



2021-2022

# CDBG Annual Action Plan

Approved May 4, 2021

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# Executive Summary

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

### 1. Introduction

The 2021-2022 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 the City will undertake with its annual CDBG allocation to meet the priority needs identified in the Consolidated Plan. Fiscal Year (FY) 2021-2022 is the second year of the current Consolidated Plan cycle.

HUD has announced funding allocations for FY 2021-2022 - the City will receive \$513,604 in CDBG funds for FY 2021-2022. Additionally, \$203,508 in prior year funds and program income received during the year will 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 in the plan. Corresponding annual accomplishment goals for FY 2021-2022 are also listed below:

- Infrastructure and Facility Improvements: Improve public infrastructure and facilities that benefit 7,500 low- and moderate-income residents. FY 2021-2022 Goal: benefit 13 low- and moderate-income residents
- Affordable Housing: Improve or expand the supply of housing affordable to 40 lower-income households. FY 2021-2022 Goal: Rehab 13 housing units

- Public Services: Provide access to public social services for 8,000 low- and moderate-income persons. FY 2021-2022 Goal: benefit 1,956 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 that are homeless. FY 2021-2022 Goal: benefit 861 low- and moderate-income residents
- Administration and Planning: Provide CDBG program oversight and coordination and fair housing services to 450 households. FY 2021-2022 Goal: No residents assisted (fair housing services funded as a public service)

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

FY 2020-21 (the current fiscal year) is the first year of the City's 2020-2024 Consolidated Plan cycle – most planned activities will be completed by June 30, 2021; consequently, there is no past performance to evaluate for the current Consolidated Plan cycle. The City has consistently met planned goals during past Consolidated Plan cycles.

### **4. Summary of Citizen Participation Process and consultation process**

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

- The City Council held a public hearing on April 20, 2021, to obtain public comments regarding the Annual Action Plan and kick-off its 30-day public review period.
- A draft of the Consolidated Plan was made available for a 30-day public comment period from March 19 to April 19, 2021.
- The Consolidated Plan is scheduled to be adopted by the City Council on May 4, 2021.

### **5. Summary of public comments**

A summary of comments received can be found in **Attachment 1**.

### **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 1**.

### **7. Summary**

The Consolidated Plan is a strategic plan that utilized 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 priority needs. 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 this objective, the City of Lake Forest will utilize \$717,112 in CDBG funds (\$513,604 in 2021 funds plus \$203,508 in prior year funds and anticipated program income) during FY 2021-2022 to carry out a variety of 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.*

| Agency Role        | Name        | Department/Agency    |
|--------------------|-------------|----------------------|
| CDBG Administrator | LAKE FOREST | Development Services |

**Table 1 – Responsible Agencies**

### Narrative (optional)

The Development Services Department is responsible for overseeing the City's CDBG program, including the preparation of 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(l)**

### **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 also are required to 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(l))**

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

- The Community Development Department, acting as the lead agency, met with various City departments and consulted with outside agencies to gain input on annual needs, enhance coordination of services, prevent duplication of services, and resolve issues within the interagency institutional structure.
- The City of Lake Forest collaborates with the County to obtain input on assisted housing programs. Specifically, the City works with and supports the Orange County Housing Authority's (OCHA) administration of the Housing Choice Voucher Program, which provides housing subsidies to qualified lower-income renters. The City's participation enhances coordination as a member of the OCHA Advisory Committee.
- 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 type of services City residents require (e.g., senior services, youth services, services for the near homeless and those already homeless) and develop partnerships with local agencies to ensure the delivery of quality services.
- The City of Lake Forest has an active economic development program that coordinates business activities and employment programs with community organizations such as the Lake Forest Chamber of Commerce and the Orange County One-Stop Center.

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

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

The City participates in the CoC planning process by providing information regarding the activities it will fund to address local homeless issues. 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. The City is also a supporter and participant in the biennial Point-In-Time Survey of the region's homeless.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards 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 is not a recipient of 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>   | Orange County Housing Authority   |
|   | <b>Agency/Group/Organization Type</b>  | PHA   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>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 regarding households on the waitlist for housing assistance  |
| 2 | <b>Agency/Group/Organization</b>   | 211 Orange County   |
|   | <b>Agency/Group/Organization Type</b>  | Regional organization<br>Planning organization  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy<br>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 homeless, and HMIS management   |
| 3 | <b>Agency/Group/Organization</b>   | Fair Housing Council of Orange County   |
|   | <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 - also assisted in developing action steps to address impediments to fair housing |
| 4 | <b>Agency/Group/Organization</b>   | Age Well Senior Services  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Elderly Persons  |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Housing Need Assessment<br>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 seniors  |
| 5 | <b>Agency/Group/Organization</b>   | Families Forward  |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing<br>Services-Homeless   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Families with children<br>Homelessness Strategy<br>Anti-poverty Strategy<br>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>   | Family Assistance Ministry  |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing<br>Services-Homeless   |

|   |  |   |
|---|--|---|
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Anti-poverty Strategy<br>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>   | South County Outreach   |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing<br>Services-Homeless   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Anti-poverty Strategy<br>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>   | Camino Health Center  |
|   | <b>Agency/Group/Organization Type</b>  | Services-Health   |
|   | <b>What section of the Plan was addressed by Consultation?</b>   | Anti-poverty Strategy<br>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>   | Mercy House Transitional Living Centers   |
|   | <b>Agency/Group/Organization Type</b>  | Services - Housing<br>Services-homeless   |

|    |  |   |
|----|--|---|
|    | <b>What section of the Plan was addressed by Consultation?</b>   | Homelessness Strategy<br>Homeless Needs - Chronically homeless<br>Homelessness Needs - Veterans                     |
|    | <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 chronically homeless individuals  |
| 10 | <b>Agency/Group/Organization</b>   | Alzheimer's Orange County   |
|    | <b>Agency/Group/Organization Type</b>  | Services-Elderly Persons  |
|    | <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 |
| 11 | <b>Agency/Group/Organization</b>   | County of Orange  |
|    | <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        |

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

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

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

| <b>Name of Plan</b>                                      | <b>Lead Organization</b>                                  | <b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>  |
|--|---|--|
| Continuum of Care  | 211-Orange County   | Addresses issues pertaining to homelessness, including the 2019 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 goal for the preservation and expansion of the City's housing stock  |
| Capital Improvement Budget                               | City of Lake Forest                                       | Includes a multi-year plan for use CDBG funds for capital projects   |
| Analysis of Impediments to Fair Housing                  | Orange County HUD Grantee Cities and the County of Orange | Countywide document that identifies fair housing impediments within participating cities and outlines a plan to address issues |

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

**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 public hearing before the City Council, which also initiated the 30-day public review of the Action Plan, with the final City Council adoption at a public meeting. The notice for the City Council public hearing and a summary of public comments is provided in **Attachment 1**.

#### 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 21-22  | NA                           | NA   | NA                  |
| 2          | Newspaper Ad      | Non-targeted/broad community | Notice regarding the 30-day public review period (3/19/21 to 4/19/21) and 4/19/21 public hearing | None                         | NA   | NA                  |
| 3          | Public Hearing    | Non-targeted/broad community | 4/20/21 City Council public hearing to review the draft Action Plan and receive public comment   | See <b>Attachment 1</b>      | See <b>Attachment 1</b>                      | NA                  |

| Sort Order | Mode of Outreach | Target of Outreach           | Summary of response/attendance  | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|------------------------------|---|------------------------------|--|---------------------|
| 4          | Public Meeting   | Non-targeted/broad community | 5/4/21 public meeting to approve FY 2021-2022 Action Plan and authorize submission of the plan to HUD | None                         | NA   | NA                  |
| 5          | Public Meeting   | Non-targeted/broad community | 7/6/21 public meeting necessary to allocate additional 2021 CDBG funds due to CDBG formula mistake    | See <b>Attachment 1</b>      | See <b>Attachment 1</b>                      | NA                  |

**Table 4 – Citizen Participation Outreach**

## 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 it will receive \$513,604 in CDBG funds for Fiscal Year 2021-2022. Additional resources for the year include prior year funds totaling \$203,508 and program income received during the fiscal year generated by the repayment of previously funded housing rehabilitation loans. Both amounts also vary from year to year. The City anticipates that the County of Orange will continue to administer the federal rental assistance program in Lake Forest, assisting approximately 185 households per year. The City will continue efforts to leverage CDBG funds with other federal, state, and local funds.

#### Anticipated Resources

| Program | Source of Funds | Uses of Funds  | Expected Amount Available Year 2 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description   |
|---------|-----------------|--|----------------------------------|--------------------|--------------------------|-----------|---|---|
|         |                 |  | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |   |   |
| CDBG    | Public-federal  | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 513,604                          | 0                  | 203,508                  | 717,508   | 1,500,000   | CDBG annual allocation, prior year funds, and projected loan repayments |

Table 5 - Expected Resources – Priority Table

**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 2021, 187 Lake Forest households receive rental assistance. The City anticipates that OCHA will provide rental assistance to 185 Lake Forest households annually over the five-year Consolidated Plan cycle.
- The City does not have an inclusionary housing program; however, the Housing Element indicates the City will encourage developers to include a minimum of 15% affordable units within their housing projects. As an alternative, developers may pay an in-lieu fee instead of constructing affordable units within their development. The City will negotiate an agreement with a developer to ensure units are built or the in-lieu fee is collected.

CDBG does not require matching funds.

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

The City of Lake Forest Housing Authority holds assets formerly held by the Lake Forest Redevelopment Agency, including a tax-defaulted vacant parcel purchased from the County of Orange (Mamie Thomas Parcel). The City continues its efforts to sell the Mamie Thomas Parcel. The City has also continued to work with developers to identify parcels that may be suitable for development. The City has recently approved a 71-unit apartment project for seniors earning less than 60% of the area median income. Twelve units in the project will serve as supportive housing for formerly homeless seniors with special needs. It is anticipated that the project will be completed in 2023.

**Discussion**

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



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e )

#### Goals Summary Information

| Sort Order | Goal Name                                | Start Year | End Year | Category  | Geographic Area            | Needs Addressed                       | Funding         | Goal Outcome Indicator  |
|------------|--|------------|----------|---|----------------------------|---------------------------------------|-----------------|---|
| 1          | Infrastructure and Facility Improvements | 2021       | 2022     | Non-Housing Community Development                           | CDBG Target Areas Citywide | Public Improvements                   | CDBG: \$286,112 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 999 Persons Assisted |
| 2          | Housing Preservation                     | 2021       | 2022     | Affordable Housing  | Citywide                   | Affordable Housing                    | CDBG: \$251,500 | Homeowner Housing Rehabilitated: 13 Household Housing Unit  |
| 3          | Public Social Services                   | 2021       | 2022     | Non-Homeless Special Needs Low & Moderate-income Households | Citywide                   | Public Services                       | CDBG: \$37,250  | Public service activities other than Low/Moderate Income Housing Benefit: 1,956 Persons Assisted                  |
| 4          | Homeless Continuum of Care               | 2021       | 2022     | Homeless  | Citywide                   | Homeless Support Services and Housing | CDBG: \$39,750  | Homeless Person Overnight Shelter: 11 Persons Assisted<br><br>Homelessness Prevention: 850 Persons Assisted       |
| 5          | Program Administration                   | 2021       | 2022     | Administration  | Citywide                   | Administration and Planning           | CDBG: \$102,500 | Other: 1 Other  |

**Table 6 – Goals Summary**

5/4/21  
Revised 7/6/21

Annual Action Plan  
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## Goal Descriptions

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

Table 7 – Goal Descriptions

**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 13 households will be assisted with CDBG-funded housing rehabilitation during FY 2021-2022.

## AP-35 Projects – 91.220(d)

### Introduction

The activities to be undertaken during FY 2021-2022 are summarized below. All activities identified are expected to be completed by June 30, 2022.

| #  | 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 | MOMs OC                           |
| 11 | South County Outreach             |
| 12 | El Toro Park Phase 2 (Park Fence) |
| 13 | ADA Sidewalk Curb Ramps           |

**Table 8 – Project Information**

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

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

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

## 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: \$102,500   |
|          | <b>Description</b>   | CDBG program oversight and coordination   |
|          | <b>Target Date</b>   | 6/30/2022   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | NA  |
|          | <b>Location Description</b>  | Citywide  |
|          | <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: \$226,350 (plus program income received during the year)  |

5/4/21  
Revised 7/6/21

Annual Action Plan  
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|          |  |  |
|----------|--|--|
|          | <b>Description</b>   | Housing rehabilitation loans for owner-occupied housing units      |
|          | <b>Target Date</b>   | 6/30/2022  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 8 low- and moderate-income households                              |
|          | <b>Location Description</b>  | Citywide   |
|          | <b>Planned Activities</b>  | Loans to rehabilitate owner-occupied housing units                 |
| <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: \$25,150   |
|          | <b>Description</b>   | Grants to assist homeowners in painting the exterior of their home |
|          | <b>Target Date</b>   | 6/30/2022  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 5 low- and moderate-income homeowners                              |
|          | <b>Location Description</b>  | Citywide   |
|          | <b>Planned Activities</b>  | Grants to assist homeowners in painting 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: \$7,500   |
|   | <b>Description</b>   | In-home support services for home-bound seniors   |
|   | <b>Target Date</b>   | 6/30/2022   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 16 Seniors and frail elderly  |
|   | <b>Location Description</b>  | Citywide  |
|   | <b>Planned Activities</b>  | Case management and in-home support services 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: \$5,000   |
|   | <b>Description</b>   | Adult day services  |
|   | <b>Target Date</b>   | 6/30/2022   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 25 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: \$12,250  |
|          | <b>Description</b>   | Low-cost medical and pediatric dental services  |
|          | <b>Target Date</b>   | 6/30/2022   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 1,600 Individuals   |
|          | <b>Location Description</b>  | 30300 Camino Capistrano, San Juan Capistrano CA   |
|          | <b>Planned Activities</b>  | Reduced cost medical and pediatric 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>   | Public Social Services  |
|          | <b>Needs Addressed</b>   | Public Services   |
|          | <b>Funding</b>   | CDBG: \$7,500   |
|          | <b>Description</b>   | Fair housing services   |
|          | <b>Target Date</b>   | 6/30/2020   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 265 Individuals (85 households)   |

|          |  |   |
|----------|--|---|
|          | <b>Location Description</b>  | Citywide  |
|          | <b>Planned Activities</b>  | Fair housing outreach, education, enforcement services, and enhanced mediation services due to lifting of eviction moratorium |
| <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: \$12,250  |
|          | <b>Description</b>   | Rapid rehousing and support services for homeless families with children  |
|          | <b>Target Date</b>   | 6/30/2022   |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 11 homeless persons   |
|          | <b>Location Description</b>  | Citywide  |
|          | <b>Planned Activities</b>  | Case management and rapid rehousing housing for homeless families   |
| <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: \$8,250   |
|          | <b>Description</b>   | Rental assistance to help prevent eviction/homelessness   |
|          | <b>Target Date</b>   | 6/30/2022   |



|           |  |   |
|-----------|--|---|
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 238 lower-income individuals at risk of becoming homeless   |
|           | <b>Location Description</b>  | Citywide  |
|           | <b>Planned Activities</b>  | Case management and rental assistance to help lower-income households from becoming homeless  |
| <b>10</b> | <b>Project Name</b>  | <b>MOMs 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: \$5,000   |
|           | <b>Description</b>   | Education and health screening for pregnant women and new mothers and their babies  |
|           | <b>Target Date</b>   | 6/30/2022   |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 50 lower-income individuals   |
|           | <b>Location Description</b>  | Citywide  |
|           | <b>Planned Activities</b>  | Education, infant health and development screening, and parenting education for pregnant women, new mothers, and their babies up to 13 months |
| <b>11</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: \$19,250  |
|           | <b>Description</b>   | Foodbank and case management services for lower-income individuals, individuals at risk of homelessness, and homeless individuals - funds will also be used to prevent evictions and utility shut-off |
|           | <b>Target Date</b>   | 6/30/2022   |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 612 low- and moderate-income persons  |
|           | <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>12</b> | <b>Project Name</b>  | <b>El Toro Park Phase 2 (Park Fence)</b>  |
|           | <b>Target Area</b>   | Low/Mod Area  |
|           | <b>Goals Supported</b>   | Public Improvements and Public Facilities   |
|           | <b>Needs Addressed</b>   | Non-Housing Community Development   |
|           | <b>Funding</b>   | CDBG: \$140,000   |
|           | <b>Description</b>   | Installation of park improvements   |
|           | <b>Target Date</b>   | 6/30/2022   |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 5,755 individuals (benefit to these individuals already counted in Phase 1)   |
|           | <b>Location Description</b>  | 24031 Larkwood, Lake Forest CA - Census Tracts 0320.14 Block Group 1 & 2 (63.86% Low/Mod)   |
|           | <b>Planned Activities</b>  | Replace existing deteriorated fence to provide or enhance public safety   |

|    |  |   |
|----|--|---|
| 13 | <b>Project Name</b>  | <b>ADA Sidewalk Curb Ramps</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: \$146,112   |
|    | <b>Description</b>   | Installation of sidewalk curb ramps that comply with current ADA regulations  |
|    | <b>Target Date</b>   | 6/30/2022   |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | According to HUD data, 1,822 individuals with a disability reside in the project area – per U.S. Census Bureau, 999 individuals with ambulatory difficulty reside in the project area |
|    | <b>Location Description</b>  | City Area 2 – Census Tracts 320.14, 230.27, 524.11, and 524.16  |
|    | <b>Planned Activities</b>  | Installation of up to 16 sidewalk curb ramps that comply with current ADA regulations   |

## 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 2021-2022, CDBG funds will support activities on a citywide basis, that is, for households that are income-eligible or eligible due to a unique characteristic (e.g., adults with disabilities and seniors) regardless of where they live in Lake Forest.

### Geographic Distribution

| Target Area       | Percentage of Funds |
|-------------------|---------------------|
| CDBG Target Areas | 20                  |
| Citywide          | 80                  |

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The City does not explicitly allocate CDBG funds on a geographic basis; instead, funds are allocated to meet lower-income households' needs best regardless of where they reside in the City. The City prioritizes the use of its CDBG funding to preserve housing that is affordable to lower-income households (via rehabilitation), which helps 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, which have a higher percentage of lower-income residents (see **Attachment 3** – map of the City's CDBG eligible areas). Some infrastructure/facility improvement projects may be undertaken in areas outside of Low- and Moderate-Income areas. Such projects are typically limited to those that address ADA regulations.

### Discussion

CDBG funds will fund programs that serve lower-income Lake Forest residents regardless of where they live. For FY 2021-2022, CDBG funds will benefit residents on a citywide basis.

## Affordable Housing

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

#### Introduction

Although the Consolidated Plan and Action Plan focuses on 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.

| One Year Goals for the Number of Households to be Supported |           |
|---|-----------|
| Homeless  | 0         |
| Non-Homeless  | 13        |
| Special-Needs   | 0         |
| <b>Total</b>  | <b>13</b> |

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

| One Year Goals for the Number of Households Supported Through |           |
|---|-----------|
| Rental Assistance   | 0         |
| The Production of New Units                                   | 0         |
| Rehab of Existing Units                                       | 13        |
| Acquisition of Existing Units                                 | 0         |
| <b>Total</b>  | <b>13</b> |

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

#### Discussion

The 2021-2022 Action Plan allocates CDBG public to a local agency that will provide rapid rehousing to an estimated 11 individuals. The City's CDBG-funded affordable housing strategy maintains affordable housing stock through housing rehabilitation programs and supporting rental assistance programs like the Housing Choice Voucher (administered by the OCHA). The City anticipates 13 homeowners will participate in the City's housing rehabilitation program, and 185 Lake Forest renter households will receive rental assistance during FY 2021-2022.

## **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 homeless person's immediate shelter needs and provides access to transitional and permanent housing, support services, and employment opportunities to break the cycle of homelessness.

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

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

The City collaborates and relies on nonprofit partners to reach out to homeless persons (especially unsheltered persons). The City will allocate CDBG funds to three agencies that will provide services for homeless individuals. Each agency has an outreach component used to engage and assess clients. In addition, Mercy House will receive non-CDBG funding in support of its street outreach and engagement program. The Mercy House Street Outreach Team will partner with the OC Sheriff to implement this program.

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

In past years, the City used CDBG funds to assist nonprofits in acquiring eight condominium units located in the community to provide transitional housing. For FY 2021-2022, Families Forward's "Housing Program" is recommended for CDBG funding. This program offers rapid rehousing assistance for up to 11 individuals (i.e., families with children). The City did not receive any requests for emergency shelter programs.

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

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

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

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

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

**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 2021-2022, the City will allocate CDBG funds to Family Assistance Ministry and South County Outreach for various services to assist the near-homeless and those already homeless. These agencies operate food bank programs, which provide an entry point into the regional CoC. Program applicants undergo an assessment by case managers who determine if additional services are needed and make appropriate referrals. These agencies use CDBG resources to assist households at risk of eviction or the termination of utilities due to financial hardships, especially in the post-COVID-19 environment. The City will also continue participating in regional homeless planning efforts, including the OC CoC's Discharge Plan, which aims to prevent individuals from leaving institutions such as jails and hospitals from becoming homeless.

## **Discussion**

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



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

### **Introduction**

The 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 2021-2022 are summarized below.

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

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

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

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

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

The City recognizes that special needs populations face challenges due to low income, the unique conditions they face, and that they are more likely to become homeless due to these factors. Special needs populations often require unique housing and supportive services. The City considers supportive services and housing for special needs populations as a high priority. In FY 2021-22, the City will fund public service agencies that assist underserved populations such as the homeless, seniors, the disabled, and low-income families with children.

### **Actions planned to foster and maintain affordable housing**

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

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

As previously discussed, the Residential Lead-Based Paint (LBP) Hazard Reduction Act of 1992 changed the federal strategy to addressing LBP by emphasizing preventing childhood lead poisoning through housing-based approaches. For example, 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 health dangers of lead and encourage children's screening for elevated blood-lead levels. Additionally, before the use of federal funds, housing units are screened for lead-based paint. Housing units identified with lead-based paint hazards are treated, so the lead-based paint is abated per current federal requirements. The use of lead-based paint is prohibited in newly constructed units.

### **Actions planned to reduce the number of poverty-level families**

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

## **Actions planned to develop institutional structure**

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

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

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

## **Discussion**

HUD-funded grant recipients are required under various laws not to 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: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choices for all persons; (3) provide 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 utilized for this purpose. In addition to identifying impediments, a strategy to overcome barriers must be developed and implemented - accomplishments are reported annually. The City participated in developing a county-wide 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 2021-2022 are found in **Attachment 3**.

## Program Specific Requirements

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

#### Introduction

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

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(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 the use of CDBG funds in the three years of FY 2020, 2021, and 2022.

CDBG funds for FY 2021-2022 will be allocated to activities that are described above. Community service activities will be qualified either as “low- and moderate-income area benefit” or “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 2021-2022 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 2021-2022, nor will it undertake any actions that may result in the involuntary displacement of businesses or residents.

As indicated above, if available, CDBG program income will be made available to fund additional housing rehabilitation loans. The City anticipates carrying forward \$0 in housing rehabilitation funds for housing activities during FY 2021-2022.

## **SUMMARY OF PUBLIC COMMENTS**

### **APRIL 20, 2021 CITY COUNCIL PUBLIC HEARING**

- A representative of Camino Health Center provided a summary of services provided to Lake Forest residents, thank the City Council for past funding, and supported the recommendation for CDBG funding. No City response was necessary.

### **30-DAY COMMENT PERIOD (3/19/21 THROUGH 4/19/21)**

- No public comments were received.

### **MAY 4, 2021 CITY COUNCIL MEETING**

- No public comments were received.

### **JULY 6, 2021 CITY COUNCIL MEETING**

- A City resident expressed concern for the amount of funding allocated to certain activities, such as administration and public facility improvements.

# Saddleback Valley News

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## PROOF OF PUBLICATION

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5190701

LAKE FOREST, CITY OF  
100 CIVIC CENTER DR  
ATTN: FINANCE  
LAKE FOREST, CA 92630

**FILE NO. PN 21-22 AAP 30-day Pub Rev**

### AFFIDAVIT OF PUBLICATION

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

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

**03/18/2021**

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

Executed at Anaheim, Orange County, California, on  
Date: March 18, 2021.



Signature

**PUBLIC NOTICE  
CITY OF LAKE FOREST  
Community Development Block Grant Program  
2021-2022 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 is seeking public input pursuant to the Community Development Block Grant (CDBG) program 2020-2024 Consolidated Plan – Annual Action Plan for Fiscal Year (FY) 2021-22. The primary objective of the CDBG program is the development of viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for persons of low- and moderate-income (those earning 80 percent or less of Orange County's median income). This funding is provided by the U.S. Department of Housing and Urban Development (HUD). The scope of eligible activities established by HUD ranges from public works improvements to housing rehabilitation and social service programs.

The Consolidated Plan is a 5-year strategic plan that identifies priority community needs and projects/programs that may be implemented to meet these needs. The Annual Action Plan outlines the City's proposed use of CDBG funds for a twelve-month period. HUD has notified the City it will receive \$506,145 in CDBG funds from HUD for FY 2021-22. Prior year funds and program income will also be available to undertake eligible activities. Based on the 2021 CDBG allocation from HUD, the following activities are proposed:

| Program Name   | Program Description   | Estimate of Proposed Funding |
|--|---|------------------------------|
| Public Facility Improvements/Housing Rehabilitation/Economic Development | Examples: Sidewalk and street improvements, ADA improvements, Housing Rehabilitation loans and grants, Small-business assistance grants | \$326,445                    |
| Public Services  | Examples: Food distribution, health care services, senior services, and homeless services   | \$77,000                     |
| CDBG Program Administration  | Program coordination, management, staffing, monitoring, and reporting; fair housing education and enforcement services                  | \$102,700                    |

**COMMENT PERIOD**

A copy of the draft 2021-22 Annual Action Plan is available for review at Lake Forest City Hall and on the City's website:  
<http://www.lakeforestca.gov/854/Community-Development-Block-Grant>.

Written public comments will be accepted from 3/19/21 through 4/19/21. Written comments should be submitted, no later than 5:00 PM April 19, 2021, to:

City of Lake Forest  
Attn: Ron Santos - Senior Planner  
100 Civic Center  
Lake Forest, CA 92630

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

**CITY COUNCIL PUBLIC HEARING**

All interested persons are invited to attend the public hearing to discuss the draft 2021-22 Action Plan.

**DATE:** Tuesday, April 20, 2021  
**TIME:** 6:30 PM, or soon thereafter  
**LOCATION:** Lake Forest City Hall Council Chambers  
100 Civic Center, Lake Forest, CA, 92630

**SPECIAL NOTICE REGARDING PUBLIC PARTICIPATION AND COMMENT DURING CORONAVIRUS (COVID-19) PANDEMIC:**

**EXECUTIVE ORDER:** On March 4, 2020, Governor Newsom proclaimed a State Emergency in California as a result of the threat of COVID-19. On March 17, 2020, Governor Newsom issued Executive Order



N-29-20, which allows a local legislative body to hold public meetings via teleconferencing and to make public meetings accessible electronically to all members of the public seeking to observe and address the local legislative body. Pursuant to Executive Order N-29-20, please be advised that the City of Lake Forest City Council may participate at meetings by teleconference.

**PUBLIC PARTICIPATION:** Pursuant to Executive Order N-29-20 and given the current health concerns, members of the public can access meetings live or on our website at [www.lakeforestca.gov](http://www.lakeforestca.gov) or provide public comment as provided below.

**PUBLIC COMMENT PRIOR TO THE MEETING:** Members of the public may submit e-comments to [council@lakeforestca.gov](mailto:council@lakeforestca.gov) or a voicemail message by calling (949) 461-3455. E-comments will not be read at the meeting. If leaving a voicemail message, please indicate the agenda item number. Voicemail messages will be played at the meeting and will be limited to three minutes, per speaker. To ensure staff reviews all comments prior to the City Council meeting, please submit email or voicemail comments no later than 5:00 p.m. the day of the meeting. Email and voicemail comments received after said time will be uploaded to the agenda packet and made part of the official public record of the meeting.

**PUBLIC COMMENT AT THE MEETING:** In order to participate in public comment, please check the state website for Orange County's COVID-19 risk level. Should Orange County's risk level change from the purple tier to the red tier, the City will proceed with opening the Council Chambers for in-person public comment. Should Orange County remain in the purple tier, the Council Chambers will be closed to the public and public participation will be accepted via email and voicemails. Emails may be sent to [council@lakeforestca.gov](mailto:council@lakeforestca.gov) and individuals interested in leaving a voicemail should do so at (949) 461-3455. To check the state website, go to: <https://covid19.ca.gov/safer-economy/> or call the City Clerk's office for assistance at (949) 461-3420.

If the COVID-19 risk level allows the Council Chambers to be open, members of the public may provide in-person, verbal comments for any item during the meeting. Comments for any, and all matters under the subject matter jurisdiction of the legislative body will be taken under the Public Comment section of the meeting. Those wishing to provide such comments will be asked to fill out a speaker card and may be asked to wait outside of the Council Chambers until they are called to speak. City staff may limit the number of individuals allowed in the Council Chambers at one time to speak depending on Orange County's COVID-19 risk level the day of the meeting.

Published Saddleback Valley News March 18, 2021 11448427



## 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 restriction on their property.
4. Review existing zoning policies and explore zoning changes to facilitate the development of affordable housing.
5. Align zoning codes to conform to recent California affordable housing legislation.

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

Strategies:

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

*Goal 3: Increase community integration for persons with disabilities.*

Strategies:

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

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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 opportunity for protected classes.*

**Strategies:**

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

**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 distribution of multi-lingual fair housing literature.
  - c. Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.
  - d. Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.
  - e. Include testing/audits within the scope of work with fair housing provider.

- f. Regularly consult with the City's fair housing contractor on potential strategies for affirmatively furthering fair housing on an on-going basis.
- 3. In cooperation with the Orange County Transportation Authority:
  - a. Provide community education regarding transport services for persons with disabilities.
  - b. Explore bus route options to ensure neighborhoods with concentration of low-income or protected class populations have access to transportation services.
- 4. Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).
- 5. Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.
- 6. Update zoning ordinance to comply with current State law.

**Application for Federal Assistance SF-424**

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

07/07/2021

**4. Applicant Identifier:**

B-21-MC-06-0584

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

CITY OF LAKE FOREST

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

33-0495169

**\* c. Organizational DUNS:**

0519057790000

**d. Address:**

**\* Street1:**

100 CIVIC CENTER DRIVE

**Street2:**

**\* City:**

LAKE FOREST

**County/Parish:**

ORANGE

**\* State:**

CA: California

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

92630-0000

**e. Organizational Unit:**

**Department Name:**

DEVELOPMENT SERVICES

**Division Name:**

PLANNING

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

**Prefix:**

MS

**\* First Name:**

GAYLE

**Middle Name:**

**\* Last Name:**

ACKERMAN

**Suffix:**

**Title:**

DIRECTOR OF COMMUNITY DEVELOPMENT

**Organizational Affiliation:**

**\* Telephone Number:**

949-461-3461

**Fax Number:**

949-461-3512

**\* Email:**

gackerman@lakeforestca.gov

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

HOUSING AND URBAN DEVELOPMENT

### 11. Catalog of Federal Domestic Assistance Number:

14-218

CFDA Title:

COMMUNITY DEVELOPMENT BLOCK GRANT

### \* 12. Funding Opportunity Number:

NA

\* Title:

NA

### 13. Competition Identification Number:

NA

Title:

NA

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

Add Attachment

Delete Attachment

View Attachment

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

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

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

CA-045

\* b. Program/Project

CA-045

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

07/01/2021

\* b. End Date:

06/30/2022

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

|                     |            |
|---------------------|------------|
| * a. Federal        | 513,604.00 |
| * b. Applicant      | 0.00       |
| * c. State          | 0.00       |
| * d. Local          | 0.00       |
| * e. Other          | 203,508.00 |
| * f. Program Income | 0.00       |
| * g. TOTAL          | 717,112.00 |

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:

MS

\* First Name:

DEBRA

Middle Name:

\* Last Name:

ROSE

Suffix:

\* Title:

CITY MANAGER

\* Telephone Number:

949-461-3410

Fax Number:

949-461-3577

\* Email:

drose@lakeforestca.gov

\* Signature of Authorized Representative:

Kathy D. News

\* Date Signed:

07/07/2021



## ASSURANCES - CONSTRUCTION PROGRAMS

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

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


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

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

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

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

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

|  |                              |
|--|------------------------------|
| SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL<br> | TITLE<br>CITY MANAGER        |
| APPLICANT ORGANIZATION<br>CITY OF LAKE FOREST  | DATE SUBMITTED<br>07/07/2021 |

## CERTIFICATIONS

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

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

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

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

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

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

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

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



Signature of Authorized Official

07/07/2021

Date

CITY MANAGER

Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

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

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

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

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

**Excessive Force** -- It has adopted and is enforcing:

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

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

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

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

Keith D. Naves

07/07/2021

Signature of Authorized Official

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.