

CITY OF PALM BEACH GARDENS
ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE
PY 2020-2024
(OCTOBER 1, 2020 – SEPTEMBER 30, 2025)



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Introduction

The City of Palm Beach Gardens receives federal funding from the U.S. Department of Housing and Urban Development (HUD) to conduct housing and community development activities under 24 CFR Part 91: the Consolidated Planning process. The Consolidated Planning process combines planning and reporting requirements for major federal grants, including a grant received by the City of Palm Beach Gardens called the Community Development Block Grant (CDBG). As a recipient of entitlement funding from HUD, the City of Palm Beach Gardens is required to submit a certification to HUD that it will affirmatively further fair housing (AFFH). Prior to September 8, 2020, this certification required the completion of an Analysis of Impediments (AI) to Fair Housing Choice. However, on August 7, 2020, HUD issued final rule “Preserving Community and Neighborhood Choice” (85 FR 47899) which eliminated the AI requirement for entitlement jurisdictions. In its place, HUD only requires that entitlement jurisdictions take “affirmative steps to further fair housing policy during the relevant period.” This new interpretation of the AFFH requirement does not prevent an entitlement jurisdiction from developing an AI fair housing analysis. The City of Palm Beach Gardens is committed to advancing fair housing and considers the AI an important component of identifying barriers to fair housing choice and identifying actions to address them.

HUD has a commitment to eliminate discriminatory practices in housing and an obligation under Section 808 of the Fair Housing Act (FHA) to encourage the adoption and enforcement of fair housing laws in federally funded housing and community development programs. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and regulations in 24 CFR part 1, prohibit discrimination in any program or activity funded in whole or in part by federal funds made available under this part. In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, which prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within CDBG programs or activities. In addition to federal anti-discrimination statutes, the Palm Beach County Fair Housing Ordinance (Palm Beach County Code of Ordinances, Volume I, Chapter 15, Article 3 Housing, Places of Public Accommodation) offers protections to additional classes. The Palm Beach County Ordinance protects all of the following classes: race, sex, color, religion, national origin, disability, familial status, sexual orientation, age, marital status, or gender identity or expression.

To satisfy the certification requirement, and in pursuit of equal access to opportunity and affirmative enforcement of the FHA, the City of Palm Beach Gardens contracted with the Florida Housing Coalition, Inc. to develop this AI. The City of Palm Beach Gardens will monitor progress made on the plan and assess fair housing challenges and opportunities over the next five years.

Purpose of the Report

Equal access to housing is fundamental to the health, livelihood, and success of each person, and an important component in the long-term sustainability of local communities across the country. Strong enforcement and affirmative outreach on fair housing law and policy strengthens pursuit of personal, educational, and employment goals at the individual level, and supports equitable access to opportunities in the community. Because housing is so critical to personal development, fair housing is a goal that public officials and private citizens must embrace for a vision of equality of opportunity to become a reality. In recognition of equal housing access as an essential right, the federal government, the State of Florida, and Palm Beach County have all established fair housing choice as a right protected by law. Fair housing, while required by law and a moral issue, is also an economic issue. No community can reach its full potential for economic growth and well-being if its residents are unable to participate fully in the housing market.

Segregated housing causes unequal education, unequal access to jobs, and unequal income. Studies have clearly shown the relationship between housing, education, jobs, and the ability to build equity through home ownership. Home-seekers who do not have access to all of the available housing choices may not be able to take advantage of living in neighborhoods that provide access to opportunity. Just as the federal, state, and County governments have recognized the fundamental importance of equal access to housing, so does the City of Palm Beach Gardens.

This report analyzes impediments to fair housing choice including any actions, omissions or decisions taken because of a protected class under the FHA, or any other arbitrary factor which restricts housing choices or the availability of housing choices. Pursuant to HUD regulations (24 CFR 91.225(a)), in order to receive entitlement funds each entitlement jurisdiction must certify that it will affirmatively further fair housing (AFFH) through Fair Housing Planning. Fair Housing Planning entails:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI).
- Implementation of action plans to eliminate any identified impediments.
- Maintenance of AFFH records corresponding with implementation of the Consolidated Plan every three to five years.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in jurisdictions and working toward its elimination.
- Promoting fair housing choice for all people.
- Providing racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities.
- Fostering compliance with nondiscrimination provisions of the FHA.

This report analyzes conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and limit access to opportunity and developing solutions to mitigate or remove such impediments.

Summary of Findings

Through a comprehensive review of data and policies, this report identified the following findings:

1. Demographics
 - a. The population of Palm Beach Gardens has more than doubled over the last 28 years (Table 1: City of Palm Beach Gardens Population from 1990 through 2018)
 - b. The median age in Palm Beach Gardens is 51.2 years old, compared to just 37.9 for the country as a whole and 41.9 for the State of Florida.
 - c. While still the minority, Black/African American and Hispanic populations have tripled over the last thirty years (Table 3: Population by Race over Time)
 - d. The average household has 2.24 members, smaller than the national average of 2.52 (Table 4: Household and Family Size)
2. Employment and Economics
 - a. There are relatively few low-income people living in Palm Beach Gardens, with most of the population making above \$50,000 (Figure 6: Palm Beach Gardens' Income Distribution)

- b. There are only small differences by race and ethnicity on school proficiency (Table 21: School Proficiency and Race), labor market engagement (Table 17: Labor Market Engagement Index and Race,) and poverty (Table 12: Low Poverty Index and Race).
- 3. Housing
 - a. The average home in Palm Beach Gardens has far more rooms than the average household has people, a mismatch that increases overall housing costs (Table 27: Number of Bedrooms)
 - b. The median home value in Palm Beach Gardens in 2018 was \$345,000. This is over 50% higher than the national average home value of \$204,900, but down by over \$10,000 from 2010.
- 4. Housing Discrimination
 - a. There are few formal fair housing discrimination complaints submitted to fair housing organizations (Fair Housing Complaints or Compliance Reviews)
 - b. Disability is the basis for a majority of discrimination complaints in the City (Table 42. Basis for Housing Discrimination Cases in City of Palm Beach Gardens, 2015-2020.)
 - c. Residents of the City of Palm Beach Gardens do not receive regular training or outreach on fair housing rights and regulations.
- 5. Public Sector Impediments
 - a. The majority of Palm Beach Gardens' residential zoned land, and total land area, is zoned at a very low density which may drive up housing costs (Zoning and Site Selection).
- 6. Lending & private sector
 - Loan denial rates are highest for Hispanics for all home loan applications as reported by Home Mortgage Disclosure Act (HMDA) data (Table 44. Loan approval and denial rates by applicant race/ethnicity, City of Palm Beach Gardens census tracts, 2018*
 - a. Source: FFIEC 2018 Home Mortgage Disclosure Act Data)
 - b. Credit history is the most cited reason for home loan denial (Table 45. Reasons for Loan Denial by Applicant Race and Ethnicity, City of Palm Beach Gardens census tracts, 2018.)

Given the findings listed above, the Impediments and Action Plan section details the actions that the City of Palm Beach Gardens will pursue to affirmatively further fair housing.

Summary of identified impediments to fair housing choice and actions for addressing them

#	Impediment	Actions
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.	<ol style="list-style-type: none"> 1. Pursue opportunities for increasing density in downtown areas and creating a greater supply of workforce housing and mixed-use zones. 2. Allow accessory dwelling units (ADUs) by right in most residential zones.
2	Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.	<ol style="list-style-type: none"> 1. 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. 2. Work with affordable housing developers, particularly nonprofit developers, to construct subsidized housing. 3. Conduct a study of existing land use and zoning regulations to determine avenues for permitting, by right, a mix of housing types and sizes.
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.	<ol style="list-style-type: none"> 1. Support a fair housing organization to offer training and outreach to HOA Boards in Palm Beach Gardens.
4	The most common reason for home loan denial is poor credit history.	<ol style="list-style-type: none"> 1. Fund or partner with a HUD-certified credit counseling agency to support credit counseling services for low- and moderate-income protected class members in Palm Beach Gardens.

Jurisdictional Background

Palm Beach Gardens history as a city goes back a few decades to the 1950s. Incorporated, designed, and driven by John D. MacArthur, the billionaire businessman and philanthropist who formed the John D. and Catherine T. MacArthur foundation with his wife Catherine T. MacArthur, the land that would make up Palm Beach Gardens was purchased in the 1950s while much of Florida was still sparsely populated. Mr. MacArthur, “Mr. Mac” as he came to be known to residents, incorporated the almost completely unpopulated Palm Beach Gardens in 1959. The City’s original councilmen were appointed directly by MacArthur and served 5, rather than standard 3-year terms, in order to extend his influence. Without any residents, MacArthur was able to create planning districts for schools, churches, residential areas, parks, and commercial areas to his preference. Today, Palm Beach Gardens is home to over 55,000 people.

Community Profile

The goal of the Community Profile is to provide data and analysis to help guide decision makers in the City of Palm Beach Gardens towards the adoption of policies and practices that address impediments to fair housing choice and utilize CDBG funding for strategies that have the greatest impact for low- and moderate-income residents and persons protected by fair housing laws. The Community Profile primarily draws from the 2018 5-year American Community Survey results, created and published by the US Census. This survey provides the most in-depth information available on population, income and industry, and housing.

The Community Profile is divided into three sections:

The first section is the Demographic Profile, which looks at the City from the perspective of its people. Race and ethnicity, age, disability status, and other variables are explored. This section provides the foundation to determine who lives in the jurisdiction and what their needs are, including housing demand.

The second section, the Economic Profile, looks at the job market and the financial environment for residents. Factors like income, employment status, and poverty are analyzed and compared to factors in the demographic analysis to determine if disparities exist between racial and ethnic groups and persons with disabilities.

The third section is the Housing Profile, an overview of the City’s housing stock. Multiple housing variables are explored, including home values, rents, occupancy, and age of housing to provide a snapshot of the physical environment of region. This section establishes the supply of the available housing, including affordable housing, and the degree to which it meets demand.

Together, these pieces provide a data-driven view of the jurisdiction that will advance fair housing planning efforts and help identify impediments to fair housing choice.

Demographic Data

The Demographic Profile describes the people and families that make up Palm Beach Gardens. Understanding who lives throughout the jurisdiction, where they live, and how that has changed provides a starting point for identifying factors that contribute to fair housing choice. This process requires

exploring several demographic variables for protected class groups such as race and ethnicity, age, disability status, and others. This information allows the City to answer one of the most important questions when addressing fair housing issues, who needs assistance. Understanding the demographics of the City and how they have changed is necessary before policy can be implemented.

Population Growth

Race is a protected class and one of the most common bases for discrimination. The following chart provides information on total population between 1990 and 2018. The population of Palm Beach Gardens spiked between 1990 and 2000 and remained steady between 2000 and 2018.

	1990	2000	2010	2018
Population	23,771	46,712	46,712	54,528

Table 1: City of Palm Beach Gardens Population from 1990 through 2018

Source: 1990 Decennial Census, Table DP1; 2000 Decennial Census, Table DP1; 2010 Decennial Census, Table DP1; American Community Survey, Table DP05 2018: ACS 5 Year Estimates

Sex

Sex is a protected class. Men and women may be discouraged from living in certain neighborhoods or homes in a discriminatory way by real estate professionals or landlords with preconceived notions of how someone might act. Palm Beach Gardens has far more females than males, perhaps because women tend to live longer than men and Palm Beach Gardens has a of the large percentage of older residents (discussed below).

In Palm Beach Gardens, there are almost 20% more women (31,079) than men (25,207). This is most likely due to the high number of older, retired adults living in the city.

Palm Beach Gardens Population and Sex		
	#	%
Total:	56,286	---
Male	25,207	44.8%
Female	31,079	55.2%

Table 2: Population and Sex

Source: 2018 ACS 5 Year Estimates Table K200101

Age Groups

People can face discrimination on the basis of their age. Age discrimination may be directed to persons considered young, or to the elderly. In both cases, landlords, real estate brokers, and lenders make assumptions about behavior and financial capability in a discriminatory way.

The age distribution of a City is vitally important to the housing market and a jurisdiction's economy. The needs of residents can vary significantly depending on what stage of life they are in. Residents nearing or in retirement often seek to downsize into smaller homes and may prioritize accessibility and transportation options over other amenities. Young adults, particularly new families, have different housing demands and tend to look for homes they can grow into. Understanding how the age of the population is changing is important for determining demand for certain housing types and helps set

realistic fair housing goals for the City. The median age in Palm Beach Gardens is 51.2 years old, compared to just 37.9 for the country as a whole and 41.9 for the State of Florida.

The chart below shows the breakdown of Palm Beach Gardens residents by age. Palm Beach Gardens has few young adults and children (aged 24 and below) and a relatively high numbers of older adults, with those aged 70 – 74 years representing the group with the largest population share. The median age in Palm Beach Gardens is 51.2 years old compared to 41.9 years old in Florida and to 37.9 years old for the nation as a whole. The relatively limited number of working age adults may mean that younger workers find it difficult to find housing they can afford and that young people with children may face discrimination living in certain neighborhoods.

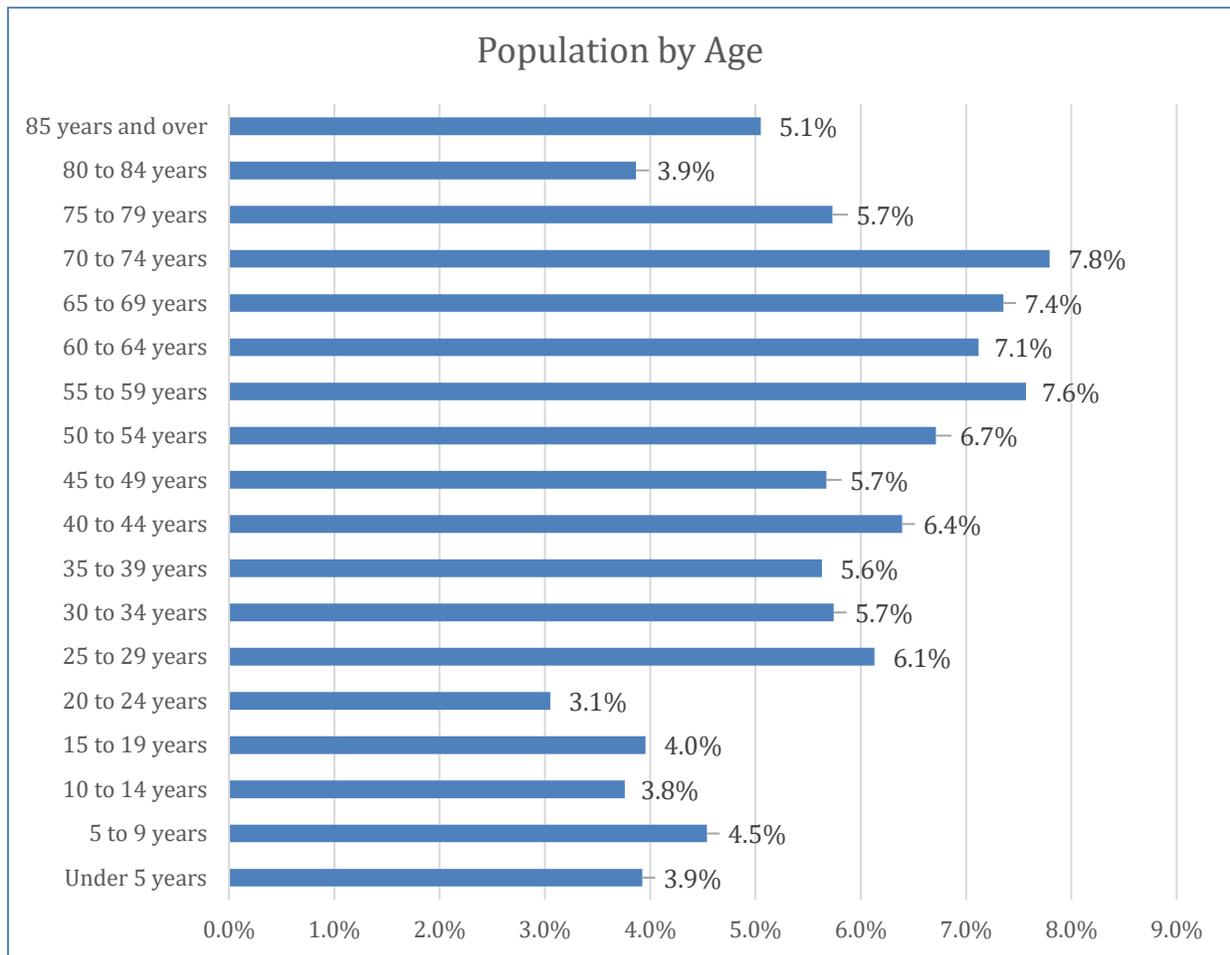


Figure 1: Population by Age
Source: 2018 5 Year ACS

Race/Ethnicity

Race is one of the most common characteristics that people note as a reason for discrimination in a discrimination complaint. Palm Beach Gardens is a majority White city with sizable Black/African American and Hispanic minority populations.

The table below shows the trends in the total population by race/ethnicity between 1990 and 2018. Today, the city is majority White (79.7%) with a large Hispanic minority (9.7%) and a small number of Black/African American (4.7%) and Asian (3.7%) residents. There are almost no American Indians/Alaskan Natives or Native Hawaiian and other Pacific islander residents in Palm Beach Gardens. However, White, non-Hispanics represent shrinking majority of residents in the city (from 93.9% in 1990 to 79.7% in 2018). Black and Hispanic populations have both risen since 2010, with Black populations rising from 0.8% to 4.7%, a significant increase though still representing a small share of the total population. The Hispanic population rose from 3.4% to 9.7%. Total population has risen dramatically, from 23,771 in 1990 to an estimated 54,528 according to the 2018 ACS.

	1990		2000		2010		2018	
	#	%	#	%	#	%	#	%
Hispanic or Latino (of any race)	800	3.4%	4,360	9.3%	4,360	9.3%	5,290	9.7%
White alone	22,331	93.9%	38,143	81.7%	38,143	81.7%	43,448	79.7%
Black or African American alone	187	.8%	2,026	4.3%	2,026	4.3%	2,561	4.7%
American Indian and Alaska Native alone	26	.1%	89	0.2%	89	0.2%	18	0.0%
Asian alone	339	1.4%	1,334	2.9%	1,334	2.9%	2,009	3.7%
Native Hawaiian and Other Pacific Islander alone	6	0.0%	299	0.6%	299	0.6%	9	0.0%
Some other race alone	82	.3%	93	0.2%	93	0.2%	63	0.1%
Two or more Races	NA	NA	368	0.8%	368	0.8%	1,130	2.1%

Table 3: Population by Race over Time

Source: 1990 Decennial Census, Table DP1; 2000 Decennial Census, Table DP1; 2010 Decennial Census, Table DP1; American Community Survey, Table DP05 2018: ACS 5 Year Estimates

The figure below shows the demographic change between 1990 and 2010 in geographic terms. The population spread westward between 1990 and 2010. While still mostly white, more Black/African American and Hispanic households can be seen in the City, particularly in the dense area in the south east part of the City.

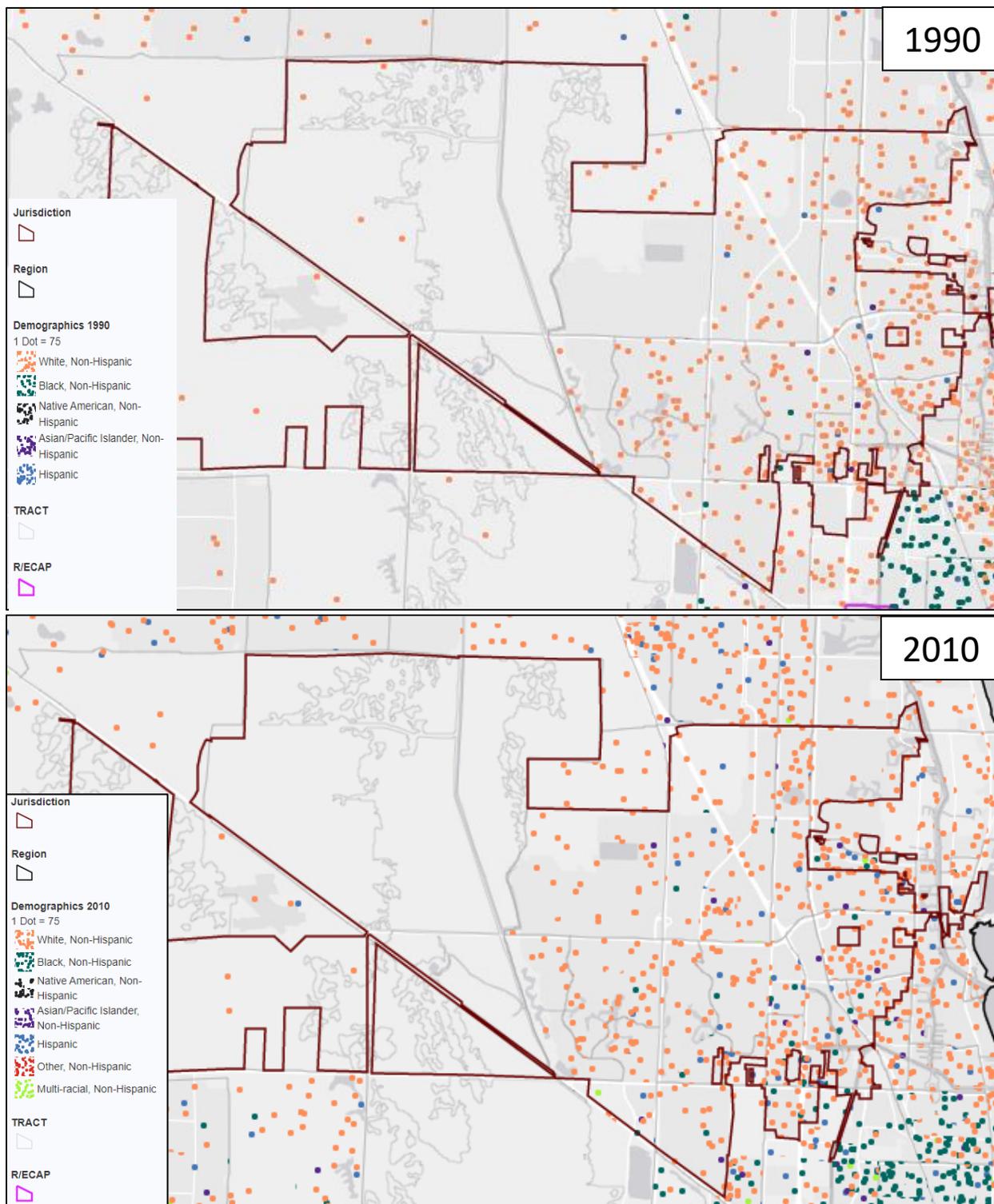


Figure 2: Map of Change in Population and Demographics
 Source: HUD AFFH Mapping Tool, [1990 and 2010] [map 2]

Racially/ethnically concentrated areas of poverty (R/ECAPs) are areas that meet HUD poverty and minority thresholds. There are no R/ECAPs in Palm Beach Gardens.

Familial Status

Familial status, or households with children under the age of 18, is a protected class under the Fair Housing Act, and holds long-term policy implications for housing development, land use, and regulations. Families can face discrimination based on stereotypes related to the conduct of children and the character and conduct of single and/or young mothers. Discrimination from landlords and property managers effectively limits housing choice for families.

Below is the number of households with children under 18 as well as the percentage of all households made up of families. There are 14,572 families, making up a majority (60.5%) of all households in Palm Beach Gardens.

Palm Beach Gardens, Household and Family Size	
Average household size	2.24
Total Households	24,090
Total families	14,572
Average family size	2.8
Percentage	60.5%

Table 4: Household and Family Size

Source: 2018 ACS 5 Year Estimates Table S1101

Disability

People with disabilities are a protected class under the Fair Housing Act and state and local fair housing ordinances. Persons with disabilities face a wide range of housing discrimination challenges based on reasonable accommodations in rental property and homeownership units, along with other discrimination. In a 2017 study conducted by HUD's Office of Policy Development and Research, researchers found that people with intellectual and developmental disabilities faced a negative stigma from housing providers and their agents; inappropriate requests to disclose personal, disability, and health related information; a lack of understanding about reasonable accommodations; and steering towards specific housing based on an individual's disability. People with disabilities, matched with people without disabilities to control for income, race, gender, and age, were dramatically less likely to receive responses to their inquiries about housing, were more likely to be told that advertised units were not available, were more likely to be steered away from the unit, and less likely to be offered a tour of the unit.

Residents who have a disability face additional challenges, particularly when it comes to housing. Finding affordable housing is even more difficult for those who need units that have or can be modified for wheelchairs, shower supports, ramps, and other accessibility aides. Communities with a relatively large elderly population should focus on this issue due to the close relationship between age and disability.

The barriers to equal and fair access to housing based on a disability depends on the nature of the disability. Persons with a vision difficulty face a different set of fair housing challenges compared to persons with a cognitive difficulty, for instance. In Palm Beach Gardens, the greatest share of persons with a disability are those with an ambulatory difficulty – those with difficulties moving unassisted without the aid of certain devices like a wheelchair or cane. The second highest share of persons with a disability is persons with an independent living difficulty. This group of persons includes those with a disability

because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.

People with a Disability in Palm Beach Gardens		
	#	%
With a hearing difficulty	2,201	4.1
With a vision difficulty	871	1.6
With a cognitive difficulty	1,810	3.5
With an ambulatory difficulty	3,428	6.6
With a self-care difficulty	1,404	2.7
With an independent living difficulty	2,471	5.4

Table 5: Disability by Type
Source: 2018 5 Year ACS Table S1810

Palm Beach Gardens has relatively low rate of disability (11.7%) compared to either the state (13.4%) or the country (12.6%). Black/African Americans (10.2%) are less likely than Whites (13.2%) in Palm Beach Gardens to have a disability, unlike the country overall. Hispanic and Latinos (5.5%) have a far lower disability rate than either group.

Disability in Palm Beach Gardens by Race		
	#	%
Black or African American alone	259	10.20%
American Indian and Alaska Native alone	18	22.50%
Asian alone	83	3.90%
Native Hawaiian and Other Pacific Islander alone	0	0.00%
Some other race alone	39	11.20%
Two or more races	30	2.30%
White alone, not Hispanic or Latino	5,702	13.20%
Hispanic or Latino (of any race)	292	5.50%

Table 6: Disability in Palm Beach Gardens by Race
Source: 2018 5 Year ACS Table S1810

The figure below shows the geographic distribution of people with disabilities in Palm Beach Gardens. People with disabilities are spread across the City, with a particular concentration in the more densely populated census tracts in the eastern portion of the City.

Palm Beach Gardens and People Experiencing Disability

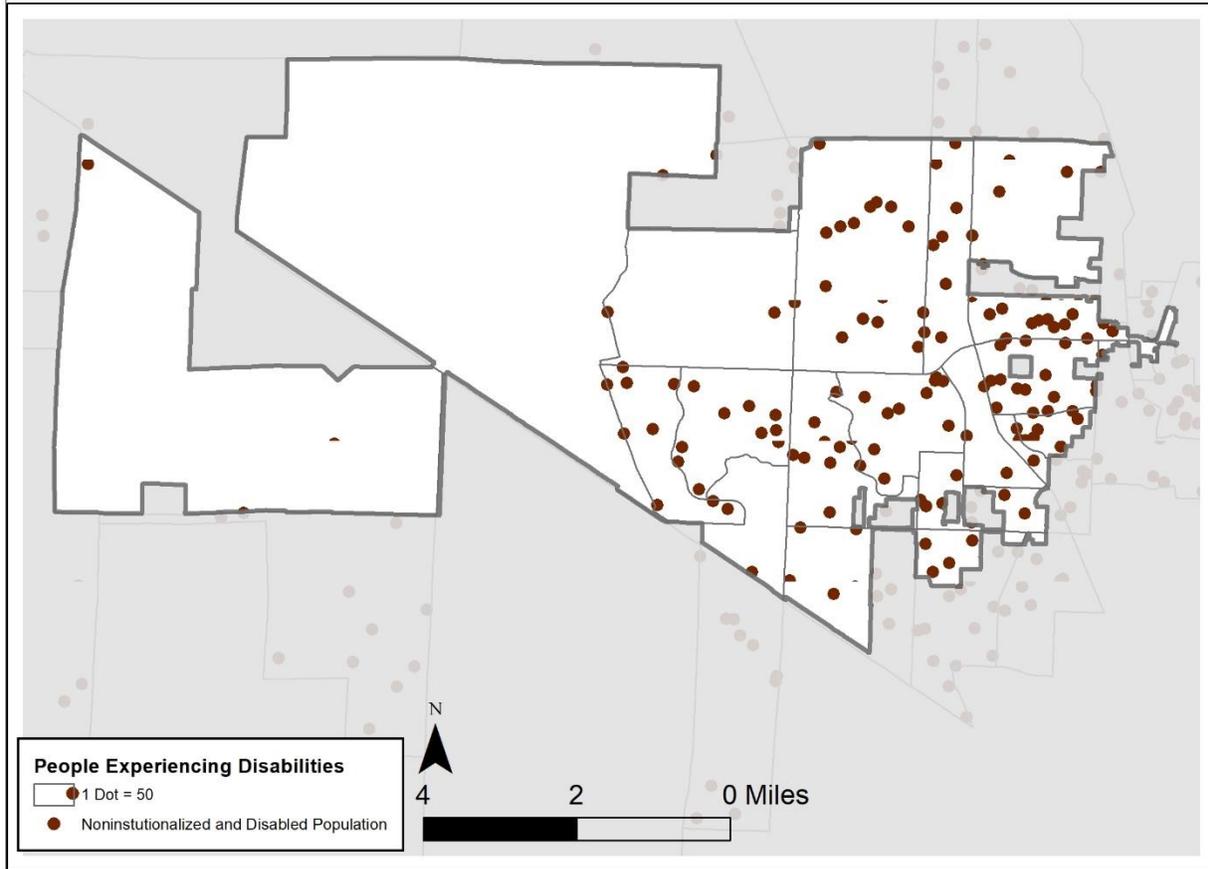


Figure 3: People with Disabilities in Palm Beach Gardens

Source: 2018 US Census TIGER Files, American Community Survey 5 Year Estimates, Table S1810

Foreign Born

National origin is a protected class under the Fair Housing Act. This section reviews data on the absolute number of native and foreign-born persons in Palm Beach Gardens and their share of the total population. People can discriminate against foreign born persons both intentionally and inadvertently.

Foreign born residents may also be related to other fair housing discrimination by revealing what language, skin color, and religious barriers a household might face. This section reviews the top ten non-US places of origin for Palm Beach Gardens residents.

Foreign Born Residents in Palm Beach Gardens		
	#	%
Total foreign-born population, excluding population born at sea	7,917	100%
Europe	2,119	26.8%
Asia	1,725	21.8%
Africa	200	2.5%
Oceania	27	0.3%
Latin America	3,236	40.9%
Northern America	610	7.7%

Table 7: Foreign Born Residents in Palm Beach Gardens
Source: 2018 ACS 5 Year Survey Table DP02

The largest number of foreign-born residents of Palm Beach Gardens are from South America, particularly Columbia. There are also sizable populations of European (26.8% of the population) and Asian (21.8%) residents living in Palm Beach Gardens.

Below is a map of the most common countries of birth for non-native residents mapped across Palm Beach Gardens. Foreign born residents are spread across the city.

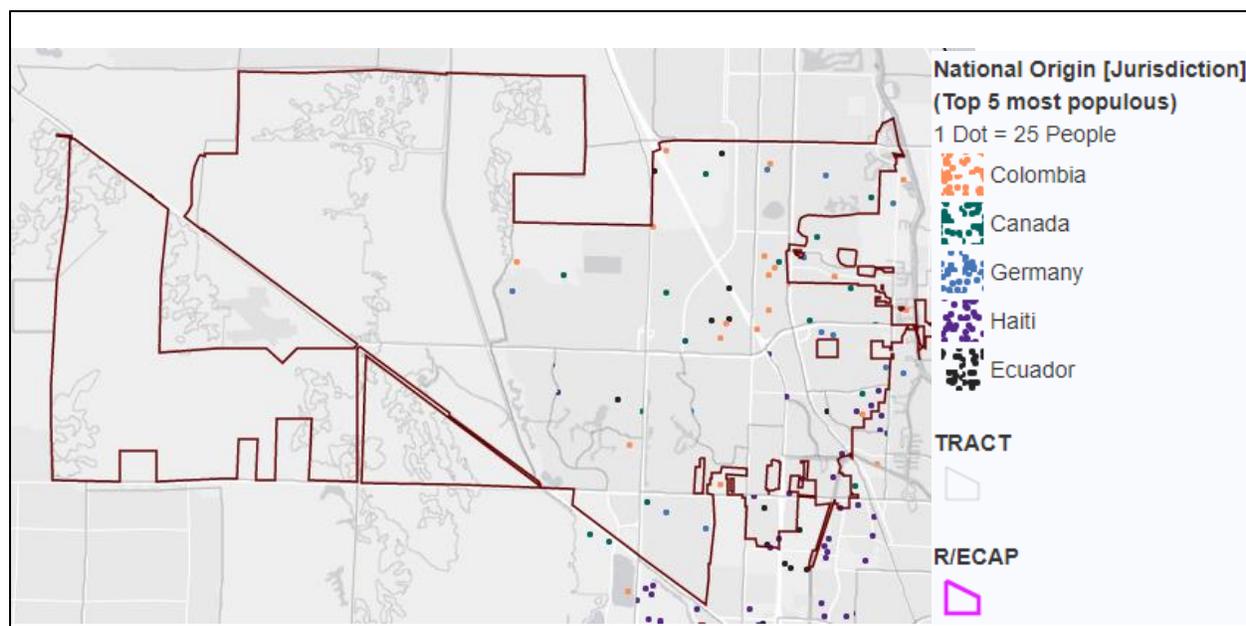


Figure 4: Non-Native National Origin in Palm Beach Gardens
Source: HUD AFFH Mapping Tool, [2017] [map 3]

Limited English Proficiency

While not a protected class under the Fair Housing Act, limited English proficiency (LEP) is recognized by HUD as a critical barrier to fair housing choice on the basis of national origin: that is, people in the foreign-

born protected class are disproportionately likely to be LEP. HUD issued guidance on LEP on September 15th, 2016, stating: “Housing providers are ... prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination. The law also prohibits landlords from using limited English proficiency in a way that causes an unjustified discriminatory effect.”¹

This section reviews the number of LEP households and the language families used in Palm Beach Gardens. People who exclusively speak Spanish are common in Palm Beach Gardens, with 1,855 residents with limited English proficiency speaking Spanish. Other LEP households speak other Indo-European languages such as German and Haitian French Creole, with relatively few speaking Asian and Pacific Islander languages or any other languages.

LEP Households by Language in Palm Beach Gardens		
	#	%
Spanish	1,855	7.70%
Other Indo-European languages	1,798	7.50%
Asian and Pacific Island languages	306	1.30%
Other languages	223	0.90%

Table 8: LEP Households by Language
Source: 2018 ACS 5 Year Survey Table S1602

LEP households roughly correlate with the geographic distribution of non-native born residents, with a concentration of speakers in the center/north east portion of the city and other non-native concentrated in the southeast.

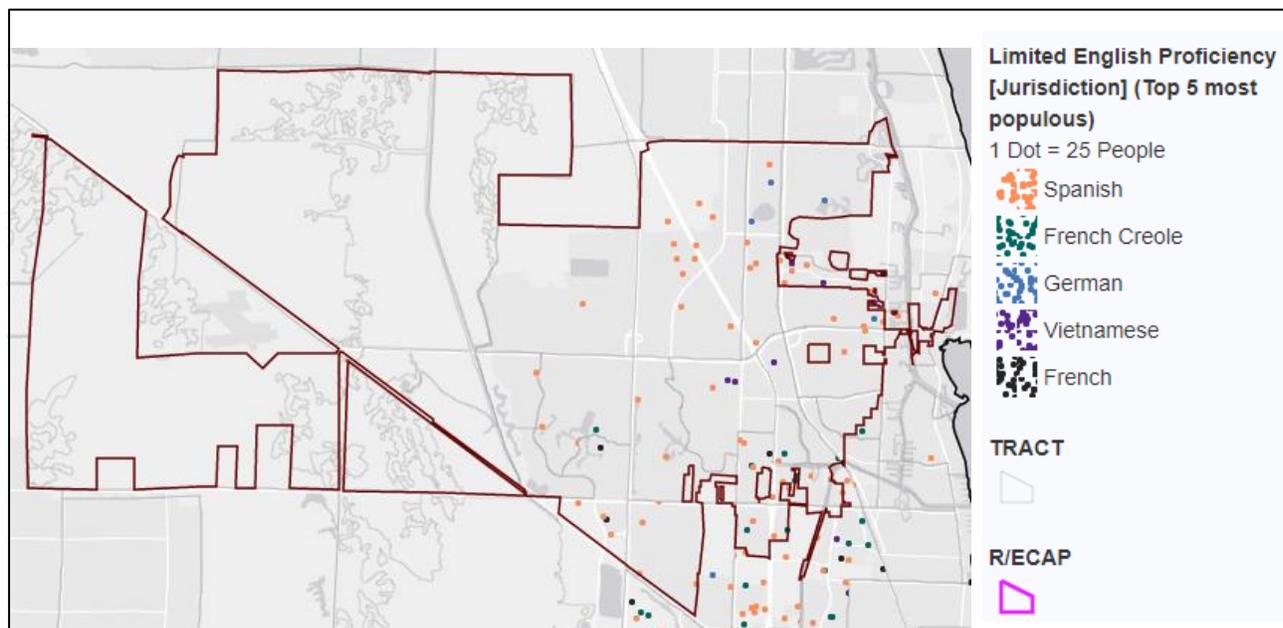


Figure 5: Map of LEP Households
Source: HUD AFFH Mapping Tool, [2017] [map 4]

¹ Office of the General Counsel, HUD, 2016. “Office of General Counsel Guidance on Fair Housing Act Protections for Persons with Limited English Proficiency.” HUD, Washington, DC.

Employment and Economic Data

The market for housing and the availability of affordable housing is tied to two forces: supply and demand. In theory, the market reaches an equilibrium where supply equals demand, but in practice it is much more complicated. Demand is not a static data point, it is the culmination of the needs, wants, and resources available to members of the population. An important factor in demand is the economic environment for households. Their income, employment opportunities, education, and availability of transportation all play a part in the demand for housing, both market-rate and affordable.

The following tables, graphs, and maps describe the economic state of Palm Beach Gardens' households.

Income and Poverty

Household Income Distribution

The chart below shows income by total share of the population in Palm Beach Gardens. The data demonstrates that a majority of residents in Palm Beach Gardens make over \$50,000, with a substantial number making over \$200,000 (15.3% of the total population). However, a substantial minority makes less than \$50,000, with over 4% making less than \$10,000. The median income of \$80,426 is far higher than either the state (\$53,267) or the country (\$60,293) and has increased by 12% from \$71,940 in 2010.

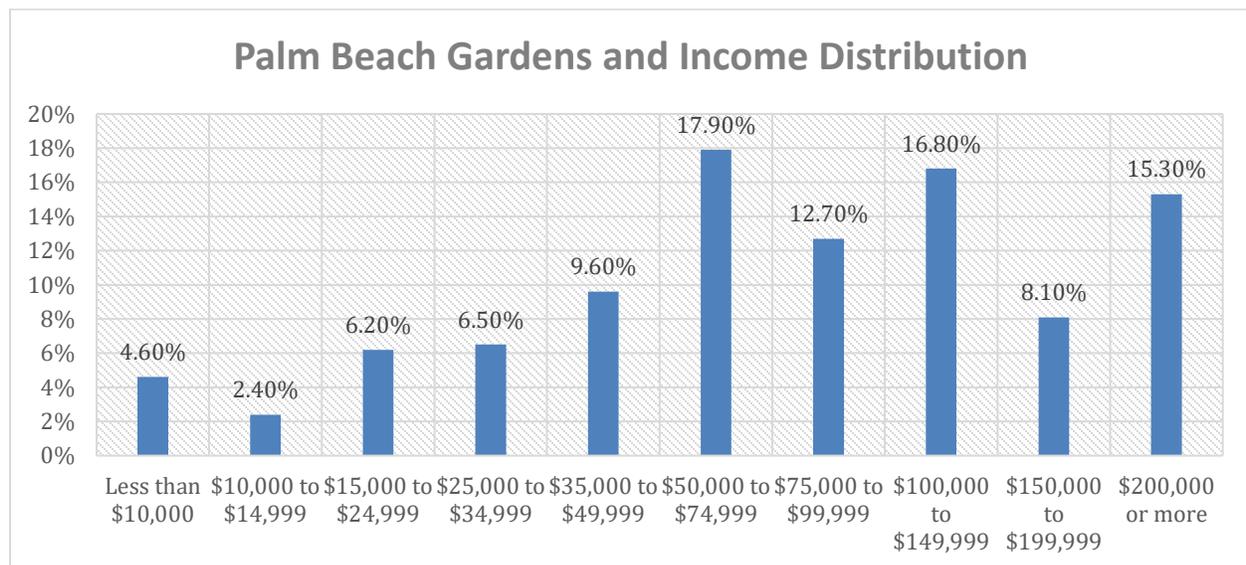


Figure 6: Palm Beach Gardens' Income Distribution
Source: 2018 ACS 5 Year Survey Table S1901

Median incomes in Palm Beach Gardens vary dramatically by race. Asian American households have the highest median income (\$94,735) followed by Hispanic households (\$82,096) and White households (\$80,949). Black households make a far lower median income (\$58,608), 73% of the AMI.

Median Income by Race & Ethnicity in Palm Beach Gardens	
Race or Ethnicity	\$
Black or African American	\$58,608

American Indian and Alaska Native	-
Asian	\$94,735
Native Hawaiian and Other Pacific Islander	-
Some other race	\$57,031
Two or more races	\$74,524
Hispanic or Latino origin (of any race)	\$82,096
White alone, not Hispanic or Latino	\$80,949

Table 9: Median Income by Race
Source: 2018 ACS 5 Year Survey Table S1903

Low- and Moderate-Income Population

Another useful point of data to examine the geographic distribution of residents by income is the share of residents meeting low- and moderate-income thresholds. This data, calculated by HUD and most commonly referred to as “Low-Mod” is helpful for understanding what percentage of a city is low-or moderate-income and helpful for visualizing where in a jurisdiction low- and moderate-income people live. At the time this report was written, the latest available estimates for the low-mod data were based on 2011-2015 ACS data.

City	LOW	LOW-MOD	% Low Mod
Palm Beach Gardens	7,910	15,120	29.89%

Table 10: Low-Mod
Source: HUD AFFHT0006 Raw Data Tables

Palm Beach Gardens is an exception grantee, so block groups may qualify as a low/mod area at 40.3% low- and moderate-income households, compared to a usual grantee where at least 51% is required. Even at this lower threshold, there are relatively few low-mod areas in Palm Beach Gardens. Those that exist are clustered in the southeastern parts of the City. These areas, when primarily residential, are eligible for investment from the CDBG program, and represent areas with the greatest need.

Palm Beach Gardens CDBG Low/Moderate Income Block Groups
2011-2015 American Community Survey

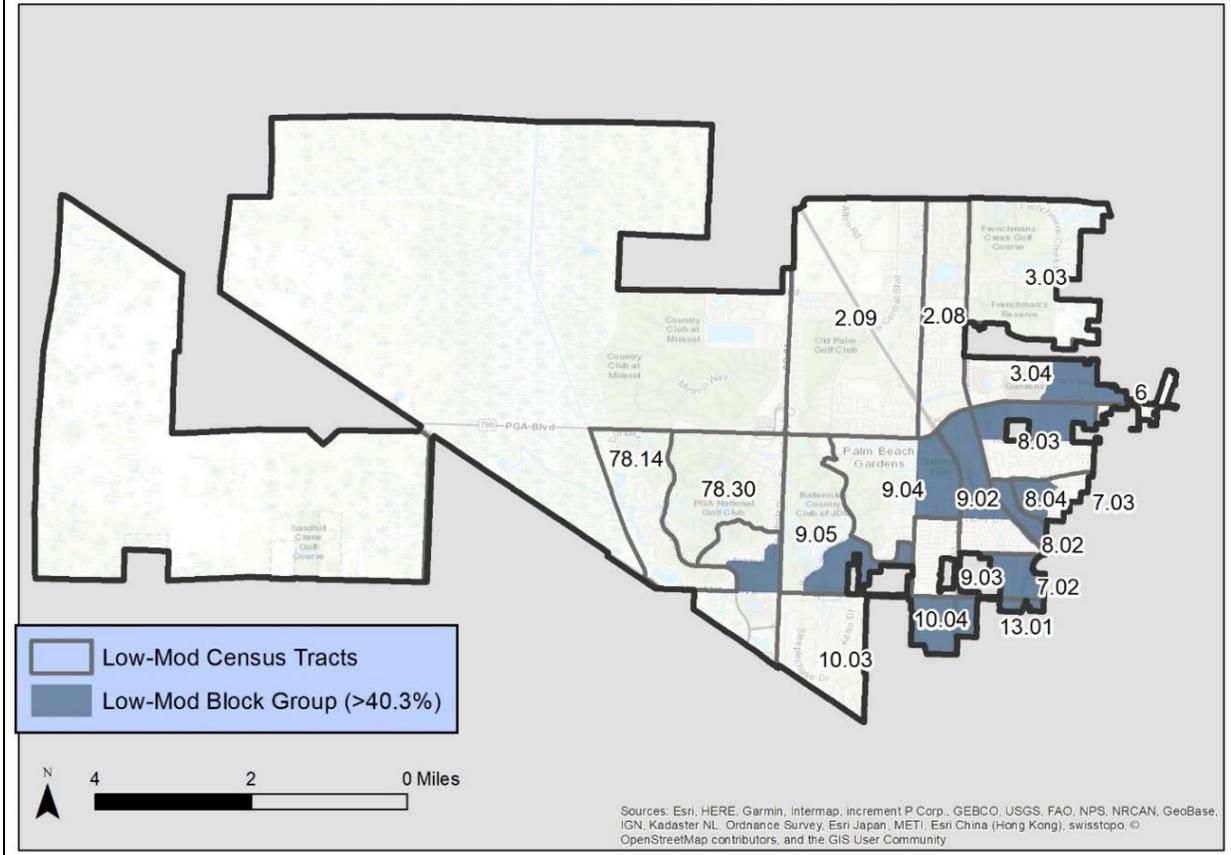


Figure 7: Low-Mod Census Tracts (>40.3%)
Source: HUD Low-Mod Data, 2016

Poverty

Poverty is, in general, considered to be a negative indicator of household economic mobility, housing security, and equal housing access. The poverty rate used by the Census, and used in this section of the AI, is based on a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. Income thresholds are regularly updated for inflation by the U.S. Census Bureau. Sources of income for the poverty threshold calculation include, but are not limited to: earnings, unemployment compensation, public assistance, interest and dividends, rental revenue, child support, educational assistance, and supplemental security income.

The following table details the population living under the poverty line disaggregated by age, sex, and race/ethnicity. While the poverty rate in Palm Beach Gardens is slightly higher for Black/African American residents than White residents (Black/ African Americans in Palm Beach Gardens have a poverty rate of 8.4% compared to 6.4% for Whites), age represents the largest factor for poverty status, with more working age adults (between the ages of 18-34 and 35-64) living in poverty than younger or older residents. Poverty in Palm Beach Gardens is far lower than the country (12.3%) or the state (12.7%).

Poverty in Palm Beach Gardens			
Population for whom poverty status is determined	Total Population	Below Poverty	Percent Below Poverty
		54,149	3,491
Age			
Under 5 years	2,101	75	3.6%
5 to 17 years	5,957	189	3.2%
Related children of householder under 18 years	8,019	225	2.8%
18 to 34 years	8,800	777	8.8%
35 to 64 years	21,258	1,421	6.7%
65 years and over	16,033	1,029	6.4%
Sex			
Male	24,934	1,256	5%
Female	29,215	2,235	7.7%
Race & Ethnicity			
White alone	47,777	3,070	6.4%
Black or African American alone	2,542	213	8.4%
American Indian and Alaska Native alone	52	0	0%
Asian alone	2,110	11	0.5%
Native Hawaiian and Other Pacific Islander alone	9	0	0%
Some other race alone	349	63	18.1%
Two or more races	1,310	134	10.2%
Hispanic or Latino origin (of any race)	5,246	236	4.5%
White alone, not Hispanic or Latino	43,183	2,888	6.7%

*Table 11: Poverty by Race and Ethnicity, Sex, and Age
Source: US Census 2018 5 Year ACS Survey, Table S1701*

Low Poverty Index

Areas with high concentrations of residents living in poverty have a negative effect on health, education, and quality of life. This section reviews data from the HUD Low Poverty Index. The low poverty index measures the degree of poverty existing within a given neighborhood. It uses both family poverty rates and the percentage of households receiving public assistance to determine a score. Index values are inverted, meaning areas with a high value are exposed to less poverty than in areas with a low value. The values are also percentile ranked at the national level – a value between 90 and 100 indicates the area is in the 90th percentile in the country.

There is significant variation in index values in Palm Beach Gardens, ranging from 18% to 97%. Of particular interest to this AI is the distribution of aggregate index values (see table below) by race/ethnicity. Whites are exposed to the least poverty in the City (75.04 overall), compared to Black/African American residents (63.96) who are exposed to the most poverty.

White	Black/African American	Hispanic	Asian	Native American
75.04	63.96	70.14	72.13	67.95

Table 12: Low Poverty Index and Race
 Source: HUD AFFHT0006 Raw Data Tables

While Palm Beach Gardens is an extremely wealthy city with a low overall poverty rate, there are still areas where almost everyone lives in poverty. The highest poverty census tracts in Palm Beach Gardens are in the southern and eastern portions of the City. Minorities are concentrated in mid-range poverty census tracts in the center of the City.

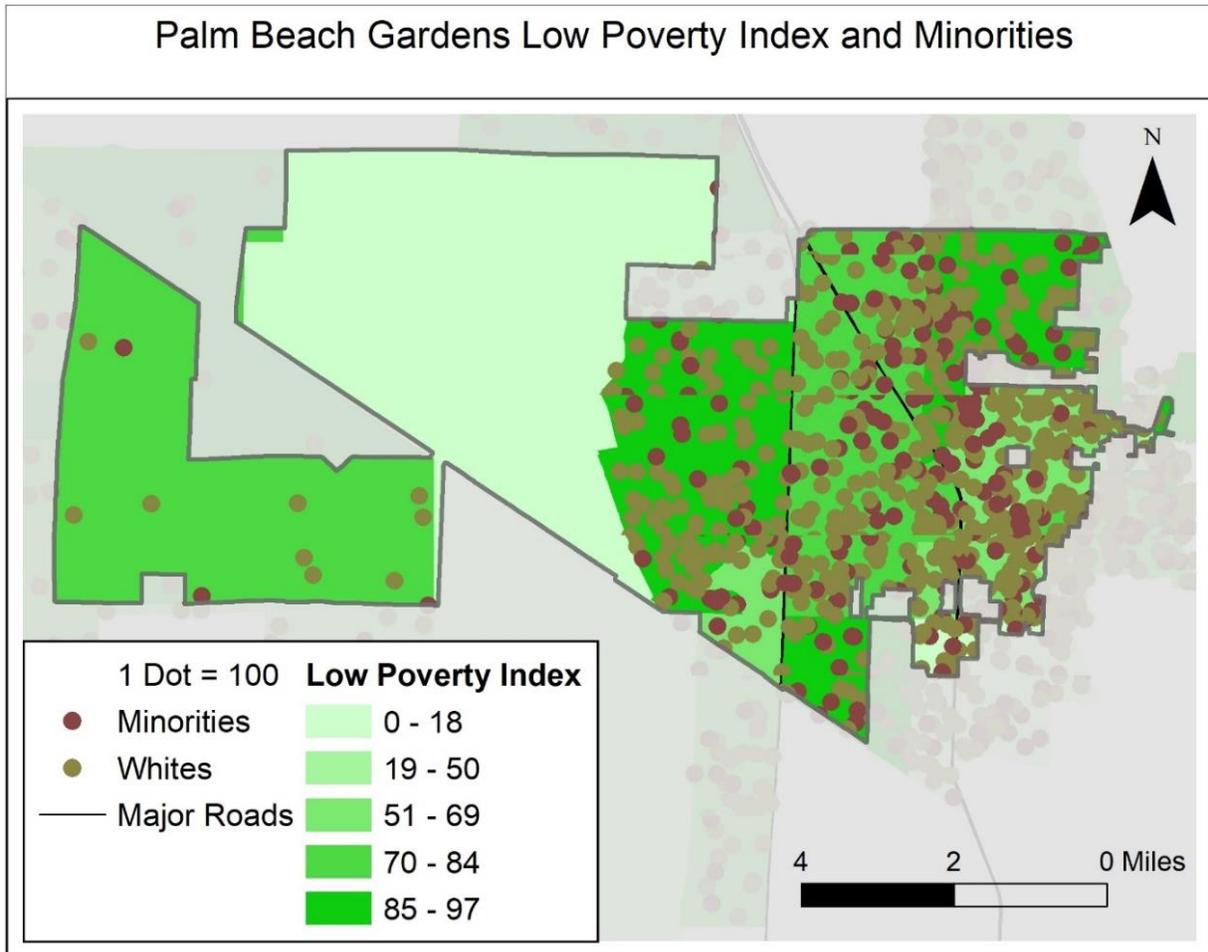


Figure 8: Low Poverty Index and Race
 Source: HUD Low Poverty Index, US Census 2018 ACS 5 Year Estimates

Employment

Share of Workers by Industry

The share of workers by industry is important to understand how the economy might respond to exogenous shocks and can identify underlying reasons for levels of inequality. Palm Beach Gardens has a huge number of people working in service industries such as education, healthcare and social assistance (18.8%) and Professional, scientific, and management, and administrative and waste management

services (16.3%) with a relatively high number of workers working in retail trade (10.8%) and the arts, entertainment, recreation, and accommodation and food service (13.7%). There are very few people working in information (2%) or agriculture, forestry, fishing and hunting, or mining (.3%).

In general, workers in the retail and food services industries are particularly vulnerable to housing cost burdens, inflationary pressure on local housing costs for both owner and rental units, and are more vulnerable to economic disruption from health and natural disasters.

Workers by Industry in Palm Beach Gardens		
	#	%
Civilian employed population 16 years and over	26,785	100%
Agriculture, forestry, fishing and hunting, and mining:	86	0.3%
Construction	1,218	4.5%
Manufacturing	1,730	6.5%
Wholesale trade	597	2.2%
Retail trade	2,901	10.8%
Transportation and warehousing, and utilities:	1,498	5.6%
Information	539	2.0%
Finance and insurance, and real estate and rental and leasing:	2,916	10.9%
Professional, scientific, and management, and administrative and waste management services	4,361	16.3%
Educational services, and health care and social assistance	5,034	18.8%
Arts, entertainment, and recreation, and accommodation and food services	3,669	13.7%
Other services, except public administration	1,566	5.8%
Public administration	670	2.5%

Table 13: Workers by Industry
Source: 2018 ACS 5 Year Survey Table S2403

Labor force statistics

The table below shows the labor force participation, employment/population ratio, and unemployment rate in Palm Beach Gardens. The unemployment rate for Whites is close to half that of Latinos and under a third of Black/African Americans, though labor force participation and employment/population ratio are dramatically lower, suggesting a large number of retirees.

The labor force includes all people classified as belonging to the civilian labor force, plus members of the US armed forces. The civilian labor force consists of people classified as employed or unemployed who are not in the US Armed Forces. The labor force participation rate is calculated by dividing the total number of persons in the labor force by the number of total person population over the age of 16.

The employment to population ratio is the number of employed persons as a percentage of the civilian noninstitutionalized population aged 16 and older. It is meant to show the percentage of the population that is currently working. People who are primarily ineligible, unable, or unlikely to participate in the labor force are residents of institutional group quarters. The institutionalized population is persons residing in

institutional group quarters such as adult correctional facilities, juvenile facilities, skilled-nursing facilities, and other institutional facilities such as mental (psychiatric) hospitals and in-patient hospice facilities.

The unemployment rate is calculated by dividing the number of unemployed persons by the number of persons in the civilian labor force. A person is considered unemployed if they are 16 years old and over and are classified as unemployed if they (1) were neither "at work" nor "with a job but not at work", and (2) were actively looking for work during the last 4 weeks, and (3) were available to accept a job. They are considered employed if they are 16 years old and over who were either (1) "at work" or (2) were "with a job but not at work."

Palm Beach Gardens Key Labor Statistics by Race/Ethnicity	Labor Force Participation Rate	Employment/Population Ratio	Unemployment Rate
White alone	56.70%	55.30%	2.40%
Black or African American alone	71.3%	65.7%	7.9%
American Indian and Alaska Native alone	100.0%	100.0%	0.0%
Asian alone	68.8%	67.1%	2.4%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	-
Some other race alone	77.8%	71.4%	8.2%
Two or more races	67.2%	65.9%	2.0%
Hispanic or Latino origin (of any race)	74.1%	70.5%	4.8%
White alone, not Hispanic or Latino	55.2%	54.1%	2.1%

Table 14: Labor Statistics by Race
Source: 2018 ACS 5 Year Survey Table S2301

Employment Status by Disability

In addition to overcoming fair housing barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at higher rates than the City's general population. While there are relatively few people with a disability in Palm Beach Gardens, they are disproportionately likely to be unemployed or not in the labor force. The chart below shows the number of people that are in the labor force, employed, unemployed, and not in the labor force by disability status.

Palm Beach Gardens and Employment by Disability	
In the labor force:	24,343
Employed:	23,707
With a disability	701
No disability	23,006
Unemployed:	636
With a disability	37
No disability	599
Not in labor force:	5,710

With a disability	1,124
No disability	4,586

Table 15: Disability and Labor Statistics
 Source: 2018 ACS 5 Year Survey Table C18120

Unemployment Rate Over Time

The following chart shows the unemployment rate in Palm Beach Gardens between 1990 and 2019. Palm Beach Gardens' unemployment rate follows the state and country as a whole, with spikes in the early 1990s, a smaller spike after the Dot-Com Bubble in the early 2000s, and a major spike during the great recession between 2008 and 2011.

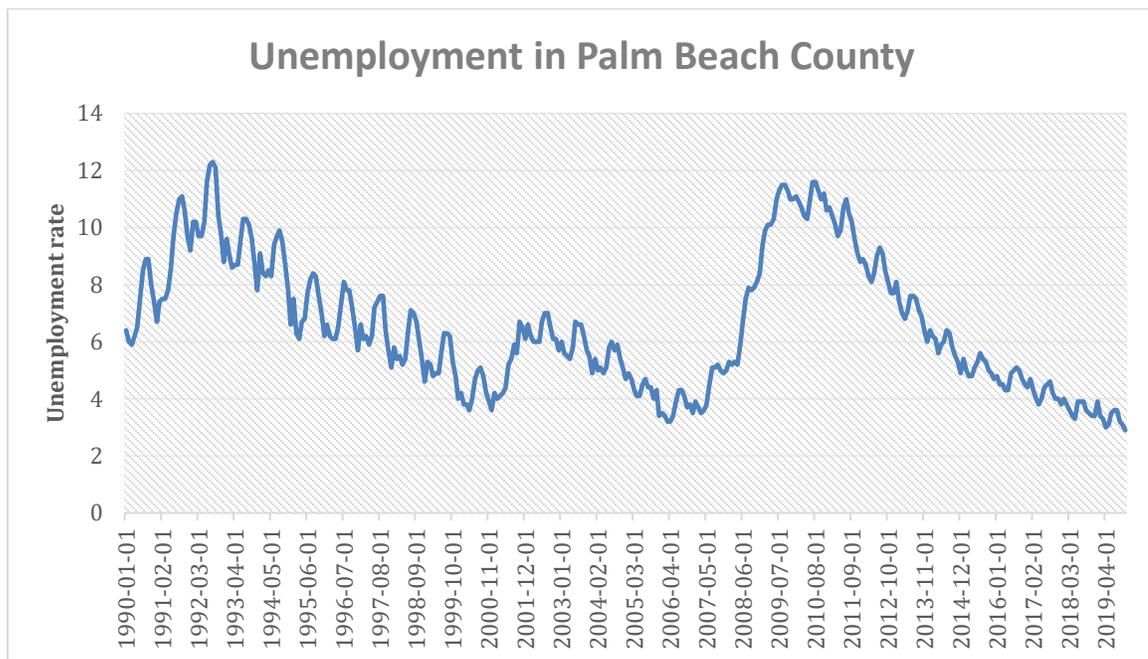


Figure 9: Unemployment over Time

Source: Federal Reserve Bank of St. Louis, Unemployment in Palm Beach Gardens as of November 2019

At the time this report was written in September 2020, infections from the novel coronavirus referred to as COVID-19 posed a significant threat to job security and employment status for residents of Palm Beach Gardens. Reacting to the virus, Florida Governor Ron DeSantis declared a Public Health Emergency on March 1, 2020 and on April 1 issued Executive Order 20-91, ordering individuals to restrict their movements and personal interactions outside of their homes.

In April, 2020, the U.S. Bureau of Labor Statistics (BLS) published an article estimating the labor market impacts of establishment shutdowns by focusing on industry sectors directly exposed to the shutdowns (Matthew Dey and Mark A. Loewenstein, "How many workers are employed in sectors directly affected by COVID-19 shutdowns, where do they work, and how much do they earn?," Monthly Labor Review, U.S. BLS, April 2020, <https://doi.org/10.21916/mlr.2020.6>). The authors used BLS data from the Quarterly Census of Employment and Wages (QCEW) and the Occupational Employment Statistics (OES) programs to estimate the number of employees working in the following 'directly exposed' industries:

1. Restaurants & Bars
2. Travel & Transportation
3. Personal Services
4. Entertainment
5. Other sensitive retail
6. Sensitive Manufacturing

The authors estimated that in the Miami-Fort Lauderdale-Pompano Beach metropolitan statistical area (MSA) in which the City of Palm Beach Gardens is included, approximately 23.9% of those employed as of June 2019 in the six identified industries were at risk from COVID-19 shutdowns. The estimates generated through this exercise are only available at the MSA.

Job Proximity Index

The HUD Job Proximity Index measures the number of jobs accessible to the number of people in an area to create a percentage index. The index estimates the degree to which residents live near employment opportunities. In Palm Beach Gardens, jobs are clustered to the east (in the denser neighborhoods towards the beach and to the far west, where fewer residents live. People who occupy the denser neighborhoods closer to the shore have better access to jobs. The Job Proximity Index in Palm Beach Gardens is much higher for all racial groups than the US average. Black/African American residents have the highest score (79.06%) and Whites have the lowest (75.67%). This difference is relatively small, and might be explained by the geographic distribution of White residents across the City.

White	Black/African American	Hispanic	Asian	Native American
75.67	79.06	77.83	76.4	78.71

Table 16: Job Proximity Index and Race
Source: HUD AFFHT0006 Raw Data Tables

The following map layers the Job Proximity Index with the number of White and minorities by census tract. The Job Proximity Index shows a high concentration of jobs in the east of the City, particularly in the south east, and in the sparsely populated census tract jutting out to the west of the PGA National Golf Club (Census Tract 78.28). The largest share of both Whites and minorities live in the job heavy east, but several tracts with large populations of minority residents to the North and West of the city have lower index values.

Palm Beach Gardens Job Proximity Index and Minorities

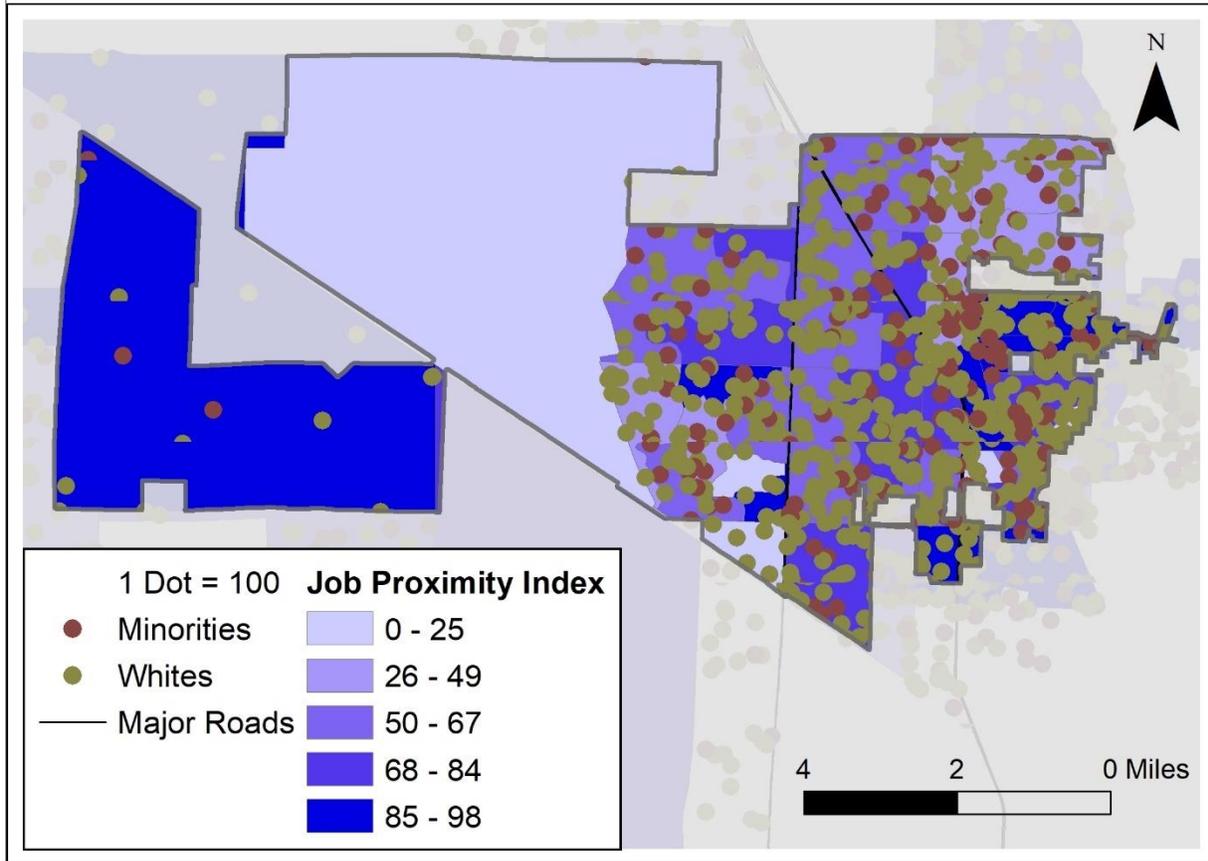


Figure 10: Job Proximity Index and Race

Source: HUD Job Proximity Index, US Census 2018 ACS 5 Year Estimates

Labor Market Engagement Index

The Labor Market Engagement Index measures disparities in access to job opportunity by combining multiple factors that could affect access, such as the unemployment rate, labor-force participation rate, and percent of the population over the age of 25 with a bachelor's degree in a census tract. A higher value indicates higher level of labor engagement. The Labor Market Engagement Index does not show dramatic disparities by race. There is less than a ten-percentage point difference between the lowest (Black/African American) and the highest (White).

White	Black/African American	Hispanic	Asian	Native American
76.63	67.60	73.63	75.79	71.99

Table 17: Labor Market Engagement Index and Race

Source: HUD AFFHT0006 Raw Data Tables

Educational Facilities, Attainment, and Proficiency

Palm Beach Gardens has a number of elementary, middle, and high schools which range from A to C ranked schools. Below is a chart of the schools in Palm Beach Gardens, their grades according to the Florida Department of Education, and their percentage of LEP and IDEA (students with disabilities) students.

School #	School Name	Grade 2019	Grade 2018	Percent of Minority Students	Percent of Economically Disadvantaged Students	LEP	IDEA
0101	ALLAMANDA ELEMENTARY SCHOOL	A	A	60.8	57.4	9.3	31.4
0111	PALM BEACH GARDENS ELEMENTARY SCHOOL	A	A	56.7	57.9	5.4	12.4
0121	HOWELL L. WATKINS MIDDLE SCHOOL	C	C	93.4	91.5	4.6	24.5
0661	MARSH POINTE ELEMENTARY	A	A	28.7	18.7	2.1	13.1
1371	PALM BEACH GARDENS HIGH SCHOOL	C	C	78.4	72.4	5.2	13.2
1971	WATSON B. DUNCAN MIDDLE SCHOOL	A	A	45.1	44.5	3.1	18.5
2011	TIMBER TRACE ELEMENTARY SCHOOL	A	A	47.3	43.5	9.8	20.2
2201	WILLIAM T. DWYER HIGH SCHOOL	B	B	54.4	48.6	0.9	14

*Table 18: Schools and School Grades in Palm Beach Gardens
Source: Florida Department of Education*

Educational attainment is high in Palm Beach Gardens, with over half of residents (50.4%) of the population over the age of 25 having a bachelor's degree or higher. Fewer than 2% of residents have completed less than 9th grade and 2.8% did not secure a high school diploma.

Educational Attainment in Palm Beach Gardens		
Population 25 years and over	44,041	--
Less than 9th grade	811	1.8%
9th to 12th grade, no diploma	1,247	2.8%
High school graduate (includes equivalency)	7,354	16.7%
Some college, no degree	8,467	19.2%
Associate's degree	3,972	9.0%
Bachelor's degree	13,412	30.5%
Graduate or professional degree	8,778	19.9%
High school graduate or higher	41,983	95.3%
Bachelor's degree or higher	22,190	50.4%

Table 19: Educational Attainment
Source: 2018 5-Year ACS S1501

Educational attainment in Palm Beach Gardens however varies by race. Among racial and ethnic groups with a significant population in the City, white residents are both more likely to have completed high school (96.4%) and college (51%). Black residents have the lowest educational attainment, with 87% of black residents completing high school and 30.4% completing a bachelor's degree. Asian residents have a lower high school completion rate (92.2%) but a higher bachelors completion rate (62.9%) than whites, while Hispanics have educational attainment rates lower than white residents but higher than Black/African American residents (91% and 47.8% respectively).

Educational Attainment by Race & Ethnicity in Palm Beach Gardens	#	%
White alone, not Hispanic or Latino	36,811	
High school graduate or higher	35,481	96.4
Bachelor's degree or higher	18,778	51
Black alone	1,639	
High school graduate or higher	1,426	87
Bachelor's degree or higher	499	30.4
American Indian or Alaska Native alone	52	
High school graduate or higher	52	100
Bachelor's degree or higher	18	34.6
Asian alone	1,645	
High school graduate or higher	1,517	92.2
Bachelor's degree or higher	1,034	62.9
Native Hawaiian and Other Pacific Islander alone	9	
High school graduate or higher	9	100
Bachelor's degree or higher	0	0
Some other race alone	261	
High school graduate or higher	238	91.2
Bachelor's degree or higher	166	63.6

Educational Attainment by Race & Ethnicity in Palm Beach Gardens	#	%
Two or more races	599	
High school graduate or higher	527	88
Bachelor's degree or higher	263	43.9
Hispanic or Latino Origin	3,387	
High school graduate or higher	3,082	91
Bachelor's degree or higher	1,619	47.8

*Table 20. Educational attainment by race/ethnicity
Source: 2018 5 Year ACS S1501*

Recognizing the importance of quality education in accessing opportunities in the labor market, HUD developed a school proficiency index to gauge the degree to which neighborhood residents anywhere in the country have access to high quality schools. Specifically, the school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the quality of the school system in a neighborhood.

The following chart provides the School Proficiency Index by race and ethnicity. School proficiency is relatively consistent across racial groups in the City, with a spread of less than 10%, with Black/African American families having the lowest score (47.54%) while Whites have the highest (56.21%).

White	Black	Hispanic	Asian	Native American
56.21	47.54	52.82	52.82	53.45

*Table 21: School Proficiency and Race
Source: HUD AFFHT0006 Raw Data Tables*

The map below shows the geographic distribution of White and minority residents layered over school proficiency. School proficiency is highest in the north of the City, with yellow census tract representing areas with very poor school proficiency, scoring below 30% of all children in the nation.

Palm Beach Gardens School Proficiency Index and Minorities

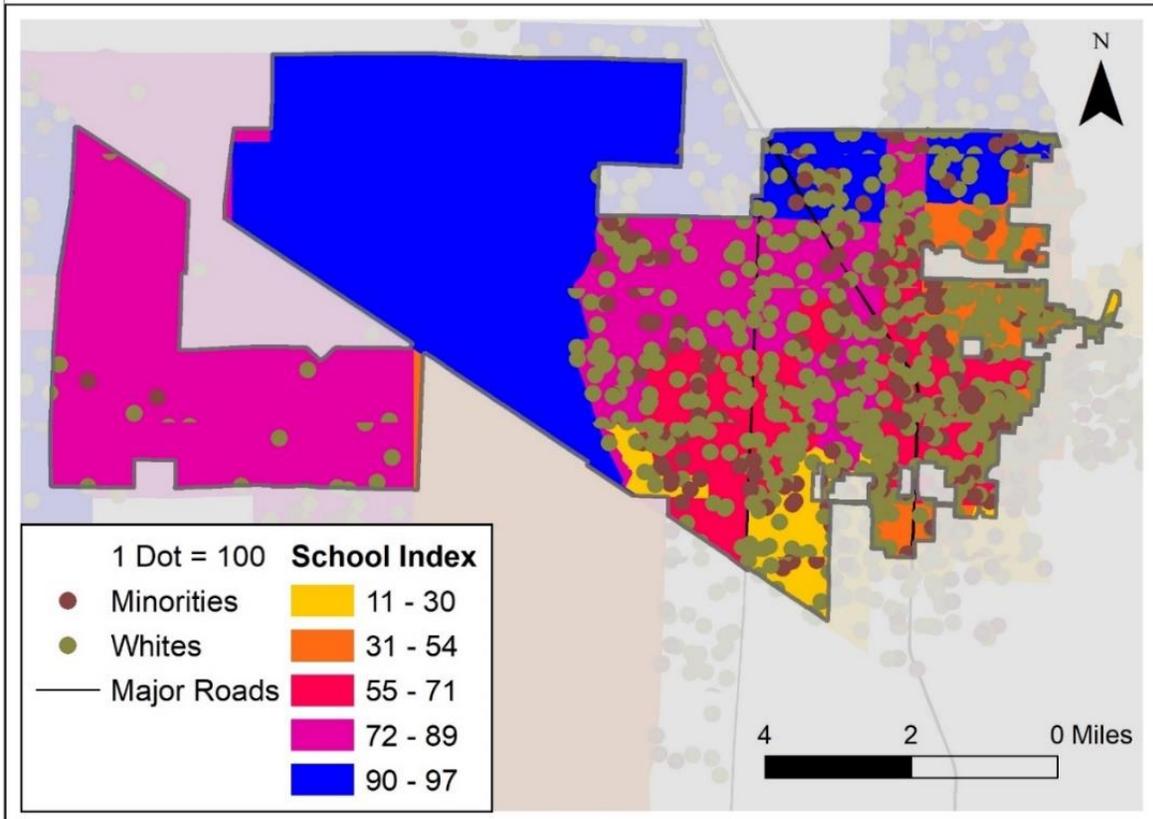


Figure 11: School Proficiency Index
 Source: HUD School Proficiency Index, US Census 2018 ACS 5 Year Estimates

Transportation

Low Transportation Cost Index

Transportation cost is often inversely related to housing affordability: areas away from town centers typically drive up transportation costs. While downtown housing might seem more expensive, the low cost of transportation can help families offset these costs. The Low Transportation Cost (LTC) index helps measure where people are able to travel easily and cheaply, thus reducing their overall housing costs. Specifically, the index is based on estimates of transportation costs for a 3-person family with income at 50% of the median income for renters for the region. Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in the neighborhood.

Transportation costs are high across the board in Palm Beach Gardens compared to the country as a whole. White and Asian residents have mildly high transportation costs, though the difference between them and the group with the best access to low cost transportation (Black/African American residents) is less than 5% points.

White	Black	Hispanic	Asian	Native American
40.99	45.79	43.91	41.5	45.20

Table 22: Low Transportation Cost Index
Source: HUD AFFHT0006 Raw Data Tables

In Palm Beach Gardens, transportation costs are high, with the most affordable scoring in the 76th percentile nation-wide. Transportation is cheaper towards the denser parts of the city to the east towards the Atlantic, and higher inland, with the census tract directly next to the Loxahatchee Sough Natural Area (Tract 78.35) scoring in the 0 percentile. Minorities are more likely to live in the City’s denser tracts in the eastern portion of the City, the same areas with lower transportation costs.

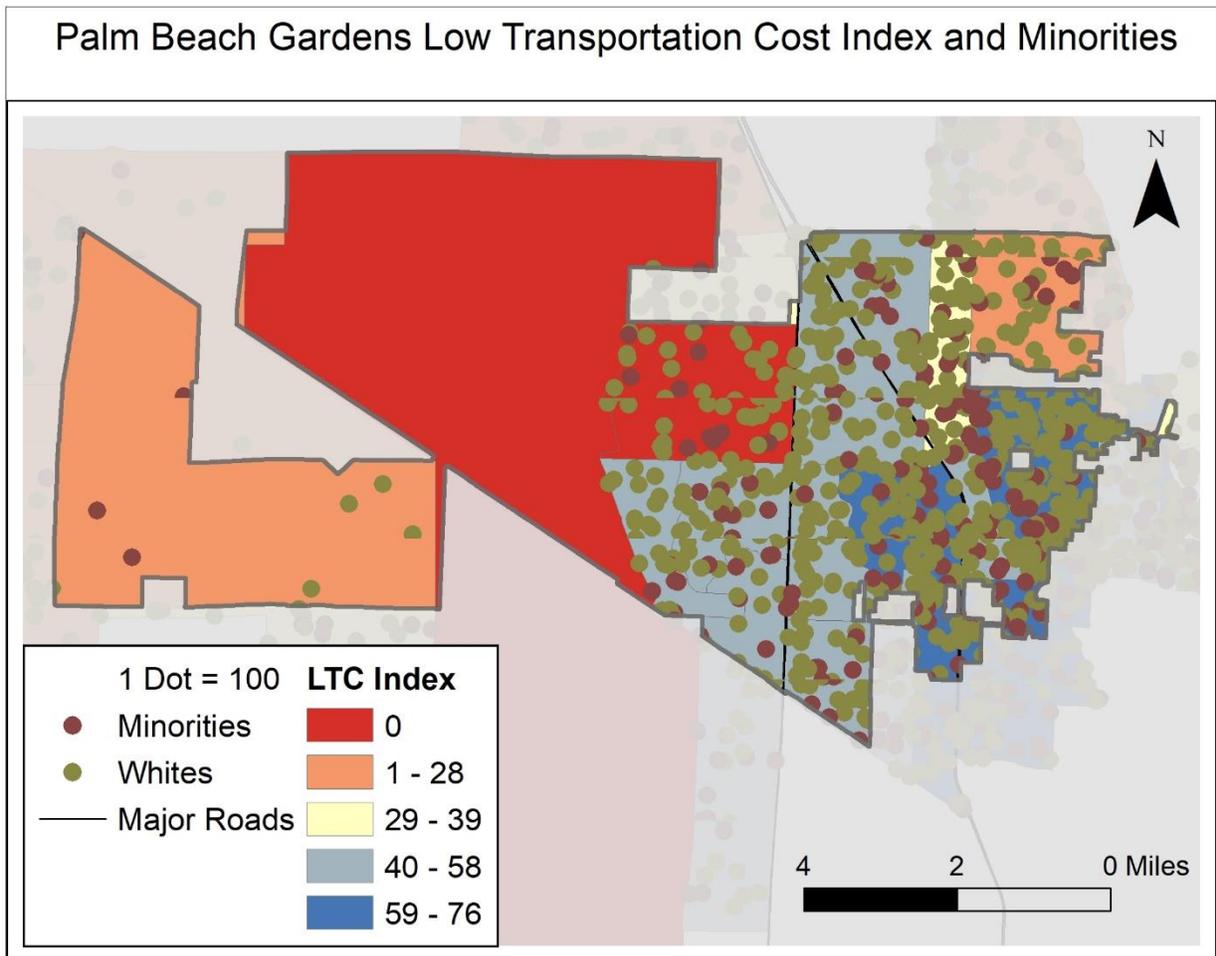


Figure 12: Low Transportation Cost Index Map
Source: HUD Low Transportation Cost Index, US Census 2018 ACS 5 Year Estimates

Commuter Mode and Commute Length

The vast majority of Palm Beach Garden’s residents commute via car, truck, or van (87%). Close to 1% take public transportation or “other means,” while a much higher share work at home (9.3%).

Palm Beach Gardens and Commute Mode		
	#	%
Car, truck, or van	22,912	87.0%
Public Transportation	293	1.1%
Taxicab	18	0.1%
Motorcycle	8	0.0%
Bicycle	75	0.3%
Walked	299	1.1%
Other means	281	1.1%
Worked at home	2,462	9.3%

Table 23: Commuter Mode

Source: 2018 ACS 5 Year Survey Table B08301

Palm Beach Gardens has a mean commute time almost identical with the country as a whole at 27.1 minutes. However, these figures disguises broad variation: 12% of the City's residents have very short commutes (less than 10 minutes) and 9.5% have very long commutes (over an hour).

Commute Time in Palm Beach Gardens	
Less than 10 minutes	13.3%
10 to 14 minutes	15.3%
15 to 19 minutes	22.6%
20 to 24 minutes	17.1%
25 to 29 minutes	8.2%
30 to 34 minutes	10.9%
35 to 44 minutes	3.2%
45 to 59 minutes	4.8%
60 or more minutes	4.7%

Table 24: Commute Time

Source: 2018 ACS 5 Year Survey Table B08301

Public Transportation Network

Palm Beach Gardens is part of the Palm Beach County public transportation network, Palm Tran. The City is served by the 1, 3, 10, 21, and 33 bus lines, with a major interchange at the Gardens' Mall. The figure below shows Palm Tran service corridors in the City of Palm Beach Gardens. Public transit accessibility is important for low income households who may not be able to afford to own a car and older adults and people with disabilities who may not legally be able to drive.

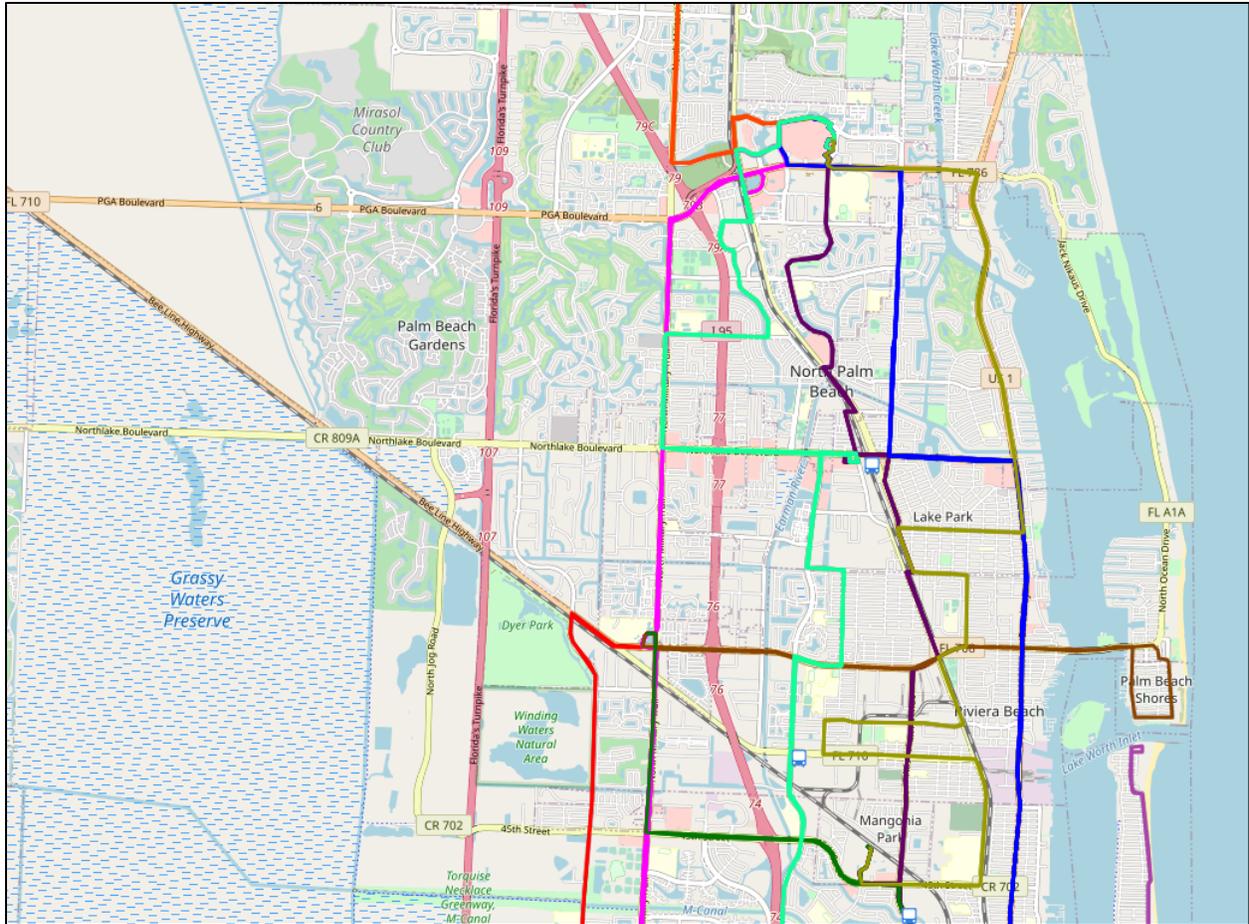


Figure 13: Palm Tran Bus Routes, Local Focus
 Source: Palm Tran

H+T Index

The Housing + Transportation (H+T) Index is a measurement created by the Center for Neighborhood Technology created to chart the way that housing costs and transportation costs together affect the ability for families to afford to live places. For a family at 80% of AMI, families should be paying no more than 45% of their income towards combined housing plus transportation. Unfortunately, the lowest H+T index by census tract in Palm Beach Gardens (excluding unoccupied tracts that register as 0 or 1) is 58%. This indicates that almost everywhere across Palm Beach Gardens, households are paying too much for housing and transportation combined. In several areas in the City with higher housing costs, a family with the median income would pay as much as 128% of their income just for housing and transportation. Minority residents in Palm Beach Gardens live in the denser, more urban areas in the eastern portion of the City and so have lower combined costs of housing and transportation.

Palm Beach Gardens H+T Index and Minorities

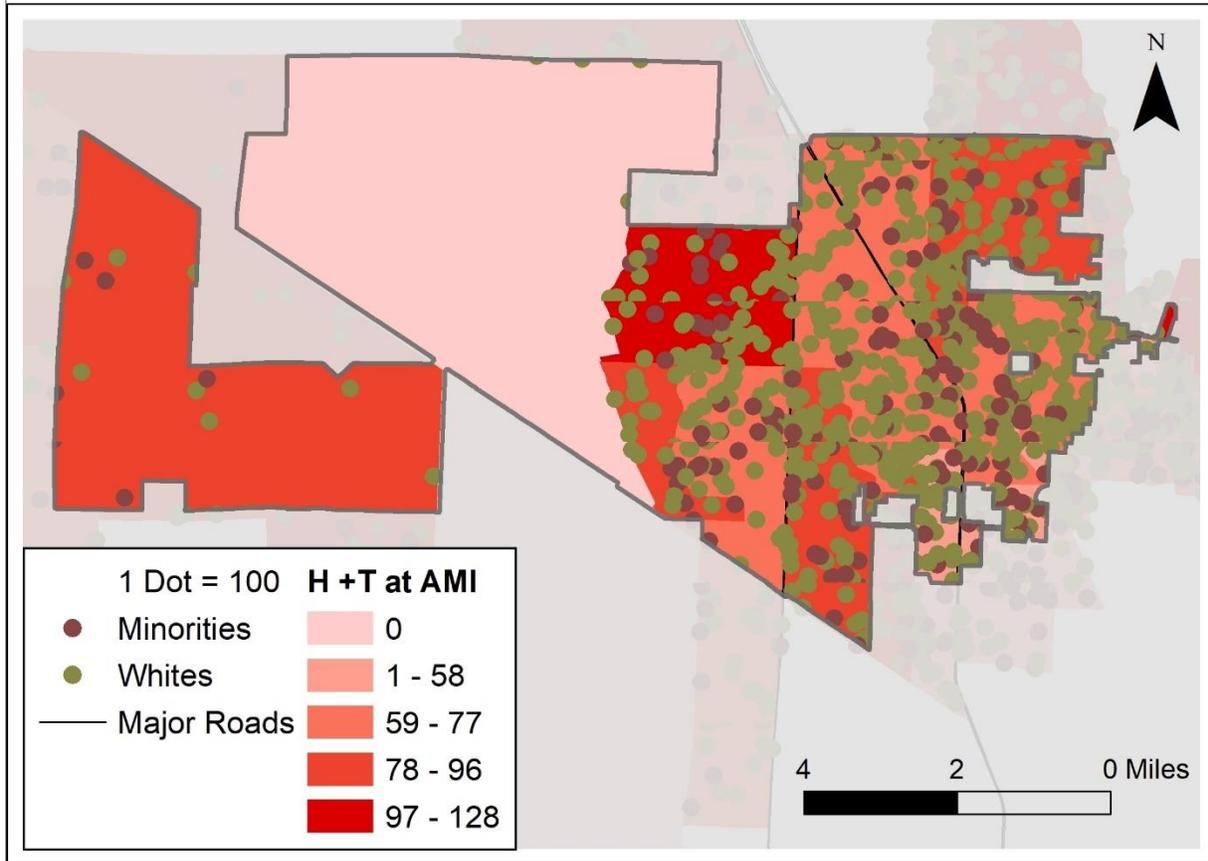


Figure 14: H+T Index

Source: CNT H+T Index, US Census 2018 ACS 5 Year Estimates

Housing Data

The section below details information on the types and cost of housing in Palm Beach Gardens. It starts by providing a general overview of the types of housing available, vacancy rates, and the number of owners versus renters. It then moves to housing affordability, comparing housing costs to wages to show the need for affordable housing. Finally, it discusses publicly supported housing and homeownership.

Before beginning, it is important to detail the direct connection between housing affordability and the ability for protected classes under the FHA to enjoy equal access to housing. Across the United States, and in Palm Beach Gardens, persons of color are disproportionately housing cost burdened, meaning their housing costs are more than 30% of their household's gross income. This fact is based on a complex dynamic between multiple factors, including lower household incomes for persons of color compared to Whites and generalized housing market discrimination. Due to this fact, a community's housing supply, and the efforts it takes to develop, incentivize, and otherwise promote affordable housing, can either support or hinder fair housing. Depending on local statistics, addressing housing affordability can be a primary means by which a jurisdiction can affirmatively further fair housing.

Occupancy by Tenure and Vacancy

Two of the most fundamental data points when it comes to housing are vacancy and tenure: how many homes are empty and how many people rent vs. own their own home. Renters tend to pay more money for housing while making less and are more likely to face housing discrimination, through their landlord or property management company. Palm Beach Gardens has a small number of renter households, certainly when compared to renter household shares seen in similar sized cities in Florida.

There are 17,243 owner occupied units in the City with a similar number with a mortgage (9,356, 54%) as without (7,887, 46%). Only 28% of households in Palm Beach Gardens are renters, meaning that while renters disproportionately suffer cost burden and overcrowding, there are far more homeowners with these housing problems. There are 5,959 vacant units in Palm Beach Gardens. While the vacancy rate is far higher for rental units (8.8%) than homeowner units (2.3%), because there are far more homeowner units than rental units there are still more unoccupied homeowner units.

The U.S. Census Bureau’s definition of housing unit vacancy is important to consider when reviewing the data in this section. The Census states that:

A housing unit is vacant if no one is living in it at the time of the interview, unless its occupants are only temporarily absent. In addition, a vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere. New units not yet occupied are classified as vacant housing units if construction has reached a point where all exterior windows and doors are installed and final usable floors are in place. Vacant units are excluded if they are exposed to the elements, that is, if the roof, walls, windows, or doors no longer protect the interior from the elements, or if there is positive evidence (such as a sign on the house or block) that the unit is to be demolished or is condemned (*U.S. Census Bureau, HVS Definitions and Explanations, Vacant Housing Units*).

It is important to note that this vacancy definition includes seasonal homes. In Florida, many homes are seasonally vacant but relatively well-maintained. While these seasonal homes may not be blighted or a public health danger, for the purposes of housing a community’s year-round residents the units are effectively removed from the available housing stock.

Housing Units and Occupancy in Palm Beach Gardens	
Total housing units	30,049
Occupied housing units	24,090
Vacant housing units	5,959
Homeowner vacancy rate	2.3%
Rental vacancy rate	8.8%
Owner-occupied units	17,243
Housing units with a mortgage	9,356
Housing units without a mortgage	7,887
Occupied units paying rent	6,671

Table 25: Tenure and Occupancy
Source: 2018 5 Year ACS

The following map displays renters by census tract, with renters overwhelmingly concentrated in a few census tracts to the east of the city.

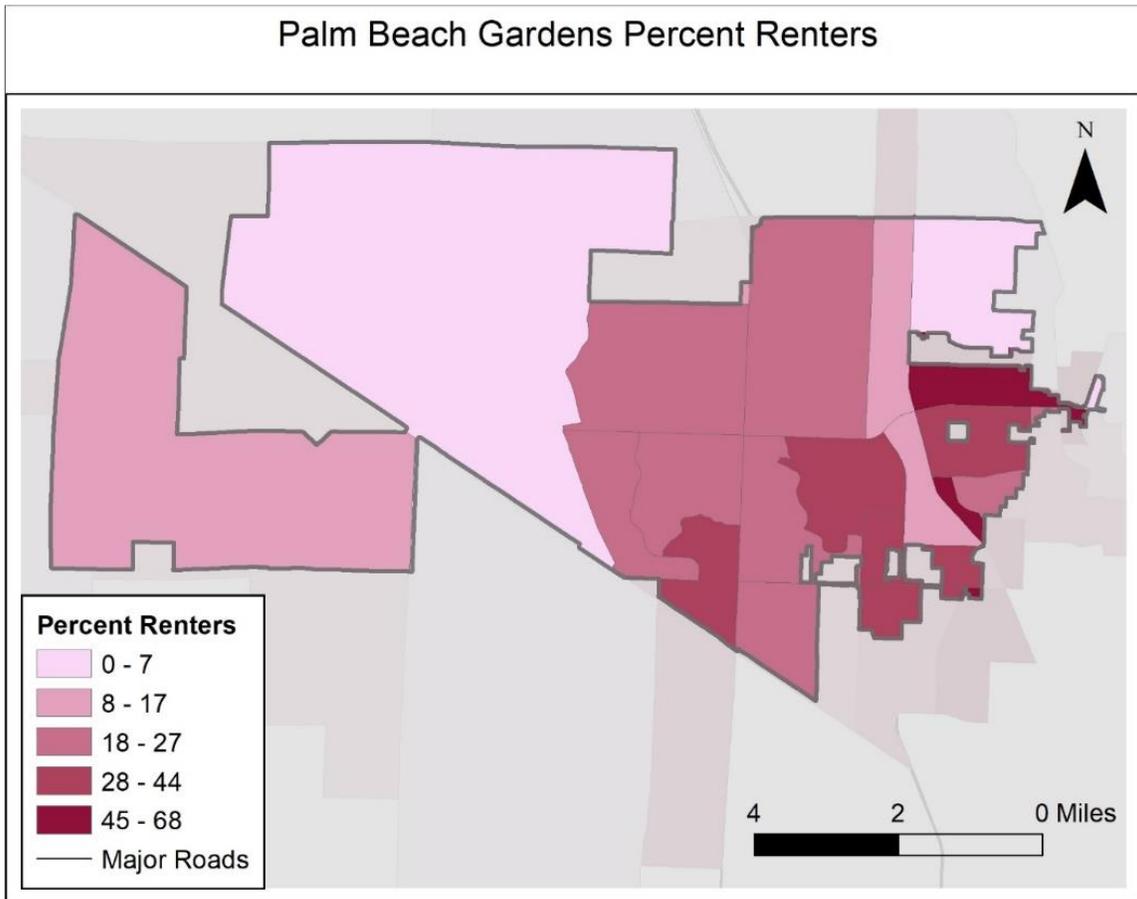


Figure 15: Percent Renters
Source: US Census 2018 ACS 5 Year Estimates

Housing Types

Palm Beach Gardens has a mix of housing types. While single family, detached units represent a plurality of housing in the city (46.2%), there are a substantial number of 1-unit, attached homes or townhomes, as well as small condominiums, duplexes, and triplexes. A mixture of housing types allows people to find the home that is the right size and fit for them and contributes to better economic integration.

Types of Housing in Palm Beach Gardens		
	#	%
Total housing units	30,049	
1-unit, detached	13,877	46.2%
1-unit, attached	5,377	17.9%
2 units	762	2.5%
3 or 4 units	3,110	10.3%
5 to 9 units	1,866	6.2%
10 to 19 units	2,269	7.6%
20 or more units	2,402	8.0%
Mobile home	374	1.2%
Boat, RV, van, etc.	12	0.0%

Table 26: Housing Type

Source: 2018 5 Year ACS Estimate Table DP04

Another important data table for understanding housing affordability is the size of housing available in Palm Beach Gardens. Palm Beach Gardens has a small number of units with zero bedrooms (141) and 1-bedrooms (1,495). Approximately 71% of owner-occupied units have three or more bedrooms. Large homes tend to cost more and drive up housing costs. While many households prefer larger homes, when zoning regulations require the development of larger homes, families may be forced to pay for more home than they can afford.

	Owners		Renters	
	#	%	#	%
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: Number of Bedrooms

Source: 2018 5 Year ACS Estimate Table DP04

Age of Housing Stock

The vast majority of homes in Palm Beach Gardens were built between 1980 and 2009. Older homes tend to be more affordable, so this relatively new housing stock might suggest an expensive market. Positively, newer homes are less likely to have the serious housing issues like a lack of facilities or a damaged roof and are less likely to have the presence of lead-based paint which is a potential health risk for children occupying units built prior to 1980.

Year Built	# of units
Total housing units	30,049
Built 2014 or later	474

Year Built	# of units
Built 2010 to 2013	598
Built 2000 to 2009	9,238
Built 1990 to 1999	6,920
Built 1980 to 1989	7,150
Built 1970 to 1979	3,250
Built 1960 to 1969	2,160
Built 1950 to 1959	165
Built 1940 to 1949	56
Built 1939 or earlier	38

Table 28: Age of Housing Stock

Source: 2018 5 Year ACS Estimate Table DP04

Owner-occupied units by Race/Ethnicity

White, non-Hispanic residents in Palm Beach Gardens represent a disproportionate number of owner-occupied housing units in Palm Beach Gardens, that is while they represent under 80% of residents, they own 86.8% of all owner-occupied homes. Black/African American and Hispanic residents are less likely to own a home in Palm Beach Gardens.

Owner-occupied housing units by race/ethnicity in Palm Beach Gardens		
	#	%
Occupied housing units	24,090	100%
White	22,335	92.7%
Black or African American	665	2.8%
American Indian and Alaska Native	18	0.1%
Asian	675	2.8%
Native Hawaiian and Other Pacific Islander	0	0%
Some other race	89	0.4%
Two or more races	308	1.3%
Hispanic or Latino origin	1,581	6.6%
White alone, not Hispanic or Latino	20,913	86.8%

Table 29: Owner Occupied by Race

Source: 2018 5 Year ACS Estimate Table DP04

Cost of Housing

Since 2010, the median home value in Palm Beach Gardens has decreased by 2.7%, while the median rent has increased by 24.6%. This decrease in home value has reduced homeowner wealth, while rental costs have gone up, hurting renters. However, between 2018 and 2020, Zillow's Housing Value Index shows a rapid increase of housing to above 2010 levels (\$398,000).

	Base Year: 2010	Most Recent Year: 2018	% Change
Median Home Value	\$354,600	\$345,000	-2.7%
Median Contract Rent	\$1,315	\$1,638	24.6%

Table 30: Cost of Housing

Source: 2006-2010 ACS (Base Year), 2014-2018 ACS

The price cohort with the greatest number of units in Palm Beach Gardens is between \$1,500 and \$1,999 (39%), followed by rental units costing between \$1,000-\$1,499 per month (35.7%). This accounts for over 70% of the rental units in the City, with only 3.5% of residents paying the \$500-\$999 affordable to lower income families and relatively few households paying more than \$2,000.

Occupied units paying rent in Palm Beach Gardens		
Total	6,671	100%
Less than \$500	0	0%
\$500 to \$999	233	3.5%
\$1,000 to \$1,499	2,381	35.7%
\$1,500 to \$1,999	2,605	39%
\$2,000 to \$2,499	600	9%
\$2,500 to \$2,999	427	6.4%
\$3,000 or more	425	6.4%

Table 31: Rent Paid

Source: 2018 5 Year ACS Estimate Table DP04

FMR and HOME Rents

The table below provides the HUD fair market rent (FMR) and HOME (HUD's HOME Investment Partnerships program) rent limits for 2020. Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases. The fair market rent in the city is \$1,015 for an efficiency unit, but over double (\$2,043) for the more common three-bedroom units. High rent may be driven not just by demand but by a lack of lower cost housing styles, like one- and two-bedroom units.

Monthly Rent (\$)					
	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,015	1,208	1,506	2,043	2,422
High HOME Rent	979	1,050	1,262	1,450	1,598
Low HOME Rent	768	823	988	1,141	1,273

Table 32: Fair Market and HOME Rents

Source: HUD FMR and HOME Rates

Housing Cost Burden by Race/Ethnicity

A review of housing data provided by HUD provides information that can be analyzed and used to determine whether racial or ethnic groups have a disproportionate housing need relative to other races/ethnicities in the City. HUD has determined that a disproportionately higher need exists when the share of persons in a given category is at least 10% higher than the share of persons in the category as a whole.

In Palm Beach Gardens, the majority of white, Asian, and Hispanic residents are not cost burdened, while the majority of Black/African American residents are cost burdened. A disproportionately higher need exists for Black/African American residents.

Housing Cost Burden in Palm Beach Gardens				
	<=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 33: Race and Cost Burden

Source: 2011-2015 CHAS Data

Housing Affordability

Throughout the City, there are limited housing options affordable to low-income residents, particularly for owner-occupied housing. There are approximately 3,403 units affordable to a low-income household (80% AMI or below), with a combined 1,310 rental units and 2,093 homeowner units affordable to those

households. With 5,975 cost burdened households making 80% of AMI, there are almost double the number of cost-burdened low-income households as there are affordable units.

% units affordable to households		
	Renter	Owner
30% HUD Adjusted Median Family Income (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 34: Units Affordable
Source: 2011-2015 CHAS Data

Housing Needs & Problems

The table below gives an overview of housing problems in the City. Using 2015 CHAS data, it provides the numbers of households experiencing each category of housing problem by income ranges (up to 100% AMI) and tenure status. Housing problems are typically experienced at disproportionate rates by the lowest income households in a jurisdiction.

Severe housing cost burden (where a household is paying more than 50% of their income towards housing) is the largest housing problem in Palm Beach Gardens, with 3,705 households paying more than 50% of their income towards housing. This is concentrated among extremely and very low-income households regardless of tenure. Relatively few households in Palm Beach Gardens have other housing problems, with only 160 households lacking a complete plumbing or kitchen facility and only 162 overcrowded.

	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	0	30	29	0	59	0	4	75	24	103

	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
(and none of the above problems)										
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
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 35: Housing Problems
Source: 2011-2015 CHAS Data*

Cost Burden by Tenure Status and Family Type

The table below shows cost burdened households by family composition and tenure status. A cost burdened household is one in which 30% or more of their income goes to housing costs. Overall, renters are proportionally more likely than homeowners to face housing cost burden, but because renters represent only a small portion of the City's population, there are more homeowners who are cost burdened. According to the 2011-2015 CHAS data, there are 2,129 cost burdened renters and 2,914 cost burdened owners earning between 0% and 80% AMI. While the majority of cost burdened households are not elderly, for people making between 0%-30% AMI elderly headed households represent the largest plurality and almost 50% of all cost burdened households. These low-income elderly households are of special concern because they are often on a fixed income, more likely to be disabled, and less likely to be able to work.

Cost Burden in Palm Beach Gardens	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 36: Cost Burden by Family Type and Income
Source: 2011-2015 CHAS Data

Severe cost burden measures a more extreme level of housing unaffordability, where households pay more than 50% of their income towards housing. As noted in the housing problems table above, severe cost burden is more common in Palm Beach Gardens than moderate cost burden (between 30% and 50% of a household's income spent on housing), suggesting a high degree of income inequality.

Severe Cost Burden	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 37: Severe Cost Burden
Source: 2011-2015 CHAS Data

Housing Problems by Race/Ethnicity

The next four charts show the number of households by income level that do or do not have one of the four main housing problems by race/ethnicity. The four housing problems monitored by the ACS are lacking complete plumbing, housing cost burden, overcrowding, and lacking complete kitchen facilities.

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

Note: 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%.

Table 38: Extremely Low-Income Cost Burden

Source: 2011-2015 CHAS

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

Note: 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%.

Table 39: Very Low-Income Cost Burden

Source: 2011-2015 CHAS

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

Note: 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%.

Table 40: Low Income Cost Burden
Source: 2011-2015 CHAS

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

Note: 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%.

Table 41: Moderate Income Cost Burden
Source: 2011-2015 CHAS

In Palm Beach Gardens, 94.7% of extremely low-income households have at least one housing problem. While the percentage of very low (79.7%), low (61.1%) and moderate (52.1%) goes down as incomes increase, the vast majority of all households making less than the area median income and a majority in all low-income households have housing problems.

Blacks/African Americans have a lower instance of housing problems in the extremely low-income category than white Americans, but with only 75 households this number may not be meaningful. As incomes rise, white households track with overall housing problems, while Blacks/African Americans and Hispanics are more likely to experience at least one housing problem in the very low, low, and moderate-income categories.

Publicly Supported Households

Affordable housing units should be spread across a city in order to reduce economic and racial segregation and give lower income people access to high quality schools and job opportunities. While there are a variety of ways to make housing affordable, one of the most common is publicly supported housing. According to HUD, Palm Beach Gardens has no publicly supported housing in the City, though there are several developments just outside City bounds. This hinders low-income families in securing affordable, high-quality housing in Palm Beach Gardens, and is an impediment to fair housing choice.

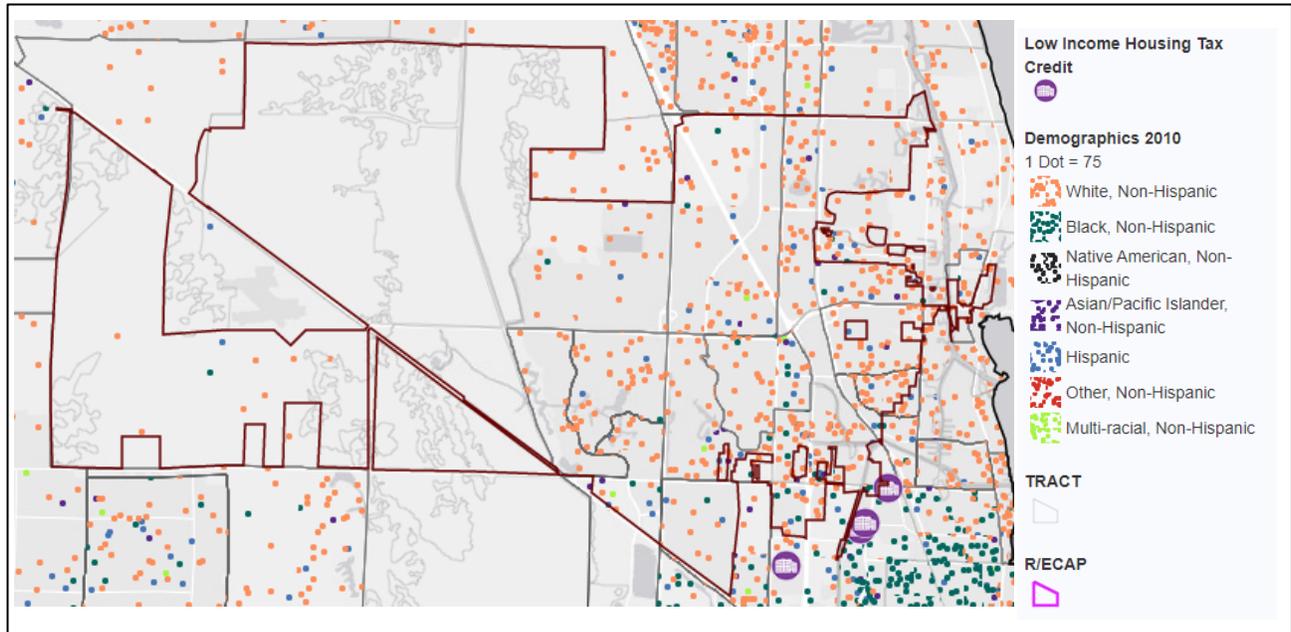


Figure 16: Publicly Supported Housing
Source: HUD AFFH Mapping Tool, [2017] [map 5]

Evaluation of Jurisdiction's Current Fair Housing Legal Status

This section provides information on the City of Palm Beach Gardens' current fair housing legal status including information about the number and type of fair housing complaints, the existence of fair housing discrimination suits filed by the U.S. Department of Justice, as well as a discussion of other fair housing concerns or problems.

The federal Fair Housing Act is administered and enforced by HUD's Department of Fair Housing and Equal Opportunity (FHEO) and the Department of Justice's Housing and Civil Enforcement Section. The FHEO also administers the Fair Housing Assistance Program (FHAP) and the Fair Housing Initiative Program (FHIP). These programs provide funding to States, local public agencies, and non-profit organizations to assist victims of housing discrimination and to promote awareness of fair housing laws.

In addition to the federal Fair Housing Act, the State of Florida has adopted a state fair housing law enforced by the Florida Commission on Human Relations (FCHR). Title XLIV, Chapter 760 of the Florida Statutes, "Civil Rights," covers discrimination in the treatment of persons and minority representation. Part II, the Florida Fair Housing Act (ss. 760.20 – 760.37), prohibits discrimination in the sale, rental, advertising, financing, or provision of brokerage services for housing. The Florida Fair Housing Act is substantially equivalent to the federal Fair Housing Act and protects persons from housing discrimination on the bases of race, color, religion, national origin, sex, pregnancy, disability, and familial status. In 2000, the Florida Fair Housing Act (FFHA) was amended to include affordable housing residence as a protected class (Section 760.26, Florida Statutes). In addition to federal and state protections for the protected classes, the Palm Beach County fair housing ordinance (Palm Beach County code of ordinances, Volume I, Chapter 15, Article 3 Housing, Places of Public Accommodation) offers protections to additional classes. The Palm Beach County ordinance protects all of the following classes: race, sex, color, religion, national origin, disability, familial status, sexual orientation, age, marital status, or gender identity or expression.

In the City of Palm Beach Gardens and surrounding region there are three main fair housing agencies that enforce fair housing laws and provide fair housing outreach and education services at the local level. Those agencies are: 1) the Fair Housing Center of the Greater Palm Beaches (FHC), 2) the Legal Aid Society of Palm Beach County, Inc. (LASPBC), and 3) the Palm Beach County Office of Equal Opportunity (OEO).

The FHC's mission is to ensure equal and affordable housing opportunities for all people, by promoting culturally diverse communities through open housing and the elimination of all barriers to that goal. The FHC accomplishes this mission as a full service, community-based fair housing agency and provides comprehensive fair housing services to residents throughout the state.

The LASPBC is committed to providing high quality civil legal advice, representation and education to the disadvantaged of Palm Beach County in order to protect their personal safety, enhance their opportunities and living conditions, and promote self-sufficiency. Among its many services, LASPBC advances fair housing rights by offering education and representation for those at risk for housing discrimination.

The Palm Beach County OEO's mission is to promote a discrimination free quality of life for Palm Beach County residents through educating and advocating a policy of nondiscrimination and enforcing local, state and federal civil rights laws. OEO is responsible for investigating and resolving complaints of discrimination in employment, housing and public accommodations on the basis of race, sex, color,

religion, national origin, disability, age, sexual orientation, marital status or familial status and gender identity or expression. Additionally, OEO provides human relations training and referral services. OEO is a federally recognized equivalent agency under the federal civil rights laws - Title VII (employment discrimination cases) and Title VIII (fair housing cases).

Fair Housing Complaints or Compliance Reviews

A review of fair housing complaint data helps identify trends in housing discrimination in the City to inform specific fair housing actions that may be needed to address the cause of any trends. As summarized in the table below, between 2015 and 2020, 4 fair housing cases were filed in the City of Palm Beach Gardens based on statistics provided by HUD and FCHR. Compared to jurisdictions in Florida with similar populations, this is a low number of fair housing discrimination complaints.

Basis	2015	2016	2017	2018	2019	2020*	Total
Race	1						1
Disability	1		1		1		3
Familial Status							
Sex							
National Origin							
Color							
Religion							
Retaliation							
Total							
*	From January 1 through July, 2020						

*Table 42. Basis for Housing Discrimination Cases in City of Palm Beach Gardens, 2015-2020.
Source: FCHR; HUD FHEO Region IV*

In addition to review of the basis for housing discrimination complaints, it is also valuable to examine the disposition of cases. The 4 cases reviewed were resolved in the following ways:

- Conciliation/settlement successful; 1 case
- No cause determination; 2 cases
- Unresolved, 1 case

Cases that were found to have no cause may indicate an individual's lack of awareness about their rights under fair housing laws. This may also contribute to the under-reporting of discrimination and supports the need for additional fair housing education.

Fair Housing Discrimination Suits Filed by Department of Justice

There is no unresolved letter of finding issued by or lawsuits filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law against the City. There is also no claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Reasons for any Trends or Patterns

The National Fair Housing Alliance states in its 2019 Fair Housing Trends Report that a majority of discrimination complaints at the national level based on disability can be partially attributed to the fact that disability cases are often more overt and more easily detected than other types of housing discrimination. Disability complaints usually involve denial of a request for a reasonable modification or accommodation or involve a multi-family property that is not accessible in obvious ways.

Identification of Impediments to Fair Housing Choice

Public Sector

This section of the AI examines public policies of the jurisdiction and seeks to identify impediments to fair housing choice.

Zoning and Site Selection

Land use and zoning laws can be a significant contributing factor to segregation. This section of the AI examines public policies of the City and seeks to identify impediments to fair housing choice. The local government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that can be constructed, the density of housing, and various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. The local policies, therefore, determine if fair housing is to be promoted or passively tolerated.

The majority of Palm Beach Gardens' residential zones have relatively restrictive density requirements that may artificially restrict the supply of housing and drive up housing costs. The majority of the city's residential land area is zoned "agricultural estates" and "agricultural residential," which limit development to 1 unit per 5 acres and 1 unit per 2.5 acres respectively. The highest density residential zone, "residential high-density district" only allows 10 units per acre, while Planned Unit Development (PUD) areas have maximum densities of 12 units per acre, still under the 16 to 35 units per acre generally classified as "missing middle housing." The city allows relatively low area coverage (even in the highest density zone, only 35% of a lot can be developed), and, in all of zones besides high density, long setbacks.

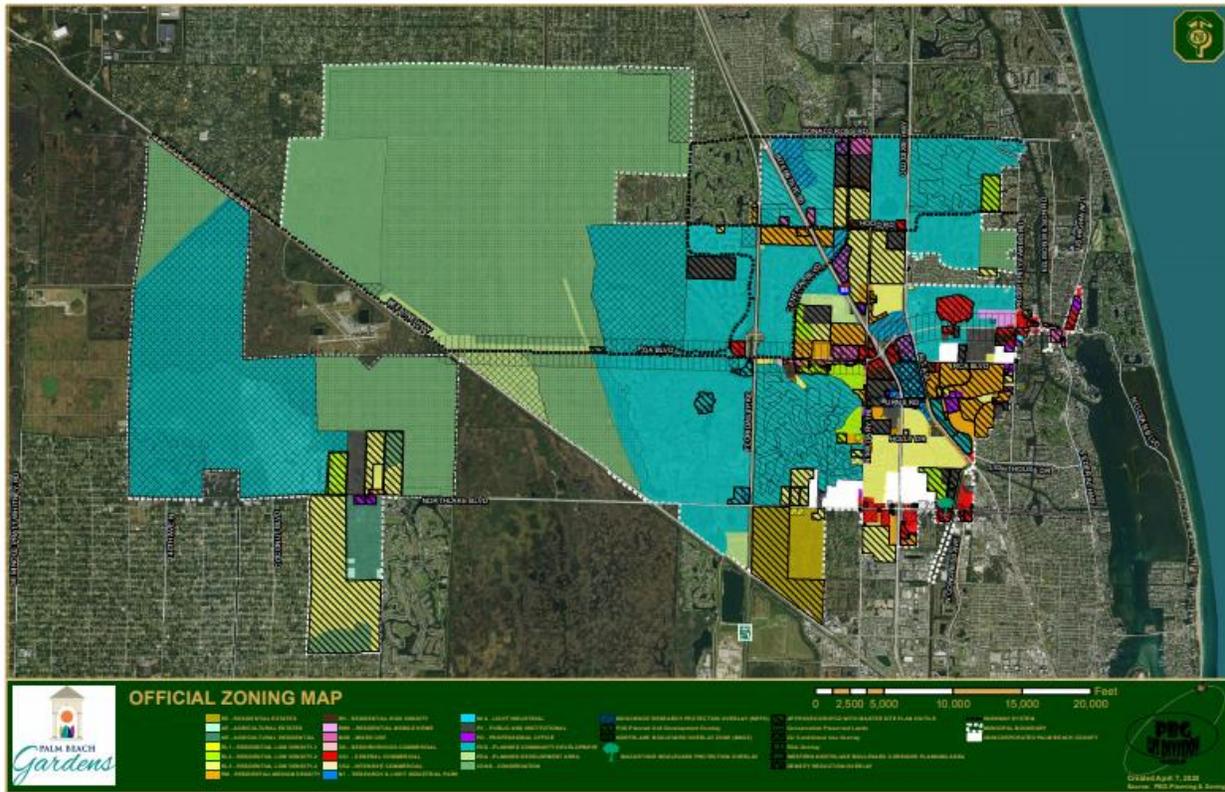


Figure 17. Official Zoning Map, City of Palm Beach Gardens.
 Source: Department of Planning & Zoning, City of Palm Beach Gardens.

The zoning code makes no mention of accessory dwelling units (ADUs), smaller units built on the lot of a single-family home, that are an important market-based solution to housing affordability. However, the Housing Element of the 2017 Palm Beach Gardens’ Comprehensive Plan calls for the city to allow ADUs to improve senior housing.

The City includes the following goals and objectives on housing affordability in its 2017 Comprehensive Plan:

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.

Additionally, incentives adopted by the City of Palm Beach Gardens further encourage affordable housing development through the following:

- Targeted Expedited Permitting Program (TEPP) to expedite the permitting process.
- Density Bonus for Low, Medium and High-Density Residential land use categories.
- Traffic Performance Standards mitigation consistent with the Palm Beach County Workforce Program.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

Palm Beach Gardens does not have its own public housing authority but is under the Palm Beach County Housing Authority (PBCHA), which exclusively administers housing choice vouchers. The PHA manages 3,241 housing vouchers.

Palm Beach County Vouchers							
Certificate	Public Housing	Total	Project-Based	Tenant Based	Special Purpose Vouchers		
					Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
2,813	428	3,241	420	2,257	0	0	163

Table 43: Public Housing Numbers

PBCHA policy permits administration of targeted funding/selection based upon the following criteria and point values:

1. Homeless - 2 Points
2. Working - 2 Points
3. Involuntary Displacement - 1 Point
4. Veterans, Disabled, Victims of Domestic Violence - 1 Point

The Housing Authority follows best practices regarding (1) management of waiting lists by offering applicants to check their wait list status by phone; (2) purging of waiting lists every year; and (3) establishing clear criteria for initial eligibility and subsequent selection of applicants from the existing waiting lists.

Policy evaluation for the PBCHA revealed that the agency adheres to HUD requirements and follows best practice models pertaining to its Non-Discrimination policy contained within its Tenant Selection Policy.

Sale of Subsidized Housing and Possible Displacement

The Fair Housing Planning Guide published by HUD advises that jurisdictions should review any threat to possible displacement of low-income families as a result of the sale of public housing. There are no public housing properties located within the boundaries of the City of Palm Beach Gardens, nor are there subsidized properties (subsidized by the low-income housing tax credit, for instance) within the boundaries of the City. For this reason, the sale of subsidized housing and resulting threat of displacement is not a consideration for this analysis.

Property Tax Policies

Property tax policies allow for accessibility for a significant number of protected classes to allow for greater affordability and accessibility of housing choice. The Palm Beach Property Appraiser offers the following exemptions for protected class members.

- Limited Income Senior Citizen Exemption for Persons 65 and Older-\$25,000
- Widow/Widower Exemption-\$500
- Civilian Disability: Total and Permanent Disability, Quadriplegic, Legally Blind- Totally Exempt
- Living Quarters of Parents or Grandparents Exemption-Taxes associated with ADU or ‘granny flat’ totally exempt
- Disabled Veteran Exemption -\$5,000
- Active Duty Military Exemption- Total for every day on qualified deployment
- Surviving Spouse of Military Veteran who Died in the Line of Duty-Total
- Disabled Law Enforcement and First Responder Exemption-Total

Building Codes (Accessibility)

An important way that state and local governments impact fair housing choice for persons with disabilities is through the building and construction codes adopted and enforced in their jurisdictions. While federal housing discrimination laws impose design and building accessibility standards for certain housing and public facilities, Congress and HUD place the direct responsibility of meeting those federal standards on

the architects/designers, builders, and operators of the covered accommodations, and do not require or authorize local government authorities to interpret or enforce federal accessibility requirements. There is no plan review or permitting process under the FHA or Americans with Disabilities Act (ADA). Indeed, under these laws, a building permit or certificate of occupancy from a local government does not shield a builder from enforcement action by HUD or the DOJ or from liability in a private civil action. Rather, local building departments and inspectors only enforce state and local accessibility codes or laws. However, by incorporating the federal standards into the state and local codes, state and local governments can ensure another level of oversight and protection of the unique housing needs faced by persons with disabilities. All construction in the City of Palm Beach Gardens shall be in accordance with the Florida Building Code, Florida Fire Prevention Code, and the 2015 International Property Maintenance Code as amended. The Florida Building Code includes the primary guidance containing scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements. The 1993 Florida Legislature enacted the "Florida Americans with Disability Accessibility Implementation Act" which incorporated the architectural accessibility requirements of the Americans with Disabilities Act of 1990 into Florida law and maintained existing provisions of Florida law thought to be more stringent than the ADA accessibility guidelines. In 1997 the legislature amended the Act to address U.S. Department of Justice (DOJ) concerns with Florida requirements, which might not have been equivalent or more stringent than ADA architectural standards, to obtain federal certification of Florida's building code as substantially equivalent to the Federal ADA Standards for Accessible Design as adopted by the Department of Justice (DOJ) in 28 CFR 36.

As a recipient of federal funds, Palm Beach Gardens is obligated to comply with the Fair Housing Act (FHA) and the Fair Housing Amendments Act, which expanded the FHA and established terms to enforce harsher penalties for those who sell or rent property and discriminate against persons with disabilities. Multifamily housing units covered by the FHA's accessibility requirements are those located in a building of four or more units, built for first occupancy after March 13, 1991, and includes both privately owned and publicly assisted housing rental units and for sale units. It includes not just apartments and condominiums but also assisted living facilities, continuing care facilities, nursing homes, public housing developments, HOPE VI projects, projects funded with HOME or other federal funds, transitional housing, single room occupancy units (SROs), shelters designed as a residence for homeless persons, dormitories, hospices, extended stay or residential hotels, and more. When an addition is built onto an existing building, the addition of four or more units is regarded as a new building and must meet the design requirements. If any new public and common use spaces are added, they are required to be accessible. In buildings with four or more dwelling units and at least one elevator, all dwelling units and all public and common use areas are subject to the Act's design and construction requirements. In buildings with four or more dwelling units and no elevator, all ground floor units and public and common use areas are subject to the Act's design and construction requirements.

Palm Beach Gardens is obligated to comply with additional laws due to receipt of federal assistance including Section 504 of the Rehabilitation Act of 1973 (which applies to programs and activities receiving federal funds), Titles II and III of the Americans with Disabilities Act (ADA) (which apply to programs, services, and activities provided or made available by public entities and to public accommodations, respectively), and the Architectural Barriers Act (which applies to federal facilities). Any housing (including single family detached homes) constructed by federal, state, or local government entities or constructed using federal funds may be subject to accessibility requirements under these laws.

Housing funded by HUD also must meet the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. Under the UFAS, all federally assisted new construction housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

Private Sector – Lending Policies and Practices

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by census tract, City, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

Applicant Income	Non-Hispanic				Hispanic	All Applicants* *
	White	Black	Asian	Other*		
Low Income (0 – 50% AMI)						
Total Applications	205	8	7	5	40	313
Loan Origination Rate	31.7%	37.5%	0.0%	0.0%	27.5%	29.4%
Loan Denial Rate***	43.4%	50.0%	71.4%	20.0%	60.0%	47.6%
Moderate Income (50 – 100% AMI)						
Total Applications	722	59	52	15	124	1,135
Loan Originated Rate	51.7%	50.8%	48.0%	40.0%	46.0%	50.0%
Denial Rate	24.2%	8.5%	23.1%	67.0%	30.7%	24.5%
High Income (100% AMI and over)						
Total Applications	1,945	70	67	56	176	2,817
Loan Origination Rate	58.5%	54.3%	58.2%	50.0%	49.4%	56.9%
Denial Rate	14.9%	24.0%	20.9%	8.9%	22.2%	15.9%
Total						
Total Applications	2,922	141	133	73	346	4,680
Loan Origination Rate	62.8%	50.8%	48.1%	40.0%	46.0%	49.3%
Denial Rate	19.2%	18.4%	24.8%	19.2%	29.5%	19.1%
*Includes American Indians and Alaskan Natives, Native Hawaiians and Pacific Islanders, and persons of other or multiple races. Note: Analysis is based on applicants only and does not include co-applicants. **All Applicants includes categories excluded from other figures in table: Mexican, Puerto Rican – Not Hispanic or Latino, Information not provided by applicant, not applicable. ***Applications denied by financial institution. Does not include applications approved but not accepted; application withdrawn by applicant; file closed for incompleteness; preapproval request denied by financial institution.						

Table 44. Loan approval and denial rates by applicant race/ethnicity, City of Palm Beach Gardens census tracts, 2018
Source: FFIEC 2018 Home Mortgage Disclosure Act Data

With only 313 total applications, there are relatively few low-income applicants for loans (those applicants with incomes at 0 to 50% of area median income). For low-income applicants, loan origination rates ranged from 27.5% for Hispanics to 37.5% for Non-Hispanic Black applicants. Denial rates were highest for Asian applicants (71.4%) followed closely by Hispanic applicants (60.0%) and lowest for Other applicants (20.0%).

Moderate income applicants had higher approval rates and lower denial rates than the low-income group for all races/ethnicities. In the moderate-income band, minority applicants had loan origination rates from 40.0% (for Others) to 50.8% (Blacks/African Americans), compared to 51.7% for Whites. Denial rates were highest for Other applicants (67.0%) and lowest for Blacks/African Americans (8.5%).

At the high-income level, applicants had even higher approval rates and lower denial rates than the low-income group for all races/ethnicities. In the high-income band, minority applicants had approval rates

from 40.0% to 50.8%, compared to 62.8% for Whites. Denial rates were highest for Asian applicants (24.8%) and lowest for Whites (19.2%).

The table below identifies reasons for loan denials by race and ethnicity. For each minority group, the distribution of loan denial reasons is compared to that of White applicants (as a reference group). Findings are summarized below:

- Reasons for denial vary by race and ethnicity. Collateral, debt-to-income ratio, and credit history were top reasons for denials across all race/ethnicities.
- For Asian loan applicants, denial reasons varied, with debt-to-income ratio being the highest (39.4%) followed by credit history (24.2%).
- For Hispanic applicants, debt-to-income ratio was the denial reason with the largest share of responses (42.2%), followed by credit history (26.5%).
- For Black/African American applicants, credit history had the highest share (34.6%) followed by debt to income ratio (26.9%).

	Non-Hispanic				Hispanic
	White	Black	Asian	Other	
Total Number of Denials	562	26	33	14	102
Debt-to-income ratio	38.8%	26.9%	39.4%	28.6%	42.2%
Employment history	1.2%	0.0%	0.0%	0.0%	1.0%
Credit history	24.6%	34.6%	24.2%	21.4%	26.5%
Collateral	13.7%	0.0%	9.1%	14.3%	14.7%
Insufficient cash	2.1%	3.8%	3.0%	0.0%	2.0%
Unverifiable information	3.4%	15.4%	0.0%	14.3%	1.0%
Credit application incomplete	9.1%	11.5%	15.2%	7.1%	8.8%

Table 45. Reasons for Loan Denial by Applicant Race and Ethnicity, City of Palm Beach Gardens census tracts, 2018.

Source: FFIEC 2018 Home Mortgage Disclosure Act Data

Public and Private Sector

Fair Housing Enforcement

The federal FHA prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. The U.S. Department of Justice (DOJ) and HUD are jointly responsible for enforcing the FHA. Two HUD programs are dedicated to the enforcement of the Fair Housing Act: Fair Housing Assistance Program (FHAP) and Fair Housing Initiatives Program (FHIP). HUD's Office of Fair Housing and Equal Opportunity (FHEO) is responsible for administering FHIP, FHAP, and HUD's investigation of fair housing and fair lending complaints. The Civil Rights Division of the U.S. Department of Justice (DOJ) may also investigate complaints.

The State of Florida and Palm Beach County have also adopted fair housing laws. HUD has determined that the Florida Fair Housing Act (FFHA) is substantially equivalent to the federal Fair Housing Act meaning that the state law covers the protected classes in the Fair Housing Act. State or local law may also provide additional protected classes as is the case in Florida where it is unlawful to discriminate in land use decisions or in the permitting of developments based on protected characteristics, or based on the source of financing of a development or proposed development. The FFHA also protects persons who are pregnant or in the process of becoming legal custodians of children 18 years of age or younger, or persons who are themselves handicapped or associated with a handicapped person.

The Palm Beach County Fair Housing Ordinance (Palm Beach County Code of Ordinances, Volume I, Chapter 15, Article 3 Housing, Places of Public Accommodation) offers protections to additional protected classes. The Palm Beach County ordinance protects all of the following classes: race, sex, color, religion, national origin, disability, familial status, sexual orientation, age, marital status, or gender identity or expression.

State and local government agencies certified by HUD to enforce state or local fair housing laws that are substantially equivalent to the Fair Housing Act receive FHAP funds. HUD provides funding to the Florida Commission on Human Relations (FCHR), the agency charged with enforcing the state's civil rights laws, including the FFHA. Through annual work share agreements FCHR receives and investigates housing discrimination complaints referred by HUD. HUD provides FHAP funding for processing dual-filed complaints, training, provision of technical assistance, the creation and maintenance of data information systems, and the development and enhancement of education and outreach projects, special enforcement efforts, partnership initiatives, and other fair housing projects.

Legal services organizations, typically mission-based nonprofits, offer free or low-cost services to clients based on a wide range of discrimination bases. In the City of Palm Beach Gardens and neighboring region, the Legal Aid Society of Palm Beach County (LASPBC) and the Fair Housing Center of the Greater Palm Beaches (FHC) provide representation and housing discrimination services to low-income and vulnerable individuals in civil matters, with eligibility typically based on income and assets of all members of the household. In a City like Palm Beach Gardens, where a significant portion of the City's housing stock is effectively governed by homeowner's association (HOA) rules and regulations, it is essential that fair housing organizations, whether it be LASPBC or FHC or some other qualified entity, should offer fair housing training to HOAs. HOAs are subject to federal, state, and local fair housing ordinances, and can unintentionally violate the fair housing rights of prospective and current homeowners.

Complaint Process

Persons suspecting that they have been discriminated against can file a fair housing complaint at the federal, state, or local level by contacting HUD, DOJ, FCHR, FHC, LASPBC, or the OEO. The chart below provides information on how residents can file a housing discrimination complaint with any of the fair housing enforcement organizations.

How to file a Housing Discrimination Complaint	
<p>To file a housing discrimination complaint with HUD:</p> <ul style="list-style-type: none"> • Place a toll-free call to 1-800-440-8091 or TTY 1-800-927-9275; • Complete the “on-line” complaint form available on the HUD website; • Submit a claim of housing discrimination on the HUD Complaint Mobile App; or • Mail a completed complaint form or letter to: Atlanta Regional Office of FHEO U.S. Department of Housing and Urban Development Five Points Plaza 40 Marietta Street, 16th Floor Atlanta, Georgia 30303-2806 	<p>To report an incident of housing discrimination to the DOJ, or to alert the DOJ of matters involving a pattern or practice of discrimination or matters involving denial of rights to groups of persons:</p> <ul style="list-style-type: none"> • Call the Fair Housing Tip Line at 1-800-896-7743; • Email fairhousing@usdoj.org; or • Mail a letter to: U.S. Department of Justice Civil Rights Division Housing and Civil Enforcement Section – G St. 950 Pennsylvania Avenue, N.W. Washington, DC 20530
<p>To file a complaint with FCHR, complainants must contact the agency within one year of the date on which the alleged act of discrimination occurred.</p> <ul style="list-style-type: none"> • Telephone 850-488-7082; or • Mail or fax the Technical Assistance Questionnaire for Housing Complaints to: Florida Commission on Human Relations Office of Customer Service 4075 Esplanade Way, Room 110 Tallahassee, FL 32399 Fax 850-487-1007 	<p>To file a complaint with the Legal Aid Society of Palm Beach County, contact:</p> <ul style="list-style-type: none"> • Call 561-655-8944 • Apply online: https://legalaidpbc.org/how-do-i-get-help/
<p>To file a complaint with the Fair Housing Center of the Greater Palm Beaches, submit an online complaint form here: https://fairhousingflorida.com/file-a-complaint/</p>	<p>To file a complaint with the Palm Beach County Office of Equal Opportunity, you may:</p> <ul style="list-style-type: none"> • Complete an online questionnaire, available here: [link] • Or call 561-355-4883.

Table 46. How to file a housing discrimination complaint, City of Palm Beach Gardens.

If a complaint is filed with HUD under the federal Fair Housing Act and the complaint falls within the jurisdiction of FCHR, HUD must refer the complaint to the local or state agency and may take no further action, except under limited circumstances. Once the complaint is filed with FCHR, the process is as follows:

- A person alleging discrimination under the FFHA has one year after the discriminatory housing practice to file a complaint with FCHR.
- FCHR has 100 days after receiving the complaint to complete an investigation and issue a determination.
- FCHR can decide to resolve the complaint and eliminate or correct the alleged discriminatory housing practice through conciliation.
- If, within 180 days after a complaint is filed, FCHR has been unable to obtain voluntary compliance, the complainant may initiate civil action or petition for an administrative determination.
- If the commission finds reasonable cause, the claimant may request that the Attorney General bring the civil action against the respondent.
- A civil action must be commenced within two years after the alleged discriminatory act occurred.
- The court may continue a civil case if conciliation efforts by FCHR or by a local housing agency are likely to result in a satisfactory settlement.
- If the court finds that a discriminatory housing practice has occurred, the court must issue an order prohibiting the practice and providing administrative relief.
- Possible remedies include injunctions, restraining orders, fines and actual and punitive damages, court costs, and reasonable attorney's fees.

Information Programs and Community Outreach

The City of Palm Beach Gardens endeavored to engage with residents of the City during the development of this AI. This outreach was accomplished primarily through a public meeting for the Consolidated Plan and associated AI to engage stakeholders regarding barriers to fair housing in the region, and publication of a survey to collect feedback from residents.

In addition to the City's intentional outreach for development of this AI, area fair housing agencies regularly conduct outreach and information programs. For instance, LASPBC offers regular online and in-person trainings on landlord and tenant fair housing laws. The City also promotes fair housing through research and publication of the AI and offering training and education on homeowner counseling services for minority populations, including persons with limited English proficiency.

Based on findings in this AI, the City will continue to engage with homeowner's associations (HOA), landlords, tenants, and stakeholders in the area to promote fair housing, train on applicable laws, and offer best practices.

Visitability in Housing

Visitability is a voluntary standard endorsed by HUD to allow mobility impaired persons to visit families and friends where this would not otherwise be possible. Visitability means that 1) at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk, 2) the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space, and 3) at least a half bathroom on the main floor of the house. The visitability concept applies to single family and other housing types that are not covered by federal law to incorporate accessibility features. Unlike accessibility, a visitable home does not require that all features of a dwelling unit be made accessible. The benefits of visitability include:

- An increase in the availability of housing options for individuals who may not require full accessibility;
- Providing property owners with assistance in making reasonable accommodations and reducing, in some cases, the need for structural modifications or transfers when individuals become disabled in place; and
- Improvement in the marketability of units.

The City of Palm Beach Gardens has not developed a written visitability policy however, the City has adopted the Florida Building Code, which includes compliance with the 2012 Florida Accessibility Code for Building Construction adopted pursuant to Section 553.503, Florida Statutes. The Florida Housing Finance Corporation has also adopted Universal Design and Visitability Features in all state funded developments that involve new construction and rehabilitation of housing units.

The Florida Accessibility Code expands the requirements of the Fair Housing Act and the ADA standards by requiring that all new single-family houses, duplexes, triplexes, condominiums, and townhouses provide at least one bathroom with a door that has a 29-inch clear opening on each habitable grade level. This provision in the Florida Accessibility Codes promotes the concept of visitability and the City does make accessibility improvements in accordance with the building code and rehabilitation standards.

Assessment of Current Public/Private Fair Housing Programs and Activities

The City of Palm Beach Gardens Beach is committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through its HUD entitlement grant funding under the CDBG program. Coordination with various state and local agencies has resulted in significant program and service diversity to assist in meeting housing needs throughout the City. The City will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

Current programs supporting fair housing efforts in the City include:

HUD Entitlement Funding

The City of Palm Beach Gardens is entitled to CDBG funding. This program is versatile and provides communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG is a primary funding source for the City in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the purpose of the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

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

This document serves as the City's updated AI in accordance with HUD regulation at 24 CFR 570.904(c)(1) for HUD entitlement grantees. The City is committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This AI coincides with the City's 2020-2024 Consolidated Plan, which includes the City's certification of compliance with fair housing requirements.

The City of Palm Beach Gardens continues to further fair housing efforts through its HUD entitlement grant program by funding activities including housing rehabilitation with a focus on supporting low- and moderate-income residents.

Conclusions and Impediments

In its Fair Housing Planning Guide, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices. In the City of Palm Beach Gardens, this extends to Palm Beach County's expanded list of protected classes for discrimination based on age, sexual orientation, marital status, and gender identity or expression. Throughout this analysis various community issues have surfaced, both positive and negative. Some of these issues represent general community needs and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments.

In this section, impediments to fair housing choice are listed. Each impediment is associated with an "action plan," or set of specific actions to be conducted by the City of Palm Beach Gardens and partner agencies over the next 5 years. By implementing the recommendations, the City will start to correct the identified impediments to fair housing choice.

The recommendations and actions listed in this section meet two critical criteria: they must be both meaningful and feasible. Actions must be meaningful in that they have a reasonable expectation of reducing barriers to fair housing choice. As well, actions must be feasible in that they are within the scope of the City of Palm Beach Gardens' authority and within the scope of funding considerations.

Impediments and Action Plan

#	Impediment	Actions	Timeline	Intended Outcomes
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.	<ol style="list-style-type: none"> 1. Pursue opportunities for increasing density in downtown areas and creating a greater supply of workforce housing and mixed-use zones. 2. Allow accessory dwelling units (ADUs) by right in most residential zones. 	2020 - 2024	<ol style="list-style-type: none"> 1. Increased housing supply. 2. A more walkable city, decreasing household costs and improving health. 3. More housing options for all households.
2	Palm Beach Gardens has no publicly assisted housing within city limits, leading to a shortage of affordable housing.	<ol style="list-style-type: none"> 1. 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. 2. Work with affordable housing developers, particularly nonprofit developers, to construct subsidized housing. 3. Conduct a study of existing land use and zoning regulations to determine avenues for permitting, by right, a mix of housing types and sizes. 	2020 - 2024	<ol style="list-style-type: none"> 1. Increased options for low- and moderate-income households. 2. Increased supply of housing affordable to low- and moderate-income households.
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.	<ol style="list-style-type: none"> 1. Support a fair housing organization to offer training and outreach to HOA Boards in Palm Beach Gardens. 	2020 - 2024	<ol style="list-style-type: none"> 1. Reduced discrimination for HOA regulated properties. 2. Improved understanding of fair housing regulations for HOAs.
4	The most common reason for home loan denial is poor credit history.	<ol style="list-style-type: none"> 1. Fund or partner with a HUD-certified credit counseling agency to support credit counseling services for low- and moderate-income protected class members in Palm Beach Gardens. 	2020 - 2024	<ol style="list-style-type: none"> 1. Reduced share of loan denial on the basis of credit history, as reported by HMDA data.

Signature Page

1. Submission date:
2. Submitter name: City of Palm Beach Gardens
3. Type of submission: Single program participant
4. Type of program participant(s): Consolidated Plan Participant
5. Sole or lead submitter contact information:
 - a. Name:
 - b. Title:
 - c. Department:
 - d. Street address:
 - e. City:
 - f. State:
 - g. Zip code:
6. Period covered by this assessment: 2020 - 2024
7. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AI in compliance with the requirements of the Department of Housing and Urban Development;

Signature:

Date:

Appendix

Community Survey

The City of Palm Beach Gardens published and advertised an online survey to collect community feedback on the degree to which residents understand their fair housing rights, the demographics of respondents, and the degree to which respondents think there is equal access to communities of opportunity in the County. A total of 57 respondents completed the survey. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although several questions allowed respondents to offer written comments.

Respondent demographics

A majority of respondents reported their race/ethnicity as White (78.43%). Approximately 7.8% of respondents were Black/African American, and another 7.8% said they were Latino/Hispanic. Finally, approximately 5.9% of respondents noted they were of multiple races.

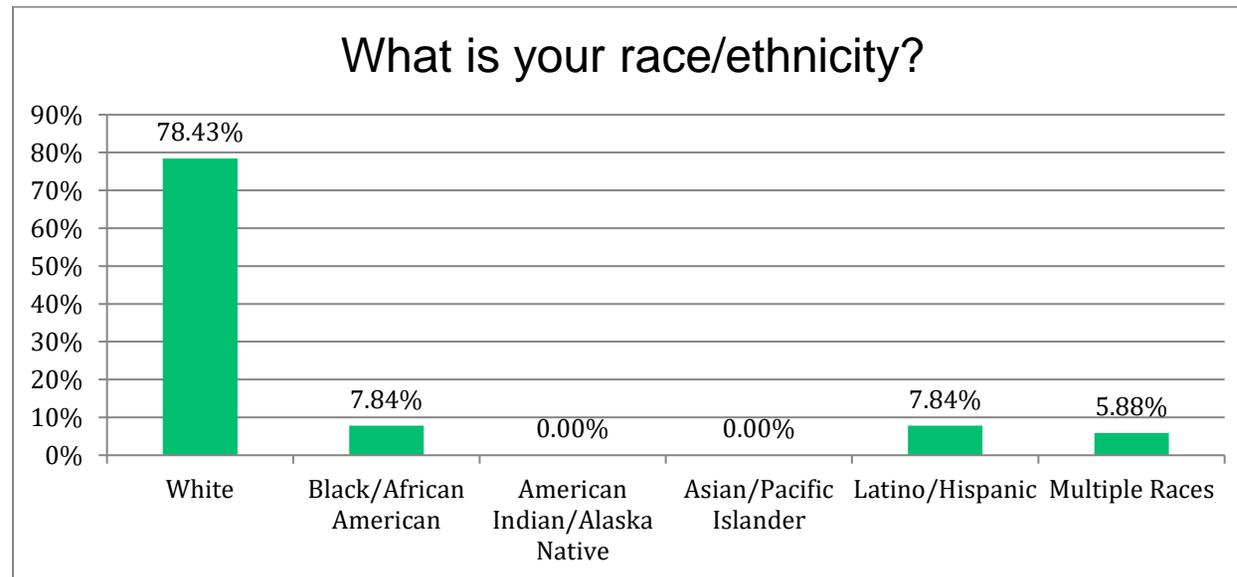


Figure 18. Community survey, what is your race/ethnicity?

Respondents were disproportionately female: when asked their gender, 51.85% said they were female and 37.04% said they were male. Additionally, respondents reported whether they were 62 years or older. For this response, 29.63% of respondents said they were 62 years or older.

Respondents were also asked their annual household income, with the distribution reflecting a concentration of high-income households in the City of Palm Beach Gardens. The income category with the most responses was \$100,000 and over, with 66.67% of responses. The income category with the second most responses was \$50,000 to \$74,999, with 14.58% of all responses. Respondents with annual household income below \$35,000 represented only 4.16% of all respondents.

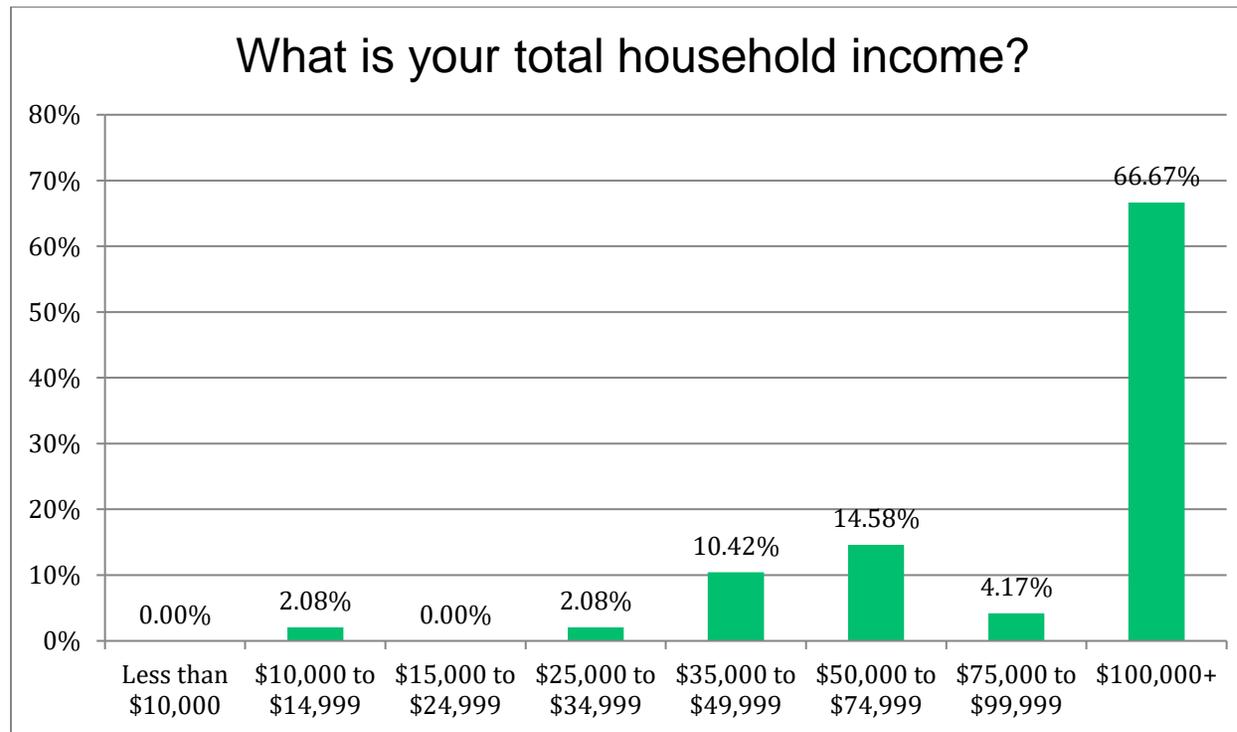


Figure 19. Community survey, what is your total household income?

Housing discrimination and Fair Housing Rights

A majority of respondents indicated they understood their fair housing rights (94.74%), approximately 3.5% of respondents said they did not understand their rights, and a further 1.75% of respondents indicated they were not sure. Compared to other jurisdictions that conduct fair housing planning and outreach efforts, City of Palm Beach Gardens respondents to this survey believe they are better educated and knowledgeable about their fair housing rights.

In terms of actual experience of housing discrimination, 91.07% of respondents indicated they had not experienced discrimination since living in Palm Beach Gardens or surrounding areas. Conversely, 1.79% said they had experienced housing discrimination and 7.17% indicated they were not sure. In answering what type of organization or person did the discrimination, a majority (84.62%) of respondents indicated it was an organization other than a landlord, real estate agent, government employee, loan officer, or HOA. Of the 57 respondents to the survey, 44 skipped this question, presumably because they had not experienced housing discrimination.

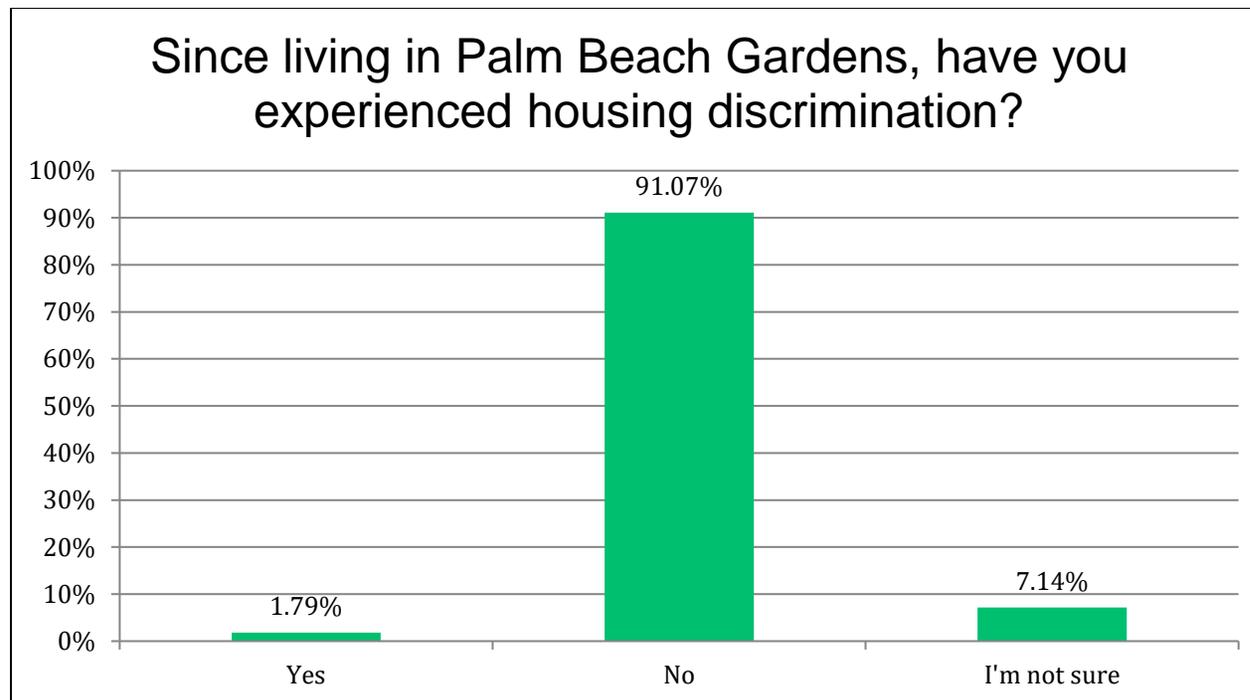


Figure 20. Community survey, since living in Palm Beach Gardens, have you experienced housing discrimination?

Reporting awareness

The City included a series of questions to assess the degree to which respondents understand the proper procedure or agencies to report housing discrimination. First, respondents were asked whether they had filed a report of the incident previously described in the survey. In response, 20.37% of respondents indicated they did not file a report of the discrimination incident, zero respondents said they did file a report, and 79.63% indicated the question was not applicable to them. The respondent was then asked if they did not file a report to indicate the reason for not doing so. Approximately 75% of respondents indicated Other, and 6.25% of respondents indicated a variety of reasons listed in the figure below. Further examination of the “Other” responses show a listing of reasons available as options in the survey response, including not knowing how to file, fear of retaliation from a landlord, and the belief that reporting would not help.

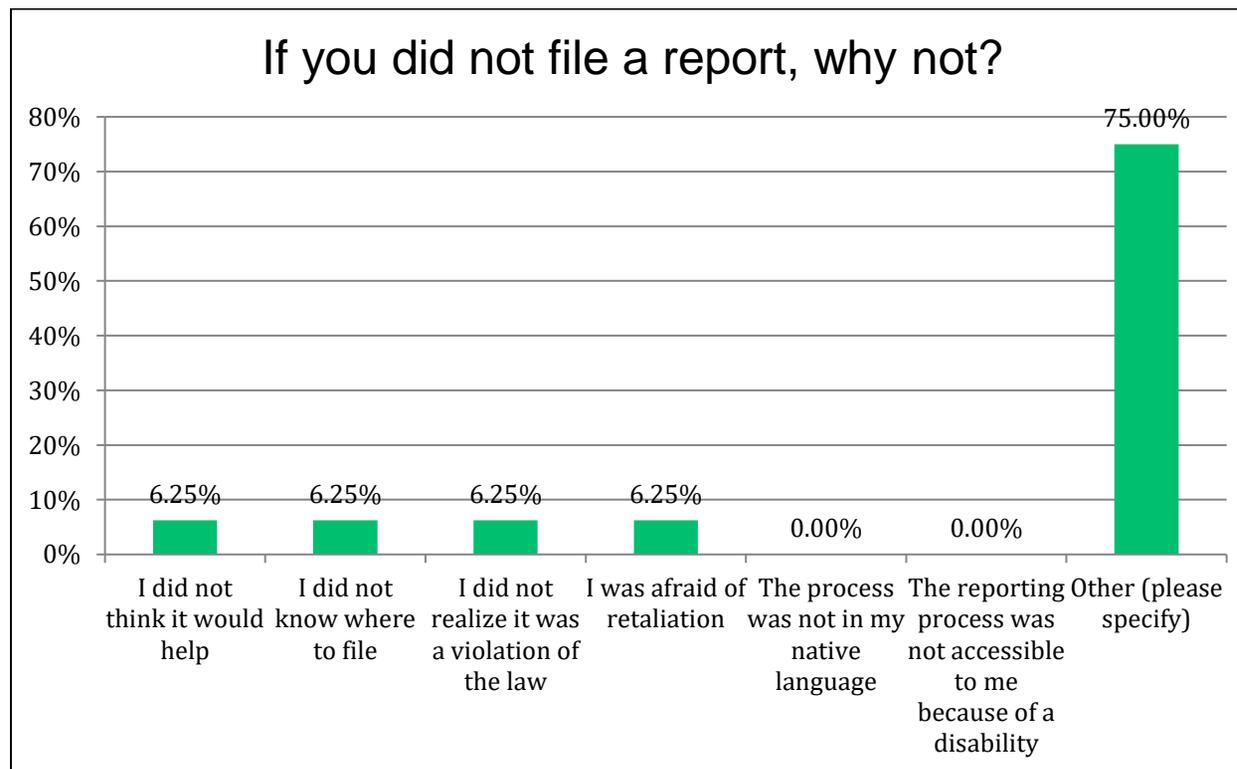


Figure 21. Community survey, if you did not file a report, why not?

Respondents were asked what they would do if they were discriminated against in housing choice. More than half of respondents indicated they would report the incident (63.27%). Approximately 14% of respondents said they would not know what to do, and a further 14% indicated they would tell the person or organization that discriminated against them.

Access to opportunity

Respondents were asked to report the degree to which housing choice is limited to certain geographic neighborhoods. There was some variation in responses to the question, with 68.25% responding it was not geographically limited, 22.22% saying it is geographically limited but not providing an example, and 9.26% responding yes as well as offering a specific area in the City that is accessible.

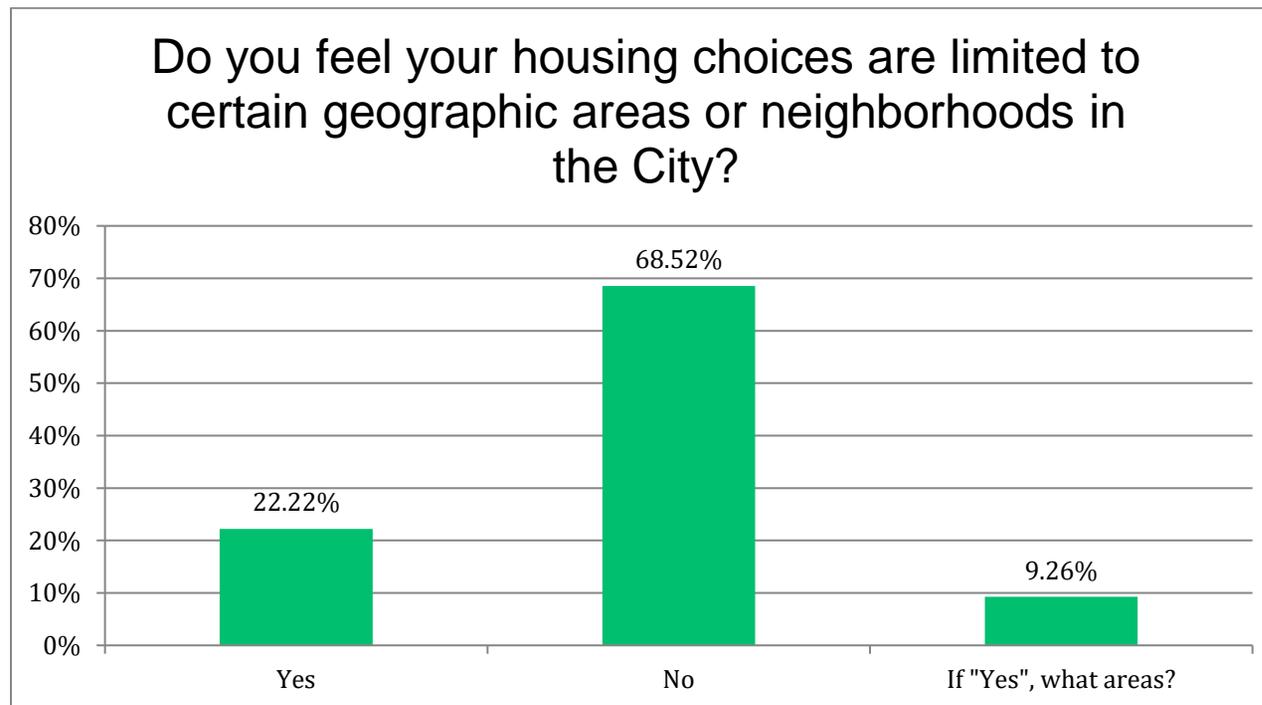


Figure 22. Community survey, do you feel your housing choices are limited to certain geographic areas or neighborhoods in the city?

Respondents were asked what information had they seen or heard regarding fair housing programs, laws, or enforcement in the City of Palm Beach Gardens, including the website for LASPBC, FHC, and the OEO. A majority of respondents indicated they had received no information (73.08%), followed by fair housing flyers (15.38%), then from the website of fair housing agencies in the area (11.54% for LASPBC and OEO).

What information have you seen or heard regarding fair housing programs, laws, or enforcement in the City of Palm Beach Gardens or Palm Beach County?

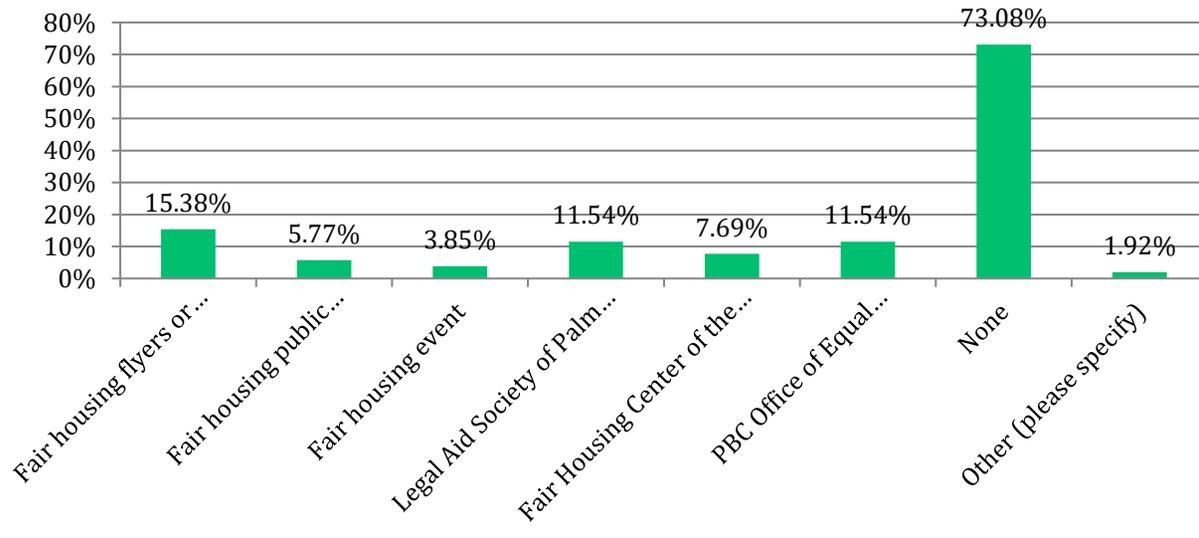


Figure 23. Community survey, what information have you seen or heard regarding fair housing programs, laws, or enforcement in the City of Palm Beach Gardens or Palm Beach County?