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1. Introduction

1.1 PURPOSE OF THE ENVIRONMENTAL JUSTICE ELEMENT

In 2016, California adopted legislation that requires cities with communities particularly impacted by poor environmental quality, health concerns, poverty, and other socioeconomic factors to adopt Environmental Justice (EJ) Elements as part of their General Plan. This legislation was developed with the intent to create healthier cities and counties by protecting sensitive land uses and prioritizing the needs of disadvantaged communities. The City of El Centro chose to prepare a stand-alone EJ Element for their General Plan so that the public and decision-makers can view their environmental justice policies in one place.

1.2 LEGAL BASIS AND REQUIREMENTS

What is Environmental Justice?

California state law defines environmental justice as the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice works to ensure that all El Centro residents are treated equitably with respect to environmental regulations, and are protected from disproportionate environmental and health burdens, such as exposure to air pollution or limited access to health care facilities.

Environmental Justice Communities

Any jurisdiction can choose to include policies focused on environmental justice 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, about 2/3 of the City of El Centro meets one or both of these definitions.

Based on the pollution data for El Centro, much of the city is disproportionately affected by environmental pollution. In particular, impacts from ozone pollution and pesticides affect the majority of residents.

Because so much of El Centro meets state definitions for low income or disadvantaged communities, and is disproportionately impacted by environmental pollution, the entire city is considered an Environmental Justice Community for the purposes of the policies in this element. While some of the policies in this document are aimed at specific areas, most are relevant to all communities within the City of El Centro.

1.3 SCOPE AND CONTENT OF THE ENVIRONMENTAL JUSTICE ELEMENT

The EJ Element identifies goals and policies to promote environmental justice within EJ communities. Specifically, the EJ Element is required to address:

- Civic Engagement
- Pollution Exposure
- Public Facilities
- Food Access
- Physical Activity
- Safe and Sanitary Housing
Any other unique or compounded health risks not otherwise included in these topic areas

The goals and policies included in the EJ Element must prioritize improvements and programs directed at improving conditions for the EJ communities.

### 1.4 RELATED PLANS AND PROGRAMS

The goals and policies included in the EJ Element complement other efforts in the region to reduce the effect of environmental pollution on vulnerable residents. The following describes some of the key plans adopted to address environmental justice issues.

**Imperial County Community Health Assessment and Plan (2017)**

The Imperial County Community Health Assessment (CHA) and Community Health Improvement Plan (CHIP) identifies priority areas for health improvements in the county, and impact targets within these areas. The three priority areas identified in the CHIP are Health Eating, Active Living; Community Prevention Linked with High Quality Healthcare; and Healthy and Safe Communities and Living Environment. The CHIP includes access to healthy foods, safe and affordable options for physical activity, and air quality improvements among the impact targets within each priority area.

**El Centro Active Transportation and Safe Routes to School Plan (2018)**

The City of El Centro Active Transportation (ATP) and Safe Routes to School (SRTS) Plan is a long-range plan to improve conditions for people who walk and bike in El Centro, with a particular focus on routes to local schools. The plan provides recommendations for future improvements to the active transportation network.

**Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor (2019)**

The Imperial County Community Emission Reduction Plan (CERP) is the first year plan for implementation of the Community Emission Reduction Program in the El Centro-Heber-Calexico Corridor. The CERP outlines targets and implementation strategies for addressing air pollution within the El Centro-Heber-Calexico corridor.
1.5 RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

This is a new addition to the El Centro General Plan. Due to the broad and interdisciplinary nature of environmental justice issues, this element directly relates to each of the other General Plan elements.
2. Goals & Policies

The goals and policies included in the EJ Element are the result of extensive research into the specific health, socioeconomic, and environmental issues that impact El Centro’s neighborhoods.

Civic Engagement

Robust civic engagement requires proactive outreach and collaboration to ensure all residents of El Centro have a voice in the public decision-making process. Addressing environmental impacts begins by listening to the voices of those who have been most affected by pollution, food insecurity, and the cost of housing their families. In particular, the City should focus on historically underrepresented communities such as low-income households and individuals, disabled people, children and youth, seniors, farmworkers, people experiencing homelessness, and others who may have been left out of civic decision-making in the past.

The City of El Centro promotes civic engagement for all its residents through regular public meetings and communication via a variety of methods including the City’s social media, website, and mailings to residents. Surveys conducted as part of the public outreach for the EJ Element showed these were some of the most effective tools for communicating about upcoming City events, projects, and decisions, along with television and newspaper coverage.

**EJ GOAL 1:** An engaged and informed community that participates fully in the public decision-making process.

- **EJ Policy 1.1:** Distribute public information in a variety of formats to reach a wide range of residents, modifying communication methods as technology and practice changes over time.
- **EJ Policy 1.2:** Host regular City Hall meetings and Open Houses to collect information about resident concerns, and connect City staff and elected officials directly with the public.
- **EJ Policy 1.3:** Encourage broad participation by broadcasting public meetings in online/electronic format, allowing remote participation for people who cannot attend in person, varying meeting times throughout the day, providing amenities such as childcare and refreshments for in-person meetings, offering to assist with transportation.
to/from in-person meetings, and hosting in-person meetings in different locations throughout the City.

**EJ Policy 1.4:** Clearly communicate the purpose of outreach efforts, and the role the public will play in decisions or outcomes.

**EJ Policy 1.5:** Maximize the impact of public engagement by bringing residents into the decision-making process as early as possible.

**EJ GOAL 2:** Equitable participation in decision-making by traditionally underrepresented groups, and by stakeholders in EJ communities and throughout the City.

**EJ Policy 2.1:** Provide appropriate translation and interpretation for public meetings, documents, and communications.

**EJ Policy 2.2:** Target outreach towards underrepresented communities, specifically inviting representatives from underrepresented communities to participate in formal decision-making bodies, such as boards, commissions, tasks forces, and committees.

**EJ Policy 2.3:** Develop creative and culturally-appropriate methods for gathering public input, such as storytelling, art, or pop-up events.

**EJ Policy 2.4:** Work to ensure that all community members have a clear understanding of the potential impacts from proposed projects.

**EJ GOAL 3:** Strong collaboration with other government agencies and community groups working to address the environmental justice issues that impact El Centro.

**EJ Policy 3.1:** Communicate regularly and partner with other government agencies, non-profit organizations, and community partners to coordinate efforts to solve regional environmental justice issues, and avoid duplicating efforts.

**EJ Policy 3.2:** Support the efforts of non-profit organizations and community partners, including assisting other agencies and community groups to acquire funding to address identified EJ issues.
Reduce Pollution Exposure

Exposure to pollution can create and exacerbate health problems, particularly within vulnerable populations such as seniors, children, and people with chronic health conditions. Pollution also leads to negative impacts on habitats and ecosystems, disrupting crops, wildlife, and natural resources. El Centro residents are particularly affected by air pollution, pesticides, and solid waste facilities in the region, ranking among the most impacted communities in the state for some types of pollution.

Poor air quality and asthma are consistently ranked as key concerns for residents of El Centro. State data shows that the City is impacted by several types of air pollutants, including ozone, Particulate Matter 2.5, Particulate Matter 10, and Diesel Particulate Matter. Airborne emissions in the City come from windblown dust, road dust, farming, construction, fuel combustion, and biomass burning, often from locations outside the city and state. Local atmospheric conditions during parts of the year often exacerbate the problem by preventing emissions from being dispersed.

In addition to air pollution, state data shows that communities in El Centro are disproportionately affected by proximity to solid waste facilities in the southeast area of El Centro, hazardous waste generators in the area, and by pesticide use in agricultural fields surrounding the City.

Pollution exposure is a complex issue that requires coordination across city, county, and international boundaries. Many of the factors contributing to air pollution in El Centro are outside the City’s direct control, limiting its ability to easily address pollution exposure through local policy change. However, El Centro can continue to take steps to protect residents from pollutants, particularly by focusing on sensitive uses such as residences, schools, libraries, parks and playgrounds, childcare centers, recreation facilities, medical facilities, community centers, and senior care facilities.

**EJ GOAL 4:** The reduction of pollution from existing and new sources in El Centro and the surrounding region.

**EJ Policy 4.1:** Promote the use of low impact development (LID) techniques where appropriate, such as pervious paving or vegetated infiltration, to reduce potential impacts to water quality from urban runoff.

**EJ Policy 4.2:** Maintain City infrastructure in order to reduce or prevent pollution from stormwater runoff.

**EJ Policy 4.3:** Implement paving or dust-control measures for existing unpaved roadways, alleys, and parking lots within the City.
EJ Policy 4.4: Support cross-border efforts to address air pollution from sources in Mexico.

EJ Policy 4.5: Work with County agencies and non-profit organizations such as Imperial County, the Department of Toxic Substances, adjacent cities, the Comite Civico del Valle and others, to encourage reductions in pesticide use by agricultural operations adjacent to City boundaries.

EJ Policy 4.6: Work with State and County agencies such as the Imperial County Air Pollution Control District (ICAPCD), the California Air Resources Board (CARB), the Comite Civico del Valle, adjacent cities, agencies to minimize fugitive dust from sources adjacent to City boundaries.

EJ Policy 4.7: Prohibit the establishment of new solid waste facilities within El Centro.

EJ Policy 4.8: Incorporate electric vehicles, bicycles, and other lower-pollution vehicles into the City’s fleet when possible.

EJ Policy 4.9: Prioritize infill development that reduces driving and promotes active transportation and transit use.

EJ Policy 4.10: Encourage the use of green building techniques and clean technologies that reduce pollution over the life cycle of new projects.

EJ GOAL 5: Mitigation of exposure to pollution in El Centro.

EJ Policy 5.1: Retrofit City-owned sensitive land uses, e.g. libraries, community centers, government offices, etc., with barrier landscaping, ventilation systems, double-paned windows, kitchen exhaust fans, low-VOC paints and furnishings, and other measures to promote indoor air quality.

EJ Policy 5.2: Continue to identify the City’s parks as smoke-free zones.

EJ Policy 5.3: Encourage the installation and regular maintenance of wind barriers at strategic locations to disrupt wind flow and reduce exposure to particulate matter. For planted barriers, encourage the use of drought-tolerant vegetation.
EJ Policy 5.4: Require barrier landscaping, ventilation systems, and other measures that promote improved indoor air quality for new development projects that include sensitive uses such as schools, child care centers, hospitals, or nursing homes.

EJ Policy 5.5: Develop an urban greening program to increase trees and landscaping appropriate for the climate in El Centro.

EJ Policy 5.6: Work with State and County agencies such as the ICAPCD, the CARB, and the Comite Cívico del Valle, to monitor air quality at existing locations of sensitive uses, such as schools, child care centers, hospitals, or nursing homes which are near pollution sources such as truck routes. Where air quality levels exceed acceptable standards as set by the State and County agencies, pursue funding for and implement measures to improve air quality to acceptable levels.

EJ Policy 5.7: Work with the ICAPCD, Imperial County Public Health Department, Comite Cívico del Valle, and other organizations to educate the El Centro community about risks associated with air pollution, resources for real-time information about local air pollution measures, and actions they can take to minimize their own exposure to harmful pollutants.

EJ GOAL 6: Separation of sensitive uses, e.g. residential development, senior facilities, schools, child care centers, hospitals, etc., from pollution sources

EJ Policy 6.1: Consider pollution exposure when evaluating the design and location of projects that include sensitive uses, taking into account the distance from pollution sources, direction of prevailing winds, and any other factors that could compound potential exposure.

EJ Policy 6.2: When possible, locate sensitive uses away from potential pollution sources such as large-scale agriculture, industrial facilities, truck routes, the railroad, and solid waste facilities.

EJ Policy 6.3: Require buffers and/or setbacks between sensitive uses and pollution sources, paying particular attention
to the location of sensitive uses relative to large-scale agriculture, industrial facilities, truck routes, the railroad, and solid waste facilities.

**EJ Policy 6.4:** Working with Caltrans, determine what, if any, mitigation measures can be implemented to reduce air quality and noise impacts from freeway adjacencies.

**EJ Policy 6.5:** Encourage transitional uses, such as open space, office or commercial use, between sensitive uses and pollution sources.

**Promote public facilities**

Public facilities provide important health, education, and quality of life benefits to the communities where they are located. The City of El Centro can adopt goals and policies to ensure that all neighborhoods within the City have access to adequate, high-quality public facilities to meet their needs. These include schools, libraries, recreation centers, parks and playgrounds, community centers, hospitals and other medical facilities, and appropriate transportation, stormwater, and similar public infrastructure.

Incomplete pedestrian and bicycle networks are a key challenge in El Centro, and a barrier to walking and biking that residents consistently cite. In addition, the 2020 Covid-19 pandemic revealed new public infrastructure needs, placing a strain on El Centro’s health facilities and highlighting the critical importance of high-quality internet access for all residents, particularly with regard to distance learning for students and employees who work from home.

Climate change will also bring unprecedented challenges to the City, forcing El Centro to adapt its public facilities to the changing needs and circumstances. Rising temperatures, more forceful weather events, and the possibility of increased pollution impacts from Mexico may all contribute to future public facility needs. As El Centro looks ahead, it must coordinate across jurisdictions and identify the redundancies or modifications to public facilities that may be required to ensure future resilience.

**EJ GOAL 7:** Equitable distribution of public facilities and infrastructure throughout the City of El Centro.

**EJ Policy 7.1:** In neighborhoods where public facilities and infrastructure are missing, or inadequate to meet the needs of the community, prioritize public investment, maintenance, and safety improvements to public facilities, streets, parks, and other key infrastructure.
EJ Policy 7.2: Create safe and comfortable transportation connections between communities of concern and critical public facilities within and outside the City, e.g. El Centro Regional Medical Center, including for residents that do not have access to private vehicles.

EJ Policy 7.3: Facilitate easy and reliable access to broadband or other high-speed internet services for all residents of El Centro by providing information about free or low-cost internet services, partnering with providers and non-profit organizations to increase access to devices and internet service, and other strategies to improve access for all residents.

EJ Policy 7.4: Implement the LUE policies 1.19, 1.20, 1.21 and 1.22 which focus on Parks, Recreation and Open Space.

EJ GOAL 8: State of the art health care facilities to meet the evolving needs of the community and the region.

EJ Policy 8.1: Facilitate the strategic placement of health care service locations, and mobile health care options to ensure access by all residents.

EJ Policy 8.2: Support and enable the expansion of the El Centro Regional Medical Center (ECRMC).

EJ Policy 8.3: Encourage the expansion of the use of innovative tools, e.g. telehealth, especially for underserved populations, to allow for more equal access to healthcare services, particularly during health emergencies.

Increase access to healthy food

A healthy diet is associated with positive health outcomes. Not all neighborhoods have convenient and affordable access to the most nutritious food choices because the majority of the food retailers in El Centro are concentrated along the Imperial Avenue corridor in the western portion of the City, with more limited options in the east and southeast areas of the City. At the same time, many neighborhoods have a disproportionate number of low-nutrition food retailers, such as fast-food restaurants or convenience stores that primarily stock highly-processed food options. Many residents have expressed a desire for additional healthy food outlets within the City.
Residents may also struggle with food insecurity, relying on outside assistance to meet their basic food needs or going without food at all. In particular, low-income residents have indicated that they are not always able to consistently afford adequate food to meet their dietary needs.

The City of El Centro can help to improve residents’ diet and nutrition options by adopting goals and policies that increase the availability of healthy food for all residents. Healthy food policies should consider the context of the communities they target, respecting their distinct food cultures and traditions. Policies should also focus on making healthy eating simple and convenient, and avoid putting disproportionate time or cost burdens on residents in order to improve health outcomes.

**EJ GOAL 9:** Reliable and convenient access to healthy food for all members of the El Centro community.

- **EJ Policy 9.1:** Support efforts to address food insecurity in El Centro, including distributing information about food assistance programs.

- **EJ Policy 9.2:** Collaborate with local agencies and community organizations to eliminate food waste and promote redistribution of food that would otherwise go unused.

- **EJ Policy 9.3:** Support healthy eating programs and policies that respect the food culture, traditions, and identities of the residents of El Centro.

- **EJ Policy 9.4:** Eliminate barriers to small-scale businesses that provide healthy, affordable, and convenient food options, such as street vendors, produce stands, food trucks, or mobile produce retailers.

- **EJ Policy 9.5:** Include flexible space on city-owned property and in larger developments for farmer’s markets, Community Supported Agriculture (CSA) pickup, produce sales, or other vendors to offer healthy, affordable, and convenient food choices.

- **EJ Policy 9.6:** Encourage food retailers located within walking distance of communities of concern to stock fresh, frozen, and canned produce, nutritious prepared foods, and other healthy choices.
EJ Policy 9.7: Support sustainable transportation choices, such as shuttle services or direct transit routes, that provide safe and easy access to and from food retailers offering healthy, affordable, and convenient food options.

EJ GOAL 10: Positive messaging and education about healthy eating habits.

EJ Policy 10.1: Offer healthy food and beverage choices at City-sponsored events and meetings.

EJ Policy 10.2: Require food vendors at city-owned properties to offer healthy food and beverage options.

EJ Policy 10.3: Collaborate with other local agencies, such as the Imperial County Public Health Department, to provide nutrition classes, food tastings, and healthy cooking demonstrations at key community locations such as parks, schools, libraries, or community centers.

EJ Policy 10.4: Use City platforms, such as the City’s social media and the website, to promote positive messaging around nutrition and healthy eating in ways that respect the food culture, traditions, and identities of the residents of El Centro.

EJ GOAL 11: A balanced food environment with high-quality food outlets.

EJ Policy 11.1: Encourage food retailers to offer healthy food choices and prohibit alcohol and tobacco sales when locating adjacent to school sites, parks, playgrounds, and recreation centers.

EJ Policy 11.2: Support the efforts of other local agencies and community groups working to encourage food retailers to provide consumers with nutritional information, and make healthy food options more prominent.
Promote opportunities for physical activity

Regular physical activity can improve overall health outcomes and quality of life for residents of EJ communities. Recreation provides opportunities to build community, decrease stress, and reduce chronic health conditions such as obesity or heart disease.

Some of the City’s neighborhoods lack the infrastructure or community facilities to make physical activity a safe and pleasant option. In parts of El Centro, disconnected transportation networks, criminal activity, lack of lighting, insufficient code enforcement, and vacant or neglected properties discourage outdoor recreation. Residents explain that these factors lead to concerns about personal safety that can prevent them from taking part in regular physical activity outdoors. The seasonally hot temperatures and poor air quality events present a challenge for the types of physical activities that are available and appropriate for much of the population.

The City of El Centro has worked to promote physical activity through its Active Transportation and Safe Routes to School Plan, and by developing new recreational spaces such as the El Centro Aquatic Center, Sidewinder Skate Park, and the MLK Jr. Sports Pavilion. The City can continue to encourage physical activity through policies that address the challenges unique to El Centro, tailoring opportunities for physical activity to the specific needs of the City’s residents. This will allow regular physical activity become a safe and easy part of everyday life for El Centro residents.

**EJ GOAL 12:** Offer a variety of recreation opportunities to meet the needs and abilities of people throughout El Centro.

**EJ Policy 12.1:** Continue to seek ways to provide safe recreational space and programing appropriate for appropriate for El Centro’s climate, such as dance studios, exercise studios, indoor or covered playgrounds, or others that take into account the impact that excessive heat and/or poor air quality may have on residents’ ability to recreate outdoors.

**EJ Policy 12.2:** Design and program parks and recreational spaces to promote public safety and discourage dangerous or criminal activity.

**EJ Policy 12.3:** Ensure recreational programming is accessible to people of all ages and abilities, and conduct outreach
to ensure residents are aware of recreational programming provided within El Centro

**EJ Policy 12.4:** Require larger new development or redevelopment to incorporate parks, open space, or other recreational facilities and make them available to the public.

**EJ GOAL 13:** Safe and comfortable spaces for active transportation and physical activity.

**EJ Policy 13.1:** Continue to enforce the City’s vacant property registration ordinance, working with property owners to ensure buildings, landscaping, and vacant parcels are well-maintained, free of graffiti, and lit appropriately to promote public safety. Regularly publicize registration requirements, and educate property owners about how and when they must register vacant properties.

**EJ Policy 13.2:** Provide a well-maintained sidewalk and bike network throughout El Centro, focusing on access along key corridors and roadways that connect EJ communities to vital services and community facilities.

**EJ Policy 13.3:** Ensure adequate lighting, shading, and landscaping is in place along key active transportation routes throughout the City.

**EJ Policy 13.4:** Identify locations for safety improvements to the active transportation network based on data about travel patterns, crash locations, and key destinations within El Centro, prioritizing travel by and within communities of concern.

**EJ GOAL 14:** An active transportation network that connects important locations throughout the City.

**EJ Policy 14.1:** Provide active transportation connections within new development, and between new developments and key destinations in the City.

**EJ Policy 14.2:** Work with the Imperial County Public Health Department and local school districts to continue to implement the City’s Active Transportation Plan and Safe Routes to School Plan.
Address housing safety, affordability and homelessness

A lack of affordable housing is a key issue in El Centro and throughout California. The cost of housing can place an excessive financial burden on low-income residents, shifting money away from other critical expenses such as food or healthcare. This is particularly true for low-income renters in El Centro, who spend a disproportionate amount of their income on housing compared to residents in higher income categories. Limited variety in the type and configuration of housing stock, and an overall shortage of available housing, can make it difficult for residents to find housing that meets their needs. Residents consistently cite lack of housing affordability and homelessness as some of their top concerns.

At the same time, older housing kept in poor repair can present its own set of risks. Outdated housing materials, lack of maintenance, and overall neglect can create dangerous conditions for residents. El Centro’s warm climate can also be a challenge if housing lacks adequate insulation or cooling sufficient for the months of the year with excessive heat.

**EJ GOAL 15:** Safe and well-maintained housing for all residents of El Centro.

- **EJ Policy 15.1:** Support and partner with other local agencies to and responsibilities for maintenance and upkeep of properties, including regular outreach to absentee landlords.

- **EJ Policy 15.2:** Minimize permit costs to perform maintenance and improvements to housing to ensure basic safety needs are met for all residents.

- **EJ Policy 15.3:** Focus City enforcement efforts on improving unsafe and unsanitary conditions, particularly trash and dumping, graffiti, overcrowding, animal control, and poor property maintenance.

- **EJ Policy 15.4:** Work with the Imperial County Public Health Department to create and actively enforce a Lead Paint Program.

**EJ GOAL 16:** A diverse range of housing options affordable to residents at all income levels.

- **EJ Policy 16.1:** Allow a wide variety of housing types to meet the needs of people during all life stages, allowing for a diverse range of household types.
EJ Policy 16.2: Remove regulatory barriers and minimize permitting costs for accessory dwelling units.

EJ Policy 16.3: Encourage infill development to increase the housing supply throughout El Centro, focusing density around community hubs and other strategic locations in the City.

EJ Policy 16.4: Incentivize the development of townhomes, condominiums, and other small “starter” homes for people entering the housing market for the first time.

**EJ GOAL 17:** A strategic approach to reducing the number of residents experiencing homelessness in El Centro.

EJ Policy 17.1: Collaborate with local agencies and community groups working to address homelessness in El Centro and the surrounding region to ensure a coordinated effort.

EJ Policy 17.2: Pursue opportunities for homeless services and outreach to connect chronically homeless individuals and families with services and programs that can move them into permanent, stable housing.

EJ Policy 17.3: Work closely with health agencies and non-profit organizations to provide services to address key reasons for homelessness, such as mental health and substance abuse issues.