

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

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Title Sole Submitter
Department Engineering Division
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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

Instructions

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.

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) 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.

i 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:

Campesinos 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 CAHUILLA 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.

i 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.

i 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%
National Origin												
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%
LEP												
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%
Sex												
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%
Age												
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%
Family Type												
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.

i 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.

V. Fair Housing Analysis > B. General Issues > Segregation/Integration

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Analysis

 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.

 Instructions 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

	(Cathedral City, CA CDBG) Jurisdiction				(Riverside-San Bernardino-Ontario, CA CBSA) Region			
Racial/Ethnic Dissimilarity Index	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).

i Instructions

i 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.

i 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% of Hispanic)	Persons of Hispanic origin	Tract
39.8	45.94	6065044904
76.97	12.22	6065940600
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
88.9	6.51	6065940900
40.04	57.52	6065044925
12	83.72	6065044907
90.62	5.62	6065941100
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:

- § 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 have 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.

i 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 > B. General Issues > Segregation/Integration > 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 > B. General Issues > R/ECAPs > 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 > B. General Issues > Disparities in Access to Opportunity

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis

V. Fair Housing Analysis > B. General Issues > Disparities in Access to Opportunity > Analysis > 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.

Table 12 - Opportunity Indicators, by Race/Ethnicity							
(Cathedral City, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
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
Population below federal poverty line							
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
(Riverside-San Bernardino-Ontario, CA CBSA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index

Total Population								
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	
Population below federal poverty line								
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 where 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?

i 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.

i 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 CA Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs	
						Proximity Index	Environmental Health Index
Total Population							
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 > B. General Issues > Disparities in Access to Opportunity > 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 > B. General Issues > Disproportionate Housing Needs

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > 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		
Households experiencing any of 4 housing problems*	# with problems	# households	% problems	with # with problems	# households	% problems
Race/Ethnicity						
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>
Household Type and Size						
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	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
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).

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.

Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden*	(Cathedral City, CA CDBG) Jurisdiction			(Riverside-San Bernardino-Ontario, CA CBSA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
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%
Total	4,720	16,955	27.84%	281,290	1,276,315	22.04%
Household Type and Size						
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?

i Instructions

i 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

	(Cathedral City, CA CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
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
76.97	12.22	6065940600
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
88.9	6.51	6065940900
40.04	57.52	6065044925
12	83.72	6065044907
90.62	5.62	6065941100
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 > B. General Issues > Disproportionate Housing Needs > 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%.

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity								
	Race/Ethnicity							
(Cathedral City, CA CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing								
Project-Based Section 8								
Other Multifamily								
HCV Program	113	43.46%	43	16.54%	104	40.00%	0	0.00%
0-30% of AMI	865	36.65%	70	2.97%	1,310	55.51%	79	3.35%
0-50% of AMI	1,500	29.35%	165	3.23%	2,685	52.54%	114	2.23%
0-80% of AMI	3,125	34.82%	210	2.34%	4,725	52.65%	227	2.53%
(Cathedral City, CA CDBG) Jurisdiction	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.

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category									
(Cathedral City, CA CDBG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	
Public Housing									
R/ECAP tracts									
Non R/ECAP tracts									
Project-based Section 8									
R/ECAP tracts									
Non R/ECAP tracts									
Other HUD Multifamily									
R/ECAP tracts									
Non R/ECAP tracts									
HCV Program									
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 too 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 > Disability and Access Analysis > Analysis

Fair Housing Analysis > Disability and Access Analysis > Analysis > 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.

Table 13 - Disability by Type				
	(Cathedral City, CA CDBG) Jurisdiction		(Riverside-San Bernardino-Ontario, CA CBSA) Region	
Disability Type	#	%	#	%
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

	(Cathedral City, CA CDBG) Jurisdiction		(Riverside-San Bernardino-Ontario, CA CBSA) Region	
Age of People with Disabilities	#	%	#	%
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

i 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 > Disability and Access Analysis > 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.

i 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.

i 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 > Disability and Access Analysis > 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.

i 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

<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>
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>

Improve the community and housing conditions of the Downtown and Dream Home Area	· Lack of private investment in specific neighborhoods · Deteriorated and abandoned properties	Disproportionate housing needs based on the “protected classes” of race, color, national origin, religion, sex, familial status, or disability.	· 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	Engineering Department
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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>

Reduce the number of fair housing complaints based on disability.	- Lack of local private fair housing outreach and enforcement - Private Discrimination	Evidence of illegal discrimination or violations of civil rights laws, regulations, or guidance.	The City will see an annual reduction of fair housing complaints based on disabilities as measured by 2016 levels.	Engineering Department IFHMB
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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 pro-fonnas 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 > 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 > Disability and Access Analysis > 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 > Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > 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.
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- 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.

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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)