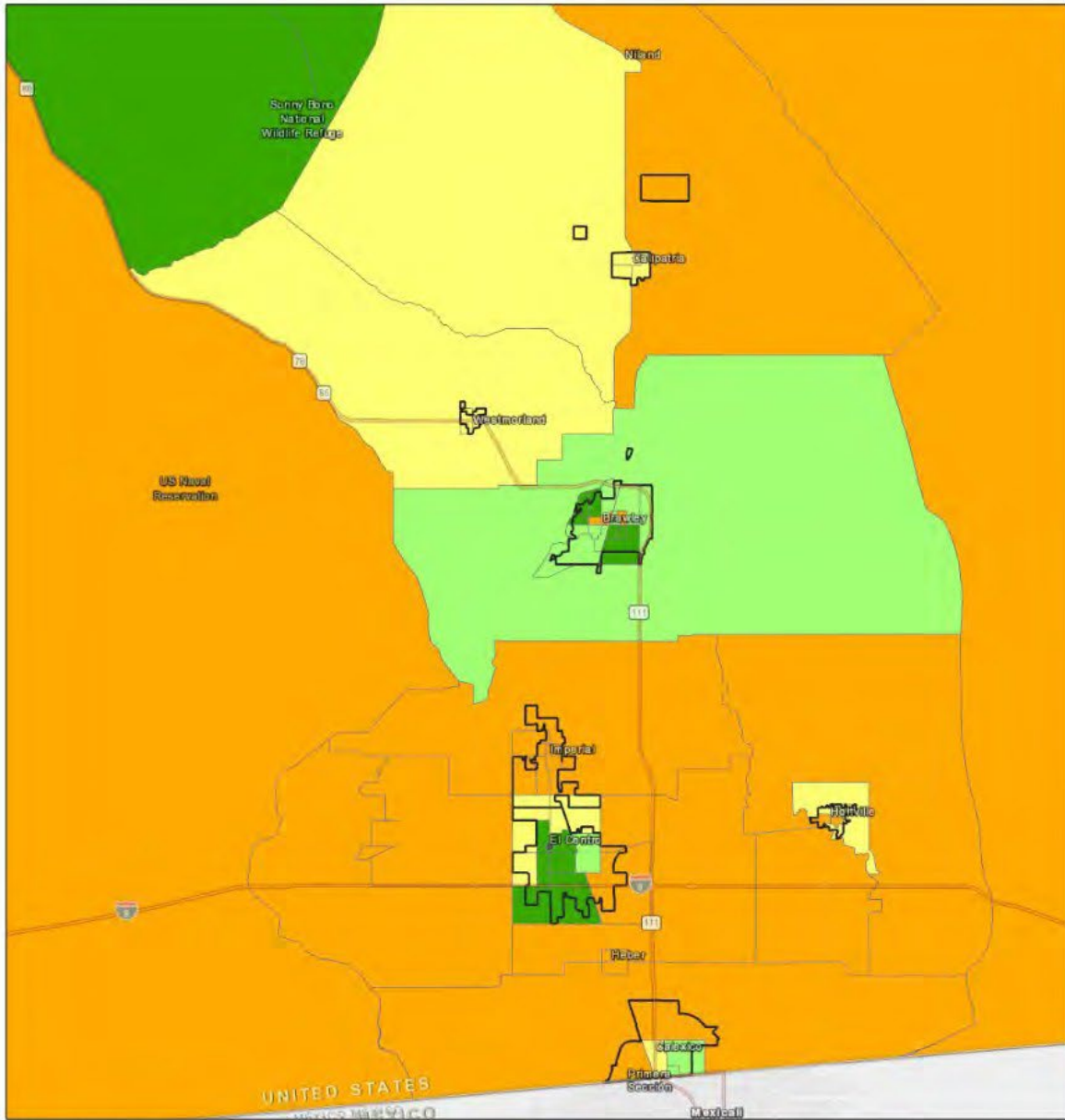
Regional Trends

The TCAC Environmental scores were lowest in areas outside of major jurisdictions, with the least positive environmental outcomes throughout the eastern, western, and southern tracts of the County (Figure D-28). Tracts in the cities of El Centro, Calexico, and Brawley scored highest for positive environmental outcomes.

Local Trends

As shown in Figure D-29, most of the City's census tracts have a less positive environmental outcome with only the tracts adjacent to El Centro scoring slightly better. When compared to the rating of the County, the City of Imperial is similar to much of the rural areas. Possible reasons for the lower environmental outcomes could be related to the closer proximity to farming operations.

Figure D-28: TCAC Environmental Score- Region

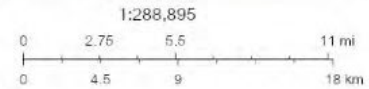


8/5/2021, 6:15:32 PM

City/Town Boundaries

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

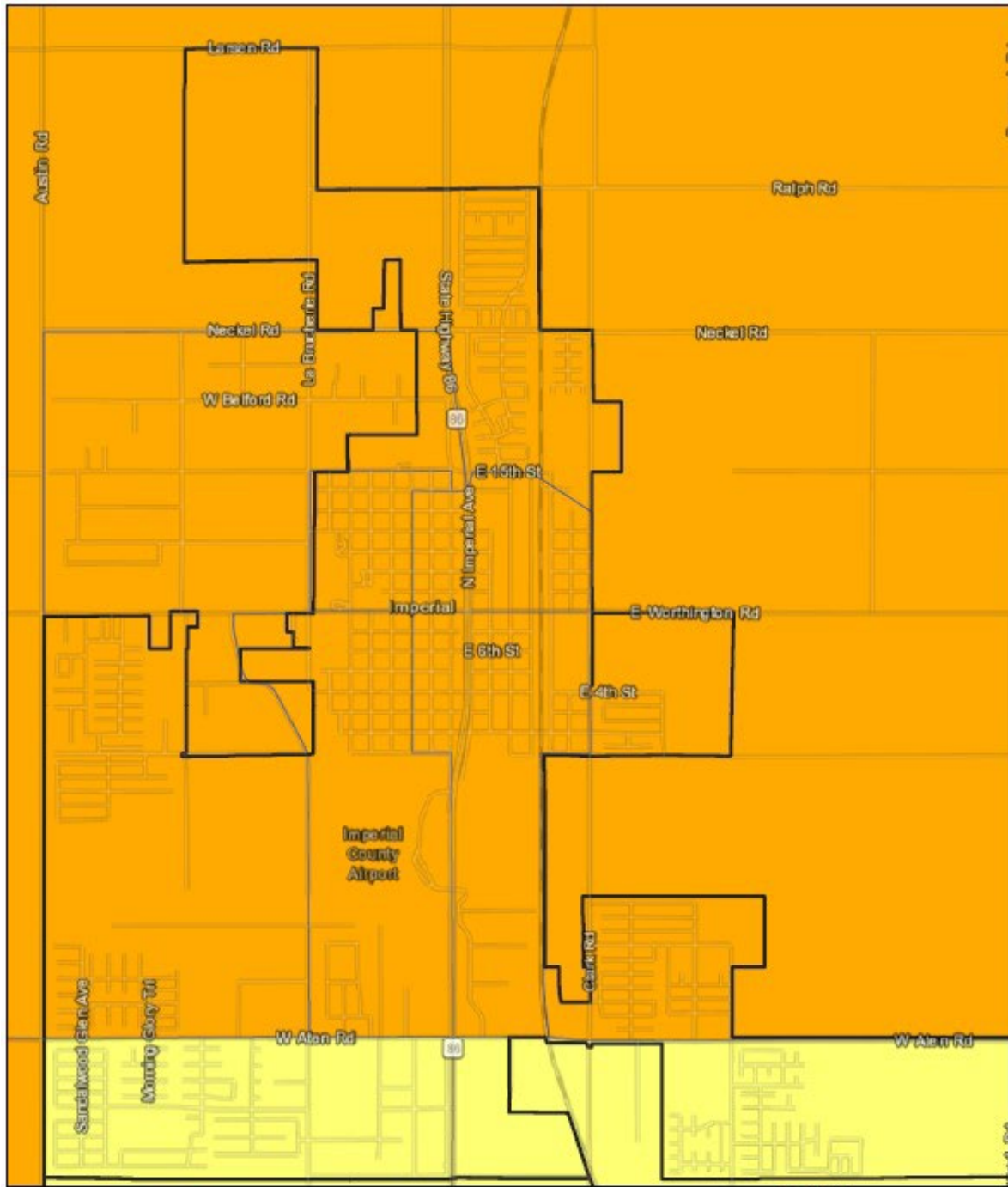
- < .25 (Less Positive Environmental Outcomes)
- .25 - .50
- .50 - .75
- .75 - 1 (More Positive Environmental Outcomes)



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Figure D-29: TCAC Environmental Score- City of Imperial



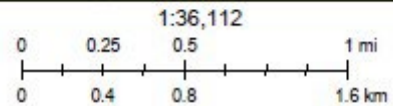
12/7/2021, 5:11:30 PM

City/Town Boundaries

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

< .25 (Less Positive Environmental Outcomes)

.25 - .50



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E. Disproportionate Needs

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Imperial. Housing problems considered by CHAS include:

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

Cost Burden

Regional Trends

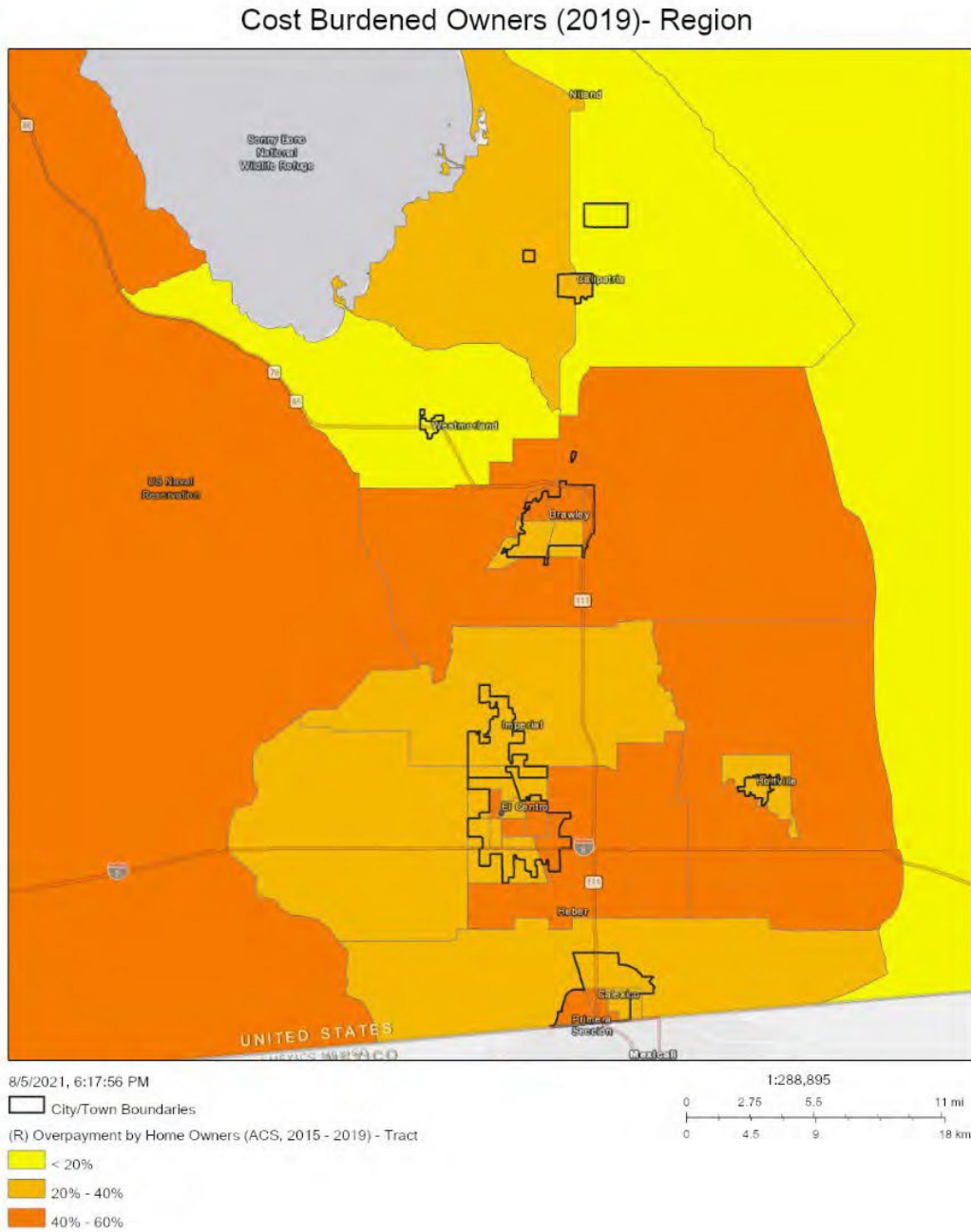
In Imperial County, approximately 36 percent of households were experiencing cost burdens greater than 30% of their income according to the 2013-2017 CHAS data (Table D-7). Renters experience cost burdens at higher rates than owners (48 percent compared to 27 percent. Cost burdened renter households are concentrated census tracts in (Figure D-30 and D-31) Calexico, El Centro, Imperial, and Brawley. Cost-burdened owner households are concentrated in a few census tracts also in the same cities. However, the level concentration of cost burdened households is lower (no census tract has over 80 percent of its owner households experiencing cost burdens).

Table D-7: Housing Problems and Cost Burden - Imperial County

	White	Black	Asian	Am · Ind ·	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	19.1%	33.0%	34.1%	9.4%	100.0%	36.9%	2.6%	32.1%
Renter-Occupied	46.6%	50.3%	17.9%	28.1%	0.0%	59.2%	44.8%	56.8%
All Households	25.7%	43.2%	27.5%	16.6%	71.4%	47.5%	23.0%	42.8%
With Cost Burden								
Owner-Occupied	17.8%	33.3%	34.1%	7.5%	100.0%	29.9%	2.6%	26.8%
Renter-Occupied	44.8%	46.3%	10.4%	18.8%	0.0%	50.0%	44.8%	48.6%
All Households	24.3%	41.0%	24.5%	11.8%	71.4%	39.5%	23.0%	36.3%

Source: HUD CHAS, (2013-2017).

Figure D-30: Cost Burdened Owners (2019) - Region

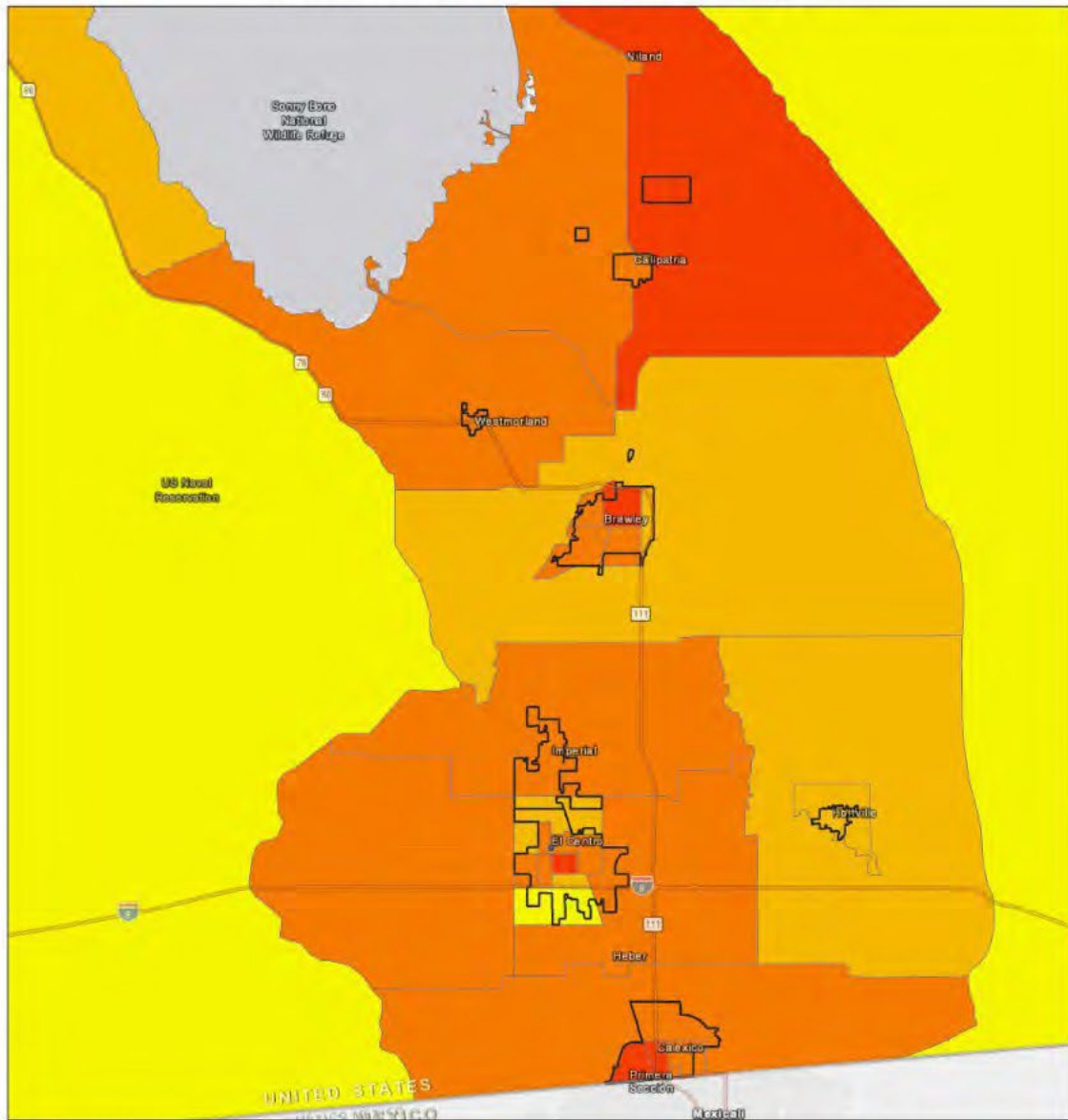


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Figure D-31: Cost Burdened Renters (2019) – Region

Cost Burdened Renters (2019)- Region

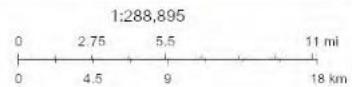


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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%



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Local Trends

Imperial households experience cost burdens at lower rates than the County (24 percent in El Centro, 36 percent in the County). Like the County, renters also experience cost burdens at higher rates than owner households (30 percent and 21 percent, respectively).

Figure D-32 shows the concentration of cost burdened renters in 2019. The majority of cost burdened renter households (40 percent to 60 percent) occur throughout the northern quadrants of the City. Figure D-33 shows the concentration of cost burdened homeowners in 2019. Cost burdened owner households occur at a lower rate (20 percent to 40 percent) and are spread throughout all quadrants of the City.

Distribution of RHNA Units by Cost Burdened Households

According to the data, the City is entirely made up of census tracts with 20 to 40 percent cost burdened owner households. Because of this, all RHNA units are distributed in census tracts with this percentage of cost burdened owner households.

Cost burdened renter households are more prevalent throughout the northern portion of the City's census tracts. Referencing Figure D-1, the majority of RHNA unit are distributed in the census tracts where 40 percent to 60 percent of renters are overpaying. However, all low income RHNA units are located in tracts that are is the tracts that contain 20 percent to 40 percent of renters that are overpaying. The location of the low cost RHNA units in these areas could alleviate the cost burdened of existing residents while at the same time lower income units in areas with lower cost burdens can promote mobility.

Overcrowded Households

Regional Trends

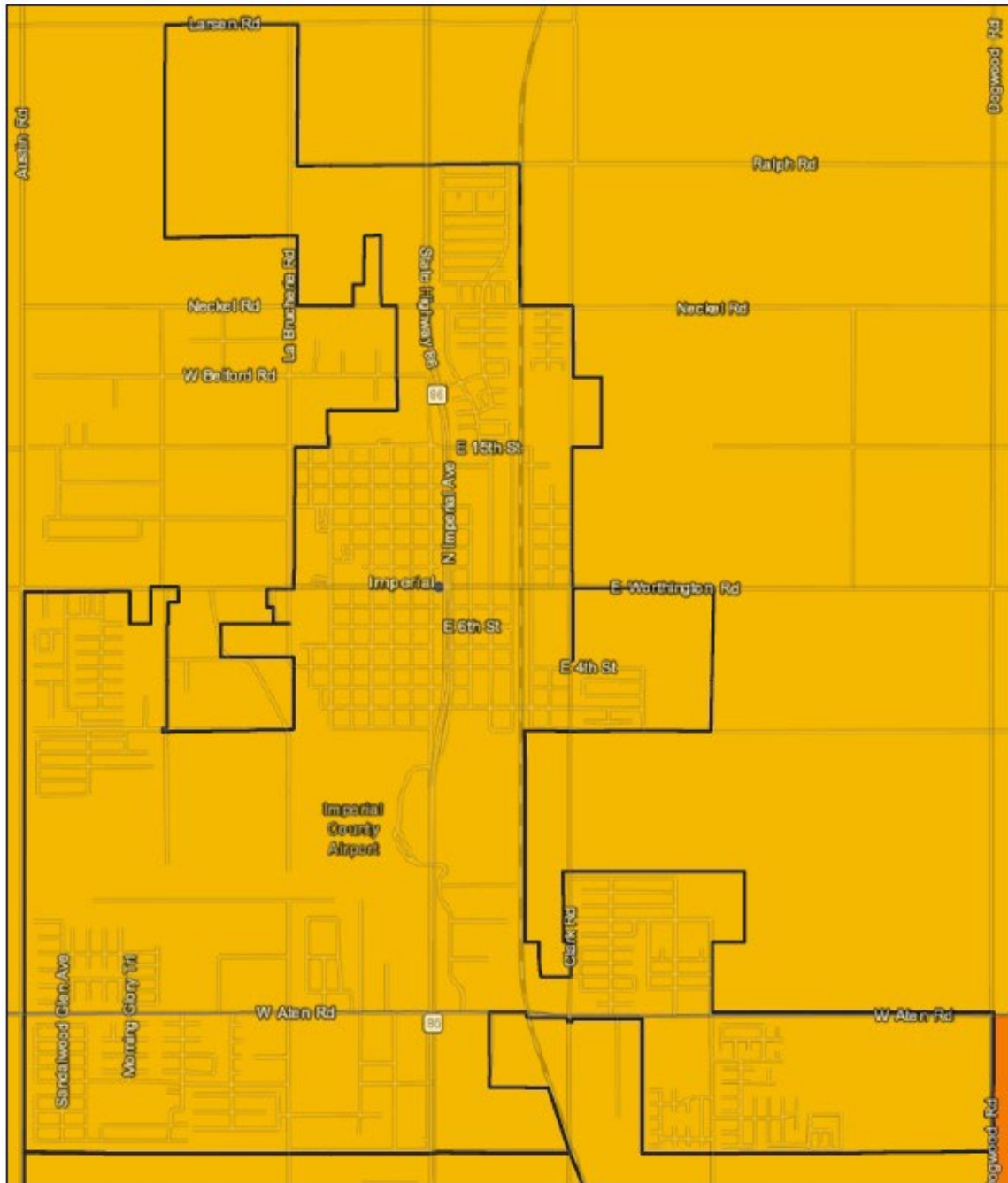
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2019 five-year ACS estimates, about 11 percent of households in the County are living in overcrowded conditions (Table D- 8). Over 16 percent of renter households are living in overcrowded conditions, compared to only seven percent of owner households. As shown in Figure D-34, overcrowded households in the region are concentrated in Calexico, El Centro, and tracts surrounding Brawley and Holtville. The census tract that contains Calipatria also has a concentrated of overcrowded households, where between 12.5 and 15 percent households are experiencing overcrowded conditions.

Table D-8: Overcrowded Households- Imperial County

	Overcrowded (>1.0 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	6.6%	2.5%
Renter Occupied	16.3%	4.4%
All HH	10.7%	3.3%

Source: American Community Survey, 2015-2019.

Figure D-32: Cost Burdened Owners (2019) - City of Imperial



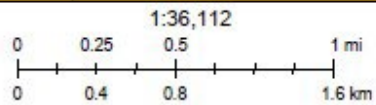
12/17/2021, 3:05:24 PM

City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

20% - 40%

40% - 60%

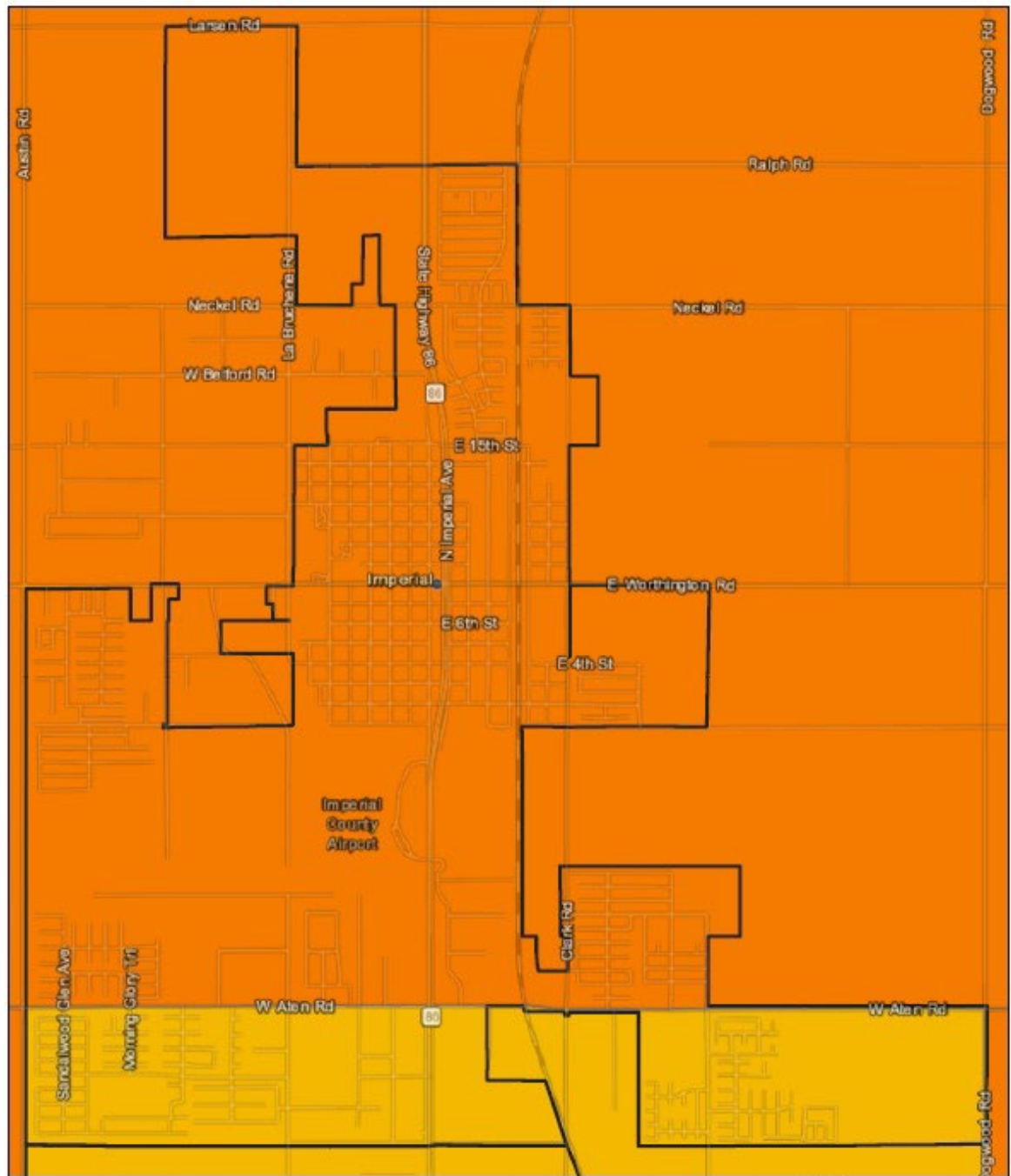


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Figure D-33: Cost Burdened Renters (2019) - City of Imperial



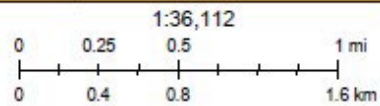
12/17/2021, 3:03:48 PM

City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

20% - 40%

40% - 60%

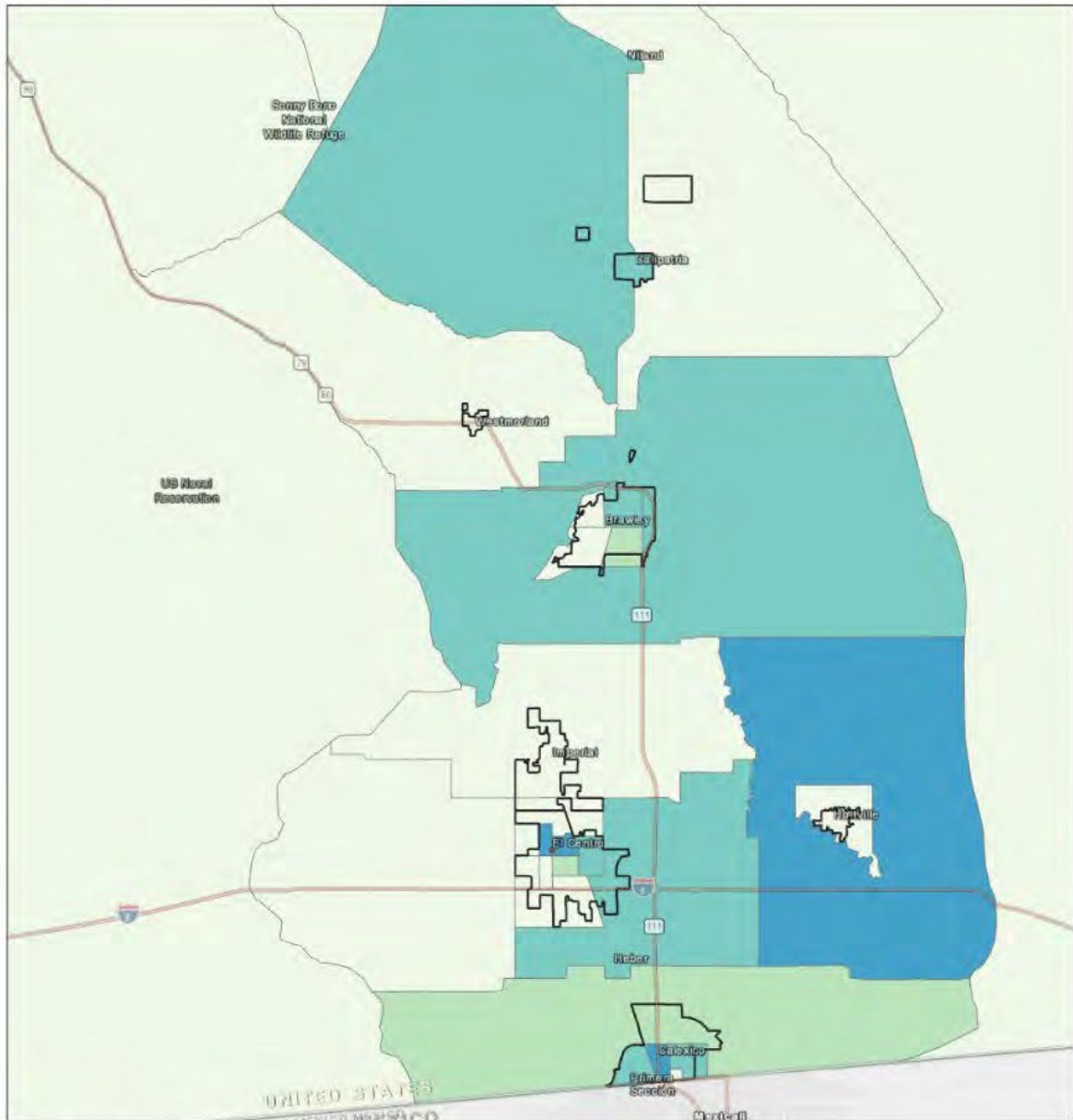


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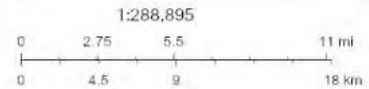
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Figure D-34: Overcrowded Households - Region



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- City/Town Boundaries
- (R) Overcrowded Households (CHHS) - Tract
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%



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Local Trends

Households in the City of Imperial experience overcrowded conditions at lower rates than the County. Four percent of Imperial households are living in overcrowded conditions (compared to 10 percent of County households). Unlike County households, renters in Imperial are less likely to experience overcrowded conditions than owners (three percent versus five percent, respectively). Within the City, all the census tracts are experiencing less than the state average (8.2 percent) of overcrowding.

Table D-9: Overcrowded Households- City of Imperial

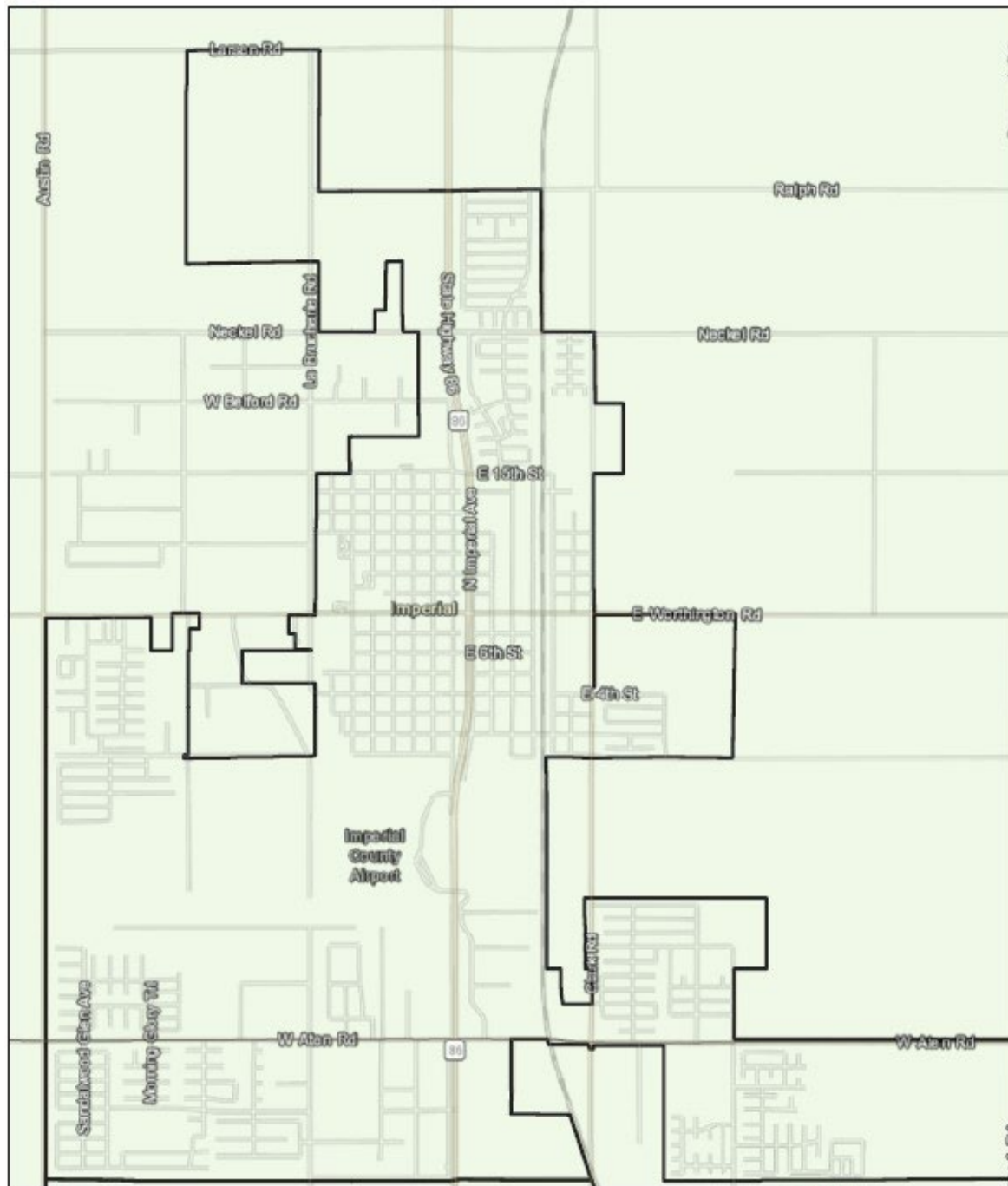
	Overcrowded (>1 persons per room)	Severely Overcrowded (>1.5 persons per room)
Owner-Occupied	4.6%	3.3%
Renter Occupied	2.9%	2.6%
All HH	4.2%	3.1%

Source: American Community Survey, 2015-2019.

Distribution of RHNA Units by Overcrowded Households

According to the data presented in Figure D-35, the City is entirely made up of census tracts with less than 8.2 percent overcrowded households. Because of this, all RHNA units are distributed in census tracts with this percentage of overcrowded households.

Figure D-35: Overcrowded Households- City of Imperial





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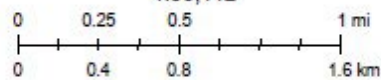
1:36,112

 City/Town Boundaries

(R) Overcrowded Households (CHHS) - Tract

 ≤ 8.2% (Statewide Average)

 12.01% - 15%



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Substandard Conditions

Regional Trends

Housing that is 30 years or older is assumed to require some rehabilitation. Such features as electrical capacity, kitchen features, and roofs, usually need updating if no prior replacement work has occurred. According to the 2015-2019 AC estimates, nearly 50 percent of Imperial County’s housing stock was built before 1990 (is over 30 years old) and only 28 percent of housing was built in the last 20 years. The cities of Westmoreland, El Centro, and Holtville have the oldest housing stock in the county, with over 65 percent of their housing stock aged 30 or older.

Local Trends

Median year of structures built in Imperial are shown in the census tracts depicted in Figure D- 36. Older housing is found in the northern central tracts of City and the age of the housing gets younger in a counterclockwise pattern around the central portion of the City with newer housing occurring **along the outer edges**.

Figure D-36: Median Year Structure Built – City of Imperial

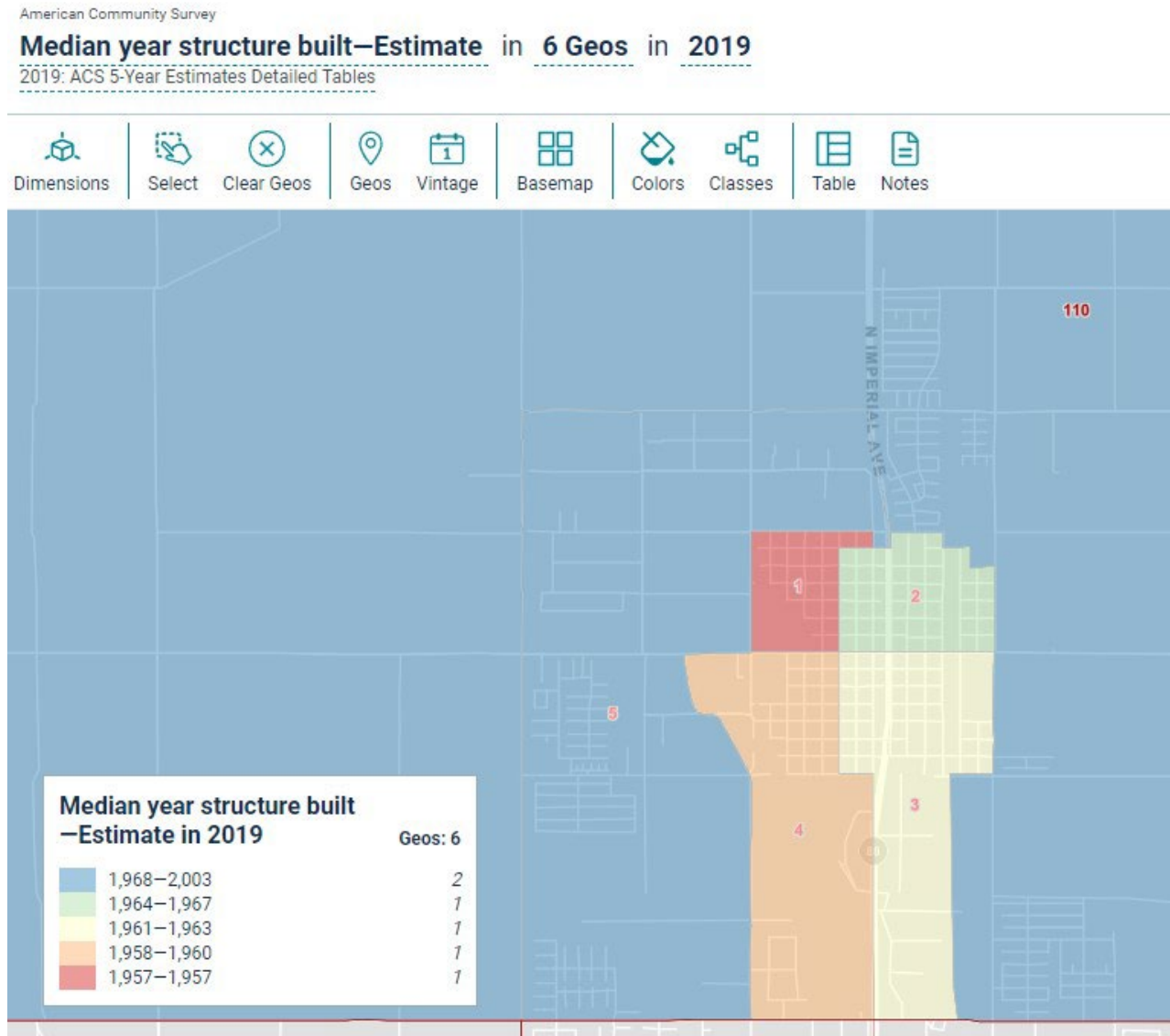
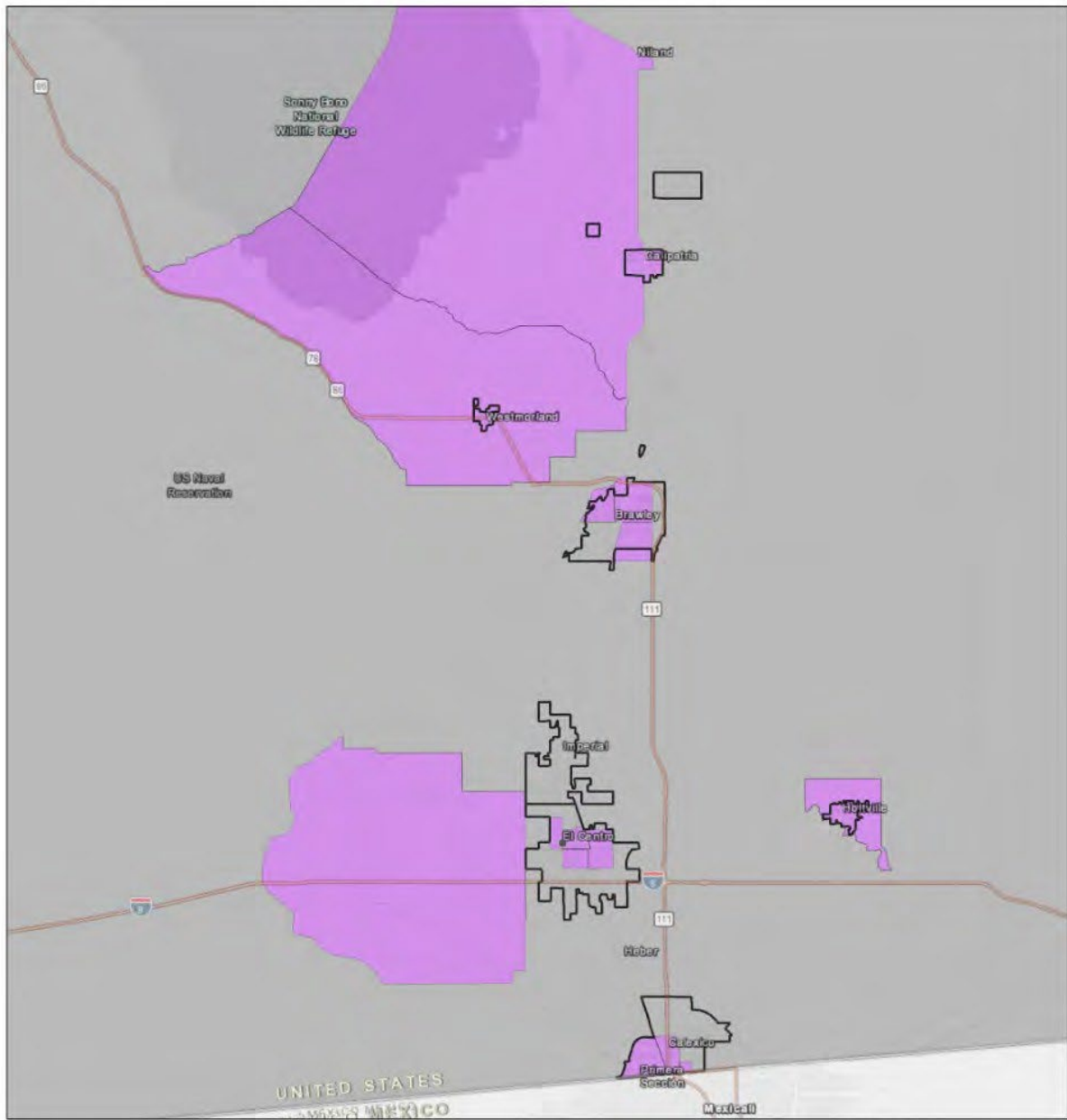


Figure D-37: Sensitive Communities- Region



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City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

Other

1:288,895

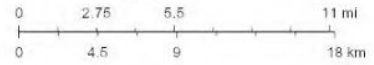
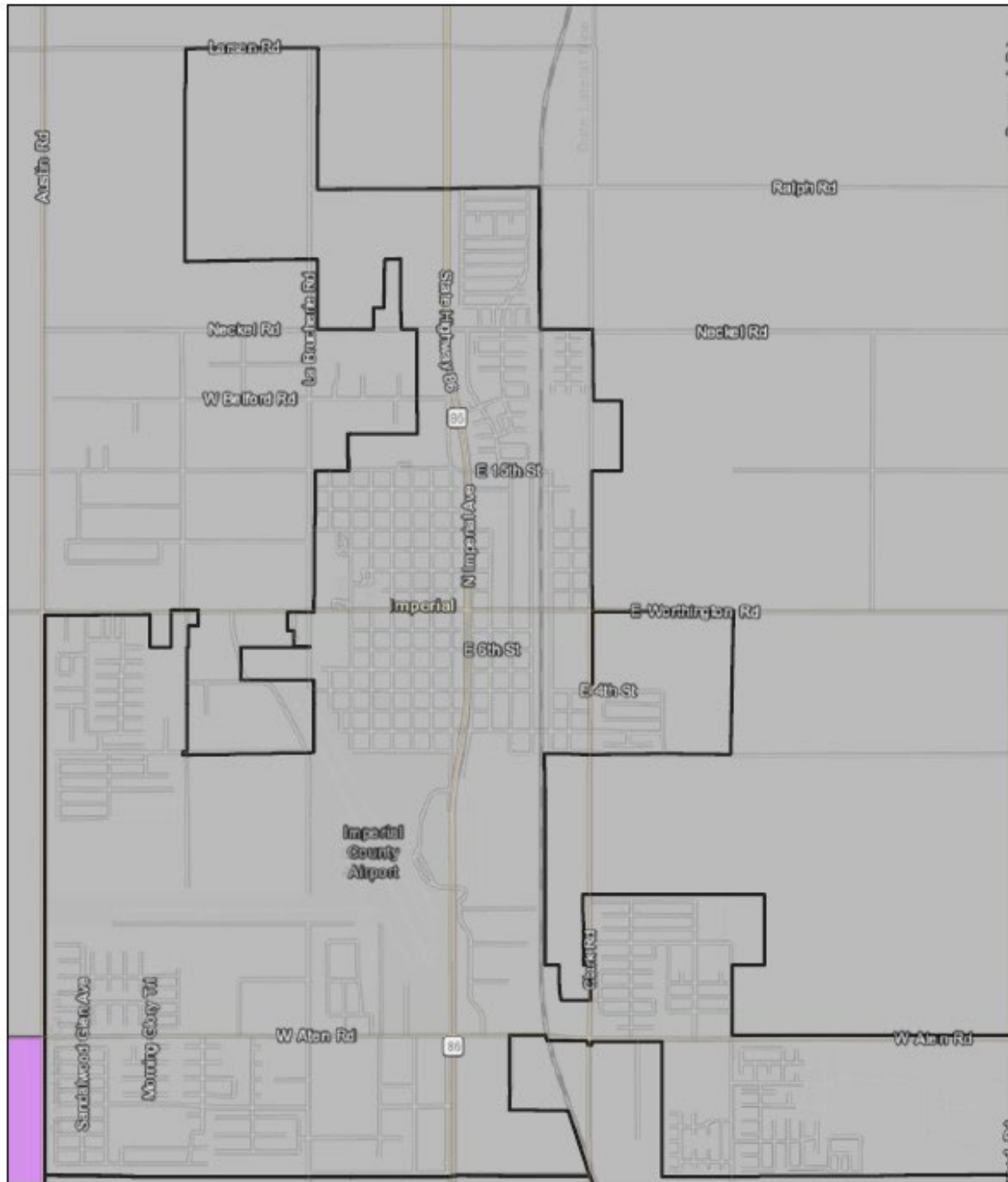


Figure D-38: Sensitive Communities- City of Imperial



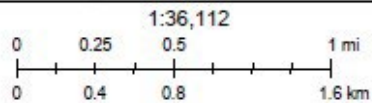
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City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

Other



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Displacement Risk

Regional Trends

UC Berkley’s Urban Displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the research has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities were identified in census tracts in the major cities of the County including Calipatria, Westmorland, Brawley, El Centro, Holtville, and Calexico (Figure D-37).

Local Trends

As shown in Figure D-38, no sensitive communities have been identified in the City of Imperial.

F. Other Relevant Factors

Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. Table D-10 below identified the lending patterns by race and ethnicity, as well as income category for the El Centro Metropolitan Statistical Area. Specific data for the city of Imperial was unavailable to determine local trends.

Table D-10: Disposition of Loan Applications by Race/Ethnicity – El Centro MSA/MD

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
LESS THAN 50% OF MSA/MD MEDIAN				
American Indian and Alaska Native	0.0%	75.0%	25.0%	4
Asian	50.0%	35.7%	14.3%	14
Black or African American	57.1%	28.6%	14.3%	7
Native Hawaiian or other Pacific Islander	66.7%	33.3%	0.0%	3
White	44.1%	24.3%	31.6%	304

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
Hispanic or Latino	40.6%	30.1%	29.4%	286
50-79% OF MSA/MD MEDIAN				
American Indian and Alaska Native	50.0%	33.3%	16.7%	6
Asian	20.0%	20.0%	60.0%	5
Black or African American	22.2%	33.3%	44.4%	9
Native Hawaiian or other Pacific Islander	20.0%	80.0%	0.0%	5
White	62.5%	18.0%	19.5%	627
Hispanic or Latino	60.2%	18.9%	20.9%	635
80-99% OF MSA/MD MEDIAN				
American Indian and Alaska Native	75.0%	0.0%	25.0%	4
Asian	0.0%	50.0%	50.0%	2
Black or African American	100.0%	0.0%	0.0%	3
Native Hawaiian or other Pacific Islander	0.0%	0.0%	0.0%	0
White	64.4%	15.9%	19.7%	239
Hispanic or Latino	65.2%	14.3%	20.5%	244
100-119% OF MSA/MD MEDIAN				
American Indian and Alaska Native	14.3%	42.9%	42.9%	7
Asian	33.3%	46.7%	20.0%	15
Black or African American	62.5%	25.0%	12.5%	8
Native Hawaiian or other Pacific Islander	100.0%	0.0%	0.0%	2
White	67.0%	12.5%	20.5%	761

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
Hispanic or Latino	66.3%	12.8%	21.0%	720
120% OR MORE OF MSA/MD MEDIAN				
American Indian and Alaska Native	37.5%	31.3%	31.3%	16
Asian	57.1%	22.9%	20.0%	35
Black or African American	65.2%	26.1%	8.7%	23
Native Hawaiian or other Pacific Islander	38.5%	30.8%	30.8%	13
White	67.4%	10.8%	21.8%	1,796
Hispanic or Latino	65.3%	13.4%	21.4%	1,544
<i>Source: Consumer Financial Protection Bureau. (2019) Disposition of loan applications, by Ethnicity/Race of applicant. Available at https://www.consumerfinance.gov/compliance/compliance-resources/mortgage-resources/hmda-reporting-requirements/home-mortgage-disclosure-act-faqs/.</i>				

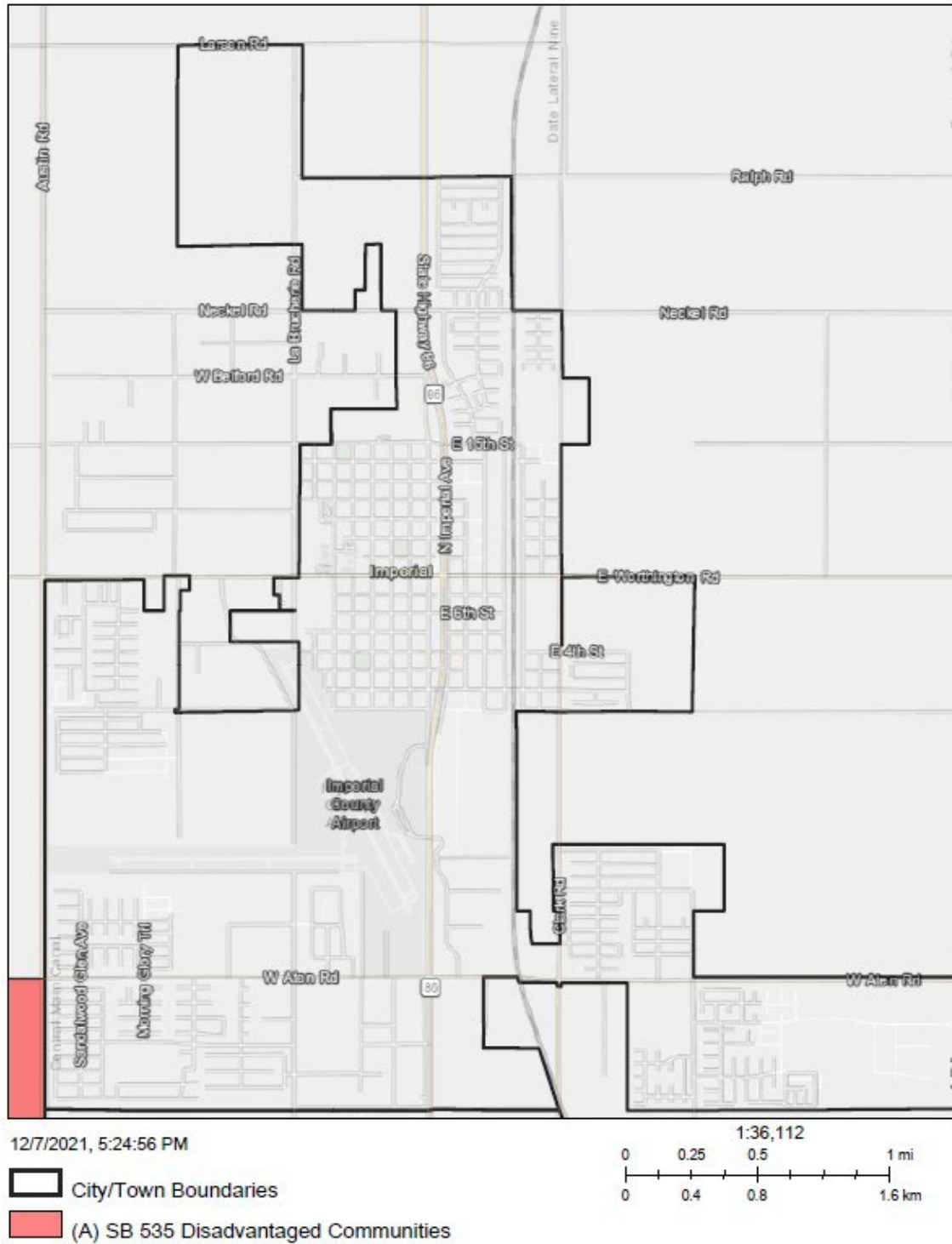
According to the data, applicants in the highest income category were more likely to have a loan approved, compared to applicants in the lowest income category where approval rates were consistently under 50 percent. Additionally, within each income category, applicants who identified as White consistently had higher rates of approval than applicants of color of who identified as Hispanic or Latino. Overall, applicants who identified as Black or African American, Native Hawaiian or other Pacific Islander, and American Indian or Alaska Native had the lowest rates of loan approval in many income categories.

Environmental Justice Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time they’re reducing pollution that causes climate change.

Any jurisdiction can choose to include policies focused on environmental justice (EJ) in their General Plan, but an EJ Element is required under state law for any city or county that includes disadvantaged communities. For the purposes of environmental justice, a disadvantaged community is defined as, “An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.” Senate Bill 535 defines disadvantaged communities as the top 25% scoring areas from CalEnviroScreen. Assembly Bill 1550 defines low-income communities using census data, statewide median income data, and state Department of Housing and Community Development income limits. As shown below (Figure D-39), There are no disadvantaged communities identified in the City of Imperial.

Figure D-39: Disadvantaged Communities- City of Imperial



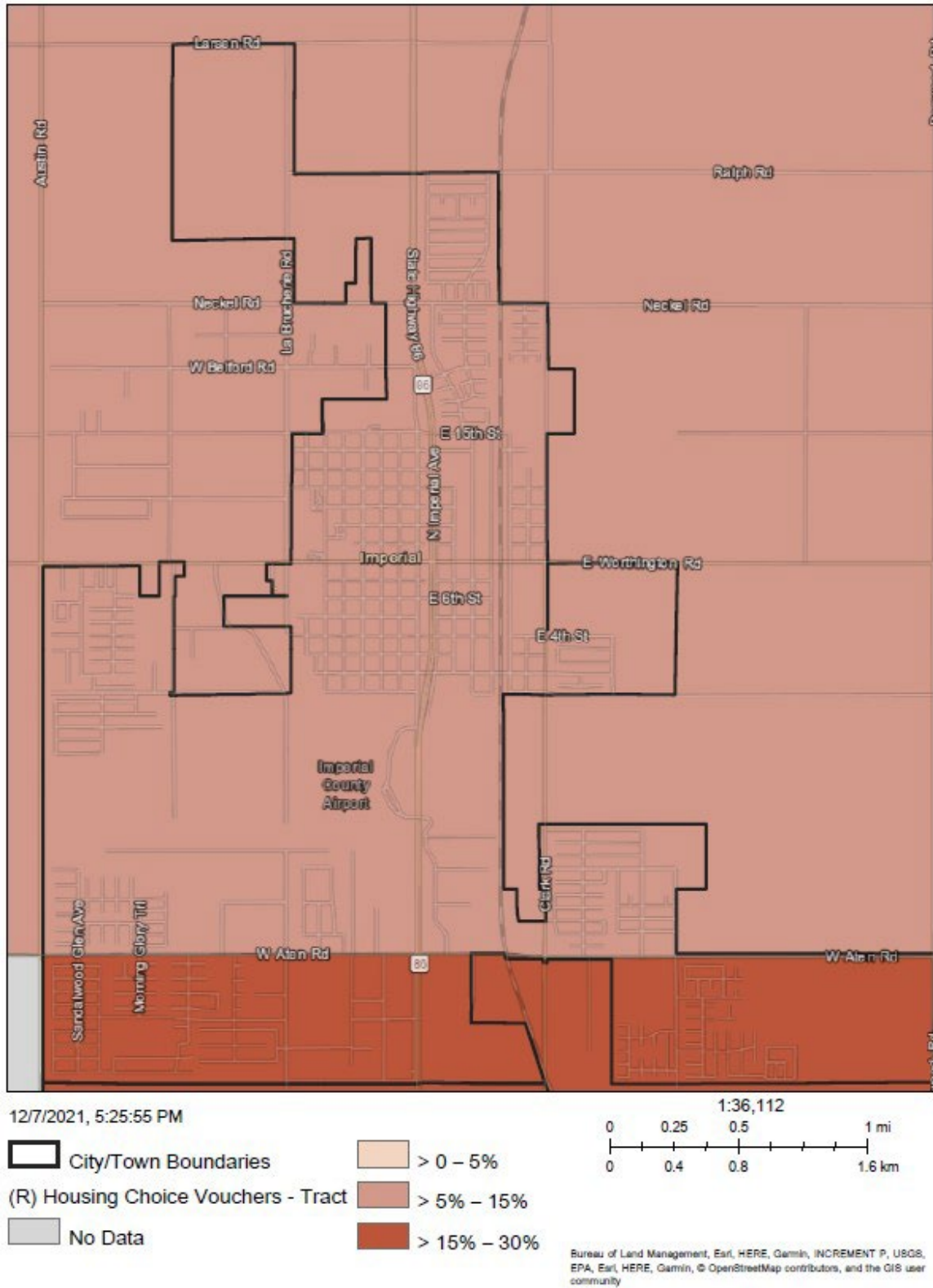
Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

Housing Choice Vouchers

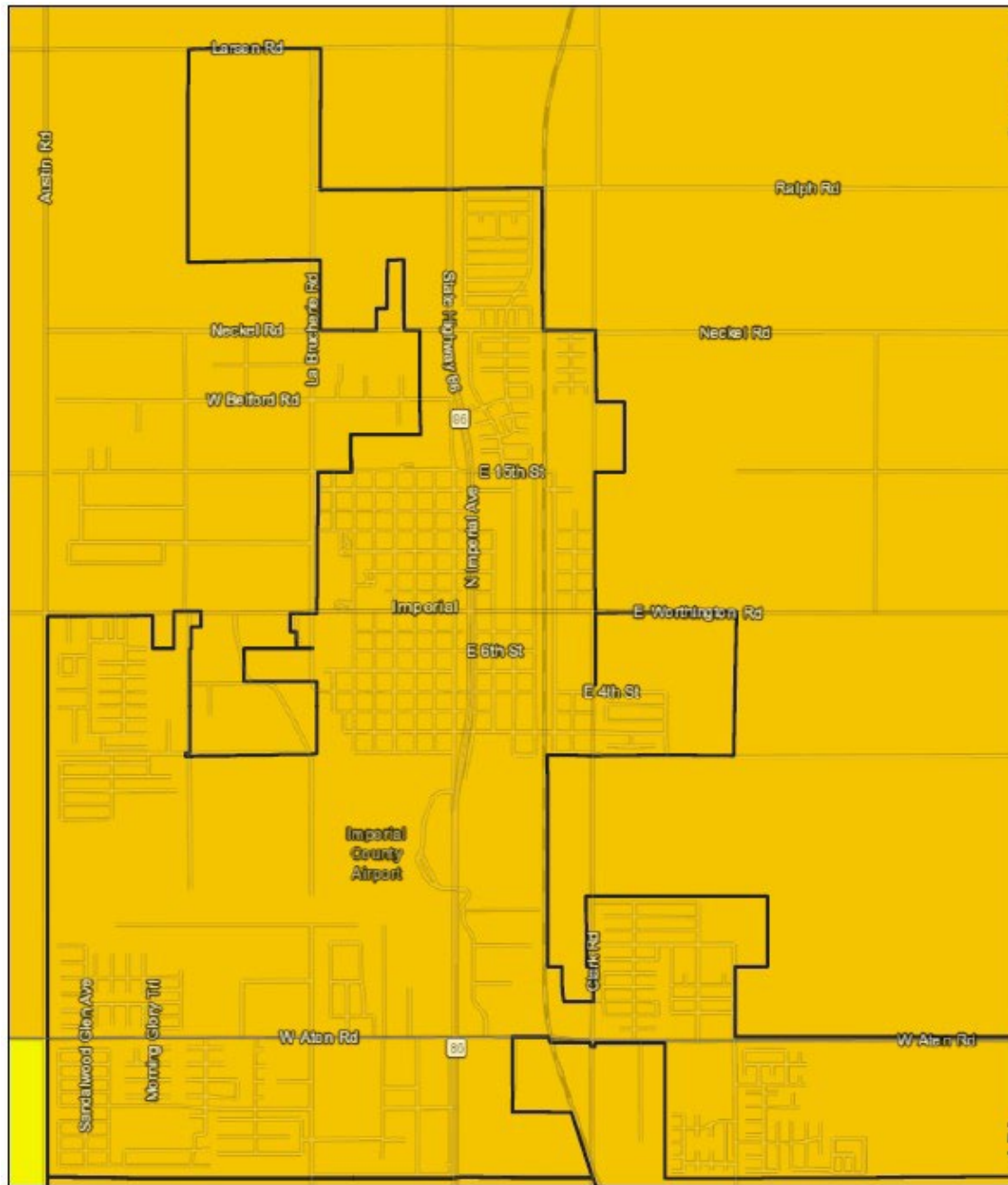
Trends related to housing choice vouchers (HCV) can show patterns of concentration and integration. As of December 2020, 933 Imperial households received Section 8 assistance from the Imperial Valley Housing Authority. The map in Figure D-40 shows that HCV use is dispersed throughout the majority of the City but is concentrated in the southern quadrants of the City. In these tracts, between 15 and 30 percent of the renter households are HCV users. This may be because these areas have a higher concentration of multi-family developments or that these tracts contain a higher concentration of the population with a disability (Figure D-7). According to the data for the HUD Affordability Index presented in Figure D-41, the entire City shares the same level of affordability category.

Figure D-40: HCV Concentration- City of Imperial



Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, EBRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | CA HCD

Figure D-41: Median Gross Rent/ Affordability Index - City of Imperial



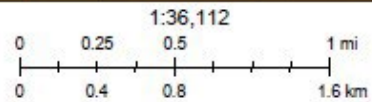
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City/Town Boundaries

(R) Location Affordability Index (HUD) - Tract

<\$1,000

<\$1,500



Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 |

D.3 Site Inventory

AB 686 requires a jurisdiction's site inventory "...shall be used to identify sites throughout the community, consistent with..." its duty to affirmatively further fair housing. The number of units, location and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to all components of the assessment of fair housing was integrated throughout the discussion in the fair housing assessment section.

As demonstrated in Figure D-1, RHNA sites are geographically concentrated in six specific areas that are dispersed throughout the City. Given the City's unique housing market and related housing costs, areas of "mixed income" units are located in the northern, central-eastern, and southeastern areas of the City. Areas of moderate income units are located in the central eastern portion of the City and above moderate units are located in the central western portion of the City. Lower income units are located along the southern and southeastern portion of the City.

Improved Conditions: Through the placement of lower income units to the south of the City, an improved condition could exist related to the higher concentration of people with disabilities and renters that are cost burdened as well as assist in improving educational outcomes.

Exacerbated Conditions: Given that all the RHNA units were accounted for on vacant properties, the age of existing housing will continue to age further without being replaced by RHNA units. Since no RHNA units are considered in the central area of the City, the lower economic outcome of the central tracts has the potential to continue. Additionally, lower income units are located in the southern area of the City which is in line with higher concentrations of HCV use, thereby continuing or increasing the use of HCVs in this portion of the City.

Isolation of the RHNA: Due to the large amount of undeveloped land in the City of Imperial, vacant lots were the primary consideration for the location of RHNA units. As these are the most likely to be developed, they would be the most suitable for the RHNA units. Although there are six areas where the RHNA units are located, they are dispersed throughout the City. Due to existing zoning, the above moderate units were concentrated in the central western portion of the City. Lots that will contain solely lower income units are located in the southern and southeastern areas of the City and lots that will contain solely moderate units are located in the eastern central portion of the City. However, Imperial is providing a substantial number of units on lots that contain a mixture of moderate and above moderate units in the north, central and southeastern areas of the City. Therefore, although there are some areas of concentrated income units, the City of Imperial is attempting to incorporate all types of RHNA units throughout the City to avoid patterns of isolation.

It is the City's intent to promote mixed-income communities with the goal to improve the conditions of these areas with concentrated disparities. By placing lower income units in areas that have a lower concentration of low to moderate income population there could be a potential for increased opportunities for this segment. Mixed-income RHNA units throughout the City can potentially diversify the socioeconomic profile in the area.

Generally, RHNA site distribution followed the patterns of distribution of the components/characteristics of the assessment of fair housing. Additionally, the development of the proposed RHNA units are not anticipated to further entrench fair housing issues in a way that would create disparities in the future.

D.4 Summary of Fair Housing Issues and Contributing Factors

Through the assessment discussed in this appendix, consultation with surrounding jurisdiction fair housing assessments, and discussions with local stakeholders, the City identified factors that contribute to fair housing factors in Imperial. Table D-11 identifies some fair housing issues and suggests meaningful actions to further fair housing in the City. Unless otherwise indicated, the meaningful actions listed in Table D-11 have been included in Program 20 of the Housing Element Housing Plan.

No policies or programs in the Housing Element have been identified as barriers to fair housing practices in the City of Imperial. In addition to Federal fair housing laws, existing City policies and programs are already in place to increase affordable housing options, as well as ensure the provision of housing to many different population groups, including persons living with disability, large families, farmworkers, and persons who would benefit from supportive and/or transitional housing. The implementation of identified programs would further existing fair housing practices by expanding outreach strategies to include populations that live on lower household incomes and/or those who would be more receptive through Spanish language communication.

Table D-11: Fair Housing Issues, Contributing Factors, and Meaningful Actions

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
High	Staffing issues have been identified as a major contribution to the lack of City-specific enforcement and outreach programs and practices. (AFH Issue Area: Enforcement & Outreach)	<p>PROGRAM 2: The City will obtain funding to acquire additional staff specifically dedicated overseeing the implementation of policies and programs established in the housing element as well as unmet goals from previous housing element cycles.</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 2: The City will create a Development Outreach Committee, or similar City-run group, to actively promote sites available for lower- and moderate- income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.</p> <p>TIMELINE: Once for the creation of a City-run group by year-end 2023, and then ongoing and no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 3: The City will seek additional funding sources and identify new partnerships to greater expand resources.</p> <p>TIMELINE: Ongoing and at least every 6 months.</p> <hr/> <p>PROGRAM 20: Allocate annual funding for fair housing services through the City’s process for the use of CDBG funds.</p> <p>TIMELINE: No less than annually.</p> <hr/> <p>PROGRAM 20: Hire additional staff and pursue contracting with the Inland Fair Housing and Mediation Board (IFHMB) to develop and oversee the implementation of fair housing programs.</p> <p>TIMELINE: Once, completed by October 2023.</p>
High	<p>Reliance on regional fair housing data or data of surrounding communities rather than maintaining City of Imperial specific data limits the ability of the City to address its unique housing needs.</p> <p>(AFH Issue Area: Enforcement & Outreach)</p>	<p>PROGRAM 1: Maintain an ongoing inventory of multi-family residential and mixed-use sites and provide updated information on sites on City website.</p> <p>TIMELINE: Established by October 2023 and maintained no less than annually.</p> <hr/> <p>PROGRAM 1: Maintain an ongoing inventory of City-owned properties and other surplus sites owned by other public agencies that may be appropriate for residential uses.</p> <p>TIMELINE: Established by October 2023 and maintained no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 1: Perform a Housing Conditions Survey of the City’s existing housing stock by October 2023 to identify the need to rehabilitate or redevelop aging homes with the focus to identify opportunities to increase density to better meet the City’s RHNA.</p> <p>TIMELINE: Performed by October 2023 and updated at least every other year.</p> <hr/> <p>PROGRAM 1: Research Census data related to Vacancy Rates to clarify discrepancies in local data versus regional data to determine whether actions would be required to resolve a vacancy issue.</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 1: Investigate tracking rents for accessory dwelling units.</p> <p>TIMELINE: Once, completed by October 2023, and then updated every 6 months as appropriate.</p> <hr/> <p>PROGRAM 2: The City will annually monitor the City’s remaining housing capacity to ensure compliance with SB 166.</p> <p>TIMELINE: No less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Participate in regional efforts to mitigate impediments to fair housing choice, including participation in the preparation of a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Conduct fair housing testing at random sites to measure compliance and remove any such impediments through fair housing law enforcement.</p> <p>TIMELINE: No less than annually.</p>
High	<p>People obtain information through many media forms, not limited to traditional newspaper noticing or other print forms. Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large. This has led to limited public participation in City business.</p> <p>(AFH Issue Area: Enforcement & Outreach)</p>	<p>PROGRAM 18: Share and distribute public announcements/information through a variety of mediums such as flyers, E-blasts, website updates, new media, and social media.</p> <p>TIMELINE: Ongoing and with each discretionary housing project.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 18: Beginning in 2022, increase accessibility to public meetings by conducting public meetings at suitable times, having meetings be accessible to persons with disabilities, having meetings be accessible to nearby transit centers, and provide additional resources such as childcare, translation, and food services.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 18: Ensure public engagement opportunities are conducted in a variety of languages including Spanish to help reduce language barriers to the Hispanic community in Imperial.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Distribute educational materials to property owners, apartment managers, and tenants relative to fair housing requirements, regulations, and services.</p> <p>TIMELINE: Ongoing and no less than annually.</p> <hr/> <p>PROGRAM 20: Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities.</p> <p>TIMELINE: Ongoing and no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Conduct workshops and training with different community-based organizations.</p> <p>TIMELINE: No less than every 2 years, as funding is available.</p> <hr/> <p>PROGRAM 20: Conduct fair housing workshops and training in Spanish.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Medium	<p>Lack of readily available fair housing services specific to the City of Imperial is an impediment to getting support for the local population.</p> <p>(AFH Issue Area: Enforcement & Outreach)</p>	<p>PROGRAM 2: The City will obtain funding to acquire additional staff specifically dedicated overseeing the implementation of policies and programs established in this housing element as well as unmet goals from previous housing element cycles.</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 2: The City will create a Development Outreach Committee, or similar City-run group, to actively promote sites available for lower- and moderate- income housing development to potential developers, private and non-profit organizations, and other interested persons and organizations.</p> <p>TIMELINE: Once for the creation of a City-run group by year-end 2023, and then ongoing and no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 14: Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 15: The City will create and adopt a Reasonable Accommodation Ordinance, by October 2023, to establish a written procedure demonstrating how the City complies with State Law. The ordinance shall include a process for how the City will review and decide applications for reasonable accommodation as provided by the federal Fair Housing Amendments Act and California’s Fair Employment and Housing Act to allow reasonable remedy from zoning standards for individuals with physical or mental impairment (i.e. Administrative Committee).</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 18: Continue to educate all community groups of the services available when it comes to both rental, homeownership, and rehabilitation/maintenance services.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Allocate annual funding for fair housing services through the City’s process for the use of CDBG funds.</p> <p>TIMELINE: No less than annually</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Participate in regional efforts to mitigate impediments to fair housing choice, including participation in the preparation of a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Distribute educational materials to property owners, apartment managers, and tenants relative to fair housing requirements, regulations, and services.</p> <p>TIMELINE: Ongoing and no less than annually.</p> <hr/> <p>PROGRAM 20: Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities.</p> <p>TIMELINE: Ongoing and no less than annually.</p> <hr/> <p>PROGRAM 20: Conduct fair housing testing at random sites to measure compliance and remove any such impediments through fair housing law enforcement.</p> <p>TIMELINE: No less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
High	<p>Those identifying as Hispanic/Latino make up 78 percent of the City of Imperial’s population, and over 81 percent of the City’s total population is in a racial/ethnic minority. Language and cultural barriers persist as a contributing factor to reduced public participation.</p> <p>(AFH Issue Area: Integration & Segregation – Race/Ethnicity)</p>	<p>PROGRAM 18: Actively monitor existing stakeholders and seek to find additional stakeholders from all sectors of the community to engage in the public participation process.</p> <p>TIMELINE: No less than quarterly.</p>
		<p>PROGRAM 18: Ensure public engagement opportunities are conducted in a variety of languages including Spanish to help reduce language barriers to the Hispanic community in Imperial.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
		<p>PROGRAM 18: Continue to educate all community groups of the services available when it comes to rental, homeownership, and rehabilitation/maintenance services.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
		<p>PROGRAM 20: Conduct workshops and training with different community-based organizations.</p> <p>TIMELINE: No less than every 2 years, as funding is available.</p>
		<p>PROGRAM 20: Conduct fair housing workshops and training in Spanish.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Hold diversity awareness events and programs at a variety of locations throughout the City.</p> <p>TIMELINE: No less than every 2 years, as funding is available.</p> <p>PROGRAM 20: Monitor and respond to complaints of discrimination (i.e. intaking, investigation of complaints, and resolution).</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Medium	<p>The City of Imperial has a lower population of persons with a disability in comparison to the surrounding area. However, persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.</p> <p>(AFH Issue Area: Integration & Segregation – Persons with Disabilities)</p>	<p>PROGRAM 3: The City shall assist and support developers of housing for lower income households, especially housing for extremely-low-income households and the disabled (including the developmentally disabled), with site identification, supporting applications, conducting pre-application meetings, assisting with design and site requirements, and providing regulatory incentives and concessions.</p> <p>TIMELINE: Ongoing and at least every 6 months.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 13: To assist the most disadvantaged groups including the extremely-low and very-low income and individuals with developmental disabilities, the City will continue to target and reserve resources for these groups through City administered programs such as CDBG Housing Rehabilitation Program and CDBG First lime Homebuyer Program as well as seek partners for the development of new housing for the extremely low and low income including but not limited to Joe Serna Farmworker Program and HOME.</p> <p>TIMELINE: Ongoing and no less than every 6 months.</p> <p>PROGRAM 13: Facilitate the development of housing for persons with disabilities and other special needs through incentives for affordable housing development.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <p>PROGRAM 14: Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 15: The City will create and adopt a Reasonable Accommodation Ordinance, by October 2023, to establish a written procedure demonstrating how the City complies with State Law. The ordinance shall include a process for how the City will review and decide applications for reasonable accommodation as provided by the federal Fair Housing Amendments Act and California’s Fair Employment and Housing Act to allow reasonable remedy from zoning standards for individuals with physical or mental impairment (i.e. Administrative Committee).</p> <p>TIMELINE: Once, completed by October 2023.</p> <p>PROGRAM 18: Continue to educate all community groups of the services available when it comes to both rental, homeownership, and rehabilitation/maintenance services.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Medium	<p>The lack of access to public transit is a contributing factor to decreased access to housing, services, jobs, and opportunities for public participation. AllTransit in an online tracking system that explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to data posted in 2019, Imperial has the very low AllTransit Performance Score of 0.0 (out of 10).</p> <p>(AFH Issue Area: Access to Opportunities - Transportation)</p>	<p>PROGRAM 20: Hold diversity awareness events and programs at a variety of locations throughout the City.</p> <p>TIMELINE: No less than every 2 years, as funding is available.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Work with transit agencies to increase mobility and routes.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Medium	<p>The lack of access to public transit and available housing is a contributing factor to decreased access to jobs. The central portion of the City has the least positive economic outcome while the outskirts of the City are shown to have a more positive economic outcome. No data is provided for the western central portion of the City. While additional housing is being developed during planning period, opportunities to connect residents to job opportunities could increase access to jobs.</p> <p>(AFH Issue Area: Access to Opportunities - Economic Development)</p>	<p>PROGRAM 19: Increase recruitment to lower-income communities and people with disabilities and help connect these groups to employment opportunities in the City.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 19: Continue to expand public outreach on potential employment opportunities and additional employment resources.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Work with transit agencies to increase mobility and routes.</p> <p>TIMELINE: Ongoing throughout the planning period</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
Medium	<p>Imperial households experience cost burdens at lower rates than the surrounding area. However, rental rate trends in the City indicate that 40-60 percent of renters are overpaying and 20-40 percent of owners are cost burdened. Additional housing units in a range of sizes are needed.</p> <p>(AFH Issue Area: Disproportionate Housing Needs – Cost Burden)</p>	<p>PROGRAM 1: Promote development incentives (higher density, reduced parking, and other development standards) to developers active in the region.</p> <p>TIMELINE: Ongoing and at least annually.</p>
		<p>PROGRAM 1: Research Census data related to Vacancy Rates to clarify discrepancies in local data versus regional data to determine whether actions would be required to resolve a vacancy issue.</p> <p>TIMELINE: Once, completed by October 2023.</p>
		<p>PROGRAM 1: Investigate tracking rents for accessory dwelling units.</p> <p>TIMELINE: Once, completed by October 2023, and then updated every 6 months as appropriate.</p>
		<p>PROGRAM 2: The City will maintain an updated inventory of residential housing developments that have been submitted, approved, and denied.</p> <p>TIMELINE: Ongoing and maintained no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 2: The City will amend the Zoning Ordinance by October 2023 to allow, by right, a mix of dwelling types and sizes, specifically missing middle housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) within lower density city residential designations.</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 2: The City will annually monitor the City’s remaining housing capacity to ensure compliance with SB 166.</p> <p>TIMELINE: No less than annually.</p> <hr/> <p>PROGRAM 3: Continue to utilize CDBG and HOME funds to expand affordable housing projects that target and address vulnerable and special needs populations.</p> <p>TIMELINE: Ongoing and at least every 6 months.</p> <hr/> <p>PROGRAM 3: Assist and support developers of housing for lower income households, especially housing for extremely-low-income households and the disabled (including the developmentally disabled), with site identification, supporting applications, conducting pre-application meetings, assisting with design and site requirements, and providing regulatory incentives and concessions.</p> <p>TIMELINE: Ongoing and at least every 6 months.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 8: Annually monitor all residential development fees to assess their impact on housing costs, and if feasible and appropriate, offer financial assistance to affordable housing projects to offset the cost impact of development fees.</p> <p>TIMELINE: No less than annually.</p> <hr/> <p>PROGRAM 13: The City shall rezone or amend its Zoning Code by October 2023 to allow by- right approval for housing developments proposed for non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements, provided that the proposed housing development consists of at least 20 percent lower income and affordable housing units.</p> <p>TIMELINE: Once, completed by October 2023.</p> <hr/> <p>PROGRAM 16: Encourage innovative housing structures, such as micro-unit housing and new shared and intergenerational housing models to help meet the housing needs of aging adults, students, and lower-income individuals citywide.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Target housing creation or mixed income strategies (e.g., funding, incentives, policies and programs, density bonuses, land banks, housing trust funds) and market opportunities in all parts of the community.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Low	<p>The cost of repairs or rehabilitation of older homes can be a limiting factor in meeting housing needs. Housing that is 30 years or older is assumed to require some rehabilitation. Older housing is found in the northern central tracts of City and the age of the housing gets younger in a counterclockwise pattern around the central portion of the City with newer housing occurring along the outer edges.</p> <p>(AFH Issue Area: Disproportionate Housing Needs – Substandard Conditions)</p>	<p>PROGRAM 1: Perform a Housing Conditions Survey of the City’s existing housing stock by October 2023 to identify the need to rehabilitate or redevelop aging homes with the focus to identify opportunities to increase density to better meet the City’s RHNA.</p> <p>TIMELINE: Performed by October 2023 and updated at least every other year.</p> <hr/> <p>PROGRAM 3: The City will investigate funding opportunities to provide rehabilitation services to homeowners and people amongst the vulnerable and low-income communities. Priority will be given to repair and rehabilitate housing identified by the city’s Building Division as being substandard or deteriorating, and which houses lower-income, and in some cases, moderate-income households.</p> <p>TIMELINE: Ongoing and at least every 6 months.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 14: Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 18: Continue to educate all community groups of the services available when it comes to both rental, homeownership, and rehabilitation/maintenance services.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
Medium	<p>As of December 2020, 933 Imperial households received Section 8 assistance from the Imperial Valley Housing Authority. Housing choice voucher (HCV) use is dispersed throughout the City but is concentrated in the southern quadrants of the City. In these tracts, between 15 and 30 percent of the renter households are HCV users. This may be because these areas have a higher concentration of multi-family developments or that these tracts contain a higher concentration of the population with a disability.</p> <p>(AFH Issue Area: Other Relevant Factors – Housing Choice Vouchers)</p>	<p>PROGRAM 14: Nurture ongoing partnerships that help educate and execute the development of safe and health housing communities for all groups of people.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 17: Monitor the status of projects at risk of conversion to market rate and ensure tenants receive proper notification of any changes and are aware of available special Section 8 vouchers.</p> <p>TIMELINE: Ongoing and no less than annually.</p> <hr/> <p>PROGRAM 20: Allocate annual funding for fair housing services through the City's process for the use of CDBG funds.</p> <p>TIMELINE: No less than annually.</p> <hr/> <p>PROGRAM 20: Participate in regional efforts to mitigate impediments to fair housing choice, including participation in the preparation of a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan.</p> <p>TIMELINE: Ongoing throughout the planning period.</p> <hr/> <p>PROGRAM 20: Distribute educational materials to property owners, apartment managers, and tenants relative to fair housing requirements, regulations, and services.</p> <p>TIMELINE: Ongoing and no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities.</p> <p>TIMELINE: Ongoing and no less than annually.</p>
		<p>PROGRAM 20: Outreach targeted and related to home-financing opportunities.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
		<p>PROGRAM 20: Target housing creation or mixed income strategies (e.g., funding, incentives, policies and programs, density bonuses, land banks, housing trust funds) and market opportunities in all parts of the community.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
Low	<p>Loan applicants in the highest income category were more likely to have a loan approved, compared to applicants in the lowest income category where approval rates were consistently under 50 percent. Additionally, within each income category, applicants who identified as White consistently had higher rates of approval than applicants of color of who identified as Hispanic or Latino. Overall, applicants who identified as Black or African American, Native Hawaiian or other Pacific Islander, and American Indian or Alaska Native had the lowest rates of loan approval in many income categories. With approximately 80 percent of the City's population identifying as racial/ethnic minority, discriminatory lending practices could be a limiting factor in home ownership.</p> <p>(AFH Issue Area: Other Relevant Factors – Lending Practices)</p>	<p>PROGRAM 1: Research Census data related to Vacancy Rates to clarify discrepancies in local data versus regional data to determine whether actions would be required to resolve a vacancy issue.</p> <p>TIMELINE: Once, completed by October 2023.</p>
		<p>PROGRAM 20: Participate in regional efforts to mitigate impediments to fair housing choice, including participation in the preparation of a regional Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan.</p> <p>TIMELINE: Ongoing throughout the planning period.</p>
		<p>PROGRAM 20: Distribute educational materials to property owners, apartment managers, and tenants relative to fair housing requirements, regulations, and services.</p> <p>TIMELINE: Ongoing and no less than annually.</p>

Priority Ranking	Contributing Factor	Meaningful Housing Element Program Actions
		<p>PROGRAM 20: Make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities.</p> <p>TIMELINE: Ongoing and no less than annually.</p> <hr/> <p>PROGRAM 20: Conduct fair housing workshops and training in Spanish.</p> <p>TIMELINE: Ongoing throughout the planning period</p> <hr/> <p>PROGRAM 20: Monitor and respond to complaints of discrimination (i.e. intaking, investigation of complaints, and resolution).</p> <p>TIMELINE: Ongoing throughout the planning period</p> <hr/> <p>PROGRAM 20: Conduct fair housing testing at random sites to measure compliance and remove any such impediments through fair housing law enforcement.</p> <p>TIMELINE: No less than annually.</p>