

Palm Beach Gardens Analysis of Impediments to Fair Housing Choice

Prepared in Support of Palm Beach Gardens'
Consolidated Plan

Prepared for the City of Palm Beach Gardens
by Carras Community Investment, Inc.

December 29, 2015



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I. Introduction

The Analysis of Impediments to Fair Housing Choice (AI) for the City of Palm Beach Gardens was conducted by Carras Community Investment, Inc., a private community and economic development consulting firm. As a recipient of Community Development Block Grant (CDBG) entitlement funding from the US Department of Housing and Urban Development (HUD), the City of Palm Beach Gardens is required to identify impediments or barriers to fair housing choice and work to address those barriers.

A. Basis of this Study

Under the Fair Housing Act, the US Department of Housing and Urban Development (HUD) is obligated to administer its programs in such a way as to “affirmatively further fair housing” (AFFH), a requirement that extends to grantees of HUD programs. The Community Development Block Grant (CDBG) program specifically contains a regulatory requirement that entitlement jurisdictions certify that they will affirmatively further fair housing as a condition of the receipt of that funding. This obligation to AFFH, requires the jurisdiction to pursue the following broad objectives:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities;
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act

Specifically, the AFFH obligation requires the grantee to:

- 1) Conduct an analysis to identify impediments to fair housing choice within the jurisdiction
- 2) Take appropriate actions to overcome the effects of any impediments identified through the analysis
- 3) Maintain records reflecting the analysis and actions in this regard.

While the obligation to AFFH arises in connection to the receipt of HUD funds, the obligation extends beyond the operation of HUD-funded programs and applies to all public and privately funded housing and housing-related activities in the jurisdiction.

B. Overview of Fair Housing Laws

The first housing discrimination protections were established with the Civil Rights Act of 1866, which held that “all citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property.” While by statute, the Act bans discrimination on the basis of race or color, through case law, it has been determined to prohibit discrimination on the basis of national origin and religion as well. The Act, however, went largely unenforced.

To address the continuing unequal access to housing, particularly for racial minorities, Congress passed Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, which prohibits discrimination in housing based on race, color, religion, and national origin. The Fair Housing Act was amended in 1974 to include sex as a protected class and in 1988 to include disability and familial status.

Fair housing laws apply to all housing related transactions including real estate sales, rentals, mortgage lending, homeowner’s insurance, zoning and housing-related harassment. The Fair Housing Act specifically identifies prohibited practices in §3604, §3605, §3606 and §3617. These prohibited practices include:

- To refuse to sell or rent, to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of their membership in a protected class.
- To discriminate against any person in the terms, condition, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of their membership in a protected class.
- To make, print, or publish, any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected class.
- To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that a unit is not available for inspection, sale, or rental when such dwelling is in fact so available.
- To refuse to permit a reasonable accommodation or modification for a person with a disability when such an accommodation or modification is necessary to afford such person equal opportunity to use and enjoy a dwelling.
- A failure to design and construct multi-family housing to meet accessibility standards.

While discrimination can occur overtly, such as a landlord stating that they will not rent to a family with children, the law also covers practices that are less direct. One such area is differential treatment. For example, a landlord cannot apply a more stringent application process to members of a protected class.

Another category of practices covered under the law is disparate impact. These are practices that are seemingly neutral yet have a disproportionate negative impact on members of a protected class. For example, a landlord may institute a policy that they will only accept income from work to verify that someone is qualified to rent a unit, however this practice could have a disproportionate effect on people with disabilities or women with children who receive child support. Regardless of the landlord's intent, the discriminatory effect of these practices would constitute a violation of fair housing laws. Under these provisions, a range of historical practices that have the effect of limiting access to housing for members of protected classes have been interpreted to be illegal under the Fair Housing Act. These include racial steering, exclusionary zoning, blockbusting, discriminatory advertising, and redlining in mortgage, insurance and appraisals.

The Fair Housing Act provides an administrative process to investigate complaints and pursue legal action on behalf of victims of discrimination. Individuals may file administrative complaints with HUD or the Broward County Office of Human Rights which is considered a substantially equivalent agency. Complaints filed with HUD are referred to the Division of Human Rights for investigation.

If Fair Housing violations are proven, victims are eligible for monetary compensation and affirmative relief. Injured parties, including organizations, may also file civil cases on their own in state or federal court.

C. Defining Analysis

Impediments to fair housing choice are those factors which may preclude an individual or family from living where they would freely choose to live, or which cause them to live under less favorable circumstances than equal treatment under the law would dictate. In other words, absent barriers which relate to federal and state fair housing laws, these individuals or families would reside elsewhere and/or be free of negative circumstances which accrued to them through unfair housing practices.

The Analysis of Impediments to Fair Housing Choice seeks to identify not only if these prohibited practices are present within a community, but also looks broadly at housing and housing-related issues. Impediments to fair housing are not merely acts of discrimination, but any factor that limits the access to housing opportunities for members of protected classes. Thus, an impediment could be a discrete act of discrimination such as a landlord's refusal to rent to someone with a mobility impairment. Impediments can also be a broad public policy, or lack of public policy, such as the failure of a municipality to ensure an adequate supply of accessible, affordable housing for people with disabilities. As defined by HUD, impediments to fair housing choice are:

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

To identify impediments, the AI involves conducting a comprehensive review of the jurisdiction's laws, regulations, and administrative policies, procedures, and practices; an assessment of how those laws, etc. affect the location, availability, and accessibility of housing; and an assessment of conditions, both public and private, affecting fair housing choice.

According to new guidance recently put forth by HUD under a proposed Affirmatively Furthering Fair Housing rule, a fair housing review should seek to use data and community input to do the following:

- Identify integration and segregation patterns and trends across protected classes within the jurisdiction and region;
- Identify racially or ethnically concentrated areas of poverty within the jurisdiction and region;
- Identify whether significant disparities in access to community assets exist across protected classes within the jurisdiction and region; and
- Identify whether disproportionate housing needs exist across protected classes within the jurisdiction or region. Based on this review, the Analysis should seek to identify and prioritize fair housing issues, identify the most significant determinants related to these issues, and establish goals for addressing the determinants.

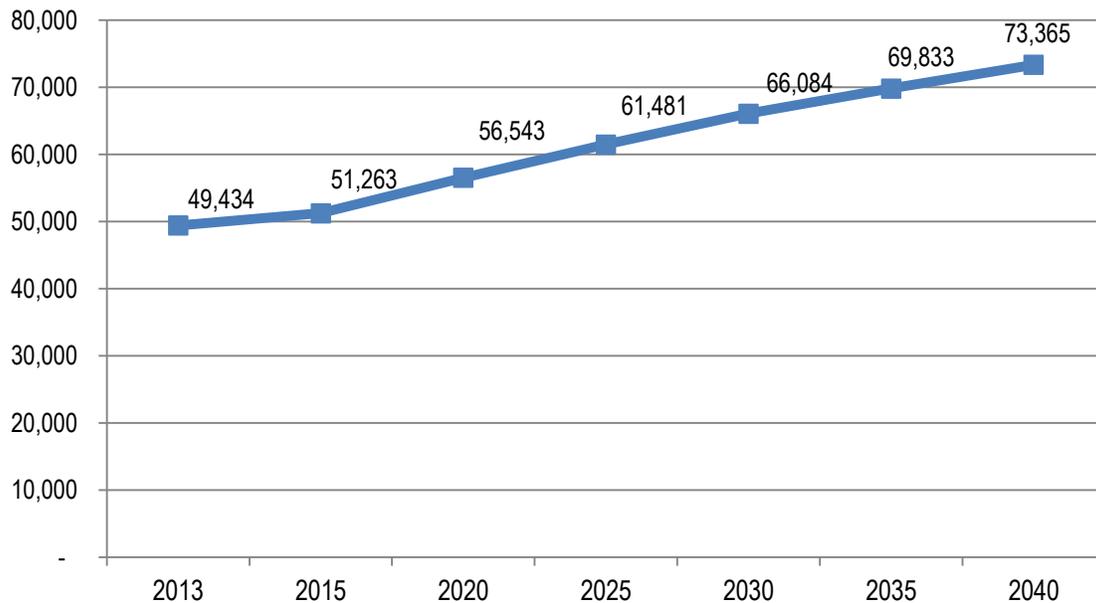
II. Community Profile

A. Demographic Summary

The Bureau of Economic and Business Research estimates the City of Palm Beach Gardens' population was 50,067 in 2014. The City's population has increased by nearly 1,627 residents (3%) since the 2010 Census population count of 48,440.

According to the latest five-year American Community Survey (ACS), the City's approximate population was 49,273 between 2009 and 2013. The Florida Housing Data Clearinghouse anticipates the City's population will grow by at least 19% (10,218 residents) between 2015 and 2025, from 51,263 to 61,481 residents.

Figure: Population Projections, Palm Beach Gardens



Source: Florida Housing Data Clearinghouse, 2015

B. Population, Race, and Ethnicity: Growing Diversity

According to the 2009-2013 ACS, the population of Palm Beach Gardens is approximately 49,273, of which 22,420 (46%) are male and 26,853 (54%) female. The City's median age is 48.

For people reporting one race alone, 87% or 43,141 identified as White, 5% or 2,627 as Black or African American, 3% or 1,428 as Asian, and less than 0.5% as American Indian

and Alaska Native. Approximately 2%, or 972 residents, identified as two or more races. 11% or 5,436 residents identified as Hispanic or Latino.

In the decade between the 2000 and 2010 Census, the City’s population became more diverse. For persons reporting one race, the White population decreased from 94% in 2000 to 91% in 2010, while the City’s African American population nearly doubled from 2% of the total population to 4%. Within this timeframe, the City’s Hispanic population increased by 2,341 residents.

Table: Racial Demographics, Palm Beach Gardens

	2000		2010	
	Number	% Of Total	Number	% Of Total
Not Hispanic or Latino	33,085	94.4%	44,138	91.1%
White	32,878	93.8%	43,267	89.3%
Black or African American	806	2.3%	2,133	4.4%
American Indian	38	0.1%	79	0.2%
Asian	754	2.2%	1,506	3.1%
Pacific Islander	11	0.0%	18	0.0%
Other Race	235	0.7%	662	1.4%
Two or More Races	336	1.0%	787	1.6%
Hispanic or Latino	1,973	5.6%	4,314	8.9%
Total	35,058	100%	48,452	100%

Source: U.S. Census Bureau, 2000 and 2010 Census

Fair Housing Issue Analysis

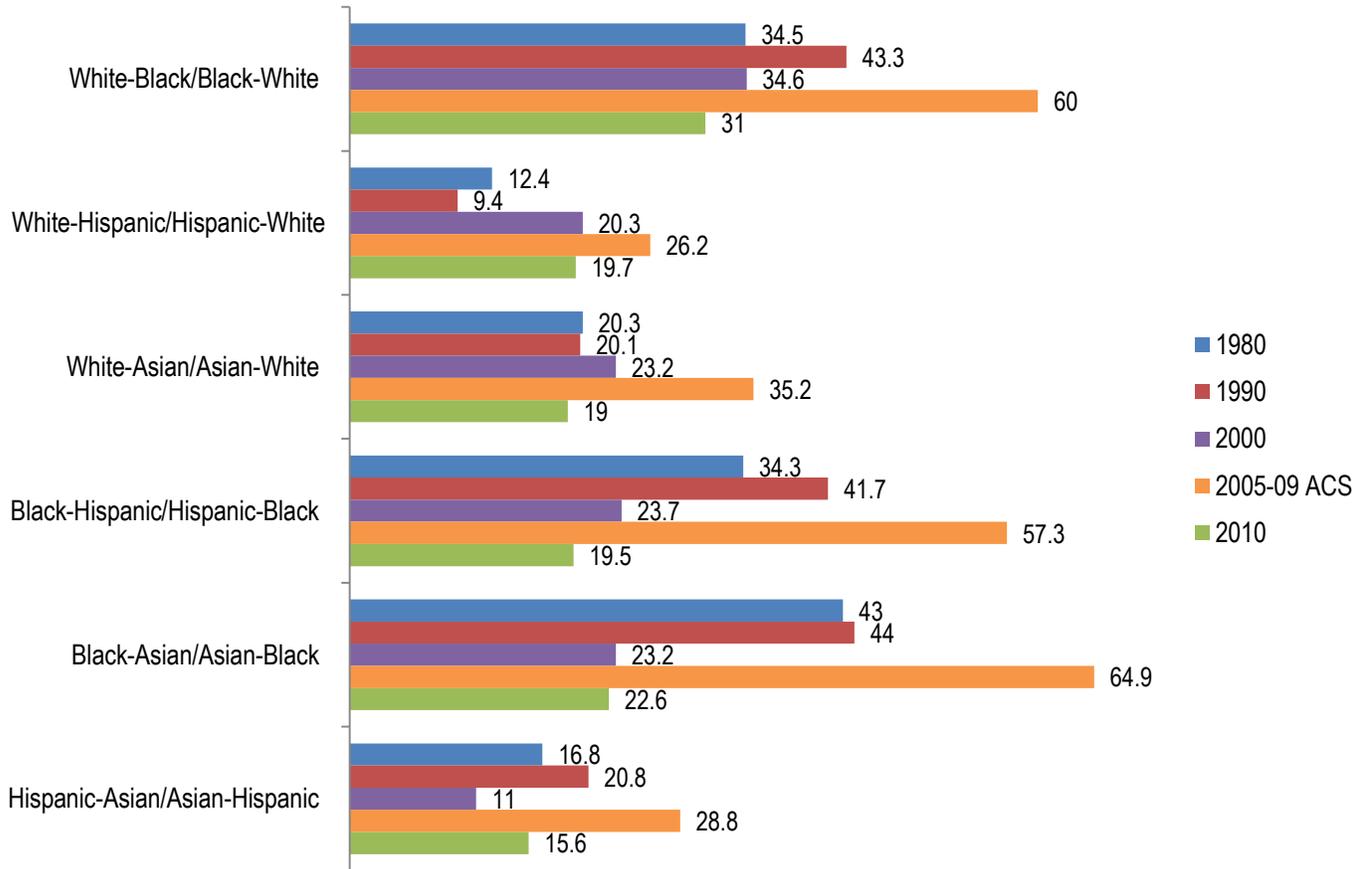
C. Segregation/Integration

A primary metric for identifying segregation is the Dissimilarity Index. A Dissimilarity Index measures whether one particular group (frequently a racial or ethnic group) is distributed across census tracts in a jurisdiction in the same way as another group. A high value indicates that the two groups tend to live in different census tracts.

Values of 60 or higher are considered very high while values of 30 or below are considered to be fairly low. Values of 40 or 50 are usually considered a moderate level of segregation. It is important to note that the index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group’s members are evenly distributed throughout the area.

According to Brown University’s Spatial Structures in the Social Sciences (S4) initiative, the City of Palm Beach Gardens exhibited a lower level of White-Black segregation in 2010. S4’s data indicates that White-Black segregation in the City fluctuated between 1980 and 2010.

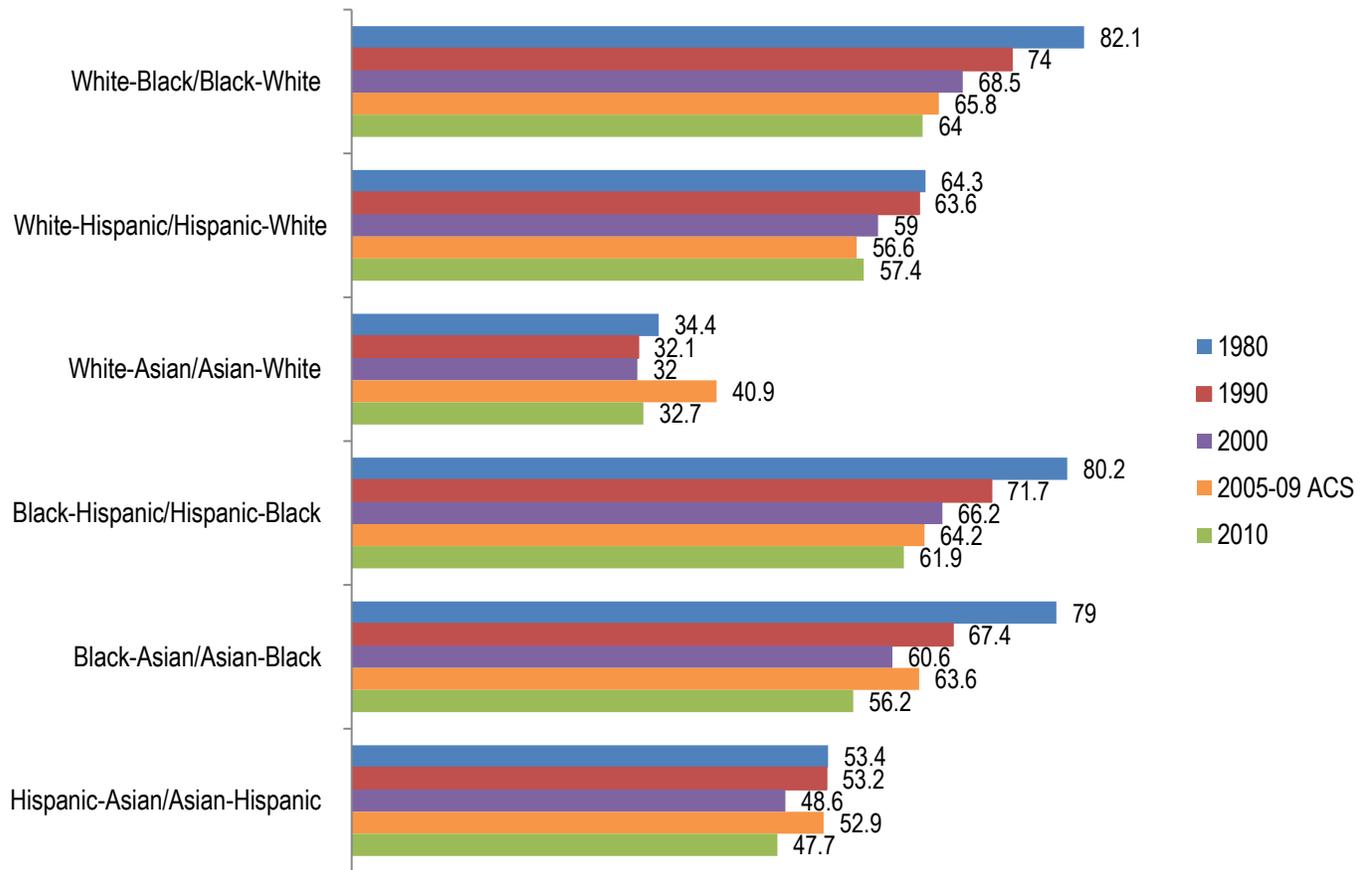
Figure: Dissimilarity Index, City of Palm Beach Gardens



Source: Brown University, Spatial Structures in the Social Sciences, US2010

The level of White-Hispanic and White-Asian segregation in Palm Beach Gardens has remained mostly low between 1980 and 2010. Black-Hispanic segregation was at 19.5 in 2010, a 43% decrease from the City’s 1980 level for those groups. Both Hispanic-Asian and Black-Asian segregation remained at low levels in 2010. Black-Asian segregation in the City showed a 47% decrease between 1980 and 2010 while Hispanic-Asian segregation has remained consistently low during this period.

Figure: Dissimilarity Index, Miami – Fort Lauderdale – Pompano Beach Metropolitan Statistical Area (MSA)



Source: Brown University, Spatial Structures in the Social Sciences, US2010

Overall, the City of Palm Beach Gardens shows consistently lower levels of segregation when compared to the region. The level of White-Black segregation in 2010 was 51% higher for the Miami Metropolitan Statistical Area (MSA) than in the City that same year. While the segregation levels in the Miami MSA have been mostly high or moderate, there have sizable decreases between 1980 and 2010 among various groups.

Of the census tracts within or partially within or near Palm Beach Gardens, none of the census tracts contained a high concentration of minorities (<60%) in 2015 according to the Federal Financial Institutions Examination Council (FFIEC). As of 2015, none of the tracts in or near Palm Beach Gardens qualify as underserved or distressed.

Table: FFIEC Census Report – Summary Census Demographic Information, 2015

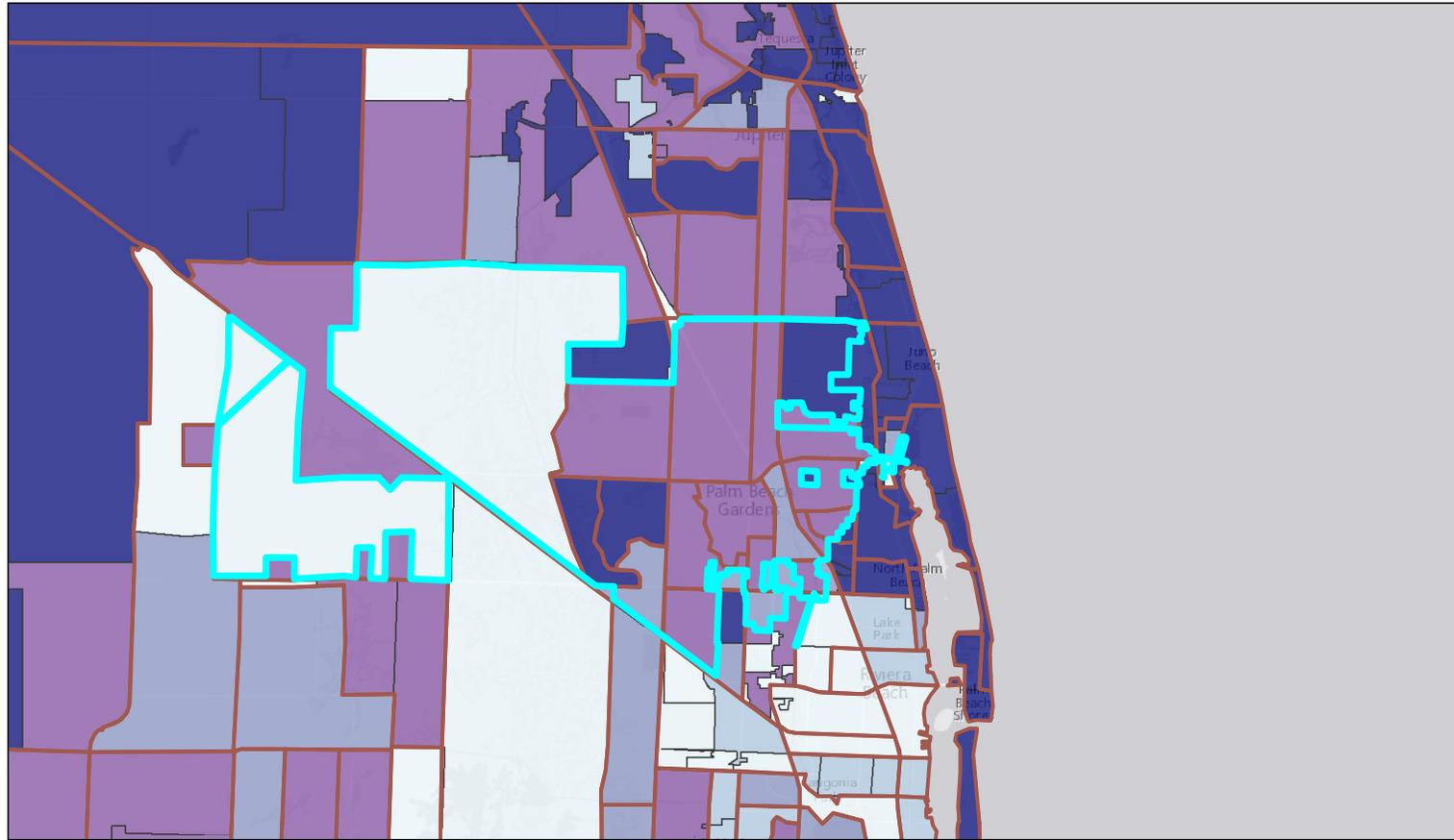
Tract Code	Tract Income Level	Distressed or Underserved	2015 Est. Tract Median Family Income	Tract Population	Tract Minority %	Minority Population
2.08	Upper	No	\$97,292	3,960	13.26	525
2.09	Middle	No	\$73,168	6,140	20.31	1,247
3.03	Upper	No	\$136,316	4,575	6.8	311
3.04	Middle	No	\$58,553	5,469	26	1,422
5.07	Upper	No	\$199,172	1,098	4.1	45
6	Middle	No	\$60,357	1,466	20.4	299
7.03	Upper	No	\$99,518	3,903	13.55	529
8.02	Moderate	No	\$46,073	2,621	29.91	784
8.03	Upper	No	\$86,311	3,089	11.91	368
8.04	Middle	No	\$72,065	2,775	17.66	490
9.02	Middle	No	\$73,538	2,571	23.26	598
9.03	Middle	No	\$59,027	4,972	31.82	1,582
9.04	Upper	No	\$82,696	3,706	25.04	928
9.05	Middle	No	\$69,625	4,101	22.46	921
10.03	Upper	No	\$99,446	4,679	34.13	1,597
10.04	Moderate	No	\$44,846	4,715	39.24	1,850
13.01	Moderate	No	\$40,906	5,003	90.51	4,528
78.14	Upper	No	\$169,701	2,090	7.99	167
78.28	Upper	No	\$88,348	1,362	15.57	212
78.3	Upper	No	\$97,850	3,584	10.02	359
78.31	Upper	No	\$88,452	3,809	23.05	878
78.35	Upper	No	\$160,290	3,767	14.95	563
9802	Unknown	No	\$0	13	30.77	4

Source: FFIEC, 2015

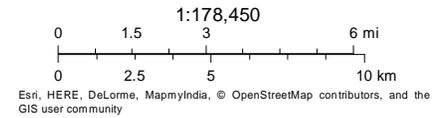
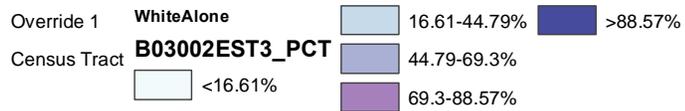
The following maps show the distribution of racial and ethnic groups in the City of Palm Beach Gardens by census tract boundaries.

The maps indicate very little clustering of racial groups in certain census tracts. The demographic information in these maps is based on data from the 2005-2009 ACS.

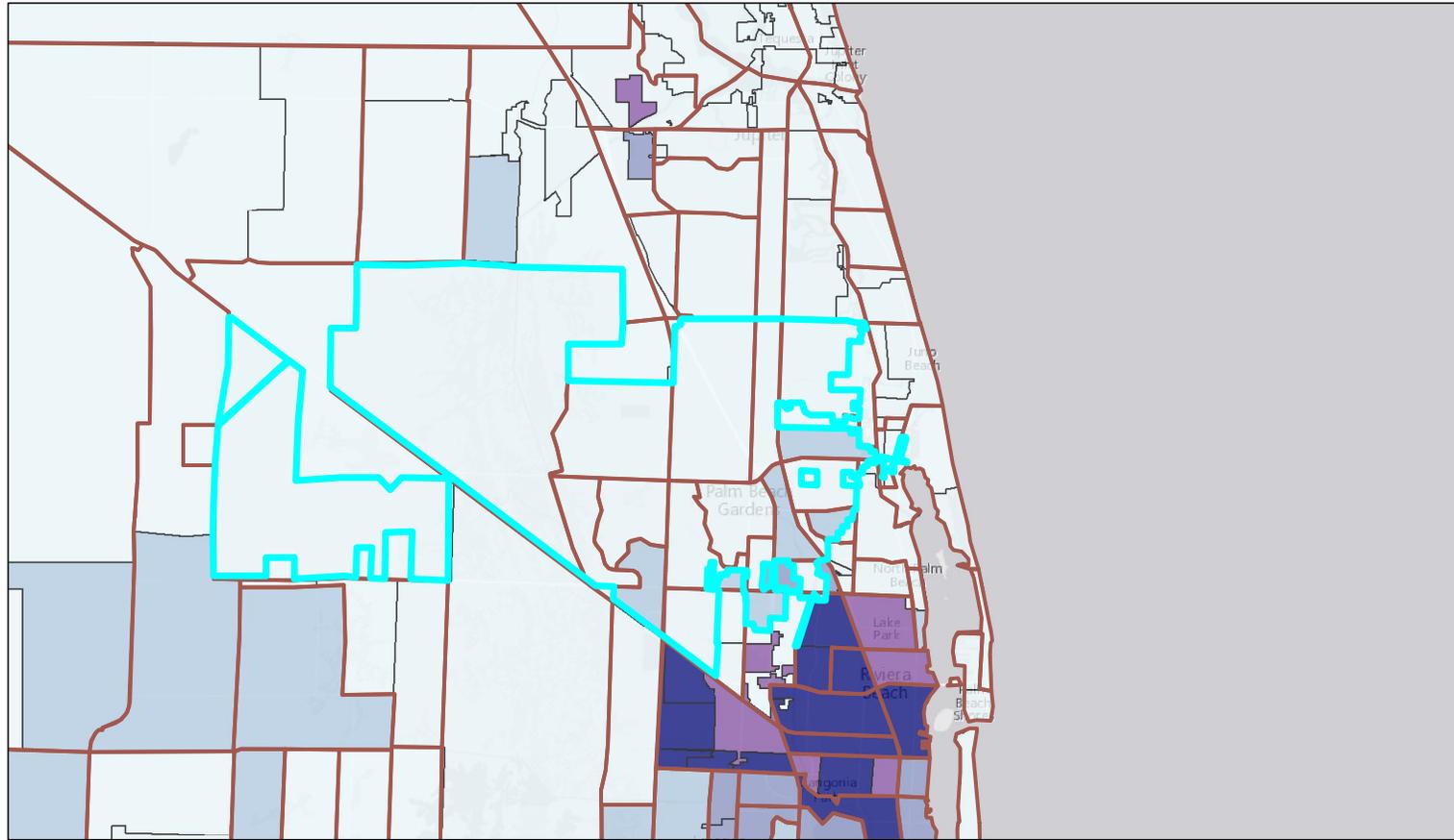
Percentage of Whites, Palm Beach Gardens - CPD Maps



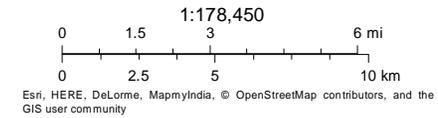
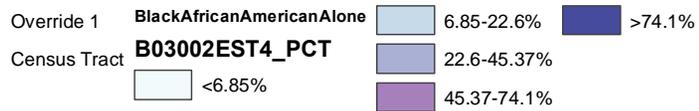
August 27, 2015



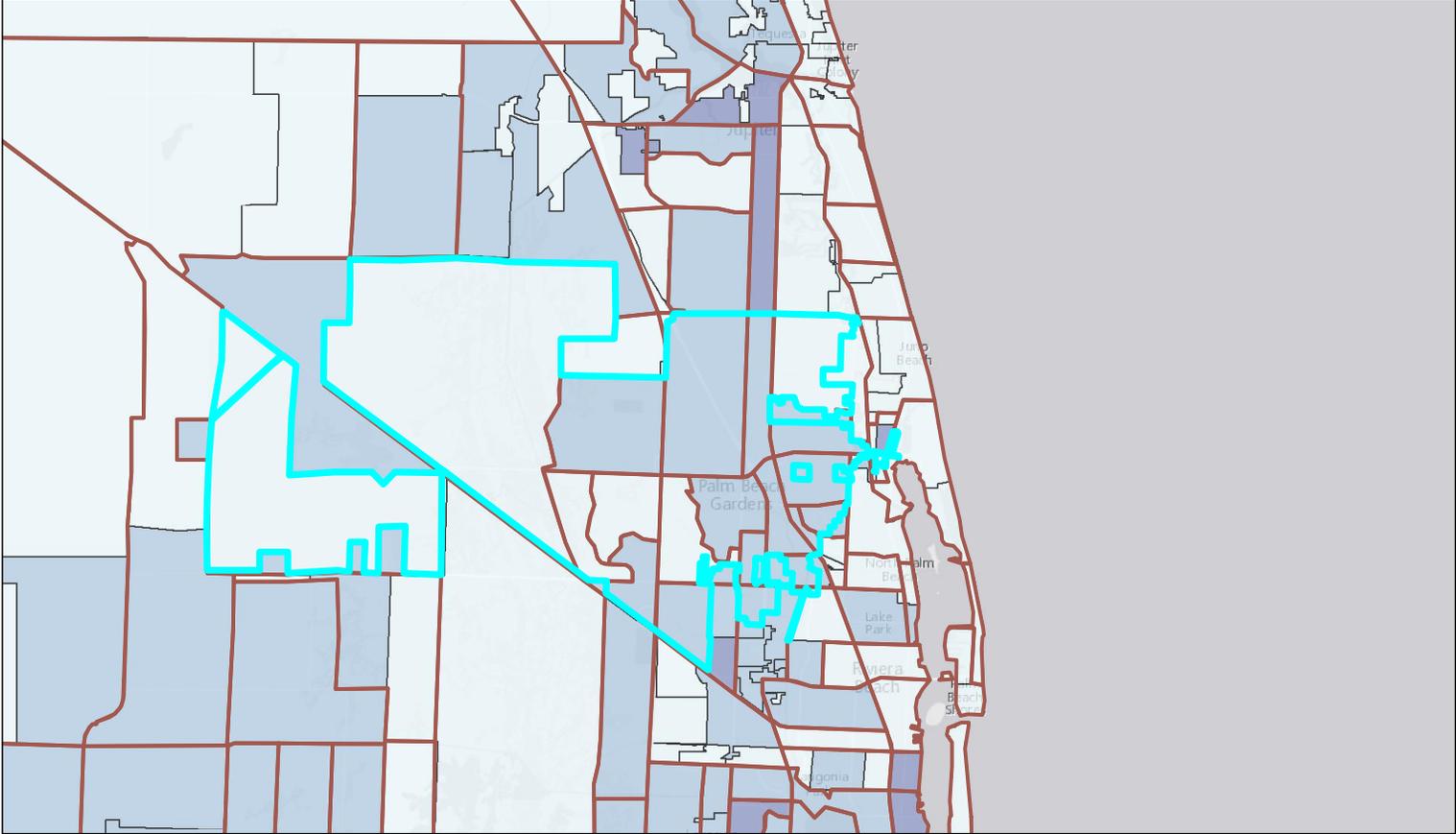
Percentage of Blacks/African Americans, Palm Beach Gardens - CPD Maps



August 27, 2015



Percentage of Hispanics, Palm Beach Gardens - CPD Maps



August 27, 2015

Override 1	HispanicOrigin		7.12-23%
Census Tract	B03002EST12_PCT		23-46.54%
			<7.12%

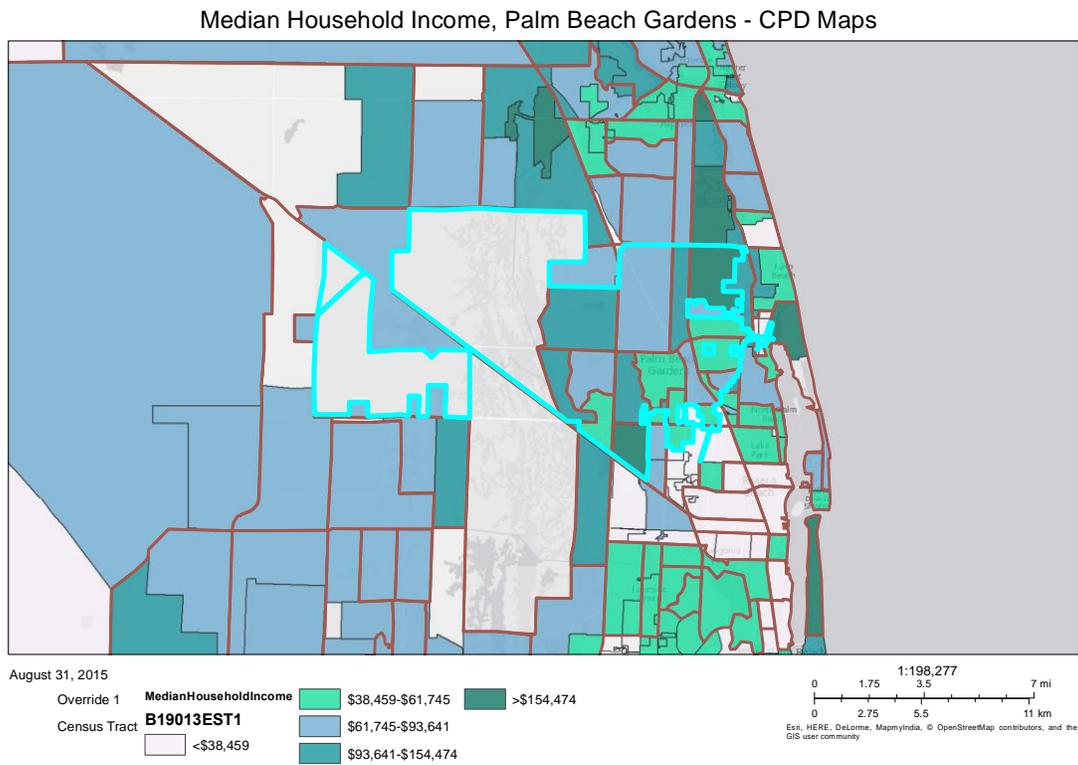


As of 2015, the City does not contain any racially/ethnically-concentrated areas of poverty (RCAP/ECAP) within the jurisdiction.

D. Income, Education, and Employment

According to the 2009-2013 ACS, the median household income in Palm Beach Gardens was \$66,000, which is higher than the median household income for Palm Beach County (\$52,432) and Florida (\$46,956).

The map below shows the median income household by census tract within the City based on the 2005-2009 ACS.



The FFIEC’s Summary Census Income information for the City of Palm Beach Gardens in 2015 is shown below. This outline includes the estimated poverty rate, median family income, and household income by census tract. Of the 23 census tracts within, partially within, or near Palm Beach Gardens, 12 tracts qualified as Upper-income, 3 Moderate-income, 7 Middle-income, and 1 was unknown. Median family income in almost every tract within or partially within the City increased between 2010 and 2015.

Table: FFIEC Census Report – Summary Census Income Information, 2015

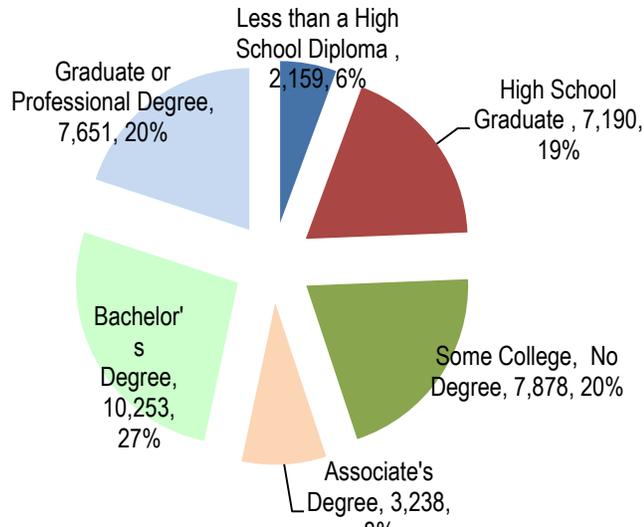
Tract Code	Tract Income Level	% Below Poverty Line	Tract Median Family Income %	2010 Tract Median Family Income	2015 Est. Tract Median Family Income	2010 Tract Median Household Income
2.08	Upper	3.51	149.91	\$96,615	\$97,292	\$92,768
2.09	Middle	2.21	112.74	\$72,656	\$73,168	\$66,098
3.03	Upper	1.48	210.04	\$135,363	\$136,316	\$101,141
3.04	Middle	6.61	90.22	\$58,147	\$58,553	\$56,398
5.07	Upper	1.6	306.89	\$197,778	\$199,172	\$167,500
6	Middle	10.44	93	\$59,938	\$60,357	\$40,878
7.03	Upper	5.91	153.34	\$98,824	\$99,518	\$87,161
8.02	Moderate	18.55	70.99	\$45,750	\$46,073	\$45,327
8.03	Upper	4.16	132.99	\$85,707	\$86,311	\$64,212
8.04	Middle	3.44	111.04	\$71,563	\$72,065	\$64,700
9.02	Middle	2.86	113.31	\$73,026	\$73,538	\$72,379
9.03	Middle	11.16	90.95	\$58,616	\$59,027	\$42,457
9.04	Upper	6.99	127.42	\$82,120	\$82,696	\$69,462
9.05	Middle	5.37	107.28	\$69,141	\$69,625	\$59,088
10.03	Upper	4.59	153.23	\$98,750	\$99,446	\$89,474
10.04	Moderate	24.47	69.1	\$44,535	\$44,846	\$42,304
13.01	Moderate	23.71	63.03	\$40,625	\$40,906	\$35,120
78.14	Upper	3.09	261.48	\$168,512	\$169,701	\$99,779
78.28	Upper	15.54	136.13	\$87,731	\$88,348	\$80,46
78.3	Upper	2.04	150.77	\$97,169	\$97,850	\$81,280
78.31	Upper	13.59	136.29	\$87,837	\$88,452	\$59,227
78.35	Upper	3.06	246.98	\$159,167	\$160,290	\$114,647
9802	Unknown	0	0	\$0	\$0	\$0

Source: FFIEC, 2015

According to the 2009-2013 ACS, 94% of people 25 years old and over in the City had completed high school or higher, compared to 87% in Palm Beach County and 86% in Florida.

47% of City residents have a Bachelor’s degree or higher, compared to 32% in Palm Beach County and 26% in Florida.

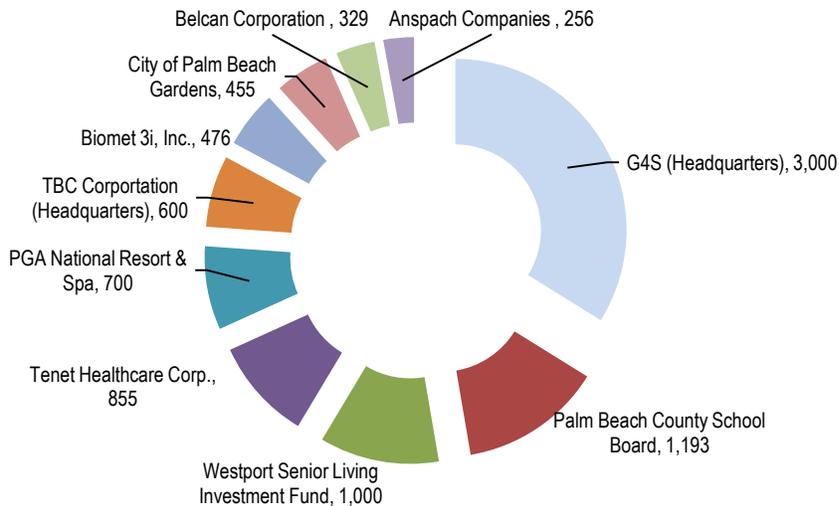
Figure: Educational Attainment, Palm Beach Gardens



Source: American Community Survey, 2009-2013

The map on page _ shows the estimated percentage of people with at least a Bachelor's degree in the City between 2009 and 2013 by census tract. Tracts 2.08, 3.303, 8.03 9.05, 78.14, 78.30, and 78.35 show a high percentage (< 42%) of people 25 years and older with a Bachelor's, graduate, or professional degree.

Figure: Principal Employers, Palm Beach Gardens

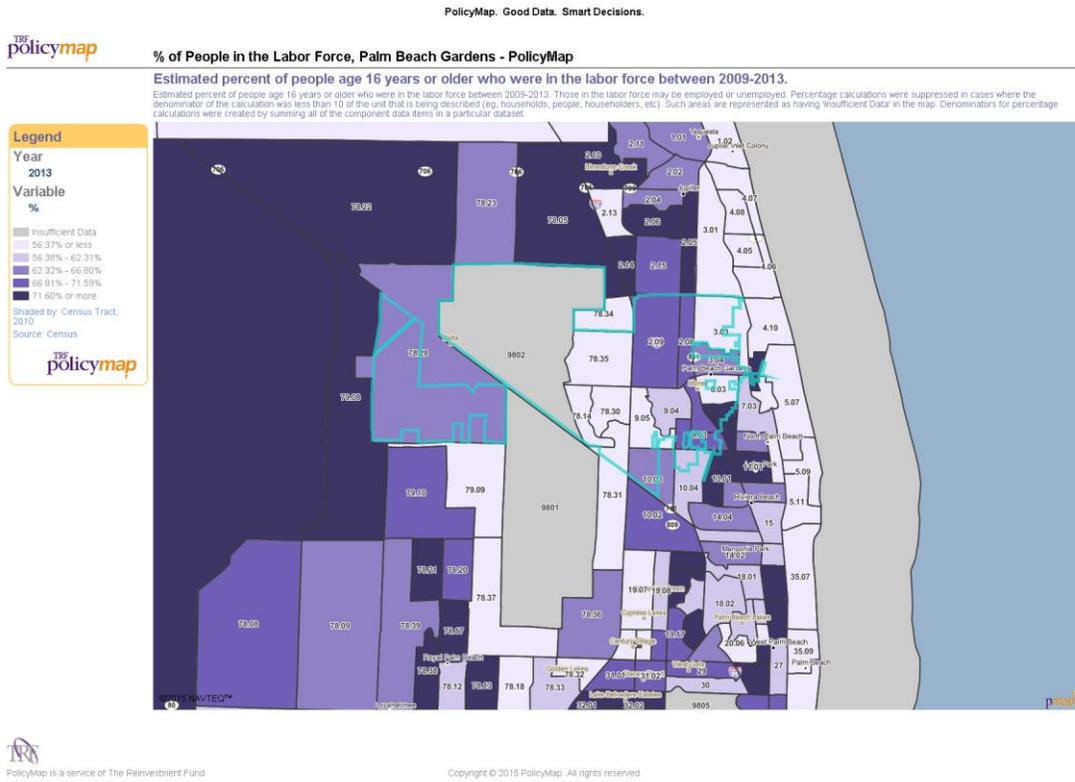


Source: City of Palm Beach Gardens Comprehensive Annual Financial Report, 2014

The City's top 10 employers are shown in the figure above. In 2014, these principal employers made up nearly 36% of total City employment with 8,864 employees.

The latest five-year ACS data estimates that the total civilian population in the City is 22,977. Most of the City's workers (83% or 19,245) earn a private wage and salary according to the 2009-2013 ACS. 6% are self-employed and nearly 9% are government workers.

The map below shows the estimated percentage of people 16 years or older who were in the labor force in the City between 2009 and 2013.



According to the 2009-2013 ACS data, some of the leading industries in Palm Beach Gardens include: educational and health care services (23%), professional, scientific, management, and administrative and waste management services (15%), and arts, entertainment, and recreation, and accommodation and food services (13%).



% of People with at Least a Bachelor's Degree, Palm Beach Gardens - PolicyMap

Estimated percent of people with at least a Bachelor's degree between 2009-2013.

Estimated percent of population 25 years and older with a Bachelor's degree, graduate, or professional degree between 2009-2013. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc). Such areas are represented as having 'Insufficient Data' in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.

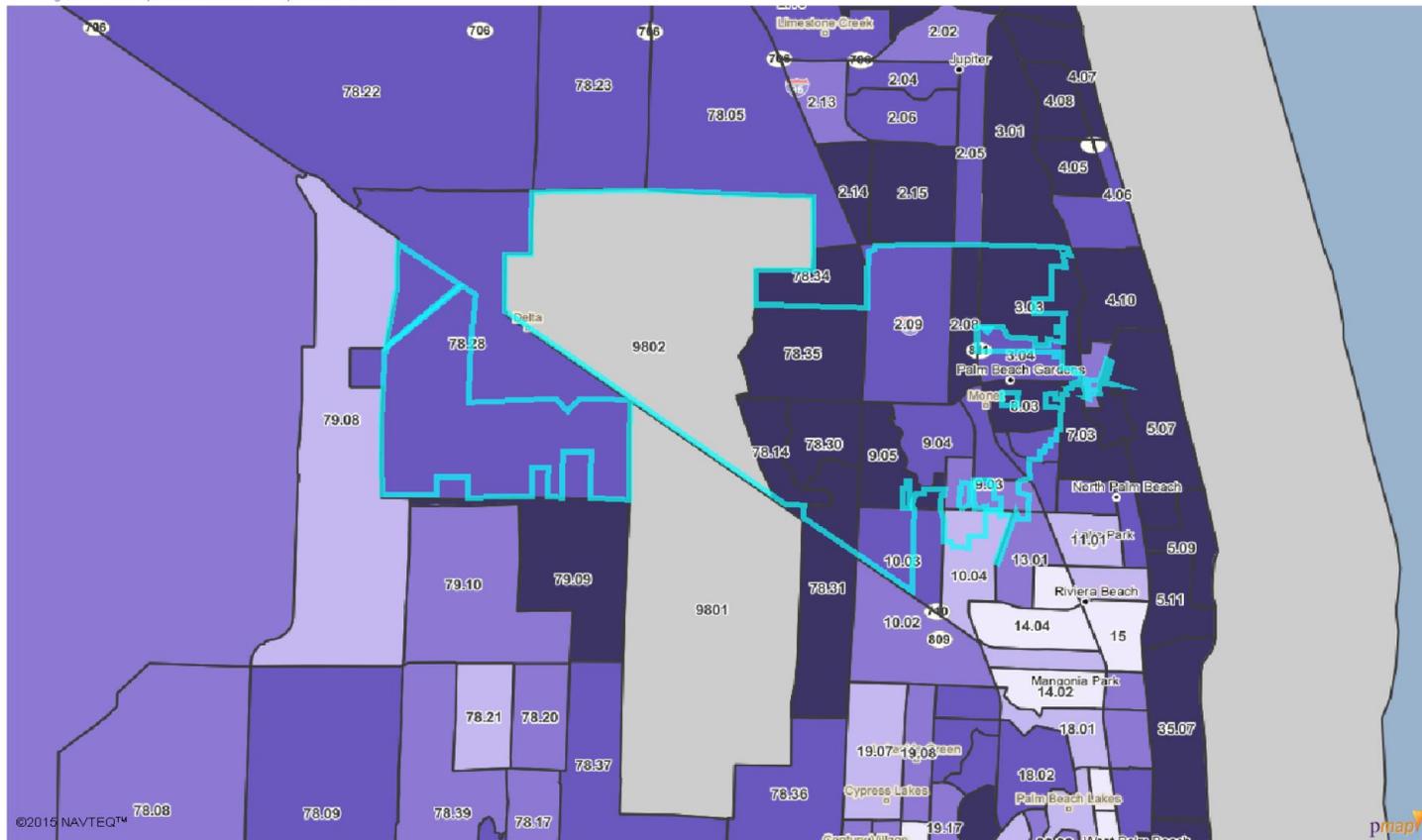
Legend

Year
2013

Variable
%

- Insufficient Data
- 12.04% or less
- 12.05% - 18.55%
- 18.56% - 27.62%
- 27.63% - 42.68%
- 42.69% or more

Shaded by: Census Tract, 2010
Source: Census

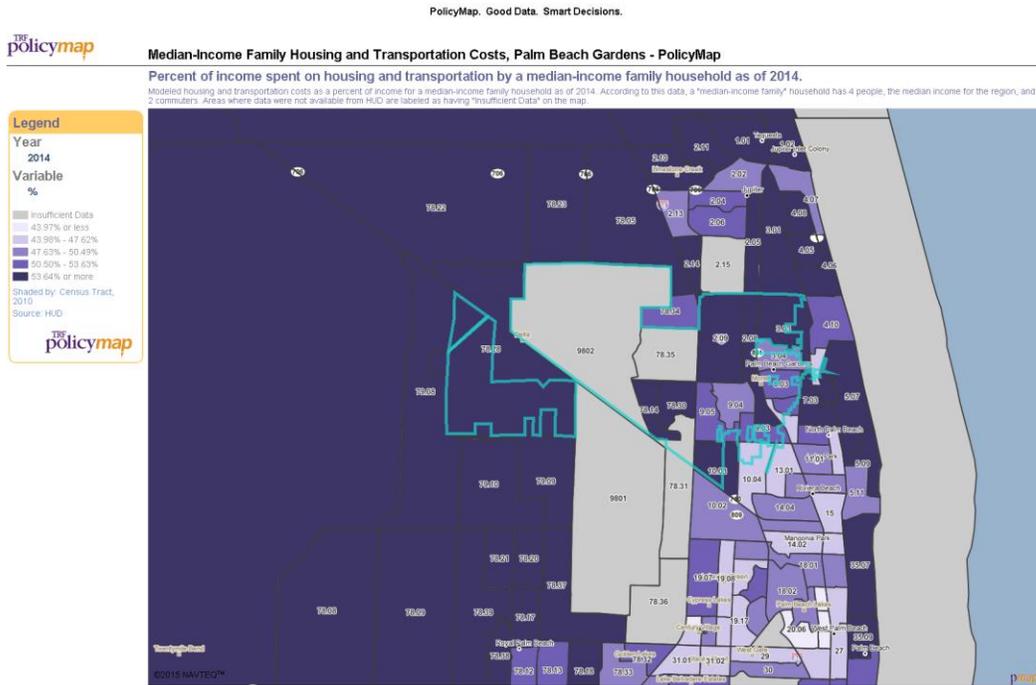


E. Transportation and Commuting

According to the latest five-year ACS data, 81% or 18,387 workers in Palm Beach Gardens commute to work alone while less than 1% (61 workers) used public transportation and 1,643 (7%) worked at home.

Census data further indicates that the mean travel time to work in the City (20 minutes) is less than Palm Beach County's (24 minutes) and Florida's mean travel times (25 minutes).

HUD's Location Affordability Index (LAI) estimates the percentage of a family's income dedicated to the combined cost of housing and transportation in a given area. The City's LAI for a median-income family of four is 59%, which is higher than the region's combined burden of 55% for the same type of household. The index estimates that the average costs of housing and transportation as a percent of income for a median-income family in Palm Beach Gardens is 34% or \$16,518 for housing costs and 25% or \$12,146 for transportation costs. The LAI also indicates that tract 3.03 has the highest combined housing and transportation cost-burden (98%) in the City for a median-income family.



PolicyMap is a service of The Reinvestment Fund

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The map above from PolicyMap shows the percent of income spent on housing and transportation by a median-income family household in the City as of 2014. The map shows a higher combined cost-burden (<53%) in tracts 2.08, 2.09, 3.03, 9.02, 10.03, 78.14, 78.28, and 78.30

F. Housing Supply: Providing Housing Options

Of the City’s existing housing supply (27,844 total housing units), 66% of units are single-family structures, 32% are in multifamily structures, and 1% are mobile homes. The City’s estimated vacancy rate is 6% for rentals and 4% for single-family properties, according to the latest five-year Census data.

According to the 2009-2013 ACS, 20% (5,612 units) of the City’s total housing units are vacant. Of the 22,232 occupied housing units in Palm Beach Gardens, approximately 72% (16,093) is owner occupied and 28% (6,139) is renter occupied. Comparable 2009-2013 ACS figures for Palm Beach County indicate 71% (374,397) of occupied units are owner occupied and 29% (151,610) are renter occupied.

Table: Housing Tenure, Palm Beach Gardens

Housing Tenure	Number of Units	% Of Total
Owner Occupied	16,093	72%
Renter Occupied	6,139	28%
Total Occupied Housing Units	22,232	100%

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

Table: Type of Housing, Palm Beach Gardens

Type of Housing	Number of Units	% Of Total
Single Family (detached and attached)	18,407	66%
Duplex	368	1%
Multifamily (3 or more units)	8,758	32%
Mobile Home	311	1%
Other	0	0%
Total	27,844	100%

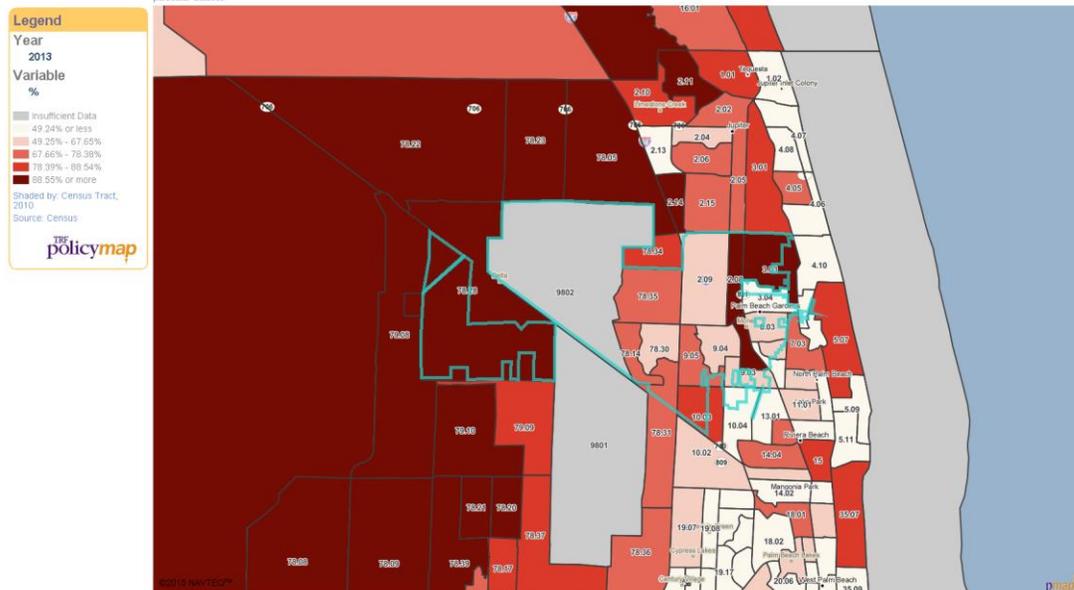
Source: American Community Survey, 2009-2013



% of Single Family Homes, Palm Beach Gardens - PolicyMap

Estimated percent of housing units that are single family homes between 2009-2013.

Estimated percent of housing units that are one unit housing units between 2009-2013. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (eg, households, people, householders, etc). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.



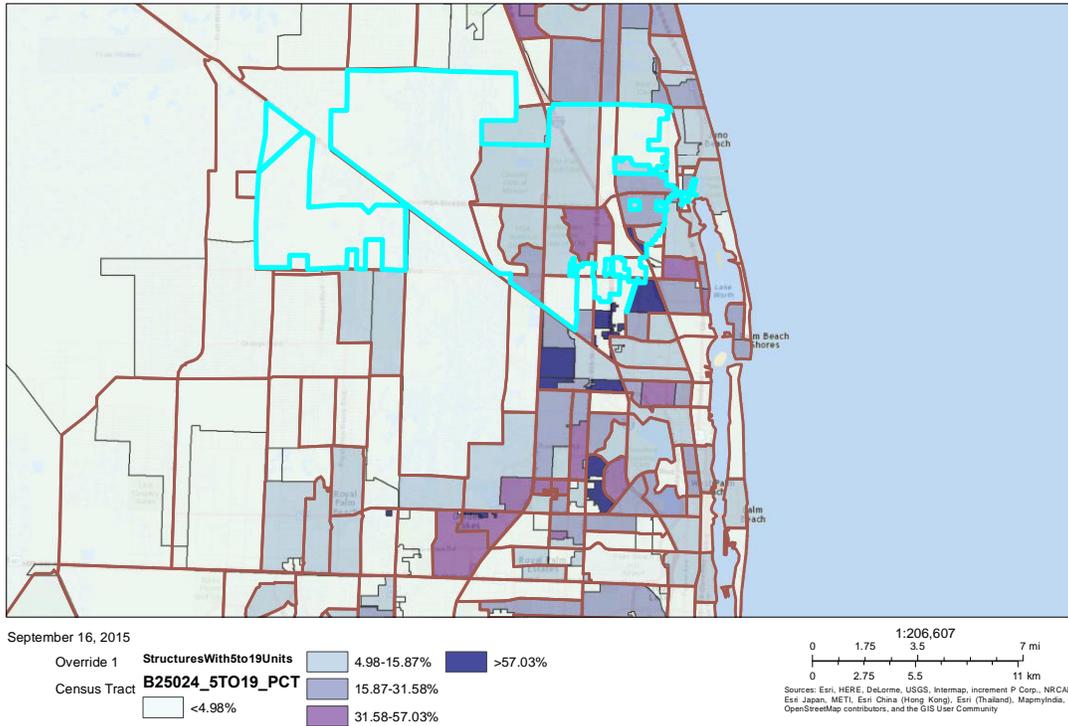
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The map above shows the estimated percentage of housing units in the City that are in single-family homes by census tract between 2009 and 2013. According to the map, over 90% of the housing units in tracts 2.08, 3.03, and 9.02 are one-unit properties.

The map below outlines by census tract the percentage of structures with 5-19 units. Tract 8.02 shows the highest percentage (71%) of structures with 5-19 units in the City.

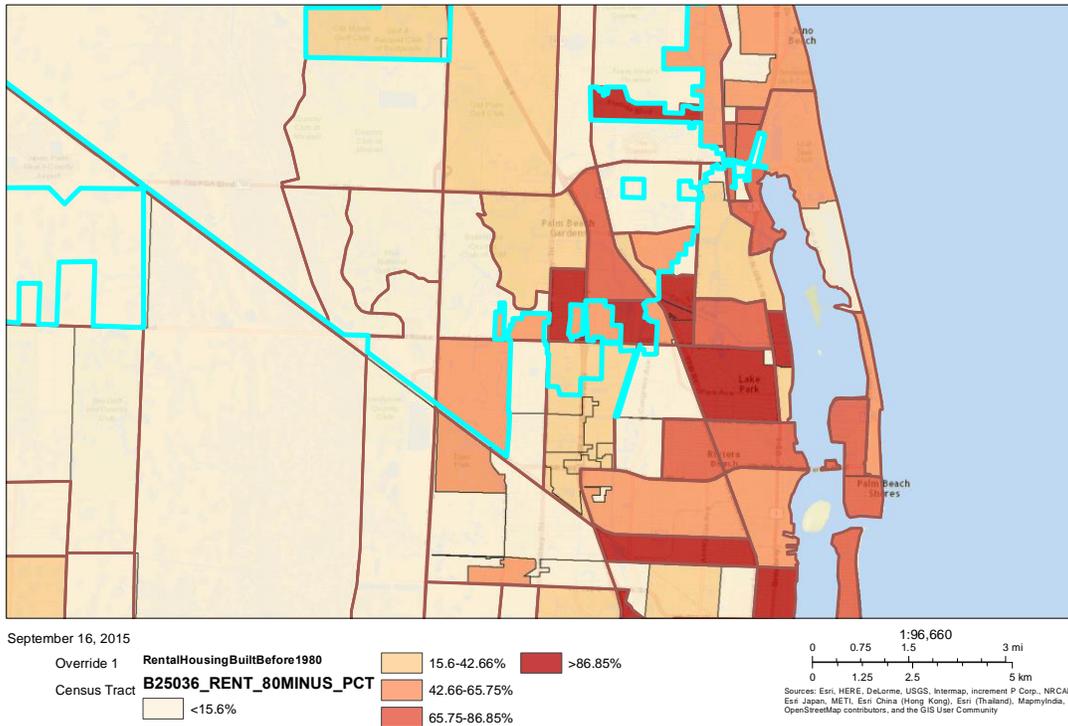
% of Structures with 5-19 units, Palm Beach Gardens - CPD Maps



Approximately 32% (8,857 units) of the City’s housing stock was built between 2000 and 2009. Nearly 22% (6,270 units) of the City’s units were built between 1990 and 1999, 25% (7,019 units) were built between 1980 and 1989, and 12% (3,485 units) were built between 1970 and 1979.

The map below shows the distribution of rental housing built before 1980 in the City by census tract. According to CDP Maps, tract 9.03 has the highest percentage (94%) of housing built before 1980 in the City.

% of Rental Housing Built Before 1980, Palm Beach Gardens - CPD Maps



G. Housing Affordability

Housing costs totaling more than 30% of a family’s monthly income are generally considered not affordable, since this leaves inadequate funds to cover other necessities such as food, clothing, education, and health care.

The Florida Housing Data Clearinghouse estimates that 41% or 9,657 households in the City qualified as cost-burdened in 2013. By comparison, 43% of households qualified as cost-burdened statewide that year. 20% or 4,696 households in Palm Beach Gardens are spending more than 50% of income for housing.

Table: Households by Homeowner/Renter Status and Cost-Burden, 2013

Household Income	Amount of Income Spent on Housing		
	0-30%	30-50%	50% or more
Owner	10,578	3,112	3,169
Renter	3,045	1,849	1,527

Source: Florida Housing Data Clearinghouse, 2015

Table: Households by Income and Cost-Burden, 2013

Household Income by Area Median Income (AMI)	Amount of Income Spent on Housing		
	0-30%	30-50%	50% or more
<=30% Area Median Income	162	164	1,740
30.01-50% Area Median Income	328	677	1,142
50.01-80% Area Median Income	1,210	1,657	1,039
80.01+% Area Median Income	11,923	2,463	775
Total	13,623	4,961	4,696

The HUD-estimated median income in Palm Beach Gardens and the surrounding metro area for a family of four is \$64,900 in 2015.

Source: Florida Housing Data Clearinghouse, 2015

Of the City's 2,066 extremely low-income households (30% AMI or less), most (84% or 1,740) are severely cost-burdened. 53% or 1,142 of the City's 2,147 low-income households (30-50% AMI) are severely cost-burdened. Of the City's 3,906 moderate-income households (50-80% AMI), 42% or 1,657 households are spending between 30-50% of their income on housing costs and 27% are severely cost-burdened. Most of the City's households earning more than 80% AMI are spending less than 30% of their household income on housing costs.

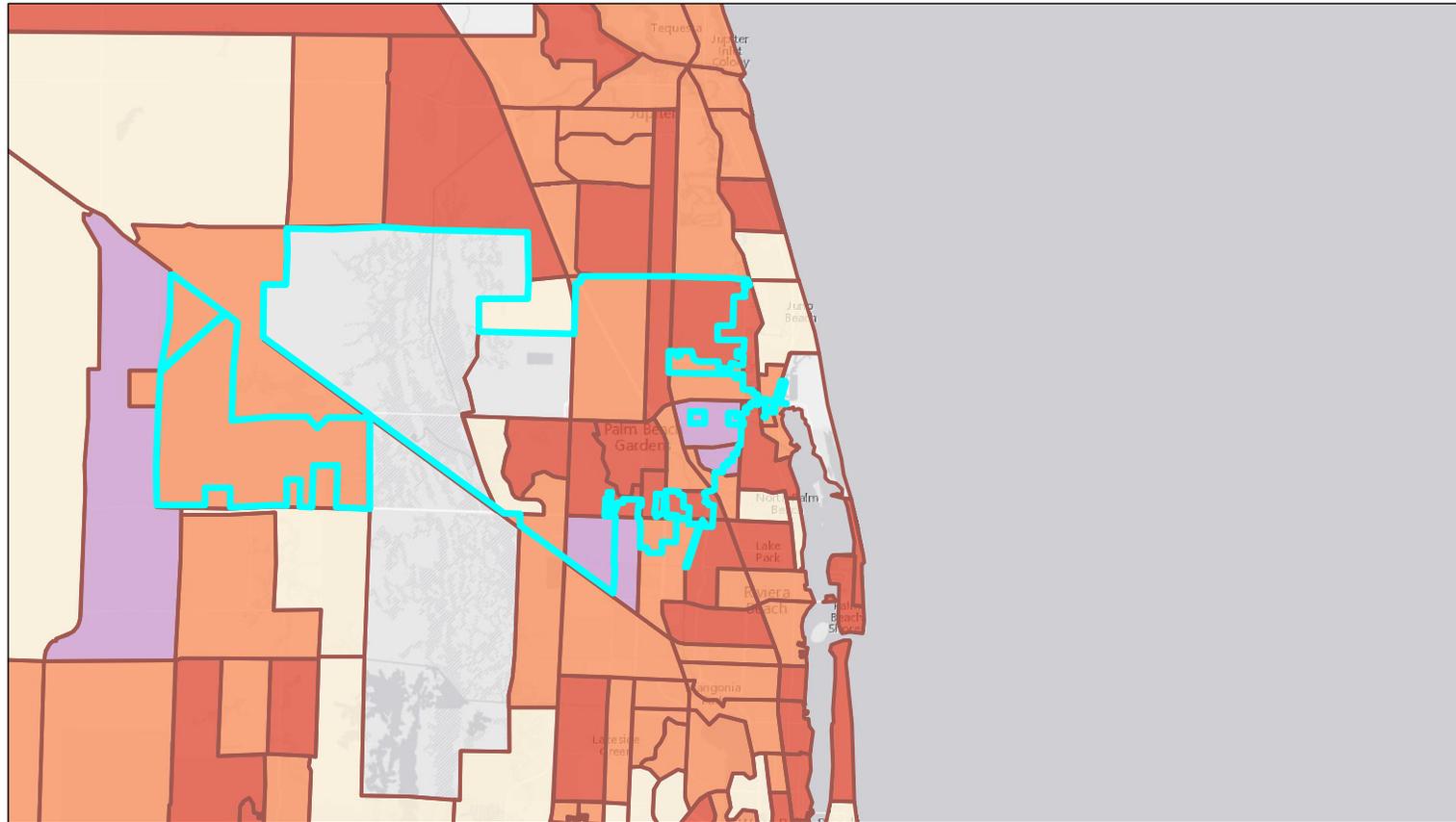
Table: Rental Rate, Palm Beach Gardens

Monthly Gross Rent	Number of Units	% Of Total
Less than \$200	0	0%
\$200 to \$299	30	0.5%
\$300 to \$499	63	1.1%
\$500 to \$749	121	2.0%
\$750 to \$999	490	8.3%
\$1,000 to \$1,499	3,275	55.3%
\$1,500 or more	1,938	32.8%
Total	5,917	100%
Median Rent	\$1,355	-
No rent paid	222	X

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

According to the 2009-2013 ACS data, the median rent in Palm Beach Gardens is \$1,355. This is comparable to the median rent in Palm Beach County (\$1,149) and is higher than the median rent in Florida (\$990).

Change in Median Rent, Palm Beach Gardens - CPD Maps



September 30, 2015

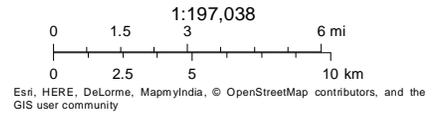
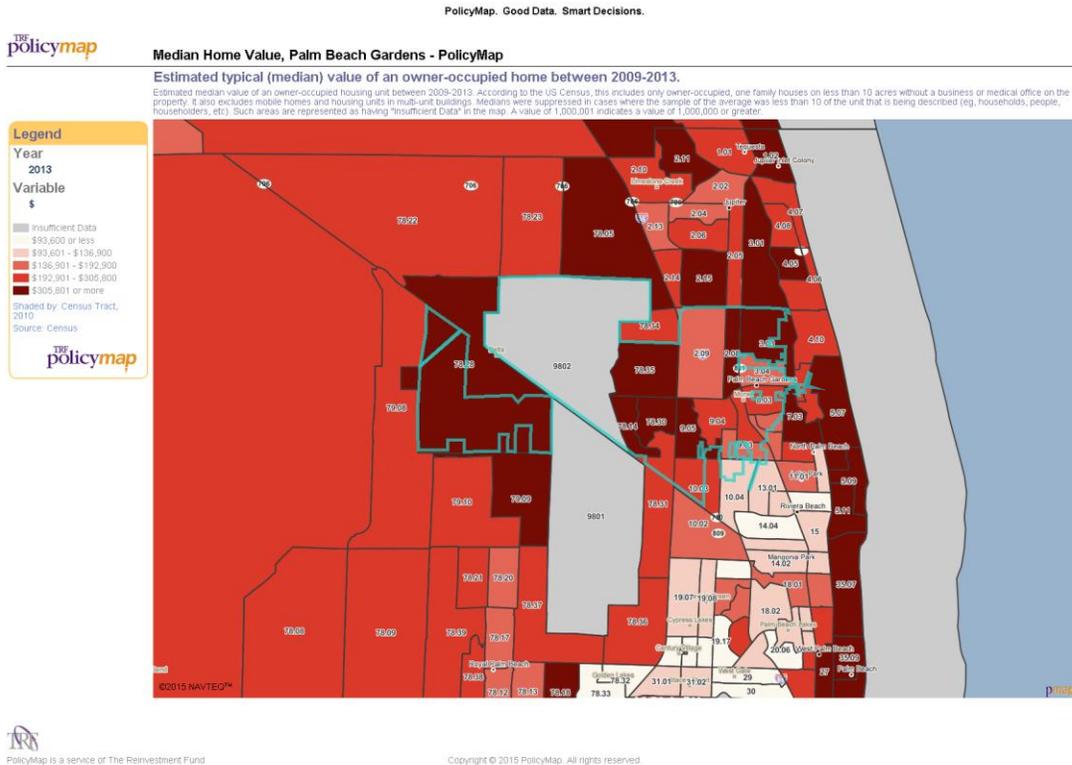


Table: Value of Owner-Occupied Housing, Palm Beach Gardens

Value of Specified Owner-Occupied Units	Number of Units	% Of Total
Less than \$50,000	429	2.7%
\$50,000 to \$99,999	726	4.5%
\$100,000 to \$149,999	1,938	12.0%
\$150,000 to \$199,999	1,974	12.3%
\$200,000 to \$299,999	3,295	20.5%
\$300,000 to \$499,999	3,983	24.7%
\$500,000 to \$999,999	2,711	16.8%
\$1,000,000 or more	1,037	6.4%
Total	16,093	100%
Median Value	\$290,800	-

Source: U.S. Census Bureau, 2009-2013 5-Year American Community Survey

The latest five-year ACS survey estimates that the median value of owner-occupied units in the City is \$290,800, which was higher than Florida’s median value (\$160,200) and higher than the rest of the County (\$199,700).



The map above shows the estimated median value of an owner-occupied home in the City between 2009 and 2013.

H. Housing Supply: Affordable Housing Needs

The Shimberg Center’s Florida Housing Data Clearinghouse provides a summary indicator of projected affordable housing needs. Their analysis projects the growth of severely cost-burdened low-income (80% AMI or less) households over multi-year periods by municipality. According to their data, the number of severely cost-burdened owner households in the City with incomes at 30% AMI or less is expected to grow by 441 households between 2015 and 2040. That is the largest projected increase in the City among lower income owners, followed by 294 severely cost-burdened households earning 30-50% AMI and 356 severely cost-burdened owner households earning 50-80% AMI.

Table: Affordable Housing need 2015-2040, Number of Severely Cost-Burdened Owner Households with Income Less than 80% AMI

Tenure: Owner						
Household Income as % of AMI	2015	2020	2025	2030	2035	2040
30% AMI or less	1,010	1,121	1,227	1,339	1,409	1,475
30.1-50% AMI	674	750	820	894	939	984
50.1-80% AMI	879	966	1,047	1,127	1,188	1,250
Total	2,563	2,837	3,094	3,360	3,536	3,709

Source: Florida Housing Data Clearinghouse, 2015

Table: Affordable Housing need 2015-2040, Number of Severely Cost-Burdened Renter Households with Income Less than 80% AMI

Tenure: Renter						
Household Income as % of AMI	2015	2020	2025	2030	2035	2040
30% AMI or less	794	883	958	1,022	1,080	1,135
30.1-50% AMI	513	574	624	671	708	741
50.1-80% AMI	196	220	239	257	270	284
Total	1,503	1,677	1,821	1,950	2,058	2,160

Source: Florida Housing Data Clearinghouse, 2015

The Shimberg Center anticipates that the largest increase among severely cost-burdened low-income renters between 2015 and 2040 will be among households earning less than

30% AMI, approximately a 327 household increase. The second largest increase is among households earning 30-50% AMI (219 households) followed by an 84 household increase in severely cost-burdened households earning 50-80% AMI.

I. Disparities in Access to Community Asset Indicators

HUD is in the process of developing measurements of access to community assets by jurisdiction and has selected five opportunity indicators upon which to focus: poverty, education, employment, transportation, and health. At this time, HUD's Affirmatively Furthering Fair Housing Data Tool does not include Palm Beach Gardens, so below is a breakdown of disparities in access to community asset indicators for Palm Beach County and the region.

1. Poverty Index – a review of households in poverty and percentage that are receiving public assistance. The low poverty index captures the intensity of poverty in a given neighborhood. The index uses both family poverty rates and public assistance receipt, in the form of cash-welfare, such as Temporary Assistance for Needy Families (TANF).

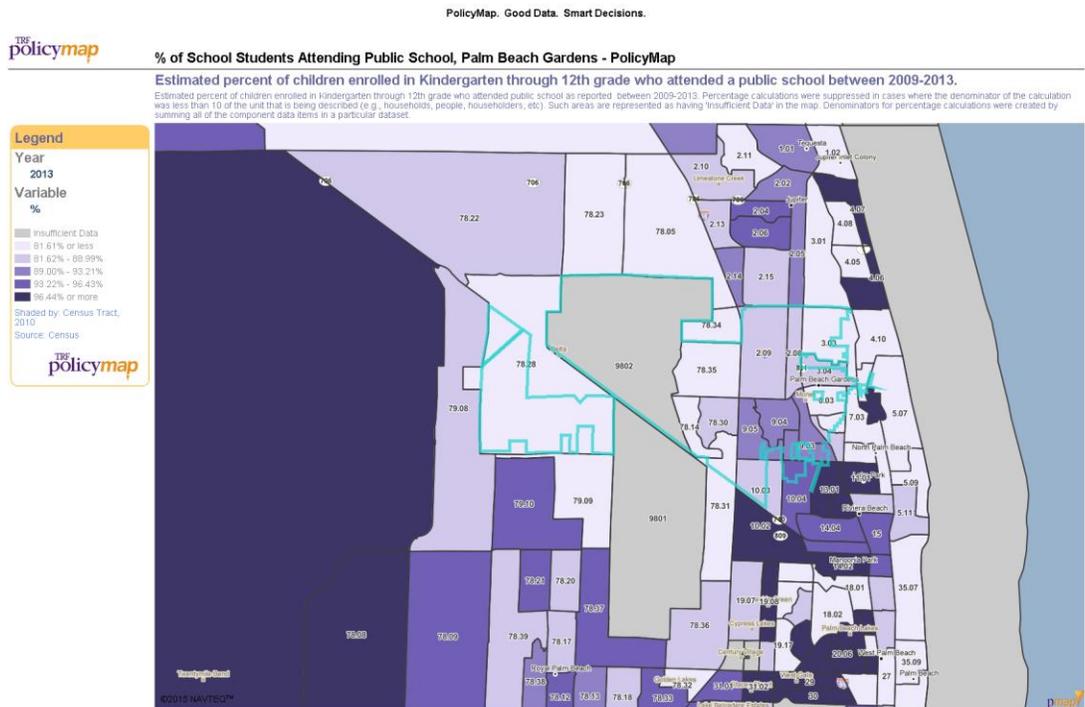
The poverty rate and public assistance are determined at the census tract level. The higher the score means this racial or ethnic group has had less exposure to poverty in a given neighborhood. The index for Palm Beach County's total population is as follows: non-Hispanic Whites scored an index of 50 and non-Hispanic Blacks/African Americans, 37 and Hispanics, 39. These scores are mostly similar to the Region's scores of 65 for non-Hispanic Whites, 39 for Blacks/African Americans, and 49 for Hispanics.

According to PolicyMap, tracts 8.02 (18%) and 3.02 (12%) show the highest percentage of families that live in poverty in Palm Beach Gardens.

2. School Proficiency Index – a review of performance on State level exams to describe which neighborhoods have high- and/or low-performing elementary schools. The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.

Values are percentile ranked and range from 0 to 100—the higher the score, the higher the quality of the school system in a neighborhood. The School Proficiency Index for Palm Beach County’s total population is approximately 49 for non-Hispanic Whites and 42 for Hispanics. The Index for Blacks/African American in the County is far lower at 27.

Below is a map from PolicyMap of the estimated percent of children in the City enrolled in Kindergarten through 12th grade who attended public school between 2009 and 2013.



3. Labor Market Engagement/Human Capital Index – a review of level of employment, labor force participation, and educational attainment. The labor market index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract.

Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood. The Labor Market Index for non-Hispanic Whites in Palm Beach County is 58 and 51 for Hispanics. The Labor Market Index for non-Hispanic Blacks is far lower at 37.

4. Job Access Index – a review of distance to employment centers. The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area, with distance to larger employment centers weighted more heavily.

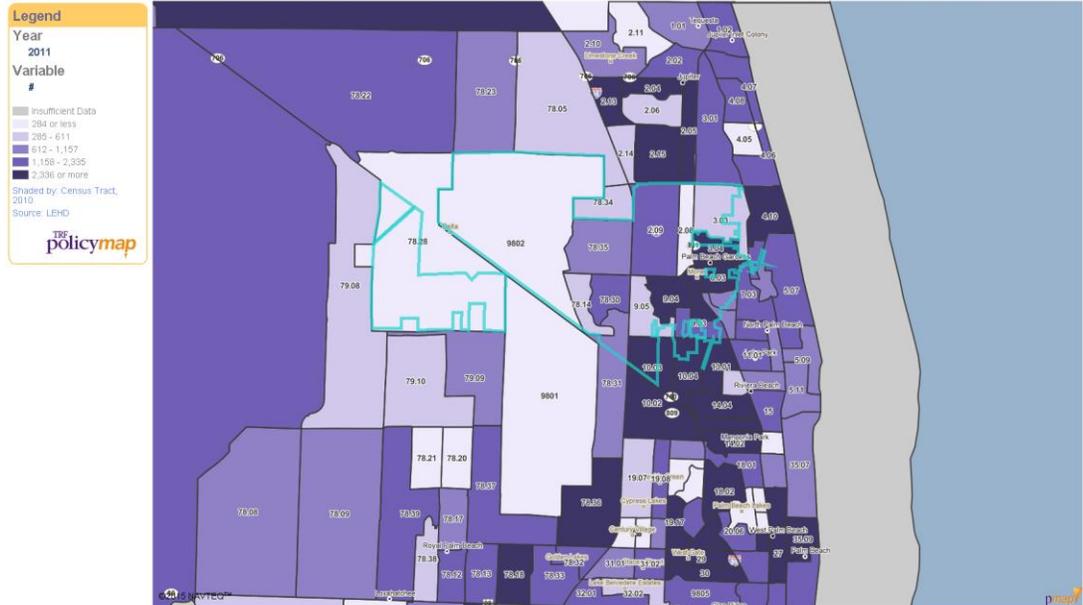
Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. *The Jobs Proximity Index for non-Hispanic Whites in Palm Beach County is 61, for non-Hispanic Whites, 62, for Hispanics, and 57 for non-Hispanic Blacks.*



Count of All Jobs, Palm Beach Gardens - PolicyMap

Total number of jobs located in this area in 2011.

Total count of jobs located in this area in 2011. This is the total number of jobs (primary and non-primary employment). Any location for which the number of jobs is not available is displayed on the map as having insufficient data.



PolicyMap is a service of The Reinvestment Fund

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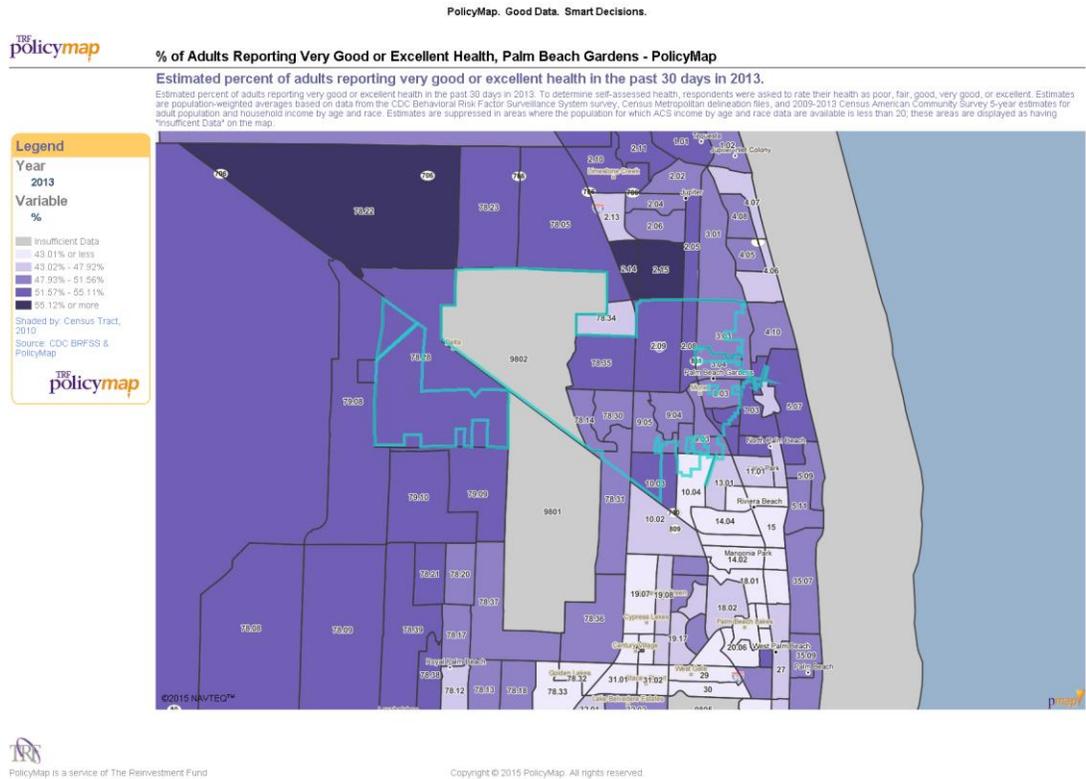
The map above outlines the total number of jobs located in Palm Beach Gardens in 2011. Tracts 3.04, 8.03, 9.04, 10.3, and 10.4 show a higher count of jobs (<2,336 jobs) in the City.

5. Health Hazards Exposure Index – a review of exposure to harmful toxins. The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized Environmental Protection Agency estimates of air quality, carcinogenic, respiratory, and neurological hazards with indexing census tracts.

Values are inverted and then percentile ranked nationally. Values range from 0 to 100—the higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group. *The Environmental Health Index for non-Hispanic Whites in Palm Beach County is 34, non-Hispanic Blacks, 36, and Hispanics, 33.*

Below is a map of the estimated percentage of adults in Palm Beach Gardens reporting very good or excellent health in past 30 days in 2013. This data is based

on the CDC Behavioral Risk Factor Surveillance System Survey, Census Metropolitan delineation files, and 2009-2013 ACS data.



6. Transit Access – a review of accessibility to transit within neighborhoods. This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.

Values are inverted and percentile ranked nationally, with values ranging from 0 to 100—the higher the score, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

The Transportation Cost Index for non-Hispanic Whites in Palm Beach County is 62, non-Hispanic Blacks, 65, and Hispanics, 63.

Table: Community Assets by Race/Ethnicity, West Palm Beach County

West Palm Beach County	Low Poverty Index	School Proficiency Index	Labor Market Index	Jobs Proximity Index	Environmental Health Index	Transportation Cost Index
Total Population						
White, Non-Hispanic	50.39	49.05	58.33	61.45	34.42	62.86
Black, Non-Hispanic	37.19	27.08	37.77	57.64	36.08	65.22
Hispanic	39.23	42.40	51.19	62.55	33.16	63.22
Asian or Pacific Islander, Non-Hispanic	57.15	36.52	61.75	57.13	37.74	62.65
Native American, Non-Hispanic	41.91	39.00	50.12	65.40	34.26	66.39
Poor Population						
White, Non-Hispanic	43.50	52.68	53.13	60.80	34.31	63.87
Black, Non-Hispanic	23.02	31.61	29.76	46.47	35.35	67.40
Hispanic	30.84	46.80	48.24	58.29	32.06	64.19
Asian or Pacific Islander, Non-Hispanic	56.20	42.95	52.87	67.70	35.77	66.42
Native American, Non-Hispanic	23.49	54.30	52.66	38.85	33.01	63.72

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

J. Disproportionate Housing Needs

HUD defines disproportionate need as the situation when the percentage of households in a specific category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of households in that same income category as a whole.

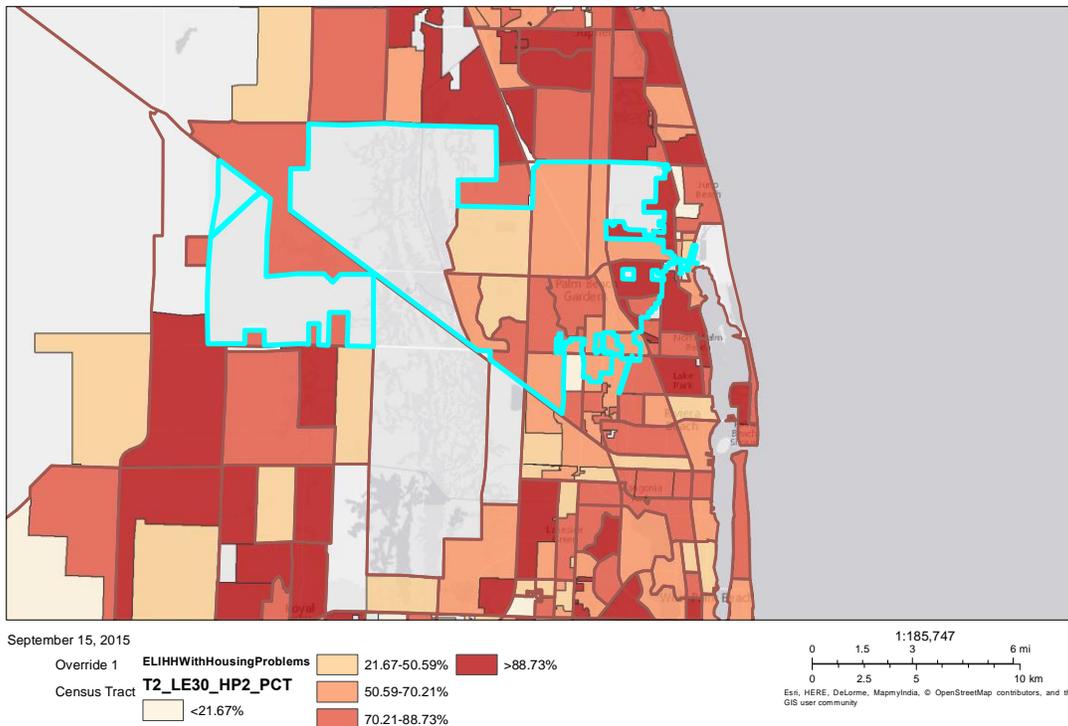
Specific racial or ethnic groups may experience severe housing problems more often than the jurisdiction as a whole. Severe housing problems include the lack of complete kitchen facilities, lack of complete plumbing facilities, severe overcrowding (more than 1.5 person per room), and severe cost-burden (over 50%). According to HUD guidelines, a disproportionately greater need exists when the rate of severe housing problems experienced by a specific racial or ethnic group is at least 10% greater than the rate experienced by that category of the population as a whole.

Using 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) data, the percentages necessary to qualify as disproportionate, per the definition above) were calculated. Then, the qualifying percentages were compared to the existing percentages in various income/need categories for the various races and ethnicities, as provided by the CHAS. Below is a breakdown of the disproportionately greater need in the City with

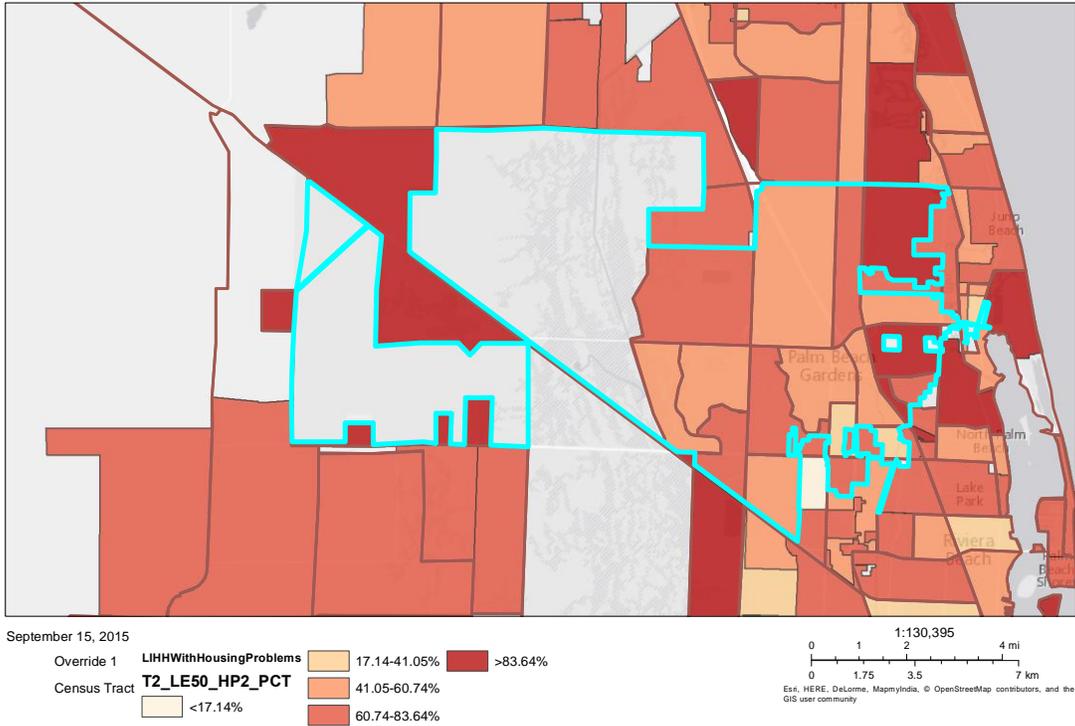
housing problems. By HUD’s definition of a disparity of 10% or higher, a few different racial and ethnic groups experience a disproportionately greater need when it comes to severe housing problems.

Among the 1,875 households with incomes 0% – 30% of AMI, 1,335 or 71% experience one or more severe housing problems. Disproportionately greater needs exist for Black / African American households (82%), Asian households (83%), and American Indian / Alaska Native households (100%). Among the 1,965 households with incomes 30% – 50% of AMI, 1,115 or 57% experience one or more severe housing problems. Disproportionately greater needs exist for Black / African American households (100%), and Asian households (100%). Among the 3,580 households with incomes 50% – 80% of AMI, 1,020 or 28% experience one or more severe housing problems. Disproportionately greater needs exist for Asian households (100%). Among the 1,970 households with incomes 80% – 100% of AMI, 265 or 13% experience one or more severe housing problems. Disproportionately greater needs exist for Hispanic households (29%). There are 9,390 households in Palm Beach Gardens among the income groups within the 0% – 100% AMI range. 434 constitutes the greatest number of households experiencing severe housing problems at disproportionate levels.

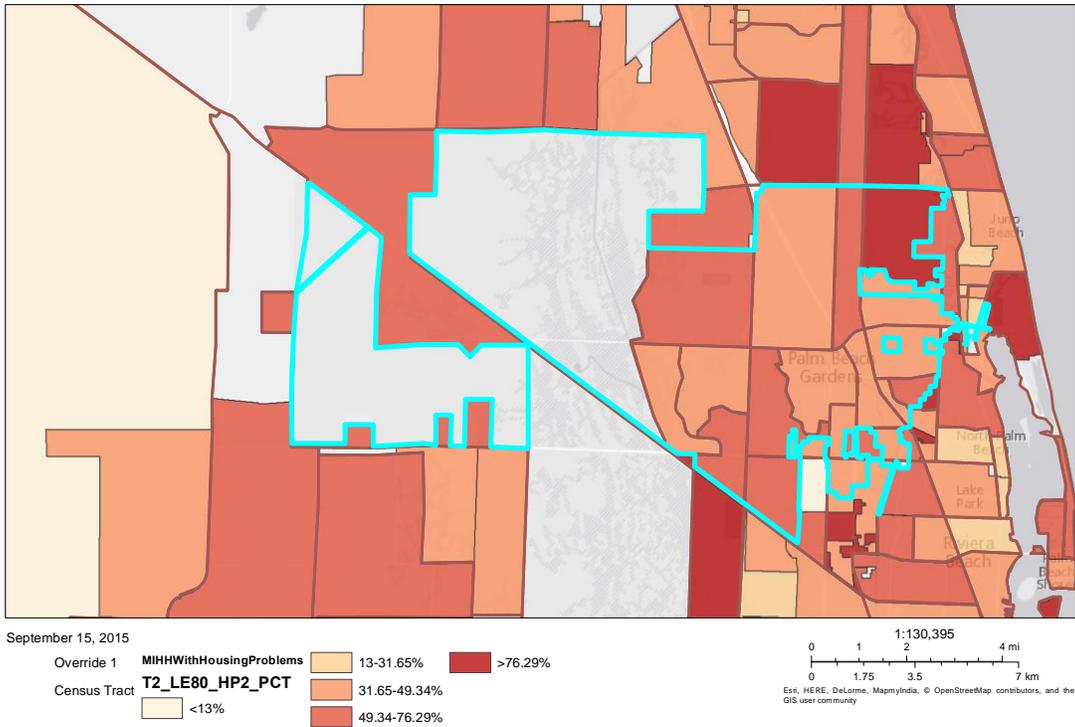
% of ELI Households w/ Any of 4 Severe Housing Problems, Palm Beach Gardens - CPD Maps



% of LI Households w/ Any of 4 Severe Housing Problems, Palm Beach Gardens - CPD Maps



% of MI Households w/ Any of 4 Severe Housing Problems, Palm Beach Gardens - CPD Maps

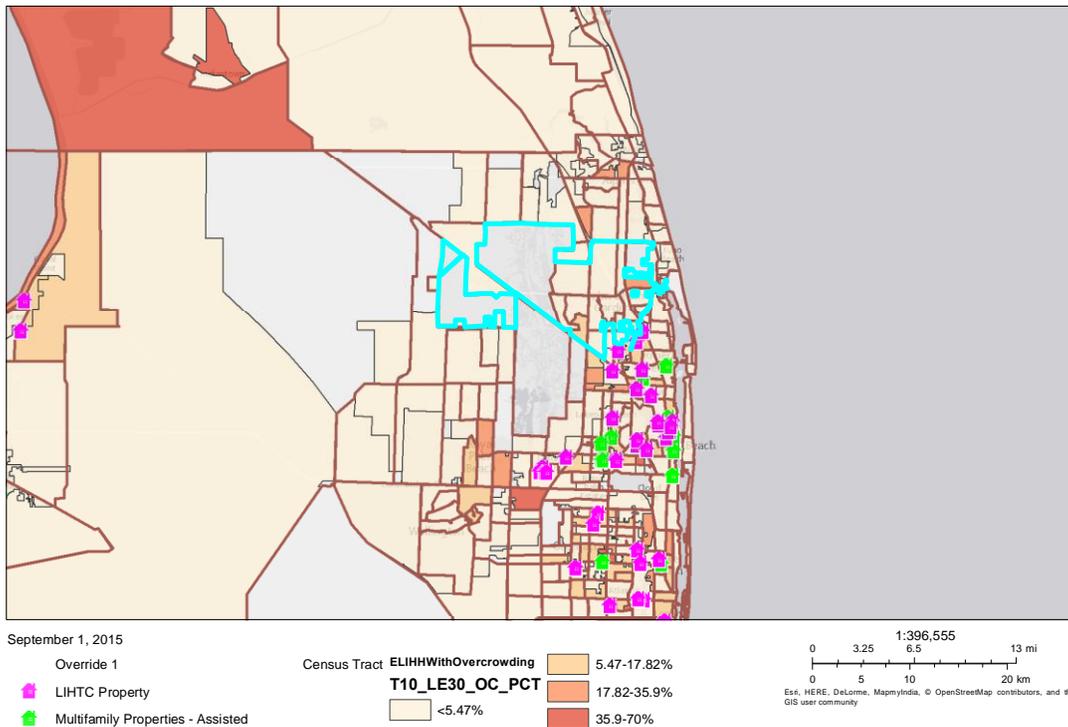


Above is a geographic breakdown of households in the City with any of the four severe housing problems by income group. The data in these maps are based on 2005-2009 CHAS data and show Extremely Low Income or ELI (30% of AMI), Low Income or LI (80% AMI), and Moderate Income or MI households (120% of AMI) with severe housing problems within the jurisdiction by census tract.

K. Homelessness

The City of Palm Beach Gardens participates in the West Palm/Palm Beach County Continuum of Care. According to West Palm/Palm Beach County’s 2015 Homeless Point-in-Time (PIT), there are 1,421 homeless throughout the County, of which approximately 825 are unsheltered and 596 sheltered.

Risk of Homelessness from Housing Instability, Palm Beach Gardens - CPD Maps



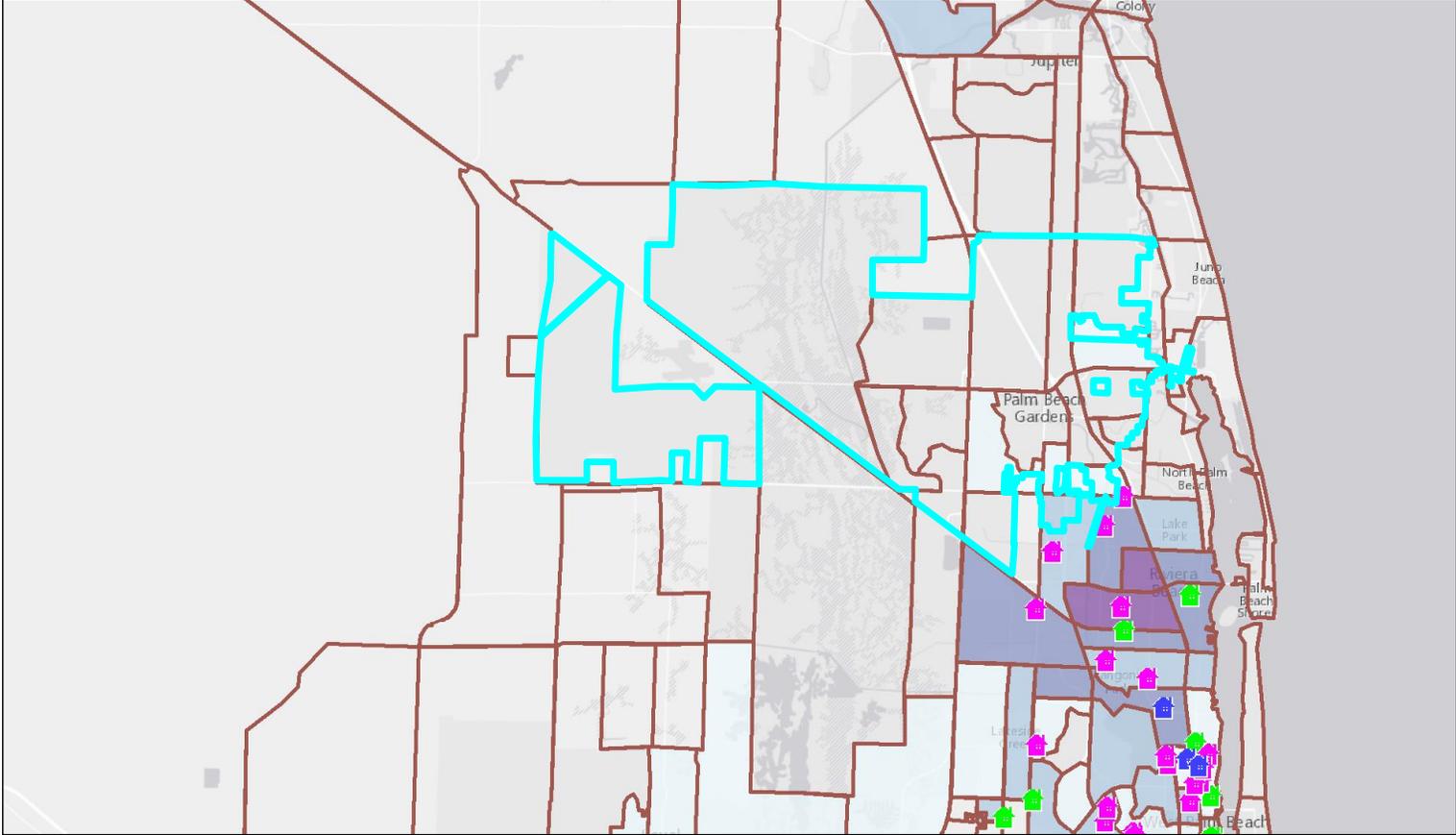
The map above shows the risk of homelessness due to housing instability by census tract in Palm Beach Gardens. Tract 3.04 has the highest percentage of extremely low-income households living doubled-up in the City.

L. Public and Assisted Housing

There are no public or assisted housing developments located in Palm Beach Gardens. The Palm Beach County Housing Authority owns and operates 961 public housing units

and administers 4,480 Section 8 vouchers. Below are maps outlining the distribution of public and assisted housing developments in Palm Beach Gardens and Palm Beach County.

Public and Assisted Housing, Palm Beach Gardens - CPD Maps



August 31, 2015

Override 1	Census Tract	5.91-11.58%
Public Housing Development	VoucherConcentration	11.58-20.44%
LIHTC Property	HCV_PCT_RENTER_OCC_UNITS	20.44-39.25%
Multifamily Properties - Assisted		<5.91%

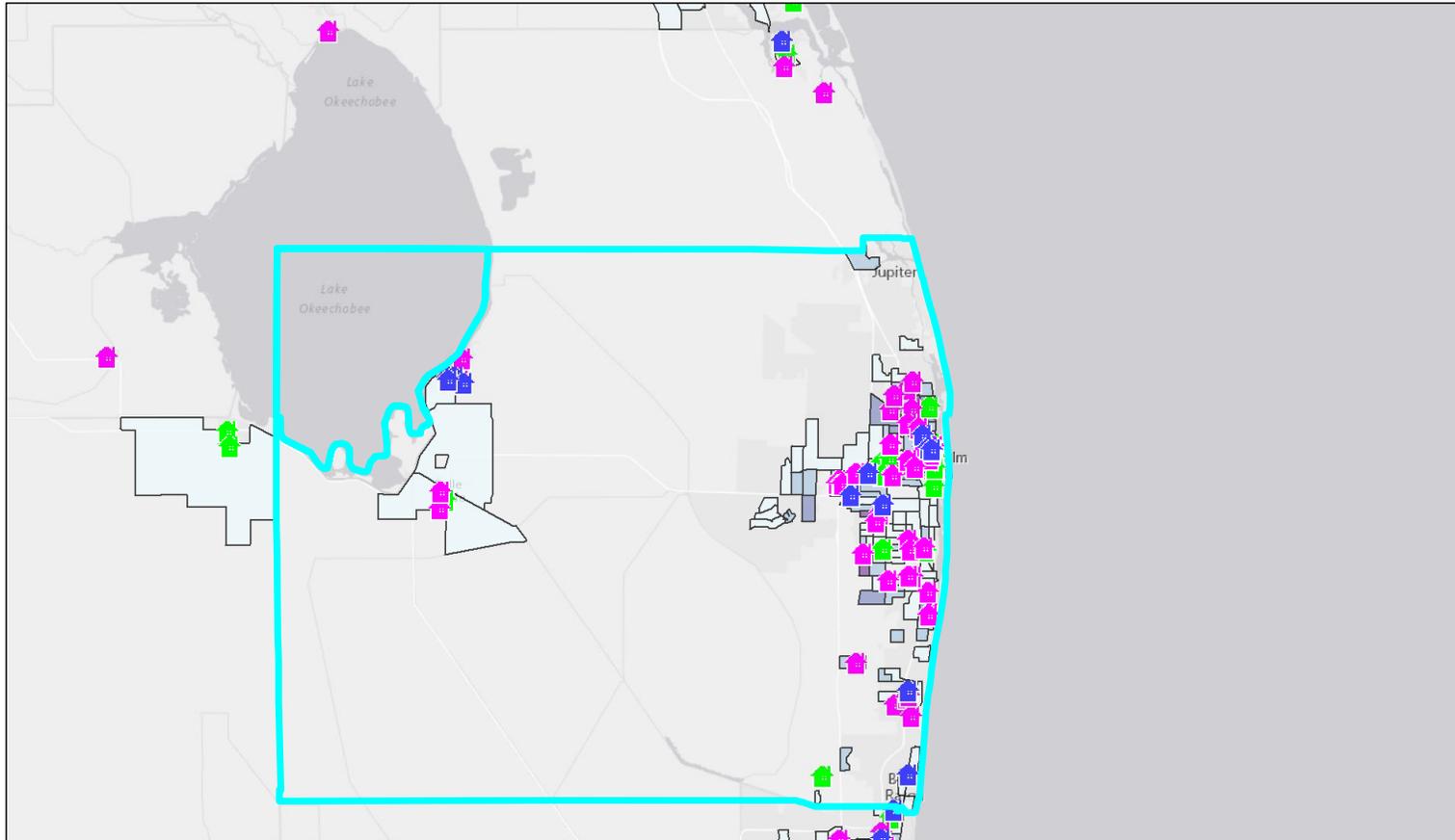
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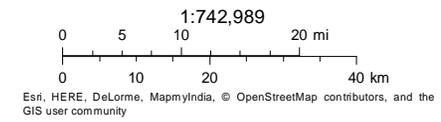
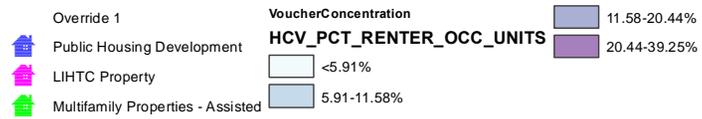
0 2.5 5 10 km

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Public and Assisted Housing, Palm Beach County - CPD Maps



August 31, 2015



M. Housing Needs of Disabled Persons

A person with a disability is someone who is determined to:

- Have a physical, mental or emotional impairment that:
 - Is expected to be of long-continued and indefinite duration;
 - Substantially impedes his or her ability to live independently; and
 - Is of such a nature that the ability could be improved by more suitable conditions; or
- Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C 6001-6007); or
- Be the surviving member or members of any family that had been living in an assisted housing unit with the deceased member of the family who had a disability at the time of his or her death.

According to the latest five-year ACS data there are 5,374 persons with a disability in the City between 2009 and 2013. 26% or 3,461 of the residents with a disability in the City are 65 years old and over.

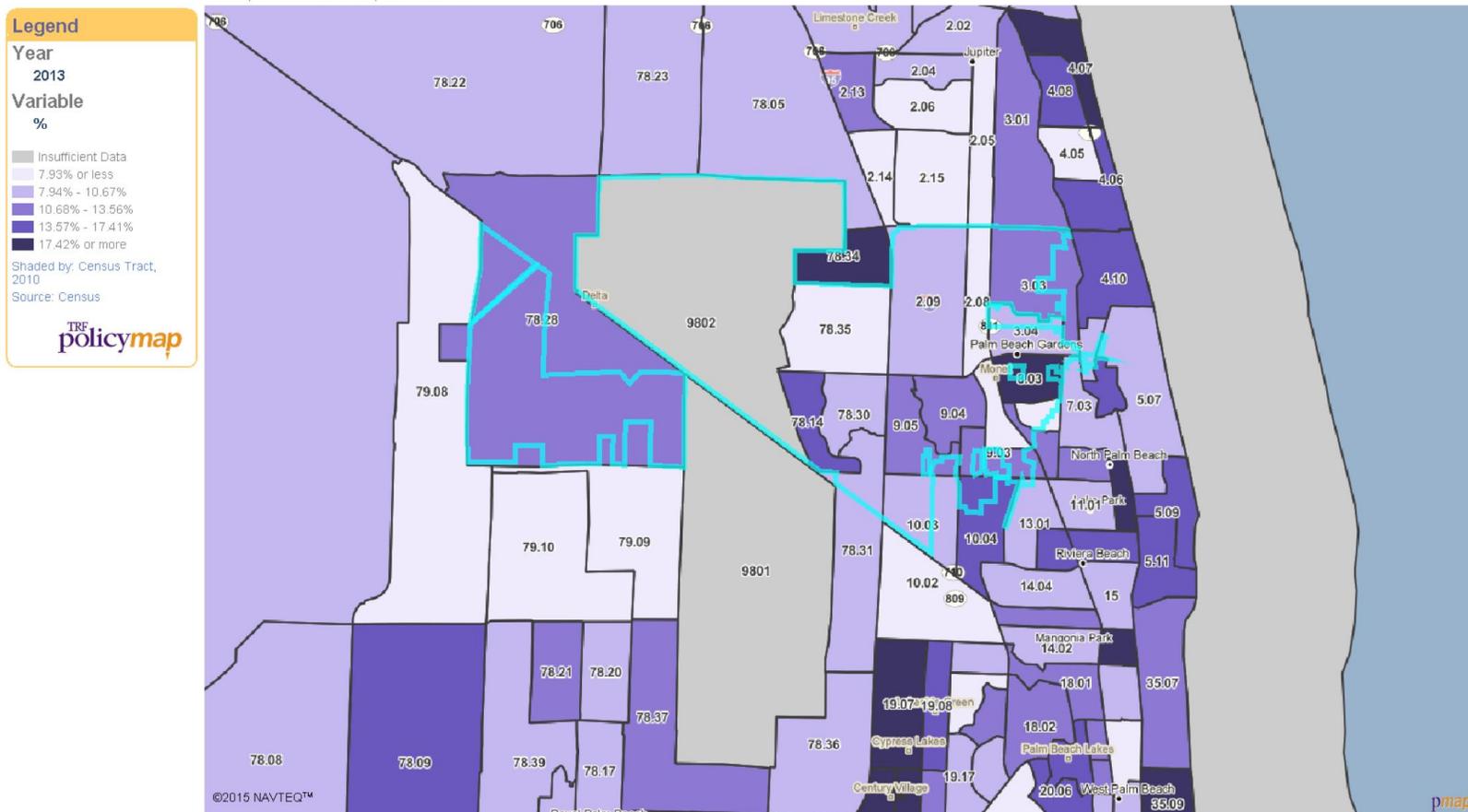
Below is a map that shows the estimated percentage of the City's civilian noninstitutionalized population with one or more types of disabilities between 2008 and 2012. The map shows a concentration of people with a disability in tract in 8.03 (17%).



Percent of People with a Disability, Palm Beach Gardens - Policymap

Estimated percent of people with one or more disabilities between 2009-2013.

Estimated percent of the civilian noninstitutionalized population with one or more types of disabilities between 2009-2013. Percentage calculations were suppressed in cases where the denominator of the calculation was less than 10 of the unit that is being described (e.g., households, people, householders, etc.). Such areas are represented as having "Insufficient Data" in the map. Denominators for percentage calculations were created by summing all of the component data items in a particular dataset.



III. Fair Housing Profile

A. Home Lending Analysis for Palm Beach Gardens

Home Mortgage Disclosure Act (HMDA) lending data indicates there were 1,199 home purchase loans originated in Palm Beach Gardens in 2013. White applicants comprised nearly 86% of the City's total loans originated that year while Asian applicants made up about 4% and Black or African Americans, 2%. 2% of applicants did not provide any racially identifying information.

Of the 244 denied home purchase loan applications in 2013, 211 or 87% were White. Asian applicants comprised 2% of denied home loan applications in the City and Black or African Americans, 1%.

Table: Home Purchase Loan Approval/Denial by Race, 2013

Applicant Race	Loans Originated	Application Denied	Other
Asian	51	6	14
Black or African American	22	3	5
White	1,031	211	289
Information not provided by applicant	77	24	30
Not applicable	18	-	2
Total	1,199	244	340

Source: Florida Housing Data Clearinghouse, 2015

Table: Home Purchase Loan Approval/Denial by Hispanic/Latino Ethnicity, 2013

Applicant Race	Loans Originated	Application Denied	Other
Hispanic or Latino	96	25	28
Not Hispanic or Latino	1,006	189	282
Information not provided by applicant	79	30	28
Not applicable	18	-	2
Total	1,199	244	340

Source: Florida Housing Data Clearinghouse, 2015

According to the HMDA data, Hispanics or Latinos of any race made up 8% of the total home purchase loans originated in the City in 2013 and consisted of 10% of the total

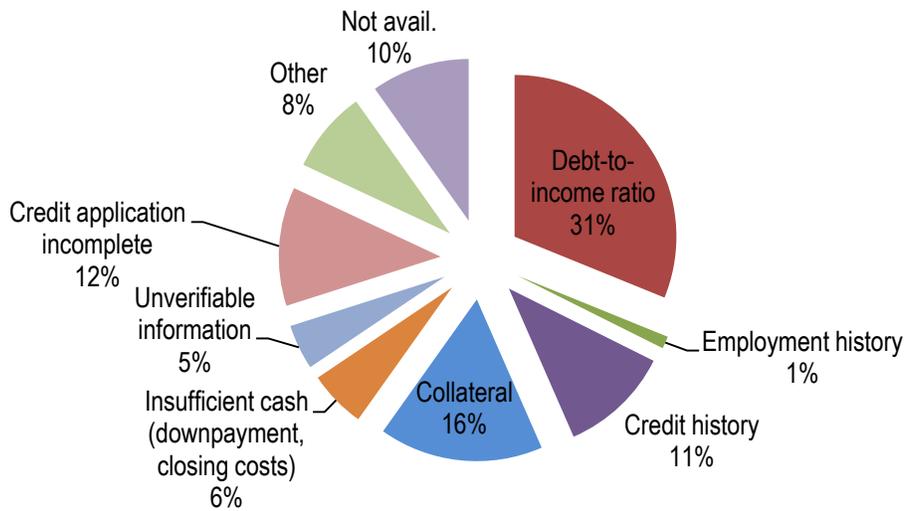
denied applicants. Non-Hispanic or Latino applicants made up 1,006 or 84% of the loans originated in the City for that year and 189 or 77% of the denied applications.

The most prevalent reason for loan application denials in Palm Beach Gardens in 2013 was due to the applicant’s debt-to-income ratio (31%) followed by issues with collateral (16%). Approximately 12% of applications were unsuccessful because the applicant failed to complete the application and 11% were denied due to credit history.

Table: Home Purchase Loan Denial Reasons, 2013

Denial Reason	Applications Count
Debt-to-income ratio	76
Employment history	3
Credit history	27
Collateral	40
Insufficient cash	14
Unverifiable information	11
Credit application incomplete	29
Other	20
Not available	24
Total	244

Source: Florida Housing Data Clearinghouse, 2015





% Change in Loans, Palm Beach Gardens - PolicyMap

Percent change in the number of all home loans that were made between 2011 and 2013.

Percent change in the number of all home loans originated between 2011 and 2013. These loans were originated for the purchase or refinancing of an owner-occupied, one-to-four family dwelling, as reported by HMDA. Medians were not calculated and percents were not computed where the count of loan events of that type or the denominator of the calculation was less than five. These data are mapped to the 2010 Census boundaries. For percent changes, TRF created a bridge table between 2000 and 2010 geographies in order to calculate previous years of data at 2010 Census boundaries. These previous years of data calculations are used for comparison to the current year of data.

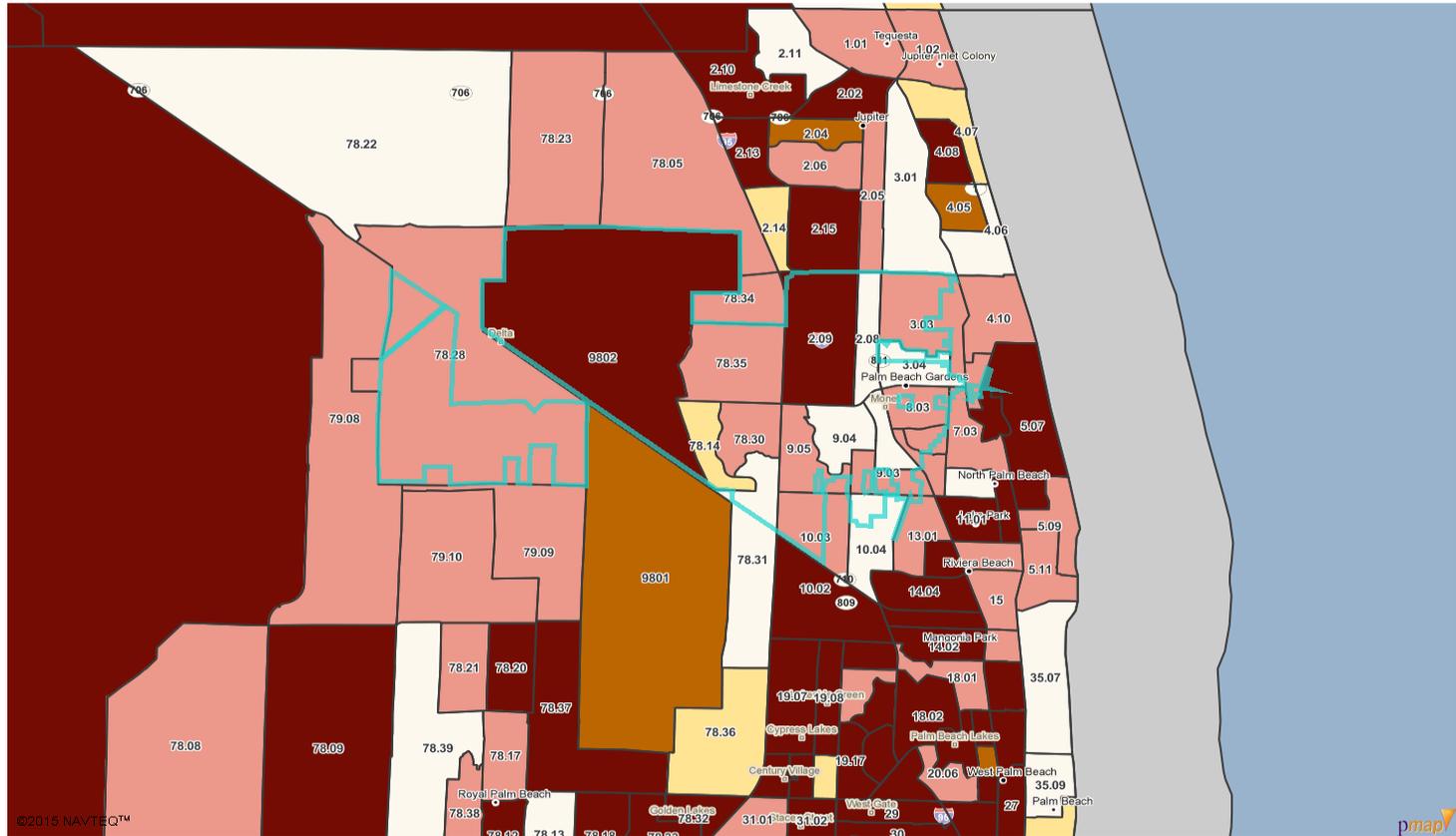
Legend

Year
2013

Variable
%Ch

- Insufficient Data
- 4.48% or less
- 4.47% - 11.83%
- 11.84% - 29.27%
- 29.28% - 57.14%
- 57.15% or more

Shaded by: Census Tract, 2010
Source: HMDA





% of Loans Made to Asians, Palm Beach Gardens - PolicyMap

Percent of all home loans that were made to Asians in 2013.

Percent of all loans in 2013 that were originated to Asian applicants. Medians were not calculated and percents were not computed where the count of loan events of that type or the denominator of the calculation was less than five. These data are mapped to the 2010 Census boundaries.

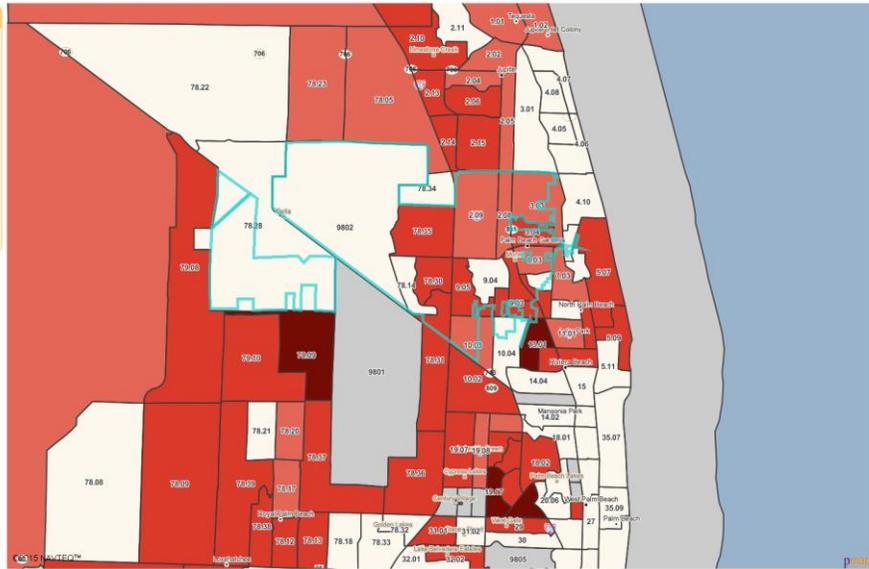
Legend

Year
2013

Variable
%

- Insufficient Data
- 0.17% or less
- 0.18%
- 0.19% - 2.17%
- 2.18% - 5.94%
- 5.95% or more

Shaded by Census Tract, 2010
Source: HMDA
THE policymap



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% of Loans Made to African Americans/Blacks, Palm Beach Gardens - PolicyMap

Percent of all home loans that were made to African Americans in 2013.

Percent of all loans in 2013 that were originated to Black or African American applicants. Medians were not calculated and percents were not computed where the count of loan events of that type or the denominator of the calculation was less than five. These data are mapped to the 2010 Census boundaries.

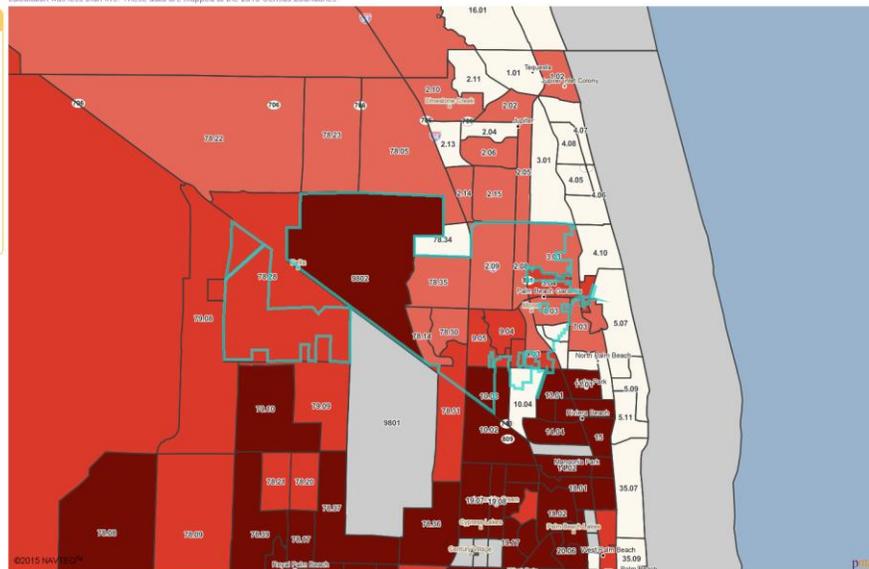
Legend

Year
2013

Variable
%

- Insufficient Data
- 0.13% or less
- 0.14%
- 0.15% - 2.17%
- 2.18% - 7.14%
- 7.15% or more

Shaded by Census Tract, 2010
Source: HMDA
THE policymap



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B. Foreclosure Data

According to RealtyTrac, the City of Palm Beach Gardens had 608 properties in some stage of foreclosure (default, auction or bank owned) as of September 2015. In August 2015, the number of properties that received a foreclosure filing in Palm Beach Gardens was 51% lower than the previous month and 64% lower than the same time last year.

C. Fair Housing Complaints

Between 2008 and 2014, there were nearly 282 fair housing complaints in Palm Beach County of which 2 were in the City of Palm Beach Gardens. In one case there was a no cause determination and in the other the complainant withdrew the complaint after resolution. Both complaints in the City were closed in 2013.

Approximately 115 (41%) of the 282 complaints in Palm Beach County between 2008 and 2014 resulted in a no cause determination. 64 (23%) complaints were withdrawn by the complainant after resolution, while 49 (17%) complaints reached conciliation or settlement successfully. Approximately 7% (21) of the cases were closed after the complainant withdrew the complaint without resolution.

IV. Impediments and Recommendations

Upon completion of examination of all available data and public comments and input, the following are the key impediments to fair housing choice in Palm Beach Gardens. Each impediment is followed by a specific recommendation to address it.

Impediment #1: Awareness of fair housing laws, issues, potential violations and resources appears to be limited.

Recommendation: The City of Palm Beach Gardens should develop a webpage focused on fair housing and have information posted and available on fair housing laws to the public, staff, realtors, property owners and lenders.

Recommendation: The City of Palm Beach Gardens should promote awareness regarding local, state and federal fair housing laws and assist in reporting violations and allegations of violations brought to the City's attention to the appropriate County (Palm Beach County Office of Equal Opportunity), State (Florida Commission on Human Relations) or Federal (HUD) agency.

Recommendation: Enhance understanding of real estate transactions, the attributes of predatory-style loans and how to establish and keep good credit, particularly for first-time homebuyers, through information about courses and seminars on the city's fair housing webpage.

Impediment #2: Lack of adequate capital resources to address affordable housing gap.

Recommendation: Continue to participate in the Community Development Block Grant program, and encourage participation from minorities and protected classes.

Recommendation: Continue to work with all development stakeholders in the city and region to promote affordable housing development. The City should explore opportunity to participate in the Community Reinvestment Act, SHIP and other resources to address gaps in affordable housing development projects.

Appendix A: Palm Beach Gardens Analysis of Impediments to Fair Housing Citizen Participation

The City of Palm Beach Gardens conducted a three-part process to gain citizen input on community development, affordable housing and fair housing issues and strategies including a public workshop, a thirty-day review of the draft Analysis of Impediments to Fair Housing report and a public hearing.

The City of Palm Beach Gardens conducted a Community Development Block Grant (CDBG) public workshop on Thursday, June 25, 2015. An advertisement was published on Wednesday, June 10, 2015 in the local newspaper, The Palm Beach Post. Information regarding the workshop was also posted on the City's website and at City Hall. One resident attended the workshop in addition to six City staff members. During the meeting, the staff that managed the Consolidated Plan process gave an overview of the CDBG Program and its requirements. In addition, strategies including single-family rehabilitation were discussed. A public discussion period was opened but the resident who attended the meeting did not have any questions or comments. City staff members who attended the meeting and not part of the Consolidated Plan process asked questions relative to the intent and operation of the (new) CDBG program.

The Analysis of Impediments to Fair Housing draft report was posted on the City website on November 23, 2015 for public review and comment. The closing date for public comments was on December 23, 2015. The City did not receive any comments on the draft report.

A Public Hearing was held on the evening of December 3, 2015 as part of the regular City Council meeting. A resolution was presented to the City Council to adopt the Analysis of Impediments to Fair Housing report and was unanimously approved. There were no public comments during the public hearing.

