



City of Lake Forest

Draft

2020-2024 Consolidated Plan

INCLUDING

- ❖ 2020-2021 ANNUAL ACTION PLAN
- ❖ 2020-2024 ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

Approved June 16, 2020

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Executive Summary

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

1. Introduction

Each year the US Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the City of Lake Forest, specifically Community Development Block Grant (CDBG) funds. To receive these funds, the City must prepare a strategic plan every three to five years called the Consolidated Plan. The purpose of the Consolidated Plan is to identify the City's housing and community development needs, priorities, goals, and strategies, and to stipulate how CDBG funds are to be allocated to housing and community development activities over the period of the Consolidated Plan, which in the case of the Lake Forest is five years.

The City's Community Development Department is the lead agency in developing the 2020–2024 Consolidated Plan (ConPlan). The Consolidated Plan identifies an array of goals and activities that the City can implement over five years to address some of the needs identified through an assessment process. The Consolidated Plan covers the period of July 1, 2020, through June 30, 2025. The Consolidated Plan is prepared utilizing HUD's *eConPlan Suite*. This online system consists of several templates, which, once completed, will be electronically submitted to HUD. The templates dictate the content of the Consolidated Plan and affords the City limited opportunities to expand narratives or modify the format. The template also includes over 50 community profiles and housing market data tables. Most tables are prepopulated with data from the U.S. Census Bureau (primarily data from the 2011–2015 American Community Survey or ACS) and data from HUD's Comprehensive Housing Affordability Strategy (CHAS). The CHAS is a special computation of housing and income data generated by the Census Bureau on behalf of HUD. The City's 2014-2021 Housing Element and other demographic data sources are used to supplement HUD-provided data.

The current planning process also includes the development of the 2020-2021 Action Plan, which is the City's annual CDBG expenditure plan. The Action Plan details the activities the City will undertake to address housing and community development needs and local objectives using CDBG funds. HUD informed the City it will receive \$513,849 in CDBG funding for Fiscal Year 2020-2021.

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

Information regarding five-year goals and outcomes is provided in the Strategic Plan section of the Consolidated Plan. A summary of these goals and outcomes is provided below:

- Infrastructure and Facility Improvements: Improve public infrastructure and facilities that benefit 7,500 low- and moderate-income residents
- Affordable Housing: Improve or expand the supply of housing affordable to 40 lower-income households

- Public Services: Provide access to public social services for 8,000 low- and moderate-income persons
- Homeless Continuum of Care: Provide access to housing and supportive services for 2,680 persons at risk of becoming homeless or that are homeless
- Economic Opportunities: Assist 50 businesses that create or preserve employment opportunities for lower-income residents
- Administration and Planning: Provide CDBG program oversight and coordination, and fair housing services to 450 households

3. Evaluation of past performance

Each year the City prepares the Consolidated Annual Performance and Evaluation Report (CAPER), which outlines how the City met the needs and objectives listed in the Consolidated Plan and Annual Action Plan. The City’s most recent 2018–2019 CAPER reports on the fourth year of the current 2015–2019 Consolidated Plan. The City’s four-year accomplishments are summarized in **Attachment 1**.

4. Summary of citizen participation process and consultation process

City staff encouraged residents and local and regional organizations to participate in the preparation of the 2020–2024 Consolidated Plan. There were several opportunities for City residents and agencies/organizations to offer input into the Consolidated Plan process, as noted below:

- The City disseminated an online Community Needs Survey to solicit the opinion of residents and business owners regarding the City's most pressing needs. The survey was available in English and Spanish.
- The City co-hosted a meeting of South Orange County public service providers to solicit input regarding the City’s social service needs.
- The City Council held a public hearing on April 21, 2020, to obtain public comments regarding the Consolidated Plan and to kick-off the 30-day public review period for the plan.
- A draft of the Consolidated Plan was made available for a 30-day public comment period from March 20 to April 20, 2020.
- The Consolidated Plan is scheduled to be adopted by the City Council on May 5, 2020, but continued to June 19, 2020 due to the Coronavirus.
- On January 9, 2020, the City participated, Orange County 202-2024 Analysis of Impediments to Fair Housing Workshop, to gather public input on fair housing issues faced by residents.

5. Summary of public comments

A summary of comments received can be found in **Attachment 2**.

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

A summary of comments received can be found in **Attachment 2**.

7. Summary

The City's Community Department has prepared the 2020-2024 Consolidated Plan, so the City will continue to receive CDBG funds directly from HUD. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. Additionally, each activity to be funded with CDBG funds must meet a national objective.

The 2020-2024 Consolidated Plan will cover the five years of FY 2020-21 through FY 2024-25. As required by HUD, the Consolidated Plan is prepared using HUD's electronic template. The template includes over 50 community profile and housing market data tables prepopulated with data from HUD.

The 2020-2021 Annual Action Plan is the first for the 2020-2024 Consolidated Plan cycle. The Annual Action Plan is the City's one-year expenditure plan for CDBG funds. The City will receive an allocation of \$531,849 in CDBG funds for FY 2020-21, and will also utilize \$72,650 in prior year and \$30,000 in program income resources during the program year. The Action Plan identifies the activities the City will undertake during a twelve-month period with CDBG funds to address community needs that support the broad objectives and goals identified in the Consolidated Plan.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	LAKE FOREST	Community Development

Table 1 – Responsible Agencies

Narrative

The City’s Community Development Department is primarily responsible for the preparation of the Consolidated Plan and the administration of CDBG funds.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The consolidated planning process requires jurisdictions to contact and consult with other public and private agencies when developing the Consolidated Plan. The plan must include a summary of the consultation process, including identification of the agencies that participated in the process. Jurisdictions also are required to summarize their efforts to enhance coordination between public and private agencies.

In coordination with other regional partners, action steps were also taken to obtain public input for the 2020-2024 Orange County Analysis of Impediments to Fair Housing (OC-AI). These actions are detailed in the draft OC-AI, a summary of which is incorporated into the Consolidated Plan as **Appendix A**.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

To enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies, the City of Lake Forest took the following actions:

- The Community Development Department, acting as the lead agency, met with various City departments and consulted with outside agencies to gain input on annual needs, enhance coordination of services, prevent duplication of services, and resolve issues within the interagency institutional structure.
- The City of Lake Forest collaborates with the County to obtain input on assisted-housing programs. Specifically, the City works with and supports the Orange County Housing Authority’s (OCHA) administration of the Housing Choice Voucher Program, which provides housing subsidies to qualified lower-income renters. Coordination is enhanced by the City’s participation as a member of the OCHA Advisory Committee.
- To strengthen the housing delivery system in the private sector, the City encourages private housing developers to include affordable units in multi-family housing developments within Lake Forest. The City will also continue to cooperate with local nonprofit housing organizations to identify and provide housing opportunities for lower-income households.
- Orange County has a broad spectrum of public and nonprofit social service providers that address the needs of the region’s residents. Through the annual CDBG public service grant funding process, City staff can ascertain the type of services City residents require (e.g., senior services, youth services, services for the near homeless and those already homeless), and develop partnerships with local agencies to ensure the delivery of quality services.

- The City of Lake Forest has an active economic development program that coordinates business activities and employment programs with community organizations such as the Lake Forest Chamber of Commerce and the Orange County One-Stop Center.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Coordination of Orange County's Continuum of Care (OC-CoC) planning process is led by 2-1-1 Orange County and the OC Community Services Department. This nonprofit-public partnership helps ensure comprehensive, regional coordination of efforts and resources to reduce the number of homeless and persons at risk of homelessness throughout Orange County. This partnership serves as the regional coordinator of the year-round CoC planning process and as a catalyst for the involvement of the public and private agencies that make-up the regional homeless system of care.

The City participates in the CoC planning process by providing information regarding the activities it will fund to address local homeless issues. This information is used by the OC-CoC to prepare the regional application to HUD for Homeless Assistance Grant funds. City staff will also expedite certifications of consistency with the Consolidated Plan and other forms of support for the OC-CoC. The City is also a supporter and participant in the biennial Point-In-Time Survey of the region's homeless.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The City is not a recipient of Emergency Solutions Grant (ESG) funds; therefore, it does not assist the OC-CoC with the determination of ESG allocations nor evaluating the outcomes, or developing policies and procedures for the administration of the regional Homeless Management Information System (HMIS).

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities (see Table 2):

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Orange County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding households receiving HUD rental assistance and regarding households on the waitlist for housing assistance
2	Agency/Group/Organization	211 Orange County
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homeless Management Information System (HMIS)
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding regional homeless, housing/service gaps for homeless, and HMIS management
3	Agency/Group/Organization	Fair Housing Council of Orange County
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Impediments to Fair Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data regarding fair housing issues in the community and input on impediments to fair housing, and assisted in developing action steps to address impediments to fair housing
4	Agency/Group/Organization	Age Well Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the housing and service needs of seniors, including home-bound seniors
5	Agency/Group/Organization	Families Forward
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the housing and service needs of homeless families and families at risk of becoming homeless
6	Agency/Group/Organization	Family Assistance Ministry
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Anti-poverty Strategy Needs of Low/Mod persons
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the housing and service needs of homeless households and households at risk of becoming homeless
7	Agency/Group/Organization	South County Outreach
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of lower income households specifically, individuals/households at risk of becoming homeless
8	Agency/Group/Organization	Vocational Visions
	Agency/Group/Organization Type	Services-Persons with Disabilities

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of adults with developmental disabilities, including developing economic opportunities for this special needs population
9	Agency/Group/Organization	Camino Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the medical/dental service needs of the community including homeless individuals
10	Agency/Group/Organization	Mercy House Transitional Living Centers
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of chronically homeless individuals
11	Agency/Group/Organization	Council on Aging – Southern California
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided information regarding the housing and service needs of elderly and disabled individuals residing in managed care facilities
12	Agency/Group/Organization	County of Orange
	Agency/Group/Organization Type	Other government - County

	What section of the Plan was addressed by Consultation?	Regional program information
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various county departments provided information regarding public health, public safety, and housing programs
13	Agency/Group/Organization	State of California
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	State program information
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various state departments provided information regarding demographics, public safety, and economics

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

The City consulted with a variety of agencies serving Lake Forest residents and the region. No agency types were explicitly excluded from the consultation process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Orange County 211	Provides regional and local point in time homeless survey data, development of the regional 10-Year Plan to End Homelessness and development of the regional Discharge Plan
5 Yr. & 1 Yr. PHA Plan	Orange County Housing Authority	Identifies OCHA resources to address the housing needs of lower income renter householders in the County and the City
City of Lake Forest 2013-2021 Housing Element	City of Lake Forest	Provides City housing priorities and program goals
Analysis of Impediments to Fair Housing	Orange County HUD Grantee Cities and the County of Orange	Countywide document that identifies fair housing impediments within participating cities and outlines a plan to address issues

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Data from the California Department of Public Health and the Orange County Health Care Agency identifies the percentage of young children with elevated lead blood levels. The City used this data to assess lead-based paint hazards. State agencies were also consulted to obtain updated housing and population information. The County of Orange was contacted to obtain an array of data, including information regarding the number of households receiving rental assistance, homeless count, and other regional data. Local governments also assisted the City with the preparation of the Consolidated Plan. As the current recipient of Housing Opportunities for Persons with AIDS (HOPWA) funds, the City of Anaheim was consulted regarding the number of Lake Forest residents living with HIV and AIDS and available HOPWA program resources. The City also participated in roundtable meetings with other Orange County CDBG recipients to discuss the preparation of a regional analysis of impediments to fair housing and other regional housing and community needs.

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The City of Lake Forest offered several opportunities for participation and comment throughout the Consolidated Plan preparation process. The City’s Citizen Participation Plan, which is presented as **Appendix 2**, outlines the City’s process to obtain public participation in the development of the Consolidated Plan, Annual Action Plan (AAP), and other facets of the CDBG Program. Action steps include a public hearing before the City Council, which also initiated the 30-day public review of the Consolidated Plan, with the final City Council adoption at a public meeting on originally scheduled for May 5, 2020 but continued to June 16, 2020 due to the COVID-19 pandemic. The notice for the City Council public hearing and a summary of public comments is provided as **Attachment 2**. Public comment and review requirements for adoption of the 2020-2024 Orange County Analysis of Impediments to Fair Housing were undertaken in conjunction with the Consolidated Plan. OC-AI public comments and related public input is provided in **Appendix 1**.

The comments received through the citizen participation process are essential to identifying priority needs, as are the results of the Community Needs survey. A summary of public input is presented in **Attachment 2**.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Community Needs Survey	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	2020-2024 Consolidated Plan Community Survey available from November to December 2019	Survey results received provided input priority housing and community needs (see Attachment 2)	All submitted surveys were accepted	No longer accessible
2	Public Meeting	Social Service Providers	The City co-hosted a public workshop on 11/6/19 to obtain input regarding community service needs from local	Meeting comments centered on the CDBG public service grant application process	All comments were accepted	NA

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			service providers - 16 individuals representing 11 organizations attended			
3	Internet Outreach	Nonprofits	Social Service Providers	The City used the internet and newspaper notice to provide information regarding funding opportunity	NA	NA
4	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	South County region OC-AI public input meeting on 1/9/20	A summary of the comments received can be found in Appendix 1	NA	NA
5	Newspaper Ad	Non-targeted/broad community	Notice of regarding the 30-day public review period (3/20/20 to 4/20/20) and 4/21/20 public hearing (Continued to 6/16/20)	A summary of comments received can be found in Attachment 2	None	NA
6	Public Meeting	Non-targeted/broad community	City Council public hearing on 6/16/20 to accept final public comments on the Consolidated Plan, AAP, and OC-AI, and authorize submission of the document to HUD	A summary of comments received can be found in Attachment 2	None	NA

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

This section of the Consolidated Plan provides a summary of Lake Forest's needs related to affordable housing, homelessness, special needs populations, and community development. Most of the data tables in this section are populated with information from the Comprehensive Housing Affordability Strategy (CHAS). The CHAS is a special tabulation of statistics developed by the Census Bureau for HUD based on the 2011–2015 American Community Survey (ACS).

The housing and community needs assessed in this section of the Consolidated Plan include the following:

- Households experiencing “housing problems” (defined below)
- The extent to which housing problems are experienced disproportionately by one or more racial or ethnic groups
- Public housing – **NOTE THE CITY OF LAKE FOREST DOES NOT OWN OR MANAGE PUBLIC HOUSING**
- An assessment of homeless needs
- Non-housing community development needs

HUD's housing needs estimates are based on an evaluation of Census data of households that are experiencing one or more “housing problems.” Per HUD, a household is experiencing a housing problem if their residential unit is subject to one or more of the following:

- Lack of a complete kitchen facility
- Lack of complete plumbing facilities
- Cost burdened: More than 30% of a household's total gross income is used for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include the mortgage payment, taxes, insurance, and utilities.
- Severely Cost Burdened: More than 50% of a household's total gross income is used for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include the mortgage payment, taxes, insurance, and utilities.
- Overcrowded: Defined as a housing unit with more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Severely Overcrowded: Defined as housing with more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

HUD data also characterizes households by types:

- Small Related: a household with two to four related members
- Large Related: a household with five or more related members
- Elderly: a household whose head, spouse, or sole member is at least 62 years of age
- Other: All other households (including one-person households)

HUD defines a “household” as, “All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.”

Finally, HUD categorizes households by income:

- Extremely low-income: A household with income equal to 0 to 30% of the Area Median Income (AMI) (also references as HUD Area Median Family Income or HAMFI)
- Very low-income: A household with income equal to 30 to 50% of the AMI
- Low-income: A household with income equal to 50 to 80% of the AMI
- Low and moderate-income or Lower-income: A household with income less than 80% of AMI
- Moderate-income: A household with an income equal to 80 to 100% of AMI

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

Summary of Housing Needs

During the past decade, Lake Forest has experienced moderate population growth. According to data presented in Table 5, the City's population grew by 3% between 2009 and 2015. A search of current data found that the California Department of Finance estimates Lake Forest's January 1, 2019, population at 86,346 an increase of 11.8% from the 2009 "Base Year" identified in Table 5. In comparison, during roughly the same period, the County's population grew 2.7, while California's population grew 6.7%. The 2013-2017 American Community Survey 5-Year Estimates indicates there are 27,965 households in the City, and the median income is \$96,963.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	77,264	79,925	3%
Households	25,755	27,045	5%
Median Income	\$91,389.00	\$91,254.00	-0%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,575	2,675	4,410	2,850	14,535
Small Family Households	995	965	2,125	1,365	8,905
Large Family Households	110	325	690	255	1,510
Household contains at least one person 62-74 years of age	378	715	885	635	2,625
Household contains at least one person age 75 or older	615	410	280	120	835
Households with one or more children 6 years old or younger	470	395	825	480	1,634

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	35	55	30	0	120	20	0	25	0	45
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	100	75	55	19	249	0	20	0	10	30
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	40	175	305	60	580	0	35	44	55	134
Housing cost burden greater than 50% of income (and none of the above problems)	1,070	540	75	10	1,695	715	650	610	170	2,145
Housing cost burden greater than 30% of income (and none of the above problems)	85	255	980	309	1,629	65	310	1,015	665	2,055
Zero/negative Income (and none of the above problems)	105	0	0	0	105	34	0	0	0	34

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,245	845	465	90	2,645	735	700	680	235	2,350
Having none of four housing problems	200	355	1,470	870	2,895	250	770	1,790	1,660	4,470
Household has negative income, but none of the other housing problems	105	0	0	0	105	34	0	0	0	34

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	710	560	555	1,825	249	220	790	1,259
Large Related	105	145	235	485	4	105	210	319
Elderly	230	119	120	469	370	480	430	1,280
Other	275	200	305	780	160	194	255	609
Total need by income	1,320	1,024	1,215	3,559	783	999	1,685	3,467

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	700	300	20	1,020	230	175	290	695
Large Related	105	70	20	195	0	75	115	190
Elderly	160	115	35	310	335	265	120	720
Other	255	200	10	465	160	155	85	400
Total need by income	1,220	685	85	1,990	725	670	610	2,005

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	130	215	240	69	654	0	15	44	55	114
Multiple, unrelated family households	4	45	120	10	179	0	44	4	8	56
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	134	260	360	79	833	0	59	48	63	170

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	NA	NA	NA	NA	NA	NA	NA	NA

Table 12 – Crowding Information – 2/2

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

Data provided by HUD’s Consolidated Plan template does not provide information for single person households in need of housing assistance; however, according to the Census Bureau (2013-2017 ACS), there are 5,875 one-person households in Lake Forest – 3,650 of these households are owners (62.1% of total one-person households), and 2,225 are renters (37.9%). According to Table 9, 609 “Other” lower-income owner households are housing cost burdened (approximately 48.8% of Other households). Comparatively, an estimated 780 “Other” lower-income renter households are housing cost burdened (56.2%). This data table indicates a sizable percentage of one-person renter households may need housing assistance.

According to information from the OCHA, 46 one-person households are presently on the waitlist for federal rental assistance. OCHA also reports that 110 one-person Lake Forest households currently receive federal rental assistance.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Disabled Households: According to the 2013-2017 ACS data, there are an estimated 5,838 Lake Forest residents with a disability – approximately 7.2% of the City’s population. Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities ..." Of residents with a disability, 559 (9.6%) are living below the poverty level. According to OCHA, 123 Lake Forest households that currently receive federal rental assistance are disabled - 36 disabled Lake Forest households are on the waitlist for federal rental assistance.

The City’s elderly population has significant levels of disabilities. The ASC estimates 26.3% of Lake Forest seniors, age 65 and over, have a disability. Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow commensurate with senior population growth. Accessibility housing needs of the disabled population, including the elderly, can typically be addressed through housing rehabilitation programs that provided improvements such as ramps, grab bars, wider doorways, and specialized kitchen cabinets.

Victims of Domestic Violence: The National Coalition Against Domestic Violence (NCADV) estimates that nationwide, domestic violence hotlines receive 20,000 calls per day. NCADV also reports that one in three women have experienced rape, physical violence, or stalking by an intimate partner in their lifetime. The State of California Department of Justice reports that in 2018, there were 272 calls for assistance related to domestic violence in Lake Forest; however, Laura’s House, a leading domestic violence service provider in South Orange County, estimates that only one in seven incidents are reported. Laura’s House also estimates that for each victim of domestic violence that receives shelter and support services, 15 to 20 individuals are turned away from lack of space. The Orange County 2019 Point In Time Survey of the region’s homeless estimates that 13.4% of unsheltered homeless in South Orange County are victims of domestic violence, and 15.4% of sheltered homeless in South Orange County are victims of domestic violence.

What are the most common housing problems?

According to HUD data from Table 7, the most common housing problems in Lake Forest is housing cost burden. This housing problem impacts both renter and owner households. To a much lesser degree, some households are affected by crowding and substandard housing (as defined by HUD).

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

Table 9 provides estimates regarding the number of lower-income households impacted by housing cost burden (30% of income toward housing cost).

- Among renter households, extremely low-income senior and low-income large related households are most impacted (49.0% and 48.5%, respectively).
- Among owner households, small and large related low-income households are most impacted (62.7% and 65.8% respectively).

Table 10 summarizes information regarding households that pay more than 50% of their income for housing. According to this HUD data, a significant percentage of lower-income households are experiencing severe housing cost burden:

- Among renter households, 68.6% of extremely low-income small renter households are dedicating more than 50% of their income for housing.
- Among owner households, extremely low-income senior households and low-income large households are impacted (46.5% and 60.5% respectively).

As indicated above, few Lake Forest households are impacted by crowded housing. According to Table 11, 1,003 households live in “crowded” housing. HUD’s data indicates that 833 of these households are renters and 170 are owners. When addressing crowding issues, the City is required to utilize the States more liberal occupancy standard, which allows up to 30 people to live in a 1,200 sq./ft. residence. The City’s Code Enforcement program staff reports that approximately 10% of their cases are related to overcrowding - the most prevalent issue related to crowding in the City is the impact of parking in residential neighborhoods.

According to Table 7, only 165 Lake Forest households are impacted by HUD-defined substandard housing. The City is required to enforce compliance with the California building code, and according to the City’s Code Enforcement staff, substandard housing is not a significant issue in the City.

Unpermitted room additions and garage conversions represent the most prevalent types of code violations addressed by City staff.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)).

The National Alliance to End Homelessness states that households at risk of homelessness are often very low-income households on a fixed income (such as retired seniors) or marginally employed. Due to limited income and high area housing costs, at risk households are typically severely housing cost burdened. Based on HUD data, 1,945 extremely low-income Lake Forest households dedicate more than 50% of household income for housing (see Table 10). This data indicates that of this figure, senior and small related households comprise 73.3% of the at-risk population.

OCHA reports that as of November 2019, there are 88 Lake Forest households on the waitlist for federal rental assistance - 31 of these households have one or more minor children. OCHA waitlist data also indicates 36 households are small, 24 are elderly households, and seven households reported they are homeless (including four households with minor children). OCHA data supports the finding that several extremely low-income families need an affordable housing solution to avoid homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

As indicated above, extremely low-income households that are experiencing severe housing cost burden are most at risk of becoming homeless. The methodology for estimating the number of households that may be at risk of homelessness is also outlined above.

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

The origins of involuntary homelessness are multi-faceted but can be grouped into two general categories: physiological and economic factors. Examples of physiological factors include physical or mental illness and addiction disorders. Economic factors include the impact of high housing and medical costs. As indicated previously, Lake Forest households with extremely low-incomes and severe housing cost burden have a high risk of becoming homeless.

Discussion

According to HUD data provided in the Consolidated Plan template, substandard and crowded housing are not a significant housing problem in Lake Forest; however, housing cost is the most prevalent housing problem. According to the National Alliance to End Homelessness, very low- income households are at a high risk of becoming homeless. Per HUD data, senior and small related households comprise over 70% of the City's extremely low-income residents that are dedicating more than 50% of their income to maintain their home.

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

Introduction

According to HUD, “A disproportionately greater need exists when the members of a racial or ethnic group at a given income level experience a housing problem at a greater rate (10% points or more) than the income level as a whole.” For example, if 60% of all low-income households within a jurisdiction have a housing problem, and 70% of low-income Hispanic households have a housing problem, low-income Hispanic households have a disproportionately greater need.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,130	300	139
White	1,080	280	99
Black / African American	35	0	0
Asian	230	25	30
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	680	0	4

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,110	560	0
White	1,220	490	0
Black / African American	70	10	0
Asian	150	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	635	20	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,140	1,265	0
White	1,760	685	0
Black / African American	29	80	0
Asian	285	265	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	30	0
Hispanic	990	200	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,295	1,555	0
White	745	905	0
Black / African American	15	79	0
Asian	220	175	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	20	0
Hispanic	254	345	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

As previously indicated, housing cost burden is the most prevalent housing problem in Lake Forest. Tables 13 through 16 show that regardless of race or ethnicity, a significant number of lower-income Lake Forest households are experiencing a housing problem; however, the data indicates that among lower-income households, Black/African American and Hispanic households are disproportionately

impacted by housing problems (i.e., cost burden). At the 80 to 100% AMI level, Asian and Native American/Native Alaskan households are disproportionately experiencing a housing problem. It is important to note that Asians are the second-largest minority population in the City (15.7% of the City's population); however, Native Americans/Native Alaskans account for 1.3% of the City's population.

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

Introduction

HUD's definition of disproportionately greater need is provided above. The HUD data below relate to households that pay more than 50% of income toward housing costs (a severe housing problem).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,980	450	139
White	975	375	99
Black / African American	35	0	0
Asian	180	75	30
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	680	0	4

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,545	1,125	0
White	880	830	0
Black / African American	70	10	0
Asian	135	44	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	445	210	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,145	3,260	0
White	495	1,960	0
Black / African American	10	105	0
Asian	104	445	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	30	0
Hispanic	500	690	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	325	2,530	0
White	165	1,490	0
Black / African American	0	94	0
Asian	60	335	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	20	0
Hispanic	74	530	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Tables 17 through 20 indicate that regardless of race or ethnicity, a significant number of extremely low-income and very low-income Lake Forest households are experiencing a severe housing problem; however, Black/African American, Asian, and Hispanic households are disproportionately impacted by severe housing problems among the different income categories. In general, at higher income levels, minority populations are not disproportionately impacted by severe housing problems.

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

Introduction:

HUD’s definition of disproportionately greater need is provided above. The HUD data below relate specifically to housing cost burden, which is the most prevalent housing problem in Lake Forest.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	16,935	5,700	4,249	150
White	11,610	3,505	2,395	99
Black / African American	350	80	80	0
Asian	2,585	665	405	30
American Indian, Alaska Native	10	15	10	0
Pacific Islander	80	0	0	0
Hispanic	2,010	1,265	1,180	14

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

UPDATED INFORMATION

RACE	TOTAL	PERCENTAGE
White	55,122	67.4%
Black or African American	1,707	2.1%
American Indian and Alaska Native	1,048	1.3%
Asian alone	12,841	15.7%
Native Hawaiian and Other Pacific Islander	132	0.2%
Some other race	7,270	8.9%
Population of two or more races:	3,692	4.5%
Total	81,812	

ETHNICITY	TOTAL	PERCENTAGE
Non-Hispanic or Latino	61,755	75.5%
Hispanic or Latino	20,057	24.5%
Total	81,812	

Source: 2013-2017 American Community Survey

Discussion:

HUD data from Table 21 indicates that most extremely low-income Lake Forest households are experiencing a housing cost burden regardless of race or ethnicity, with Pacific Islanders disproportionately impacted. At the very low-income levels, Native Americans/ Native Alaskans are disproportionately impacted by housing cost burden. At the low-income level, Pacific Islanders and Hispanics are disproportionately impacted by housing cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

According to Census data, Hispanics/Latinos is the largest minority population in Lake Forest (24.5% of the City's population). Asians represent the second largest minority population (15.7% of the City's population). Based on HUD data from the above series of tables, Black/African American and Hispanic/Latino households consistently appear to be experiencing housing problems disproportionately to the community as a whole. A notable percentage of Native Americans/ Native Alaskans and Pacific Islanders are also disproportionately impacted by housing problems, but these racial populations comprise a small percentage of the City's population.

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

As previously outlined, housing cost is the prevalent housing problem. This housing problem is found among all income categories and most race/ethnic groups. Based on HUD data and City staff input, crowded and substandard housing are not significant issues in Lake Forest.

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

In general, minority populations reside throughout the City; however, there are six Census Tracts in the City with Hispanic/Latino populations representing a third or more of the tract's residents. According to HUD data, 53.7% of residents in Tract 0320.14 are Hispanic/Latino. There are five Census Tracts with an Asian resident concentration that exceeds 15.7% (the overall percent of Lake Forest Asian residents). HUD data indicate Census Tract 0524.26 has twice the percentage of Asian residents (compared to the total percentage). It is worth noting that this tract is shared with an adjacent jurisdiction. Maps demonstrating these Census Tracts are provided as **Attachment 3 Map A** and **B**.

NA-35 Public Housing – 91.205(b)

Introduction

There is no public housing in the City of Lake Forest; however, the Orange County Housing Authority (OCHA) administers the Housing Choice Voucher Program in the City of Lake Forest. The Housing Choice Voucher Program provides rental subsidies to low-income families that spend more than 30% of the gross income on housing costs. The Voucher Program pays the difference between the excess of 30% of the recipient’s monthly income and the federally approved Fair Market Rent (FMR).

The number of vouchers administered by a housing authority fluctuates due to the availability of new vouchers from HUD and changes in housing costs. As of November 2019, OCHA administers 11,091 rental assistance vouchers throughout most of Orange County. Of this figure, 219 vouchers are leased in Lake Forest, and 88 households are on the waitlist for rental assistance. The data in the tables below represent county-wide statistics. If available, limited data that is specific to the City of Lake Forest is provided.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	10,825	0	10,418	187	207	10

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	16,476	0	16,470	17,239	15,594
Average length of stay	0	0	0	8	0	8	0	4
Average Household size	0	0	0	2	0	2	1	3
# Homeless at admission	0	0	0	87	0	5	72	10
# of Elderly Program Participants (>62)	0	0	0	4,926	0	4,884	38	3
# of Disabled Families	0	0	0	2,163	0	2,075	64	14
# of Families requesting accessibility features	0	0	0	10,825	0	10,418	187	207
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for Lake Forest households receiving rental assistance from OCHA as of November 2019.

Average Annual Income	\$18,978
Average length of stay	NA
Average Household size	2
# Homeless at admission	22
# of Elderly Program Participants (>62)	83
# of Disabled Families	123
# of Families requesting accessibility features	NA
# of HIV/AIDS program participants	NA
# of DV victims	NA

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	5,857	0	5,528	139	182	6
Black/African American	0	0	0	745	0	693	39	10	2
Asian	0	0	0	4,128	0	4,107	4	15	2
American Indian/Alaska Native	0	0	0	64	0	60	4	0	0
Pacific Islander	0	0	0	31	0	30	1	0	0
Other	0	0	0	0	0	0	0	0	0

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

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for Lake Forest households receiving rental assistance from OCHA as of November 2019.

White	169
Black/African American	31
Asian	17
American Indian/Alaska Native	1
Pacific Islander	1
Other	0

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	1,941	0	1,814	34	87	4
Not Hispanic	0	0	0	8,884	0	8,604	153	120	6
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for Lake Forest households receiving rental assistance from OCHA as of November 2019.

Hispanic	38
Not Hispanic	181

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

Not applicable. There are no public housing units in Lake Forest.

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

Not applicable.

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

Not applicable.

Discussion

There are no public housing units in Lake Forest.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homeless researchers typically use one of two methods to measure homelessness. One way attempts to count all persons that are homeless on a given day/week (point-in-time counts). The second examines the number of people who are homeless over a given period - period prevalence counts. The Orange County Continuum of Care (OC-CoC) uses the first method for its biennial enumeration of the region's homeless. To facilitate the enumeration of the homeless and the allocation of limited resources, the OC-CoC has geographically divided the County into three Service Planning Areas (SPA). Homeless data from the Point-In-Time Survey (PITS) is provided on a county-wide basis, by SPA, and to a lesser degree, by jurisdiction. Because there is limited data regarding Lake Forest's homeless population, it is generally assumed that the characteristics of the City's homeless population are similar to those of the South SPA. General demographic information regarding the South SPA's homeless population include the following:

- Gender: An estimated 36.0% of the South SPA's homeless are female, 63.8% male, and 0.1% transgender or gender non-conforming.
- Race/Ethnicity: The 2019 PITS estimates 79.1% of the South SPA's homeless are racially White, 9.5% Black/African American, 8.3% "multi-racial or other," 1.6% Asian, 1.2% Native Hawaiian/Pacific Islander, and 0.5% American Indian/Alaska Native. An estimated 27.3% are Hispanic/Latino.
- Age: The 2019 PITS estimates 21.9% of the South SPA's homeless are under the age of 18, 5.6% age 18-24, 24.9% age 25-39, 16.0% age 40-49, 21.6% age 50-61, and 10.0% age 62 and older.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	36	17				
Persons in Households with Only Children						
Persons in Households with Only Adults		59				
Chronically Homeless Individuals						
Chronically Homeless Families						
Veterans						
Unaccompanied Child						
Persons with HIV						

Table 26 - Homeless Needs Assessment

Data Source Comments: 2019 Orange County Point In Time Survey

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The OC-CoC conducted a Point-In-Time Survey of Orange County’s homeless as part of a national survey. The January 2019 PITS estimated the County’s homeless population at 6,860 individuals, with 763 in the South SPA, and 112 homeless in Lake Forest. Orange County’s homeless count includes 2,899 sheltered in emergency/transitional housing and 3,961 unsheltered homeless - 255 sheltered and 538 unsheltered in the South SPA. Lake Forest’s homeless are enumerated as 36 sheltered and 76 unsheltered.

Characteristics of the City’s homeless population is provided to the extent the PITS captured information at the city level. If no specific Lake Forest data is available, an estimate is based on the characteristics of the County’s or South SPA’s homeless population.

- Chronic Homeless Individuals: HUD defines a chronically homeless individual as an unaccompanied homeless individual (living in an emergency shelter or is unsheltered) with a disabling condition, who has been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years. The 2019 PITS estimates there are 37 sheltered and 216 unsheltered chronically homeless in South County SPA – approximately 33.2% of the subregion's homeless population. Based on this percentage, it is estimated there are 37 chronically homeless in Lake Forest. Since the PITS estimates that 85.4% of the chronic homeless in the South SPA are unsheltered, it is further estimated that 32 of these chronically homeless individuals are unsheltered.
- Chronically Homeless Families and Families with Children: The 2019 PITS identifies 53 homeless persons in “families” in Lake Forest - 36 individuals are sheltered, and 17 are unsheltered. The PITS provides no data regarding chronically homeless families; however, among unsheltered homeless individuals, approximately one-third report they become homeless for the first time in the past 12 months.
- Veterans and their Families: The County’s 2019 PITS found four veterans among Lake Forest unsheltered homeless.
- Unaccompanied Youth: The 2019 PITS did not estimate “unaccompanied children” (as requested in Table 26); however, the homeless survey estimated the number of youth households, i.e., adults between the ages of 18 and 24 – Transitional Age Youth. The 2019 PITS identified four homeless Transitional Age Youth in the City.
- HIV/AIDS: The 2019 PITS estimated that 0.8% of homeless adults in the South SPA are living with HIV/AIDS. Based on this percentage, it is likely there is one Lake Forest homeless individual is living with HIV/AIDS.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Ethnicity:	Sheltered:	Unsheltered (optional)

Data Source

Comments: See above

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

OCHA provided the City with information regarding Lake Forest households that submitted applications for rental assistance in 2012, the last time OCHA accepted applications. After a recent purge of applications, OCHA reports there are 88 Lake Forest households on the waitlist for housing assistance. Of this number, 31 are households with children, 24 are listed as senior households (age 62 and older), and 36 of applicants indicate they are disabled. Because homeless veterans are provided a priority for rental housing assistance, OCHA staff indicates there are no veteran households on the waitlist; however, OCHA reports 15 veteran households currently receive federal rental assistance. OCHA estimates it will take approximately three years to work through the existing waitlist.

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

As previously reported, the 2019 PITS estimates 79.1% of the South SPA’s homeless are racially White, 9.5% Black/African American, 8.3% “multi-racial or other,” 1.6% Asian, 1.2% Native Hawaiian/Pacific Islander, and 0.5% American Indian/Alaska Native. An estimated 27.3% are Hispanic/Latino. It is reasonable to assume Lake Forest’s homeless population mirrors the racial and ethnic composition of the South SPA.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2019 Orange County homeless survey reports there are 36 sheltered and 76 unsheltered homeless in Lake Forest.

Discussion:

The 2019 Point-In-Time survey of Orange County’s homeless estimates there are 112 homeless in Lake Forest – 36 are sheltered, and 76 are unsheltered. To a large extent, the characteristics of the homeless in Lake Forest mirrors those of the County’s South SPA homeless population, as reported in the 2019 PITS.

The 2019 homeless survey also assessed the number of homeless seniors. Survey data indicates there are four unsheltered homeless seniors in Lake Forest. According to regional service providers, homelessness among seniors is a growing issue.

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

Introduction:

HUD requires that the Consolidated Plan include a review of relevant data regarding the housing needs of persons that have special supportive housing needs, but who are not homeless. Certain segments of the population, such as elderly, disabled, victims of domestic violence, and persons with HIV/AIDS may experience conditions that make it difficult for them to access affordable housing. Physical or medical conditions, space or supportive service requirements, income, or other factors may impede a household's ability to obtain decent and affordable housing. This section briefly describes the characteristics of some of the special needs populations in Lake Forest.

Describe the characteristics of special needs populations in your community:

Special need populations are identified as the elderly, disabled, victims of domestic violence, and persons with HIV/AIDS. Characteristics are identified below.

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

- **Elderly/Frail Elderly:** According to the U.S. Census Bureau, 12.4% of Lake Forest residents are age 65 and older (2013-2017 ACS). This population is often impacted by limited mobility, increased health complications, and fixed income. Common service needs for the elderly include transportation and in-home services. Per HUD's housing needs data (Tables 9 and 10), 1,749 lower-income elderly households are experiencing housing cost burden – 1,030 are experiencing severe housing cost burden. As of November 2019, OCHA provides housing assistance to 83 senior Lake Forest households - 24 senior Lake Forest households are on OCHA's housing assistance waitlist.
- **Persons with Disabilities:** According to the 2013-2017 ACS, approximately 7.2% of Lake Forest's population has one or more disabilities. Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities..." Examples of disabilities include hearing, mobility, and visual impairments, chronic alcoholism, and mental illness. As of November 2019, OCHA provides housing assistance to 123 disabled Lake Forest households - 36 disabled Lake Forest households are on the housing assistance waitlist. The Regional Center is a nonprofit that coordinates services for individuals with developmental disabilities. They offer services ranging from housing and self-determination programs to job training and placement.
- **Victims of Domestic Violence:** Domestic violence is displayed in many forms; intimidation, physical assault, sexual assault, and other abusive behavior that is part of a pattern of control by a partner against another. Nationwide it is estimated that one in three women and one in seven men experience some form of domestic violence by an intimate partner. The California Department of Justice reports that in 2018, 272 domestic violence calls for assistance were reported in Lake Forest. For these individuals, temporary safe housing is vital. The 2019 PITS

estimates that in the South SPA, 11.3% of homeless adults are victims of domestic violence - 25% are unsheltered. Housing and support options are available for victims of domestic violence.

- Persons with HIV/AIDS: The Orange County Health Care Agency reports that as of December 31, 2018, 114 Lake Forest residents are living with HIV. Persons with HIV/AIDS face a variety of challenges, including maintaining stable housing. Safe, affordable housing may be as crucial to their general health as is access to healthcare. The 2019 PITS estimates that in the South SPA, six homeless adults have HIV/AIDS – five are unsheltered. Persons with HIV/AIDS may be targets of discrimination, including illegal eviction from their homes when their illness is exposed. Fair housing laws prohibit housing discrimination against persons with disabilities, including persons with HIV/AIDS.

Several service providers are available to help special needs populations. Safety net services allow special needs populations to save limited financial resources on items such as transportation, after-school care, and food/clothing. Additionally, fair housing enforcement and rental assistance vouchers are valuable housing resources for special needs populations. The service and housing needs of special needs populations were determined by the input of community stakeholders, government agencies, and service providers.

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

Persons with HIV/AIDS are considered a special needs group due to their need for health care and supportive services. Persons with HIV/AIDS may also face bias and misunderstanding about their illness that may affect their access to housing. Furthermore, these households may also have special needs in that they may have trouble balancing their incomes with medical expenses due to their illness, putting them at-risk of becoming homeless.

As indicated above, the Orange County Health Care Agency estimated that as of December 2018, 6,369 persons were living with HIV in Orange County – 114 in Lake Forest. Demographic data regarding the characteristics of the County’s People Living with HIV Disease (PLWHD) include the following:

- Gender: 86.7% male, 11.8% female, and 1.5% are transgender
- Race/Ethnicity: 48.3% Hispanic, 36.4% White, 7.8% Asian, and 5.5% Black
- Age: With the greatest percentage, age 46-55 (29.3%), age 56 and older (28.1%), and age 36-45 (21.5%)
- As of December 31, 2018, 49 children diagnosed with HIV before the age of 13 are living in Orange County
- The five cities with the highest number of PLWHD (in order): Santa Ana, Anaheim, Garden Grove, Orange, and Irvine

No HIV/AIDS-dedicated housing is located in Lake Forest; however, the AIDS Services Foundation has a motel program that will allow those with HIV/AIDS facing homelessness to stay in motels throughout the

region for a limited time. The following HIV/AIDS housing resources are available to residents on a countywide basis:

- Aid Services Foundation has 18 beds in its transitional housing program
- Gerry House has six beds in their six-month transitional housing recovery program with set-aside beds for those with HIV/AIDS
- Emmanuel House is a 21-bed transitional housing program
- Straight Talk, Inc. has six beds in its Start House transitional housing program

Discussion:

A percentage of the City's population has special needs that may require unique housing options and services. These special needs groups include senior and frail elderly, the disabled, victims of domestic violence, and persons with HIV/AIDS. While housing and service programs are available to these special needs populations, additional resources may be needed to address individual needs.

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

Describe the jurisdiction’s need for Public Facilities:

Based on responses to the City’s community needs survey, improving parks and recreation facilities are priorities. The City is addressing this community priority, as evident by the recent completion of a new community center and senior center, and the construction of new sports and recreation facilities. A comprehensive needs assessment of the City’s parks was recently completed, which identified improvements for the community’s parks, including new playground equipment, improvements to courts and fields, and installing/upgrading landscaping and other facilities such as restrooms.

Whenever the City contemplates improvements to public facilities, it must consider the implications of compliance with the American with Disabilities Act. Public agencies, such as the City, are required under the American with Disabilities Act of 1990 (ADA) to perform “self-evaluations” of their current facilities relative to the accessibility requirements of the ADA. Under this law, the City must have a plan to make public facilities ADA accessible. The City has developed a Transition Plan that details which public facilities do not meet current ADA requirements. Some of the improvements identified in the Transition Plan may be addressed with CDBG funding.

How were these needs determined?

2020-2024 Consolidated Plan Community Survey and city staff.

Describe the jurisdiction’s need for Public Improvements:

Top issues identified by the community in the *2020-2024 Consolidated Plan Community Survey* include water/sewer system improvements, residential street improvements, and sidewalk improvements. Water, sewer, and storm water infrastructure and services are provided by other public agencies or special districts, and may not be CDBG-eligible. Budget consideration may be given to other identified priorities such as residential streets and sidewalks improvements within CDBG-eligible areas. The City’s ADA Transition Plan also identifies numerous curb ramps that need upgrading to current ADA standards.

How were these needs determined?

2020-2024 Consolidated Plan Community Survey and city staff.

Describe the jurisdiction’s need for Public Services:

Based on responses to the *2020-2024 Consolidated Plan Community Survey*, health and youth services are identified as highly needed. Other need priorities include senior services and childcare. Among homeless services, outreach, mental/behavioral health services, homelessness prevention, and emergency shelter are ranked as the highest needs.

How were these needs determined?

2020-2024 Consolidated Plan Community Survey and consultation with local service providers.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the City's housing market, including the significant characteristics of housing supply, housing conditions, and cost. The Housing Market Analysis, in conjunction with the Needs Assessment, will provide the basis for the Strategic Plan to identify programs and projects to be funded and administered as part of the CDBG program.

Most of the data tables in this section are populated by default with data from the Comprehensive Housing Affordability Strategy (CHAS), the special tabulation of housing data produced by the Census Bureau for HUD. Additional data is derived from the American Community Survey (ACS) and other updated sources. The Market Analysis will also examine barriers to affordable housing, including impediments to fair housing choice.

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

Introduction

HUD defines a housing unit as a house, an apartment, or a single room, occupied as a separate living quarter, or if vacant, intended for occupancy as a separate living quarter. This section of the Consolidated Plan will assess the housing characteristics of the City’s housing supply, including unit type and tenure, age, condition, affordability, and availability.

Based on data from Table 27, Lake Forest’s housing stock is primarily comprised of one-unit structures (approximately 70%). Data from the State of California indicates that as of January 1, 2019, the City has a total of 30,035 housing units. Consistent with HUD’s data, the State estimates approximately 69.8% of the City’s housing stock is constructed as single-detached and attached units. According to Table 28, 70.1% of the City’s housing units are owner-occupied, and 29.9% are renter-occupied. The City also has a notable number of mobile homes.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	15,340	54%
1-unit, attached structure	4,405	16%
2-4 units	1,605	6%
5-19 units	3,995	14%
20 or more units	1,750	6%
Mobile Home, boat, RV, van, etc	1,110	4%
Total	28,205	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	35	0%	145	2%
1 bedroom	505	3%	2,430	30%
2 bedrooms	3,485	18%	3,305	41%
3 or more bedrooms	14,935	79%	2,190	27%
Total	18,960	100%	8,070	100%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

The City's 2013–2021 Housing Element identified 264 affordable housing in the City distributed within several housing developments. The affordability covenants for several of these developments have expired; however, an updated listed of assisted units is available:

- AFH Affordable Housing Condo: 1 unit for lower-income families
- SCO Transitional Housing Condo: 8 units for lower-income families
- Madrid Transitional Housing Condo: 2 units for lower-income families
- Saguaro Apartments: 3 units for lower-income families
- Arroyo at Baker Ranch: 187 units for lower-income families

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

Of the 264 affordable units listed in the 2013-2021 Housing Element, affordable housing covenants have expired on 253 units. Affordable housing covenants on eight (transitional) units will expire between 2022 and 2026.

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

The Southern California Association of Governments (SCAG) undertakes a Regional Housing Needs Assessment (RHNA) to quantify the anticipated need for housing within a five-county region. California General Plan law requires the City to have land zoned to accommodate its fair share of the regional housing need as calculated by SCAG. The goal of the RHNA is to ensure an equitable distribution of housing among jurisdictions within SCAG's region so that every community provides for a mix of housing for all economic segments. The housing allocation targets are not building requirements; instead, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period. The distribution of housing needs by income category for each jurisdiction is adjusted to avoid an overconcentration of lower-income households in any community. For the current planning period (2014 through 2021), the City's RHNA allocation is 2,727 new housing units.

According to a recent article in the *Orange County Register*, "California needs between 1.8 million and 3.5 million new homes by 2025... To get there, cities and counties would have to approve two to four times the number of homes they've been permitting in the past few years. But instead of approving more homes, almost every California city and county is falling behind its state-mandated housing goal...." ["California needs more housing, but 97% of cities and counties are failing to issue enough RHNA permits." Published December 9, 2019, *O.C. Register*.] According to this article, the City is not on track to issue sufficient housing construction permits to meet current RHNA goals. State and SCAG planners are in the process of establishing RHNA goals for jurisdictions for the next planning cycle.

These goals are yet to be finalized. Once established, the City will evaluate options to comply with applicable State requirements.

HUD data from Table 9 estimates that 7,026 lower-income Lake Forest households have a housing cost burden. Based on the current supply of housing units, there appears to be a gap of housing units affordable to many residents, especially lower-lower income households.

Describe the need for specific types of housing:

As previously outlined in the Housing Needs Assessment, housing costs in the region and specifically the City, present an issue for many households regardless of income, size, or tenure. Among lower-income households, senior and small related households appear to be experiencing housing costs challenges at a higher rate.

Discussion

The City's housing stock is comprised primarily of single units. State and regional planners have established goals for all jurisdictions to create an environment to allow for the creation of housing that is affordable to different income levels. While the City has encouraged the development of many housing units, there appears to be a need for additional units, particularly affordable to lower-income households.

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

Introduction

It is reported that the median home sales price in Orange County in December 2019 was \$840,000 – the second highest on record. [“Buyer competition fuels 16% jump in Southern California house sales.” *Orange County Register*, published January 17, 2020.] The rise in home sales prices has been driven by low interest rates and a low supply of available housing units. According to Zillow.com, in January 2020, the median home sales price in Lake Forest was \$736,702, a 40.5% increase from the 2015 median value listed in Table 29. With respect to rents, Zillow reports the median Lake Forest list rent in January 2020 was \$3,100.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	595,700	524,400	(12%)
Median Contract Rent	1,556	1,619	4%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	475	5.9%
\$500-999	405	5.0%
\$1,000-1,499	2,495	30.9%
\$1,500-1,999	3,160	39.1%
\$2,000 or more	1,535	19.0%
Total	8,070	99.9%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	265	No Data
50% HAMFI	585	705
80% HAMFI	2,895	1,563
100% HAMFI	No Data	2,683
Total	3,745	4,951

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$1,563	\$1,785	\$2,216	\$3,098	\$3,578
High HOME Rent	\$1,331	\$1,428	\$1,714	\$1,972	\$2,180
Low HOME Rent	\$1,038	\$1,113	\$1,336	\$1,543	\$1,721

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Based on HUD data tables above, it appears there is a limited supply of housing units affordable to lower income households. With a median home price of \$736,702 and a current median list rent of \$3,100, it is evident there is an insufficient supply of affordable housing for households at most income levels. The *2019-20 Community Indicators*, produced by the Orange County Business Council, concludes a minimum annual income of \$110,160 is needed to purchase an entry-level home in Orange County (estimated at \$680,000). This income requirement exceeds the average annual salary of many occupations, such as retail sales clerks, secretaries, computer programmers, elementary school teachers, and nurses. The *2019-20 Community Indicators* also finds that “To afford a median-prices one-bedroom apartment in 2019, an Orange County resident would need to make \$31.38 per hour – equivalent to an annual income of \$66,310... A minimum wage worker in Orange County would have to work 105 hours a week to afford a one-bedroom apartment, 131 hours to afford a two-bedroom unit, and 183 hours to afford a three-bedroom.” [2019-20 Orange County Community Indicators, page 54-58.]

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

The California Association of Realtors reports that current economic trends indicate a continued strong housing market in Orange County. Contributing economic indicators include low inflation, low unemployment, low-interest rates, and high consumer confidence. In response to a perceived affordable housing crisis in the State, as 2019 came to an end, the State legislature passes a series of housing bills aimed at easing the housing crisis. Measures such as AB 1482 will limit annual rent increases to 5% and requires landlords to have “just cause” when evicting a tenant. Other bills open the door for building additional housing units by right and allowing higher densities in certain transit districts. These enacted housing bills will most likely change the State, regional, and local housing market; however, both intended and unintended consequences of these bills remain to be understood.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The City of Lake Forest is not a participating jurisdiction in HUD’s HOME program; however, HUD’s current rent limits for the program are listed in Table 32. Based on a comparison of these rent levels to

rents listed on certain on-line housing services, it is evident that significant subsidies or other concessions would be necessary to create units that are affordable to lower-income households.

Discussion

Orange County remains one of the nation's most expensive housing markets. Data indicates that median home sales prices and monthly rents are out of reach of many lower-income and moderate-income households. Current economic trends also indicate housing costs will likely remain out of reach of many of the region's residents. The State of California has taken legislative action to address a growing housing shortage; however, the future impacts of this legislation are unknown.

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

Introduction

Assessing housing conditions in a City can provide the basis for developing policies and programs to maintain and preserve the quality of life. Deteriorating housing conditions depress property values and can discourage reinvestment in a community. Consequently, maintaining or improving housing conditions is often an important goal for cities.

Definitions

- Substandard Condition: A dwelling unit that contains a condition that endangers the life, limb, health, property, safety, or welfare of the public or the occupants. The conditions that make a property a substandard unit are defined in the California Health & Safety Code Section 17920.3.
- Substandard Condition but suitable for Rehabilitation: For purposes of the CDBG program, this term means that the cost of remedying all substandard conditions plus the current value of the property does not exceed the after-rehabilitation value of the property.
- Housing Problems: As defined by HUD:
 1. Lack of complete kitchen or plumbing facilities
 2. More than one person per room
 3. Cost burden greater than 30%

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,075	32%	4,000	50%
With two selected Conditions	130	1%	545	7%
With three selected Conditions	0	0%	10	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,770	67%	3,520	44%
Total	18,975	100%	8,075	101%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	300	2%	305	4%
1980-1999	9,570	50%	4,205	52%
1950-1979	9,035	48%	3,525	44%
Before 1950	70	0%	33	0%
Total	18,975	100%	8,068	100%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,105	48%	3,558	44%
Housing Units build before 1980 with children present	2,665	14%	1,715	21%

Table 35 – Risk of Lead-Based Paint

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

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	NA	NA	NA
Abandoned Vacant Units	NA	NA	NA
REO Properties	NA	NA	NA
Abandoned REO Properties	NA	NA	NA

Table 36 - Vacant Units

UPDATED INFORMATION

There are limited data sources regarding vacant units and REO properties within the City. Based on data from the State of California Department of Labor, as of January 1, 2019, the City’s housing vacancy rate is 3.7% (approximately 1,100 units). Based on information from RealtyTrac, in December 2019, 28 properties in Lake Forest were in some stage of foreclosure (default, auction, or bank-owned).

Need for Owner and Rental Rehabilitation

Housing age is also an important indicator of housing conditions. Housing that is 30–40 years old may need rehabilitation if maintenance on the home has been deferred. Data on the age of housing reported in the 2013–2021 Housing Element indicates that only about 10% of owner-occupied housing units and 11% of rented units in Lake Forest were constructed before 1970. These findings suggest that there may be a need for maintenance and rehabilitation, including remediation of lead-based paint, for only a small portion of the City’s housing stock.

Data from the Needs Assessment indicates that many lower-income homeowners are expending more than 30% of their income on housing and may not be in a financial position to undertake home repairs without incurring additional housing costs. If not for the housing rehabilitation assistance program, many low-income homeowners would be unable to complete deferred property repairs and improvements.

Table 34 indicates a considerable number of the City’s rental housing units were built before 1970. Due to the lack of public resources, and current tax laws that provide owners of rental properties with financial incentives, the expectation is rental property owners will maintain their investment to meet current housing standard conditions without public assistance.

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

For determining the number of housing units with lead-based paint, the age of the housing stock is the critical variable. Since 1978, the federal government has prohibited the use of lead-based paint on residential property; however, national studies estimated that 75% of all residential structures built before 1978 contain lead-based paint (LBP). However, not all units with LBP present a hazard. Only testing for lead in dust, soil, deteriorated paint, chewable paint surfaces, friction paint surfaces, or impact paint surfaces will provide information about hazards. Overall, these conditions are not prevalent in Lake Forest.

According to the data in Table 35, approximately 47% of the City's housing stock (12,663 units) was built before 1980 and may contain LBP. Most impacted by lead hazards are children under six years of age. HUD data estimates there are 4,380 housing units in the City with children present, that may have a lead-based paint issue. The State of California and the County of Orange Department of Public Health report that in 2018, 1.02% of 32,426 children under age six that were screened for blood lead levels (BLL), had a BLL over 4.5 micrograms of per deciliter ($\mu\text{g}/\text{dL}$). (4.5 $\mu\text{g}/\text{d}$ is the BLL level the Center for Disease Control and Prevention (CDC) considers "high"). The most recent data regarding elevated BLL for Lake Forest children less than age six is from 2012. In 2012, the CDC reports that 13 of 737 children tested had BLL greater than 4.5 $\mu\text{g}/\text{d}$. This data is not specific to lead-based paint; nonetheless, the data indicate that elevated blood lead among the City's young children is not a significant issue. Regardless, the City will take proactive action to educate parents of the developmental issues to young children associated with lead and will address lead-based paint hazards as part of its housing rehabilitation programs.

Discussion

In general, Lake Forest's housing stock is well maintained and in good to excellent condition; however, it is important to note that a significant percentage of the housing stock is over 30 years old. After 30 years, homes may begin to require substantial maintenance and even extensive rehabilitation (e.g., roof, electrical, plumbing). Additionally, some residences constructed before 1978 may have lead-based paint hazards.

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

Introduction

The City of Lake Forest does not own or operate any public housing units.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				9,925			879	1,669	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Not applicable

Public Housing Condition

Public Housing Development	Average Inspection Score
NA	NA

Table 38 - Public Housing Condition

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

Not applicable

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

Not applicable

Discussion:

The City of Lake Forest does not own or operate any public housing units.

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

Introduction

As previously discussed, the OC-CoC conducts a biennial point in time count and survey of the region’s homeless. The 2019 Point-In-Time Survey also includes an inventory of homeless shelter resources. Information presented in Table 39 identifies homeless shelter beds in Lake Forest.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	35	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The City of Lake Forest does not provide direct services for the homeless; however, it does fund nonprofit agencies that provide housing and support services for homeless Lake Forest residents. Case managers at these service agencies work closely with clients to identify appropriate mainstream services available to them and guide them through the qualification process. Examples of mainstream services include veterans housing vouchers, veteran medical services, MediCal/Medicare, SSI, and general relief.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

As indicated in Table 39, the OC-CoC identifies 35 transitional housing beds in Lake Forest. These shelter beds are reserved for homeless families.

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

Introduction

HUD requires that the Consolidated Plan describe, to the extent information is available, facilities, and services that are available assist persons who are not homeless but that have special.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

- Senior and Frail Elderly: There are several skilled nursing and residential care facilities located in Lake Forest. Based on consultation with the Council on Aging – Southern California, it has been determined that there are 993 residential care beds in 42 facilities in Lake Forest. The bulk of these facilities are six-bed facilities operating in residential neighborhoods. There are three facilities in the City with total beds ranging from 95 to 533. There are no subsidized senior housing units in the City; however, entitlements have recently been approved for the construction of 57 affordable senior housing units. Construction will be completed by January 2021.
- Group Homes/Quarters: The State reports that as of January 2019, there are 515 Lake Forest residents living in group housing. Examples of group housing included homes for the mentally disabled and physically disabled, seniors, and those recovering from substance addiction. In recent years some recovery homes have had negative impacts on residential neighborhoods. Due to current federal and state regulations, the City's ability to take specific enforcement action is limited; nonetheless, the City continues to seek different avenues to address and mitigate some of the neighborhood impacts caused by problematic operators.
- HIV/AIDS Housing: As previously outlined, there are no shelters or permanent housing units for persons with HIV/AIDS in Lake Forest.
- Public Housing Residents: There is no public housing in Lake Forest. As of November 2019, a total of 219 households in Lake Forest are receiving a rental housing voucher or certificate from OCHA.

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

The OC-CoC is responsible for developing the region's 10 Year Plan to End Homelessness. This plan will include the region's discharge plan. The discharge plan will help ensure individuals leaving institutional or medical facilities do not exit directly into homelessness. The plan will outline protocols for discharge from public facilities (such as jails) and public systems (such as the foster care system). The plan will also establish protocols to identify and assess those at-risk of homelessness and link them to needed services. Additionally, most homeless service providers involved with shelter operations are required to develop a management plan and protocols to ensure clients of respective programs receive appropriate housing and services at discharge. Furthermore, the regional CoC Coordinated Entry System will help

assess the vulnerability of persons leaving institutions and link the neediest with appropriate housing and support services.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City will continue to support various local organizations that provide services to persons with special needs. These service providers include the following:

- Age Well Senior Services: In-home case management, support service, and meals-on-wheels for homebound and frail seniors
- Alzheimer's Orange County: Daycare services for adults with Alzheimer's, other types of dementia, and physical disabilities
- Camino Health Services and Dental Clinic: Low-cost primary medical and pediatric dental services available to low-income and indigent residents
- Vocational Visions: Employment training, placement, job coaching for adults with developmental disabilities

The City will also continue to support the efforts of OCHA to obtain additional housing vouchers and certificates for disabled households. Additionally, as new housing opportunities are designed and developed, the City will work with developers to ensure accessible units are incorporated into projects as required by federal and state regulations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City does not receive HOME funds either directly as an entitlement or indirectly through a consortium.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Barriers to affordable housing exist in the form of governmental regulations and market factors. Barriers or impediments to affordable housing are caused when there is little incentive to develop affordable housing due to excessive development costs and/or the lack of community commitment. The City has little control over market factors such as the cost and availability of financing. Public policy and community issues potentially affect the cost of all development projects through the design and implementation of land use ordinances, fees, and development standards. While these policies constrain residential development to some extent, they are necessary to support other public policies. Cities also often require developers to provide on-site and off-site improvements necessary to serve their projects. The City of Lake Forest 2013–2021 Housing Element concludes that building codes and development standards in Lake Forest are not substantially different from those of most other cities in Orange County.

Land and construction costs are also key market factors that may serve as a barrier to affordable housing. The City has no influence over materials and labor costs. Land represents one of the most significant costs of new housing. The City's Housing Element points out that despite generally poor economic conditions since 2007, land prices throughout Orange County remain high relative to other regions in California and pose a significant challenge to the development of affordable housing by the private market. Because per unit land cost is directly affected by density, one way to affect this cost is to develop at higher densities that allow the cost to be spread across more units, thus reducing the total price. The City Zoning Code allows development at up to 43 units per acre in the R2 district. Another factor that may serve to address the high cost of developing affordable housing is the availability of government funding to subsidize a portion of the development cost. The elimination of California redevelopment in February 2012 directly impacted a primary funding source of the City of Lake Forest for subsidizing the cost of affordable housing.

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

Introduction

According to the data from Table 41, Lake Forest has a workforce of 43,500 individuals and an unemployment rate of 5.63%. Recent data from the California Employment Development Department show that in April 2018, the unemployment rate had decreased to 2.6%. This rate was lower than the 2.8% unemployment rate recorded for all of Orange County, and the 4.2% unemployment rate for California for the same period. The economic impacts of the Coronavirus pandemic remain unknown, however recent news reports indicate significant unemployment in most sectors of the local, state, and national labor markets. The State of California Employment Development Department reports the preliminary April 2020 unemployment rate for Lake Forest as 11.4%, up 8.2% from March 2020 – this equates to 3,600 additional unemployed Lake Forest residents in a one-month period.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobless workers %
Agriculture, Mining, Oil & Gas Extraction	257	133	1	0	0
Arts, Entertainment, Accommodations	4,435	4,093	12	11	-1
Construction	1,835	2,757	5	7	2
Education and Health Care Services	5,372	4,099	14	11	-4
Finance, Insurance, and Real Estate	3,409	3,824	9	10	1
Information	1,110	298	3	1	-2
Manufacturing	3,773	5,802	10	15	5
Other Services	1,207	1,175	3	3	0
Professional, Scientific, Management Services	5,471	5,636	15	15	0
Public Administration	0	0	0	0	0
Retail Trade	3,954	2,995	11	8	-3
Transportation and Warehousing	782	196	2	1	-2
Wholesale Trade	2,675	2,909	7	8	1
Total	34,280	33,917	--	--	--

Table 40 - Business Activity

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

Labor Force

Total Population in the Civilian Labor Force	46,105
Civilian Employed Population 16 years and over	43,500
Unemployment Rate	5.63
Unemployment Rate for Ages 16-24	13.99
Unemployment Rate for Ages 25-65	4.06

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	13,750
Farming, fisheries and forestry occupations	1,540
Service	3,865
Sales and office	11,620
Construction, extraction, maintenance and repair	2,280
Production, transportation and material moving	1,735

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	24,770	62%
30-59 Minutes	12,800	32%
60 or More Minutes	2,645	7%
Total	40,215	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,395	125	975
High school graduate (includes equivalency)	5,240	350	1,050
Some college or Associate's degree	11,705	835	2,230
Bachelor's degree or higher	17,560	560	2,705

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	30	425	645	1,010	560
9th to 12th grade, no diploma	655	380	345	690	379
High school graduate, GED, or alternative	1,525	1,485	1,650	3,520	1,960
Some college, no degree	3,300	2,640	2,130	5,925	1,905
Associate's degree	455	915	880	2,295	790
Bachelor's degree	750	3,690	3,490	7,175	1,930
Graduate or professional degree	35	1,265	2,010	3,215	1,220

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	41,550
High school graduate (includes equivalency)	61,338
Some college or Associate's degree	86,137
Bachelor's degree	126,607
Graduate or professional degree	147,362

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

According to Table 40, three major business activity sectors account for 41% of total “workers” and 37% of total “jobs.”

- Professional, Scientific, Management Services – 15% of Workers and 15% of Jobs
- Education and Health Care Services – 14% of Workers and 11% of Jobs
- Arts, Entertainment, Accommodations – 12% of Workers and 11% of Jobs

Other leading business sectors include manufacturing, retail, and finance, insurance, and real estate. This data corresponds with the profile of several of the City’s most notable corporate residents.

- Oakley - a leading optics brand design and manufacturer
- Alcon - a cutting-edge innovator in the treatment of eye diseases
- Applied Medical - innovative surgical products
- Apia Health - home respiratory services and products
- Kaiser Aluminum - aluminum fabrication for aerospace and automotive production

- Fujitsu America – retail point of sale technology
- Panasonic Avionics Corporation – in-flight entertainment and communications

Describe the workforce and infrastructure needs of the business community:

The City has established an aggressive economic development program to attract and retain employers to the community. A City webpage provides comprehensive information regarding the City’s economic development program. Infrastructure improvements to support the expansion or revitalization of business and industrial centers are incorporated into the City’s Capital Improvement Budget. In addition to improvements to roads, parkways, and storm drains, the City may explore the feasibility of installing a high-speed fiber-optic network. A fiber internet uses fiber-optic lines, which are cables made of bundled strands of glass. Each glass strand acts as a conduit for light signals that relay digital code from one end to the other at the speed of light. This technology allows for internet speeds far beyond DSL and cable because each fiber-optic line can carry multiple signals at top speeds simultaneously.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The City has a strong commitment to fostering job creation and retention for Lake Forest businesses. The City demonstrates this commitment via the Growing and Retaining Our Workforce (GROW) program. The GROW program is a partnership between the City, the Workforce Investment Board, and the Orange County One-Stop Center. GROW is a job creation and retention program that provides current and prospective Lake Forest businesses with free hiring and employee training services. Through the City’s partnership with the Orange County One-Stop Center, GROW in Lake Forest features no-cost hiring solutions and a variety of training resources. Resources include:

- Candidate screening, on-site recruitments, and job fairs
- Customized training for employees based on new technologies or procedures
- Training and hiring incentives
- Assistance with universal or confidential job recruitments
- “On-the-Job” training programs
- Assists businesses with locating available commercial space in Lake Forest to purchase or lease

Additionally, GROW in Lake Forest recognizes companies that create or add jobs as a result of their business locating or expanding in Lake Forest.

The economic impacts of the Coronavirus pandemic remain unknown, however recent news reports indicate significant unemployment in most sectors of the local, state, and national labor markets. In response, the City allocated CDBG-Coronavirus (CDBG-CV) funds authorized by the CARES Act of 2020, for a small business assistance program. A portion of regular CDBG funds may be allocated on a short-term basis to assist local businesses create or retain jobs for lower-income individuals.

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

The Orange County Business Council *2020 Orange County Workforce Indicators Report* provides a detailed overview of the region's economy. The report identifies economic changes caused by new technologies and how new technology is transforming the workforce, the local economy, and the overall business climate of Orange County. Of all the trends that may impact the workplace, the report indicates, "Artificial Intelligence (AI) has the greatest transformative potential." Furthermore, "While new technologies will likely create more jobs than it replaces in the long term, the labor market may face disruptions and widening skills gaps in the short term.... **Soft skills** will be the key to navigate this transformative period." The report loosely defines soft skills as the ability to work well in a group and demonstrate the "kind of creativity exhibited by writers and painters." Effective leadership, communication, and time management are critical soft skills. According to the Business Council report, "These skills... will likely prove to be some of the most defensible skills in an era of increasing automation ... they will survive long after many technical skills become obsolete."

The *Workforce Indicators Report* further outlines that educators can prepare tomorrow's workers by helping students focus on non-automatable skills and activities such as creative, critical thinking, and teamwork. "Education itself will have to expand into more of a lifelong process rather than just a degree or certificate. As technology and other changes continue to transform jobs, workers will need to constantly develop and refine skills in order to keep up." This workforce report provides examples of how major corporations are finding it more efficient and cost-effective to retrain workers to develop the skills necessary for the future rather than dismissing "redundant" positions and hiring new workers with the required skills.

According to HUD data, the City has a well-educated, professional workforce. Lake Forest's population seems well matched for the region's economy; however, HUD data and recent studies of the Orange County workforce also indicate that a significant percentage of the City's workforce is employed outside of the city limits. Table 43 estimates that 39% of the City's workforce commute time exceeds 30 minutes. A primary goal of the City's economic development initiatives is to create and keep jobs in the City to achieve a better housing-jobs balance and create a vibrant and diverse local economy.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

According to the 2020 Orange County Business Council's *Workforce Indicators Report*, community colleges are playing a critical role in helping Orange County businesses expand. "Community colleges are able to adapt to the needs of a rapidly changing labor market much more quickly than their four-year counterparts, making them essential to many cutting-edge industries." Furthermore, Orange County's community colleges provides students with resources and knowledge to learn skills tailored explicitly for certain careers allowing them to find jobs they are already familiar with, thus reducing the likelihood of unemployment or underemployment. Examples of "Career Education" programs offered at local

colleges include Information and Communication Technology, Process Technology, Energy Efficiency and Renewables, and Science and Medical Technology. The county's universities will continue at the vanguard of research and innovation, which fuels the region's economy.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Lake Forest will continue to implement its economic development program to expand economic opportunities for all residents. Economic development initiatives include the following:

- GROW in Lake Forest: Lake Forest's job creation and retention program described above.
- Free Business Seminars: Topic-specific seminars and workshops provide Lake Forest entrepreneurs and businesses with resources to grow and expand their business operations. The City partners with SCORE Business Counselors, Lake Forest Chamber of Commerce, Orange County-One Stop Center, Orange County Small Business Development Center, U.S. Small Business Administration, IRS, and the State Employment Development Department to deliver seminars on a variety of topics.
- Shop & Dine Lake Forest Week: A free citywide marketing program that promotes a sustainable local economy by providing all Lake Forest businesses with free advertising of their products and services. The City promotes participating businesses in a citywide coupon booklet mailed to approximately 32,000 addresses and advertised through print and radio media. The annual event has resulted in increased sales for Lake Forest businesses and assists in attracting new customers to Lake Forest shopping centers.
- Career Workshop: The City will host an event for Lake Forest job seekers that provides direct and practical advice for resume preparation and job interviews. The event takes place every other year. The next event is scheduled for FY 2021-22.
- Expedited Business Assistance Program: Staff often coordinates inter-departmental meetings with companies and their representing commercial broker at the onset of their relocation or expansion project. Staff from Economic Development, Planning, Building, and Public Works divisions will meet with the representatives to discuss the plan check and building permit review process as well as other related development issues.
- Small Business Grant Program: In response to unemployment created by stay at home and unanticipated business operations required for social distancing, a small business assistance program has been developed.

Discussion

Lake Forest will continue to support and promote local business attraction and retention, thereby fostering job creation and retention, and coordinating these efforts with job training and placement programs to provide expanded economic opportunities for its low- to moderate-income residents. In response to significant unemployment resulting from the Coronavirus CDBG funds may be allocated on a short-term basis to assist local businesses create or retain jobs for lower-income individuals.

The State of California Employment Development Department reports the preliminary April 2020 unemployment rate for Lake Forest as 11.4%, an increase of 8.2% from March 2020.

MA-50 Needs and Market Analysis Discussion

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

Based on data from the Housing Needs Assessment, housing cost burden (i.e., paying more than 30% of household income for housing) is the most prevalent housing problem in Lake Forest. For this Market Analysis discussion, a housing problem “concentration” is defined as a Census Tract with at least 50.1% of households experiencing housing cost burden. Based on an evaluation of HUD data, three Census Tracts within the City have a concentration of households with a housing cost problem (see **Attachment 3, Map C**):

- Tract 0524.24: 50.1% of residents are experiencing housing cost burden
- Tract 0320.27: 52.6% of residents are experiencing housing cost burden (this Census Tract is shared with the adjacent community).
- Tract 0524.10: 52.8% of residents are experiencing housing cost burden (this Census Tract is shared with the adjacent community).

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

Maps illustrating areas of the City with sizable minority populations are provided in **Attachment 3**. Map D of **Attachment 3** illustrates the City’s CDBG Eligible areas, which, according to HUD data, represent the Census Tract Block Groups with the highest concentration of low- and moderate-income residents in Lake Forest. A comparison of these maps indicates there is some concentration of minority populations, lower-income residents, and housing cost burden.

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

As evident from **Map A**, Census Tracts with a measurable percentage of Hispanic/Latino residents are mostly situated in the City’s southwest section. **Map D** illustrates that this section of the City also has a concentration of CDBG-eligible Block Groups. According to HUD data, these Census Tracts have a concentration of rental housing, much of which was constructed before 1980. Furthermore, as evident by **Map C**, this area of the City also has a concentration of households with a housing cost burden.

Are there any community assets in these areas/neighborhoods?

Communities within the identified Census Tracts are primarily residential. Local and regional retail and commercial businesses the residents of this area, including El Toro Road - the City’s primary commercial core. Neighborhood amenities include community parks and middle and elementary schools. Neighborhood schools support several programs that serve lower-income children with supplemental meals and after-school recreation and tutoring programs.

Are there other strategic opportunities in any of these areas?

City planners will examine current land uses within the identified Census Tracts to identify potential opportunities to develop new housing and other amenities to improve the overall quality of life for existing area residents.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Consolidated Plan regulations require the City to address internet connectivity needs in the community, especially the challenges faced by lower-income households accessing the internet. With the evolution of technological products and services such as e-commerce, online banking, and on-demand entertainment, broadband internet access has become a necessity.

BroadbandNow is a web-based organization dedicated to providing consumers with information regarding internet service providers in their area. BroadbandNow's stated mission is to help ensure broadband internet is available to all Americans. To this end, the organization has created a national database of Internet providers and the availability and cost of services.

BroadbandNow reports that 95.6% of Californians have access to wired broadband service. BroadbandNow further reports that 99.0% of Orange County residents have access to broadband internet service, and specifically, 95.9% of Lake Forest residents have access to broadband service. BroadbandNow reports there are five residential broadband providers offering service in Lake Forest. The average Lake Forest household has at least two internet companies available to them; however, approximately 2,000 residents have access to one or fewer wired internet providers available at their address.

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

The Alliance for Affordable Internet (A4AI) is an international organization that "brings together businesses, governments, and civil society actors from across the globe to develop policies needed to reduce the cost to connect and make universal, affordable internet access a reality." Research published A4AI finds that consolidated broadband markets, i.e., markets with a single broadband provider - are keeping prices high and putting life-changing internet access out of reach for hundreds of millions of people [worldwide]. While A4AI analyzes broadband service on a global scale, their research shows that competition in the broadband market can save users up to \$3.42 per GB. With five companies providing wired broadband in the City, BroadbandNow estimates that the average Lake Forest household pays \$0.83 per megabytes per second (Mbps). Comparatively, with 13 broadband providers to choose from, New York City residents pay an average of \$0.40 per Mbps.

AT&T Internet and EarthLink are Lake Forest's most widely available wired broadband options. Cox Communications is also a broadband choice in Lake Forest residents. Despite service provider options, for some lower-income residents, the cost of internet service is cost-prohibitive. For qualified low-income customers, AT&T's *Access* program offers internet connections for \$5 to \$10 per month (depending on connection speed). All installation and equipment fees are waived for eligible

households, that is any home where at least one person receives food stamps. Cox Communication's *Connect2Compete* program provides internet service for \$9.95 per month, a fraction of typical internet plans offered by Cox. Families are eligible for the program if they have at least one child in kindergarten through 12th grade who qualifies for the reduced-price school lunch program. No information regarding Earthlink programs for lower-income customers is available.

In March 2018, the Federal Communications Commission approved a proposal to expand the Lifeline program, which subsidizes telephone access for low-income Americans. The expanded program provides low-income households a \$9.25 a month subsidy for broadband internet access at home or to add a data plan to their cell phones.

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

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

The City’s current General Plan includes a Safety and Noise Element, which contains an assessment of specific natural hazards such as flooding and wildland fires.

- Flooding: There are several water streams and creeks that traverse the City. The potential for flooding in semiarid environments such as Orange County is increased due to the variation and unpredictability in the amount and intensity of rainfall. Portions of the City are subject to inundation from a 100-year flood. Development within the 100-year floodplain is prohibited in floodways unless the development will not obscure flows or increase flood levels.
- Wildland Fires: Lake Forest is subject to both wild and urban fires. The eastern portion of the City is adjacent to the Cleveland National Forest, which is considered a high fire hazard area. The regional natural vegetation is highly prone to wildfire – a hazard that can be exacerbated by prolonged drought.

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

The City’s General Plan includes a public safety plan that aims to “reduce the risk of death, injury, property damage, economic loss, and harm due to natural and manmade disasters.” Through this document, the City has developed policies to address natural hazards such as flooding and fire.

- Develop and maintain an emergency preparedness plan, which will coordinate with the regional plan. The emergency preparedness plan will direct the City’s response to emergencies stemming from various types of disasters.
- Continue to participate in the National Flood Insurance Program.
- Reduce the risk of wildland fire through fuel modification programs, especially where natural vegetation interfaces with urban development.

The City is currently updating the General Plan. The 2040 General Plan will provide updates to the City’s current planning documents, and will include policies and goals related to “Climate Change and Resiliency Planning.” The goal of this planning process is to ensure the City is “A well-prepared community where risks to life, property, the economy, and the environment resulting from climate change, including extreme weather events, are minimized.” The Climate Change and Resiliency Plan has the potential to impact all residents regardless of income.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan is the centerpiece of the City of Lake Forest's 2020–2024 Consolidated Plan. The Strategic Plan identifies the programs and projects the City will undertake or consider during the five-year Consolidated Plan cycle. In addition to identifying resources, goals, and objectives to implement housing and community development activities, the Strategic Plan has several sub-strategies, including addressing homeless issues, overcoming barriers to affordable housing, and program/project monitoring efforts.

The City's overall objective for the CDBG program mirrors the HUD's program objective: to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. To this end, the following Consolidated Plan goals have been established based on the consultation and analysis process:

- Improve or expand the supply of housing affordable to lower-income households
- Provide or improve public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
- Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
- Provide a continuum of housing and supportive services for the homeless and the near-homeless
- Provide financial assistance to create or preserve employment opportunities for lower-income residents
- Provide program administration and planning activities needed to carry out actions that address needs identified in the Consolidated Plan, including fair housing services to address local impediments to fair housing

All programs and projects are subject to the availability of CDBG funds and the City's annual budget adoption process.

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

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	CDBG Target Area
	Area Type:	Low and moderate area
	Other Target Area Description:	Low and moderate area
	HUD Approval Date:	4/1/19
	% of Low/ Mod:	52.66%
2	Area Name:	Citywide
	Area Type:	Citywide
	Other Target Area Description:	Citywide
	HUD Approval Date:	Not applicable
	% of Low/ Mod:	Not applicable

General Allocation Priorities

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

CDBG funds will be allocated on a citywide basis for activities that primarily benefit qualified low- and moderate-income households (i.e., limited-clientele activities). Other activities such as public improvements will be limited to eligible areas (see **Attachment 3 - Map D**), except for ADA related improvements, which may be carried out on a much broader basis.

The City does not receive Housing Opportunities for Persons With AIDS (HOPWA) funds.

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

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Public Improvements
	Priority Level	High
	Population	Moderate Non-housing Community Development
	Geographic Areas Affected	CDBG Target Area Citywide
	Associated Goals	Infrastructure and Facility Improvements
	Description	Installation of new or rehabilitation of existing public infrastructure and public facility improvements
	Basis for Relative Priority	Needs analysis, City department consultation, and public input
2	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Citywide
	Associated Goals	Housing Preservation
	Description	Loans, grants, and other forms of subsidies to improve or expand the City's supply of housing affordable to lower-income households
	Basis for Relative Priority	Needs analysis and public input
3	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Moderate Other – Presumed Benefit Populations
	Geographic Areas Affected	Citywide
	Associated Goals	Public Social Services
	Description	Social service programs that assistance to low- and moderate-income residents (may include fair housing services)
	Basis for Relative Priority	Needs Assessment, service providers input, and public input
4	Priority Need Name	Homeless Support Services and Housing
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children
	Geographic Areas Affected	Citywide
	Associated Goals	Homeless Continuum of Care
	Description	Housing and support services for the homeless and the near-homeless
	Basis for Relative Priority	Needs Assessment, service providers input, and public input
5	Priority Need Name	Economic Opportunities
	Priority Level	High
	Population	Moderate
	Geographic Areas Affected	Citywide
	Associated Goals	Economic opportunities for low- and moderate-income individuals
	Description	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
	Basis for Relative Priority	Response to COVID-19 pandemic

6	Priority Need Name	Administration and Planning
	Priority Level	High
	Population	Other
	Geographic Areas Affected	Citywide
	Associated Goals	Program Administration
	Description	Program oversight and coordination, including fair housing services
	Basis for Relative Priority	HUD required

Narrative (Optional)

Impediments to Fair Housing: The Fair Housing Act of 1968 requires HUD and its program participants to administer housing and urban development programs in a manner that does not discriminate directly or indirectly based on race, color, religion, sex, national origin, age, familial status, or disability. The Fair Housing Act not only prohibited discrimination in housing-related activities and transactions but also requires entities to affirmatively further fair housing. The **Analysis of Impediments (AI) to Fair Housing Choice** is the primary policy document utilized by HUD grantees for this purpose. HUD encourages jurisdictions to consult with one another and initiate metropolitan-wide planning to address impediments to fair housing choice.

During the past Consolidated Plan cycles, the City participated in the development of a multi-jurisdictional AI. For the 2020-2024 AI cycle, Lake Forest has joined with other Orange County cities and the County of Orange to develop a county-wide AI. The 2020-2024 Orange County AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, mortgage lender data, and existing housing and land use public policies. Based on an extensive analysis of this data, and the input of residents, a list of impediments to fair housing choice for the participating jurisdictions have been developed. A corresponding set of action steps to address these barriers have also been prepared. The 2020-2024 Orange County AI is incorporated into the Consolidated Plan as **Appendix 1**.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	NA – CDBG typically cannot be used for this type of activity.
TBRA for Non-Homeless Special Needs	NA – CDBG typically cannot be used for this type of activity.
New Unit Production	CDBG typically cannot be used for this type of activity; however, funds can be used for certain pre-development costs or off-site public improvements. The Needs Assessment and the Housing Market Analysis indicate there is a shortage of housing units affordable to lower-income households; however, due to the size of the City’s annual CDBG allocation, it is unlikely funds will be used for this purpose. A substantial amendment to the Consolidated Plan may be necessary if future funding is allocated for this type of activity.
Rehabilitation	Based on the data provided in the Needs Assessment and the Market Analysis, the City’s housing stock is generally in good condition; however, there is a need for rehabilitating a portion of the City’s older housing stock.
Acquisition, including preservation	According to data provided in the Needs Assessment, 1,945 extremely low-income households experience severe housing cost burden. Based on this data, the City could consider utilizing housing resources to improving the City’s older residential properties as a means of expanding housing opportunities for lower income households.

Table 48 – Influence of Market Conditions

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

Introduction

Fluctuations in annual CDBG allocations make it difficult to determine anticipated resources for a five-year period; however, based on recent allocations, the City expects to receive approximately \$500,000 annually in CDBG funding, for a five-year total of \$2,500,000. The City uses CDBG funds for housing preservation activities, public improvements, public services, and administrative costs.

HUD has notified the City it will receive \$513,849 in CDBG funds for Fiscal Year 2020-2021 (FY 2020-21). Additional resources for the year include prior year funds totaling \$72,650, and program income receive during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. Both amounts also vary from year to year. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 200 households per year. The City will continue efforts to leverage CDBG funds with other federal, state, and local funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$513,849	\$30,000	\$72,650	\$616,499	\$2,000,000	Annual CDBG allocation, prior year funds, and estimated revolving loan resources

Table 50 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City has identified other resources that may be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of November 2019, 219 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 200 Lake Forest households annually over the five-year Consolidated Plan cycle.
- The City does not have an inclusionary housing program; however, the Housing Element indicates the City will encourage developers to include a minimum of 15% affordable units within their housing projects. As an alternative, developers may pay an in-lieu fee instead of constructing affordable units within their development. The City will negotiate an agreement with a developer to ensure units are built, or the in-lieu fee is collected.

CDBG does not require matching funds.

If appropriate, describe publicly owned land or property located within the jurisdiction

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency. These assets include a 1.67-acre vacant parcel purchased from the Orange County Transportation Authority (Authority Parcel) and a tax-defaulted vacant parcel purchased from the County of Orange (Mamie Thomas Parcel). It is important to note that while the Housing Authority received these assets from the Redevelopment Agency, the Housing Authority does not have an ongoing financing mechanism to maintain the assets. The City sold the Authority Parcel in May 2017 and continues its efforts to sell the Mamie Thomas Parcel.

Discussion

Funding resources to implement the City’s Consolidated Plan are limited. The City anticipates that fluctuations in CDBG funding will continue. HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will support OCHA’s efforts to secure new rental assistance resources. As other resources (e.g., Housing Authority) become available, the City will explore opportunities to expend these funds to support the goals and objectives of the Consolidated Plan.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Orange County Housing Authority	PHA	Public Housing	Region
City of Lake Forest	Government	Economic Development Homelessness Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
County of Orange	Government	Economic Development Homelessness Non-homeless special needs Planning	Region
Orange County Continuum of Care	Regional organization	Homelessness	Region

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Lake Forest works with a wide range of public and community-based organizations to address the social service needs of the community. The institutional structure utilized to administer the CDBG program includes the following:

- The City’s Community Development Department serves as the lead agency for coordination of the Five-Year Consolidated Plan, Annual Action Plans, the Consolidated Annual Performance and Evaluation Report (CAPER), compliance review of CDBG-funded projects, and the Orange County AI.
- The City’s Public Works Department administers capital improvement (infrastructure and facility) projects, including CDBG-funded activities.
- The City contracts with the Fair Housing Council of Orange County to provide fair housing services.

- The City works in partnership with the Orange County Housing Authority to provide rental assistance to lower-income renters.
- The City works with an extensive network of local social service providers to assist the homeless, households at risk of homelessness, special needs populations, and lower-income residents.
- The City’s economic development plan engages the local business community and employers to expand business opportunities in the City, which, in turn, generates employment opportunities for residents at all income levels.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance			
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services		X	
Supportive Services			
Alcohol & Drug Abuse			
Child Care	X		
Education			
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling			
Transportation			
Other			
Other			

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Service providers are available to assist Lake Forest residents that are at risk of becoming homeless and that are homeless. Based on the idea that it is less expensive and disruptive to keep a household housed in place, the primary focus of the City's homeless strategy is to support the provision of safety net services for community residents. These services include assessment and case management, supplemental food, limited financial assistance for rent or utilities, and reduced cost childcare and medical services. Safety net services enable households at risk of homelessness to redirect limited income toward maintaining their housing.

For those who are homeless, the City has established relationships with housing and service providers that accept referrals from the City. These agencies can address the immediate, interim, and long-term housing needs of the homeless, and provide critical support services.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

As indicated above, the City has developed a strong relationship with local nonprofit agencies that provide a variety of services to residents, including individuals with special needs and the homeless. The main weakness in the City's service delivery system stems from limited financial resources. Additional issues include service and facility gaps in the continuum of care and service overlap.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Orange County Continuum of Care has designed and implemented a Coordinated Entry System (CES) for people experiencing homelessness or that are at risk of homelessness. The objective of the CES is to more effectively and efficiently help people who are homeless to secure housing and, consequently, achieve a measurable reduction in regional homelessness. As part of this effort, the OC-CoC has adopted a policy of shifting investment away from transitional housing and investing in permanent supportive housing and rapid re-housing. To the extent resources are available, the City supports the efforts of the OC-CoC to use limited resources as effectively as possible.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure and Facility Improvements	2020	2024	Non-Housing Community Development	CDBG Target Areas Citywide	Public Improvements	CDBG: \$625,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7,500 Persons Assisted
2	Housing Preservation	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$1,000,000	Homeowner Housing Rehabilitated: 40 Household Housing Unit
3	Public Social Services	2020	2024	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$200,000	Public service activities other than Low/Moderate Income Housing Benefit: 8,000 Persons Assisted
4	Homeless Continuum of Care	2020	2024	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$175,000	Public service activities other than Low/Moderate Income Housing Benefit: 2,500 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Homeless Person Overnight Shelter: 30 Persons Assisted Homelessness Prevention: 250 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Economic Opportunities	2021	2024	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$100,000	Businesses assisted: 50 Businesses Assisted
6	Program Administration	2020	2024	Administration	City wide	Administration and Planning	CDBG: \$516,499	Other: 450 Other

Table 49 – Goals Summary

Goal Descriptions

1	Goal Name	Infrastructure and Facility Improvements
	Goal Description	Improve and expand public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
2	Goal Name	Housing Preservation
	Goal Description	Improve or expand the supply of housing affordable to lower-income households
3	Goal Name	Public Social Services
	Goal Description	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
4	Goal Name	Homeless Continuum of Care
	Goal Description	A continuum of housing and supportive services for the homeless and the near-homeless

5	Goal Name	Economic Opportunities
	Goal Description	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
6	Goal Name	Program Administration
	Goal Description	Provide administration and planning activities to carry out actions that address identified needs in the Consolidated Plan, including fair housing services to address local impediments to fair housing

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City is not a participating jurisdiction in the HOME program.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The City of Lake Forest does not own or operate public housing units.

Activities to Increase Resident Involvements

Not applicable

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

Not applicable

Plan to remove the ‘troubled’ designation

Not applicable

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

Barriers to Affordable Housing

Barriers to affordable housing exist in the form of governmental regulations and market factors. Barriers or impediments to affordable housing are caused when there is little incentive to develop affordable housing due to excessive development costs and/or the lack of community commitment. The City has little control over market factors such as the cost and availability of financing. Public policy and community issues potentially affect the cost of all development projects through the design and implementation of land use ordinances, fees, and development standards. While these policies constrain residential development to some extent, they are necessary to support other public policies. Cities also often require developers to provide on-site and off-site improvements necessary to serve their projects. The City of Lake Forest 2013–2021 Housing Element concludes that building codes and development standards in Lake Forest are not substantially different from those of most other cities in Orange County.

Land and construction costs are also key market factors that may serve as a barrier to affordable housing. The City has no influence over materials and labor costs. Land represents one of the most significant costs of new housing. The City’s Housing Element points out that despite generally poor economic conditions since 2007, land prices throughout Orange County remain high relative to other regions in California and pose a significant challenge to the development of affordable housing by the private market. Because per unit land cost is directly affected by density, one way to affect this cost is to develop at higher densities that allow the cost to be spread across more units, thus reducing the total price. The City Zoning Code allows development at up to 43 units per acre in the R2 district. Another factor that may serve to address the high cost of developing affordable housing is the availability of government funding to subsidize a portion of the development cost. The elimination of California redevelopment in February 2012 directly impacted a primary funding source of the City of Lake Forest for subsidizing the cost of affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Affordable housing development faces several challenges, including the cost of construction, financing, and development regulations. The 2013–2021 Housing Element notes that the City can encourage and facilitate affordable housing through financial assistance, removal of regulatory constraints, and administrative support. It offers the following actions to promote affordable housing production with limited available funding.

- The City will monitor new neighborhood developments for compliance with development agreements that include an Affordable Housing Implementation Plan.
- The City will collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of State density bonus provisions.

- Work with developers on a case-by-case basis to provide State-mandated regulatory concessions and incentives to assist with the development of affordable and senior housing. State-mandated regulatory concessions and incentives could include but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.
- If available, provide financial subsidies to help reduce the cost of development in exchange for the reservation of units for lower-income households.

SP-60 Homelessness Strategy – 91.215(d)

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

The City collaborates with nonprofit partners to conduct homeless outreach in the community. Service providers will evaluate the service and housing needs of individuals to facilitate the transition to permanent housing and independent living. Local service providers tie into the regional Coordinated Entry System established by the OC-CoC, which determines the vulnerability of homeless individuals and prioritizes access to housing and services for those most at risk. This need-assessment system is designed to “facilitate exits from homelessness to stable housing in the most rapid manner given available resources.” Homeless outreach service providers such as Mercy House also work closely with the Orange County Sheriff’s Department Homeless Outreach Team. The former helps coordinate services with the Orange County Health Care Agency, homeless advocacy groups, and other nonprofits to offer resources and services to the homeless and chronic homeless.

Addressing the emergency and transitional housing needs of homeless persons

As Table 39 indicates, there are 35 transitional shelter beds located in the City. These shelter beds are the result of past City allocations of CDBG and redevelopment funds to nonprofits to assist with the acquisition of housing units. These units continue to provide much needed interim housing opportunities for homeless families with children. The City will continue to support local nonprofit agencies that provide emergency and transitional housing for the region’s homeless. The City supports agencies such as Family Assistance Ministries (FAM), Families Forward, and South County Outreach. FAM offers a continuum of housing, including emergency and transitional housing for families with children. Families Forward and South County Outreach offer interim housing programs for homeless families that have been stabilized and are transitioning into independent living. Additionally, the City will participate in regional efforts to explore options and opportunities to develop a South SPA year-round emergency shelter and homeless resources center.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

According to current HUD directives, the OC-CoC has established a coordinated entry system whereby a homeless individual or family seeking shelter and services is directed to a streamlined system that facilitates access to appropriate housing and services. The system screens applicants for eligibility for services, such as homelessness prevention, emergency shelter, rapid rehousing, permanent supportive housing, and other interventions. The needs and strengths of each household are assessed to determine which interventions will be most effective and appropriate, while also prioritizing people for assistance

based on the severity of their needs. Homeless service providers presently supported by the City will be critical players in housing and servicing the City's homeless population via the coordinated entry system.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

As indicated previously, the City homeless strategy is rooted in the proposition that it is less expensive and disruptive for a household to remain sheltered in their existing home than to be rehoused. To this end, the City uses public resources, such as CDBG, to support agencies that provide a variety of safety net services that may help prevent households from becoming homeless. Examples of safety net services include food banks, rent/utility assistance, and subsidized childcare services. The City will also participate in regional homeless planning efforts, including the OC-CoC's Discharge Plan, which will aim to prevent individuals that are leaving institutions such as jails, prisons, and hospitals from becoming homeless.

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

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

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 (Title X) changed the federal approach to addressing LBP by increasing the emphasis on the prevention of childhood lead poisoning through housing-based strategies.

Lake Forest has implemented its lead-based paint reduction strategy as part of the City's Housing Rehabilitation programs. All application packets for the City's Housing Rehabilitation programs include a notice to educate residents about the health dangers of lead and encourages screening of children for elevated blood lead levels. Additionally, before using federal funds to improve a property, a unit must be screened for lead-based paint. If lead-based paint is identified, the hazards must be addressed per federal requirements. The use of lead-based paint is prohibited in newly constructed units.

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

The City will continue to act as necessary to reduce lead-based paint hazards per HUD regulations. As outlined above, housing units improved via the City's housing rehabilitation programs are tested for lead-based paint, and the hazard is removed as necessary to comply with federal regulations.

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

The City will comply with lead-based requirements as part of the administration of the CDBG program. The City's Housing Rehabilitation programs' policies and procedures aim to reduce the risk of lead-based paint poisoning, especially among young children.

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

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

According to the U.S. Census Bureau, 7.4% of the City's population is living below the poverty level. The Census Bureau also reports that 7.4% of Lake Forest residents age 65 and older live in poverty, as are 9.3% of children age 18 years and younger. ^[1]

The City has identified several activities and services it can implement to help combat poverty:

- Support rental assistance programs provided by OCHA for very low-income renters, especially for senior and disabled households, and households with children.
- Continue to support homeless prevention services for individuals presently housed but are at risk of losing their residence.
- Assist those already homeless in need of emergency shelter, transitional housing, rapid rehousing, or permanent supportive housing.
- Support public services that provide a social safety net for lower-income individuals.
- Continue to implement housing rehabilitation programs for lower-income homeowners, especially senior households.
- Assist agencies that provide employment training for low- and moderate-income residents.
- Support programs that aid the anti-poverty strategy, such as CalWorks and the Orange County Workforce Investment Board.

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

The activities delineated above are tied directly to the goals and objectives of the City's Consolidated Plan. Safety net services can provide households living in poverty with extra resources that may allow them to maintain or improve their overall financial situation. Furthermore, expanding or preserving the City's supply of affordable housing will provide new housing opportunities to lower-income households at affordable prices, which is consistent with the housing goals of the Consolidated Plan.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Lake Forest Community Development Department has the responsibility for overall program monitoring and compliance. Staff monitors all CDBG funded agencies and City departments to ensure compliance with applicable regulations and to ensure timely implementation of all activities. The program staff conducts an on-site monitoring visit of each subrecipient biennially. The City also ensures compliance with all Federal and City contracting regulations, including procurement, Federal Labor Standards, equal opportunity (Minority Business Enterprise and Women Business Enterprise), and Section 3. While construction projects are underway, on-site compliance interviews with the workers are conducted. Additionally, the program Staff ensures compliance with the U.S. Office of Management and Budget (OMB) requirements for conducting single audits, as well as compliance with HUD reporting requirements for accomplishment in the Integrated Disbursement and Information System (IDIS).

The City of Lake Forest will continue to reach out to small businesses and minority and women-owned businesses when conducting procurements for supplies, equipment, construction, and services for CDBG-funded activities.

2020-2021 Annual Action Plan

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

Introduction

Fluctuations in annual CDBG allocations make it difficult to determine anticipated resources for a five-year period; however, based on recent allocations, the City expects to receive approximately \$500,000 annually in CDBG funding, for a five-year total of \$2,500,000. The City uses CDBG funds for housing preservation activities, public improvements, public services, and administrative costs.

HUD has notified the City it will receive \$513,849 in CDBG funds for Fiscal Year 2020-2021 (FY 2020-21). Additional resources for the year include prior year funds totaling \$72,650, and program income received during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. Both amounts also vary from year to year. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 200 households per year. The City will continue efforts to leverage CDBG funds with other federal, state, and local funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$513,849	\$30,000	\$72,650	\$616,499	\$2,000,000	Annual CDBG allocation, prior year funds, and estimated revolving loan resources

Table 54 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City has identified other resources that may be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of November 2019, 219 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 200 Lake Forest households annually over the five-year Consolidated Plan cycle.
- The City does not have an inclusionary housing program; however, the Housing Element indicates the City will encourage developers to include a minimum of 15% affordable units within their housing projects. As an alternative, developers may pay an in-lieu fee instead of constructing affordable units within their development. The City will negotiate an agreement with a developer to ensure units are built, or the in-lieu fee is collected.

CDBG does not require matching funds.

If appropriate, describe publicly owned land or property located within the jurisdiction

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency. These assets include a 1.67-acre vacant parcel purchased from the Orange County Transportation Authority (Authority Parcel) and a tax-defaulted vacant parcel purchased from the County of Orange (Mamie Thomas Parcel). It is important to note that while the Housing Authority received these assets from the Redevelopment Agency, the Housing Authority does not have an ongoing financing mechanism to maintain the assets. The City sold the Authority Parcel in May 2017 and continues its efforts to sell the Mamie Thomas Parcel.

Discussion

Funding resources to implement the City’s Consolidated Plan are limited. The City anticipates that fluctuations in CDBG funding will continue. HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will support OCHA’s efforts to secure new rental assistance resources. As other resources (e.g., Housing Authority) become available, the City will explore opportunities to expend these funds to support the goals and objectives of the Consolidated Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Preservation	2020	2021	Affordable Housing	Citywide	Affordable Housing	CDBG: \$180,000	Homeowner Housing Rehabilitated: 8 Household Housing Unit
2	Public Social Services	2020	2021	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$65,500	Public service activities other than Low/Moderate Income Housing Benefit: 1,873 Persons Assisted
3	Homeless Continuum of Care	2020	2021	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$168,300	Public service activities other than Low/Moderate Income Housing Benefit: 2,125 Persons Assisted Homeless Person Overnight Shelter: 25 Persons Assisted Homelessness Prevention: 225 Persons Assisted
4	Economic Opportunities	2020	2021	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$100,000	Businesses assisted: 80 Businesses Assisted

5	Program Administration	2020	2021	Administration	Citywide	Administration and Planning	CDBG: \$102,699	Other: 74 Other
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Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Preservation
	Goal Description	Loans and grants to improve owner-occupied housing or expand the supply of housing affordable to lower-income households
2	Goal Name	Public Social Services
	Goal Description	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
3	Goal Name	Homeless Continuum of Care
	Goal Description	A continuum of supportive and housing services for the homeless and households at risk of homelessness
4	Goal Name	Economic Opportunities
	Goal Description	Grants and other forms of assistance to create or expand for employment opportunities for lower-income individuals
5	Goal Name	CDBG Program Administration
	Goal Description	CDBG program oversight and coordination including fair housing services

Projects

AP-35 Projects – 91.220(d)

Introduction

The activities to be undertaken during FY 2020-21 are summarized below. All activities identified are expected to be completed by June 30, 2021.

Projects

#	Project Name
1	CDBG Program Administration
2	Fair Housing Council
3	Housing Rehabilitation
4	Age Well Senior Services
5	Alzheimer’s Orange County
6	Camino Health Center
7	Families Forward
8	Family Assistance Ministries
19	South County Outreach
10	Vocational Visions
11	Small Business Grant Program

Table 50 – Project Information

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

The City recognizes that special needs populations (i.e., seniors, disabled, and households with extremely low-income) are more likely to become homeless because they have limited income or other issues that require supportive housing or services; therefore, the City considers supportive services a high priority.

The City anticipates that the greatest obstacle to meeting the underserved needs of these special needs populations will be a lack of financial resources for both supportive services and housing. A common need reported by service providers is affordable housing. Increasing rents, and reductions to the Housing Choice Voucher Program and other housing programs, can impact the City's ability to support affordable housing opportunities for extremely low- and very low-income households.

The CARES Act of 2020 waived the CDBG program 15% cap for public service grant expenditures. This waiver provides the City a unique one-time opportunity to support programs that respond to the impacts of the Coronavirus. The City is allocating approximately 38% of available CDBG funds for safety net services such as expanded senior services, healthcare, and fair housing counseling. Additionally, funding for foodbanks and housing/utility assistance will be made available to households that are financially impacted by stay-at-home orders.

AP-38 Project Summary

Project Summary Information

Table 57 – Project Summary

1	Project Name	CDBG Administration
	Target Area	Citywide
	Goals Supported	CDBG Program Administration
	Needs Addressed	Program Administration
	Funding	CDBG: \$102,699
	Description	CDBG program oversight and coordination
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	Citywide
	Planned Activities	CDBG program oversight and coordination, including public service grant management, preparation of reports, and IDIS management
2	Project Name	Fair Housing Council of OC
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$6,000
	Description	Fair housing services

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	73 households (228 Individuals)
	Location Description	Citywide
	Planned Activities	Fair housing outreach, education, and enforcement services
3	Project Name	Housing Rehabilitation
	Target Area	Citywide
	Goals Supported	Housing Preservation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$180,000
	Description	Housing rehabilitation loans and grants for owner-occupied housing units (plus program income received during the year)
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	8 low- and moderate-income households
	Location Description	Citywide
	Planned Activities	Loans and grants to rehabilitate owner-occupied housing units
4	Project Name	Age Well Senior Services
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services

	Funding	CDBG: \$7,500
	Description	In-home support services for home-bound seniors
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	36 Seniors and frail elderly
	Location Description	Citywide
	Planned Activities	Case management and in-home support services for home-bound seniors and frail elderly
5	Project Name	Alzheimer's Orange County
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$10,000
	Description	Adult daycare services
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	25 seniors and disabled adults
	Location Description	Citywide
	Planned Activities	Adult daycare and ancillary services for seniors and adults with Alzheimer's, other forms of dementia, and disabilities
6	Project Name	Camino Health Center
	Target Area	Citywide

	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$30,000
	Description	Low-cost medical and pediatric dental services
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	1,550 Individuals
	Location Description	22481 Aspen St. Lake Forest, CA
	Planned Activities	Reduced cost medical and pediatric dental services for low- and moderate-income persons
7	Project Name	Families Forward
	Target Area	Citywide
	Goals Supported	Homeless Continuum of Care
	Needs Addressed	Homeless Support Services and Housing
	Funding	CDBG: \$56,100
	Description	Transitional housing, support services, and case management for homeless families
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	25 homeless persons with transitional housing
	Location Description	Citywide
	Planned Activities	Case management and transitional housing for homeless families
	Project Name	Family Assistance Ministry

8	Target Area	Citywide
	Goals Supported	Homeless Continuum of Care
	Needs Addressed	Homeless Support Services and Housing
	Funding	CDBG: \$56,100
	Description	Rental assistance to help prevent eviction/homelessness
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	250 lower-income individuals at risk of becoming homeless (75 with rent/utility assistance and 175 with case management)
	Location Description	Citywide
	Planned Activities	Case management and rental assistance to help lower-income households from becoming homeless
9	Project Name	South County Outreach
	Target Area	Citywide
	Goals Supported	Homeless Continuum of Care
	Needs Addressed	Homeless Support Services and Housing
	Funding	CDBG: \$56,100
	Description	Foodbank and case management services for individuals at risk of homelessness and homeless individuals
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2,100 low- and moderate-income persons (1,950 food bank and 150 with rent/utility assistance)

	Location Description	7 Whatney St. B, Irvine CA
	Planned Activities	Foodbank services, including case management. Services also include emergency rent and utility assistance to prevent eviction or termination of services
10	Project Name	Vocational Visions
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$12,000
	Description	Job training and development services for adults with disabilities
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	34 adults with developmental disabilities
	Location Description	26041 Pala, Mission Viejo CA
	Planned Activities	Job training and job development services for adults with developmental disabilities
11	Project Name	Small Business Grant Program
	Target Area	Citywide
	Goals Supported	Economic Opportunities
	Needs Addressed	Economic Development
	Funding	CDBG: \$100,000
	Description	Grant assistance to create or expand employment opportunities for lower-income individuals
	Target Date	6/30/21

Estimate the number and type of families that will benefit from the proposed activities	80 Businesses
Location Description	Citywide
Planned Activities	Grants for small businesses to receive reimbursement for a portion of their utility expenses and reimbursement for costs related to the purchase of personal protective equipment, supplies, and minor retrofits to protect staff and the general public

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

For FY 2020-21, CDBG funds will support activities on a citywide basis, that is, for households that are income-eligible or eligible due to a unique characteristic (e.g., adults with disabilities and seniors) regardless of where they live in Lake Forest.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Areas	0
Citywide	100

Table 51 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City does not allocate CDBG funds on a geographic basis; instead, funding is allocated in a manner that best meets the needs of lower income households regardless of where they reside in the City. The City prioritizes the use of its CDBG funding for the preservation of housing that is affordable to lower-income households (via rehabilitation), and that helps prevent homelessness or assist those already homeless. These activities are carried out on a citywide basis.

CDBG-funded infrastructure and facility improvements are usually located within Low- and Moderate-Income areas as identified by HUD (see **Attachment 3 Map D**). Some infrastructure/facility improvement projects may be undertaken in areas outside of Low- and Moderate-Income areas. Such projects are typically limited to those that address ADA regulations.

Discussion

CDBG funds will fund programs that serve lower-income Lake Forest residents regardless of where they live. For FY 2020-21, CDBG funds will benefit residents on a citywide basis.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Although the Consolidated Plan and Action Plan focus on affordable housing needs of the community, the City's only HUD funding source is CDBG. HUD regulations prohibit the use of CDBG for the construction of new housing; however, the City will allocate funds to preserve existing housing that is affordable to lower-income homeowners.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	8
Special-Needs	0
Total	8

Table 52 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	8

Table 60 - One Year Goals for Affordable Housing by Support Type

Discussion

The 2020-2021 Action Plan allocates CDBG public to a local agency that will provide transitional housing to an estimated 11 individual. The City's CDBG-funded affordable housing strategy is to maintain the affordable housing stock through housing rehabilitation programs and supporting rental assistance programs like the Housing Choice Voucher (administered by the OCHA). The City anticipates eight homeowners will participate in the City's housing rehabilitation program, and 200 Lake Forest renter households will receive rental assistance during FY 2020-21.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Lake Forest does not own or operate public housing.

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

Not applicable

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

Not applicable

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

Not applicable

Discussion

The City of Lake Forest does not own or operate public housing.

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

Introduction

The City recognizes the importance of assisting the homeless and near-homeless with a continuum of care approach that not only addresses a homeless person's immediate shelter needs, but also provides access to transitional and permanent housing, support services, and employment opportunities to break the cycle of homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

The City collaborates and relies on nonprofit partners to reach out to homeless persons (especially unsheltered persons). The City will allocate CDBG funds to four agencies that will provide services for homeless individuals. Each agency has an outreach component used to engage and assess clients. Mercy House will receive CDBG funding in support of its street outreach and engagement program. Funds are available to provide motel and transportation vouchers to homeless individuals engaged by the Mercy House Street Outreach Team and the OC Sheriff.

Addressing the emergency shelter and transitional housing needs of homeless persons

In past years, the City used CDBG funds to assist nonprofits in acquiring eight condominium units located in the community to provide transitional housing. For FY 2020-21, Families Forward's "Housing Program" is recommended for CDBG funding. This program offers interim (i.e., transitional) housing for up to 25 individuals (i.e., families with children). The City did not receive any requests for emergency shelter programs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Orange County Continuum of Care coordinates a system that incorporates several evidence-based practices, including a Housing First approach that involves moving persons directly from the streets into permanent housing accompanied by home-based supportive services. This approach has been effective with chronically homeless persons and families.

In past years Lake Forest used CDBG and local redevelopment funding to expand permanent housing opportunities for the formerly homeless. In 2015, the City's Housing Authority (former redevelopment

agency) sold a four-unit apartment to Families Forward. These units provide permanent housing opportunities for lower-income households, including formerly homeless families.

In addition to Rapid Rehousing, the OC-CoC will address the housing needs of homeless households with unique situations. The Family Redirection Program aims to keep homeless families with children off the streets by prioritizing shelter and housing resources for families. HUD has also significantly increased the number of rental assistance vouchers for homeless Veterans (i.e., Veterans Affairs Supportive Housing or VASH vouchers). In addition to receiving rental assistance, veterans with a history of severe mental health illness, substance use disorder, or physical disabilities receive case management and appropriate support services from the Department of Veterans Affairs. Currently, 486 VASH vouchers are in place throughout Orange County (13 in Lake Forest). For unaccompanied youth, there are several residential/supportive services programs available in Orange County designed specifically for youths. Services offered include crisis intervention, drug abuse counseling, and case management.

The City will not allocate FY 2020-21 CDBG funds for rapid rehousing or permanent supportive housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

For FY 2020-21, the City will allocate CDBG funds to Family Assistance Ministry and South County Outreach for an array of services to assist the near-homeless and those already homeless. These agencies operate food bank programs, which provide an entry point into the regional CoC. Program applicants undergo an assessment by case managers who determine if additional services are needed and who will make appropriate referrals. CDBG resources are used by these agencies to assist households who are at risk of eviction or the termination of utilities due to financial hardships, especially in the post-COVID-19 environment. The City will also continue to participate in regional homeless planning efforts, including the OC CoC's Discharge Plan, which aims to prevent individuals from leaving institutions such as jails and hospitals, from becoming homeless.

Discussion

The programs identified above to address the needs of homeless persons indicate that serving the homeless is a complex issue requiring a network of service providers. The City will allocate CDBG resources to support a network of agencies that will address the needs of the community's homeless and those at risk of becoming homeless.

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

Introduction:

The Strategic Plan provides detailed information regarding barriers to affordable housing and actions to overcome these barriers. The efforts to address these barriers during FY 2020-21 are summarized below.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Affordable housing development faces several challenges, including the cost of construction, financing, and development regulations. The 2013–2021 Housing Element notes that the City can encourage and facilitate affordable housing through financial assistance, removal of regulatory constraints, and administrative support. It offers the following actions to promote affordable housing production with limited available funding.

- The City will monitor new neighborhood developments for compliance with development agreements that include an Affordable Housing Implementation Plan.
- The City will collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of State density bonus provisions.
- Work with developers on a case-by-case basis to provide State-mandated regulatory concessions and incentives to assist with the development of affordable and senior housing. State-mandated regulatory concessions and incentives could include but are not limited to, density bonuses, parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards.
- If available, provide financial subsidies to help reduce the cost of development in exchange for the reservation of units for lower-income households.

Discussion:

The Strategic Plan includes an extensive narrative regarding barriers to affordable housing and actions the City can take to mitigate identified obstacles to the development of affordable housing. As outlined above, the City provides an expedited development review process for affordable housing projects to help reduce holding costs and the overall cost of development. The City has little control over market forces such as the cost of land, building materials, and labor. If resources are available, the City may provide gap financing to help reduce overall development costs as an incentive to develop affordable housing. There are no growth limit initiatives in Lake Forest.

AP-85 Other Actions – 91.220(k)

Introduction:

There are several constraints to meeting the needs of low-income residents; the primary obstacle is a lack of funding to address all needs adequately. Demand for services has forced many nonprofits to reduce services at a time when governmental entities are also decreasing resources. In response to the level of need, the City has maintained its commitment to utilize and leverage resources efficiently and effectively to meet priority community needs.

Actions planned to address obstacles to meeting underserved needs

The City recognizes that special needs populations face challenges due to low income, the unique conditions that they face, and that they are more likely to become homeless as a result of these factors. Special needs populations often require unique housing and supportive services. The City considers supportive services and housing for special needs populations as a high priority. In FY 2020-21, the City will fund public service agencies that assist underserved populations such as the homeless, seniors, the disabled, and low-income families with children.

Actions planned to foster and maintain affordable housing

The City's strategies related to CDBG-funded affordable housing efforts are focused on maintaining the housing stock through its housing rehabilitation programs, supporting rental assistance programs like the Housing Choice Voucher, and helping to ensure individuals have access to housing free of discrimination due to race, gender, disability, and other personal or household characteristics.

Actions planned to reduce lead-based paint hazards

As previously discussed, the Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 changed the federal strategy to addressing LBP by increasing the emphasis on the prevention of childhood lead poisoning through housing-based approaches. For example, lead-based paint hazard reduction as an eligible activity in the City's housing rehabilitation programs.

All application packets for the City's housing rehabilitation programs include a notice to educate residents about the health dangers of lead and encourage screening of children for elevated blood-lead levels. Additionally, before the use of federal funds, housing units are screened for lead-based paint. Housing units identified with lead-based paint hazards are treated, so the lead-based paint is abated per current federal requirements. The use of lead-based paint is prohibited in newly constructed units.

Actions planned to reduce the number of poverty-level families

The City will leverage limited CDBG funds to address the needs of poverty-level families by partnering with nonprofit agencies that primarily focus services to these households. Specifically, the City will fund programs that provide safety net services such as food banks, limited financial assistance to prevent eviction, low-cost medical and dental care, and fair housing education/enforcement services.

Actions planned to develop institutional structure

The City of Lake Forest will continue efforts to eliminate institutional gaps and enhance coordination of programs with all segments of the community. For example, the City will partner with nonprofit entities to deliver public services. City departments will continue to work together to evaluate programs and projects that may be funded in whole or in part with CDBG funds that address priority needs. The City will assist OCHA by participating in the Cities Advisory Committee – a quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and general housing issues. As a member of the OC-CoC Community Forum, the City will continue to provide information to the regional CoC as it prepares the County’s annual Continuum of Care Homeless Assistance grant application. The City will also continue to participate in the development of the County’s Ten-Year Plan to end chronic homelessness and the regional discharge plan.

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

The City will continue to participate in regional coordination of services by participating in the Cities Advisory Committee - the quarterly meeting of cities and OCHA to discuss issues related to federal rental housing assistance and as a member of the OC-Co C Community Forum. On an annual basis, the City meets with service providers to discuss service needs and ways to improve service to residents. Another example of enhanced coordination is the preparation of the county-wide Analysis of Impediments to Fair Housing. The City participated in the development of this document, which required significant jurisdictional coordination.

Discussion:

As previously outlined, HUD regulations require that the City prepare an Analysis of Impediments to Fair Housing choice (AI) every five years. In addition to identifying impediments, the AI includes a strategy to overcome barriers and action steps to implement on an annual basis. The City reports AI accomplishments in the annual year-end report. The City of Lake Forest joined other Orange County jurisdictions to fund the preparation of a county-wide AI. The AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, mortgage lender data, and existing housing and land use public policies. Based on an analysis of this data, plus the input of residents, a list of impediments to fair housing choice for the County has been developed. A corresponding set of action steps to address these barriers has also been prepared. A summary of the of 2020-2024 Orange County AI is incorporated into the Consolidated Plan as **Appendix A** – the entire AI is available for review on the City’s website. The specific action steps the City will take during FY 2021-21 to address impediments to fair housing can also be found in **Appendix A**.

Program Specific Requirements

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

Introduction:

The program-specific requirements that apply to the City are those for the CDBG program.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	100,000
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.5%

Discussion

The City will meet the 70% low- and moderate-income Overall Benefit requirement for the use of CDBG funds over three years – Program Years 2020, 2021 and 2022. Approximately 19.5% of available CDBG funds (minus administration), may be used for Urgent Need activities.

Attachments and Appendices

Five-Year and One-Year Summary of Accomplishments

Grantee Name: City of Lake Forest

Decent Housing							
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed	
Provide housing rehabilitation grants to assist senior, disabled and/or Low/Mod income homeowners improve primary residence.	CDBG	2015	Housing Units	11	17	154.5%	
		2016	Housing Units	11	16	145.45%	
		2017	Housing Units	12	17	141.67%	
		2018	Housing Units	14	17	121.43%	
		2019	Housing Units				
		5-Yr Con Plan Goal			55	67	121.82%
Support OC Housing Authority's efforts to provide Housing Choice Vouchers to lower income households.	HUD Housing Vouchers	2015	Housing Units	175	184	105.14%	
		2016	Housing Units	240	179	74.58%	
		2017	Housing Units	190	214	112.63%	
		2018	Housing Units	210	187	89.05%	
		2019	Housing Units				
		5-Yr Con Plan Goal			875	764	87.31%
Suitable Living Environment							
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed	
Provide financial support to public & nonprofit organizations that provide direct services to seniors & frail elderly . Services will help individuals maintain independent living or ensure services that improve quality of life.	CDBG	2015	Individuals	29	20	68.97%	
		2016	Individuals	16	18	112.50%	
		2017	Individuals	16	23	143.75%	
		2018	Individuals	41	39	95.12%	
		2019	Individuals				
		5-Yr Con Plan Goal			200	100	50.00%
Provide financial support to public & nonprofit organizations that provide direct services to disabled & developmentally disabled . Services will help clients maintain independent living situation or ensure service that improves quality of life.	CDBG	2015	Individuals	12	21	175.00%	
		2016	Individuals	42	19	45.24%	
		2017	Individuals	38	34	89.47%	
		2018	Individuals	38	54	142.11%	
		2019	Individuals				
		5-Yr Con Plan Goal			100	128	128.00%

Provide financial support to public & nonprofit agencies that <u>assist lower youths</u> . Supported agencies should provide households with access to programs & services at reduced or no cost.	CDBG	2015	Individuals	37	14	37.84%
		2016	Individuals	12	17	141.67%
		2017	Individuals	16	45	281.25%
		2018	Individuals	10	7	70.00%
		2019	Individuals			
		5-Yr Con Plan Goal				150
Financial support for public & nonprofit agencies that provide <u>services for lower income individuals</u> . Supported agencies should provide access to programs & services at reduced or no cost.	CDBG	2015	Individuals	2,772	3,709	133.80%
		2016	Individuals	4,025	3,973	98.71%
		2017	Individuals	2,834	3,146	111.01%
		2018	Individuals	2,819	4,622	163.96%
		2019	Individuals			
		5-Yr Con Plan Goal				15,000
Financial assistance for CDBG-eligible projects that improve or upgrade the City's <u>infrastructure or facilities</u> & address a community priority. Improvements may include repair/replace residential street, sidewalks, ADA compliance & related improvements.	CDBG	2015	Projects	1,233	1,233	100.00%
		2016	Projects	500	792	158.40%
		2017	Projects *	864	0	0.00%
		2018	Projects	5,890	533	9.05%
		2019	Projects			
		5-Yr Con Plan Goal				5,000
Economic Opportunity						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
No 5-year goals for CDBG-funded economic development were established in the Consolidated Plan; however, CDBG funds have been allocated to public service programs that have expanded economic opportunities for low-income persons disabled adults	NA	2015	Individuals			
		2016	Individuals			
		2017	Individuals			
		2018	Individuals			
		2019	Individuals			
		5-Yr Con Plan Goal				0
Continuum of Care						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Support service providers that assist households <u>at risk of becoming homeless</u> . Services include short-term financial subsidy to prevent eviction &/or utility termination and support services.	CDBG	2015	Individuals	0	0	0.00%
		2016	Individuals	0	0	0.00%
		2017	Individuals	25	23	92.00%
		2018	Individuals	17	20	117.65%
		2019	Individuals			
		5-Yr Con Plan Goal				25

Other (O-1)						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
CDBG program oversight, coordination and administration .	CDBG	2015	Year of Admin	1	1	100.00%
		2016	Year of Admin	1	1	100.00%
		2017	Year of Admin	1	1	100.00%
		2018	Year of Admin	1	1	100.00%
		2019	Year of Admin			
	5-Yr Con Plan Goal			5	4	80.00%
Implement action plan to address impediments to fair housing including financial support for fair housing education, training & referral services & enforcement of fair housing laws & prosecute fair housing law violators.	CDBG	2015	Households	200	90	45.00%
		2016	Households	48	65	135.42%
		2017	Households	185	258	139.46%
		2018	Households	70	77	110.00%
		2019	Households			
	5-Yr Con Plan Goal			400	490	122.50%

* Project (ADA Ramps Phase 11) underway at end of FY 17-18 report period.

SUMMARY OF PUBLIC COMMENTS

30-DAY PUBLIC REVIEW COMMENT PERIOD (MARCH 20, 2020 THROUGH APRIL 20, 2020)

No public comments were received during the public comment period.

MAY 5, 2020 CITY COUNCIL HEARING (CONTINUED TO JUNE 16, 2020)

No public comments were received during the public hearing.

Saddleback Valley News

2190 S. Towne Centre Place Suite 100
Anaheim, CA 92806
714-796-2209

PROOF OF PUBLICATION

Legal No. **0011374199**

5190701

LAKE FOREST, CITY OF
25550 COMMERCECENTRE DR STE 100
ATTN: SUE REES
LAKE FOREST, CA 92630

: NO. PN 20-24 CON PLAN 20-21 AAP AND O

AFFIDAVIT OF PUBLICATION

STATE OF CALIFORNIA, }
County of Orange } **SS.**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the Saddleback Valley News, a newspaper that has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, on December 7, 1976, Case No. A-86742 in and for the South Orange County Judicial District, County of Orange, State of California; that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

03/26/2020

I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct:

Executed at Anaheim, Orange County, California, on Date: March 26, 2020.



Signature

**PUBLIC NOTICE
CITY OF LAKE FOREST
Community Development Block Grant Program
2020-2024 Consolidated Plan, 2020-2021 Annual Action Plan
and 2020-2024 Orange County Analysis of Impediments to Fair Housing
30-DAY PUBLIC REVIEW AND COMMENT PERIOD
AND NOTICE OF PUBLIC HEARING**

Notice is hereby given that the City of Lake Forest is seeking public input pursuant to the Community Development Block Grant (CDBG) program 2020-2024 Consolidated Plan – including the Annual Action Plan for Fiscal Year (FY) 2020-21, and the 2020-2024 Orange County Analysis of Impediments to Fair Housing (Orange County-AI). The primary objective of the CDBG program is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for persons of low- and moderate-income (those earning 80 percent or less of Orange County's median income). This funding is provided by the U.S. Department of Housing and Urban Development (HUD). The scope of eligible activities established by HUD ranges from public works improvements to housing rehabilitation and social service programs.

The Consolidated Plan is a 5-year strategic plan that identifies priority community needs, and projects/programs that may be implemented to meet these needs. The Annual Action Plan outlines the City's proposed use of CDBG funds for a twelve-month period. HUD has notified the City it will receive \$513,849 in CDBG funds from HUD for FY 2020-21. Prior year funds and program income will also be available to undertake eligible activities. Based on the estimated amount of funds to be available, the following activities will be undertaken:

Program Name	Program Description	Estimate of Proposed Funding
Public Services	Food distribution, health care services, senior services, and homeless services	\$77,000
Public Services	Sidewalk and intersection ADA improvements	\$166,799
Housing Rehabilitation	Loans and grants to assist homeowners improve residence	\$280,000
CDBG Program Administration	Program coordination, management, staffing, monitoring and reporting; fair housing education and enforcement services	\$102,700

The 2020-2024 Orange County AI identifies potential fair housing impediments to the access of housing throughout Orange County and in Lake Forest.

COMMENT PERIOD

Copies of the draft 2020-2024 Consolidated Plan (including the 2020-21 Annual Action Plan), and the 2020-2024 Orange County AI are available for review at the following locations in Lake Forest from 3/20/20 through 4/20/20: 1) Lake Forest City Hall at 100 Civic Center Drive; 2) El Toro Library at 24672 Raymond Way; 3) Foothill Ranch Library at 27002 Cabriole, and on the City-website here: <http://www.lakeforestca.gov/854/Community-Development-Block-Grant>.

Written comments should be submitted no later than noon April 20, 2020 to rsantos@lakeforestca.gov:

City of Lake Forest
Attn: Ron Santos, Senior Planner
Attn: Ron Santos, Senior Planner
Lake Forest, CA 92630

All written comments received by the City will be responded to in writing.

CITY COUNCIL PUBLIC HEARING

DATE: Tuesday, April 21, 2020
TIME: 6:30 PM, or soon thereafter
LOCATION: Lake Forest City Hall Council Chambers
100 Civic Center, Lake Forest, CA, 92630

All interested persons are invited to attend the public hearing and to present their views on the draft Consolidated Plan, the allocation of 2020-2021 CDBG funds, and the 2020-2024 Orange County AI. It is requested that any supportive documents and/or written responses be submitted prior to this public hearing. Written comments will be accepted prior to noon, April 20, 2020, at the address above.

Any petition for judicial review of a decision of the Lake Forest City Council is controlled by the statute of limitations provisions set forth in Sec. 2.50.010 and 2.50.020 of the LFMC and Sections 1094.5 and 1094.6 of the California Code of Civil Procedures. Any action or proceeding to attack, review, set aside, or void any decision of the Lake Forest City Council shall be limited to those issues raised at the hearing as provided in Sec. 2.50.010 and Sec. 2.50.020 of the LFMC. If you wish to challenge in court an action taken by the City Council, the challenge will be limited only to those issues you or someone else raised at the public hearing or in written correspondence delivered to the City Clerk at, or prior to, the public hearing described in this notice, and must be commenced within the time limits specified in Chapter 2.50 of the LFMC.

For further information, please contact Ron Santos, Senior Planner, City of Lake Forest, at (949) 461-3449 or via e-mail at rsantos@lakeforestca.gov.

/s/Maria Huizar, CMC
City Clerk

Published: The Saddleback Valley News, March 26, 2020

11374199



Constant Contact Survey Results

Survey Name: 2020-2024 Consolidated Plan - Community Survey

Response Status: Partial & Completed

*First, tell us a little about yourself: Are you are Lake Forest

Answer	0%	100%	Number of Response(s)	Response Ratio
Resident			79	97.5 %
Business owner			3	3.7 %
Other			1	1.2 %
Totals			81	100%

TextBlock:

Please indicate the importance of each community need on the following questions:

*Social and Public Services

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Senior Services						80	3.2
Youth Services						80	3.5
Childcare Services						80	3.3
Services for the Disabled						80	3.2
Services for Victims of Domestic Violence						80	3.2
Services for Abused & Neglected Children						80	3.5
Substance Abuse Services						80	3.3
Healthcare Services						80	3.2
Screening for Lead Poisoning						80	2.3
Mental Health Services						80	3.9

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

*Social and Public Services (Continued)

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Transportation Services						80	3.2
Graffiti Removal						80	3.0
Employment Training						80	2.7
Food Banks						80	3.0

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

*Homeless Services

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Homeless Outreach Services						80	4.1
Emergency Shelter (1 to 90 Days)						80	3.8
Transitional Housing (Over 90 Days)						80	3.7
Permanent Housing						80	3.3
Homeless Prevention (One-time Rent/Utilities Assistance)						80	3.8
Food & Clothing						80	3.2
Mental & Behavioral Health						80	4.1
Substance Abuse Programs						80	3.8
Storage Facilities						80	2.6

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

*Housing Supply/Improvements

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Housing for Large Families (5 or more person households)						80	2.6
Housing for Small Families (1- or 2-person households)						80	2.8
Housing for Seniors (Age 62 and older)						80	3.1
Housing for Persons with Special Needs (HIV/AIDS, Substance Abuse, Disabled)						80	2.9
Homebuyer Assistance						80	2.9
Rehab: Owner-Occupied Residential						80	2.7
Rehab: Renter-Occupied Residential						80	2.5
Rehab: Energy Efficiency Improvements						80	2.8
Acquisition (for Affordable Housing)						80	3.1

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

*Community Facilities

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Senior Centers						80	2.9
Youth Centers						80	3.4
Centers for the Disabled						80	3.2
Health Facilities						80	3.1
Parks and Recreation Facilities						80	3.4
Neighborhood or Community Centers						80	3.2
Rehab: Publicly Owned Buildings						80	2.8

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

*Public Infrastructure

1 = No Need, 2 = Low Need, 3 = Moderate Need, 4 = High Need, 5 = Critical Need

Answer	1	2	3	4	5	Number of Response(s)	Rating Score*
Residential Street Improvements						80	3.2
Sidewalks/Gutters						80	3.0
Street Lighting						80	3.2
Flood Prevention/Drainage						80	3.2
Sewer System Improvements						80	3.0
Water System Improvements						80	3.3
Tree Planting						80	3.1
ADA-Compliant Public Improvements						80	2.8

*The Rating Score is the weighted average calculated by dividing the sum of all weighted ratings by the number of total responses.

Please share any additional comments, concerns or suggestions here:

17 Response(s)

TextBlock:

Every effort will be made to reasonably accommodate individuals with disabilities by making survey material available in alternative formats.

Requests for assistance should be made to the Community Development Department at (949) 461-3449 or by visiting the Community Development Department at 100 Civic Center Drive, Lake Forest, CA 92630.

Constant Contact Survey Results

Survey Name: 2020-2024 Consolidated Plan - Community Survey

Response Status: Partial & Completed

1. First, tell us a little about yourself: Are you are Lake Forest - Other responses

Answer	Respondent
Daughter goes to school in LF	Anonymous

2. Social and Public Services - Comments

Answer	Respondent
[No Responses]	

3. Social and Public Services (Continued) - Comments

Answer	Respondent
I think the need for affordable childcare services is important as a lot of low income family don't have the money to afford quality childcare that will elevate their children's development experience which will break the cycle. Meanwhile, the parents have more options to get better jobs and even decide to get more education to elevate themselves in the workforce.	Anonymous

4. Homeless Services - Comments

Answer	Respondent
This information is best obtained by a professional survey of homeless needs - asking the homeless themselves and reporting in the context of documented research on the subject.	Anonymous
House the homeless. Look at what Salt Lake City does. Housing first.	
Homelessness is increasing in the city and I think one way to alleviate some of the current issues and future issues is to offer temporary housing and help to get them jobs and get the medical attention they need.	Anonymous
I would like to see this issue get the attention it deserves before it becomes a larger problem.	Anonymous
Our town is going downhill in part due to the homeless being allowed to make a home wherever they wish.	Anonymous
Showers, laundry, and other hygiene facilities as in tremendous need.	Anonymous
The more service you provide for homelessness the more homeless you get in the community.	Anonymous

5. Housing Supply/Improvements - Comments

Answer	Respondent
More high density housing and public housing.	Anonymous
We continue to need low wage positions to keep the economy and businesses going, but yet we don't have any homes that these workers can afford near their place of work. We need to make affordable housing more accessible to break the cycle of poverty as well as homelessness.	Anonymous
I personally make decent money but I have given up hope of ever owning a decent home. The down payments are ridiculous and it would be nice to have programs of some kind for people in our level to get a house, not a shoebox condo, and not have to give up our entire nest egg.	Anonymous
There are way too many houses in Lake Forest! The name of our city means we need more trees & cleaner water.	Anonymous
No more houses!!	Anonymous

6. Community Facilities - Comments

Answer	Respondent
We need more gathering places to bring the generations together. Activities should not only be focused on a specific age demographic, but make them intergenerational. There are studies that show that there are a lot of benefits to each demographic to befriend others outside of their age demographic and social economic groups to create more sympathetic community.	Anonymous
We need more study spaces for students! The library is inadequate for high school and college students, too small and noisy with no power outlets and poor wifi connection. Look at Newport Beach public library, Huntington Beach, and mission Viejo libraries for ideas.	Anonymous
- I am glad Hoag will be coming in with a health center! - I still do not understand why Lake Forest decided to put in a huge sports park and not include a pool. Every other city around us has some sort of public swimming facility, and we do not. It is great that some of the HOAs have pools, but there are many other residents of this city that do not have a local pool to visit. It would bring other people, income, and prestige to Lake Forest with swimming and water polo events.	Anonymous

Our neighborhood parks have been severely neglected by the city for years and are a danger to our youth. The park renovations need to happen before another generation of Lake Forest youth become adults. Our residents currently commute to Mission Viejo and Irvine to visit parks because Lake Forest neglects the needs of our youth. We are better than this!	Anonymous
Desperate need for more wilderness parks to recreate. There have been a ton of new houses, but zero new wilderness parks. All of the wilderness space is simply being sold to build more houses (just look near Whiting Ranch Park). have you seen how crowded the parks are on a weekend? it's nuts...	Anonymous
We already have great youth & Senior centers	Anonymous

7. Public Infrastructure - Comments

Answer	Respondent
Would love to see more trees planted in neighborhoods	Anonymous
Sidewalks and gutters are very different :-)	Anonymous
Let's make sure people can get around conveniently and safely on foot and bike. Sidewalks ought to be wide and have crosswalks in all directions at intersections. We could use more pedestrian paths and separated cycleways. Lake Forest has made a great start on non-motorized mobility and I would like to see it expand.	
The public infrastructure in Lake Forest is in fairly good condition.	Anonymous
Fix raised sidewalks that increase risks of injury and lawsuits. Add lighting to dark streets and parks so illegal activities are less attractive	Anonymous

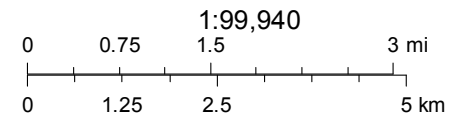
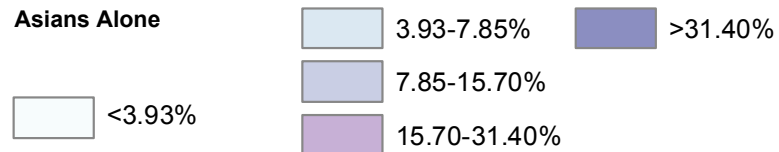
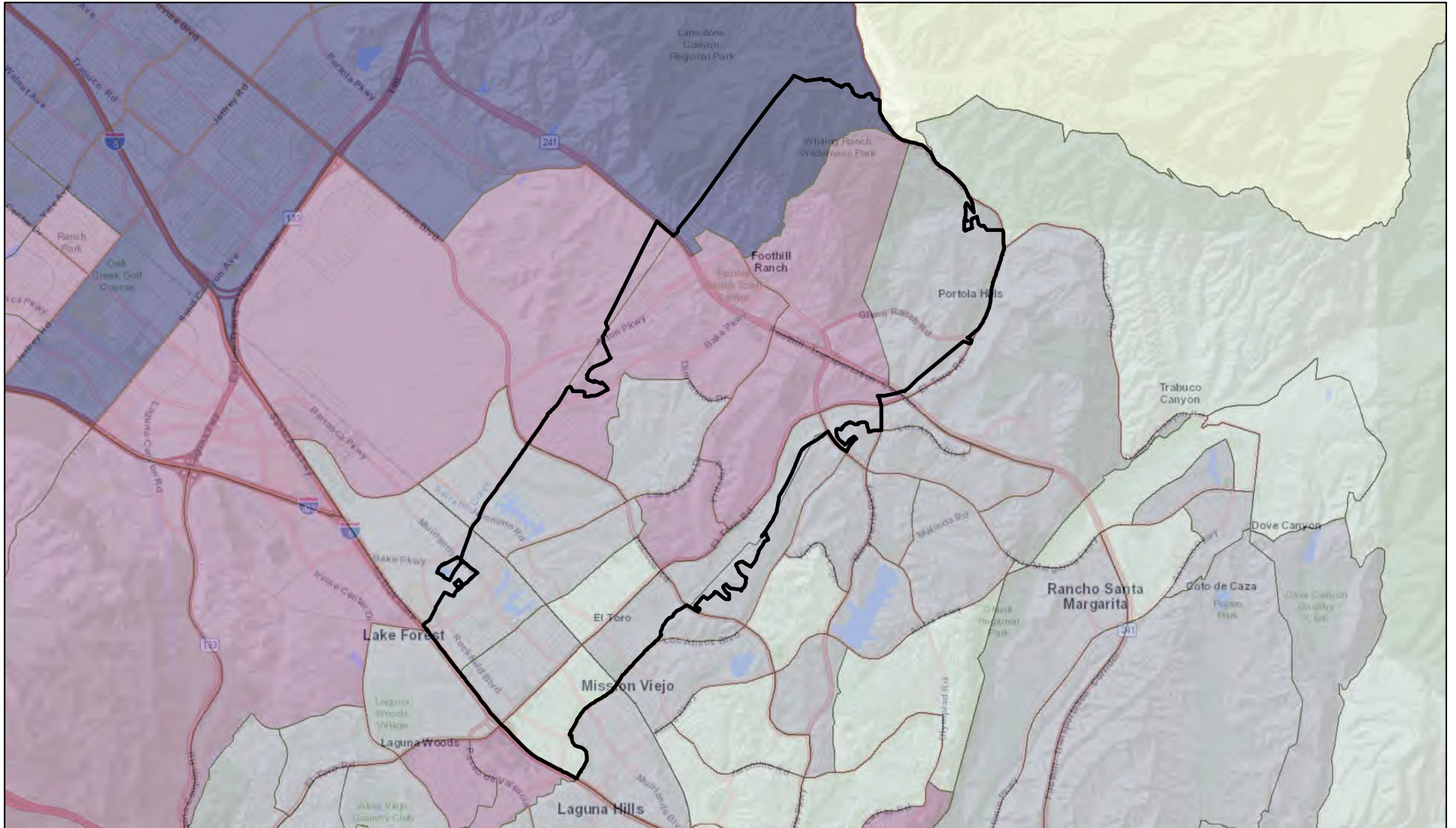
8. Please share any additional comments, concerns or suggestions here: - Responses

Answer	Respondent
Would love to see the look of the older neighborhoods improve with designed landscaping and parking enforcement	Anonymous
Lake Forest trolley daytime transportation for its residents. Reduced or no cost with proof of Lake Forest residency. Free to senior residents transport to medical offices, shopping centers, etc.	Anonymous
Community pool would be a great addition	Anonymous

The city needs to do a better job of creating volunteer opportunities for residents to give back to the community by helping with projects that can make a difference in solving homelessness issues, beautifying a community, or even just to help families in need. Volunteerism is an easy way for people to bond and be more sympathetic.	Anonymous
Thank you for taking the time to find out about our opinions!	Anonymous
It would be so helpful if the city were a bit more friendly toward the disabled. Transportation is much needed as well and not just to be shuttled to appointments. In an ideal world the city would make transportation accessible to all locations. Even to social events as persons with disabilities come in many forms any many hold jobs.	Anonymous
Please focus on the homeless encampments	Anonymous
We need more money towards the maintenance of existing parks. Cherry Park is often littered with trash that small children pick up. A restroom would be nice to have at Cherry Park. We need more SHADE in parks. They become unusable in the summer without sufficient shade	Anonymous
Stop taking money from home builders and stop giving handouts to homeless. Enforce the laws and pass new ones to discourage panhandling, loitering and encampments!	Anonymous
We need a junior high in the Foothill Ranch area. If SVUSD won't build one maybe someone could build a private school for us.	Anonymous
Homeless people and victims of domestic abuse need a place to go to get back on their feet. Abused women need childcare so they can work and become financially independent.	Anonymous
Animal rescues.	Anonymous
Stop allowing more and more houses to be built. It's becoming so overcrowded my friends and I have all begun to talk about moving!!!	Anonymous
Addressed as current needs our city has	Anonymous
Prioritize our youth!	Anonymous
Please consider opening some more wilderness space to recreate - not just a sports park. Too many new houses and new residents with zero new wilderness parks. Whiting Ranch is the only place close by and it's so crowded on a weekend it's disgusting.	Anonymous

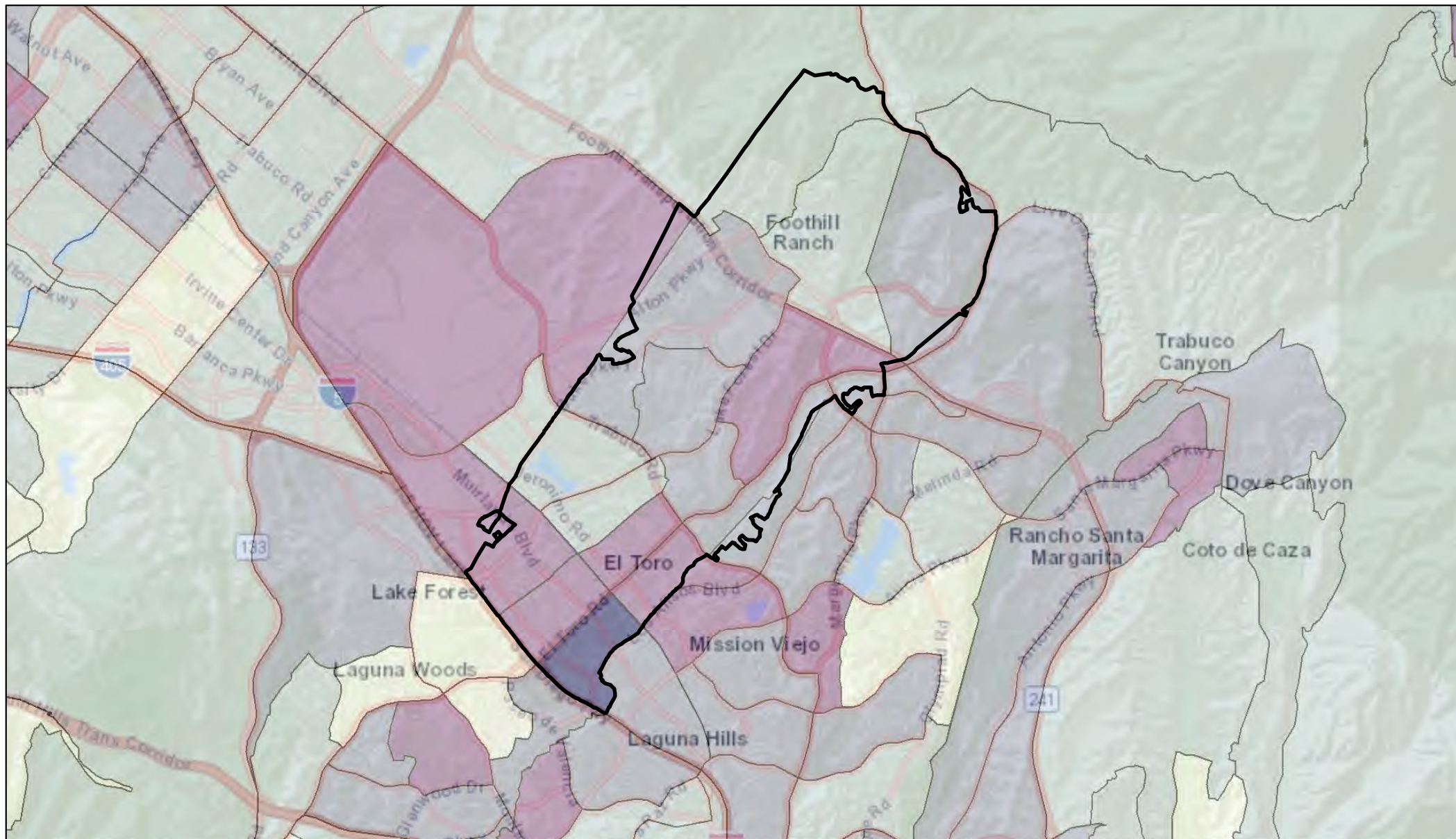
Focus on the people you have in the community that are paying taxes and stop catering to activist, lobbyist, etc. We don't need to encourage more people to move here, especially ones that can't afford to live here and will only end up on tax payer assistance programs. Anonymous

Map A: City of Lake Forest - Asian Resident Concentration

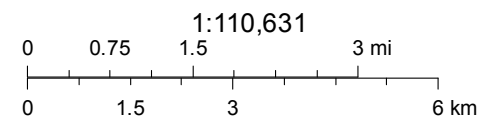
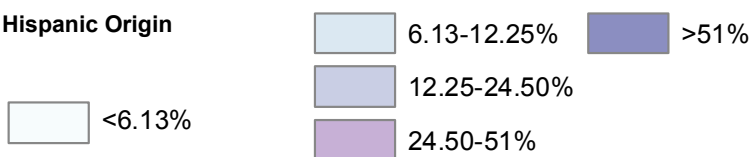


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Map B: City of Lake Forest - Hispanic/Latino Resident Concentration

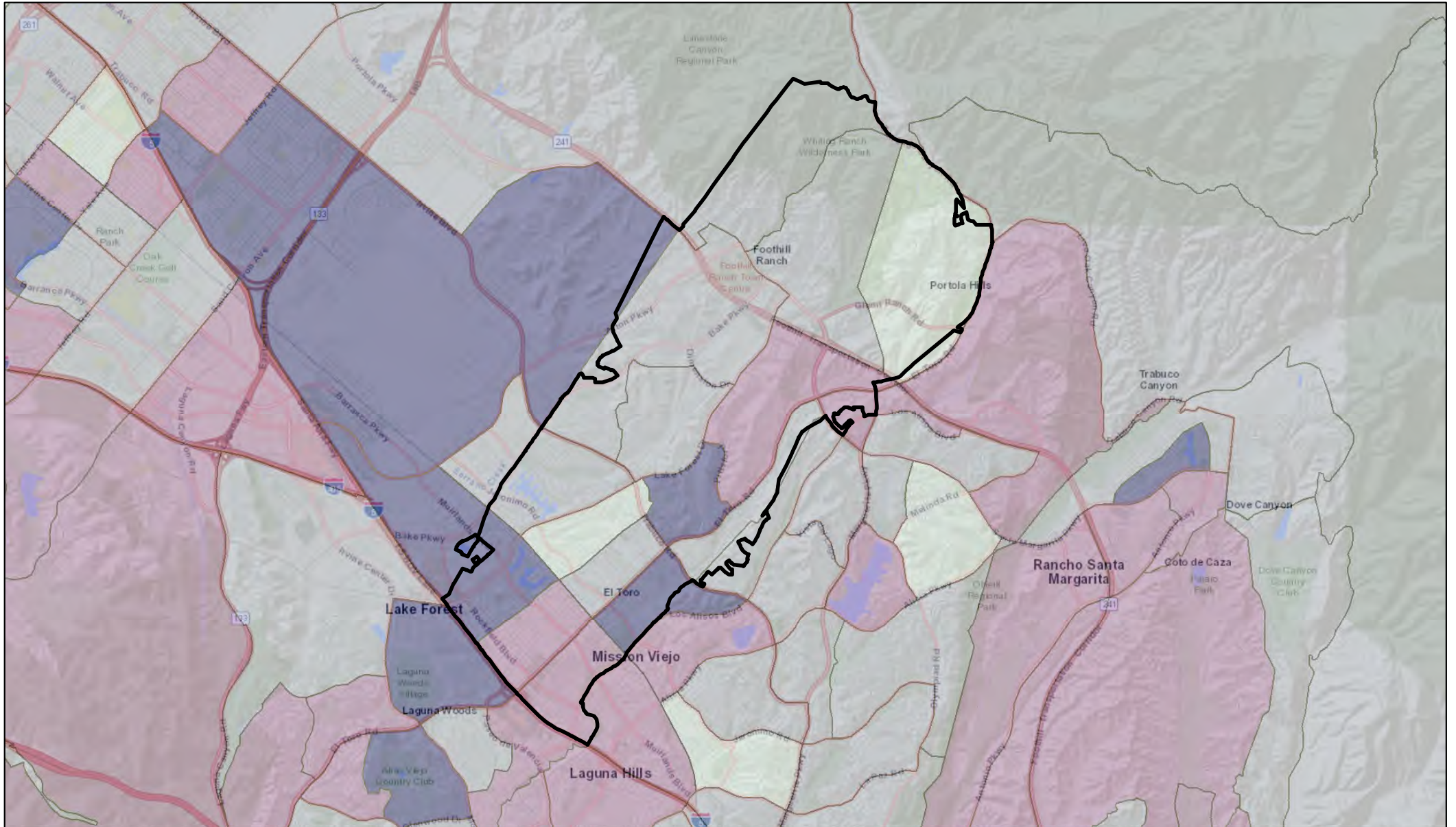


Hispanic Origin

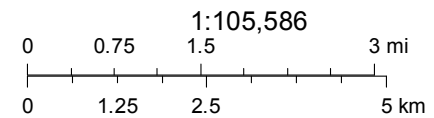
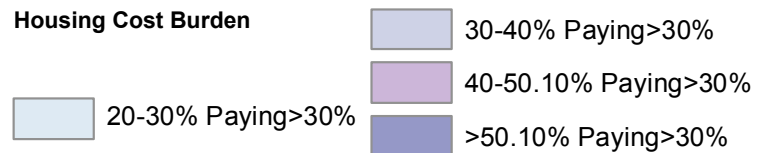


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Map C: City of Lake Forest - Housing Cost Burden Concentration



Housing Cost Burden

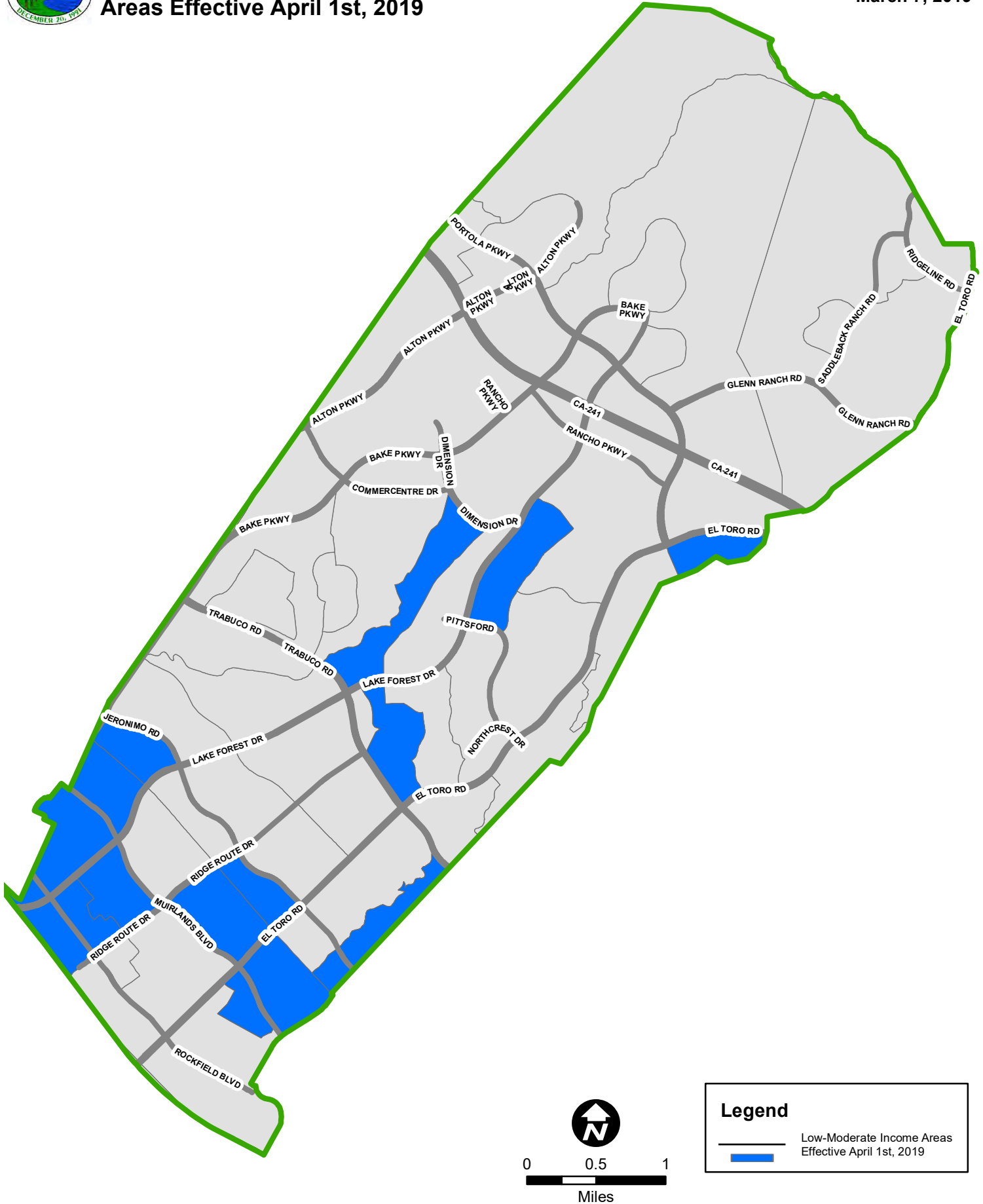


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Map D: City of Lake Forest Low-Moderate Income Areas Effective April 1st, 2019

Community Development Dept.
March 7, 2019



ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



This Executive Summary is extracted from a larger draft document. The entire draft document is available for review on the City of Lake Forest web page www.lakeforestca.gov



Prepared by the Orange County Jurisdictions and the Lawyers' Committee for Civil Rights Under Law
May 5, 2020

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II. EXECUTIVE SUMMARY

Orange County's Analysis of Impediments to Fair Housing Choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively furthering fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the following information was reviewed and analyzed:

- Data from the U.S. Census Bureau, American Community Survey 2013-2017 and other sources about the demographic, housing, economic, and educational landscape of the County, nearby communities, and the broader Region;
- Various County and city planning documents and ordinances;
- Data reflecting housing discrimination complaints;
- The input of a broad range of stakeholders that deal with the realities of the housing market and the lives of members of protected classes in Orange County.

As required by federal regulations, the AI draws from the sources listed above to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the County as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

The Orange County AI is a collaborative effort between the following jurisdictions: Aliso Viejo, Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Irvine, Laguna Niguel, La Habra, Lake Forest, La Palma, Mission Viejo, Orange, Rancho San Margarita, San Clemente, San Juan Capistrano, Santa Ana, Tustin, Westminster, and the County of Orange. Although this is a county-wide AI, there are jurisdiction-specific versions that include goals specific to each jurisdiction.

Overview of Orange County

According to U.S. Census data, the population of Orange County has changed considerably from 1990 to present day. The population has grown from just over 2.4 million in 1990 to nearly 3.2 million people today. The demographics of the County have undergone even more dramatic shifts over this time period: the white population has gone from 76.2% in 1990 to 57.8% in the 2010 Census, with corresponding increases in Hispanic (from 13.5% to 21.2%) and Asian (from 8.6% to 18.3%) populations in that same time period. These trends represent accelerations of the broader Los-Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area (the Region). In the Region,

white population percentage has declined from 45.9% percent to under 31.6%, with substantial increases in the percentages of Hispanic (from 34.7% to 44.4%) and Asian (from 10.2% to 16%) from the 1990 to 2010 Censuses.

There are numerous ethnic enclaves of Hispanic, Vietnamese, Chinese and other groups throughout Orange County. These enclaves provide a sense of community and a social network that may help newcomers preserve their cultural identities. However, these active choices should not obscure the significant impact of structural barriers to fair housing choice and discrimination.

Within both Orange County and the broader Region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, with monthly housing costs exceeding 50 percent of monthly income, than do non-Hispanic White households. In Orange County, Hispanic households are most likely to experience severe housing cost burden; in the Region, it is Black households.

There are 194,569 households in Orange County experiencing housing cost burden, with monthly housing costs exceeding 30 percent of monthly income. 104,196 of these households are families. However, Orange County has only 429 Project-Based Section 8 units and 33 Other Multifamily units with more than one bedroom capable of housing these families. Housing Choice Vouchers are the most utilized form of publicly supported housing for families, with 2,286 multi-bedroom units accessed. Large family households are also disproportionately affected by housing problems as compared with non-family households. Some focus groups have communicated that regulations and cost issues can make Orange County too expensive for families. The high percentage of 0-1-bedroom units in publicly supported housing and the low percentage of households with children in publicly supported housing support this observation.

The federal Fair Housing Act and the California Fair Employment and Housing Act provide Orange County residents with some protections from displacement and work to increase the supply of affordable housing. In addition, jurisdictions throughout Orange County have worked diligently to provide access to fair housing through anti-housing discrimination work, creating housing opportunities designed to enhance resident mobility, providing zoning flexibility where necessary, and working to reduce hate crimes. Even so, these protections and incentives are not enough to stem the loss of affordable housing and meet the housing needs of low- and moderate-income residents.

Contributing Factors to Fair Housing Issues

The AI includes a discussion and analysis of the following contributing factors to fair housing issues:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes

7. Availability, type, frequency, and reliability of public transportation
8. Community opposition
9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law.

Proposed Goals and Strategies

To address the contributing factors described above, the AI plan proposes the following goals and actions:

Regional Goals and Strategies

Goal 1: Increase the supply of affordable housing in high opportunity areas.¹

Strategies:

1. Explore the creation of a new countywide source of affordable housing.
2. Using best practices from other jurisdictions, explore policies and programs that increase the supply affordable housing, such as linkage fees, housing bonds, inclusionary housing, public land set-aside, community land trusts, transit-oriented development, and expedited permitting and review.
3. Explore providing low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 80% of the Area Median Income to develop accessory dwelling units with affordability restriction on their property.
4. Review existing zoning policies and explore zoning changes to facilitate the development of affordable housing.
5. Align zoning codes to conform to recent California affordable housing legislation.

Goal 2: Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, other seniors, and people with disabilities.

Strategies:

1. Explore piloting a Right to Counsel Program to ensure legal representation for tenants in landlord-tenant proceedings, including those involving the application of new laws like A.B. 1482.

Goal 3: Increase community integration for persons with disabilities.

Strategies:

1. Conduct targeted outreach and provide tenant application assistance and support to persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization. As part of that assistance, maintain a database of housing that is accessible to persons with disabilities.
2. Consider adopting the accessibility standards adopted by the City of Los Angeles, which require at least 15 percent of all new units in city-supported Low-Income Housing Tax Credit (LIHTC) projects to be ADA-accessible with at least 4 percent of total units to be accessible for persons with hearing and/or vision disabilities.

¹ The term “high opportunity areas” generally means locations where there are economic and social factors and amenities that provide a positive impact on a person’s life outcome. This is described in more detail in Section iii, Disparities in Access to Opportunity.

Goal 4: Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.

Strategies:

1. Reduce barriers to accessing rental housing by exploring eliminating application fees for voucher holders and encouraging landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
2. Consider incorporating a fair housing equity analysis into the review of significant rezoning proposals and specific plans.

Goal 5: Expand access to opportunity for protected classes.

Strategies:

1. Explore the voluntary adoption of Small Area Fair Market Rents or exception payment standards in order to increase access to higher opportunity areas for Housing Choice Voucher holders.
2. Continue implementing a mobility counseling program that informs Housing Choice Voucher holders about their residential options in higher opportunity areas and provides holistic supports to voucher holders seeking to move to higher opportunity areas.
3. Study and make recommendations to improve and expand Orange County's public transportation to ensure that members of protected classes can access jobs in employment centers in Anaheim, Santa Ana, and Irvine.
4. Increase support for fair housing enforcement, education, and outreach.

Individual Jurisdictions' Proposed Goals and Strategies

City of Aliso Viejo

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

City of Anaheim

1. *Increase the supply of affordable housing through the following strategies:*
 - a. *Explore creative land use and zoning policies that facilitate the development of affordable housing, examples include a housing overlay zone or religious institutions amendment.*
 - b. *Review Anaheim's current Density Bonus and Accessory Dwelling Unit (ADU) Ordinances to ensure compliance with state requirements.*
 - c. *Support legislation that that removes CEQA requirements for affordable housing.*
 - d. *Continue to support tenant based rental assistance programs that facilitates additional affordable housing for homeless and low-income individuals.*
2. *Preserve the existing stock of affordable rental housing and rent stabilized housing through the following strategies:*
 - a. *Strengthen and expand education and outreach of tenants and owner of affordable rental housing at risk of conversion to market rents.*
 - b. *Extend affordability restrictions through loan extensions, workouts and buy-downs if affordability.*
 - c. *Preserve at-risk housing through the issuance of Tax-Exempt Bond financing.*
 - d. *Explore the development of a rental rehabilitation loan program.*
3. *Expand the access to fair housing services and other housing services through the following strategies:*
 - a. *Dedicate eligible entitlement dollars (CDBG, HOME, etc.) and explore local, state and federal resources to expand fair housing services.*
 - b. *Continue to support fair housing testing and investigation to look for evidence of differential treatment and disparate impact, including providing services to low income tenants reporting fair housing violations.*
 - c. *Continue to support fair housing presentations, mass media communications, and multi-lingual literature distribution; conduct fair housing presentations at accessible locations and conduct fair housing presentations for housing providers*
 - d. *Explore alternative formats for fair housing education workshops such as pre-taped videos and/ or recordings. Such formats could serve persons with one or more than one job, families with you children and other who find it difficult to attend meetings in person.*
4. *Continue efforts to build complete communities through the following strategies:*
 - a. *Maximize and secure funding from State of California's Cap and Trade Program (Greenhouse Gas Reduction Fund), to improve housing opportunities, increase economic investments and address environmental factors in disadvantaged communities.*
 - b. *The City will continue to work with local transit agencies and other appropriate agencies to facilitate safe and efficient routes of transportation, including public transit, walking and biking.*
 - c. *Explore development of a policy to encourage developers to provide residents with incentives to use non-auto means of transportation, including locating new developments near public transportation and providing benefits such as bus passes.*

- d. *Target workforce development resources in racially or ethnically concentrated areas of poverty to improve economic mobility.*

City of Buena Park

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

City of Costa Mesa

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*

City of Fountain Valley

1. *Explore an inclusionary zoning requirement for all new housing developments that requires at least 10-15 percent of for-sale units be affordable to households with incomes 80 percent or below and rental units be affordable to households with incomes 60 percent or below.*
2. *Consider adopting an expedited permitting and review process for new developments with an affordable housing set-aside.*

City of Fullerton

1. *Create a Housing Incentive Overlay Zone (HOIZ).*
2. *Draft and Approve an Affordable Housing and Religious Institutions Amendment to the Municipal Code.*
3. *Work with the State to streamline or remove CEQA Requirements for Affordable Housing.*
4. *Require Affordable Housing in Surplus Property Sales.*

City of Garden Grove

1. *Update Density Bonus Ordinance – Garden Grove will update the 2011 Density Bonus Ordinance to comply with current State law. The update will streamline the approval process, increase feasibility, and facilitate future housing development at all affordability levels.*
2. *Create Objective Residential Development Standards to allow for streamlined housing development in all residential zones.*
3. *Create Objective Development Standards for Supportive Housing. These standards would be for new construction of Supportive Housing.*
4. *Evaluate the creation of Objective Development Standards for Hotel/Motel/Office Conversion to Supportive Housing.*
5. *Review and amend Garden Grove’s current Accessory Dwelling Unit (ADU) Ordinance to comply with State requirements and further increase housing supply.*
6. *Continue to invest in landlord and tenant counseling and mediation services, unlawful detainer assistance, housing discrimination services, homebuyer education and outreach, and local eviction prevention strategies.*

City of Huntington Beach

1. *Modify the existing Inclusionary Housing Ordinance to increase the supply of affordable housing opportunities available to lower income persons and households.*

- a. *Study the current methodology of setting the maximum sales price and down payment requirements of an affordable home for ownership.*
 - b. *Study requirements for the provision of inclusionary units through on-site units, dedication of land, in-lieu fees, and off-site development.*
 - c. *Study the in-lieu fee structure.*
 - d. *Explore the provision of incentives for developments that exceed inclusionary requirements and/or provide extremely low-income units on site. Incentives can be through the provision of fee waivers and deferrals, financial assistance, regulatory relief, and flexible development standards.*
2. *Update the density bonus ordinance to be consistent with state law,*
 3. *Expand the TBRA program to help tenants impacted by Covid-19. Currently, an eviction moratorium is in place to prevent evictions due to lack of non-payment of rent due to Covid-19. This moratorium ends on May 31, 2020. The moratorium does not end the obligation to pay the rent eventually. On June 1, 2020, there most likely will be an increased need from persons to receive rental assistance for the rents due prior to May 31 and going forward. The City would work with its current service providers to help tenants impacted by Covid-19.*

City of Irvine

1. *Ensure compliance with their HCD-certified Housing Element.*
2. *Update Density Bonus Ordinance – Irvine will update the Density Bonus Ordinance to comply with current State law.*
3. *Review and amend Irvine’s Inclusionary Housing Ordinance, as necessary, to increase its effectiveness.*
4. *Review and amend Irvine’s current Accessory Dwelling Unit (ADU) Ordinance to comply with State requirements and further increase housing supply.*
5. *Create Objective Development Standards for Supportive Housing. These standards would be for new construction of Supportive Housing.*
6. *Working with the City’s fair housing services provider, continue to invest in local eviction prevention strategies to reduce the number of homeless individuals and families in Irvine.*
7. *Working with the City’s fair housing services provider, continue to invest in landlord and tenant counseling and mediation services, unlawful detainer assistance, housing discrimination services, and homebuyer education and outreach.*

City of La Habra

1. *Explore the creation of an inclusionary housing ordinance to increase the number of affordable housing units.*

2. *Advocate for increasing the minimum percentage of affordable units at Park La Habra Mobile Home and View Park Mobile Home Estates from 20 percent to 50 percent.*

City of Laguna Niguel

1. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
2. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - b. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
3. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. *Include testing/audits within the scope of work with fair housing provider.*
4. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
5. *Update zoning ordinance to comply with current State law.*
6. *In cooperation with the Orange County Transportation Authority, provide community education regarding transport services for persons with disabilities.*
7. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*

City of Lake Forest

1. *In collaboration with the Orange County Housing Authority (OCHA):*

- a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. *Include testing/audits within the scope of work with fair housing provider.*
 - f. *Regularly consult with the City's fair housing contractor on potential strategies for affirmatively furthering fair housing on an on-going basis.*
 3. *In cooperation with the Orange County Transportation Authority:*
 - a. *Provide community education regarding transport services for persons with disabilities.*
 - b. *Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*
 4. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
 5. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
 6. *Update zoning ordinance to comply with current State law.*

City of Mission Viejo

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*

- b. Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
 - 2. Through the City's fair housing contractor:*
 - a. Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. Include testing/audits within the scope of work with fair housing provider.*
 - 3. In cooperation with the Orange County Transportation Authority:*
 - a. Provide community education regarding transport services for persons with disabilities.*
 - b. Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*
 - 4. Monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City's fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.*
 - 5. Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
 - 6. Seek funding through State programs (SB2/PLHA) to expand affordable housing and or homelessness prevention services.*
 - 7. Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
 - 8. Update zoning ordinance to comply with current State law.*

City of Orange

- 1. Continue to follow current State Density Bonus law and further its implementation through a Density Bonus ordinance update.*

2. *Prepare a Transfer of Development Rights Ordinance to provide opportunities for development rights transfers to accommodate higher density housing in transit and employment-rich areas of the city.*
3. *Prepare and adopt a North Tustin Street Specific Plan with an objective of providing opportunities for affordable housing.*
4. *Amend the City's Accessory Dwelling Unit Ordinance to be consistent with State Junior Accessory Dwelling Unit (JADU) and Accessory Dwelling Unit (ADU) laws.*
5. *Prepare and adopt a small lot subdivision ordinance to streamline entitlement processing of housing development projects.*
6. *Continue providing CDBG funds to the Fair Housing Foundation to provide fair housing activities to the community.*

City of Rancho Santa Margarita

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. *Include testing/audits within the scope of work with fair housing provider.*
3. *In cooperation with the Orange County Transportation Authority:*
 - a. *Provide community education regarding transport services for persons with disabilities.*
 - b. *Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.*

4. *Monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City's fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.*
5. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
6. *Seek funding through State programs (SB2/PLHA) to expand affordable housing and or homelessness prevention services.*
7. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
8. *Update zoning ordinance to comply with current State law.*

City of San Clemente

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. *Include testing/audits within the scope of work with fair housing provider.*
3. *Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).*
4. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*

5. *Update zoning ordinance to comply with current State law.*
6. *Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities by facilitating affordable housing throughout the community through 1) flexible development standards; 2) density bonuses; and 3) other zoning tools.*
7. *Review the type and effectiveness of current affordable housing development incentives, and amend/augment as may be necessary to increase the production of affordable housing units.*

City of San Juan Capistrano

1. *Develop Strategies to Address Lack of Affordability and Insufficient Income*
 - a. *Work with developers, and non-profit organizations to expand the affordable housing stock within San Juan Capistrano.*
 - b. *Increase production of new affordable units and assistance towards the purchase and renovation of housing in existing neighborhoods.*
 - c. *Seek housing program resources through the County of Orange Urban County CDBG Program, and others which may become available.*
2. *Increase Public Awareness of Fair Housing*
 - a. *Increase fair housing education and outreach efforts.*
 - b. *Investigate options for enforcement including local enforcement conducted by neighboring jurisdictions.*
3. *Develop Strategies to Address Poverty and Low-Incomes Among Minority Populations*
 - a. *Expand job opportunities through encouragement of corporations relocating to the city, local corporations seeking to expand, assistance with small business loans, and other activities.*
 - b. *Support agencies that provide workforce development programs and continuing education courses to increase educational levels and job skills of residents.*
4. *Develop Strategies to Address Limited Resources to Assist Lower-Income, Elderly, and Indigent Homeowners Maintain their Homes and Stability in Neighborhoods*
 - a. *Consider implementing a volunteer program for providing housing assistance to elderly and indigent property owners, including assistance in complying with municipal housing codes.*
 - b. *Encourage involvement from volunteers, community organizations, religious organizations, and businesses as a means of supplementing available financial resources for housing repair and neighborhood cleanup.*

City of Santa Ana

1. *Review and amend Santa Ana's inclusionary housing ordinance to increase its effectiveness.*
2. *Evaluate the creation of a motel conversion ordinance to increase the supply of permanent supportive housing similar to the City of Anaheim and Los Angeles.*

3. *Review Santa Ana's density bonus ordinance and explore adding a density bonus for transit-oriented development (TOD) similar to the City of Los Angeles.*
4. *Explore establishing a dedicated source of local funding for a Right to Counsel program for residents of Santa Ana to ensure that they have access to legal representation during eviction proceedings similar to the City of New York.*
5. *Continue to invest in local eviction prevention strategies to reduce the number of homeless individuals and families in Santa Ana.*

City of Tustin

1. *In collaboration with the Orange County Housing Authority (OCHA):*
 - a. *Attend quarterly OCHA Housing Advisory Committee to enhance the exchange of information regarding the availability, procedures, and policies related to the Housing Assistance Voucher program and regional housing issues.*
 - b. *Support OCHA's affirmative fair marketing plan and de-concentration policies by providing five-year and annual PHA plan certifications.*
 - c. *In coordination with OCHA and fair housing services provider, conduct landlord education campaign to educate property owners about State law prohibiting discrimination based on household income.*
2. *Through the City's fair housing contractor:*
 - a. *Provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.*
 - b. *Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach may include workshops, informational booths, presentations to community groups, and distribution of multi-lingual fair housing literature.*
 - c. *Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.*
 - d. *Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.*
 - e. *Include testing/audits within the scope of work with fair housing provider.*
3. *Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.*
4. *Utilize funding through State programs (SB2) to support affordable housing and/or homeless prevention services.*
5. *Update zoning ordinance to comply with current State law.*

The AI lays out a series of achievable action steps that will help jurisdictions in Orange County to not only meet its obligation to affirmatively fair housing but to continue to be a model for equity and inclusion in Orange County.

Draft

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.


Signature of Authorized Official

6-18-20
Date

CITY MANAGER
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) **2020, 2021, and 2022** [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

Debrahne
Signature of Authorized Official

6-18-20
Date

CITY MANAGER
Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208©:

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Delrause
Signature of Authorized Official

6-18-20
Date

City Manager
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424

* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
---	---	--

* 3. Date Received: 06/17/2020	4. Applicant Identifier: B-20-MC-06-0584
--	--

5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____
--	---

State Use Only:

6. Date Received by State: _____	7. State Application Identifier: _____
---	---

8. APPLICANT INFORMATION:

* a. Legal Name: CITY OF LAKE FOREST	
* b. Employer/Taxpayer Identification Number (EIN/TIN): 33-0495169	* c. Organizational DUNS: 0519057790000

d. Address:

* Street1:	100 CIVIC CENTER DRIVE
Street2:	_____
* City:	LAKE FOREST
County/Parish:	ORANGE
* State:	CA: California
Province:	_____
* Country:	USA: UNITED STATES
* Zip / Postal Code:	92630-0000

e. Organizational Unit:

Department Name: DEVELOPMENT SERVICES	Division Name: PLANNING
---	-----------------------------------

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: MS	* First Name: GAYLE
Middle Name: _____	
* Last Name: ACKERMAN	
Suffix: _____	
Title: DIRECTOR OF COMMUNITY DEVELOPMENT	
Organizational Affiliation: City of Lake Forest	
* Telephone Number: 949-461-3461	Fax Number: 949-461-3512
* Email: gackerman@lakeforestca.gov	

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

HOUSING AND URBAN DEVELOPMENT

11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

COMMUNITY DEVELOPMENT BLOCK GRANT

*** 12. Funding Opportunity Number:**

NA

* Title:

NA

13. Competition Identification Number:

NA

Title:

NA

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

CDBG funds will be used to provide housing rehab loans/grants, low/mod public services & program admin in the City of Lake Forest, CA.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="513,849.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="72,650.00"/>
* f. Program Income	<input type="text" value="30,000.00"/>
* g. TOTAL	<input type="text" value="616,499.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Middle Name:

* Last Name:

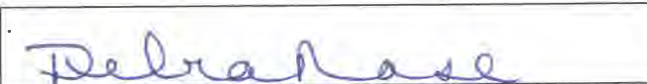
Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative: 

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	CITY MANAGER
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF LAKE FOREST	06/18/2020