



2024-2025

CDBG  
Annual  
Action  
Plan

May 7, 2024

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# Executive Summary

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

### 1. Introduction

The 2024-2025 Annual Action Plan for the City of Lake Forest satisfies the requirements to receive Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The CDBG program was created by the Housing and Community Development Act (HCDA) of 1974. 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.

Regulations governing the CDBG program require that each activity undertaken with CDBG funds must meet one of the three national objectives:

- Benefit low- and moderate-income persons
- Aid in the prevention or elimination of slums and blight or
- Meet a community development need having a particular urgency (i.e., federally declared disaster)

As a recipient of CDBG funds, the City must prepare a five-year strategic plan that identifies housing and community needs, prioritizes these needs, and develops a strategic plan to address priority needs. This document is called the Consolidated Plan. The City's current Consolidated Plan covers the fiscal years of 2020-21 to 2024-25. On an annual basis, the City prepares an expenditure plan that identifies the specific activities it will undertake with its annual CDBG allocation to meet the priority needs identified in the Consolidated Plan. Fiscal Year (FY) 2024-25 is the fifth year of the current Consolidated Plan cycle.

HUD has notified the City that it will receive \$518,153 in CDBG funds for FY 2024-25 – approximately 0.5% less than the City's current year CDBG allocation. An additional \$90,600 in prior year uncommitted funds and program income received during the year will also be available for programming.

### 2. Summarize the objectives and outcomes identified in the Plan

The City of Lake Forest City Council approved the 2020-2024 Consolidated Plan in June 2020. The following Consolidated Plan objectives and outcomes were adopted. Corresponding annual accomplishment goals for FY 2024-25 are also listed below:

- Infrastructure and Facility Improvements: Improve public infrastructure and facilities that benefit 7,500 low- and moderate-income residents. FY 2024-25 Goal: Install APS Pushbuttons at 18 locations
- Affordable Housing: Improve or expand the supply of housing affordable to 40 lower-income households. FY 2024-25 Goal: Rehab 9 housing units

- Public Services: Provide access to public social services for 8,000 low- and moderate-income persons. FY 2024-25 Goal: benefit 2,519 low- and moderate-income residents
- Homeless Continuum of Care: Provide access to housing and supportive services for 2,680 persons at risk of becoming homeless or who are homeless. FY 2024-25 Goal: benefit 738 low- and moderate-income residents
- Administration and Planning: Provide CDBG program oversight and coordination and fair housing services to 450 households. FY 2024-25 Goal: 95 households residents assisted (fair housing services)

### **3. Evaluation of past performance**

FY 2023-24 (the current fiscal year) is the fourth year of the City’s 2020-2024 Consolidated Plan cycle. Most planned activities will be completed by June 30, 2024. A table summarizing the City’s Consolidated Plan goals over three completed years (FY 2020-21 through FY 2022-23) is provided as Attachment 1.

### **4. Summary of Citizen Participation Process and Consultation Process**

City staff encouraged residents and local and regional organizations to review the 2024–2025 Annual Action Plan. There were several opportunities for City residents and agencies/organizations to offer input into the Consolidated Plan process, as noted below:

- A draft of the Consolidated Plan was made available for a 30-day public comment period from April 5 to May 6, 2024.
- The City Council held a public hearing on May 7, 2024, to obtain public comments regarding the Annual Action Plan.

### **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 Consolidated Plan is a strategic plan that utilizes data and public input to determine priority housing and community needs. The Annual Action Plan is the expenditure plan for using CDBG funds to address identified priorities. The City’s overall objective for the CDBG program is to create a viable community by providing decent housing, a suitable living environment, and economic opportunities, principally for low- and moderate-income persons. To accomplish these objectives, the City of Lake Forest will utilize \$608,753 in CDBG funds and program income during FY 2024-25 to carry out various eligible activities.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

*Agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.*

**Table 1 – Responsible Agencies**

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	LAKE FOREST	City Manager’s Office

**Narrative (optional)**

The City Manager’s office oversees the City’s CDBG program, including preparing the Consolidated Plan, Annual Action Plans, and year-end performance reports (Consolidated Annual Performance and Evaluation Report or CAPER).

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(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 identifying the agencies that participated in the process. Jurisdictions must also summarize their efforts to enhance coordination between public and private agencies.

#### **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 City Manager’s 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 service duplication, 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 Lake Forest renters.
- To strengthen the private sector's housing delivery system, the City encourages private housing developers to include affordable units in multi-family housing developments within Lake Forest. The City will also continue cooperating 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 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's economic development program coordinates business activities and employment programs with community organizations such as the Lake Forest Chamber of Commerce and the OC Workforce & Economic Development.

#### **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.**

Coordinating 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 regional homeless system of care.

The City supports the CoC planning process by providing information regarding the activities it will fund to address local homeless issues. The OC-CoC used this information 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. Additionally, the City supports and participates 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City does not receive Emergency Solutions Grant (ESG) funds; therefore, it does not help the OC-CoC determine ESG allocations, evaluate the outcomes, or develop policies and procedures for administering the regional Homeless Management Information System (HMIS).

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	<b>Orange County Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding households receiving HUD rental assistance and households on the waitlist for housing assistance
2	<b>Agency/Group/Organization</b>	<b>211 Orange County</b>
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Homeless Management Information System (HMIS)
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided data regarding regional homeless, housing/service gaps for the homeless, and HMIS management
3	<b>Agency/Group/Organization</b>	<b>Fair Housing Council of Orange County</b>
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Impediments to Fair Housing

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	<b>Age Well Senior Services</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the housing and service needs of seniors, including homebound and frail seniors
5	<b>Agency/Group/Organization</b>	<b>Families Forward</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding housing and service needs of homeless families and families at risk of becoming homeless
6	<b>Agency/Group/Organization</b>	<b>Family Assistance Ministry</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding housing and service needs of homeless households and households at risk of becoming homeless
7	<b>Agency/Group/Organization</b>	<b>South County Outreach</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the needs of lower-income households, specifically individuals/households at risk of becoming homeless
8	<b>Agency/Group/Organization</b>	<b>Camino Health Center</b>
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding medical/dental service needs of the community, including homeless individuals
9	<b>Agency/Group/Organization</b>	<b>Alzheimer's Orange County</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities

	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the service needs of seniors with Alzheimer’s and other forms of dementia and disabilities
10	<b>Agency/Group/Organization</b>	<b>County of Orange</b>
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Regional program information
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various county departments provided information regarding public health, public safety, and housing programs
11	<b>Agency/Group/Organization</b>	<b>Vocational Visions</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Economic development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the needs of adults with developmental disabilities

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

The City consulted with various 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**

**Table 3 – Other local / regional / federal planning efforts**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	211-Orange County	Addresses issues pertaining to homelessness, including the 2022 Homeless Point-in-Time Survey
5-Year Plan & 1-Year Public Housing Authority (PHA) Plan	Orange County Housing Authority	Agency plans and policies related to providing rental assistance for very low-income households
Housing Element	City of Lake Forest	City policies and goals for the preservation and expansion of the City’s housing stock
Capital Improvement Budget	City of Lake Forest	Includes a multi-year plan for the use of CDBG funds for capital projects
Analysis of Impediments to Fair Housing	Orange County HUD Grantee Cities and the County of Orange	The countywide document identifies fair housing impediments within participating cities and outlines a plan to address issues

**Narrative (optional)**

**AP-12 Participation – 91.105, 91.200(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 Annual Action Plan preparation process. The City’s Citizen Participation Plan outlines the City’s process to obtain public participation in developing the Annual Action Plan (AAP) and other facets of the CDBG Program. Action steps include a 30-day public review of the Action Plan and a public hearing before the City Council. The public notice and a summary of public comments are provided in Attachment 2.

**Citizen Participation Outreach**

**Table 4 – 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	Internet Outreach	Nonprofits	Notification of availability of CDBG funding for FY 24-25	NA	NA	<a href="http://www.lakeforestca.gov/en/departments/economic-development/housing/community-development-block-grant">www.lakeforestca.gov/en/departments/economic-development/housing/community-development-block-grant</a>
2	Newspaper Ad	Non-targeted/broad community	Notice regarding the 30-day public review period (4/5/24 to 5/6/24) and public hearing	See Attachment 2	None	NA
3	Public Hearing	Non-targeted/broad community	5/7/24 City Council public hearing to review the draft Action Plan and receive public comment	See Attachment 2	None	NA

## Expected Resources

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

#### Introduction

Fluctuations in annual CDBG allocations make it challenging to determine anticipated resources for five years; 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 that it will receive \$518,153 in CDBG funds for FY 2024-25 – approximately 0.5% less than the City’s current year CDBG allocation. Additional resources for the year include \$90,600 in prior year uncommitted funds and program income (i.e., Revolving Loan funds) received during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 165 households per year. The City will continue its efforts to leverage CDBG funds with other federal, state, and local funds.

#### Anticipated Resources

**Table 5 - Expected Resources – Priority Table**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				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	518,153	0	90,600	608,753	0	CDBG annual allocation, prior year funds, and projected loan repayments

**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 January 2024, 166 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 165 Lake Forest households during FY 2024-25.
- The City may use local or state resources to fund homeless outreach activities during FY 2024-25.
- The City does not have an inclusionary housing program; however, the Housing Element indicates that the City will encourage developers to include a minimum of 15 percent affordable units in their housing projects. Alternatively, developers may pay an in-lieu fee instead of constructing affordable units. The City will negotiate an agreement with a developer to ensure units are built or collect the in-lieu fee.

CDBG does not require matching funds.

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

The City of Lake Forest Housing Authority owned assets formerly held by the Lake Forest Redevelopment Agency. The Housing Authority sold a tax-defaulted vacant parcel purchased from the County of Orange to the City on August 16, 2022 (the “Mamie Thomas Parcel”). The City Council approved the property purchase via a Quitclaim Deed and a Certificate of Acceptance. It authorized the City Manager to transfer the purchase price of \$310,000 from the City's General Fund to the Housing Authority's Housing Asset Fund. The Housing Authority will use these funds to support future affordable housing activities.

In 2020, the City approved the construction of a 71-unit apartment project for seniors earning less than 60% of the area median income. The “Mountain View” project is located at 24551 Raymond Way. Eight units serve as supportive housing for formerly homeless seniors with special needs. The project is completed/open. A second project, Portola Senior Apartments (931 Portola Oaks Drive), was also completed and is open. The project includes 57 one-bedroom senior apartment units that are affordable for seniors aged 62 plus earning 50% or less of the area median income. The project offers amenities and support services to help increase senior residents' financial and housing stability. A third project, The Meadows Seniors Apartments, is a 65-unit active adult community available to seniors 62 years and older. The affordable apartment community

is currently under construction, with an anticipated opening date in late 2024. Lastly, in March 2024, the City entered into an Exclusive Negotiation Agreement with National CORE for another affordable housing project. The City has approximately \$3.35 million to invest in the project.

### **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 become available (e.g., City of Lake Forest Housing Authority, general fund, or state funds), 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 - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Table 6 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure and Facility Improvements	2024	2025	Non-Housing Community Development	Citywide	Public Improvements	CDBG: \$175,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: Persons Assisted 4,774
2	Housing Preservation	2024	2025	Affordable Housing	Citywide	Affordable Housing	CDBG: \$252,453	Homeowner Housing Rehabilitated: 9 Household Housing Unit
3	Public Social Services	2024	2025	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$26,080	Public service activities other than Low/Moderate Income Housing Benefit: 2,519 Persons Assisted
4	Homeless Continuum of Care	2024	2025	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$51,620	Public service activities other than Low/Moderate Income Housing Benefit: 692 Persons Assisted  Homelessness Prevention: 46 Persons Assisted
5	Program Administration	2024	2025	Administration	Citywide	Administration and Planning	CDBG: \$103,600	Other: 95 Other

## Goal Descriptions

Table 7 – Goal Descriptions

1	<b>Goal Name</b>	Infrastructure and Facility Improvements
	<b>Goal Description</b>	Improve and expand public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
2	<b>Goal Name</b>	Housing Preservation
	<b>Goal Description</b>	Loans and grants to improve owner-occupied housing or expand the supply of housing affordable to lower-income households
3	<b>Goal Name</b>	Public Social Services
	<b>Goal Description</b>	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
4	<b>Goal Name</b>	Homeless Continuum of Care
	<b>Goal Description</b>	A continuum of supportive and housing services for the homeless and households at risk of homelessness
5	<b>Goal Name</b>	CDBG Program Administration
	<b>Goal Description</b>	CDBG program oversight and coordination, including fair housing services

**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 91.215(b):**

The City is not a participating jurisdiction in the HUD HOME program; however, an estimated nine (9) households will be assisted with CDBG-funded housing rehabilitation during FY 2024-25.

## AP-35 Projects – 91.220(d)

### Introduction

The activities to be undertaken during FY 2024-25 are summarized below. Most activities identified will be completed by June 30, 2025. Due to the delay in approving the federal 2024 budget, the City Council approved the FY 2024-2025 Action Plan with a provision that CDBG funding for activities will be increased or decreased by a percentage based on the final 2024 CDBG grant. Funding for the activities listed below has been adjusted accordingly.

**Table 8 – Project Information**

#	Project Name
1	CDBG Administration
2	Housing Rehabilitation Loans
3	Paint Program Grants
4	Age Well Senior Services
5	Alzheimer’s Orange County
6	Camino Health Center
7	Fair Housing Council of OC
8	Families Forward
9	Family Assistance Ministry
10	South County Outreach
11	Accessible Pedestrian Signal (APS) Push Buttons

### 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 competition for limited Housing Choice Vouchers and other housing programs can impact the City's ability to support affordable housing opportunities for extremely low- and very low-income households.

# Projects

## AP-38 Projects Summary

### Project Summary Information

Table 9 – Project Summary

<b>1</b>	<b>Project Name</b>	<b>CDBG Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	CDBG Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$96,100
	<b>Description</b>	CDBG program oversight and coordination
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	100 Civic Center, Lake Forest, CA (City Hall)
	<b>Planned Activities</b>	CDBG program oversight and coordination, including public service grant management, preparation of reports, and IDIS management
<b>2</b>	<b>Project Name</b>	<b>Housing Rehabilitation Loans *</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Preservation
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$217,453 (plus program income received during the year)

	<b>Description</b>	Housing rehabilitation loans for owner-occupied housing units
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	6 low- and moderate-income households
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Loans to rehabilitate owner-occupied housing units funded with entitlement funds and program income received during the year
<b>3</b>	<b>Project Name</b>	<b>Paint Program Grants *</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Preservation
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$35,000
	<b>Description</b>	Grants to assist homeowners in painting the exterior of their home
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 low- and moderate-income homeowners
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Grants to homeowners to paint the exterior of their home
<b>4</b>	<b>Project Name</b>	<b>Age Well Senior Services</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Services

	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$7,200
	<b>Description</b>	Meals on Wheels
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 Seniors and frail elderly
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Meals on Wheels for home-bound seniors and frail elderly
5	<b>Project Name</b>	<b>Alzheimer's Orange County</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$4,780
	<b>Description</b>	Adult day services
	<b>Target Date</b>	6/30/20245
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	19 seniors and disabled adults
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Adult daycare and ancillary services for seniors and adults with Alzheimer's, other forms of dementia, and disabilities

<b>6</b>	<b>Project Name</b>	<b>Camino Health Center</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Social Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$14,100
	<b>Description</b>	Low-cost medical services
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2,400 Individuals
	<b>Location Description</b>	22481 Aspen St., Suite A, Lake Forest, CA
	<b>Planned Activities</b>	Reduced-cost medical and dental services for low- and moderate-income persons
<b>7</b>	<b>Project Name</b>	<b>Fair Housing Council of OC</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	CDBG Program Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$7,500
	<b>Description</b>	Fair housing services
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	95 households (320 Individuals)

	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Fair housing outreach, education, and enforcement services to address impediments to fair housing
<b>8</b>	<b>Project Name</b>	<b>Families Forward</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Continuum of Care
	<b>Needs Addressed</b>	Homeless Support Services and Housing
	<b>Funding</b>	CDBG: \$18,970
	<b>Description</b>	Support services for at-risk and homeless families with children
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	32 homeless persons
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Case management for homeless families with children and families with children who are at risk of becoming homeless
<b>9</b>	<b>Project Name</b>	<b>Family Assistance Ministry</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Continuum of Care
	<b>Needs Addressed</b>	Homeless Support Services and Housing
	<b>Funding</b>	CDBG: \$12,300
	<b>Description</b>	Housing and services for households at risk of homelessness or that are homeless

	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	486 lower-income individuals (465 with support services and 21 with rent or utility assistance)
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Case management, food assistance, rental or utility assistance, and case management for households at risk of homelessness or that may be homeless
<b>10</b>	<b>Project Name</b>	<b>South County Outreach</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Continuum of Care
	<b>Needs Addressed</b>	Homeless Support Services and Housing
	<b>Funding</b>	CDBG: \$20,350
	<b>Description</b>	Homelessness prevention assistance
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	220 low- and moderate-income persons (195 with food pantry, supportive services, and case management, and 25 with rent or utility assistance)
	<b>Location Description</b>	7 Whatney St. B, Irvine, CA
	<b>Planned Activities</b>	Foodbank services, including case management - services also include emergency rent and utility assistance to prevent eviction or termination of services
<b>11</b>	<b>Project Name</b>	<b>Accessible Pedestrian Signal (APS) Push Buttons</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Improvements and Public Facilities

<b>Needs Addressed</b>	Non-Housing Community Development
<b>Funding</b>	CDBG: \$175,000
<b>Description</b>	Installation of APS push buttons comply with current ADA regulations
<b>Target Date</b>	6/30/2026
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Per HUD data, an estimated 4,774 individuals with a disability reside in the project area. Per U.S. Census 2022 5-Yr ACS data, 942 individuals residing in the project area have hearing difficulties, 733 have vision difficulties, and 1,70 have ambulatory difficulties
<b>Location Description</b>	CT: 320.14, 320.27, 524.10, 524.11, 524.15, 524.16, 524.24
<b>Planned Activities</b>	Installation of APS push buttons at 18 intersections comply with current ADA regulations

*\* The City is considering combining the Housing Rehabilitation Loan and Paint Program Grants programs into one Housing Rehabilitation Program during FY 24-25. Authorization for this action is pending City Council approval. If approved, funding and program beneficiary goals will be combined into one activity in IDIS.*

## 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 2024-25, CDBG funds will support citywide activities for eligible households regardless of where they live in Lake Forest. No “area-wide” activities are planned for FY 2024-25; however, a list of CDBG-eligible Census Tract Block Groups is provided in Attachment 3.

### Geographic Distribution

**Table 10 - Geographic Distribution**

Target Area	Percentage of Funds
CDBG Target Areas	0
Citywide	100

### Rationale for the priorities for allocating investments geographically

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

CDBG-funded infrastructure and facility improvements are typically undertaken within Low- and Moderate-Income areas with a higher percentage of lower-income residents (see Attachment 3 for a list of the City's CDBG-eligible areas). Some infrastructure/facility improvement projects may be undertaken outside the low- and moderate-income regions; 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 in the City. For FY 2024-25, CDBG funds will benefit residents citywide.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

Although the Consolidated Plan and Action Plan addresses the community's affordable housing needs, the City's only HUD funding source is CDBG. HUD regulations prohibit the use of CDBG to construct new housing; however, the City will allocate funds to preserve existing housing that is affordable to lower-income homeowners. Other housing resources available to the City, such as former redevelopment resources (i.e., Lake Forest Housing Authority), may be available to support affordable housing endeavors.

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	9
Special-Needs	0
<b>Total</b>	<b>9</b>

**Table 12 - One Year Goals for Affordable Housing by Support Type**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	9
Acquisition of Existing Units	0
<b>Total</b>	<b>9</b>

### Discussion

The City's CDBG-funded affordable housing strategy calls for maintaining affordable housing through housing rehabilitation programs and supporting rental assistance programs like the Housing Choice Voucher administered by the OCHA. The City anticipates that 165 Lake Forest renter households will receive rental assistance during FY 2024-25.

During the current and past Consolidated Plan cycles, the City has consistently funded a CDBG-funded housing rehabilitation loan and a separate housing rehabilitation grant program. To improve program efficiencies and effectiveness, the City is considering combining the two programs into one Housing Rehabilitation Program during FY 2024-25. Authorization for this action is pending City Council approval. If approved, funding and program beneficiary goals will be combined into one activity in IDIS. The City anticipates nine homeowners will participate in the City's housing rehabilitation program.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Lake Forest does not own or manage 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 addresses a household's immediate financial needs to prevent homelessness or shelter, 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 three agencies to provide services for homeless individuals. Each agency has an outreach component used to engage and assess clients.

In prior years, the City partnered with a local nonprofit to provide street homeless outreach services. In the fall of 2023, the City hired a Community Outreach Specialist. In addition to other duties, the outreach specialist is responsible for homeless outreach services. The City is funding this position with state Permanent Local Housing Allocation (PLHA) grant dollars.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City did not receive FY 2024-25 CDBG funding requests for emergency or transitional housing.

**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 has used CDBG and local 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. The City allocated CDBG funds in FY 2022-23 to support expanding the City's permanent affordable housing opportunities supply. The activity has encountered delays due to a limited supply of suitable properties; however, City staff

continues to work with local nonprofit housing providers to bring the project to fruition. The City is not allocating any additional CDBG funding for this type of housing activity for FY 2024-25.

For FY 2024-25, CDBG funding is allocated to Families Forward. Families Forward will utilize funds to provide case management and support services to families residing in affordable housing. This program aims to stabilize at-risk families in affordable housing. 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, 19 VASH vouchers are in place throughout Lake Forest.

**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 2024-25, the City will allocate CDBG funds to Family Assistance Ministries and South County Outreach for various services to assist the near-homeless and those already homeless. These agencies will also utilize CDBG funds to assist households at risk of eviction or the termination of utilities due to financial hardships. The City will also continue to support 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 people indicate that serving the homeless is a complex issue requiring a network of service providers. The City will allocate CDBG resources to support this network of agencies.

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

### **Introduction**

The City's Consolidated Plan provides detailed information regarding barriers to affordable housing and actions to overcome these barriers. The actions to address these barriers during FY 2024-25 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 construction costs, financing, and development regulations. The 2015–2021 Housing Element and 2020-2024 Consolidated Plan note 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 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 applying state density bonus provisions.
- The City will work with developers on a case-by-case basis to provide state-mandated regulatory concessions and incentives to develop affordable and senior housing. These concessions and incentives could include, but are not limited to, density bonuses, parking reductions, fee reductions or deferrals, expedited permit processing, and modified or waived development standards.
- If available, the City may provide financial subsidies to help reduce development costs in exchange for units reserved for lower-income residents.

### **Discussion**

The Consolidated Plan includes an extensive narrative regarding barriers to affordable housing and actions the City can take to mitigate identified obstacles to affordable housing development. As outlined above, the City provides an expedited development review process for affordable housing projects to reduce holding and overall development costs. 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**

Outlined below are additional actions the City will implement during FY 2024-25 to address the sub-strategies of the Consolidated Plan.

### **Actions planned to address obstacles to meeting underserved needs**

The City recognizes that special needs populations face challenges due to low income and unique life conditions. These individuals are often more likely to become homeless due to these factors. Special needs populations frequently require unique housing and supportive services. The City prioritizes supportive services and housing for special needs populations. In FY 2024-25, the City will fund public service agencies that assist underserved populations such as the homeless, seniors, people with disabilities, 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 and helping to ensure individuals have access to housing free of discrimination due to race, gender, disability, and other personal or household characteristics. The City has allocated significant CDBG resources to support these activities. The City will also support OCHA's administration of rental assistance programs like the Housing Choice Voucher and Certificate programs in Lake Forest.

### **Actions planned to reduce lead-based paint hazards**

The Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 changed the federal strategy for addressing LBP by emphasizing preventing childhood lead poisoning through housing-based approaches. Consequently, lead-based paint hazard reduction is 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 dangers of lead and encourage screening children for elevated blood lead levels. Additionally, housing units are tested for lead-based paint before using federal funds. 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 poverty by partnering with nonprofit agencies that assist lower-income households. Specifically, the City will fund programs that provide safety net services such as food banks, financial assistance to prevent eviction, low-cost medical/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 the coordination of programs that serve the community. For example, the City will partner with nonprofit entities to deliver public services. City departments will continue to collaborate 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 federal rental housing assistance and regional housing issues. As a supporter of the OC-CoC, the City will provide information for the County’s annual Continuum of Care Homeless Assistance grant application to HUD. The City will also continue to support the development of the County’s strategy to end chronic homelessness and a regional discharge plan.

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

The City will continue participating in regional service coordination by participating in the Cities Advisory Committee, a quarterly meeting of cities and OCHA to discuss federal rental housing assistance issues. Annually, the City meets with service providers to discuss service needs and ways to improve service to residents. Another example of enhanced coordination is preparing the countywide Analysis of Impediments to Fair Housing. The City participated in developing this document, which required significant jurisdictional coordination.

Broadband: According to BroadbandNow.com, 99.8 percent of Lake Forest residential properties have access to broadband internet services. Cox Communications is the top broadband service provider, covering 92.3 percent of the City. AT&T is also available via fiber optic cable to 86.9 percent of Lake Forest properties. Additional providers offer satellite or 5-G-based broadband service.

Most broadband service providers in Orange County participate in the Affordable Connectivity Program (ACP). The ACP was created by the Infrastructure and Jobs Act of 2021. The ACP provides eligible households with a \$30 discount on monthly broadband internet service. ACP eligibility is based on household income (200 percent of federal poverty or less) or participation in government assistance programs, such as SSI, Medicaid, or WIC. Funding may also be available to provide “discounts” for devices such as laptops, desktop computers, or tablets. Information about the ACP is available online; however, many service providers will inform clients of this program and will also assist clients in applying for benefits.

In November 2022, the City approved a nonexclusive franchise agreement with SiFi Networks (SiFi) to build a high-speed internet open access network using direct fiber optic connections to each Lake Forest property. The new fiber optic system will provide residents with an additional choice for high-speed internet service. The proposed network will provide 10 GB connectivity to homes and 100 GB to businesses and municipal facilities. SiFi offers low-cost internet options for disadvantaged families.

Additionally, the City will continue encouraging developers and property owners to incorporate broadband infrastructure into all new or substantially rehabilitated housing projects, especially affordable housing projects.

**Hazard Mitigation:** The Disaster Mitigation Act of 2000 requires local governments to prepare a plan to document their hazard mitigation planning process and to identify hazards, potential losses, mitigation needs, goals, and strategies. Each state and local government must have a federally approved mitigation plan to be eligible for hazard mitigation grant funding (e.g., FEMA). Lake Forest recently began the development of a Local Hazard Mitigation Plan (LHMP). The LHMP will present strategies for reducing the City's vulnerability to the impacts of events that could threaten lives, property, or the environment. This plan will identify opportunities for the City to become more resilient to hazards and help alleviate risks to the community.

There are three primary elements to the City's LHMP:

1. **Hazard Identification:** Profile potential hazards by type, previous occurrences, and probability.
2. **Vulnerability Assessment:** Identify the potential impact of the hazards profiled, vulnerability to each hazard, and potential loss to life, environment, and economy.
3. **Mitigation Actions:** Develop overarching strategies, specific goals, and actions to reduce hazard impacts.

The City Council is expected to adopt the LHMP in July or August 2024.

## Discussion

HUD-funded grant recipients are required to not discriminate in housing or services directly or indirectly based on race, color, religion, sex, national origin, age, familial status, or disability. Grant recipients such as Lake Forest are required to affirmatively further fair housing by (1) examining and attempting to alleviate housing discrimination within their jurisdiction, (2) promoting fair housing choices for all persons, (3) providing opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, national origin, and other personal or familial attributes, (4) promote housing that is accessible to and usable by persons with disabilities, (5) and comply with the non-discrimination requirements of the Fair Housing Act. HUD encourages jurisdictions to consult with one another and initiate metropolitan-wide area fair housing planning. The **Analysis of Impediments (AI) to Fair Housing Choice** is the primary document for affirmatively furthering fair housing. In addition to identifying impediments, a strategy to overcome barriers must be developed and implemented - accomplishments are reported annually. The City participated in developing the 2020-2024 countywide AI, which the City Council adopted in May 2020. A summary of impediments to fair housing and the action steps the City will take during FY 2024-25 to affirmatively further fair housing are found in Attachment 4.

# Program Specific Requirements

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

### Introduction

The program-specific requirements for the City CDBG program are listed below.

### 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
<b>Total Program Income</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low- and moderate-income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

### Discussion

The City will meet the 70% low- and moderate-income “Overall Benefit” requirement for using CDBG funds in one year – FY 2024-25.

FY 2024-25 CDBG funds will be allocated to the activities listed in section AP-35. Public service activities will be qualified as “limited clientele benefit.” Public facility and infrastructure improvements will be qualified under “low- and moderate-income area benefit” or “limited clientele benefit” (e.g., ADA improvements). Housing Rehabilitation and Neighborhood Pride Paint programs will be available citywide to qualified low- and moderate-income homeowners.

CDBG program income received during FY 2024-25 will be allocated to the City's Housing Rehabilitation Program (Revolving Loan funds). The City does not have surplus funds from urban renewal settlements, nor does the City have grant funds returned to its line of credit. The City will not undertake float-funded activities; therefore, it does not anticipate program income from this type of activity. Finally, the City does not anticipate undertaking urgent need activities during FY 2024-25, nor will it undertake any actions that may result in the involuntary displacement of businesses or residents.

As indicated above, CDBG program income will fund additional housing rehabilitation loans if available. The City anticipates carrying forward \$0 in housing rehabilitation funds for housing activities during FY 2024-25.

## Five-Year and One-Year Summary of Accomplishments

**Grantee Name:** City of Lake Forest

Decent Housing						
Objective: Housing Preservation	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Housing <u>rehabilitation loans and grants</u> to improve or expand the supply of housing affordable to lower-income households	CDBG	2020	Housing Units	8	9	112.5%
		2021	Housing Units	13	16	123.08%
		2022	Housing Units	13	22	169.23%
		2023	Housing Units			
		2024	Housing Units			
		<b>5-Yr Con Plan Goal</b>			<b>40</b>	<b>47</b>
Housing <u>acquisition loans and grants</u> to improve or expand the supply of housing affordable to lower-income households	CDBG	2020	Housing Units	0	0	NA
		2021	Housing Units	1	0	0.00%
		2022	Housing Units	0	0	0.00%
		2023	Housing Units			
		2024	Housing Units			
		<b>5-Yr Con Plan Goal</b>			<b>0</b>	<b>0</b>
Housing Choice Vouchers (Administered by OCHA): Improve or expand the supply of housing affordable to lower-income households	HUD Housing Vouchers	2020	Housing Units	200	192	96.00%
		2021	Housing Units	185	169	91.35%
		2022	Housing Units	170	170	100.00%
		2023	Housing Units			
		2024	Housing Units			
		<b>5-Yr Con Plan Goal</b>			<b>200</b> <small>(Annual Avg)</small>	<b>177</b> <small>(3 Yr Avg)</small>
Suitable Living Environment						
Objective: Public Social Services Objective: Infrastructure and Facility Improvements	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Provide or improve access to <u>public social services</u> for low- and moderate-income persons and persons with special needs	CDBG	2020	Individuals	295	276	93.56%
		2021	Individuals	1,691	2,296	135.78%
		2022	Individuals	1,723	2,310	134.07%
		2023	Individuals			
		2024	Individuals			
		<b>5-Yr Con Plan Goal</b>			<b>8,000</b>	<b>4,882</b>
Improve and expand <u>public infrastructure and facilities</u> that benefit low- and moderate-income neighborhoods and residents	CDBG	2020	Projects	0	0	0.00%
		2021	Projects	6,754	0	0.00%
		2022	Projects	0	5,755	0.00%
		2023	Projects			
		2024	Projects			
		<b>5-Yr Con Plan Goal</b>			<b>7,500</b>	<b>5,755</b>

## Five-Year and One-Year Summary of Accomplishments

Economic Opportunity						
Objective: Economic Opportunities	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
On September 1, 2020, added small business assistance grant for businesses impacted by the Coronavirus ( <u>CDBG-CV funding</u> )	CDBG-CV	2020	Businesses	80	80	100.00%
		2021	Businesses	0	0	0.00%
		2022	Businesses	0	0	0.00%
		2023	Businesses			
		2024	Businesses			
	<b>5-Yr Con Plan Goal</b>					<b>80</b>
Continuum of Care						
Objective: Homeless Continuum of Care	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Provide a continuum of supportive and housing services for the homeless and households at risk of homelessness	CDBG	2020	Individuals	2,375	914	38.48%
		2021	Individuals	861	80	9.29%
		2022	Individuals	1,057	438	41.44%
		2023	Individuals			
		2024	Individuals			
	<b>5-Yr Con Plan Goal</b>				<b>2,680</b>	<b>1,432</b>
Other						
Objective: Administration and Planning	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Provide for administration and planning activities to carry out actions that address needs in the Consolidated Plan, including <u>fair housing services</u> to address local impediments to fair housing <sup>1</sup>	CDBG	2020	Year of Admin	0	0	NA
		2021	Year of Admin	0	0	0.00%
		2022	Year of Admin	75	92	122.67%
		2023	Year of Admin			
		2024	Year of Admin			
	<b>5-Yr Con Plan Goal</b>				<b>450</b>	<b>92</b>
Provide for <u>administration and planning</u> activities to carry out actions that address needs in the Consolidated Plan	CDBG	2020	Households	1	1	100.00%
		2021	Households	1	1	100.00%
		2022	Households	1	1	100.00%
		2023	Households			
		2024	Households			
	<b>5-Yr Con Plan Goal</b>				<b>5</b>	<b>3</b>

1. Fair Housing services were funded as a public service during FY 20-21, FY 21-22 & FY 22-23, and as Admin in FY 23-24 and proposed as Admin for FY 24-25

Saddleback Valley News  
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LAKE FOREST, California 92630

**AFFIDAVIT OF PUBLICATION**

**STATE OF CALIFORNIA**

**County of Orange County**

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 County, State of California, on December 7, 1976, Case No. A-86742 in and for the City of Irvine, County of Orange County, 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:

**04/04/2024**

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: Apr 4, 2024.

  
\_\_\_\_\_  
Signature

**PUBLIC NOTICE  
CITY OF LAKE FOREST  
Community Development Block Grant Program  
2024-2025 Annual Action Plan**

**30-DAY PUBLIC REVIEW AND COMMENT PERIOD  
AND NOTICE OF PUBLIC HEARING**

Notice is hereby given that the City of Lake Forest seeks public input pursuant to the Community Development Block Grant (CDBG) program 2020-2024 Consolidated Plan – Annual Action Plan for Fiscal Year (FY) 2024-2025. The CDBG program's primary objective is to develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities 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.

**FY 2024-2025 Annual Action Plan**

The Consolidated Plan is a five-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. To date, HUD has not announced 2024 grant allocations; however, for planning purposes, the City anticipates receiving \$505,000 in CDBG funds for FY 2024-2025. Program income generated by the repayment of prior funded housing rehabilitation loans and \$90,600 in prior year uncommitted funds will also be available to undertake eligible housing activities. Based on the City's 2024-2025 CDBG allocation, the following activities are proposed:

<b>Program Name</b>	<b>Program Description</b>	<b>Proposed CDBG Funding</b>
Public Facility Improvements/ Housing	Examples: Assisted Pedestrian Signal Pushbuttons and housing rehabilitation loans and grants	\$418,850
Public Services	Examples: Food distribution, health care services, senior services, and homeless services	\$75,750
CDBG Program Administration	Program coordination, management, staffing, monitoring, and reporting; fair housing education and enforcement services	\$101,000

Due to the delay in approving the federal 2024 budget, the City will increase or decrease proposed CDBG funding for activities by a percentage based on the final 2024 CDBG grant.

**Comment Period**

A copy of the draft 2024-2025 Annual Action Plan is available for review on the City website: <https://www.lakeforestca.gov/en/departments/economic-development/housing/community-development-block-grant>. The plan is also available for public review at Lake Forest City Hall, 100 Civic Center Drive, Lake Forest, CA.

Written public comments will be accepted from 4/5/24 through 5/6/24. Written comments should be submitted no later than 5:00 PM May 6, 2024, to:

City of Lake Forest  
Attn: Adrian Grillo  
100 Civic Center  
Lake Forest, CA 92630

The City will respond to all public comments received in writing.

**CITY COUNCIL PUBLIC HEARING**

All interested persons are invited to the public hearing to discuss the draft 2024-2025 Action Plan.

**DATE:** Tuesday, May 7, 2024  
**TIME:** 6:30 PM or soon thereafter  
**LOCATION:** Lake Forest City Hall Council Chambers  
100 Civic Center, Lake Forest, CA, 92630

**Agenda on the Internet:** Meeting agendas are available on the City website at <https://www.lakeforestca.gov/en/agendas>. Specific meeting agendas are accessible on the Friday before a City Council meeting. City Council meetings are also live-streamed on the City website.

**Agenda Document Review:** A full Agenda, including all backup information, is available at City Hall, 100 Civic Center Drive, Lake Forest, California, the Friday before a meeting.

**Agenda Description:** The Agenda descriptions are intended to notify members of the public of a general summary of items of business to be transacted or discussed. The listed Recommended Action represents staff's recommendation. The City Council may

take any action it deems appropriate on the agenda item and is not limited in any way by the recommended action.

**PUBLIC COMMENT PRIOR TO THE MEETING:** Members of the public may submit email comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov). Email comments will be uploaded to the agenda packet and made part of the official public record of the meeting and will not be read at the meeting. To ensure staff reviews all comments prior to the City Council meeting, please submit email comments no later than 5:00 PM the day of the meeting.

**PUBLIC COMMENT:** Members of the public may provide comments in-person at the meeting. Those wishing to provide comments in-person at the meeting will be asked to submit a request to speak to the City Clerk. Members of the public may submit email comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov). Email comments will be uploaded to the agenda packet and made part of the official public record of the meeting and will not be read at the meeting. To ensure staff reviews all comments prior to the City Council meeting, please submit email comments no later than 5:00 p.m. the day of the meeting. 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 Sections 2.50.010 and 2.50.020 of the Lake Forest Municipal Code ("LFMC") and Sections 1094.5 and 1094.6 of the California Code of Civil Procedure. Any action or proceeding to attack, review, set aside, or void any decision of the Lake Forest City Council is controlled by Section 2.50.010 and Section 2.50.020 of the LFMC.

Any such action or proceeding that seeks judicial review of, attacks, or seeks to set aside or void any decision of the Lake Forest City Council shall be limited to those issues raised at the hearing described in this notice 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.

**Saddleback Valley News**

**Published: 4/4/24**

## **SUMMARY OF PUBLIC COMMENTS**

### **30-DAY COMMENT PERIOD (4/5/24 THROUGH 5/6/24)**

No public comments were received during the public comment period.

### **MAY 7, 2024, CITY COUNCIL PUBLIC HEARING**

A representative of Families Forward thanked the City Council for past and continued support and provided a short update on the success of their programs.

**CITY OF LAKE FOREST  
2023 CDBG-Eligible Block Groups**

<b>City</b>	<b>Census Tract</b>	<b>Block Group</b>	<b># Low/Mod Residents</b>	<b>Low/Mod Universe</b>	<b>% Low/Mod</b>
Lake Forest	032014	2	2,440	2,765	88.25%
Lake Forest	032027	1	2,350	3,440	68.31%
Lake Forest	052410	2	420	620	67.74%
Lake Forest	032047	1	610	950	64.21%
Lake Forest	052423	2	1,775	2,860	62.06%
Lake Forest	052416	1	615	995	61.81%
Lake Forest	052410	1	1,035	1,690	61.24%
Lake Forest	052411	2	1,085	1,780	60.96%
Lake Forest	052410	3	1,170	2,010	58.21%
Lake Forest	052424	1	860	1,500	57.33%
Lake Forest	052425	3	770	1,420	54.23%
Lake Forest	052408	1	545	1,035	52.66%

\* HUD 2023 Low/Moderate Income data as of 5/15/23

## ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

August 6, 2020

### REGIONAL PROPOSED AI 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.<sup>1</sup>*

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 of 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 restrictions 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 housing database 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.

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<sup>1</sup>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 opportunities 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 support 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.

**CITY OF LAKE FOREST PROPOSED AI GOALS AND STRATEGIES**

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 the 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 ongoing 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 a 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.

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> _____ <b>* Other (Specify):</b> _____
<b>* 3. Date Received:</b> _____	<b>4. Applicant Identifier:</b> B-24-MC-06-0584	
<b>5a. Federal Entity Identifier:</b> _____	<b>5b. Federal Award Identifier:</b> _____	
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> _____	<b>7. State Application Identifier:</b> _____	
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> CITY OF LAKE FOREST	_____	
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 33-0495169	<b>* c. UEI:</b> PT77Q9PNBJ55	
<b>d. Address:</b>		
<b>* Street1:</b> 100 CIVIC CENTER DRIVE	_____	
<b>Street2:</b>	_____	
<b>* City:</b> LAKE FOREST	_____	
<b>County/Parish:</b> ORANGE	_____	
<b>* State:</b> CA: California	_____	
<b>Province:</b>	_____	
<b>* Country:</b> USA: UNITED STATES	_____	
<b>* Zip / Postal Code:</b> 92630-0000	_____	
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> CITY MANAGER	<b>Division Name:</b> _____	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.	<b>* First Name:</b> Keith	_____
<b>Middle Name:</b> D.	_____	
<b>* Last Name:</b> Neves	_____	
<b>Suffix:</b>	_____	
<b>Title:</b> Assistant City Manager		
<b>Organizational Affiliation:</b> _____		
<b>* Telephone Number:</b> 949-461-3431	<b>Fax Number:</b> _____	
<b>* Email:</b> kneves@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 support housing rehabilitation, low/mod public services, public improvements & program admin within 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.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="518,153.00"/>
* 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="90,600.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="608,753.00"/>

**\* 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

**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 18, 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: 02/28/2025

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.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> 	<p>TITLE</p> <p>City Manager</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Lake Forest</p>	<p>DATE SUBMITTED</p> <p>05/09/2024</p>

**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.

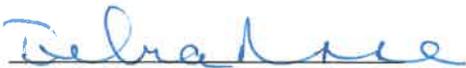
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

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 75.



Signature of Authorized Official

05/09/2024

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) **2024** [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.



Signature of Authorized Official

05/09/2024

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.