



City of Palm Desert
**Five Year
Consolidated
Plan 2023-
2028**

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INTERNATIONAL

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

Each year the US Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the City of Palm Desert, specifically Community Development Block Grant (CDBG) funds. In order to receive these funds, the City must complete a report every three to five years called the Consolidated Plan.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlements the opportunity to shape these housing and community development programs into effective, coordinated neighborhood and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

As the lead agency for the Consolidated Plan the City of Palm Desert hereby follows HUD's guidelines for citizen and community involvement. Furthermore, it is responsible for overseeing these citizen participation requirements, those that accompany the Consolidated Plan.

The City of Palm Desert has prepared this Consolidated Plan to meet the guidelines as set forth by HUD and is broken into five sections: The Process, Needs Assessment, Market Analysis, Strategic Plan, and Annual Action Plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The goals of the CDBG program administered by the City of Palm Desert are to provide decent housing, a suitable living environment for the city's low- and moderate-income residents, and economic opportunities for low-moderate income residents. The City strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities. These goals are further explained as follows:

- *Providing decent housing* means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing

availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.

- *Providing a suitable living environment* entails improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- *Expanding economic opportunities* involves creating jobs that are accessible to low- and moderate-income persons; making down payment and closing cost assistance available for low- and moderate- income persons; promoting long term economic and social viability; and empowering low-income persons to achieve self-sufficiency.

3. Evaluation of past performance

The City of Palm Desert’s evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). These documents state the objectives and outcomes identified in each year’s Annual Action Plan and include an evaluation of past performance through measurable goals and objectives compared to actual performance. These documents can be found on the City’s website at:

<https://www.palmdesert.gov/departments/special-programs/community-development-block-grant-cdbg>

4. Summary of citizen participation process and consultation process

A variety of public outreach and citizen participation was used to develop this Consolidated Plan. The 2023 Community Development survey was used to help establish priorities for the City by gathering feedback on the level of need for housing and community development categories. A public meeting was held prior to the release of the draft plan to gather feedback on preliminary findings. Once the Plan was released for public review, a public hearing was held to offer residents and stakeholders the opportunity to comment on the plan.

5. Summary of public comments

There were no public comments received.

6. Summary of comments or views not accepted and the reasons for not accepting them

There were no public comments received.

7. Summary

The City’s efforts in the development of this Consolidated Plan are represented by the efforts to establish the Strategic Plan. The Priority Needs and Goals outlined in the Strategic Plan are reflective

the needs in the City of Palm Desert, particularly low to moderate income households. The goals are presented below:

- Support essential senior services
- Support public and community facilities improvements
- Preserve affordable housing
- Support fair housing initiatives
- Fund vital community and homeless services

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	PALM DESERT	
CDBG Administrator		City Manager's Office / City of Palm Desert
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City's Finance Department is the designated department responsible for undertaking all activities associated with CDBG including the day to day administration and details associated with regulations. Other involved agencies are those non profit organizations and public entities that provide direct services to target groups, as well as the Continuum of Care (CoC) that assists in carrying out goals and objectives outlined for homeless activities.

In addition, the City established the Palm Desert Housing Authority ("Authority") to operate the former Palm Desert Redevelopment Agency's affordable housing portfolio. Subsequently from the elimination of redevelopment agencies, the City designated the Authority as the successor of all housing activities including transferring ownership of all affordable rental properties. As a result, the Authority, with the assistance of the City's Housing Department Staff, is responsible for carrying out housing activities and programs related to the affordable housing portfolio of the former Redevelopment Agency. (NOTE: The Authority is not designated as a public housing agency; therefore, any public housing information provided in the plan pertains to housing units that received housing assistance through the Authority. The housing assistance information provided in this plan is for the entirety of Riverside County.)

Consolidated Plan Public Contact Information

Contact person for all questions/concerns pertaining to the CDBG Program:

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Palm Desert followed its Citizen's Participation Plan to notify and encourage the public, other local government agencies, private businesses, nonprofit organizations, the Riverside County Continuum of Care (CoC), etc. to participate in the City's development of the Consolidated and Action Plans as required by 24 CRF 91.100. In addition, the City specifically mailed letters to those agencies and nonprofit organizations on the CDBG mailing list. In addition, the City of Palm Desert is an active member of the County of Riverside Continuum of Care (CoC) Board of Governance (BOG) (which includes various County departments, many nonprofit organizations, as well as other agencies) and works directly with them in relation to issues that address homelessness.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City undertook the annual process to invite and encourage individuals and representatives from a variety of public agencies, health service providers, and non profit organizations. As outlined within the Executive Summary Section, Citizen's Participation Section is the specific actions undertaken by the City to continue to invite participation and consultation with the City in regard to the CDBG Consolidated and Action Plan development. Housing Department works directly with the Housing Commission which is consists of members from the community (i.e., 2 residents of affordable housing properties and 7 members with business/professional experience). In addition, the City's Housing Department works directly with developers and housing provider to address affordable housing issues and projects within Palm Desert. In addition, the City has created a staff position focused on homelessness and mental health. The Social Services Coordinator focuses on homelessness and is developing a more proactive system of care for those experiencing homelessness and/or struggling with mental health or substance use issues. This position is a licensed therapist and has background coordinating services with housing, shelter, behavioral health and private and government agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The City of Palm Desert, Director of Special Programs is currently the Co Chair of the County of Riverside CoC Board of Governance (BOG), the Chair of the Employment and Self Sufficiency Subcommittee as well as a member of Eastern Regional Subcommittee. Each of these committees address various aspects/issues related to homelessness and services to the homeless. These committees are specifically set up to address issues related to all levels of homelessness (i.e., chronic, veterans, families,

unaccompanied youth, mental illness, substance abuse, etc.) as well as the various issues as a result of being homeless (i.e., medical care, services, housing, income and employment, etc.). As a result, the City is able to work directly with public agencies and services providers to coordinate efforts on a local and regional basis. The CoC has worked to establish the HMIS, Housing, Employment and Self Sufficiency, and Discharge Planning Subcommittees to further address specific issues that the homeless and the homeless providers face on a day to day basis. Through this coordination the

City is able to address homeless needs within our community and the region as a whole. In addition, the BOG established a Discharge Planning Committee that has worked with the Department of Corrections, Law enforcement, area Hospitals, and the Department of Mental Health to create an agreement between all parties that address discharging practices. The agreement has now been approved and ratified by all participating groups. The City's Social Services Coordinator is an active member of the CoC and coordinates directly with providers to address the needs of vulnerable populations in the city. This role also oversees contract providers serving at-risk of homelessness and unhoused individuals and families in the city.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City of Palm Desert does not receive ESG funding. However, since the City is part of the CoC BOG, it participates in the CoC ESG process for any communities/organizations receiving ESG through the County of Riverside. The CoC has a review committee that reviews data and ranks organizations that receive or have applied to receive ESG funds based on the new Tier System. Once ranking has been completed, the rankings are submitted to the BOG for review, and notices are sent to the respective organization for appeal and review of ranking. In addition, the HMIS Administrators Council was established by the COC. The Council is composed of each of the HMIS agency administrators for the providers and has the responsibility of reviewing all HMIS policies and procedures, make recommendations on HMIS programs, ensure that organizations are properly educated on the new system, and ensure adherence to the HMIS policies for the COC. The County of Riverside, Department of Public Social Services who is the CoC's Collaborative Agent is also the HMIS Lead agency and is therefore responsible for providing technical support to train organizations in HMIS system. Funding has been set aside for this purpose through the CoC and Collaborative Agent and HUD SHP grants.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	JOSLYN CENTER
	Agency/Group/Organization Type	Sustain operation for the Joslyn Wellness Center
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Affordable Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative(s) attended at least one community meeting and provided input to help prioritize the City's community needs.
2	Agency/Group/Organization	RIVERSIDE COUNTY HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing Services - Housing workforce solutions
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative(s) attended at least one community meeting and provided input to help prioritize the City's community needs.
3	Agency/Group/Organization	Desert AIDS Project, Inc.
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative(s) attended at least one community meeting and provided input to help prioritize the City's community needs.

4	Agency/Group/Organization	Neighborhood Housing Services of the Inland Empire (NHSIE)
	Agency/Group/Organization Type	Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative(s) attended at least one community forum and provided input to help prioritize the community needs of the City.
5	Agency/Group/Organization	Fair Housing Council of Riverside County, Inc.,
	Agency/Group/Organization Type	Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representative(s) attended at least one community forum and provided input to help prioritize the community needs of the City.

Identify any Agency Types not consulted and provide rationale for not consulting

No agency types were specifically left out of the consultation process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Housing Services Authority	Both address issues pertaining to homelessness and special needs housing.
Housing Element	City of Palm Desert	Both include the goal of fostering affordable housing.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City encouraged cooperation and coordination through the Citizen's Participation Plan process. The City followed the process as outlined in the Executive Summary Citizen's Participation Plan Section. In addition, the City is a member of the Coachella Valley Association of Governments (CVAG) Homeless Committee that consists of Mayors or Councilmember's of each of the nine (9) Coachella Valley communities as well as the County of Riverside, and a representative from Supervisor V. Manuel Perez's office, and Ex-officials who are representatives from organizations that serve homeless and similar client base. In addition, three of the Ex-officials are also representatives of the CoC's Eastern Region Committee that reports to the CoC BOG. Through this committee and the CoC, the City is able to work with other local government agencies and service providers to address issues on a local and regional (Coachella Valley) basis and obtain input and insight into community needs that are included within the Consolidated Plan.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

During the development of the City's Consolidated Plan, it made several efforts to promote community involvement and input. These included the Housing and Community Development Needs survey. This survey was available online. The City held a Public Input Meeting on February 16, 2023, and a public review meeting was also held.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Survey Outreach	Non-targeted/broad community	To date, there have been 209 responses to the 2023 Housing and Community Development Needs Survey.	Comments from the survey are included throughout the document.	All comments were accepted.	
2	Public Meeting	Non-targeted/broad community	The public input meeting was held on February 16, 2023.	A complete set of notes and the sign-in sheet is included as an attachment.	All comments were accepted	
3	Public Meeting	Non-targeted/broad community	Hybrid meeting held on May 30, 2023	No comments received	No comments received were received	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Meeting	Non-targeted/broad community	The public hearing was held on June 22, 2023	No comments received	No comments received were received.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City of Palm Desert is located in the Coachella Valley in eastern Riverside County. Riverside County grew from 1,545,387 in 2000 to 2,189,641 in 2010. By 2018, the American Community Survey estimated that the County population had grown to 2,383,286, which represents an 8-year increase of 8.8%. The California Department of Finance (DOF) estimated that, in January 2020, Riverside County had a population of 2,442,304, an increase of 11.5% over the 2010 population.

Palm Desert has also experienced a rapid rate of growth. In 1990, the Census reported a population of 23,252 in the City. From 1990-2000, the City's population grew to 41,155, an increase of 77% in ten years. By 2010, the Census reported a City population of 48,445, an increase of 17.3% in ten years. The California Department of Finance estimated that the City's population on January 1, 2020, was 52,986, an average annual increase of under 1%. Between 2010 and 2018, the City's growth rate (7.6%) ranked in the middle compared to other Coachella Valley cities and was less than the County's growth rate (8.8%).

The City had a total of 23,117 households in 2010. The average household size was 2.09 persons per household based on the 2010 Census. Between 2010 and 2018, the number of households increased 4.3% to 24,114, and the average household size in 2018 was 2.15 persons according to the ACS. In 2018, 44.9% of households consisted of married couple families, followed by nonfamily households (43.3%), female householder families (7.6%), and male householder families (4.3%).

Median household income in the City in 2000 was \$48,316; it rose to \$50,267 by 2010. In 2018, median household income had risen to \$57,578, less than the County median income, which stood at \$66,964. The following table identifies the number of Palm Desert households in each income range.

The Great Recession, with onset in late 2007, saw high unemployment and job losses in the Coachella Valley. At the trough, about every seventh person lost their job. Regional employment started to increase in 2011, but annual growth was still slower than pre-Recession levels until 2017, suggesting more severe impacts than western Riverside County, the state, and the nation. The construction sector was hit hardest regionally, with approximately 70% of jobs lost and only 14% recovered by December 2017. The Retail Trade and Wholesale Trade sector lost around 6,700 jobs but has generally returned to pre-Recession levels. Two sectors have fully recovered and even added jobs: Education and Health Services and, to a lesser extent, Leisure and Hospitality. Between 2010 and 2019, annual unemployment rates in Palm Desert declined from a high of 10.1% in 2010 to a low of 4.2% in 2019. However, analysis of employment data from 2005 to 2017 shows that, as of December 2017, Palm Desert had not

recovered the job losses it incurred during the Great Recession. The City lost about 20% of jobs, relative to peak employment, and had recovered only about 1.8%.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The population has grown slightly since the last Consolidated Plan, increasing by 3% since 2009. However, the number of households has remained steady despite the uptick in population. This could point to household size increasing since the last plan. Additionally, the median income rose slightly to \$56,262, an increase of 4%.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	50,199	51,675	3%
Households	23,860	23,975	0%
Median Income	\$53,938.00	\$56,262.00	4%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,875	2,145	4,220	1,890	12,840
Small Family Households	595	405	950	475	3,760
Large Family Households	130	50	295	85	460
Household contains at least one person 62-74 years of age	695	550	1,230	415	4,370
Household contains at least one person age 75 or older	755	820	1,205	550	2,425
Households with one or more children 6 years old or younger	305	145	384	109	880

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	60	25	100	15	200	15	10	4	0	29
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	15	130	20	220	35	0	25	0	60
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	110	40	200	25	375	0	0	55	0	55
Housing cost burden greater than 50% of income (and none of the above problems)	1,035	625	380	65	2,105	890	480	675	240	2,285
Housing cost burden greater than 30% of income (and none of the above problems)	80	240	810	350	1,480	125	305	475	185	1,090

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	135	0	0	0	135	205	0	0	0	205

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,260	705	810	130	2,905	940	490	760	240	2,430
Having none of four housing problems	160	350	1,350	730	2,590	170	605	1,295	790	2,860
Household has negative income, but none of the other housing problems	135	0	0	0	135	205	0	0	0	205

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	415	290	480	1,185	115	60	70	245
Large Related	115	4	125	244	15	0	54	69
Elderly	500	395	310	1,205	695	640	970	2,305
Other	290	220	415	925	245	95	95	435

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	1,320	909	1,330	3,559	1,070	795	1,189	3,054

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	415	170	65	650	90	35	55	180
Large Related	115	4	25	144	0	0	4	4
Elderly	460	340	170	970	680	390	565	1,635
Other	215	130	120	465	160	65	50	275
Total need by income	1,205	644	380	2,229	930	490	674	2,094

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	165	40	250	40	495	50	0	80	0	130
Multiple, unrelated family households	0	0	0	4	4	0	0	0	0	0
Other, non-family households	0	15	80	0	95	0	0	0	0	0
Total need by income	165	55	330	44	594	50	0	80	0	130

Table 11 – Crowding Information – 1/2

Data 2013-2017 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source

Comments:

Describe the number and type of single person households in need of housing assistance.

Overall, there are 8,765 single person households in Palm Desert. This represents a 2% increase in this type of household since 2010 when there were 8,617 single person households. For this household type, single persons make up 37% of all households in the City. For single person households, 5,048 are owners. Overall, single owners make up 34% of all owner households in Palm Desert. Additionally, 3,717 are renters which makes up 40% of all renters in the City. Also, 931 single person households do not have a vehicle, highlighting mobility needs for this population. Single person households that make less than 30% of AMI are in the greatest need of housing assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Those that are disabled require housing considerations for their needs. This can require units to be accessible or navigable in ways that are different than standard units. This is particularly present for Palm Desert due to a large and growing population of disabled people. Data shows there are 7,701 disabled persons in the City for 2017. This represents 15% of the population. Additionally, the number has increased 13% in just five years, jumping from 6,787 in 2012. When it comes to specific disability types, the two most common in the City are Ambulatory Disability (3,673 individuals) and Hearing Disability (3,112 individuals).

There is a lack of data for Palm Desert on the number of individuals in this group as it pertains to victims of domestic violence or victims of human trafficking. The Point in Time count report did not specify numbers for these populations, and there is no information on housing options for these populations within the County Housing Inventory Count. However, there are State databases for supportive services in place for individuals in these circumstances. For example, The National Network for Ending Domestic Violence publishes annual reports by State for counts of domestic violence victims and cases. The 2021 Annual report found that across the State, 4,533 victims are served each day. However, there were still 1,071 unmet requests for services across the State in 2021. Consultation backed up the need for additional services for these populations.

What are the most common housing problems?

The most common housing problem by far is housing cost burden. According to CHAS data, 9,410 households in the City experience some type of housing cost burden which represents 39% of all households in the entire City. When broken down into severe cost burden, this still remains a major issue. In fact, there are more households experiencing severe cost burden than standard cost burden. In the City there are 4,970 households paying 50% or more of income on housing costs. The population paying 30-50% on housing costs is only 4,440 households. Therefore, cost burden and severe cost burden is a major problem for the City.

Are any populations/household types more affected than others by these problems?

Housing cost burdens affect renters at a higher rate than owners. CHAS data shows that 47% of all renter households experience cost burden compared to only 35% of all owner households. This rate for renters of 47% is higher than the Citywide rate of 39%, while the rate for owners is below the City average. The same trend remains true for households experiencing severe cost burden. For this type of cost burden, 25% of all renters experience the issue while only 18% of all owners experience the issue.

Most strikingly, the issue effects households that are low-to-moderate income (0-80% AMI) at a much higher rate than other households. There are 9,240 LMI households in Palm Desert and 6,610 experience a cost burden which is a rate of 72%. When broken down into tiers, it is even more pronounced. Extremely low-income households (0-30% AMI) are cost burdened at a rate of 83%, and very low-income households (30-50%) are cost burdened at a rate of 79%. Low-income households (50-80% AMI) experience a cost burden at a rate of 60%, which is much higher than the Citywide rate of 39%.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The top housing problem for low-income individuals and families with children is housing cost burden. There is an overall need of affordable housing options for these populations. In the City, there are 2,875 households in the extremely low-income category. Of this group, 2,380 (83%) experience cost burden and 2,130 (74%) experience severe cost burden.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

There are multiple factors that may contribute to an increased risk of homelessness. These include large households or households that are overcrowded from families doubling up, or large families that can only afford smaller housing units. Also, a major issue is housing cost burden. Families that experience a cost burden are considered to be at risk of becoming homeless. If cost burden is paired with another housing problem, then the risk is exacerbated. Other characteristics include elderly households with fixed incomes, single female-headed households, and households with persons experiencing a disability.

Discussion

This section outlines some major housing issues in the City, especially housing cost burden. This is a primary concern for lower income households since they experience housing cost burden at a much higher rate than other households. Additionally, there is stress on the rental housing market for individuals or households that cannot afford to buy a home. Renter households experience cost burdens at a higher rate than homeowners.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,405	130	340
White	1,595	105	310
Black / African American	15	0	0
Asian	130	15	30
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	575	10	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,740	410	0
White	1,380	305	0
Black / African American	60	0	0
Asian	60	15	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	240	85	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,855	1,365	0
White	1,825	910	0
Black / African American	40	0	0
Asian	95	65	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	785	350	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	910	985	0
White	655	760	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	25	10	0
Asian	45	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	135	185	0

Table 16 - Disproportionately Greater Need 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Disproportionately greater need is defined as any group that experiences housing problems at a rate that is 10% higher than the jurisdiction as a whole. Data shows that the following groups experience disproportionately greater need when it comes to housing problems in Palm Desert:

- Extremely Low-Income (0-30% AMI)
- Jurisdiction as a whole: 84%Black/African American Households: 100%Hispanic Households: 98%
- Very Low-Income (30-50% AMI)
- Jurisdiction as whole: 81%Black/African American Households: 100%
- Low-Income Households (50-80% AMI)
- Jurisdiction as a whole: 68%Black/African American Households: 100%
- Moderate-Income Households (80-100%)
- Jurisdiction as a whole: 48%Black/African American Households: 71%Asian Households: 82%

Overall, Black/African American Households experience a disproportionately greater need across all income levels shown above. In fact, when it comes to LMI Black/African American households (0-80%), 100% face at least one housing problem. There are 115 households in this category for Palm Desert, and all 115 have a housing problem. While this sample size may be low, this rate is alarmingly high.

For the other groups experiencing a disproportionately greater need, Hispanic households making 0-30% AMI experience a housing problem at a high rate of 98%. This includes 575 of the 585 households in this category. Also, Asian households making 80-100% AMI experience a housing problem at a rate of 82% while the jurisdiction rate is only 48%. This includes 45 of the 55 households in the category.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,200	330	340
White	1,490	210	310
Black / African American	0	15	0
Asian	130	15	30
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	495	95	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,195	955	0
White	940	740	0
Black / African American	50	10	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	60	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	135	185	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,570	2,645	0
White	980	1,745	0
Black / African American	40	0	0
Asian	25	135	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	450	685	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	370	1,520	0
White	290	1,125	0
Black / African American	10	25	0
Asian	20	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	50	275	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Disproportionately greater need is defined as any group that experiences severe housing problems at a rate that is 10% higher than the jurisdiction as a whole. Data shows that the following groups experience disproportionately greater need when it comes to severe housing problems in Palm Desert:

- Very Low-Income (30-50% AMI)
- Jurisdiction as whole: 56%Black/African American Households: 83%Asian Households: 80%
- Low-Income Households (50-80% AMI)
- Jurisdiction as a whole: 37%Black/African American Households: 100%
- Moderate-Income Households (80-100%)
- Jurisdiction as a whole: 20%Asian Households: 36%

Overall, Black/African American Households and Asian Households each experience a disproportionately greater need across two income levels shown above.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Disproportionately greater need is defined as any group that experiences cost burden at a rate 10% higher than the jurisdiction as a whole. According to CHAS data above, there is only one group with a disproportionately greater need of housing cost burden: Pacific Islander households experience a 30-50% cost burden at a clip of 100% compared to the jurisdiction wide rate of 19%. However, this sample is small as there are only 4 Pacific Islander households in the entire City.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	14,210	4,450	4,970	355
White	10,750	3,200	3,860	325
Black / African American	210	85	60	0
Asian	460	130	215	30
American Indian, Alaska Native	4	0	0	0
Pacific Islander	0	4	0	0
Hispanic	2,440	880	695	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

Disproportionately greater need is defined as any group that experiences cost burden at a rate 10% higher than the jurisdiction as a whole. According to CHAS data above, there is only one group with a disproportionately greater need of housing cost burden: Pacific Islander households experience a 30-50% cost burden at a clip of 100% compared to the jurisdiction wide rate of 19%. However, this sample is small as there are only 4 Pacific Islander households in the entire City.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Disproportionately greater need is defined as any group that experiences housing problems at a rate that is 10% higher than the jurisdiction as a whole. Data shows that the following groups experience disproportionately greater need when it comes to housing problems in Palm Desert:

- Extremely Low-Income (0-30% AMI)
 - Jurisdiction as a whole: 84%Black/African American Households: 100%Hispanic Households: 98%
- Very Low-Income (30-50% AMI)
 - Jurisdiction as whole: 81%Black/African American Households: 100%
- Low-Income Households (50-80% AMI)
 - Jurisdiction as a whole: 68%Black/African American Households: 100%
- Moderate-Income Households (80-100%)
 - Jurisdiction as a whole: 48%Black/African American Households: 71%Asian Households: 82%

Overall, Black/African American Households experience a disproportionately greater need across all income levels shown above. In fact, when it comes to LMI Black/African American households (0-80%), 100% face at least one housing problem. There are 115 households in this category for Palm Desert, and all 115 have a housing problem. While this sample size may be low, this rate is alarmingly high.

For the other groups experiencing a disproportionately greater need, Hispanic households making 0-30% AMI experience a housing problem at a high rate of 98%. This includes 575 of the 585 households in this category. Also, Asian households making 80-100% AMI experience a housing problem at a rate of 82% while the jurisdiction rate is only 48%. This includes 45 of the 55 households in the category.

Disproportionately greater need is defined as any group that experiences severe housing problems at a rate that is 10% higher than the jurisdiction as a whole. Data shows that the following groups experience disproportionately greater need when it comes to severe housing problems in Palm Desert:

- Very Low-Income (30-50% AMI)
 - Jurisdiction as whole: 56%Black/African American Households: 83%Asian Households: 80%

- Low-Income Households (50-80% AMI)
- Jurisdiction as a whole: 37%Black/African American Households: 100%
- Moderate-Income Households (80-100%)
- Jurisdiction as a whole: 20%Asian Households: 36%

Overall, Black/African American Households and Asian Households each experience a disproportionately greater need across two income levels shown above.

Disproportionately greater need is defined as any group that experiences cost burden at a rate 10% higher than the jurisdiction as a whole. According to CHAS data above, there is only one group with a disproportionately greater need of housing cost burden: Pacific Islander Households experience a 30-50% cost burden at a clip of 100% compared to the jurisdiction wide rate of 19%. However, this sample is small as there are only 4 Pacific Islander households in the entire City.

If they have needs not identified above, what are those needs?

No other needs identified

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Hispanic households are predominantly located in the center of the City. More specifically, the only census tract that is not predominantly White is census tract 451.08 which is predominantly Hispanic.

NA-35 Public Housing – 91.205(b)

Introduction

The Palm Desert Housing Authority (Authority) is not designated as a Public Housing Authority. The Housing Authority of the County of Riverside administers federally funded programs (i.e., Section 8, Public Housing, etc.) including households seeking housing assistance through federal programs within the City of Palm Desert. The Authority administers its own affordable housing and assistance programs but does not provide vouchers. Authority prospective applicants and tenants needs for accessible units vary from fully accessible units to individual accommodations. Authority prospective applicants and tenants may require affordable housing with convenient access to public transportation and health care services, as well as structural adaptations to accommodate wheelchairs and other assistive devices.

The information provided in the below tables is based on the County of Riverside Public Housing Authority as the City is not designated as a Public Housing Authority.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	79	456	8,748	36	8,364	135	178	19

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	12,664	13,261	13,870	10,805	13,850	13,465	14,983
Average length of stay	0	6	4	6	2	6	0	5
Average Household size	0	1	3	2	1	2	1	3
# Homeless at admission	0	2	331	205	1	197	2	5
# of Elderly Program Participants (>62)	0	67	38	3,249	9	3,211	15	10
# of Disabled Families	0	12	70	2,587	26	2,422	82	33
# of Families requesting accessibility features	0	79	456	8,748	36	8,364	135	178
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	66	318	5,469	26	5,195	79	144	15
Black/African American	0	10	126	2,967	8	2,867	55	29	3
Asian	0	1	9	209	2	203	0	2	1
American Indian/Alaska Native	0	0	2	80	0	76	1	3	0
Pacific Islander	0	2	1	23	0	23	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	29	250	2,318	7	2,220	13	74	1
Not Hispanic	0	50	206	6,430	29	6,144	122	104	18
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Housing Authority of the County of Riverside administers federally funded programs (i.e., Section 8, Public Housing, etc.) including households seeking housing assistance through federal programs within the City of Palm Desert. Authority prospective applicants and tenants needs for accessible units vary from fully accessible units to individual accommodations. Authority prospective applicants and tenants may require affordable housing with convenient access to public transportation and health care services, as well as structural adaptations to accommodate wheelchairs and other assistive devices. Housing needs can include independent home environments, homes with special modifications and design features and live in care options.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The waitlist for the County remains full. Currently, the website states there are 137,000 families on the waiting list which shows the major need in the area, including the City. The site also states that the authority has the resources to assist only 10,000 families currently. Below are the waiting list preferences:

The Housing Authority (HA) has implemented the following preferences for selecting names from the waiting list. In accordance with California State Law, at each level of preferences, veterans and/or active-duty servicemen and their spouse or widow/er will have priority. The Housing Authority will release families to result in a lease up of:

- *For the Section 8 Program: 75% of the families will be at or below 30% of the median income (extremely low income), and 25% of the families will be between 30% and 50% of the median income (very low income).*

The release will be in accordance with Federal Regulations. A family must meet both of the characteristics of a "Level of Preference". If the First Level of Preference releases do not satisfy the regulations regarding extremely low-income families, releases will be done at the second Level of Preference and then to the Third Level of Preference until the 75% extremely low-income requirement is met.

First Level of Preference

County of Riverside Residency Preference, and

1. *Qualified veterans, or*
2. *Elderly family who is homeless and is referred by Adult Protective Services (APD), a division within the County of Riverside department of Public Social Services, or*
3. *Families or Foster Care Youth referred to the HA by the Riverside County Public Child Welfare Agency (PCWA) for admission through the Family Unification Program (HUD designated special purpose vouchers), or*
4. *Participants who have utilized a special rental assistance program administered by (or under contract/Memorandum of Understanding (MOU) with) the Housing Authority of the County of Riverside for a minimum of a six (6) month term and no longer require supportive services; or*
5. *Participants transitioning or "moving up" who have been assisted through a Permanent Supportive Housing Program administered by a partnering agency and no longer require intensive supportive services; or*
6. *Non-elderly persons at least 18 years of age and less than 62 years of age with disabilities who are transitioning out of institutional and other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless, or*
7. *Families whose head of household, spouse or co-head are receiving temporary emergency shelter services through the County's Project RoomKey program effective March 20,2020 and are 65 years and older or were pregnant at the time of admission to Project RoomKey.*

Second Level of Preference

County of Riverside Residency Preference, and

1. *Families with minors or Elderly Families or Disabled Families*

*To meet the **Riverside Residency preference**, a family must live or work in Riverside County.*

How do these needs compare to the housing needs of the population at large

The needs are comparable to the population at large in that the sheer number of families assisted and on the waiting list indicates major needs for housing assistance across all populations. This includes LMI families, persons with disabilities, and veterans.

Discussion

See above.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Palm Desert is a part of the Riverside County Continuum of Care. The 2022 count found that there were 29 unsheltered homeless persons, including children in Palm Desert. There are 11 unsheltered persons in households with only children. There are 1,940 adults only in households. The chronically homeless make up 560 that are unsheltered. There are 77 homeless veterans unsheltered. A total of 11 are unaccompanied children. There is a total of 1,667 sheltered homeless in the City consisting of Adults with children, adults only with no children, adults, chronically homeless individuals, chronically homeless families, Veterans, and unaccompanied children. The table below will present information from the Riverside County CoC 2022 Point in Time count taken in the City of Palm Desert.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	29	461	0	0	0	0
Persons in Households with Only Children	11	19	0	0	0	0
Persons in Households with Only Adults	1,940	856	0	0	0	0
Chronically Homeless Individuals	560	256	0	0	0	0
Chronically Homeless Families	0	7	0	0	0	0
Veterans	77	49	0	0	0	0
Unaccompanied Child	11	19	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

There were 490 homeless individuals in family households containing both adults and children. For this group, 461 of the individuals were sheltered, while 9 families comprising 29 individuals were not unsheltered. Additionally, there were 126 homeless veterans counted throughout the entire county. For this population, most are unsheltered (77) compared to sheltered (49).

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The Riverside County Point in Time Count for the year 2022 only provided demographic data for the unsheltered population and not the sheltered population. Overall, the results for the unsheltered population are as follows:

- Race
- 54% White13% Black/African American10% Multiple Races3% American Indian or Alaska Native1% Asian1% Pacific Islander
- Ethnicity
- 30% Hispanic24% Not Hispanic47% Unknown

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Overall, the County saw 3,316 homeless persons in 2022. This includes 1,980 unsheltered (60%) and 1,336 sheltered (40%). This represents an 8% decrease in unsheltered homeless for the County since 2020. For the City, all 26 homeless persons were unsheltered.

Discussion:

Overall, the homeless population has risen since 2020. However, the increase is largely due to a massive rise in sheltered individuals. This total for sheltered individuals has increased 83% since 2020, while the unsheltered population has decreased 8% since 2020.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Describe the characteristics of special needs populations in your community:

Elderly and Frail Elderly Persons

In total, the elderly population (65+) represents one third (33%) of the City's overall population. This is much higher than the State average of 15%. There are 17,033 elderly individuals in this group. In fact, the City's population of individuals 75+ years of age (8,406; 16% of population) is larger than the State average of 65+ individuals. Finally, individuals that are at least 85 years of age represent 5% of the City population.

People with Disabilities (Mental, Physical, Developmental)

An estimated 7,701 percent of the population was disabled in 2017. Overall, 59% of these individuals were 65 years of age or older. The most common disability types are as follows:

- Hearing: 3,112
- Vision: 1,532
- Cognitive: 2,298
- Ambulatory: 3,673
- Self-Care: 1,369
- Independent Living: 2,448

People with Alcohol or other Drug Addictions

In February 2018, the Riverside University Health System – Public Health Epidemiology and Program Evaluation reported on Overdose and Opioid Deaths in Riverside County. The report found that drug overdoses increased 51.8 percent between 2006 and 2015.4 Deaths involving opioid-related overdoses rose 10 percent between 2011 and 2015, and heroin related deaths rose by 80 percent during that same time period. There has not been an updated report since 2018.

However, in 2022 data was published for alcohol related deaths. It was found that on average 534 alcohol related deaths occurred in the County each year from 2010 to 2020. Overall, alcohol-related mortality increased by 91% since 2010.

Victims of Domestic Violence

Pinpointing specific numbers of domestic violence victims is difficult due to the lack of reporting and other mitigating factors. Shelter from the Storm, a local Domestic Violence shelter, cited that nearly a quarter of American women report being survivors of domestic violence. Additionally, there is a lack of data for Palm Desert on the number of individuals in this group as it pertains to victims of domestic violence or victims of human trafficking. The Point in Time count report did not specify numbers for these populations, and there is no information on housing options for these populations within the County Housing Inventory Count. However, there are State databases for supportive services in place for individuals in these circumstances. For example, The National Network for Ending Domestic Violence publishes annual reports by State for counts of domestic violence victims and cases. The 2021 Annual report found that across the State, 4,533 victims are served across the state each day. However, there were still 1,071 unmet requests for services across the State in 2021. Consultation backed up the need for additional services for these populations.

What are the housing and supportive service needs of these populations and how are these needs determined?

The top housing and supportive service needs were determined by data analysis and the results of the Palm Desert Community Outreach Survey for the 2023-2028 Consolidated Plan

The top five needs for each category are:

- Housing Needs

- Affordable Rental Housing (65% of survey respondents)Senior Housing (49%)Energy Efficiency Improvements (46%)Down Payment Assistance (23%)Supportive Housing (22%)
- Supportive Service Needs
- Homeless Services (38%)Senior Services (37%)Services for Very Low-Income Families (32%)Transportation Services (31%)Youth Services (30%)

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Riverside County Epidemiology Report for 2021 stated that there were 10,782 individuals with HIV in the County. This represented a rate of 435.1 cases per 100,000 people. This is an increase from 422.0 in the year 2020. Additionally, rates are higher in the County than the State overall. The State's rate in 2021 was only 348.1 per 100,000.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Palm Desert's top five needs for Public or Community Facilities are:

1. Parks and Recreation Facilities
2. Youth Centers
3. Neighborhood Facilities
4. Senior Centers
5. Child Care Centers

How were these needs determined?

These needs were determined by the Palm Desert Community Outreach Survey for the 2023-2028 Consolidated Plan.

Describe the jurisdiction's need for Public Improvements:

Palm Desert's top five needs for Public Infrastructure Improvements are:

1. Passenger Rail Station
2. Street Lighting Improvements
3. Street Improvements
4. Sidewalk Improvements
5. Increased Code Enforcement

How were these needs determined?

These needs were determined by the Palm Desert Community Outreach Survey for the 2023-2028 Consolidated Plan.

Describe the jurisdiction's need for Public Services:

Palm Desert's top five needs for Public Services are:

1. Support for Affordable Housing
2. After School Programs or Summer Day Camps for Children
3. Services and Shelter for Homeless Population

4. Programs for At-Risk Youth
5. Neighborhood Crime Prevention

How were these needs determined?

These needs were determined by the Palm Desert Community Outreach Survey for the 2023-2028 Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The number of housing units in Palm Desert increased by 7.9 percent between 2010 and 2017. Meanwhile, housing costs have continued to rise for renters. However, they have significantly decreased for homeowners. Single family home valuations have decreased significantly since 2010 to \$328,300. In addition, the number of vacant units have continued to be extreme in the City.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

For 2017 ACS Data, there are 39,800 housing units in the City. However, only 23,978 are occupied. This means about 40% of the housing stock is considered vacant. This points the nature of Palm Desert being a seasonal attraction for families.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,330	41%
1-unit, attached structure	8,010	20%
2-4 units	5,415	14%
5-19 units	4,240	11%
20 or more units	2,775	7%
Mobile Home, boat, RV, van, etc	3,030	8%
Total	39,800	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	120	1%	525	6%
1 bedroom	190	1%	2,550	27%
2 bedrooms	5,500	37%	4,350	47%
3 or more bedrooms	8,870	60%	1,865	20%
Total	14,680	99%	9,290	100%

Table 28 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

There is a lack of smaller housing options in the City. These options can be helpful to lower housing costs since smaller units are generally more affordable. Additionally, the City has many single elderly households and household size is small for the City (average: 2.14). Therefore, more smaller units can help create more achievable housing that fits the population.

There are 10,110 households or units that have at least one housing problem associated with them. This could mean unaffordability, overcrowding, or inadequate facilities. This is about 42% of all households in

the City. These at-need households will be targeted by the City's CDBG funds to create suitable living environments and promote affordable housing.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

No Section 8 contracts exist within the City of Palm Desert, only individual voucher assistance. No units are expected to be lost

Does the availability of housing units meet the needs of the population?

As seen in the Needs Assessment section, as well as information gathered from public input, current housing does not meet the needs of the population. This is seen most markedly in the rate of cost burdens in the City. In 2017, an estimated 39 percent of the population was cost burdened. Renters and low-income households are more likely to be impacted by cost burdens and are therefore most likely to not have housing units that meet their needs. There are extremely high rates of cost burden for LMI households, including severe cost burden. These numbers make it clear that the available housing units do not meet the affordability needs of the population.

Describe the need for specific types of housing:

The highest rated needs for housing include affordable rental housing, senior housing, energy efficiency improvements, down payment assistance, and supportive housing. The emphasis on the need for more affordable and senior friendly housing reflects the findings in the Needs Assessment that found the high rate of cost burden for renter households, as well the large senior population in the City.

Discussion

About 40% of the City's housing stock is considered to be vacant. This amount of units compared to actual population has lowered the demand for home ownership and decreased home values. Conversely, rental costs are up across all levels, and affordability is hard to find for all LMI groups.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	394,800	328,300	(17%)
Median Contract Rent	953	1,077	13%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	885	9.5%
\$500-999	3,185	34.3%
\$1,000-1,499	3,605	38.8%
\$1,500-1,999	1,080	11.6%
\$2,000 or more	545	5.9%
Total	9,300	100.1%

Table 30 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	270	No Data
50% HAMFI	670	430
80% HAMFI	3,165	1,360
100% HAMFI	No Data	2,074
Total	4,105	3,864

Table 31 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,062	1,202	1,509	2,065	2,542
High HOME Rent	981	1,053	1,266	1,454	1,603

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Low HOME Rent	770	825	990	1,144	1,276

Table 32 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

As shown by the housing needs and cost burden sections in the Needs Assessment, a large portion of the population faces housing challenges. LMI Households are particularly prone to these issues. For example, 83% of extremely low-income households face a housing cost burden. Additionally, this section provides data on unit affordability. The housing affordability table shows there are only 270 affordable rental units for the population making 0-30% AMI despite there being 2,875 households in this bracket. Similarly, the table shows there are only 1,100 units affordable to those making 30-50% AMI despite there being 2,145 households in this group. For these two brackets alone, that means there is a shortage of 3,650 affordable units.

How is affordability of housing likely to change considering changes to home values and/or rents?

Palm Desert has seen an increase in rental costs of 13% since 2009. Additionally, rental cost burden is higher than owner cost burden. If trends continue, rental affordability will continue to be a priority for the City. This is also a priority of the community, as it was listed as the top housing need. Interestingly, the median home value has substantially decreased since 2009. In previous years, it had risen. However, if rents continue to become untenable, then the homeownership market may pick back up as an alternative.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Fair Market Rent (FMR) and HOME rents may not be sufficient to meet the housing needs of households in Palm Desert. These rates will still be difficult to achieve for many LMI families. This may be especially true for larger families that require larger units. This only increases the need to produce more affordable housing.

Discussion

The cost of rental housing has continued to rise in Palm Desert, leaving many low to moderate income households without suitable housing options. This is reflected in the proportion of lower income households facing cost burdens and other housing problems. If prices continue to rise at the rate they have been, the City will see more households in need of affordable housing options. While home values are decreasing, they are still unattainable for many LMI families.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section of the ConPlan discusses existing housing supply, age and condition of housing, the number of vacant and abandoned units, and the risk posed by lead-based paint.

The following section describes the conditions of the housing stock in the City. HUD defines housing “conditions” similarly to the definition of housing problems discussed in the Needs Assessment. These conditions are:

1. More than one person per room;
2. Cost burden greater than 30 percent;
3. Lack of complete plumbing; and
4. Lack of complete kitchen facilities.

Definitions

Units that are classified as substandard condition are in poor condition and do not meet all state and local codes. Units that are substandard condition but are suitable for rehabilitation are both structurally and financially feasible to rehabilitate. Standard condition is a unit that meets all state and local codes.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,130	35%	4,405	47%
With two selected Conditions	95	1%	455	5%
With three selected Conditions	25	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	9,435	64%	4,430	48%
Total	14,685	100%	9,290	100%

Table 33 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,185	15%	1,545	17%
1980-1999	7,295	50%	4,035	43%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
1950-1979	5,030	34%	3,565	38%
Before 1950	165	1%	140	2%
Total	14,675	100%	9,285	100%

Table 34 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	5,195	35%	3,705	40%
Housing Units build before 1980 with children present	1,169	8%	344	4%

Table 35 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

As shown in both the Condition of Units Table and the Year Unit Built table, there is some need for rehabilitation of both owner and renter households in the City. For example, 35% of owner units and 47% of renter units have at least one selected condition that may require attention. Additionally, there is a chunk of older units in the City's housing stock that may demand some updates. This includes 35% of owner-occupied units and 40% of renter occupied units.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

According to the risk of lead-based paint hazard table, there are 1,513 units with children in the City that were built before 1980. Units built before 1980 may contain lead-based paint and may require some updates.

Discussion

Housing conditions can be improved for about 35-45% of housing units in the City according to data above.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	77	469	8,681	48	8,633	819	1,759	342
# of accessible units			2						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Palm Desert Housing Authority (Authority) is not a Public Housing Authority. The Housing Authority of the County of Riverside administers federally funded programs (i.e., Section 8, Public Housing, etc.) including households seeking housing assistance through federal programs within the City of Palm Desert.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Not applicable.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Not applicable.

Discussion:

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	592	0	157	463	0
Households with Only Adults	767	40	83	1,043	0
Chronically Homeless Households	0	0	0	821	0
Veterans	14	0	25	824	0
Unaccompanied Youth	40	0	25	148	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Riverside County Continuum of Care uses streamlined benefits application system featuring a single application process for multiple programs in order to expedite enrollment and access to available resources for homeless and at risk to homeless individuals and families. The CoC has a subcommittee related to identifying and coordinating employment and related resources for homeless people and that case managers ensure that homeless people and especially chronically homeless people are accessing benefit programs such as: Food Stamps (CalFresh), MediCal, CalWORKs, mental health services, Social Security Disability Income (SSDI), Supplemental Security Income (SSI) and Veteran's benefits.

Accessing mainstream services and benefits also includes assisting them in gathering the necessary documentation to apply/receive benefits and ensuring they have adequate transportation to get to appointments, job locations, etc. Whether or not a homeless person is receiving these benefits is reported in HMIS and tracked in an Annual Performance Review as a performance measure that is used to rate and rank each homeless program within the CoC.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The County of Riverside Department of Public Social Services, Homeless Unit and CoC Collaborative Agent's Housing Inventory Chart is attached that outlines the services facilities. Based on the Housing Inventory Chart it is apparent that there are service providers that have been established and create a well-rounded approach to addressing the needs of homeless, those at risk of becoming homeless, those with special needs, etc. Through the combined efforts of the services providers, the County of Riverside, and Continuum of Care there exists a coordinated effort to meet the specific needs and tracking of services taking place for targeted groups. The list reflects the organization name, type of beds, number of beds, who service(s) are provided to, etc. In addition, many of these providers also offer needed support services (e.g., food, counseling, health, job training, etc.) or partner with such agencies as the County of Riverside Department of Mental Health or Department of Public Social Services and even other non-profit organizations to provide services to clients that they may need and are not offered through their organizations. Many providers are now working together to develop a more coordinated approach to providing services and assisting those in need. The City also contracts with the County of Riverside to provide street outreach services working in coordination with city departments to engage those experiencing homelessness in the city and link them to shelter, housing and supportive services.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

There are a variety of services available in the community for special needs populations, including at risk youth, seniors, substance abuse, and persons with disabilities.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Supportive housing is needed by several populations:

Elderly persons (including the frail elderly) and persons with physical or developmental disabilities need in-home supportive services, often with tasks related to daily living, such as cleaning and meal preparation.

According to the 2017 ACS, around 15 percent of Palm Desert's population has some sort of disability. Existing housing for people in this category may require modifications to make it suitable, with improvements such as accessible toilets, grab bars, walk-in showers, and walk-in tubs. In addition to difficulties finding housing that meets their needs, this population can also face discrimination based on their disabilities.

Foster youth aging out of the foster system need life skills training, job training, and educational programs.

Persons with HIV/AIDS sometimes face bias and misunderstanding about their illness, which may affect their access to housing. Proper enforcement of fair housing regulations should be followed.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Through the CoC Discharge Planning Committee, the CoC was able to form an agreement with various agencies to provide coordinate efforts to ensure that persons facing homelessness after leaving institutional care are transported to an appropriate facility possessing the supportive services required and with prior approval and knowledge of the organization. The Cooperative Agreement approved in December 2011 was entered into by and between the County of Riverside Department of Public Social Services, County Department of Mental, Hospital Association of Southern California, Riverside County

Sheriff's Department, Riverside County Veterans' Services, and Community Connect of Riverside County for the establishment of a collaborative that will support and participate in the Riverside County

Continuum of Care Coalition Discharge Planning Committee efforts to establish a coordinated and collaborative discharge planning system to individuals leaving institutional care.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

See below.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

During the 2023 Program Year, the City of Palm Desert plans to undertake several projects that will address the supportive service needs of special needs populations. These include a healthy lifestyles outreach program for seniors and food program, and initiatives to support accessible housing. All of these projects will help promote the City's goal to provide support for public service programs.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City's Housing Element for the years 2021-2029 outlines some barriers to affordable housing for the region.

Governmental Constraints

Palm Desert provides expeditious processing for planning entitlements. The city encourages the concurrent processing of applications and can complete the process on most projects in 3 to 6 months, depending on the approving body and complexity of the application. The City requires tract map review, approval for all single-family home tracts and a precise plan for multi-family projects, both can be processed concurrently with any other permit. For either, the review process is a simple analysis that assures that the project's design meets the requirements of the zone in which it occurs. Applications are circulated to other City departments for comments. The Precise Plan is then reviewed by the Architectural Review Commission (ARC) and approved by the Planning Commission. The ARC provides technical review, including parking, trash enclosures and similar standards, and landscaping plans for water efficiency. The ARC meetings are public, ARC review is scheduled within 2 to 3 weeks of an application being found complete, and precedes Planning Commission hearing by 4 weeks. Public notice and mailings are made 10 days prior to a Planning Commission hearing. The findings needed for approval of either a tract map or precise plan pertain to the project's consistency with the General Plan and Zoning Ordinance; public health and safety; the site's physical ability to accommodate the project. The findings are not subjective and do not pose a constraint to development. The average processing time for a typical application is 4 to 6 months, the recently approved Montage single family homes, which received approval in 6 months, which is consistent with most Valley cities, and does not represent a constraint. The City has a building permit streamlining process, for a fee, and allows "at risk" building permit applications, which can be submitted immediately following ARC review, and prior to Planning Commission approval. The city has not received any requests for streamlined processing under SB 35, and to date has relied on the requirements of law should an SB 35 project be proposed. In order to encourage development of affordable housing under SB 35, Program 1.H has been added to require the establishment of an SB 35 streamlining process within the first year of the planning period. Individual single-family homes do not require a public hearing and are approved by the Planning Department as part of the usual building plan checking process. Building permits are processed, generally in one to four months. Development of residential projects under the City's recent General Plan update have been consistent with, the densities allowed under the Land Use Map. The City's processes are not a constraint to the provision of affordable housing. The city posts current fees and exactions that are applicable to proposed housing development projects on the City's website, consistent with Government Code. Each fee is described in detail in subsequent sections of the Housing Element. The table is not meant to be exhaustive but provides a general representation of typical development fees. Total fees for a 32-unit subdivision are estimated at approximately \$19,131 per unit, 63% of which (\$11,908) are impact fees, which are not controlled by the City. Total fees for a 32-unit apartment complex are estimated at \$7,589

per unit, 73% of which (\$5,487) are non-City fees. For an affordable housing apartment project with an average per unit cost of \$208,200 per unit, the City's fees represent 3.6% of the cost of that unit, and are not a constraint to development. Furthermore, the city can waive fees for affordable housing projects, except for fees not imposed by the city such as MSHCP fees, which further reduce the cost.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The following section describes the economic atmosphere in the City of Palm Desert. This section utilizes, along with other sources, Bureau of Economic Analysis (BEA) and Bureau of Labor Statics (BLS) data. BEA data is collected at the county level, and therefore is presented for Riverside County. BLS data is presented for City of Palm Desert.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	348	4	2	0	-2
Arts, Entertainment, Accommodations	4,308	9,114	28	36	8
Construction	1,027	1,660	7	7	0
Education and Health Care Services	3,361	4,180	22	17	-5
Finance, Insurance, and Real Estate	838	1,443	5	6	1
Information	284	114	2	0	-2
Manufacturing	520	363	3	1	-2
Other Services	707	1,642	5	6	1
Professional, Scientific, Management Services	1,008	1,432	7	6	-1
Public Administration	0	0	0	0	0
Retail Trade	2,012	4,725	13	19	6
Transportation and Warehousing	473	238	3	1	-2
Wholesale Trade	449	378	3	1	-2
Total	15,335	25,293	--	--	--

Table 40 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	23,705
Civilian Employed Population 16 years and over	22,470
Unemployment Rate	5.14
Unemployment Rate for Ages 16-24	15.99
Unemployment Rate for Ages 25-65	3.40

Table 41 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	5,500
Farming, fisheries and forestry occupations	705
Service	2,825
Sales and office	6,165
Construction, extraction, maintenance and repair	1,525
Production, transportation and material moving	945

Table 42 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	17,065	85%
30-59 Minutes	2,140	11%
60 or More Minutes	915	5%
Total	20,120	100%

Table 43 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,275	120	565
High school graduate (includes equivalency)	3,620	120	1,270
Some college or Associate's degree	6,265	225	2,060

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	5,930	320	1,290

Table 44 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	8	25	375	380	485
9th to 12th grade, no diploma	205	210	270	695	650
High school graduate, GED, or alternative	1,210	1,705	730	2,575	3,455
Some college, no degree	1,510	1,345	1,410	3,975	4,490
Associate's degree	220	600	255	965	1,105
Bachelor's degree	205	1,015	1,235	2,455	3,960
Graduate or professional degree	30	370	695	1,790	2,890

Table 45 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,890
High school graduate (includes equivalency)	31,900
Some college or Associate's degree	31,825
Bachelor's degree	47,180
Graduate or professional degree	65,000

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Overall, there are 15,335 employed workers in Palm Desert according to ACS Data for 2017. The top employment sectors are:

1. Arts, Entertainment, Accommodations: 4,308 (26%)
2. Education and Health Care Services: 3,361 (20%)
3. Retail Trade: 2,012 (12%)

Describe the workforce and infrastructure needs of the business community:

The Palm Desert Community Outreach Survey for the 2023-2028 Consolidated Plan identified the top business needs as:

1. Job Creation
2. Employment Training
3. Small Business Loans
4. Rehabilitation of Commercial Buildings
5. Façade Improvements

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City is currently unaware of any planned investments that may create substantial job or business growth.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

As noted in past Consolidated Planning processes, there is an on going need for improved education and training for the workforce to meet the needs of local businesses. When looking at the employed population of at least 16 years of age, the City is lacking in population for advanced degrees which may make it difficult to fill some jobs in the City. Additionally, workforce training initiatives will continue to be a focus for the City. Overall, just 7,540 people out of 23,060 in the workforce have a Bachelor's degree or higher. That is only one third of the workforce.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Economic Development Strategic Plan (EDSP) was approved by the City Council in January of 2013. The EDSP provides an assessment of existing conditions that drive the economy of Palm Desert and is intended to help local stakeholders and City staff implement strategies that contribute to the City's economic health. The EDSP is created to assist in the enhancement of Palm Desert's business climate and support economic growth with the following goals:

- Support existing business through a variety of economic efforts, partnerships, business outreach and special events.
- Assist in the creation of new retail opportunities and commercial development.
- Support expansion of additional resort/hospitality development and improve competitiveness of existing hotel product to attract tourist and conventions.
- Provide recreational, cultural and entertainment opportunities and promote Palm Desert's quality of life and amenities to encourage growth and tourism.
- Support the City's education institutions as an important factor in the continued and diversified economic growth of Palm Desert and the Coachella Valley.
- Support the expansion of business through the promotion of new clean and renewable energy and to protect the City's quality of life and natural and financial resources.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

No.

Discussion

Overall, the most dominant employment sector for the City is Arts, Entertainment, and Accommodations due to the presence of many resorts and resort-like businesses in the area. Additionally, most of the workforce (67%) is comprised of workers that have not obtained a Bachelor's degree.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Housing problems are significantly more prominent among low-income households and those in poverty. There are three census tracts with predominant shares of households that are LMI. These census tracts are 449.19, 449.11, and 451.18.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

While there are areas in the City that are more likely to have racial or ethnic minorities, only Hispanic households are located in certain areas at a disproportionate rate. A disproportionate rate is considered to be more than 10 percentage points higher than the jurisdiction average. There is a disproportionate share of Hispanic households in the central part of the City in census tract 451.08. Households that are LMI are discussed above.

What are the characteristics of the market in these areas/neighborhoods?

These central areas of the City tends to have more renter households than owner households, with some areas having more than half the households as renters. These areas are also characterized by lower rents and home values.

Are there any community assets in these areas/neighborhoods?

These areas are adjacent to a variety of amenities in the City, including access to the City schools and parks, as well as grocery stores, and service providers.

Are there other strategic opportunities in any of these areas?

Areas with high concentrations of low income and poverty level households may present an opportunity for investment through services and public facility funding.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

N/A

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

N/A

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

n/a

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

n/a

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan is the culmination of findings from the Needs Assessment, Market Analysis, public input, and the City's 2023 Analysis of Impediments to fair Housing Choice. The following goals have been identified as the overarching strategies for the 2023-2028 Consolidated Plan:

1. Support essential senior services
2. Support public and community facilities improvements
3. Preserve affordable housing
4. Support fair housing initiatives
5. Fund vital community and homeless services

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	Citywide
	Area Type:	Citywide
	Other Target Area Description:	Citywide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

CDBG funds are not allocated geographically, and area available to eligible households Citywide.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Affordable Senior Housing (Increase)
	Priority Level	High
	Population	Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Other
	Geographic Areas Affected	Citywide
	Associated Goals	Support Essential Senior Services Preserve and Enhance Affordable Housing
	Description	
	Basis for Relative Priority	
2	Priority Need Name	Increase Senior Services and Programming
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Other
	Geographic Areas Affected	Citywide
	Associated Goals	Support Essential Senior Services Support Public and Community Facilities Improvemen Fund Vital Community and Homeless Services

	Description	There is an increase in the Senior population in the City of Palm Desert that are inâ€¢need. These households have a variety of housing and service needs and continue to be a high priority within the City.
	Basis for Relative Priority	There is an increase in the Senior population in the City of Palm Desert that are inâ€¢need. These households have a variety of housing and service needs and continue to be a high priority within the City.
3	Priority Need Name	Senior Transportation (Enhance Options)
	Priority Level	High
	Population	Low Moderate Middle Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities
	Geographic Areas Affected	Citywide
	Associated Goals	Support Essential Senior Services
	Description	There is an increase in the Senior population in the City of Palm Desert that are inâ€¢need. These households have a variety of housing and service needs and continue to be a high priority within the City.
	Basis for Relative Priority	Priorities based on the Needs Assessment and public input.
4	Priority Need Name	Increase Affordable Housing
	Priority Level	High

	Population	Low Moderate Middle Elderly Individuals
	Geographic Areas Affected	Citywide
	Associated Goals	Preserve and Enhance Affordable Housing
	Description	Housing for low to moderate income households is a high priority in the City as so many households face cost burdens and other housing problems.`
	Basis for Relative Priority	Priorities based on the Needs Assessment and public input.
5	Priority Need Name	Reduce vacancies in the City
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	Citywide
	Associated Goals	Preserve and Enhance Affordable Housing Support Fair Housing Initiatives
	Description	Public Facilities, including infrastructure, continues to be a highly rated need in the City of Palm Desert.
	Basis for Relative Priority	Priorities based on the Needs Assessment and public input.
6	Priority Need Name	Rental Assistance
	Priority Level	High

	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Unaccompanied Youth
	Geographic Areas Affected	Citywide
	Associated Goals	Preserve and Enhance Affordable Housing Support Fair Housing Initiatives
	Description	Homelessness continues to be a need within Palm Desert. While the City continues to support efforts that seek to end homelessness, it remains a high priority in the City.
	Basis for Relative Priority	Priorities based on the Needs Assessment and public input.

Narrative (Optional)

The following goals have been identified as the overarching strategies for the 2023-2028 Consolidated Plan:

1. Support essential senior services
2. Support public and community facilities improvements
3. Preserve affordable housing
4. Support fair housing initiatives
5. Fund vital community and homeless services

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City does not have the funds to operate a TBRA program
TBRA for Non-Homeless Special Needs	The City does not have the funds to operate a TBRA program
New Unit Production	While the production of new units continues to rise, the City's limited resources prohibits the use of funds to develop new units on any scale.
Rehabilitation	The need for unit rehabilitation is high.
Acquisition, including preservation	Due to limited funding and the high cost of housing, the availability of the City to commit funds to acquisition is low.

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	393,904	0	0	393,904	1,575,616	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	0	0	0	0	0	

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In addition, the County of Riverside Adult Services/Homeless Unit and CoC Collaborative Applicant has funding allocated for (1) Emergency Shelter, (2) Prevention, (3) Rapid Re-Housing, (4) Outreach, (5) HMIS/data collection, and (6) ESG Administration. The City continues to provide its allocation of Proposition 13 Rata Share funding to the County for distribution through the CoC; however, the County has indicated that it is unable to provide the City with the dollar amount of its share, but does recognize that the City is participating.

Palm Desert Housing Authority Revenue (Program) Income: (Formerly referred to as Redevelopment Housing Set-Aside Funds): Formerly, Set-Aside Funds were used for housing activities such as acquisition, rehabilitation, new construction, rental assistance, and the Homebuyers' own Payment Assistance Program. The Palm Desert Housing Authority is the housing successor entity established to preserve existing housing units and affordability of its current portfolio; however, funding is limited to revenues derived from the properties and programs (rents, sales, payoffs, etc.).

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

NOT APPLICABLE

Discussion

The City will continue to allocate CDBG funding and other sources of funding when and where available to meet the needs of qualifying individuals as designated by HUD. Programs and projects will be targeted that address goals and objectives identified within the Annual Action Plan and Consolidated Plan. In addition, the funds will be targeted so as to provide the maximize benefit to those in need.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
PALM DESERT	Government	Planning	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City's Finance Department will be the primary department responsible for the implementation of the Consolidated Plan. Staff members will implement the Consolidated Plan with the assistance and cooperation of other departments, agencies, developers, entities, non-profit organizations, for profit organizations, public institutions, etc. Since specific, external partners are unknown at this time and what role they will play in the future, potential partners as well as the strengths and gaps are identified and based on a broad spectrum of situations. However, the City will work with in and all potential partners where and when possible, to fulfill the needs and goals identified within the Consolidated Plan.

The primary gaps in the institutional delivery system fall within a lack of resources and a lack of coordinated efforts across public and private service providers. In recent years, some of these gaps have been addressed with coordinated efforts through the CoC, the implementation of the 211 Community Connect System, and improved organization among organizations. However, the needs in the community continue to outweigh the available resources.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance			X
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	

Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Through the collaboration between the City, service providers, County of Riverside, and CoC services are designed to meet the needs of homeless persons and their individual needs. However, some may only require or want limited services such as temporary shelter during extreme weather conditions, food, a place to cleanup, and medical services when needed. This network of services provides a variety of housing and service need for homeless and at risk households.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The delivery system is limited by funding and coordination efforts. However, the City continues to work with organizations to fill the gaps in the delivery system and create a comprehensive network of care. There are insufficient resources to expand services or fill gaps that may exist, including access to healthcare and mental health services in the community. However, the City, County, CoC, service providers, etc. will continue to partner and leverage funds to provide needed services to all target groups, but on a limited basis. Services provided will be determined by the service providers given that it is these organizations that develop the programs and services and associated budget required to operate. Through continued partnerships, all parties obtain a clear picture not only of the service needs but the financial need as well.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

In addition to those strategies identified above within the Strategic Plan, the City will address gaps as

follows in any combination that provides the maximum benefit and/or change:

- Work with service providers to develop programs and locate sources of funding to maintain

and/or expand services where and when possible

- The City has created a Social Services Coordinator position to address gaps and promote development of an active system of care to address the needs of those experiencing homelessness in the City.
- Work to leverage funds between organizations where they will have the greatest impact
- Work with service providers to develop job training programs and employment options
- Work to continue improving political will to address homeless
- Continue partnerships and collaboration between agencies and service providers
- Continue to work with CoC to address needs of homeless and special needs services
- The City has contracted with Riverside University Health System to provide street outreach services in the City
- The City will continue to provide CDBG, City General Funds, Housing Program Funds, and other

types of funds that may become available to address homeless, non homeless (housing) special needs, affordable housing, etc.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Support Essential Senior Services	2023	2028	Non-Homeless Special Needs	Citywide	Affordable Senior Housing (Increase) Increase Senior Services and Programming Senior Transportation (Enhance Options)	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
2	Support Public and Community Facilities Improvemen	2023	2028	Non-Housing Community Development	Citywide	Increase Senior Services and Programming	CDBG: \$1,256,124	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted
3	Preserve and Enhance Affordable Housing	2023	2028	Affordable Housing	Citywide	Affordable Senior Housing (Increase) Increase Affordable Housing Reduce vacancies in the City Rental Assistance	CDBG: \$100,000	Public service activities for Low/Moderate Income Housing Benefit: 5 Households Assisted
4	Support Fair Housing Initiatives	2023	2028		Citywide	Reduce vacancies in the City Rental Assistance	CDBG: \$110,000	Public service activities for Low/Moderate Income Housing Benefit: 2000 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Fund Vital Community and Homeless Services	2023	2028	Homeless	Citywide	Increase Senior Services and Programming	CDBG: \$42,500	Homeless Person Overnight Shelter: 300 Persons Assisted Homelessness Prevention: 2000 Persons Assisted

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Support Essential Senior Services
	Goal Description	
2	Goal Name	Support Public and Community Facilities Improvemen
	Goal Description	The City of Palm Desert will enhance public facilities through funding improvement project to the benefit of low to moderate income households in the City.
3	Goal Name	Preserve and Enhance Affordable Housing
	Goal Description	
4	Goal Name	Support Fair Housing Initiatives
	Goal Description	
5	Goal Name	Fund Vital Community and Homeless Services
	Goal Description	

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Not Applicable

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not Applicable.

Activities to Increase Resident Involvements

Not Applicable.

Is the public housing agency designated as troubled under 24 CFR part 902?

Plan to remove the ‘troubled’ designation

Not Applicable.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City's Housing Element for the years 2021-2029 outlines some barriers to affordable housing for the region.

Governmental Constraints

Palm Desert provides expeditious processing for planning entitlements. The city encourages the concurrent processing of applications and can complete the process on most projects in 3 to 6 months, depending on the approving body and complexity of the application. The City requires tract map review, approval for all single-family home tracts and a precise plan for multi-family projects, both can be processed concurrently with any other permit. For either, the review process is a simple analysis that assures that the project's design meets the requirements of the zone in which it occurs. Applications are circulated to other City departments for comments. The Precise Plan is then reviewed by the Architectural Review Commission (ARC) and approved by the Planning Commission. The ARC provides technical review, including parking, trash enclosures and similar standards, and landscaping plans for water efficiency. The ARC meetings are public, ARC review is scheduled within 2 to 3 weeks of an application being found complete, and precedes Planning Commission hearing by 4 weeks. Public notice and mailings are made 10 days prior to a Planning Commission hearing. The findings needed for approval of either a tract map or precise plan pertain to the project's consistency with the General Plan and Zoning Ordinance; public health and safety; the site's physical ability to accommodate the project. The findings are not subjective and do not pose a constraint to development. The average processing time for a typical application is 4 to 6 months, the recently approved Montage single family homes, which received approval in 6 months, which is consistent with most Valley cities, and does not represent a constraint. The City has a building permit streamlining process, for a fee, and allows "at risk" building permit applications, which can be submitted immediately following ARC review, and prior to Planning Commission approval. The city has not received any requests for streamlined processing under SB 35, and to date has relied on the requirements of law should an SB 35 project be proposed. In order to encourage development of affordable housing under SB 35, Program 1.H has been added to require the establishment of an SB 35 streamlining process within the first year of the planning period. Individual single-family homes do not require a public hearing and are approved by the Planning Department as part of the usual building plan checking process. Building permits are processed, generally in one to four months. Development of residential projects under the City's recent General Plan update have been consistent with, the densities allowed under the Land Use Map. The City's processes are not a constraint to the provision of affordable housing. The city posts current fees and exactions that are applicable to proposed housing development projects on the City's website, consistent with Government Code. Each fee is described in detail in subsequent sections of the Housing Element. The table is not meant to be exhaustive but provides a general representation of typical development fees. Total fees for a 32-unit subdivision are estimated at approximately \$19,131 per unit, 63% of which (\$11,908) are impact fees, which are not controlled by the City. Total fees for a 32-unit apartment complex are estimated at \$7,589

per unit, 73% of which (\$5,487) are non-City fees. For an affordable housing apartment project with an average per unit cost of \$208,200 per unit, the City's fees represent 3.6% of the cost of that unit, and are not a constraint to development. Furthermore, the city can waive fees for affordable housing projects, except for fees not imposed by the city such as MSHCP fees, which further reduce the cost.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

In the City's Housing Element 2021-2029, permitting process and infrastructure requirements are comparable to those of surrounding Coachella Valley cities. Although some application fees may have increased, they remain average as compared to other jurisdictions in the region. General Plan and zoning land use designations allow for all types of development and a broad range of densities, including vertical mixed use. The City's housing policies and programs have been established and implemented, as necessary, to assure that governmental constraints are minimized.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County of Riverside CoC has established chronically homeless persons as the highest need priority based on the goals HUD has established in its Opening Doors Federal and Strategic Plan to Prevent and End Homelessness. The CoC has implemented a Coordinated Entry System (CES) to ensure appropriate intervention is utilized to serve those living on the streets and providing for a prioritization of vulnerability and linkage to community resources and housing based on the vulnerability prioritization.

Within the CoC, there are several outreach teams from County, cities, and nonprofit homeless providers that cover specific populations or geographic regions in the County. There are also specific outreach teams serving the mentally ill, veterans, youth and chronic homeless. The teams collaborate weekly and each conducts daily mobile outreach and provides client services focused on the chronically homeless populations living on the streets to connect them with supportive services and achieve housing stability. The Behavioral Health Systems Department has outreach peer specialists that perform initial field assessments, in depth assessments, referrals to all contacts, linkage to various community organizations.

Addressing the emergency and transitional housing needs of homeless persons

The Housing First approach adopted by the County and CoC requires that homeless are helped into permanent housing or rapid rehousing as soon as possible. Transitional housing beds have begun to decrease in the county and permanent housing is increasing because of reallocations made in the HUD CoC Program Consolidated Application and the CoC's success in obtaining new funding for Permanent Supportive Housing. Both Transitional Housing and Emergency shelters focus on lessening the time that a homeless person or family's length of time homeless (LOTH) in the shelter by effective and quick assessment of homeless clients and getting them stabilized into permanent housing with intensive case management initially and support in the initial phase of residency in permanent housing. This period will serve as a time to address the other needs to maintain self sufficiency either by accessing mainstream benefits, employment or medical or mental health support.

The CoC works with the Economic Development Agency and other public funding agencies to integrate CoC Programs, Emergency Solutions Grant, Social Services to Veteran Families (SSVF), and CDBG funding to increase the number of individuals and families with children with rapid rehousing. In addition, other non McKinney Vento funding sources, such as Emergency Food and Shelter Program (EFSP), funded under Federal Emergency Management Agency (FEMA) will be matched as a source for rental/mortgage assistance for families that are homeless or at risk of homelessness in the county's strategy to meet this goal.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The CoC implemented a countywide Coordinated Entry System to assess homeless individuals/families using the VI SPDAT that tracks the length of time a client has been on the streets or in Emergency Shelter. DPSS use HUD CoC Program planning grant funding to measure system wide performance in HMIS, such as length of time homeless. This is used to help the CoC prioritize and house those with longest length of time homeless. The planning process also included working with the CoC Standards and Evaluation Committee to continue developing strategies to prioritize CH individuals/families with longest time homeless and most severe needs, including:

- Increasing the supply of permanent supportive housing and rapid rehousing;
- Housing individuals/families identified in CES with the longest time homeless first; and
- Using HMIS data to record episodes of homelessness and destination at program exit to track agency and system performance.

The CoC has also adopted a “Housing First” approach that is based on new evidenced based and promising practices and endorsed by HUD to place a homeless individual or family in permanent housing and provide services to keep them stably housed.

Homeless CoC youth providers have implemented outreach and service-based events in the communities to draw homeless youth, unaccompanied and transitional age into contact with services available to them. The Operation SafeHouse is the only CoC youth provider that has opened a permanent supportive housing program called Harrison House, for transitional age youth, in the eastern desert region of Riverside County.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being

discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The County of Riverside CoC Discharge Policy is mandated by the State and followed by the CoC. The CoC established a Discharge Planning Committee, responsible for implementing policies and protocols and coordinating with various organizations, to ensure that persons being discharged from a publicly-funded institution or system of care are not discharged immediately into homelessness. The goals are to identify discharge housing needs inclusive of housing and supportive services and to link the individual with community resources that will include mental health services, substance abuse support, and housing. The Hospital Association of Southern California Inland Area serves as the lead agency on the Discharge Planning Committee to facilitate communication regarding the discharge planning needs of homeless persons from acute care hospitals. The Riverside County University Health System – Behavioral Health, collaborates with DPSS and the CoC in the coordination and implementation of discharge planning for homeless individuals disabled by a serious mental health and/or substance abuse disorder(s). Foster Care and Extended Foster Care programs help transition dependent youth who are emancipating from foster care to independent living. The Department of Public Social Services, Riverside Sheriff's, and Probation Department support the Continuum of Care's mission of working towards reintegrating persons leaving correctional facilities to community-based living and self sufficiency.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City addresses this issue on a case by case basis through the following steps:

Step 1: As newer homes are built under stricter environmental guidelines and the sale and rental of older homes are regulated to protect potential buyers and renters, while Lead based Paint Hazard is still a potential problem, it has allowed for better protection to children and adults. This minimizes lead-based paint hazards in new homes.

Step 2: The City will work with the County, residents or others to address the issue of Lead based Paint Hazards through testing and abatement efforts on a case by case basis. State law as amended under Section 302 requires housing agencies to conduct random samples of dwelling units, common areas, and exteriors to determine the presence of lead based paint hazards in pre 1979 family developments where children live or are expected to visit.

Step 3: The City's Housing Department and Building and Safety Department will ensure that regulations related to enforcement of lead based paint are carried out on City projects and on private projects, when possible, through remodels and rehabilitations of older units. Distribution of educational brochures as well as inspections will be undertaken given specific situation.

Step 4: The City will also refer calls to Citadel a firm that assist residents and businesses with Lead Based Paint, mold, and other hazards.

Step 5: The City contracts with Fair Housing Council of Riverside County, which will also distribute brochures and attend events to educate and increase awareness of this hazard.

How are the actions listed above related to the extent of lead poisoning and hazards?

The action noted above relate in that if lead poisoning did occur or was reported to the City, these are the steps that the City would undertake to remediate lead poisoning and hazards. However, there have been no reports of lead poisoning and hazards to the City in recent years. The City addresses all

reported cases as they arise; however, educational materials are distributed and available throughout the year through the City's Building and Safety Department and Housing Department.

How are the actions listed above integrated into housing policies and procedures?

The actions noted above are part of an approved procedure that the City follows to remediate cases. In addition, it is standard practice to work with other agencies specifically established to address these types of cases. The City also contracts with Riverside County Fair Housing Council to educate residents and increase awareness as part of the City's annual contract to provide services.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Anti Poverty effort was established as a result of the Economic Opportunity Action of 1964. As a result, the Community Action Program was created through the County of Riverside. Since 1979, the Community Action Program has assisted low income residents in their efforts to become self sufficient and has demonstrated a commitment to the principals of community self help and works diligently to increase awareness of its services and participation among those that are interested and have a desire to improve their quality of life. The Community Action Partnership of Riverside County provides services to address poverty. Such programs are designed based on needs within the community. The services are provided through the County of Riverside and address such issues as (1) dispute resolution center, (2) Riverside County Individual Development Accounts, (3) utility assistance and weatherization, and (4) tax preparation assistance. These programs are designed to educate participating persons on how to improve their quality of life and a means to becoming financially stable. Community Action also assists other public institutes, non profit organizations, and residents in their efforts to eliminate the conditions that bring about poverty. The broadest mission of the City will be to

address the root causes of poverty and to eliminate the conditions of poverty through well planned programs and services, where and when it can. Through programs offered through the City, service providers, and Community Action homeless, very low to low income individuals and families will attain the assistance, skills, knowledge, and motivation necessary to achieve dignity and self sufficiency if they so choose to take advantage of the programs offered. In response to the needs and issues identified throughout the Consolidated Plan, the City's has outlined how it will address poverty. Since many needs and associated programs of low income (non-poverty) are similar to those considered at the poverty level, they will be addressed in a similar fashion as outlined throughout the Consolidated Plan such as:

- Employment and Education: Jobs, job training, technical assistance, adult literacy, and life skills
- Housing: Affordable Housing; home repair and rehabilitation; emergency, transition, and permanent supportive housing
- Safety Net Services: Food panties, basic nutrition, counseling, financial management, and other forms of assistance when identified

The various programs in conjunction with other programs offered within the community and Coachella Valley as a whole benefit all persons considered low income and especially those identified as facing poverty.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City's Economic Development Department staff works to bring new business to the City which results in more employment opportunities. Through the City's overall goals and policies put in place to provide support services and affordable housing the goals, programs, and policies should be in line to create a unified approach to address this target population.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	393,904	0	0	393,904	1,575,616	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	0	0	0	0	0	

Table 54 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

In addition, the County of Riverside Adult Services/Homeless Unit and CoC Collaborative Applicant has funding allocated for (1) Emergency Shelter, (2) Prevention, (3) Rapid Re-housing, (4) Outreach, (5) HMIS/data collection, and (6) ESG Administration. The City continues to provide its allocation of Pro-Rata Share funding to the County for distribution through the CoC; however, the County has indicated that it is unable to provide the City with the dollar amount of its share, but does recognize that the City is participating.

Palm Desert Housing Authority Revenue (Program) Income: (Formerly referred to as Redevelopment Housing Set-Aside Funds): Formerly, Set-Aside Funds were used for housing activities such as acquisition, rehabilitation, new construction, rental assistance, and the Homebuyers own Payment Assistance Program. The Palm Desert Housing Authority is the housing successor entity established to preserve existing housing units and affordability of its current portfolio; however, funding is limited to revenues derived from the properties and programs (rents, sales, payoffs, etc.).

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

NOT APPLICABLE

Discussion

The City will continue to allocate CDBG funding and other sources of funding when and where available to meet the needs of qualifying individuals as designated by HUD. Programs and projects will be targeted that address goals and objectives identified within the Annual Action Plan and Consolidated Plan. In addition, the funds will be targeted so as to provide the maximize benefit to those in need.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Support Essential Senior Services	2023	2028	Non-Homeless Special Needs	Citywide	Affordable Senior Housing (Increase) Increase Senior Services and Programming Senior Transportation (Enhance Options)	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
2	Support Public and Community Facilities Improvemen	2023	2028	Non-Housing Community Development	Citywide	Senior Transportation (Enhance Options)	CDBG: \$1,256,124	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 50000 Households Assisted
3	Preserve and Enhance Affordable Housing	2023	2028	Affordable Housing	Citywide	Affordable Senior Housing (Increase) Increase Affordable Housing Reduce vacancies in the City Rental Assistance	CDBG: \$100,000	Public service activities for Low/Moderate Income Housing Benefit: 5 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Support Fair Housing Initiatives	2023	2028		Citywide	Reduce vacancies in the City Rental Assistance	CDBG: \$21,500	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
5	Fund Vital Community and Homeless Services	2023	2028	Homeless	Citywide	Increase Senior Services and Programming	CDBG: \$42,500	Homeless Person Overnight Shelter: 300 Persons Assisted Homelessness Prevention: 2000 Persons Assisted

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Support Essential Senior Services
	Goal Description	
2	Goal Name	Support Public and Community Facilities Improvemen
	Goal Description	
3	Goal Name	Preserve and Enhance Affordable Housing
	Goal Description	
4	Goal Name	Support Fair Housing Initiatives
	Goal Description	
5	Goal Name	Fund Vital Community and Homeless Services
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

The Annual Action Plan identifies funding the following activities:

Public Services (\$59,000)

Public Facilities and Improvements (\$256,124)

Program Administration (\$78,780)

Projects

#	Project Name
1	Public Service
2	Public Facilities and Improvements
3	Program Administration

Table 56 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City identifies its highest priority needs during its citizen participation process every year and the Consolidated Plan process every five years. Activities are funded annually taking into consideration these highest priority needs. The primary obstacle to address underserved needs in the community is the lack of resources to provide a greater level of assistance.

AP-38 Project Summary
Project Summary Information

1	Project Name	Public Service
	Target Area	Citywide
	Goals Supported	Support Fair Housing Initiatives Fund Vital Community and Homeless Services
	Needs Addressed	Reduce vacancies in the City
	Funding	CDBG: \$59,000
	Description	Desert Aids Project (\$10,000), Elder Love USA, Inc. (\$19,000), Fair Housing Council of Riverside County (\$21,500), and Operation SafeHouse (\$8,500). Eligible Activity (Matrix Code): 05A; 05D; 05E; 05J. CDBG National Objective: LMC
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Desert Aids Project: 130 Elder Love USA, Inc: 25 Fair Housing Council of Riverside County: 500 Operation SafeHouse: 10
	Location Description	Desert Aids Project: 1695 N. Sunrise Way Palm Springs, CA 92262 Elder Love USA, Inc.: 41550 Ecclectic Street, Palm Desert, CA 92260 Fair Housing Council of Riverside County: 3933 Mission Inn Avenue, Ste. 100, Riverside, CA 92501 Operation SafeHouse: 9685 Hayes Street, Riverside, CA 92503
2	Planned Activities	Desert Aids Project: the program transforms the lives of low-income, under-employed HIV-positive clients. Elder Love USA, Inc.: The agency will provide homeowner health and safety repairs to elderly owners and/or disabled and 65 years of age or older to their homes Fair Housing Council of Riverside County: Mandated fair housing services Operation SafeHouse: Case management services for homeless youth at a transitional living facility
	Project Name	Public Facilities and Improvements
	Target Area	Citywide
	Goals Supported	Support Public and Community Facilities Improvemen Preserve and Enhance Affordable Housing
	Needs Addressed	Increase Affordable Housing

	Funding	CDBG: \$256,124
	Description	Funding public facilities and improvements at the City of Palm Desert Cahuilla Hills Park ADA Compliance Project (\$146,124), Desert ARC ADA Restroom (\$30,000), and The Joslyn Center ADA Restroom (\$80,000) Eligible Activity (Matrix Code): 03F; 03G; 03A. CDBG National Objective: LMC
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Cahuilla Hills Park ADA Compliance: 1 facility improvement Desert ARC: 1 facility improvement The Joslyn Center: 1 facility improvement
	Location Description	City of Palm Desert Cahuilla Hills Park: 45-825 Edgehill Drive, Palm Desert, CA 92260 Desert ARC: 73-255 Country Club Dr, Palm Desert, CA 92260 The Joslyn Center: 73-750 Catalina Way, Palm Desert, CA 92260
	Planned Activities	City of Palm Desert Cahuilla Hills Park (\$146,124) – ADA restroom upgrades, ADA-compliant parking space and trailhead grading/paving to provide ADA access Desert ARC (\$30,000) – ADA restroom upgrade The Joslyn Center (\$80,000) – ADA restroom upgrade
3	Project Name	Program Administration
	Target Area	Citywide
	Goals Supported	Support Public and Community Facilities Improvemen Preserve and Enhance Affordable Housing
	Needs Addressed	Increase Affordable Housing
	Funding	CDBG: \$78,780
	Description	Program Administration (\$78,780) Eligible Activity (Matrix Code): 21A. CDBG National Objective: LMCPlanning and Administration: CDBG Citation: 570.206(a)
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Program Administration: N/A

	Location Description	Program Administration: 73510 Fred Waring Drive, Palm Desert, CA 92260
	Planned Activities	

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of Palm Desert is located in Riverside County; particularly, the Coachella Valley. Historically, the City has not had any low- and moderate-income census tracts; however, the City now has two eligible census tracts as of recently (ACS data). CDBG funds will be used for low- and moderate-income clientele (or presumed benefit).

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City has not historically funded CDBG activities based upon geographic areas since there have not been eligible low and moderate-income census tracts; however, HUD recently revised the census criteria used to determine eligibility. As a result, the City now has two CDBG-eligible census tracts. City staff is currently exploring the possibility of a Section 108 Loan for City Council's consideration in subsequent program years.

Discussion

NOT APPLICABLE

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will not undertake any projects to address affordable housing in the 2023 Program Year.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The City will not undertake activities that address public housing in the program year.

Actions planned during the next year to address the needs to public housing

Not Applicable. The City does not own nor operate public housing.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Not Applicable. The City does not own nor operate public housing.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable. The City does not own nor operate public housing.

Discussion

Not Applicable. The City does not own nor operate public housing.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City will continue to work with nonprofit organizations, government agencies, and other stakeholders to fund activities that help prevent and reduce homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County of Riverside CoC has established chronically homeless persons as the highest need priority based on the goals HUD has established in its Opening Doors Federal and Strategic Plan to Prevent and End Homelessness. The CoC has implemented a Coordinated Entry System (CES) to ensure appropriate intervention is utilized to serve those who are homeless and providing for a prioritization of vulnerability and linkage to community resources and housing based on the vulnerability prioritization. Within the CoC, there are several outreach teams from County, cities, and nonprofit homeless providers that cover specific populations or geographic regions in the County. There is also specific outreach teams serving the mentally ill, veterans, youth and chronic homeless. The Behavioral Health Systems Department has outreach peer specialists that perform initial field assessments, in depth assessments, referrals to all contacts, linkage to various community organizations.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Housing First approach adopted by the County and CoC requires that homeless are helped into permanent housing or rapid re-housing as soon as possible. Transitional housing beds have begun to decrease countywide and permanent housing is increasing because of reallocations made in the HUD CoC Program Consolidated Application and the CoC's success in obtaining new funding for permanent supportive housing. Both transitional housing and emergency shelters focus on lessening the time that a homeless person or family's length of time homeless (LOTH) in the shelter by effective and quick assessment of homeless clients and getting them stabilized into permanent housing with intensive case management initially and support in the initial phase of residency in permanent housing. This period will serve as a time to address the other needs to maintain self-sufficiency either by accessing mainstream benefits, employment or medical or mental health support.

The CoC collaborates with the City and other stakeholders to integrate CoC programs, Emergency Solutions Grant (ESG), Social Services to Veteran Families (SSVF), and CDBG funding to increase the number of persons with rapid re-housing assistance. Also, other non-McKinney-Vento funding sources, such as Emergency Food and Shelter Program (EFSP), funded under Federal Emergency Management Agency (FEMA) will be matched as a source for rental / mortgage assistance for families that are homeless or at-risk of homelessness in the County's strategy to meet this goal.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The CoC implemented a Coordinated Entry System (CES) to assess homeless persons using the VI-SPDAT that tracks the length of time a client has been on the streets or in an emergency shelter. DPSS uses HUD's CoC Program planning grant funding to measure system-wide performance in HMIS, such as length of time homeless. This is used to help the CoC prioritize and house those with longest length of time homeless. The planning process also included working with the CoC Standards and Evaluation Committee to continue developing strategies to prioritize persons with longest time homeless and most severe needs, including:

The CoC has also adopted a Housing First approach that is evidenced-based and endorsed by HUD to place a homeless person in permanent housing and provide supportive services intended to keep them stably housed.

Homeless CoC youth providers have implemented outreach and service-based events in the communities to draw homeless youth, unaccompanied and transitional age into contact with services available to them. The Operation SafeHouse is the only CoC youth provider that has opened a permanent supportive housing program called the Harrison House, which is for transitional age youth, in the eastern desert region of Riverside County.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The CoC Discharge Policy is mandated by the State and followed by the CoC. The CoC established a Discharge Planning Committee, responsible for implementing policies and protocols and coordinating with various organizations, to ensure that persons being discharged from a publicly funded institution or system of care are not discharged immediately into homelessness. The goals are to identify discharge housing needs inclusive of housing and supportive services and to link the individual with community resources that will include mental health services, substance abuse support, and housing. The Hospital Association of Southern California Inland Area serves as the lead agency on the Discharge Planning Committee to facilitate communication regarding the discharge planning needs of homeless persons from acute care hospitals. The Riverside County University Health System – Behavioral Health,

collaborates with DPSS and the CoC in the coordination and implementation of discharge planning for homeless individuals disabled by a serious mental health and/or substance abuse disorder(s). Foster Care and extended foster care programs help transition dependent youth who are emancipating from foster care to independent living. The Department of Public Social Services, Riverside Sheriff's, and Probation Department support the Continuum of Care's mission of working towards reintegrating persons leaving correctional facilities to community-based living and self-sufficiency.

Discussion

NOT APPLICABLE

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City does not plan to undertake any activities this program year using CDBG funds to remove barriers to affordable housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City does not plan to undertake any activities this program year using CDBG funds to remove barriers to affordable housing.

Discussion:

NOT APPLICABLE

AP-85 Other Actions – 91.220(k)

Introduction:

The City will continue to work with various stakeholders to meet the needs of its residents that remain in-need of CDBG-eligible activities consistent with Consolidated Plan goals.

Actions planned to address obstacles to meeting underserved needs

The City will continue to work toward the reduction/elimination of obstacles to meet underserved needs through the funding of various organizations that are established to provide direct services to those in need. The City is not equipped to provide direct services; therefore, funding organizations that do is essential to our success in addressing the identified goals and objectives. The City will continue to partner with service providers to address obstacles and address barriers that exist. In addition, the City works with the County of Riverside, the CoC, local agencies, nonprofits, etc. to address various aspects related to CoC programs and activities, as well as obstacles that face the underserved in general. However, the CoC addresses issues relative to homelessness, mental and physical illnesses, domestic violence, etc. and has a wide range of members where collaboration in other areas is an option. Through these working relationships, obstacles such as lack of communication between agencies, improved services, limited resources, tracking and monitoring, and other needed resources are obtained, gaps in services are better identified, and there is a more cohesive approach to identifying and resolving issues.

Actions planned to foster and maintain affordable housing

The City and the Palm Desert Housing Authority will continue to maintain the existing affordable housing stock through the funding sources identified previously; however, as noted with the elimination of redevelopment agencies, there is no longer what is considered “20% Set Aside Funds”. Therefore, maintaining existing properties and programs will be the primary focus, provided funding is available, for some time to come. However, new projects and programs will be planned and implemented where and when possible.

Actions planned to reduce lead-based paint hazards

The City’s Building & Safety and Housing departments distribute informational pamphlets on Lead Based Paint Hazards and refer all calls to the County of Riverside Environmental Health Department. The City addresses this issue on a case-by-case basis through multiple steps.

Actions planned to reduce the number of poverty-level families

The City is continuing to team up with service providers to provide assistance for poverty level families, including funding food and services options during the Program Year. In addition, the City will seek out additional partnerships for programs that encourage self-sufficiency including employment and training, housing options, and safety net programs.

Actions planned to develop institutional structure

The City will continue to work with outside agencies to maintain and develop relationships, including with nonprofit organizations, private businesses, the CoC, and nonprofit organizations in the region.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to work with various County departments, agencies, and nonprofit organizations to identify and carry out goals and objectives of the CDBG Program, and to create a more cooperative working relationship with all interested parties. The City invites these groups to attend public hearings, community meetings, and special meetings that address specific programs and projects. The City has an approved Citizen's Participation Plan that it follows in this regard. In addition, City staff regularly attends CoC meetings that involve multiple organizations and various County Departments as well as other local jurisdictions wherein discussions are held on homelessness as well as supportive services to other at-risk groups of individuals and families.

Discussion:

The City completed in Analysis of Impediments for Fair Housing Choice (AI). The City identified the following Goals to address contributing factors/impediments to fair housing:

- Goal #1: Support Non-Discriminatory Leading Practices
- Goal #2: Preserve existing housing stock
- Goal #3: Support the prevention of housing discrimination
- Goal #4: Support home ownership
- Goal #5: Support the development of affordable housing
- Goal #6: Update land use policies and practices to facilitate development of affordable housing
- Goal #7: Improve collaboration with regional organizations agencies

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Not applicable

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Not applicable

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable

Attachments

Citizen Participation Comments

**CITY OF PALM DESERT
NOTICE TO RECEIVE PUBLIC COMMENT AND REVIEW
OF THE COMMUNITY DEVELOPMENT BLOCK GRANT
2023-2028 CONSOLIDATED PLAN, ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING (AI), AND FY2023-2024 ANNUAL ACTION PLAN**

The City of Palm Desert is an entitlement jurisdiction that receives Community Development Block Grant (CDBG) funds directly from the U.S. Department of Housing and Urban Development (HUD). HUD has announced the City will receive \$393,904 in FY2023-2024 in CDBG funds.

As a condition to receiving these funds, the City must submit to HUD an Annual Action Plan (AAP) that explains how the City intends to invest these federal funds toward meeting the City's community development, affordable housing and homeless prevention needs.

NOTICE IS HEREBY GIVEN The public is invited to review and comment on the Draft FY 2023-2028 Consolidated Plan, Analysis of Impediments to Fair Housing (AI), and FY2023-2024 Annual Action Plan beginning Wednesday, May 24, 2023, through Thursday, June 22, 2023. Copies of the Draft FY 2023-2024 AAP will be available on the City's website at: <https://www.cityofpalmdesert.org/departments/special-programs/community-development-block-grant-cdbg>.

Questions and written comments regarding the Annual Action Plan may be addressed to Joe Barron, Senior Contracts and Grants Analyst, City of Palm Desert, 73-510 Fred Waring Drive, Palm Desert, CA 92260. Mr. Barron can be reached at (760) 776-6491, or via email at jbarron@palmdesert.gov.

Si necesita ayuda con esta notificación por favor llame al (951) 961-9068 y puede hablar con Maria Gallegos.


Anthony J. Mejia, City Clerk

City of Palm Desert, California

Publication: 05/24/2023



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Order Start Date: 05/24/2023

Order End Date: 05/24/2023

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CITY OF PALM DESERT
 NOTICE TO RECEIVE PUBLIC COMMENT AND REVIEW
 OF THE COMMUNITY DEVELOPMENT BLOCK GRANT
 2023-2028 CONSOLIDATED PLAN, ANALYSIS OF IMPEDIMENTS TO FAIR
 HOUSING (AOI), AND FY2023-2024 ANNUAL ACTION PLAN
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 Desert, 73510 Fred Waring Drive, Palm Desert, CA 92260. Mr. Barron can be
 reached at (760) 776-6781, or via email at jbarron@palmdesert.gov.
 If needed, you can also confidentially provide input at (951) 581-5063 or
qudsi.halla@conalia.com Maria Gallegos
 Anthony J. Mejia, MMC, City Clerk
 City of Palm Desert, California
 Dated: May 8, 2023
 Published: 5/24/23

**CITY OF PALM DESERT
NOTICE OF PUBLIC HEARING
OF THE COMMUNITY DEVELOPMENT BLOCK GRANT
FY 2023-2028 CONSOLIDATED PLAN, ANALYSIS OF IMPEDIMENTS TO
FAIR HOUSING (AI), AND FY2023-2024 ANNUAL ACTION PLAN**

NOTICE IS HEREBY GIVEN THAT the City of Palm Desert will hold a Public Hearing and is inviting the general public to attend the Public Hearing pursuant to the Housing and Community Development Act of 1974 as amended regarding the proposed development process relative to the Community Development Block Grant (CDBG) Program 5-Year Consolidated Plan, Analysis of Impediments (FY 2023-2028), and Annual Action Plan (FY 2023-2024) to be adopted by the City Council on June 22, 2023.

The Public Hearing will be held on **Thursday, June 22, 2023, at 4:00PM** at the Palm Desert Civic Center, 73-510 Fred Waring Drive, Palm Desert, CA 92260.

Watch the Meeting Live and Participate by joining the Zoom Meeting:

<https://palmdesert.zoom.us/j/83367449572?pwd=NE1la01Uam5wZXIPOC9KUVZTUVZlQT09#success>

Meeting ID: 833 6744 9572 One tap mobile 1(213) 338-8477

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Anthony J. Mejia, MMC, City Clerk
City of Palm Desert, California

Publication: June 11, 2023



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OrderStart Date: 06/11/2023

Order End Date: 06/11/2023

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CITY OF PALM DESERT
 NOTICE OF PUBLIC HEARING
 OF THE COMMUNITY DEVELOPMENT BLOCK GRANT
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Meeting ID: 913 674 9572 One tap mobile: 1(213) 739-8677

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 Desert, 73510 Fred Waring Drive, Palm Desert, CA 92260. Mr. Barron can be
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 puede hablar con María Gallegos.

Anthony J. Mejia, MMC, City Clerk
 City of Palm Desert, California
 Published: 6/11/23

Draft
2023



CITY OF PALM DESERT

2023 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CITY OF PALM DESERT
2023 - 2028 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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I. Introduction

As a recipient of funds from the US Department of Housing and Urban Development (HUD), the City of Palm Desert is required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to periodically review that analysis and update it as necessary. This AI provides a detailed look into the fair housing environment in Palm Desert. More specifically, this document includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and a plan to address those impediments. As part of its ongoing responsibilities as a recipient of HUD funds, the City of Palm Desert must also continuously assure equal access to services and programs it provides or assists in the community.

I. What Is An Impediment to Fair Housing Choice?

As defined by the US Department of Housing and Urban Development Fair Housing Planning Guide (1996), impediments to fair housing choice are:

Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor. To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

II. Community Participation

Throughout the preparation of the AI, a number of local agencies and organizations were contacted to obtain feedback on housing discrimination complaints and perceptions. To ensure the report responded to community concerns, the City conducted stakeholder interviews and a survey of several specific groups, including residents, housing professionals, and service providers.

III. The City's History

Palm Desert is a city in Riverside County, California, United States, in the Coachella Valley, approximately 14 miles east of Palm Springs, 121 miles northeast of San Diego, and 122 miles east of Los Angeles. A major center of growth in the Coachella Valley, Palm Desert is a popular retreat for the population from colder climates that swell its population by an estimated 31,000 each winter. Palm Desert has seen more residents become "full-timers", mainly from the coasts and urban centers of California, who have come for both affordable and high-valued homes. The City of Palm Desert was founded and incorporated in 1973. In 1980, the city's population was 11,081, and as of 2022, Palm Desert has a population of around 51,081.

A. Fair Housing Defined

Equal access to housing is fundamental to each person being able to meet essential needs and to the pursuit of personal, educational, employment, and other goals. In recognition of equal housing access as a fundamental right, the governments of the United States and the State of California have both established fair housing as a right protected by law.

Federal fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on race, color, religion, sex, national origin, familial status, and disability. The California fair housing

laws are built on the federal laws and add marital status, ancestry, source of income, sexual orientation, and "any arbitrary factor" as protected categories under the laws.

To affirmatively promote equal housing opportunity, a community must work to remove or to mitigate impediments to fair housing choice. The City of Palm Desert is dedicated to providing fair housing opportunities to all residents, to assuring compliance with all applicable laws throughout the City, and to conduct its business fairly and impartially.

B. Analysis of Impediments to Fair Housing Choice

The AI is an assessment of how laws, governmental policies, real estate practices, and local conditions may affect the location, availability, and accessibility of housing. The analysis of their impact on housing choice can highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws.

This AI adheres to the recommended scope of analysis and format in the Fair Housing Planning Guide developed by the U.S. Department of Housing and Urban Development (1996).

C. Purpose of the Analysis of Impediments

The purpose of an AI is to review conditions in the jurisdiction that may impact the ability of households to freely choose housing and to be treated equally, without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status.

The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types. An AI also examines the affordability of housing in the jurisdiction with an emphasis on housing affordable to households with annual incomes classified as low-income.

Low-income is defined as equal to or less than 80% of the adjusted Area Median Family Income (AMI) as most recently published by the U.S. Department of Housing and Urban Development. For Palm Desert, 80 percent of the AMI is \$85,000 according to the 2022 income limits issued by HUD.¹

The document has three major goals:

- To provide an overview of the City of Palm Desert and current conditions that may impact fair housing choice.
- To review the impacts of policies and practices and how they may impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
- To identify impediments to fair housing choice and actions the City will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

- A review of the population demographics, current housing affordability, laws, regulations, private market and public sector, and administrative policies, procedures, and practices of the City of Palm Desert.
- An assessment of how those laws affect the location, availability, and accessibility of housing.

¹ FY 2022 Income Limits Summary for the County of San Joaquin, U.S. Department of Housing and Urban Development, May 2022.

- An assessment of conditions, both public and private, affecting fair housing choice.

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, a jurisdiction must certify that it "actively furthers fair housing choice" through the following:

1. Completion of an Analysis of Impediments to Fair Housing Choice (AI).
2. Actions to eliminate identified impediments, and maintenance of fair housing records.

D. Legal Background

Fair housing is a right protected by both Federal and State of California laws. Among these laws, virtually every housing unit in California is subject to fair housing practices. Additional federal and state laws related to fair housing are included in Appendix A - Federal Fair Housing Laws.

I. Federal Laws

The federal **Fair Housing Act of 1968** and **Fair Housing Amendments Act of 1988** (42 U.S. Code §§ 3601- 3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

- Race or color
- Religion
- Sex
- Familial status
- National origin
- Disability (mental or physical)

Specifically, it is unlawful to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, disability, familial status, or national origin.
- Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, disability, familial status, or national origin.
- Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.
- Represent to any person because of race, color, religion, sex, disability, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- For profit, induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status, or national origin.

Reasonable Accommodations and Accessibility: The Fair Housing Amendments Act requires owners of housing facilities to make "reasonable accommodations" (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a "no pets" policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable

access-related modifications to their private living space, as well as to common use spaces, at the tenant's own expense. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

HUD Final Rule on Equal Access to Housing in HUD Programs: On March 5, 2012, HUD published the Final Rule on "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity." It applies to all McKinney-Vento-funded housing programs, as well as to other housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person's marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making housing assistance available. The proposed rule is currently on display for 60-day public comment period.

Affirmatively Furthering Fair Housing, Notice of Proposed Rulemaking: In February 2023, HUD notified all entitlements they will imminently publish in the Federal Register a Notice of Proposed Rulemaking entitled "Affirmatively Further Fair Housing". The proposed rule, which builds on and refines HUD's 2015 rule, would faithfully implement the Fair Housing Act's statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. HUD expects that implementation of this proposed rule will greatly enhance equity, human dignity, social welfare, and justice for all protected class groups.

ii. California Laws

California fair housing laws are built upon the federal laws and add marital status, ancestry, source of income, sexual orientation, and "any arbitrary factor" as protected categories under the laws.

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices.

Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

Advertising:

- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex

- Marital status
- Source of income
- Sexual orientation
- Gender identity/expression
- Genetic information
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the federal Fair Housing Amendments Act.

The **Unruh Civil Rights Act** provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can be:

- Verbal or written threats
- Physical assault and or attempted assault, and or
- Graffiti, vandalism, or property damage.

The **Bane Civil Rights Act** (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

And, finally, **California Civil Code Section 1940.3** prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most states are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

In addition to these acts, **Government Code Sections 11135, 65008, and 65580-65589.8** prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to State law require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing
- Housing for extremely low-income households, including single-room occupancy units
- Housing for persons with developmental disabilities

The California Department of Housing and Community Development (HCD) prepared the 2020 Analysis of Impediments to Fair Housing Choice. To effectively combat housing discrimination and affirmatively further fair housing, HCD has identified a multi-pronged approach that includes recommendations and action steps to address the 10 impediments to fair housing choice identified through the 2020 AI process. The recommendations and action steps will inform HCD's efforts to affirmatively further fair housing; to promote inclusive communities, further housing choice, and address community disparities through HCD's programs, policies, and operations. HCD's AFFH efforts will also follow guidance from state fair housing law, including AB 686 (2018). Some of these actions are within HCD's authority, while others will require on-going, collaborative work with state and local entities. Chapter 13 provides 10 key implements to fair housing and detailed action steps. This section can be found here: [Ch. 13 Impediments and Action Steps, Final 2020 Analysis of Impediments to Fair Housing Choice \(ca.gov\)](#). In 2021, HCD prepared a status update to the CA AI including implementation measures and actions taken thus far to reduce barriers to fair housing. [2020 AI Implementation Status Report \(ca.gov\)](#)

THE STATE OF CALIFORNIA 2020 AI IMPLEMENTATION STATUS REPORT
TOP 10 IMPEDIMENTS TO FAIR HOUSING

- **Impediment #1:** Supply and Production of Affordable Homes Inadequate supply and production of affordable homes available to lower-income households and persons in protected classes.
- **Impediment #2:** Housing Preservation Vulnerable supply of affordable homes threatens housing options for lower-income households and persons in protected classes.
- **Impediment #3:** Housing Instability and Homelessness Unequal access to supportive services, shelter, and affordable housing opportunities increases housing instability and risk of homelessness for protected classes. The Coronavirus pandemic has exacerbated existing inequalities and vulnerabilities.
- **Impediment #4:** Fair Housing Education and Enforcement Limited community awareness of fair housing protections and enforcement resources.
- **Impediment #5:** Tenant Protections and Anti-Displacement Lack of uniform enforcement and adequate anti-displacement protections have left protected classes more vulnerable to displacement.
- **Impediment #6:** Disparities in Housing Quality and Infrastructure Lower-income households, rural communities, and persons in protected classes, are disproportionately experiencing severe housing problems, a lack of adequate housing options, and disparities in infrastructure.
- **Impediment #7:** Climate and Environmental Vulnerabilities Lower-income households and protected classes are often disproportionately impacted by climate change, environmental injustice, or unsustainable land use and development practices.
- **Impediment #8:** Historic and Lasting Impact of Segregation Despite the repeal of explicitly racist and discriminatory housing laws, there remains a lasting legacy of segregation and resource disparities. Housing choice is often limited for persons of protected classes, including communities of color, to segregated concentrated areas of poverty.
- **Impediment #9:** Local Resistance and Exclusionary Land Use Policies Constrain Access to Opportunity Denying, preventing, or rendering infeasible multifamily housing development, alternative housing strategies, and affordable housing limits access for lower income households, protected classes, and persons experiencing homelessness.
- **Impediment #10:** Insufficient Accessible Housing Stock Lack of adequate accessible housing options, compared to the need, limits housing choice for people with disabilities.

E. Organization of the Report

This report is divided into eight sections:

- I. **Introduction** – Explains the purpose of the analysis of impediments to fair housing, defines fair housing, lists the data and funding sources for the report, and describes the public participation process.
- II. **Community Participation Process** – Provides a description of public outreach efforts to obtain community input on community needs and possible impediments.
- III. **Community Data** – Describes the housing and population characteristics of the City. Population characteristics include income, age, race, ethnicity, familial status, and disability. Employment characteristics are also included. Housing characteristics include unit type and tenure, housing cost, and overcrowding. The geographic distribution of households by income, race, and ethnicity is also examined.
- IV. **Public Policies** – Reviews public policies and practices to determine the potential impact on fair housing and the provision of an adequate number and appropriate types of housing.
- V. **Lending Practices** – Assesses the general level of fair housing and housing rights awareness in the private sector. Specifically, rental housing, residential real estate sales, and mortgage lending are evaluated. The analysis relies on an array of tools including interviews with stakeholders and the review of local advertisements, published data on mortgage lending, and reports of unfair housing practices.
- VI. **Fair Housing Profile** – Evaluates existing public and private programs, services, practices, and activities that aim to assure fair housing in the City. This section describes the City's recent actions to promote fair housing, provide affordable housing, and remove barriers to affordable housing. In order to identify actions taken to affirmatively further fair housing, this section reviews the City's most recent Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs).
- VII. **Five-Year Progress** – Summarizes impediments identified in 2015 and actions taken to accomplish objectives and goals used in addressing the impediments identified in the City's previous AI.
- VIII. **Actions** – Summarizes the findings regarding fair housing issues in the City and provides recommendations for furthering fair housing. In this section, the reader can find the impediments identified and the actions proposed to address those impediments.
- IX. **Appendices** – Appendix A (Federal Fair Housing Laws) and Appendix B (Community Outreach Summary).

F. Data Sources

In preparation of this Analysis of Impediments to Fair Housing Choice (AI), the following data sources were consulted.

American Community Survey (ACS) 2013-2017 - 5-Year Estimates, U.S. Census Bureau. ACS data are obtained from a nationwide survey on demographic, social, economic, and housing information conditions. The 5-Year Estimate includes 60 months of collected data for all population size areas. It utilizes the largest sample size of all the Survey forms (1-Year, 3-Year and 5-Year Estimates) and is the most reliable. It is, however, the least current of the Survey forms. The 5-Year Estimate is best utilized when precision is more important than currency, and when examining tracts and other smaller geographies.

2000 and 2010 Decennial Census, U.S. Census Bureau. The Decennial Census provides comprehensive data describing demographic and housing characteristics.

California Department of Finance (DOF). The Department of Finance provides estimates on current population and housing stock based on housing construction and demolition data submitted annually by local jurisdictions.

Employment Development Department (EDD). The Employment Development Department provides current and projected labor market data.

Comprehensive Housing Affordability Strategy (CHAS). Developed by the Census Bureau for HUD, the CHAS database contains information on low- and moderate-income households, as well as housing problems (i.e., cost burden, overcrowding, and substandard conditions). In June 2018, HUD posted CHAS data based on the 2011-2015 ACS. The five-year (2010-2014) data are used by HUD and state and local governments to examine housing needs and make funding decisions. The data are available at the state, county, place, and census-tract level.

U.S. Bureau of Labor Statistics. The U.S. Bureau of Labor Statistics provides labor market data, including data on employment, wages, and earnings.

II. Community Participation Process

The Analysis of Impediments for the City of Palm Desert has been conducted in several ways: community outreach survey, public meetings, stakeholder interviews, a public meeting, and public hearing. Significant outreach efforts were made to the public, faith-based organizations, educational institutions, housing services, and health and social service organizations (including organizations providing services to homeless persons and families, persons with HIV/AIDS, victims of domestic violence, senior citizens, and extremely low to low-income populations).

A. Community Outreach Survey

A community development survey was used to help establish priorities for the City by gathering feedback on the level of need for housing and community development categories. The survey was launched via Survey Monkey on the City's website and Facebook page. Consultation with local and regional agencies is an important element in the process of the development of the plan. These consultations help to determine areas of need, or gaps in services provided by health services, social services, the County of Riverside Continuum of Care, public housing agencies and Fair Housing.

i. Survey Results

The Community Outreach Survey was used to gather public feedback and information for the 2023-2028 Consolidated plan. The survey was open to the public throughout the month of January 2023. A large majority of the survey respondents, 44 were city residents.

ii. Community Needs

The community survey asked several questions about community facility needs. The top 5 highest rated priority community facility needs are:

1. Youth Centers 54.84%
2. Parks and Recreational Facilities 50.54%
3. Neighborhood Facilities 41.94%
4. Child Care Centers 39.78%
5. Senior Centers 32.26%
6. Health Facilities 27.96%

The community survey asked about public transit accessibility:

1. 30% of survey respondents use transit regularly to get to work
2. 59% of survey respondents do not feel transit services are readily available to everyone
3. 32% of survey respondents do not use transit at all

iii. Housing Discrimination

The community survey asked several questions about housing discrimination.

When asked about housing discrimination, 19.44% of the survey respondents had encountered discrimination issues while 41.67% of respondents said they did not know anyone who had encountered discrimination issues.

When asked about discrimination reasonings, 36.36% said it was because of Race/Ethnicity, Religion, or Disability; 30.30% said Criminal History / Record Source of Income, and 27.27% said it was because of age. 33.33% of participants believe housing discrimination occurs in the city, 22.22% said it is likely, 13.89% said not likely, and 27.78% participants said they did not know.

iv. Housing Needs

The community survey asked respondents to what the priority housing needs are (in priority order):

1. Affordable rental housing
2. Energy efficiency improvements
3. Senior housing
4. Down payment assistance
5. Supportive housing
6. Housing for the disabled
7. Homeowner housing rehabilitation

When asked if affordable housing was available to them, 42.86% of participants said no.

v. Homeless Needs

The top needs for homeless populations reported in priority order are:

1. Mental health / addiction services
2. Emergency shelter space
3. Transitional housing
4. Food and clothing assistance

11.43% of participants said homeless were vulnerable to natural disasters, 52.78% said homeless should be considered in the 2023 – 2028 Consolidated Plan cycle, and 34.29% believe services and shelters for homeless people should receive financial support from the City of Palm Desert.

B. Public Meeting and Hearing

A public meeting was held on February 16, 2023, designed to solicit public input. Attendees were asked to answer key questions that collected input on the priority community and housing needs. A summary of the meeting was prepared.

What do you think City funding priorities should be?

- Staffing and operations costs for services to address the needs of low and moderate-income people
- Improvements to public facilities
- Construction projects to improve neighborhoods and community facilities
- Decent housing and a suitable living environment for the City's low- and moderate-income residents.

What challenges does your organization have with program delivery?

1. Agency staffing capacity
2. Funding – due to elimination of RDA
3. Inadequate program reporting

What are the changes you see with the needs of your clients?

Demographic shifts in in population specifically:

- Changes in neighborhood ethnicity
- Increase in age
- Increase in family households
- Increase in veteran households

The public meeting was duly advertised from February 3, 2023 to February 16, 2023, and notices were emailed to organizations from the contact list of partners and service organizations the City has compiled from past

stakeholder and community meetings related to grant funding from HUD. A Public Meeting Summary is included in Appendix B – Community Outreach.

C. Consultation with Stakeholders

Several stakeholders were consulted both in-person and over email all answering the same questionnaire. Such stakeholders included, but were not limited to, housing providers, health services, social service agencies, fair housing organizations representing protected classes, broadband internet providers, emergency management organizations, and local and regional housing and or homeless providers. The purpose of the consultations and or interviews was to carry out a needs assessment for:

- Housing needs
- Homelessness services needs
- Priority CDBG allocation activities to fund

For consistency, the stakeholders interviewed were each asked the same eight questions to elicit input and gather data on community and housing needs. A Stakeholder Summary can be found in Appendix B – Community Outreach.

D. Evaluation of Community Participation Efforts

All information was documented, and summaries have been included in Appendix B - Community Outreach. Valuable information was obtained that have been analyzed along with the Community Profile and Lender data to determine the specific impediments to Fair Housing Choice and the Analysis of Impediment Goals and Actions.

E. Reaching Underrepresented Populations

The City provided meaningful access to Limited English proficiency (LEP) persons during meetings and outreach activities. Public notice of the project's public meeting and hearing, and the online community needs survey were translated into English. Significant efforts were made to reach out to the Spanish speaking community regarding the community outreach, which included distribution of the translated fliers and surveys to over 50 emails, phone calls to the City's contacts at local community organizations. Links to survey as well as the public meeting dates were also distributed to the contacts.

i. Limited English Proficient

The City provided meaningful access to persons with LEP during meetings and outreach activities, such as through translation of documents. The City ensured effective communication with individuals with disabilities during such events, such as through the use of auxiliary aids and services (e.g., sign language interpreters, real-time captioning, large print and braille documents, etc.).

ii. R/ECAPs

There are no areas designated as Racially or Ethnically Concentrated Areas of Poverty in Palm Desert.

iii. Persons with Disabilities or Special Needs

To notify persons residing in Palm Desert about the process was done by notifying organizations that provide services to the disabled that work throughout the City of Palm Desert.

III. Community Data

The City of Palm Desert is located in Southern California, within Riverside County. This charter city was incorporated November 26th, 1973 and is the ninth city established in the County of Los Angeles. Its history includes Native American sites of the Cahuilla, a division of the Morongo Band of Mission Indians that lived here for over 10,000 years. The area was formerly known as Old Macdonald Ranch until date palms were planted in the 1920s, when it became known as Palm Village. Its first residential development occurred in 1943 as part of an Army maintenance camp, and more followed during the middle of the 20th century. The area became known as Palm Desert in 1951. Now a major center of growth in the Coachella Valley, Palm Desert is a popular retreat transplants from colder climates (the Eastern and Northern United States, and Canada), who swell its population by an estimated 31,000 each winter. Palm Desert has seen more residents become "full-timers", mainly from the coasts and urban centers of California, who have come for both affordable and high-valued homes. The City of Palm Desert has made a commitment to providing equal housing opportunities for residents of the City. As a recipient of the Community Development Block Grant (CDBG) in past years, Palm Desert has worked to provide a higher quality of life in the City. A study of the demographics of the City will describe the needs of different segments of the population, the location of homeowners and renters in the City, and describe trends over time that will be useful in determining future needs.



Figure 1: The City of Palm Desert Mapped Location

A. Demographic Summary

The City's population is estimated at 53,087 people, an increase of over 9.38 percent since the 2010 Census. At the same time the average household size increased from 2.07 to 2.12 persons per household. This could indicate a slight trend towards larger families, or a slight trend towards extended families sharing living quarters. During this same period, the housing stock increased by percent.

Most of the City's land uses have been built residentially. Single-family homes make up about 60 percent of the housing stock, the multi-family share is approximately 32 percent, and mobile homes comprise 8 percent.

The median price of a housing unit in the City of Palm Desert was estimated at \$361,200.² Median Gross Rent was 1,353.³

This chapter is dedicated to providing a plethora of data used to determine fair housing issues that may exist in the City or region. Population growth, age characteristics, housing, income and race/ethnicity all help determine a community's housing needs and play a role in exploring potential impediments to fair housing choice.

B. Population Characteristics

Population characteristics are an indication of the housing needs of a community. Such characteristics include population growth over time, the aging trends of the local population, age and race. The City experienced population growth by eighteen percent between 2000 and 2010. The City's population increased nine percent from 2010 to 2020.

Table 1: Regional Populations Increase			
Total Population	2000	2010	2020
City	41,155	48,534	53,087
County	1,545,387	2,109,464	2,437,864
State	33,871,648	36,637,290	39,346,023

Source: Census 2000, 2010 & 2016-2020 Census

Table 2 shows that the City has experienced large population increases between 2000 and 2020. A trend of increased growth can indicate several causes: more families and individuals transitioning to full-time residences in the area as opposed to seasonal.

Table 2: Regional Populations Percent Increase			
Area	2000-2010	2010-2020	2000-2020
City	17.93%	9.38%	28.99%
County	36.50%	15.57%	57.75%
State	8.17%	7.39%	16.16%

Source: Census 2000, 2010 & 2016-2020 ACS

C. Population Age

Household age is a factor in housing choice and determines different housing needs.⁴ Households containing (18 to 24) typically can afford smaller, more affordable units; households between the ages of 25 and 44, typically look for single-family units for a growing family; empty-nesters (ages 45 to 64) are still living in a

FY 2022 Income Limits Summary for the County of San Joaquin, U.S. Department of Housing and Urban Development, May 20 22.

DIAN GROSS RENT BY BEDROOMS, Universe: Renter-occupied housing units paying cash rent, 2013-2017 American Community Survey 5-Year Estimates.

⁴ Joint Center for Housing Studies of Harvard University, The State of the Nation's Housing 2019, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 14.

larger family home and older populations of 65 and older tend to want to scale down from their bigger home to a smaller home such as a condominium or an apartment with less floor space.⁵

The largest age cohort in the City is persons between the ages 65 or older at roughly 36 percent, a larger percentage as compared to the County at 14 percent. Adults ages 45 to 64 make up 24 percent of the City's population, an equal share to that of the County estimated at 24 percent. A senior citizen is someone 65 and older. The senior population in the City is growing, therefore increased access to housing, services, recreation and healthcare will be a focus.

Table 3: Age Characteristics (2020)			
Age	City	City %	County
Under 18	7,499	14.13%	613,823
18-24	3,726	7.02%	236,238
25-44	10,291	19.39%	654,005
45-64	12,591	23.72%	581,423
65 or older	18,980	35.75%	352,375
Total:	53,087	100.00%	2,437,864

Source: 2016-2020 ACS 5-Year Estimates

D. Race and Ethnicity

The definition of race, a group of persons related by common descent or heredity, is different from the definition of ethnicity, a social group that shares a common and distinctive culture, religion, language, or the like. As such, persons of different ethnicities possess distinct preferences when choosing types of housing.⁶ As of 2020, there were 41,611 persons classified as White race/ethnicity or 78% of the City's total population, a decrease of roughly 1 % since 2010. The largest noticeable shift in race in the City was the increase in the "two or more races" category (+441.32 percent) and the Black or African American population (+117.57 percent).

Table 4: Current Race & Ethnicity Comparison						
Race/Ethnicity	City			County		
	2010	2020	% Change	2010	2020	% Change
White	41,925	41,611	-0.75%	1,365,281	1,358,654	-0.49%
Black or African American	757	1,647	117.57%	131,258	157,908	20.30%
%American Indian and Alaska Native	337	359	6.53%	20,289	18,852	-7.08%
Asian	1,729	2,389	38.17%	121,846	164,464	34.98%

⁵ Rose Quint, "Housing Preferences Across Generations," NAHB Economics and Housing Policy Group Studies (March 1, 2016).

⁶ Esther Havekes, Michael Bader, and Maria Krysan, "Realizing Racial and Ethnic Neighborhood Preferences? Exploring the Mismatches Between What People Want, Where They Search, and Where They Live," Population Research and Policy Review (2016): 102.

Native Hawaiian and Other Pacific Islander	70	80	14.29%	6,436	7,915	22.98%
Some other race	2,944	2,822	-4.14%	383,974	539,108	40.40%
Two or more races	772	4,179	441.32%	80,380	190,963	137.58%
Total	48,534	53,087	9.38%	2,109,464	2,437,864	15.57%

Source: 2006-2010 ACS 5-Year Estimates and 2016-2020 ACS 5-Year Estimates.

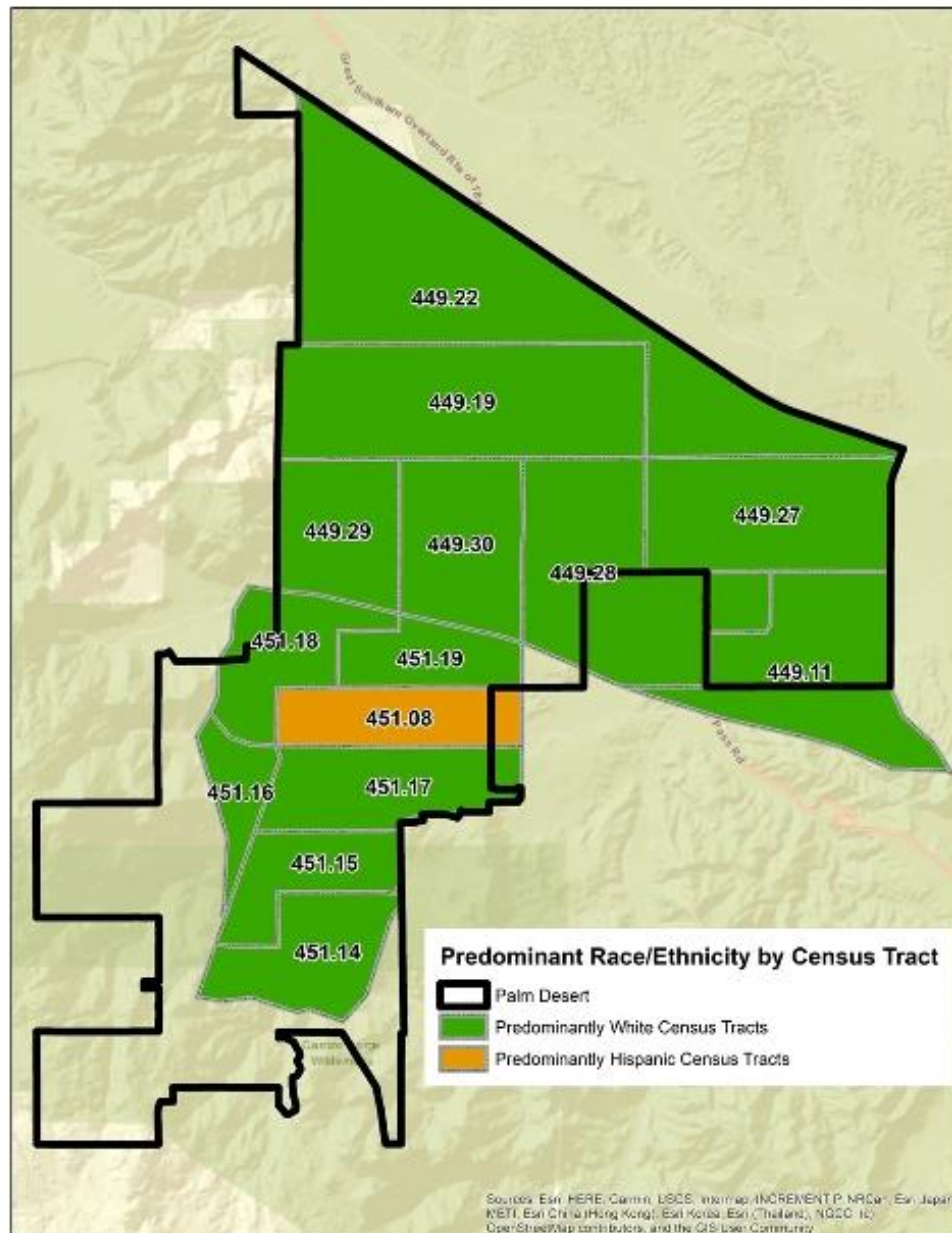


Figure 2: Predominate Race/Ethnicity by Census Tract

As indicated in Table 5, 24 percent of the City's residents speak a language other than English and 6 percent speak English less than "very well". Such findings indicate language barriers may prevent residents from accessing services, information, and housing, and may also affect educational attainment and employment. Executive Order 13166 ("Improving Access to Services by Persons with Limited English Proficiency") was issued in August 2000, which requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. This requirement passes down to grantees of federal funds as well.

Table 5: Language Spoken At Home (person 5 years old and older)		Number
Population 5 years and over		51,342
English only		39,187
Language other than English		12,155
Speak English less than "very well"		3,158
Spanish		8,375
Speak English less than "very well"		2,164
Other Indo-European languages		1,943
Speak English less than "very well"		226
Asian and Pacific Island languages		1,578
Speak English less than "very well"		680
Other languages		259
Speak English less than "very well"		88

Source: Language Spoken at Home, 2016-2020 ACS 5-Year Estimates.

E. Limited English Proficiency

According to Figure 4, the concentrations of persons of limited English proficiency are spread throughout the City. Next to English, Spanish is the most spoken language in the City. Persons that are limited in English proficiency can become culturally or linguistically isolated, tend to have less education, and earn less. To get information to these populations, regarding public services related to housing, health, or other valuable resources can be challenging without properly integrating factors related to resources, race, culture, and language.⁷ Immigrants also have limited accessibility to their jobs because they cannot receive a driver's

⁷ Enhancing Public Health Emergency Preparedness for Special Needs Populations: A Toolkit for State and Local Planning and Response, Jeanne S. Ringel, 2009.

license or may not be near transit routes. Limited English Proficiency can also have an impact on the workforce and local economy. Some employers may require English speakers.⁸



Figure 4: Limited English Proficiency
Source: AFFH Mapping Tool, U.S. Department of Housing and Urban Development, (2023)

F. Dissimilarity Index

The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. The index scale ranges from 0 to 100. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low. According to the indices shown in Table 6, segregation is low in the City.

Table 6: Index of Dissimilarity					
	1980	1990	2000	2010	2020
White - Black	4.8	11.7	19.4	24.9	21.6
White - Hispanic	9.3	17.6	39.4	37.5	32.8
White - Asian	8.5	11.0	16.4	23.7	20.7
Black - Hispanic	8.8	8.8	25.3	25.6	23.2
Black - Asian	7.6	7.5	11.1	17.5	13.6
Hispanic - Asian	1.7	9.7	27.2	25.6	27.2

⁸ Cheeseman Day, Jennifer and Shin, Hyon B. "How Does Ability To Speak English Affect Earnings?" Population Division, U.S. Census Bureau (2005).

Source: Diversity and Disparities, American Communities Project,
<https://s4.ad.brown.edu/projects/diversity/segregation2010/city.aspx?cityid=660018>

G. Household Characteristics

The U.S. Census Bureau defines a household as a family, two or more families living together, a person living alone, or unrelated persons living together. As mentioned, younger persons usually require smaller, more affordable units; families require single-family units for a growing family; though empty-nesters and the elderly prefer to age in place, if necessary, they generally scale down from bigger homes to smaller ones.⁹

I. Household Type and Size

According to the Table 7, families make up 54 percent of all households; 15 percent of all households are families with children. Households with seniors (65 and older) accounts for 53 percent of total households. Overall, households with families have increased slightly by 2 percent. However, households with families with children has decreased slightly by 2 percent. Nonfamily households have increased significantly by 10 percent. Households with seniors has increased significantly as well by 17 percent. Female-headed households saw an extremely high increased between 2010 and 2019, jumping by 449 percent. Overall, housing is needed for families and seniors.

	2010	2019 (No 2020 Data for Children)	% Change
Total Households	23,041	24,396	5.88%
Family Households	13,004	13,294	2.23%
With own children under 18 yrs	3,744	3,663	-2.16%
Married couple with family	10,580	10,835	2.41%
With own children under 18 yrs	2,398	2,465	2.79%
Female householder, no husband present	1,370	7,527	449.42%
With own children under 18 yrs	712	713	0.14%
Nonfamily households	10,037	11,102	10.61%
Householder living alone	8,620	8,736	1.35%
Householder 65 years and over	4,638	5,134	10.69%
Households with individuals under 18 years	4,008	4,091	2.07%
Households with individuals over 65 years	10,983	12,816	16.69%
Average household size	2.09	2.14	2.39%
Average family size	2.77	2.77	0.00%

Source: 2010 U.S. Decennial Census, 2015–2019 ACS 5-Year Estimates (2016–2020 does not feature data on children)

⁹ Joint Center for Housing Studies of Harvard University, The State of the Nation's Housing 2019, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 6.

H. Special Needs Populations

The special needs population are persons who are not homeless but require supportive housing. Special needs persons include the elderly (defined by HUD to be 62 and older), frail elderly (defined as an elderly person who requires assistance with three or more activities of daily living, such as bathing, walking, and performing light housework), persons with mental, physical, and/or developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, and victims of domestic violence, dating violence, sexual assault, and stalking.¹⁰

While age is not a protected class under the Fair Housing Act, information on elderly households is provided because it is often relevant to how programs operate at the local level, with some buildings or programs designated or designed to serve seniors. Since the Fair Housing Act protects families with children and persons with disabilities from discrimination, it is important to assess whether there are differences in the patterns of siting of publicly supported housing that serves families with children versus publicly supported housing that serves elderly populations. The same comparison should be done for publicly supported housing that primarily serves persons with disabilities.

i. Senior Population and Characteristics

Because of the high birth-rate during the mid-20th century and improved healthcare, seniors are living longer and are becoming a larger portion of the population everywhere.¹¹ An increase in the senior population wanting smaller homes and needing ADA accessibility, and other amenities that give seniors greater access to community services. Housing need is becoming greater for seniors in the City as well as the need for affordable housing.

Table 8: Percent of Elderly Population		
Age	Percent of Population	
	2010	2020
65-74	16.30%	17.40%
75-84	11.70%	12.90%
85 and older	4.70%	5.50%

Source: 2016-2020 ACS 5-Year Estimates

In the coming years, the baby-boom generation will be significant as will housing need for this demographic. According to survey studies, 70% of the baby-boom generation feel they may not be adequately financially prepared for retirement.¹² However, seniors prefer to age in place, which creates a need for home upgrades to accommodate their changing needs, e.g., ADA accessibility. Seniors that relocate generally opt for smaller

¹⁰ Title 24 Housing and Urban Development, Volume 1, Subtitle A-Office of the Secretary, Department of Housing and Urban Development, CFR 91.205(b, d).

¹¹ Dowell Myers & SungHo Ryu. "Baby Boomers and the Generational Housing Bubble: Foresight and Mitigation of an Epic Transition," Journal of the American Planning Association, Volume 74, (2008): 17-33.

¹² Seniorliving.org, HUD-Sponsored Senior Housing Programs, <https://www.seniorliving.org/hud-senior-housing-programs/> (accessed October 1, 2019).

homes.¹³ According to the 2016-2020 ACS, elderly persons accounted for approximately 36 percent of the City's population.

I. Disabled Population

For the most part, disabled persons earn less than the non-disabled.¹⁴ If disabled persons are earning less due to their disability, a need for affordable housing exists for this population. Additionally, physically disabled persons require housing that is accessible, for example, wheelchair accessibility. Also, under fair housing law, persons with a disability are a protected class. Section 504 of the Rehabilitation Act of 1973 prohibits discrimination against people with disabilities in programs that receive federal financial assistance. Studies have shown that persons with disabilities experience discrimination more often than their protected classes under fair housing law.¹⁵ As such, it is important to educate the public on the preventing the discrimination of physically and mentally disabled persons.

According to the 2013-2017 ACS 5 Year Estimates in Table 9, 7.3 percent of the population who lived in the City reported a disability.

% of Population	Hearing Disability	Vision Disability	Cognitive Disability	Ambulatory Disability	Self-Care Disability	Independent Living Disability
15.2%	5.90%	3.70%	5.40%	8.30%	3.40%	6.10%

Source: 2016-2020 ACS 5-Year Estimates

J. Population Living with HIV/AIDS

The Fair Housing Act prohibits housing discrimination against individuals with disabilities, including HIV or AIDS; this includes all types of housing, such as apartments, houses, mobile homes, nursing homes, assisted living centers, group homes, student housing, and homeless shelters.¹⁶

The California HIV Surveillance Report-2017 published by the California Department of Public Health, Center for Infectious Diseases in Sacramento, California in 2020 reported a total of 9,765 persons living with HIV/AIDS in the County, including 239 new cases.

Supportive services for this population can be found at: <http://www.rivcohiv aids.org/>

K. Families with Children

¹³ Joint Center for Housing Studies of Harvard University, The State of the Nation's Housing 2019, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 6.

¹⁴ United States Census Bureau, In Most Occupations, Workers with or Without Disabilities Earn About the Same, Jennifer Cheeseman Day and Danielle Taylor March 21, 2019.

¹⁵ Margery Austin Turner, Carla Herbig, Deborah Kaye, Julie Fenderson, Diane Levy, *Discrimination Against Persons with Disabilities: Barriers at Every Step*, The Urban Institute Washington DC (June 2005).

¹⁶ U.S. Department of Justice Civil Rights Division Disability Rights, Section, *Protecting the Rights of Persons Living with HIV/AIDS*, https://www.ada.gov/hiv/ada_aids_brochure.pdf.

Familial status is a protected class under fair housing law. Households, under law, cannot be denied because they have children. In some cases, landlords have created policies that include but have not been limited to limiting the number of children, restrict the ages of children permitted in units cap the number of children permitted in a unit discourage the sharing of bedrooms by children of the opposite sex, restrict buildings or floors of buildings in complexes where children were permitted, charge higher rents or require larger security deposits from renters with children, policies which landlords and property owners do not have the right to do.¹⁷ Additionally, past studies found that some landlords will flatly deny rent to female heads of household.¹⁸ The City features less families with children and less single parent households than the County.

Table 10: Families with Children 2018 (no 2020 data for children)					
Jurisdiction	Total Households	All Families with Children		Female Headed Households with Children	
		Number	% of Total Households	Number	% of all Families with Children
City	24,396	3,663	15.00%	713	19.50%
County	724,893	236,498	32.60%	36,990	15.60%

Source: ACS 2015-2019, Households and Families

Table 11: Single Parent Households, 2019		
	City	County
Total Households	24,396	724,893
# of Single Parent Households	1,074	46,632
% of Single Parent Households	4.40%	6.40%

Source: 2015-2019 ACS 5-Year Estimates, Selected Social Characteristics in the United States

L. Large Households

Large households are defined as households containing five or more occupants. A large household can sometimes indicate overcrowding, which can be related to ethnicity, age, immigration, and poverty.¹⁹ The 2016-2020 ACS identified households in the City with five or more persons, representing nearly 5 percent of all households. Of large households, 52 percent are owner-occupied, 48 percent are renter-occupied. Overall, large households and persons who own or rent have increased very little between 2010 and 2020. This percentage of large households is too small to determine if there are overcrowding exists.

¹⁷ HUD Charges Georgia Landlords with Discrimination Against Families with Children, September 12, 2019, https://www.hud.gov/press/press_releases_media_advisories/HUD_No_19_137

¹⁸ Ibid, 5.

¹⁹ The Changing Problem of Overcrowded Housing, Dowell Myers, William C. Baer & Seong-Youn Choi, pages 6626 Nov 2007.

Table 12: Household Size - Comparison				
	2010		2020	
	Number	%	Number	%
Total Occupied housing units	23,041	100.00%	24,335	100.00%
Owner occupied	15,882	68.93%	15,720	64.60%
Renter occupied	7,159	31.07%	8,615	35.40%
Owner & Renter occupied	23,041	100.00%	24,335	100.00%
1 person HH	8,620	37.41%	8,383	34.45%
2 persons HH	9,679	42.01%	10,966	45.06%
3 persons HH	2,168	9.41%	2,465	10.13%
4 persons HH	1,476	6.41%	1,308	5.37%
5 persons HH	505	2.19%	846	3.48%
6 persons HH	267	1.16%	277	1.14%
7 or more persons HH	326	1.41%	90	0.37%
Owner occupied	15,882	100.00%	15,720	100.00%
1 person HH	5,389	33.93%	5,061	32.19%
2 persons HH	7,715	48.58%	7,807	49.66%
3 persons HH	1,175	7.40%	1,470	9.35%
4 persons HH	854	5.38%	750	4.77%
5 persons HH	416	2.62%	352	2.24%
6 persons HH	172	1.08%	251	1.60%
7 or more persons HH	161	1.01%	29	0.18%
Renter occupied	7,159	100.00%	8,615	100.00%
1 person HH	3,231	45.13%	3,322	38.56%
2 persons HH	1,964	27.43%	3,159	36.67%
3 persons HH	993	13.87%	995	11.55%
4 or more persons HH	622	8.69%	558	6.48%
5 persons HH	89	1.24%	494	5.73%
6 persons HH	95	1.33%	26	0.30%
7 or more persons HH	165	2.30%	61	0.71%

Source: 2006-2010 and 2016-2020 ACS 5-Year Estimates

M. Homeless Population

The Riverside County Continuum of Care is the continuum of care for the region that includes Palm Desert. Each year, the Riverside Continuum of Care coordinates a Shelter/Housing Inventory Count (HIC), which is a Point-In-Time (PIT) inventory of service projects, and a record of utilization of services. HIC records how many beds and units are dedicated to serving people experiencing homelessness (e.g., emergency shelter, transitional housing, and safe haven) or people who have experienced homelessness and are now in permanent housing. Information gathered through the PIT survey is used by the Continuum of Care to understand the issues associated with homelessness, including causes of homelessness, service needs of the homeless, the region's unmet housing needs, and trends over time of homelessness in the region.

The 2022 PIT was held at night in January. A total of 26 unsheltered households and 0 sheltered persons were counted in Palm Desert. The majority of homeless persons are White men found living on the street, between the ages of 25 and 54.

Table 13: Homeless Point-In-Time Count			
	Sheltered	Unsheltered	Total
Persons	0	26	26

Source: Riverside County 2022 Point in Time Count

Table 14: Homeless Point-In-Time Count Survey Responses		
	#	%
Persons in Cars	1	6%
Persons in Vans	0	0
Persons in RVs or Campers	0	0
Persons in Tents	3	19%
Persons in Makeshift Shelters	0	0
Persons on the Street	12	75%
Total	16	100.0%

Source: County of Riverside Continuum of Care, 2022 Riverside County Point in Time Count

Table 15: Demographics Summary			
City of Palm Desert PIT Count			
		Number	Percent
Gender			
	Male	21	81%
	Female	3	12%
	Transgender	0	0
	Gender Non-conforming	1	3%
	Unknown	1	3%
Race/Ethnicity			
	Hispanic/Latino	8	31%
	Black/African-American	1	3%
	White	19	73%

American Indian/Alaskan Native	2	7%
Asian	0	0
Native Hawaiian/Other Pacific Islander	0	0
Multi-Racial/Other	4	15%
Age		
Under 18	0	
18-24	1	3%
25-54	23	88%
55-61	0	3%
62+	1	3%
Unknown	1	3%

Source: Riverside County 2022 Homeless Point in Time Count

N. Income Profile

A household's income determines the affordability of housing and other life activities. When a household's costs for housing and utilities consumes a large percentage of income, they are limited in their ability to increase housing size when needed or obtain access to amenities. Such limitations can become a fair housing issue. Though economic factors that affect housing choice are not a fair housing issue, some neighborhoods can become concentrated with poverty. For example, potential tenants can become victims of discrimination due to having lower incomes in various ways: stringent credit checks, flat denial due to fear of inability to pay, and more.

I. Median Income

As referenced in Table 16, the median household income for Palm Desert shows \$64,295 for the 2020 American Community Survey. Between the years 2010 and 2020, the median household income increased by 13 percent.

Table 16: Median Household Income (2010-2020)		
2010	2020	% Change
\$56,897	\$64,295	13.00%

Sources: Census 2010, ACS 2016-2020 5-Year Estimates.

For determining eligibility for assisted housing programs, which include Public Housing and the Section 8 Housing Choice voucher, the Department of Housing and Urban Development (HUD) sets income limits. Every year, HUD develops income limits based on the Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. The table below lists the 2019 income limits issued by HUD for the limit income categories.

Table 17: HUD Median Income Limits									
Median Family Income	FY Income Limit Category	Persons in Family							
		1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
\$87,400	Extremely Low (0-30%)	\$18,500	\$21,150	\$23,800	\$27,750	\$32,470	\$37,190	\$41,190	\$46,630
	Very Low (30%-50%)	\$30,800	\$35,200	\$39,600	\$44,000	\$47,550	\$51,050	\$54,600	\$58,100
		\$58,450	\$66,800	\$75,150	\$83,500	\$90,200	\$96,900	\$103,550	\$110,250
	Low Income (50% to 80%)	\$49,300	\$56,350	\$63,400	\$70,400	\$76,050	\$81,700	\$87,300	\$92,950

Source: HUD User, 2022 Income Limit Area, Riverside County

O. Low to Moderate Target Areas

The City has two low to moderate target areas, census tracts where at least 51% of incomes are between zero to 80% of the Area Median Income. According to the American Community Survey's 2016 to 2022, 9.3 percent of the population were found to live below poverty level in the City.

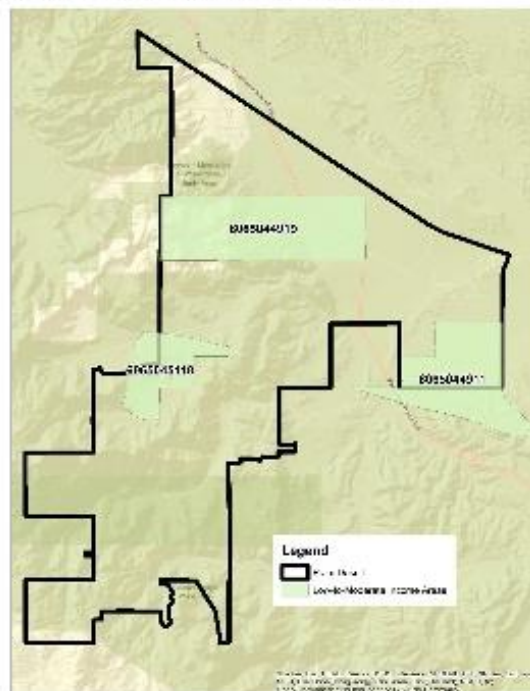


Figure 5: Low to moderate income areas by census block groups.

P. Income by Household Characteristic

The table below illustrates that approximately 45 percent of the total households in the City are extremely low, very low and low income. Additionally, the number of low-income renters and owners are relatively comparable, both representing about an even split.

Table 18: Household Income					
	Owner		Rental		Total
	#	%	#	%	
Extremely Low Income (0%-30%)	1,590	6.52%	1,875	7.69%	3,465
Very Low Income (30%-50%)	1,455	5.96%	1,670	6.85%	3,125
Low Income (50%-80%)	2,325	9.53%	2,000	8.20%	4,325

Source: CHAS 2015-2019

I. Income by Race/Ethnicity

As described earlier, of race, a group of persons related by common descent or heredity, is different from the definition of ethnicity, a social group that shares a common and distinctive culture, religion, language, or the like. In Table 19, data is analyzed to find percentages of the various incomes based on race/ethnicity. Between 2010 and 2020, the following race/ethnicity groups experienced the largest increase: Some Other Race, Black, Asian.

Table 19: Median Household Income Per Race			
Race	2010	2020	% Change
White	\$59,039	\$65,087	10.24%
Black	\$41,173	\$65,469	59.01%
Indian	\$34,583	\$41,221	19.19%
Asian	\$54,348	\$72,917	34.17%
Native Hawaiian	\$17,083	NA	NA
Some other race	\$30,361	\$50,049	64.85%
2 or More Races	\$66,792	\$78,648	17.75%
Hispanic	\$42,368	\$50,221	18.54%

Source: 2016-2020 ACS 5-Year Estimates, 2006-2010 ACS 5-Year Estimates, Median Household Income In The Past 12 Months.

Q. Racially or Ethnically Concentrated Areas of Poverty

Federal regulations require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that are concentrations of racial or ethnic minorities and low-income families. These areas are known as racially/ethnically concentrated areas of poverty (RCAPs and ECAPs).

In order to analyze the RCAPs/ECAPs in Palm Desert at a meaningful geographic scale, data was collected for block groups. Low to moderate concentrations meeting the threshold of 51 percent of residents that are low income at the tract level could not be identified in the City. Block group data was collected from the 2016-2020 American Community Survey 5-Year Estimates, which HUD currently uses for its most up-to-date low- to moderate-income designations.

For the purpose of this analysis, racial minorities are all ACS respondents who identified as a race other than white, and ethnic minorities are all those who claimed Hispanic origins. The results showed there are no areas of Racially or Ethnically Concentrated Areas of Poverty.

Table 20: RCAP/ECAP % Race/Ethnicity Per Block Group-51%or more LMI			
Tract	Block Group	% Racial Minority	% Ethnic Minority

Source: ACS 2016-2020 – No Data at this time

R. Housing Profile

An AI requires an assessment of several aspects of housing in the City. Such an assessment includes the condition of the existing housing stock, locating where and how segregation occurs due to race, ethnicity, disability, and families with children, and analyzing the cost of housing, both rental and units for sale. The amount and availability of housing accessible for persons with disabilities is also evaluated.

I. Housing Growth

Most housing development took place in the City between the middle of the 20th Century, as it did for the County. Increases in housing stock in the City have been modest in the last decade. The total number of housing units has increased by 5.94 percent since 2010. A lack of housing drives up housing costs making the City unaffordable to low-income households.

Table 21: Housing Unit Growth		
2010	2020	% Change (2010-2020)
36,868	39,058	5.94%

Source: ACS 5-Year Estimates, 2016-2020, U.S. Census 2010.

S. Housing Unit Type

The housing stock in the City is primarily comprised of single-family homes (59%) increased slightly between 2010 and 2019. The stock of smaller multifamily units (2-4 unit dwellings) decreased 12% and larger multifamily homes increased 1%. Again, the City has had very little new housing units built in the last 20 years.

Overall in the last 20 years the number of units in the City has increased by 4.5%, the population has increased 7.4%, the persons per household has increased 5% and the vacancy rate has only increased 1%.

Table 22: Housing Characteristics		
	2010	2020
1-unit, SF detached	14,584	15,417
1-unit, SF attached	10,761	8,009
2 to 4 units	2,927	5,078
Five Plus units	4,912	7,476
Mobile home	3650	3078
Occupied units	23,041	24,335
Vacancy Rate	37.5%	37.7%
Persons per Household	2.07	2.12
Total housing units	36,868	39,058

Source: US Census 2010, ACS 5-Year Estimates 2016-2020

T. Condition of Housing Units

Conducting an assessment of the current condition of housing units can support the development of City policies and programs that will preserve existing housing stock. Housing preservation increases safety, neighborhood stability, and likelihood seniors are better able to age in place. In addition, housing constructed prior to 1978 may contain lead-based paint, which must be addressed before Federal programs can fund rehabilitation to such units.

Table 23: Year Unit Built						
Year Unit Built	Owner-Occupied		Renter-Occupied		Occupied	
	Number	%	Number	%	Number	%
2014 or later	466	2.96%	214	2.48%	680	2.79%
2010 to 2013	277	1.76%	245	2.84%	522	2.15%
2000 to 2009	1,727	10.99%	1020	11.84%	2,747	11.29%
1980 to 1999	7,437	47.31%	4,082	47.38%	11,519	47.34%
1960 to 1979	4,793	30.49%	2,584	29.99%	7,377	30.31%
1940 to 1959	908	5.78%	402	4.67%	1,310	5.38%
1939 or earlier	112	0.71%	68	0.79%	180	0.74%
Total	15,720	100.00%	8,615	100.00%	24,335	100.00%

Source: ACS 5-Year Estimates, 2016-2020.

As shown in the table below, the majority of home building in the County as well as the City took place between the 1960s to 1990s. Homes in the City built 1979 and earlier totaled 12,330 and account for nearly 32 percent of total housing stock.

Table 24: Year Unit Built- City v. County				
Year Unit Built	City		County	
	Number	%	Number	%
2014 or later	807	2.07%	27,162	3.21%
2010 to 2013	832	2.13%	24,528	2.90%
2000 to 2009	4,622	11.83%	214,458	25.38%
1980 to 1999	20,467	52.40%	311,586	36.87%
1960 to 1979	10,595	27.13%	183,408	21.70%
1940 to 1959	1,555	3.98%	65,896	7.80%
1939 or earlier	180	0.46%	18,028	2.13%
Total	39,058	100.00%	845,066	100.00%

Source: ACS 5-Year Estimates, 2016-2020

U. Lead-Based Paint Hazard

Though lead based paint is a critical concern that identifies housing as substandard in the community, it presents conditions that can be corrected through rehabilitation. Projects funded by Federal programs must be tested for lead-based paint if they were constructed prior to 1978.²⁰ Children under six years old are particularly vulnerable to negative effects of lead-based paint. For the long-term safety of a community, lead-based paint should be mitigated. Nearly 32 percent of housing stock in the City were built prior to 1978.

V. Housing Tenure- Own Versus Rent and Vacant Units

As defined by the U.S. Census Bureau, Housing Tenure refers to a unit that is owner occupied if the owner lives in the unit, even if it is mortgaged or not fully paid for. All other occupied units are classified as "renter occupied," including units rented for cash rent and those occupied without payment of cash rent. Tenure preferences are primarily related to household income, composition, and age of head of household.²¹

In some cases, renters experience violation of fair housing laws more frequently than owners due to a lack of proper oversight on the part of landlords and property managers. To make housing accommodations for various incomes and needs, a city must have both ownership and rental units in its housing supply.

²⁰ US Department of Housing and Urban Development, "Making it Work - Reference Manual," <https://files.hudexchange.info/resources/documents/MakingItWorkReferenceManual.pdf>.

²¹ Joint Center for Housing Studies of Harvard University, The State of the Nation's Housing 2019, Harvard Graduate School of Design, Harvard Kennedy School, 2019, 17-18, 21.

Table 25: Household Tenure – Owner v. Renter		
Households	24,335	100.00%
Owner-Occupied	15,720	64.60%
Renter-Occupied	8,615	35.40%

Source: 2016-2020 ACS 5-Year Estimate

Table 26: Housing Unit Tenure Comparison				
Tenure Type	2010		2020	
	# of Units	Percent	# of Units	Percent
Rental	7,159	19.42%	8,615	22.06%
Owner Occupied	15,882	43.08%	15,720	40.25%
Vacant	13,827	37.50%	14,723	37.70%
Total	36,868	100.00%	39,058	100.00%

Source: 2006-2010 and 2016-2020 ACS 5-Year Estimates

The table below indicates that homes with a higher number of bedrooms are occupied by homeowners the number of owners of four-bedroom units is seven times that of renters. A higher number of small units, no bedroom and one-bedroom units, are occupied by renters.

Table 27: Unit Size by Tenure				
	Owners		Renters	
	Number	%	Number	%
No bedroom	44	0.28%	520	6.04%
1 bedroom	163	1.04%	2,210	25.65%
2 or 3 bedrooms	13,299	84.60%	5,561	64.55%
4 or more bedrooms	2,214	14.08%	324	3.76%
Total	15,720	100.00%	8,615	100.00%

Source: ACS Community Survey 5-Year Estimates, 2016-2020

W. Housing Costs

Affordable housing provides stability, allowing for budgeting for other life necessities, such as food, healthcare, transportation, and the ability to contribute to the local economy.²² When housing costs are too high, there is

²² Enterprise Community Partners, Inc., Knowledge, Impact and Strategy Department Impact of Affordable Housing on Families and Communities: A Review of the Evidence Base, Enterprise:3.

cost burden occurs, creating instability for the household. This section summarizes cost and affordability for the City.

Table 28 shows a 6 percent decrease in the cost of purchasing a home in the City, however there has been a 17 percent increase in the cost of renting a home. Median income has increased 13 percent between 2010 and 2020.

Table 28: Changes in Value, Rent, and Income			
	2010	2017	% Change
Median Housing Value	\$384,300	\$361,200	-6.0%
Median Gross Rent	\$1,160	\$1,353	16.6%
Median Household Income	\$56,897	\$64,295	13.0%

Source: 2006-2010 ACS 5-Year Estimates, 2016-2020 ACS 5-Year Estimates

Table 29: Housing Sale Prices (2021 and 2022)					
	Units Sold in 2021	Median Sale Price December 2021	Units Sold in 2022	Median Sale Price December 2022	% Change
City					
SF Homes	1,105	\$697,500	756	\$640,000	-8.2%
Condos/Towns	1,265	\$460,500	808	\$508,440	10.4%

Source: 2021, 2022 Sales Report, reported by Redfin

The high cost of home ownership makes it prohibitive for low-income households to purchase housing in the City. As shown below, affordable rent for a four-person household with low income, earning \$70,400 annually is \$1,760 per month. However, according to recent data from Rent.com, the average rent for a two bedroom is \$2,602. The affordability gap is over \$800 per month.

Table 30: Average Rental Housing Prices					
	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4+Bedrooms
City	\$729	\$974	\$1,307	\$1,691	\$2,082
County	\$861	\$944	\$1,205	\$1,532	\$1,946

Sources: ACS 5-Year Estimates, 2016-2020

Table 31: Housing Affordability (2019)				
Affordable Mortgage/Rent Amounts				
	1 Person	2 Persons	3 Persons	4 Persons
Extremely Low (0%-30%)				
Annual Income	\$18,500	\$21,150	\$23,800	\$27,750
Monthly Income	\$1,541.00	\$1,762.00	\$1,983.00	\$2,312.00
Affordable Purchase Price	\$101,000.00	\$115,000.00	\$130,000.00	\$151,000.00

Affordable Monthly Rent	\$462.50	\$528.75	\$595.00	\$693.75
Very Low (30%-50%)				
Annual Income	\$30,800	\$35,200	\$39,600	\$44,000
Monthly Income	\$2,566.00	\$2,933.00	\$3,300.00	\$3,666.00
Affordable Purchase Price	\$168,000.00	\$192,000.00	\$216,000.00	\$240,000.00
Affordable Monthly Rent	\$770.00	\$880.00	\$990.00	\$1,100.00
Low (50%-80%)				
Annual Income	\$49,300	\$56,350	\$63,400	\$70,400
Monthly Income	\$4,108.00	\$4,695.00	\$5,283.00	\$5,866.00
Affordable Purchase Price	\$269,000.00	\$308,000.00	\$347,000.00	\$385,000.00
Affordable Monthly Rent	\$1,232.50	\$1,408.75	\$1,585.00	\$1,760.00
Moderate (80%-120%)				
Annual Income	\$73,920	\$84,480	\$95,040	\$105,600
Monthly Income	\$6,160.00	\$7,040.00	\$7,920.00	\$8,800.00
Affordable Purchase Price	\$353,000.00	\$404,000.00	\$454,000.00	\$467,000.00
Affordable Monthly Rent	\$1,848.00	\$2,112.00	\$2,376.00	\$2,640.00

Source: 2022 HUD Income Limit.

Note: Affordable Monthly Rent = (HH income * .3)/12

Assumptions: 30% gross household income as affordable housing cost; includes monthly affordable cost for taxes and insurance; 10% down payment; and 4.0% interest rate for a 30-year fixed-rate mortgage loan;

<https://smartasset.com/mortgage/how-much-house-can-i-afford#PCGmA6nHyA>

Table 32: Fair Market Rent- Riverside-San Bernardino-Ontario, CA		
	2022	2023
Efficiency	\$1,062	\$1,281
1 bedroom	\$1,202	\$1,398
2 bedroom	\$1,509	\$1,751
3 bedroom	\$2,065	\$2,376
4 bedroom	\$2,542	\$2,922

Source: HUD 2022 and 2023 Fair Market Rent,

https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2022_code/2022summary.odn

Table 33: Affordable Rental Housing Units in Palm Desert				
Units	2010		2020	
	#	%	#	%
Less than \$500	640	9.19%	413	4.97%
\$500-\$999	1,968	28.26%	1,519	18.27%
\$1,000-\$1,499	2,626	37.70%	3,373	40.58%
\$1,500 or more	1,731	24.85%	3,008	36.18%
Total	6,965	100.00%	8,313	100.00%

Source: 2006-2010 ACS and 2016-2020 ACS 5-Year Estimates

X. Housing Problems

Quality of life the standard of health, comfort, and happiness experienced by an individual or group is a community's highest priority. HUD assesses housing need within a community according to several criteria: (1) the number of households that are paying too much for housing; (2) the number of households living in overcrowded units; and (3) the number of households living in substandard housing conditions. An analysis of housing problems assesses whether groups of persons, based on race, color, religion, national origin, sex, familial status, or disability, experience greater housing needs when compared to other populations the City. An assessment of cost burden, severe cost burden, overcrowding, and substandard housing is a necessary analysis in order to set goals and priorities, and develop strategies to address barriers to fair housing choice.

CHAS data provides further details on housing cost burden and overcrowding. These conditions are discussed below.

Housing affordability is measured in terms of the percentage of income spent on housing costs. Over the past decades 30% of income spent on housing is the accepted indicator of affordable housing costs.²³ HUD defines cost burden as monthly housing costs (including utilities) exceeding 30% of monthly income; severe cost burden is defined as monthly housing costs (including utilities) exceeding 50% of monthly income.

I. Cost Burden

According to the federal government, cost burden is the fraction of a household's total gross income spent on housing costs. A cost burden of 30 to 50% is considered a moderate burden; payment in excess of 50% of income is a severe cost burden. Cost burden is an important housing issue because paying too much for housing leaves less money available for basics such as food and living expenses as well as for emergency expenditures.

According to the most recent CHAS data, 5,545 renter households and 5,370 owner households earned less than 80% of the area median income (AMI) in the City. Of these, 1,875 renter households and 1,590 owner households fell into the extremely low-income category (incomes less than 30% of AMI).

Table 34 shows that renters experience cost burden at higher rate than owners at all levels of cost burden. However, 4,965 households suffer from severe cost burden, accounting for approximately 20 percent of total households in the City; and an additional 19 percent of the total households experience cost burden between 30 and 50%.

Table 34: Housing Cost Burden Overview					
Cost Burden Factor	Owner		Renter		Total
	#	%	#	%	
Cost Burden > 30%	5,105	33%	4,540	50%	9,645
Cost Burden >30% to <=50%	2,450	16%	2,230	25%	4,680
Cost Burden > 50%	2,655	17%	2,310	25%	4,965

Source: CHAS 2015-2019, <https://www.huduser.gov/portal/datasets/cp.html>

²³ *Defining Housing Affordability*, PD&R Edge Home, under HUD User, <https://www.huduser.gov/portal/pdredge/pdr-edge-featd-article-081417.html>.

As listed in Table 35, 2,740 of the City's residents that are extremely low income experience and are cost burdened and 2,370 experience severe cost burden. Approximately 39 percent of all homeowners and renters combined living in the City experience cost burden issues.

Table 35: Income by Cost Burden (Owners and Renters Combined)					
	Cost Burden > 30%		Cost Burden > 50%		Total
	#	%	#	%	
Extremely Low Income (0% - 30%)	2,740	79.08%	2,370	68.40%	3,465
Very Low Income (30%-50%)	2,330	74.56%	1,445	46.24%	3,125
Low Income (50%-80%)	2,555	59.08%	855	19.77%	4,325

Source: CHAS 2015-2019, <https://www.huduser.gov/portal/datasets/cp.html>

Table 36: Income by Cost Burden - OWNERS					
	Cost Burden > 30%		Cost Burden > 50%		Total
	#	%	#	%	
Extremely Low Income (0% - 30%)	1,220	76.73%	1,085	68.24%	1,590
Very Low Income (30%-50%)	1,060	72.85%	675	46.39%	1,455
Low Income (50%-80%)	1,205	51.83%	665	28.60%	2,325

Source: CHAS 2015-2019, <https://www.huduser.gov/portal/datasets/cp.html>

Table 37: Income by Cost Burden - RENTERS					
	Cost Burden > 30%		Cost Burden > 50%		Total
	#	%	#	%	
Extremely Low Income (0% - 30%)	1,520	81.07%	1,285	68.53%	1,875
Very Low Income (30%-50%)	1,270	76.05%	770	46.11%	1,670
Low Income (50%-80%)	1,350	67.50%	190	9.50%	2,000

Source: CHAS 2015-2019, <https://www.huduser.gov/portal/datasets/cp.html>

ii. Overcrowding

Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms.

The City experiences a 1.4 percent rate of overcrowding for owner-occupied households. Renter-occupied households have a much higher rate of overcrowding at 7.1 percent.

Table 38: Overcrowding		
	Household Tenure	
	Owner-Occupied	Renter-Occupied
Occupied Units	15,720	8,615
Overcrowded	224	611
Severely Overcrowded	62	284
Percent Overcrowded	1.4%	7.1%

Source: American Community Survey (ACS), 2016-2020

Notes:

1. Overcrowded: (1+ occupants per room)
2. Severely Overcrowded (1.5+ occupants per room)

iii. Substandard Housing

There are two types of substandard housing problems:

1. Households without hot and cold piped water, a flush toilet and a bathtub or shower; and
2. Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

According to 2015-2019 CHAS data, 145 low income renter households experience substandard Housing - Lacking complete plumbing or kitchen facilities. Of low-income homeowners, 0 experience substandard housing. Overall, more renters experience substandard housing than homeowners.

Table 39: Housing Problems (Households with one of the listed needs)										
	Renter Households					Owner Households				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	45	15	85	0	145	0	0	0	0	0

Source: CHAS 2015-2019

Y. Public Housing & Housing vouchers

The Housing Authority of Riverside County (HACR) provides rental assistance to extremely low- and very low-income households.

The federal Section 8 Housing Choice Voucher (HCV) Program provides rental assistance to very low-income households for housing. Eligible tenants pay 30% to 40% of their adjusted monthly income toward the rent

and utilities. As an example, a family who earns \$600 per month pay roughly \$180 for a month's rent. The program is open to families and individuals. Preference is given to families and disabled and elderly persons over other singles.

Housing data available indicates that the agency assists approximately 8,500 families with Housing Choice Vouchers in Riverside County. Of those families, 125 families have been assisted in the City of Palm Desert. See Table 40 for details regarding households using the HCV program.

Table 40: Housing Choice Vouchers (Riverside County)	
	Housing Choice Vouchers
Number of Families on Waiting List	68,000
Extremely Low Income (0-30% AMI)	6,375
Very Low Income (31-50% AMI)	2,125
Low Income (51-80% AMI)	Not Available
Families with Children	Not Available
Elderly Families	Not Available
Families with Disabilities	Not Available
Veterans	Not Available
Race:	
White	Not Available
Black	Not Available
Asian	Not Available
American Ind/Native Hawaiian	Not Available
Unknown/Multiple	Not Available
Hispanic	Not Available

Source: Housing Authority County of Riverside, (2023).

Note: AMI Public Housing Income Limits: At HUD's 80% Area Median Incomes (AMI)

I. Assisted Housing

It is advised by HUD that program participants should consider a balanced approach when setting goals for overcoming the effects of contributing factors and related fair housing issues. A balanced approach may include, but is not limited to, undertaking place-based solutions to improve areas, as well as pursuing options to increase mobility for protected classes, as appropriate. Place-based strategies may include but are not limited to: (1) economic development and investments in high poverty neighborhoods that will improve conditions and thereby reduce disparities in access to opportunity between impacted neighborhoods and the rest of the jurisdiction; and (2) efforts to maintain and preserve the existing affordable rental housing stock, including HUD assisted housing, to help respond to the overwhelming need for affordable housing. The City's 15 assisted housing properties, Table 41, are owned and operated by the Housing Authority, which provides 376 units for senior, very low, low, and moderate-income housing in efforts to continue to address the needs of its residents.

Table 41: Assisted Housing				
Project	Type	Affordable Units	Total Units	Program
One Quail Place	Family	382	38	Palm Desert Housing Authority
Desert Pointe	Family	62	64	Palm Desert Housing Authority
Neighbors Garden Apartments	Family	23	24	Palm Desert Housing Authority
Taos Palms	Family	16	16	Palm Desert Housing Authority
California Villas	Family	139	141	Palm Desert Housing Authority
Laguna Palms	Family	47	48	Palm Desert Housing Authority
Palm Village Apartments	Family	35	36	Palm Desert Housing Authority
Santa Rosa Apartments	Family	19	20	Palm Desert Housing Authority
The Pueblos	Senior	15	15	Palm Desert Housing Authority
Catalina Gardens	Senior	71	72	Palm Desert Housing Authority
Las Serenas Apartments	Senior	149	150	Palm Desert Housing Authority
Candlewood Apartments	Senior	29	30	Palm Desert Housing Authority
La Rocca Villas	Senior	26	27	Palm Desert Housing Authority

Carlos Ortega Villas	Senior	72	73	Palm Desert Housing Authority
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Source: Housing Element of City of Palm Desert, 2021-2029.

Z. Access to Opportunities

Housing choice greatly depends on location, not only affordability. Adequate access to jobs and schools is imperative to households to function well in the local economy. Adequate public transportation, which includes easy and safe access to bus shelter, for example, may be required for some individuals and families to obtain access to jobs and schools.

i. Public Transit

SunLine Transit Agency provides routes of bus service that serve the Coachella Valley. The service area includes Palm Desert, Coachella, Bermuda Dunes, Indian Wells, Cathedral City, North Shore, and Palm Springs. Route 1WV, Route 1EV, Route 4, Route 5, and Route 6 serve Palm Desert Mall. See the system map below.

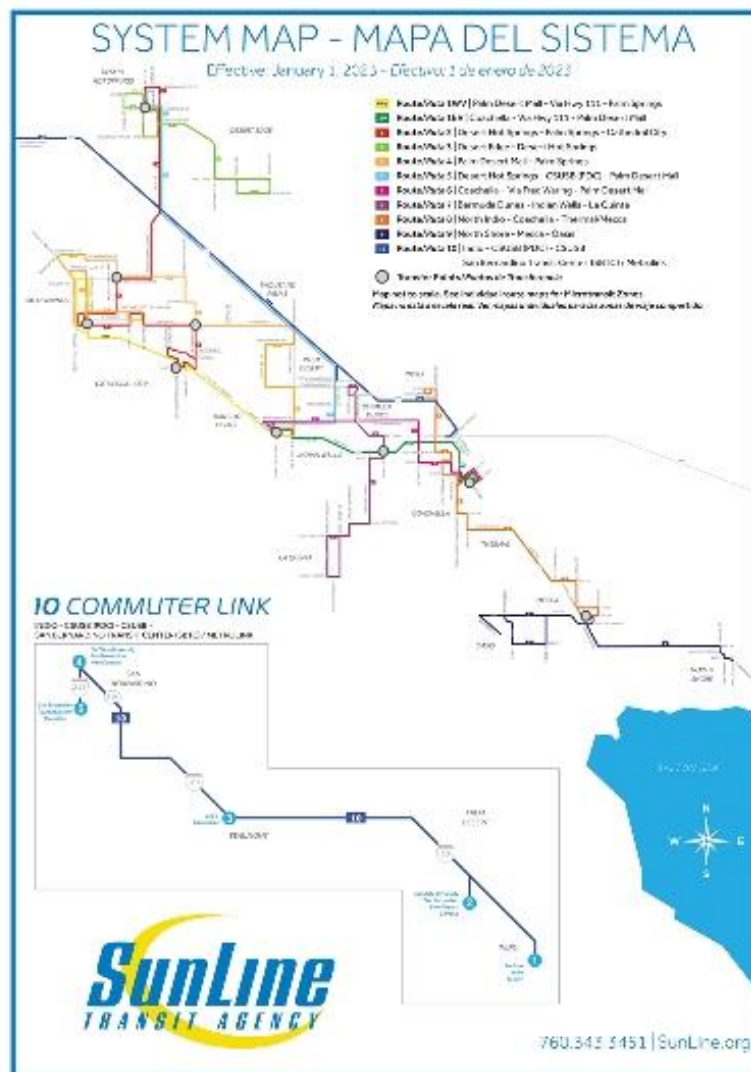


Figure 6: SunLine Transit Agency service system map, 2023.

AA. Major Employers

According to the City's Economic Development Department, employer locations are spread out through the City. For the purpose of this report, a major employer is defined as one with 500 or more employees.

Table 42: Top Employers	
	Number of Employees
JW Marriot-Desert Springs Resort and Villas	2,304
Universal Protection Services	1,500
Securitas-Security Service USA	700
Organization of Legal Pro's	501
Sunshine Landscape	500
Costco Wholesale	250
Bighorn Golf Club	250
Whole Foods Market	150

Source: City of Palm Desert, Housing Element 2021-2029

Table 43: Workforce by Industry			
	# of Total Industry	% Share	Median earnings
Agriculture, forestry, fishing and hunting, and mining	349	1.77%	\$60,900
Construction	1,799	9.10%	\$62,529
Manufacturing	594	3.00%	\$70,385
Wholesale trade	568	2.87%	\$101,310
Retail trade	2,494	12.61%	\$34,861
Transportation and warehousing, and utilities	423	2.14%	\$69,688
Information	441	2.23%	\$43,397
Finance and insurance, and real estate and rental and leasing	1,829	9.25%	\$46,625
Professional, scientific, and management, and administrative and waste management services	2,543	12.86%	\$61,984
Educational services, and health care and social assistance	3,667	18.55%	\$60,940

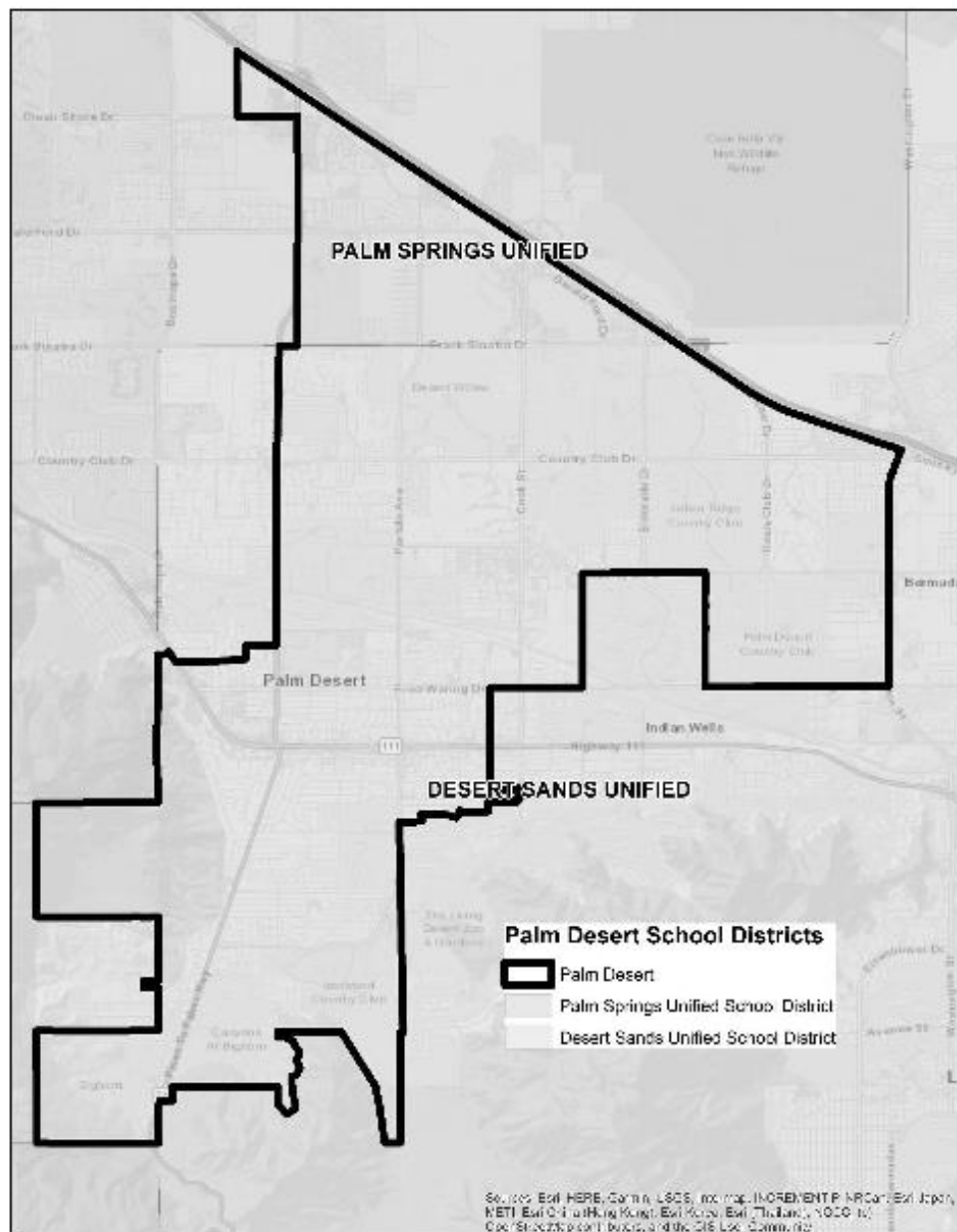
Arts, entertainment, and recreation, and accommodation and food services	3,374	17.06%	\$36,742
Other services, except public administration	1,049	5.31%	\$34,038
Public administration	643	3.25%	\$99,404
Total	19,773	100.00%	

Source: 2016-2020 ACS 5-Year Estimate

Industry by Occupation for the Civilian Employed Population 16 Years and Older
INDUSTRY BY SEX AND MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS) FOR
THE Full-Time CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

BB. Public Schools

The Palm Desert area is serviced by two school districts: Palm Springs Unified and Desert Sands Unified. See below for the boundary map.



IV. Public Policies

A potential barrier to housing opportunities can be related to public policies. Such policies include tax policy, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and other policies that affect the return on residential investment. Amending local zoning and land use laws or allocating funding for affordable housing through grants are mechanisms that can support the development of affordable units. Changes in policies can also help a community to overcome disparities in access to opportunity by the implementation of plans that will revitalize areas with existing affordable housing by improving services, schools and other community assets, sidewalks, and other infrastructure. Policies to guide future development and achieve a vision for the community are contained in the City's General Plan. Two of the seven State mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Zoning Ordinance, which implements the Land Use Element, is an important document that influences the amount and type of housing available in a community – the availability of housing choice.

A. The Housing Element

As part of evaluating potential impediments to fair housing choice and housing development, the City of Palm Desert's Housing Element was reviewed. State law requires that each local government develop a general plan as a guide for future development and must include seven elements. A Housing Element is one of the seven required elements. The Housing Element is also required by the State of California's Housing-Element Law. The purpose of the housing element is to assess the need for housing for all levels of income and establish policies to meet those needs. The policies should include the identification of sites to accommodate low-income units as well as programs geared to provide housing for low-and moderate-income residents.

The Housing Element is updated and is valid for a four-year planning period. The purpose of the housing element is to identify the community's housing needs, state the community's goals and objectives regarding housing production, rehabilitation, and conservation to meet those needs. It also defines the policies and programs to be implemented to achieve the stated housing goals and objectives. Part of the Housing Element includes city-wide assessments that includes an analysis of population and employment trends and projections, as well as an analysis of any special housing needs for the elderly, persons with disabilities, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter. Housing characteristics, which include issues such as overcrowding and current housing stock conditions are also analyzed.

California housing element law requires each jurisdiction to:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the city's regional housing needs.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

B. Land Use Policies and Practices

The City's existing Development Code regulates the type, location, density, and scale of residential development and exists to protect and promote the health, safety, and general welfare of residents. In addition, the Development Code serves to preserve the character and integrity of existing neighborhoods. The City periodically evaluates local zoning laws and policies that may affect fair housing choice.

C. Zoning for Housing

The City's General Plan is implemented by the Zoning Ordinance. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare. The Zoning Ordinance can have the effect of restricting the development of certain types of housing, such as housing of higher densities, emergency shelters, or supportive/transitional housing.

i. Residential Density

The Residential Density Summary provided is derived from the City's Land Use Element (Table 2), Land Use Plan Classifications. The highest allowed density permitted by right, is 162 dwelling units per acre.

ii. Residential Care Facilities

Residential Care Facilities are for the Elderly (RCFE) and serve persons ages 60 and older. They provide room, board, housekeeping, supervision, and personal care assistance with basic activities like personal hygiene, dressing, eating, and walking.

There are seven senior apartment projects in the City which are owned and operated by the Housing Authority, providing 376 units for very low-, low- and moderate-income senior households. Nursing care facilities in the City include the Carlotta, with 192 beds; Manorcare Health Services, with 178 beds; and Monterey Palms, with 99 beds. Numerous senior communities are located in the City, including Atria Palm Desert, Atria Hacienda, Segovia, Palm Desert Senior Living Oahu Cottage, and Fountains at the Carlotta, Legend Gardens, which provide a range of services including medical transport, assistance with housekeeping and personal care, hospice and dementia care, and onsite recreational and social opportunities.

iii. Emergency Shelters

Emergency shelters provide temporary housing with supportive services for homeless persons and families. Occupancy is limited to six months or less by persons experiencing homelessness. Under Health and Safety Code Section 50801(e), no individual or household may be denied emergency shelter because of an inability to pay. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Government Code Section 65583(c)(1)). State law (SB 2) requires local jurisdictions to calculate the need for shelter, to identify a zone where shelters are allowed without discretionary review, and to limit application of development standards for shelters to those that are applied to other development in the same zone, with the exception of objective, written standards allowed in 8 specific categories. The City permits homeless shelters in the Service Industrial (SI) zone. The City currently has no requirement for parking for emergency shelters. AB 139 requires that parking be provided for employees of emergency shelters. Program 5. 1). requires that the City add this requirement to the Zoning Ordinance in 2021- 2022, as part of its annual Zoning Ordinance update.

iv. Transitional and Supportive Housing

Transitional housing serves persons waiting for secure housing. This type of housing is known as "bridge" or "interim housing." State law (Senate Bill No. 2- Local Planning) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, (California Government Code Section 65582(h)), transitional housing is defined as buildings configured as rental housing developments but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance. Pursuant to SB 2, transitional housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit).

The City permits homeless shelters in the Service Industrial (SI) zone and transitional and supportive housing in all residential zones. Program 5, D commits the City to bring its Zoning Ordinance in compliance with AB 101 for Low Barrier Navigation Center requirements on homeless shelters, and AB 139 for parking requirements at homeless shelters. The City allows transitional and supportive housing in all residential districts subject to only those restrictions that apply to other residential uses the same type in the same zone. The General Plan allows for an additional 8, 049 residential units on 610 acres of vacant land in the City, in a range of densities, which will accommodate the City' s need for transitional and supportive housing.

v. Supportive Housing

Supportive Housing has no limit on length of stay, is occupied by the target population, and is linked to health and social services that assist the resident in retaining the housing, improving his or her health status, and maximizing the ability to live in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Currently, a number of other organizations provide shelter and services to the homeless throughout the Coachella Valley (see Table III-33 for a list of available homeless facilities in the Coachella Valley). Shelter from the Storm, which provides comprehensive services to victims of domestic violence in the Valley, operates its administrative offices in the City. Desert Horizon and Desert Vista permanent supportive housing is a program in the western Coachella Valley managed by Jewish Family Service of San Diego with 18 and 40 beds, respectively. Supportive services, including living skills, budgeting instruction, case management, employment assistance, food , distributions, advocacy, and community referrals and access to benefits, are provided.

vi. Single-Room Occupancy (SRO)

Assembly Bill 2634 amending the State Housing Element law mandates that local jurisdictions address the provision of housing options for Extremely Low-income households. Single Room Occupancy (SRO) units are small, one room units intended for occupancy by a single individual. California Housing and Community Development (HCD) considers SRO units to be a suitable housing type to meet the needs of Extremely Low-income individuals. It is distinct from a studio or efficiency unit in that each is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. SRO units are one of the most traditional forms of affordable private housing for lower income individuals, including seniors and persons with disabilities. These protected classes are required to have suitable housing options and SROs provide these options. Currently, more than 28% of the units within the City -owned affordable housing portfolio are designated for extremely low-income households. SROs are permitted in the SI zoning district with a Conditional Use Permit. ADUs are permitted in the RE, R- 1, R-2, R-3, HPR, and PR zoning districts. G

vii. Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units as an accessory agricultural use in agricultural zones, subject to the same permit process as the primary agricultural use.

Because there is a small number of persons employed in agricultural-related industries, the City can address the needs of the farm worker population through its affordable housing programs. Persons identified in the City as having agricultural jobs are most likely employed at ancillary uses to agriculture thus are not anticipated to have seasonal housing needs.

viii. Reasonable Accommodation

Under State and Federal law, local governments are required to "reasonably accommodate" housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary, to make new construction or rehabilitation of housing for persons with disabilities feasible.

ix. Permitting Process

There are different permitting procedures and timelines for development of different housing types. The table below lists the permitting process for the City. The permitting process, if not efficient, can become expensive and time consuming for developers. Costs from development review is typically passed on to the property owner/developer, making housing more costly. As a pro-development city, staff works with developers on reaching mutually beneficial solutions.

Table 44 : Processing Times				
Project Type	Reviewing Body	Public Hearing Required	Appeal Body	Est. Total Processing Time
Single-Family Subdivision	Community	Yes-Planning Commission	City Council	2-3 months
Multiple-Family (2-3 units)	Community	Not Required	Planning Commission	Less than 2 months
Multiple-Family (4+ units)	Community	Yes-Planning Commission	City Council	2-3 months
Multiple-Family (with subdivisions)	Community Development	Yes-Planning Commission	City Council	2-3 months
Mixed Use	Community Development	Yes-Planning Commission	City Council	2-3 months

D. Development Incentives

The City's Zoning Ordinance allows for a density bonus program as an incentive for the residential development of affordable housing. Government Code Section 65915 requires that a local government grant a density bonus and one additional incentive to a developer of affordable dwelling units, or other incentives of equivalent financial value. The City shall grant one density bonus, with concessions or incentives, as specified in Section 25.34.040.D (number and types of density bonuses and incentives and concessions allowed), when the

applicant for the residential development seeks and agrees to construct a residential development, excluding any units permitted by the density bonus awarded pursuant to this article, that will contain at least one of the following. The applicant shall specify which of the following is the basis for the density bonus.

- a) 10 percent of the total units of a housing development for lower-income households.
- b) 5 percent of the total units of a housing development for very low-income households.
- c) A senior citizen housing development or age-restricted mobile home park.
- d) 10 percent of the total dwelling units in a common interest development as defined in California Civil Code Section 1351 for persons and families of moderate income, provided that all units in the development are offered to the public for purchase.

Table 45: Units Required to be Affordable	
Income Level	Percent of the units shall be reserved by income level
Lower income	10%
Very low income	5%
Moderate income	10%
Qualifying residents	<70%

E. Regional Housing Needs Allocation (RHNA)

Palm Desert's Regional Housing Needs Allocation (RHNA) for the planning period has been determined to be 2,790 housing units with 337 units for extremely low income, 338 units for very low income, 460 units for low income, 461 units for moderate income, and 1,194 units for above moderate income. The table below is derived from the Housing Element and includes a list of sites the City has determined suitable for new residential development.

Table 46: Residential Development Potential on Underutilized Sites				
Sites	Acreage	Allowable Density	Realistic Density	Potential Units
Regional Retail	15 of 64.26	10 to 15	14	200
Town Center Neighborhood	8.43	22	20	169
Town Center Neighborhood	2.52	22	20	50
Town Center Neighborhood	16.32	22	20	326
Total	42.27	81	74	745

F. Equal Housing Opportunity

The City strives to support the housing needs of all members of the community, regardless of religion, sex, family size, marital status, ancestry, national origin, color, age, or physical disability. Through the Housing Rights Center, with whom the City contracts, the City provides fair housing law education and awareness of the potential of housing discrimination. The Housing Rights Center also investigates cases of housing discrimination.

V. Lending Practices

Lending practices is a contributing factor to fair housing choice because of the financial purchasing power it provides through loans. Lending is often needed to access credit financing to pay for the house mortgage and home repair loans. Conscious and unconscious bias from lenders can unfairly prevent members of some groups from accessing this financial support which affects individuals' overall access to housing and wealth accumulation. This chapter of the AI focusses on the City of Palm Desert's effort to determine and evaluate the lending practices within their own city. This includes analyzing the policies and practices that real estate agents, property managers, and mortgage lenders follow.

A. Laws Governing Lending

Discussed below are laws that govern lending practices. These laws are designed to protect consumers, support local economies, prohibit housing discrimination, and protect fair housing law. Additionally, banks are rated on their performances and this information is made available to the public.

I. Community Reinvestment Act (CRA)

The Community Reinvestment Act (CRA) was enacted in 1977 and requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help members of the community in low- and moderate-income (LMI) neighborhoods meet their credit needs.

B. Banking Regulators for the CRA

There are three federal banking agencies, or regulators, that are responsible for the CRA. Banks that have CRA obligations are supervised by one of these three regulators. Each regulator has a dedicated CRA site that provides information about the banks they oversee and those banks' CRA ratings and Performance Evaluations.

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board (FRB)
- Office of the Comptroller of the Currency (OCC)

C. Federal Reserve's Role

The Federal Reserve supervises state member banks or state-chartered banks that have applied for and have been accepted to be part of the Federal Reserve System for CRA compliance.

To carry out its role, the Federal Reserve does the following:

- Examine state member banks to evaluate and rate their performance under the CRA;
- Consider banks' CRA performance in context with other supervisory information when analyzing applications for mergers, acquisitions, and branch openings; and
- Share information about community development techniques with bankers and the public.

Figure 8 below shows the rating of banks from the CRA for the City of Palm Desert. An institution's CRA Rating is assigned using a four-tiered rating system and is updated quarterly. These ratings are: Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance. All banks rated by CRA in the City of Palm Desert received a rating of "satisfactory" except for one bank called Firstbank, N.A., which received a rating of "outstanding" and has an asset size of \$47,400.

Row #	ID	Agency Exam Date	Bank Name	City	State	CRA Rating	Asset Size (x 1,000)	Exam Method
1	57975	FDIC 12/01/2007	DESERT COMMERCIAL BANK	PALM DESERT	CA	Satisfactory	\$152,637	Small bank
2	57975	FDIC 12/01/2010	DESERT COMMERCIAL BANK	PALM DESERT	CA	Satisfactory	\$140,611	Small bank
3	20255	OCC 07/09/1991	FIRSTBANK OF PALM DESERT, N.A.	PALM DESERT	CA	Satisfactory	\$95,161	Not Reported
4	20255	OCC 03/29/1995	FIRSTBANK, N.A.	PALM DESERT	CA	Outstanding	\$47,400	Not Reported
5	20255	OCC 04/24/1997	FIRSTBANK, N.A.	PALM DESERT	CA	Satisfactory	\$79,249	Not Reported
6	14979	OTS 05/17/1999	FRONTIER BANK, FSB	PALM DESERT	CA	Satisfactory	\$17,446	Small bank
7	14979	OTS 05/01/2004	FRONTIER BANK, FSB	PALM DESERT	CA	Satisfactory	\$148,978	Small bank
8	14979	OTS 11/02/2009	FRONTIER BANK, FSB	PALM DESERT	CA	Satisfactory	\$301,402	Intermediate Small Institution
9	17121	OCC 10/01/1990	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$72,012	Not Reported
10	17121	OCC 07/16/1994	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$60,679	Not Reported
11	17121	OCC 10/08/1996	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$71,366	Not Reported
12	17121	OCC 12/07/1999	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$79,226	Small bank
13	17121	OCC 05/06/2004	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$95,623	Small bank
14	17121	OCC 11/17/2006	PALM DESERT NATIONAL BANK	PALM DESERT	CA	Satisfactory	\$293,426	Intermediate Small Institution
15	50497	FDIC 11/01/2009	SUNBEL COMMUNITY BANK	PALM DESERT	CA	Satisfactory	\$41,300	Small bank

Figure 8: CRA Rating for the City of Palm Desert

Source: Federal Financial Institutions Examination Council, Interagency CRA Rating Search for Palm Desert, CA, <https://www.ffiec.gov/craratings/> (Accessed January 24, 2023)

D. Home Mortgage Disclosure Act (HMDA)

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by Regulation C. HMDA requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. This data helps show whether lenders are serving the housing needs of their communities; provides public officials information that helps them make decisions and policies; and sheds light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy.

E. Equal Credit Opportunity Act

Issued by the Bureau of Consumer Financial Protection (Bureau), this law applies to creditors to promote the availability of credit to all creditworthy applicants without regard to race, color, religion, national origin, sex, marital status, or age, to the fact that all or part of the applicant's income derives from a public assistance program, or to the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act, of any of these factors and requires creditors to notify applicants of action taken on their applications; to report credit history in the names of both spouses on an account; to retain records of credit applications; to collect information about the applicant's race and other personal characteristics in applications for certain dwelling-related loans; and to provide applicants with copies of appraisal reports used in connection with credit transactions.

F. Types of Loans

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate-income households that may have difficulty in obtaining home mortgage financing in the private market, several government agencies offer loan products that have below market rate interests and are insured ("backed") by the agencies.

G. Government Backed Loans

Many approved loans are government back loans. There are different types of government backed loans. These loans include Federal Housing Administration (FHA) loans, Veterans Administration (VA) loans, and the Rural Housing Services/Farm Service Agency (RHA/FSA). The State of California has its own set of loan programs for low- and moderate- income households.

i. Federal Housing Administration

Loans from the Federal Housing Administration (FHA) loans have been helping people become homeowners since 1934. The Federal Housing Administration (FHA) - which is part of HUD - insures the loan, so your lender can offer you a better deal with regards to:

- Low down payments
- Low closing costs
- Easy credit qualifying

ii. State of California's Government Loan Programs

The California Housing Finance Agency (CalHFA) offers several different types of government and convention loans which are the following:

- **CalHFA FHA Loan Program** – This program is an FHA-insured loan featuring a CalHFA 30-year fixed interest rate first mortgage.
- **CalPLUS FHA Loan Program** – This program is an FHA-insured first mortgage with a slightly higher 30-year fixed interest rate than the standard FHA program and is combined with the CalHFA Zero Interest Program (ZIP) for closing costs.
- **CalHFA VA Loan Program** – This is a VA-insured loan featuring a CalHFA fixed interest rate first mortgage. This loan is a 30-year fixed interest rate first mortgage.
- **CalHFA USDA Program** – This is a USDA Guaranteed first mortgage loan program, which can be combined with the MyHome Assistance Program (MyHome). This loan is a 30-year fixed interest rate first mortgage.

H. VA Home Loans

Veterans Administration loans (VA) helps Service members, veterans, and eligible surviving spouses become homeowners. The VA loans provide a home loan guaranty benefit and other housing-related programs to help Service members buy, build, repair, retain, or adapt a home for their own personal occupancy. VA Home Loans are provided by private lenders, such as banks and mortgage companies. VA guarantees a portion of the loan, enabling the lender to provide you with more favorable terms.

I. Rural Housing Services/Farm Service Agency (RHA/FSA)

FSA/RHS-guaranteed USDA's Rural Housing Service offers a variety of programs to build or improve housing and essential community facilities in rural areas. They provide loans, grants and loan guarantees for single- and multi-family housing, childcare centers, fire and police stations, hospitals, libraries, nursing homes, schools, first responder vehicles and equipment, housing for farm laborers. The FSA/RHS also provides technical assistance loans and grants in partnership with non-profit organizations, Native American tribes, state and federal government agencies, and local communities.

J. Conventional Loans

A conventional loan is a mortgage that is not sponsored by government but is available through a private lender. Conventional loans make up for most mortgages issued. Some conventional loans must meet the requirements of Fannie Mae and Freddie Mac, the two largest buyers of mortgage loans in the United States. Studies of conventional loans in HMDA data have shown that commercial banks and thrift institutions lend less to areas (or tracts) that are low-income and predominantly minority concentrated.

Such practices have the potential to constitute discrimination and are known as redlining. The practice of redlining is a barrier to fair housing.

The State of California's CalHFA provides two types of conventional loans which are listed below:

- **CalHFA Conventional Loan Program** – This is first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalHFA Conventional is fixed throughout the 30-year term.
- **CalPLUS Conventional Loan Program** – This program is a conventional first mortgage with a slightly higher 30-year fixed interest than the standard conventional program and is combined with the CalHFA Zero Interest Program (ZIP) for closing costs.

K. Lending Findings

In analyzing the data, several findings revealed implications of potential impediments to fair housing. This section reviews lending practices of financial institutions and financing allowed to all households but with an emphasis on lending to minority and low-income households. However, a jurisdiction's control over lending is limited due to federal laws and regulations. Data used in this analysis are taken from the 2021 National HMDA-LAR published by the Federal Financial Institutions Examination Council.

Table 47 below lists the loans by type, number of applicants, and percentage of applicants. Nearly all applicants are applied for conventional loans. The table in Section L – HOME IMPROVEMENT breaks down further they usage of the Conventional Loan Types.

Table 47: Loan Type		
Loan Type	Number of Applicants	Percentage of Applicants
Conventional	6,722	88.89%
FHA	421	5.57%
VA	419	5.54%
FSA/RHS	0	0.00%
<i>Total</i>	7,562	100.00%

Source: HMDA Data 2021

I. Refinancing

Refinancing is the process of replacing an existing mortgage with a new loan. Typically, people refinance their mortgage to reduce their monthly payments, lower their interest rate, or change their loan program from an adjustable-rate mortgage to a fixed-rate mortgage.

L. Home Improvement

A home improvement loan is used to remodel or repair a private residence.³³ Home improvement loans are usually short-term. They may or may not be secured by the homes whose work they finance, but those that are secured generally carry lower interest rates. The table below lists the purpose for which were loans applied in 2018.

As mentioned previously, the loans shown in Table 48 below are Conventional Loans. Out of the 88.89% of Conventional Loans that were applied, 34.82% were for purchasing a home, 3.09% were for home improvements, and more than half of the Conventional Loans were used for refinancing a home. According to Table 49, 1.93% of the applications were rejected. More than half of the applications, about 56.20%, were approved.

Table 48: Purpose of Loan Applied For		
Purchase	2,633	34.82%
Home Improvement	234	3.09%
Refinance	4,457	58.94%
Other	220	2.91%
NA	18	0.24%
Invalid	0	0.00%
Total	7,562	100.00%

Source: HMDA Data 2021

Table 49: Action by Lender		
Action	Number of Applicants	Percentage of Applicants
Originated	4,250	56.20%
Denied	812	10.74%
Rejected by Applicant	146	1.93%
Withdrawn	1,188	15.71%
Incomplete	368	4.87%
Purchased	796	10.53%
PreApproval Denied	0	0.00%
PreApproval Rejected	2	0.03%
Invalid	0	0.00%
Total	7,562	100.00%

Source: HMDA Data 2021

M. Demographics of Loan Applicants

In the table below, White residents' makeup more than half, 61.36% of all applicants for loans. According to the 2021 American Community Survey 5-year Estimate, 66.3% of the City is White and not Hispanic, making their representation of applicants nearly even with their respective percentage of the City's population. However, only 6.73% of applicants were Hispanic, making them underrepresented as applicants for loans because they represent 21.7% of the City's population. Whereas the approval rating for other races - Black, Asian, Native American, Hawaiian- their numbers as applicants were proportionate to their population in the City.

Table 50: Demographics of Loan Applicants		
Race	Number of Applicants	Percentage of Applicants
White	4,893	61.36%
Black	105	1.32%
Hispanic	537	6.73%
Asian	246	3.09%
Native American	25	0.31%
Hawaiian	12	0.15%
Multi Race	8	0.10%
Unknown	2,147	26.93%
NA	0	0.00%
Invalid	1	0.01%
Total	7,974	100.00%

Source: HMDA Data 2021

N. Income of Loan Applicants

For applicants by income, most applicants, 54.21% were in the upper income bracket. As mentioned, above, approximately 56.2% of loans were approved. According to the HMDA reports, the primary reason for denials was income to debt ratio, followed by amount of collateral, and credit history, respectively.

Table 51: Applicants by Income Level		
Income Level	Number of Applications	% Applications
Low	717	9.48%
Moderate	1,079	14.27%
Middle	707	9.35%
Upper	4,099	54.21%
Unk/NA	960	12.70%
Invalid	0	0.00%
Total	7,562	100.00%

Source: HMDA Data 2021

Finally, lenders with the highest denial rates in the City are listed below. They are listed in order from highest denial rates to lowest.

Table 52: Lenders with Highest Denial Rates (Among lenders with 175+ applications)				
Rank	Lenders (see footnote)	Applications	Denials	%
1	Bank of America, National Association	190	62	32.63%
2	US Bank National Association	179	38	21.23%
3	Wells Fargo Bank, National Association	329	68	20.67%
4	Loandepot.com, LLC	309	35	11.33%
5	Rocket Mortgage, LLC	492	55	11.18%
6	United Shore Financial Services, LLC	582	53	9.11%
7	Home Point Financial Corporation	186	11	5.91%
8	Guaranteed Rate, Incorporated	178	8	4.49%
9	Freedom Mortgage Corporation	191	8	4.19%
10	Franklin Loan Corporation	348	3	0.86%
	Number of Lenders = 10 Totals	2984	341	11.43%

Source: HMDA Data 2021

VI. Fair Housing Profile

This section discusses the institutional structure of the housing industry regarding fair housing practices. Fair housing services available to City residents will also be covered and shall include data regarding fair housing complaints received by the fair housing provider, how fair housing investigation and resolution of housing discrimination complaints are handled, and discrimination auditing/testing results will be discussed. The City can assist residents by providing education and outreach, including the dissemination of fair housing information.

A. Homeownership-Private Sector Practices

The Fair Housing Act 42 states that it is "the policy of the United States to provide, within constitutional limitations, for fair housing throughout the United States."²⁴ The Act carries out the policy by prohibiting discrimination in the sale, rental, and financing of dwellings and in other real estate-related transactions because of race, color, religion, sex, familial status²⁵, national origin, or disability. This section of the AI discusses the City's efforts to determine and to evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents and property managers.

HOME PURCHASE PROCESS

When purchasing a home, a potential buyer must go through a process of steps, including:

- Search advertisements
- Obtaining a loan
- Working with a Real Estate Agent

B. Real Estate Advertisement

The process usually begins by searching for home for sale in advertisements. Homes for sale are advertised in magazines, newspapers, or the internet. Advertisements cannot include discriminatory references such as the use of words describing current residents, the neighborhood in racial or ethnic terms, that adults or types of adults are preferred, or convenience of local religious institutions.

Under 42 U.S. Code § 3604 (c), discrimination in the sale or rental of housing and other prohibited practices, it is unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

The National Fair Housing Alliance provides guidelines for responsible advertising to housing providers for their use. Basic guidelines they recommend include the following:

"Make sure your advertising is compliant with fair housing laws by focusing on the property and the amenities in your rental listing description—NOT on who you think an ideal renter would be."

"Do not make statements that exclude persons in protected classes or express a preference for one personal characteristic over others."

²⁴ 42 U.S.C. § 3601.

²⁵ One or more individuals under the age of 18 years living with a parent or other person having legal custody of the individual or individual.

Table 53 is from a sampling of 10 listings, one of which include potentially discriminatory language found at Trulia.com. The language could potentially target particular groups, rather than focusing solely on the amenities offered. The results were filtered to show homes affordable according to HOME and Housing Trust Fund Homeownership Sales Price Limits for fiscal year 2022, which is \$409,000 for 1-unit single family existing housing unit in Riverside County²⁶.

Table 53: Potentially Discriminatory Language in Listings of For-Sale Homes		
Discrimination Type	Number of Listings	Potentially Discriminatory Language*
No Discriminatory Language	4	
Income Related	3	(#4 in the heart of highly desirable Deep Canyon Tennis Club) (#9, Palm Valley Country Club community has amenities to satisfy even the most discerning visitors.)*
Household Size/Family Related	3	(#3 most in-demand retirement destinations, dream retirement home*), (#6 IDEAL family vacation home or a full-time residence.)* (#10, Close to shopping, dining, golf, schools and universities.)*

Source: www.trulia.com, accessed February 3, 2023.

*Examples are direct quotes from the listings (including punctuation and emphasis).

C. Home Loans

The next step is to obtain financing for the home purchase. The potential homebuyer must apply for the loan and the lender must perform an evaluation of credit quality, determine ability to repay the loan and amount eligible for, and choose the type and terms of the loan, etc. Examples of discrimination,²⁷ based on race, color, national origin, religion, sex, familial status, or disability, in lending can include:

- Refusal to make a mortgage loan
- Refusal to provide information regarding loans or providing unequal information
- Imposing different terms or conditions on a mortgage loan, such as different interest rates, points, or fees
- Discrimination in appraising property
- Steering an applicant toward a bad mortgage loan product
- Providing inferior servicing of a mortgage loan

D. Real Estate Agents

Real Estate Agents can discriminate in ways such as providing different terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics, or steering individuals with protected characteristics to a particular neighborhood or area at the exclusion of other areas.

²⁶ FY-2022-HOME-HTF-Homeownership-Sales-Limits.xlsx (live.com)

²⁷ U.S. Department of Housing and Urban Development, "Understanding Fair Lending," under "Lending Discrimination," <https://files.hudexchange.info/resources/documents/Fair-Lending-Learning-the-Facts-Consumer-Guide.pdf>.

E. Rental Housing Process

When searching for a home to rent, the process is somewhat similar to home purchase but does not require the same outlay of cash. Renting can involve the following steps:

- Search advertisements
- Viewing rental units
- Credit checks
- security deposits

F. Advertisement for Rental Units

As with searching for homes for sale, the process for rentals also begins by searching in advertisements, usually in magazines, newspapers, or the internet. Advertisements for rental units cannot include discriminatory references that indicate preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination. For the fiscal year of 2022, HUD's fair market rate, for the affordable rent for a two-bedroom unit was \$1,509 in the Riverside County²⁸.

For the fiscal year of 2023, HUD's fair market rate for the affordable rent for a two-bedroom unit is \$1,751 in Riverside County, CA²⁹. There were 0 results to reflect affordable rent for a two-bedroom unit using HUD's fair market rent on Trulia. The lowest rental amount for a two-bedroom was \$1,800. Other real estate databases were checked and produced the same results.

G. Fair Housing Complaints and Enforcement

Patterns of complaints and enforcement are useful to assess the nature and level of potentially unfair or discriminatory housing practices in the private sector. Several public and private agencies may receive complaints about unfair housing practices or housing discrimination.

OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)

At the federal level, the Office of Fair Housing and Equal Opportunity (FHEO) of the Department of Housing and Urban Development (HUD) receive complaints of housing discrimination. FHEO will attempt to resolve matters informally. However, FHEO may act on those complaints if they represent a violation of federal law and FHEO finds that there is "reasonable cause" to pursue administrative action in federal court.

CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING (DFEH)

At the state level, the Department of Fair Employment and Housing (DFEH) has a similar role to FHEO. DFEH also receives, investigates, attempts to settle, and can take administrative action to prosecute violations of the law. HUD and DFEH have overlap in jurisdiction, and depending on the nature of the case, may refer cases to one another. DFEH is a HUD Fair Housing Assistance Program (FHAP) grantee, meaning that it receives funding from HUD to enforce federal fair housing law in the state.

FAIR HOUSING COUNCIL OF RIVERSIDE, INC. (FHCRC)

²⁸ FY 2022 Final Fair Market Rents Documentation System — Select Geography ([huduser.gov](https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/select_Geography.odn))

²⁹ https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2023_code/select_Geography.odn

Locally, the FHCRC takes part in a variety of activities to fight housing discrimination, such as free educational workshops, outreach to the community, and the investigation of housing discrimination complaints. The capacity of the FHCRC enables it to provide fair housing information, outreach and enforcement to 24 cities and communities located in Riverside County plus the unincorporated area of the County.

FHCRC includes a total of 15 staff: two Housing Counselors, five Fair Housing Counselors, two Program Managers, Fair Housing Training Specialist, Program Administrator, an accountant, a controller, an Executive Director and an administrative staff member. FHCRC also has three interns.

The funding that supports the efforts of the FHCRC includes CDBG funds received from participating jurisdictions within its service area and grant funds such as HUD's Fair Housing Initiatives Program (FHIP) and Fair Housing Assistance Program (FHAP).

The FHCRC provides a full range of services, including:

- Anti-discrimination
- Landlord/tenant counseling
- First-time homebuyer seminars
- Foreclosure prevention
- Loan modification
- Back-to-Work FHA
- Training

Additionally, the FHCRC completed a Cultural Diversity Grant through the National Association of REALTORS (NAR) for the Inland Valleys Association of REALTORS (IVAR) members to attend the 2017 Housing Conference. FHCRC also is a continuing credit training agency through the Bureau of Real Estate (BRE), effective January 2017.

VII. Five Year Progress

The City completed its previous Analysis of Impediments in 2017. The analysis of data from the various sources, as described in the sections of this analysis, resulted in the identification of seven (7) impediments. The discussion below will include the impediment identified, goals to address the impediment, recommended actions, and City accomplishments. To illustrate the effectiveness or ineffectiveness of actions directly affects the accomplishments completed. Action steps were selected because they were deemed achievable by the City and its community. Each year during the previous five years, yearly progress was circulated to the community in the Consolidated Annual Performance and Evaluation Report (CAPER).

Table 54: Fair Housing Progress Since 2018		
Goal 1: Improve access to opportunity to low poverty neighborhoods		
Recommendation: Preventing Housing Discrimination		
	Actions	Progress
1.1	Continue to enforce the provisions of the Federal Fair Housing Act by continuing in funding a fair housing provider	<p>The City is contracting with the Fair Housing Council of Riverside County (FHCRC) and continues its referral program to the FHCRC and shall maintain information at City Hall and affordable housing complexes. Brochures and flyers are available at Housing Authority properties, Library, and apartment managers' offices.</p> <p>The City provides fair housing information on all its properties and continues to fund programs operated by the FHCRC. During the 2018-2022 planning period, the City used CDBG funds to provide the Council \$152,126 to eliminate discrimination in housing throughout the City in joint efforts across the County.</p> <p>Actions taken in FY2021-2022 are the FHCRC's landlord/tenant services are ongoing. Palm Desert residents received vital information regarding their housing rights, received mediation services and/or referrals for additional assistance. The top three issues/questions residents call in with had to do with notices, rental increases, and repairs. The education provided to tenants assists them in being knowledgeable of their rights and aware of the options that are available to them to resolve their housing disputes. FHCRC's anti-discrimination services are on-going. Individuals and/or households who call in with a discrimination complaint receive vital information regarding their housing rights, receive conciliation services, and/or referrals for additional services. The education provided to tenants on their fair housing laws assists them in being knowledgeable of their rights and aware of the options available to them when they feel they have been discriminated against.</p>
Goal 2: Increase the number of affordable units in the existing housing stock		

Recommendation: Make more units available in the City to accommodate those tenants on the County of Riverside Housing Authority extensive Section 8 waiting list		
2.1	Continue to provide rental assistance and encourage the construction of new affordable housing.	<p>The following programs are available in the City of Palm Desert:</p> <ol style="list-style-type: none"> 1. Housing Choice Voucher (Section 8) Assistance – The Riverside County Housing Authority administers the Housing Choice Voucher (HUD Section 8) rental assistance program to lower income renters within the City. 2. CalHFA First Mortgage Loan Programs – The California Housing Finance Agency (CalHFA) offers a variety of loan programs for low- and moderate-income first-time homebuyers who secure a CalHFA 30-year fixed mortgage. 3. CalHFA Down payment Assistance Program – Moderate income households may receive a deferred loan of up to the lesser of 3.5% of the purchase price or appraised value of a home, to be applied to the down payment and/or the closing costs for the residence, with a cap of \$10,000. 4. HomeChoice Program - This State program provides disabled low- and moderate-income households with a low-interest 30-year mortgage for a first-time homebuyer. 5. California Low-Income Housing Tax Credit Program – This competitive State program provides tax credits to private sector developers who provide affordable rental units within their projects. The units can consist of all or part of a project and must meet certain specified criteria. Units must be restricted for a period of at least 55 years.
Goal 3: Preserve the affordability of housing units that could convert to market rate housing		
Recommendation: Facilitate the purchase of the apartment communities by a nonprofit housing corporation, obtain Low Income Housing Tax Credits to rehabilitate the buildings, and thereby extend the affordability controls.		
3.1	The City shall continue to utilize restrictions, applicant screenings, and other appropriate mechanisms established as conditions of approval in order to preserve affordable for sale housing units for the long term.	Pursuant to Housing Element Program 6B, the City will annually coordinate with private development and management companies to promote the preservation of existing affordable housing units; and may cooperate through state and federal program funding for third party ownership, and other means to assure the long-term affordability of the project(s).
Goal 4: Increase the number of new affordable housing units that address the needs of families with children and disabled persons		
Recommendation: Have more housing available to better suit families and the disabled		
4.1	Coordinate with the Inland Regional Center, Desert Arc and other appropriate agencies and organizations that serve	The City has and will continue to encourage developers to reserve a portion of affordable housing projects for the disabled, including those with developmental disabilities. The City will support funding applications for such

	developmentally, physically disabled, including families with children population.	<p>projects and will consider fee waivers and reductions when these projects are proposed. The Housing Authority properties are one of the vehicles available to encourage rental to developmentally disabled individuals.</p> <p>The City has a no-fee application process for reasonable accommodation and assisted more than double the disabled residents between 2014 and 2020 (91 to 188 residents) in Housing Authority owned properties. The City does not impose any restrictions or barriers to the organic changes/movements in the community and will continue to approve and assist housing developments for disabled residents.</p> <p>The City has made progress in moving projects forward during the 2014-2021 planning period and will continue with the City's inventory and be carried forward into the 2022-2029 planning period. The Canterra Phase II, now known as The Sands, was entitled 388 units, including 78 reserved for very low-income households. The project entitlements remain active. The Housing Authority will market affordable housing projects as the one mentioned above, including Palm Desert 103, Dinah Shore and Portola, Carlos Ortega Villas, and Sagecrest Apartments.</p>
Goal 5: Increase the number of housing discrimination complaints filed with and processed by the Fair Housing Council of Riverside County, Inc. (FHCRC)		
Recommendation: Marketing of the FHCRC's services		
5.1	Promote and affirmatively further fair housing opportunities throughout the community for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (FEHA), Government Code Section 65008, and any other applicable state and federal fair housing and planning law.	Continue to provide multilingual brochures and informational resources to inform at least 10 residents, landlords, housing professionals, public officials, and other relevant parties annually 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.
Goal 6: Ensure that affordable housing sites are located in high opportunity neighborhoods		
Recommendation: Accessible to Housing for those families or individuals who can afford a home throughout the City		
6.1	The City shall continue to work with affordable housing organizations to preserve the affordability of the Regent Palm Desert, Shadow Hills Estates and Cantera Phase I.	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.
Goal 7: Increase the supply of housing designed to meet the needs of households with disabled members or other special needs		
Recommendation: Additional ADA accessible housing units and the Senior population		
7.1	The City shall continue to address the needs of senior population in development of housing; encourage the development of assisted living facilities for seniors; and continue to house physically and developmentally disabled residents	<p>City-owned housing communities continue to house senior residents in 7 projects totaling 366 units.</p> <p>City-owned housing communities continue to house physically and developmentally disabled residents, which have ranged from 91 to 188 residents in the last planning period.</p> <p>The City has actively participated in moving forward on the Arc Village Project, which will result in 32 units for developmentally disabled residents, in addition to the funds expended to make improvements to Desert Arc educational and vocational facilities.</p>

VIII. Actions

This chapter will discuss the findings from the Analysis of Impediments to Fair Housing Choice. The following are the major or high priorities that are the contributing factors to fair housing choice in the City of Palm Desert and include:

- Lack of affordable housing units that are at HUD's fair market rate
- High cost for rent
- Use of potential discriminatory language in advertisements for housing sale
- Increase in senior population
- Decrease in median home value

A. Recommendations for Ongoing Actions

The following findings are reiterations of impediments that were identified in the previous chapters of the Analysis of Impediments.

I. Lending Practices

Based on the data provided by the Home Mortgage Disclosure Act (HMDA) 2021, the Hispanic population in the City of Palm Desert submit the least number of applications for loans at 6.73% despite making up about 21.7% of the City's total population. As mentioned previously in the Lending Practice chapter, Table X: Demographics of Loan Applicants shows the percentage of applications submitted by racial/ethnic background in 2021. Each racial and ethnic category had a percentage that was almost proportionate to their population except for the Hispanic population. This can be due to the Hispanic population possibly not having access to purchasing homes like the other racial populations in the City, or also because of a language barrier.

Additionally, over 50% of applicants are within the upper income level bracket. Less than 10% of applicants are of moderate-income level. This can be another form of barrier because people of lower income levels usually need more financial help; however, they have less time or knowledge to access resources.

Note: Not in order of priority.

GOAL 1: SUPPORT NON-DISCRIMINATORY LENDING PRACTICES

Recommended Actions:

Provide financial literacy through public workshops and programs that involves lenders and the public working together and going through financial resources step-by-step that can help alleviate financial burden.

Provide resources in Spanish, the second most language spoken in the city for residents whose English proficiency is not strong.

Provide information about lending options on the City of Palm Desert's website both in English and Spanish so that information is easily accessible for the public.

B. Keep Existing Housing Affordable

As mentioned earlier in the Community Data chapter, about 32% of homes in the City of Palm Desert were built before 1978. This means that there is a high likelihood of these homes having lead-based paint. There is also a disproportionate number of renters that live in substandard housing compared to homeowners in the City. Additionally, the City's population has shown an increase by 7.4% over the past 20 years while the number of units in the City has only increased by 4.5%. If there are more people than homes this causes a supply and

demand issue in the housing stock, and the price for housing becomes more expensive because of the increase in competition.

GOAL 2: PRESERVE EXISTING HOUSING STOCK

Recommended Actions:

2.1 Continue the City's Home Improvement Program which provides emergency grants for households that qualify for a low-income AMI.

2.2 Continue and expand the Palm Desert Housing Authority's Authority Assisted Subsidized Rental Opportunities which subsidizes affordable rental units within the city.

2.3 Create a city-wide program that inspects units, especially rental units, that will combat issues of deterioration, substandard conditions that are maintenance related, and removal of lead-based paint.

2.4 Identify the 14,723 known vacant units (as of 2020) and rehab them for affordable housing.

C. Housing Discrimination

The Community Data chapter of the Analysis of Impediments goes over several aspects where renters disproportionately experience more fair housing burdens than their homeownership counterparts. There is a disproportionate number of renters that live in substandard housing compared to homeowners in the city. There is a higher number of renters experiencing overcrowding in their homes than renters. Under the Fair Housing chapter of the Analysis of Impediments, it was disclosed that there were six listings under www.trulia.com that utilized potential discriminatory language in their advertisements for for-sale homes.

GOAL 3: SUPPORT THE PREVENTION OF HOUSING DISCRIMINATION

Recommended Actions:

3.1 Provide educational workshops to the public regarding the Fair Housing Act.

3.2 Provide public events on a monthly or bi-monthly schedule where the public can interact personally with nonprofits and public agencies like the Habitat for Humanity, Valley-Wide Affordable Housing Opportunities, Palm Desert Housing Authority, bank lenders, and more. These events create a personal one-on-one connection and trust with organizations to go over concerns and/or questions they may have.

3.3 Provide translations on the City's website and resources like the Housing Authority Properties Brochure and Income Eligibility to ensure more accessibility for residents who are not proficient in English.

3.4 Educate and modify advertisements that use language that are discriminatory in regard to the sale of housing.

3.5 Increase public outreach to residents, especially renters, to build trust between the public and the Palm Desert Housing Authority. A stronger relationship where trust is built between the City Administration and the public allows the City to perform quickly and more accurately in knowing and resolving housing related issues that the public are facing.

D. Increase Homeownership

As mentioned earlier, the City's population is growing at a faster rate than the City's housing supply. The City needs to increase the number of housing units available to this growing population. Some of the policies above regarding rehabbing current housing units address this issue.

GOAL 4: SUPPORT HOME OWNERSHIP

Recommended Actions:

4.1 Incorporate programs into housing development that include: home ownership education, budgeting, and home maintenance education and skills.

4.2 Increase number of FHA loans, which as of 2021, make up 5.57% of loan applications through education and public outreach.

4.3 Continue and expand the Authority Assisted Home Ownership Opportunities program that is already in place.

E. Provide Opportunities for Affordable Housing

There is enough data to support throughout the Analysis of Impediments that explain the need for affordable housing for the City of Palm Desert.

GOAL 5: SUPPORT THE DEVELOPMENT OF AFFORDABLE HOUSING

Recommended Actions:

5.1 Create an Accessory Dwelling Units (ADUs) program in the city for single-family units to add additional affordable housing on existing housing properties. These ADUs will be partially subsidized for homeowners and be available for low-income tenants based on AMI.

5.2 Continue and expand the City's Developer Assisted Affordable Rental Opportunities that provide opportunities for developers to provide affordable units in their projects.

5.3 Continue to work with Habitat Humanity to proliferate the development of affordable housing throughout the City.

F. Recommended Actions for Other Impediments

The following impediments are also similar and related to impediments identified in the past. However, they recommended new approaches to ongoing issues such as lack of affordable housing are the most common findings.

I. Land Use Policies and Practices

The State of California requires cities to develop a General Plan Housing Element that addresses impediments to housing through land use policies. The General Plan is updated about every 20 years. The City of Palm Desert's City Council adopted the 2021-2029 Housing Element Update on September 29, 2022. The Housing Element Update covers twelve policies each with multiple programs to support the policy. Refer to the document link [2021-2029 Housing Element Update](#) starting on page 100 for the list of policies and programs.

GOAL 6: UPDATE LAND USE POLICIES AND PRACTICES TO FACILITATE DEVELOPMENT OF AFFORDABLE HOUSING

Recommended Actions:

- 6.1 Dedicate more affordable housing to senior living for the increase in aging population within the city.
- 6.2 Provide a city program that finances upgrades to housing units that accommodate for disability and age-related living conditions such as handrails, ADA ramps, widening doorways for wheelchair and strollers, and more.
- 6.3 Build a relationship with local tenant-based organizations that go over needs that tenants in low-income have that City is able to address.

G. Collaborating Regionally

The Analysis of Impediments has listed and provided evidence-based findings on how the city needs to improve its affordable housing supply and fair housing practices. This task does not have to be accomplished by the City of Palm Desert alone. Collaborating with other organizations regionally strengthens the city's ability to tackle these issues by incorporating people with specialties on the subject and providing more on the ground help.

GOAL 7: IMPROVE COLLABORATION WITH REGIONAL ORGANIZATIONS AND AGENCIES

Recommended Actions:

- 7.1 When conducting outreach, include County and other regionally based agencies and organizations such as Habitat Humanity.
- 7.2 Continue to hold regular meetings with organizations that serve the homeless as well as with governmental agencies to create awareness and collaboration.
- 7.3 Continue to ensure that service organizations have knowledge of each other's ongoing planning studies and initiatives such as the Continuum of Care and the Housing Authority of the County of Riverside.

Appendix A

Federal Fair Housing Laws

Appendix A – Federal Fair Housing Laws

- Title VI of the Civil Rights Act of 1964 (Title VI): Title VI is intended to protect the rights of individuals regardless of race, color, or national origin in programs and activities that receive federal funding or financial assistance.
- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act): The Fair Housing Act (adopted in 1968 and amended in 1988) prohibits housing discrimination against any of the following seven protected classes: Race, Color, Religion, Sex, National Origin, Familial Status, and Disability
 - As amended in 1988, the Fair Housing Act added "familial status" and "disability" as protected classes and increased HUD's authority to establish mandatory enforcement measures to ensure compliance with federal law.
- Section 504 of the Rehabilitation Act of 1973 (Section 504): Section 504 established guidelines that prohibit individuals with disabilities from being denied access to housing under programs and activities that receive federal funding or financial assistance.
- Section 109 of Title I of the Housing and Community Development Act of 1974 (Section 109): Section 109 prohibits housing discrimination based on race, color, national origin, sex, or religion under programs and activities that receive federal funding or financial assistance.
- Title II of the Americans with Disabilities Act of 1990 (Title II): Title II prohibits discrimination based on disability under programs, services, and activities provided by public entities. HUD is responsible for enforcement of Title II when it is associated with public housing, housing assistance, and housing referrals administered by state and local jurisdictions.
- Architectural Barriers Act of 1968 (Architectural Barriers Act): The Architectural Barriers Act mandates that buildings and facilities that received federal funding assistance after September 1969 be accessible to and functional for handicapped individuals.
- Age Discrimination Act of 1975 (Age Discrimination Act): The Age Discrimination Act prohibits programs or activities that receive federal funding from discriminating against individuals on the basis of age, unless such discrimination is authorized by federal, state or local laws.
- Title IX of the Education Amendments Act of 1972 (Title IX): Title IX prohibits educational programs or activities that receive federal funding or financial assistance from discriminating against individuals on the basis of sex.
- In addition to federal fair housing laws that guarantee equal access to housing, a number of presidential executive orders were also issued to minimize discrimination and barriers to obtaining housing.
- In 1988, disability and familial status (the presence or anticipated presence of children under 18 in a household) were added (further codified in the Americans with Disabilities Act of 1990).^[5] In certain circumstances, the law allows limited exceptions for discrimination based on sex, religion, or familial status.
- In 2017, a federal judge ruled that sexual orientation and gender identity are protected classes under the Fair Housing Act. As of May 2018, there is an additional pending effort to amend the Fair Housing Act to make this explicit (HR 1447).

Appendix B – Community Outreach

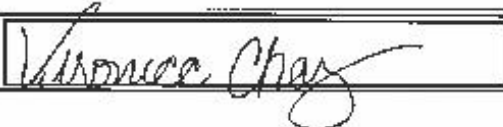
Appendix B

Community Outreach

Grantee SF-424's and Certification(s)

View Burden Statement		OMB Number: 4040-0004 Expiration Date: 11/30/2026	
Application for Federal Assistance SF-424			
1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		3. Revision, select appropriate remark: <input type="text"/> Other (Specify): <input type="text"/>	
4. Date Received: 09/27/2021		5. Applicant Identifier: <input type="text"/>	
6a. Federal Entity Identifier: <input type="text"/>		6b. Federal Award Identifier: 8-21-HC-UG-0584	
State Use Only:			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
B. APPLICANT INFORMATION:			
a. Legal Name: CITY OF PALM DESERT			
b. Employer/ taxpayer Identification Number (EIN/TIN): 05-2857455		c. UEI: JC2H1V4V1C044	
d. Address:			
Street1: Street2:		13510 CRESCENT DRIVE	
City: County/Parish:		PALM DESERT	
State: Province:		US - California	
Country: Zip/Postal Code:		USA: UNITED STATES 92263 0001	
e. Organizational Unit:			
Department Name: FINANCE DEPARTMENT		Division Name: FINANCE DEPARTMENT	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: Middle Name: Last Name: Suffix:		First Name: JOE BARRON	
Title: Senior Contracts and Grants Analyst			
Organizational Affiliation: <input type="text"/>			
Telephone Number: 760.776.6451		Fax Number: <input type="text"/>	
Email: bbarron@palmdesert.gov			

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.218"/>	
CFDA Title: <input type="text" value="COMMUNITY DEVELOPMENT BLOCK GRANT"/>	
* 12. Funding Opportunity Number: <input type="text" value="5-11-HC-00-0554"/>	
* Title: <input type="text" value="COMMUNITY DEVELOPMENT BLOCK GRANT"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Download Attachment"/> <input type="button" value="Delete Attachment"/> </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="THE CITY OF PALM DESERT COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM FOR FISCAL YEAR 2023-2024"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Download Attachments"/> <input type="button" value="Delete Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="CA-CSE"/>	* b. Program/Project: <input type="text" value="CA-CSE"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment 1"/> <input type="button" value="View Attachment 1"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2023"/>	* b. End Date: <input type="text" value="06/30/2024"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL:	<input type="text" value="300,000.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12972 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12972 Process for review on <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12972 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12972.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text"/>	* First Name: <input type="text" value="VERONICA"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="CHAVEZ"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="FINANCIAL DIRECTOR"/>	
* Telephone Number: <input type="text" value="760-776-6344"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="mchavez@palmdesertc.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="08/21/2023"/>

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0345-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in the application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to secure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 600, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§280 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11991; (d) evaluation of flood hazards in floodplains in accordance with EO 11984; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Palm Desert	06/23/2023

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Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) **2023** (a period specified by the grantee of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

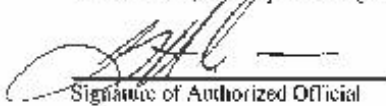
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701n) and implementing regulations at 24 CFR Part 75



Signature of Authorized Official



Date

City Manager
Title

Compliance with Anti-discrimination Laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.


Signature of Authorized Official

6/24/23
Date

Finance Director
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.206(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature of Authorized Official


Date

Finance Director
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature of Authorized Official

6/24/23
Date

Finance Director
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.


Signature of Authorized Official

6/26/23
Date

Finance Director
Title

Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.


Signature of Authorized Official

6/26/23
Date

Finance Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Appendix - Alternate/Local Data Sources

1	Data Source Name Point in Time Count/Survey
	List the name of the organization or individual who originated the data set. County of Riverside, Department of Public Social Service, Homeless Unit
	Provide a brief summary of the data set. Provides basic information on sheltered and unsheltered homeless persons.
	What was the purpose for developing this data set? Required information for homeless which is provided by the Continuum of Care (CoC).
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The information is basic in nature and does not cover all categories requested in Table 25.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Based on 2011 Homeless Point in Time Count/Survey.
	What is the status of the data set (complete, in progress, or planned)? Complete