

---

## ***HOUSING ELEMENT***

---

### **PURPOSE**

The Housing Element addresses the housing characteristics and needs of the City, including, but not limited to, a description of existing housing types, condition of existing units, overcrowding, affordability, availability, and the demand for affordable housing in the area. The Housing Element also includes goals, policies and programs to acknowledge and respond to the City's housing needs.

The Housing Element provides analysis of the progress made since the previous element was drafted in 2014 and evaluates the needs for the current planning period (2022 through 2029). In drafting the current Housing Element, analysis of existing and projected housing needs was derived from available local, county, and statewide data, which are cited throughout the document. Note that the results of the 2020 Census were not available at the time this Element was prepared and adopted.

The City's land use map includes a variety of residential densities to accommodate all types of housing, from single-family to high-density residential development. The Housing Element works in tandem with the Land Use Element by assuring that adequate lands are available to provide sufficient housing for the period from 2022 through 2029.

### **CALIFORNIA LAW**

AB 2853, passed in 1980, established Government Code Article 10.6, Section 65580 et. seq. to define the need for, and the content of, Housing Elements. At its core, the law requires that the "housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing" to meet the State's housing goals.

California Government Code requires that every City and County prepare a Housing Element as part of its General Plan. In addition, State law contains specific requirements for the preparation and content of Housing Elements. According to Article 10.6, Section 65580, the Legislature has found that:

- (a) The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every California family is a priority of the highest order.
- (b) The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.

- (c) The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.
- (d) Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
- (e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the General Plan and to cooperate with other local governments, and the state, in addressing regional housing needs.
- (f) Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article

Section 65581 of the Government Code states that the intent of the Legislature in enacting these requirements is:

- (a) To assure that counties and cities recognize their responsibilities in contributing to the attainment of the state housing goal.
- (b) To assure that counties and cities prepare and implement housing elements which, along with federal and state programs, will move toward attainment of the state housing goal.
- (c) To recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the state housing goal, provided such a determination is compatible with the state housing goal and regional housing needs.
- (d) To ensure that each local government cooperates with other local governments to address regional housing needs.

Government Code Section 65583 outlines the required content of all housing elements, including identification and analysis of existing and projected housing needs, and a statement of goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. The basic components of a Housing Element were established in Section 65583, and required that each Element include:

- An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of local needs.
- A statement of the community's goals, quantified objectives, and policies relative to the maintenance, improvement, and development of housing.
- A program that sets forth a schedule of actions to implement the policies and achieve the goals and objectives of the Housing Element to provide housing for all economic segments of the community guided by the following state housing objectives.
- Provision of decent housing for all persons regardless of age, race, sex, marital status, source of income, or other factors.
- Provision of adequate housing by location, type, price and tenure.

- Development of a balanced residential environment including access to jobs, community facilities, and services.

Housing Element law is regularly updated, expanded and modified. The most recent update to Housing Element law occurred in 2017, when a series of bills were passed into law to address the State-wide housing crisis. The laws passed in 2017 addressed a wide range of housing-related issues, including Housing Elements, which are summarized below.

- *SB 2* established a recordation fee for real estate documentation which would fund planning grants for affordable housing and affordable housing projects.
- *SB 3* placed a \$4 billion general obligation bond on the November 2018 ballot to fund affordable housing, farmworker housing, transit-oriented development, infill infrastructure and home ownership.
- *SB 35* mandated a streamlined approval process for infill affordable housing projects in communities that have not, according to the Department of Housing and Community Development (HCD) met their affordable housing allocation (RHNA).
- *AB 72* allowed HCD to find a housing element out of compliance with State law, and to refer the non-compliant element to the State Attorney General for action at any time during a Housing Element planning period.
- *AB 73* provided State-funded financial incentives for local jurisdictions which choose to create a streamlined zoning overlay for certain affordable housing projects.
- *SB 166* required that development proposals on local jurisdictions' sites inventory cannot be reduced in density without findings, and/or the identification of additional sites to result in 'no net loss' of affordable housing units in the sites inventory.
- *SB 540* provided State funding for the planning and implementation of workforce housing opportunity zones for very low-, low- and moderate-income households.
- *AB 571* modified the farmworker tax credit program to allow HCD to advance funds to migrant housing center operators at the beginning of each planting season, and allowed migrant housing to remain open for up to 275 days annually.
- *AB 678* amended the Housing Accountability Act to limit a local jurisdiction's ability to deny low- and moderate-income housing projects by increasing the required documentation and raising the standard of proof required of a local jurisdiction.
- *AB 686* (approved in 2018) required a public agency to administer its programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing.
- *AB 879* amended the annual reporting requirements of local jurisdictions to HCD regarding proposed projects, including processing times, number of project applications and approvals, and required approval processes.
- *AB 1397* amended the requirements of adequate sites analysis to assure that sites are not only suitable, but also available, by requiring additional information in site inventories.
- *AB 1505* allowed local jurisdictions to adopt local ordinances that require affordable housing units on- or off-site when approving residential projects.
- *AB 1515* established a 'reasonable person' standard to consistency of affordable housing projects and emergency shelters with local policies and standards.
- *AB 1521* placed restrictions on the owners of affordable housing projects when terminating or selling their projects.

## CONSISTENCY WITH OTHER GENERAL PLAN ELEMENTS

This current update of the Housing Element (2022-2029) was drafted concurrent with the City's 2040 General Plan update (which commenced in 2019). The Housing Element, as with all Elements of the General Plan, must be consistent with all other Elements. For example, residential development capacities established in the Land Use Element are incorporated into the Housing Element. The Land Use Element also identifies use designations at densities that will facilitate the provision of a range of residential housing products for all income groups. The Circulation and Mobility Element plays a role in the location of residential development in relation to roadways, transit, pedestrian, and bicycle facilities. The Noise Element establishes noise levels appropriate for residential uses. Whenever one element of the General Plan is amended, other elements, including the Housing Element, will be reviewed and modified, if necessary, to ensure consistency between elements.

## PREVIOUS HOUSING ELEMENT EVALUATION

The City's previous Housing Element included a number of policies and programs to encourage a balanced range of housing available to all income levels and household compositions in quantities sufficient to meet the needs of the community for the 2014-2021 planning period.

[Since the adoption of the last housing element update, the City's Housing Successor Agency successfully expanded housing options for special needs groups including low-income seniors and veterans. Specifically, Programs 1.B.3, 1.D.1, 2.A.4 encouraged various forms of outreach efforts, development incentives and financial assistance that resulted in the construction of 60-unit affordable housing project for veterans \(Veterans Village\) and the renovation of the 224-unit affordable housing project for seniors \(Cathedral Palms\). The City has also provided additional resources to the homeless population by expanding the Homeless Liaison Police Officer program from one to two officers, and is still an active participant in CVAG's Homeless Task Force \(Programs 1.B.5 and 1.F.1\). The City continues to participate in regional efforts that seek innovative housing solutions for low income households and other special needs groups \(Program 2.C.2\)](#)

[A full report on the City's progress in meeting the objectives of the policies and programs set forth during the 2014-2021 planning period is described in Technical Appendix A.](#)

## DEMOGRAPHIC BACKGROUND

Housing needs for Cathedral City are based on a comprehensive assessment of current and projected housing needs for all segments of the community and all economic groups. Rising costs and increasing competition for available physical and financial resources make it difficult for some families, especially lower income and special needs families, to find affordable housing. The Demographics section of the Housing Element presents the demographic background necessary for the comprehensive analysis of the City's housing needs.

### Regional Setting

Cathedral City is located in the Coachella Valley, a subregion of Riverside County. The County encompasses a large portion of Southern California, and over the past decade has experienced a

slow growth when compared to previous decades. According to Census and Department of Finance data, the County’s population increased by 41.7%, from 1,545,313 in 2000 to 2,189,641 in 2010, and by 12.8% from 2010 to 2,470,546 in 2019. The incorporated cities of the Coachella Valley generally followed similar trends for population growth within the same time period.

### Population Trends

Cathedral City is the second most populous city in the Coachella Valley region of Riverside County. Between 2000 and 2010, the City population increased by 17.3% from 43,647 to 51,200 residents. Between 2010 and 2019, the population increased by 6.2%, from 51,200 to 54,357 residents. The percent increase was greater than that of Rancho Mirage (5.7%) but less than all other Coachella Valley cities and Riverside County, which ranged between 7.5% and 20.7%.

**Table 1**  
**Population Trends – Cathedral City**

Year	Population	Numerical Change	Percent Change	Average Annual Growth Rate
2000	43,647	--	--	--
2010	51,200	7,553	17.3%	1.7%
2019	54,357	3,157	6.2%	0.7%

Source: 2000 and 2010 U.S. Census; American Community Survey Data Profiles 5-Year Estimates, 2019.

**Table 2**  
**Population Trends – Neighboring Jurisdictions**

Jurisdiction	2010	2019	Change (2010-2019)	
			Number	Percent
Indio	76,036	91,756	15,720	20.7%
Coachella	40,704	45,181	4,477	11.0%
Desert Hot Springs	25,938	28,585	2,647	10.2%
La Quinta	37,467	41,076	3,609	9.6%
Palm Desert	48,445	52,575	4,130	8.5%
Indian Wells	4,958	5,370	412	8.3%
Palm Springs	44,552	47,897	3,345	7.5%
<b>Cathedral City</b>	<b>51,200</b>	<b>54,357</b>	<b>3,157</b>	<b>6.2%</b>
Rancho Mirage	17,218	18,193	975	5.7%
Riverside County	2,189,641	2,470,546	280,905	12.8%

Source: 2010 U.S. Census; American Community Survey 2019 5-Year Estimates.

Cities are listed in order of highest to lowest percentage of population change.

The Southern California Association of Governments (SCAG) prepares population forecasts for cities within its jurisdiction as part of future growth policies and programs. SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) projects that the Cathedral City population will reach 68,100 in 2040. As the City grows, the demand for a variety of housing products will increase; however, the need for additional housing must be evaluated in light of the slowing annual growth rate that has occurred since 2010.

**Race and Ethnicity**

The racial and ethnic distribution of Cathedral City residents in 2010 and 2019 is shown in the following table. Residents who categorize themselves as White comprise the largest race/ethnicity; this group increased from 63.5% to 75.6%. The second most prevalent race/ethnicity is “some other race,” although their share of the population decreased from 23.5% to 11.6%. The percentage of Black/African Americans, American Indians and Alaska Natives, Asians, and Native Hawaiians and Other Pacific Islanders remained largely unchanged, comprising approximately 10.2% combined during both 2020 and 2019. The percentage of residents in the “Two or More Races” category decreased from 4.2% to 2.6%. The percentage of Hispanic or Latino residents decreased slightly from 58.8% to 58.6%.

**Table 3  
Population by Race/Ethnicity**

Race/Ethnicity	2010		2019	
	Persons	%	Persons	%
One Race				
White	32,537	63.5%	41,101	75.6%
Asian	2,562	5.0%	3,345	6.2%
Black or African American	1,344	2.6%	1,482	2.7%
American Indian and Alaska Native	540	1.1%	515	1.0%
Native Hawaiian and Other Pacific Islander	55	0.1%	139	0.3%
Some Other Race	12,008	23.5%	6,347	11.6%
Two or More Races	2,154	4.2%	1,428	2.6%
Total	51,200	100%	54,357	100%
Hispanic or Latino (of any race)	30,085	58.8%	31,851	58.6%

Source: 2010 U.S. Census, Table P3; American Community Survey 5-Year Estimates 2019, Table DP05

**Age Characteristics**

Table 4 provides a comparison of Cathedral City age characteristics in 2010 and 2019. Approximately 38.2% of the 2019 City population consists of younger and middle-age adults (25 to 54 years), and 25.4% consists of children (0 to 19 years). However, the data show that the population is slowly aging. Between 2010 and 2019 (other than those 25 to 34 years old, which increased by 0.5%), all age groups under 55 years decreased by a combined total of 5.7%, and all age groups over 55 years increased by a combined total of 5.7%. The increase is also reflected in the median age, which increased from 36.0 years in 2010 to 39.4 years in 2019.

The data suggest that housing demand is currently highest for young adults and families with children. If the aging trend continues, there may be a growing demand for senior housing and programs that promote “aging in place”; however, this trend is likely to occur slowly, and the demand for such products will need to be evaluated over time.

**Table 4  
Population by Age**

Age Group	2010		2019	
	Persons	%	Persons	%
Under 5 years	3,546	6.9%	3,155	5.8%
5 to 9 years	3,671	7.1%	3,074	5.7%
10 to 14 years	4,024	7.9%	3,883	7.1%
15 to 19 years	4,138	8.1%	3,707	6.8%
20 to 24 years	3,383	6.6%	3,397	6.2%
25 to 34 years	6,179	12.1%	6,854	12.6%
35 to 44 years	6,769	13.2%	6,781	12.5%
45 to 54 years	6,962	13.6%	7,102	13.1%
55 to 59 years	2,658	5.2%	3,592	6.6%
60 to 64 years	2,507	4.9%	3,551	6.5%
65 to 74 years	3,959	7.7%	5,031	9.3%
75 to 84 years	2,503	4.9%	3,110	5.7%
85 years and over	901	1.8%	1,120	2.1%
Total	51,200	100%	54,357	100%
Median Age	36.0		39.4	

Source: 2010 U.S. Census Tables P12 and P13; American Community Survey 5-Year Estimates, 2019. Table DP05

**Household Income**

Incomes vary significantly by region, industry, and type of job. **Table 5** describes average income per worker, by industry, in the Coachella Valley. As shown, the highest-paying sectors are Finance/Insurance/Real Estate, Government, and Information, with incomes averaging around \$50,000 to \$60,000. The lowest-paying sectors are Retail Trade, Other Services, and Leisure and Hospitality, with incomes averaging around \$31,000.

**Table 5  
Average Income by Industry, Coachella Valley**

Industry	Average Income per Worker, 2017
Finance, Insurance, Real Estate	\$59,726
Government	\$58,711
Information	\$50,493
Education and Health Services	\$48,322
Manufacturing	\$46,340
Construction	\$45,488
Logistics	\$45,114
Professional and Business Services	\$43,736
Retail Trade	\$32,281
Other Services	\$31,836
Leisure and Hospitality	\$31,513
Agriculture	\$29,571

Source: 2019 Greater Palm Springs Economic Report, Coachella Valley Economic Partnership, Figure 29.

The following table compares median household income in Cathedral City and Riverside County in 2010 and 2019. The City’s 2010 median household income was 79% of the County’s, and the City’s 2019 median household income was 71% of the County’s. During this period, the City’s median household income increased only 1.8% compared to the County’s 13.7% increase. Income growth in Cathedral City is not keeping pace with that of Riverside County.

**Table 6  
Median Household Income**

Jurisdiction	Median Household Income			% of County Median Household Income	
	2010	2019	Percent Increase 2010-2019	2010	2019
Cathedral City	\$45,693	\$46,521	1.8%	79%	71%
Riverside County	\$57,768	\$65,712	13.7%	100%	100%

Source: American Community Survey 5-Year Estimates 2006-2010 and 2019, Table DP03

**Employment**

Like much of the Coachella Valley, a substantial portion of the City’s economy is rooted in the regional tourism and service industries. The following table describes employment by industry in Cathedral City in 2019. The data show that 23,119 residents over 16 years of age were in the

civilian-employed<sup>1</sup> labor force. The largest percentage of the population was employed in “arts, entertainment, recreation, accommodation, and food services” (21.6%), followed by “educational services, health care, and social assistance” (19.7%) and “Professional, scientific, management, admin., waste management” (13.6%).

**Table 7  
Employment by Industry**

Industry Type	2019	
	Persons	%
Civilian-employed population 16 years of age and over:		
Arts, entertainment, recreation, accommodation, food services	4,983	21.6%
Educational services, health care, social assistance	4,564	19.7%
Professional, scientific, management, admin., waste management	3,141	13.6%
Retail Trade	3,097	13.4%
Construction	1,803	7.8%
Other services, except public administration	1,486	6.4%
Finance, insurance, real estate, rental, leasing	1,107	4.8%
Transportation, warehousing, utilities	829	3.6%
Public administration	674	2.9%
Manufacturing	653	2.8%
Information	345	1.5%
Wholesale Trade	273	1.2%
Agriculture, forestry, fishing, hunting, mining	164	0.7%
Total	23,119	100.0%

Source: American Community Survey 5-Year Estimates, 2019. Table S2405

As shown in **Table 8**, more than one-third (33.1%) of the City’s civilian-employed labor force is employed in “service occupations,” followed by “management, business, science, and arts” occupations (24.6%) and “sales and office” occupations (22.5%).

**Table 8  
Employment by Occupation**

Occupation	2019	
	Persons	%
Civilian-employed population 16 years and over		
Service occupations (restaurants and food service)	7,644	33.1%
Management, business, science, and arts occupations	5,693	24.6%
Sales and office occupations	5,201	22.5%
Natural resources, construction, and maintenance occupations	2,324	10.0%
Production, transportation, and material moving occupations	2,257	9.8%
Total	23,119	100%

Source: American Community Survey 5-Year Estimates, 2019. Table DP03

<sup>1</sup> “Civilian-Employed” means non-governmental employment, typically a private or family-owned business.

As shown in **Table 9**, the City’s principal employers include health care providers, golf clubs and resorts, auto dealerships and other retailers, and educational facilities. Typical jobs at these facilities include medical providers and support staff, store clerks and managers, teachers and school administrators and support staff, auto salespeople and mechanics, and cooks and food service providers.

**Table 9**  
**Principal Employers in Cathedral City**

Employer	Number of Employees Range	Percentage of Total City Employment
Aldus Healthcare	250-499	1.03% - 2.06%
Doubletree Golf Resort	250-499	1.03% - 2.06%
Target	250-499	1.03% - 2.06%
Cathedral City High School	100-249	0.41% - 1.03%
Honda of the Desert	100-249	0.41% - 1.03%
Jessup Auto Plaza	100-249	0.41% - 1.03%
Nellie N. Coffman Middle School	100-249	0.41% - 1.03%
Palm Springs Motors	100-249	0.41% - 1.03%
Palm Springs Unified School District	100-249	0.41% - 1.03%
Stater Bros. Markets (Ramon)	100-249	0.41% - 1.03%
Toyota of the Desert	100-249	0.41% - 1.03%
<b>Total</b>	<b>1,650-5,988</b>	<b>6.78%-15.45%</b>

Source: 2019 Comprehensive Annual Financial Report, City of Cathedral City.  
“Principal Employer” is defined as a company, organization, or public entity that employs the greatest number of people as a percentage of the City’s total employment.

### Economic Trends

The Great Recession, which began in late 2007, saw high unemployment and job losses in the Coachella Valley, where every seventh person lost their job.<sup>2</sup> Regional employment started to increase by 2011 but did not reach pre-Recession levels until 2017, much later than western Riverside County, California, and the nation. The construction sector was hardest hit regionally; approximately 70% of jobs were lost and only 14% had been recovered by December 2017.<sup>3</sup> The Retail Trade sector lost approximately 6,000 jobs, but has generally returned to pre-Recession levels. Two sectors have fully recovered and even added jobs: Education and Health Services and, to a lesser extent, Leisure and Hospitality. The COVID-19 pandemic has significantly affected the City’s residents, but its long-term effects cannot be quantified at this time.

Between 2010 and 2019, annual unemployment rates in Cathedral City decreased steadily from a high of 11.4% in 2010 to a low of 3.8% in 2019.<sup>4</sup> However, analysis of employment data from 2005 to 2017 shows that, as of December 2017, Cathedral City had not recovered the job losses it incurred during the Great Recession. The City lost about 36% of jobs relative to peak

<sup>2</sup> 2019 Greater Palm Springs Economic Report, Coachella Valley Economic Partnership, Figure 24.

<sup>3</sup> Ibid, Figures 25 and 26.

<sup>4</sup> California Employment Development Department annual unemployment rates (labor force), not seasonally adjusted, not preliminary.

employment, and had recovered only about 13%.<sup>5</sup> This scenario is roughly the same for seven other Coachella Valley cities; only Palm Springs and Rancho Mirage had recovered and exceeded their previous peaks.

Current and future employment opportunities for City residents include a variety of new retail, service, cannabis product sales, manufacturing, and cultivation, and entertainment jobs. Many of these are jobs are the result of the Agua Caliente Casino/mixed-use business district currently being developed and the Downtown Arts and Entertainment District that includes the Mary Pickford Theater and CV Repertory Theater, both of which are located on East Palm Canyon Drive. Additional hospitality jobs were recently added at the new Staybridge Hotel and the renovated Doubletree Hotel and Resort. North of the freeway, the Crossings at Bob Hope and the North City Specific Plan area provide a variety of new and future employment opportunities, including general retail, mixed-use retail, housing, and cannabis-related operations.

**Table 10** describes the employment locations of Cathedral City residents. As shown, only 15.6% of City residents work in Cathedral City, suggesting a jobs-housing imbalance for City residents. More than one-third (35.4%) work in Palm Springs.

**Table 10**  
**Commuting Patterns**

Where Cathedral City Residents Work	No. of Cathedral City Residents	% of Total
Palm Springs	4,097	35.4%
Cathedral City	1,808	15.6%
Rancho Mirage	1,912	16.5%
Palm Desert	1,989	17.2%
Indian Wells	317	2.7%
La Quinta	431	3.7%
Indio	571	5.0%
Desert Hot Springs	232	2.0%
Coachella	204	1.8%

Source: 2019 Greater Palm Springs Economic Report, Coachella Valley Economic Partnership, Table 6. Based on 2015 data.  
Cities are listed in geographical order from west to east to demonstrate the correlation between commuting patterns and geographic proximity to Cathedral City.

### Household Characteristics

As shown in the following tables, from 2010 to 2019, the number of City households increased 5.5%, from 17,837 to 18,816. In 2019, the majority of households (44%) consisted of married couple families, followed by female householders with no husband present (26.3%). This was closely followed by male householders with no wife present (23.0%).

<sup>5</sup> 2019 Greater Palm Springs Economic Report, Coachella Valley Economic Partnership, Figure 28.

**Table 11  
Household Growth Trends**

Year	Number of Households	Numerical Change	Percent Change
2010	17,837	---	---
2019	18,816	979	5.5%

Sources: American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

**Table 12  
Household Types, 2019**

Household Type	No. of Households	% of Total
Married couple family	8,274	44.0%
Cohabiting couple	1,271	6.7%
Male householder, no wife present	4,319	23.0%
Female householder, no husband present	4,952	26.3%
Total Households	18,816	100%

Source: American Community Survey 5-Year Estimates Data Profiles, 2019, Table DP02.

## EXISTING HOUSING STOCK CHARACTERISTICS

### Housing Units

The City's housing stock includes an estimated 23,620 dwelling units, the majority of which are single-family detached units (55.5%). Other housing types include single-family attached units (6.5%), mobile homes (9.8%), and multi-family complexes with 2-4 units (13.3%) and 5 or more units (14.7%).

The total number of units increased by 1,183 (5.27%) between 2010 and 2019. Specifically, the number of single-family detached units increased by 616, multi-family complexes of 2-4 units increased by 696, and multi-family complexes of 5+ units increased by 1,654. The number of single-family attached units decreased by 1,507, and mobile homes decreased by 207. This discrepancy is likely due to differences in available housing data from 2010 and 2019.

**Table 13  
Housing Stock Trends – 2010 and 2019**

Unit Type	2010		2019	
	Number of Units	% Total Units <sup>1</sup>	Number of Units	% Total Units <sup>1</sup>
1-unit, detached	12,494	55.7%	13,110	55.5%
1-unit, attached	3,040	13.5%	1,533	6.5%
2 units	986	4.4%	1,420	6.0%

**Table 13  
Housing Stock Trends – 2010 and 2019**

Unit Type	2010		2019	
	Number of Units	% Total Units <sup>1</sup>	Number of Units	% Total Units <sup>1</sup>
3 or 4 units	1,461	6.5%	1,723	7.3%
5 to 9 units	870	3.9%	1,296	5.5%
10 to 19 units	346	1.5%	875	3.7%
20 or more units	600	2.7%	1,299	5.5%
Mobile home	2,511	11.2%	2,304	9.8%
Boat, RV, van, etc.	129	0.6%	60	0.3%
<b>Total</b>	<b>22,437</b>	<b>100.0%</b>	<b>23,620</b>	<b>100.0%</b>

Source: American Community Survey 5-Year Estimates Data Profiles, 2010 and 2019. Table DP04  
<sup>1</sup> Differences due to rounding

**Residential Building Permits, 2014-2020**

The following table summarizes residential building permits issued from 2014 to 2020. Permits were issued for a total of 422 residential units, 415 of which were single-family units and had an average value of \$206,436, 2 were duplex units and had an average value of \$150,000, and 5 were multifamily units with an average value of \$164,692. Eight (8) accessory dwelling unit permits were issued in 2020 with an average value of \$12,964.

**Table 14  
Residential Building Permits, 2014-2020**

Year	Single-Family		Multi-Family 2-4 Units		Multi-Family 5+ Units		Accessory Dwelling Units (ADU)	
	No. of Units	Average Value/Unit	No. of Units	Average Value/Unit	No. of Units	Average Value/Unit	No. of Units	Average Value/Unit
2014	32	\$205,190	0	---	0	---	0	---
2015	16	\$209,872	0	---	0	---	0	---
2016	46	\$214,615	0	---	0	---	0	---
2017	56	\$202,114	0	---	0	---	0	---
2018	84	\$200,380	0	---	0	---	0	---
2019	159	\$201,067	0	---	0	---	0	---
2020	210	\$211,812	2	\$300,000/ \$150,000	5	\$823,460/ \$164,692	8	\$103,712/ \$12,964
<b>Total:</b>	<b>415</b>	<b>\$206,436</b>	<b>2</b>	<b>---</b>	<b>5</b>	<b>---</b>	<b>0</b>	<b>---</b>

**Housing Conditions**

The age of the City’s housing stock can be a key indicator of potential rehabilitation, repair, or demolition needs. As shown in **Table 15**, 60.8% of housing units in Cathedral City were built before 1990 and are, therefore, more than 30 years old. Depending on construction quality and

maintenance history, older homes can have problems with inadequate or unsafe mechanical systems and appliances, foundation or roof problems, inefficient windows, the presence of asbestos or lead, or other issues that affect livability and safety.

Generally, the oldest homes were built before 1940 and are located in the Downtown area. Homes built between 1940 and 1949 occur in the Cove neighborhood; homes built from 1950 to 1959 occur in the Downtown, Cove and Outpost neighborhoods; and homes built from 1960 to 1969 also occur in the Dream Homes, Outpost, and Cove neighborhoods. From 1970 to the present, the distribution of new homes has been more widespread throughout the City, with construction occurring on in-fill lots in existing subdivisions.

**Table 15**  
**Age of Housing Units, 2019**

Year Built	No. of Units	% of Total <sup>1</sup>
Built 2014 or later	147	0.6%
Built 2010 to 2013	319	1.4%
Built 2000 to 2009	4261	18.0%
Built 1990 to 1999	4530	19.2%
Built 1980 to 1989	7880	33.4%
Built 1970 to 1979	3873	16.4%
Built 1960 to 1969	1464	6.2%
Built 1950 to 1959	730	3.1%
Built 1940 to 1949	228	1.0%
Built 1939 or earlier	188	0.8%
<b>Total units</b>	<b>23,620</b>	<b>100%</b>
<b>Total Built before 1990</b>	<b>14,363</b>	<b>60.8%</b>

Source: American Community Survey 5-Year Estimates Data Profiles, 2019. Table DP04

<sup>1</sup> Differences due to rounding

Another measure of potentially substandard housing is the number of housing units lacking adequate kitchen and plumbing facilities. In Cathedral City, there are 30 units (0.16% of all units) lacking complete kitchens and 46 units (0.24% of all units) lacking plumbing facilities. More rental units have deficiencies in plumbing facilities than homeowner units, and more owner-occupied units have deficiencies in kitchen facilities than rental units. These homes could potentially benefit from rehabilitation programs.

**Table 16  
Housing Units Lacking Facilities, 2019**

Type of Deficiency <sup>1</sup>	Owner-Occupied Units			Renter-Occupied Units			Total	
	No.	Total Units in City	Percent of Total Units	No.	Total Units in City	Percent of Total Units	No.	Percent of Total Units
Lacking complete kitchen facilities	18	11,429	0.15%	12	7,387	0.16%	30	0.16%
Lacking plumbing facilities	20	11,429	0.17%	26	7,387	0.35%	46	0.24%

Source: 2019 American Community Survey 5-Year Estimates Data Profiles, Tables B25053 and B25049.  
1. The Census considers a home to lack complete plumbing or kitchen facilities if it is without any of the following: hot and cold running water, a flush toilet, and a bathtub or shower, a sink with a faucet, a stove or range, and a refrigerator.

#### Local Housing Condition Survey

The City does not currently conduct regular housing condition surveys to estimate the number of units in need of rehabilitation or replacement. However, in February 2021 the City's Code Enforcement Department conducted a records search of dwelling units with code violations to gain an idea of the current condition of existing housing stock. As of February 2021, there were approximately 158 open cases citing structural deficiencies. Most violations were associated with faulty or hazardous electrical systems (68), faulty plumbing systems (18), illegal non-conforming structures (200), general dilapidation or deterioration of the structure (20), and general health and safety code violations (32). There is no correlation made in City records between code violations and household income, however, it is expected that lower income households have greater difficulty maintaining their homes. The records search found 1,196 open cases citing aesthetic and nuisance violations. Most were associated with trash and debris (368), overgrown/dead/decayed vegetation (487), inoperative or abandoned vehicles (273), and fallen or broken fencing (68).

Based on the age of existing housing stock and number of open cases citing structural deficiencies, it can be assumed that more than 60% (14,363) of the City's housing stock either requires more regular maintenance and repair, or in the case of the older units, may also require more extensive rehabilitation or replacement. The City does not directly offer programs that assist homeowners and apartment complex owners with home maintenance and repair costs. The County of Riverside Economic Development Agency (EDA) offers home repair programs including the Home Repair Loan Program (HRLP) and the Senior Home Repair Grant (SHRG) program. According to the County's website, Cathedral City is not eligible for these programs because the City exceeds the County's income limit. However, eligibility is subject to change if the City falls below the County's income limits. The City is, however, financially participating in the renovation of the 224-unit Cathedral Palms, a special-needs housing development located in Cathedral City for extremely low- and low-income seniors.

To improve housing conditions, Program 3.A.2 requires the City to develop a Housing Rehabilitation Program that provides access to low interest loans funded by CBDG funds to low-income families who need to make improvements to make their homes safe to occupy. As part of this new program, the City shall also conduct a City-wide windshield survey every 3 years to identify general housing conditions to estimate the number of residential structures in need of

rehabilitation or replacement. The addition of this program in conjunction with a active code enforcement, the City hopes to assist a larger number of low-income homeowners to rehabilitate their homes during the 2022-2029 planning period. Table 36 includes 40 units (5 per year) to be rehabilitated through this program.

**Vacancy Rates**

The housing vacancy rate is the percentage of units that are vacant or unoccupied at a particular time. It is directly related to housing supply and demand; a low vacancy rate means there are more occupied units and can indicate higher housing demand and housing values/costs, while a high vacancy rate can indicate excess housing supply and decreased property values. A unit may be considered vacant for several reasons, such as being a vacation or seasonal home.

As shown in **Table 17**, 18,816 (79.6%) housing units in Cathedral City are occupied. Of these, about 60% are owner-occupied and 40% are renter-occupied. The remaining 4,804 units (20.3%) of all housing units are vacant. Approximately 73% of vacant units are vacant for “seasonal, recreational, or occasional use,” which is indicative of the strong vacation and second home market in the City and in western Coachella Valley. The homeowner vacancy rate is 2.9%, and the rental vacancy rate is 2.3%, both of which are relatively low.

**Table 17  
Vacancy Status, 2019**

Vacancy Status	Units	% of Total
Occupied Units:		
Owner-occupied	11,429	60.7%
Renter-occupied	7,387	39.3%
Subtotal	18,816	---
Vacant Units:		
For rent	177	3.7%
Rented, not occupied	123	2.6%
For sale only	339	7.1%
Sold, not occupied	96	1.9%
For seasonal, recreational, or occasional use	3499	72.8%
For migrant workers	0	0%
Other vacant	570	11.9%
Subtotal	4,804	---
Total Units	23,620	100%
Vacancy Rate:		
Homeowner vacancy rate	2.9%	
Rental vacancy rate	2.3%	

Source: American Community Survey 5-Year Estimates Data Profiles, 2019, Tables DP04 and B25004

## Housing Costs and Affordability

### Home Values

The following table compares median housing values in Coachella Valley cities from 2013 to 2019. Cathedral City's median housing value was \$179,500 in 2013, which was higher than Desert Hot Springs and Coachella, but lower than the other cities. Its median value increased nearly 56% over the 6-year period, which was the third highest percent increase in the region. However, it still ranks third lowest in the Coachella Valley.

**Table 18**  
**Regional Median Housing Value Trends, 2013 - 2019**

Jurisdiction	Median Value, owner-occupied units		% Change 2013-2019
	2013	2019	
Coachella	\$137,600	\$219,400	59.4%
Desert Hot Springs	\$121,600	\$194,500	59.9%
<b>Cathedral City</b>	<b>\$179,500</b>	<b>\$279,500</b>	<b>55.7%</b>
Palm Springs	\$267,800	\$389,800	48.9%
Indio	\$192,600	\$281,400	46.1%
Indian Wells	\$604,600	\$722,500	19.5%
La Quinta	\$348,400	\$398,200	14.3%
Palm Desert	\$308,000	\$350,400	13.8%
Rancho Mirage	\$518,000	\$498,700	-3.7%

Source: American Community Survey 5-Year Estimates Data Profiles 2013 and 2019, Table B25077.

Cities organized by highest to lowest percent change.

### Rental Costs

The rental housing market in Cathedral City includes apartments, duplexes, townhomes, mobile homes, and single-family homes. **Table 19** shows median gross rent by number of bedrooms, according to the American Community Survey. The median gross rent is \$1,193.

**Table 19**  
**Median Gross Rent by Bedrooms**

No. of Bedrooms	Median Gross Rent*
No bedroom	\$912
1 bedroom	\$700
2 bedrooms	\$1,147
3 bedrooms	\$1,461
4 bedrooms	\$1,543
5+ bedrooms	not provided
<b>Median Gross Rent:</b>	<b>\$1,193</b>

\* Estimated, renter-occupied housing units paying cash rent  
Source: American Community Survey 5-Year Estimates, 2019. Table B25031

Online listings show that current (2020) market rental rates range from approximately \$1,100 to \$1,200 for a studio apartment; \$1,100 to \$1,400 for a 1-bedroom unit; \$1,300 to \$1,600 for a 2-bedroom unit; \$1,800 to \$2,500 for a 3-bedroom unit; and \$1,700 to \$4,000 and higher for a 4+-bedroom unit.<sup>6</sup>

*Affordability*

Housing costs can represent a major obstacle to housing availability. Federal and State governments offer housing assistance programs and establish maximum income limits for eligibility for those programs, as well as maximum housing costs that can be charged to eligible households. Housing affordability is determined by the ratio of income to housing costs. As shown in the table below, the area median income (AMI) for a family of four in Riverside County is \$75,300 for Fiscal Year 2020.

**Table 20  
Income Limits for Riverside County, 2020**

Income Category	Number of Persons in Household							
	1	2	3	4	5	6	7	8
Extremely Low Income	\$15,850	\$18,100	\$21,720	\$26,200	\$30,680	\$35,160	\$39,640	\$44,120
Very Low Income	\$26,400	\$30,150	\$33,900	\$37,650	\$40,700	\$43,700	\$46,700	\$49,700
Low Income	\$42,200	\$48,200	\$54,250	\$60,250	\$65,100	\$69,900	\$74,750	\$79,500
<b>Median Income</b>	\$52,700	\$60,250	\$67,750	<b>\$75,300</b>	\$81,300	\$87,350	\$93,350	\$99,400
Moderate Income	\$63,250	\$72,300	\$81,300	\$90,350	\$97,600	\$104,800	\$112,050	\$119,250

Source: Department of Housing and Community Development, State Income Limits for 2020.

**Table 21** describes income limits for commonly used household income categories and “affordable” monthly payments for each category, according to definitions set forth in California Health and Safety Code Sections 50052.5 and 50053. Income limits are based on the AMI for Riverside County (\$75,300 for Fiscal Year 2020). An affordable housing payment is considered to be no more than 30% of a household’s gross income. For rental units, this includes rent plus utilities. Assuming that a potential homebuyer within each income group has acceptable credit, a typical down payment (5% to 10%), and other housing expenses (taxes and insurance), the maximum affordable home price can be estimated for each income group.

<sup>6</sup> Rent.com, accessed April 28, 2020.

**Table 21  
Income Categories and Affordable Housing Costs**

<b>Income Category<sup>1</sup></b>	<b>Income Limit<sup>2</sup></b>	<b>Affordable Monthly Payment</b>	<b>Maximum Affordable Home Purchase Price<sup>3</sup></b>
Extremely Low Income (0-30% of AMI)	\$26,200	\$655	\$85,100
Very Low Income (30%-50% of AMI)	\$37,650	\$941	\$122,200
Low Income (50%-80% of AMI)	\$60,250	\$1,506	\$195,600
Moderate Income (80%-120% of AMI)	\$90,350	\$2,259	\$293,400
Above Moderate Income (120%+ of AMI)	\$90,350+	\$2,259+	\$293,400+

Source: Department of Housing and Community Development, State Income Limits for 2020.

<sup>1</sup> AMI = area median income. Riverside County median income = \$75,300.

<sup>2</sup> Based on 4-person household.

<sup>3</sup> Converts the maximum affordable monthly payment to a home value, assuming 10% down, 15-year fixed loan, 4.0% interest rate, 1.25% taxes and homeowners insurance monthly.

Based on the affordable housing guidelines shown in the table above, an affordable monthly housing payment for a low-income family of four (\$1,506) exceeds the median gross rent for a 3-bedroom unit in Cathedral City (\$1,461). Therefore, rental housing affordability is not considered a barrier for lower income households. In regard to homeownership, an affordable home purchase price for a low-income family of four (\$195,600) is less than the median housing value in Cathedral City (\$279,500). Low-income households could face challenges achieving homeownership; therefore affordability of ownership units should be an important consideration in Cathedral City. Conversely, a moderate income household can afford market rentals and home purchases without subsidy.

The City refers residents needing housing affordability assistance to the Housing Authority of the County Riverside (HACR), which provides HUD Section 8 rental assistance to lower income renters and operates low-income housing projects in Cathedral City. Homeownership assistance loans are also available at the County and State levels (see Existing Affordable Housing Programs, below). The City’s Zoning Ordinance offers density bonuses and other development-related incentives and concessions to encourage the development of affordable.

**Overpayment**

Overpayment is defined as a household paying more than 30% of its gross income toward housing costs. Severe overpayment occurs when a household pays more than 50% of its gross income on housing. The cost burden of overpayment can fall disproportionately on lower-income households and renters.

The Comprehensive Housing Affordability Strategy (CHAS) database, provided by HUD and based on U.S. Census American Community Survey data, describes the number of households, by income level, that are experiencing housing cost burdens. The latest CHAS data for the 2013-2017 period for Cathedral City are shown in the following table. Of all owner households, 39.4% are overpaying for housing, and 20.4% are severely overpaying. The percentages are higher when analyzing lower-income households as a group. Of all lower-income owner households, 70.4% are overpaying, and 46.1% are severely overpaying. Although rental housing, as described above, can be affordable to lower income households in the City, there is still an overpayment issue with

these households. It must be noted that there is not a direct relationship between the stated rental rates in Table 19, and the households overpaying in Table 22.

The patterns are similar for renter households. Of all renter households, 56.1% are overpaying, and 28.5% are severely overpaying. Percentages are higher for low-income households as a group. Of all lower-income renter households, 75.1% are overpaying, and 41.5% are severely overpaying.

**Table 22**  
**Overpayment by Income Level**

Income Category <sup>1</sup>	Owners		Renters	
	Households	Percent	Households	Percent
Household Income less than or = 30% HAMFI:	1,130		1,690	
Households overpaying	810	71.7%	1,165	68.9%
Households severely overpaying	780	69.0%	1,045	61.8%
Household Income >30% to less than or = 50% HAMFI:	1,285		1,325	
Households overpaying	1,010	78.6%	1,040	78.5%
Households severely overpaying	695	54.1%	585	44.1%
Household Income >50% to less than or = 80% HAMFI:	1,995		1,840	
Households overpaying	1,285	64.4%	1,440	78.3%
Households severely overpaying	560	28.1%	385	20.9%
<b>Subtotal: All lower-income households</b>	<b>4,410</b>		<b>4,855</b>	
<b>Subtotal: All lower-income HH overpaying</b>	<b>3,105</b>	<b>70.4%</b>	<b>3,645</b>	<b>75.1%</b>
<b>Subtotal: All lower-income HH severely overpaying</b>	<b>2,035</b>	<b>46.1%</b>	<b>2,015</b>	<b>41.5%</b>
Household Income >80% to less than or = 100% HAMFI:	1,185		750	
Households overpaying	565	47.7%	220	29.3%
Households severely overpaying	130	11.0%	10	1.3%
Household Income >100% HAMFI:	5,165		1,520	
Households overpaying	570	11.0%	129	8.5%
Households severely overpaying	35	0.7%	4	0.3%
<b>Total Households</b>	<b>10,760</b>		<b>7,125</b>	
<b>Total Households Overpaying</b>	<b>4,240</b>	<b>39.4%</b>	<b>3,994</b>	<b>56.1%</b>
<b>Total Households Severely Overpaying</b>	<b>2,200</b>	<b>20.4%</b>	<b>2,029</b>	<b>28.5%</b>

<sup>1</sup> HAMFI = HUD Area Median Family Income

“Overpaying” is defined as spending >30% of gross household income on housing costs.

“Severely overpaying” is defined as spending >50% of gross household income on housing costs.

Source: U.S. Dept. of Housing and Urban Development, CHAS data for Cathedral City, based on 2013-2017 ACS.

The County Housing Authority’s (HACR) provides rental assistance through the Section 8 Housing Choice Voucher program, which helps reduce the burdens of overpayment for lower income households (see Existing Affordable Housing Programs, below).

#### **Extremely Low-Income Households**

Extremely low-income (ELI) households are a subset of the very low-income household category and defined by HCD as those with incomes less than 30% of the area median income (AMI). The AMI for a 4-person household in Riverside County is \$75,300. ELI household incomes are

defined by HCD and HUD as those earning less than \$26,200.<sup>7</sup> Many ELI households receive public assistance, such as Social Security insurance, and have a variety of housing needs.

*Existing Needs*

According to the latest CHAS data, 2,820 households (15% of total households (18,816)) in Cathedral City are considered extremely low-income. Most (60%) ELI households are renters. More than 73% experience housing problems, including incomplete kitchen and plumbing facilities, overcrowding, and/or cost burden greater than 30% of income (overpayment). Approximately 70% are in overpayment situations, and 64.7% are in severe overpayment situations in which housing costs are greater than 50% of household income.

**Table 23  
Housing Problems for Extremely Low-Income Households**

	<b>Owners</b>	<b>Renters</b>	<b>Total</b>
Total Number of ELI Households	1,130	1,690	2,820
Percent with any housing problems*	75.6%	72.3%	73.6%
Percent with Cost Burden >30% of income	71.7%	68.9%	70.0%
Percent with Cost Burden >50% of income	69.0%	61.8%	64.7%
Total Number of Households	10,760	7,125	17,885

\*Housing problems include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room (overcrowding), and cost burden greater than 30% of income.

Source: U.S. Department of Housing and Urban Development, CHAS data for Cathedral City, based on the 2013-2017 ACS.

*Projected Needs*

To calculate projected housing needs, the City assumed 50% of its very low-income regional housing need assessment (RHNA) are extremely low-income households. As such, from its very low income need of 538 units, the City has determined a projected need of 269 units for extremely low-income households.

Housing types that are available and suitable for ELI households include rent-restricted affordable units, housing with supportive services, and housing with rent subsidies (vouchers). The County Housing Authority’s HACR manages public housing and provides rental assistance through the Section 8 Housing Choice Voucher program. Additionally, the City’s Zoning Ordinance supports the development of secondary dwelling units, supportive and transitional housing, and group homes.

**Overcrowding**

Residential overcrowding has been associated with a higher prevalence of infectious disease, stress, sleep disorders, and other mental health problems, as well as lower educational achievement and vulnerability to homelessness. Overcrowding can indicate an imbalance between housing affordability and income and typically affects renters more than homeowners.

<sup>7</sup> Per HUD, the Extremely Low Income (ELI) income limit is the greater of either: 1) 60% of Very Low Income limit (\$37,650), which equals \$22,590, or 2) poverty guideline established by Dept. of Health and Human Services (HHS), which equals \$26,200.

Overcrowding is defined by the U.S. Census as a housing unit with more than one person per room (excluding kitchens, bathrooms, hallways, etc.). According to this definition, Cathedral City has 1,663 overcrowded housing units, which represents 8.8% of the total 18,816 occupied units in the City. Of overcrowded units, 71.5% are renter-occupied units and 28.5% are owner-occupied units.

Severely overcrowded units have more than 1.5 persons per room and are a subset of overcrowded units. Nearly 40% of all overcrowded units in the City are severely overcrowded. About 70.7% of them are renter-occupied units, and 29.3% are owner-occupied units.

**Table 24  
Overcrowding**

Persons Per Room	Owner-Occupied Units	Renter-Occupied Units	Total	% of Total
1.01 to 1.50	271	698	969	58.3%
1.51 to 2.00	144	329	473	28.4%
2.01 or more	59	162	221	13.3%
Total Overcrowded	474	1,189	1,663	100.0%
% Overcrowded by Tenure	28.5%	71.5%	---	---
Total Severely Overcrowded	203	491	694	39.8%
% Severely Overcrowded by Tenure	29.3%	70.7%	---	---

Source: American Community Survey 5-Year Estimates Data Profiles, 2019, Table B25014.

Overcrowding can occur for multiple reasons, not all of them economic. In Cathedral City, where almost 60% of the population identifies as Hispanic/Latino, for example, multi-generational households are not uncommon, and the need for larger units, or flexibility in providing accessory units or second dwelling units must be considered. Cathedral City’s Development Code allows the development of second dwelling units that provide additional living facilities for one or more persons on lots with a primary residence. Second dwelling units can help alleviate overcrowding in owner-occupied units.

**Publicly-Supported Housing**

Cathedral City does not have any publicly-supported housing units at this time.

**SPECIAL POPULATIONS**

This Section addresses those households or segments of the population that may have identifiable special housing needs because of occupation, income, health, or physical challenges.

**Seniors**

Senior residents ages 65 and older are considered a special population because they typically live on fixed or limited incomes, have an increased incidence of physical and memory impairments

that can adversely affect independent living, and have higher health care costs. Potential housing problems can include lack of accessibility or independent living support services, lack of affordability, lack of transportation options, and inconvenient distance to appropriate health care facilities.

As shown in the following table, 5,671 households (30.1% of all households) in Cathedral City are 65 years or older. Senior households make up (36.6%) of all owner-occupied households and 20.1% of all renter-occupied households.

**Table 25**  
**Senior Households by Tenure**

Householder Age	Owner-Occupied		Renter-Occupied	
	Households	%	Households	%
<b>Non-Senior Households</b>				
Under 65 years	7,243	63.4%	5,902	79.9%
<b>Senior Households</b>				
65 to 74 years	2,400	21.0%	871	11.8%
75 to 84 years	1,410	12.3%	509	6.9%
85 years and over	376	3.3%	105	1.4%
Subtotal, Senior Households	4,186	36.6%	1,485	20.1%
Total Households	11,429	100%	7,387	100%

Source: American Community Survey 5-Year Estimates, 2019. Table B25007

According to the American Community Survey, an estimated 1,498 seniors have incomes below the poverty level, which represents 16.2% of all seniors in the City (9,261). The 2020 federal poverty guideline for one person is \$12,760 annually. The major source of income for most seniors is Social Security, and the average Social Security monthly benefit is \$1,503,<sup>8</sup> which is \$18,036 annually. Therefore, a single senior paying 30% of their monthly Social Security income on housing costs would pay \$451 toward housing costs. However, Cathedral City median rents are \$615 for a one-bedroom unit. A two-person senior household would have \$902 available for housing costs, but median rents are \$1,122 for a 2-bedroom unit. Therefore, Social Security alone cannot adequately cover affordable housing costs in the City.

**Table 26**  
**Senior Incomes Below the Poverty Level**

Age Group	Income in Past 12 Months Below Poverty Level
	No. of Residents
65 to 74 years	740
75 years and over	758
Total	1,498

Source: American Community Survey 5-Year Estimates, 2019. Table B17001

<sup>8</sup> Social Security Administration Fact Sheet, December 2019 Beneficiary Data.

Numerous senior support services are provided by various organizations, including those listed in the following table. There are also numerous privately-operated assisted living facilities and home care service providers in the City and Coachella Valley.

**Table 27**  
**Senior Resources**

<b>Organization</b>	<b>Services Provided</b>
Assisted living and home care providers (various private providers)	Housing, personal care, health care, housekeeping, meals
Braille Institute Coachella Valley Neighborhood Center	Rehabilitation, enrichment classes, in-home support for the visually impaired
Cathedral City Senior Center	Health/fitness programs, social events, classes, homebound outreach, food distribution
Eisenhower Memory Care Center	Adult day center for neuro-cognitive impairments
FIND Food Bank	Food distribution
Hidden Harvest	Food distribution
Jewish Family Services of the Desert	Advocacy, case management services
Riverside County Office On Aging	Medical case management, counseling, transportation assistance, meals
Salvation Army	Food distribution, social events, community programs
Senior Advocates of the Desert	Public benefits and social services assistance, emergency financial assistance
SunLine Transit Agency	For seniors and disabled residents: Half-Fare Program, Taxi Voucher Program, SunDial paratransit service, bus travel training

Housing types considered appropriate for seniors include apartments, townhomes, duplexes, mobile homes, second units (granny flats), congregate housing with group dining facilities and support services, and assisted living facilities. In Cathedral City, subsidized rental housing for seniors is provided at the following complexes: Cathedral Palms Apartments, Casa Victoria Apartments, Casa San Miguel de Allende, Heritage Park Apartments, Mountain View Apartments, Park David Apartments, and Tierra Del Sol.

**People with Disabilities**

A “disability” is a physical or mental impairment that substantially limits one or more major life activities. People with disabilities can face unique housing challenges, including lack of affordable units due to fixed or limited incomes, lack of accessible design features such as barrier-free access, lack of in-home supportive medical services, and lack of transportation options and proximity to medical facilities.

There are an estimated 6,433 non-institutionalized residents with a disability in Cathedral City (11.8% of the total City population). Individuals may be affected by one or more types of disability. **Table 28** describes the number and types of disabilities affecting the population, by age group. As shown, there are 13,355 disabilities affecting the population. The most affected age groups are 65 years and over (52.5%) and 18 to 64 years (40.8%). The most prevalent disabilities are ambulatory difficulties and independent living difficulties.

**Table 28**  
**Disabilities by Age and Type**

<b>Disability by Age and Type</b>	<b>Number of Disabilities</b>	<b>% of Total Disabilities</b>
<b>Under Age 18 years</b>		
With a hearing difficulty	187	1.4%
With a vision difficulty	230	1.7%
With a cognitive difficulty	345	2.6%
With an ambulatory difficulty	47	0.3%
With a self-care difficulty	75	0.6%
With an independent living difficulty	*	*
Subtotal	884	6.6%
<b>Age 18 to 64 years</b>		
With a hearing difficulty	622	4.7%
With a vision difficulty	613	4.6%
With a cognitive difficulty	1,019	7.6%
With an ambulatory difficulty	1,447	10.8%
With a self-care difficulty	698	5.2%
With an independent living difficulty	1,058	7.9%
Subtotal	5,457	40.8%
<b>Age 65 years and over</b>		
With a hearing difficulty	1,380	10.3%
With a vision difficulty	917	6.9%
With a cognitive difficulty	769	5.8%
With an ambulatory difficulty	1,781	13.3%
With a self-care difficulty	803	6.0%
With an independent living difficulty	1,364	10.2%
Subtotal	7,014	52.5%
<b>Total Disabilities</b>	<b>13,355</b>	<b>100%</b>
<b>Total Non-Institutionalized Population with a Disability</b>	<b>6,433</b>	

Source: American Community Survey 5-Year Estimates, 2019. Table S1810  
\* data not provided

**Developmental Disabilities**

State law also requires that the Housing Element discuss the housing needs of persons with developmental disabilities. A “developmental disability” is defined as a disability that originates before an individual attains 18 years of age; continues, or can be expected to continue indefinitely; and constitutes a substantial disability for that individual.<sup>9</sup> Developmental disabilities include intellectual disabilities, cerebral palsy, epilepsy, autism, and related conditions.

**Commented [KC1]:** Section added/expanded upon per HCD letter item B6 *Persons with Developmental Disabilities*.

<sup>9</sup> California Welfare and Institutions Code Section 4512(a).

The Census does not record developmental disabilities. According to the U.S. Center for Disease Control and Prevention (CDC) Developmental Disabilities department, approximately 17 percent of children between ages 3 and 17 have one or more developmental disabilities.<sup>10</sup> This equates to 2,350 persons under the age of 18 in the City of Cathedral City with developmental disabilities, based on 2019 ACS population estimates.

The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities by zip code. The DDS data indicates that approximately 307 developmentally disabled persons reside in the City's primary zip code 92234, 159 of which are under the age of 17 and 148 are 18 years or older. Of these persons, 207 live at home with a parent or guardian, 33 have special housing needs (independent living or care facilities) and the remaining were unspecified.<sup>11</sup>

Many developmentally disabled persons can live and work independently within a conventional housing environment; however, more severely disabled individuals require a supervised group living environment or an institutional environment where medical attention and physical therapy are provided. The cost of housing is a greater concern for those with severe physical or mental disability because often the disability prevents individuals from working which limits their opportunities for job advancement, and thereby limits their income. Many of the disabled rely solely on Social Security Income, which would typically place them within extremely low- to very low-income categories with market-rate housing unaffordable to these households.

#### Resources and Services

A variety of support services are available to Cathedral City residents with disabilities. Angel View, a non-profit organization headquartered in Desert Hot Springs, operates a Residential Care program that includes 19 six-bed group homes for adults and children with developmental disabilities.<sup>12</sup> Homes are located in Desert Hot Springs, Palm Springs, Thousand Palms, and Joshua Tree. All homes feature wide doorways, roll-in showers, and other design modifications, and all meet affordable housing requirements. One home is designed for individuals with intellectual disabilities and complex medical conditions, and one is a licensed Congregate Living Health Facility for ventilator-dependent individuals with muscular dystrophy. Angel View also operates a therapeutic day program and outreach program.

The Inland Regional Center (IRC) provides support to people with intellectual disabilities, autism, cerebral palsy, and epilepsy. Support services include day programs, independent and supported living services, family support, educational advocacy, and employment assistance. Desert Arc provides independent living skills programs for adults with intellectual and developmental disabilities, as well as employment, sports and recreation, and other support services. The Braille Institute Coachella Valley Neighborhood Center, formerly in Rancho Mirage, opened in 2020 in Palm Desert and provides low vision rehabilitation, daily living skills, enrichment classes, and in-home support for the visually impaired. The Riverside County Office on Aging provides case

<sup>10</sup> CDC. 2019. Facts About Developmental Disabilities. <https://www.cdc.gov/ncbddd/developmentaldisabilities/facts.html> . Accessed August 2021.

<sup>11</sup> DDS. 2021. Consumer County by California Zip Code and Residence Type, Regional Center and Early Start Consumers For the end of June 2021. Accessed August 2021.

<sup>12</sup> [angelview.org/residential-care](http://angelview.org/residential-care)

management, social engagement and outreach services, meal programs, and health care support services for adults with disabilities and seniors. SunLine Transit Agency offers SunDial origin-to-destination paratransit service, Half-Fare Program, Taxi Voucher Program, and bus travel training for people with disabilities.

Housing types that can accommodate people with disabilities include wheelchair accessible units, such as ground floor or single-story units with lowered countertops, roll-in showers, and widened doorways. For those with independent living difficulties, group homes or units with onsite residential assistance may be required for support with housekeeping, medication management, shopping, or transportation. Those with severe disabilities may require intensive 24-hour medical care. Housing affordability is a major concern as many disabled individuals have limited abilities to work and therefore live on fixed or limited incomes.

In Cathedral City, Casas San Miguel de Allende apartments includes 48 units that are restricted to individuals with special needs or long-term disabilities. Mountain View Apartments are restricted to seniors age 62+ or disabled individuals (all ground level units).

The City adheres to State guidelines regarding disabled access and promotes the use of principals of architectural design which aid the disabled. The Americans with Disabilities Act (ADA) requires all new multi-family construction to include a percentage of units be accessible to disabled persons. The City of Cathedral City monitors and requires compliance with these standards as part of the building permit review, issuance, and inspection process.

The City imposes no special requirements or prohibitions on the development of housing for disabled persons beyond the requirements of the Americans with Disabilities Act. There is no concentration restriction for residential care homes. State and federal law does not permit the City to regulate group homes of 6 or fewer residents. Group homes of 7 or more residents are permitted with approval of a conditional use permit in the R-2, R-3, R-M and R-H zones. The City has also adopted procedures for providing reasonable accommodation for persons with disabilities.

Per the Federal Fair Housing Amendments Act of 1988, the California Fair Employment and Housing Act, and California Administrative Code Title 24, the City provides all people with disabilities reasonable accommodations in certain residential development standards (Development Code Section 9.104). Any person with a disability may submit an application for accommodations in the City's residential development standards by submitting an application to the city planner or his or her designee on a form provided by the city. The Cathedral City Development code provides for transitional and supportive housing, supportive housing, long term care facilities, convalescent facilities, and group homes that can serve the housing needs of individuals with disabilities.

#### **Large Families**

Large households are defined as those with 5 or more people. Large households can have difficulty finding affordable housing with sufficient bedrooms, which can lead to overcrowding and severe overcrowding.

As shown in the following table, there are 2,805 large households in Cathedral City, or 15.6% of all households. Of all large households, 1,371 (48.9%) are owners and 1,434 (51.1%) are renters.

**Table 29**  
**Household Size, by Tenure**

Household Size	Owner-Occupied Units		Renter-Occupied Units	
	Number	Percent	Number	Percent
1 person	3,101	28.2%	2,124	30.4%
2 persons	3,970	36.1%	1,309	18.8%
3 persons	1,199	10.9%	1,028	14.7%
4 persons	1,362	12.4%	1,086	15.6%
<b>5 persons</b>	<b>848</b>	<b>7.7%</b>	<b>925</b>	<b>13.3%</b>
<b>6 persons</b>	<b>215</b>	<b>1.9%</b>	<b>263</b>	<b>3.7%</b>
<b>7 persons or more</b>	<b>308</b>	<b>2.8%</b>	<b>246</b>	<b>3.5%</b>
Total Households	11,003	100%	6,981	100%
Total Households with 5+ Persons	1,371	12.4%	1,434	20.5%

Source: American Community Survey 2014-2018 5-Year Estimates, Table B25009

To avoid overcrowding, suitable housing products for large families include those with 4 or more bedrooms. As shown in the following table, there are 2,914 units with 4 or more bedrooms, which exceeds the current number of large households. Despite the number of 4-bedroom dwelling units in the current housing stock, 1,663 units (8.8% of all units citywide) are overcrowded, and seventy percent (71.5%) of them are rental units. There are 199 units with 5 or more bedrooms (1% of total units citywide), and only 9 of them are rental units. Currently, there are 570 large family households renting, indicating there is a need for additional units with 5 or more bedrooms, particularly rental units.

**Table 30**  
**Number of Bedrooms, by Tenure**

No. of Bedrooms	Owner-Occupied Units		Renter-Occupied Units		Total Occupied Units	
	Number	Percent	Number	Percent	Number	Percent
0 bedrooms	97	0.9%	520	7.0%	617	3.0%
1 bedroom	291	2.5%	1,225	16.6%	1,516	8.1%
2 bedrooms	2,887	25.3%	2,496	33.8%	5,383	29.5%
3 bedrooms	5,810	50.8%	2,576	34.9%	8,386	42.8%
4 bedrooms	2,154	18.8%	561	7.6%	2,715	15.6%
5+ bedrooms	190	1.7%	9	0.1%	199	1.0%
Total	11,429	100.0%	7,387	100.0%	18,816	100.0%

Source: American Community Survey 5-Year Estimates, 2019. Table B25042

Suitable housing products for large families include those with sufficient bedrooms near childcare facilities, schools, recreational areas, and public transit. Given the lack of larger rental units, programs that assist large families with homeownership would also be beneficial. Reduced parking standards for units with 5 or more bedrooms may also incentivize development of larger rental units.

**Female-Headed Households**

Female-headed households generally have lower incomes, higher rates of poverty, and lower home ownership rates. Income constraints can result in overpayment and severe overpayment, in which housing costs exceed 30% or 50%, respectively, of household income.

As shown in **Table 12**, there are 9,271 single-parent-headed family households in Cathedral City, or 49.3% of all households. Male-headed family households comprise 23.0% of all households, and female-headed family households comprise 26.3%. As shown in the following table, there are 4,952 female-headed family households in Cathedral City. Approximately 20% of the female-headed households have children under age 18, and approximately 32.8% of all families with incomes below the poverty level are female-headed households.

**Table 31  
Female-Headed Household Characteristics**

	Number	Percent
Total Households	18,816	100.0%
Female-Headed Households	4,952	23.3%
Female-Headed Households with own children under 18	975	---
Female-Headed Households without Children under 18	3,977	---
Total Families, Income in the Past 12 Months Below Poverty Level	1,494	100.0%
Female Householders, Income in the Past 12 Months Below Poverty Level	490	32.8%

Source: American Community Survey 5-Year Estimates, 2019. Table DP02; Table K201703

Primary housing needs for this special population include affordability and units of appropriate size for the age and gender mix of children. Other considerations include proximity to schools, childcare facilities, recreation areas, and other family services and amenities. Flexible educational programs and job training services can help householders obtain higher paying jobs. The County of Riverside offers affordable housing assistance, such as Section 8 housing vouchers, to eligible residents in the City (see Existing Affordable Housing Programs, below).

**Farm Workers**

Agricultural production is a valuable component of the Coachella Valley economy. However, most agricultural land and farmworker housing is located in the eastern valley in and around the communities of Coachella, Thermal, and Mecca, more than 20 miles from Cathedral City. Cathedral City’s General Plan and zoning maps do not designate land for agricultural uses, and there are no zoning policies or restrictions specific to farms or farmworker housing. The exception to this is the cannabis industry, which involves the cultivation of medical and adult-use marijuana within the City limits. Several City ordinances address the siting, operation, and regulation of cannabis businesses, but none address employee or farmworker housing because cannabis workers do not live in organized or designated group quarters.

According to the US Department of Agriculture (USDA), in its 2017 Census of Agriculture, there were 11,365 farmworkers in Riverside County.<sup>13</sup> Of those farm workers, 5,758 (50.6%) were considered permanent workers (worked 150 or more days per year) and 5,607 (49.4%) were considered seasonal workers (worked less than 150 days per year).

**Commented [KC2]:** Added per HCD comment letter item B6 *Farmworkers*

<sup>13</sup> [USDA 2017 Census of Agriculture, Table 7. Hired Farm Labor – Workers and Payroll: 2017.](#)

In the Coachella Valley, there are a total of approximately 8,000 farmworkers, 2,400 of which live in the City of Coachella. The balance live in the communities of Mecca and Thermal, close to the agricultural operations at which they work. According to the American Community Survey (ACS), 164 Cathedral City residents were employed in the “agriculture, forestry, fishing, hunting, mining” industry in 2019, which represents 0.7% of the civilian employed work force.<sup>14</sup> Community-specific USDA data was not available; however, consistent with county-wide trends, it is assumed that the residents in the agricultural industry are evenly split between seasonal and permanent farm worker, or 82 farm workers each.

Farm worker households generally fall into low and very low-income categories. The principal housing options for migrant and local seasonal farm workers are family-owned homes, private rental houses, second units, apartments, and mobile homes. Cathedral City is more than 20 miles from the Valley’s farming industry, which would translate to a 30-to-45-minute commute for a farmworker. Given the low percentage of farm-related workers living in the City and the estimated commute times to their place of work, demand for farmworker housing is considered negligible.

#### **Homeless Persons**

People experiencing homelessness need shelter, either short-term or long-term. Homelessness can have a variety of causes, including a lack of affordable housing in the community, unemployment or reduction in work hours, illness, disability, mental illness, and substance abuse, among others.

The Homeless Point-In-Time (PIT) Count is a federally-mandated annual count of homeless individuals used to evaluate the extent of homelessness. The data provide a snapshot of homelessness on a particular date and time. The 2019 PIT Count for Riverside County determined there were 82 unsheltered homeless individuals in Cathedral City.<sup>15</sup> This is the second highest number of homeless people among the nine Coachella Valley cities behind Palm Springs. It represents a 78% increase over the 2018 PIT Count for Cathedral City (46 individuals). According to the PIT Count report, the significant increase could be partially due to undercounts in 2018 and earlier years and/or changes in counting and surveying methods, such as increased coverage by more volunteers, that were implemented in 2019; however, the increase may also be due to actual increases in homelessness and a lack of available affordable housing. As described in **Table 32**, the majority of homeless people in Cathedral City are white (62%), non-Hispanic (46%), male (74%), and adults over 24 years (93%).

<sup>14</sup> American Community Survey 5-Year Estimates, 2019. Table S2405.

<sup>15</sup> 2019 Riverside County Homeless Point-In-Time Count and Survey Report, County of Riverside Department of Public Social Services, page 46.

**Table 32  
Cathedral City Homeless Characteristics**

	<b>Number</b>	<b>Percent of Total</b>
<b>Race</b>		
White	51	62%
Unknown Race	16	20%
American Indian	6	7%
Multiple Races	4	5%
Asian	3	4%
Black	2	3%
Native Hawaiian	0	0%
<b>Ethnicity</b>		
Non-Hispanic	38	46%
Hispanic	31	38%
Unknown Ethnicity	13	16%
<b>Gender</b>		
Male	61	74%
Female	20	24%
Gender Non-Conforming	1	1%
<b>Age</b>		
Adults (>24 yrs)	76	93%
Youth (18-24 yrs)	4	5%
Children (<18 yrs)	0	0%
Unknown age	2	2%

**TOTAL HOMELESS INDIVIDUALS = 82**

Source: 2019 Riverside County Homeless Point-In-Time Count and Survey Report, County of Riverside Department of Public Social Services, page 46.

Particularly sensitive homeless subpopulations include veterans, the chronically homeless, those with mental health conditions and physical disabilities, victims of domestic violence, and others. As shown in the following table, of the 51 homeless individuals interviewed in Cathedral City, 34% were chronically homeless, 28% had substance abuse issues, 22% had mental health conditions, and 20% had PTSD. Some subpopulations could be higher, but the extent is unknown because 31 individuals could not be interviewed for various reasons, including refusal to participate, sleeping, language barrier, inability to respond, physical barriers, or unsafe site conditions.

**Table 33  
Homeless Subpopulations**

<b>Subpopulation</b>	<b>Number<sup>1</sup></b>	<b>Percent of Total Homeless Individuals</b>
Veterans	2	2%
Chronically Homeless	28	34%
Substance Abuse	23	28%
PTSD	16	20%
Mental Health Conditions	18	22%
Physical Disability	14	17%
Developmental Disability	3	4%
Brain Injury	9	11%
Victim of Domestic Violence	5	6%
AIDS or HIV	7	9%
Jail release, past 12 months	13	16%

<sup>1</sup> Results of interviews with 51 homeless individuals. Actual numbers may be higher as 31 individuals were not interviewed.

Source: 2019 Riverside County Homeless Point-In-Time Count and Survey Report, County of Riverside Department of Public Social Services, page 46.

Emergency, transitional, and supportive housing facilities and services can serve some of the short- and long-term needs of homeless individuals. Emergency shelters provide temporary shelter, often with minimal supportive services. Supportive housing is linked to support services intended to improve the individual’s ability to independently live and work in the community. Transitional housing is provided with financial assistance and support services to help homeless people achieve independent living within 24 months. Supportive and transitional housing are often in apartment-style units.

In the Coachella Valley, there are approximately 472 year-round emergency shelter beds, 90 seasonal emergency shelter beds, 15 transitional beds, 20 rapid rehousing beds, and 118 permanent supportive housing beds operated by a variety of organizations, as shown in **Table 34**. Facilities are located throughout the Coachella Valley, from Palm Springs to Indio, and are available to Cathedral City residents. Additional services, including emergency food, rent/mortgage and utility assistance, clothing, and bus passes, are provided by Catholic Charities, Salvation Army, Well in the Desert, and other organizations.

**Table 34  
Coachella Valley Homeless Facilities and Services**

<b>Organization Name</b>	<b>Facility Name</b>	<b>Total Beds</b>
<b>Emergency Shelter</b>		
Coachella Valley Rescue Mission	Overnight shelter (families with children, individuals without children)	251
Coachella Valley Rescue Mission	Overnight shelter (individuals without children)	49

**Table 34  
Coachella Valley Homeless Facilities and Services**

<b>Organization Name</b>	<b>Facility Name</b>	<b>Total Beds</b>
Martha's Village and Kitchen Inc.	Renewing Hope Emergency Shelter	120
Operation Safe House	Desert Emergency Shelter	20
Path of Life Ministries Inc.	CVAG Emergency Shelter Project	12
Shelter from the Storm	Domestic Violence Emergency Shelter	20
County of Riverside, Desert Healthcare District and Foundation <sup>1</sup>	Summer Homeless Survival Program (seasonal emergency cooling centers in Cathedral City, Palm Springs, Desert Hot Springs)	90 (30 in each city)
	Subtotal, year-round	472
	Subtotal, seasonal	90
<b>Transitional Housing</b>		
Operation Safe House	Harrison House (youth, young adults)	15
	Subtotal	15
<b>Rapid Rehousing</b>		
Coachella Valley Rescue Mission	Rapid Re-Housing	5
Coachella Valley Rescue Mission	State-funded Rapid Re-Housing	13
Path of Life Ministries Inc.	CVAG Rapid Re-Housing	2
	Subtotal	20
<b>Permanent Supportive Housing</b>		
Desert AIDS Project	Vista Sunrise Apartments	80
Jewish Family Services	Desert Horizon	18
Jewish Family Services	Desert Vista	40
Jewish Family Services	Permanent Supportive Housing Expansion (new in 2018)	35
Riverside University Health System – Behavioral Health	Behavioral Health – Coachella Valley Permanent Housing	25
	Subtotal	118

Sources: "The Path Forward: Recommendations to Advance an End to Homelessness in the Coachella Valley," Barbara Poppe and Associates, November 27, 2018, Appendix 3.

<sup>1</sup> dhcd.org.

A recent analysis of Coachella Valley homelessness found that emergency shelter and transitional housing are not operating at full capacity; the occupancy rate was 79% in 2018 despite high rates of unsheltered single adults.<sup>16</sup> Lower occupancy may be partially because some beds are reserved for domestic violence victims and youth rather than the general population.

After the closure of Roy’s Desert Resource Center emergency homeless shelter in North Palm Springs in 2017, there was a need for a homeless shelter or navigation center in the western Coachella Valley. The Coachella Valley Association of Governments (CVAG), of which Cathedral City is a member, contracted with Path of Life Ministries to operate its Coachella Valley Housing First program that placed people in permanent housing before addressing issues such as joblessness or behavioral health. Program results were positive, with 81% of the 242 people who exited the program in the first year able to find permanent housing, and all participants who exited the program more than doubling their monthly incomes.<sup>17</sup> In late 2019, CVAG initiated an effort to advance the goals of CV Housing First through a collaborative approach called the Coachella Valley Homelessness Engagement & Action Response Team (CVHEART).<sup>18</sup> The program is expected to establish a formal structure for regional homelessness policies and programs, identify funding opportunities for future projects, and expand multi-agency cooperation and participation. In addition to its own efforts to end homelessness, Cathedral City’s membership in CVAG will assure its continued participation in regional efforts. The City allocates \$103,000 annually toward CVAG’s homelessness prevention and intervention programs. The City also works in partnership with the Riverside County Office of Fair Housing to identify and facilitate innovative housing solutions, such as comprehensively addressing the needs of the homeless, not only in Cathedral City but Valley-wide.

The City currently has two Homeless Liaison Police Officers, both of whom are fully funded, who work with the local homeless community to encourage the transition from outdoor encampments to permanent housing. The officers also help to align the needs of homeless individuals with available local and regional resources.

The City currently allows for emergency shelters and transitional and supportive housing within certain I-1 (Light Industrial) districts, specifically within the P/IH Institutional Housing Overlay District. The Zoning Code also allows transitional and supportive housing as a residential use subject only to the same standards and procedures that apply to other residential uses of the same type in the same zone, in conformance with state law. [Please see Governmental Constraints for further discussion.](#)

**Commented [KC3]:** Program added Discussion added to Governmental Constraints section.

## AFFORDABLE HOUSING PROGRAMS

This section of the Housing Element addresses programs currently available in Cathedral City and the region relating to affordable housing.

<sup>16</sup> “The Path Forward: Recommendations to Advance an End to Homelessness in the Coachella Valley,” Barbara Poppe and Associates, November 27, 2018, page 21.

<sup>17</sup> “CV Housing First Program Evaluation: Examining the Clients Served in the First Year: July 2017 to June 2018,” Health Assessment and Research for Communities, September 2018, page 55.

<sup>18</sup> “CV Heart: A Collaborative and Regional Approach to Homelessness in Coachella Valley,” Greg Rodriguez, January 2020.

### **City and Local Programs**

The following City programs provide housing assistance to eligible residents. The City's Housing Successor Agency and the Planning and Building Department operate programs and strategies for affordable housing. The goal of the assistance programs is to assist in preserving the affordability of owner-occupied primary residences, and to maintain the supply and quality of affordable owner-occupied housing.

#### Self-Help Housing

The Coachella Valley Housing Coalition, private developers, and Habitat for Humanity have previously provided for new single-family homes for very-low- and low-income buyers in Cathedral City. The down-payment for these homes was earned through "sweat equity," which is defined as the recipients' participation in the construction of the home. Loans that are below the market interest rates are available for such buyers.

#### Mobile Home Parks

According to the 2019 operating permits for Mobile Home Parks, there are 2,120 mobile home spaces. Traditionally, mobile home parks have provided affordable housing opportunities, particularly for senior citizens. In Cathedral City all spaces within the existing mobile home parks are under the potential purview of the City's rent control ordinance.

The City allows mobile homes in parks or subdivisions, and on residential lots in the R-2 and R-M zones, subject to Building Code requirements and the conditional use permit (CUP) process.

#### Lift to Rise

Lift to Rise is a non-profit organization in the Coachella Valley that promotes housing stability and economic opportunity through community outreach and strategic planning to reduce rent burden and increase housing stability. This organization encourages joint venture projects (both public and private) to leverage affordable housing applications and provides a number of programs such as gap financing for affordable housing projects, and many others.

### **County Programs**

The City cooperates with numerous County programs to provide rental assistance and to encourage the construction of new affordable housing. The programs discussed below are available to qualified Cathedral City residents.

#### Section 8 Housing Assistance

Housing assistance is offered to low-income families who wish to live in privately-owned multi-family developments that have been rehabilitated or upgraded. Once eligibility is confirmed, the family is given a choice of available sites from which to choose. They are expected to pay between 30% and 40% of their income.

The Riverside County Housing Authority provides HUD Section 8 rental assistance to lower income renters within the City. Since Section 8 vouchers are "portable" the number of households using vouchers in the City fluctuates over time.

Permanent Local Housing Allocation Program (PLHA)

The PLHA program provides a permanent source of funding to local governments in California to help cities implement plans to increase the affordable housing stock. Per SB 2, the Department of Housing and Community Development (HCD) is authorized to allocate 70% of the monies collected by the Building Homes and Jobs Trust Fund. In 2020, HCD issued notice of the availability of approximately \$195 million in PLHA grant funding. The County of Riverside is the agency responsible for allocating PLHA grant funds to the participating cities, including Cathedral City. The City's PLHA funding will be fully allocated for the years 2019-2023. The City's 2019 allocation was \$283,223 and the estimated 5-year allocation total is \$1,699,338. The County intends to use the remaining PLHA funds in two ways: 1) allocate 20% of the funds towards a down payment assistance program to provide loans to qualified low- and moderate-income households to purchase affordable homes; and 2) allocate 80% of the funds for gap financing new construction or rehabilitation of affordable multifamily rental housing units.

EDA Home Repair Programs

The Economic Development Agency (EDA) currently offers two home repair programs: Home Repair Loan Program (HRLP) and Senior Home Repair Grant (SHRG). HRLP provides up to \$10,000 for home repair services in the form of a deferred loan. SHRG provides up to \$6,000 to lower-income homeowners or mobile homeowners of 62 years of age or older to improve or repair their property. Funds can be used for minor repairs and/or one-time major repairs. To be eligible for this program, recipients must own their own home and meet the requirement of the low-income category.

Currently (January 2021), these programs are only offered to select cities and unincorporated areas of the County. Cathedral City is not eligible for these programs at this time.

Neighborhood Stabilization Program (NSP)

The Housing Authority of the County of Riverside (HACR) offers qualified first-time home buyers financial assistance for a down payment and closing costs on a newly purchased home. Assistance is provided to low-moderate income families.

Currently (January 2021), the County does not have funds to support this program.

First Time Home Buyer Down Payment Assistance Program (FTHB)

The Riverside County FTHB Program provides assistance to lower income persons in the purchase of their first home. Assistance may be provided for the down payment in the purchase of a home. The amount of assistance available depends upon the buyer's qualifications and the price of the home. In general, a buyer may only receive what they need, up to 20 % of the purchase price of the home.

Fair Housing Council of Riverside County

The City works with the Fair Housing Council of Riverside County (FHCRC) to provide anti-discrimination services, landlord-tenant mediation, fair housing training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, lead-based paint programs, and other housing related services for City residents.

## State and Federal Programs

### CalHFA First Mortgage Loan Programs

The California Housing Finance Agency (CalHFA) offers a variety of loan programs for low and moderate income first time homebuyers who secure a CalHFA 30-year fixed mortgage.

### CalFHA Downpayment Assistance Program

Moderate-income households may receive a deferred loan of up to the lesser of 3.5% of the purchase price or appraised value of a home, to be applied to the down payment and/or closing costs for the residence, with a cap of \$10,000.

### HomeChoice Program

This State program provides disabled low- and moderate-income households with a low-interest 30-year mortgage for a first-time home.

### California Low-Income Housing Tax Credit Program

This competitive State program provides tax credits to private-sector developers who provide affordable rental units within their projects. The units can consist of all or part of a project, and must meet certain specified criteria. Units must be restricted for a period of at least 55 years.

## **FAIR HOUSING ASSESSMENT**

AB 686 requires that all housing elements due on or after January 1, 2021, must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

The California Fair Employment and Housing Act generally prohibits housing discrimination with respect to race, color, religion, sex, gender, gender identity, gender expression, marital status, national origin, ancestry, familial status, source of income, disability, genetic information, or veteran or military status. Under state law, AFFH means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Per the California Fair Employment and Housing Act, the City has an agreement with the County of Riverside to provide anti-discrimination, landlord-tenant mediation, fair housing training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, and other housing related services for Cathedral City residents. Services are designed to implement fair housing policies and procedures and to provide information concerning fair housing rights and minority rights under existing fair housing laws, which include providing housing opportunities for all persons regardless of race, color, religion, sex, gender, gender identity, gender expression, marital status, national origin, ancestry, familial status, source of income, disability, source of income, genetic information, or veteran or military status. AB 686 requires the City to certify that it will affirmatively further fair housing by taking meaningful actions to overcome patterns of segregation and foster inclusive communities.

**Commented [KC4]:** New AFFH Section, not in track changes but entire section is new.

The City has completed the following:

1. Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes (applies to housing elements beginning January 1, 2019).
2. Conduct an Assessment of Fair Housing, which includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.
3. Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.

A. Outreach

2016 Outreach

The City prepared an Assessment of Fair Housing (AFH) in 2016. The purpose of the AFH is to provide HUD program participants “with an effective planning approach to aid them in taking meaningful actions to overcome “fair housing issues” such as historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.” A “fair housing issue” is defined as “a condition that restricts choice or access to opportunity, including:

- Ongoing local or regional segregation, or lack of integration.
- Racial or ethnic concentrations of poverty.
- Significant disparities in access to opportunity.
- Disproportionate housing needs based on the “protected classes” of race, color, national origin, religion, sex, familial status, or disability.
- Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.

The City consulted with public and private departments; social service agencies; and other non-profit organizations to review potential issues to fair housing choice in the public and private sector. A total of fifty-six agencies servicing Cathedral City and greater Riverside County were invited to participate in the process. The Fair Housing Assessment report (Appendix [D](#)) documents the issues and concerns raised by residents, housing professionals and service providers during the public participation process.

Cathedral City residents and public and private agencies either directly or indirectly involved with fair housing issues in Cathedral City were invited to participate in two community advisory committee meetings. The first meeting was held on June 30, 2016, at the City’s public library, and the second was held on July 11, 2016, at the Boys and Girls Club of Cathedral City. The meetings provided the opportunity for the Cathedral City community to gain awareness of fair housing laws and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and e-mail, if available, to

agencies and organizations that serve the low- and moderate-income and special needs community. Meeting times and dates were placed in Cathedral City's newspaper in both English and Spanish and posted at City Hall and the Cathedral City branch of the County Library. The City also used social media platforms such as Facebook, to ensure the broadest possible community communication. Lastly, the city targeted the neighborhoods of Dream Home and South City to host two community meetings, which are located within the City's Low-Moderate Census tracts. Hosting community meetings in these areas were important to the City's objective of encouraging participation from populations that are typically underrepresented in the planning process. Due to extensive outreach efforts, attendance at the public meetings included several service providers and citizen groups that work with residents considered a protected class according to HUD's definition. These community members and service providers supplied first-hand insight into fair housing issues and concerns.

The City also held a focus group on July 7, 2016 to provide fair housing advocates and providers within the community a forum to express their views on the fair housing needs of special groups and the community at large. The focus group was open to all interested community stakeholders. Several organizations were invited directly, including Angel View, Roy's Desert Resource Center, Inland Fair Housing and Mediation Board, Cathedral Center, and City staff from the engineering, planning, and code compliance departments.

To supplement the community advisory and focus group meetings, a survey was made available to Cathedral City residents at City Hall, Cathedral City public library, and Cathedral City Senior Center and online to give residents another opportunity to get involved in the City's fair housing assessment and planning process. Spanish versions of the survey were provided to reflect the diversity of Cathedral City's residents. During the eight-week survey period, completed surveys were submitted by 63 Cathedral City residents

In addition to community meetings, the City consulted with public and private departments; social service agencies; and other non-profit organizations to review potential issues to fair housing choice in the public and private sector. A total of fifty-six agencies servicing Cathedral City and greater Riverside County were invited to participate in the process

The 'Draft AFH' was available to the public for thirty (30) days beginning August 15, 2016 through September 13, 2016. Residents were able to view a copy of the report on the City's website or at one of four public locations.

Based on the public participation and data gathering process stated above, the City established the following Goals to address issues found through the AFH process:

- Increase levels of integration by Hispanic residents within higher opportunity neighborhoods.
- Improve the community and housing conditions of the Downtown and Dream Home Area
- Reduce the number of fair housing complaints based on disability.

| See Appendix [D](#) for the full 2016 Assessment of Fair Housing report.

## 2021 Housing Element Update

In addition to the 2016 AFH outreach efforts, the City conducted public outreach in 2021 as part of the Housing Element update process. As discussed in the public participation section of this Housing Element, outreach efforts focused on community and stakeholder workshops, public hearings, and disseminating information through electronic mail notifications and postings on the City’s website. Discussion topics included the difficulties of providing very-low and extremely-low affordable housing units, the need for joint venture projects, and concerns of the impacts of COVID-19 on economic conditions.

A full summary of feedback gathered during these meetings and consultations can be found in Appendix C.

### B. Assessment of Fair Housing

California Government Code Section 65583 (10)(A)(ii) requires Cathedral City to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. High resource areas are those with high index scores for a variety of educational, environmental, and economic indicators. These indicators include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. Moderate resource areas have access to many of the same resources as high resource areas but may have longer commutes to places of employment, lower median home values, fewer educational opportunities, or other factors that lower their indices for economic, environmental, and educational indicators. Low resource areas have the most limited access to all resources. Areas of high segregation and poverty are those that have an overrepresentation of people of color compared to the County, and at least 30 percent of the population in these areas is below the federal poverty line (\$26,500 annually for a family of four in 2021).

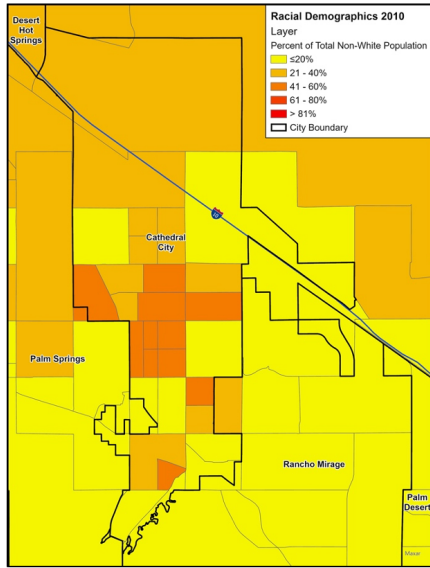
#### a. Integration and Segregation Patterns

To assess patterns of segregation and integration, Cathedral City analyzed several characteristics including race and ethnicity, disability, familial status and household income.

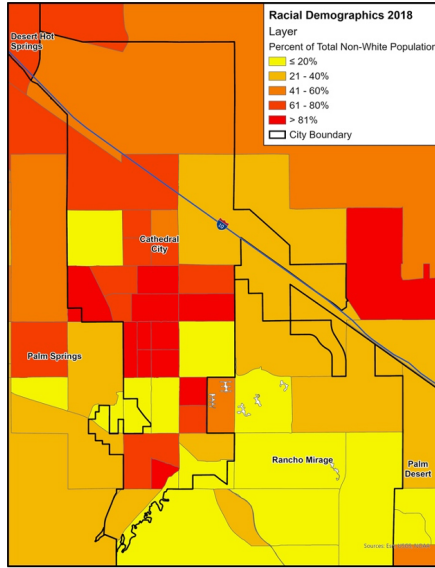
#### ***Race and Ethnicity***

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. According to the 2019 American Community Survey, the largest racial group in the City identifies as “White” (75.6%) and the largest ethnic group identifies as Hispanic (58.6%). Compared to neighboring jurisdictions, Whites are the dominant racial/ethnic group with 81.2% of Rancho Mirage residents to the east and 61% of Palm Springs residents to the west identifying as White. Figure 1 shows racial/ethnic concentrated block groups from in 2010 and Figure 2 shows them in 2018. Consistent with the increase Citywide, most block groups in Cathedral City have seen an increase in racial/ethnic minority populations since 2010.

**Figure 1: Cathedral City Racial Demographics 2010**



**Figure 2: Cathedral City Racial Demographics 2018**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

HUD defines Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) as census tracts with a non-White population over 50 percent and with 40 percent or three times the overall poverty rate. In the Coachella Valley, there are RECAPs scattered in sections of Desert Hot Springs, Indio, Coachella, Thermal, and unincorporated county areas. Currently, there are no R/ECAPs located in the City.

HUD tracks racial or ethnic dissimilarity trends for jurisdictions and regions. The Dissimilarity Index is a demographic measure of the evenness with which two groups are distributed across component geographic areas that make up a larger area. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the groups measured. Index values of 0 to 39 generally indicate low segregation, values between 40 and 59 generally indicate moderate segregation, and values above 60 generally indicate a high level of segregation.

The indices for Cathedral City and the Riverside-San Bernardino-Ontario region from 1990 to 2010 are shown below. Current dissimilarity data was not available; therefore, the following analysis focuses on historic trends. According to the Racial/Ethnic Dissimilarity Trends, both Cathedral City and the Region segregation index rose for all racial/ethnic groups from 1990-2010. The exception was Asian or Pacific Islander within Cathedral City which had a slight decrease in level of segregation in 2010.

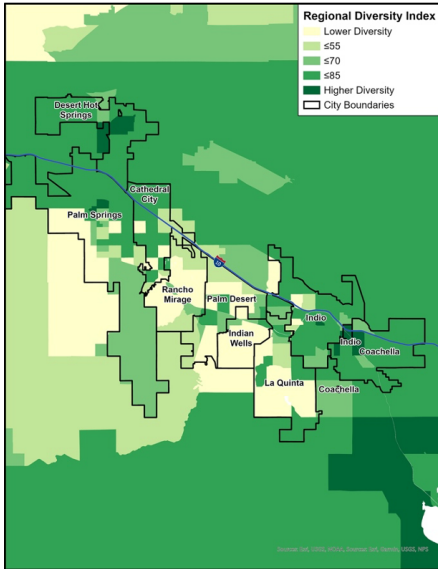
When comparing the average level of segregation over the three Census periods, no group in Cathedral City experienced higher than low segregation. However, for the Region, Blacks and Hispanics experienced moderate levels of segregation. It is important to note, that Blacks were the only group to not experience higher than low segregation within Cathedral City. Conversely, they experienced the highest average percentage of segregation within the Region. Based on these upward trends and the 2010 indices, it can be assumed that both the City and the region are currently experiencing moderate levels of segregation.

<b>Racial/Ethnic Dissimilarity Trends 1990-2010</b>				
	1990 Trend	2000 Trend	2010 Trend	Average
<b>Cathedral City</b>				
Non-White/White	22.59	41.59	45.15	36.44
Black/White	22.22	32.63	37.31	30.72
Hispanic/White	23.85	44.44	46.69	38.32
Asian or Pacific Islander/White	27.21	40.66	40.20	36.02
<b>Riverside-San Bernardino-Ontario</b>				
Non-White/White	32.92	38.90	41.29	37.70
Black/White	43.74	45.48	47.66	45.62
Hispanic/White	35.57	42.40	43.96	40.64
Asian or Pacific Islander/White	33.17	37.31	43.07	37.85

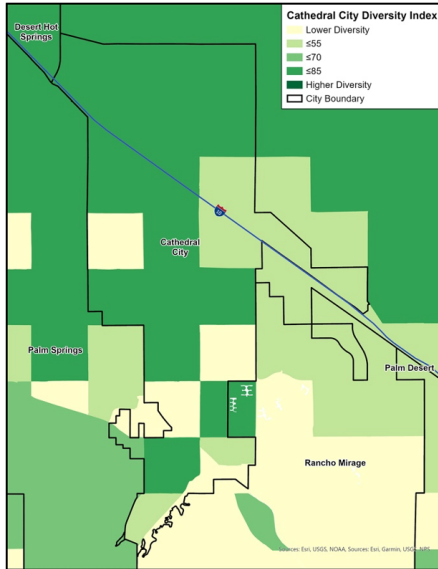
Source: 2016 Cathedral City Fair Housing Assessment

The Diversity Index was used to compare current (2018) racial and ethnic diversity within the City and greater Coachella Valley region. Diversity values range from 0 to 100, where higher numbers indicate a higher degree of diversity among the groups measured. Within the Coachella Valley, the cities of Cathedral City, Palm Springs, Desert Hot Springs, Indio, and Coachella have relatively diverse populations when compared to the cities of Rancho Mirage, Palm Desert, Indian Wells, and La Quinta (Figure 3 Regional Diversity Index). Within Cathedral City there is an alternating pattern of low diversity areas (less than 40) and higher diversity areas (70-85) (Figure 4 Cathedral City Diversity Index). Areas with lower diversity, both within the City and throughout the Coachella Valley region, are predominantly White, and areas with higher diversity are predominately Hispanic. Areas with lower diversity also tend to be less populated which may contribute to these lower values.

**Figure 3: Regional Diversity Index**



**Figure 4: Cathedral City Diversity Index**

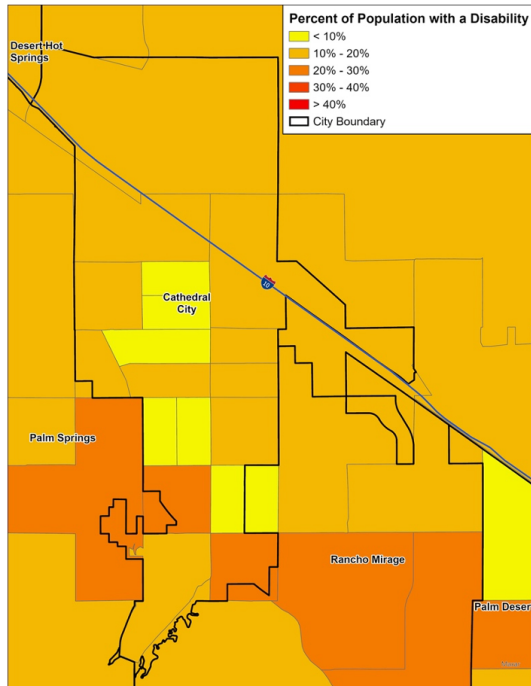


Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

**Persons with Disabilities**

From 2014 to 2019, the percent of the population with a disability remained steady overall with two areas of the City decreasing in concentration. Figure 5 Persons with Disabilities 2015-2019 shows that the majority of the City has a concentration of persons with disabilities ranging between 10 and 20 percent per tract, which indicates the population with disability are evenly dispersed throughout the City. Two tracts have moderate concentration ranging from 20 to 30 percent located in the southern portion of the City just north of the downtown core. These tracts are located in proximity of the downtown area have a moderate to high opportunity value providing access to a variety services and public resources including retail, pharmacies, restaurants, City facilities, housing, and access to transit. Therefore, the population with a disability appears to be integrated in most communities and areas with the higher percentage of the population with a disability located in areas with access to housing and economic opportunities.

**Figure 5: Persons with Disabilities 2015-2019**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

The City complies with all requirements of the Americans with Disabilities Act and California Building Code to provide accessible and “barrier free” units for disabled residents. Section 9.104 of the Zoning Code addresses Reasonable Accommodations and the process for disabled individuals to request modifications for adaptive features in housing. Ramps, stairs, and similar structures necessary for accessibility are allowed by right, and the City does not impose any additional requirements on accessible units and housing for the disabled.

***Familial Status***

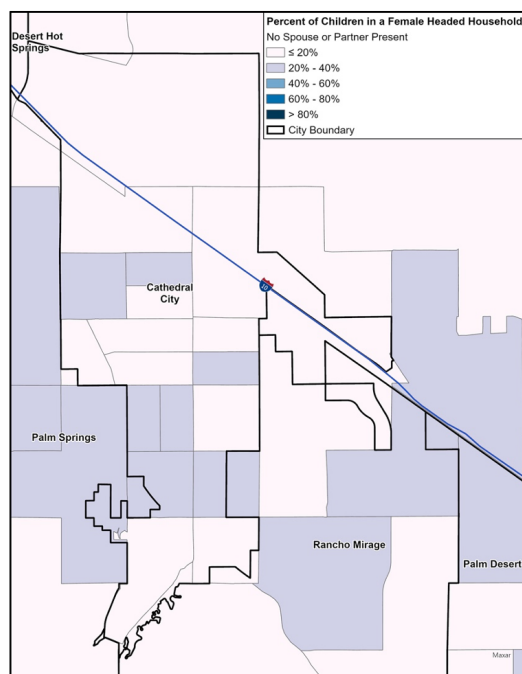
In 2018, the majority of households (44%) within Cathedral City consisted of married couple families, followed by female-headed households with no husband present (26.3%), male-headed households with no wife present (23%) and non-family households (6.7%).

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. According to the AFFH data tool maps, most tracts within the City have a small concentration (<20%) of households with adults living alone, and slightly higher concentrations (20-40%) primarily clustered in the southern tracts. Adults living with their spouse show no significant patterns of concentration and show relatively equal parts of 20 – 40 percent and 40 – 60 percent concentration areas. The percentage of children in married-couple households in Cathedral City is moderate to high (40 – 80 percent), which is consistent with most jurisdictions in the Coachella Valley.

Single parent households are protected by fair housing law. Families with children may face housing discrimination by landlords who fear that children will cause property damage among other biases. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Female-headed households generally have lower incomes, higher rates of poverty, and lower home ownership rates. Approximately 20% of female-headed households have children under age 18, and 32.8% of all families with incomes below the poverty level are female-headed households.

As shown in Figure 6, most tracts in Cathedral City have concentrations of female headed households with children less than or equal to 20 percent. Areas of the City where the concentration of these households ranging from 20 to 40 percent are centrally located north of Gerald Ford Drive and south of McCallum Way. There are two other tracts located north of 30<sup>th</sup> Avenue and south of Vista Chino. As expected, these concentration patterns appear consistent with areas of lower median income and higher rates of poverty. Primary housing needs for this population is affordability and units of appropriate size for the age and gender mix of children. Other considerations include proximity to schools, childcare facilities, recreation areas, and other family services and amenities.

**Figure 6: Female Headed Households with Children**

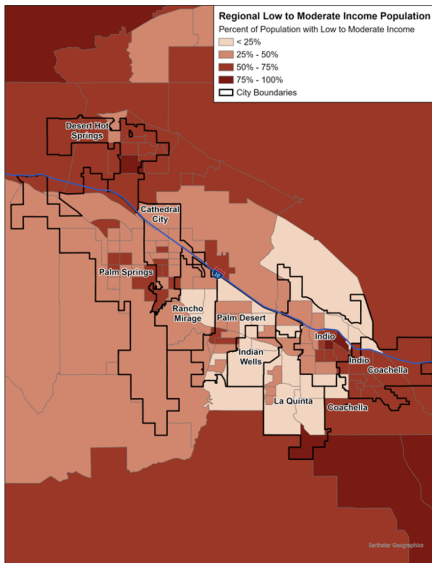


Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

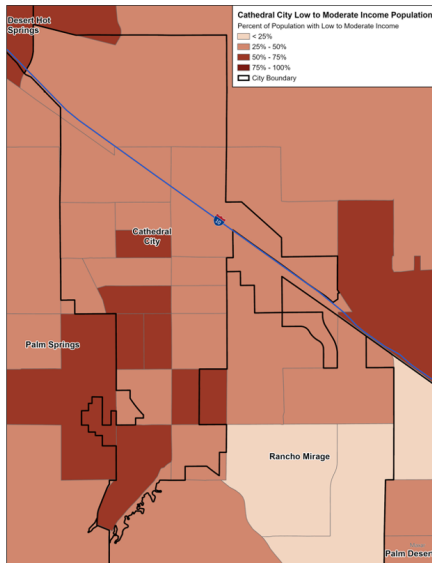
**Income Level**

The City also assessed the concentrations of households below the poverty line to analyze access to adequate housing and jobs. Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figures 7 and 8 show the Lower and Moderate Income (LMI) areas in the Coachella Valley and the City by census tract. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). LMI areas are concentrated in three very general areas in the Coachella Valley. In the northwest area, LMI areas are seen in the cities of Desert Hot Springs and north Palm Springs. In the central portion of the Valley, clusters of LMI areas are seen in Palm Springs, Cathedral City, Palm Desert, and Thousand Palms. In the eastern portion of the Valley, LMI areas are clustered in Indio, Coachella, and Thermal. Within Cathedral City, LMI areas are clustered in the southern and south-central areas consistent with patterns of poverty (Figure 9 Poverty Status) The City’s RHNA is spread out through census tracts with different percentages of low to moderate income households. More RHNA units are present in the 50 to 75 percent range as it is the most prevalent percentage of LMI population per census tract in the City.

**Figure 7: Regional Low to Moderate Income Population**

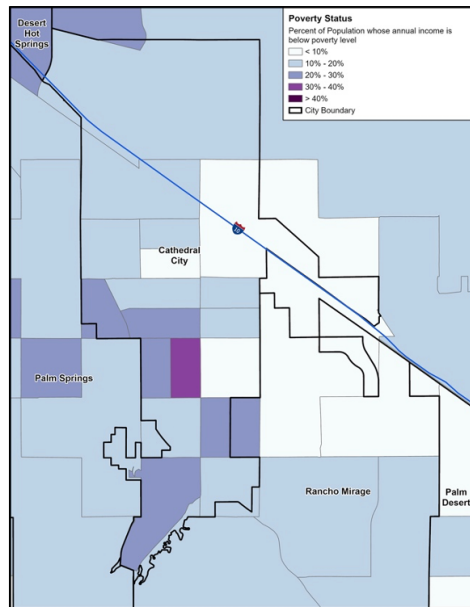


**Figure 8: Cathedral City Low to Moderate Income Population**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

**Figure 9: Cathedral City Poverty Status**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

To be considered economically disadvantaged, the City’s median income would need to be 80% or less than the statewide average (\$75,235), which is equivalent to a median income of \$60,188 or below. Although there are areas within the City with incomes that are higher than the county and statewide average, the City, as a whole, is considered economically disadvantaged because the median income is \$46,521, which is 61.8% of the statewide average. As shown in Table 17 Vacancy Rates, the City of Cathedral City has a vacancy rate of 2.3% for rental units and 2.9% percent for ownership units. These vacancy rates are both extremely low, suggesting little room for mobility and high demand for what affordable units there are.

b. Access to Opportunities

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Table 12 in Assessment of Fair Housing (Appendix D) shows 2016 index scores for the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.

- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

The 2016 index scores showed that Hispanics had the lowest access to opportunity to proficient schools compared to other groups. When poverty level is factored in, Asian or Pacific Islander and Native Americans had the lowest access to proficient schools in Cathedral City. In the Region, the index score for Hispanic's access to proficient schools is also lower when compared to other race/ethnic groups. However, unlike Cathedral City, Hispanics below the poverty line continues to have the lowest access to proficient schools within the Region.

For the Region, job proximity was the highest opportunity index for all groups, while transportation cost was the lowest. Environmental health was the highest opportunity index for all groups within Cathedral City. Conversely, the lowest opportunity for all groups was transportation cost. For residents below the federal poverty line, environmental health remained the highest opportunity index for all groups. Unsurprisingly, poverty ranked as the highest index.

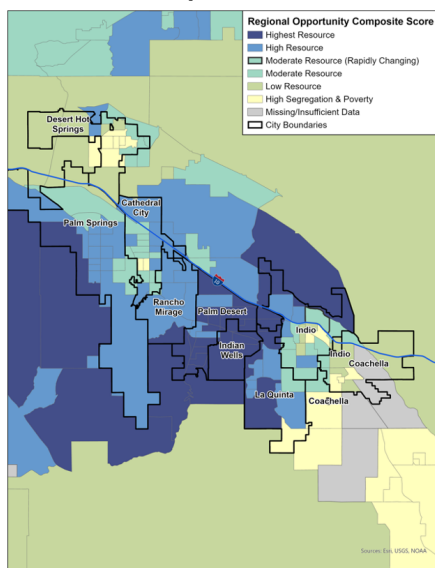
To assist in the analysis of opportunities, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to create Opportunity Maps to identify resources levels across the state. These opportunity maps are made from composite scores of three different domains; economic, environmental, and education. These domains are made up of a set of indicators as follows:

- **Economic:** Poverty, adult education, employment, job proximity, and median home value.
- **Environmental:** CalEnviroScreen 4.0 pollution indicators and values
- **Education:** Math proficiency, reading proficiency, high school graduation rates, and study poverty rates.

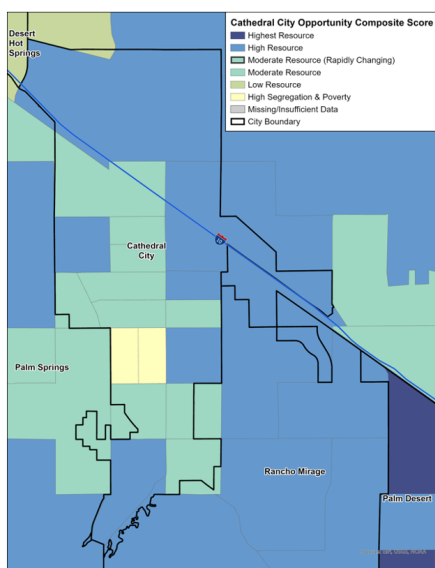
Higher composite scores mean higher resources. Within the Coachella Valley, high and highest resource areas are located in the cities of Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, La Quinta, and Bermuda Dunes. Areas with low to moderate resources are in Desert Hot Springs, Indio, and Coachella. Cathedral City has an even mix of high and moderate resource areas.

Opportunity map scores by Census tract are shown in Figure 10 Regional Opportunity Composite Score and Figure 11 Cathedral City Opportunity Composite Score. The majority of the proposed RHNA sites are located within moderate to high resource areas. There is one area of high segregation and poverty in the City bounded by Ramon Road to the north, Date Palm Drive to the east, Dinah Shore Drive to the south, and the Whitewater River Stormwater Channel to the west. Several RHNA sites are located within this area.

**Figure 10: Regional Opportunity Composite Score**



**Figure 11: Cathedral City Opportunity Composite Score**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

Individual economic, environmental, and education scores for the City are further detailed below.

**Economic**

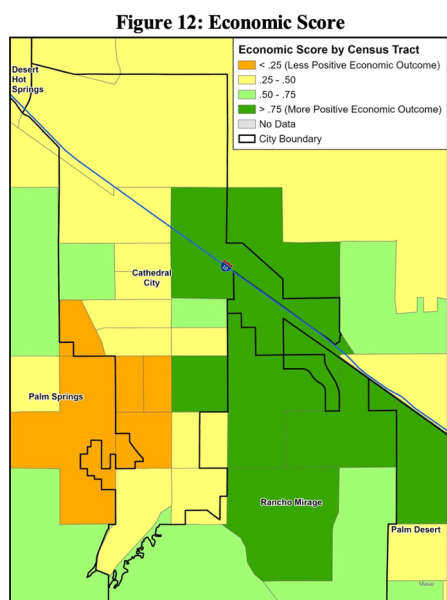
As described previously, economic scores are calculated based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 TCAC map, Figure 12, the majority of the City is considered to have lower economic scores. There are several areas in the City with a high economic score according, however these tracts are mostly within the neighboring jurisdiction (Rancho Mirage) to the east. It is more likely that the portion of the tracts in the City have a low to moderate economic score consistent with the rest of the City.

The most recent unemployment rates published by the California Employment and Development Department (June 2021) show that Cathedral City’s unemployment rate is slightly lower than Riverside County as a whole (7.6 percent and 7.9 percent respectively).<sup>19</sup> The unemployment rate in the County spiked to 14.8 percent during COVID according to the Riverside County Health Departments COVID-19 Economic Impact report for June 2020.

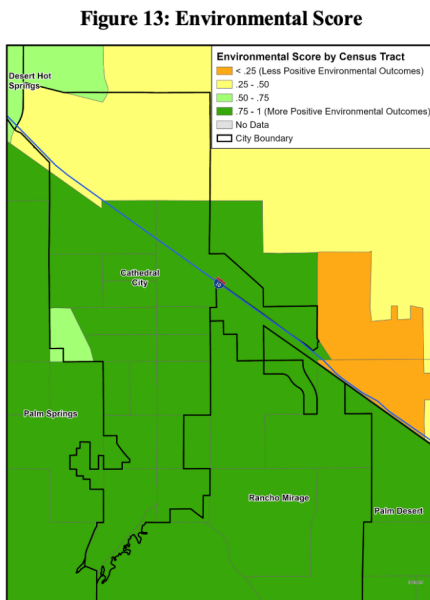
<sup>19</sup> California Employment Development Department annual unemployment rates (labor force), not seasonally adjusted,

**Environmental**

Environmental health scores are based on CalEnviroScreen 4.0 pollution indicators and values. Figure 13 shows that the majority of the City has a high environmental score and therefore all affordable housing sites are located in environmentally favorable areas.



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

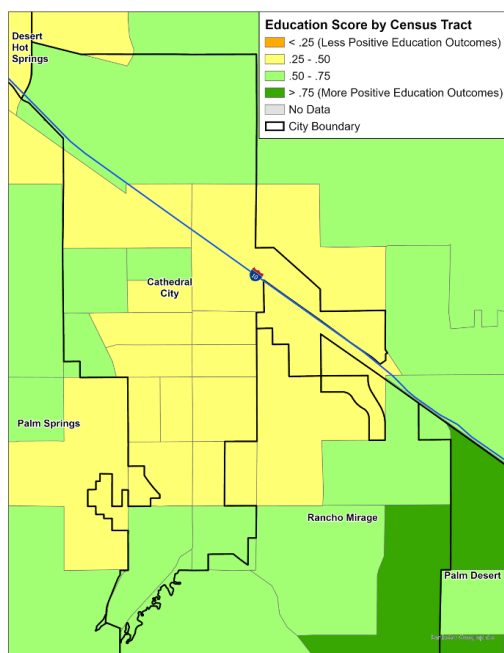
**Education**

Cathedral City is within the Palm Springs Unified School District. According to the U.S Department of Education, of the 28 schools in PSUSD, 18 schools are considered Title 1 schools. To be considered for Title 1 school funds, at least 40 percent of the students must be considered low-income. Kidsdata.org, a program of the Population Reference Bureau (PRB), estimated that 45.1 percent of children aged 0-17 in the Palm Springs Unified School District were living in low-income working families between 2012 and 2016.<sup>20</sup> Kidsdata.org also reported that in 2019, 88.9 percent of students are considered high-need (i.e. those who are eligible for free or reduced price school meals, are English Learners, or are foster youth—as reported in the Unduplicated Pupil Count) compared to 67.2 percent of students in the County.

<sup>20</sup> Kidsdata.org, Population Reference Bureau.  
<https://www.kidsdata.org/region/1098/palm-springs-unified/summary#37/family-economics>.

As described above, education scores are based on math and reading proficiency, high school graduation rates, and student poverty rates. Figure 14 shows the education scores of each census tract in the City. Education scores in the City range from 35 to 60. A majority of the City's census tracts have a moderately low positive education outcome.

**Figure 14: Education Score**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

c. Disproportionate Housing Needs

Disproportionate housing needs is defined as ‘a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.’ 24 C.F.R. § 5.152” The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Cathedral City.

### ***Cost Burden***

Measuring the portion of a household's gross income that is spent for housing is an indicator of the dynamics of demand and supply. This measurement is often expressed in terms of "over payers": households paying an excessive amount of their income for housing, therefore decreasing the amount of disposable income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community.

The latest CHAS data for the 2013-2017 period for Cathedral City shows that 39.4% of owner households are overpaying for housing, and 20.4% are severely overpaying. Of all lower-income owner households, 70.4% are overpaying, and 46.1% are severely overpaying. Although rental housing, as described above, can be affordable to lower income households in the City, there is still an overpayment issue with these households. The patterns are similar for renter households. Of all renter households, 56.1% are overpaying, and 28.5% are severely overpaying. Percentages are higher for low-income households as a group. Of all lower-income renter households, 75.1% are overpaying, and 41.5% are severely overpaying.

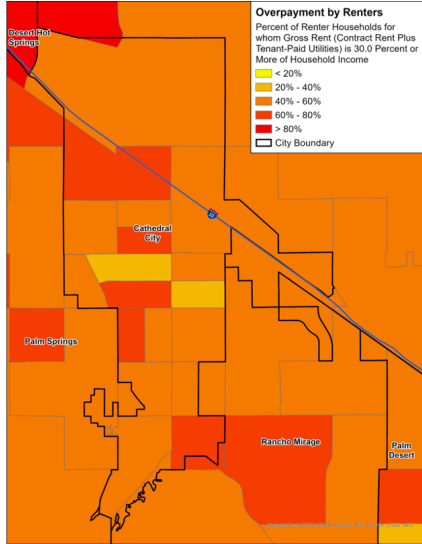
Figure 15 shows the census tracts in the City and the percent of households in renter-occupied housing units that have a cost burden. A majority of the census tracts in the city have 40 to 80 percent of the renter households overpaying for their housing unit. Figure 16 shows the percent of owner households that have a mortgage or mortgages with monthly owner costs that are 30 percent or more of household income. A majority of the census tracts in the City have 20 to 40 or 40 to 60 percent of households that pay more than 30 percent of their household income to their monthly housing costs.

### ***Overcrowding***

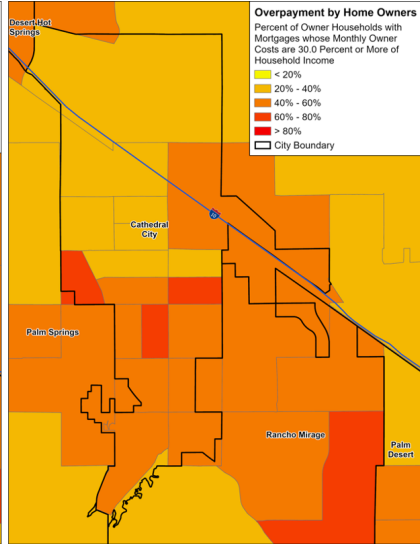
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). As indicated by the 2019 ACS, Cathedral City has 1,663 overcrowded housing units, which represents 8.8% of the total 18,816 occupied units in the City. Of overcrowded units, 71.5% are renter-occupied units and 28.5% are owner-occupied units. Severely overcrowded units have more than 1.5 persons per room and are a subset of overcrowded units. Nearly 40% of all overcrowded units in the City are severely overcrowded. About 70.7% of them are renter-occupied units, and 29.3% are owner-occupied units. Figure 17 shows the census tracts in the City and the percent of households that are overcrowded. Overall, the City is consistent with the statewide average of less than or equal to 8.2 percent. There are several tracts in the south-central portion of the City in areas with higher percentages of overcrowding that correspond to areas higher poverty rates and concentrations of low income households.

(See EXISTING HOUSING STOCK CHARACTERISTICS section for detailed discussion of overcrowding)

**Figure 15: Overpayment by Renters**

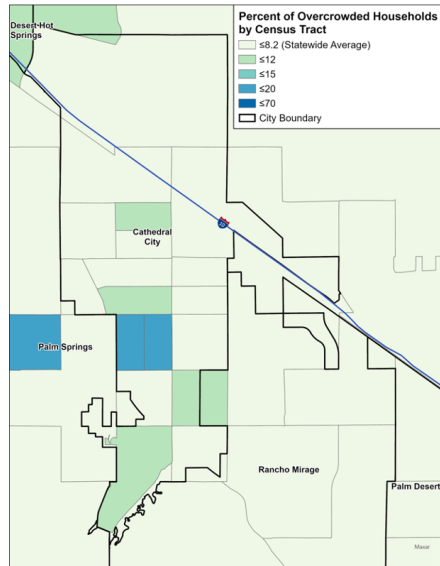


**Figure 16: Overpayment by Owners**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

**Figure 17: Overcrowded Households**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

### ***Substandard Conditions***

The City estimates that about 14,363 housing units are in substandard condition that require more regular maintenance and repair, or in the case of the older units, may also require more extensive rehabilitation or replacement. To improve housing conditions, the City will develop a Housing Rehabilitation Program that provides access to low interest loans funded by CBDG funds to low-income families who need to make improvements to make their homes safe to occupy (Program 3.A.2). As part of this new program, the City shall also conduct a City-wide windshield surveys to identify general housing conditions to estimate the number of residential structures in need of rehabilitation or replacement.

(See EXISTING HOUSING STOCK CHARACTERISTICS section for detailed discussion of housing conditions)

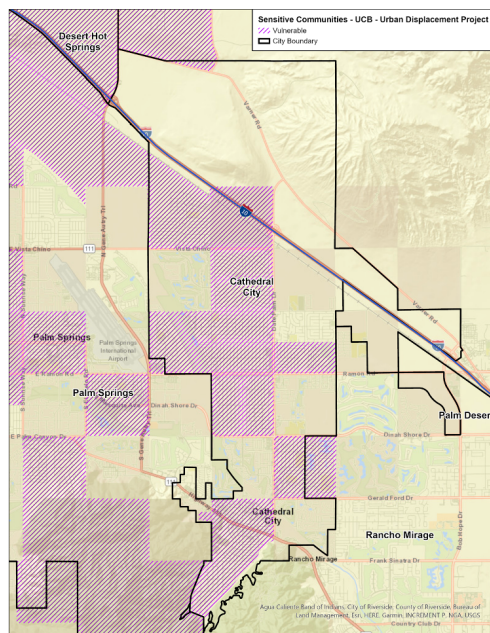
### ***Displacement Risk***

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

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

Figure 18 identifies 11 census tracts that are considered to be vulnerable to urban displacement. These communities are areas that have a higher concentration of low- and moderate-income persons (Figure 8) and female-headed households (Figure 6) and increased rates of poverty (Figure 9). Several RHNA sites are located within these tracts which will help alleviate displacement risks for lower income households.

**Figure 18: Urban Displacement**



Source: California Department of Housing and Community Development, AFFH Data Viewer 2021

d. Enforcement and Outreach Capacity

The City reviews periodically its policies and code for compliance with State law on fair housing and enforces fair housing through investigation of fair housing complaints. In addition to fair housing issues related to development standards, fair housing issues can also include discriminatory behaviors by landlords such as refusal to grant reasonable accommodation requests, not allowing service animals, discrimination against familial status, sex, religion, or other protected class, and more.

Inland Fair Housing and Mediation Board (IFHMB) conducted a review of all fair housing complaints received from the Cathedral City for the fiscal year of 2015-2016. Current (2021) records were requested from IFHMB; however, a response was not received. In 2015-2016, IFHMB staff mapped the location of the complaints and analyzed the type of complaints as a means of identifying trends with fair housing concerns, and it can be assumed that similar trends exist today because there has not been a major shift population/geographic characteristics within the City. The objective of this process is to report the specific findings to the City to make officials more aware of the nature of discriminatory housing issues within the city.

In the 2015 fiscal year, there were a total of seven (7) fair housing cases opened by the agency. Of the seven (7) cases, five (5) cases were regarding allegations of disability discrimination, one (1) was regarding allegations of discrimination based on sex discrimination, and one (1) was regarding national origin. Disability discrimination was the primary concern of residents during the period in review. In the five (5) cases with concerns regarding disability discrimination IFHMB provided assistance with reasonable accommodations requests. Three (3) of the disability cases requested information and IFHMB mediators were able to assist these clients by providing clarification on rights and the request process. The informational cases included clients that had questions regarding regulations on the width of doorways for wheelchairs, and issues with smoking and respiratory disabilities. In these cases, IFHMB mediators assisted by providing information about fair housing protections and an informational packet on how to request accommodations.

Aside from informational cases, two (2) cases involved the provision of additional assistance and mediation in seeking accommodations or modifications. One client was a cancer patient whose apartment unit fell into disrepair. The client's symptoms were aggravated by items that needed to be fixed by the landlord, and mediation helped the landlord and tenant engage in an interactive process to discuss the repairs. Another client was recovering from surgery and had difficulty seeking their next place of residence. IFHMB staff were able to inform the resident about their rights and assisted in their search for alternative housing when accommodations were not possible.

The national origin case involved a resident who did not receive timely repairs due to their nationality and limited English proficiency. The fair housing case based on sex involved a woman who alleged discrimination and harassment by her housing provider. In both cases, mediators assisted in providing information and assistance with filing fair housing complaints. The demographic statistics of the above-referenced clients indicated that there were three (3) Hispanic, and four (4) non-Hispanic clients. Additionally, five (5) clients were female, while two (2) were male.

A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramon Road. According to the 2010 US Census data, this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic and are consistent with current trends.

The pattern that emerges from this period of review is that there are clusters of fair housing calls within Cathedral City. The leading categories of concern are disability discrimination. A targeted campaign of engaging housing providers and tenants in these specific areas with education and outreach materials may be one way to address the issue. IFHMB welcomes the opportunity to collaborate with City staff to determine the most effective means of reaching these communities.

e. Identification and Prioritization of Contributing Factors

Discussions with community organizations, fair housing advocates, and the assessment of fair housing issues identified several factors that contribute to fair housing issues in Cathedral City, including:

- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of local private fair housing outreach and enforcement
- Community Opposition
- Displacement of residents due to economic pressures Lack of private investments in specific neighborhoods Land use and zoning laws
- Issues to mobility
- Lending Discrimination
- Location and type of affordable housing
- Private discrimination

Based on the analysis and findings of the 2016 AFH and analysis of current trends, three goals were identified to further housing equity in Cathedral City:

1. Increase levels of integration by Hispanic residents with higher opportunity neighborhoods. The City shall work with the Inland Fair Housing and Mediation Board (IFHMB) to provide mobility counseling, educating apartment owners and managers in higher opportunity neighborhoods on the benefits of Housing Choice Vouchers, and increase the multi-family housing market in higher opportunity neighborhoods.
2. Improve the community and housing conditions of the Downtown and Dream Home area by conducting a Community Needs Assessment with particular focus on housing rehabilitation/replacement and infrastructure improvement through the use of CDBG and other public/private investments/funds.
3. Reduce the number of fair housing complaints based on disability. To meet stated goal, the City will work with the IFHMB to implement a targeted campaign of engaging housing providers and tenants in specific areas with education and outreach materials to address the issue.

These and other goals pertaining to housing equity are incorporated into the Goals, Policies, and Programs section. Affordable housing units are geographically distributed throughout the community to avoid clustering of economic, racial, and other populations. The City is committed to continued implementation of fair housing practices. The inventory of land suitable and available for future housing development includes parcels that are distributed throughout the community to help foster integrated living patterns (see Land Inventory, below). A schedule of policies and programs for continuing these efforts through the 2022-2029 planning period is provided in the Goals, Policies and Programs section below.

Cathedral City was able to identify sufficient sites for the 2022-2029 cycle in areas identified as having a need for affordable housing based on patterns of segregation, poverty, low-income houses, displacement risk, and access to opportunity. Inventory lands are geographically distributed throughout the City, and the sites identified in the Inventory will not exacerbate any such fair housing related conditions.

## HOUSING NEEDS

Each city is required to analyze existing and projected housing needs and develop an implementation program to describe how the city will attain its housing goals. In addition, the projected housing need must include a locality’s fair share of regional housing needs. In 2020, the Southern California Association of Governments (SCAG) approved the Regional Housing Needs Assessment (RHNA) for the 2022-2029 period. The City of Cathedral City’s allocation under the RHNA is depicted below.

**Table 35**  
**RHNA by Income Category, 2022-2029**

Income Category	No. of Units
Extremely Low Income <sup>1</sup>	270
Very Low Income (<50% of AMI)	270
Low Income (50-80% of AMI)	353
Moderate Income (81-120% of AMI)	457
Above Moderate Income (> 120% of AMI)	1,199
<b>Total Units</b>	<b>2,549</b>

<sup>1</sup> Extremely Low Income (ELI) category is a subset of the Very Low Income category. ELI households are defined by HCD as those with incomes less than 30% of AMI. The number of units needed is assumed to be 50% of all Very Low-Income units.  
Source: SCAG 2020

### Quantified Objectives

The following table estimates the number of units likely to be constructed, rehabilitated, or conserved/preserved, by income level, in Cathedral City during the 2022-2029 planning period.

**Table 36**  
**Quantified Objectives, 2022-2029**

	New Construction	Rehabilitation	Conservation
Extremely Low Income	270	68	
Very Low Income	270	154	27
Low Income	353		
Moderate Income	457	2	108
Above Moderate Income	1,199		
<b>Total:</b>	<b>2,549</b>	<b>224</b>	<b>135</b>

**Commented [KC5]:** Added per HCD letter item D. Nova Ocotillo has 135 total units, 27 are very low income, rest are mod/above mod

### Land Inventory

The City’s Regional Housing Needs Assessment for 2022-2029 estimates that a total of 2,549 housing units will be built in Cathedral City. Of these, 1,199 are expected to be constructed for those of above moderate income. These units are expected to be market-driven and constructed as single-family units typical of those already in Cathedral City. As shown in the “Housing Costs and Affordability” analysis above, moderate income households in Cathedral are able to afford currently-marketed housing in the community. The City has also identified sites for moderate income units in its land inventory in order to bolster the availability of these units during the planning period.

**Table 37** provides a list of available parcels to meet the City’s RHNA allocation. The Table includes the Assessor’s Parcel Number (APN), acreage, and potential number of units that could be developed on each parcel. The table also provides a comparison of each site’s permitted density per the Development Code and the realistic density of the site, which has been adjusted to account for space required for infrastructure, open space, and the commercial components of the mixed-use zones. The City has a RHNA allocation of 893 units for low-, very-low- and extremely-low-income units. The inventory of sites could accommodate 1,088 lower-income units in the DTC, DRN, MXC, R-2 and R-3 zones, which exceeds the lower-income RHNA allocation.

As previously discussed under Fair Housing Assessment, affordable housing units are geographically distributed throughout the community to avoid clustering of economic, racial, and other populations. The sites identified below will not exacerbate any such conditions.

As shown in **Table 37**, there is current realistic capacity for 1,880 total additional units for moderate and above-moderate incomes.

A map of available sites is provided in Appendix B.

**Table 37**  
**Inventory of Available Vacant Land**

Map No.	Description	GP/Zone	Permitted Density (current/proposed)	Realistic Density (current/proposed)	Site Acreage	Potential Units
<b>Lower-Income Sites</b>						
1	687-198-001 to -006 <i>687-198-001</i> <i>687-198-002</i> <i>687-198-003</i> <i>687-198-004</i> <i>687-198-005</i> <i>687-198-006</i>	DTC/DRN	36	27	1 <i>0.17</i> <i>0.16</i> <i>0.17</i> <i>0.17</i> <i>0.16</i> <i>0.17</i>	27
2	670-240-024	MU-U/MU-U	45	36	7 of 87	252
<b>Subtotal – Sites allowing &gt;30 du/ac</b>					<b>8</b>	<b>279</b>
3	680-260-025	RH/R-3	20	20	0.89	18
4	680-260-031	RH/R-3	20	20	3.58	72
5	680-260-032	RH/R-3	20	20	3.58	72

**Table 37  
Inventory of Available Vacant Land**

Map No.	Description	GP/Zone	Permitted Density (current/proposed)	Realistic Density (current/proposed)	Site Acreage	Potential Units
6	677-420-016	RH/R-3	10/20	10/20	29.41	588
7	(Veterans Village)	RL/R-L	Currently Under Construction		8.97	60
<b>Subtotal – Other lower-income sites</b>					<b>46.43</b>	<b>809</b>
<b>Moderate-Income Sites</b>						
8	677-050-017	RMH/R-3	20	20	14.69	294
9	680-190-037	RMH/R-2 RMH/R-3	10/20	10/20	7.06	141
2	670-240-024	MU-U/MU-U	45	20	6 of 87	120
<b>Subtotal – Moderate-income sites</b>					<b>28.12</b>	<b>555</b>
<b>Above Moderate Income Sites</b>						
10	677-050-018	RH/R-3	20	12	18.12	217
11	670-130-004, 005, 014, 015  670-130-004 670-130-005 670-130-014 670-130-015	RL/R-1	4.5	4.5	26.59  1.67 5.91 9.38 9.63	120
12	677-510-036 to 041, 044, 052, 061, 063 and 677-522-014 and 015  677-510-036 677-510-037 677-510-038 677-510-039 677-510-040 677-510-041 677-510-044 677-510-052	RR/RR	6.5	7	12.02  0.69 0.69 1.44 1.12 1.04 1.03 0.16 1.02	84

**Table 37  
Inventory of Available Vacant Land**

Map No.	Description	GP/Zone	Permitted Density (current/proposed)	Realistic Density (current/proposed)	Site Acreage	Potential Units
	677-510-061 677-510-063 677-522-014 677-522-015				0.45 2.35 0.98 1.05	
13	687-040-057	RM/R-2	10	10	15.39	154
City-wide*	Infill Vacant SF Lots	RL/R-1	4.5		Varies	650
2	670-240-024	MU-U/MU-U	45	5	20 of 87	100
<b>Subtotal – Above moderate income sites</b>					<b>92.12</b>	<b>1,325</b>
* Includes scattered R-1 and R-2 lots, and unfinished projects including Rio del Sol (210), Campanile (165), Escena (50) and Rio Vista Village (75).						
<b>Total Units</b>						<b>2,968</b>

Realistic Capacity

For purposes of analyzing capacity of inventory sites, the City looked at development trends for affordable housing projects regionally and determined that certain sites can realistically be expected to develop at a density of 20 units per acre, with the application of an affordable housing overlay. This is consistent with the development of affordable housing proposed and/or constructed in recent years in the Coachella Valley, including:

**Commented [KC6]:** Per HCD comment letter item B3

Palm Springs:

- Monarch Apartments will provide 60 units affordable to very low- and low-income households on 3.6 acres, at a density of 17 units per acre. The project is fully funded and will break ground in October of 2021.

Cathedral City

- Veterans Village will provide 60 units affordable to extremely low-, very low- and low-income veterans on 9 acres, at a density of 6.6 units per acre. The project is fully funded and expected to be completed by the end of 2022.

Palm Desert:

- Carlos Ortega Villas consists of 72 units on 3.48 acres affordable to very low- and low-income households, at a density of 21 units per acre.
- Vitalia, 270 units affordable to very low- and low-income households on 12 acres approved in 2021, at a density of 23 units per acre.
- Millennium SARDA site, 240 units affordable to very low- and low-income households on 10 acres, under contract in 2021, at a density of 24 units per acre.

La Quinta:

- Coral Mountain Apartments, constructed in 2018, provides 176 units on 11 acres for very low- and low-income households, at a density of 16 units per acre.

Indio:

- Arroyo Crossing 1 is currently under construction and provides 184 units on 6.4 acres affordable to very low- and low-income households, at a density of 29 units per acre.
- Arroyo Crossing 2, will provide 216 units affordable to very low- and low-income households on 7.3 acres, at a density of 30 units per acre. The project was approved in 2021.

Cities in the Coachella Valley, including Cathedral City, can expect, in the current market, that projects ranging in density from 10 to 30 units per acre are being funded and can be built to accommodate lower income households. Therefore, the City's reliance on densities from 20 to 27 units per acre is realistic and can be achieved in the planning period. The development potential for sites' #1 and #2 is particularly high because the City is directly involved in the development of these sites. Specifically, site #1 is comprised of City-owned parcels and will therefore be able to control the site's density, and site #2 is part of a larger parcel where the City is actively working with the developer to accommodate a number of affordable housing projects, as detailed in Program 1.A.9. Furthermore, site #2 is within the MU-U zone of the North City Specific Plan area which is permitted a maximum gross density of 45 dwelling units per acre; however, the land inventory assumes a more realistic density of 36 units per acre which is comparable to approved higher density affordable housing developments in the Coachella Valley.

Change of Zone

As shown in the Table, site #9 will require a Change of Zone in order to change the site to a high-density zone. Program 1.A.7 addresses the need to complete this action immediately following adoption of the Housing Element for the 2022-2029 planning period. All other sites are currently designated for the appropriate density to accommodate the City's RHNA allocation.

Small Sites

Sites smaller than a half-acre in size are typically deemed inadequate to accommodate housing for lower-income households unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. Sites #1, #11 and #12 are comprised of multiple parcels, some of which are less than a half-acre. Per Program 2.D.3, the City shall develop incentives for consolidating smaller parcels to make the development of affordable housing projects more feasible.

**Commented [KC7]:** Add per HCD letter item B3 *Small Sites*

Large Sites

Sites greater than 10 acres are not eligible for the inventory absent a demonstration that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless other evidence is provided. Sites #2, #6, #8, and #10 through #13 are all greater than 10 acres. With regard to site #2, the City is currently working with the developer to designate portions of the 87-acre site for lower, moderate, and above-moderate housing. Specifically, 7 acres for lower-income housing, 6

**Commented [KC8]:** Added per HCD letter item B3 *Large Sites*

acres for moderate income housing, and 20 acres for above-moderate income housing. Program I.A.9 requires the City to develop incentives for subdividing larger sites to make the development of affordable housing projects more feasible while encouraging a range of development sizes.

#### “Prior Inventory” Sites

Pursuant to Government Code Section 65583.2(c), sites that have been identified in the previous two cycles (4<sup>th</sup> and 5<sup>th</sup>) must be allowed by by-right approval for housing development that includes 20 percent of the units as housing affordable to lower income households. None of the current inventory sites were included in both the 4<sup>th</sup> and 5<sup>th</sup> Housing Element cycle and therefore no action is required.

**Commented [KC9]:** Added per HCD letter item B3 .Sites identified in prior planning periods.

#### Veterans’ Housing Project

The City is currently moving forward with the development of a 60-unit project, including 48 one bedroom and 12 two-bedroom units. Of the total 60 units, 20 units will be extremely, 10 units very low (40% of median) and 29 units – low (60% of median) for veterans. The City has entered into a Development Agreement for the project, which requires that the project be complete by the end of 2022. The project will be located on a 9-acre site on Landau, between Vega Road and Elizabeth Road. The City’s Successor Agency is providing the land, and a \$1 million grant to the development company. The City’s contribution is valued at \$2.16 million. These units will be available for the 2022-2029 planning period.

#### Single Family Residential Potential

In addition to the parcels listed in **Table 37** there are an additional 2,125 acres of vacant lands designated for low density residential in the City which can accommodate 7,800 single family residential units for the Above Moderate land use category during the planning period.

#### North City Specific Plan

In 2007, Cathedral City annexed over 1,300 acres into the City’s limits north of Interstate 10. A specific plan, known as the North City Specific Plan (NCSP), was adopted in 2009. The specific plan area totals approximately 5,000 acres and estimates the maximum residential buildout potential to be approximately 9,618 dwelling units.

In 2014 the City adopted the North City Extended Specific Plan (NCESP) that encompasses 591 acres of recently-annexed lands that expands and builds upon the original NCSP. The NCESP is anticipated to generate up to 3,200 residential units, for a combined total of 12,818 potential units in the North City area.

As proposed, the North City and the North City Extended Specific Plan areas will provide for a wide range of residential opportunities. The diversity of residential densities range, for example, between Mixed Use - Urban (MU-U), which allows up to 45 dwelling units to the acre, and Residential Estate (RE) at 2 dwelling units to the acre.

It should be noted that development in much of this area is currently constrained by the limited availability of infrastructure. The City is working to expand the availability and capacity of service systems to facilitate development of this important new area. This infrastructure expansion began in 2018 with the development of commercial parcels within the North City Extended Specific Plan area. One site, #2 in Table 37, is immediately adjacent to the existing

commercial development, and is now served by all utilities. This site has been identified as having potential for a broad range of units, and is included in the Inventory to address very low, low, moderate and above moderate income household needs. As development expands in this area and in the North City Specific Plan area, water and sewer extensions will also allow the expansion for additional housing. Both CVWD and DWA have sufficient water supplies and sewer capacity available to meet the City's build-out demands, including the units listed in the inventory.

**Commented [KC10]:** Clarified availability of sewer capacity per HCD comment letter item A: "Availability of Infrastructure" and "Water and Sewer Priority"

#### No Net Loss

In compliance with SB 166 (No Net Loss), Program 1.A.8 has been added requiring the City to monitor the development of residential acreage to ensure an adequate inventory is available to meet the City's RHNA obligations. The City will implement the formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 to ensure sufficient residential capacity is maintained to accommodate the RHNA. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify replacement sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA.

#### Environmental Constraints

The sites identified for future residential development are located in urbanized areas of the City and are currently designated for residential use. No sites are subject to significant geotechnical or wildfire hazards. Most sites are located either outside of a flood zone or within an area protected by a levee except for site #13. These sites are located within a 100-year flood zone; however, the City requires all new development located within the boundaries of a flood zone to incorporate mitigation measures that prevent adverse impacts due to flooding, which will require a Conditional Letter of Map Revisions (CLOMR) and Letters of Map Revisions (LOMR) from FEMA assuring the minimum National Flood Insurance Program standards are met. There are no significant environmental constraints to development on the identified sites.

**Commented [KC11]:** Added per HCD comment letter item 3 Environmental Constraints.

### **RESTRICTED HOUSING PROJECTS<sup>21</sup>**

The City of Cathedral City has a number of affordable housing options within its boundaries. These include the following:

#### Mountain View Apartments

This 280-unit project is located at 68-680 Dinah Shore Drive. The project was completed in three phases and was completely financed with a FmHA 515 loan. The project was built in 1982, and refinanced in 1997. The complex is restricted to seniors 62 years of age or older, unless disabled or handicapped. Rent is restricted to 30% of the renter's income, and water and trash services are included in the price of rent. The units are restricted to very low- and low-income households. This project was at risk of losing affordability controls in 2015, however a notice of intent to convert or sell these units has not been received to date. The City continually monitors this project for potential notice to release affordability controls.

<sup>21</sup> "City of Cathedral City: Affordable Housing Locations for the Coachella Valley 2006," assistance programs for the Coachella Valley, September 2008.

#### Corregidor Apartments

This 16-unit project restricted to very low-income families was built in 1985 using LPRH housing funds. This project site is owned by the Riverside County Housing Authority and is located at 34-355 Corregidor Drive. This project is not at risk of losing affordability controls.

#### Cathedral Palms Apartments

This 224-unit project is located at 31750 Landau Boulevard. The “All Senior” project was originally constructed in 1968 and substantially rehabilitated in 1997, using bonds and RDA set aside funds. The City is currently participating in a major rehabilitation of the units, in cooperation with National CORE. The project will be reconfigured into 224 units (184 studio and 38 (2) bedroom units plus 2 manager units) of which 222 will be deed restricted: 68 units extremely low and 154 very low (50% below). Although the National CORE may have up to December 2022 to complete the project, it is anticipated to be completed by the end of 2021 to early 2022. The project offers 190 studios and 40 two-bedroom apartments to low-income seniors over 55 years of age. Utilities are provided, including water, gas, cable, and domestic trash services. This project has an affordability control through 2052.

#### Terracina Apartments

This project provides 80 units to low- and moderate-income families consisting of 1 one-bedroom unit, 47 two-bedroom units, 30 three-bedroom units, and 2 four-bedroom units. It is located at 69-175 Converse Road and was built in 1994. In 2010, the former RDA provided assistance to ensure these units remained affordable for an additional 55 years.

#### CVHC Duplex Conversion Project

Between 1997-1999, the Redevelopment Agency cooperated with the Coachella Valley Housing Coalition to acquire 16 bank-owned duplexes (originally constructed in the 1980’s) and convert the units into 34 affordable, single-family, owner-occupied homes through a self-help program. The families acquired the units at an affordable purchase price, and rehabilitated and converted the homes as part of their down-payment. The sunset dates for affordability controls vary from 2027 through 2035.

#### Casa Victoria

Casa Victoria is a 50-unit project (49 restricted plus 1 manager unit) opened in 1999 using HUD 202 funds. This project provides housing for low-income seniors over 62 years of age. Rent is restricted to 30% of their income, and utility allowances are offered. The apartment complex is located at 34-445 Corregidor Drive. This project has an affordability control through 2052.

#### Heritage Park

Contains 153 units within a two-story complex, including 144 one-bedroom units and 7 two-bedroom units and two management units. The project is located at 69-100 McCallum Way. This project provides housing for low-income seniors over 55 years of age. Water and trash services are included in the price of rent. This project has an affordability control through 2059.

#### Creekside Apartments

Consists of 185 units within a one and two-story complex. There are 40 two-bedroom units, 104 three-bedroom units, and 40 four-bedroom units. This project provides housing for low and very

low-income families. Water and trash services are included. The project is located at 68-200 33<sup>rd</sup> Avenue. This project has an affordability control through 2059.

Nova Ocotillo Place

Provides 135 apartments, of which 108 units are for moderate to high income tenants, and 27 units are for very low-income tenants. The low-income units were acquired using bond financing from CSCDA. The project is located at 69155 Dinah Shore Drive, and was acquired and substantially rehabilitated using a bond issue in 1998. One- and two-bedroom units are offered, and tenants pay a small portion of the water and gas bill. The project has a termination date of 2027 and is discussed under “Affordable Units at Risk,” below.

Park David Apartments

This 240-unit apartment project for low-income seniors over 55 years of age is located at 27-700 Landau Boulevard. The project contains 120 one-bedroom units and 120 two-bedroom units, and does not supplement any utilities for residents. The complex, which became operational in 2000, offers 20% of the units to very-low-income seniors and 80% to low-income seniors. This project has an affordability control through 2055.

Northwoods (Canyon Vista) Apartments

This family project offers 90 units, of which 46 are low-income units. It is located at 68-605 Corral Road. This project has an affordability control through 2056.

Casa San Miguel de Allende

This two-story, 39-unit, special-needs housing project is located in multiple buildings on and around Melrose Drive in the Cove neighborhood, south of East Palm Canyon Drive. The project is restricted to very-low-income disabled persons. It was opened in 1998 using HOME, RDA, HOPWA, and CDBG funds. This project has an affordability control through 2053.

Tierra del Sol

This project provides 75 one-bedroom units to very-low-income senior households over the age of 62. It was primarily funded with local and HUD 202 funding and rents are 30% of the tenants' income. Tierra del Sol provides gas for hot water. It is located at 37101 W. Buddy Rogers Avenue. This project has an affordability control through 2063.

Cathedral Towne Villas

Located at 36-700 Pickfair Street, this 61-unit apartment complex offers family housing to moderate-income families. This project has an affordability control through 2061.

River Canyon Apartments

Located at 34-300 Corregidor Drive, this project offers 60 units; (41 2-bedroom and 19 3-bedroom; 6 units restricted to extremely low, 39 units very low, 14 units low and 1 manager unit). This project was completed in 2011.

**Affordable Units at Risk**

The project previously known as Ocotillo Place, now called Nova Ocotillo Place, contains 27 very-low-income units. The City acquired affordability restrictions in 1998. The project has a termination date of 2027, which will be during this planning period. This is the only project at

risk of termination of affordability covenants in the City. Based on the City’s most recently obtained pro-formas for affordable housing projects, construction costs for replacement of these units would be \$317,000 per unit, on average. Preservation is a much lower cost of approximately \$233,000 per unit.<sup>22</sup> Therefore, the preservation of these units is important to the City’s affordable housing inventory. There are several entities who are involved in the acquisition and rehabilitation of affordable housing projects, including National Core, Urban Housing Communities, Habitat for Humanity, and Community Preservation Partners. Program 2.A.3 describes actions the City will take to facilitate the preservation of affordability covenants for this project.

It is anticipated between January 2021 and the sunset dates, the City will be able to explore opportunities to extend affordability covenants once funding becomes available. For example, PHLA funds administered by the County may be used for major rehabilitation projects intended to induce covenant extensions.

In addition, multiple ownership units have been built in the City under various self-help or sweat-equity programs. As shown in **Table 38**, there are 535 of these units in the City. The affordability restrictions associated with these units will lapse during the planning period. Program 2.A.4 has been added to assure that the City will work towards protecting these affordability covenants.

**Table 38**  
**Restricted Affordable Owner-Occupied Units**

<b>Owner-Occupied Housing</b>	<b>Units</b>	<b>Income Category</b>	<b>Earliest Release</b>	<b>Type of Subsidy</b>
30 to 45 year Covenant with resale restrictions	492	Very low to moderate income	2025 or at pay-off	RDA – CHIP loans/grants
30 year Habitat for Humanity Housing	11	Very low income	2025	RDA Habitat grants
30 year Covenant with resale restrictions CVHC conversion	14	Very low to low income	2025	Home Grant & RDA silent second
30 year Covenant on self-help homes	7	Very low income	2025	RDA/Silent Second
30 year Covenant on 1st Time Homebuyer grant	11	Very low and low income	2027	RDA Grant

Source: Housing Successor Agency

## POTENTIAL CONSTRAINTS TO THE DEVELOPMENT OF HOUSING

### **Governmental Constraints**

Local policies and regulations affect the price and availability of housing and the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing. This section of the Housing Element examines the potential governmental constraints imposed by the City in the form of zoning, fees, and other restrictions, and determines whether these are constraints to the provision of housing.

<sup>22</sup> Based on actual costs of the Cathedral Palms affordable housing renovation project. Total \$52,104,458 for 224 units = \$232,609.19 per unit.

**Commented [KC12]:** Numerous additions made in this section per HCD comment item B.4 *Land-Use Controls*

It should be noted that constraints exist at other levels of government which the City has little or no control over. State and federal regulations related to environmental protection, prevailing wages for publicly assisted construction projects, construction defect liability, building codes, and other topics have significant, often adverse impacts on housing cost and availability for which the City has no ability to directly mitigate.

#### Residential Density

Land use policies are established in the Land Use Element of the General Plan and implemented through the Zoning Ordinance. The Land Use Element establishes the amount and distribution of different land uses and provides policies that guide residential development in the City. General Plan policies are implemented primarily through the Zoning Code with corresponding zoning that provides for a full range of residential types and densities that are dispersed throughout the City.

In addition to implementing the policies of the General Plan, the Zoning Code protects and promotes the health, safety, and general welfare of residents, as well as the preservation of the character and integrity of existing neighborhoods. The Zoning Ordinance allows varying residential densities according to the recently updated 2040 General Plan. The Cathedral City Land Use Element has designated roughly 6,558 acres (50 percent) of the City's total land inventory for a wide range of residential densities, including the following:

- HR - Hillside Reserve (1du/20ac)
- ER - Estate Residential (0-2du/ac)
- RL - Low Density Residential (2-4.5du/ac)
- RR - Resort Residential (3-6.5du/ac)
- RM - Medium Density Residential (4.5-10du/ac)
- RMH - Medium-High Density Residential (11-20du/ac)
- RH - High Density Residential (20-24du/ac)
- MU-N – Mixed-Use Neighborhood (up to 25du/ac)
- MU-U – Mixed-Use Urban (up to 45du/ac, limited to NSSP area)

After the Housing Element Update has been adopted, the City's next step is to conduct a more comprehensive update of the Zoning Code and Zoning Map that will establish complete zoning consistency with the General Plan and demonstrate a greater opportunity for the development of various types of housing to serve the needs of the community (see Program 2.F.1).

#### Density Bonus

The City currently incorporates the State Density Bonus requirements for affordable housing as set forth in California Government Code Sections 65915 through 65918. The density bonus allows residential unit density increases of up to 50 percent over the otherwise maximum permitted density under the zoning ordinance and land use element of the general plan. Overall, the density bonus provision reduces development constraints by allowing reductions in development standards, such as reduced parking standards.

Development Standards

The City's Zoning Ordinance regulates a wide range of development standards, including building height, lot size, and setbacks. The requirements of the City's Zoning Ordinance are listed in Table 39 below. The standards described below are consistent with, or more liberal than, many other Coachella Valley cities and generally do not pose a constraint to the development of housing.

Building Height

The City's height limits do not constrain a property owner's ability to achieve maximum densities allowed under the City's General Plan. Zoning standards allow for residences up to 26 feet in height in the R-1, R-2, and RM zones; 35 feet in height in the R-3 and R-4 zones with provisions for a 16 foot height increase under certain conditions; and up to 65 feet in height in the MU-N and MU-U zones.

Lot Size

The Zoning Ordinance sets minimum lot sizes for residentially zoned properties. The minimum lot size for residential zones varies from 7,200 square feet to two and a half acres, depending on zoning designation. These minimum lot sizes are not a constraint to housing production.

**Table 39**  
**Residential Standards**

Standard	R-1	R-2	RM	R-3	R-4	RR	DRN <sup>2</sup>	MXC <sup>2</sup>	MU-N <sup>3</sup>	MU-U <sup>3</sup>
Units/Acre	4.5	10	10	20	20	6.5	20-36	20-36	Max 45	Max 45
Lot Area	7,200 s.f.	8,000 s.f.	20,000 s.f.	30,000 s.f.	40,000 s.f.	2.5 ac	N/A	N/A	Varies	Varies
Building Lot Coverage	40%	50%	60%	60%	65%	40%	N/A	N/A	Varies	Varies
Setbacks:										
Front	20	15	15	15	15	10	10	0	Varies	Varies
Side (interior/street)	5/10	5/10	10/15	15	15	N/A	0	0/8-15		
Rear	15	15	10	15	15	N/A	N/A	N/A		
Private Outdoor Living Space	N/A	80 s.f./unit	400 s.f./unit	300 s.f./unit	300 s.f./unit	Varies	Varies	Varies	Varies	Varies
Building Height	26 ft.	26 ft.	26 ft.	35 ft. <sup>4</sup>	35 ft. <sup>4</sup>	50 ft. <sup>5</sup>	36 ft. <sup>6</sup>	Min: 20ft Max: 55ft <sup>7</sup>	65' or 5 stories	65' or 5 stories
Parking <sup>1</sup>	2	2; 1.5 for 5+ du	1.5	1.5	1.5	1.5-2	1-2	1-2	Varies	Varies

Source: Cathedral City Zoning Ordinance, 2020

1. Parking represents total parking requirement. For Plan Unit Developments and multi-family projects in the DRN zone, guest parking is required at 1 per unit.
2. Density in the DRN and MXC zones is based on parcel size. For lots of 10,000 to 20,999 square feet, a density of 20 units/acre is permitted; for lots of 21,000 to 41,999 square feet, a density of 27 units/acre is allowed; and for lots of more than 42,000 square feet, a density of 36 units/acre is allowed.
3. Development standards for the MU-N and MU-U are described in the North City Specific Plan and North City Extended Specific Plan
4. Provisions may be made based on adjoining zoning and the Planning Commission may permit an additional 16 feet in height.
5. The City Council may approve a height greater than fifty feet for that portion of a building greater than two hundred feet from the district boundary upon making a finding that such an increase will not adversely affect adjacent properties.
6. Additional height may be approved for buildings constructed above subsurface or surface parking, but in no case shall the overall height exceed forty-eight feet.
7. Additional height may be approved for buildings constructed above subsurface or surface parking, but in no case shall the overall height exceed sixty-eight feet.

Yards and Setbacks

As presented in Table 39, yard and setback requirements established in City’s Zoning Code are generally 15-20 feet for front yards, 10-15 feet for side yards, and 10-15 feet for rear yards. These setback requirements are like those of many communities, are tied to Fire Department accessibility in an emergency, and do not pose a significant constraint to housing development.

Building Lot Coverage

The City imposes reasonable limits on building coverage. The R-1 and RR zones have the lowest percentage of lot coverage at 40 percent, and the R-4 zone has the highest at 65 percent. The building coverage limit does not include enclosed parking or other accessory structures, unless they are part of the main building. With consideration of minimum lot sizes in each of these zones, this coverage allowance is sufficient to accommodate the permitted density for all residential development. Therefore, building coverage requirements do not impose a constraint on residential development.

Parking Standards

Off-street parking requirements vary by housing type. Table 39 lists the parking requirements for each residential use. Off-street parking facilities are required to be on the same lot or parcel of land as the structure they are intended to serve. For residential uses, parking cannot be located in required front and side yard setback areas. Parking standards do not present a constraint to the development of housing, because they generally are less than 2 per unit, and can be accommodated on multi-family projects of 2 and 3 stories, without encroachment into setbacks.

Allowance for Special Needs Housing

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all income levels and for persons with special needs, including single- and multi-family units, mobile homes, care facilities, senior housing, emergency shelters, transitional and supportive housing, single room occupancy, and accessory dwelling units (ADU). Table 39 summarizes the various housing types that are permitted within Cathedral City’s residential zone districts.

**Table 39**  
**Allowable Residential Uses by Zoning District**

Housing Type	RE	R1	R2	RM	R3	R4	RR	DRN	MXC	MU-U <sup>±</sup>	MU-N <sup>±</sup>
Single Family Dwelling	P	P	P	P	€	€	€	- <sup>2</sup>	-	-	-
Two Family Dwelling	-	-	P	P	-	-	€	-	-	-	-
Multi-Family Dwelling	-	-	P	P	P	P	€	P	€	€	€
Mobilehome Park	-	-	€	€	-	-	-	-	-	-	-
Emergency Shelters <sup>4</sup>	-	-	€	€	€	€	-	-	-	-	-
Supportive Housing	P	P	P	P	P	P	€	P	€	€	€
Transitional Housing	P	P	P	P	P	P	€	P	€	€	€

- Formatted: Justified, Space After: 8 pt, Don't keep with next, Don't keep lines together
- Formatted: Justified, Space After: 8 pt, Don't keep with next, Don't keep lines together, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers
- Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Justified, Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Justified, Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"
- Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"

**Table 39**  
**Allowable Residential Uses by Zoning District**

Housing Type	RE	R1	R2	RM	R3	R4	RR	DRN	MXC	MU-U <sup>1</sup>	MU-N <sup>4</sup>
Single-Room Occupancy	-	-	-	-	-	-	-	-	C	C <sup>2</sup>	C <sup>2</sup>
Secondary-Dwelling/ADU	C	C	C	C	C	C	C	C	-	-	C

Source: City of Cathedral City Zoning Ordinance, 2020. P= Permitted, C=Conditionally Permitted, - = Not Permitted

1. Mixed use designations within the North City Specific Plan: Mixed Use Urban (MU-U) and Mixed Use Neighborhood (MU-N)
2. Existing single-family may be retained or replaced on a legally non-conforming lot of record (Section 9.25.055)
3. Appropriateness to be determined by City Planner or designee.
4. Emergency homeless shelters are also permitted in the Institutional Housing Overlay District (P/IH)

Transitional and/or Supportive Housing

Transitional and/or Supportive Housing is defined as interim housing helping families move from homelessness to self-sufficiency by providing short-term housing at extremely low rent to qualified families. Currently, the City allows supportive housing by right in most of the residential zoning districts. However, these uses are conditionally permitted in the RR, MXC, MU-N and MU-U zones, which is considered a constraint to the provision of this type of housing. To remove this constraint, Program 2.F.1 was added requiring the City to update the Zoning Code to allow supportive housing by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code Section 65651.

Emergency Homeless Shelters

The City defines emergency homeless shelters as housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person in accordance with subdivision (e) of Section 50801 of the California Health and Safety Code. This use is currently permitted by right in the Institutional Housing Overlay District (P/IH), and conditionally allowed in the R2, RM, R3, and R4 zones of the City's Zoning Code. Emergency shelters are allowed subject to specific standards regarding security, lighting, parking, and operation in accordance with Government Code Section 65583 (a) (4). Recent updates to the Government Code will be incorporated into the City's Zoning Code as part of Program 2.F.1, including revision to parking requirements, to avoid potential constraints.

According to the Zoning Code, the P/IH is to be overlaid on certain I-1 (Light Industrial) districts. According to the General Plan Update, there is a total of 761.38 acres designated Industrial and 688.40 acres are vacant. Most of the land is located North of I-10; however, there is no mapping of the P/IH overlay district, and it cannot be determined if the available acreage or sites are in proximity to services. The lack of mapping is considered a constraint to the provision of this housing type. To remove these constraints, Program 2.F.1 requires the City to identify sites and provide mapping of the overlay district to ensure there are sufficient resources to meet the requirements of the Government Code.

Formatted: Justified, Space After: 8 pt, Don't keep with next, Don't keep lines together

Formatted: Justified, Space After: 8 pt, Don't keep with next, Don't keep lines together, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers

Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"

Formatted: Space After: 8 pt, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 0.18" + 0.3"

Formatted: Space After: 8 pt, Don't keep with next, Adjust space between Latin and Asian text, Adjust space between Asian text and numbers, Tab stops: Not at 1.46"

Formatted: Space After: 8 pt

Commented [KC13]: Added per HCD letter item B3  
Permanent Supportive housing

New Program added

Commented [KC14]: Added per HCD letter item B3  
Emergency Homeless Shelter

New Program Added

#### Single-Room-Occupancy

The City defines single room occupancy (SRO) facilities as structure consisting of six or more units, each of which is designed for occupancy by no more than two persons, which also has bathing facilities, that may or may not have partial kitchen facilities, and which is occupied as a primary residence by its occupants. Often, these units have rental rates that are affordable to low and sometimes extremely low-income individuals. This use is conditionally allowed in the Mixed-Use zones and requires a written agreement between the city and the operator of the facility addressing the provision of on-site management, written rules for residents, implementation of a security plan, and ongoing maintenance of the structures and landscaping.

Restricting SRO facilities to mixed-use zones and not allowing such use by-right is considered a constraint for the provision of this type of housing. To mitigate this constraint, Program 2.F.1 will require the Zoning Code be revised to allow SROs by right in the mixed-use zones and where multi-family residential units are permitted (see Table 41).

#### Employee Housing

The City does not currently define “employee housing” per the Employee Housing Act (Health and Safety Code, § 17000 et seq.), which can be considered a constraint to the provision of the type of housing. Program 2.F.1 has been included required that the City modify the Zoning Code to define and permit employee housing in single-family residential zoning districts for less than six persons.

#### Manufactured Housing

Pursuant to Government Code 65852.3, manufactured housing must be allowed by-right in all zones that allow single-family dwellings. Currently, the City’s Zoning Code restricts manufactured and mobile homes to the R2 and RM zones, which is considered a constraint to the provision of this type of housing. To remove this constraint, Program 2.F.1 is included to require the City to update the Zoning Code to allow and permit manufactured homes in the same manner as conventional stick-built structures are permitted.

#### Secondary Dwelling/Accessory Dwelling Units

The Zoning Code currently defines secondary units, or “accessory dwelling units” as they are commonly known, as a dwelling that meets the restrictions and requirements of Section 65852.2 of the California State Government Code, which includes a maximum area of one thousand two hundred square feet for a detached second dwelling, or thirty percent of the existing living area for an attached second dwelling. Second units provide a cost-effective means of serving additional development through the use of existing infrastructure and provide affordable housing for lower income households.

Currently, the City’s Zoning Code conditionally permits secondary dwelling units in residential zones. State law (SB 35) requires ministerial approval of second dwelling units under certain circumstances. The City’s current definition and zoning regulations of secondary dwelling units/accessory dwelling units is therefore considered a constraint to the provision of this type of housing. To remove this constraint, and in accordance with Government Code 65852.2, the City shall update the Zoning Code to establish criteria for ministerial consideration of second dwelling units and allow such units by-right in residential zones pursuant to Program 1.A.10 and Program 2.F.1.

**Commented [KC15]:** Added per HCD letter Item C2.

**Commented [KC16]:** Added per HCD letter item B3  
*Employee Housing*

**Commented [KC17]:** Added per HCD letter item B3  
*Mobilehome and Manufactured housing.*

**Commented [KC18]:** Added per HCD letter item B3  
*Accessory Dwelling units.*

#### Housing for Persons with Disabilities

The City's Zoning Ordinance Chapter 9.104 addresses reasonable accommodations for people with disabilities. The City established a formal procedure for approving requests for reasonable accommodation in 2002. Any person with a disability may apply for accommodations in the city's residential development standards by applying to the city planner or his or her designee on a form provided by the city. The Planning Department works with residents with disabilities to ensure their needs are addressed without compromising health and safety standards. Accessibility improvements are eligible activities under the City's various rehabilitation assistance programs. The City also collects fees on each business license for general public accessibility improvements.

**Commented [KC19]:** Added per HCD comment letter item B4 housing for persons with disabilities

The City adopted the California Building Code (CBC), 2019 Edition and no local amendments have been made which would limit housing opportunities for persons with disabilities. The City has not adopted any occupancy standards except for those prescribed in the CBC and Health and Safety Code.

The City does not currently define the term "group home," which is a home where a small number of unrelated people in need of care, support, or supervision can live together, such as those who are elderly or mentally ill. The Cathedral City Zoning Code defines a family as "an individual or two or more persons related by blood or marriage, or a group of not more than five persons, excluding servants, who are not related by blood or marriage, living together as a single housekeeping unit in a dwelling unit." This definition does not limit the number of related individuals living together; however, it does limit unrelated individuals living together to no more than five persons. This could potentially create a constraint to the provision of housing for those with disabilities. To remove this constraint, Program 2.F.1 has been included requiring the City's definition of "family" be updated to remove the limit of five persons. In addition, the term "group home" will be defined and allowed in all residential zones by-right in the same manner as other residential uses.

#### Short Term Vacation Rentals

Chapter 5.96 of the Municipal Code defines short term vacation rentals (STVR) as any privately owned qualifying residential dwelling unit or portion thereof, rented for occupancy, dwelling, lodging, or sleeping purposes for a period of thirty (30) consecutive days or less. Homeowners are required to obtain a permit and collect applicable transient occupancy taxes (TOT) at a rate of 12% of the rent charged. Chapter 5.96 also establishes a method to phase out STVRs within the city within two years effective October 9, 2020, except in: (a) common interest developments with established CC&Rs that do not prohibit STVRs; and (b) home sharing as permitted under Chapter 5.96 of the Municipal Code. STVRs provide homeowners with opportunities to increase their incomes, which can offset their housing costs. STVRs are often rented by vacationers rather than permanent residents, and the added TOT revenues are not considered a constraint to housing. Furthermore, because only privately owned homes and units within planned communities are allowed to have STVRs, and these communities contain only market rate units, the presence of STVRs in Cathedral City does not constrain the development of affordable housing.

#### Low Barrier Navigation Centers

Assembly Bill (AB) 101 requires that Low Barrier Navigation Centers (LBNC) be a by-right use in areas zoned for mixed use and nonresidential zoning districts permitting multifamily uses.

LBNCs provide temporary room and board with limited barriers to entry while case managers work to connect homeless individuals to income, public benefits, permanent housing, or other shelter. Program 1.B.5 has been added to assure that changes are made to the Zoning Ordinance.

Fees

The City’s Planning and Building Department fee schedules have been established as enterprise funds to recapture the City’s cost of processing development applications. Fees are commensurate with staff and resource costs. As such, fees imposed by the City are reasonable and do not represent a significant impact on the cost of construction. Fees for plan check and building permits are based on the valuation of the structure, as is consistent in most communities in California. City development fees are listed in [Table 40](#), and represent a total cost of about \$17,027 for a typical single-family house and about \$6,870 for a typical apartment unit [without application fees](#). [Application fees will vary depending on the type of development and level of environmental impact](#). The City’s impact fees are considerably less than surrounding jurisdictions and do not represent a constraint to development.

**Table 40**  
**Estimated Development Fees**

Development Process	Related Fee
<b>Legislative Applications:</b>	
• General Plan Amendment	\$2,570
• Development Agreement	\$5,000
• Change of Zone	\$2,570
• Change of Zone w/ GPA	\$7,650
• Zone Ordinance Amendment	\$2,570
• Specific Plan	\$5,950
• Specific Plan Amendment	\$2,980
• Annexation	\$16,260
<b>Development Applications:</b>	
• Conditional Use Permit	\$2,170
• Design Review	\$2,270
• CEQA Exemption	\$64
• Negative Declaration	\$1,540
• Environmental Impact Report	\$15,000
• Planned Unit Development	\$3,190
• PUD Amendment	\$2,000
• Tentative Tract Map	\$2,980 plus \$19 a lot
• Tentative Parcel Map	\$2,170 plus \$19 a lot
• Revised Tract/Parcel Map	\$1,030
• Reversion to Acreage	\$2,170
<b>Minor Development Applications</b>	
• Variance	\$2,170
• Variance - Administrative	\$110

**Commented [KC20]:** Table updated to include planning fees per HCD comment letter item B4 Fees

**Table 40**  
**Estimated Development Fees**

Development Process	Related Fee	
• 3-4 Residential Units	\$680	
• Time Extension	\$1,030	
• Design Review - Administrative	\$680	
• Non-Construction CUP	\$1,030	
• Conditional Use Permit - Revision	\$1,540	
<b>Miscellaneous</b>	<b>Single Family<sup>1</sup></b>	<b>Multi-Family<sup>2</sup></b>
• Plan check	\$675	\$136
• Building Permit	\$1,038	\$220
• Police/Fire	\$600	\$100
• General Plan	\$108	\$45
• Utility undergrounding	\$311	\$99
• Electrical	\$115	\$50
• Mechanical	\$51	\$40
• Plumbing	\$128	\$40
• School Fees	\$8,470	\$2,693
• Development impact fee	\$1,850	\$1,850
• T.U.M.F	\$2,310	\$1,330
• Transit development	--	\$13
• M.S.H.C.P.	\$1,371	\$254
<b>Total (per unit)</b>	<b>\$17,027</b>	<b>\$6,870</b>

Per-unit cost based on:

1. 2,076 square-foot single-family house
2. Based on a 75-unit apartment project with 660-sq.ft avg. unit size

Source: Cathedral City Building Department, 2020

**Commented [KC20]:** Table updated to include planning fees per HCD comment letter item B4 Fees

**Transparency in the Development Process**

The City has a variety of tools and resources for developers to increase transparency and certainty in the development application process as required by law. The City's Planning Department has a "Documents" home page that has links to the City's zoning ordinance, zoning map, planning and zoning services forms and fees schedules.

**Commented [KC21]:** Added per HCD comment letter item 4 Zoning, Development Standards and Fees

**Zoning for Lower-Income Households**

Housing Element law specifies that jurisdictions must identify sites to be made available through appropriate zoning and implement development standards to encourage and facilitate the development of housing for all economic segments of the community. This includes single-family homes, multi-family housing, second family units, manufactured housing, residential care facilities, emergency shelters, transitional housing, supportive housing, single room occupancy units (SROs), and farmworker housing.

**Commented [KC22]:** Per HCD letter item B3 zoning for lower income households.

Cathedral City provides for a wide range of housing types throughout the community. The Zoning Code stipulates the residential types permitted, conditionally permitted, or prohibited in each zone allowing residential uses. Permitted Uses are those uses allowed without discretionary review except for design review, in designated areas, as long as the project complies with all development standards. Conditional Use requires special consideration and approval from the Planning Commission approval because the use possesses unique characteristics or presents special issues that make being a permitted use impractical or undesirable. Typical findings of a CUP include that the project is consistent with the General Plan, the use is compatible with surrounding uses, addresses basic public health and safety, and general welfare concerns.

Table 41 summarizes the various housing types that are permitted within Cathedral City’s residential zone districts.

**Table 41**  
**Allowable Residential Uses by Zoning District**

Housing Type	RE	R1	R2	RM	R3	R4	RR	DRN	MXC	MU-U <sup>1</sup>	MU-N <sup>1</sup>
Single Family Dwelling	P	P	P	P	C	C	C	- <sup>2</sup>	-	-	-
Two Family Dwelling	-	-	P	P	-	-	C	-	-	-	-
Multi-Family Dwelling	-	-	P	P	P	P	C	P	C	C	C
Manufactured Homes/ Mobilehome Park	-	-	C	C	-	-	-	-	-	-	-
Emergency Shelters <sup>4</sup>	-	-	C	C	C	C	-	-	-	-	-
Supportive Housing	P	P	P	P	P	P	P	P	P	P	P
Transitional Housing <sup>4</sup>	P	P	P	P	P	P	P	P	P	P	P
Single Room Occupancy	-	-	-	-	-	-	-	-	C	C <sup>3</sup>	C <sup>3</sup>
Secondary Dwelling/ADU	C	C	C	C	C	C	C	C	-	-	C

Source: City of Cathedral City Zoning Ordinance, 2020. P= Permitted, C=Conditionally Permitted, --= Not Permitted  
 1. Mixed use designations within the North City Specific Plan. Mixed Use Urban (MU-U) and Mixed Use Neighborhood (MU-N)  
 2. Existing single-family may be retained or replaced on a legally non-conforming lot of record (Section 9.25.055)  
 3. Appropriateness to be determined by City Planner or designee.  
 4. Emergency homeless shelters and Transitional Housing are also permitted in the Institutional Housing Overlay District (P/IH)

Table 42 summarizes the land use decision-making authority in Cathedral City.

**Table 42**  
**Land Use Decision-Making Authority**

Approval Type	Decision-Maker				Estimated Processing Time
	Staff	Architectural Review Committee	Planning Commission	City Council	
Single-family detached	D				1 month
Single-family subdivision (2+ units)	R		R	D	7-8 months
Multi-family (5 or fewer units)	D				3 months
Multi-family (6+ units)	R	R	D		5-6 months
Mixed Use	R	R	D		3-4 months

R – Recommendation D – Decision  
 Processing time assumes project is consistent with General Plan and zoning

### Permit Processing

The time required to process a project varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. The City works closely with developers to expedite approval procedures so as not to put any unnecessary timing constraints on development. Applicants may request a pre-consultation meeting prior to the formal submittal of a development proposal, though it is not required for every project. A pre-consultation meeting typically includes the Planning and Building Department, Public Works, and the fire department. Then a tentative parcel map application or a description of project must be filed with a site plan, which is first reviewed by the planning department and other agencies such as public works for consistency with City ordinances and General Plan guidelines. Typical findings of a project or conditional use permit include that the project is consistent with the General Plan, the use is compatible with surrounding uses, addresses basic public health and safety, and general welfare concerns.

**Commented [KC23]:** Added/expanded per HCD  
Comment letter item B4 *Permit Processing and Procedures*

The average processing time for a typical application requiring design review is 3 to 4 months, which is generally less than many Valley cities, and does not represent a constraint to the cost or supply of housing. Individual single-family homes and other minor requests do not require design review approval and are checked by the Planning Division staff as part of the usual building plan check process. Processing time for these ministerial approvals is typically one month. The City requires Design Review approval for multi-family projects, which can be processed concurrently with any other permit that might be required. Projects with five or fewer units are approved administratively by staff with no public hearing, while the larger projects require approval by the Planning Commission. In the Mixed-Use Commercial Zone, multi-family residential projects require a conditional use permit, which includes a design review component.

Design reviews are primarily processed through either administrative action by the Architectural Review Committee (ARC) or Planning Commission action. The City's Architectural Review Committee is comprised of five community members. The Committee reviews the architecture, landscape, and hardscape design of projects as part of the review process. The design review process assures that a project's design meets the requirements of the zone in which it is located. The analysis focuses on the physical characteristics of the proposed development and not the appropriateness of the use itself. These design standards do not represent a constraint to development but are simply to ensure orderly and safe development in the City.

Any item that does not qualify for an administrative level of review will be acted upon by the Planning Commission. Design modifications based on the Architectural Committee's recommendations are made in advance of the Planning Commission presentation to streamline the Planning Commission hearing process. And although less frequently used, the City Council can also initiate a de novo review of any design review by requesting the item via the city manager to be on the next City Council agenda. This process allows the Council to add, modify, or delete any part of the project and/or conditions of approval.

A residential project, such as an apartment project, which is permitted in a zone requires only a design review. The design review is considered by either the Architectural Review Committee or the Planning Commission, depending on the type of project, and is reviewed solely for conformance with the Zoning Code. There are no findings associated with design review.

Therefore, if a project conforms to the Zoning Ordinance development standards for the zone in which it occurs, design review consists of a review of only objective development standards. The design review process is streamlined and objective in nature, and allows residential projects to proceed through entitlement in the most efficient manner, thereby saving developers time and money.

Compliance with the California Environmental Quality Act (CEQA) for non-exempt projects also requires a hearing and certification by the Planning Commission. The CEQA review focuses on the disclosure of environmental impacts and mitigation by the project proponent. Per state law, subdivisions and projects requiring an Environmental Impact Report (EIR) require City Council approval, which typically adds one or two months to the approval process.

Approval of a building permit typically takes 6 to 9 months to process. Site plans are circulated to the Fire Department, Engineering Department, and others for comment on the technical requirements of the proposal. The provision of adequate security increases the livability of the community by employing neighborhood watch, clear sight distances and similar techniques to assure a safe environment. Throughout construction, the building department will perform building checks to monitor the progress of the project. This process does not seem to put an undue time constraint on most developments because of the close working relationship between City staff, developers, and the decision-making body.

Since 2014, permits were issued for a total of 422 residential units, 415 of which were single-family units, 2 were duplex units, and 5 were multifamily units. Eight (8) accessory dwelling unit permits were issued in 2020. The City's permit processes do not appear to be a constraint to housing development approvals.

#### Building Code Compliance

Cathedral City has adopted the 2019 edition of the California Building Code with minor local administrative amendments primarily related, but not limited to the establishment of an enforcement agency, remedial procedures for various violations, and changes to miscellaneous development standard specifications such as more stringent pool and spa enclosure requirements. These local amendments are intended to streamline the enforcement process and enhance public health, safety, and welfare. The limited scope of the local amendments would not result in a significant cost increase to housing construction or serve to constrain housing development. The Building and Safety Department enforces the City's building codes under the administrative and operational control of the Chief Building Official

The City's Code Compliance Division is operated through the Planning and Building Department. A land owner is generally warned of a violation prior to the initiation of a citation and associated court action. Code Compliance staff make every effort to give as much time as possible to a violator to correct the problem. Depending on the severity of the offense, a warning will be accompanied with a deadline of 10 to 30 days for rectification. Property owners who are the subject of code enforcement complaints regarding housing condition can obtain information on potential City assistance available for repairs and improvements through the Community Development Department.

**Commented [KC24]:** Add per HCD comment letter item 4 Building Codes and Code Enforcement. Need to confirm with City if this is a correct characterization /summary of the amendments

### Infrastructure

The City's development patterns have resulted in the construction of major arterials and infrastructure throughout the City. Recently, the City expanded its infrastructure north of the freeway to facilitate buildout of The Crossings shopping center located at Bob Hope Drive and Varner Road. West of The Crossings, extension and expansion of infrastructure is planned for the North City area to facilitate future development of the North City and North City Extended Specific Plans.

The City requires, as do all communities in California, that a developer be responsible for all on-site improvements and meet the standards established in the City's Zoning Ordinance. Off-site improvements, should they be required, are also the responsibility of the developer. If a public street is required, the developer will be responsible for a half width improvement, including curb, gutter and sidewalk, as is typical in most communities. Minimum street right-of-way (full width) is normally 60 feet and minimum curb-to-curb pavement width is typically 36 feet. Since most of the city's major streets have been improved to their ultimate right-of-way, development of residential projects will generally only require the improvement of local or collector streets; the North City area is the exception.

Pursuant to SB 1087, the Desert Water Agency (DWA) and the Coachella Valley Water District (CVWD), both of which are water **and sewer** purveyors for the City, will be provided the adopted Housing Element and shall be required to establish specific procedures to grant priority service to affordable projects. As most water and sewer services are installed in most neighborhoods in the City, the City's water and sewer providers will not be constrained in providing services in most areas of the City. Portions of the developed Whitewater neighborhood and the Pomegranate Lane and Papaya Lane areas are the only areas of the developed City not currently served by the sewer system. These areas operate on septic tanks. Both DWA and CVWD have approved Urban Water Management Plans, which were prepared based on the City's General Plan build out. **These Plans state that both **service** providers have sufficient **water supplies and sewer capacity** available to meet the City's build-out demands, **including the units listed in the inventory**.**

**Commented [KC25]:** Clarified availability of sewer capacity per HCD comment letter item A: "Availability of Infrastructure"

### **Non-Governmental Constraints**

This section addresses the potential constraints not generated by governmental entities, including land costs, construction costs, financing costs, speculation, availability of infrastructure, and physical constraints.

### Construction Costs

The City has traditionally been somewhat lower in the cost of new home construction when compared to other Valley cities. In recent years, homes have cost between \$95 and \$125 per square foot to construct, depending on amenities and finishes. As of 2020, the average cost of developing an affordable housing project in the Coachella Valley is approximately \$317k per unit. These costs do not include land costs, which could raise the average cost per **unit** by approximately \$100k.

Building codes regulate new construction and substantial rehabilitation. They are designed to ensure that adequate standards are met to protect against fire, collapse, unsanitary conditions, and safety hazards. The City has adopted the 2019 edition of the California Building Code, which is typical of all local jurisdictions in California and therefore has not increased Cathedral City's

home building costs beyond that of other Valley cities. California state regulations, with respect to energy conservation, though perhaps cost effective in the long run, may add to initial construction costs.

Although construction costs are a significant portion of the overall development cost, the City can do little to mitigate its impact. Because construction costs in Cathedral City are similar to those in the area, the cost of construction is not considered a major constraint to housing production.

#### Land Costs

Land costs include the costs of raw land, site improvements, and all costs associated with obtaining government approvals. Fully developed, ready-to-build single-family lots are currently available at prices ranging from \$70,000 to \$100,000, depending on the size and location of the lot. The median sales price for existing homes as reported by the California Desert Association of Realtors (CDAR) and Palm Springs Regional Association of Realtors (PSRAR) was \$410,000 for single-family detached houses and \$195,000 for condominiums (attached houses).

#### Financing Costs

The availability of money or capital is a significant factor that can control both the cost and supply of housing. Two types of capital affect the housing market: 1) capital used by developers for site preparation and construction, and 2) capital for financing the purchase of units by homeowners and investors. Interest rates fluctuate in response to national factors. Although mortgage interest rates are at historic lows (2020), economic conditions have resulted in lending restrictions, making it difficult for Very Low, Low, and in some cases even Moderate-income first-time homebuyers to acquire sufficient savings and income to obtain to provide for a down payment, qualify for a loan, pay closing costs, and make monthly mortgage, and tax and insurance payments. Financing costs in Cathedral City are consistent with those of other communities throughout California.

**Commented [KC26]:** Added per HCD comment item B3  
*Zoning for Lower-Income Housing*

In addition to State and Federal funding programs, the City's Housing Successor Agency and the Planning and Building Department operate several programs and strategies for affordable housing. The City also cooperates with numerous County programs to provide rental assistance and to encourage the construction of new affordable housing (see Affordable Housing Programs sections).

#### Foreclosures

The "Great Recession" caused significant foreclosures throughout the Valley beginning in 2007/2008. The Inland Empire (San Bernardino and Riverside Counties combined) lost 140,200 jobs.<sup>23</sup> Over the past decade Riverside County has experienced a relatively prolonged recovery, slowly gaining momentum as the lost jobs were recovered. It wasn't until 2014 that employment in the County exceeded the number of jobs prior to the Great Recession.

This condition affected neighborhoods as foreclosed properties are not generally maintained and can affect surrounding property values. Conversely, they can present an opportunity for stable households, insofar as foreclosures are often priced below market rates and can provide affordable alternatives for moderate income households. Recently there has been upswing in housing prices,

<sup>23</sup> "Inland Empire Quarterly Economic Report," Year 31, October 2019, John E. Husing, Ph.D., Economic & Politics, Inc.

much of which is associated with residents and businesses being priced out of coastal Southern California and moving inland for more affordable housing and commercial property

#### Physical Constraints

Most of the area south of I-10 poses few physical constraints to development. The land is flat, urbanized, and the soils are suitable for urban uses. Areas north of the freeway are subject to physical constraints such as steep slopes, lack of infrastructure and flooding. High wind conditions in the northern portion of the City require the use of block walls which increases the cost of housing. Environmental constraints and physical constraints to development are further addressed in the Environmental Resources and the Environmental Hazards Element of the General Plan.

#### **Energy Conservation**

Title 24 of the California Building Code requires energy efficiency in all new construction of housing through design features, insulation, and active solar devices. The City applies the requirements of Title 24 to new housing developments, as is typical of most communities in California. The City also encourages implementation of energy conservation measures through design, including shade structures for eastern and western exposures, and the provision for shade trees and reduction in asphalt areas to protect against solar heating during summer months.

The City has taken proactive measures to reduce energy consumption. The City is also working on green building programs for affordable housing projects, although no established protocols have yet been developed. The City requires that all affordable housing proposals requesting assistance include green construction techniques and materials in their development plans.

The City will continue to balance green building costs with the long-term savings to residents to assure that green construction is employed wherever possible. Pressures in the marketplace from renters and buyers will also control the market for this type of residential product in the future.

#### **Water Conservation**

The Coachella Valley Water District (CVWD) and Desert Water Agency (DWA) both offer incentives to conserve water. Landscaping in the desert environment, especially turf, demand large quantities of water. In order to regulate unnecessary water consumption, the City and the water agencies have established water-efficient guidelines, incentives, and landscaping ordinances. Reducing water use on landscaping can be accomplished through installation of drought-resistant plant species and features that do not require minimal irrigation. Reduced water consumption can also be accomplished through the use of water-efficient appliances, faucets, and irrigation systems. Although certain water-efficient appliances and technologies may result in slightly higher initial costs, they are not expected to represent a significant constraint to affordable housing. These water-efficient appliances generally reduce monthly bills since less water is used.

#### **Public Participation**

[Public participation in preparation of the Housing Element is required under Government Code Section 65583\(c\)\(9\). This housing element was developed through the combined efforts of City staff, the City's Planning Commission, the City Council, and the City's consultant. The City's public outreach strategy consists of public reviews, stakeholder interviews, community meetings,](#)

**Commented [KC27]:** Updated per HCD phone call and HCD comment letter item E Public Participation

and public hearings. These outreach efforts were intended to solicit direct feedback from residents, developers, and organizations that represent the interests of low-income and special needs households or are otherwise involved in the development of affordable housing.

The draft Housing Element was uploaded to the City’s website on June 15, 2021 for public review and comment. The City conducted a virtual community workshop (due to the COVID-19 pandemic) for the Housing Element on January 12, 2021. The workshop invitation was distributed via email to 47 community groups, local and regional affordable housing organizations and other interested parties. In addition, the workshop was posted on the City’s events website and advertised in the Desert Sun newspaper. The workshop was attended by 20 people, ranging from City Council members, Commission members, affordable housing developers, residents and interested parties. Spanish translation was made available at meetings.

The conversation during the workshop was wide-ranging, and included discussion of:

- Concerns of the impacts of COVID-19 on families, their housing affordability, and economic conditions.
- Providing housing throughout the City, and the development potential of the North Sphere of Influence area.
- The impacts of short-term vacation rentals on availability of housing for long term occupancy.
- The difficulties of the affordable housing development community in providing very-low and extremely-low units because of the difficulties in funding.
- The need to streamline the entitlement process to assure that projects are processed quickly. It was agreed that Cathedral City’s process is efficient and not causing an issue.
- Considering the location of land inventory sites as it relates to funding source points – proximity to schools, shopping, etc., so that projects score better on funding applications.
- Providing gap financing through the “Lift to Rise” program.
- The need to joint venture projects (both public and private parties) to leverage applications.

The City also received a comment letter dated July 7, 2021 from the organization Lift to Rise. The comment letter provides strategy and policy recommendations for promoting affordable housing with the City. Below is a summary of concerns and recommendations outlined in the comment letter:

- When updating the sites inventory, the City should consider rent burden, regional equity, environmental justice and sustainability, access to infrastructure, and proximity to job opportunities, transportation, neighborhood amenities, educational institutions, and recreational resources.
- Emphasize the importance of project funding opportunities such as the Low Housing Tax Credit program.

The following table provides a summary of how the Housing Element addressed comments and concerns received during the public participation process.

**Table 43**  
**Response to Public Comments**

<u>Comment/Concern</u>	<u>Discussed/Addressed</u>
<u>Concerns of the impacts of COVID-19 on families, their housing affordability, and economic conditions.</u>	<u>Discussed under Economic Trends, <i>Housing Costs and Affordability</i></u>
<u>Providing housing throughout the City, and the development potential of the North Sphere of Influence area.</u>	<u>Discussed under Land Inventory, <i>North City Specific Plan</i>. Addressed Program 1.A.1</u>
<u>The impacts of short-term vacation rentals on availability of housing for long term occupancy.</u>	<u>Discussed under Governmental Constraints, <i>Short Term Vacation Rentals</i></u>
<u>The difficulties of the affordable housing development community in providing very-low and extremely-low units because of the difficulties in funding.</u>	<u>Discussed under Non-Governmental Constraints; <i>Affordable Housing Programs – Permanent Local Housing Allocation Program (PLHA)</i></u>
<u>Considering the location of land inventory sites as it relates to funding source points – proximity to schools, shopping, etc.. so that projects score better on funding applications.</u>  <u>City should also consider rent burden, regional equity, environmental justice and sustainability, access to infrastructure, and proximity to job opportunities, transportation, neighborhood amenities, educational institutions, and recreational resources.</u>	<u>Discussed under Affirmatively Forwarding <i>Fair Housing</i></u>
<u>Providing gap financing through the “Lift to Rise” program.</u>	<u>Discussion added under <i>Affordable Housing Programs, City and Local Programs</i></u>
<u>The need to joint venture projects (both public and private parties) to leverage applications.</u>	<u>Discussion added under <i>Affordable Housing Programs, City and Local Programs</i></u>
<u>Emphasize the importance of project funding opportunities such as the Low Housing Tax Credit program.</u>	<u>Discussed under <i>Affordable Housing Programs, State and Federal Programs</i></u>

The mailing list for public meetings, information flyer, newspaper advertising and associated materials are provided in Appendix C.

The second draft of the Housing Element was posted on the City’s website for public review in October of 2021. All those who were sent community workshop notices were notified of the availability of the document for public comment. Several comments were received via email on October 12, 2021 from Shelly Kaplan. The comments and response are as follows:

Comment: “Given the past year the housing values still seem low. You did provide updated rental costs for 2020 so it would be helpful to show updated housing costs as well. I would suggest at the housing cost section or on page 81 that you include the average price of home sales with unit counts for the past 12 months. As a result on III-19 the paragraph talking about affordable housing guidelines is misleading given the updated 2020 rental cost figures and perhaps that should be noted.”

Response: Regional median housing value trends from 2013 to 2019 are shown in Table 18. This information is from the current American Community Survey 5-Year Estimates which is the primary data source for all analysis within the Housing Element Update. Current, accurate information for housing costs and unit counts within the City for the year 2020 was not available at the time of this draft.

Comment: “On III-80 the land cost says \$100k per room - I think that might be per housing unit.”

Response: Text amended from “per room” to “per unit.”

Comment: “Finally a small typo on III-2 section 65581 (b) an extra “prepare”.”

Response: Typo corrected.

Finally, public hearings were held before the Planning Commission and City Council for the adoption of the Element, in December of 2021 and January of 2022.

The City will actively engage the community in the progress of the housing element implementation, including specifically working with developers, service providers and other community interests to accomplish the various implementing programs.

---

## GOALS POLICIES AND PROGRAMS

---

### GOAL 1

---

**A broad range of housing types located in all the City’s neighborhoods, which meet the needs of all existing and future households.**

***Policy 1.A***

*Ensure that sufficient residentially designated lands and appropriate zoning exist to meet the City’s future housing needs.*

**Program 1.A.1**

Maintain the list of affordable housing sites as shown in **Table 37**, Inventory of Available Vacant Lands, and update the list annually to include lands in the North City Specific Plan area as infrastructure is extended to this area.

**Responsible Agency:** Planning & Building Department

**Schedule:** Annually through 2029

**Program 1.A.2**

Maintain land use and zoning designations in the General Plan and zoning maps that allow for diversity of housing types and densities.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going throughout the planning period

**Program 1.A.3**

Maintain a Planned Unit Development (PUD) permit ordinance that allows flexibility in development standards to encourage housing construction while preserving natural resources.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going

**Program 1.A.4**

Negotiate the inclusion of affordable housing, including units targeted for extremely-low-income households when feasible, in Specific Plans, PUDs, and Tentative Tract Maps with each developer as application is made. [Assist and encourage housing for special needs groups such as seniors, large households, extremely low income, and homeless.](#) The negotiation may include the provision of financial incentives, if available, accelerated review process, or development standard concessions in exchange for deed restricted affordable units within each project with priority for projects that include extremely-low-income units.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going with each development application

**Program 1.A.5**

The City will provide technical assistance to property owners and developers in support of lot consolidation, including identifying opportunities for potential consolidation and incentives to encourage consolidation of parcels, as appropriate.

**Responsible Agency:** Planning & Building Department, Housing Successor Agency

**Schedule:** On-going as part of the development application process

**Program 1.A.6**

Promote development of mixed use projects in the Downtown area which combine high-density residential with local commercial services.

**Responsible Agency:** Housing Successor Agency, Economic Development

**Schedule:** On-going as part of the development application process; annual updates to the list of vacant and underutilized sites

**Program 1.A.7**

The City shall rezone Assessor's Parcel No. 680-190-037 (Site #9) from R-2 to R-3 to allow development of 141 units at a density of at least 16 units per site or 20 units per acre. Owner-occupied and rental multifamily residential development that have 20 percent of the units reserved for lower-income households shall be allowed by-right.

**Responsible Agency:** Planning & Building Department

**Schedule:** 2022

**Program 1.A.8**

The City shall implement the formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863 to ensure sufficient residential capacity is maintained to accommodate the current cycles RHNA. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City must identify replacement sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA.

**Responsible Agency:** Housing Successor Agency, Planning & Building Department

**Schedule:** On-going as part of the development application process

**Program 1.A.9**

The City shall develop incentives for subdividing large lots (10 acres or greater) to make the development of affordable housing projects more feasible while encouraging a range of development sizes. Affordable housing projects will be allowed by-right, and the City will consider fee waivers, flexible development standards, and expedited processing in its incentive program. The City shall continue to work with the owner and developer of site #2 to subdivide the 79-acre site to allow 7 acres for lower income housing, 6 acres of moderate-income housing, and 20 acres of above-moderate income housing.

**Responsible Agency:** Housing Successor Agency, Planning & Building Department

**Schedule:** Develop incentive package 2022-2023/. On-going as part of the development application process. City shall continue to work with the current landowner of site #2 until project approval.

**Program 1.A.10**

The City shall review, revise and/or create a secondary dwelling unit/accessory dwelling unit ordinance consistent with Government Code 65852.2. The Zoning Code shall be updated accordingly no more than 1 year after adoption of the Housing Element update.

**Responsible Agency:** Planning & Building Department

**Schedule:** Within 1 year of adopting the Housing Element update.

**Policy 1.B**

*Provide a sufficient variety of housing types to meet the housing needs of all residents, regardless of race, religion, sex, marital status, ancestry, sexual orientation, nationality, or color.*

**Program 1.B.1**

In order to reduce infrastructure cost, the City will encourage infill development in areas that are already serviced with adequate infrastructure, including streets and water and sewer lines and the remodeling or addition to existing homes to support build-out of the neighborhood through the use of expedited processing and financial incentives, if available.

**Responsible Department:** Planning & Building Department, Housing Successor Agency

**Schedule:** On-going as part of the development application process

**Program 1.B.2**

Work with private organizations -- including Urban Housing Communities, National Core, the Coachella Valley Housing Coalition, the Senior Center, DAP Health, Desert Arc or Braille Institute -- in assisting whenever possible in the housing of disabled residents or those with special housing needs in the City. The City shall consider fee waivers, reductions in development standards, or financial assistance if feasible.

**Responsible Agency:** Housing Successor Agency, Planning & Building Department

**Schedule:** [Annual outreach](#); On-going as part of the development application process

**Program 1.B.3**

Continue to enforce the provisions of the Federal Fair Housing Act. All complaints regarding discrimination in housing will be referred to the Riverside County Office of Fair Housing. Information on the Fair Housing Act, as well as methods of responding to complaints shall be made available at City Hall and at the Library.

**Responsible Agency:** Housing Successor Agency

**Schedule:** [Annual](#) coordination with the Riverside County Office of Fair Housing

**Program 1.B.4**

Continue to work with the Coachella Valley Association of Governments toward a regional solution for homelessness, including the Homeless Liaison Police Officers funded through the City.

**Responsible Agency:** City Manager's office, Housing Successor Agency, Police Department

**Schedule:** [Annual](#) coordination with CVAG. [City currently has two Homeless Liaison Officers](#)

**Program 1.B.5**

Consistent with the requirements of AB 101, amend the Zoning Ordinance to allow Low Barrier Navigation Centers in nonresidential and multifamily zones.

**Responsible Agency:** Planning & Building Department

**Schedule:** 2021-2022

**Program 1.B.6**

Work with the Coachella Valley Association of Governments to determine the need for affordable "Workforce Housing" and promote development of such.

**Responsible Agency:** City Manager's office, CVAG Workforce Housing Planning Committee

**Schedule:** [Annual](#) coordination with CVAG

**Policy 1.C**

*The City shall ensure that new and rehabilitated housing is efficient in its use of energy and natural resources.*

**Program 1.C.1**

New development and rehabilitation efforts will be required to incorporate energy efficiency through architectural and landscape design and the use of renewable resources and conservation of resources. If available, housing assistance funds shall be considered for projects which provide high levels of energy conservation for affordable housing. Expand the City's support for green building and LEED certified projects to encourage private development participation in these programs as part of future housing projects for all income levels through the pre-application and application review process.

**Responsible Agency:** Planning & Building Department, Environmental Conservation Division

**Schedule:** On-going as part of the development application process

**Program 1.C.2**

A list of known incentives for energy and water conservation measures shall be maintained by the Planning & Building Department and made available for developers and property owners at the City's reception desk and on the City's web site.

**Responsible Agency:** Planning & Building Department, Environmental Conservation Division

**Schedule:** Annual review and update of energy and water conservation measures

**Policy 1.D**

*Encourage the development of appropriate unit sizes in affordable multi-family rental projects and second units on single family lots.*

**Program 1.D.1**

Work closely with housing advocates and stakeholders to identify needs in the community based on household size, and develop and support projects that meet those needs. This should include the full range of potential units, from single-room-occupancy units to 4- and 5-bedroom units, depending on the need foreseen in the City during the planning period, through bond financing for affordable housing via the County Housing Authority or other appropriate means.

**Responsible Department:** Planning & Building Department; Housing Successor Agency

**Schedule:** Annual outreach to stakeholders as part of the Housing Element review process

**Policy 1.E**

*High-density, affordable and senior projects shall be located with convenient access to shopping, public transit, schools, parks, and public facilities such as streets and sidewalks.*

**Program 1.E.1**

Require developers of affordable and senior housing projects to confer with SunLine Transit regarding the provision of service to the project.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going as part of the development application process

**Program 1.E.2**

The City shall work with Riverside County and local non-profit organizations to support housing mobility and access to higher resource areas. High resource areas are those in proximity to transit, affordable housing, schools, employment centers, parks and other personal services. Services and or programs may include, but are not limited to, home loan assistance programs and rental assistance programs.

**Responsible Agency:** Housing Successor Agency

**Schedule:** On-going coordination with Riverside County and non-profit organizations

***Policy 1.F***

*Ensure that affordable housing projects are available for hotel and service industry employees.*

**Program 1.F.1**

Continue to work with CVAG and the Agua Caliente Band of Cahuilla Indians toward development of workforce housing, including tribal lands in the City which may be appropriate for affordable housing.

**Responsible Agency:** Planning & Building Department, City Manager's office

**Schedule:** On-going coordination with CVAG and Tribal government

---

**GOAL 2**

---

**Facilitate the development of affordable housing for extremely-low-, very-low-, low- and moderate-income households.**

***Policy 2.A***

*In order to leverage local investment, promote and facilitate the use of State and federal monies for the development and rehabilitation of affordable housing in the community.*

**Program 2.A.1**

The City shall encourage and assist self-help housing funded by non-profit organizations for single family, infill development.

**Responsible Agency:** Planning & Building Department; Housing Successor Agency

**Schedule:** On-going coordination as part of the development application process and annual Housing Element review

**Program 2.A.2**

Continue to distribute the City's information for developers and low income households which detail the programs available to both parties for assistance in the development and rehabilitation of low income housing at City Hall, the Senior Center, and the Desert Valleys Builders Association (DVBA) offices.

**Responsible Agency:** Planning & Building Department; Housing Successor Agency

**Schedule:** Annually update posting of information

**Program 2.A.3**

Should the City be notified of intent to sell or convert Nova Ocotillo Place, all possible funding sources, including CDBG funds and appropriate grant funds, if available, will be considered to facilitate purchase of such a project. All non-profit organizations that have expressed an interest in purchasing such projects, including the Riverside County Economic Development Agency Housing Authority and other non-profit groups will be notified immediately. Non-profit groups include but are not limited to National Core, Urban Housing Communities, Habitat for Humanity, and Community Preservation Partners. This will be done in accordance with AB 987. The City will communicate with the property owner at least one year prior to the earliest release date of affordability restrictions.

**Responsible Agency:** Housing Successor Agency

**Schedule:** On-going monitoring; coordination with owners of properties proposed for conversion and non-profit organizations one year prior to the earliest release date.

**Program 2.A.4**

The City will maintain its existing database of information on the 535 self-help ownership units in existence in the City, including current affordability status, year of potential conversion, and current ownership. This database will be used to encourage that these units be conserved at the same income level as they currently exist, following lapse of existing covenants. An annual report of the status of these units will be made to the Council.

**Responsible Agency:** Housing Successor Agency

**Schedule:** Database update in 2022. Updated annually thereafter.

**Program 2.A.5**

Work with Habitat for Humanity and the Coachella Valley Housing Coalition to identify locations and develop funding for self-help ownership housing units.

**Responsible Agency:** Planning & Building Department, Economic Development

**Schedule:** Establish strategy in 2022-2023, annually throughout planning period and as parcels become available.

**Program 2.A.6**

Review requests for density bonuses in affordable housing projects on the basis of its requirements.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going as part of the development application process

**Policy 2.B**

*The Housing Successor Agency shall expend housing set aside funds as effectively as possible to generate the development of new affordable housing units.*

**Program 2.B.1**

In older neighborhoods where extremely-low, low- and very-low-income households are a significant portion of the residents, consider the assignment of bond proceeds for the improvement of streets, water, sewer, and flood control improvements to bring these facilities into compliance with current standards.

**Responsible Agency:** Planning & Building Department, Engineering and Public Works

**Schedule:** On-going as part of the annual budget process

**Program 2.B.2**

Maintain the City's database of affordable housing projects and units, and the Housing Replacement Plan, and develop action plans should these units be converted or destroyed per AB 987.

**Responsible Agency:** Housing Successor Agency

**Schedule:** On-going as required by AB 987

**Program 2.B.3**

The Planning Division shall work with affordable housing development partners and the County Housing Authority to identify innovative housing solutions for extremely-low-, very-low-, low-income households and the elderly.

**Responsible Department:** Planning & Building Department

**Schedule:** On-going as part of the annual Housing Element review process

**Policy 2.C**

*Promote and preserve mobile home parks for their value as extremely-low-, very-low-, low- and moderate-income housing opportunities.*

**Program 2.C.1**

Any conversion of existing mobile home parks to permanent housing will continue to be regulated by ordinance to ensure that an appropriate relocation plan for park residents is developed and implemented. In addition, the City will seek to ensure that existing mobile home parks meet current standards until such time that they are converted to permanent housing.

**Responsible Agency:** Planning & Building Department, Housing Successor Agency, Code Compliance Division

**Schedule:** On-going Code Compliance Division, and as part of the Planning Department review of any proposal to convert a mobile home park

**Program 2.C.2**

Maintain a mobile home rent control ordinance which protects all mobile home residents who do not have long-term lease agreements.

**Responsible Agency:** Housing Successor Agency

**Schedule:** On-going per City ordinance

**Policy 2.D**

*Continue to redevelop the Downtown with higher density housing and encourage mixed use development where residential units are above commercial businesses.*

**Program 2.D.1**

Continue to pursue prototype higher-density housing in the Downtown area to further the concepts of mixed use in the urban core.

**Responsible Agency:** Planning & Building Department, Economic Development Department, City Manager's office

**Schedule:** On-going as part of the development review process and the annual Housing Element review

**Program 2.D.2**

Maintain provisions in the Zoning Ordinance that allow for residential uses in the second story of commercial centers in the Downtown area.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going per City ordinance

**Program 2.D.3**

The City shall develop incentives for consolidating smaller parcels to better accommodate affordable housing projects with focus on the Downtown area. The City shall consolidate all parcels that comprise site #1, #11, #12.

**Responsible Agency:** Planning & Building Department, Economic Development

**Schedule:** On-going as part of the development review process. Site #1 parcels shall be consolidated no more than 3 years after approval of this Housing Element update.

***Policy 2.E***

*The City shall encourage safe housing for all projects constructed in the City.*

**Program 2.E.1**

All proposed projects shall be reviewed by the Planning Department to ensure that adequate security and ‘defensible space’ is provided.

**Responsible Agency:** Planning & Building Department

**Schedule:** On-going as part of the development review process

**Program 2.E.2**

All existing assisted affordable housing projects will provide safe, defensible space accessible to the Police and Fire Departments.

**Responsible Agency:** Housing Successor Agency, Code Compliance Division, Police Department, Fire Department

**Schedule:** On-going as part of the inspection process

***Policy 2.F***

*The City shall remove governmental constraints to development affordable housing by regularly reviewing the Zoning Code and updating as necessary.*

**Program 2.F.1**

To remove governmental constraints to the development of affordable housing, a comprehensive update of the Zoning Code and Zoning Map shall be completed within 2 years of the approval of the housing element to ensure complete zoning consistency with the General Plan and to remove governmental constraints to the provision of all housing types.

- Allow transitional and supportive housing by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code Section 65651.
- Update Zoning Code map to include P/IH overlay zone
- Update emergency shelter parking standards per Government Code Section 65583 (a) (4).

- Add ministerial considerations for second dwelling/accessory dwelling units and permit by-right in residential zones pursuant to Government Code Section 65852.2.
- Update the definition of “family” to remove the limit of five unrelated persons.
- “Group homes” shall be defined and allowed in all residential zones by-right in the same manner as other residential uses.
- “Employee housing” shall be defined and permitted by right if 6 or fewer dwelling units. 7 or more dwelling units will be permitted per similar dwelling types of the same size in the same zone.
- “Manufactured homes” should only be subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to, with the exception of architectural requirements, for roof overhang; roofing material; and siding material (Gov. Code, § 65852.3, subd. (a)). However, any architectural requirements for roofing and siding material shall not exceed those which would be required of conventional single-family dwellings constructed on the same lot (Gov. Code, § 65852.3, subd. (a)).
- Affordable Housing Streamlined Approval (SB 35): Establish a streamlined, ministerial review process for qualifying multi-family residential projects.

**Responsible Agency:** Planning & Building Department

**Schedule:** 2022-2023

**Commented [KC28]:** Per HCD comment Letter item 4 SB 35 Streamlined...

---

### GOAL 3

---

#### **The maintenance and rehabilitation of the City’s residential neighborhoods.**

##### **Policy 3.A**

*Ensure that the quality of dwelling units in existing neighborhoods is improved, conserved, rehabilitated and maintained.*

##### **Program 3.A.1**

All City codes, including the California Building Code, will be enforced in the City’s Building Division and Code Compliance Division, so that existing units are maintained in good repair.

**Responsible Agency:** Planning & Building Department; Code Compliance Division

**Schedule:** Ongoing enforcement

##### **Program 3.A.2**

The City shall develop a Housing Rehabilitation Program that provides access to low interest loans funded by CDBG funds to low-income families who need to make improvements to make their homes safe to occupy. As part of this new program, the City shall also conduct a City-wide windshield survey every 3 years to identify general housing conditions to estimate the number of residential structures in need of rehabilitation or replacement. The program should target short-, medium-, and long-range plans for the rehabilitation of existing units, and the development of quality single-family housing. Special attention should be made to the area north of Dinah Shore Drive, generally west of Date Palm Drive, known as the Whitewater neighborhood. The City shall strive to assist 40 very low- and low-income households during the planning period.

**Responsible Agency: Housing Successor Agency, Code Compliance Division**

**Schedule: Develop the Housing Rehabilitation Program no more than 1 year after approval of the housing element update. The Program shall include a schedule for windshield surveys 3 years apart. Code enforcement is on-going.**

**Program 3.A.3**

Maintain an inventory that lists existing neighborhoods with substandard infrastructure, including partially paved roads, substandard water lines, flooding problems, absence of sewer service and lack of street lighting, quantify the need for improvements and identify funding sources.

**Responsible Agency:** Planning & Building Department, Public Works Division

**Schedule:** Once every 5 years

**Program 3.A.4**

The Code Compliance Division shall continue to maintain and upgrade living conditions in those neighborhoods with serious endemic problems to ensure safe, sanitary, and healthy living condition throughout all neighborhoods of the City through existing and future programs such as the Graffiti Elimination Program.

**Responsible Agency:** Planning & Building Department, Code Compliance Division, Engineering & Public Works Department

**Schedule:** Ongoing

This page intentionally left blank.

**Appendix A**  
**Evaluation of the Prior Housing Element**

This page intentionally left blank.

**Table A-1  
Housing Element Program Evaluation 2014-2019  
City of Cathedral City**

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b><i>GOAL 1: A broad range of housing types located in all the City's neighborhoods, which meets the needs of all existing and future households.</i></b>				
<b><i>Policy 1.A</i></b>				
<b><i>Ensure that sufficient residentially designated lands and appropriate zoning exist to meet the City's future housing needs.</i></b>				
<b>Program 1.A.1</b> Maintain the list of affordable housing sites as shown in Table III-15, Inventory of Available Vacant Lands, and update the list annually to include lands in the North City Specific Plan area as infrastructure is extended to this area.	Community Development Department	Annually through 2021	The list of affordable housing sites is updated periodically. A current update is underway.	Continue
<b>Program 1.A.2</b> Maintain land use and zoning designations in the General Plan and zoning maps that allow for diversity of housing types and densities.	Community Development Department	On-going	Land use and zoning designations were maintained. The 2040 General Plan Update will increase potential housing units from 32,834 to 33,396 potential units at buildout.	Continue
<b>Program 1.A.3</b> Maintain a Planned Unit Development (PUD) permit ordinance which allows flexibility in development standards to encourage housing construction while preserving natural resources.	Community Development Department	On-going	PUD ordinance was maintained.	Continue
<b>Program 1.A.4</b> Negotiate the inclusion of affordable housing, including units targeted for extremely-low-income households when feasible, in Specific Plans, PUDs, and Tentative Tract Maps with each developer as application is made. The negotiation may include the provision of financial incentives, if available, accelerated review process, or development standard concessions in exchange for deed restricted affordable units within each project with priority for projects that include extremely-low-income units.	Community Development Department	On-going with each development application	No inclusionary housing has been required on any project to date within the 5 <sup>th</sup> Cycle RHNA.	Continue

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<p><b>Program 1.A.5</b> The City will provide technical assistance to property owners and developers in support of lot consolidation, including identifying opportunities for potential consolidation and incentives to encourage consolidation of parcels, as appropriate.</p>	Community Development Department, Housing Successor Agency	On-going as part of the development application process	Emphasis on lot consolidation for Downtown properties, three of which are greater than 6 acres (Grit Development; Cat Canyon Development; Cathedral Cove Development of 13.5 Acres), as well as the Newport 5, Mountain View, River Canyon and The District residential projects.	Continue
<p><b>Program 1.A.6</b> Promote development of mixed-use projects in the Downtown area which combine high-density residential with local commercial services. Post a list of vacant or underutilized residential sites on the City web site as part of a page dedicated to development opportunities in the Downtown area.</p>	Housing Successor Agency, Economic Development	On-going as part of the development application process; annual updates to the list of vacant and underutilized sites	The City, specifically the Economic Development Division, continually promotes the Downtown area for high-density mixed-use development. Available parcels are posted and promoted on the City's website. Meetings and negotiations with property owners and interested developers are ongoing. Several potential mixed-use development proposals have been discussed and pursued through the entitlement phase, although none have been completed to date.	Continue
<p><b>Program 1.A.7</b> The City shall rezone either Assessor's Parcel 677-050-017, which consists of 14.69 acres and could generate 294 units; or Assessor's Parcel 677-050-018, which consists of 18.12 acres, and could generate 362 units to address the unaccommodated need from the prior planning period. Pursuant to Government Code Section 65583.2(h), the rezoned site will allow rental and owner multifamily uses by right and require a minimum density of 20 units per acre.</p>	Community Development Department	2014	<p>Both parcels were re-zoned to R4 (High to High High-Density Multi-family) with a minimum density of 20 DUA and a maximum of 24 DUA.</p> <p>At the landowner's request, they were both re-zoned to R-3 (Medium to High Density Multi-family). R3 allows for a maximum density of 20 DUA.</p> <p>The change in zone results in a shortage of between 3 and 4 units per parcel, but only if the parcel(s) are developed to the maximum R3 density.</p>	Program to be continued for new sites. Inventory Site <a href="#">9</a> (APN 677-190-037) to be re-designated with General Plan Update to RH/R-3.

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>Policy 1.B</b> <i>Provide a sufficient variety of housing types to meet the housing needs of all residents, regardless of race, religion, sex, marital status, ancestry, sexual orientation, nationality, or color.</i>				
<b>Program 1.B.1</b> In order to reduce infrastructure cost, the City will encourage infill development and the remodeling or addition to existing homes wherever possible through the use of expedited processing and financial incentives, if available.	Community Development Department, Housing Successor Agency	On-going as part of the development application process	The City process for approval of a remodel or expansion of an existing home is a streamlined administrative process. No financial incentives have been available, but this ministerial approval process is significantly less cost prohibitive for an applicant than a discretionary review process.	Continue and combine with Program 1.B.2
<b>Program 1.B.2</b> Encourage in-fill development in areas that are already serviced with adequate infrastructure, including streets and water and sewer lines, to support build-out of the neighborhood. The City shall consider fee waivers, reductions in development standards, or financial assistance if feasible.	Community Development Department	On-going as part of the development application process	The City process for approval of an in-fill development is a streamlined administrative process. No financial incentives have been available, but this ministerial approval process is significantly less cost prohibitive for an applicant than a discretionary review process.	Continue and combine this with Program 1.B.1
<b>Program 1.B.3</b> Work with private organizations -- including the Coachella Valley Housing Coalition, Shelter from the Storm, the Senior Center, Desert AIDS Project, Foundation for the Retarded or Braille Institute -- in assisting whenever possible in the housing of disabled residents or those with special housing needs in the City. The City shall consider fee waivers, reductions in development standards, or financial assistance if feasible.	Housing Successor Agency	On-going as part of the development application process; annual outreach	The City as Housing Successor Agency worked with Urban Housing Communities provided land for the project for a significantly reduced price and provided grant money for construction of a 60-unit affordable housing project for Veterans called Veterans Village at Cathedral City (special housing needs group).  The City as Housing Successor Agency is providing partial financing and forgiving a significant existing loan for Cathedral Palms extremely low and low income 224-unit senior housing project (special housing needs group).	Continue

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<p><b>Program 1.B.4</b> Continue to enforce the provisions of the Federal Fair Housing Act. All complaints regarding discrimination in housing will be referred to the Riverside County Office of Fair Housing. Information on the Fair Housing Act, as well as methods of responding to complaints shall be made available at City Hall and at the Library.</p>	Housing Successor Agency	On-going; annual coordination with the Riverside County Office of Fair Housing	The City has provided \$18,000 per year to the Riverside County office of Fair Housing (Inland Fair Housing) and refers all complaints regarding discrimination in housing to that office. Information for filing a complaint is provided on the City's website.	Continue
<p><b>Program 1.B.5</b> Continue to work with the Coachella Valley Association of Governments toward a regional solution for homelessness, through support of the Multi Service Center in North Palm Springs, and other efforts as they are developed.</p>	City Manager's office, Housing Successor Agency	On-going coordination with CVAG	<p>The City has provided \$103,000 per year to the Coachella Valley Association of Governments via CDBG Funds and the General Fund. Cooling Centers, such as at the Elk's Lodge, are made available during the seasonally hot months of the year.</p> <p>The City had one dedicated Homeless Liaison Police Officer that has now been expanded to two dedicated officers, both of whom are fully funded. These officers align needs of homeless individuals with available resources. They work to remove homeless individuals from outdoor encampments to permanent housing.</p>	Continue
<p><b>Program 1.B.6</b> Work with the Coachella Valley Association of Governments to determine the need for affordable "Workforce Housing" and to promote development of such.</p>	Community Development Department	Within one year of Housing Element adoption	Completed within one year of Housing Element (5 <sup>th</sup> Cyc) adoption (GPA 14-002).	Continue
<p><b>Program 1.B.7</b> Work with the Coachella Valley Association of Governments to determine the need for affordable "Workforce Housing" and promote development of such.</p>	City Manager's office, CVAG Workforce Housing Planning Committee	On-going coordination with CVAG	Code amendments were completed.	This program was completed and is no longer necessary.

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>Policy 1.C</b> <i>The City shall ensure that new and rehabilitated housing is efficient in its use of energy and natural resources.</i>				
<b>Program 1.C.1</b> New development and rehabilitation efforts will be required to incorporate energy efficiency through architectural and landscape design and the use of renewable resources and conservation of resources. If available, housing assistance funds shall be considered for projects which provide high levels of energy conservation for affordable housing. Expand the City's support for green building and LEED certified projects to encourage private development participation in these programs as part of future housing projects for all income levels through the pre-application and application review process.	Community Development Department, Environmental Conservation Division	On-going as part of the development application process	Handled as part of a project's ministerial or discretionary approval process. Architectural and landscape design are reviewed for energy and water efficiency, with many post development applications processed for solar panel installation and drought tolerant landscape conversions. Housing assistance funds have not been available through the City.	Continue
<b>Program 1.C.2</b> A list of known incentives for energy and water conservation measures shall be maintained by the Community Development Department and made available for developers and property owners at the City's reception desk.	Community Development Department, Environmental Conservation Division	Annual review and update of energy and water conservation measures	The City's Public Works Department maintains a list of resources for energy and water conservation measures.	Continue
<b>Policy 1.D</b> <i>Encourage the development of appropriate unit sizes in affordable multi-family rental projects and second units on single family lots.</i>				
<b>Program 1.D.1</b> Work closely with housing advocates and stakeholders to identify needs in the community based on household size, and develop and support projects that meet those needs. This should include the full range of potential units, from single-room-occupancy units to 4- and 5-bedroom units, depending on the need foreseen in the City during the planning period, through bond financing for affordable housing via the County Housing Authority or other appropriate means.	Community Development Department; Housing Successor Agency	Annual outreach to stakeholders as part of the Housing Element review process	Monthly meetings, "City Hall at Your Corner," where City Council /City Manager go out into the community and have open discussions regarding areas of concern in community  Specific projects to accommodate housing needs include Cathedral Palms, which was funded in the previous (5 <sup>th</sup> ) cycle and Veteran's Village at Cathedral City currently under way.  Working in partnership with Riverside County to help identify housing needs for Cathedral City.	Continue

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>Policy 1.E</b> <i>High-density, affordable and senior projects shall be located with convenient access to shopping, public transit, schools, parks, and public facilities such as streets and sidewalks.</i>				
<b>Program 1.E.1</b> Require developers of affordable and senior housing projects to confer with SunLine Transit regarding the provision of service to the project.	Community Development Department	On-going as part of the development application	Sunline has been notified of all proposed projects, including affordable and senior housing projects, to determine whether or not service/turnouts are required to be provided if this is not already being done. The City includes any required physical changes in the project's "conditions of approval" for implementation by the developer (case-by-case). Sunline uses the development data to determine any necessary existing or future changes to service. All proposed projects continue to be discussed with SunLine, to determine whether or not service/turnouts will be required.	Continue
<b>Policy 1.F</b> <i>Ensure that affordable housing projects are available for hotel and service industry employees.</i>				
<b>Program 1.F.1</b> Continue to work with CVAG and the Agua Caliente Band of Cahuilla Indians toward development of workforce housing, including Tribal lands in the City which may be appropriate for affordable housing.	Community Development Department	On-going coordination with CVAG and Tribal government	The City has been an active participant in CVAG's Homeless Task Force and has contributed toward development of homeless housing solutions in the Coachella Valley. The majority of vacant Indian-controlled parcels in the City are allotted and outside the control of the Agua Caliente Tribal Council; however, the Tribe's development of the Downtown casino presents an opportunity for partnering on workforce housing opportunities.	Continue

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>GOAL 2: Facilitate the development of affordable housing for extremely-low-, very-low-, low- and moderate-income households.</b>				
<b>Policy 2.A</b> <i>In order to leverage local investment, promote and facilitate the use of State and federal monies for the development and rehabilitation of affordable housing in the community.</i>				
<b>Program 2.A.1</b> The City shall encourage and assist self-help housing funded by non-profit organizations for single family and infill development.	Housing Successor Agency	On-going coordination as part of the development application process and annual Housing Element review	None between 2014-2019 (possibly due to the recession)	Continue under the Community Development Department
<b>Program 2.A.2</b> Continue to distribute the City's information for developers and low-income households which detail the programs available to both parties for assistance in the development and rehabilitation of low income housing at City Hall, the Senior Center, and the Desert Valleys Builders Association (DVBA) offices.	Housing Successor Agency	On-going posting of information	No materials/programs are currently available from the City. The City's website refers to Riverside County's assistance/materials/programs.	Continue under the Planning and Building Department
<b>Program 2.A.3</b> Should the City be notified of intent to sell or convert any at-risk affordable housing developments, all possible funding sources, including CDBG funds and appropriate grant funds, if available, will be considered to facilitate purchase of such a project. All non-profit organizations that have expressed an interest in purchasing such projects, including the Riverside County Economic Development Agency Housing Authority and other non-profit groups will be notified immediately of any such properties for sale or at risk of losing affordability restrictions. This will be done in accordance with AB 987. The City will communicate with the property owner at least one year prior to the earliest release date of affordability restrictions.	Housing Successor Agency	On-going monitoring; coordination with owners of properties proposed for conversion and non-profit organizations one year prior to the earliest release date.	Monitoring is ongoing; no notification has been received within the 5th Cycle RHNA of an intent to convert or sell any at risk affordable housing developments. The City is financially participating in the renovation of the Cathedral Palms housing development	Continue under the Community Development Department

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<p><b>Program 2.A.4</b> Maintain and update the database of infill lots throughout the community that would be appropriate for the development of affordable housing for extremely low, very low and low income households, including self-help ownership housing. Promote these parcels in the development community, through brochures, potential streamlined processing incentives, and other means.</p>	Community Development Department	On-going notification as part of the annual Housing Element review process	The City promoted the sale of individual parcels owned by the City, and although the transactions did not have an affordability restriction, the funds received from the sales in total were consolidated and incorporated into the cost of renovating the Cathedral Palms housing project and the development of Veteran's Village at Cathedral City – two significant affordable housing projects. The database has been and continues to be maintained.	Continue under the Community Development Department
<p><b>Program 2.A.5</b> Review requests for density bonuses in affordable housing projects on the basis of its requirements.</p>	Community Development Department	On-going notification as part of the annual Housing Element review process	The City's Density Bonus Ordinance is in conformance with state law. No density bonuses have been applied during the 5 <sup>th</sup> Cycle	Continue
<p><b>Policy 2.B</b> <i>The Redevelopment Agency shall expend housing set aside funds as effectively as possible to generate the development of new affordable housing units.</i></p>				
<p><b>Program 2.B.1</b> In older neighborhoods where extremely-low, low- and very-low-income households are a significant portion of the residents, consider the assignment of bond proceeds for the improvement of streets, water, sewer, and flood control improvements to bring these facilities into compliance with current standards.</p>	Community Development Department	On-going as part of the annual budget process	Septic systems were replaced in the Cathedral City Cove, Dream Homes, and the 35th Avenue Districts with sewers during or before the 2004-2007 4th Cycle RHNA. The sewers continued to be improved and maintained during the 5th Cycle to ensure that they remain in compliance with current standards. New streets on top of sewers helped with flood control improvements. CDBG eligible funds have been used to install streets, curbs, gutters and sidewalks in low- and moderate-income areas.	Program to be modified to address remaining areas.
<p><b>Program 2.B.2</b> Maintain the City's database of affordable housing projects and units, and the Housing Replacement Plan, and develop action plans should these units be converted or destroyed per AB 987.</p>	Housing Successor Agency	On-going as required by AB 987	A database of affordable housing projects and units is maintained on the City's website in accordance with AB 987. No new units are planned to be converted or destroyed.	Continue

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<p><b>Program 2.C.2</b> The Planning Division shall seek to identify innovative housing solutions for extremely-low-, very-low-, low-income households and the elderly.</p>	Community Development Department	On-going as part of the annual Housing Element review process	<p>City is supportive of affordable housing developers, however the City does not take the lead on “innovative housing solutions.”</p> <p>The City works in partnership with the Riverside County Office of Fair Housing and the Coachella Valley Association of Governments to identify and facilitate innovative housing solutions, such as comprehensively addressing the needs of the homeless, not only in Cathedral City but Valley-wide.</p> <p>Through the sale of individual parcels, the City was able to secure funds that were then used to renovate the Cathedral Palms housing to benefit a greater number of lower income and elderly residents.</p>	<p>Continue partnership with Riverside County to address this program.</p> <p>Change Program numbering to 2.B.3</p>
<p><b>Policy 2.D</b> <i>Promote and preserve mobile home parks for their value as extremely low, very low, low and moderate income housing opportunities.</i></p>				
<p><b>Program 2.D.1</b> Any conversion of existing mobile home parks to permanent housing will continue to be regulated by ordinance to ensure that an appropriate relocation plan for park residents is developed and implemented. In addition, the City will seek to ensure that existing mobile home parks are meet current standards until such time that they are converted to permanent housing.</p>	Community Development Department, Housing Successor Agency, Code Compliance	On-going as part of the review of any proposal to convert a mobile home park	This program continues to be implemented. To date, there have been no mobile home park conversions within the 5 <sup>th</sup> Cycle RHNA.	Continue
<p><b>Program 2.D.2</b> Maintain a mobile home rent control ordinance which protects all mobile home residents who do not have long-term lease agreements.</p>	Housing Successor Agency	On-going per City Ordinance 48	This program continues to be implemented.	Continue

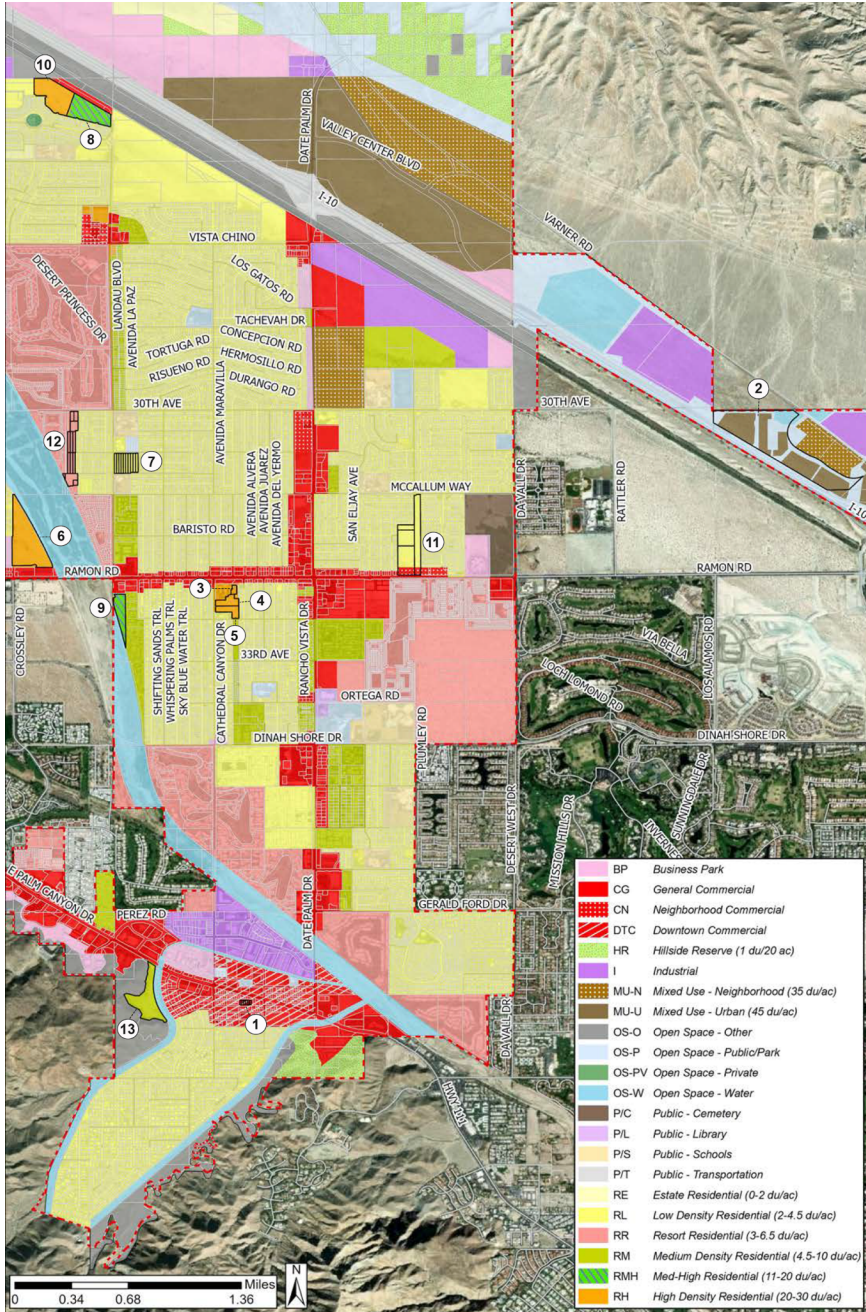
Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>Policy 2.E</b> <i>Continue to redevelop the Downtown with higher density housing and encourage mixed use development where residential units are above commercial businesses.</i>				
<b>Program 2.E.1</b> Continue to pursue prototype higher-density housing in the Downtown area to further the concepts of mixed use in the urban core.	Community Development Department, City Manager's office	On-going as part of the development review process and the annual Housing Element review	The City has, and continues to have, ongoing meetings with developers who desire to take advantage of the higher density zoning within the City's downtown zones. Several mixed-use housing project plans have been submitted and reviewed by the City during the 5 <sup>th</sup> Cycle; however, no projects were taken through to the development phase. The City continues to maintain the higher density zoning in its Downtown core to encourage such uses where the necessary infrastructure exists.	Continue
<b>Program 2.E.2</b> Maintain provisions in the Zoning Ordinance which allow for residential uses in the second story of commercial centers in the Downtown area.	Community Development Department	On-going per City ordinance	This program continues to be implemented.	Continue
<b>Policy 2.F</b> <i>The City shall encourage crime-free housing programs for all projects constructed in the City.</i>				
<b>Program 2.F.1</b> All projects shall be reviewed by the Police and Fire Departments to ensure that adequate security and 'defensible space' is provided.	Community Development Department, Police Department, Fire Department	On-going as part of the development review process	This program continues to be implemented.	Continue
<b>Program 2.F.2</b> All assisted affordable housing projects will comply with the precepts for Crime-Free Housing.	Housing Successor Agency, Community Development Department, Police Department	On-going as part of the development review process	This program continues to be implemented.	Continue. Modify program text to refer to "defensible space" and remove the term "Crime-Free Housing"

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<b>GOAL 3: The maintenance and rehabilitation of the City's residential neighborhoods.</b>				
<b>Policy 3.A</b> <b>Ensure that the quality of dwelling units in existing neighborhoods is improved, conserved, rehabilitated and maintained.</b>				
<b>Program 3.A.1</b> Maintain the Sewer Hook-up Assistance Redevelopment Program (SHARP), allowing grants and loan assistance programs for qualifying extremely-low-, very-low-, low-, and moderate-income households in order to encourage the rehabilitation of existing housing units as funding permits.	Housing Successor Agency, Community Development Department	Annual budget allocations as funding permits.  Funding limited/not available due to dissolution of Redevelopment Agency.	The SHARP Program was a program managed by the City's Administrative Services Department. When Cathedral City became an Entitlement city in 2012, the City offered CDBG revolving sewer loans to low and moderate-income residents. A small number of these applicants made payments on their loans while the City recuperated balance for other loans when the applicants refinanced or sold their properties.	Program was discontinued.
<b>Program 3.A.2</b> All City codes, including the California Building Code, will be enforced in the City's Building Division and Code Compliance Division, so that existing units are maintained in good repair.	Community Development Department; Police Department/Code Compliance Division	On-going enforcement	This program continues to be implemented.	Continue. Remove "Police" from responsible agency and add "Planning and Building Department."
<b>Program 3.A.3</b> Develop a rehabilitation and neighborhood revitalization plan for that area north of Dinah Shore Drive, generally west of Date Palm Drive, known as the Whitewater neighborhood, which targets short-, medium-, and long-range plans for the rehabilitation of existing duplexes, and the development of quality single-family housing.	Community Development Department	2014-2016	Using CDBG Funds, street improvements have been completed for 3 residential blocks. Over the next two years, both CDBG and SBI Funds will be used to improve additional streets.	This program is ongoing.
<b>Program 3.A.4</b> Maintain an inventory that lists existing neighborhoods with substandard infrastructure, including partially paved roads, substandard water lines, flooding problems, absence of sewer service and lack of street lighting, quantify the need for improvements and identify funding sources.	Community Development Department, Public Works Division	Once every 5 years, to be completed prior to 2016	A Pavement Management Plan is prepared for implementation and an inventory of the City's streets and street conditions is maintained.  The City does not maintain inventory for water/sewer/flooding. SCE owns streetlights. City coordinates with CVWD, DWA, RivCo Flood Control District, etc. who are responsible for these individual systems.	This program is ongoing.

Program/Action	Responsible Agency	Schedule	Accomplishments	Future Policies and Actions
<p><b>Program 3.A.5</b> Analyze the development potential for the area northeast of East Palm Canyon and Golf Club Drive, and consider programming infrastructure improvements, including roadway improvements, signalization of Cree Road and East Palm Canyon Drive, and provision of sewer and water improvements to encourage development of affordable housing in the area.</p>	Community Development Department, Public Works Division	2014-2016	This area is nearly completely re-developed as a single-family residential community (The District and District East) and Assisted Living Facility (Horizon Gardens). The developer made roadway and drainage improvements in the areas fronting and off-site of the development and water and sewer purveyors to make the required infrastructure improvements.	Program was completed and is no longer necessary.
<p><b>Program 3.A.6</b> The Code Compliance Division of the Police Department shall continue to maintain and upgrade living conditions in those neighborhoods with serious endemic problems to ensure safe, sanitary, and healthy living condition throughout all neighborhoods of the City through existing and future programs such as the Graffiti Elimination Program.</p>	Graffiti Task Force, Police Department/Code Compliance Division	On-going	<p>Code Compliance and Public Works Divisions continue to operate and assist in upgrading those neighborhoods with serious endemic problems.</p> <p>The Graffiti removal program has been very successful in removing graffiti and maintaining clean and orderly buildings.</p>	Continue. Modify program text to indicate graffiti abatement is done by a 3 <sup>rd</sup> party vendor through the Public Works Department. No longer Police Department responsibility.
<p><b>Program 3.A.7</b> Bring to City Council the option of incorporating the Uniform Housing Code into the City's Municipal Code as a tool for Code Enforcement to encourage proper maintenance of owner-occupied and rental properties.</p>	Police Department/Code Compliance Division, Community Development Department	2014-2015	The City adopted the California Building Code (CBC) in place of the Uniform Housing Code. The CBC was incorporated into Chapter 8 of the City's Municipal Code. (ref. CCMC Section 8.02.030).	Program was completed and the UHC is now a tool used to encourage maintenance of residential structures.

**Appendix B**  
**Land Use Inventory Mapping**

City of Cathedral City  
General Plan/Housing Element



April 2021

III-112

Commented [KC29]: Revised map dated 9.3.21

Land Use Maps on File at the Planning Department

This page intentionally left blank.

## Appendix C

### Public Participation

Section 65583(c)(9) of the *Government Code* states that "The local government shall make a "diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." The City held an outreach workshop on January 12, 2021. In order to reach as many people as possible, the City advertised the workshop in the Desert Sun newspaper, on its website and Facebook page, and sent out notices and flyers to community leaders, affordable housing developers, and members of the clergy who are active in City housing issues. A total of 34 persons participated in the workshop, discussing a number of topics, including:

- The impact of short term rentals on permanent housing in the City.
- That housing of all types should be provided throughout the City, not only on the edges.
- That the north end of the City provides good opportunities for housing in the longer term.
- That creative housing options, including container houses and tiny houses should be considered.
- That a smooth entitlement process and a clear inventory of sites are important to the affordable housing development community.
  - That the inventory should make sure to consider availability of school, transit and shopping so that projects score well on competitive funding applications.
- That the demand for housing will be affected by the long term changes now occurring in retail commercial development, and the greater use of online shopping.
- That the affordable housing development community is finding that the multiple sources of funding required to cover the costs of projects are extending the time required to get projects off the ground.
- That Cathedral City's entitlement process is not burdensome and does not extend the time needed to entitle a project.
- That Lift to Rise's new funding program could help affordable housing projects with gap financing in the future.

The second draft of the Housing Element was posted on the City's website for public review in October of 2021. All those who were sent community workshop notices were notified of the availability of the document for public comment. Several comments were received via email on October 12, 2021, from Shelly Kaplan, including two typo corrections and one comment about current (last 12 months) housing prices.

Finally, public hearings were held before the Planning Commission and City Council for the adoption of the Element, in December of 2021 and January of 2022.



**Subject:** Cathedral City Housing Element Update - Virtual Community Workshop Notice - Join us!  
**Date:** Tuesday, January 5, 2021 at 10:20:50 AM Pacific Standard Time  
**From:** Kimberly Cuza <kcuza@terranovaplanning.com>  
**BCC:** Andrew@greendev.co <Andrew@greendev.co>, mrisdon@acof.org <mrisdon@acof.org>, affordablehomestead@gmail.com <affordablehomestead@gmail.com>, Riaz@marrscorp.com <Riaz@marrscorp.com>, apreedge@cityventures.com <apreedge@cityventures.com>, Maryann.Ybarra@cvhc.org <Maryann.Ybarra@cvhc.org>, mdiacos@cyressequity.com <mdiacos@cyressequity.com>, lvandeweghe@decro.org <lvandeweghe@decro.org>, mpark@aguacaliente.net <mpark@aguacaliente.net>, smoreno@families-forward.org <smoreno@families-forward.org>, jon@hipsandiego.org <jon@hipsandiego.org>, paul@integrityhousing.org <paul@integrityhousing.org>, rubina@olivecs.org <rubina@olivecs.org>, cesarc@kennedycommission.org <cesarc@kennedycommission.org>, esantana@ush.us <esantana@ush.us>, ggardner@usapropfund.com <ggardner@usapropfund.com>, tmize@workforcehomebuilders.com <tmize@workforcehomebuilders.com>, jortiz@nphsinc.org <jortiz@nphsinc.org>, info@hfhcv.org <info@hfhcv.org>, cdahlin@cvag.org <cdahlin@cvag.org>, info@liffitorise.org <info@liffitorise.org>, geoff@cathedralcenter.org <geoff@cathedralcenter.org>, patti@angelview.org <patti@angelview.org>, srobinson@bgcccity.org <srobinson@bgcccity.org>, thomi@Trans.health <thomi@Trans.health>, rps51@me.com <rps51@me.com>, igarcia@ifhmb.com <igarcia@ifhmb.com>, JUGarcia@rivco.org <JUGarcia@rivco.org>, lcarlson@cvag.org <lcarlson@cvag.org>, kmckinney@cvm.org <kmckinney@cvm.org>, revcrawshaw@gmail.com <revcrawshaw@gmail.com>, aaron@thebridgecc.com <aaron@thebridgecc.com>, info@ngcclife.com <info@ngcclife.com>, psnaz.com@gmail.com <psnaz.com@gmail.com>, info@hosannacitychurch.org <info@hosannacitychurch.org>, stlouiscathedralcity@sbdiocese.org <stlouiscathedralcity@sbdiocese.org>, info@churchinthecove.org <info@churchinthecove.org>, tmize@nationalcore.org <tmize@nationalcore.org>, mirving@uhcllc.net <mirving@uhcllc.net>, JSilver@chochousing.org <JSilver@chochousing.org>, CLiuzzo@chochousing.org <CLiuzzo@chochousing.org>, YLyashenko@chochousing.org <YLyashenko@chochousing.org>, MHachiya@chochousing.org <MHachiya@chochousing.org>, Maryann.Ybarra@cvhc.org <Maryann.Ybarra@cvhc.org>, DarrenB@tpchousing.com <DarrenB@tpchousing.com>, CalvaryCC@aol.com <CalvaryCC@aol.com>, Leisa Lukes <lelu1299@icloud.com>, Robert Rodriguez <RRodriguez@cathedralcity.gov>, Tami Scott <tscott@cathedralcity.gov>, Nicole Criste <ncriste@terranovaplanning.com>, Kelly Clark <kclark@terranovaplanning.com>, VNicholas@chochousing.org <VNicholas@chochousing.org>, Julie.Bornstein@cvhc.org <Julie.Bornstein@cvhc.org>, executivedirector@hfhcv.org <executivedirector@hfhcv.org>

**Attachments:** image001.png



*• VIRTUAL • COMMUNITY  
WORKSHOP NOTICE*

# JOIN US ON ZOOM FOR THE CATHEDRAL CITY HOUSING COMMUNITY WORKSHOP!

Tuesday, January 12, 2021 - 4:00 p.m.

## WHAT IS IT?

A VIRTUAL community workshop for the City's Housing Element Update (2022-2029 planning period). At this workshop, the City will discuss background information regarding its upcoming Housing Element Update including new State Housing Element law, and the 2022-2029 Regional Housing Needs Assessment (RHNA) allocation for the City.

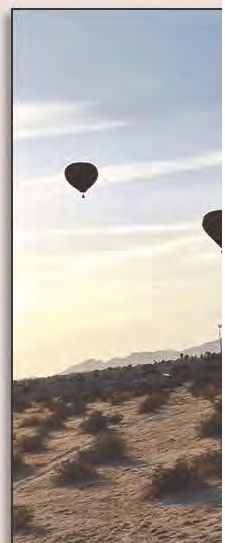
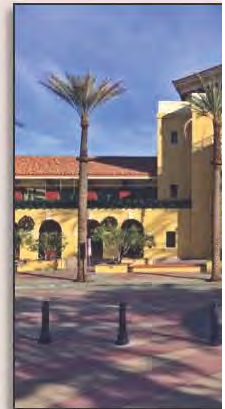
## WHY SHOULD I ATTEND?

One important purpose of the Community Meeting is to gather public comments on the Update from those attending. All members of the public are encouraged to attend and give us your input on the future of housing in your City!

The Housing Element is a series of goals, policies, and implementation measures for the preservation, improvement, and development of housing throughout the City. It will address how the City can help provide housing for all its residents at all income levels. Your input is invaluable in assisting our staff to set housing goals for current and future residents!

To participate in the workshop via Zoom, please RSVP by email to [kcuza@terranovaplanning.com](mailto:kcuza@terranovaplanning.com), by 10:00 a.m. on the day of the meeting, January 12<sup>th</sup> (requests received after 10:00 a.m. on meeting day may not be processed). Written comments or specific questions regarding the workshop or Housing Element may be directed to Robert Rodriguez, Director of Planning, at (760) 770-0344 or [rrodriguez@cathedralcity.gov](mailto:rrodriguez@cathedralcity.gov) or mailed to 68700 Avenida Lalo Guerrero, Cathedral City, CA 92234.

The City of Cathedral City promotes fair housing and makes all programs available to low-income families and individuals, regardless of race, religion, color, national origin, ancestry physical disability, mental disability, medical condition, marital status, political affiliation, sex, age, sexual orientation or other arbitrary factor.





Cathedral City

# ***·VIRTUAL· COMMUNITY WORKSHOP NOTICE***

***JOIN US ON ZOOM FOR THE CATHEDRAL CITY HOUSING ELEMENT  
COMMUNITY WORKSHOP!***

***Tuesday, January 12, 2021 - 4:00 p.m.***

***WHAT IS IT?***

*A VIRTUAL community workshop for the City's Housing Element Update (2022-2029 planning period). At this workshop, the City will discuss background information regarding its upcoming Housing Element Update including new State Housing Element law, and the 2022-2029 Regional Housing Needs Assessment (RHNA) allocation for the City.*

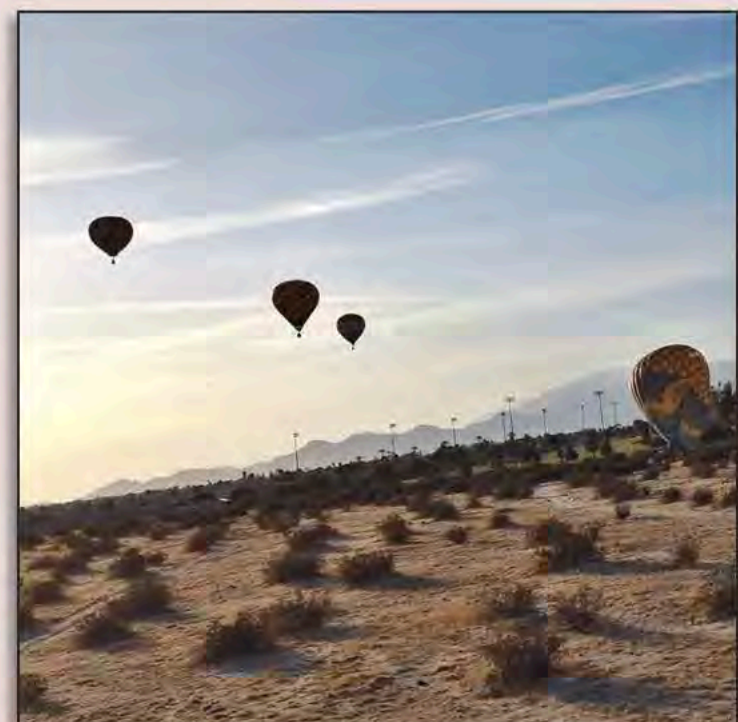
***WHY SHOULD I ATTEND?***

*One important purpose of the Community Meeting is to gather public comments on the Update from those attending. All members of the public are encouraged to attend and give us your input on the future of housing in your City!*

*The Housing Element is a series of goals, policies, and implementation measures for the preservation, improvement, and development of housing throughout the City. It will address how the City can help provide housing for all its residents at all income levels. Your input is invaluable in assisting our staff to set housing goals for current and future residents!*

*To participate in the workshop via Zoom, please RSVP by email to [kcuza@terranovalplanning.com](mailto:kcuza@terranovalplanning.com), by 10:00 a.m. on the day of the meeting, January 12<sup>th</sup> (requests received after 10:00 a.m. on meeting day may not be processed). Written comments or specific questions regarding the workshop or Housing Element may be directed to Robert Rodriguez, Director of Planning, at (760) 770-0344 or [rrodriguez@cathedralcity.gov](mailto:rrodriguez@cathedralcity.gov) or mailed to 68700 Avenida Lalo Guerrero, Cathedral City, CA 92234.*

*The City of Cathedral City promotes fair housing and makes all programs available to low-income families and individuals, regardless of race, religion, color, national origin, ancestry physical disability, mental disability, medical condition, marital status, political affiliation, sex, age, sexual orientation or other arbitrary factor.*



## News

# Public Encouraged to Provide Input on Cathedral City's Housing Element

**Post Date:** 01/05/2021

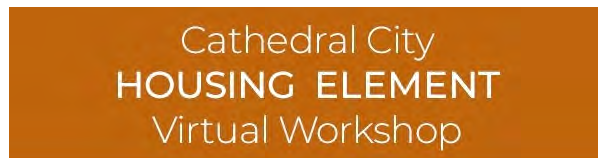
The public is encouraged to be part of a virtual community workshop for Cathedral City's Housing Element which will provide an update on the new State Housing Element law and the 2022-2029 Regional Housing Needs Assessment (RHNA) allocation for the city. The workshop will take place on Tuesday, January 12, 2021 starting at 4:00 pm.

The Housing Element is a series of goals, policies, and implementation measures for the preservation, improvement and development of housing throughout the

City. It will address how the City can help provide housing for all its residents at all income levels. Your input is requested in assisting staff to set housing goals for current and future residents.

To participate in the workshop via Zoom.us, please RSVP by email to [kcuzza@terranovaplanning.com](mailto:kcuzza@terranovaplanning.com) no later than Tuesday, January 12th at 10:00 am. You may also submit written comments or questions to Robert Rodriguez, Director of Planning, (760) 770-0344 or [rrodriguez@cathedralcity.gov](mailto:rrodriguez@cathedralcity.gov). You may also mail to his attention at City of Cathedral City, Attn: Robert Rodriguez, 68-700 Avenida Lalo Guerrero, Cathedral City, CA 92234.

[Download the Flyer](#)



**January 12, 2021, 4 pm**

[Return to full list >>](#)



Welcome to  
**CATHEDRAL CITY, CA**

**NEWS**

**New COVID-19 Testing Location in Cathedral City Starting Monday**

- Located at Northgate Church, 30010 Date Palm Drive
- Open 7:00 am to 7:00 pm, Monday through Friday
- Make appt at [www.lhi.care/COVIDTesting](http://www.lhi.care/COVIDTesting)
- Mayor Raymond Gregory to Get Tested Monday Morning



New COVID-19 Testing Location at Northgate Church in Cathedral City

Cathedral City  
**HOUSING ELEMENT**  
Virtual Workshop



Public Encouraged to Provide Input on Cathedral City's Housing Element

**CITYWIDE SPECIAL ELECTION**  
TUESDAY, MARCH 2, 2021



**SHORT-TERM VACATION RENTALS**

**MEASURE B**

Cathedral City Voters to Decide on STVRs – Measure B – March 2

participants\_89711856581(1)

Name (Original Name)	User Email	Join Time	Leave Time	Duration (Minutes)	Guest
Tom Patterson (thomas)		01/12/2021 03:07:52 PM	01/12/2021 05:12:45 PM	125	Yes
Robert Rodriguez		01/12/2021 03:30:19 PM	01/12/2021 03:30:42 PM	1	Yes
Terra Nova Planning & Research# Inc.	<a href="mailto:tnconfroom@gmail.com">tnconfroom@gmail.com</a>	01/12/2021 03:32:52 PM	01/12/2021 05:20:58 PM	109	No
Nicole Criste	<a href="mailto:ncriste@terranovaplanning.com">ncriste@terranovaplanning.com</a>	01/12/2021 03:52:25 PM	01/12/2021 05:20:58 PM	89	No
Alejandra Garcia		01/12/2021 03:53:19 PM	01/12/2021 04:45:38 PM	53	Yes
Mark Carnevale		01/12/2021 03:53:30 PM	01/12/2021 03:55:09 PM	2	Yes
John Kirby	<a href="mailto:crestlinewriter@gmail.com">crestlinewriter@gmail.com</a>	01/12/2021 03:54:52 PM	01/12/2021 05:08:29 PM	74	Yes
Mark Carnevale		01/12/2021 03:55:19 PM	01/12/2021 05:20:53 PM	86	Yes
Gretchen Gutierrez		01/12/2021 03:55:59 PM	01/12/2021 05:20:57 PM	85	Yes
Dan Malcolm		01/12/2021 03:56:48 PM	01/12/2021 05:20:55 PM	85	Yes
Nancy Ross		01/12/2021 03:58:18 PM	01/12/2021 05:20:56 PM	83	Yes
Raymond Gregory	<a href="mailto:message4raymond@verizon.net">message4raymond@verizon.net</a>	01/12/2021 03:58:33 PM	01/12/2021 03:59:28 PM	1	Yes
darrellthomas		01/12/2021 03:58:34 PM	01/12/2021 05:20:58 PM	83	Yes
Davethornton		01/12/2021 03:59:18 PM	01/12/2021 05:20:58 PM	82	Yes
Robert Rodriguez - City (Robert Rodriguez)		01/12/2021 03:59:32 PM	01/12/2021 05:20:58 PM	82	Yes
iPad (3)		01/12/2021 03:59:55 PM	01/12/2021 05:20:58 PM	82	Yes
Pattie		01/12/2021 04:01:07 PM	01/12/2021 05:00:00 PM	59	Yes
Raymond Gregory	<a href="mailto:rgregory@cathedralcity.gov">rgregory@cathedralcity.gov</a>	01/12/2021 04:01:22 PM	01/12/2021 04:02:10 PM	1	Yes
tscott		01/12/2021 04:01:25 PM	01/12/2021 05:20:57 PM	80	Yes
<a href="mailto:geoff@cathedralcenter.org">geoff@cathedralcenter.org</a>	<a href="mailto:geoff@cathedralcenter.org">geoff@cathedralcenter.org</a>	01/12/2021 04:01:31 PM	01/12/2021 04:01:31 PM	0	Yes
Ernesto Gutierrez		01/12/2021 04:02:19 PM	01/12/2021 04:04:20 PM	3	Yes
Raymond Gregory	<a href="mailto:rgregory@cathedralcity.gov">rgregory@cathedralcity.gov</a>	01/12/2021 04:02:28 PM	01/12/2021 04:12:17 PM	10	Yes
Maryann		01/12/2021 04:02:30 PM	01/12/2021 05:20:55 PM	79	Yes
<a href="mailto:geoff@cathedralcenter.org">geoff@cathedralcenter.org</a>	<a href="mailto:geoff@cathedralcenter.org">geoff@cathedralcenter.org</a>	01/12/2021 04:03:13 PM	01/12/2021 05:20:58 PM	78	Yes
Ernesto Gutierrez	<a href="mailto:miragefin@aol.com">miragefin@aol.com</a>	01/12/2021 04:04:42 PM	01/12/2021 04:22:53 PM	19	Yes
mario		01/12/2021 04:11:44 PM	01/12/2021 05:20:29 PM	69	Yes
Waddle		01/12/2021 04:11:45 PM	01/12/2021 05:20:58 PM	70	Yes
Raymond Gregory	<a href="mailto:rgregory@cathedralcity.gov">rgregory@cathedralcity.gov</a>	01/12/2021 04:12:17 PM	01/12/2021 05:21:45 PM	70	Yes
Tony Mize	<a href="mailto:tmize@nationalcore.org">tmize@nationalcore.org</a>	01/12/2021 04:14:46 PM	01/12/2021 05:20:58 PM	67	Yes
Ernesto Gutierrez	<a href="mailto:miragefin@aol.com">miragefin@aol.com</a>	01/12/2021 04:23:10 PM	01/12/2021 05:20:57 PM	58	Yes
Joy Silver (Joy Silver)	<a href="mailto:joy@joysilverforcalifornia.com">joy@joysilverforcalifornia.com</a>	01/12/2021 04:24:05 PM	01/12/2021 05:20:57 PM	57	Yes
Keith Davis MedSocialWork	<a href="mailto:kdavis@healthyliving-pd.com">kdavis@healthyliving-pd.com</a>	01/12/2021 04:26:08 PM	01/12/2021 04:26:55 PM	1	Yes
Nicole Criste	<a href="mailto:ncriste@terranovaplanning.com">ncriste@terranovaplanning.com</a>	01/12/2021 03:36:31 PM	01/12/2021 03:43:20 PM	7	No



# HOUSING ELEMENT UPDATE COMMUNITY WORKSHOP

January 12, 2021

- The City must update the General Plan's Housing Element every 8 years.
- The Housing Element helps to guide the City's housing development for all residents, with a focus on housing for lower income residents.
- The City must make sure that it does not create obstacles for the development of affordable housing units that meet residents' needs.



# Background

- The City has 54,357 residents living in 18,816 households.
- Although the population is getting older, the City's median age is lower than many Valley cities at 39.4 years.
- The median household income is \$46,521, which is lower than the County's (\$65,712)
- Nearly half of residents work – 23,119
  - Most work in service, management, sales and offices



Cathedral City

# Background

- 11,429 of the City's households own their home.
- 7,387 households rent their home.
- The median housing value in the City is \$279,500.
- The median rent is \$1,193.



Cathedral City

# Background

- 70% of very low and low income homeowners pay more than 30% of their income for housing (3,105 households).
- 75% of very low and low income renters pay more than 30% of their income for housing (3,645 households).
- There are 1,663 overcrowded units in the City (more than one person per room).
- The City has 2,805 large households (5 or more)



# Housing Needs

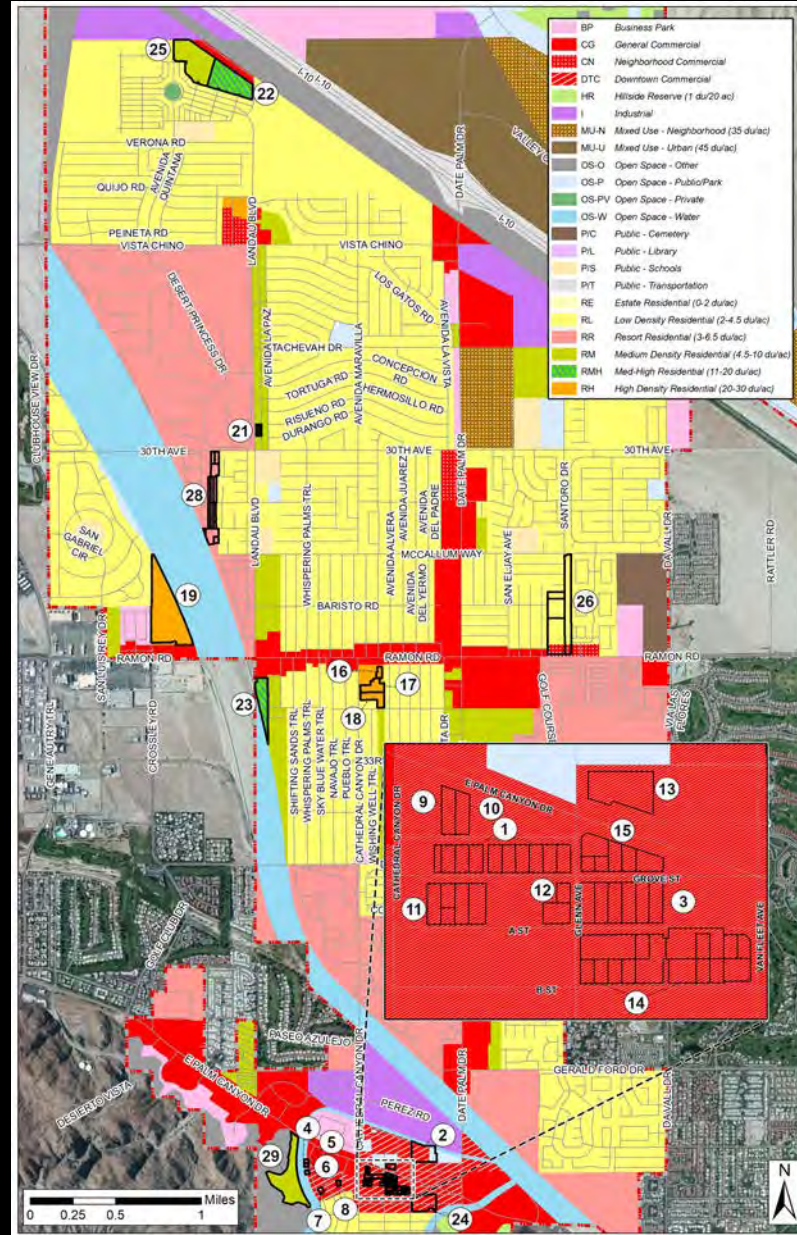
RHNA by Income Category, 2022-2029	
Income Category	No. of Units
Extremely Low Income <sup>1</sup>	269
Very Low Income (<50% of AMI)	269
Low Income (50-80% of AMI)	352
Moderate Income (81-120% of AMI)	456
Above Moderate Income (> 120% of AMI)	1,196
<b>Total Units</b>	<b>2,542</b>

<sup>1</sup> Extremely Low Income (ELI) category is a subset of the Very Low Income category. ELI households are defined by HCD as those with incomes less than 30% of AMI. The number of units needed is assumed to be 50% of all Very Low-Income units.  
Source: SCAG 2020



# Housing Sites

- Identified sites for 1,097 very low and low income units and 496 moderate income units.
- Distributed throughout the City.
  - Downtown area near jobs and transit
  - Integrated into existing neighborhoods.



Cathedral City

# Questions and Comments

- Does housing in the City meet residents' needs now?
- What concerns do you have about housing in the City?
- What do you think are the greatest needs for housing in the City?
- How do you think the City should help with providing housing for the next 8 years?



Cathedral City

---

**From:** Robert Rodriguez <[RRodriguez@cathedralcity.gov](mailto:RRodriguez@cathedralcity.gov)>  
**Date:** Wednesday, October 13, 2021 at 2:54 PM  
**To:** Kelly Clark <[kclark@terranovaplanning.com](mailto:kclark@terranovaplanning.com)>  
**Cc:** Nicole Criste <[ncriste@terranovaplanning.com](mailto:ncriste@terranovaplanning.com)>, Leisa Lukes <[lelu1299@icloud.com](mailto:lelu1299@icloud.com)>, Tami Scott <[TScott@cathedralcity.gov](mailto:TScott@cathedralcity.gov)>  
**Subject:** CC Housing Element Comments

Kelly,

We received our first comments.

**From:** Shelley Kaplan [shelleykaplan2020@gmail.com](mailto:shelleykaplan2020@gmail.com)  
**Sent:** Tuesday, October 12, 2021 1:43 PM  
**To:** Shelley Kaplan [shelleykaplan2020@gmail.com](mailto:shelleykaplan2020@gmail.com); Robert Rodriguez [RRodriguez@cathedralcity.gov](mailto:RRodriguez@cathedralcity.gov)  
**Cc:** Christopher Parman [CParman@cathedralcity.gov](mailto:CParman@cathedralcity.gov); Charles McClendon [CMcClendon@cathedralcity.gov](mailto:CMcClendon@cathedralcity.gov); Raymond Gregory [RGregory@cathedralcity.gov](mailto:RGregory@cathedralcity.gov)  
**Subject:** Re: [New post] Public Encourage to Provide Input on Cathedral City's Housing Element

A few comments on the Housing plan.

Given the past year the housing values still seem low. You did provide updated rental costs for 2020 so it would be helpful to show updated housing costs as well. I would suggest at the the housing cost section or on page 81 that you include the average price of home sales with unit counts for the past 12 months. As a result on III-19 the paragraph talking about affordable housing guidelines is misleading given the updated 2020 rental cost figures and perhaps that should be noted. On III-80 the land cost says \$100k per room - I think that might be per housing unit. Finally a small typo on III-2 section 65581 (b) an extra "prepare".

Lots of great information provided in the updated plan. Congratulations.

Shelley



**Cathedral City**

**Robert Rodriguez**

Director of Planning/Building

City of Cathedral City

68700 Avenida Lalo Guerrero

Cathedral City, Ca 92234

Tel: (760)770-0344

Fax: (760)202-1460

website: [www.cathedralcity.gov](http://www.cathedralcity.gov)

e-mail: [rrodriguez@cathedralcity.gov](mailto:rrodriguez@cathedralcity.gov)

**Appendix D**  
**2016 Assessment of Fair Housing Report**

## Review Submission

Review the content of your AFH before completing the certification and submission to HUD.

Cover	
Assessment Id	50
Assessment Title	Cathedral City AFH
Sole or Lead Submitter Contact Information	
<hr/>	
Name	Vincent Lopez
Title	Sole Submitter
Department	Engineering Division
Street Address	68700 Avenida Lalo Guerrero
Street Address 2	
City	Cathedral City
State	California
Zip Code	92234

Program Participants			
Participant Id	Name	Lead?	Submission Due Date
953674780	Cathedral City, California	Yes	10/04/2016

Executive Summary
<p><b>i</b> Instructions</p> <div style="border: 1px solid gray; padding: 10px; margin-top: 10px;"> <p>II.1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.</p> </div>

The Fair Housing Act of 1968 prohibits housing discrimination based on race, color, religion, sex, familial status, national origin, or disability. On July 8, 2015, HUD released “Affirmatively Further Fair Housing Choice” which is a final rule requiring jurisdictions and public housing agencies (PHAs) receiving federal funds to (1) affirmatively further fair housing, (2) take steps to actively overcome historic patterns of segregation and (3) promote fair housing choice.

The purpose of this Assessment of Fair Housing is to provide HUD program participants “with an effective planning approach to aid them in taking meaningful actions to overcome “fair housing issues” such as historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.” A “fair housing issue” is defined as “a condition that restricts choice or access to opportunity, including:

- Ongoing local or regional segregation, or lack of integration.
- Racial or ethnic concentrations of poverty.
- Significant disparities in access to opportunity.
- Disproportionate housing needs based on the “protected classes” of race, color, national origin, religion, sex, familial status, or disability.
- Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.

The Act also requires jurisdictions and public housing agencies (PHAs) receiving federal funds for housing and urban development to affirmatively further fair housing, to take steps to actively overcome historic patterns of segregation and to promote fair housing choice.

The City values citizen input on how well city government serves its residents. The public participation effort for the 2016 Assessment of Fair Housing (AFH) adheres to the City’s adopted Citizen Participation Plan. To solicit public feedback on fair housing choice in the City of Cathedral City and in consideration of possible issues.

Information was gathered from many different sources, including:

- Communication with people seeking fair housing
- Comments and information from public meetings and public forums—including a focus group made up of affordable housing advocates and social service providers.
- Neighborhood surveys—including comments from citizens in many parts of the city about types of housing they have and any issues they have encountered.
- Review of Home Mortgage Disclosure Act data—Compilation and analysis of Home Mortgage Disclosure Act data from the Federal Financial Institutions Examination Council.
- Review of public documents—the following are examples of data sources used to complete this AFH.

Based on the public participation and data gathering process stated above, the City established the following Goals to address issues found through the AFH process:

- Increase levels of integration by Hispanic residents within higher opportunity neighborhoods.
- Improve the community and housing conditions of the Downtown and Dream Home Area
- Reduce the number of fair housing complaints based on disability.

## Community Participation Process

### Instructions

III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

### Instructions

This Assessment of Fair Housing Report has been developed to provide an overview of laws, regulations, conditions or other possible obstacles that could affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals and service providers. To assure that the report responds to community needs, the development of the AI includes a community outreach program consisting of public review, a resident survey, service provider interviews, and a public hearing.

The City values citizen input on how well city government serves its residents. The public participation effort for the 2016 Assessment of Fair Housing (AFH) adheres to the City's adopted Citizen Participation Plan. To solicit public feedback on fair housing choice in the City of Cathedral City and in consideration of possible issues.

### **Community Meetings**

Cathedral City residents and public and private agencies either directly or indirectly involved with fair housing issues in Cathedral City were invited to participate in two community advisory committee meetings on the following dates and below location:

· June 30, 2016 (South City)

Cathedral City Public Library

33520 Date Palm Drive

Cathedral City, California 92234

· July 11th, 2016 (Dream Homes) 6:00pm

Boys and Girls Club of Cathedral City

32141 Whispering Palms Trail

Cathedral City, CA 92234

The meetings provided the opportunity for the Cathedral City community to gain awareness of fair housing laws and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and e-mail, if available, to agencies and organizations that serve the low- and moderate-income and special needs community.

Meeting times and dates were placed in Cathedral City's newspaper in both English and Spanish and posted conspicuously at City Hall and the Cathedral City branch of the County Library. The City also used social media platforms such as Facebook, to ensure the broadest possible community communication. Lastly, we targeted the neighborhoods of *Dream Home* and *South City* to host two community meetings, which are located within the City's Low-Moderate Census tracts. We also employed the assistance of City Council Members to encourage residents to attend the meetings. Hosting community meetings in these areas were important to the City's objective of encouraging participation from populations that are typically underrepresented in the planning process. Due to extensive outreach efforts, attendance at the public meetings included several service providers and citizen groups that work with residents considered a protected class according to HUD's definition. These community members and service providers supplied first-hand insight into fair housing issues and concerns.

### **Focus Group**

In addition, a focus group was held to discuss the development of the AFH. The purpose of the focus group was to provide fair housing advocates and providers within the community a forum to express their views on the fair housing needs of special needs groups and the community at large. The focus group was held at the following location:

July 7, 2016 @ 4:00pm

Cathedral City Civic Center

Study Session Room, First Floor

68700 Avenida Lalo Guerrero

Cathedral City, CA 92234

Although the invite was open to all interested community stakeholders, the following organizations were invited to contribute to the focus group:

- Boys and Girls Club of Cathedral City
- Angel View (serving children and adults with disabilities) **(attended)**
- Roy's Desert Resource Center (homeless)
- Inland Fair Housing and Mediation Board **(attended)**
- The Cathedral Center (senior center)
- Engineering staff **(attended)**
- Planning staff **(attended)**
- Building/Code Compliance staff **(attended)**
- Housing staff **(attended)**
- Riverside County Continuum of Care **(attended)**
- Path of Life Ministries **(attended)**
- Jewish Family Services of San Diego **(attended)**

### Resident Survey

To supplement the citizen advisory meetings, a survey was made available to Cathedral City residents at City Hall, Cathedral City public library, and Cathedral City Senior Center. The survey was also available online at the City's website, via a dedicated address. Spanish versions of the survey were provided to reflect the diversity of Cathedral City's residents. During the eight-week survey period, completed surveys were submitted by 63 Cathedral City residents.

The purpose of this survey is to give residents an opportunity for involvement in the development of the City's fair housing assessment and planning process. The following are specific questions asked to participants (results will be detailed later in the AFH):

1. Have you ever encountered any forms of housing discrimination or known someone who has?

? ? ?

Yes No Not Sure

2. If you believe or think that you or someone you know encountered housing discrimination, what type was it?
  - o Refusing, discouraging, or charging more to rent an apartment or buy a home.
  - o Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood.

- Refusing, discouraging, making it difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home.
- Refusing, discouraging or charging more for home insurance.
- Refusing to make a reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability.
- Predatory lending: unfair, misleading and deceptive loan practices.

? Other \_\_\_\_\_

\_\_\_\_\_

3. Do you feel that you are well-informed on Housing Discrimination?

- Yes
- No
- Somewhat
- Not enough

4. What would you do if you encountered Housing Discrimination?

- Ignore it
- Report it
- Don't Know

5. If you were to report Housing Discrimination, who would you report it to?

- Cathedral City
- Don't Know
- Other \_\_\_\_\_

6. What types of discrimination do you think occur most frequently in the City of Cathedral City?

7. What can be done to prevent housing discrimination in Cathedral City?

8. Please choose the best response that describes your interest in completing this survey?

- As a resident
- As a business owner/operator
- As a nonprofit organization

9. Please indicate if you are a resident of one of the communities listed below:

- South City Area
- Dream Home Area
- Cove Area
- Panorama Area

For residents of these neighborhoods, what are the major fair housing issues within these areas?

### **Service Provider Interviews**

To gain further analysis relating to fair housing issues within the City, individual interviews were conducted. The interviews gave in-depth context and insight into housing conditions and fair housing issues for residents in Cathedral City. The following are service providers participating in the individual interviews:

- Inland Fair Housing and Mediation Board
- Cathedral Building/Code Compliance
- Path of Life Ministries
- Jewish Family Services of San Diego
- Housing Authority of the County Riverside
- Riverside County Continuum of Care

### **Public Review**

The 'Draft AFH' was available to the public for thirty (30) days beginning August 15, 2016 through September 13, 2016. Residents was able to view a copy of the report on the City's website ([www.cathedralcity.gov](http://www.cathedralcity.gov)) or at:

Cathedral City Civic Center  
68700 Avenida Lalo Guerrero  
Cathedral City, CA 92234

Cathedral Center  
37171 W. Buddy Rogers Ave.  
Cathedral City, CA 92234

Boys and Girls Club of Cathedral City

32141 Whispering Palms Trail


Cathedral City, CA 92234

Cathedral City Branch Library

33520 Date Palm Drive

Cathedral City, CA 92234

III.2. Provide a list of organizations consulted during the community participation process.

 Instructions

In the development of the AFH, the City consulted with public and private departments; social service agencies; and other non-profit organizations to review potential issues to fair housing choice in the public and private sector. The City met with several representatives to provide information about the AFH and its process. A total of fifty-six agencies servicing Cathedral City and greater Riverside County were invited to participate in the process:

Campeños Unidos 1(800) 371-1005	Office on Aging (a.k.a. Access) 800-510-2020
Cathedral City Code Compliance (760) 770-8200	Red Cross External Link Icon (760) 773-9105
Cathedral City Senior Center (760) 321-1548	Rescue Mission Indio (760) 347-3512
Catholic Charities, Cathedral City (760) 202-1222	Riverside County Health Dept. Palm Springs (760) 778-2235
Riverside County Children Services (760) 342-3503	Salvation Army (760) 324-2275

Department of Public Social Services (DPSS) (760) 770-2300	Shelter From the Storm (760) 328-7233
Inland Fair Housing and Mediation Board (IFHMB) (800) 321-0911	Housing Authority (760) 863-2828
Jewish Family Services, Palm Springs (760) 325-4088	Inland Counties Legal Services, Indio (760) 342-1591
Martha's Kitchen 83-791 Date Avenue Indio, California 92201 (760) 347-4741	AGUA CALIENTE BAND OF CAHUIILLA INDIANS ATTN: Margaret Park 5401 Dinah Shore Drive Palm Springs, CA 92263
BURRTEC Waste & Recycling Services 41575 Eclectic Palm Desert, CA 92260	CALIFORNIA DEPARTMENT OF FISH & GAME 3602 Inland Empire Blvd. C-220 Ontario, CA 91764-4913
California Dept of Transp.-District 8 Planning ATTN: Daniel Kopulsky IGR/Local Development Review 464 West 4th St., 6th Floor, MS 722 San Bernardino, CA 92401-1400	CITY OF RANCHO MIRAGE Community Development Director 69825 Hwy. 111 Rancho Mirage, CA 92270
CITY OF PALM SPRINGS Planning Department 3200 E. Tahquitz Canyon Way Palm Springs, CA 92262	COACHELLA VALLEY WATER DISTRICT Development Services Dept. P.O. Box 1058 Coachella, CA 92236
COUNTY CLERK County of Riverside P.O. Box 751 Riverside, CA 92502-0751	DESERT WATER AGENCY Operations Engineer P.O. Box 1710 Palm Springs, CA 92263-1710

Native American Heritage Commission ATTN: Katy Sanchez 915 Capitol Mall, Room 364 Sacramento, CA 95814-4801	U.S. POSTAL SERVICE Postmaster 33490 Date Palm Drive Cathedral City, CA 92234-9998
RIVERSIDE COUNTY FLOOD CONTROL DISTRICT 1995 Market Street Riverside, CA 92501-1719	RIVERSIDE COUNTY Transportation Department ATTN: John Armas P.O. Box 1090 Riverside, CA 92502-3609
SOUTHERN CALIFORNIA EDISON Director of Planning 36100 Cathedral Canyon Drive Cathedral City, CA 92234	THE GAS COMPANY Field Planning Associate 211 N. Sunrise Way Palm Springs, CA 92262
TIME WARNER CABLE ATTN: Lynnda Johnson 83-473 Avenue 45 Indio, CA 92201	US Dept. of the Interior/ Bureau of Indian Affairs P.O. Box 2245 Palm Springs, CA 92262
VERIZON Section Manager, Network Operations 295 N. Sunrise Way Palm Springs, CA 92262	Riverside County Airport Land Use Commission ATTN: John Guerin 4080 Lemon St., 14th Floor Riverside, CA 92501
Bureau of Land Management Palm Springs South Coast Field Office 1201 Bird Center Drive Palm Springs, CA 92262	Soboba Band of Luiseno Indians ATTN: Joseph Ontiveros, Cultural Resources Manager PO Box 487 San Jacinto, CA 92581 Email: jontiveros @ soboba-nsn.gov

California Regional Water Quality Control Board 73-720 Fred Waring Dr., Ste 100 Palm Desert, CA 92260-7002	CITY OF DESERT HOT SPRINGS Planning Department 65950 Pierson Blvd. Desert Hot Springs, CA 92240-3044
COACHELLA VALLEY MOUNTAINS CONSERVANCY 73-710 Fred Waring Dr., Suite 205 Palm Desert, CA 92260	PALM SPRINGS UNIFIED SCHOOL DIST. Director of Facility Planning Development 980 E. Tahquitz Canyon Way #202 Palm Springs, CA 92262-6708
Riverside County Public Health Dept. P.O. Box 7600 Riverside, CA 92513-7600	Dept. of the Army Corps of Engineers P.O. Box 532711 Los Angeles, CA 90053
US DEPARTMENT OF THE INTERIOR Fish and Wildlife Service 6010 Hidden Valley Road Carlsbad, CA 92011-4213	SUNLINE TRANSIT 32505 Harry Oliver Trail Thousand Palms, CA 92276
Palm Springs Cemetery District ATTN; Kathleen Juraski 31-705 Da Vall Drive Cathedral City, CA 92234	AGUA CALIENTE TRIBAL ADMINISTRATION PLAZA ATTN: Patty Garcia 5401 Dinah Shore Drive Palm Springs, CA 92264
Boy's & Girl's Club of Cadral City Children's Organization 32141 Whispering Palms Trl, Cathedral City, CA (760) 324-5844?	Dorian J. Cooley Deputy Chief - Operations Eastern Operational Area CALFIRE/Riverside County Fire 77-933 Las Montañas Rd., Suite 205 Palm Desert, CA 92211 Office (760) 393-3450 Fax (760) 863-7445

Angel View (serving children and adults with disabilities) 73468 Highway 111 Palm Desert, CA · (760) 776-9620	Roys Desert Resource Center (homeless) 19531 McLane Street Palm Springs, CA 92262 (760) 676-5200
Jewish Family Services of San Diego 8804 Balboa Avenue San Diego, CA 92123	Cathedral City (Planning, Housing Building/Code Compliance) 68700 Avenida Lalo Guerrero Cathedral City, CA 92234
Riverside County Continuum of Care 4060 County Circle Dr. Riverside, CA 92503	Path of Life Ministries 2530 Third St Riverside, CA 92507

III.3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

 Instructions

The City was very successful in eliciting meaningful community participation. Many of the comments have been used in formulating goals. Examples of this are the Inland Fair Housing and Mediation Boards recommendation to create programs to respond to issues relating to accessibility for individuals with disabilities; as well as citizens from the Dream Home Area who empathetically stated their displeasure with the lack of resources dedicated to the Dream Home area. Finally, a total of 63 surveys were provided by Cathedral City citizens which also provided meaningful community participation.

III.4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

 Instructions

### Resident Survey

To supplement the citizen advisory meetings, a survey was made available to Cathedral City residents at City Hall, Cathedral City public library, and Cathedral City Senior Center. The survey was also available online at the City's website, via a dedicated address. Spanish versions of the survey were provided to reflect the diversity of Cathedral City's residents. Four community activist from the Dream Home Area

volunteered to go door to door to insure maximum participation by residents. During the eight-week survey period, completed surveys were submitted by 62 Cathedral City residents.

The purpose of this survey is to give residents an opportunity for involvement in the development of the City's fair housing assessment and planning process. The following are specific questions asked to participants and results:

**Have you ever encountered any forms of housing discrimination or known someone who has?**

Yes	26.67%
No	68.33%
Not Sure	67%

**If you believe or think that you or someone you know encountered housing discrimination, what type was it?**

- Refusing, discouraging, or charging more to rent an apartment or buy a home. 50.00%
- Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood. 16.67%
- Refusing, discouraging, making it difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home 5.56%
- Refusing, discouraging or charging more for home insurance. 0.00%
- Refusing to make a reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability 16.67%

**If you believe or think that you or someone you know encountered housing discrimination, what type was it? (continued)**

- Predatory lending: unfair, misleading and deceptive loan practices. 11.11%
- Other 33.33%
  - Ø My aunt couldn't get section 8 because, as the lady told her, she is the wrong color.
  - Ø Made an offer on a home in the Cove and realtor did not submit it to owner. Happened more than once.
  - Ø Families with children
  - Ø Asking details about family such as age and sex of my 4year old daughter before we were allowed to receive ANY information about the rental.

- Racial discrimination
- A friend refused an apartment because of his sexual orientation.
- Senior mobile home rental park not disclosing debt to income ratios when vetting applicants

**Do you feel that you are well-informed on the issue of Housing Discrimination?**

Yes	43.33%
No	1.67%
Somewhat	51.67%
Not enough	5.00%

**What would you do if you encountered Housing Discrimination?**

Ignore it	5.00%
Report it	83.33%
Don't Know	13.33%

**If you were to report Housing Discrimination, who would you report it to?**

City of Cathedral City	69.49%
Don't Know	22.03%
Other	22.03%

**If you think that Housing Discrimination is occurring, what types of discrimination do you think occur most frequently in the City of Cathedral City?**

- Rentals, apts, condos, mobile home parks, etc., asking for 3-4 times income for their rental. Exp: Rental is \$900 mth, to qualify you need \$2700 income a month, even though you can afford the \$900 monthly rent.
- This is hypothetical since I answered that I have not encountered discrimination personally and that I do not know of anyone who has, it would be difficult to guess. I suppose discrimination of all types have happened, but I'm not sure which types are most frequent here. If we take just one type of discrimination, racial discrimination, then perhaps since the city's population is over 50% Hispanic, one might jump to the conclusion that there is a discrimination problem against other races and that the Hispanics are discriminating against others. But that may not be the case at all. It could be that they generate more children who in turn grow up and choose to live here. Or it could be that the economy is such that they choose to live here. Or it could be that they enjoy being with one another and do not wish to leave their loved ones. It does not matter if the reason is any of these reasons. There is nothing wrong with having a reason for living where you like. But if the reason they are living here is due to housing discrimination against them, perhaps it is the

other communities that are discriminating negatively and that is why they choose to reside in Cathedral City. I believe that a lot of people like to live in Cathedral City because they are able to find accommodations at a price that is right for them. And that's great! That's why I came to Cathedral City too.

- Against kids, blacks, or Hispanics
- Rejected because LGBTQ issues.

**If you think that Housing Discrimination is occurring, what types of discrimination do you think occur most frequently in the City of Cathedral City? (continued)**

- Realtors being selective for their sellers on who they prefer living in specific areas of the city.
- Affordability of housing, to me that's a form of discrimination. Especially for seniors.
- Racially restrictive discrimination
- I have heard people talk about low income housing in unfavorable terms.
- Home loan and predatory lending
- Many Hispanics live in homes where there are roads which are very poorly maintained. They are concentrated in specific areas. Many "Anglos" live in gated communities.
- They make rent too high for anyone to afford, leaving us stuck in the ghetto. We can't live in a nice area when you aren't afraid to go to your car at night because they only rent to high income families I suppose.
- Handicap accessibility to club house and pools

**What can be done to prevent housing discrimination in the City of Cathedral City?**

- Make a law that if the person can afford a rental, has good credit and no evictions, and good rental references they can't be discriminated against because they don't have 3-4 times the monthly rental to qualify.
- How much housing discrimination is there in Cathedral City? If it is a problem and it is not being addressed, then it is up to the City to do what they are supposed to do about it, or to guide the person to the right authorities when they come to the City for help. There has been constant PSAs on the radio and TV for many, many years, so everyone knows; unless they have just newly arrived from PodunkSomewheresville. If there is that much housing discrimination, my suggestion is to give to the new arrivals of Cathedral City a flyer of the law. To continue on this subject, I see no reason to add to the law we already have on housing discrimination. It is already comprehensive. The new enhanced law has shades of social engineering which will only agitate people more than they might be now. Encouragement to share and be friendly with all types is fine. Trying to balance everything is unnatural and makes people unhappy when it is pushed. Once a community has it's quota of racial diversity of certain race, another of that race will not be allowed to live there. If there are not enough LGBTs in the city naturally, there will be regulations or incentives in the policy guide to import more. If there is not a diverse mix of religious belief systems, they will be incentivized to import more, or on the other hand, perhaps, all will be squelched to prevent any from being a major influence on the City's population. If there are poor areas of the City, policy or incentives given to landlords to take people who can not afford their apartments and condos will even out the economic mix of the area and contrary-wise, developers will be required to build in areas not to their liking so that there will be a good mix of poor to wealthy in the same area. What happens next, in most cases, the wealthy take a loss when selling their home. This brings the

incomes of the City closer together and more "balanced" but it is not good for the person who lost money on his home and the City actually becomes poorer. I am opposed to enhancing the Housing Discrimination laws. The one we have now is fine and not too intrusive. With it, those who feel they have been discriminated against are provided recourse; they can go to court, win an award, and have the case settled.

- Allow abandoned houses to be used by homeless/low income.
- Realtors must post a contact number for prospective buyers on for sale ads if they experience bias or discrimination.
- Build more affordable housing, especially for seniors.
- Encourage mixed use housing.
- Good maintenance of the public roads etc. in the areas where most Hispanics live so that they are attractive to everyone and not be so evident that this is a working people habitat and the city does not maintain its public roads, sidewalks etc.
- Take ownership from those committing the heinous act of discrimination. Possibly a spanking too. The problem is that scummy people own the properties and do not care about rules and regulations.

**Please choose the best response that describes your interest in completing this survey**

- as a resident 96.61%
- as a business owner/operator 3.39%
- as a nonprofit 0.00%

**Please indicate if you are a resident of one of the communities listed below.**

- South City Area 16.67%
- Dream Home Area 0.00%
- Cove Area 36.67%
- Panorama Area 46.67%

**For residents of these neighborhoods, what are the major fair housing issues within these areas?**

- I am unaware of any problems in this area. We have a diverse mix of people on my street. Sorry I could not be of much help. But then perhaps this is helpful.
- Realtor did not maintain the property during escrow, plants were dug up on property outside of property was vandalized and when escrow finally closed realtor placed key under mat and walk through never happened. Seller left a mess in the house and realtor never gave me rebate for cleaning property
- I don't know because it seems like there is a pretty good cross section of various groups, young, old, LBSG, straight, families, high income homes and low income homes. From my perspective it seems like it is a good mix.
- Individuals refusing to sell to anyone other than a straight married couple.

- I live in Desert Palm and though the a City sent in compliance officers for liquor permit, they do not protect us from rent gauging as we are on Tribal Land when owned by a corporation headquartered in Chicago. We need a voice, we need our government.
- Vacation Rentals taking houses off of the full time rental market

Community Meeting	Comments
June 30, 2016 (South City) 5:30pm	No Attendance
Cathedral City Public Library	
33520 Date Palm Drive	
Cathedral City, California 92234	

Community Meeting	Comments
July 11th, 2016 (Dream Homes) 6:00pm	Dream Home Area is ignored by the City.
Boys and Girls Club of Cathedral City	Several homes in the area have been abandoned and being inhabited by homeless individuals
32141 Whispering Palms Trail	Additional resources should be directed towards the Dream Home area to curb the gang violence
Cathedral City, CA 92234	Additional surveys should be distributed through the area

Focus Group Comments	Comments (summary)
	Research has shown that Discrimination against individuals with a disability is the City's biggest concern
	Home Owner Associations tend to violate fair housing laws due to lack of education.
	Homeless families are in need of additional housing and services

#### Assessment of Past Goals, Actions and Strategies

IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

IV.1.a. Discuss what progress has been made toward their achievement.

#### Instructions

Action 1: Contract with the Fair Housing Council of Riverside County for the provision of landlord-tenant services including counseling, investigation, mediation and referrals. Cathedral City will contract with the Fair Housing Council beginning July 1, 2012 and through the term of the initial Five Year Consolidated Plan.

**PROGRESS:** Cathedral City began its Consolidated Plan acquiring the service of the Fair Housing Council of Riverside County to provide such services. However, in 2013 the City decided to move in a different direction and contracted Inland Fair Housing and Mediation Board (IFHMB) to provide landlord-tenant services including counseling, investigation, mediation and referrals. IFHMB also provides the City with fair housing reports that identify barriers within the City.

Action 2: The Fair Housing Council will provide community outreach services to renters and property owners distributing information, answering, conducting workshops regarding fair housing rights and responsibilities. The Fair Housing Council will have provided services for Cathedral City while it was a participating jurisdiction under the County CDBG Program and has continued to contract with the City of Cathedral City upon becoming an entitlement jurisdiction.

**PROGRESS:** Inland Fair Housing and Mediation Board is contracted to disseminate fair housing information throughout the City. Under contract, this agency also conducts two annual fair housing workshops tailored to some of the topics and issues currently going on in the City. Inland Fair Housing has constant contact with Cathedral City and provides valuable input in the preparation of multiple CDBG reports.

Impediment 2: Disabled Access

A greater number of calls came from the persons with disabilities over a three-year period. Typically, complaints' regarding disabled access indicates a shortage of accessible units and a lack of understanding of the issue of reasonable accommodation. Access for persons with disabilities is significant because of the large senior population in the City. As the population increases and the baby boom population ages the need to disabled accessibility increases.

Recommendation:

Action 3: Contract with the Fair Housing Council of Riverside County for the provisions of anti-discrimination services.

**PROGRESS:** Inland Fair Housing periodically conducts undercover investigations referred to as "testing". Inland Fair Housing sends volunteers or staff members to play a role or profile to locations where people have experienced some type of discrimination. If these "testers" experience any type of discrimination, Inland Fair housing does contact the landlord or property owner to share these results and explain the anti-discrimination laws.

Action 4: The Fair Housing Council will conduct staff training and community workshops on issues of reasonable accommodations and modifications. A minimum of two trainings/ workshops will be conducted during the 2012-2016 Consolidated Plan.

**PROGRESS:** IFHMB conducts two annual workshops to training City staff, property owners, renters, and residents about each party's rights to fair housing. Typically, one workshop is schedule for late fall and the other workshop is scheduled for early spring of each fiscal year.

Action 5: Offer a rehabilitation grant program that makes homes accessible, safe, and healthy. The objective is to empower elderly persons with disabilities to remain in their homes and provide them with the ability to maintain their self-sufficiency.

**PROGRESS:** A rehabilitation grant program for accessibility has not been a request of the community. In combination with ADA enforcement, the City will create a similar program

Action 6: Continue enforcing Title 24 Disability Access Standards and encourage notifications of violations by providing the appropriate forms on the City's webpage. This action will be ongoing and continuous.

**PROGRESS:** Under the Building Code, single family dwellings are not required to make disability adjustments (ADA) unless the dwelling is a rental property. Single family rental dwellings are required to make these modifications but are complaint driven. In addition, any subsidized housing, such as Section 8, is required to make ADA alterations.

Impediment 3: Access to Fair Housing

The City of Cathedral City is committed to ensuring fair housing choice for the residents.

Recommendation:

Action 7: Review and revise zoning ordinance to remove any provisions, language, and requirements that may be discriminatory or in violation of federal fair housing laws.

**PROGRESS:** The City is in the process of amending its municipal code to include an ordinance that would allow density bonuses for affordable housing in multi-family residential development projects. Density Bonuses are development trades or concessions that applicants will receive in lieu of providing more affordable housing units in the City.

Action 8: Review the City's development fee and processing structure to ensure that it does not impose excessive fees on the construction of housing.

**PROGRESS:** The development fees in Cathedral City are currently the lowest in the Coachella Valley. In fact, the City's fees are the lowest in comparison to other jurisdictions outside the Valley. The City is currently evaluating its fee structure to raise and maintain competitiveness in the development industry.

Impediment 4: Homeownership Opportunities

The City realizes the importance and advantages of homeownership and supports and encourages efforts that assist residents expand their homeownership opportunities.

Recommendation:

Action 10: Promote and provide programs that offer first-time homebuyers, foreclosure recovery, and acquisition assistance. Efforts to expand homeownership opportunities will be ongoing and continuous.

**PROGRESS:** In 2013, Cathedral City applied and was awarded funding from HUD to offer first-time homebuyers, foreclosure recovery, and acquisition assistance through the HOME Program. However, after much discussion, the City decided to decline the award due to lack of staff for administering the program. The City also contracted the County of Riverside to see if there was interest to manage the program on the City's behalf. The County also declined the offer.

The City of Cathedral City is in a better position to manage such as program. The City will explore applying for this type of funding again in order to provide these much needed services in the community.


Action 11: The Fair Housing Council of Riverside County will provide First-Time Homebuyer education services including individual counseling and workshops to give potential buyers the tools they need to avoid predatory lending and foreclosure. Topics to be discussed may include: credit and predatory lending, qualifying for a home loan, budgeting, finding a lender, finding the right home and other issues that arise from owning property. Education efforts to expand homeownership opportunities will occur through the term of all Consolidated Plans prepared by the City of Cathedral City.

**PROGRESS:** The City has seen a substantial increase in housing development and permits being issued. Almost all of the vacant lots are being filled with the construction of new homes. On the other side, the Code Compliance Division has also seen a decline in vacant or abandoned properties. These properties are being rehabilitated and sold. As a result, the City is experiencing a reduction in blight.

IV.1.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and


The City has been successful in achieving its goals due to its partnership with the Inland Fair Housing and Mediation Board. The City works with the agency on a quarterly basis to review local data and fair housing issues and, if needed, take action to ameliorate those issues.

IV.1.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

 Instructions

Any additional policies, actions or steps to achieve past goals, or mitigate problems experienced will be addressed during the completion of the AFH.

IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.


 Instructions

Addressing Fair Housing issues for residents with disabilities was a major goal during the past AI and will continue to be addressed in the current AFH.

## Fair Housing Analysis

### Fair Housing Analysis > Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

 Instructions

 Relevant Data

Cathedral City is located in the Coachella Valley, a sub region of Riverside County. The County encompasses a large portion of Southern California, and over the past two decades has experienced extremely rapid growth. According to Census and Department of Finance data, the County's population increased by 32%, from 1,170,413 in 1990 to 1,545,387 in 2000, and by 44% from 2000 to 2,227,577 in 2012. The incorporated cities of the Coachella Valley generally followed similar trends for population growth within the same time period.

According to the U.S. Census, the City of Cathedral City's population in 1990 was 30,085. In 2000, the population had a dramatic increase of 42% over the 10-year period, growing to 42,647. In 2010, the growth slowed a bit, only increasing by 20% for a total population of 51,200

### Ethnic/ Race Patterns

The Table below, shows the ethnic distribution for Cathedral City and Riverside County from 1990 through 2010. Over the three Census period, Whites and Hispanics remained the dominate Ethnic/ Racial groups in both the Region and the City. For the Region, Whites held the majority of the population until the 2010 Census, which Hispanics were estimated to be 4 percent of the population and whites only 37 percent. However, the 1990 Census count was the last period Whites were the majority of the population in the City. While the 2000 Census showed Hispanics (49%) approximately 7 percent higher in population than Whites (42%), 2010 showed a dramatically wider gap for Hispanics (62%) versus Whites (29%). It is important to note that this precipitous rise in the Hispanic population in 2010 did not correlate to a similar increase in the foreign born population for the City. While the Hispanic population increased by 31 percent from 2000 to 2010, the foreign born population increased by less than 5 percent, which assumes that the City's increased population over the Census periods is largely a result of native born Hispanics.


No other Racial/ Ethnic Group was more than 8 percent of the Region or City population. For the Region, Blacks had their highest population in 2010 with 8.2 percent of the populations, but dropped to 7.1 percent in 2010. That same year, they were less than 2 percent of the City's population. Asians showed a steady growth from 1990 to 2010 in both the Region and City. They represented 6 percent of the Region and close to 5 percent of the City's population in 2010. Native Americans represented the lowest percentage of all Ethnic/ Racial groups in both the Region and City, not surpassing more than 1 percent of the population.

Demographic Trends	(Cathedral City, CA CDBG) Jurisdiction						(Riverside-San Bernardino-Ontario, CA CBSA) Region					
	1990		2000		2010		1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	16,971	61.42%	17,904	42.25%	13,564	29.91%	1,615,830	62.41%	1,540,776	47.33%	1,546,666	36.61%
Black, Non-Hispanic	581	2.10%	1,210	2.86%	894	1.97%	168,731	6.52%	263,322	8.09%	301,523	7.14%
Hispanic	9,097	32.92%	21,040	49.65%	27,953	61.64%	685,672	26.48%	1,228,683	37.75%	1,996,402	47.25%

Asian or Pacific Islander, Non-Hispanic	750	2.71%	1,753	4.14%	2,138	4.71%	93,331	3.60%	164,035	5.04%	261,593	6.19%
Native American, Non-Hispanic	134	0.48%	309	0.73%	172	0.38%	18,007	0.70%	36,061	1.11%	19,454	0.46%
<b>National Origin</b>												
Foreign-born	6,813	24.56%	12,555	29.45%	17,603	34.34%	360,666	13.93%	612,354	18.81%	920,860	21.80%
<b>LEP</b>												
Limited English Proficiency	4,143	14.93%	9,427	22.12%	11,745	22.91%	252,012	9.73%	462,538	14.21%	640,802	15.17%
<b>Sex</b>												
Male	13,892	50.07%	21,350	50.08%	23,406	51.62%	1,294,274	50.00%	1,618,466	49.73%	2,101,083	49.73%
Female	13,851	49.93%	21,277	49.91%	21,940	48.38%	1,294,518	50.00%	1,636,316	50.27%	2,123,768	50.27%
<b>Age</b>												
Under 18	6,801	24.52%	13,593	31.89%	12,582	27.75%	771,845	29.81%	1,044,686	32.10%	1,214,696	28.75%
18-64	16,214	58.45%	23,669	55.52%	26,761	59.02%	1,539,215	59.46%	1,869,817	57.45%	2,570,221	60.84%
65+	4,727	17.04%	5,365	12.59%	6,003	13.24%	277,732	10.73%	340,280	10.45%	439,934	10.41%
<b>Family Type</b>												
Families with children	2,833	41.15%	4,134	57.99%	5,143	52.90%	331,552	50.68%	266,840	54.97%	500,062	50.99%
Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.												
Note 2: Data Sources: Decennial Census; ACS												

In reviewing patterns of Race/Ethnicity location within Cathedral City, Hispanic residents seem to cluster primarily in the center of the City, while White residents are more evenly dispersed. The southern and “out-side core” parts of the City indicate less of a presence of non-White residents. It should also be noted that these regions of the City are more populated by owner occupied housing, as illustrated later on in this study.

V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

 Instructions

### Location of Homeowners

The 2010 census map below shows the primary location of homeowners within the jurisdiction. The darkest blue census tracts indicate more than 80% of Cathedral City's households as homeowners. As illustrated by the map below, the location of these Census tracts are primarily outside the core of the City.

As illustrated by the map below, homeowners within the Region are primarily located outside the geographic boundaries of major metropolitan areas (i.e. City of Riverside and San Bernardino). According to a 2014 study conducted by NerdWallet, a San Francisco based financial firm, "suburbs" in Riverside County – particularly in the southwest- are attractive to homeowners due to their commuting distances to the before mentioned metropolitan areas and job centers.

In addition, the Region's housing is still relatively underpriced compared to other neighboring MSAs located in southern California. Out of 178 national cities with populations over 50,000, Regional cities like Menifee ranks third, Murrieta fourth, Lake Elsinore fifth, Perris eighth and Temecula 10th, based on housing availability, affordability and growth. Other cities in the region faring well in the study included Fontana (No. 17), Yucaipa (No. 18) and Chino Hills (No. 25).

### Location of Renters

Within Cathedral City, Census Tract 06065044915 has the highest percentage of renters (more than 73%). This tract is located in the core of the City and, as illustrated in the previous Race/Ethnicity dot density map, Hispanic residents seem to cluster within this area as well. As previously stated, although the City does not have Racially or Ethnically Concentrated Area of Poverty (a geographic area with significant concentrations of poverty and minority populations), this finding should be explored further as potential ongoing local segregation, or lack of integration.

Loctated in the core of the City, this tract also has more evenly dispersed. The southern and "out-side core" parts of the City indicate less of a present of non-White residents. It should also be noted that these regions of the City are more populated by owner occupied housing, as illustrated later on in this study. Although the City does not have Racially or Ethnically Concentrated Area of Poverty (a geographic area with significant concentrations of poverty and minority populations), this finding should be explored further as potential ongoing local segregation, or lack of integration.

Fair Housing Analysis > General Issues

V. Fair Housing Analysis > B. General Issues > Segregation/Integration

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Analysis

**i** Instructions

V.B.i.1. Analysis

V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

**i** Instructions

**i** Relevant Data

According to the Racial/Ethnic Dissimilarity Trends table below, both Cathedral City and the Region segregation index rose for all racial/ethnic groups from 1990-20120. The exception was Asian or Pacific Islander within Cathedral City which had a slight decrease in level of segregation in 2010.


When comparing the average level of segregation over the three Census periods, no group in Cathedral City experienced higher than “low segregation”. However, for the Region, Blacks and Hispanics experienced “moderate” levels of segregation. It is important to note, that Blacks were the only group not experience higher than “low” segregation within Cathedral City. Conversely, they experienced the highest average percentage of segregation within the Region.


**Table 3 - Racial/Ethnic Dissimilarity Trends**

Racial/Ethnic Dissimilarity Index	(Cathedral City, CA CDBG) Jurisdiction				(Riverside-San Bernardino-Ontario, CA CBSA) Region			
	1990	2000	2010	average	1990	2000	2010	average
Non-White/White	22.59	41.59	45.15	36.44	32.92	38.90	41.29	37.703

Black/White	22.22	32.63	37.31	30.72	43.74	45.48	47.66	45.62
Hispanic/White	23.85	44.44	46.69	38.32	35.57	42.40	43.96	40.64
Asian or Pacific Islander/White	27.21	40.66	40.20	36.02	33.17	37.31	43.07	37.85

V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).

 Instructions

 Relevant Data

Within Cathedral City, Hispanics experienced the highest increase in the groups' segregation index over time. From 1990 to 2000, Hispanics segregation index nearly doubled, increasing by 20.59 percentage points. This is best illustrated by the 1990 and 2000 Race/ Ethnicity density maps for Cathedral City. The 1990 map shows generally an even disbursement of all groups across the Jurisdiction. However, in the 2000 Census year, the location of Hispanics tended to cluster around the core of the City, while the location of Whites was more prominent outside the City's core.

From 2000 to 2010, Hispanics segregation index increase by 3 percentage points to 47 percent, which remained the highest segregation level amongst all groups in both Census years.

V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

 Instructions

### Relevant Data

The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. As previously stated, AFFH mapping for Census year 2000 illustrated a high segregation of Hispanics within the City's core, while the location of Whites was more prominent outside the City's core. The later could indicate a lack of integration which means that there is not a high concentration of people of a particular protected class in an area subject to analysis, such as a census tract or neighborhood, compared to the broader geographic area. Further analysis will be needed to determine an issue of segregation and integration. Along with residential segregation for Hispanics within the City's core, the area also has a high segregation of person from Mexico as their National Origin as well as Limited English Proficiency (see AFFH maps below).

V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

### Instructions

In section V.A-2 of the Fair Housing Analysis are maps illustrating the highest percentage of homeowners and renters within the jurisdiction based on census tracts. The chart below will assist in determining whether such housing (owned vs. rented) is located in segregated or integrated census tracts.

In **BOLD** are census tracts were more than 80 percent of residents are homeowners. When examining the Race/ Ethnicity of these tracts, 85 percent of the residents on average are White, but only 30 percent of the general population. Hispanics only make up 8 percent of residents of these tracts, but 62 percent of the general population. Conversely, the census tract with the highest percentage of renter households (more than 73%) is located in the core of the City (census tract 6065044915). Within this tract, nearly 90 percent of the residents are Hispanic, but only 7percent are White.


% White alone (not% Hispanic)	Persons of Hispanic origin	Tract
39.8	45.94	6065044904
<b>76.97</b>	<b>12.22</b>	<b>6065940600</b>
86.86	11.68	6065941000
<u>6.83</u>	<u>88.86</u>	<u>6065044915</u>
16.43	66.64	6065044926
0	0	6065044807

0	0	6065044522
0	0	6065045103
0	0	6065044520
9.27	89.75	6065044702
86.96	8.15	6065941200
35.83	50.54	6065044923
<b>88.9</b>	<b>6.51</b>	<b>6065940900</b>
40.04	57.52	6065044925
12	83.72	6065044907
<b>90.62</b>	<b>5.62</b>	<b>6065941100</b>
35.71	57.86	6065044924
32.23	65.97	6065044916
43.14	52.32	6065045000
42.97	46.76	6065044932
19.39	62.17	6065044931

The table presents a possible Hispanic segregation issue within the census tracts with the highest percentage (>73%) of renters. In addition, the table presents possible integration issues within census tracts with the highest percentage of homeowners (>80) where approximately 85 percent of residents are White.

Housing segregation describes the voluntary or involuntary separation of areas by race, resulting in neighborhoods where most, if not all, of the residents belong to one race. Title VIII (8) of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination in relation to selling, renting, and financing housing. This includes discrimination based on race, color, national origin, religion, sex, familial status, and disability.

V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).

 Instructions

 Relevant Data

According to the Racial/Ethnic Dissimilarity Trends table above , all racial/ethnic groups experience generally low segregation when compared to Whites in 1990 in both Cathedral City and the Region, with the exception of Blacks who experienced moderate segregation within the Region only.

In 2000, the segregation index rose for all groups in both the City and Region. In Cathedral City, Hispanics, Asians and Non-Whites segregation levels rose from low to moderate. Blacks' segregation index remained low in Cathedral City, but rose to moderate within the Region. Consistent with the 1990 Census year, Hispanics segregation index remained moderate within the Region.

In 2010, Non-whites, Hispanics and Asians experienced moderate segregation when compared to Whites in both Cathedral City and the Region. Blacks also experienced moderate segregation within the Region, but only low segregation within Cathedral City. It is important to note that Blacks were the only group to experience low segregation for all three Census periods within Cathedral City. Conversely, they were the only group to experience moderate segregation for all three Census periods within Region.

V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

 Instructions

### Demographic Trends

The 1990 Census count was the last period Whites were the majority of the population in the City. While the 2000 Census showed Hispanics (49%) approximately 7 percent higher in population than Whites (42%), 2010 showed a dramatically wider gap for Hispanics (62%) versus Whites (29%).

The shift in majority Hispanic population could account for higher segregation of Hispanic residents throughout the jurisdiction as illustrated by the 1990 and 2000 Race/ Ethnicity density maps for Cathedral City. The 1990 map shows generally an even disbursement of all groups across the Jurisdiction. However, in the 2000 Census year, the location of Hispanics tended to cluster around the core of the City, while the location of Whites was more prominent outside the City's core. Although a 2010 Race/ Ethnicity density maps for Cathedral City is currently unavailable, it is likely to show a similar segregation pattern as the 2000 census year. Further analysis is required to determine whether increase patterns of segregation has to do with new Hispanic residents facing policies or private market practices that discourages integration.

### Private Sector Policies and Practices

Fair housing opportunity is covered by Federal and State regulations and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of protected class. Implementation of fair housing practices is achieved through a network of realtors, apartment associations, housing associations, fair housing providers, and the courts. This chapter provides an overview of the private sector housing industry in Cathedral City and its interrelationship with fair housing choice and equal housing opportunity.

Discriminatory practices in home mortgage lending have evolved in the past five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants to the redlining practices of private mortgage lenders and financial institutions, ethnic minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. By employing high pressure sales practices and deceptive tactics, some mortgage brokers pushed minority borrowers into high-cost subprime mortgages that were not well suited to their needs and led to financial problems. According to data from the 2007 Home Mortgage Disclosure Act (HMDA), four of every 10 home purchase mortgages issued to minorities in 2006 were subprime loans twice the number of subprime loans issued to White borrowers.

### **Owner Occupied Housing**

Part of the American dream involves owning a home in a good neighborhood near schools, parks, shopping centers, jobs and other community amenities. Homeownership strengthens individual households and entire neighborhoods because owner-occupants have made an investment in their own personal property as well as the neighborhood and community. This fosters a greater sense of pride in the appearance and condition of not only the home but of the neighborhood as well. It also promotes owner involvement in the community because owner-occupants have a personal stake in the area and tend to be more active in decisions affecting the community. Fair housing opportunity laws protect an individual or family's right to occupy suitable housing in any location. Ensuring fair housing is an important way to not only preserve but to improve the housing opportunities for all residents in Cathedral City.

### **The Homeownership Process**

Purchasing a home presents many challenges to the would-be owner. One of the main challenges in buying a home is the process by which an individual or family must acquire the property. The time required to find a home, the major legal and financial implications surrounding the process, the number of steps required and financial issues to be considered can be overwhelming to prospective buyers. Throughout this time consuming and costly process, fair housing issues can surface in many ways. Discriminatory practices in the home buying process can occur through the:

- Advertising of homes for sale;
- Lending process;
- Appraisal process;
- Actions of real estate agents and sellers; and
- The issuance of insurance.

### **Advertising**

The first thing a potential buyer is likely to do when evaluating a home purchase is search advertisements either in magazines, in newspapers or via the Internet to get a feel for what the market offers. Language in advertising is sometimes an issue within the realm of real estate. Advertisements cannot include discriminatory references such as the use of words describing current or potential residents or the neighbors or the neighborhood in racial or ethnic terms. Some commonly used statements that are discriminatory include the following:

§ Adults preferred

- § Perfect for empty nesters
- § Conveniently located by a particular church
- § Ideal for married couples without kids

Even the use of models in ads has been questioned, based on the idea that it appears to appeal to a certain race. In addition, selecting media or locations for advertising that deny information on listings to certain segments of the housing market could also be considered discriminatory. Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether a protected class is preferred. In cities where there is a sizable Hispanic population, the homeownership process offers opportunities for fair housing violations to arise due to the natural tendency to advertise in a specific language such as Spanish. Although the advertisements might not violate fair housing laws, these advertisements could limit opportunities for other racial/ethnic groups to find housing. Recent litigation has set a precedent for violations in advertisements that hold publishers, newspapers, the Multiple Listing Service, real estate agents and brokers accountable for discriminatory ads. As a reminder to choose words carefully, the Multiple Listing Service now prompts a fair housing message when a new listing is being added.

### **Lending**

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, a credit check, an analysis of ability to repay and the amount for which one is eligible, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA), however, there is no guarantee that individual loan officers or underwriters will not misuse the information. A report on mortgage lending discrimination by the Urban Land Institute outlines four basic stages in which discrimination can occur:

- § Advertising and outreach
- § Pre-application inquiries
- § Loan approval/denial and terms/conditions
- § Loan administration

A number of different individuals take part in the various stages of this process, and any of them could potentially discriminate. Further areas of potential discrimination include differences in the level of encouragement, financial assistance, types of loans recommended, amount of down payment required and level of customer service provided.

### **Real Estate Agents**

Finding a real estate agent is normally the next step, which can be done by looking in newspapers, searching the Internet and primarily through referrals. The agent will find the home that fits a buyer's needs, desires and budget based on the amount they are qualified for by the lending institution. Realtors may act as agents of discrimination by unintentionally or even intentionally steering potential buyers to or from a particular neighborhood. In a jurisdiction with a significant Hispanic population, a real estate agent might assume that a non-Hispanic buyer

would not be interested in living in the city or that Hispanic buyers would prefer living in a Hispanic community. This situation could also apply to other protected classes who might be steered away from certain areas on the presumption that they might not want to live there based on the existing demographic makeup of the neighborhood.

Agents might also discriminate by whom they agree to represent, whom they turn away and the comments they make about their clients. However, the California Association of Realtors (CAR) has included language on many of its forms disclosing fair housing laws to those involved. Many realtor associations also host fair housing trainings and seminars to educate their members on the provisions and liabilities of fair housing laws. The Equal Opportunity Housing Symbol is also located on all forms as a reminder.

### **Appraisals**

Banks order appraisal reports to determine whether a property is worth the amount of the loan requested. Generally speaking, appraisals are based on the comparable sales of properties surrounding the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made and location. Some neighborhoods with higher concentrations of minorities might appraise lower than like properties in neighborhoods with lower concentrations. Unfortunately, this practice is geared toward a neighborhood and not an applicant and therefore is not a direct violation of fair housing law that can easily be addressed. One effect of this practice, however, is that it tends to keep property values lower in a given neighborhood, thereby restricting the amount of equity and capital available to those residents. Individual appraisers are the ones making the decisions on the amounts, thus there is room for flexibility in the numbers. As appraisers are individually licensed, similar to real estate agents, they risk losing their license for unfair practices.

### **Sellers**

A seller might not want to sell his/her house to certain purchasers based on classification biases protected by fair housing laws, or he/she might want to accept offers only from a preferred group. Often, sellers are home when agents show the properties to potential buyers and could develop certain biases based on this contact. Sellers must sign the Residential Listing Agreement and Seller's Advisory forms, which disclose that a seller understands fair housing laws and practices of nondiscrimination. Yet enforcement is difficult because a seller may have multiple offers and choose one based on a bias.

### **Home Loan Activity**

In tandem with the CRA, the HMDA, initially enacted in 1975 and substantially expanded in 1989, required banks to disclose detailed information about their mortgage lending. The law aimed to curb discrimination in such lending to create more equal opportunity to access credit. The disclosure requirement compelled banks, savings and loan associations and other lending institutions to report annually the amounts and geographical distribution of their mortgage applications, origins and purchases disaggregated by race, gender, annual income and other characteristics. The data, collected and disclosed by the Federal Financial Institutions Examination Council (FFIEC), were made available to the public and to financial regulators to determine if lenders were serving the housing needs of the communities where they were located.

Financing impacts the cost of purchase price and the homebuyer's ability to purchase. Interest rates fluctuate to meet national factors. Current interest rates are around 4%, which is relatively low but the changes can impact the affordability to housing. When the financial crisis began in 2007, a loss of confidence in values of secured mortgages resulted in a liquidity crisis causing the U.S. Federal Reserve, Bank of England and the Central Union Bank to interject capital into the financial markets. In 2008, the federal government declared the

nation being in an official recession. The major crisis was focused on the financial sectors. It remained unclear what all of the major factors of the recession were but the impact was detrimental to the national economy therefore, causing the federal government to initiate the Troubled Assets Relief Program (TARP) in October 2008.

The economic conditions resulted in strict lending restrictions that made it difficult for some families to obtain credit in order to qualify for loans. TARP purchases assets and equity from financial institutions in order to improve the situation of the financial sector and addresses the national subprime mortgage crisis. The TARP did not unfreeze the credit markets, which caused the federal government to initiate a stimulus program in February 2009. The stimulus was intended for job creation, offset the loss of State revenue, increase consumer confidence and spending, and help citizens affected by the economic decline and cut taxes. Financing costs in Cathedral City are equivalent to those in other communities throughout the State of California. Financing costs impact the cost of the unit and the homebuyers' ability to purchase.

The table details the latest data regarding the participation rate in the homeownership market by Race for the Riverside-San Bernardino-Ontario area in 2014. The data shows that Whites were the most active in the use of both public backed and conventional home loans. They were the most active with conventional home loans with 24,737 applications submitted in 2014. Of those loans, 1285 was approved. American Indian/ Alaska Native were the least active in the homeownership market for both public backed and conventional financing.

Several factors affect the loan decision such as debt to income ratio, credit score, home equity, employment. A correlation in denial rates may correlate with the applicant's ability to repay the loan. However, the denial rate of homeownership applications of a particular group may indicate the institution of unfair or discriminatory policies and practices which may hinder access to fair housing choice. With the exception of Native Hawaiians who a disproportionately low participation, the differential in denial rate was not more than 5%. Denials based solely on racial factors does not seem to be an issue.

**AGGREGATE TABLE 4-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS**

	Applications Number	Applications Approved	
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	261	15	6%
ASIAN (TOTAL)	1003	44	4%
BLACK OR AFRICAN AMERICAN (TOTAL)	1783	78	4%
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)	274	6	2%
WHITE (TOTAL)	21957	823	4%
JOINT (WHITE/MINORITY RACE) (TOTAL)	783	25	3%
RACE NOT AVAILABLE (TOTAL) 6/	2583	158	6%

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS

	Applications Number	Applications Approved	
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	213	12	6%
ASIAN (TOTAL)	4966	240	5%
BLACK OR AFRICAN AMERICAN (TOTAL)	919	44	5%
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)	227	11	20%
WHITE (TOTAL)	24737	1265	5%
2 OR MORE MINORITY RACES (TOTAL)	22	4	6%
RACE NOT AVAILABLE (TOTAL) 6/	4031	341	6%

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Additional Information

V.B.i.2. Additional Information

V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

 Instructions

**Citizenship**

In United States federal anti-discrimination law, Citizenship is considered a "Protected Class" . The Immigration Reform and Control Act (IRCA), Pub.L. 99-603, 100 Stat. 3445, enacted November 6, 1986, also known as the Simpson–Mazzoli Act, signed into law by Ronald Reagan on November 6, 1986, is an Act of Congress which reformed United States immigration law. The Act came with several provisions including legalizing certain seasonal agricultural immigrants who were consider illegal prior to the law.

According to the National Commission on Fair Housing and Equal Opportunity report, *Moving Toward Equality*, Farmworkers and recent immigrants are forced to live in dilapidated houses, old motels, under porches, in garages, in sheds and out in the open fields, orchards, in caves and lean-tos in canyons. Those who can manage to rent apartments or to own modest homes often live in neighborhoods, unincorporated areas, sometimes geographically isolated, virtually always politically isolated, lacking the amenities that most renters and homeowners take for granted. They far too often cannot gain access to decent, affordable housing in communities with adequate services.

The report also states that these conditions do not happen by chance. They are created by structural and systemic societal causes related to poverty and race. De facto segregation limits choice and opportunity, unequal municipal services often are dependent on what residents look like and what language they speak, municipal under bounding keeps minority areas outside town


boundaries, resulting in reduced access to infrastructure, and limited or no voice in land use and permitting decisions.

In Riverside County in 2008, California Rural Legal Assistance, Inc. (CRLA), representing 30 low-income mobile home park tenants, almost all farmworkers, reached a voluntary agreement, approved by HUD, resolving disputes about farmworker housing and mobile home park code enforcement and housing discrimination based on national origin.

Settlement of the fair housing claims provided \$21 million in much needed housing assistance and community services for farmworkers and another rural poor in eastern Riverside County. HUD conciliated the enforcement agreement after the farmworkers filed fair housing complaints against Riverside County. Tenant fair housing complaints alleged that Riverside County discriminated against farmworkers and others residing in mobile home parks on the basis of their national origin, Hispanic, by engaging in selective and discriminatory code enforcement activity.

According to Census data, there are 129 Cathedral City residents employed in the category of agriculture, forestry, fishing, hunting and mining industry. Although the farm worker population in Cathedral City is minimal, they generally fall into low- and very-low-income categories. In addition, AFFH mapping indicated a high segregation of person from Mexico within the City's core. In order to make sure that Mexican citizens who are farm-workers live in neighborhoods that are not geographically isolated, the City provides the opportunity for farm worker households to obtain rental subsidies, and also provides incentives for developers to maintain affordable units which are available to all segments of the community.

V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

 Instructions

#### **Regional removal of barriers that prevent people from accessing housing in areas of opportunity.**

City Council has directed staff to prepare an inclusionary housing ordinance for the City. Staff is working with the attorney's office on drafting the ordinance. Obviously, there is a required process to follow, which will involve other agencies as well as public meetings, but the City hopes to have the ordinance before the Council by the end of the year.

### **North City Specific Plan**

In 2007, Cathedral City annexed over 1,300 acres into the City's limits north of interstate 10. A specific plan, known as the North City Specific Plan, was adopted in 2009. The specific plan includes not only the lands recently annexed, but lands which have been in the City's corporate limits, and totals 5,000 acres. The Plan estimates the maximum residential buildout potential to be approximately 16,000 dwelling units.

As proposed, the North City Specific Plan will provide for a wide range of residential opportunities, such as a diversity of residential densities, including but not limited to residential estates (RE) at 2 units to the acre and Mixed Use- Urban (MU-U), which allows up to 45 units to the acre.

It should be noted that development is currently constrained by the limited availability of infrastructure in this area. The City is working to extend and expand the availability and capacity of service systems to facilitate development of this important new area. It can be expected that the North City Specific Plan area will begin to develop in this planning period, but that its greatest development activity will occur toward the end of this time frame. However, the City has adequate development sites available for affordable housing in the existing core of the City, and the North City area will not be required to meet its housing needs.

### **Regional**

As part of a 2000 settlement, which was negotiated by HUD under the Fair Housing Act Riverside County agreed to make nearly \$16.1 million in loans and grants for community-wide projects, and agreed to pay about \$747,000 to 24 farm worker families.

Under the \$16.1 million portion of the settlement funded by Riverside County for community-wide projects, the county will:

- Provide at least \$10 million for low-income housing developments over the next 10 years.
- Use \$1.8 million to create and fund a new 40-home single-family housing development.
- Commit \$1.5 million to create a farm worker's services center to be run by Catholic Charities to help farm workers get housing, health care, adult education, job training and jobs, plus another \$24,000 to make farm workers aware of the center. The center will also include showers, toilets, laundry facilities and parking.
- Use \$1.5 million for the Villas Oscar Romero farm worker housing project in Mecca.
- Provide \$750,000 plus technical assistance to improve living conditions at the Torres-Martinez Tribe's mobile home development.
- Modify existing eligibility criteria for 20 potential homeowners who have been displaced from mobile home parks in order to allow them to qualify for a total of \$400,000 from an existing county loan/grant program.
- Commit \$50,000 in HUD funds to create a non-profit housing corporation specializing in farm worker housing, another \$50,000 to publish the results of five-year housing discrimination testing study in the county, and \$10,000 to carry out a community education and outreach plan to combat housing discrimination.

The remaining \$4.2 million in funds will come from these sources: \$3 million in low-interest loans from USDA for a new single-family housing development in Coachella; a \$500,000 grant for the same development from the City of Coachella; and \$700,000 in low-interest loans from USDA for the Torres-Martinez Tribe's mobile home development.

## V. Fair Housing Analysis &gt; B. General Issues &gt; Segregation/Integration &gt; Contributing Factors of Segregation

## V.B.i.3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

**i** Instructions

Community Opposition

Displacement of residents due to economic pressures

Lack of private investments in specific neighborhoods

Land use and zoning laws

Lending Discrimination

Location and type of affordable housing

Private discrimination

## V.B.i.3. Contributing Factors of Segregation - Other

- Community Opposition

The City of Cathedral City reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. The City understands that often the requirement of obtaining a conditional use permit on multiple-family housing projects subjects the project to Community Opposition, even if the project otherwise complies with City regulations.

State law prohibits a local agency from disapproving a low income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of most import: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.

- Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is also called Gentrification. This is a dynamic that emerges in poor urban areas when residential shifts, urban planning, and other phenomena affect the composition of a neighborhood. Urban gentrification often involves population migration as poor residents of a neighborhood are displaced. In a community undergoing gentrification, the average income increases and average family size decreases. This generally results in the displacement of the poorer, pre-gentrification residents, who are unable to pay increased rents, and property taxes, or afford real estate.

Every five years, the US Census Bureau releases its migration report and we've just gotten the exciting data for 2007 through 2011 (via Atlantic Cities), which shows that the largest migration in the country—nearly 42,000 people—was from Los Angeles County to San Bernardino County. Families were leaving LA County because it's cheaper to buy a house. One economist estimated the median price in LA County was more than \$200,000 more than the median price in San Bernardino (The Inland Valley Daily Bulletin). "People go on the freeway and drive until they can find a house they can afford," said an Inland Empire developer. Other possible explanations were new jobs and more space in San Bernardino.

- Lack of public investments in specific neighborhoods, including services or amenities

A number of housing units and neighborhoods in the City are of older construction, and require either rehabilitation or conservation in order to be maintained as viable dwelling units. As such, the City had implemented programs funded by its former Redevelopment Agency to provide funding and assistance in the rehabilitation of housing units. Areas of particular concern continue to include the areas on the edge of the Downtown, the Whitewater neighborhood, the neighborhood north of Dinah Shore Drive and west of Date Palm Drive, and the Dream Homes neighborhood. However, these programs are no longer available due to the statewide dissolution of redevelopment agencies.

- Land use and zoning laws

Land use policies are fundamental to ensuring housing opportunities. The Cathedral City General Plan and the Zoning Ordinance regulate the amount, location, type and density of housing in the City of Cathedral City. Land use policies that do not promote a variety of housing options can impede housing choice.

Development standards include zoning ordinances, subdivision ordinances, and building code requirements. The most far-reaching constraints are those contained in a city's zoning ordinance, which is the most traditional tool used by a local jurisdiction to regulate the use of private land. Zoning regulates the use; density; floor area; setbacks; parking; and placement and mix of residential, commercial, and industrial projects to reflect the community's development goals and objectives.

Cathedral City's General Plan establishes policies and guidelines for all development by identifying locations, distribution, and density of the various land uses. Various land uses are residential, commercial, industrial and open space within the City. The City follows several planning tools to implement its General Plan policies including Specific Plans, Zoning Regulations, and Subdivision ordinance. The General Plan identifies the land available for housing projects and the policies that are incorporated to eliminate or reduce barriers to the provision of affordable housing.

### · Lending Discrimination

In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The CRA is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions.

Based on the earlier review of 2014 HMDA data, Whites were the most active in the use of both public backed and conventional home loans. They were the most active with conventional home loans with 24,737 applications submitted in 2014. Of those loans, 1285 was approved. American Indian/ Alaska Native were the least active in the homeownership market for both public backed and conventional financing.

Several factors affect the loan decision such as debt to income ratio, credit score, home equity, employment. A correlation in denial rates may correlate with the applicant's ability to repay the loan. However, the denial rate of homeownership applications of a particular group may indicate the institution of unfair or discriminatory policies and practices which may hinder access to fair housing choice. With the exception of Native Hawaiians who a disproportionately low participation, the differential in denial rate was not more than 5%. Denials based solely on racial factors does not seem to be an issue.

### · Location and type of affordable housing

The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

The HUD Census Map below shows the location and type of affordable housing within Cathedral City. As illustrated by the map, the type of affordable housing within the City are HUD Multifamily Poperies (2), Low Income Housing Tax Credit Projects (6), and USDA Rural Housing (1). In terms of location, these 9 affordable housing developments are well dispersed through the City and not primarily located in a segregated area (City Core).

### · Private discrimination

The term "private discrimination" refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners' associations, and condominium boards.

During the AFH development a fair housing survey was provided to residents. Seeking to understand the survey takers experience within the private market, the following question was asked: "If you believe or think that you or someone you know encountered housing discrimination, what type was it?". Based on \_\_\_ survey takers, the following are the results:


- Refusing, discouraging, or charging more to rent an apartment or buy a home. 50.00%
- Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood. 16.67%
- Refusing, discouraging, making it difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home 5.56%
- Refusing, discouraging or charging more for home insurance. 0.00%
- Refusing to make a reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability 16.67%

#### V. Fair Housing Analysis > B. General Issues > R/ECAPs

#### V. Fair Housing Analysis > B. General Issues > R/ECAPs > Analysis

#### V.B.ii.1. Analysis


V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

 Instructions

 Relevant Data

N/A

V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

 Instructions

 Relevant Data

N/A

V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).

 Instructions


 Relevant Data

N/A

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Additional Information

V.B.ii.2. Additional Information

V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

 Instructions

N/A

V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.


 Instructions

N/A

## V. Fair Housing Analysis &gt; B. General Issues &gt; R/ECAPs &gt; Contributing Factors of R/ECAPs

## V.B.ii.3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

 Instructions

## V.B.ii.3. Contributing Factors of R/ECAPs - Other

N/A

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disparities in Access to Opportunity


## V. Fair Housing Analysis &gt; B. General Issues &gt; Disparities in Access to Opportunity &gt; Analysis

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disparities in Access to Opportunity &gt; Analysis &gt; Educational Opportunities

## V.B.iii.1. Analysis

## V.B.iii.1.a. Educational Opportunities

V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

 Instructions


 Relevant Data

Table 12 provides index scores or values for the following opportunity indicator indices: Low Poverty; School Proficiency; Labor Market Engagement; Jobs Proximity; Low Transportation Costs; Transit Trips Index; and Environmental Health by race/ethnicity and households below the poverty line. A higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

Based on Table 12, environmental health was the highest opportunity index for all groups within Cathedral City. Conversely, the lowest opportunity for all groups was transportation cost. For residents below the federal poverty line, environmental health remained the highest opportunity index for all groups. Unsurprisingly, poverty ranked as the highest index.

For the Region, job proximity was the highest opportunity index for all groups, while transportation cost was the lowest. This paradox in opportunity could be explained by the high cost of fuel. According GasBuddy.com, a website that tracks recent retail pricing of gas, the average price across the state is \$2.79. Hawaii is a distant second at \$2.57 a gallon. For residents below the federal poverty line within the Region, job proximity was also the highest opportunity index for all groups. However, the lowest opportunity was the labor market. In other words, the location of job opportunities is less the issue than acquiring employment.

<b>Table 12 - Opportunity Indicators, by Race/Ethnicity</b>							
<b>(Cathedral City, CA CDBG) Jurisdiction</b>	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>
<b>Total Population</b>							
White, Non-Hispanic	42.88	48.88	34.44	38.43	31.90	47.35	68.05
Black, Non-Hispanic	33.82	41.62	33.55	37.16	32.35	39.29	67.16
Hispanic	28.24	38.24	31.66	42.68	36.68	39.58	65.89
Asian or Pacific Islander, Non-Hispanic	37.43	51.48	35.79	37.54	32.00	40.68	64.12
Native American, Non-Hispanic	38.54	45.26	34.93	35.22	31.44	43.41	67.82
<b>Population below federal poverty line</b>							
White, Non-Hispanic	37.86	45.61	34.69	38.25	33.51	44.28	68.95
Black, Non-Hispanic	15.22	33.77	22.87	39.84	38.95	46.29	73.45
Hispanic	21.31	34.88	27.50	45.97	40.75	41.58	67.45
Asian or Pacific Islander, Non-Hispanic	27.60	31.52	34.81	44.41	41.41	35.92	71.59
Native American, Non-Hispanic	12.91	30.82	20.70	45.61	44.87	51.54	71.33
<b>(Riverside-San Bernardino-Ontario, CA CBSA) Region</b>	<b>Low Poverty Index</b>	<b>School Proficiency Index</b>	<b>Labor Market Index</b>	<b>Transit Index</b>	<b>Low Transportation Cost Index</b>	<b>Jobs Proximity Index</b>	<b>Environmental Health Index</b>

<b>Total Population</b>							
White, Non-Hispanic	52.61	53.19	34.50	37.96	25.75	49.40	38.01
Black, Non-Hispanic	42.80	44.09	27.18	42.55	31.82	48.67	29.31
Hispanic	37.51	40.97	24.20	43.12	32.68	47.41	29.22
Asian or Pacific Islander, Non-Hispanic	60.42	58.09	43.02	41.92	29.18	48.60	26.57
Native American, Non-Hispanic	41.19	45.70	25.06	36.84	26.34	49.72	41.33
<b>Population below federal poverty line</b>							
White, Non-Hispanic	38.39	44.64	25.55	38.74	29.20	50.12	40.58
Black, Non-Hispanic	27.15	35.02	17.39	43.48	34.78	49.72	30.90
Hispanic	23.78	34.72	16.42	44.76	36.54	49.77	30.32
Asian or Pacific Islander, Non-Hispanic	42.30	44.87	30.51	45.00	37.05	51.79	24.89
Native American, Non-Hispanic	30.24	39.35	20.61	39.17	32.05	52.12	38.58
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							

Table 12 index scores shows that Hispanics had the lowest access to opportunity to proficient schools compared to other groups. When poverty level is factored in, Asian or Pacific Islander and Native Americans had the lowest access to proficient schools in Cathedral City. In the Region, the index score for Hispanic's access to proficient schools is also lower when compared to other race/ethnic groups. However, unlike Cathedral City, Hispanics below the poverty line continues to have the lowest access to proficient schools within the Region.

V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.


**i** Instructions

**i** Relevant Data

The below maps illustrate school proficiency for the Jurisdiction with race/ethnicity, national origin, and family status. The darker the shaded area, the higher the school's proficiency. Based on the maps, the area within the City with the lowest school proficiency had a high concentration of Hispanics based on race/ethnicity, national origin as well as a high percentage of families with children.

Many pundits believe that areas segregated by lower-income ethnic groups often have underperforming schools due to inadequate attention to negative factors facing students in their community. According to a 2015 article, *Race and Schools: The Need for Action*, by Gary Orefield, Civil Rights Project/Proyecto Derechos Civiles, University of California–Los Angeles, schools are expected to create equal outcomes for students who leave their homes severely disadvantaged by family and community poverty, and arrive at their schools to find sometimes unqualified or inexperienced teachers, and leave those schools as soon as they can. Moreover, in many schools with Black and Latino students who are almost entirely poor and teachers who have little or no help in addressing the consequences of deep tensions that often exist in neighborhoods heavily affected by immigration, gangs, and other issues.

V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school  
Which protected class groups are least successful in accessing proficient schools?


 Instructions


School enrollment areas can affect a student's ability to attend a proficient school. Often underperforming school's enrollment areas contain several neighborhoods with high percentage of households with below moderate households and ethnic/racial groups. Conversely, higher performing schools are often in areas with were students are drawn from higher income and less diverse neighborhoods.

According to the article by Brian A. Jacob and Jens Ludwig "*Improving educational outcomes for poor children*", parents should be provided with greater choice of schools for their children through public magnet schools, charter schools, or vouchers for students to attend private schools. Proponents suggest that by creating a marketplace in which parents can select schools, a choice-based system might generate competition among schools that would improve the quality of schools throughout the marketplace. A similar approach on the District level comes from a 2010 law in 2010 called "Choice Districts" which that children from any other school district could transfer to another district without first getting approval—or even seeking it—from their home districts.

## V.B.iii.1.b. Employment Opportunities

## V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.


 Instructions

 Relevant Data

According to the California Employment Development Department (EDD) for October 2012, the Education Industry employs 4,211 persons in City. Retail sales industry employs 2,994 Cathedral City residents while Professional, scientific and waste recycling employs 2,709 persons. Construction jobs employ 2,420 residents. Other employment fields include public administration, wholesale, manufacturing and other relatively new fields employ the remainder of the labor force. Historically, Arts and Retail sales positions do not earn high wages. Cathedral City has the capacity to house and support growth and expansion for various industries. Determining how to create a better balance between jobs and workers in regard to housing is an issue undertaken in the City's General Plan.

According to Table 12 above, all groups had relatively low opportunity to the labor market, averaging an index score of only 34.074. In addition, the disparity gap in access to the before mentioned jobs and labor markets by protected class groups is relatively small. Hispanics had the lowest access to opportunity to jobs (31.66) while Asians had the highest (35.79). For the Region, all groups also had relatively low opportunity to the labor market, averaging an index score of only 30.792. However, the disparity gap in access for the highest and lowest group is more pronounced. Asians had the highest access index as it relates to jobs and labor market (43.02), while Native American and the lowest (25.06) which is nearly a 18 point index difference.

## V.B.iii.1.b.ii. How does a person's place of residence affect their ability to obtain a job?

 Instructions


 Relevant Data

Proximity to jobs can affect the employment outcomes of residents. People who live closer to jobs are more likely to work. They also face shorter job searches and spells of joblessness. Proximity to employment proves particularly important to certain kinds of workers and residents. For instance, the duration of joblessness among black, female, and older workers tends to be more sensitive to job accessibility than it is for other kinds of workers. For poor residents, living closer to jobs increases the likelihood of working and leaving welfare. Proximity matters for lower-income, lower-skill workers in particular because they tend to be more constrained by the cost of housing and commuting. They are more likely to face spatial barriers to employment, thus their job search areas tend to be smaller and commute distances shorter. In

contrast, higher-income, higher-skill workers, who can afford to commute by car and exercise more choice in where they work and live, have more prospects than just the jobs near their neighborhoods and commute longer distances on average (*The growing distance between people and jobs in metropolitan America*- Elizabeth Kneebone and Natalie Holmes Brookings Institute 2015).

The map below illustrates job proximity index by racial/ethnic groups. The darker the shaded Census Tract, the more likely the opportunity to access job opportunities. According to the map, the City's core has the highest segregation of lighter census tracts as well as Hispanics. In other words, Hispanics located in or near the City's core are more likely to find access to job opportunities than other racial/ethnic groups.

V.B.iii.1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

 Instructions

 Relevant Data

As previously stated, all groups had relatively low opportunity to the labor market, averaging an index score of only 34.074. In addition, the disparity gap in access to the before mentioned jobs and labor markets by protected class groups is relatively small. Hispanics had the lowest access to opportunity to jobs (31.66) while Asians had the highest (35.79). For the Region, all groups also had relatively low opportunity to the labor market, averaging an index score of only 30.792. However, the disparity gap in access for the highest and lowest group is more pronounced. Asians had the highest access index as it relates to jobs and labor market (43.02), while Native American and the lowest (25.06) which is nearly a 18 point index difference.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Transportation Opportunities

V.B.iii.1.c. Transportation Opportunities


V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.


 Instructions

 Relevant Data

The map below shows residency patterns of racial/ethnic, national origin, and families with children overlaid by shading that shows low transportation costs at the census tract level. The darker the shaded tract, the least expensive transportation is for the residents. According to the map below, residents located outside the City's Core found access to transportation more difficult due to higher cost.

V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

 Instructions

 Relevant Data

According to Table 12 above, there doesn't seem to be a relevant difference in lack of a reliable, affordable transportation connection between their place of residence and opportunities. However, Native Americans were affected the most with an index difference of 7 compared to Hispanics who were least affected.

Public transportation is an important element when analyzing impediments to housing. Typically, low income, elderly, youth, environmentally conscious and disabled persons rely on mass transit in order to get to work, school, shopping, services and other events. Public transportation in Cathedral City is provided by Sunline Transit Authority (STA). Routes are offered to residents of the Coachella Valley connecting local communities at the east end of the valley starting in Oasis and have connecting routes through the valley to Desert Hot Springs. Cathedral City's route numbers are 111, 32, 30 and 14. Each line connects at different points making transfers to other bus lines possible.

SunDial is a program through STA, provides on-demand curb-to-curb paratransit service to qualifying clients within 1/4 of a mile on either side of Sun Bus routes. Persons interested in riding Sun Dial must request ADA certification must complete an application and provide the necessary documentation to determine eligibility. Applications are available at the Sunline Transit Agency office.

V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

 Instructions

Sunline Transit Agency provides regional transportation by way of bus throughout the Coachella Valley. The Agency's transportation system and routes offer access to much of the City's commercial, industrial, and residential areas. Sunline Bus stops are strategically located along the City's arterial, collection, and some neighborhood streets.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Low Poverty Exposure Opportunities

## V.B.iii.1.d. Low Poverty Exposure Opportunities

V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.

**i** Instructions

**i** Relevant Data

Based on Table 12, Hispanics had the highest exposure to poverty based on protected class followed by African Americans within Cathedral City. However, for residents below the federal poverty level, Native Americans had the highest exposure to poverty followed by African Americans. For the Region, Hispanics had the highest exposure to poverty amongst protected class, including groups below the federal poverty level.

V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?

**i** Instructions

**i** Relevant Data

The map below illustrates location and degree of poverty based on census tracts. The darker shaded census tracts indicate lower exposure to poverty. According to the map, residence within or near the City's core had the highest exposure to poverty.

V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

**i** Instructions

**i** Relevant Data

According to the map, Hispanic residence are disproportionately clustered within or near the City's core, therefore, having the highest exposure to poverty.

V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas

**i** Instructions

According to the map, Hispanic residents compared to other class groups are disproportionately clustered within or near the City's core, which has been determined earlier in the assessment as having the highest poverty rate in the City. Therefore, Hispanics have the highest exposure to poverty.

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > Environmentally Healthy Neighborhood Opportunities and Patterns in Disparities in Access to Opportunity

V.B.iii.1.e. Environmentally Healthy Neighborhood Opportunities

**i** Instructions

**i** Relevant Data

V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

**i** Relevant Data

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. According to Table 12, access to environmentally healthy neighborhoods among all groups is indexed as the highest (66.06) amongst all recorded opportunities within Cathedral City. Asian/Pacific Islanders were the least likely to have access to environmentally healthy neighborhoods by protected class group as indexed at 64.02

For the Region, Asian/Pacific Islanders were also least likely to have access to environmentally healthy neighborhoods by protected class group. This lack of access is 13 index points lower than Native Americans who were the most likely group within the Region to reside in environmentally healthy neighborhoods.

V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

**Relevant Data**

Map 15 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. Consistent with Table 12, the map doesn't appear to show a significant difference in accessing environmentally healthy neighborhoods based on racial/ethnic groups. However, census tracts within the City's core are shaded slightly lighter; therefore, racial/ethnic groups within those tracts have a slightly lower chance of accessing environmentally healthy neighborhoods

**V.B.iii.1.f. Patterns in Disparities in Access to Opportunity**

V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

**Instructions**

Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within Cathedral City. Of the opportunities measured below, Hispanics were indexed the lowest in five of seven categories (Low Poverty, School Proficiency, Labor Market and Environmental Health). No other group ranked lowest in more than one opportunity index.

This pattern is no surprise based on previous analysis. AFH maps illustrated that the five categories of low opportunity experienced by Hispanics occurred primarily within the core of the City. Similarly, the segregation analysis showed a consistent pattern of Hispanics within the City's core. This disproportionate impact of low opportunity for Hispanics located in the City core should be viewed as an impediment to fair housing choice.


(Cathedral City, CDBG) Jurisdiction	Low Poverty CA Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs	
						Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	42.88	48.88	34.44	38.43	31.9	47.35	68.05
Black, Non-Hispanic	33.82	41.62	33.55	37.16	32.35	39.29	67.16

Hispanic	28.24	38.24	31.66	42.68	36.68	39.58	65.89
Asian or Pacific Islander, Non- Hispanic	37.43	51.48	35.79	37.54	32	40.68	64.12
Native American, Non-Hispanic	38.54	45.26	34.93	35.22	31.44	43.41	67.82
	36.182	45.096	34.074	38.206	32.874	42.062	66.608

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Additional Information

V.B.iii.2. Additional Information

V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

 Instructions

The City of Cathedral City is approximately one mile wide sandwiched in between two of the Coachella Valley's most affluent cities: Palm Springs to the west and Rancho Mirage to the east. Access to any businesses, education, or recreational facilities outside Cathedral City are easily accessible through personal or public transportation.

V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).


 Instructions

The cities of Cathedral City and Palm Springs both offer college course for western valley residents. College of the Desert has partnered with the Palm Springs Unified School District to offer college courses at the high schools in each city.

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disparities in Access to Opportunity &gt; Contributing Factors of Disparities in Access to Opportunity

## V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

 Instructions

## V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity - Other

Income

According to the 2010 Census Bureau report the median annual income for Cathedral City is \$45,693 which is over \$17,000 below Riverside County's median income. Approximately 16.3% of families in Cathedral City are living below the poverty line according to the Bureau of labor and Statistics. This is nearly 3% higher than the poverty rate throughout Riverside County. Poverty rates appear to be concentrated in areas of Cathedral City that qualify as low to moderate income.


Income is important when the City evaluates housing and community development needs. low-income families tend to have more constraints when they need to obtain adequate housing or services. Housing and community development planning purposes utilizes data collected in the Comprehensive Housing Affordability Strategy (CHAS).

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disproportionate Housing Needs

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disproportionate Housing Needs &gt; Analysis

## V.B.iv.1. Analysis

V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

 Instructions

 Relevant Data

This section compares the existence of housing problems amongst racial groups against that of the jurisdiction as a whole in an effort to see if any group(s) share a disproportionate burden of the area's housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when persons of a particular racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the aggregate.

In Cathedral City, 53% of residents experienced experiencing any of 4 housing problems, which was higher than the region (50%). Households experiencing any of 4 Severe Housing Problems was also higher for the City (33%) versus the Region at only 28%. Similarly, severe cost burden was higher than (more than 50% of income paid on housing) was 28 %, compared to only 22% for the Region.

**Table 9 - Demographics of Households with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Cathedral City, CA CDBG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA CBSA) Region		
	# with problems	# households	% problems	with # with problems	# households	% problems
<b>Households experiencing any of 4 housing problems*</b>						
<b>Race/Ethnicity</b>						
White, Non-Hispanic	3,820	8,285	46.11%	256,080	620,415	41.28%
Black, Non-Hispanic	234	378	61.90%	56,895	95,260	59.73%
Hispanic	4,895	7,375	66.37%	277,970	457,795	60.72%
Asian or Pacific Islander, Non-Hispanic	380	652	58.28%	37,730	73,754	51.16%
Native American, Non-Hispanic	18	67	26.87%	3,154	6,294	50.11%
Other, Non-Hispanic	94	216	43.52%	11,725	22,795	51.44%
<i>Total</i>	<i>9,430</i>	<i>16,955</i>	<i>55.62%</i>	<i>643,570</i>	<i>1,276,315</i>	<i>50.42%</i>
<b>Household Type and Size</b>						
Family households, <5 people	4,385	8,298	52.84%	319,120	712,850	44.77%
Family households, 5+ people	1,890	2,745	68.85%	163,795	245,315	66.77%
Non-family households	3,150	5,900	53.39%	160,655	318,160	50.50%

Households experiencing any of 4 Severe Housing Problems**	# with severe problems	# severe households	% with severe problems	# with severe problems	# severe households	% with severe problems
<b>Race/Ethnicity</b>						
White, Non-Hispanic	2,019	8,285	24.37%	126,230	620,415	20.35%
Black, Non-Hispanic	109	378	28.84%	32,105	95,260	33.70%
Hispanic	3,255	7,375	44.14%	176,935	457,795	38.65%
Asian or Pacific Islander, Non-Hispanic	229	652	35.12%	21,145	73,754	28.67%
Native American, Non-Hispanic	0	67	0.00%	1,680	6,294	26.69%
Other, Non-Hispanic	78	216	36.11%	6,650	22,795	29.17%
<i>Total</i>	<i>5,675</i>	<i>16,955</i>	<i>33.47%</i>	<i>364,730</i>	<i>1,276,315</i>	<i>28.58%</i>

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS


Note 4: Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the City as well as the Region. They also experienced the highest rate of Severe Housing Problems when compared to other groups in the City as well as the Region.

Households with Severe Housing Cost Burden*	(Cathedral City, CA CDBG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA CBSA) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	1,945	8,285	23.48%	112,395	620,415	18.12%
Black, Non-Hispanic	110	378	29.10%	28,660	95,260	30.09%
Hispanic	2,455	7,375	33.29%	116,490	457,795	25.45%

Asian or Pacific Islander, Non-Hispanic	150	652	23.01%	17,020	73,754	23.08%
Native American, Non-Hispanic	0	67	0.00%	1,300	6,294	20.65%
Other, Non-Hispanic	60	216	27.78%	5,425	22,795	23.80%
<i>Total</i>	<i>4,720</i>	<i>16,955</i>	<i>27.84%</i>	<i>281,290</i>	<i>1,276,315</i>	<i>22.04%</i>
<b>Household Type and Size</b>						
Family households, <5 people	2,384	8,298	28.73%	145,390	712,850	20.40%
Family households, 5+ people	665	2,745	24.23%	51,350	245,315	20.93%
Non-family households	1,675	5,900	28.39%	84,550	318,160	26.57%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						

V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

 Instructions

 Relevant Data

Based on the AFH map below, the area experiencing the greatest housing burden is located in the core of the City which has been determined as a segregated area for Hispanics.

V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

**i** Instructions

**i** Relevant Data

Large families are those with 5 or more persons. Recent Census data indicates that 14% of owner households and 18% of renter households in Cathedral City have five or more members. Some of these households result from the consolidation of multiple families that share housing to reduce housing costs. If consolidated families could obtain affordable housing, fewer large family units would be needed. Large families have a special need for three, four, or more bedroom units. Units of this size, affordable to low- and moderate-income households, are limited.

Organizations such as the Coachella Valley Housing Coalition, which actively constructs affordable housing projects throughout the Valley, have found that units with 4 bedrooms are less in demand than they have been in the past. They attribute this change, in part, to the "Americanization" of Latino and Asian households, which had in the past tended toward multi generational housing opportunities. As these families' cultural basis changes, the need for a larger unit in which two or three generations resides appears to be diminishing.

**Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

Housing Type	(Cathedral City, CA CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing								
Project-Based Section 8								
Other Multifamily								
HCV Program	133	46.83%	75	26.41%	59	20.77%	52	18.31%

Note 1: Data Sources: APSH

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

**i** Instructions

In section V.A-2 of the Fair Housing Analysis are maps illustrating the highest percentage of homeowners and renters within the jurisdiction based on census tracts. The chart below will assist in determining whether such housing (owned vs. rented) is located in segregated or integrated census tracts.

In Bold are census tracts where more than 80 percent of residents are homeowners. When examining the Race/ Ethnicity of these tracts, 85 percent of the residents on average are White, but only 30 percent of the general population. Hispanics only make up 8 percent of residents of these tracts, but 62 percent of the general population. Conversely, the census tract with the highest percentage of renter households (more than 73%) is located in the core of the City (Census tract 6065044915). Within this tract, nearly 90 percent of the residents are Hispanic, but only 7 percent are White.

% White alone (not Hispanic)	% Persons of Hispanic origin	Census Tract
39.8	45.94	6065044904
<b>76.97</b>	<b>12.22</b>	<b>6065940600</b>
86.86	11.68	6065941000
<u>6.83</u>	<u>88.86</u>	<u>6065044915</u>
16.43	66.64	6065044926
0	0	6065044807
0	0	6065044522
0	0	6065045103
0	0	6065044520
9.27	89.75	6065044702
86.96	8.15	6065941200
35.83	50.54	6065044923
<b>88.9</b>	<b>6.51</b>	<b>6065940900</b>
40.04	57.52	6065044925
12	83.72	6065044907
<b>90.62</b>	<b>5.62</b>	<b>6065941100</b>
35.71	57.86	6065044924
32.23	65.97	6065044916
43.14	52.32	6065045000
42.97	46.76	6065044932
19.39	62.17	6065044931

The table presents a possible Hispanic segregation issue within the census tracts with the highest percentage (>73%) of renters. In addition, the table presents possible integration issues within census tracts with the highest percentage of homeowners (>80) where approximately 85 percent of residents are White.

Housing segregation describes the voluntary or involuntary separation of areas by race, resulting in neighborhoods where most, if not all, of the residents belong to one race. Title VIII (8) of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination in relation to selling, renting, and financing housing. This includes discrimination based on race, color, national origin, religion, sex, familial status, and disability.

#### V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Additional Information

##### V.B.iv.2. Additional Information

V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

##### Instructions

#### Elderly and Frail Elderly Persons

Elderly persons are those that are 65 years and older. The 2010 Census shows the elderly population in Cathedral City at 14.7%. Riverside County's elderly population totals 11.6% of the overall population. Frail elderly is considered to be persons 65 years and older that have a disability limiting their mobility and/ or ability to live independently. Data does not exist specifically on frail elderly but Cathedral City's 2012-2016 Consolidated Plan states that 39.1% of residents that are 65 years and older have a disability, or approximately 2,070 people.

The Riverside County Office on Aging provides programs, services, education, and annual assessment of the needs of the elderly. Affordable housing has consistently been identified as a priority each year with three main housing issues that need to be addressed:

1. The number one goal in senior housing is to develop a coordinated system of community-based services that allows older person to remain in their homes and continue to be as self-sufficient for as long as they possibly can. Services vary from personal care services and adult day care facilities to in-home chore service and visitation.

1. Affordability of rental units is also a cause for concern. Low rent housing supplies is a concern among older citizens living off a fixed income.

1. Senior Home Repair facilitates necessary rehabilitation and accessibility improvements. The City included the scope of Senior Home Repair in its Consolidated Plan but does not currently have funding for this program.

#### Persons with Disabilities

Disabilities can be either a physical or mental ailment that prohibits a person from functioning independently in a home or a community. These disabilities can hamper a person's ability to maintain or keep their home. Persons with mental or physical disabilities often times affect a person's earning capability.

Data to record the number of persons with disabilities does not exist for the City of Cathedral City. However, Riverside County's 2009-2014 Consolidated Plan reports that countywide approximately 1.7% of residents with mobility and/or self-care limitations resided in low-income households.

Physical disabilities are addressed by means of special construction features to provide access and safety features within homes and community buildings. The Fair Housing Council reports the highest number of discrimination cases reported in Cathedral City involve issues of disability. Calls made to the housing council regarding disability typically are renters that need home improvements, or live-in assistance that the landlord is not willing or able to provide or allow.

V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.


#### Instructions

Public housing and rental assistance is the responsibility of the Housing Authority of Riverside County. Throughout the County there are 477 public housing units. The Housing Authority administers a Housing Choice Voucher Program, also referred to as Section 8, funding approximately 8,500 families. The voucher program is a tenant based rental assistance rather than a jurisdictional program. Families eligible for the program are able to choose the community they wish to reside and may relocate within the County. Currently, the County has a wait list of 50,000 families. Priority is given to those who are the neediest and least likely to improve on their current living situation in the near future. Throughout Cathedral City the Housing Authority provides Section 8 Rental assistance for approximately 368 units. The total number of vouchers and certificates fluctuates regularly.

## V. Fair Housing Analysis &gt; B. General Issues &gt; Disproportionate Housing Needs &gt; Contributing Factors of Disproportionate Housing Needs

## V.B.iv.3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

 Instructions

The availability of affordable units in a range of sizes

## V.B.iv.3. Contributing Factors of Disproportionate Housing Needs - Other

The availability of affordable units in a range of sizes

Each city is required to analyze existing and projected housing needs and develop an implementation program to describe how the City will attain its housing goals. In addition, the projected housing need must include a locality's fair share of regional housing needs. In 2012, the Southern California Association of Governments (SCAG) approved the Regional Housing Needs Assessment (RHNA) for the 2014-2021 period. The City of Cathedral City's allocation under the RHNA is depicted below.

Income Category	Number of Units
Above Moderate	254
Moderate	110
Low	95
Very Low	70
Extremely Low*	71
Total	600

Source: SCAG 2012/ \*50% of the Very Low income category pursuant to state law.

Carryover of Unaccommodated Need from the Previous Planning Period the Prior Housing Element, adopted in 2009, included Program 1.A.7 to rezone either Assessor's Parcel677-050-017, which consists of 14.69 acres or Assessor's Parcel677-050- 018, which consists of 18.12 acres, to create additional capacity for lower-income housing. Since this program was not completed, this program must be carried over into the new planning period. Pursuant to Government Code Section 65583.2(h), the rezoned site will allow rental and owner multifamily uses by right and require a minimum density of 20 units per acre.

### Affordable Units at Risk

According to the City's 2014 Housing Element, there are 280 rental units in the Mountain View Apartment complex could be released from their restricted status before 2015. In 1994 financing for this project was changed from the FmHA loan (515) to a USDA Rural Development Loan which allows for affordability controls through 2034. However, after 2014 the loan could be pre-paid, which could remove the affordability control. Should the project elect to pre-pay its loan, a number of organizations, including the Coachella Valley Housing Coalition, the Riverside County Housing Authority, or several private sector developers who currently operate affordable housing projects in the City, would be contacted and encouraged to participate in the project's preservation as affordable housing. Based on the City's most recently obtained pro-formas for affordable housing projects, construction costs for replacement of these units would be between \$240,000 and \$325,000 per unit. Purchasing existing affordable units in the area currently is approximately \$100,000 to \$130,000 per unit. Therefore, the preservation of these units is important to the City's affordable housing inventory. Program 2.A.3 describes actions the City will take to facilitate the preservation of affordability covenants for this project.

Fair Housing Analysis > Publicly Supported Housing Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Demographics

V.C.1. Analysis

V.C.1.a. Publicly Supported Housing Demographics

V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

 Instructions

 Relevant Data

According to table 6, All racial/ethnic groups are utilizing Housing Choice Vouchers in Cathedral City for public supported housing. Whites tend to use Housing Choice Vouchers (HCV) at a higher rate (43%) than other racial/ethnic groups. Hispanics uses HCVs at the second highest rate of 40%.

<b>Table 6 - Publicly Supported Housing Residents by Race/Ethnicity</b>								
<b>Race/Ethnicity</b>								
<b>(Cathedral City, CA CDBG) Jurisdiction</b>	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
<b>Housing Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Public Housing								
Project-Based Section 8								
Other Multifamily								
HCV Program	113	43.46%	43	16.54%	104	40.00%	0	0.00%
<b>0-30% of AMI</b>	865	36.65%	70	2.97%	1,310	55.51%	79	3.35%
<b>0-50% of AMI</b>	1,500	29.35%	165	3.23%	2,685	52.54%	114	2.23%
<b>0-80% of AMI</b>	3,125	34.82%	210	2.34%	4,725	52.65%	227	2.53%
<b>(Cathedral City, CA CDBG) Jurisdiction</b>	13,564	29.91%	894	1.97%	27,953	61.64%	2,138	4.71%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								

V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

 Instructions

**Relevant Data**

Housing Choice Vouchers:

When comparing the population as a whole, Blacks tend to use HCV for public supported housing at a much higher percentage than their population as a whole. There are 894 Blacks within Cathedral City, making up 1.97 percent of the total population, of which approximately 17 percent (43) use HCV. Out of the three income categories noted above, Blacks that are 0-50% of AMI uses HCV at a higher percentage than Blacks in other income eligible categories.

White also tend to use HCV for public supported housing at a higher percentage than their population as a whole. There are 13,564 Whites within Cathedral City, making up 30 percent of the total population, of which approximately 43 percent (113) use HCV. Out of the three income categories noted above, Whites that are 0-30% of AMI uses HCV at a higher percentage than Whites in other income eligible categories.

Of the 284 reported HCV units, 49 percent are elderly, which is the highest percentage amongst protected class. Residents with a disability was second at 40 percent.

<b>Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category</b>									
<b>(Cathedral City, CA CDBG) Jurisdiction</b>	<b>Total # units (occupied)</b>	<b>% Elderly</b>	<b>% with a disability*</b>	<b>% White</b>	<b>% Black</b>	<b>% Hispanic</b>	<b>% Asian or Pacific Islander</b>	<b>% Families with children</b>	
<b>Public Housing</b>									
R/ECAP tracts									
Non R/ECAP tracts									
<b>Project-based Section 8</b>									
R/ECAP tracts									
Non R/ECAP tracts									
<b>Other HUD Multifamily</b>									
R/ECAP tracts									
Non R/ECAP tracts									
<b>HCV Program</b>									
R/ECAP tracts									
Non R/ECAP tracts	284	49.30%	40.49%	43.46%	16.54%	40.00%	0.00%	18.31%	

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Fair Housing Analysis > Publicly Supported Housing Analysis > Analysis > Publicly Supported Housing Location and Occupancy and Disparities in Access to Opportunity

#### V.C.1.b. Publicly Supported Housing Location and Occupancy


V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

 Instructions

 Relevant Data

Based on Map 5 below, there does not seem to be a pattern in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas. Hispanic segregation exists within the core of the City. However, public supported housing is evenly dispersed throughout the City.


V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

 Instructions

 Relevant Data

Based on Map 5 above, there does not seem to be patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas. Public supported housing is evenly dispersed throughout the City.

V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?

 Instructions

 Relevant Data

The City of Cathedral City does not have R/ECAPS.


V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

 Instructions

 Relevant Data

The City does not have developments of public housing, properties converted under the RAD, and LIHTC developments.

V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.


 Instructions

 Relevant Data

When comparing the population as a whole, Blacks tend to use HCV for public supported housing at a much higher percentage than their population as a whole. There are 894 Blacks within Cathedral City, making up 1.97 percent of the total population, of which approximately 17 percent (43) use HCV. Out of the three income categories noted above, Blacks that are 0-50% of AMI uses HCV at a higher percentage than Blacks in other income eligible categories.

White also tend to use HCV for public supported housing at a higher percentage than their population as a whole. There are 13,564 Whites within Cathedral City, making up 30 percent of the total population, of which approximately 43 percent (113) use HCV. Out of the three income categories noted above, Whites that are 0-30% of AMI uses HCV at a higher percentage than Whites in other income eligible categories.

V.C.1.b.v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

 Instructions

 Relevant Data

### Elderly

Elderly persons are those that are 65 years and older. The 2010 Census shows the elderly population in Cathedral City at 14.7%. Riverside County's elderly population totals 11.6% of the overall population. Frail elderly is considered to be persons 65 years and older that have a disability limiting their mobility and/ or ability to live independently. Data does not exist specifically on frail elderly but Cathedral City's 2012-2016 Consolidated Plan states that 39.1% of residents that are 65 years and older have a disability, or approximately 2,070 people.

The Riverside County Office on Aging provides programs, services, education, and annual assessment of the needs of the elderly. Affordable housing has consistently been identified as a priority each year with three main housing issues that need to be addressed:

- The number one goal in senior housing is to develop a coordinated system of community-based services that allows older person to remain in their homes and continue to be as self-sufficient for as long as they possibly can. Services vary from personal care services and adult day care facilities to in-home chore service and visitation.

- Affordability of rental units is also a cause for concern. Low rent housing supplies is a concern among older citizens living off a fixed income.
- Senior Home Repair facilitates necessary rehabilitation and accessibility improvements. The City included the scope of Senior Home Repair in its Consolidated Plan but does not currently have funding for this program.

### Persons with Disabilities


Disabilities can be either a physical or mental ailment that prohibits a person from functioning independently in a home or a community. These disabilities can hamper a person's ability to maintain or keep their home. Persons with mental or physical disabilities often times affect a person's earning capability.

Data to record the number of persons with disabilities does not exist for the City of Cathedral City. However, Riverside County's 2009-2014 Consolidated Plan reports that countywide approximately 1.7% of residents with mobility and/or self-care limitations resided in low-income households.

Physical disabilities are addressed by means of special construction features to provide access and safety features within homes and community buildings. The Fair Housing Council reports the highest number of discrimination cases reported in Cathedral City involve issues of disability. Calls made to the housing council regarding disability typically are renters that need home improvements, or live-in assistance that the landlord is not willing or able to provide or allow.

#### V.C.1.c. Disparities in Access to Opportunity

V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

 Instructions


 Relevant Data

Based on previous analysis, disparity in access to opportunities would more than likely be Hispanics residing in publicly supported housing located in the core of the City. Hispanics appear to be experiencing overarching patterns of access to opportunity and exposure to adverse community factors within Cathedral City. Hispanics were indexed the lowest in five of seven categories (Low Poverty, School Proficiency, Labor Market and Environmental Health). No other group ranked lowest in more than one opportunity index.

Fair Housing Analysis > Publicly Supported Housing Analysis > Additional Information

V.C.2. Additional Information

V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

 Instructions

The City of Cathedral City has a number of affordable housing options within its boundaries. These include the following:

### **Built Prior to 1998**

#### Mountain View Apartments

This 280-unit project is located at 68-680 Dinah Shore Drive. The project was completed in three phases completely financed with a FmHA 515 loan. The project was built in 1982, and refinanced in 1997. The complex is restricted to seniors 62 years of age or older, unless disabled or handicapped. Rent is restricted to 30% of the renter's income, and water and trash services are included in the price of rent. The units are restricted to very low and low income households.

#### Corregidor Apartments

This 14-unit project restricted to very low income families was built in 1985 using LPRH housing funds. This project site is owned by the Riverside County Housing Authority and is located at 34-355 Corregidor Drive.

### Cathedral Palms Apartments

This 231-unit project is located at 31750 Landau Boulevard. The project was originally constructed in 1968 and substantially rehabilitated in 1997, using bonds and RDA set aside funds. The project offers 191 studios and 40 two-bedroom apartments to low-income seniors (over 55). Utilities are provided, including water, gas, cable, and domestic trash services.

### Terracing Apartments

This project provides 80 units to low- and moderate-income families consisting of 1 one

bedroom unit, 47 two-bedroom units, 30 three-bedroom units, and 2 four-bedroom units. It is

located at 69-175 Converse Road and was built in 1994. This project was at risk of conversion to market-rate and the Redevelopment Agency provided assistance to ensure continued affordability for an additional 55 years.

### CVHC Duplex Conversion Project

In 1997-1999 the Redevelopment Agency cooperated with the Coachella Valley Housing Coalition to acquire 16 bank-owned duplexes (originally constructed in the 1980's) and convert the units into 32 affordable, single-family, owner-occupied homes through a self-help program, with the families rehabilitating and converting the homes as part of the down-payment at an affordable purchase price.

## **Built During the 1998-2005 Planning Period**

### Casa Victoria

Casa Victoria is a 50-unit project opened in 1999 using HUD 202 funds. This project provides housing for low-income seniors over 62 years of age. Rent is restricted to 30% of their income, and utility allowances are offered. The apartment complex is located at 34-445 Conegidor Drive.

### Heritage Park

Contains 153 units within a two-story complex, including 144 one-bedroom units and 7 two bedroom units and two management units. This project provides housing for low-income seniors over 55 years of age. Water and trash services are included. The project is located at 69-100 McCallum Way.

### Creekside Apartments

Consists of 185 units within a one and two-story complex. There are 41 two-bedroom units, 104

three-bedroom units, and 40 four-bedroom units. This project provides housing for low and very low income families. Water and trash services are included. The project is located at 68-200 33rd Avenue.

### Ocotillo Place

Provides 135 apartments, of which 108 units are for moderate to high income tenants, and 27 units are for very low income tenants. The low income units were acquired using bond financing from CSCDA. The project is located at 69155 Dinah Shore Drive, and was acquired and substantially rehabilitated using a bond issue in 1998. One and two-bedroom units are offered, and tenants pay a small portion of the water and gas bill.

#### Park David Apartments

This 240-unit apartment project for low income seniors (over 55) is located at 27-700 Landau Boulevard. The project contains 120 one-bedroom units and 120 two-bedroom units, and does not supplement any utilities for residents. The complex offers 20% of the units to very low income seniors and 80% to low income seniors, became operational in 2000.

#### Canyon Vista Apartments

This family project offers 90 units, including 9 unrestricted, 37 moderate incomes, 37 low incomes, and 9 very low income units. It is located at 68-605 Corral Road.

#### Casa San Miguel de Allende

This two-story 39-unit project is located in multiple buildings on and around Melrose Drive in the Cove neighborhood, south of East Palm Canyon Drive. The project is restricted to very low income disabled persons. It was opened in 1998, using HOME, RDA, HOPWA, and CDBG funds.

#### **Built During the 2006-2013 Planning Period**

#### Tierra del Sol

This project was under construction in 2007 and operational in July of 2008. It provides 75 one bedroom units to very low income senior households over the age of 62. It was primarily funded with local and HUD 202 funding and rents are 30% of the tenants' income. Tierra del Sol provides gas for hot water. It is located at 37101 W. Buddy Rogers Avenue.

#### Cathedral Town Villas

Located at 36-700 Pick fair Street, this 61 unit apartment complex offers non-age restricted housing to moderate income families. The project was completed in 2006 and occupied in 2007.

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

 Instructions

The rental housing market in Cathedral City includes apartments, townhomes, mobile homes and single-family homes. Typical rents range from \$900 to \$1,350 for 2- or 3-bedroom apartments in complexes. Based on Riverside County income limits and current rental rates, low-, and moderate-income households can find affordable market rents in Cathedral City. However, households with very-low or extremely-low incomes face an "affordability gap." Programs to facilitate development of new assisted rental housing and Section 8 vouchers can help to address this gap, and are discussed in the housing programs section of the Housing Element.

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

### V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

#### Instructions

Lack of private investment in specific neighborhoods

Lack of public investment in specific neighborhoods, including services and amenities

### V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy - Other

Land cost in Cathedral City ranges from \$50,000 to \$70,000 per acre. At a density of 10 units per acre, this equates to \$5,000 to \$7,000 per unit. The affordable housing community estimates that construction costs for affordable housing units are approximately \$250,000 to \$325,000. When added to land cost, this represents a total cost per unit of \$255,000 to \$337,000 per unit. Projects in this cost range can be funded, when including HOME funds, tax credit funds or other programs, and built in the range of 14 to 16 units per acre. Most importantly, the affordable housing community has indicated that projects above this range are not marketable, insofar as more dense projects cannot be built and include the amenities and common areas which make a project a liveable community for the families who are looking for rental units. The Coachella Valley Housing Coalition and Palm Desert Development, which attended the City's workshops during the development of its 2014 Housing Element, clearly stated that they will not plan projects at densities over 16 units per acre, since the higher densities do not allow them to create communities which they can lease, because they cannot provide the services and amenities which create a healthy living environment.


Fair Housing Analysis > Disability and Access Analysis

## Fair Housing Analysis &gt; Disability and Access Analysis &gt; Analysis

## Fair Housing Analysis &gt; Disability and Access Analysis &gt; Analysis &gt; Population Profile

## V.D.1. Population Profile

V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

 Instructions

 Relevant Data

According to Map 17, persons with disabilities are geographically dispersed throughout the City of Cathedral City and not concentrated. Conversely, the Region has two R/ECAPs where persons with disabilities are concentrated. These areas are north Palm Springs and the City of Indio.

Disability Type	<b>(Cathedral City, CA CDBG) Jurisdiction</b>		<b>(Riverside-San Bernardino-Ontario, CA CBSA) Region</b>	
	#	%	#	%
Hearing difficulty	1,974	4.08%	126,641	3.24%
Vision difficulty	1,377	2.85%	88,400	2.26%
Cognitive difficulty	2,409	4.98%	170,114	4.36%
Ambulatory difficulty	3,557	7.36%	241,262	6.18%
Self-care difficulty	1,392	2.88%	102,841	2.63%
Independent living difficulty	2,050	4.24%	170,490	4.37%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

**i** Instructions

**i** Relevant Data

Based on Map 17, north Palm Springs' and Indio's R/ECAPs are primarily disabled seniors (over 64).

**Table 14 - Disability by Age Group**

	<b>(Cathedral City, CA CDBG) Jurisdiction</b>		<b>(Riverside-San Bernardino-Ontario, CA CBSA) Region</b>	
<b>Age of People with Disabilities</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
age 5-17 with Disabilities	588	1.22%	37,092	0.95%
age 18-64 with Disabilities	3,379	6.99%	241,640	6.19%
age 65+ with Disabilities	2,348	4.86%	174,002	4.46%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Fair Housing Analysis > Disability and Access Analysis > Analysis > Housing Accessibility

V.D.2. Housing Accessibility

V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

**i** Instructions

According to City's 2013 Analysis of Impediments, there are not enough accessible units available to satisfy demands and there is a lack of understanding regarding the legal requirements and social responsibilities to provide reasonable accommodation. Reasonable accommodation can be adjustments made to "accommodate" or make the system fair for an individual in need of additional assistance. Reasonable accommodations can also be defined as necessary and appropriate modifications and adjustments not imposing a disproportionate or undue burden to ensure to persons with disabilities the same enjoyments on an equal basis with others humans and fundamental freedoms.

V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

 Instructions

 Relevant Data

Affordable accessible housing units are located evenly throughout the City. There doesn't seem to be a concentration.

V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

 Instructions

 Relevant Data

The City adheres to State guidelines regarding disabled access, and promotes the use of principals of architectural design which aid the disabled. The Americans with Disabilities Act (ADA) requires all new multi-family construction to include a percentage of units be accessible to disabled persons. The City of Cathedral City monitors and requires compliance with these standards as part of the building permit review, issuance, and inspection process.

The City imposes no special requirements or prohibitions on the development of housing for disabled persons beyond the requirements of the Americans with Disabilities Act. There is no concentration restriction for residential care homes. State and federal law does not permit the City to regulate group homes of 6 or fewer residents. Group homes of 7 or more residents are permitted with approval of a conditional use permit in the R-2, R-3, R-M and R-H zones. The City has also adopted procedures for providing reasonable accommodation for persons with disabilities.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

### V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

The City has affordable housing units that are specifically designed for disabled persons. These are located at the Casa San Miguel complex, Tierra Del Sol, and Mountain View Apartments, which accept both senior and disabled residents. Casa San Miguel offers 27 units of Housing for Persons With AIDS (HOPWA), and Tierra Del Sol includes 7 units that are designed for sight, hearing, or mobility impaired persons. In addition, all 75 units at the Tierra Del Sol complex are designed to be adaptable for all types of physical disabilities. The Desert AIDS Project and Working Wonders also provide counseling and assistance to persons with AIDS.

V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

Please see previous response.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disparities in Access to Opportunity

### V.D.4. Disparities in Access to Opportunity

V.D.4.a. To what extent are persons with disabilities able to access the following?

Identify major barriers faced concerning:

- i. Government services and facilities
- ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
- iii. Transportation
- iv. Proficient schools and educational programs
- v. Jobs

i. Government services and facilities

In August 2015, the California Department of Transportation (Caltrans) contracted the National ADA Accrediting & Consulting, Inc. (ADDAC) to notify all cities and counties to assess the requirements set forth in Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990 to determine if Cathedral City is in compliance. Section 504 of the Rehabilitation Act requires agencies that provide Federal financial assistance also have section 504 regulations covering entities that receive Federal aid. Requirements common to these regulations include reasonable accommodation for employees with disabilities; program accessibility; effective communication with people who have hearing or vision disabilities; and accessible new construction and alterations. Since Cathedral City applies for and is, on occasion, awarded federal funding administered by Caltrans, the City was required to evaluate their public facilities to determine ADA compliance. This evaluation of public facilities outlined what alterations are needed in order to be in compliance with the aforementioned ADA regulations. For this reason, Cathedral City contracted Disabilities Access Consultants (DAC) to evaluate and assess public facilities throughout the City. As a result, a comprehensive report was prepared by DAC, on behalf of the City, specifying the areas that were evaluated and if these public facilities are in need of alteration for compliance. Under the CDBG Program, ADA improvements meet the national objective criteria and are classified as an "urgent need" for people with disabilities. The City is proposing to reallocate CDBG funding from the San Joaquin Street Improvements Project to fund the construction of ADA ramps along 30th Avenue, McCallum Way and Vista Chino. These ADA improvements will install and/or bring into compliance existing ADA ramps on portions of 30th Avenue, McCallum Way and Vista Chino.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

see previous response.

iii. Transportation

SunDial is a valley wide, curb to curb paratransit servicing the City and designed to meet the requirements of the Americans with Disabilities Act (ADA). The purpose is to provide next day public transportation service for persons who are unable to use regular SunLine service. SunDial service is available within 3/4 of a mile on either side of any local SunLine route (not including Commuter Link 220 & Line 95).

iv. Proficient schools and educational programs

Palm Springs Unified School District is responsible for ensuring access to proficient schools and educational programs for Cathedral City residents. The district adheres to Section 504 and the American with Disabilities Act. Public Law 94-142, the Education for All Handicapped Children Act, passed in 1975, was the federal legislation that initially resulted in major changes in the way schools served children with disabilities. This law, now called the Individuals with Disabilities Education Act (IDEA), was accompanied by federal funds, was the focal point of schools in serving children with disabilities.

v. Jobs

Employment seekers often face discrimination in hiring practice based on disabilities. Filed on Sept. 28, 2015, a complaint to the Department of Justice alleged that the county of Riverside, which the City is located, discriminated in its employment practices by failing to hire a probation officer applicant because he has epilepsy. The job applicant was qualified for and could perform the job duties associated with the position, but the county withdrew his offer of employment solely because of his controlled epilepsy.

Under the consent decree, which must be approved by the court, the county will pay the applicant \$50,000, offer him the position as a probation officer, provide training on the ADA and file reports on its compliance with the decree and ADA with the Justice Department. The county, which cooperated with the department in this matter, has also taken steps to ensure that its employment processes will be free of disability based discrimination.

Title I of the ADA prohibits employers, such as Riverside County, from discriminating against a qualified individual on the basis of disability in regard to job application procedures, the hiring, advancement or discharge of employees, employee compensation, job training and other terms, conditions and privileges of employment. An employer may also not deny employment opportunities to a job applicant or employee who is otherwise qualified if the denial is based on the need to make reasonable accommodations for the applicant or employee. This matter was based on a referral from the Los Angeles District office of the Equal Employment Opportunity Commission who completed the initial investigation of the facts.

V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The City and other Public entities within the region provides residents upon request reasonable arrangements to ensure accessibility (28 CFR 35.102.35.104 ADA Title 11). A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.


V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

During the development of this AFH, the City did not Stop correcting identify difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

Fair Housing Analysis > Disability and Access Analysis > Analysis > Disproportionate Housing Needs

V.D.5. Disproportionate Housing Needs

V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

 Instructions

**Relevant Data**

Elderly persons are those that are 65 years and older. The 2010 Census shows the elderly population in Cathedral City at 14.7%. Riverside County's elderly population totals 11.6% of the overall population. Frail elderly are considered to be persons 65 years and older that have a disability limiting their mobility and/ or ability to live independently. Data does not exist specifically on frail elderly but Cathedral City's 2012- 2016 Consolidated Plan states that 39.1% of residents that are 65 years and older have a disability, or approximately 2,070 people. Senior Home Repair facilitates necessary rehabilitation and accessibility improvements. The City included the scope of Senior Home Repair in its Consolidated Plan, but does not currently have funding for this program.

## Fair Housing Analysis &gt; Disability and Access Analysis &gt; Additional Information

## V.D.6. Additional Information

V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

**Instructions**

The highest number of calls to the Fair Housing Council of Riverside County over the past Five years in which the caller claimed discrimination was associated with persons with Disabilities. Complaints regarding disability access indicate a shortage of reasonable accommodation. This impediment is relevant due to Cathedral City's large senior and frail elderly populations. The elderly population is expected to increase as the baby boomer populations continue to age.

V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.


**Instructions**

Continue enforcing Title 24 Disability Access Standards and encourage notifications of violations by providing the appropriate forms on the City's webpage. This action will be ongoing and continuous.

## Fair Housing Analysis &gt; Disability and Access Analysis &gt; Disability and Access Issues Contributing Factors

## V.D.7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

 Instructions

## V.D.7. Disability and Access Issues Contributing Factors - Other


- **Lack of local private fair housing outreach and enforcement**
- **Private Discrimination**

**Discussion: IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.**

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis


Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Analysis

V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

 Instructions

Not applicable.

V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?

 Instructions

Cathedral City adheres to both state and federal fair housing law. Below is the State of California Fair Housing and law:

The *Fair Employment and Housing Act* (FEHA) prohibits harassment and discrimination in **employment** because of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, mental and physical disability, medical condition, age, pregnancy, denial of medical and family care leave, or pregnancy disability leave (Government Code sections 12940, 12945, 12945.2) and/or retaliation for protesting illegal discrimination related to one of these categories, or for reporting patient abuse in tax supported institutions. You may file a private lawsuit under the *Fair Employment & Housing Act*. For employment discrimination issues, you **are required** to exhaust your administrative remedies with the Department by securing your Notice of Right to Sue.

This law specifically provides protection from harassment or discrimination in employment because of:

- Age (40 and over)
- Ancestry
- Color
- Religious Creed (including religious dress and grooming practices)
- Denial of Family and Medical Care Leave
- Disability (mental and physical) including HIV and AIDS
- Marital Status
- Medical Condition (cancer and genetic characteristics)
- Genetic Information
- Military and Veteran Status
- National Origin (including language use restrictions)
- Race
- Sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding)
- Gender, Gender Identity, and Gender Expression
- Sexual Orientation

V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

 Instructions

Fair Housing Council of Riverside County, Inc  
3600 Lime Street, #613  
Riverside, CA 92501

(909) 682-6581

Fair Housing Council of Riverside County, Inc. (FHCRC) is a non-profit, HUD-approved organization that fights to protect the housing rights of all individuals. Since 1986, FHCRC has strived to ensure that all individuals will live free from unlawful housing practices and discrimination.

Their mission is to provide comprehensive services which affirmatively address and promote fair housing (anti-discrimination) rights and further other housing opportunities for all persons without regard to race, color, national origin, religion, age, sex, familial status (i.e., presence of children), disability, ancestry, marital status, age, source of income, sexual orientation, genetic information, or other arbitrary factors.

The Fair Housing Council of Riverside County, Inc. (FHCRC) offers a variety of services to the public, which include the following:

- Anti-Discrimination
- Landlord-Tenant
- First-time Homebuyer
- Foreclosure Prevention
- Loan Modification
- One-on-one Counseling
- Keep Your Home California
- Training

#### Inland Fair Housing and Mediation Board

1005 Begonia Avenue

Ontario, CA 91762

(909) 984-2254

Inland Fair Housing and Mediation Board (IFHMB) is a non-profit, public benefit corporation that has served San Bernardino County and parts of Riverside and Imperial Counties in Southern California since 1980. Funded by numerous grants and awards, IFHMB serves as an intermediary to assist individuals in resolving issues related to housing discrimination, homeownership sustainability, rental complaints, and disputes in court through the provision of resource recommendations, education, and mediation.

Located in the City of Ontario with satellite offices in San Bernardino, Victorville, Barstow, Indio, and El Centro, California, IFHMB assists thousands of individuals each year through its numerous programs at no charge to the consumer.

**IFHMB is a values-based, dynamic organization expanding its reach by facilitating and promoting the general well-being of people through research, education, advocacy, counseling and housing.**

## Grants and Awards

- Community Development Block Grant (CDBG)
- Fair Housing Initiative Program (FHIP), Private Enforcement Initiatives (PEI)
- Fair Housing Initiative Program (FHIP), Fair Housing Organization Initiative (FHOI)
- National Community Reinvestment Coalition (NCRC)
- Rural Community Assistance Corporation (RCAC)
- Keep Your Home California (KYHC)

- Consumer Assistance Grant, funded by the Office of the California Attorney General
- Alternative Dispute Resolution, funded by the San Bernardino Superior County Court
- Senior Services Grant, funded by the city of Ontario

Inland Fair Housing and Mediation Board, established in 1980 under the name Inland Mediation Board, was initially formed to help individuals avoid costly court actions and reduce court caseloads by settling landlord/tenant issues through mediation. The agency was organized under the direction of a governing Board of Directors, an executive director, and a pool of Dispute Resolution Programs Act (DRPA) certified mediators.

By 1983, the agency began a collaborative relationship with the California State Department of Fair Employment and Housing (DFEH) to focus on mediation in housing discrimination cases. This relationship further expanded when the agency began to concentrate on housing discrimination concerns and enforcement activities.

On January 5, 1987 Inland Mediation Board filed for articles of incorporation as a non-profit, public benefit corporation. In 1991, the organization began a pilot Alternative Dispute Resolution Program through the County of San Bernardino Superior Courts. This program was expanded in 1993 to encompass unlawful detainer cases, and, in 1994, to include small claims actions.

In 1993, IFHMB was granted awards through the United States Department of Housing and Urban Development's (HUD) Federal Housing Administration to offer a comprehensive Housing Counseling Program to the public. Since that time, IFHMB has been recognized as a HUD Approved Housing Counseling Agency, offering first-time homebuyer education, reverse mortgage counseling, default and foreclosure counseling, and homeless assistance in San Bernardino, Riverside, and Imperial Counties.

On May 19, 1998, Inland Mediation Board began doing business as Inland Fair Housing and Mediation Board as the organization moved further into housing related mediation (fair housing) services. The organization experienced significant growth in the last decade and expanded its programs and services to meet the growing needs of the Southern California community. Today, IFHMB is governed by a volunteer Board of Directors, services over 40,000 residents each year, and maintains a staff of over 30 highly trained mediators, counselors, attorneys, and staff members.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Additional Information

V.E.4. Additional Information

V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Inland Fair Housing and Mediation Board (IFHMB) conducted a review of all fair housing complaints received from the Cathedral City for the fiscal year of 2015-2016. IFHMB staff mapped the location of the complaints and analyzed the type of complaints as a means of identifying trends with fair housing concerns. The objective of this process is to report the specific findings to the City to make officials more aware of the nature of discriminatory housing issues within the city.

In the 2015 fiscal year, there were a total of seven (7) fair housing cases opened by the agency. Of the seven (7) cases, five (5) cases were regarding allegations of disability discrimination, one (1) was regarding allegations of discrimination based on sex discrimination, and one (1) was regarding national origin. Disability discrimination was the primary concern of residents during the period in review. In the five (5) cases with concerns regarding disability discrimination IFHMB provided assistance with reasonable accommodations requests. Three (3) of the disability cases requested information and IFHMB mediators were able to assist these clients by providing clarification on rights and the request process. The informational cases included clients that had questions regarding regulations on the width of doorways for wheelchairs, and issues with smoking and respiratory disabilities. In these cases, IFHMB mediators assisted by providing information about fair housing protections and an informational packet on how to request accommodations.

Aside from informational cases, two (2) cases involved the provision of additional assistance and mediation in seeking accommodations or modifications. One client was a cancer patient whose apartment unit fell into disrepair. The client's symptoms were aggravated by items that needed to be fixed by the landlord, and mediation helped the landlord and tenant engage in an interactive process to discuss the repairs. Another client was recovering from surgery and had difficulty seeking their next place of residence. IFHMB staff were able to inform the resident about their rights and assisted in their search for alternative housing when accommodations were not possible.

The national origin case involved a resident who did not receive timely repairs due to their nationality and limited English proficiency. The fair housing case based on sex involved a woman who alleged discrimination and harassment by her housing provider. In both cases, mediators assisted in providing information and assistance with filing fair housing complaints. The demographic statistics of the above-referenced clients indicated that there were three (3) Hispanic, and four (4) non-Hispanic clients. Additionally, five (5) clients were female, while two (2) were male.

A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramone Drive. According to the 2010 US Census data, this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic.

The pattern that emerges from this period of review is that there are clusters of fair housing calls within Cathedral City. The leading categories of concern are disability discrimination. A targeted campaign of engaging housing providers and tenants in these specific areas with education and outreach materials may be one way to address the issue. IFHMB welcomes the opportunity to collaborate with City staff to determine the most effective means of reaching these communities.

V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City has an agreement with the Inland Fair Housing and Mediation Board (IFHMB) to provide anti-discrimination, landlord-tenant mediation, fair housing training and technical assistance, enforcement of housing rights, administrative hearings, home buyer workshops, lead-based paint programs, and other housing related services for Cathedral City residents. Services are designed to implement fair housing policies and procedures and to provide information concerning fair housing rights and minority rights under existing fair housing laws, which include providing housing opportunities for all persons regardless of race, color, national origin, religion, sex, familial status, disability, ancestry, marital status, or any other arbitrary factors.

Fair Housing Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

#### V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

#### Instructions

Lack of local private fair housing outreach and enforcement

#### V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors - Other

- **Lack of local private fair housing outreach and enforcement**
- **Private Discrimination**

**Discussion: IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.**

**A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramone Drive. According to the 2010 US Census data, this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic.**

Fair Housing Goals and Priorities > Prioritization of Contributing Factors

VI.1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to

opportunity, or negatively impact fair housing or civil rights compliance.

**i** Instructions

<b>Goal</b>	<b>Contributing Factors</b>	<b>Fair Housing Issues</b>	<b>Metrics, Milestones, and Timeframe for Achievement</b>	<b>Responsible Program Participant(s)</b>
Increase levels of integration by Hispanic residents within higher opportunity neighborhoods.	Issues to Mobility	Ongoing local or regional segregation, or lack of integration.	By the 2020 review of the AFH in the Consolidated Annual Performance and Evaluation Report (CAPER), Hispanic Integration levels will increase by 5 percent measured by percentage increase of Hispanic's within the following higher opportunity census tracts: 6065940600, 6065940900, 6065941100.	Engineering Department IFHMB

**Discussion:** The term “issues to mobility” refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers to both Housing Choice Vouchers and other public and private housing options.

Based on the analysis performed in the AFH, Hispanics experienced the highest increase in segregation index over time when compared to other Race/ Ethnicity protected classes. From 1990 to 2000, Hispanics segregation index increased by 20.59 percentage points. This is best illustrated by the 1990 and 2000 Race/ Ethnicity density maps for Cathedral City. The 1990 map shows generally an even disbursement of all groups across the Jurisdiction. However, in the 2000 Census year, the location of Hispanics tended to cluster around the core of the City, while the location of Whites was more prominent outside the City’s core. The later could indicate a lack of integration which means that there is not a high concentration of people of a particular protected class in an area subject to analysis, such as a census tract or neighborhood, compared to the broader geographic area. Along with residential segregation for Hispanics within the City’s core, the area also has a high segregation of person from Mexico as their National Origin as well as Limited English Proficiency.

To meet stated goal, the City will implement the following strategies:

- Work with the Inland Fair Housing and Mediation Board (IFHMB) to provide Mobility Counseling which will include a range of options including, assistance for families for “second moves” after they have accessed stable housing, and ongoing post-move support for families.
- Work IFHMB to increase education to private apartment owners and managers in higher opportunity neighborhoods and census tracts on the benefits of Housing Choice Vouchers
- Work with IFHB to increase testing of multifamily housing market in higher opportunity neighborhoods and census tracts to determine levels of discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant(s)</u>

<p>Improve the community and housing conditions of the Downtown and Dream Home Area</p>	<p>Lack of private investment in specific neighborhoods  Deteriorated and abandoned properties</p>	<p>Disproportionate housing needs based on the "protected classes" of race, color, national origin, religion, sex, familial status, or disability.</p>	<p>Complete a Housing Income Survey of the Dream Home Area by January 2017 to qualify the area as Low to Medium Income.  Complete a comprehensive community development strategy for the Dream Home Area by May 15, 2017.  Identify CDBG funding when possible to assist in revitalizing the Urban Core and Dream Home Area annually</p>	<p>Engineering Department</p>
---	--	--	--	-------------------------------

**Discussion:** A number of housing units and neighborhoods in the City are of older construction, and require either rehabilitation or conservation in order to be maintained as viable dwelling units. As such, the City had implemented programs funded by its former Redevelopment Agency to provide funding and assistance in the rehabilitation of housing units. Areas of particular concern continue to include the areas on the edge of Downtown and the Dream Homes neighborhood. Within these neighborhoods, Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the City. They also experienced the highest rate of Severe Housing Problems when compared to other groups in the City.

This concern was echoed by several residents from these communities when participating in the AFH community meetings. Below is a summary of comments provided by these residents:

- Dream Home Area is ignored by the City.
- Several homes in the area have been abandoned and being inhabited by homeless individuals
- Additional resources should be directed towards the Dream Home area to curb the gang violence
- Additional surveys should be distributed through the area

To meet stated goal, the City will implement the following strategies:

- Conduct a Community Needs Assessment for the Dream Home Area with a particular focus on the need for housing rehabilitation/ replacement and infrastructure improvement.
- Use CDBG and other public/ private investments to improve housing and infrastructure conditions of the Dream HOME Area.
- Continue to identify private and public investment opportunities to redevelop the Downtown with higher density housing and encourage mixed use development where residential units are above commercial businesses.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant(s)</u>

<p>Reduce the number of fair housing complaints based on disability.</p>	<p>Lack of local private fair housing outreach and enforcement  Private Discrimination</p>	<p>Evidence of illegal discrimination or violations of civil rights regulations, or guidance.</p>	<p>The City will see an annual reduction of fair housing complaints based on disabilities as measured by 2016 levels.</p>	<p>Engineering Department  IFHMB</p>
--	--	---	---	--

**Discussion:** IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.

A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramone Drive. According to the 2010 US Census data, this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic.

To meet stated goal, the City will work with the IFHMB to implement a targeted campaign of engaging housing providers and tenants in the aforementioned specific areas with education and outreach materials to address the issue.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Contributing Factors of Segregation

- Community Opposition
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Private discrimination
  - Community Opposition

The City of Cathedral City reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. The City understands that often the requirement of obtaining a conditional use permit on multiple-family housing projects subjects the project to Community Opposition, even if the project otherwise complies with City regulations.

State law prohibits a local agency from disapproving a low income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of most import: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.

#### · Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is also called Gentrification. This is a dynamic that emerges in poor urban areas when residential shifts, urban planning, and other phenomena affect the composition of a neighborhood. Urban gentrification often involves population migration as poor residents of a neighborhood are displaced. In a community undergoing gentrification, the average income increases and average family size decreases. This generally results in the displacement of the poorer, pre-gentrification residents, who are unable to pay increased rents, and property taxes, or afford real estate.

Every five years, the US Census Bureau releases its migration report and we've just gotten the exciting data for 2007 through 2011 (via Atlantic Cities), which shows that the largest migration in the country—nearly 42,000 people—was from Los Angeles County to San Bernardino County. Families were leaving LA County because it's cheaper to buy a house. One economist estimated the median price in LA County was more than \$200,000 more than the median price in San Bernardino ( The Inland Valley Daily Bulletin). "People go on the freeway and drive until they can find a house they can afford," said an Inland Empire developer. Other possible explanations were new jobs and more space in San Bernardino.

#### · Lack of public investments in specific neighborhoods, including services or amenities

A number of housing units and neighborhoods in the City are of older construction, and require either rehabilitation or conservation in order to be maintained as viable dwelling units. As such, the City had implemented programs funded by its former Redevelopment Agency to provide funding and assistance in the rehabilitation of housing units. Areas of particular concern continue to include the areas on the edge of the Downtown, the Whitewater neighborhood, the neighborhood north of Dinah Shore Drive and west of Date Palm Drive, and the Dream Homes neighborhood. However, these programs are no longer available due to the statewide dissolution of redevelopment agencies.

#### · Land use and zoning laws

Land use policies are fundamental to ensuring housing opportunities. The Cathedral City General Plan and the Zoning Ordinance regulate the amount, location, type and density of housing in the City of Cathedral City. Land use policies that do not promote a variety of housing options can impede housing choice.

Development standards include zoning ordinances, subdivision ordinances, and building code requirements. The most far-reaching constraints are those contained in a city's zoning ordinance, which is the most traditional tool used by a local jurisdiction to regulate the use of private land. Zoning regulates the use; density; floor area; setbacks; parking; and placement and mix of residential, commercial, and industrial projects to reflect the community's development goals and objectives.

Cathedral City's General Plan establishes policies and guidelines for all development by identifying locations, distribution, and density of the various land uses. Various land uses are residential, commercial, industrial and open space within the City. The City follows several planning tools to implement its General Plan policies including Specific Plans, Zoning Regulations, and Subdivision ordinance. The General Plan identifies the land available for housing projects and the policies that are incorporated to eliminate or reduce barriers to the provision of affordable housing.

#### Lending Discrimination

In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The CRA is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions.

Based on the earlier review of 2014 HMDA data, Whites were the most active in the use of both public backed and conventional home loans. They were the most active with conventional home loans with 24,737 applications submitted in 2014. Of those loans, 1285 was approved. American Indian/ Alaska Native were the least active in the homeownership market for both public backed and conventional financing.

Several factors affect the loan decision such as debt to income ratio, credit score, home equity, employment. A correlation in denial rates may correlate with the applicant's ability to repay the loan. However, the denial rate of homeownership applications of a particular group may indicate the institution of unfair or discriminatory policies and practices which may hinder access to fair housing choice. With the exception of Native Hawaiians who a disproportionately low participation, the differential in denial rate was not more than 5%. Denials based solely on racial factors does not seem to be an issue.

#### Location and type of affordable housing

The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

The HUD Census Map below shows the location and type of affordable housing within Cathedral City. As illustrated by the map, the type of affordable housing within the City are HUD Multifamily Poperies (2), Low Income Housing Tax Credit Projects (6), and USDA Rural Housing (1). In terms of location, these 9 affordable housing developments are well dispersed through the City and not primarily located in a segregated area (City Core).

#### Private discrimination

The term "private discrimination" refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners' associations, and condominium boards.

During the AFH development a fair housing survey was provided to residents. Seeking to understand the survey takers experience within the private market, the following question was asked: "If you believe or think that you or someone you know encountered housing discrimination, what type was it?". Based on \_\_\_ survey takers, the following are the results:

- Refusing, discouraging, or charging more to rent an apartment or buy a home. 50.00%
- Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood. 16.67%
- Refusing, discouraging, making it difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home 5.56%
- Refusing, discouraging or charging more for home insurance. 0.00%
- Refusing to make a reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability 16.67%

#### V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

N/A

#### V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Contributing Factors of Disparities in Access to Opportunity

##### Income

According to the 2010 Census Bureau report the median annual income for Cathedral City is \$45,693 which is over \$17,000 below Riverside County's median income. Approximately 16.3% of families in Cathedral City are living below the poverty line according to the Bureau of labor and Statistics. This is nearly 3% higher than the poverty rate throughout Riverside County. Poverty rates appear to be concentrated in areas of Cathedral City that qualify as low to moderate income.

Income is important when the City evaluates housing and community development needs. low-income families tend to have more constraints when they need to obtain adequate housing or services. Housing and community development planning purposes utilizes data collected in the Comprehensive Housing Affordability Strategy (CHAS).

#### V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

The availability of affordable units in a range of sizes

The availability of affordable units in a range of sizes

Each city is required to analyze existing and projected housing needs and develop an implementation program to describe how the City will attain its housing goals. In addition, the projected housing need must include a locality's fair share of regional housing needs. In 2012, the Southern California Association of Governments (SCAG) approved the Regional Housing Needs Assessment (RHNA) for the 2014-2021 period. The City of Cathedral City's allocation under the RHNA is depicted below.

Income Category	Number of Units
Above Moderate	254
Moderate	110
Low	95
Very Low	70
Extremely Low*	71
Total	600

Source: SCAG 2012/ \*50% of the Very Low income category pursuant to state law.

Carryover of Unaccommodated Need from the Previous Planning Period the Prior Housing Element, adopted in 2009, included Program 1.A.7 to rezone either Assessor's Parcel677-050-017, which consists of 14.69 acres or Assessor's Parcel677-050- 018, which consists of 18.12 acres, to create additional capacity for lower-income housing. Since this program was not completed, this program must be carried over into the new planning period. Pursuant to Government Code Section 65583.2(h), the rezoned site will allow rental and owner multifamily uses by right and require a minimum density of 20 units per acre.

Affordable Units at Risk

According to the City's 2014 Housing Element, there are 280 rental units in the Mountain View Apartment complex could be released from their restricted status before 2015. In 1994 financing for this project was changed from the FmHA loan (515) to a USDA Rural Development Loan which allows for affordability controls through 2034. However, after 2014 the loan could be pre-paid, which could remove the affordability control. Should the project elect to pre-pay its loan, a number of organizations, including the Coachella Valley Housing Coalition, the Riverside County Housing Authority, or several private sector developers who currently operate affordable housing projects in the City, would be contacted and encouraged to participate in the project's preservation as affordable housing. Based on the City's most recently obtained proffonnas for affordable housing projects, construction costs for replacement of these units would be between \$240,000 and \$325,000 per unit. Purchasing existing affordable units in the area currently is approximately \$100,000 to \$130,000 per unit. Therefore, the preservation of these units is important to the City's affordable housing inventory. Program 2.A.3 describes actions the City will take to facilitate the preservation of affordability covenants for this project.

## Fair Housing Analysis &gt; Publicly Supported Housing Analysis &gt; Contributing Factors of Publicly Supported Housing Location and Occupancy

Lack of private investment in specific neighborhoods

Lack of public investment in specific neighborhoods, including services and amenities

Land cost in Cathedral City ranges from \$50,000 to \$70,000 per acre. At a density of 10 units per acre, this equates to \$5,000 to \$7,000 per unit. The affordable housing community estimates that construction costs for affordable housing units are approximately \$250,000 to \$325,000. When added to land cost, this represents a total cost per unit of \$255,000 to \$337,000 per unit. Projects in this cost range can be funded, when including HOME funds, tax credit funds or other programs, and built in the range of 14 to 16 units per acre. Most importantly, the affordable housing community has indicated that projects above this range are not marketable, insofar as more dense projects cannot be built and include the amenities and common areas which make a project a liveable community for the families who are looking for rental units. The Coachella Valley Housing Coalition and Palm Desert Development, which attended the City's workshops during the development of its 2014 Housing Element, clearly stated that they will not plan projects at densities over 16 units per acre, since the higher densities do not allow them to create communities which they can lease, because they cannot provide the services and amenities which create a healthy living environment.

## Fair Housing Analysis &gt; Disability and Access Analysis &gt; Disability and Access Issues Contributing Factors

- **Lack of local private fair housing outreach and enforcement**
- **Private Discrimination**

**Discussion: IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.**

## Fair Housing Analysis &gt; Fair Housing Enforcement, Outreach Capacity, and Resources Analysis &gt; Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Lack of local private fair housing outreach and enforcement

- **Lack of local private fair housing outreach and enforcement**
- **Private Discrimination**

**Discussion: IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.**

**A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramone Drive. According to the 2010 US Census data,**

**this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic.**

## Fair Housing Goals and Priorities > Fair Housing Goals

VI.2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

 Instructions

### Goal

#### **Goal**

Increase levels of integration by Hispanic residents within higher opportunity neighborhoods

#### **Contributing Factors**

Issues to Mobility

#### **Fair Housing Issues**

Ongoing local or regional segregation, or lack of integration.

#### **Metrics, Milestones, and Timeframe for Achievement**

By the 2020 review of the AFH in the Consolidated Annual Performance and Evaluation Report (CAPER), Hispanic Integration levels will increase by 5 percent measured by percentage increase of Hispanic's within the following higher opportunity census tracts: 6065940600, 6065940900, 6065941100.

#### **Responsible Program Participant(s)**

Cathedral City, CA

#### **Discussion**

The term “issues to mobility” refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers to both Housing Choice Vouchers and other public and private housing options.

Based on the analysis performed in the AFH, Hispanics experienced the highest increase in segregation index over time when compared to other Race/ Ethnicity protected classes. From 1990 to 2000, Hispanics segregation index increased by 20.59 percentage points. This is best illustrated by the 1990 and 2000 Race/ Ethnicity density maps for Cathedral City. The 1990 map shows generally an even disbursement of all groups across the Jurisdiction. However, in the 2000 Census year, the location of Hispanics tended to cluster around the core of the City, while the location of Whites was more prominent outside the City’s core. The later could indicate a lack of integration which means that there is not a high concentration of people of a particular protected class in an area subject to analysis, such as a census tract or neighborhood, compared to the broader geographic area. Along with residential segregation for Hispanics within the City’s core, the area also has a high segregation of person from Mexico as their National Origin as well as Limited English Proficiency.

To meet stated goal, the City will implement the following strategies:

- Work with the Inland Fair Housing and Mediation Board (IFHMB) to provide Mobility Counseling which will include a range of options including, assistance for families for “second moves” after they have accessed stable housing, and ongoing post-move support for families.
- Work IFHMB to increase education to private apartment owners and managers in higher opportunity neighborhoods and census tracts on the benefits of Housing Choice Vouchers

Work with IFHB to increase testing of multifamily housing market in higher opportunity neighborhoods and census tracts to determine levels of discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

## Goal

### **Goal**

Improve the community and housing conditions of the Downtown and Dream Home Area

### **Contributing Factors**

- Lack of private investment in specific neighborhoods
- Deteriorated and abandoned properties

### **Fair Housing Issues**

Disproportionate housing needs based on the “protected classes” of race, color, national origin, religion, sex, familial status, or disability.

**Metrics, Milestones, and Timeframe for Achievement**

- Complete a Housing Income Survey of the Dream Home Area by January 2017 to qualify the area as Low to Medium Income.
- Complete a comprehensive community development strategy for the Dream Home Area by May 15, 2017.
- Identify CDBG funding when possible to assist in revitalizing the Urban Core and Dream Home Area annually

**Responsible Program Participant(s)**

Cathedral City, CA

**Discussion**

A number of housing units and neighborhoods in the City are of older construction, and require either rehabilitation or conservation in order to be maintained as viable dwelling units. As such, the City had implemented programs funded by its former Redevelopment Agency to provide funding and assistance in the rehabilitation of housing units. Areas of particular concern continue to include the areas on the edge of Downtown and the Dream Homes neighborhood. Within these neighborhoods, Hispanics experienced highest rate of housing cost burden, overcrowding, and substandard housing when compared to other groups in the City. They also experienced the highest rate of Severe Housing Problems when compared to other groups in the City.

This concern was echoed by several residents from these communities when participating in the AFH community meetings. Below is a summary of comments provided by these residents:

- Dream Home Area is ignored by the City.
- Several homes in the area have been abandoned and being inhabited by homeless individuals
- Additional resources should be directed towards the Dream Home area to curb the gang violence
- Additional surveys should be distributed through the area

To meet stated goal, the City will implement the following strategies:

- Conduct a Community Needs Assessment for the Dream Home Area with a particular focus on the need for housing rehabilitation/ replacement and infrastructure improvement.
- Use CDBG and other public/ private investments to improve housing and infrastructure conditions of the Dream HOME Area.

Continue to identify private and public investment opportunities to redevelop the Downtown with higher density housing and encourage mixed use development where residential units are above commercial businesses.

**Goal****Goal**

Reduce the number of fair housing complaints based on disability.

**Contributing Factors**

- Lack of local private fair housing outreach and enforcement
- Private Discrimination

**Fair Housing Issues**

Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.

**Metrics, Milestones, and Timeframe for Achievement**

The City will see an annual reduction of fair housing complaints based on disabilities as measured by 2016 levels.

**Responsible Program Participant(s)**

Cathedral City, CA

**Discussion**

IFHMB opened 28 fair housing complaints from the residents of Cathedral City during this period. 22 of the complaints were for disability discrimination. The agency did not open more than 1 case for any of the other protected categories during this timeframe. The results show that 14 of the 22 disability cases or 63% of the cases opened concerned a reasonable modification or accommodation request. Reasonable accommodations and modifications requests are an area of the law that requires housing providers and tenants to have an understanding of the Fair Housing Act and its accompanying regulations.

A spatial review of the cases indicates that the calls from this period of review came from the central part of Cathedral City. Specifically, they came from Census Tracts 449.07, 449.15 and 449.16. These census tracts include areas near the cross streets of Date Palm Drive and Dinah Shore Drive, and also Cathedral Canyon Drive and Ramone Drive. According to the 2010 US Census data, this area is among the most densely populated areas in Cathedral City. Also, this area also has a high proportion of estimated renters and a high number of people in poverty. These census tracts are also predominantly Hispanic.

To meet stated goal, the City will work with the IFHMB to implement a targeted campaign of engaging housing providers and tenants in the aforementioned specific areas with education and outreach materials to address the issue.

## Documents

File	Description	Uploaded	User
2016 CDBG Community Participation Plan (CPP).v2.pdf (/Afh/Document/View/177)	Citizen Participation Plan	10/8/2016 3:33:15 PM	MXR799
Notice of Availability_CPP.pdf (/Afh/Document/View/178)	City of Cathedral City Notice of Availability Draft Community Participation Plan	10/8/2016 3:36:31 PM	MXR799
Notice of Community Meeting English and Spanish-Meeting 2.pdf (/Afh/Document/View/179)	Notice of Community Meeting English and Spanish-Meeting 2	10/8/2016 3:38:05 PM	MXR799
Notice of Availability- Draft AFH (3).pdf (/Afh/Document/View/180)	City of Cathedral City Notice of Availability for Public Comment Draft Assessment of Fair Housing (AFH)	10/8/2016 3:41:23 PM	MXR799
Cover Sheet - AFH.pdf (/Afh/Document/View/181)	Signature sheet	10/8/2016 3:57:53 PM	MXR799
Proof of Publication - AFH Draft.pdf (/Afh/Document/View/182)	AFH Public Notice	10/10/2016 10:53:35 AM	MXR799
Cathedral City AFH Discussion Memo 11-03-16.docx (/Afh/Document/View/250)	Cathedral City AFH	11/8/2016 7:10:42 PM	H49215
11.30.2016 Further Information Provided by Cathedral City (1 of 2).pdf (/Afh/Document/View/356)	Correspondence re: first revision provided by Cathedral City	12/7/2016 6:34:22 PM	H49215
Reponse to HUD.docx (/Afh/Document/View/357)	First revision provided by Cathedral City	12/7/2016 6:34:54 PM	H49215
12.6.2016 Further Information Provided by Cathedral City (2 of 2).pdf (/Afh/Document/View/358)	Correspondance re: second revision provided by Cathedral City	12/7/2016 6:35:31 PM	H49215

File	Description	Uploaded	User
Reponse to HUD 12_6.docx (/Afh/Document/View/359)	Second revision provided by Cathedral City	12/7/2016 6:36:07 PM	H49215
12.2.2016 Request for Further Information from Cathedral City (2 of 2).pdf (/Afh/Document/View/360)	Second request for additional information	12/7/2016 6:37:11 PM	H49215
12.2.2016 Request for Further Information from Cathedral City (2 of 2).pdf (/Afh/Document/View/361)	Second request for additional information	12/7/2016 6:37:51 PM	H49215
12.2.2016 Request for Further Information from Cathedral City (2 of 2).pdf (/Afh/Document/View/362)	Second request for additional information	12/7/2016 6:37:54 PM	H49215
11.10.2016 DAS Outreach Email.pdf (/Afh/Document/View/363)	DAS email to RDs approving communication with program participants	12/7/2016 6:40:51 PM	H49215
11.18.2016 Request for Further Information (1 of 2).pdf (/Afh/Document/View/364)	First request for additional information	12/7/2016 7:21:00 PM	H49215
Cathedral City acceptance with Notes letter - 120716.pdf (/Afh/Document/View/365)		12/8/2016 6:35:54 PM	H08167

## Maps

### Map 1 - Race/Ethnicity (Race/Ethnicity)

Cathedral City, California Jurisdiction (.../ArcGisV03/Map/V03/100/060624/J)  
 Riverside-San Bernardino-Ontario, CA Region (.../ArcGisV03/Map/V03/100/060624/R)

### Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 1990 and Race/Ethnicity Trends, 2000)

#### Race/Ethnicity Trends, 1990

Cathedral City, California Jurisdiction (.../ArcGisV03/Map/V03/200/060624/J)  
 Riverside-San Bernardino-Ontario, CA Region (.../ArcGisV03/Map/V03/200/060624/R)

#### Race/Ethnicity Trends, 2000

Cathedral City, California Jurisdiction (.../ArcGisV03/Map/V03/201/060624/J)  
 Riverside-San Bernardino-Ontario, CA Region (.../ArcGisV03/Map/V03/201/060624/R)

### Map 3 - National Origin (National Origin)

Cathedral City, California Jurisdiction (.../ArcGisV03/Map/V03/300/060624/J)  
 Riverside-San Bernardino-Ontario, CA Region (.../ArcGisV03/Map/V03/300/060624/R)

### Map 4 - LEP (Limited English Proficiency)

Cathedral City, California Jurisdiction (.../ArcGisV03/Map/V03/400/060624/J)

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



June 28, 2021

Robert Rodriguez, Director of Planning/Building  
Community Development Department  
Cathedral City  
68700 Avenida Lalo Guerrero  
Cathedral City, CA 92234

Dear Robert Rodriguez:

**RE: Review of Cathedral City's 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the Cathedral City's (City) draft housing element received for review on April 30, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a phone conversation on June 14, 2021, with Tami Scott, Administrative Services Director, and consultants Nicole Sauviat Criste and Leisa Lukes.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of October 15, 2021 for Southern California Association of Governments (SCAG) localities. If adopted after this date, Government Code section 65588, subdivision (e)(4), requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: [http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375\\_final100413.pdf](http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

HCD is committed to assisting Cathedral City in addressing all statutory requirements of Housing Element Law. If you have any questions or need additional technical assistance, please contact Fidel Herrera at [fidel.herrera@hcd.ca.gov](mailto:fidel.herrera@hcd.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "Shannan West". The signature is written in a cursive, flowing style.

Shannan West  
Land Use & Planning Unit Chief

Enclosure

## APPENDIX CITY OF CATHEDRAL CITY

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### A. Review and Revision


*Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)*

As part of the evaluation of programs in the past cycle (pages III- 65-76), the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers and persons experiencing homelessness).

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


1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

The element has some basic information from an Assessment of Fair Housing prepared in 2016 on racial dissimilarity, concentrated areas of poverty and fair housing services. However, the element generally does not address this requirement. The element, among other things, must include outreach, an assessment of fair housing, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. For more information, please contact HCD and visit <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.


2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)* 

While the element includes some information on the age of the housing stock, it must also estimate the number of units in need of rehabilitation and replacement. For example, the analysis could use code enforcement activity to calculate a city-wide estimate. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

**Parcel Listing:** The element lists parcels by acreage, general plan and zoning but must also (1) include individual acreages and parcel numbers for Site 1 and any other site assumed to be consolidated, (2) identify the affordability levels of all the units on identified sites and (3) adjust capacity numbers, if necessary, based on a complete analysis of realistic capacity. 

In addition, Site 12 in the review and revise section (page 66) states that the site was rezoned to R4 with minimum density of 20 dwelling units per acre (du/ac), and maximum of 30 du/ac; however, it also states that, at the owner's request, the site was rezoned to R3 for a maximum density of 20 du/ac. The element should clarify the current zoning for Site 12 and utilize the site toward the appropriate income group based on allowable densities.

**Zoning for Lower-Income Households:** The element must demonstrate zoning  appropriate to accommodate housing for lower-income households. For communities with densities that meet specific standards (allow at least 30 units per acre for Cathedral City), no analysis is required. Otherwise, the element must include an analysis based on, including but not limited to, factors such as market demand, financial feasibility and development experience within identified zones demonstrating how the adopted densities can accommodate housing for lower-income households. The element appears to rely on densities allowing up to 20 units per acre to accommodate the housing need of lower-income households. This density is far less than the 30 units per acre standard "deemed appropriate" in statute. For your information; generally, HCD has not accepted densities of 20 units per acre in areas comparable to Cathedral City. The element should adjust the densities deemed appropriate to accommodate the housing needs of lower-income households. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#zoning>.

**Realistic Capacity:** While the element includes an estimate of the number of units that can be accommodated on each site in the inventory, the estimate should rely on established minimum density standards or include analysis demonstrating how the

number of units for each site was determined. For example, Sites 3 through 11 appear to assume maximum density. The element should include an analysis of how realistic density proposed was calculated. The estimate of the number of units for each site must be adjusted as necessary, based on the land-use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in the City and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

In addition, the element appears to assume residential development on sites zoned for nonresidential uses but to support this assumption, the element must analyze the likelihood of residential in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs.

For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#zoning>.

Large Sites: The element identifies sites greater than 10 acres. For example, Site 11 is a large site of 30.57 acres, and Site 2 identifies 7 of 79 acres. Sites greater than 10 acres are not eligible absent a demonstration that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless other evidence is provided. If utilizing these sites toward the housing need for lower-income households, the element must include analysis and programs as appropriate. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml>.

Small Sites: The element identifies several sites smaller than half an acre. In addition, Site 1 includes multiple sites that do not include the size. Sites smaller than a half acre in size are deemed inadequate to accommodate housing for lower-income households unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower-income housing. As a result, if utilizing these sites toward the housing need for lower-income households, the element must include analysis and programs as appropriate. For additional information, see the Building Blocks at <https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml>.

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, rezones sites to permit housing development by right pursuant to statutory requirements. The element

must clarify if sites used to accommodate the housing need for lower income households were previously identified in prior planning periods and include programs as appropriate. For additional information, see HCD's Housing Element Sites Inventory Guidebook at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

Availability of Infrastructure: While the element includes information on water capacity, it must also address sewer capacity sufficient to accommodate the regional housing need allocation (RHNA). For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental>.






Environmental Constraints: While the element generally describes a few general environmental conditions within the City (page III-51), it must also describe any known environmental constraints in the sites identified that could impact housing development in the planning period. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental>.

Affirmatively Furthering Fair Housing: The element must demonstrate the sites inventory affirmatively furthers fair housing. For more information, see HCD's guidance at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.


Water and Sewer Priority: For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. While the element states the City water providers will grant priority service to affordable projects, the element must also address these requirements for sewer providers. For additional information and sample cover memo, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.


Zoning for a Variety of Housing Types: The element must demonstrate zoning to encourage and facilitate a variety of housing types, as follows:


- *Emergency Shelters*: The element describes the Institutional Housing Overlay District (P/IH); however, it should clarify whether shelters are permitted without discretionary action. In addition, the element must evaluate the available acreage for characteristics like parcel size or potential redevelopment or reuse opportunities, proximity to services and describe development standards. The analysis must also address the appropriateness of other uses in the P/IH zone for human habitation and whether parking requirements are limited to staff working in the emergency shelters and do not require more parking than other residential or commercial uses in the zone. The element must include programs as appropriate based on the outcomes of this analysis. 
- *Permanent Supportive Housing*: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate. 
- *Employee Housing*: The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.). Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. 
- *Mobilehome and Manufactured Housing*: The element must demonstrate the City's zoning code allows and permits manufactured housing in the same manner and in the same zone(s) as conventional or stick-built structures are permitted (Gov. Code, § 65852.3). Table 38 on page III-45 does not include manufactured housing, and there was no analysis included. Specifically, manufactured homes should only be subject to the same development standards that a conventional single-family residential dwelling on the same lot would be subject to, with the exception of architectural requirements, for roof overhang; roofing material; and siding material (Gov. Code, § 65852.3, subd. (a)). However, any architectural requirements for roofing and siding material shall not exceed those which would be required of conventional single-family dwellings constructed on the same lot (Gov. Code, § 65852.3, subd. (a)). 
- *Accessory Dwelling Units (ADUs)*: The housing element indicates ADUs are only permitted through a conditional use permit (CUP) in residential zones. Generally, development applications for ADUs are required to be considered ministerially without discretionary review or a hearing. The element should include a program to review and revise the ADU ordinance and make changes as appropriate to be consistent with current State Law. For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/accessory-dwelling-units.shtml>. 


4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of*


*housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land-use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element must identify and analyze all impacts of relevant land-use controls for potential constraints on the cost, supply, timing, and certainty of housing. The element's Table 39 on page III-47 state that the R3 and R4 zones allow 35 feet for building height but should also clarify if three stories are allowed in those zones and analyze whether development standards facilitate achieving maximum allowable densities. 

Building Codes and Code Enforcement: The element must clarify which building code is utilized, including any local amendments, describe the City's building and zoning code enforcement processes and analyze impacts as potential constraints on housing supply and affordability. For additional information and a sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml>. 

Fees: While the element describes the City's development fees, it must describe all required fees for single family and multifamily housing development, including planning fees (e.g., CUP, rezone, variance, general plan amendments), and analyze their impact as potential constraints on housing supply and affordability. For additional information and a sample analysis and tables, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>. 

Processing and Permit Procedures: The element describes design review approval for multi-family projects; however, it must also analyze the process for impacts on cost, supply, and approval certainty. For example, the analysis should describe required approval findings and discuss whether objective standards and guidelines improve development certainty and mitigate cost impacts. The element must demonstrate this process is not a constraint or it must include a program to address this permitting requirement, as appropriate. For additional information, see the *Building Blocks* at <https://www.hcd.ca.gov/community-development/building-blocks/constraints/processing-permitting-procedures.shtml>. 

Housing for Persons with Disabilities: The element notes group homes for seven or more persons are permitted in all residential zones subject to a CUP. The element should analyze the process as a potential constraint on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes objectively with approval certainty. Secondly, the element explains a reasonable accommodation procedure was adopted but should also list and analyze approval findings. Lastly, the element should identify and analyze any definition of 

family. The element must include programs as appropriate based on the outcomes of a complete analysis.

SB 35 Streamlined Ministerial Approval Process: The element must identify and analyze written procedures for the SB 35 Streamlined Ministerial Approval Process.

Zoning, Development Standards and Fees: The element must clarify its compliance with new transparency requirements for posting all zoning, development standards and fees for each parcel on the jurisdiction's website.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. (Gov. Code, § 65583, subd. (a)(6).)*

Identified Densities and Approval Times: The element did not address these requirements. The element must address requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for housing development and submittal of application for building permits. The analysis must address any hinderances on housing development and programs should be added as appropriate.

6. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Farmworkers: While the element identifies a quantification from the American Community Survey (ACS) for residents employed in the "agriculture, forestry, fishing, hunting, mining" industry"; it must also include an estimate of the number of permanent and seasonal farmworkers within the community. The estimate could be from the United States Department of Agriculture (USDA).

Persons with Developmental Disabilities: The element must quantify the number of persons with developmental disabilities and analyze the special housing needs of persons with developmental disabilities. The term developmental disability refers to a severe and chronic disability attributable to a mental or physical impairment, such as cerebral palsy, epilepsy, or autism that begins before individuals reach adulthood. (Welfare and Institutions Code, § 4512.) The analysis could include the following:

- a quantification of the total number of persons with developmental disabilities;

- a description of the types of developmental disabilities;
- a description of the housing need, including a description of the potential housing problems; and
- a discussion of resources, policies and programs including existing housing and services, for persons with developmental disabilities.

For additional information and a sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/people-with-disabilities.shtml>, and for additional information, see the area's local regional center for developmental services at <https://www.dds.ca.gov/rc/listings>.

7. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

Units At-Risk: While the element identifies the Nova Ocotillo Place that is at risk of converting from affordable to market-rate during the next 10 years, the element must also estimate the total cost of preserving these units and include a list of entities with the capacity to acquire multifamily developments at-risk. The analysis should guide policies and programs necessary to address the critical activity of preserving at-risk units. For additional information and sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml> and for more information on identifying units at-risk, see the California Housing Partnership Corporation at <http://www.chpc.net>.

### **C. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

Ongoing Programs: Numerous programs indicate an “ongoing” implementation status. While this may be appropriate for some programs, programs with quantified objectives or specific implementation actions must include completion dates resulting in beneficial impacts within the planning period. Programs needing revision include 1B4 (homelessness coordination), 1B6 (workforce housing), 2A2 (information distribution), 2A5 (self-help housing) and 3A2 (neighborhood revitalization). For

additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/program-overview.shtml>.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*




As noted in Finding B3, the element does not contain a complete sites inventory and analysis. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition:

Program 1A7 (Rezoning): The program appears to commit to rezoning to accommodate a shortfall for the 6<sup>th</sup> cycle housing element. If so, this program must be revised to:

- Permit a minimum of 16 units per site.
  - Require a minimum density of 20 units per acre.
  - Ensure at least 50 percent of identified shortfall is accommodated on residential only zoned sites, or up to 100 percent of the identified shortfall can be met on mixed-use sites if the mixed-use zoning allows both:
    - 100 percent of a development to be residential; and
    - requires a minimum of 50 percent of the square footage in a mixed-use development to be residential; and
  - Permit owner-occupied and rental multifamily residential use by-right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period.
3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*


The element must include a program(s) with specific actions and timelines to assist in the development of housing for extremely low-, very low-, low-, and moderate-income households. The program(s) could commit the City to adopting priority processing, granting fee waivers or deferrals, modifying development standards, granting concessions and incentives for housing developments that include units affordable to


lower and moderate-income households; assisting, supporting or pursuing funding applications; and outreach and coordination with affordable housing developers.

In addition, the element should include a program to update a density bonus ordinance pursuant to Government Code section 65915. 

For additional information, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/program-requirements/assist-in-development-housing.shtml>.


4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding B4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs to address and remove or mitigate any identified constraints. 

5. *The housing element shall include programs to conserve and improve the condition of the existing affordable housing stock. (Gov. Code, § 65583, subd. (c)(4).)* 

The element must include a program(s) to conserve and improve the condition of the existing stock, which may include addressing the loss of dwelling units. A program could provide grants for substantial rehabilitation, provide matching grants for homeowner improvements, or implement proactive code enforcement program.

6. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs. 

7. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (9) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs*

*identified in paragraph (9) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance. (Gov. Code, § 65583, subd. (c)(6).)*

As noted in Finding B7, the element must complete an analysis of units at risk of conversion to market rate during the planning period. The element must add or modify programs based on the outcomes of that analysis.

8. *Develop a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. (Gov. Code, § 65583, subd. (c)(7).)*

The element is required to include a program that incentivizes or promotes ADU development for very low-, low-, and moderate-income households. This can take the form of flexible zoning requirements, development standards, or processing and fee incentives that facilitate the creation of ADUs, such as reduced parking requirements, pre-approved building plans, fee waivers and more. Other strategies could include developing information packets to market ADU construction, advertising ADU development opportunities at City Hall and other locations or establishing an ADU specialist within the planning department.

#### **D. Quantified Objectives**

*Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)*

While the element provided an estimate of the number of anticipated new construction units and rehabilitation objectives by income level, it must also include conservation objectives, including preservation of units at-risk of conversion to market rate uses.

#### **E. Public Participation**

*Include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort. (Gov. Code, § 65583, subd. (c)(9).)*

While the element describes a virtual community workshop and direct notices to housing providers, the element should include additional efforts to include a broad spectrum of individuals and representative organizations, consider language access barriers and describe how comments were incorporated into the housing element. In addition, HCD understands the City did not make the element available to the public prior to submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission to HCD, the City has not yet complied with

statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in the course of its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents were circulated and how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.