



PALM BEACH
Gardens

City of Palm Beach Gardens



Community Development Block Grant
Program Year 2020 – 2024
Consolidated Plan

PREPARED BY: The Florida Housing Coalition, Inc.
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Executive Summary

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

1. Introduction

The City of Palm Beach Gardens participates in the Community Development Block Grant (CDBG) Entitlement Program which is administered by the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City receives an annual allocation of federal funding from HUD based on an allocation formula that considers factors such as population size and the number people living in poverty. The City's CDBG funding can be used for a wide range of housing and community development activities that must primarily benefit low- and moderate-income persons.

In order to receive the funding, the City is required to apply to HUD through a process called Consolidated Planning. The Consolidated Planning process requires that the City develop this Five-Year Consolidated Plan which describes the needs in the City and outlines a plan for how the CDBG funds will be used. The City must also develop an Annual Action Plan which provides more details on the actual activities and projects that the City will fund. The Annual Action Plan is linked to the Strategic Plan, a component of the Consolidated Plan.

This Program Year (PY) 2020-2024 Consolidated Plan is the City's second plan since it became an entitlement community. To develop this Plan, the City consulted with residents and stakeholders to aid in the identification and prioritization of need. The City also analyzed data from various sources to determine the need in the areas of affordable housing, homelessness, non-housing community development, and non-homeless special needs.

During the five years covered by this Consolidated Plan, the City expects to receive \$1,188,230 in CDBG funding. This assumes an annual allocation of \$237,610 – the City's allocation for PY 2020-2021. The CDBG funds will be used to address the priority needs identified in the Strategic Plan.

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

The CDBG program has three objectives: creating suitable living environments, providing decent affordable housing, and creating economic opportunities. Corresponding outcomes are accessibility/availability, affordability, and sustainability.

The key findings of the Needs Assessment are the need for affordable housing and for public infrastructure improvements in the City. Based on these findings the following objectives and outcomes were identified for the City’s CDBG program:

1	Goal: Improve access to public infrastructure
	Objective: Suitable Living Environment
	Outcome: Sustainability - Promoting Livable or Viable Communities
2	Goal: Rehabilitation of existing housing units
	Objective: Decent Housing
	Outcome: Affordability
3	Goal: Improve access to public services
	Objective: Suitable Living Environment
	Outcome: Availability/Accessibility

3. Evaluation of past performance

During the term of the City’s previous Consolidated Plan, the Planning and Zoning Department created and implemented the Owner-Occupied Rehabilitation Assistance Program, a program designed to preserve and extend the life of the existing housing stock by providing financial assistance to income eligible homeowners to make their housing more affordable. The City has successfully completed 18 rehabilitation projects in the past five years and has several construction projects underway. The goal of rehabilitating owner-occupied housing units remains a goal in this Consolidated Plan because City residents continue to demonstrate a need for housing assistance.

4. Summary of citizen participation process and consultation process

The City facilitated a public hearing on August 12, 2020 to encourage citizen participation in the development of the Consolidated Plan and Annual Action Plan. Additionally, the City conducted an online survey to get input for residents and stakeholders on the needs in the community and the prioritization of those needs. The City also made the proposed Consolidated Plan and Annual Action Plan available for review on its website during a 15- day comment period. A public hearing was also held on November 5, 2020 before the City Council for approval of the Consolidated Plan and Annual Action Plan.

5. Summary of public comments

No public comments were received during the August 12, 2020 public hearing, the 15- day comment period, or during the November 5, 2020 public hearing . A summary of the survey results is included as an attachment to this Plan.

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

There were no comments, opinions, or statements rejected during the course of the public comment period, survey collection, or publicly available meetings.

7. Summary

This Consolidated Plan is comprised of several components including: a needs assessment that analyzes the current market conditions, a section on the needs for people who are experiencing homeless, a Strategic Plan section and the Annual Action Plan. The Strategic Plan is a key component of the Consolidated Plan, as this section outlines the City’s objectives and outcomes to meet the needs identified in the assessment section. The Annual Action Plan outlines how federal resources will be allocated. Each subsequent year of the Consolidated Plan, the City will prepare an Annual Action Plan to communicate how the CDBG funds will be allocated to meet the objectives identified in the Consolidated Plan.

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 BEACH GARDENS	
CDBG Administrator	PALM BEACH GARDENS	Planning Department

Table 1 – Responsible Agencies

Narrative

The City of Palm Beach Gardens Planning and Zoning Department is the lead agency responsible for administering federal grant funding received from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) Entitlement 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

In developing this Consolidated Plan and First Year Annual Action Plan, the City consulted with the Housing and Homeless Alliance of Palm Beach County, Palm Beach County Department of Housing and Economic Sustainability, Palm Beach County Housing Authority, and several social service agencies in the City and neighboring communities.

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)).

Generally, the City coordinates with a variety of stakeholders whose objectives align with the City’s Strategic Plan. There is no public housing agency in the City and few assisted housing developments however the City encourages private developers to include workforce housing units in their projects. The City also works closely with Palm Beach County and other entities that operate countywide to address the social services and health needs of its residents.

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 Homeless and Housing Alliance of Palm Beach County (HHA), the lead agency from the Continuum of Care, coordinates the countywide response to homelessness. The City coordinates with the HHA by attending and participating in HHA quarterly meetings, reviewing CoC projects for consistency with the City’s Consolidated Plan, and maintaining regular communication with HHA staff. The Philip D. Lewis Homeless Resource Center is the central point of access for all persons experiencing homelessness and, in the past, the City has aided in fundraising efforts for the operation of the facility.

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 Beach Gardens is not a recipient of Emergency Solutions Grant (ESG) funding.

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

1	Agency/Group/Organization	Palm Beach Gardens
	Agency/Group/Organization Type	Grantee Department
	What section of the Plan was addressed by Consultation?	Other: Non-Housing Community Development Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Staff of the Palm Beach Gardens Engineering Department were contacted directly to provide supporting documents and develop a proposed budget for a Public Infrastructure project to be carried out during PY 2020-2021.
2	Agency/Group/Organization	Palm Beach County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	A review of the PHAs Annual Plan was conducted and data related to the needs of public housing residents was secured from the Palm Beach County Department of Housing and Economic Sustainability who consulted directly with the PHA for preparation of the County’s Consolidated Plan. The City will support the initiatives of the Housing Authority.
3	Agency/Group/Organization	Homeless and Housing Alliance
	Agency/Group/Organization Type	Services- homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs – Chronically homeless Homeless Needs – Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied Youth Homelessness Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was contacted to provide data on homeless needs for the jurisdiction. The City will continue to coordinate with the HHA.

Table 2 – Agencies, groups, organizations who participated

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

The City endeavored to consult with all agency types. No agencies were intentionally excluded from 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	Homeless and Housing Alliance of Palm Beach County	As the lead agency for the CoC, this plan guides the County’s strategy for ending homelessness including those identified in this Plan.
Palm Beach County FY 2020-2024 Consolidated Plan	Palm Beach County Department of Housing and Economic Sustainability	Both the City of Palm Beach Gardens and Palm Beach County have identified the need to increase the supply of affordable housing as an objective in the respective Consolidated Plans.
FY 2020-2021 Annual PHA Plan	Palm Beach County Housing Authority	The mission of the Palm Beach County Housing Authority is to provide affordable housing for low-income persons including elderly persons and persons with disabilities. This goal is also part of the City’s Strategic Plan.
Comprehensive Land Use Plan	Palm Beach Gardens	The goal of rehabilitating existing housing units addresses the affordable housing need and aligns with the Housing Element of the City’s Comprehensive Plan.
Standards for Onsite Sewage Treatment and Disposal Systems	State of Florida Department of Health	Currently some areas of the City are not in compliance with health department codes and the goal of improving access to public infrastructure directly relates to addressing this code requirement.
PY 2020-2024 Analysis of Impediments to Fair Housing Choice (AI)	Palm Beach Gardens	The goals and strategies included in the AI are incorporated into the City’s Strategic Plan.

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 will continue to engage with adjacent units of local government and other governmental agencies in the implementation of the Consolidated Plan. The City coordinates with Palm Beach County as well as neighboring entitlement communities such as the Town of Jupiter and the City of Boca Raton throughout the program year and has a collaborative approach toward the proper and efficient administration of the federal funds.

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.

The City engaged in several outreach efforts to encourage citizen participation in the development of the Consolidated Plan. Due to public health and safety concerns associated with the COVID-19 pandemic, the City hosted a virtual public hearing, as permitted by HUD waivers, on August 12, 2020 for the purpose of getting input from residents and stakeholders on the top housing and community development needs. During the meeting, information was shared on the goals and objectives of the CDBG program, the amount of CDBG funds anticipated, and a summary of the data from the Needs Assessment and the Market Analysis was also presented to give participants a view of information that the City would consider when making funding decisions. Participants were given an opportunity to ask questions of City staff and to participate openly in the meeting.

In addition to the meeting, the City also conducted an online survey, referred to throughout this Plan as the 2020 Consolidated Plan survey. Survey responses were used to guide prioritization of needs and where relevant, results are cited in the Plan. The survey results are also included as an attachment to the Plan. The City received a total of 58 responses to the survey, mostly from residents, but two respondents identified as a provider of social services.

To broaden public participation in the Plan, including participation from minorities, non-English speaking persons, and persons with disabilities, the City used traditional and non-traditional outreach efforts. Notice of the public hearing was advertised in the Palm Beach Post and information about the meeting and the survey was shared using several methods: direct email to agencies and organizations that serve low-and moderate-income residents, posting to the City’s social media pages (Facebook, Twitter, Instagram), posting on the City’s website home page, as well as posting to NewsFlash, an email notification tool, that delivers information directly to subscribers.

A summary of the proposed Consolidated Plan and Annual Action Plan was published in the Palm Beach Post and on the Internet to give residents and interested persons an opportunity to comment on the activities that will be undertaken. The notice for public comment was published on October 21, 2020 with a comment period running from October 21, 2020 – November 4, 2020 (15 days).

Note that Consolidated Plan requirements usually require a 30-day citizen comment period however, HUD waived certain requirements in response to COVID-19, and the requirement for citizen participation was reduced from 30 days to a minimum of 5 days. The Plan was presented to the City Council on November 5, 2020, giving the public another opportunity to provide comments.

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	Public Hearing/Other	Minorities Persons with disabilities Non-targeted/broad community	5 attendees	No comments received	N/A	https://www.pbgfl.com/672/Community-Development-Block-Grant
2	Survey	Minorities Persons with disabilities Non-targeted/broad community	58 responses	Respondents provided comments on the level on need for CDBG-eligible activities and prioritization of needs. Survey results attached.	All accepted	N/A

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment section of the Plan identifies the needs in the areas of affordable housing, community development, homelessness, and non-homeless special needs. The Needs Assessment is the basis for developing the Strategic Plan and assists the City in targeting resources. The Needs Assessment is divided into the following sections:

Housing Needs Assessment – The Housing Needs Assessment section includes an analysis of data from several sources including the 2014-2018 American Community Survey (ACS) and 2011-2015 Comprehensive Housing Affordability Strategy (CHAS). The CHAS data demonstrates the extent of housing need by household income level, to identify the most common housing problems experienced by low- and moderate-income households. The Housing Needs Assessment also includes a review of housing need by race or ethnicity to determine if any group has a disproportionately greater need.

It is important to understand key terms utilized in this section of the Plan including:

- HUD Area Median Family Income (HAMFI) – The median family income calculated by HUD in order to determine Fair Market Rents and income limits for HUD programs. Area Median Income (AMI) is also used to refer to HAMFI.
- Housing Cost Burden – Households spending greater than 30% of their total gross income on housing costs.
- Severe Housing Cost Burden – Households spending greater than 50% of their total gross income on housing costs.
- Overcrowding – Households having more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Severe overcrowding – Households having more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Lacking complete kitchen facilities – Kitchen facilities lacking a sink with piped water, a range or stove, or a refrigerator.
- Lacking complete plumbing facilities – Households without hot or cold piped water, a flush toilet and a bathtub or shower.
- Small Family Households – A family with 2 to 4 people residing in a household.
- Large Family Households – A family with 5 or more people residing in a household.

Public Housing – One of the key sources of affordable housing in any community is public housing. The City of Palm Beach Gardens does not have a public housing agency within its boundaries, however residents in need of housing assistance may benefit from programs operated by the Palm Beach County Housing Authority. This section of the Plan compares the housing needs of public housing residents, housing choice voucher holders, and applicants on the waiting list for public housing to the housing needs of the population at large.

Homeless Needs Assessment – In this section of the Plan, data available at the county level is examined to identify the extent of homelessness. According to the 2020 Point-In-Time (PIT) count, there were 1,510 persons experiencing homelessness in Palm Beach County. Few of these individuals were counted in Palm Beach Gardens.

Non-Homeless Special Needs Assessment – This section of the Plan includes a review of the characteristics of special need populations including elderly persons, persons with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons with HIV/AIDS, and their need for housing assistance and supportive services. Palm Beach Gardens has a significant elderly population making up approximately 30% of the City’s residents, compared to 24% in the county, and 21% in the state.

Non-Housing Community Development Needs – Based on information gathered through input from stakeholders who participated in the 2020 Consolidated Plan survey, an analysis of the City’s non-housing community development needs is conducted in this section of the Needs Assessment. Survey respondents were able to rank the need for CDBG-eligible activities to identify high priority needs.

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

Summary of Housing Needs

When developing the community’s housing goals for the next five years, the City took into consideration household type, size, and composition, as well as the cost and condition of the existing housing units. The data provided in this section of the Plan enables the City to identify the number and type of families or individuals in need of housing assistance. The City uses this information as well as input from residents and community stakeholders to develop a comprehensive strategy for addressing the needs of its residents. The quantitative data along with local knowledge assists the City with targeting resources to increase the supply of affordable housing and address other housing needs for all income levels and categories of persons affected.

To determine housing need it is important to analyze population trends and projections and the income characteristics of residents. Between 2009 to 2018, the City of Palm Beach Gardens experienced a 13% population growth, increasing from 48,452 to 54,528 persons. In 2009 the American Community Survey (ACS), conducted by the U.S. Census Bureau, identified 22,421 households in the City which increased to 24,090 by 2018, an increase of 7%. The median household income increased by 14% between 2009 and 2018, from \$70,283 to \$80,426. The increase in the overall population and in the number of households as well as the projected growth to 62,087 residents by 2025 as estimated by the Shimberg Center for Housing Studies supports the need for additional housing units including affordable housing units to meet the need of the vulnerable population.

Demographics	Base Year: 2009	Most Recent Year: 2018	% Change
Population	48,452	54,528	13%
Households	22,421	24,090	7%
Median Income	\$70,283.00	\$80,426.00	14%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2014-2018 ACS (Most Recent Year)

Table 6 provides data on household type by income level. The data indicates that among all households residing within the City of Palm Beach Gardens, 7,390 (32%) are small family households (2-4 members) and 604 (3%) are large family households (5 or more members). The remaining are non-family households such as persons living alone or with nonrelatives. Approximately 11,009 (48%) households include an elderly person: 6,179 (27%) of the households contain at least one person 62-74 years of age and 4,830 (21%) contain at least one person who is age 75 or older. There are 1,822 (8%) households containing one or more children 6 years old or younger. Of all the households, 13,302 (58%) are low- and moderate-income (0-80% AMI).

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,950	2,020	3,105	2,275	13,595
Small Family Households	310	535	750	635	5,160
Large Family Households	0	50	95	44	415
Household contains at least one person 62-74 years of age	490	474	1,050	535	3,630
Household contains at least one person age 75 or older	515	625	850	530	2,310
Households with one or more children 6 years old or younger	33	180	270	165	1,174

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

HUD's Comprehensive Housing Affordability Strategy (CHAS) data breakdowns the extent of housing problems and housing need by household type and income level. Among the housing problems categorized in Table 7, the most common housing problem residents of Palm Beach Gardens face is severe housing cost burden.

Based on the CHAS data, housing cost burden is more prevalent among homeowners than renter households. Of the residents who are severely housing cost burdened, paying more than 50% of their income for housing costs, 1,465 are renters and 2,240 are homeowners. Housing cost burdened households paying more than 30% of their income towards housing costs consist of 1,030 renters and 1,240 homeowners.

Additionally, the population that experiences the greatest level of severe housing cost burden are extremely low-income (0-30% AMI) and very low-income (30% - 50% AMI) households.

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	30	30	20	20	100	45	0	15	0	60
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	0	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	30	29	0	59	0	4	75	24	103
Housing cost burden greater than 50% of income (and none of the above problems)	675	490	230	70	1,465	760	720	580	180	2,240

	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
Housing cost burden greater than 30% of income (and none of the above problems)	0	95	510	425	1,030	95	245	430	470	1,240
Zero/negative Income (and none of the above problems)	85	0	0	0	85	175	0	0	0	175

Table 7 – Housing Problems Table

Data 2011-2015 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	700	550	290	90	1,630	805	725	675	205	2,410
Having none of four housing problems	70	170	640	790	1,670	115	575	1,505	1,195	3,390
Household has negative income, but none of the other housing problems	85	0	0	0	85	175	0	0	0	175

Table 8 – Housing Problems 2

Data 2011-2015 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	175	235	300	710	100	230	235	565
Large Related	0	39	45	84	0	10	50	60
Elderly	295	185	180	660	535	579	615	1,729
Other	220	185	270	675	265	150	145	560
Total need by income	690	644	795	2,129	900	969	1,045	2,914

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

Tables 9 and 10 provide additional detail on cost burden and severe cost burden for low-and moderate-income households (0-80% AMI) and shows that a total of 5,043 households (2,129 renters and 2,914 owners) are experiencing cost burden greater than 30%. This includes 3,589 households that are severely cost-burdened (1,469 renters and 2,120 owners).

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	175	195	95	465	100	210	170	480
Large Related	0	4	0	4	0	10	20	30
Elderly	295	165	75	535	440	360	310	1,110
Other	220	160	85	465	265	140	95	500
Total need by income	690	524	255	1,469	805	720	595	2,120

Table 10 – Cost Burden > 50%

Data 2011-2015 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	0	30	4	0	34	0	4	70	4	78
Multiple, unrelated family households	0	0	25	0	25	0	0	4	20	24
Other, non-family households	10	0	0	0	10	0	0	0	0	0
Total need by income	10	30	29	0	69	0	4	74	24	102

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room and a severely overcrowded household as one with more than 1.50 occupants per room. Overcrowding is rare in Palm Beach Gardens but can be seen in both renter and homeowner households. Single family households are most likely to be overcrowded. Low income owners (50%-80% AMI) have the greatest incidence of overcrowding.

	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	30	115	130	275	4	65	135	204

Table 12 – Crowding Information – 2/2

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

According to the 2018 ACS 5-Year estimates, there are 7,811 single person households in Palm Beach Gardens, which represents 32.4% of all occupied housing units. Approximately 29.9% of owner households and 38.9% of renter households are single person households.

HUD does not provide data on the income level of single person households; however, the 2018 ACS 5-Year estimates shows that the median non-family household income in the last 12 months is \$50,236, which is drastically lower than the median income for the entire City. Lower earnings may indicate a need for housing assistance.

In addition, Table 9 above displays the number of households with housing cost burden by household type including the category 'other households.' 'Other households' is defined as all households other than small related, large related, and elderly households and includes single person households. Based on the data in Table 9, there are 1,235 low- and moderate-income households classified as 'other households' experiencing cost burden and need housing assistance. This represents approximately 5% of the total households within the City of Palm Beach Gardens.

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.

Disabled Families in Need of Housing Assistance

The number of persons identified as having a disability is based on self-disclosure to the U.S. Census Bureau. The subpopulations of persons with disabling conditions include hearing or vision impairment, ambulatory limitation, cognitive limitation, and self-care or independent living limitation. The 2018 ACS 5-Year estimates indicates that, within the City of Palm Beach Gardens, 6,199 (11%) persons 18 years of age and older have a disability.

It is difficult to estimate the number of families with a disabling condition in need of housing assistance. However, data on households that live below the poverty level and households that qualify for other assistance programs may be indicative of the need for housing assistance. The following 2018 ACS data indicate that there are an estimated 500 disabled families in Palm Beach Gardens that may be in need of housing assistance:

- There are 470 households that include a person with a disability that live below the poverty level.
- There are 283 households with one or more persons with a disability that receive Supplemental Nutrition Assistance Program (SNAP) benefits also known as food stamps.
- 492 households in Palm Beach Gardens receive Supplemental Security Income (SSI) benefits. The SSI program is designed to help aged, blind, and disabled people. According to a 2018 Shimberg Center for Housing Studies report, the average monthly benefit for SSI recipients is \$750. Recipients of SSI have a maximum affordable rent of \$225 and require 127% of income for a zero bedroom and 153% of income for a one-bedroom unit at fair market rent.

Victims of Domestic Violence in Need of Housing Assistance

The 2019 Florida Department of Law Enforcement (FDLE) Uniform Crime Report provided data on domestic violence offenses and arrests by the Palm Beach Gardens Police Department. There

were 81 arrests related to domestic violence offences that include: murder, rape, aggravated assault, simple assault, and intimidation.

Other than referencing county level data from the Point-in-Time (PIT) count, a count of sheltered and unsheltered people experiencing homelessness on a single night, and other data on homelessness from the Continuum of Care (CoC), there is no information available on the number of victims in need of housing assistance in Palm Beach Gardens.

The 2020 PIT count for Palm Beach County identified 188 persons experiencing homelessness who were also victims of domestic violence. Among the survivors experiencing homelessness during the 2020 count, 141 individuals were staying at a sheltered location and 47 individuals remained in an unsheltered at the time of the Count.

According to the FY2019 HUD CoC Competition NOFA full Collaborative Application for FL-605 West Palm Beach/Palm Beach County CoC, the CoC reported that there are 1,591 domestic violence survivors within the CoC's geographic area who are in need of housing or services. This data is calculated by the number of Hotline calls from domestic violence survivors who are seeking shelter or housing within the last year. Survivors who are experiencing homelessness can access the housing crisis response system through two state certified domestic violence emergency shelters. Survivors are linked to the CoC's Homeless Resource Center to access CoC-related housing services, including Rapid Rehousing programs specific to serving persons fleeing from domestic violence.

What are the most common housing problems?

Housing problems are defined within categories that include: substandard housing (households lacking complete kitchen or plumbing facilities), overcrowding (more than 1.01- 1.5 persons per room), severe overcrowding (more than 1.51 persons per room), cost burden (more than 30% of the household's gross income is spent on housing costs), severe cost burden (more than 50% of the household's gross income is spent on housing costs), and zero/negative income households who cannot be cost burdened but still require housing assistance.

Below, ranked in descending order, are the Housing Problems in Palm Beach Gardens:

- Housing cost burden greater than 50% of income (and none of the above problems):
 - Renter: 1,465
 - Owner: 2,240
- Housing cost burden greater than 30% of income (and none of the above problems):
 - Renter: 1,030
 - Owner: 1,240

- Zero/negative Income (and none of the above problems):
 - Renter: 85
 - Owner: 175
- Overcrowded - With 1.01-1.5 people per room (and none of the above problems):
 - Renter: 59
 - Owner: 103
- Substandard Housing:
 - Renter: 100
 - Owner: 60
- Severely Overcrowded >1.51 people per room (and complete kitchen and plumbing):
 - Renter: 0
 - Owner: 0

Severe housing cost burden is the most common housing problem among City of Palm Beach Gardens residents. The Housing Need Summary tables shows that the number of households with severe housing cost burden and housing cost burden far exceed all other housing problems. Almost 6,000 households with income below 100% AMI spend more than 30% of their income on housing costs and require housing assistance. Another 260 households with zero or negative income who cannot actually have a cost burden, also require housing assistance. Those households with zero or negative income all fall within the 0-30% AMI income category, for both renters (85 households) and owners (175 households).

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

Overall, low-income households (50-80% AMI) have the greatest rate of cost burden with owners experiencing a higher rate of cost burden than renters. Tables 9 and 10 display the number of households with housing cost burdens more than 30% and 50%, respectively, by household type, tenure, and household income. Elderly households experience a higher level of need in terms of cost burden and severe cost burden. Approximately 2,390 elderly households (1,729 owners and 660 renters) are cost burdened including 1,645 (1,110 owners and 535 renters) who are severely cost burdened.

Overcrowding impacts owners more than renters in the City of Palm Beach Gardens. There are 69 renter households and 102 owner households that are overcrowded. Table 11 shows that single-family households have the highest rate of overcrowding in relation to multiple, unrelated family households and other, non-family households in both renter and owner categories. Overcrowding affects households at all income levels however households within the 50%-80% AMI category experience overcrowding at the highest rates.

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

According to the data in Table 6 in this section, there are 9,350 households living at or under 100% HAMFI in the City. Within this spectrum, there are 1,950 extremely low-income (ELI) households, 2,020 households with income between 30-50% HAMFI, 3,105 households with income between 50-80% HAMFI, and 2,275 households with income between 80-100% HAMFI. There are 648 households (7%) whose income is less than 100% HAMFI with one or more children six years old or younger, of which 33 are extremely low-income households.

Generally, extremely low-income households spend most of their income on housing costs and do not have sufficient funds to cover other basic expenses such as food, medication, or transportation. When an emergency occurs, these households may not have the financial resources available, straining the already limited income, which can then result in a housing crisis. Long-term needs include employment training, educational programs, and access to jobs that pay decent wages. For those families with children that are not yet school-aged, affordable high-quality childcare and early childhood programs are needed.

The best practice to assist individuals and families to prevent homelessness includes addressing their short-term or immediate needs and long-term needs with financial assistance and supportive services that will help them maintain their current housing and eventually sustain self-sufficiency. Financial assistance can be rent subsidies and utility assistance for renter households and temporary financial assistance for foreclosure prevention for owner households.

Regarding individuals and families who are experiencing a homeless episode, the best practice is to quickly identify and re-house those persons. Rapid re-housing is a permanent housing intervention, that incorporates housing search and relocation services and short- and medium-term rental assistance to move homeless persons as rapidly as possible back into permanent housing.

According to the HUD 2019 CoC Homeless Assistance Programs Housing Inventory Count Report for FL-605 West Palm Beach/Palm Beach County CoC, there are 8,519 rapid re-housing beds and of those, there are 108 family units comprised of 354 family beds, 165 adult only beds, and of the total 89 beds for youth.

As the rapid re-housing program provides a limited time of assistance determined by individual need through use of progressive engagement strategies. Housing stabilization case managers should be linking participants to on-going community-based services as their role phases out over time. These on-going services shift focus on housing stabilization to housing retention and other medical, mental health, education, or employment services intended to help the household continue maintaining their housing once they are no longer eligible to receive the rental assistance and supports provided by the rapid rehousing program. These services can address long-term needs such as job training and placement services to increase earning potential, behavioral health services, medical, long-term housing supports, childcare, benefit acquisition (mainstream benefits like Medicaid, SSI, or TANF), and education.

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:

The City of Palm Beach Gardens does not provide estimates of at-risk populations.

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

Housing characteristics that indicate instability and increased risk for homelessness include a lack of housing that is affordable and available to households of various income levels; housing cost burden, which is the number one housing condition within the City and directly impacts elderly persons and persons with disabilities who are living on SSI or SSDI; low vacancy rates which lead to more restrictive tenant screening criteria, overcrowding, and substandard housing conditions.

Discussion

Renters and homeowners residing in the City of Palm Beach Gardens are experiencing high levels of housing cost burden. According to the 2018 Palm Beach County Asset Limited, Income Constrained, Employed (ALICE) Report produced by the United Way, 34% of the residents in the City of Palm Beach Gardens are considered ALICE/poverty-level households. To this end, the City of Palm Beach Gardens and its residents would benefit from wages that align with the cost of living for the area and housing options that accommodate a variety of household incomes.

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

Introduction

This section of the Consolidated Plan assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of the jurisdiction as a whole.

HUD provides data on the presence of housing problems and has determined that a disproportionally greater need exists when the members of a racial or ethnic group at a given income level experience housing problems at a rate of 10 percentage points or more than the income level as a whole.

In Palm Beach Gardens, White households experience a similar level of housing problem to the jurisdiction as a whole at all income levels. In contrast, people of color have a higher level of need than White households across all income categories, with the exception of extremely low-income households (0-30% AMI).

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	1,605	89	260
White	1,455	64	210
Black / African American	55	20	0
Asian	55	0	4
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	44	0	50

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS

Source:

*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	1,610	410	0
White	1,245	410	0
Black / African American	140	0	0
Asian	24	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	185	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*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	1,895	1,205	0
White	1,545	1,080	0
Black / African American	165	50	0
Asian	10	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	169	50	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*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	1,185	1,090	0
White	970	880	0
Black / African American	90	35	0
Asian	0	80	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	124	80	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*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

Extremely Low-Income Households (<30% AMI)

In Palm Beach Gardens, 82.14% of all extremely low-income households have a housing problem. Based on the HUD definition of disproportionately greater need, extremely low-income Asian households have a disproportionately greater need with 93.22% experiencing a housing problem.

Very Low-Income Households (30%-50% AMI)

In the very low-income category, 80% of all households has one or more of the four housing problems. Three racial or ethnic groups reported disproportionately high housing problems: 100% of very low-income Black/African American, Asian, and Hispanic households have a disproportionately greater need.

Low Income Households (50%-80% AMI)

In the low-income category, 61.13% of all households have at least one housing problem and three racial and ethnic groups have a disproportionately greater need. All (100%) low-income Asian households have a housing problem, 76.74% of Black/African American households, and 77.17% of Hispanic households.

Moderate Income Households (80%-100% AMI)

Generally, as income increases households have a lower level of housing need. Approximately half (52.09%) of moderate-income households in the City have a housing problem. There is one racial and ethnic group with a disproportionately greater need at this income level. Approximately 72% of moderate-income Black/African American households have a significantly higher level of need.

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

Introduction

This section of the Consolidated Plan assesses the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of the jurisdiction as a whole.

HUD provides data on the presence of severe housing problems and has determined that a disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience severe housing problems at a rate of 10 percentage points or more than the income level as a whole.

Overall, extremely low-income, and low-income households in Palm Beach Gardens experience a much higher level of severe housing problems than other income categories. Over 77% of extremely low-income households have a severe housing problem while only 13% of moderate-income households have a severe housing problem.

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	1,505	185	260
White	1,360	160	210
Black / African American	55	20	0
Asian	55	0	4
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	44	0	50

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 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	1,275	745	0
White	985	670	0
Black / African American	125	15	0
Asian	24	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	125	60	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*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	965	2,145	0
White	845	1,775	0
Black / African American	74	140	0
Asian	10	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	39	180	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*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	295	1,985	0
White	265	1,580	0
Black / African American	0	125	0
Asian	0	80	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	24	185	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*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

Extremely Low-Income Households (<30% AMI)

In Palm Beach Gardens, 77.18% of extremely low-income households have at least one severe housing problem. There is one racial or ethnic group disproportionately impacted by severe housing problems in this income category. Approximately 93% of extremely low-income Black/African American households report a severe housing problem.

Very Low-Income Households (30%-50% AMI)

Over 63% of very low-income households in the City has one or more of the four severe housing problems. 100% of very low-income Asian households and 89.29% of very low-income Black/African American households have a disproportionately greater need.

Low Income Households (50%-80% AMI)

In the low-income category, 31.03% of all households have at least one severe housing problem and one racial or ethnic category has a disproportionately greater need. All (100%) low-income Asian households have a severe housing problem.

Moderate Income Households (80%-100% AMI)

There are no moderate-income racial or ethnic groups with a disproportionate housing need.

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

Introduction:

As discussed in earlier sections of this Plan, housing cost burden is the most common housing problem in the City of Palm Beach Gardens. Over 36% of all households in the City spend more than 30% of their gross income on housing costs.

Like all other housing problems examined, members of racial or ethnic groups may experience disproportionate housing cost burden. That is, a racial or ethnic group experiencing cost burden at a greater rate (10 percentage points or more) than the jurisdiction as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	14,550	3,890	4,230	270
White	13,015	3,205	3,680	220
Black / African American	190	255	225	0
Asian	395	70	70	4
American Indian, Alaska Native	30	0	0	0
Pacific Islander	0	0	0	0
Hispanic	840	315	239	50

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

According to the HUD data, approximately 36.6% of all households in Palm Beach Gardens spend 30% or more of their income on housing costs. Approximately 17% of these households spend between 30%-50% of their income on housing and over 18% are severely cost burdened, spending more than 50% of their income on housing.

There is one racial or ethnic group that is disproportionately cost burdened in the City. Approximately 38% and 34% of Black/African American households are cost burdened and severely cost burdened, respectively.

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?

The following income categories have a racial or ethnic group that has a disproportionately greater need:

Housing Problems

ELI – Asian

VLI – Black/African American; Asian; Hispanic

LI – Black/African American; Asian; Hispanic

MI – Black/African American

Severe Housing Problems

ELI – Black/African American

VLI – Asian; Black/African American

LI – Asian

MI – None

Cost Burden

Cost Burden – Black/African American

Severe Cost Burden – Black/African American

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

No additional needs were identified.

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

No, none of these racial or ethnic groups are concentrated in any specific neighborhoods in the City.

NA-35 Public Housing – 91.205(b)

Introduction

Public Housing is housing owned and operated by a public housing agency to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. There is no public housing agency within the boundaries of the City of Palm Beach Gardens. However, the Palm Beach County Housing Authority’s (PBCHA) jurisdiction encompasses all 39 municipalities within Palm Beach County. For this reason, the information in the tables below provide data on the number and type of public housing units and characteristics of public housing residents served by PBCHA.

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	2,429	0	414	2,843	395	2,034	0	0	128

Table 22 - Public Housing by Program Type

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

Data Source: Palm Beach County Housing Authority (2020)

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	17,432	0	17,907	13,936	14,236	18,052	0	0
Average length of stay	10	0	5	8	1	10	0	0
Average Household size	3	0	3	3	3	3	0	0
# Homeless at admission	5	0	26	31	0	0	0	0
# of Elderly Program Participants (>62)	547	0	151	698	165	382	0	0
# of Disabled Families	854	0	202	1,056	183	671	0	0
# of Families requesting accessibility features	0	0	0	0	0	0	0	0
# of HIV/AIDS program participants	251	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: Palm Beach County Housing Authority (2020)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	413	0	112	525	63	346	0	0	41
Black/African American	1,870	0	298	2,168	312	1,556	0	0	82
Asian	0	0	0	0	0	1	0	0	0
American Indian/Alaska Native	0	0	0	0	0	1	0	0	0
Pacific Islander	146	0	0	146	20	122	0	0	2
Other	0	0	4	4	0	0	0	0	3

***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: Palm Beach County Housing Authority (2020)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	389	0	91	480	63	325	0	0	20
Not Hispanic	2,040	0	323	2,363	332	1,709	0	0	108

***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: Palm Beach County Housing Authority (2020)

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

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any housing that receives federal assistance, including public housing. A review of PBCHA's Annual Plan for 2020-2021 indicated that there were 2,231 families on the waiting list for public housing as of August 31, 2020 and that 278 of those families reported having a disability. Public housing tenants and applicants with a disability have a need for affordable and accessible units as well as a need for improved access to social services.

To address the needs of tenants and applicants with disabilities the PBCHA will:

- Conduct a Green Physical Needs Assessment (GPNA) to include a Section 504 Needs Assessment and continue to carry out the ADA modifications needed in public housing based on the GPNA.
- Provide higher payment standards for families needing ADA units.
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available.
- Affirmatively market to local non-profit agencies that assist families with disabilities.

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

The most immediate needs of PBCHA residents and voucher holders is the availability of affordable housing. Other needs include jobs, improvement in housing quality, increase in access to public services, and childcare services.

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

The housing needs of voucher holders in Palm Beach Gardens are likely very different from the population at large. Voucher holders in Palm Beach County are extremely low-income (<30% of area median income) and earn less than \$18,000 annually while the majority of Palm Beach Garden's residents earn more than 100% of the area median income, that is over \$79,100 based on FY 2020 HUD Income Limits for the West Palm Beach-Boca Raton, FL HUD Metro FMR Area.

As discussed in the Housing Needs Assessment section of this Plan, the most common housing problem in the City is a lack of affordable housing which impacts households at all income levels. However, extremely low-income households, such as public housing residents and voucher holders, have a disproportionately greater level of housing need. Lower income households in the City also have a higher incidence of overcrowding. This is likely the case for voucher holders who have an average household size of 3 persons compared to 2.25 persons for the population at large. Public housing residents and voucher holders also face a need for improved housing conditions.

Discussion

While there are no public housing developments in Palm Beach Gardens, approximately 60 households utilize the Section 8 Housing Choice Voucher (HCV) program. Housing choice vouchers enable a low-income family to rent a housing unit from a private landlord that agrees to rent under the program. The family pays the difference between the rent charged by the landlord and the housing subsidy paid by the public housing agency.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The homeless response in Palm Beach Gardens is coordinated by the FL-605 West Palm Beach/Palm Beach County CoC, which recognizes the Homeless and Housing Alliance of Palm Beach County (HHA) as the Lead Agency. The HHA is responsible for developing and executing the countywide housing crisis response system strategy with a network of direct service providers, which incorporates the City of Palm Beach Gardens, and is in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. The HHA’s housing crisis response system components include homeless prevention, outreach and assessment, emergency shelter, transitional housing, supportive services, Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH).

Data on homelessness is available for the CoC jurisdiction, that is, Palm Beach County as a whole. A breakdown of the most recent count of persons experiencing homelessness by zip code recorded three persons experiencing homelessness in zip code 33410.

Highlighted in the data table below, HHA targets persons who meet HUD’s Homeless Definitions, Category 1: Literally Homeless (the household as an individual or family who lacks a fixed, regular, and adequate night-time residence); and Category 4: Individual or family who is fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions.

The Homeless Coalition of Palm Beach County supports the CoC’s efforts through their mission of “building coalitions and inspiring pathways to help end homelessness.” The Homeless Coalition spearheads advocacy efforts, funds programs, and encourages collaboration among stakeholders in the housing crisis response system.

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)	270	6				
Persons in Households with Only Children	0	3				
Persons in Households with Only Adults	210	1021				
Chronically Homeless Individuals	21	218				
Chronically Homeless Families	0	2				
Veterans	35	65				
Unaccompanied Child	0	3				
Persons with HIV	8	18				

Table 26 - Homeless Needs Assessment. Source: HUD 2019 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations, FL-605 West Palm Beach/Palm Beach County CoC, Point in Time Count, January 23, 2020.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Black or African American	293	417
White	144	572
Asian	3	4
American Indian or Alaska Native	6	13
Pacific Islander	0	6
Multiple Races	34	18
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	66	109
Non-Hispanic	414	921

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations, FL-605 West Palm Beach/Palm Beach County CoC, Point in Time Count, January 23, 2020.

FL-605 West Palm Beach/Palm Beach County CoC’s 2019 System Performance Measures (SPM) demonstrate the extent of homelessness across the region by evaluating annual data versus the one-day Point-in-Time (PIT) count. In FY 2019, there were 1,395 persons experiencing first time homelessness who entered Emergency Shelter, Safe Haven, Transitional Housing, and Permanent Housing projects with no prior enrollments in HMIS within 24 months prior to their entry during the reporting year, which was a decrease from the previous year (2018) by 178 individuals. Additionally, the FY 2019 data showed a decrease in persons who exited Street Outreach to Permanent Housing (PH) destinations. Whereas in 2018, 417 consumers exited to Street Outreach to PH, in 2019 230 persons exited Street Outreach directly to PH, which is a reduction of 187 persons obtaining housing from literal homelessness. Of the consumers participating in Permanent Housing projects (except for Rapid Re-housing), 96% of housing participants achieved housing retention or were successfully exited. Lastly, based on FY 2019 SPM data, the average length of time persons remained in Emergency Shelter or Safe Haven was 61 nights, which was the same as reported during the FY 2018 SPM reporting period.

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

According to the 2020 PIT Count, there were a total of 81 family households of which 78 were staying in a sheltered location and three were unsheltered. These family households are comprised of 276 persons, of which 270 individuals were sheltered and six individuals remained unsheltered. Veterans experiencing homelessness total 100 individuals with 35 persons in a sheltered location and 65 remaining unsheltered at the time of the count. There are 21 veterans who are considered chronically homeless. There are two additional family members who are non-veterans within the 65 veteran households. The PIT Count data does not provide further family composition details for the veteran subcategory. Of the 188 persons who experienced domestic violence, 141 persons were staying in shelter and 47 persons were staying in an unsheltered location. Four parenting youth households were identified at the time of the count, totaling 12 individuals. Among this subpopulation, there were five parenting youth (ages 18-24 years old) and seven children who are under 18 years old and with parents under the age of 25 years old.

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

This section is based on the 2020 Point in Time Count data. Persons identifying as White account for the largest population of persons experiencing homelessness with 716 individuals, 144 persons residing in a sheltered location and 572 individuals remaining unsheltered. Among the 710 Black-African American persons identified during the PIT Count, 293 resided in a sheltered location and 417 persons remained unsheltered. Of the seven persons identifying as Asian, three individuals were staying in a sheltered location and four people remained unsheltered. Among the 19 persons who identify as American Indian or Alaska Native, six were located in a sheltered location and 13 people were unsheltered. All six Native Hawaiian or Other Pacific Islander persons were staying in an unsheltered location. Fifty-two individuals identify as being Multiple Races, with 34 individuals residing in shelter and 18 remaining unsheltered at the time of the count. Among those staying in a sheltered location, persons identifying as Black or African American make up 61% of the total sheltered individuals. Persons identifying as White make up 56% of all persons experiencing unsheltered homelessness. Of the total 1,510 persons experiencing homelessness at the time of the 2020 PIT Count within the FL-605 West Palm Beach/Palm Beach County CoC geographic area, 68% of individuals (1,027) are experiencing unsheltered homelessness and 32% (480) are sheltered either in Emergency Shelter or Transitional Housing.

Persons identifying as Hispanic/Latino make up 14% of the sheltered population, totaling 66 individuals. Hispanic/Latino persons make up 11% of persons experiencing unsheltered

homelessness, which totals 109 individuals. Conversely, persons of Non-Hispanic/Non-Latino ethnicity who are sheltered make up 86% of the sheltered population, or 414 individuals and 89% of the unsheltered population (921 persons). In conclusion, 88% of all persons experiencing homelessness at the time of the 2020 PIT Count within the geographic area are of Non-Hispanic/Non-Latino ethnicity.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based on the 2020 PIT count, the FL-605 West Palm Beach/Palm Beach County CoC identified 1,510 persons experiencing homelessness. The total number of persons experiencing homelessness is comprised of 480 sheltered persons and 1,030 unsheltered persons. Of the 480 persons staying in a sheltered location, 361 were located at Emergency Shelter and 119 persons remained in an unsheltered location at the time of the Count. Unsheltered persons experiencing homelessness are overrepresented as 68% of all individuals who lack housing are residing in an unsheltered location. The unsheltered population includes 570 individuals, 55% of the total, who are between the ages of 25 and 54 years old. The second most represented age group of people experiencing unsheltered homelessness are persons between the age of 55-61 years old, totaling 256 individuals (25%). In 2020, there were 1,234 single individuals and 276 persons in family households identified at the time of the Count. Males account for the greatest gender subpopulation totaling 1,026 persons. There were 480 persons who identified as female, two individuals identifying as a Transgender person, and two individuals identifying as Gender Non-Conforming persons.

The 93 unaccompanied youth households are comprised of 49 unaccompanied sheltered youth and 44 unaccompanied unsheltered youth. Among unaccompanied youth, 90 persons were age 18 to 24 years old and three were unaccompanied children under the age of 18 years old.

Based on the 2020 PIT Count, the following subpopulation data was self-disclosed by the respondent:

- 88 sheltered persons/185 unsheltered persons with a mental illness
- 53 sheltered person/175 unsheltered persons with a substance use disorder
- 37 unsheltered persons with a developmental disability
- 8 sheltered persons/18 unsheltered persons with HIV/AIDS
- 141 sheltered person/47 unsheltered persons who are victims of domestic violence

The 2020 PIT Count identified 220 persons living in an unsheltered location and 21 persons residing in Emergency Shelter who are identified as chronically homeless. Among persons considered chronically homeless, 86 individuals experienced four or more episodes of homelessness within three years and 134 individuals have one homeless episode lasting one year or longer. All individuals who meet the criteria of chronic homelessness also are a person with a disability.

Discussion:

Monitoring the housing crisis response system's effectiveness, the CoC monitors performance based on HUD's System Performance Measure (SPM) benchmarks and the ability to identify how quickly persons experiencing homelessness are identified and rehoused is an important measure of how the CoC's structure is making homelessness rare, brief, and one-time in the region. Understanding that the total number of people who lack housing is far reaching beyond the City of Palm Beach Gardens, the number of unsheltered and sheltered persons indicates that there is a need for housing that is affordable and available for persons living in Palm Beach County. Although increasing capacity within the shelter system could temporarily assist households in a crisis, it is not a permanent solution. Therefore, to quickly rehouse persons staying in Emergency Shelter, Safe Haven, Transitional Housing, or experiencing unsheltered homelessness, there must be housing available that a person can obtain to quickly exit from homelessness and into permanent housing. By evaluating HMIS data to determine the success of projects and system as a whole, the CoC is able to identify areas of improvement and create strategies which will improve their ability to prevent and end homelessness in the City of Palm Beach Gardens and the entire Palm Beach County.

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

Introduction:

Persons with special needs and households experiencing homelessness in the City of Palm Beach Gardens are generally linked to Palm Beach County resources to fulfill their service needs. The subpopulations within this category are vulnerable and at risk of housing insecurity due to limited income and service needs. However, residents can access information about available resources specific to their needs by calling the 2-1-1 Helpline or contacting the City of Palm Beach Gardens Community Action Support Team (CAST). Tasked with identifying solutions, resources, and programs to support City of Palm Beach Gardens residents, the CAST engaged with residents, the business community, and external agencies to pinpoint resources, such as assistance programs. This section of the Plan reviews the latest data from the ACS and other data sources, to ensure the City has an accurate representation of the extent of non-homeless special needs in the area.

Describe the characteristics of special needs populations in your community:

Elderly

For the purposes of this report, persons 65 years of age and older are considered elderly. The City of Palm Beach Gardens is home to a total of 16,247 persons at or above the age of 65, according to the 2018 ACS 5-year estimates. This represents approximately 29.9% of the City's total population. Of the total 65 and over population, there are an estimated 4,337 individuals 65 years and older who also have a disability, 1,029 persons aged 65 and older living below the poverty level in Palm Beach Gardens, and 1.3% of residents who are 65 years of age and older receive Food Stamps/SNAP benefits. In the City, there are 9,961 housing units occupied by persons 65 years and older in which 8,450 residents (49%) reside in owner-occupied housing units and 1,511 persons (22.1%) are living in renter-occupied units.

Persons with Disabilities

The City of Palm Beach Gardens has a total of 6,343 persons (11.7% of the City's population) who have a disability, according to the 2018 ACS 5-Year estimates.

The ACS data provides details on the type of disability for the population.

- 4.1% (2,201 persons) have a hearing difficulty
- 1.6% (871 persons) have a vision difficulty
- 3.5% (1,810 persons) have a cognitive difficulty
- 6.6% (3,428 persons) have an ambulatory difficulty
- 2.7% (1,404 persons) have a self-care difficulty
- 5.4% (2,471 persons) with an independent living difficulty

Substance Abuse

The Department of Children and Families (DCF) is the lead agency responsible for coordinating a statewide system of Substance Abuse and Mental Health (SAMH) services, passing funding for treatment and services through regionally based Managing Entities (ME). The Southeast Florida Behavioral Health Network (SEFBHN) oversees the mental health and substance abuse system of care for indigent, uninsured, or underinsured persons in Indian River, Martin, Okeechobee, Palm Beach, and St. Lucie Counties. SEFBHN manages a network of direct service providing agencies that provide prevention, treatment, and recovery services. In FY 2018/2019, SEFBHN funded substance abuse services to 15,084 unduplicated adults and 6,328 unduplicated children. It should be noted that not all who received substance use treatment through SEFBHN's system of care live in Palm Beach County because the ME provides mental health and substance use services to an entire region comprised of five counties.

Domestic Violence

The 2019 Florida Department of Law Enforcement (FDLE) Uniform Crime Report provided data on domestic violence offenses and arrests by the Palm Beach Gardens Police Department. Analyzed data reports that there were 81 arrests related to domestic violence offenses that include: murder, rape, aggravated assault, simple assault, and intimidation.

Assessed during the 2020 PIT count, there were 188 victims of domestic violence identified as experiencing homelessness in Palm Beach County. One hundred and forty one of these individuals were staying in a sheltered location and 47 were unsheltered.

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

Elderly

The Palm Beach County Division of Senior Services (DOSS) maintains an office located in Palm Beach Gardens to accommodate the City's residents. DOSS provides services such as case management, Adult Protection Services, oversees Abuse, Neglect, and Exploitation cases, and offers a full continuum of services that support seniors in the Palm Beach Gardens community. Additional programs for elderly and seniors in Palm Beach Gardens include nutrition, respite care, companionship, assistance with in-home services, Emergency Home Energy Assistance for the Elderly Program (EHEAP), outreach, volunteering, personal care, emergency alert response, specialized medical services and supplies, caregiver training and support, and the provision of case aides.

The City of Palm Beach Gardens supports elderly residents through public services that include mental health and wellness activities at the senior center and home repair programs that allow elderly persons to age in place.

Persons with Disabilities

The Agency for Persons with Disabilities Southeast Region Office in Palm Beach County identifies the critical service needs as behavioral analysis and iBudget waiver support coordination. The Special Needs Advisory Coalition (SNAC) of Palm Beach County, established in 2015, and is part of a multi-funder community needs assessment to better understand the services and support for persons with special needs residing in Palm Beach County. Experts and community-based organizations worked together to develop innovative strategies to create a comprehensive, integrated system of care that meets the changing needs of persons with special needs/disability throughout their life span. These objectives include: developing an effective information and referral system, improving ability of families to navigate systems of assessment and services, increasing amount and improve coordination of funding, improving transition practices, increasing employment opportunities, expanding housing options, and improving advocacy and futures planning.

Substance Abuse

Aligned with the standards developed by Substance Abuse and Mental Health Services Administration (SAMHSA), Southeast Florida Behavioral Health Network and its direct service providers adopt evidence based practices and programs that assist consumers who are engaged in recovery and managing their substance use disorder. The essential components of a recovery support network are health, home, purpose, and community. The service array, for both adults and children, often include detoxification, inpatient treatment, residential treatment, assessment, case management, supportive housing, crisis support, skill building, peer support, and counseling.

Victims of Domestic Violence

Florida Department of Children and Families 2019-2020 Annual Capital Needs Assessment details that there is a need to increase emergency shelter and transitional housing capacity to provide services to persons fleeing domestic violence. The Florida Coalition Against Domestic Violence identifies the following essential services for victims of domestic violence: survivor focused safety plans, counseling and advocacy, information and referrals for persons seeking assistance, child and youth-specific activities, youth-targeted education, education and training for adults.

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

Persons with HIV/AIDS and Their Families

Palm Beach County, documented by Florida Health Charts reports that in 2018, there were 298 HIV cases in 2018, which is a rate of 20.7 per 100,000 people within a single year. Within the same reporting year, there were 97 AIDS cases at a rate of 6.7 per 100,000 people. Palm Beach County identified 53 individuals who died from HIV/AIDS in 2018. Among the persons who died from this disease are 12 White people, 41 persons who identify as Black or Other Races, 41 Hispanic individuals, and 50 Non-Hispanic individuals who died of HIV/AIDS. Thirty-one of those who died of HIV/AIDS were male and 22 were female. The data analysis demonstrates that African American persons have a higher rate of HIV/AIDS cases than Caucasians.

FL-605 West Palm Beach/Palm Beach County CoC identified 18 persons during the 2020 PIT Count who self-disclosed their HIV/AIDS diagnosis.

The Palm Beach County HIV Care Council services Palm Beach County residents living with HIV and AIDS. Located in City of Palm Beach Gardens is the Health Council of Southeast Florida which implements HIV education and prevention and services and supports for persons living with HIV/AIDS. This organization staffs Community Health Advocates who provide free HIV testing, medication assistance, linkage to primary or specialty care, connection to resources (food, transportation, health benefit enrollment assistance (Ryan White, private or marketplace insurance, etc.), and are advocates for consumers receiving services.

Discussion:

The City of Palm Beach Gardens relies on Palm Beach County and other state-funded programs to support persons with special needs in the community. Regardless of the population, all City of Palm Beach Gardens residents with special needs would benefit from housing that is affordable and available and increased opportunities for supportive services. Housing integration and community inclusion are essential components and targeted support services are valuable when working with persons with special needs. Implementation of best practices, specific to that person's individual needs, is essential to stability and recovery. Addressing the needs of consumers among multiple systems, who are often times overlapping, takes a collective approach to help a person achieve stability.

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

Describe the jurisdiction’s need for Public Facilities:

The public facilities category includes a range of activities to address non-housing community development needs such as community centers and parks that benefit low- or moderate-income neighborhoods. Approximately half of the respondents to the Consolidated Plan survey identified the following public facility needs as high priorities for Palm Beach Gardens:

- Public safety facilities (53%)
- Community centers and facilities (49%)
- Parks / Recreational facilities (48%)

How were these needs determined?

These needs were determined through a comprehensive citizen participation process including:

Stakeholder meeting: Stakeholders including residents and social service agencies serving the low- and moderate-income population were invited to attend a community meeting. The meeting served to provide information on the Five-Year Consolidated Plan, its process, and solicit input from stakeholders on priority needs.

Consolidated Plan survey results: Respondents to the PY 2020-2024 Consolidated Plan survey were asked to rank the public facility needs in Palm Beach Gardens. The categories of public facilities in the survey were child-care centers, community centers and facilities (youth centers, senior centers), community parks and recreational facilities, and public safety facilities (fire, polices, emergency management). Respondents could identify each public facility category as a high need, low need, no need, or don’t know.

Describe the jurisdiction’s need for Public Improvements:

The public improvement category includes a range of activities considered to be non-housing community development needs such as roads, water/sewer improvements, lighting, drainage, and other capital projects that benefit low- or moderate-income neighborhoods. Streets, sidewalks, water/sewer improvements were identified as high priorities for Palm Beach Gardens.

How were these needs determined?

These needs were determined through a comprehensive citizen participation process including:

Stakeholder meeting: Stakeholders including residents and social service agencies serving the low- and moderate-income population were invited to attend a community meeting. The

meeting served to provide information on the Five-Year Consolidated Plan, its process, and solicit input from stakeholders on priority needs.

Consolidated Plan survey results: Respondents to the PY 2020-2024 Consolidated Plan survey were asked to rank the public infrastructure needs including streets, sidewalks, and water/sewer improvements as a high need, low need, no need, or don't know. 70% of respondents identified public infrastructure as a high need, which included streets, sidewalks, and water/sewer.

Describe the jurisdiction's need for Public Services:

Public services address a broad range of needs including the provision of services for the mentally ill, developmentally disabled, elderly, and other groups such as persons with HIV/AIDS. Public services are often provided by non-profit agencies, usually in coordination with the City. The following public service needs have been identified as high priorities for Palm Beach Gardens:

- Crime prevention (61%)
- Mental health services (53%)
- Health services (52%)
- Senior services (49%)
- Domestic violence services (49%)

How were these needs determined?

These needs were determined through a comprehensive citizen participation process including:

Stakeholder meeting: Stakeholders including residents and social service agencies serving the low- and moderate-income population were invited to attend a community meeting. The meeting served to provide information on the Five-Year Consolidated Plan, its process, and solicit input from stakeholders on priority needs.

Consolidated Plan survey results: Respondents to the PY 2020-2024 Consolidated Plan survey were asked to rank the public service needs. There were 19 categories of public services included in the survey and the top five public services needs are listed above. Respondents could identify each public category as a high need, low need, no need, or don't know.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Housing Market Analysis section of the Plan provides a snapshot of the City's current housing stock and housing facilities. Housing market characteristics reviewed include the supply of housing, availability of affordable housing, housing cost and condition of housing units, and the supply of housing or facilities for persons with disabilities and persons experiencing homelessness. The Housing Market Analysis is divided into the following sections:

Number of Housing Units – The Housing Market Analysis begins with a basic count of the total number of housing units and occupied housing units in the City by property type, unit size, and tenure. There are 30,049 units in the City and analysis of the data indicate that the current housing supply does not meet the need of all the City's residents.

Cost of Housing – This section of the Plan compares the cost of housing in the City to household incomes to determine if there is a sufficient supply of affordable housing. Housing cost burden (unaffordability of housing) is the foremost housing problem in the City and the data in this section of the Plan further supports the need for programs that produce or preserve affordable housing.

Condition of Housing – The supply of quality, decent housing is shaped by the condition of the housing inventory. This section of the Plan analyzes the age of the housing, risk of exposure to lead-based paint, and presence of housing problems. These factors coupled with the definition of substandard housing, justify the need for housing rehabilitation activities.

Public and Assisted Housing – The affordable housing inventory in any jurisdiction typically includes units subsidized by federal, state, or local programs including public housing. Approximately 60 housing choice voucher holders reside in Palm Beach Gardens. The extensive waiting list for public housing units and vouchers demonstrates the gap in the availability of affordable housing countywide.

Homeless Facilities and Services – While Palm Beach Gardens has a small literal homeless population, there is a segment of the population that is at risk of homelessness. This section of the Plan provides an inventory of homeless facilities and services in the County. The central point of access for individuals and families experiencing homelessness being the Senator Philip D. Lewis Center in West Palm Beach.

Special Needs Facilities and Services – Persons with special needs such as elderly persons, and persons with disabilities may require supportive housing and services. This section of the Plan provides information on facilities and services that meet the needs of this subpopulation.

Barriers to Affordable Housing – It is the goal of the City to increase the supply of affordable housing for low- and moderate-income persons. To accomplish this goal the City must overcome any barriers to the creation of affordable housing. The City’s PY 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) identified actions that the City should take to overcome barriers to fair housing choice.

Non-Housing Community Development Assets – In addition to the non-housing community development needs identified in the Needs Assessment, the City also has economic development needs such as the need for employment training/education for workers to better align with the major employment sectors. Local economic trends are discussed in the section of the Plan as well as opportunities for economic growth.

Needs and Market Analysis Discussion – This section of the Plan summarizes key points from the Needs Assessment and Market Analysis in relation to areas of the City that have a low-income or minority concentration.

Broadband Needs of Housing occupied by Low- and Moderate-Income Households – Access to broadband is an essential need for individuals and families and should be equally available to low- and moderate-income households. The broadband services available to residents of the City are described in this section.

Hazard Mitigation - The supply of housing is directly impacted by the effects of natural disasters and other hazards such as climate change. Low- and moderate-income persons are more vulnerable to these effects and this section of the Plan discusses the natural hazard risks that this population faces including the risk of displacement due to a natural disaster.

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

Introduction

The purpose of the Market Analysis is to examine current housing market conditions in the City to identify any gaps in meeting the needs of residents. This section of the Plan provides an estimate of the current supply of housing and includes an examination of the existing housing inventory by property type, size, and tenure (owners/renters).

According to 2018 ACS data, there are 30,049 residential properties in the City comprised of primarily (64%) single-family structures. Multifamily units, which are generally more affordable, represent 35% of the total housing units. The majority (72%) of occupied units are owner-occupied. Additionally, there are relatively few smaller units, regardless of tenure, which also impacts the cost of housing. Only 1,636 (7%) of occupied units are 1 bedroom or less while 14,370 units (60%) are 3 or more bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	13,877	46.2%
1-unit, attached structure	5,377	17.9%
2-4 units	3,872	12.8%
5-19 units	4,315	13.8%
20 or more units	2,402	8.0%
Mobile Home, boat, RV, van, etc	386	1.2%
Total	30,049	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2014-2018 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	9	0%	132	2%
1 bedroom	219	1%	1,276	19%
2 bedrooms	4,814	28%	3,270	48%
3 or more bedrooms	12,201	71%	2,169	32%
Total	17,243	100%	6,847	100%

Table 27 – Unit Size by Tenure

Data Source: 2014-2018 ACS

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

Using CDBG funding, the City targets assistance to community members who, otherwise would not be able to attain the necessary housing supports due to their limited, fixed income or special needs. To help residents maintain their home affordably, the City dedicates funding that targets low- and moderate-income (LMI) households for home repair assistance. Additionally, through the Single Family Housing Rehabilitation Program, the City supports LMI households by removing housing hazards and providing accessibility for persons with disabilities.

In addition to the City’s housing program, Palm Beach Gardens residents may also benefit from county and state housing assistance programs.

Palm Beach County is the recipient of the State Housing Initiative Partnership (SHIP) funding, and City residents with incomes within HUD income limits can apply for funding to support various housing-related activities. The Palm Beach County Housing Authority (PBCHA) also supports low-income renters through the provision of housing choice vouchers.

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

There are no affordable housing units expected to be lost during the five years covered by this Plan.

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

Based on absolute numbers, the number of housing units (30,049) would appear to meet the needs of the 24,090 households who reside in the City. However, when housing costs and other housing problems are factored in, there is a gap in the supply.

Median income in the past 12 months for Palm Beach Gardens households was \$80,426 according to 2018 ACS data. According to the Zillow Home Value Index, the Palm Beach Gardens housing market is considered “hot” and the median value of homes currently listed for sale within the City is \$463,000, a 2.3% change over the past year. The median sale price of homes sold in the City is \$373,000 and the median rental price is \$2,500 per month.

To estimate the potential for housing cost burden based on the median income, a person should not be paying more than \$2,010 in housing expenses. Using the Zillow Home Value Index of \$392,965 for the current home value in Palm Beach Gardens, the estimated monthly mortgage plus housing-related expenses is \$2,394, which already exceeds 30% of the monthly median household income for the City’s residents. In the City, the median monthly rental price exceeds

30% of the monthly median household income, creating significant opportunities for cost burden. Therefore, regardless of whether residents rent or own their home, the median household income does not adequately support the needs of residents.

Another indicator of a housing shortage is homelessness. Based on the 2020 Point-in-Time (PIT) count conducted in January 2020, less than 100 people identified as experiencing homelessness in District 1 which includes the City of Palm Beach Gardens. If the current availability of housing units met the needs of the population, then there would be zero people without a home. Unfortunately, the City does not currently have the financial resources to support expansion of affordable housing development or the organizational structure that supports housing subsidies for the City's residents.

Describe the need for specific types of housing:

According to Table 27, zero-bedroom rental units make up 2%, and one-bedroom rental units make up 19% of the total rental units. Similarly, 1% of owner-occupied units are 1-bedroom or smaller. Since 32.4% of housing units in the City are occupied by single person households according to 2018 ACS data, the current housing stock does not accurately reflect the household composition.

Additionally, since the City of Palm Beach Gardens does not have a Public Housing Authority within its jurisdiction, residents would benefit from improved access to deep-end, long term housing subsidy programs aimed at improving housing affordability for persons of extremely low, very low, and moderate-income.

Discussion

The City of Palm Beach Gardens has limited funding resources from federal and state sources that can be used to address the need for affordable and available units. To support the needs of Palm Beach Gardens' most vulnerable residents, the City will continue to work in coordination with the public service systems in an effort to expand housing opportunities and supports for households that need rental assistance activities including support for persons with special needs, households experiencing homelessness, and economically disadvantaged households.

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

Introduction

The following section examines the cost of housing for both homeowners and renters in Palm Beach Gardens. A review is made of current home values and rents as well as the recent changes in home values and rents. Finally, a closer look is given to the affordability and availability of the existing housing stock for the residents of the jurisdiction.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2018	% Change
Median Home Value	364,500	345,000	(5%)
Median Contract Rent	1,111	1,472	32%

Table 28 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2014-2018 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	25	.3%
\$500-999	452	6.8%
\$1,000-1,499	3,089	46.3%
\$1,500-1,999	1,925	28.9%
\$2,000 or more	1,180	17.7%
Total	6,671	100%

Table 29 - Rent Paid

Data Source: 2014-2018 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	70	No Data
50% HAMFI	225	735
80% HAMFI	1,310	2,093
100% HAMFI	No Data	3,568
Total	1,605	6,396

Table 30 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1015	1208	1506	2043	2422
High HOME Rent	979	1050	1262	1450	1598
Low HOME Rent	768	823	988	1141	1273

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Despite a decrease of 5% in the median home value from \$364,500 in 2009 to \$345,000 in 2018, the median rent increased by 32% from \$1,111 in 2009 to \$1,472 in 2018, based on 2018 ACS data. More recent data, available from Zillow, show even higher housing costs: a median home value of \$392,965 and median rent of \$2,500.

Based on the data in Table 30, there are just over 8,000 households (1,605 renters and 6,396 owners earning up to 100% HAMFI) who have access to affordable housing units. The data also show that homeownership is more attainable for households earning 80% HAMFI and above, with 2,093 identified homeowners in the 80% HAMFI range and 3,568 homeowners in the 100% HAMFI range compared to 1,310 renter households within the 80% HAMFI range. Homeowners who earn over 100% HAMFI have the most access to affordable units because their higher earnings allow for a more expensive cost of living. There is no data available for the number of renters earning 100% HAMFI and above.

There is a shortage of affordable units for extremely low-income and low-income residents. There are only 70 rental units available and affordable to extremely low-income renters compared to 1,950 households in this income range. There is no data available for households within the 30% HAMFI range who are homeowners. There are 960 housing units affordable to households in the 50% HAMFI range compared to 2,020 households.

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

According to Zillow’s Home Value Index for Palm Beach Gardens, home values have increased 3.3% over the past year (between July 2019 and August 2020) and is projected to rise by 4.4% within the next year. The cost of renting has also increased year-over-year and is anticipated to continue rising.

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 real-time data available demonstrates that the HUD Fair Market Rents (FMRs) do not align with the median rent identified on Zillow’s Home Value Index. The FMR for a 2 -bedroom unit is \$1,506 compared to a median rent of \$2,500. For Palm Beach Gardens residents whose income is at or below the median, there is a need for more affordable and attainable housing options that can be supported by their household income. As an example, 30% of the median household income is \$2,011, with a median rent of \$2,500 these households would be cost burdened when renting in the City.

Discussion

Palm Beach Gardens continues to be a highly desirable community for both rental and homeownership. The City’s residents would benefit from opportunities to increase affordability, especially for persons between 0%-80% HAMFI. Supporting homeownership opportunities while preventing cost burden can be an essential tool for promoting housing stability and economic mobility. The median contract rent currently exceeds affordable limits for households earning the median income in the Miami-Fort Lauderdale-West Palm Beach Metro Area. Although the City does dedicate CDBG resources to activities aimed at keeping people housed in decent housing, the community would benefit from additional affordable and available rental units and homes for purchase.

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

Introduction

This section of the Plan describes the condition of the housing stock and the need for housing rehabilitation activities. Various factors determine the need for housing rehabilitation for owners and renters. The quality of the housing stock is contingent on housing condition, age of the structure, and the risk of lead-based paint in the unit. Older homes typically require renovation to address energy efficiency, maintenance or upgrades, and address health and safety, structural, or cosmetic issues.

Almost 80% of the City's housing stock was built after 1980. These units include 12,665 owner-occupied units and 5,255 rental units. Less than 1% of the housing units in Palm Beach Gardens were constructed before 1950. Table 32 outlines "selected" housing conditions as defined by the U.S. Census Bureau. These conditions are generally considered identifiers of substandard housing, although the last two conditions on the list relate to the household, not the housing unit. The Census defines a "selected" condition as:

- Lacking complete plumbing facilities
- Lacking complete kitchen facilities
- More than one person per room
- Housing costs greater than 30% of household income

There are double the number of rental units with one condition than there are owner-occupied units as demonstrated by the data in Table 32 which show that 24% of owner-occupied units and 48% of renter occupied units have one selected condition. Of the occupied housing units, the 2018 ACS 5-Year estimates report that 0.3% lack complete plumbing facilities and 0.8% lack complete kitchen facilities.

Definitions

The City strives to increase the availability of permanent housing in standard condition. To ensure housing projects and activities meet this goal, it is important to define the terms standard condition and substandard condition but suitable for rehabilitation. The City's definitions are as follows:

Standard Condition

- The unit meets all state and local codes.
- The unit does not have any life, health, and safety conditions.

Substandard but Suitable for Rehabilitation

- The unit does not meet standard conditions and it is both structurally and financially feasible to rehabilitate.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	4,212	24%	3,262	48%
With two selected Conditions	84	1%	101	1%
With three selected Conditions	0	0%	36	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,947	75%	3,448	50%
Total	17,243	99.5%	6,847	100%

Table 32 - Condition of Units

Data Source: 2014-2018 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,785	29%	2,370	36%
1980-1999	7,880	48%	2,885	43%
1950-1979	3,570	22%	1,345	20%
Before 1950	59	0%	53	1%
Total	16,294	99%	6,653	100%

Table 33 – Year Unit Built

Data Source: 2011-2015 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	3,498	20.3%	1,613	23.6%
Housing Units build before 1980 with children present	1,639	10%	930	14%

Table 34 – Risk of Lead-Based Paint

Data Source: 2014-2018 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	No Data	No Data	No Data
Abandoned Vacant Units	No Data	No Data	No Data
REO Properties	No Data	No Data	No Data
Abandoned REO Properties	No Data	No Data	No Data

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

According to the data in Table 32, there are 7,474 housing units (4,212 owner-occupied and 3,262 renter-occupied) with one selected condition and 185 housing units (84 owner-occupied and 101 owner-occupied) with two selected conditions. The particular selected housing condition cannot be derived from the data however based on the Housing Needs Summary tables in the Needs Assessment, it is highly likely that the selected condition identified by most households is housing cost burden. Being cost burdened does not directly substantiate the need for rehabilitation. However, cost burdened households may not prioritize housing maintenance or repairs due to a lack of financial resources and may need assistance with rehabbing their homes. A small segment of the population also reported substandard housing conditions as a housing problem – 160 LMI renters and 60 LMI owners according to data in Table 7.

Based on the ACS data, the rehabilitation of owner-occupied units is more of a need than rental rehabilitation. However, there are many other housing rehabilitation needs that are not reflected by the Census data which is limited to units that lack complete kitchen or plumbing facilities. There is no local data available on units suitable for rehabilitation and the City determines the feasibility of rehabilitating a housing unit on a case-by-case basis based on the resources available and local housing rehabilitation policies.

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

Lead-based paint can cause health issues and, although it was banned in 1978, this toxic substance is still present in older homes. When the paint is in poor condition, it may require specialized remediation to prevent health hazards to the occupants. Table 34 provides data on the risk of lead-based paint. Of the total 3,498 owner-occupied units built before 1980, 1,639 (47%) have children present. Also, 1,613 renter-occupied units were built before 1980 of which 930 (58%) have children present.

In the most recent CDC state surveillance data reporting childhood blood lead levels, the total population of children less than 72 months of age was 85,289 in Palm Beach County. Of those, 16,450 children under 72 months of age were tested (19.3%). Of those tested, 259 (1.5%) children had elevated blood lead levels. The Florida Department of Health in Palm Beach County conducts lead investigations in homes of children through the Childhood Lead Poisoning Prevention Program. Services offered in this program include environmental assessment (dust wipes and soil sampling), interpretation of results, lead consultation, comprehensive environmental investigation, recommendations for lead mitigation and abatement, and public education through community outreach.

Discussion

To support eligible LMI homeowners to remain housed and prevent uninhabitable units and blighted neighborhoods, the City assists residents with housing rehabilitation activities. The limited CDBG funding directly granted to the City is used to support existing homeowners and their repair needs when there is a threat to the health, safety, and welfare of the resident.

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

Introduction

Public and assisted housing is an essential source of affordable housing for low- and moderate-income individuals and families. Public housing agencies play an important role in the provision of affordable housing by operating housing developments and/or managing housing choice vouchers that tenants can use to rent privately owned units. While the City of Palm Beach Gardens does not have a public housing agency or any public housing developments within its boundaries, housing choice vouchers holders are able to use the subsidy provided by a public housing agency to rent units in the City.

The information provided in the table below is the number of public housing units owned and managed by the Palm Beach County Housing Authority (PBCHA). PBCHA was created in 1969 under Chapter 421 of the Florida Statutes to provide affordable housing to low-income families through rental assistance programs throughout Palm Beach County. PBCHA’s mission is to preserve and build quality, affordable housing in choice, inclusive neighborhoods, using housing as a platform for social and economic advancement.

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	2,813	0	428	2,840	420	2,257	0	0	163
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Palm Beach County Housing Authority (2020)
Source:

Describe the supply of public housing developments:

PBCHA owns and manages 428 units of low-income public housing, 148 workforce housing units and 6 homes under the Neighborhood Stabilization Program. PBCHA also administers 2,840 Housing Choice Vouchers (HCV) and related Section 8 subsidies including 163

Mainstream/Disability vouchers and 264 Housing Opportunity Opportunities for Persons with AIDS (HOPWA) vouchers. The PBCHA has allocated 420 Housing Choice Vouchers for use as project-based vouchers (PBV) for supportive housing projects. In total, the PBCHA provides affordable homes to more than 8,000 people with the greatest need households at or below 30% of AMI.

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:

There are no public housing units in the City of Palm Beach Gardens.

Public Housing Condition

Public Housing Development	Average Inspection Score
N/A	N/A

Table 37 - Public Housing Condition

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

N/A

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

N/A

Discussion:

As of August 2020, there were almost 6,000 applicants on the PBCHA tenant-based HCV waiting list. A family that is issued a tenant-based voucher can choose a suitable housing unit in the jurisdiction, when the property owners agrees to rent under the program. Approximately 60 households utilize housing choice vouchers in Palm Beach Gardens. The PBCHA plans to maintain or increase HCV lease-up rates by maintaining or increasing payment standards that will enable families to rent throughout Palm Beach County.

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

Introduction

The FL-605 West Palm Beach/Palm Beach County CoC reported 2,181 total year-round beds on their 2019 Housing Inventory Count (HIC). This total includes emergency shelter, transitional housing, and permanent housing. There are 282 family units with 1,107 family beds, 1,062 adult-only beds, 12 child-only beds. The three sub-categories include 546 beds dedicated to chronically homeless persons, 496 beds for veterans, and 240 beds specific to youth experiencing homelessness.

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)	269	0	32	341	
Households with Only Adults	134	4	95	668	
Chronically Homeless Households	0	0	0	546	
Veterans	23	0	20	431	
Unaccompanied Youth	53	0	38	60	

Table 38 - Facilities and Housing Targeted to Homeless Households

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

Each person served by the CoC's housing crisis response system requires individualized levels of engagement, tailored services, and varying degrees of support and financial assistance to achieve housing stability. During episodes of literal homelessness, providers within the crisis response system utilize a housing focused model, with an emphasis on ending the homeless episode and housing stabilization to prevent future episodes of homelessness. CoC housing providers link consumers to community-integrated supports such as healthcare, childcare, education, and employment resources which ensure continuity of care once the homeless-specific supports phase out upon stabilizing housing.

The City supports the activities of the Palm Beach County CoC's housing crisis response system. People experiencing homelessness in the City of Palm Beach Gardens can access the Palm Beach County Resource Guide in addition to an interactive on-line resource directory at https://secure.co.palm-beach.fl.us/CSD_GIS/CSD_Agencies/CSD_Agencies_Landing.aspx which are provided by the Palm Beach County Community Services Division and the Homeless Coalition of Palm Beach County. Resources include (and extend beyond) shelter, housing, food/clothing, drop-in centers, outreach, behavioral health and medical services, job training and placement, family services, legal services, services for veterans, financial assistance, help obtaining vital documents and benefits, senior services, meal delivery, legal services and transportation. The Coordinated Entry Point for people experiencing homelessness in the City of Palm Beach Gardens is the Senator Phillip D. Lewis Center in Palm Beach County. The Helpline can be reached by dialing 2-1-1 in Palm Beach County which offers information, assessment, and referral to persons experiencing a housing crisis.

The Managing Entity, Southeast Florida Behavioral Health Network (SEFBHN), is responsible for various initiatives that serve persons who overlap into the CoC. The Projects for Assistance to Transition from Homelessness (PATH) program, which is administered by The Lord's Place in Palm Beach County, provides outreach, screening, referral, and linkage to mainstream resources in the community. SEFBHN developed a network of Managing Entity-funded SOAR specialists, who assist persons experiencing homelessness or formerly homeless with applying for SSI/SSDI benefits through the SSA.

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 Palm Beach County Homeless and Housing Alliance is responsible for coordinating the homeless crisis response system throughout Palm Beach County, including the City of Palm Beach

Gardens. The FL-605 West Palm Beach/Palm Beach County CoC relies on funding from local, state, and federal resources to achieve the goals of preventing and ending homelessness in the region, passing the dollars through to direct service providers who operate programs in accordance with the CoC's guidance and all funder regulations. CoC coordinated entry system (CES) focuses on prioritizing the most vulnerable individuals, families and youth who are experiencing or are at risk of experiencing homelessness. CES ensures homeless individuals have quick and easy access to low or no barrier services and that their episodes of homelessness are as brief as possible. CES covers 100% of the targeted geographic area consisting of 39 incorporated municipalities and unincorporated areas.

The Senator Philip D. Lewis Center, which is the central point of access for individuals and families experiencing homelessness in Palm Beach County, provides temporary housing, assessment, referral, medical care, life skills, and job training and placement. During episodes of a housing crisis, the Lewis Center offers three Emergency Shelter programs, the Lewis Center Hotel/Motel which is comprised of 14 family units (51 family beds), Lewis Center Transition Beds totaling six adult-only beds and an addition four as overflow, and 60 adult-only beds in the Lewis Center Residential Beds program. While participating in the programs, shelter guests receive housing-focused services aiming to decrease the amount of time at Emergency Shelter and quickly transitioning into permanent housing. The Lewis Center also operates three Rapid Rehousing projects, totaling 138 beds, which incorporates housing navigation, supportive services/case management, and financial assistance to quickly transition households out of homelessness and back into housing with the goal of achieving permanent housing stability.

The Managing Entity's system of care funds services to persons who are indigent, underinsured, or uninsured. Permanent Supportive Housing (PSH) projects incorporate housing in conjunction with services to assist the most vulnerable and long-term homeless persons to obtain and maintain their housing. The housing subsidy and supports are available to participants as long as they choose to participate and qualify annually. These services include funding direct service providers who are delivering case management, clinical supports, and recovery-oriented services to CoC-funded PSH participants. Services provided may include benefit acquisition (such as SSI/SSDI, SNAP), linkage to employment resources in the community such as CareerSource, Vocational Rehabilitation or the Clubhouse model, or coordination with community-based services aimed at individuals with a specific disabling condition live in their community and in a home of their choosing.

Mental Health America of Palm Beach County offers peer training and certification which leads individuals with lived experience to train and work in peer support roles, resulting in becoming a Certified Recovery Peer Specialist. Implementing a housing first philosophy when assisting these

consumers, the person first secures housing then is continually engaged with self-identified supports to help achieve stability and improve quality of life.

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

Introduction

Within the City of Palm Beach Gardens, persons with special needs have access to various services and facilities that offer accessibility and opportunities for community integration by accommodating the specific individualized needs of City residents. These facilities and services include home repair programs that can benefit elderly persons, persons with disabilities, and the eligible population at large, senior services, treatment facilities, case management and counseling services, and programs that lead to self-sufficiency.

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

The City supports the CDBG home repair program which provides elderly persons and other community members, with home improvements which are otherwise not affordable to persons who rely on a limited income. This program helps elderly households safely remain in their homes and age in place. City residents who require modifications to their homes due to a disability will also be eligible to receive home repair assistance through the City's program. According to the Shimberg Center's Assisted Housing Inventory there are no properties that target elderly residents or persons with special needs in the City. However, the City operates the Lakeside Center which provides activities and events for seniors, to improve the mental health and wellness of the City's senior community.

The Managing Entity responsible for coordinating and managing a system of care for underinsured, uninsured, and indigent individuals with a mental health disorder, substance use disorder, or who have a co-occurring diagnosis is the Southeast Florida Behavioral Health Network (SEFBHN). SEFBHN's system of care includes funding for case management, crisis stabilization, mobile crisis support/walk-in crisis support, adult mental health inpatient services, medical services, Residential Treatment Facility (room/board with supervision), inpatient detoxification, supportive housing/living services, Medication Assisted Treatment (MAT), short-term residential treatment, and Addiction Receiving Facility (ARF). Shifting to a recovery-based model of care, SEFBHN has a dedicated Housing Coordinator to help identify and link consumers to a safe and affordable supportive housing options in the community of their choosing. SEFBHN provides high utilizers of behavioral healthcare crisis services with care coordination, financial assistance for housing-related costs, assistance applying for SSI/SSDI using the SOAR model, and works among community partners to seek affordable housing solutions for consumers in the behavioral health system of care.

The Palm Beach County Department of Community Services contracts with local HIV/AIDS service providers throughout the County to address the health care and service needs of people living with HIV disease and their families. Offered services include medical, case management, housing, dental care, food services, transportation, legal services, and substance abuse and mental health counseling. The Palm Beach County HIV Care Council identified the following service categories to receive federal funding: Early Intervention Services, Nonmedical Case Management-Supportive, and Psychosocial Support Services. One hundred percent of Psychosocial Support Services funds are directed to peer navigation services targeted at engagement of Haitian individuals living with HIV. The HOPWA program is administered through the City of West Palm Beach, in partnership with the Palm Beach County Housing Authority.

The Palm Beach County Housing Authority Family Self Sufficiency (FSS) program provides an opportunity to improve participants economic self-sufficiency, connect with support services and resources in the community, participate in case management services, and achieve employment and/or educational goals. FSS participants receive the support with the objective of achieving training for a job, going to college, getting off public assistance, starting a business, and buying a home. Although the City does not have a Public Housing Authority within its jurisdiction, the surrounding county housing agency can provide housing subsidies and resources to LMI households within the City of Palm Beach Gardens.

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

The City of Palm Beach Gardens actively participates in meetings and coordination among various systems of care. Adhering to ADA/Olmstead, housing options that support community integration for persons existing institutional care settings is essential. Ensuring that individuals can return home to independent living promotes a person's recovery and encourages housing stability. The Care Coordination initiative, implemented throughout SEFBHN's system of care, connects individuals with the services and supports that they need to transition successfully from higher levels of care to effective recovery oriented, community-based care. This care coordination initiative targets high utilizers of systems, providing services and supports that includes primary health care, peer support services, housing, and education. This is a time limited service intended to fully connect the consumer to continuous supports that address on-going needs. The continuity of care upon discharge from an in-patient setting can include services funded by SEFBHN in addition to Medicaid, Medicare, or private insurance.

The Florida Statutes set forth state discharge guidelines and notes that the intent of the Legislature is to ensure that persons leaving care and custody are not discharged into homelessness. The Florida State Department of Corrections requires contracted halfway houses in order to secure full employment for clients and to discharge clients into transitional or

permanent housing residence. The Federal Bureau of Prisons Halfway House Program has the same requirements. According to the Florida Association of Recovery Residences (FARR), there are four certified recovery residences in the City of Palm Beach Gardens: Desert Rose, Transitions Gateway, Start Living Life, and Sunset House Inc. These FARR-certified recovery residences offer varying levels of care, starting at the service provider level with credentialed staff to peer-run sites with no paid positions within the residence.

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)

Based on community feedback in the PY 2020-2024 Consolidated Plan survey, community members expressed that special needs housing for persons with HIV/AIDS, elderly, and persons with disabilities are a low to medium priority, with recognition of the need for affordable housing available to all residents. However, there are existing facilities and programs to meet the supportive housing needs of these specific populations. When in need of resources, Palm Beach Gardens residents can contact 2-1-1 Palm Beach via telephone or their website as a first stop for suicide prevention, crisis intervention, information, assessment, and referral to community services.

During PY 2020-2021, using CDBG dollars, the City will continue to offer resources to seniors, strengthening their wellness and independence. Additionally, the City's dedication to accessibility allows persons with disabilities to remain living at home and independently. By providing the right services at the right time, the City of Palm Beach Gardens residents with special needs can continue living independently, and in their own home. Evidence based strategies supported by federal, state, and local partners are essential to assisting persons with special needs who benefit from targeted supportive services which are aimed at housing stabilization and retention, recovery, and activities that support independence.

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))

Not applicable. The City of Palm Beach Gardens is not part of a Consortium. Please see information in previous question.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing. The City of Palm Beach Gardens recognizes that there can be institutional, regulatory, or policy barriers to development and promotion of access to affordable housing. Some of these barriers are at the discretion of City policymakers. Generally, the following barriers may impact the development of affordable housing:

- Development approvals process: the development approval process can be time- and resource-intensive, particularly for developers of affordable housing.
- Density restrictions: depending on the maximum allowable density in any given zoning category, higher density housing developments may be prohibited. Higher density housing is typically able to absorb more income-restricted housing and still maintain profitability for the developer, in addition to naturally enhancing the availability of housing overall.
- Parking and setback requirements: depending on the restrictions of parking and setbacks in the local land use code and comprehensive plan, these requirements may prohibit development of affordable housing.
- Affordable housing accessible to transit: low-income households are more likely to depend on public transportation as a means of mobility. A lack of affordable housing near public transportation networks places an inherent restriction on a family's ability to reasonably access housing.
- Not in My Back Yard (NIMBY) Syndrome: the social and financial stigma of affordable housing can lead to significant resistance from community members.

The City developed an Analysis of Impediments to Fair Housing Choice (AI) to identify impediments or barriers to affordable housing and fair housing choice and plans to take actions toward the resolution of the barriers. In 2020 the City updated its AI and identified the following impediments that may have an impact on the availability of affordable housing:

1. Single-family zoned communities making up a majority of Palm Beach Gardens do not allow a mix of housing types or accessory dwelling units.
2. Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.

3. HOAs are a prominent feature of the built environment in Palm Beach Gardens, suggesting a need for consistent and professional training on fair housing rights, best practices, and regulations for HOAs.
4. The most common reason for home loan denial is poor credit history.

During 2019, The City engaged a consultant, Strategic Planning Group, to develop a Workforce Housing Program. The Workforce Housing Report will be adopted in November 2020 and identifies a variety of solutions for increasing the housing options available to middle-income workers in the City. The workforce housing solutions include establishing a housing trust fund, permitted accessory dwelling units in certain communities with larger lots, and a number of incentives to encourage developers to include workforce housing in projects such as, density bonuses, waiving or crediting of impact fees, and waiving building permit application review fees.

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

Introduction

The City of Palm Beach Gardens recognizes the vital importance of promoting economic development through workforce development, non-housing community revitalization strategies, and private sector incentives. The City's pro-active business climate embraces innovation and provides an atmosphere for business prosperity. The City also recognizes the critical importance of approaching economic development from a regional perspective and through a collaborative approach. While the City's Economic Development program provides incentives for business growth, the City also partners with organizations including the Business Development Board of Palm Beach County, Palm Beach North Chamber of Commerce, and the PGA Corridor Association to enhance the economic vitality of the area.

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	89	72	0	0	0
Arts, Entertainment, Accommodations	3,113	5,752	16	20	4
Construction	1,025	786	5	3	-3
Education and Health Care Services	3,332	5,445	17	19	2
Finance, Insurance, and Real Estate	1,479	2,685	8	9	2
Information	439	670	2	2	0
Manufacturing	760	1,053	4	4	0
Other Services	1,039	1,282	5	4	-1
Professional, Scientific, Management Services	2,376	3,149	12	11	-1
Public Administration	0	0	0	0	0
Retail Trade	2,795	5,549	14	19	5
Transportation and Warehousing	427	48	2	0	-2
Wholesale Trade	872	646	4	2	-2
Total	17,746	27,137	--	--	--

Table 39 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	25,725
Civilian Employed Population 16 years and over	24,390
Unemployment Rate	5.13
Unemployment Rate for Ages 16-24	14.33
Unemployment Rate for Ages 25-65	3.92

Table 40 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	8,490
Farming, fisheries and forestry occupations	724
Service	2,105
Sales and office	6,735
Construction, extraction, maintenance and repair	960
Production, transportation and material moving	590

Table 41 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	17,585	79%
30-59 Minutes	3,650	16%
60 or More Minutes	960	4%
Total	22,195	100%

Table 42 - Travel Time

Data Source: 2011-2015 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	805	65	400

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	3,060	295	1,265
Some college or Associate's degree	5,930	305	1,580
Bachelor's degree or higher	9,940	360	2,210

Table 43 - Educational Attainment by Employment Status

Data Source: 2011-2015 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	100	260	233	305
9th to 12th grade, no diploma	205	105	289	290	485
High school graduate, GED, or alternative	965	1,240	795	2,580	3,115
Some college, no degree	785	805	910	3,235	3,335
Associate's degree	159	655	575	1,630	700
Bachelor's degree	415	2,085	1,920	3,810	3,410
Graduate or professional degree	53	815	1,405	2,485	3,155

Table 44 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,451
High school graduate (includes equivalency)	30,763
Some college or Associate's degree	37,299
Bachelor's degree	52,060
Graduate or professional degree	73,510

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The Business Activity table demonstrates the strength of the City's business climate: diversity in industries, and availability of jobs for those with the requisite skills. The industry with the greatest share of workers, and the number of jobs available, is Education and Health Care Service (3,332

workers, and 5,445 jobs). This industry is strong in the City of Palm Beach Gardens because it is home to several medical centers including Gardens Surgery Center of Palm Beach County, Palm Beach Gardens Medical Center, and Chatsworth PGA National to name a few. Also, in addition to its charter, public, and private schools Palm Beach Gardens is home to or near several educational institutions and universities including Palm Beach State College Eisey Campus, Nova Southeastern University, and Florida Atlantic University's Jupiter campus.

The second largest industry is the Arts, Entertainment and Accommodations industry (3,113 workers, and 5,752 jobs). Tourism can be a significant catalyst for economic activity. Some of the notable attractions in Palm Beach Gardens and the surrounding areas include the Honda Classic, Rapids Water Park, and PGA National Resort and Spa. Palm Beach Gardens is also close to several top-rated Florida beaches.

The third major industry is Retail Trade (2,795 workers, and 5,752 jobs). Palm Beach Gardens is home to the Gardens Mall, a two-story mall owned by the Southfield Michigan based The Forbes Company. The mall has over 160 stores, specialty shops, and eateries. The anchor stores are Sears, Saks Fifth Avenue, Macy's, Bloomingdale's, and Nordstrom. High end designer stores such as Lily Pulitzer, Ralph Lauren, and Gucci have also placed their shops in the mall.

Describe the workforce and infrastructure needs of the business community:

A highly educated workforce, temperate climate, and easy access to transportation routes offer competitive advantages for businesses operating within Palm Beach Gardens. Approximately 40% of the civilian population in the labor force has a bachelor's degree or higher. This provides a great opportunity for high-skilled economic sectors to maintain their home-base in Palm Beach Gardens. Several companies are headquartered in the City including: DePuy Synthes/Anspach Effort, Inc., Aurora Diagnostics, Zimmer Biomet, Chromalloy Center of Excellence, Cross Match Technologies, Inc., Dycom Industries, HearUSA, Inc., LRP Publications, and TBC Corporation. Hosting large companies creates a considerable demand for a higher-educated, and skills-ready workforce and supports higher wages.

Palm Beach Gardens also has the infrastructure, such as reliable transportation, to support businesses and workers. As a participant of a Comprehensive Economic Development Strategy (CEDS) through the Treasure Coast Regional Planning Council, it has been identified that most of the region is well served by potable water, sanitary sewer, stormwater drainage, telecommunication, and electricity which is important to economic development.

In addition, multiple modes of transportation provide mobility within the region and to the rest of the state, nation, and world. A network of local, county, and state roadways as well as Interstate 95 and the Florida Turnpike crisscross the region, providing automobile and truck

mobility as well as an expanding accommodation for pedestrians and bicyclists. In parts of the region, especially Palm Beach County, there is a growing recognition that congestion can no longer be entirely addressed through the addition of roadway lanes and that other modes need investment and expansion.

Transportation routes include:

- CSX Rail has a distribution point on northwest boundary of the Gardens.
- FEC Rail.
- I-95 and Florida's Turnpike are within 1 mile of each other in Palm Beach Gardens.
- Port of Palm Beach is located in a neighboring municipality – Riviera Beach, Florida.
- Palm Beach International Airport makes for an easy connection to the world for passengers and air-freight.
- U.S. Customs has operations in Palm Beach County, enabling faster turn-around time for products entering the United States.

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 Consolidated 2017 Strengths, Weaknesses, Opportunities, Threats (SWOT) analysis through the CEDS identified the following threats which may or may not change the economic environment of the region: infrastructure and resources stretched by growth, negative public perception of economic development, lack of civic knowledge and effective engagement in decision making, environmental impact from Lake Okeechobee discharges, the potential for unbridled and unbalanced growth, worker skills becoming obsolete due to changing technology, and manmade and natural disasters.

The threat of manmade and natural disasters could have a significant economic impact on the City of Palm Beach Gardens. Disaster preparedness for business support and infrastructure needs will be imperative to minimizing impact.

Beyond resiliency initiatives there are no major changes in place or in the near future that will have an economic impact. The City consists of primarily residential areas. Future changes include smaller scale development of new residential neighborhoods.

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

According to the data in Table 40, the total population of the civilian workforce is 24,725 persons, of which 24,390 are 16 years or older and employed. The unemployment rate in the City is 5%. Among the City's employed labor force over the age of 16, 65% of residents have some type of college education or degree. Among the workforce, 41% have a Bachelor's degree or higher. 13%, or 3,060 of the City's workforce has only a high school degree or equivalent. Median earnings for individuals with Bachelor's degree is \$52,060, individuals with a graduate degree or professional degree have median earnings of \$73,510.

The level of educational attainment corresponds well with the needs of local businesses. However, it is noted that there is a discrepancy between the number of jobs and the number of workers for each industry as shown in Table 39. Some of the major employers in the City and surrounding areas require a highly educated and trained workforce and include: G4S Headquarters, Palm Beach Gardens Medical Center, Palm Beach County School Board, PGA National Resort & Spa, TBC Corporation, Biomet 3i, Belcan Engineering Group, and Anspach Companies. Companies headquartered within Palm Beach Gardens include: Anspach Effort, Inc., Aurora Diagnostics, Biomet 3i, Chromalloy Center of Excellence, Commtouch, Cross Match Technologies, Inc., Dycom Industries, LRP Publications, PGA of America, TBC Corporation, and Ocean Ridge Biosciences.

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.

Palm Beach State College is a four-year college that provides many different programs at Associates, Bachelor, and technical degree levels as well as numerous apprenticeship and other training programs. CareerSource Palm Beach County provides several programs that help provide needed job skills training and placement services including a successful internship program, on the job training incentive programs and Workforce Initiative Act (WIA) funded education and training funding.

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.

The City of Palm Beach Gardens participates in a Comprehensive Economic Development Strategy under the Treasure Coast Regional Planning Council. The City of Palm Beach Gardens

offers Ad Valorem Tax and Targeted Expedited Permitting incentives and works with partners including the Business Development Board of Palm Beach County, the Northern Palm Beach County Chamber of Commerce, and Enterprise Florida on other initiatives. The City does not plan on undertaking any economic development activities with CDBG funding during the next five years.

MA-50 Needs and Market Analysis Discussion

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

HUD identifies four specific data points that constitute “housing problems”: cost burden, overcrowding, lack of complete plumbing facilities, and lack of complete kitchen facilities.

For an area to have a concentration of housing problems, it must include two or more housing problems that are substantially higher than the citywide average. For this analysis, HUD’s definition of “disproportionate” will be used to identify areas substantially higher: 10 percentage points higher than the jurisdiction as a whole.

The Needs Assessment revealed that the most common housing problem in the City is housing cost burden, specifically severe cost burden. According to data in Table 32, there are only 221 households with multiple housing problems (185 households have two selected conditions and 36 households have three selected conditions) in the City.

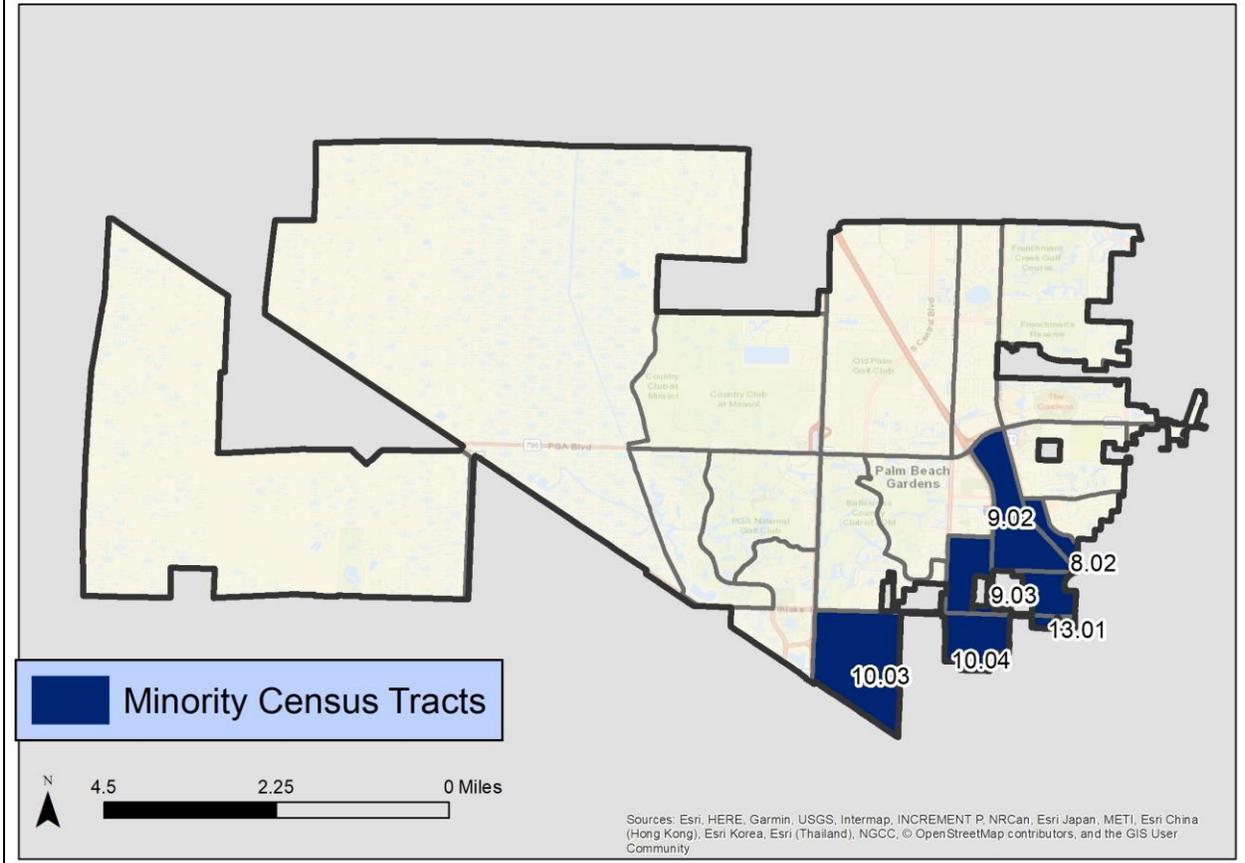
Based on a review of 2018 ACS data, there are no areas in the City with a concentration of multiple housing problems.

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

For the purposes of this analysis an area of “minority concentration” will be any census tract (CT) where a racial or ethnic minority group makes up 10 percent or more of the population than the city as a whole. According to the 2014-2018 American Community Survey 5-Year estimates the racial and ethnic breakdown of the City’s population is approximately 80% White only. Therefore, census tracts with a minority percentage of 30% or more are considered areas of minority concentration.

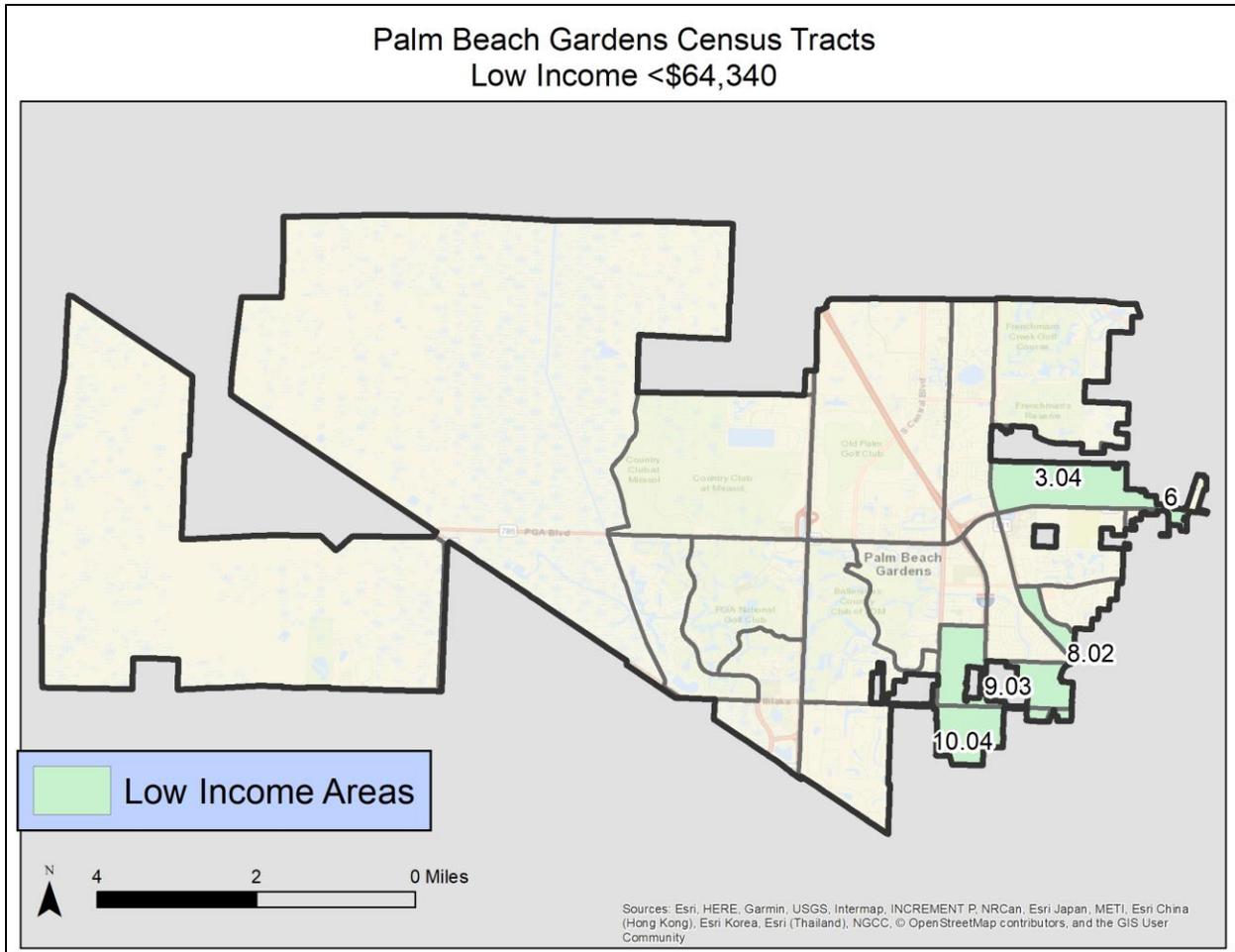
There are five census tracts in the City that meet this definition: Tract 9.02 (35.3%), Tract 9.03 (41.4%), Tract 10.03 (44.0%), Tract 10.04 (45.7%), and Tract 13.01 (86.9%). Census tract 9.02 includes Plat 1 and Plat 5. Census tract 9.03 includes the neighborhoods of Sun Terrace at Lake Catherine and Bedford at Lake Catherine. Census tract 10.03 is partially within the City limits and is bordered by the Florida Turnpike to the west, Northlake Blvd. to the north, and Bee Line Highway to the south, and Military Trail to the east. Census tract 10.04 includes Mary Circle, Sunset Drive, Gardens Oaks, and Sandtree.

Palm Beach Gardens Census Tracts Minority Areas (>30% Minorities)



An area of “low-income concentration” is any census tract where the median household income for the tract is 80% or less than the median household income for the City. According to the 2014-2018 American Community Survey (ACS) 5-Year Estimates, the median household income in the City is \$80,426. A census tract is considered to have a low-income concentration if the median household income is \$64,340 or less.

There are six census tracts in the City that are considered areas of low-income concentration based on this definition: Tract 3.04 (\$64,183); Tract 5.05 (\$62,931); Tract 6 (\$41,583); Tract 9.03 (\$60,294); Tract 10.04 (\$37,031), and Tract 13.01 (\$41,276).



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

The cost of housing in the areas of low-income and minority concentration are lower than the jurisdiction as a whole. According to 2018 ACS data, the median home value in the City was \$345,000. Median home value in the areas of concentration range from \$95,600 to \$295,200, or 15-70% less than the City’s median home value. Similarly, median contract rent is less in the areas of concentration except for census tract 3.04. Median contract rent for the City was \$1,472 and ranges from \$985 to \$1,477 in the areas of concentration. Regarding cost burden, described here as households spending 35% or more of income on housing costs, owners with a mortgage in the areas of concentration have cost burden rates between 18.1% and 45.1% compared to 23.3% for the City; owners without a mortgage in the areas of concentration have cost burden rates between 2.6% and 30.3% compared to 16.4% for the City; and renters in the areas of concentration have cost burden rates between 14.8% and 56.2% compared to 41.8% for the City. The table at the end of this section provides details on the data for each census tract referenced in this narrative.

Are there any community assets in these areas/neighborhoods?

Community assets in these areas include FAU North Campus and Palm Beach Gardens Elementary (Tract 9.02), Howell L. Watkins Middle School (Tract 9.03), the Promenade Shopping Plaza (Tract 8.02), and the Gardens Mall (Tract 3.04).

Are there other strategic opportunities in any of these areas?

There may be opportunities to expend CDBG funds in census tracts that are primarily residential and where there are block groups that are low- and moderate-income. Additionally, any low- and moderate-income households that reside in these areas may qualify for CDBG-activities that require income qualification such as housing rehabilitation.

	Median Home Value	Median Contract Rent	% cost burden >35%		
			Owners with a mortgage	Owners without a mortgage	Renters
Citywide	\$345,000	\$1,472	23.3%	16.4%	41.8%
CT 3.04	\$173,600	\$1,477	18.1%	21.4%	33.6%
CT 5.05	\$247,300	\$1,392	45.1%	17.4%	53.3%
CT 6.00	\$274,500	\$985	28.9%	6.7%	56.2%
CT 9.02	\$288,000	\$1,299	21.4%	4.9%	61.9%
CT 9.03	\$206,300	\$1,110	31.0%	4.0%	47.3%
CT 10.03	\$295,200	\$1,358	38.3%	6.1%	14.8%
CT 10.04	\$95,600	\$1,109	44.7%	30.3%	53.2%
CT 13.01	\$152,800	\$1,021	29.8%	2.6%	49.3%

Data Source: 2014-2018 ACS

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.

According to Broadbandnow.com, there are two major broadband network types in Palm Beach Gardens, coaxial cable (97.71% availability) and DSL (95.68% coverage). Coaxial cable Internet is usually provided through TV providers via pre-existing coaxial television cables mounted on utility poles. DSL Internet is sent over phone wires. XFINITY from Comcast provides a third option for coverage in 98 percent of the Palm Beach Gardens area. Wireless choices like satellite and mobile are also available in the area.

The Brookings Institution is a nonprofit public policy organization based in Washington, DC with a mission to conduct in-depth research that leads to new ideas for solving problems facing society at the local, national, and global level. In 2017, Brookings published a report on signs of digital distress and provided a tool to map broadband availability and subscription at the neighborhood level. Studies have shown that neighborhoods having access to broadband services can increase the economic prosperity of the community and its residents, notably low-income neighborhoods.

When mapping the Miami–Fort Lauderdale–West Palm Beach Metropolitan Area, it shows moderate subscription rates among Palm Beach Garden neighborhoods. This means that 40-80% of residents in that neighborhood are connected to broadband. Though 59% of the nation experience better connectivity in moderate subscription neighborhoods, it still falls short of 100% connectivity (Adie Tomer, Elizabeth Kneebone, and Ranjitha Shivaram, “Signs of Digital Distress.” Brookings, 12 Sept. 2017, www.brookings.edu).

The website Governing.com published Metro Area Broadband by Income Group data in their 2017 article “Where the Digital Divide Is the Worst”. The article states “Despite the continued proliferation of the internet and new digital devices, many low-income communities still lack internet access.

Slightly less than half of all households with incomes under \$20,000 reported having internet access in the Census Bureau’s most recent American Community Survey. By comparison, about 93 percent of wealthier households with annual incomes exceeding \$75,000 were connected.

A more recent Pew Research Center survey depicts similar disparities. It found only 53 percent of adults with incomes under \$30,000 had home broadband access, compared with 80 percent of those with incomes between \$30,000 and \$100,000” (Michael Maciag, “Where the Digital Divide Is the Worst.” Governing, 7 Sept. 2017, www.governing.com).

Data published by Governing.com shows that for the Miami–Fort Lauderdale–West Palm Beach Metropolitan Area households with an income less than \$20,000, 49.3% are connected to broadband services. This still leaves a portion of the City’s low-income population unconnected. Highspeed internet, or broadband, is instrumental to residents as it relates to providing economic opportunity, job creation, education, and civic engagement.

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

There are 16 internet providers in Palm Beach Gardens with seven of those offering residential service. Palm Beach Gardens is the 85th most connected city in Florida ahead of Wellington, North Palm Beach, Lake Worth, and Palm Beach, but behind West Palm Beach.

Palm Beach Gardens residents generally have two or more Internet Service Providers (ISPs) available to them. Availability varies by neighborhood, but the vast majority of Palm Beach Gardens addresses can access both cable and DSL service from at least two providers.

Internet providers with the greatest coverage in Palm Beach Gardens include:

- Viasat Internet: 100% coverage
- HughesNet: 100% coverage
- XFINITY from Comcast: 98.3% coverage
- AT&T Internet: 94.2% coverage

The rapid growth of internet and online services will increase the need for providers to offer fiber optic options. Fiber optics technology is propelling the market growth to a large extent. The fiber optics technology is widely used in the telecommunication industries, which offers noise rejection, higher data rate capabilities, electrical isolation, and other services that are driving its popularity. This could make a significant difference in the availability of competitive options.

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

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

As climate change effects impact human and natural environments, it has become increasingly important for Palm Beach County, including the City of Palm Beach Gardens, to adapt to climate change, mitigate climate change impacts, develop sustainably, and thereby reduce resident, business, and natural resource vulnerability.

Palm Beach County's historical natural disaster activity is greater than the US average with 24 natural disasters reported that could be attributed to climate change (City-Data.com). Of the 24 natural disasters reported, 15 were presidentially declared major disasters and 8 emergencies have been declared. The causes of these natural disasters vary but include: 15 hurricanes, 4 tropical storms, 3 fires, and 1 flood.

The climate is changing, manifesting in significant impacts for the Southeast Florida region, including increasing average temperatures, more intense storm events, and rising sea levels. Sea level rise, caused by the thermal expansion of warming ocean water and melting land ice as the earth warms, is one of the most evident impacts in the region given Southeast Florida's low-lying elevation. In 2019, the Southeast Florida Regional Climate Change Compact published a report titled "Unified Sea Level Rise Projection Southeast Florida". The report provides data that supports a rising sea level that is projected to be 10 to 17 inches by 2040 and 21 to 54 inches by 2070. The report also states that sea level rise is projected to be 40 to 136 inches by 2120. High sea levels could impact coastal and low-lying properties in Palm Beach Gardens as storm surge encroaches further inland. Saltwater intrusion could affect the City's drinking water, and rising temperatures could impact crop production while also leading to more frequent heat-related illnesses.

Rising sea levels pose the following threats to the City of Palm Beach Gardens:

- Increase in recurrent tidal flooding;
- Groundwater rise and reduced drainage capacity;
- Increased storm surge and waves; and
- Natural resource degradation.

The prevalence of hurricanes across the state also poses a threat to the City and surrounding areas. South Florida is subject to more hurricanes than any other area of equal size in the United States (Drew and Schomer 1984).

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

Extremely low and low-income cost burdened households are typically one emergency away from a total crisis. A natural disaster such as a hurricane or flooding would immediately put the City's low-and moderate-income households at risk of losing their homes and potentially becoming homeless. Climatic effects from storms and hurricanes also impact efficient delivery of essential services for residents and hardest hit populations, typically extremely low and low - income households. Low- and moderate-income households are more likely to live inland and away from the coast and are less susceptible to storm surge and sea level rise.

Strategic Plan

SP-05 Overview

Strategic Plan Outline

The Strategic Plan is the framework for how the City will invest CDBG funding during program years 2020 through 2024 based on the data and information analyzed in the Needs Assessment and the Market Analysis. The Strategic Plan outlines goals and measurable outcomes for addressing priority needs during the Consolidated Plan period and is divided into the following sections:

Geographic Priorities – The City has not designated any areas or neighborhoods as a target area or revitalization area. Instead of allocating CDBG resources geographically, the City will allocate funds on a citywide basis based on current needs, the availability of funds, and capacity. Projects may be carried in areas that qualify as low- and moderate-income based on data provided by HUD annually.

Priority Needs – CDBG funds are allocated based on the priorities established from the data in Needs Assessment and Market Analysis, data gathered through the 2020 Consolidated Plan survey, consultation with local agencies, and local reports. The City identified and prioritized three needs as “high” priorities: Affordable Housing, Public Infrastructure, and Program Administration. The City also identified one “low” priority: Public Services. The priority level does not indicate a relative priority among needs – no need is more important than the other – however due to funding limitations, the City will use CDBG funds on “high” priority projects and activities and coordinate with Palm Beach County, City departments, and community stakeholders to address “low” priorities.

Influence of Market Conditions – In making funding decisions, the City will also consider housing market conditions. Housing market considerations include the limited availability of affordable housing, high incidence of housing cost burden, and housing costs that are significantly higher than fair markets rents. Limited CDBG resources also influence the housing assistance that the City will provide.

Anticipated Resources – This section of Plan identifies the resources the City anticipates will be available to address the priority needs. During the five-year period covered by this Plan, the estimated CDBG allocation is \$1,188,230 based on the funding level for the first year of the Plan.

Institutional Delivery Structure – The City’s institutional delivery structure is comprised of the organizations or departments that will be involved in carrying out the program objectives. The Planning and Zoning Department is responsible for overall program administration and planning

and the City's Engineering Department will be involved in the planning, implementation, and monitoring of public improvement activities. Other City departments will provide support to the Planning and Zoning staff, as needed, to ensure compliance with program requirements.

Goals – The City has set two main goals for the term of the Consolidated Plan to address the priority needs. The two goals are improving access to public infrastructure and rehabilitation of existing owner-occupied units. This section of the Plan also identifies the anticipated accomplishments for each goal.

Public Housing Accessibility and Involvement - There are no public housing developments in the City therefore the City does not have a strategy to address the needs of public housing residents. However, the City supports the goal of the Palm Beach County Housing Authority to provide affordable rental housing to low-income persons. The City will continue to strive to be a community that does not discriminate based on source of income or limit housing opportunities for housing choice voucher holders who desire to reside in Palm Beach Gardens.

Barriers to Affordable Housing - It is a goal of the City to increase the supply of affordable housing for low-and moderate-income persons. To accomplish this goal the City must overcome any barriers to the creation of affordable housing. During the term of the Strategic Plan, the City will take actions to address barriers to affordable housing identified in the Analysis of Impediments to Fair Housing Choice (AI).

Homelessness Strategy – The Point-in-Time count identified few unsheltered persons experiencing homelessness in the City. However, the data in the Needs Assessment show that there are extremely low-income individuals and families that may be susceptible to homelessness after just one crisis. To address current homeless needs and curb future homelessness, the City will coordinate with the Homeless and Housing Alliance of Palm Beach County and other groups/organizations that have a mission of ending homelessness in Palm Beach County.

Lead-Based Paint Hazards - The City is obligated to take steps to address lead hazards when assisting housing built before 1978. For any housing rehabilitation projects that involve CDBG-funding, the City will follow its policies and procedures to ensure that the occupants of the housing, especially young children, are not exposed to lead-based paint, and that families are aware of the risk.

Anti-poverty Strategy – The goal of the City's Single-Family Housing Rehabilitation Assistance Program is to increase the availability, affordability, and accessibility of decent housing for low-and moderate-income households. Persons living below the poverty level are often forced to make hard decisions about how to meet their basic needs with limited financial resources. By addressing poor housing conditions through the Housing Rehabilitation program, the burden of

making costly home repairs is addressed and cost savings from lower utilities and other household expenses may also be realized.

Monitoring – The final section of the Strategic Plan describes how the City will monitor its projects to ensure compliance with CDBG program requirements, Consolidated Planning requirements, and crosscutting federal requirements applicable to the CDBG Program such as environmental review, procurement, and uniform administrative requirements.

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

Geographic Area

1	Area Name:	Citywide
	Area Type:	Citywide
	Other Target Area Description:	N/A
	Identify the neighborhood boundaries for this target area.	City of Palm Beach Gardens boundaries.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	N/A
	Identify the needs in this target area.	The jurisdiction needs an increased supply of affordable housing, public facility improvements, and increased public services.
	What are the opportunities for improvement in this target area?	Opportunities for improvement include increased access to affordable housing and the provision of services to provide decent housing and a suitable living environment for all Palm Beach Gardens residents. There is also an opportunity for local/regional organizations that have similar goals as the City to partner on projects and other efforts.
	Are there barriers to improvement in this target area?	The jurisdiction faces a significant shortage in funding that can be used for the types of revitalization and housing projects needed to address the priority needs. There are also significant barriers related to Not in My Backyard (NIMBY) concerns across the City, particularly in low poverty, high opportunity neighborhoods.

Table 46 - Geographic Priority Areas

General Allocation Priorities

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

The City adheres to all program-specific eligibility requirements when allocating funds. No specific geographic area within the City to has been designated as a target area. Funds are allocated on a priority need basis and will be expended occur in various locations throughout

Palm Beach Gardens as eligible and feasible projects are identified. Additionally, the City is responsive to barriers to fair housing choice within the jurisdiction. Fair housing barriers represent a significant burden on members of the protected classes, as they prevent families from accessing high quality housing, particularly in low poverty areas with access to jobs, health care, and educational opportunities. For this reason, the City prioritizes communities and residents facing affordable housing and fair housing barriers within City limits.

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

Priority Needs

1	Priority Need Name	Public Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Frail Elderly Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Improve access to public infrastructure
	Description	Improve the living environment of individuals and families in eligible areas through the construction or installation of infrastructure improvements.
	Basis for Relative Priority	A “high” priority was assigned for this priority need based on data gathered from local studies/surveys on neighborhood conditions as well as from the 2020 Consolidated Plan survey. Over 70% of respondents to the Consolidated Plan survey ranked the need for public infrastructure as a “high need”.
2	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Frail Elderly
	Geographic Areas Affected	Citywide
	Associated Goals	Rehabilitation of existing units
	Description	Provision of decent housing for income-qualified households to improve the housing stock and increase the affordability of housing units.

	Basis for Relative Priority	A “high” priority was assigned for this priority need based on data from the Needs Assessment and Market Analysis which showed that close to 40% of households in Palm Beach Gardens have a housing problem . The data also indicated that there is an insufficient supply of affordable housing to meet the needs of residents. Additionally, a significant number of respondents to the 2020 Consolidated Plan survey identified affordable housing as the top priority need.
3	Priority Need Name	CDBG Program Administration
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Frail Elderly Non-housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Program Administration
	Description	Overall program management related to carrying out the CDBG program.
	Basis for Relative Priority	CDBG regulations permit 20% of the annual CDBG allocation to be used for staff costs related to general program administration to ensure that program objectives are met.
4	Priority Need Name	Public Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Frail Elderly

	Geographic Areas Affected	Citywide
	Associated Goals	Improve access to public services
	Description	Provision of public service activities to improve availability of services and accessibility to a suitable living environment.
	Basis for Relative Priority	A “low” priority was assigned for this priority need because these needs are expected to be addressed by community organization throughout the County with funding from other sources.

Table 47 – Priority Needs Summary

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)	<ul style="list-style-type: none"> • Tenant Based Rental Assistance is not an eligible use of CDBG funds.
TBRA for Non-Homeless Special Needs	<ul style="list-style-type: none"> • Tenant Based Rental Assistance is not an eligible use of CDBG funds.
New Unit Production	<ul style="list-style-type: none"> • Limited availability of decent, standard, and affordable units for LMI households and for persons with special needs. • Housing costs that are significantly higher than Fair Market Rents • Extensive waiting list for housing choice vouchers
Rehabilitation	<ul style="list-style-type: none"> • High incidence of cost burden and severe cost burden among LMI households. • Cost for rehabilitation compared to the cost to construct new units.
Acquisition, including preservation	<ul style="list-style-type: none"> • Home values that are unaffordable to LMI households. • The cost and availability of land to be used for the development of affordable housing. • Tight lending requirements that limit homeownership opportunities for LMI households.

Table 48 – Influence of Market Conditions

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

Introduction

During the five years covered by this Plan, the City of Palm Beach Gardens expects to receive \$1,188,230 in CDBG funding. This assumes an annual allocation of \$237,610 – the City’s allocation for PY 2020-2021. The CDBG funds will be used to address the priority needs identified in this Strategic Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$237,610	0	0	\$237,610	\$950,440	The CDBG Entitlement program provides annual grants to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

Table 49 - 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

The CDBG funds may leverage additional resources for projects that have a budget shortfall. The City has identified public infrastructure as a priority need and will utilize CDBG funds for infrastructure projects in eligible areas. The anticipated project cost for infrastructure projects is expected to exceed the City's annual CDBG allocation and the City may seek other funding to fill any gaps or a pre-award waiver. There is no match requirement for the CDBG program.

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

The City does not have any publicly owned land or property that is available to address the needs identified in this Plan.

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 Beach Gardens Planning & Zoning Department	Government	Planning	Jurisdiction
Palm Beach Gardens Engineering Department	Departments and Agencies	Neighborhood Improvements	Jurisdiction

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The Planning and Zoning Department is responsible for the Planning and Administration of the CDBG program. City staff will coordinate and manage all activities to realize the prioritized goals of the Strategic Plan and Annual Action Plan.

Strengths

City staff and partners will implement the Consolidated Plan and subsequent one-year Annual Action Plans. The focus will be on carrying out the strategies identified in the Plan, based on established priorities. The City is also responsible for coordinating the efforts of all the entities involved in the institutional structure.

Gaps

The City does not have a public housing authority and there are a limited number of social service agencies located within the jurisdiction. However, where possible, it will coordinate programs with the surrounding municipalities, local housing authorities, and organizations/agencies that serve the community.

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	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	

Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	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			
Other			

Table 51 - 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)

Persons experiencing homelessness within the City of Palm Beach Gardens receive services through the City’s partners. The CoC, Palm Beach County Homeless and Housing Alliance, and the network of direct service providing agencies within the jurisdiction provide outreach, education, referral, housing, and supportive services. Ensuring consistency in assessment, the CoC and its providers utilize the Service Prioritization Decision Assistance Tool (SPDAT), an evidence-informed approach to assess an individual’s acuity. The SPDAT is a streamlined assessment tool which is a component of the Coordinated Entry System, assisting to determine prioritization of the right intervention, with the right services, at the right time. Used by the Homeless Outreach Team, SPDAT is employed to conduct initial screenings and to make appropriate referrals. Consistent with identifying and evaluating all persons experiencing homelessness within the CoC’s jurisdiction-Palm Beach County, the Lewis Center (homeless resource center) uses the SPDAT as the initial screening tool.

The Lewis Center is the primary Coordinated Entry Point within Palm Beach County, linking consumers to all homeless specific supportive and housing services throughout the CoC’s geographic area. The City of Palm Beach Gardens relies on the CoC, its network providers, and stakeholders to support housing options for persons experiencing homelessness within the City. Housing interventions for this population include emergency shelter, transitional housing, rapid-

re-housing, permanent supportive housing and permanent housing. Referrals are also made for various supportive services including, but not limited to, behavioral health services (substance abuse/mental health services), education, childcare, employment training, life skills, health care services, and transportation resources. Housing programs and supportive services that target persons experiencing homelessness within the jurisdiction are funded through federal, state, and local sources. Persons experiencing chronic homelessness are prioritized, and subrecipients funded through the CoC must adhere to these written prioritization standards.

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 most significant strength of the service delivery system for persons experiencing homelessness and persons with special needs is coordination among a large number of service providers located throughout the Palm Beach County, which are accessible to the City of Palm Beach Gardens residents. Guaranteeing that City residents who are experiencing homelessness or residents with special needs are housed within the most appropriate intervention and provided with the individualized supportive services, the Palm Beach County Community Services Department works with its many community partners to collaborate on the development and implementation of these projects. Organizations who hold membership with the Homeless and Housing Alliance, in addition to the network of direct service providers, often provide vital services to persons with disabilities and special needs who overlap into the housing crisis response system. The diversity of participating stakeholders ensures a strong collective impact when preventing and ending homelessness in the City of Palm Beach Gardens.

CoC-led coordination through subcommittee meetings and stakeholder engagement ensures a targeted approach to serving these populations, in addition to multi-disciplinary planning which aids in preventing duplication of services. Monthly meetings that incorporate community partners and sometimes consumers help identify and address issues related to homelessness and access to housing/services for persons with special needs living within the jurisdiction.

The gaps identified within the service delivery system for persons with needs and persons experiencing homelessness includes lack of funding, which is needed to increase permanent housing units or beds and to provide supportive services to persons with service needs. Often the housing crisis response system is the final stop for people who have fallen through the gaps of other systems and the CoC is tasked with resolving the housing and crisis needs with limited funding resources. The lack of available funding continues to push providers to do resolve severe housing and service needs with inadequate resources.

Although housing is recognized as the solution to ending homelessness, the jurisdiction identifies the lack of shelters and supportive services that are provided within the western communities of the County a gap in the service delivery system. Persons experiencing homelessness can access the only Homeless Resource Center in the CoC's geographic area, which is located in West Palm Beach. Despite the CoC's Coordinated Entry Point at the Lewis Center, residents of the City may not be able to access various housing options and/or supportive services due to the location of such services.

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

The City of Palm Beach Gardens relies on Palm Beach County to support continued funding organizations that target persons experiencing homelessness and persons with special needs through affordable housing, public services, economic development services, homeless services, and other community development activities. The City will support the County's efforts to seek other federal, state, local, and/or private funding for programs and activities that assist extremely low-, very low, and low to moderate-income persons residing with the City of Palm Beach Gardens.

In a collaborative effort between The Palm Beach County Homeless Coalition and the Palm Beach County Homeless and Housing Alliance (HHA), the service delivery system for the County's homeless and special needs programs will be mapped to identify and close gaps in the current institutional structure and service delivery system. The HHA CoC will analyze the data collected during the mapping process and use this information, along with data collected from the Homeless Management Intake System (HMIS), to identify priority needs within the housing crisis response system.

To best support housing and service needs for persons experiencing homelessness and persons with special needs in the City of Palm Beach Gardens, Palm Beach County employs a partnership strategy. This approach brings together a diverse group of stakeholders and providers who have specific skills intended to bridge the gaps by addressing the identified needs. The role of the County's Department of Housing & Economic Sustainability (DHES) is to initiate strategic planning for the development of viable urban communities, which impacts the City of Palm Beach Gardens. DHES will evaluate proposals and recommend appropriate HUD funding to various partners for activity implementation and monitoring funded activities for regulatory compliance. DHES also is responsible for certifying consistency with the County's Consolidated Plan for any housing-related activity that receives HUD funding. Historically, this process and subsequent partnerships has proven successful and is anticipated that it will continue to result in the provision of housing and non-housing activities in the development of viable urban communities within Palm Beach County.

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	Improve access to public infrastructure	2020	2024	Non-Housing Community Development	Citywide	Public Infrastructure	CDBG: \$950,440	Public facility or infrastructure activities other than low/moderate-income housing benefit: 1,175 Persons Assisted
2	CDBG Program Administration	2020	2024	Planning and Administration	Citywide	Program Administration	CDBG: \$237,610	Other: N/A
3	Rehabilitation of existing units	2021	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$0	Homeowner Housing Rehabilitated: 10 homes

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Improve access to public infrastructure
	Goal Description	Funds will be used to improve the living environment of individuals and families in eligible areas through the construction or installation of infrastructure improvements.
2	Goal Name	CDBG Program Administration
	Goal Description	Funds will be used for staff costs related to overall program management, monitoring, and evaluation.
3	Goal Name	Affordable Housing
	Goal Description	Funds will be used to rehabilitate owner-occupied single family homes.

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)

It is estimated that the City will rehabilitate seven (7) existing housing units that are occupied by low- and moderate-income households during PY 2020-2021 using prior years resources.

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)

There are no public housing developments in the City of Palm Beach Gardens therefore this section of the plan is not applicable.

Activities to Increase Resident Involvements

To encourage public housing residents to become more involved in management and homeownership, the PBCHA will:

- Continue to have a resident board member on the PBCHA Board of Commissioners who is directly assisted under PBCHA’s public housing or HCV program. The resident board member will take part in decisions related to the administration, operation, and management of PBCHA’s programs.
- Adopt rent policies and assess any programs that support and encourage work and/or homeownership.
- Continue to partner with local & regional workforce partners to increase the number of employed/under-employed persons in assisted housing.
- Provide programs, tools and resources for job skills development, job training and employment of public housing residents through resident programs and services, Section 3 program, scholarships, and other available resources.
- Increase resident and voucher holder participation in the Family Self-Sufficiency (FSS) program.

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

N/A

Plan to remove the ‘troubled’ designation

N/A

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

Barriers to Affordable Housing

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing. The City of Palm Beach Gardens recognizes that there can be institutional, regulatory, or policy barriers to development and promotion of access to affordable housing. Some of these barriers are at the discretion of City policymakers. Generally, the following barriers may impact the development of affordable housing:

- Development approvals process: the development approval process can be time- and resource-intensive, particularly for developers of affordable housing.
- Density restrictions: depending on the maximum allowable density in any given zoning category, higher density housing developments may be prohibited. Higher density housing is typically able to absorb more income-restricted housing and still maintain profitability for the developer, in addition to naturally enhancing the availability of housing overall.
- Parking and setback requirements: depending on the restrictions of parking and setbacks in the local land use code and comprehensive plan, these requirements may prohibit development of affordable housing.
- Affordable housing accessible to transit: low-income households are more likely to depend on public transportation as a means of mobility. A lack of affordable housing near public transportation networks places an inherent restriction on a family's ability to reasonably access housing.
- Not in My Back Yard (NIMBY) Syndrome: the social and financial stigma of affordable housing can lead to significant resistance from community members.

The City developed an Analysis of Impediments to Fair Housing Choice (AI) to identify impediments or barriers to affordable housing and fair housing choice and plans to take actions toward the resolution of the barriers. In 2020 the City updated its AI and identified the following impediments that may have an impact on the availability of affordable housing:

1. Single-family zoned communities making up a majority of Palm Beach Gardens do not allow a mix of housing types or accessory dwelling units.
2. Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.

3. HOAs are a prominent feature of the built environment in Palm Beach Gardens, suggesting a need for consistent and professional training on fair housing rights, best practices, and regulations for HOAs.
4. The most common reason for home loan denial is poor credit history.

During 2019, The City engaged a consultant, Strategic Planning Group, to develop a Workforce Housing Program. The Workforce Housing Report will be adopted in November 2020 and identifies a variety of solutions for increasing the housing options available to middle-income workers in the City. The workforce housing solutions include establishing a housing trust fund, permitting accessory dwelling units in certain communities with larger lots, and a number of incentives to encourage developers to include workforce housing in projects such as, density bonuses, waiving or crediting of impact fees, and waiving building permit application review fees.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City identified the following actions to increase the supply of affordable housing and to address the impediments in the AI related to zoning policies and practices:

1. Increase densities in downtown areas and create more missing middle and mixed-use zones.
2. Allow ADUs by right in most residential zones.
3. Establish a process for considering the suitability of current and/or future city-owned properties for affordable housing development and prioritize affordable housing development for suitable properties.
4. Work with affordable housing developers, particularly nonprofit developers, to construct subsidized housing.
5. Conduct a study of existing land use and zoning regulations to determine avenues for permitting, by right, a mix of housing types and sizes.

In addition, the Housing Element of the City's Comprehensive Land Use Plan addresses the City's desire to combat barriers to affordable housing. The Housing Element includes the following goals and objectives in support of affordable housing:

GOAL 3.1.: THE PROVISION OF SUSTAINABLE, SAFE AND SANITARY HOUSING WHICH MEETS THE NEEDS OF ALL EXISTING AND FUTURE PALM BEACH GARDENS RESIDENTS.

- Objective 3.1.1.: Strive to fulfill the City housing needs while promoting sustainable and energy efficient standards.

- Objective 3.1.2.: Assist the private sector to provide housing of the various types, sizes, and costs to meet the housing needs of all existing and anticipated populations of the City. Toward this objective, the City shall maintain land development regulations, consistent with Section 163.3202 F.S., to facilitate public and private sector cooperation in the housing delivery system.
- Objective 3.1.3.: Continue to identify and assess any substandard units located within the City limits.
- Objective 3.1.4.: Encourage housing and supportive services for the elderly and special needs residents.
- Objective 3.1.5.: Provide for adequate sites for group homes, manufactured homes and mobile homes to ensure that the needs of persons requiring such housing are met.
- Objective 3.1.6.: Through continued monitoring and enforcement of building and housing codes, the City shall strive to conserve and extend the useful life of the existing housing stock and stabilization of older neighborhoods.

GOAL 3.2.: THE PROVISION OF AFFORDABLE AND WORKFORCE HOUSING BY PRESERVING EXISTING STABLE NEIGHBORHOODS, REHABILITATING NEIGHBORHOODS THAT HAVE DECLINED, AND DEVELOPING NEW RESIDENTIAL DEVELOPMENTS.

- Objective 3.2.1.: Promote programs and other means to ensure that affordable and workforce housing are provided to residents of all income ranges to sustain a balanced community and economic growth.
- Objective 3.2.2.: Continue to designate adequate sites with appropriate land use and density on the Future Land Use Map, the City shall ensure that adequate supply of land exists in the City for the private sector to provide for the housing needs of the extremely low, very low, low and moderate income families, essential service personnel, the elderly, and special need residents.

Each objective of the Housing Element also includes several policies in support of affordable housing initiatives. The complete Housing Element and its polices can be found at <https://www.pbgfl.com/DocumentCenter/View/93/Housing-PDF>.

The City will also combat barriers to affordable housing through its Housing Rehabilitation Program. This Program will help address poverty (e.g. low-income homeowners) and remove possible life safety housing hazards including roof repair and accessibility for the disabled and special needs individuals.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Palm Beach Gardens supports the efforts of the FL-605 West Palm Beach/Palm Beach County CoC by coordinating with the Homeless and Housing Alliance of Palm Beach County. Understanding the importance of preventing and ending homelessness within the jurisdiction, the City will continue participating in CoC-led initiatives.

As part of the CoC's 10-year plan to end homelessness, "Leading the Way Home: Using Collective Impact to End Homelessness in Palm Beach County," the CoC is focused on increasing resources for outreach teams and housing specialists as a strategy to end chronic and veteran homelessness. In addition, the CoC incorporates increasing capacity and funding for clinical case management within the strategy as well. The steps to end veteran and chronic homelessness include:

1. Utilize Acuity Criteria to ensure most vulnerable are housed in Permanent Supportive Housing (i.e. longest time homeless, Frequent Users Systems Engagement (FUSE) model, Veteran, Domestic Violence (DV), highest barriers).
2. Coordinate Outreach to prevent duplication.
3. Utilize low barrier programs & Rapid Re-Housing (RRH) when Permanent Supportive Housing (PSH) not available.
4. Identify Section 8 Vouchers to move individuals from PSH that no longer require intensive supportive services.
5. Identify landlords to quickly provide housing.

To support the goal of ending homelessness among youth across Palm Beach County, the CoC's strategy is to effectively identify and engage youth who are at-risk or experiencing homelessness; connect youth with trauma-informed, culturally appropriate, and developmentally age-appropriate interventions; and establish core outcomes for youth such as housing stabilization, creating permanent connections, employment/educational opportunities, and focus on emotional and social well-being.

To support persons experiencing homelessness, the CoC's strategy also includes development of Homeless Resource Centers in the Southern and Western areas of the county and youth drop-in centers for young people experiencing homelessness, ages 16 to 24 years old.

Addressing the emergency and transitional housing needs of homeless persons

To ensure that Emergency Shelter beds are dedicated to persons experiencing a homeless episode who lack resources to resolve their housing crisis, the CoC has implemented diversion strategies to prevent these households from entering the housing crisis response system by helping them identify resources other than Emergency Shelter.

Addressing the needs of persons experiencing homelessness begins at the Coordinated Entry System (CES). Per HUD regulations, CoCs have adopted a streamlined Coordinated Entry process to identify, assess, refer, and house persons experiencing homelessness. When someone is experiencing a housing crisis in Palm Beach County, the City of Palm Beach Gardens included, the Senator Philip D. Lewis Center is the access point for screening and referral into the housing crisis response system. The CoC has also implemented prioritization of persons experiencing homelessness utilizing a standardized assessment tool. Additionally, street outreach and other dedicated outreach teams can operate as access points aiming at engaging unsheltered consumers who do not otherwise participate in services.

According to the 2019 Housing Inventory Count, there are a total of 415 Emergency Shelter beds and 127 Transitional Housing Beds within the FL-605 West Palm Beach/Palm Beach County CoC. Guided by HUD's pivot away from Transitional Housing, the CoC's strategy has incorporated reallocating Transitional Housing funding to Permanent Supportive Housing. Emergency Shelters are recognized as the temporary, short term option for families who lack resources, and but for the emergency or transitional resources, are unable to restabilize their housing situation independently. To quickly identify and rehouse people experiencing homelessness within the jurisdiction, the CoC's strategy includes implementation of Housing First practices and Rapid Rehousing models rather than extending temporary shelter solutions, which are not permanent. Therefore, the CoC's strategy is to reallocate Emergency Shelter funding to fund more permanent housing solutions.

The data show that there are not enough resources in the County to adequately address all the needs of people who need emergency and transitional services. This is demonstrated by the number of persons experiencing homelessness, notably persons who remain in unsheltered locations. The CoC's strategy is a multi-system collaboration to increase the number of housing units. This includes partnerships with the Palm Beach County Housing Authority, West Palm Beach Housing Authority, Goodwill Industries, and Adopt-A-Family. At the time that the CoC's 10-year plan was approved, the aforementioned partners were in process of developing 475 rental units and 12 units for homeownership.

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.

As housing is the solution to ending homelessness, the CoC has included increasing housing supply in Palm Beach County. This strategy includes: hiring a full time employee that will focus solely on partnership and funding opportunities; work with developers and Florida Housing Finance Corporation to establish set-aside partnerships as it relates to Coordinated Entry list; use sales tax revenue to purchase housing for targeted populations; allocation of local funding to prioritize supportive services; and work jointly with Department of Housing and Economic Development to produce micro-units and container housing. This multi-sector effort requires the participation of various partners across a wide spectrum of systems.

The CoC applied and was selected to participate in the 100 Day 100 Youth Housing Challenge, was selected to administer the Youth Homelessness Demonstration Program, and applied for funding specific to creating a youth drop in center and increasing community outreach targeting youth experiencing homelessness. The CoC's strategy incorporates housing stabilization, creating permanent connections, creating employment and educational opportunities, and focusing on the emotional and social well-being of youth experiencing homelessness. Youth will also be engaged using trauma-informed, culturally appropriate, and developmentally age-appropriate interventions.

To end family homelessness, the strategy is focused on prevention, capacity building, housing, and policy change. Incorporated as part of the strategies, emergency assistance to help families remain in their housing includes financial assistance for rent, utilities, and other expenses; diversion to assist families who have lost their housing quickly identify resources outside of the housing crisis response system and quickly resolve their housing crisis; emergency shelters will provide short-term emergency assistance for families who have no other resources; and supportive housing with extensive wrap around case management services which address barriers to maintain housing.

Permanent Supportive Housing (PSH) is intended to serve individuals with the most severe service needs and long-term homeless histories. This program can be a "lifetime" voucher subsidy paired with supportive services that help the housing participant address chronic health

issues, outpatient treatment/supportive services, and housing stability and retention. The idea is that the housing participant who is eligible for this program due to such high levels of acuity, will need housing assistance to afford their rental for the remainder of their life and supportive services based on their level of need to help them retain their housing. The Managing Entity, Southeast Florida Behavioral Health Network (SEFBHN) passes through funding for services such as case management, supportive housing, the SSI/SSDI, Outreach, Access, and Recovery (SOAR) model to assist consumers with applying for benefits through the Social Security Administration, and other behavioral health treatment options that assist with recovery and, in turn, housing stabilization.

Rapid Re-Housing (RRH) programs can serve anyone experiencing homelessness; however, the rental and supportive services are time limited so programs often target households who will have the ability to self-sustain their lease independently of the program. The CoC has pivoted, reallocating funds once dedicated to short-term emergency shelter to Rapid Rehousing services. While PSH participants may receive more clinical or medically related services, RRH focuses on housing stabilization services rather than focusing on long-term clinical or medical needs.

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.

Documented in the Shimberg Center's 2019 Rental Market Study, 76% of extremely low-income renters and 69% of low-income renters in Palm Beach County are cost burdened, paying 40% or more of their income toward housing expenses. Additionally, 32% of households whose income is between 60%-80% AMI within Palm Beach County are cost burdened. When people cannot afford their housing expenses, it creates a housing crisis, especially in the event of an unexpected emergency. These unforeseen circumstances can result in "falling over the cliff" into the housing crisis response system.

Communities that offer education and employment opportunities to assist residents achieve career advancement and low-income households to move out of poverty and into economic stability creates a strong economy and healthy community. This may include linkage to Vocational Rehabilitation, programs aimed at self-sufficiency, or supported employment activities that can offer competitive employment. The Workforce Innovation & Opportunity Act (WIOA) is a federally funded program available to residents in the City of Palm Beach Gardens through CareerSource Palm Beach County. This program can offer training scholarships to earn a credential or certification, leading to a career in one of Palm Beach County's in-demand industries

such as healthcare, hospitality, construction, information technology, and business management. Currently, the program is seeking participants in the following occupations:

- General & Operations Managers
- Dental Assistants
- Electricians
- Computer Systems Analysts
- Software Developers, Applications
- Web Developers
- Registered Nurses
- Licensed Practical Nurses
- Paralegals & Legal Assistants
- Diagnostic Medical Sonographers

The Family Self-Sufficiency (FSS) program is available to participants of Palm Beach County Housing Authority's Housing Choice Voucher program. Combining the housing subsidy with supportive services provides program participants with services aimed at economic self-sufficiency through the attainment of educational and employment goals. The program also incorporates a savings account that can be used to support homeownership once graduating from the program. The program incorporates guidance, vocational training, transportation, job search skills, education, homeownership, and physical and mental wellness.

While SEFBHN cannot pay for rent, the Managing Entity issues funding for housing-related services for persons experiencing homelessness, including support for individuals who are high utilizers of public systems. To prevent homelessness among person served in the behavioral health system of care, SEFBHN funds services that assist with housing-related needs include emergency services, inpatient and outpatient services, psychiatric stabilization, detoxification, case management, SOAR training and processing to obtain SSI/SSDI benefits, and care coordination. With their role in coordinating and managing an effective system of behavioral healthcare, SEFBHN network initiatives and services include homeless prevention efforts at the time of discharge from institutional care settings by encouraging discharge planning upon admission. These efforts incorporate care coordination with State Hospitals, residential treatment facilities, outpatient programs, and healthcare providers. The organizations funded through SEFBHN offer both in-patient and community-based services to support reintegration when discharging from institutionalized settings.

The Legal Aid Society of Palm Beach County assists low income households with preventing homelessness through legal representation. The City of Palm Beach Gardens households can

contact 2-1-1 Helpline of Palm Beach and Treasure Coast can provide information and referral to persons in need of services and housing supports. The Palm Beach County Community Services Division's Human and Veteran Services Department provides assisted living, case management, emergency services (rent, utility, food vouchers, bus passes, etc.), FPL Care to Share program, Indigent Cremation Program, and self-sufficiency services to Palm Beach County's vulnerable residents.

The Homeless and Housing Alliance, under the umbrella of the Palm Beach County Community Services Division, applies for and manages federal and state funding. The state's funded Challenge Grant, issued to the CoC, funds activities related to providing re-housing of homeless persons, homeless prevention assistance to those at imminent risk of losing housing, street outreach activities to youth living in places not meant for habitation, and case management services to shelter clients. Unique to Palm Beach County is the Homeless Coalition of Palm Beach County who is a "catalyst for community collaboration to prevent and end homelessness" and works to end homelessness in Palm Beach County. The Homeless Coalition collaborates to fund programs at the Lewis Center which is the central point of access for individuals and families seeking to end their homelessness, the Creating Housing Opportunities Program which provides first and last month's rent and security deposits for persons moving into independent permanent housing, Breaking Bread, Breaking Barriers meal program, the Donation Center, Warm Welcome Kits at the Lewis Center, Project Homeless Connect, and the SMART Landlord Campaign to recruit landlords who can offer affordable rental units to low income households exiting homelessness.

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

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

Lead is a toxic metal that was used for many years in paint and was banned for residential use in 1978. Exposure to lead can result in health concerns for both children and adults. Children under six years of age are most at risk because their developing nervous systems are especially vulnerable to lead's effects and because they are more likely to ingest lead due to their more frequent hand-to-mouth behavior.

The City requires mandatory lead-based paint inspection, both interior and exterior, of all qualified applicants to the City's CDBG rehabilitation program in accordance with the monetary thresholds established in the federal guidelines, and related abatement if necessary. If the City comes across a project where lead-based paint is identified as an issue, the City will address and take appropriate steps to reduce the hazard. Staff also distributes required lead-based paint educational materials to each applicant during the assistance application intake process.

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

For purposes of this Consolidated Plan, the number of housing units built before 1980 and occupied by households with children are the units that are considered to pose the greatest threat of lead poisoning. Palm Beach Gardens residents have a low risk of exposure to lead-based poisoning due to the age of the housing stock. Not only is there the small percentage of the houses that were built before 1980, the prevalent paints in Florida were turpentine-based mineral spirits that were colored with pigments made from zinc oxide and linseed oil rather than lead based paint and widely manufactured, for military and household uses. According to 2014-2018 CHAS data in Table 33, only 22% of occupied housing units were built prior to 1980. Of the total 3,498 owner-occupied units built before 1980, 1,639 (47%) have children present. The total number renter-occupied units built before 1980 totaled 1,613, of which 930 (58%) have children present.

The strategy outlined above, helps to reduce lead hazards in the City's affordable housing stock. Through its CDBG Housing Rehabilitation Program, the City conducts lead-based paint inspections. The inspector tests all CDBG funded housing rehabilitation projects in homes constructed before 1978. Thus far, two homes have required lead-based paint abatement. However, the city is prepared to deal with LBP abatement should it become necessary again.

The federal funding available to the City that can be used to address lead hazards is not sufficient to create enough lead-based paint free housing for families that may be at risk of exposure to lead-based paint. A key factor to reducing lead hazards and eliminating lead poisoning in children is public education to increase awareness of lead hazards and how to prevent lead poisoning in

the first place. The City increases public awareness of lead hazards by following the notification and disclosure requirements of 24 CFR Part 35. In all housing built pre-1978 that is to be acquired or rehabilitated with CDBG funding, the City provides the potential buyer or tenant with the HUD pamphlet “Protect Your Family from Lead in Your Home” and a disclosure with a lead warning statement.

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

The City’s approach to lead hazard evaluation and reduction is included in all the City’s policies and procedures governing the federally-assisted housing program that is subject to the Lead Safe Housing Rule or policies for specific projects such as the owner-occupied rehabilitation. The City has all applicants for housing rehabilitation acknowledge receipt of the Lead Based Paint pamphlet as part of the application process. The City also incorporates the requirements of 24 CFR Part 35 in written agreements with subrecipients, developers, and contractors, where applicable. The City of Palm Beach Gardens has written policies for its rehabilitation program and also follows HUD regulations for lead-based paint best practices. Written policies state “all income eligible homes built prior to 1978 shall be test for lead based paint. If paint is detected and remediation is required, the cost to remediate in accordance with Federal Regulations will be incorporated into the overall mortgage”. The homeowner is provided copies of the original test report and the clearance report, if applicable.

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

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

An anti-poverty strategy is designed to develop affordable housing, create jobs, and stimulate the economic environment for the benefit and enhancement of the entire city. An essential component of an anti-poverty strategy is the successful coordination of social systems, which acknowledges an individual-economic status (health, education, employment, job training, minority assistance, etc.).

According to the 2018 ACS, 6.4% of individuals in Palm Beach Gardens live below the federal poverty level. In addition to persons living below the poverty level there is another group of persons that are struggling to meet their basic needs, that is, the working poor. The United Way of Florida prepared a report, the ‘Study of Financial Hardship’ known as the ALICE Report. The acronym ALICE stands for Asset Limited Income Constrained Employed and includes households that earn more than the federal poverty level, but less than the cost of living for the area. The 2020 update to the ALICE report indicated that 34% of households in Palm Beach Gardens are living below the ALICE threshold (below the cost of living and poverty level). In addition, the Household Survival Budget in the report reflects the bare minimum cost to live and work in the modern economy and includes housing, child-care, food, transportation, health care, technology (a smartphone plan), and taxes. It does not include savings for emergencies or future goals like college or retirement. For 2020 in Palm Beach County, household costs were well above the Federal Poverty Level of \$12,140 for a single adult and \$25,100 for a family of four.

The City will continue to carry out goals and objectives established in this Strategic Plan to assist in reducing poverty. The overarching goal of the Plan, to benefit the greatest number of people to the greatest extent possible, within the funding allocation, resonates throughout the anti-poverty strategy. The City will implement projects and activities that have been identified as the most beneficial to its residents and to assisting families in need. The City’s goal is to do its part to reduce or assist in reducing the number of individuals and families below the poverty level through its affordable housing and public improvement programs.

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

The affordable housing goals and objectives identified in this Strategic Plan target all low- and moderate-income persons in order to create or sustain affordable housing. The City will address poverty levels by enhancing the condition of the City’s housing stock and neighborhoods.

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.

The standards and procedures that will be used to monitor the management and implementation of the City's Consolidated Plan are all applicable laws found in the Code of Federal Regulations, Title 24 which pertains to HUD programs. In addition, HUD's Community Planning and Development Office has developed a monitoring guide that it uses to monitor grantees. The City will also use this as a standard for monitoring the implementation of the program. Other applicable regulations and policies such as those from the Department of Labor and U.S. Office of Management and Budget, and Office of Fair Housing and Equal Opportunity, Department of Environmental Protection Agency will also be used as the standard for any monitoring tools and procedures developed for housing and community development programs.

Procurement

The City will follow the City's procurement procedures for the use of contractors needed to carry out programs. Any firms used to carry out services will have the appropriate licensing and insurances to complete the activities which they are charged with undertaking.

Technical Assistance

To ensure activities are carried out in compliance with Federal regulations, when appropriate, technical assistance will be provided to subrecipients and other partners.

Timeliness

The timely expenditure of CDBG funding on eligible activities is an important program requirement. Projects and activities will be monitored to ensure they begin and are implemented in a timely manner and funds will be tracked and drawdowns completed on a regular basis.

Plan Procedures

The Planning Department's staff shall monitor all CDBG projects to ensure that statutory and regulatory requirements are being met and that the information entered in HUD's Integrated Disbursement and Information System (IDIS) is correct and complete.

Reporting and Program Compliance

- At the end of each program year, City staff will develop a Consolidated Annual Performance and Evaluation Report (CAPER) detailing Annual Action Plan, goals, objective, and accomplishments.
- Staff will provide Federal Cash Transactions reports on a quarterly basis as required by HUD.
- The City of Palm Beach Gardens will require citizen participation in the planning and amendment process of the Consolidated Plan and Annual Action Plans as required by HUD, 24 CFR 91.40 or 45 and the City's adopted Citizen Participation Plan.
- Review request for payment or reimbursement to assure that proper documentation is provided and that expenditures are for eligible activities under applicable rules and regulations and authorized under the sub-recipient agreement.
- Assure compliance with other program requirements, such as labor standards and fair housing laws, through in-depth monitoring and program review.

Sub-Recipient Monitoring

The Planning Department is responsible for oversight of all designated sub-recipients of CDBG funds and will perform the following tasks:

- Distinguish between subrecipients, contractors, and other entities;
- Execute written agreements containing all required elements before providing funds to subrecipients;
- Review subrecipients periodically in order to determine that program requirements are being met; and
- Take effective corrective and remedial actions toward subrecipients who do not comply.

Annual Action Plan

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

Introduction

During the five years covered by this Consolidated Plan, the City of Palm Beach Gardens expects to receive \$1,188,230 in CDBG funding. This assumes an annual allocation of \$237,610 – the City’s allocation for PY 2020. The CDBG funds will be used to address the priority needs identified in this Strategic Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$237,610	0	0	\$237,610	\$950,440	The CDBG Entitlement program provides annual grants to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

Table 53 - 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

The CDBG funds may leverage additional resources for projects that have a budget shortfall. The City has identified public infrastructure as a priority need and will utilize CDBG funds for infrastructure projects in eligible areas. The anticipated project cost for infrastructure projects is expected to exceed the City's annual CDBG allocation and the City may seek other funding to fill any gaps. There is no match requirement for the CDBG program.

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

The City does not have any publicly owned land or property that is available to address the needs identified in this Plan.

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	Improve access to public infrastructure	2020	2021	Non-Housing Community Development	Citywide	Public Infrastructure	CDBG: \$190,088	Public facility or infrastructure activities other than low/moderate-income housing benefit: 1,175 Persons Assisted
2	CDBG Program Administration	2020	2021	Planning and Administration	Citywide	Program Administration	CDBG: \$47,522	Other: N/A

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Improve access to public infrastructure
	Goal Description	Funds will be used to improve the living environment of individuals and families in eligible areas through the construction or installation of infrastructure improvements.
2	Goal Name	CDBG Program Administration
	Goal Description	Funds will be used for staff costs related to overall program management, monitoring, and evaluation.

Projects

AP-35 Projects – 91.220(d)

Introduction

During PY 2020-2021, the City will fund two projects with its CDBG allocation. The first project, the Mary Circle/Dania Drive Water Improvement project, is a public infrastructure project to be carried out in a low- and moderate-income area of the City. The project includes water main extension and roadway improvements to increase the availability of municipal services to residential properties in the area. The project will meet the Low/Mod Area Benefit national objective and will support the City’s Strategic Plan goal of improving access to public infrastructure.

The second project allocates 20 percent of the City’s annual CDBG allocation for program administration costs related to program management, monitoring, and evaluation.

Projects

#	Project Name
1	Mary Circle/Dania Drive Water and Sewer Improvements
2	CDBG Program Administration

Table 55 – Project Information

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

The City’s funding priorities are the same as those outlined in the Strategic Plan. Funding is prioritized for projects that have a “High” need as supported by data in the Needs Assessment and Market Analysis, local reports/studies, surveys, and local knowledge of residents, City department, and other stakeholders. The City of Palm Beach Gardens adheres to all program-specific eligibility requirements when allocating funds.

AP-38 Project Summary

Project Summary Information

1	Project Name	Mary Circle/Dania Drive Water and Sewer Improvements
	Target Area	N/A
	Goals Supported	Improve access to public infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$190,088
	Description	The City will use CDBG funds to construct and improve public infrastructure including water main extension and roadway improvements. The project will benefit all the residents of the immediate service area
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Based on CDBG Low- and Moderate-Income data for FY 2020, 1,175 individuals reside in the census block group where the project will be implemented, including 620 (52.77%) individuals that are low- and moderate-income
	Location Description	The project is located in Census Tract 10.04, Block Group 2
	Planned Activities	Water improvements and costs of street repairs made necessary by the improvements
2	Project Name	CDBG Program Administration
	Target Area	Citywide
	Goals Supported	CDBG Program Administration
	Needs Addressed	Program Administration and Planning
	Funding	CDBG: \$47,522
	Description	The City will use CDBG funds for costs associated with the management and oversight of the CDBG Program by the City's Planning & Zoning Department

Target Date	9/30/2021
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	Citywide
Planned Activities	General program administration costs for staff engaged in program management, monitoring, and evaluation

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 Beach Gardens did not identify target areas in the Strategic Plan however the City has determined that CDBG funds will be directed to geographic areas in the City that qualify under the Low/Mod Area Benefit (LMA) National Objective. These include residential neighborhoods where a majority of the residents are low- and moderate-income persons. Palm Beach Gardens is an exception community for PY 2020-2021 and can carry out area benefit activities in an area containing at least 40.3% LMI residents.

For PY 2020-2021, CDBG funds will be allocated to the Mary Circle/Dania Drive Water Main Extension project. The activity is located in census tract 10.04, block group 2 which has a LMI population of 52.77%.

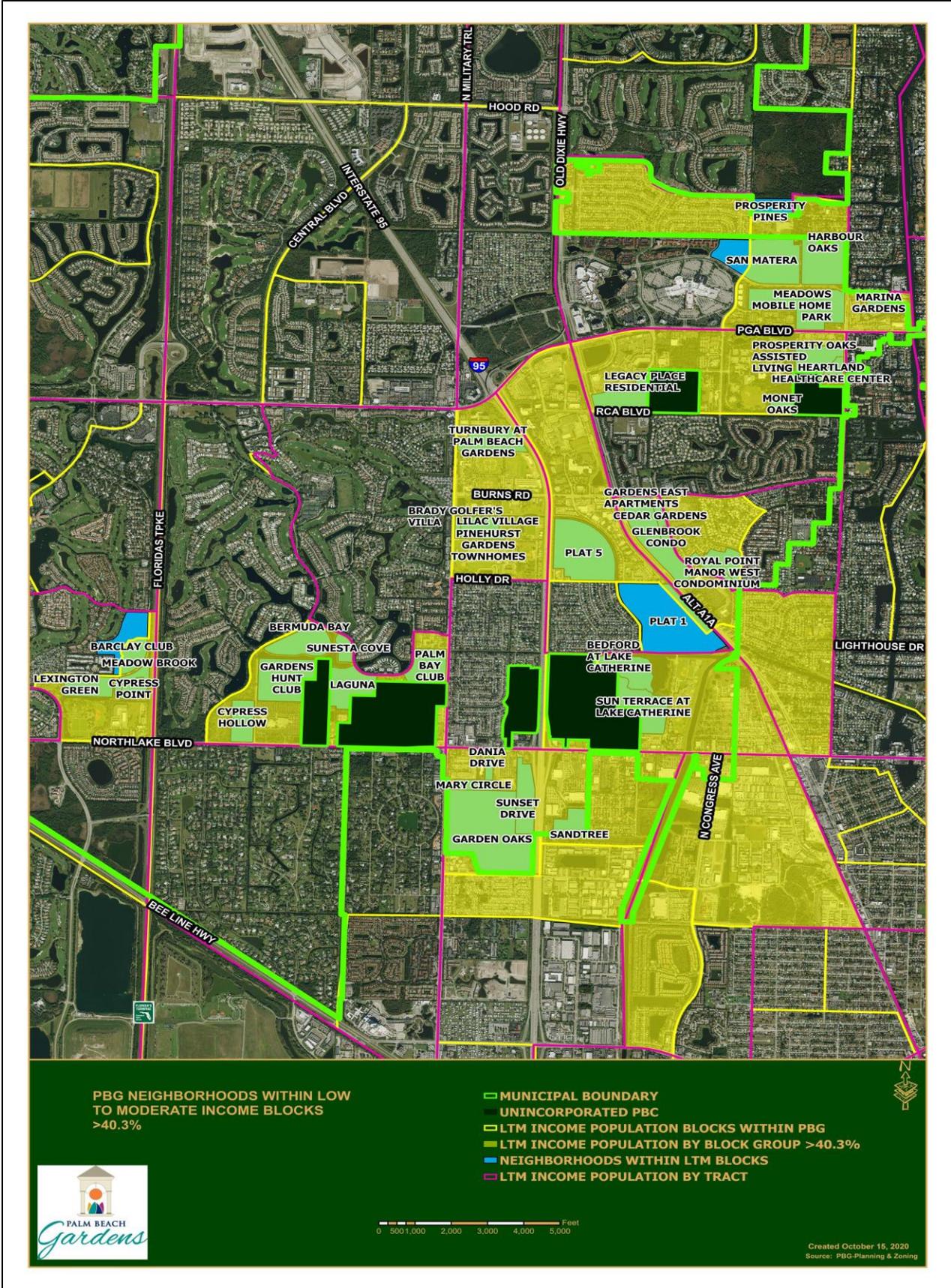
Geographic Distribution

Target Area	Percentage of Funds
N/A	N/A

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City adheres to all program-specific eligibility requirements when allocating funds. Funds are allocated on a priority need basis in neighborhoods that demonstrate compliance with HUD's low- to moderate-income criteria. The map on the following page identifies LMI census block groups in the City of Palm Beach Gardens.



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will utilize CDBG funds from prior years to continue the implementation of the Housing Rehabilitation program which serves income-eligible homeowners. The City does not plan on providing any affordable housing units with funding from PY 2020-2021.

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

Table 57 - 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 58 - One Year Goals for Affordable Housing by Support Type

Discussion

It is estimated that with the available CDBG resources from prior years approximately 7 existing housing units will be rehabilitated during PY 2020.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Palm Beach Gardens does not have any public housing development within its jurisdictional boundaries, and therefore relies on assistance provided by the Palm Beach County Housing Authority (PBCHA).

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

The City does not have any actions planned to address public housing during the next year.

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

The City supports PBCHA in their efforts to provide affordable housing including the goal of increasing homeownership. To encourage public housing residents to become more involved in management and homeownership, the PBCHA will:

- Continue to have a resident board member on the PBCHA Board of Commissioners who is directly assisted under PBCHA's public housing or HCV program. The resident board member will take part in decisions related to the administration, operation, and management of PBCHA's programs.
- Adopt rent policies and assess any programs that support and encourage work and/or homeownership.
- Continue to partner with local & regional workforce partners to increase the number of employed/under-employed persons in assisted housing.
- Provide programs, tools and resources for job skills development, job training and employment of public housing residents through resident programs and services, Section 3 program, scholarships, and other available resources.
- Increase resident and voucher holder participation in the Family Self-Sufficiency (FSS) program.

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

N/A

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

Introduction

The need for affordable housing and community development activities were common themes expressed throughout the 2020 Consolidated Plan survey. According to the survey respondents, the most important public service needs related to persons experiencing homelessness and persons with other special needs are mental health counseling, health services, domestic violence services, and senior services. One respondent noted the importance of never losing electricity, which is an activity that can substantially assist persons with special needs shelter in place during a disaster or return home after a disaster quickly. Historically, the City has provided support to the City's elderly residents using CDBG for its home repair program and the City will continue to implement this program during PY 2020-2021.

Specific to persons experiencing homelessness, the survey respondents highlight homelessness prevention activities which includes rental assistance and rapid rehousing, outreach to persons experiencing homelessness, and permanent housing as the highest need activities in the jurisdiction. Other moderately ranked activities related to persons experiencing homelessness and other persons with special needs identified in the Survey include transportation assistance, substance abuse education/services, services for person with disabilities, services for neglected/abused children, and youth services.

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

Providing outreach to persons living in an unsheltered location brings services to individuals who may otherwise choose to not seek out services which can aid in their recovery and resolve their homeless episode. The City relies on the CoC to develop and execute strategies to identify and engage person who are unsheltered and staying in an uninhabitable location within the City.

The Southeast Behavioral Health Network (SEFBHN) funds Mobile Response Teams, through South County Mental Health Inc., with the goal of preventing unnecessary psychiatric hospitalizations. Mobile Response Teams provide mobile crisis intervention services for all of Palm Beach County.

The City will continue to work in coordination with the Homeless and Housing Alliance, the CoC, to support evidence-based initiatives to engage and rehouse persons experiencing literal

homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Lewis Center is the access point for persons experiencing homelessness and in need of assessment, services, and shelter in Palm Beach County. The City will continue to support the Lewis Center and CoC network by participating in CoC meetings and has contributed to fundraisers in the past.

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 City continues to participate in CoC-led meetings to support the Homeless and Housing Alliance's efforts of making homelessness rare, brief, and one-time in the community. The City's residents who participated in the 2020 Consolidated Plan survey emphasized their desire for increased affordable housing in the City, which is an essential component of ending homelessness. Increasing the supply of affordable housing will decrease the amount of time people experience a homeless episode, as permanent housing is the solution to ending a crisis caused by lack of housing. Supportive housing programs offer financial assistance toward rent paired with supports intended to help households stabilize and retain their housing, among other recovery supports.

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

To ensure low- and moderate-income households and those with special needs avoid homelessness, the City will dedicate CDBG funding to a home rehabilitation program to make housing units more affordable and improve the housing conditions.

Palm Beach County will continue to use local, state, and federal funding to support numerous homeless prevention activities including, but not limited to, providing financial assistance for emergency rent and/or utility payments, the Traveler's Aid Program that provides relocation assistance to homeless individuals and families who find themselves stranded in Palm Beach

County, participation in the Reentry Task Force whose mission is to implement comprehensive re-entry services to ex-offenders, and the Lewis Center will continue to coordinate with area hospitals and mental health facilities to permit discharged patients to receive referrals to the Lewis Center to access homeless services.

Discussion

The City relies on Palm Beach County, Homeless and Housing Alliance, the Southeast Florida Behavioral Health Network, and other funders of services and housing to develop and execute strategies that benefit persons experiencing homelessness and other persons with special needs in the City due to funding and capacity limitations.

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

Introduction:

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing. The City of Palm Beach Gardens recognizes that there can be institutional, regulatory, or policy barriers to development and promotion of access to affordable housing. Some of these barriers are at the discretion of City policymakers. Generally, the following barriers may impact the development of affordable housing:

- Development approvals process: the development approval process can be time- and resource-intensive, particularly for developers of affordable housing.
- Density restrictions: depending on the maximum allowable density in any given zoning category, higher density housing developments may be prohibited. Higher density housing is typically able to absorb more income-restricted housing and still maintain profitability for the developer, in addition to naturally enhancing the availability of housing overall.
- Parking and setback requirements: depending on the restrictions of parking and setbacks in the local land use code and comprehensive plan, these requirements may prohibit development of affordable housing.
- Affordable housing accessible to transit: low-income households are more likely to depend on public transportation as a means of mobility. A lack of affordable housing near public transportation networks places an inherent restriction on a family's ability to reasonably access housing.
- Not in My Back Yard (NIMBY) Syndrome: the social and financial stigma of affordable housing can lead to significant resistance from community members.

The City developed an Analysis of Impediments to Fair Housing Choice (AI) to identify impediments or barriers to affordable housing and fair housing choice and plans to take actions toward the resolution of the barriers. In 2020 the City updated its AI and identified the following impediments that may have an impact on the availability of affordable housing:

1. Single-family zoned communities making up a majority of Palm Beach Gardens do not allow a mix of housing types or accessory dwelling units.
2. Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.

3. HOAs are a prominent feature of the built environment in Palm Beach Gardens, suggesting a need for consistent and professional training on fair housing rights, best practices, and regulations for HOAs.
4. The most common reason for home loan denial is poor credit history.

During 2019, The City engaged a consultant, Strategic Planning Group, to develop a Workforce Housing Program. The Workforce Housing Report will be adopted in November 2020 and identifies a variety of solutions for increasing the housing options available to middle-income workers in the City. The workforce housing solutions include establishing a housing trust fund, permitting accessory dwelling units in certain communities with larger lots, and a number of incentives to encourage developers to include workforce housing in projects such as, density bonuses, waiving or crediting of impact fees, and waiving building permit application review fees.

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 identified the following actions to increase the supply of affordable housing and to address the impediments in the AI related to zoning policies and practices:

1. Increase densities in downtown areas and create more missing middle and mixed-use zones.
2. Allow ADUs by right in most residential zones.
3. Establish a process for considering the suitability of current and/or future city-owned properties for affordable housing development and prioritize affordable housing development for suitable properties.
4. Work with affordable housing developers, particularly nonprofit developers, to construct subsidized housing.
5. Conduct a study of existing land use and zoning regulations to determine avenues for permitting, by right, a mix of housing types and sizes.

In addition, the Housing Element of the City's Comprehensive Land Use Plan addresses the City's desire to combat barriers to affordable housing. The Housing Element includes the following goals and objectives in support of affordable housing:

GOAL 3.1.: THE PROVISION OF SUSTAINABLE, SAFE AND SANITARY HOUSING WHICH MEETS THE NEEDS OF ALL EXISTING AND FUTURE PALM BEACH GARDENS RESIDENTS.

- Objective 3.1.1.: Strive to fulfill the City housing needs while promoting sustainable and energy efficient standards.
- Objective 3.1.2.: Assist the private sector to provide housing of the various types, sizes, and costs to meet the housing needs of all existing and anticipated populations of the City. Toward this objective, the City shall maintain land development regulations, consistent with Section 163.3202 F.S., to facilitate public and private sector cooperation in the housing delivery system.
- Objective 3.1.3.: Continue to identify and assess any substandard units located within the City limits.
- Objective 3.1.4.: Encourage housing and supportive services for the elderly and special needs residents.
- Objective 3.1.5.: Provide for adequate sites for group homes, manufactured homes and mobile homes to ensure that the needs of persons requiring such housing are met.
- Objective 3.1.6.: Through continued monitoring and enforcement of building and housing codes, the City shall strive to conserve and extend the useful life of the existing housing stock and stabilization of older neighborhoods.

GOAL 3.2.: THE PROVISION OF AFFORDABLE AND WORKFORCE HOUSING BY PRESERVING EXISTING STABLE NEIGHBORHOODS, REHABILITATING NEIGHBORHOODS THAT HAVE DECLINED, AND DEVELOPING NEW RESIDENTIAL DEVELOPMENTS.

- Objective 3.2.1.: Promote programs and other means to ensure that affordable and workforce housing are provided to residents of all income ranges to sustain a balanced community and economic growth.
- Objective 3.2.2.: Continue to designate adequate sites with appropriate land use and density on the Future Land Use Map, the City shall ensure that adequate supply of land exists in the City for the private sector to provide for the housing needs of the extremely low, very low, low and moderate income families, essential service personnel, the elderly, and special need residents.

Each objective of the Housing Element also includes several policies in support of affordable housing initiatives. The complete Housing Element and its polices can be found at

<https://www.pbgfl.com/DocumentCenter/View/93/Housing-PDF>.

The City will also combat barriers to affordable housing through its Housing Rehabilitation Program. This Program will help address poverty (e.g. low-income homeowners) and remove possible life safety housing hazards including roof repair and accessibility for the disabled and special needs individuals.

AP-85 Other Actions – 91.220(k)

Introduction:

The City recognizes that the needs of its residents extend beyond housing and infrastructure. These needs include reducing lead-based paint hazards, reducing poverty, developing institutional structures, and enhancing coordination between public and private social service agencies. The following is a list of actions that the City intends to implement during PY 2020-2021 to achieve success in addressing the housing and community development needs of low- and moderate-income residents.

Actions planned to address obstacles to meeting underserved needs.

There are various obstacles to meeting needs within the City. The primary obstacle to meeting underserved needs is insufficient resources to meet the needs identified in the outreach conducted for this Action Plan. Addressing all housing, homeless, and community development needs is a difficult task due to lack of funding. The City will utilize all possible resources and endeavors to secure additional private and public sources of financing over the course of the program year to meet underserved needs.

Participation in the CDBG program and the relationship with HUD has spring-boarded the City into studying and participating in working toward a solution for the affordable housing crisis in Palm Beach County. The City's Comprehensive Plan includes provisions for exploring workforce housing density bonuses and expedited permitting. Strategic Planning Group, a consultant hired by the City to develop a Comprehensive Workforce Housing Study, finalized its report in 2020 and it identifies strategies or solutions the City will pursue to increase the supply of workforce housing.

The current housing market and economic environment also serve as barriers to meeting needs as rental rates and home values have significantly increased while incomes have stayed stagnant increasing the number of families and individuals needing access to housing assistance.

Actions planned to foster and maintain affordable housing.

To foster and maintain affordable housing, the City will implement the actions outlined in its Analysis of Impediments to Fair Housing Choice.

The City will also maintain affordable housing through its Housing Rehabilitation Program. This Program will help address poverty (e.g. low-income homeowners) and remove possible life safety housing hazards including roof repair and accessibility for the disabled and special needs

individuals.

Actions planned to reduce lead-based paint hazards.

The State of Florida's Department of Health works closely with local governments to ensure the goals of the eliminating childhood lead poisoning program are met. The primary goal is to eliminate lead poisoning in children under 72 months of age. Local initiatives include the coordination of case management, development of primary prevention strategies, building partnerships, and increasing the number of blood lead screenings in children.

The City will require mandatory lead-based paint inspection, both interior and exterior, of all qualified applicants to the City's CDBG rehabilitation program in accordance with the monetary thresholds established in the federal guidelines, and related abatement if necessary. If the City comes across a project where lead-based paint is identified as an issue, the City will address and take appropriate steps to reduce the hazard. Staff will also distribute required lead-based paint educational materials to each applicant during the assistance application intake process. The homeowner is provided copies of the original test report and the clearance report, if applicable.

Actions planned to reduce the number of poverty-level families.

The City will continue to carry out goals and objectives established within the Consolidated Plan to assist in reducing poverty by implementing projects and activities that have been identified as the most beneficial to its residents and to assisting families in need.

The City will continue to partner with both public and private entities to address the needs of low- and moderate-income families as well as addressing families living in poverty. The City also assists residents in locating existing services in Palm Beach County and other municipalities.

Actions planned to develop institutional structure.

The City's Planning and Zoning Department serves as the lead entity in carrying out the Consolidated Plan. The City coordinates its limited resources through a single department which facilitates the coordination of all rehabilitation efforts targeted to low-to-moderate income households throughout the City. Staff coordinates efforts with other Palm Beach County governmental agencies as well as neighboring cities, via regular communication with the staff responsible for administering the housing and community development programs. The City has developed sufficient capabilities for implementing and administering programs in house and continues to foster agency coordination. Collaboration between local, county, and state agencies is important in successfully carrying out the goals and objectives identified in the Consolidated Plan and addressing community needs.

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

The City has made great efforts to increase agency coordination by continuing to communicate the City's strategic goals. It is essential that the Planning and Zoning Department foster and maintain partnerships with other departments, agencies, and organizations to ensure housing and community development goals are consistent with other planning initiatives. Coordinating efforts has proven to be more impactful and effective when delivering programs and services.

The City has a resources page on its website which lists available social services that may help the public find various kinds of assistance. The City will continue to reach out and communicate to the public the different avenues to access assistance.

Program Specific Requirements

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

Introduction:

The City of Palm Beach Gardens expects to have \$237,610 in CDBG funding available during program year 2020-2021. The funds will be used for eligible activities including Public Infrastructure Improvements and Planning and Administration.

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	

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.	100.0%

Appendix - Alternate/Local Data Sources

1	Data Source Name HUD
	List the name of the organization or individual who originated the data set. HUD
	Provide a brief summary of the data set. The data set was provided by IDIS.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? Based on 2011 and 2013 American Community Surveys.
	What is the status of the data set (complete, in progress, or planned)?

Attachments

Citizen Participation Comments:

- Affidavit of Advertisements
- Sign-in Sheet
- Summary of Survey Results

Grantee SF 424's and Certifications