

## **B. Housing Needs, Resources and Constraints**

*Note: Responses to Finding A.1. relating to AFFH are provided below.*

### **Comment 1:**

Disproportionate Housing Needs and Displacement Risk: The element was revised to include an analysis of cost burden, but it should also address patterns and trends related to overcrowding and displacement risk.

### **Response 1:**

#### Disproportionate Housing Need and Displacement Risk

The AFFH Guidance for All Public Entities and for Housing Elements (April 2021 Update) 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 need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area.’ Disproportionate housing needs range from overcrowding and overpayment to housing conditions disproportionately affecting protected classes, including displacement risk.

#### *Overcrowding*

As discussed under Existing Housing Stock (Table III-18), overcrowding is not a significant issue in the City of Palm Desert. As of the 2014-2018 ACS, only 4.0% of households in the City are considered overcrowded, with a higher percentage of renter households (8.0%, or 741 households) experiencing overcrowding. Among owners, 1.5% of households (218 households) experience overcrowding. The overall overcrowding rate (4.0% in 2018) in Palm Desert has remained constant compared to 2014; specifically, overcrowding has improved slightly for owners but worsened for renters. Compared to an overcrowding rate of 6.9% in the Riverside County (2018), overcrowding in Palm Desert is less significant. Both the renter overcrowding rate (8.0%) and owner overcrowding rate (1.5%) are lower than that of the County (11.8% and 4.3%, respectively). The slightly more severe overcrowding situation for renters in Palm Desert may result from insufficient supply of housing units or choice of lower income households to limit spending on housing. The City has entitled two projects with up to 99 affordable rental units that will be deed restricted and is actively facilitating at least three projects pending entitlements with 130 affordable rental units.

#### *Overpayment*

A comparison to cost burden and severe cost burden based on 2010-2014 data in the AFH to 2013-2017 data (Table III-43) shows that the percentage of cost burdened households dropped significantly for both renters and owners. However, nearly half (48.2%) of renters experience overpayment. The median rent (\$1,260, Table III-44) in Palm Desert would result in a 4-person households with very low income (\$37,650, Table III-42) to overpay. As the 2013-2017 CHAS shows in Table III-43, 72.7% of all lower-income households in Palm Desert pay at least 30% of their income toward housing costs; among them, 67.8% of lower-income owner households are

overpaying and 77.0% lower-income renter households are overpaying. However, as shown in Figure 6, overpayment by renters in 2019 was not a unique situation in Palm Desert, rather it is a chronic issue to be addressed both locally and regionally. Regionally, overpayment among renters tends to be higher in the western and eastern Coachella Valley, including the cities of Desert Hot Springs and Coachella and unincorporated areas of Riverside County. The City is in a generally similar but slightly better situation compared to the region. For example, a much lower percentage (9.18%) of the City's family households with fewer than five persons experience severe housing cost burden compared to the Region's (18.78%), and no Native American households in the City had severe housing cost burdens while 19.53% of the Region's households did. The City of Palm Desert sees a similar extent of renter overpayment to the cities of Rancho Mirage, Cathedral City, Palm Springs and Indio, but more overpayment than the cities of Indian Wells and La Quinta. In the Coachella Valley, overpayment among owners is less prevalent compared to renters. Most of the valley saw fewer than 60% of owners experience overpayment in 2019, including the entire City of Palm Desert. Certain portions of the City have fewer than 40% of owners overpaying for housing. Overpayment increases the risk of displacement for residents who can no longer afford their housing costs. The City has included all the programs under Goals 1 & 2 to carry out planned affordable housing projects and preserve and maintain existing affordable units. The City also aims to ensure adequate Section 8 housing assistance through outreach to the County Housing Authority.

#### *Substandard Housing Conditions*

Over half (63.6%) of the housing stock in Palm Desert is older than 30 years, with approximately 11.4% over 50 years old. Older houses often require some type of repair or rehabilitation, and the cost of such repairs can be prohibitive, which makes the owner or renter live in unhealthy, substandard housing conditions or get displaced if the house is designated as uninhabitable and the owner does not complete repairs. However, older homes, particularly those built during the mid-century period in the City are sought after, and are more likely to be conserved. The City refers lower income households to SCE's HVAC replacement program, averaging about 7 referrals annually when replacement of HCAC units is required. The City also runs a Home Improvement Program (HIP) to assist lower-income households with home repairs depending on funding availability. While only the Emergency Grant Component is currently funded, the City will consider CDBG funds to allow more participants in the HIP, especially for the units identified as lacking adequate kitchen and plumbing facilities (Program 2.A). The City will continue to provide program materials in languages other than English, as needed (see Program 11.A).

[...]

#### *Displacement Risk*

The Urban Displacement Project (UDP) is a research and action initiative of the University of California Berkeley and the University of Toronto. UDP conducts community-centered, data-driven, applied research toward more equitable and inclusive futures for cities, and contributed the Sensitive Communities map to HCD's AFFH Data Viewer. Communities are designated sensitive if "they currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost." The following characteristics define vulnerability:

- Share of very low-income residents is above 20%; and
- The tract meets two of the following criteria:
  - Share of renters is above 40%,
  - Share of people of color is above 50%,
  - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median,
  - They or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases), or
  - Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).



The Sensitive Communities – Urban Displacement Project map (Figure 8) identified four census tracts in the City that are considered vulnerable to urban displacement. These tracts are located along Highway 111 and in the central City, and mostly overlap with areas that have lower than state median income (Figure 3), more diverse populations (Figure 2), and at least 40% of renters experiencing overpayment (Figure 6). These areas are primarily built out with minimal land available to support new affordable housing development. None of the currently affordable

housing apartments in these areas are at risk of losing affordability restrictions within 10 years of the 2021-2029 planning period, and the City is committed to maintaining long term affordability of these units (Program 3.D). Sites T, LL, PP, QQ, and DD/10 in the Vacant Land Inventory are located within these areas, which will offer up to 452 affordable units, most of which are already entitled. These upcoming developments will help alleviate displacement risks for lower income households in the tracts identified as vulnerable.

**Comment 2:**

Local Data and Knowledge, and Other Relevant Factors: The revised element generally does not address this requirement. The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes about the City related to fair housing issues. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. Also, the element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use and investment practices or other information and demographic trends.

**Response 2:**

**Outreach**

[...]

The City conducted extensive outreach during preparation of the 2017 Assessment of Fair Housing (AFH) in accordance with HUD's AFFH Rule Guidebook. Meaningful input from the community participation process include the Inland Regional Center's statement that their clients will require HUD based affordable housing options due to the low amount of monthly income they receive, and Coachella Valley Housing Coalition (CVHC)'s comment that tax credits applications for developments located in the high opportunity neighborhoods will be more competitive in the future. These comments are incorporated in the programs and actions in the 2017 AFH and this Housing Element Update to increase affordable housing supply in high opportunity areas and specifically housing for disabled persons.

**Assessment of Fair Housing**

[...]

Integration and Segregation Patterns

[...]

*Familial Status*

[...]

*Additional Local Knowledge and Data*

As is the case for the entire Coachella Valley, there has not been policy-based segregation such as redlining in Palm Desert. The region is not metropolitan, has a relatively short urban development history (mostly post World War II), and does not have a large African American population (e.g. 2.5% of total City population in 2018) or cultural presence. This coincides with the lack of any

apparent segregation patterns. The City's 2017 AFH identified a low segregation level for each racial/ethnic group, including Non-White/White, Black/White, Hispanic/White, Asian or Pacific Islander/White. According to the Neighborhood Segregation Map by UC Berkeley (2019), much of the City are Latinx-White neighborhoods, while certain portions of the northern and southern City are mostly White and one area in the central City is a Asian-Latinx-White neighborhood. This is consistent with the racial makeup of the City, with White being the majority group (82.5%), the largest minority group being Asian (5.1%), and Hispanic/Latino of any race taking up 25.5%. The neighborhood distribution is generally shaped throughout the City history and economic development, and has not been affected by public policy in contrast to metropolitan areas. The mostly White neighborhoods are almost all country clubs, golf/tennis clubs and resort land uses, and the Asian-Latinx-White neighborhood in the central City is most likely associated with student population of the College of the Desert.

Coachella Valley, including Palm Desert, is the ancestral homeland of Cahuilla Indians, who have lived in the area for millennia. After the arrival of Europeans in the 19th century, Palm Desert had only ranches, date palm orchards, and farmland in the 1920s. Land acquisition and development mainly occurred after WWII, with the first golf course and tennis club established in 1952. Country clubs and resort uses soon bloomed, with as many as 30 golf clubs in the City. The City, only incorporated in 1973, is now a popular retreat for seasonal residents and has also attracted more permanent residents from more expensive and populated areas. Therefore, as noted throughout this assessment of fair housing and Housing Element, the City's current development pattern consists of primarily private country clubs, resort, and planned residential development. Given the development history, land availability would limit the distribution and development of various housing projects, including affordable housing. However, the City has managed to locate/acquire existing affordable housing projects including rental and ownership units in the highest and high opportunity areas such as the Highway 111 corridor and the northern City. With the advantage that the entire City is rated Highest/High Resource, the City strives to distribute new affordable housing sites throughout the City despite the land availability constraint, as discussed in the Sites Inventory section below.

#### Enforcement and Outreach Capacity

[...]

HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO) provided case records for Palm Desert in July 2021. Fifteen fair housing cases were filed with their office during the previous planning period, with seven based on disability, four based on familial status, three on retaliation, two on religion and one each based on race/sex/national origin. Note that three of the cases were filed on multiple bases. Six of these cases were closed due to no cause determination, and one case remains open. Seven cases were closed with successful conciliation/settlement for issues such as refusal to rent, discriminatory advertising/acts/terms and conditions, or failure to make reasonable accommodation. All but two of these cases were handled through the Fair Housing Assistance Program (FHAP), in which HUD funds state and local agencies that administer fair housing laws that HUD has determined to be substantially equivalent to the Fair Housing Act. The California Department of Fair Employment and Housing (DFEH) is the only certified agency for FHAP in California. Because state law has more protected classes than federal

law, DFEH may have additional case records. A request was made in July to DFEH, and they provided data on closed cases on September 10, 2021.

During the 2014-2021 planning period, DFEH had nine closed cases in Palm Desert. Three of these were dismissed after investigation most likely due to insufficient evidence, and another three were closed due to no cause determination. Of the remaining cases, two were filed based on disability, with one harm being reported as denied reasonable accommodation and rental/lease/sale. These two cases were closed after settlement by mediation or successful conciliation/settlement. The other case was filed on the basis of familial status (children), with the harm being denied rental/lease/sale, and was settled voluntarily by the Dispute Resolution Division (DFEH staff).

FHCRC and DFEH did not provide additional location details for cases either because they do not track the geographic origin of complaints or due to confidentiality concerns. The case records reported above by local and regional service providers identify the most frequently filed case basis in Palm Desert to be disability. This is consistent with the finding in Riverside County's Analysis of Impediments to Fair Housing Choice 2019-2024 (2019 AI). The 2019 AI determined that discrimination against persons with disabilities is a standing impediment to fair housing choice. Although the County addressed the issue through education and outreach to housing providers through workshops, audits, information and referrals, nearly 63 percent of all fair housing complaints received by FHCRC during 2013-2018 in the County were on the basis of disability. Among other prior impediments assessed in the 2019 AI, lack of available housing and affordable housing are found to be market conditions rather than a discriminatory practice or impediment to fair housing. This finding concurs with the City's development history and land use pattern, which were shaped by the market rather than policies. Other prior impediments, such as rental advertising and viewing the unit, credit check/leasing, predatory lending/steering and other lending/sales concerns have been addressed through extensive education, training and other resources offered by the FHCRC and County for various stakeholders in these processes. Habitability/construction evictions was removed from impediments to fair housing choice due to insufficient public data. The 2019 AI identified a new impediment in County land use policies on transitional and supportive housing, which is irrelevant to the City of Palm Desert with its own zoning code.

The 2019 AI recommended that the County and its fair housing service provider should continue and expand education and resources for property owners, managers and residents on laws pertaining to reasonable accommodations and reasonable modifications, which are among leading reasons for discrimination on persons with disabilities. Workshops on housing rights of persons with disabilities, as well as free landlord-tenant services offered by fair housing service providers are also recommended to reduce and eliminate discrimination. These recommendations also shed light on how the City can address potential discrimination on persons with disabilities, which are reflected in Programs 4.B and 5.B. Apart from actively engaging with developers to increase housing supply for protected classes (Programs 1.D and 3.E), the City continues to work with agencies and local organizations to affirmatively further fair housing through information dissemination, education, outreach and referral (Programs 4.A and 11.A).

**Comment 3:**

Contributing Factors: The element was revised to provide a more concise summary of contributing factors, goals, and programs to address the factors. However, the contributing factors should be updated and prioritized based on the complete analysis of the factors described above.

### **Response 3:**

#### **Contributing Factors**

Discussions with community organizations, government agencies, affordable housing developers, and the assessment of fair housing issues identified several factors that contribute to fair housing issues in Palm Desert, including:

- Lack of affordable, accessible units in a range of sizes: Families with children and disabled people have a high need for affordable housing.
- Lack of access to opportunity due to high housing costs including rising rents: Severe cost burdens greatly reduce the income available to meet other family needs including food, childcare, and medical expenses. This contributing factor also impacts households with one or more disabled member.
- Housing production out of balance with housing demand: New housing is needed to meet the housing needs of all income groups and fair housing protected classes.
- Housing discrimination during the rental/leasing process, particularly against persons with disabilities.

Based on this assessment, most of these contributing factors can be attributed to a common issue of limited options and supply. The City identified three goals to further housing equity in Palm Desert: 1) preservation of affordability of housing units that could convert to market rate housing, 2) increasing the number of affordable units for families with children and people with disabilities or other special needs, 3) increasing awareness among residents of housing discrimination and how to file complaints with local, state and federal agencies. These goals target all contributing factors to fair housing issues identified above, and are incorporated into the Goals, Policies, and Programs section. Programs 4.A and 11.A focuses on information dissemination to all segments of the City population for affirmatively furthering fair housing and combating discrimination. Additionally, the City has incorporated meaningful actions that address disparities in housing needs and in access to opportunity for all groups protected by state and federal law, through preservation and new development of affordable housing and encouraging a variety of housing products including accessory dwelling units. (See Programs 1.A-G, 2.A, 2.B, 3.B-D)

### **Comment 4:**



Site Inventory: The revised element includes a discussion stating that the City is designated as highest resourced and that sites are near a variety of resources and amenities. However, sites identified to accommodate the lower-income regional housing need allocation (RHNA) appear concentrated in the Town Center Neighborhood in the northern part of the City. The element must evaluate this concentration and include discussion of whether the sites inventory improves or exasperates existing patterns.

#### **Response 4:**

##### **Sites Inventory**

The City extends into the Santa Rosa Mountains in the south, and much of the area near the southern City boundary is designated as Open Space on the General Plan and not available for development. The City is primarily built out, and future housing development will occur as mainly infill projects and on the north side of the City which has larger vacant parcels.

As shown in the inventory map associated with Table III-47, the sites identified for the inventory are located in different parts of the City in various zoning districts and dispersed to the extent possible with available lands, which will encourage a mix of household types across the City. Most of the sites identified for this Housing Element, primarily those located along the Highway 111 corridor, will result in small-lot development and housing affordable to lower-income households. The RHNA sites designated for lower income units are distributed across the City with various General Plan designations, from the Highway 111 corridor (Sites T, LL) to central (Sites PP, QQ, KK, DD) and northern City (Sites A-F, H). Their General Plan designations include Small Town Neighborhood, Neighborhood Center, Suburban Retail Center, Regional Retail, Town Center Neighborhood, Public Facility/Institutional, and Employment Center. Above moderate income units are expected to be market-driven, single-family homes traditionally built in the City (see Table III-48). The above moderate income projects are located throughout the City, many of which are near affordable housing sites (Sites B & 12, Sites D, 14 & 16) or part of the same project as affordable units (for example, Site DD/10, see map next to Table III-48). The vacant sites that are zoned suitably for multiple income categories are typically found on the central and north sides of the City, where larger vacant parcels are available for mixed-income projects which combat potential segregation and concentration of poverty by providing a variety of housing types to meet the needs of residents in these areas. The sites' zoning designations include Housing Overlay District (all sites), Planned Residential, Planned Commercial, Public Institution, Residential Single Family, and Residential Multiple Family.

##### Integration and Segregation: Race and Income

As noted, there is no area of identified segregation in or near Palm Desert, and sites in the inventory are located in areas with a wide range of diversity ratings (Figure 2). Site LL in the Highway 111 corridor is in an area with lower median income (<\$55,000), Sites PP, QQ, DD/10 are in an area with a slightly higher percentage of population below poverty level (<30%), Sites T and LL are in an area where >80% of renters experience overpayment. The location of lower income RHNA sites like T, LL, PP, QQ will expand affordable housing supply for households in need and alleviate



renter overpayment in these highest and high resource areas. Site DD/10 as an mixed-income site for lower, moderate and above moderate income households will further promote a more economically diverse and integrated community. The Land Inventory is not expected to exacerbate any existing patterns of segregation based on race and income, but rather will enhance integration.

#### Access to Opportunity

The City examined the opportunity area map prepared by HCD and TCAC (Figure 1). The opportunity area map designates the majority of the City as “Highest Resource”, and the remaining as “High Resource”, which indicate areas whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. Using the statewide opportunity area map, local knowledge, and indicators of segregation, displacement risk, and access to opportunity as overlays to the City’s vacant land inventory, the City was able to identify sufficient sites for affordable units in Palm Desert’s sixth cycle inventory (See Land Inventory section of this Housing Element and Table III-47) in areas identified by TCAC/HUD as either “Highest Resource” or “High Resource” with the highest Jobs Proximity Index scores.

Several sites identified for affordable housing are located along the Highway 111 corridor, which offers a variety of resources and amenities. Multiple bus routes serve the area, which provide local and regional connectivity in the City, Coachella Valley and Riverside County. The Highway 111 corridor area features walkable streets and neighborhoods, and provides walking access to retail, restaurants, grocery and personal services. Several elementary and middle schools are located nearby, as well as a community college and public facilities such as library and aquatic center. These future housing sites affirmatively further fair housing through their close proximity to jobs, neighborhood retail and services, education and transit, all of which can reduce the overall cost of living for lower-income households. The stores, restaurants and offices in both the Highway 111 and El Paseo commercial districts provide varied job opportunities.

The northern City has more and larger vacant lands with great development potential, and accommodates RHNA sites of all income levels. These projects are generally within a one-mile radius of the large commercial plaza on Monterey Avenue or neighborhood-serving developments including grocery shopping and restaurants near Country Club Drive. Existing preschool, elementary and high schools are generally within a two-mile radius.

The City analyzed environmental constraints, including wildfire zones, 100-year flood zone, and 500-year flood zone, and confirmed that none of the sites identified are within or near any identified hazard zones. The sites identified in the vacant land inventory are not at risk of any environmental hazards. Evidence provided by the HUD tables and maps reveal there are no disparities in access to environmentally healthy neighborhoods. When compared with the Region, the City residents scored much higher. The City ranged from 53.59 for Whites to 62.28 for Asians. This is a much narrower range than the Region and demonstrates there are no significant differences in labor market access experienced by the different racial and ethnic populations living in Palm Desert. Overall, the Land Inventory is expected to improve access to opportunities for households in need by expanding affordable housing supply in highest and high resource areas.

Disproportionate Housing Needs

Based on the fair housing assessment, while the City offers a good selection of affordable housing units and has a slightly higher vacancy in rental units as of 2018, expanded housing options at a diversity of price-points can help alleviate overcrowding, overpayment and encourage a more economically diverse community. Areas along the Highway 111 corridor and in the central City generally have lower median income, higher percentage of population below poverty status and low to moderate income (LMI) population, and are identified as sensitive communities to displacement. In particular, Tract 451.08 on the north of the Highway 111 has over half (53.3%) low to moderate income population and over 60% of renters overpaying. The City is actively maintaining affordable housing projects including in the Highway 111 corridor, such that none of the apartments are at risk of losing affordability restrictions during or within 10 years of the 2021-2029 planning period. The City will complete the RFP process for Sagecrest Apartments (Site LL) to provide at least 28 units for lower income households in Tract 451.08. The City adopted the Housing Overlay in 2020 and placed it on all Inventory sites including Site LL and Site T in Tract 451.08. Implementation of the overlay will provide significant incentives to developers for provision of affordable units including development fee waivers, development standard reductions, and parking reductions (Program 8.A). The Land Inventory and accompanying programs are expected to increase affordable housing supply and meet the diverse needs of all segments of the community.

**Comment 5:**

Goals, Priorities, Metrics, and Milestones: Goals and actions must significantly seek to overcome contributing factors to fair housing issues and should be revised based on the outcomes of a complete analysis. Currently, the element identifies program(s) to encourage and promote affordable housing; however, most of these programs do not appear to facilitate any meaningful change nor address AFFH requirements. Furthermore, the element must include metrics and milestones for targeting significant fair housing results.

**Response 5:**

**Goal 3**

The City shall affirmatively further fair housing through new affordable housing developments, information dissemination and education for stakeholders, and collaboration with local and regional organizations and agencies.

**Program 1.D**

As a key long-term strategy to meaningfully assist fair housing protected classes, the City shall continue to implement the Self Help Housing program when funds are available. The City will work with agencies such as Habitat for Humanity and Coachella Valley Housing Coalition to identify funding and the location of these units. This includes the construction of the 14 homes on

Merle, secured with CVHC. The City will implement the provisions of its agreement with CVHC to assure the completion of the 14 self-help units by 2024.

**Responsible Agency:** Housing Authority

**Schedule:** 2022-2024 for Merle lots, annually throughout planning period

### **Program 3.E**

To ensure adequate access to opportunities for fair housing protected classes, such as families with children and lower income households, the City will host meetings between affordable housing developers and social service agencies when new projects are developed to encourage the integration of services such as child care, job training, vocational education, and similar programs into new affordable housing projects through direct contact with both parties. For on-site child care, the City shall consider allocation of the City's Childcare Mitigation Fee to new projects which provide the service.

**Responsible Agency:** Housing Authority, Community Development Department

**Schedule:** As projects are proposed and during pre-application meetings with the City

### **Program 4.B**

The City shall work with the Senior Center and other appropriate agencies including the Fair Housing Council of Riverside County and nonprofit groups (e.g. Habitat for Humanity) in the housing of disabled residents. Advertise workshops and webinars held by these organizations on anti-discrimination on the City's email newsletter and Resources on the Affordable Housing webpage. The City will annually train staff at the Senior Center and Housing Authority properties in the needs of disabled residents, the requirements of the Americans with Disabilities Act, and the City's Reasonable Accommodation policy.

**Responsible Agency:** Housing Authority, Senior Center

**Schedule:** At each update of affordable housing webpage and annually through staff training program

### **Program 5.B**

To increase housing supply for disabled persons, the City will continue to coordinate with the Inland Regional Center, Desert Arc and other appropriate agencies and organizations that serve the developmentally and physically disabled population. The City will continue to encourage developers to reserve a portion of affordable housing projects for the disabled, including those with developmental disabilities and emphasize their needs and what the City can provide during developer outreach and meetings. The City will support funding applications for such projects, and will consider fee waivers and reductions on a case-by-case basis. Housing Authority properties are one of the vehicles available to encourage rental to developmentally disabled individuals and demonstrate compliance with the City's Reasonable Accommodation policy.

**Responsible Agency:** Planning Department

**Schedule:** As projects are proposed and during pre-application meetings with the City

### **Program 11.A**

Continue to provide multilingual brochures and informational resources to inform residents, landlords, housing professionals, public officials, and others relevant parties about fair housing

rights, responsibilities, and services, with an emphasis on needs of disabled persons. Brochures and flyers shall be available on the City website (Resources on the Affordable Housing webpage), at Housing Authority properties, the Public Library, and City Hall, and at County social service agency offices in the City, in order to assure that they are available to all community members. (Also see Program 4.A)

**Responsible Agency:** Housing Authority

**Schedule:** Ongoing, at each update of affordable housing webpage and preparation of public outreach materials