



AGENDA REPORT

SAN CLEMENTE CITY COUNCIL MEETING
Meeting Date: June 21, 2016

Agenda	<u>7B</u>
Approval	
City	<u>[Signature]</u>
Dept.	<u>[Signature]</u>
Attorney	<u>[Signature]</u>
Finance	<u>[Signature]</u>

Department: Community Development Department

Prepared By: Denise Obrero, Community Outreach Coordinator and
Amber Gregg, Senior Planner

Subject: ***ADOPTION OF THE 2016-19 CONSOLIDATED PLAN AND 2016-2017 ANNUAL ACTION PLAN FOR EXPENDITURES OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS (CDBG).***

Fiscal Impact: Yes. The Consolidated Plan and Annual Action Plan will have a positive fiscal effect by allowing the City to continue utilizing Federal funds to meet housing, infrastructure and social services needs. This adds Community Development Block Grant (CDBG) funds in the amount of \$345,089 to the FY2017 Miscellaneous Grant Fund.

Summary: Staff recommends that City Council approve and adopt the required U.S. Department of Housing and Urban Development (HUD) reports to receive the City's allocated Community Development Block Grant (CDBG) funds. Last fiscal year the City received \$331,406; this fiscal year the City has been awarded \$345,089.

Background: The 2016-2019 Consolidated Plan, and 2016-2017 Annual Action Plan, has been prepared by the City's Community Development Department in order for the City to continue to receive CDBG funds from HUD. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate-income.

HUD requires recipient communities to prepare a Consolidated Plan every three to five years. The 2016-2019 Consolidated Plan will cover the four-year period of FY 2016-2017 through FY 2019-2020. As required by HUD, the Consolidated Plan was prepared utilizing HUD's electronic template. The template includes over 60 community profile and housing market data tables prepopulated with data from HUD; however, since the City recently completed the 2013-2021 Housing Element, data from this document is used to update HUD data.

A key element of the Consolidated Plan is the input of residents and community stakeholders with respect to priority needs and activities to address needs. Staff solicited and received input in a variety of ways:

- Community surveys and public workshops to obtain input during the development of the Housing Element, the City's primary housing policy document, which was obtained between September 2015 and March 2016.
- Contacted local social service providers and county organizations.

- Presented the document at Human Affairs Committee meeting.
- Placed newspaper and webpage notices regarding public meetings/hearings, and the availability of the draft Consolidated Plan for public review and comment.

Discussion: Consolidated Plan

The Consolidated Plan is a required document by HUD that identifies a jurisdiction's overall housing and community development needs, and outlines a three to five-year strategy to address those needs. The primary purpose of the Consolidated Plan is to address the needs of low- and moderate-income persons, households and neighborhoods.

Key findings based on the analysis of Consolidated Plan data include the following:

- Many San Clemente households are paying a significant percentage of their income for housing. Lower income elderly and small households (i.e., 2 to 4 related members) appear to be the most impacted.
- Several service agencies are available to assist the City's lower income households and homeless with safety net programs; however, need often exceeds supply.
- The City has a good mix of housing units type by tenure; however, affordable housing opportunities are limited, especially for lower income households.
- In general, the City's housing and commercial building inventory are in good shape; however, older properties may need rehabilitation to address deferred maintenance.
- City's public infrastructure and facilities are in good condition; however, some public improvements may be missing or require updating, and others may need to comply with current ADA regulations.

The Consolidated Plan outlines an array of goals, outcomes and activities that the City can implement over a four-year period to address some of the needs identified through the needs assessment process. Some of the opportunities and services identified in the plan include:

- Public Infrastructure Improvements
- Public Facility Improvements
- Single and Multi-Family Housing Rehabilitation
- Commercial Rehabilitation
- Homeless Services
- Public Services
- Fair Housing Services
- Affordable Housing Development

For further detail see the Consolidated Plan provided under Attachment 1. It is important to note that the Consolidated Plan has been prepared utilizing HUD's eConPlan Suite. The eConPlan is a new HUD requirement that mandates the Consolidated Plan be prepared utilizing a specific software that consists of several templates, which once completed, will be uploaded and electronically submitted to HUD. The template dictates the content, and to a vast extent the format of the

document, and affords City staff limited opportunities to expand narratives or modify the format.

Action Plan

The Action Plan is an annual report that sets forth specific objectives and strategies to meet the goals outlined in the Consolidated Plan. The Action Plan describes the City’s proposed housing and community development activities for the program year and identifies resources available to fund those activities. To receive CDBG funds directly from HUD, participating jurisdictions must adopt an Annual Action Plan listing eligible community projects.

The proposed 2016-2017 Annual Acton Plan is the first fiscal year of the new Consolidated Plan cycle. The Annual Action Plan, is the City’s one-year expenditure plan for CDBG funds. The City will receive an allocation of \$345,089 in CDBG funds for FY 2016-2017. An additional \$18,000 in program income resources due to repayment of loans will also be available (to fund housing rehabilitation). The Action Plan details the activities the City will undertake with CDBG funds to address housing and community development needs. Funded activities will support the broader goals and objectives identified in the Consolidated Plan.

CDBG funding priorities fall into four different categories: 1) public facilities and improvements, 2) housing and commercial rehabilitation programs, 3) public services, and 4) administration. The following projects will be completed with this years CDBG funds:

Needs Address	Funding	Project Description
Public Improvements	\$129,311	Sidewalk improvements near Las Palmas Elementary School to improve pedestrian school safety and ADA improvements
Housing Rehabilitation	\$93,000	Rehabilitation of six housing units, includes the additional \$18,000 in program income
Public Services	\$51,762	Funds four social service provider that serve San Clemente Residents
Commercial Rehabilitation	\$20,000	Rehabilitation of nine business storefronts
Fair Housing Services (Public Services)	\$4,500	Tenant and Landlord educational seminars required by HUD
Administration	\$64,516	Funds to support staff administration of the grant program
TOTAL	\$363,089	\$345,089 from CDBG plus \$18,000 from income from home rehabilitation program

1. Public Facilities and Improvements

Property owners and residents from the Downtown CDBG target area have discussed with staff on-going traffic issues and expressed safety concerns along the 700 block

of Calle Puente. Since this project is located near Las Palmas Elementary School, the sidewalk project will improve pedestrian school safety. \$129,311 has been allocated from FY2017 CDBG funds.

As an alternate project and back-up plan for the City to spend down the funds, Staff proposes to upgrade and install ADA ramps in the CDBG target areas. Over the next two months, Public Works staff will go out into the field and survey the needs in our low-income target neighborhoods. They will compile a pipeline list for curb ramp improvements and then reanalyze the North Beach Project viability this summer. If Las Palmas project is delayed, then the City has a solid alternate plan to utilize the earmarked CDBG funds.

2. Housing and Commercial Rehabilitation

The City allocated \$93,000 for the Home Rehabilitation Program and \$20,000 for the Commercial Rehabilitation Program. Since 1994 the City has administered the Home Rehabilitation Program loans and since 2004 the City has provided Commercial Facade Rehabilitation Program grants to Downtown business owners. The average home improvement loan was \$18,500 in 2014-15. The average cost of a commercial rehabilitation grant (typically including new signage or awnings, including design), was \$2,000. Applications are accepted year round and projects are ongoing as long as funding is available. Approximately six home rehabilitation projects and nine commercial facade rehabilitation signage projects were completed last year. The City proposes the same number of Home Rehabilitation projects and nine commercial façade projects. To date, 98 signage grant projects have been completed.

3. Public Services and Fair Housing Services

In November 2015, local non-profit organizations were notified of the availability of CDBG public services grant applications via the City's web site, mail, and media outreach. Community Grant applications were received in January 2016 and reviewed by the Social Services Budget Committee in February. The City may allocate 15 percent of the total grant (\$51,762 out of \$345,089), for Public Services. The Social Services Budget Committee recommended funding for the following non-profit organizations in these proportions:

- 1) Camino Health Center - \$18,000
- 2) Age Well Inc. Case Management Program - \$6,000
- 3) Laura's House- Domestic Violence Program - \$10,000
- 4) City Recreation - "Fun on the Run" \$17,762

Fair Housing Seminars, educating landlord as and tenants of property rights, are made available annually to residents. The seminars are required by HUD and the contract cost to provide this service is \$4,500.

4. Administration

The City may allocate up to 20 percent of its grant funds to program administration. Administrative funds pay for a grant to provide fair housing services and staff for the

overall grant management. Staff oversees: the Home Rehabilitation and Downtown Commercial Grant Programs, conducts public outreach and education, administers and monitors the social services grant program, coordinates with the Engineering Division in setting community priorities for the target area sidewalk program, and prepares quarterly reports and manages reimbursement of funds from HUD. A Consultant prepares the mandatory reports and works closely with the Community Outreach Coordinator.

Next Steps

The Consolidated Plan and Action Plan will be reviewed by the City Council on June 21, 2016 for approval. The documents will be submitted to HUD by July 15, 2016 in order to ensure the availability of CDBG funds on August 1, 2016.

Recommended

Action: STAFF RECOMMENDS THAT the City Council take the following actions:

1. Approve and adopt the FY2016-2019 Consolidated Plan
2. Approve and adopt the FY2017 Annual Action Plan for use of Community Development Block Grant (CDBG) Funds.
3. Authorize the City Manager to submit the Consolidated Plan and Action Plan to HUD which will execute the HUD contract.

Attachments:

1. Consolidated Plan
2. Annual Action Plan (this is contained in the Consolidated Plan but is also provided under separate attachment for ease of reference)
3. Comments from Human Affairs Committee meeting of June 8, 2016

Notification: The Sun Post News 8th page ad.



CITY OF SAN CLEMENTE

2016-2019 Consolidated Plan and

2016-2017 Annual Action Plan

Draft

June 5, 2016

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Map

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- C. Summary of 2013-2021 Housing Element Public Input and Public Comments
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I. Executive Summary

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

1. Introduction

The 2016-2019 Consolidated Plan for the City of San Clemente satisfies federal requirements to receive Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate-income.

CDBG funds are allocated on a formula basis to over 1,200 local governments and States. The formula for the allocation of CDBG is based on variables including current population, projected population growth, age of housing stock, and poverty rate. Each activity to be 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
- Meet a community development need having a particular urgency

HUD requires recipient communities to prepare a Consolidated Plan every three to five years. The current Consolidated Plan for the City was prepared in 2013. The 2016-2019 Consolidated Plan, will cover the four-year period of Fiscal Year 2016-2017 through Fiscal Year 2019-2020. The Community Development Department is the City's lead agency for preparing the Consolidated Plan.

It is important to note that the Consolidated Plan has been prepared utilizing HUD's **eConPlan Suite**. The software suite consists of several templates, which once completed, will be uploaded and electronically submitted to HUD. The Consolidated Plan template dictates the content of the document and affords City staff limited opportunities to expand narratives or modify the format. The template also includes over 60 community profile and housing market data tables. The vast majority of tables are prepopulated with data from the U.S. Census Bureau, mainly data from the 2008–2012 American Community Survey (ACS). To a lesser degree, data from HUD's Comprehensive Housing Affordability Strategy (CHAS) is also utilized. (The CHAS is a special computation of housing and income data generated by the Census Bureau on behalf of HUD). Since the City recently completed the 2013-2021 Housing Element, whenever possible, data from this document is used to supplement HUD-provided data.

Key findings based on the analysis of Consolidated Plan data include the following:

- Many San Clemente households are paying a significant percentage of their income for housing. Lower income elderly and small households (i.e., 2 to 4 related members) appear to be the most impacted.
- Several service agencies are available to assist the City's lower income households and homeless with safety net programs; however, need often exceeds supply.
- The City has a good mix of housing units type by tenure; however, affordable housing opportunities are limited, especially for lower income households.
- In general, the City's housing and commercial building inventory are in good shape; however, older properties may need rehabilitation to address deferred maintenance.
- City's public infrastructure and facilities are in good condition; however, some public improvements may be missing or require updating, and others may need to comply with current ADA regulations.

The Consolidated Plan outlines an array of goals, outcomes and activities that the City can implement over a four-year period to address some of the needs identified through the needs assessment process. The Action Plan is the City's one-year expenditure plan for CDBG funds. HUD has notified the City that it will receive an allocation of \$345,089 in CDBG funds for Fiscal Year (FY) 2016-2017. The City has identified an additional \$18,000 in CDBG program income resources that will also be available to fund eligible housing rehabilitation activities. The Action Plan details the specific activities the City will undertake with CDBG funds to address the housing and community needs of the community. Planned activities include sidewalk improvements, housing and commercial property rehabilitation, public services and program administration (including fair housing services). Funded activities will support the broader goals and objectives identified in the Consolidated Plan.

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

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

- **Public Infrastructure Improvements:** Identified as a high priority need, it is estimated that 10,000 City residents will benefit from installation or rehabilitation of streets and sidewalks or other public infrastructure improvements.
- **Public Facility Improvements:** Identified as a high priority need, it is estimated that 5,000 City residents will benefit from the rehabilitation and/or construction of facilities such as community centers, parks, and other public facilities.
- **Single and Multi-Family Housing Rehabilitation:** An estimated 20 owner-occupied and 4 rental units will be rehabilitated with City program resources. Housing rehabilitation is identified as a high need.
- **Commercial Rehabilitation:** An estimated 20 business will benefit from funds to improve exterior facades and business signs. This activity is identified as a high need.
- **Homeless Services:** An estimated 25 homeless individuals will be assisted with shelter and/or support services. Note: presently, these services are funded with City general funds; however, it

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is conceivable that in future years CDBG may be allocated toward such services; therefore, this activity is identified as a high need.

- **Public Services:** An estimated 10,000 San Clemente residents are projected to be assisted with a variety of social service programs. Populations to be served include seniors, youth, victims of domestic violence, and lower income persons in general. These activities are identified as a high need.
- **Fair Housing Services:** Services to address impediments to fair housing choice. An estimated 500 households will benefit from this high need CDBG-funded activity.
- **Program Administration:** CDBG program oversight and coordinate. Considered a high need.
- **Affordable Housing Development:** Funding for pre-development cost or off-site improvements tied directly to the construction new affordable housing. Because the use of CDBG funds for construction of new housing is severely limited, this activity is listed as a low need.

3. Evaluation of past performance

At the time of the preparation of the 2016-2019 Consolidated Plan, the City of San Clemente has partially completed the third year of the 2013-2017 Consolidated Plan cycle. During the first two years of the current Consolidated Plan cycle, the City has provided CDBG funding for social service programs, housing rehabilitation, commercial rehabilitation, and public facility improvements (e.g., installation of missing sidewalks and installation of ADA-compliant public improvements).

4. Summary of citizen participation process and consultation process

A key element of the Consolidated Plan is the input of residents and community stakeholders with respect to priority needs and activities to address needs. The City encouraged resident participation in a variety of ways:

- Community surveys and public workshops to obtain input during the development of the Housing Element, the City's primary housing policy document.
- Input of community residents via the Human Affairs Committee and City Council meetings.
- Newspaper and webpage notices regarding public meetings/hearings, and the availability of the draft Consolidated Plan for public review and comment.

5. Summary of public comments

[To be updated at the end of the public review period]

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

[To be updated at the end of the public review period]

7. Summary

The 2016-2019 Consolidated Plan has been prepared by the City's Community Development Department in order for the City to continue to receive CDBG funds from HUD. The primary objective of the CDBG program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate-income. Additionally, each activity to be funded with CDBG funds must meet one of the three national objectives.

HUD requires recipient communities to prepare a Consolidated Plan every three to five years. The 2016-2019 Consolidated Plan will cover the four-year period of FY 2016-2017 through FY 2019-2020. As required by HUD, the Consolidated Plan was prepared utilizing HUD's electronic template. The template includes over 60 community profile and housing market data tables prepopulated with data from HUD; however, since the City recently completed the 2013-2021 Housing Element, data from this document is used to update HUD data.

The 2016-2017 Annual Action Plan is the first fiscal year of the new Consolidated Plan cycle. The Annual Action Plan, is the City's one-year expenditure plan for CDBG funds. The City will receive an allocation of \$345,089 in CDBG funds for FY 2016-2017. An additional \$18,000 in program income resources will also be available (to fund housing rehabilitation). The Action Plan details the activities the City will undertake with CDBG funds to address housing and community development needs. Funded activities will support the broader goals and objectives identified within the Consolidated Plan.

II. The Process

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

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

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

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	SAN CLEMENTE	Community Development

Narrative

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

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.200(b), 91.215(I)

1. Introduction

Pursuant to HUD regulations, the City took several action steps to obtain the input of community residents and stakeholders to develop the Consolidated Plan and the 2016-2017 Action Plan. Consultation efforts included workshops and hearings held for the preparation of the City's Housing Element. The City's Human Affairs Committee held meetings to assess the social service needs of residents and to receive additional input on the Consolidated Plan and Annual Plan. The City also consulted with State and regional agencies, in addition to special districts and neighboring communities. Finally, the City utilized its internet webpage and the local community newspaper to notify residents of the opportunity to review and comment on the draft 2016-2019 Consolidated Plan and 2016-2017 Action Plan.

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

The City of San Clemente works closely with the County of Orange Housing Authority (OCHA) to assist renter households with housing vouchers and certificates. As housing development evolves, City staff works closely with developers to identify opportunities to create new housing for lower income residents. In the past these efforts have involved coordination of multiple funding sources via the State and the County of Orange.

Additionally, through its annual CDBG Public Service Grants and General Fund Community Service Grants funding process, City staff is able to ascertain the type of services City residents require (e.g., senior services, youth services, services to assist households at risk of becoming homeless and those already homeless), and develop partnerships with local agencies to ensure the delivery of quality services.

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

As a participant in the Orange County Continuum of Care (OC-CoC) planning process, the City provides information to the OC-CoC regarding the activities it will fund to address local homeless issues. This information is used by the OC-CoC to prepare the regional application to HUD for Homeless Assistance Grant funds. As needed, City staff will expedite certifications of consistency with the Consolidated Plan and other forms of support for the OC-CoC.

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

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

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

Table 2 – Agencies, Groups, Organizations Who Participated

1	Agency/Group/Organization	Fair Housing Foundation
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Impediments to Fair Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provided data and information which helped identify the needs of lower income families and individuals requiring fair housing services. Also provided consultation of City's strategy to address impediments to fair housing.
2	Agency/Group/Organization	211 Orange County
	Agency/Group/Organization Type	Services-homeless Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth HMIS
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Regional Continuum of Care coordinator and HMIS administrator. Provided significant information regarding regional homeless population and shelter resources.

3	Agency/Group/Organization	State of California
	Agency/Group/Organization Type	Health Agency Other government – State
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Economic Development Market Analysis Demographics
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various State departments and agencies were consulted to obtain information regarding employment, demographics, and lead poisoning.
4	Agency/Group/Organization	Orange County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided information regarding number and type of households receiving rental assistance and also the number of households requesting housing assistance.
5	Agency/Group/Organization	San Clemente
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various city departments, committees, and City Council provided a variety of data and information. Also played a key role in identifying priorities and recommendation for the allocation of HUD funds.

6	Agency/Group/Organization	Family Assistance Ministries
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Helped identify housing and service needs of persons at risk of becoming homeless and those already homeless.
7	Agency/Group/Organization	Laura's House
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency helped identify the needs of homeless women and women with children including victims of domestic violence.
8	Agency/Group/Organization	Camino Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency helped identify medical and dental needs of lower income persons and households.
9	Agency/Group/Organization	Age Well Senior Services
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency helped identify needs of senior and frail elder persons and households.

10	Agency/Group/Organization	St. Joseph Health, Mission Hospital
	Agency/Group/Organization Type	Services - Health
	What section of the Plan was addressed by Consultation?	Non-homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency provided community data and social services information which helped identify the needs of lower income families and individuals requiring public services.

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

The City made an effort to have an open consultation process. No agency was knowingly not consulted.

Table 3 – Other Local/Regional/State/Federal Planning Efforts Considered When Preparing The Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Orange County 211	Helped City establish program goals to address need of the San Clemente homeless. Includes regional point in time survey, 10-Year Plan to End Homelessness (including Discharge Plan).
City of San Clemente 2013-2021 Housing Element	City of San Clemente	Provided housing priorities and program goals. The City also made an effort to ensure the Housing Element and Consolidated Plan are consistent.
City of San Clemente Capital Improvement Plan	City of San Clemente	Helped to identify priority capital projects that may be in CDBG-eligible areas.
5 Yr & 1 Yr PHA Plan	Orange County Housing Authority	Identified OCHA resources to address housing needs of lower income renter householders in the City.
Analysis of Impediments to Fair Housing	16 Orange County HUD Grantee Cities	Multi-jurisdictional document identified fair housing impediments within participating cities and outlined plan to address issues.

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

The California Department of Health was consulted to obtain information regarding elevated lead blood levels in children as part of the City’s assessment of lead-based paint hazards. State agencies were also

consulted to obtain updated housing and population information. The County of Orange was contacted to obtain an array of data including information regarding the number of households receiving rental assistance, homeless count, and other regional plans. Local governments also assisted the City with preparation of the Consolidated Plan. As the current recipient of Housing Opportunities for Persons with AIDS (HOPWA) funds, the City of Anaheim was consulted regarding the number of San Clemente residents living with HIV and AIDS, and available HOPWA program resources. The City also participated in roundtable meetings with other Orange County CDBG recipients to discuss the preparation of a regional analysis of impediments to fair housing and other regional housing and community needs.

PR-15 Citizen Participation

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City implemented the following efforts in an effort to obtain a broad range of resident input during the preparation of the Consolidated Plan and Action Plan.

Public Workshops: A key document utilized in preparation of the Consolidated Plan is the City's current Housing Element. The Housing Element is the primary policy document that identifies the strategies and programs that focus on:

- Conserving and improving existing affordable housing
- Providing adequate housing sites
- Assisting in the development of affordable housing
- Removing constraints to housing development
- Promoting equal housing opportunities

Focus Group Public Hearings: Consistent with HUD's regulations, the City also utilized a focus group in the form of an existing City committee to obtain input on priority needs and to also make recommendations on the allocation of limited CDBG resources. Specifically, the Human Affairs Committee held a public meeting on June 8, 2016, at which time Committee members provided input on housing, public service, and other community needs. The Committee also accepted public testimony from residents and the public in general regarding community needs. Finally, the City Council held a public hearing at a regularly noticed and scheduled meeting (June 21, 2016) to obtain public input on the draft Consolidated Plan and the proposed allocation of 2016-2017 CDBG funds.

Notices/Website: Public notices were published in local newspapers of general circulation. Additionally, the draft Consolidated Plan and Action Plan was posted on the City's website for public review and comment, and hard copies were made available during the required 30-day public comment period (see **Attachment A**).

Table 4 – Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL If applicable
1	Housing Needs Survey	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Online survey to solicit input on housing needs and housing programs - August 2015 to November 2015	143 surveys were collected - 61% self-identified as homeowners. See Summary of Public Participation Attachment B	NA	NA
2	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	Housing Element Community Workshops - September 23, 2015 and September 24, 2015. 25 individuals signed Sign-In Sheets	See Public Participation Attachment C	All comments received by the City received a response - see Public Participation Attachment B.	NA
3	Public Meeting	Non-targeted/ broad community	City of San Clemente Human Affairs Committee – 7-members. June 8, 2016	Committee received overview of 2016-2019 Consolidated Plan and planning process.	TBD	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	Newspaper Ad	Non-targeted/ broad community	Notice of 30-day public review period (May 27, 2016 to June 27, 2016) and June 21, 2016 public hearing	TBD	TBD	NA
5	Public Hearing	Non-targeted/ broad community	June 21, 2016 public hearing	TBD	TBD	NA

III. Needs Assessment

NA-05 Overview

Needs Assessment Overview

HUD provided the City with extensive data in order to assess the housing needs of San Clemente residents. By default, this data is based on the Five-Year American Community Survey (ACS) data for 2008-2012, which is generated by the U.S. Census Bureau. To the extent that data is available, updated information is provided.

The needs to be assessed in this section of the Consolidated Plan include the following:

- Household demographics including population, number of households, the number of households experiencing “housing problems,” such as housing cost burden and crowding.
- The extent to which housing problems are experienced disproportionately by one or more racial or ethnic groups.
- Public housing – **NOTE THE CITY OF SAN CLEMENTE DOES NOT OWN OR MANAGE PUBLIC HOUSING.**
- An assessment of homeless needs, including an estimated number of sheltered and unsheltered individuals.
- The City’s “Non-housing Community Development Needs,” that is public facility, infrastructure, and social service needs.

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

1. Lack of a complete kitchen facility
2. Lack of complete plumbing facilities
3. Cost burdened: More than 30% of a household’s total gross income is spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

Severely Cost Burden: More than 50% of a household’s total gross income is spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.
4. Overcrowded: Defined as a housing unit with more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

Severely Overcrowded: Defined as housing with more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

HUD data also characterizes households by types:

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

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

Finally, HUD categorizes households by income:

- Extremely low-income – Household with an income equal to 0% to 30% of the *Area Median Income (AMI)* or *HUD Area Median Family Income (HAMFI)*
- Very low-income – Households with an income equal to 30% to 50% of the AMI or HAMFI
- Low-income – Household with an income equal to 50% to 80% of the AMI or HAMFI
- Low and moderate-income – a household with an income less than 80% of AMI or HAMFI
- Moderate-income – a household with income equal to 80% to 100% of AMI or HAMFI

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

Summary of Housing Needs

During the past two decades, San Clemente has experienced rapid population growth. According to U.S. Census Bureau data presented in **Table 5** below, the City's population grew by 27% between 2000 and 2012. The number of households in the City, however, has not grown as quickly, with only 17% growth from 2000 to 2012. As a result, San Clemente's average household size grew from 2.42 persons in 2000 to 2.63 persons in 2012.

San Clemente's median household income grew significantly during this period, rising by 3% to more than \$87,000 in 2012 compared to just more than \$63,500 in 2000. Household incomes in San Clemente are generally higher than other nearby areas. For example, in comparison, the Orange County median income for 2012 was \$74,163, or approximately 18% less than San Clemente.

Table 5 - Housing Needs Assessment Demographics

Demographics	Base Year: 2000	Most Recent Year: 2012	% Change
Population	49,936	63,187	27%
Households	20,653	24,069	17%
Median Income	\$63,507.00	\$87,184.00	37%

Data Source: 2000 Census (Base Year), 2008-2012 ACS (Most Recent Year)

UPDATED INFORMATION:

A search of current data found that the California Department of Finance estimates San Clemente January 1, 2016 population at 66,245. This State agency also estimates there are 26,143 San Clemente households. The 2010-2014 American Community Survey 5-Year Estimates approximates San Clemente's median income at \$91,749.

Table 6 - Total Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	2,560	2,605	3,830	2,315	12,760
Small Family Households *	865	980	1,370	870	6,880
Large Family Households *	230	165	355	170	1,120
Household contains at least one person 62-74 years of age	505	530	690	690	2,230
Household contains at least one-person age 75 or older	509	480	495	240	865
Households with one or more children 6 years old or younger *	480	235	645	315	2,165

* The highest income category for these family types is >80% HAMFI

Data Source: 2008-2012 CHAS

Housing Needs Summary Tables

Table 7 – Housing Problems #1: Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	110	35	35	0	180	110	0	0	10	120
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	125	45	135	0	305	0	0	0	10	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	50	85	130	45	310	55	0	20	15	90
Housing cost burden greater than 50% of income (and none of the above problems)	915	945	245	19	2,124	815	565	1,045	410	2,835
Housing cost burden greater than 30% of income (and none of the above problems)	40	280	834	365	1,519	95	195	315	550	1,155
Zero/negative Income (and none of the above problems)	65	0	0	0	65	75	0	0	0	75

Data Source: 2008-2012 CHAS

Table 8 – Housing Problems #2: Households with one or more Severe Housing Problems (Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,200	1,110	550	70	2,930	870	1,200	1,065	450	3,585
Having none of four housing problems	140	355	1,400	815	2,710	215	575	810	980	2,580
Household has negative income, but none of the other housing problems	65	0	0	0	65	75	0	0	0	75

Data Source: 2008-2012 CHAS

Table 9 – Housing Problems #3: Cost Burden (Greater than 30%)

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	435	605	418	1,458	250	315	610	1,175
Large Related	140	135	110	385	90	20	120	230
Elderly	270	215	195	680	445	345	390	1,180
Other	310	425	435	1,170	155	75	255	485
Total need by income	1,155	1,380	1,158	3,693	940	755	1,375	3,070

Data Source: 2008-2012 CHAS

Table 10 – Housing Problems #4: Cost Burden (Greater than 50%)

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	425	435	104	964	220	285	540	1,045
Large Related	115	65	30	210	30	20	60	110
Elderly	260	160	80	500	385	205	215	805
Other	295	375	45	715	155	55	235	445
Total need by income	1,095	1,035	259	2,389	790	565	1,050	2,405

Data Source: 2008-2012 CHAS

Table 11 – Housing Problems #5.1: Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	175	100	265	45	585	30	0	20	15	65
Multiple, unrelated family households	0	30	0	0	30	25	0	0	10	35
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	175	130	265	45	615	55	0	20	25	100

Data Source: 2008-2012 CHAS

Table 12 – Housing Problems #5.2: Crowding Information

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

Data Source Comments: No data available.

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

Data provided by HUD’s Consolidated Plan template does not provide a breakdown of single person households in need of housing assistance; however, the City’s Housing Element does provide information regarding single person households (see **Attachment D**). In San Clemente, according to the Housing Element, there are a total of 5,184 one-person households, or 21.7% of total households.

According to the Census Bureau (2010-2014 ACS estimates), there are 5,724 one-person households in San Clemente - approximately 64.6% of these households are owners and 35.4% are renters. Census data also indicates that 42.2% of all owner households and 56.0% of renter households are paying more than 30% of income for housing. Assuming the latter percentages are reflective of single person households, it is estimated that 1,560 owner and 1,135 renter single person households are experiencing a housing cost burden.

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

Regarding disabled San Clemente residents, the 2009-2013 ACS approximates that 7.6% of the City population had one or more disabilities. Federal laws define a person with a disability as, "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a

record of such impairment; or is regarded as having such impairment.” In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limit one or more major life activities. Major life activities include walking, talking, and hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself. According to the City’s Housing Element, of those disabilities tallied for San Clemente between 2009 and 2013, cognitive, ambulatory, and independent living disabilities were the most prevalent. The elderly population had a significantly larger percentage of all disability types.

The elderly population had the most significant levels of disabilities. In San Clemente, 25% of seniors, 65 years of age and over, had one or more disability. The number of seniors with at least one disability is expected to grow substantially over the course of the next 20 years. Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow considerably commensurate with senior population growth.

With respect to victims of domestic violence in San Clemente, according to the State of California, Department of Justice, Office of the Attorney General, in 2014 there were 205 total phone calls requesting assistance related to domestic violence.

What are the most common housing problems?

While some housing units in the City have incomplete kitchen/plumbing facilities, and may be overcrowded (as defined by HUD), based on a review of HUD data (**Table 9 and 10**), the most prevalent housing problem in San Clemente is high housing costs. Findings include the following:

- Among extremely low-income renters, small related households are the most impacted by housing cost burden, and are also the most impacted by severe housing cost burden.
- Among extremely low-income homeowners, elderly households are the most impacted by housing cost burden, and are also most impacted by severe housing cost burden.
- Among very low-income renters, small related households are the most impacted by housing cost burden, and are also most impacted by severe housing cost burden.
- Among very low-income homeowners, elderly households are the most impacted by housing cost burden, and small related households are most impacted by severe housing cost burden.
- Among low-income renters, “other” households are the most impacted by housing cost burden, and small related households most impacted by severe housing cost burden.
- Among low-income homeowners, small related households are the most impacted by housing cost burden, and are also most impacted by severe housing cost burden.

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

In general, HUD data indicates that there are several San Clemente households within all income categories and types experiencing a housing problem – mainly housing cost. As summarized above, HUD’s data shows that lower income small related and elderly households tend to pay more for housing than other household types.

Other housing problems such as overcrowding and severe overcrowding are not widespread City issues. HUD data indicates only 100 total owner households are in these categories, while 615 total renter households (covering all income groups) are overcrowded and severely overcrowded. In total, less than 4% of all households are overcrowded (see **Attachment E**).

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The National Alliance to End Homelessness states that households at risk of homelessness are often on a fixed income (such as some retired seniors) or marginally employed. Due to limited income and high area housing costs, at risk households are typically severely cost burdened. According to the City’s Housing Element, there were 2,555 extremely low-income households in San Clemente (see **Attachment F**). Out of these households, approximately 34% (860) were small family and 9% (225) were large families. Another 35% (905) of these extremely low-income households were seniors.

OCHA reports there are 157 households with children on their waitlist for rental assistance – 24 of these families indicated they are homeless. OCHA also reports that 102 senior households are on the housing assistance waitlist – eight are reported as homeless. OCHA data supports the finding that many extremely low-income families are at risk of becoming homeless, and that many extremely low-income seniors may also be at risk of homelessness.

The City of San Clemente does not receive Emergency Solutions Grant (ESG) funds or other HUD funding that may be used for rapid re-housing; therefore, the City does not have information regarding formerly homeless families and individuals receiving rapid re-housing assistance that may be nearing the termination of assistance.

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

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

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

The origins of involuntary homelessness are primarily rooted in economic factors. As indicated previously, households with extremely low incomes and severe housing cost burden have the highest risk of becoming homeless.

Discussion

Based on **Table 7**, there were 915 renter households and 815 owner households that were in the extreme low-income category that paid over half of their incomes on housing. In addition, there were 945 renter households and 565 owner households that were in the very low-income category that paid over half of their incomes on housing. These households totaled 3,240, or approximately 13% of total households. With other “housing problems” can be found in the City, they are not at levels equal to housing costs.

Households with extremely low-incomes, combined with severe housing cost burden, are the most at risk at becoming homeless. Based on HUD data, the households that are in danger of being homeless are seniors or small families.

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

The need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Per HUD, a “disproportionately greater need” exists when the members of a racial or ethnic group at a given income level experience housing problems at a rate at least 10% points greater than that same racial or ethnic group as a whole.

Example - Hispanics/Latinos comprise 16.8% of San Clemente’s total population; therefore, the “disproportionality” need threshold for any Hispanic/Latino income group or cohort is 26.8%. If the cohort of Hispanics/Latinos with extremely low-income totaled 32.3%, it would be considered to have a “disproportionately greater” housing need as it exceeds the disproportionate threshold by 5.5%.

The **four housing problems** are:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. More than one person per room, not including bathrooms, porches, foyers, halls or half-rooms, or
4. Cost burden greater than 30%

The following tables identify the number and extent of housing problems by income level and by race/ethnicity (based on HUD-provided data).

Table 13 - Disproportionally Greater Need: 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,200	220	140
White	1,565	205	130
Black / African American	15	0	0
Asian	165	0	10
American Indian, Alaska Native	19	0	0
Pacific Islander	0	0	0
Hispanic	375	15	0

Data Source: 2008-2012 CHAS

Table 14 - Disproportionally Greater Need: 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,150	455	0
White	1,650	405	0
Black / African American	0	0	0
Asian	25	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	440	20	0

Data Source: 2008-2012 CHAS

Table 15 - Disproportionally Greater Need: 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,765	1,060	0
White	2,215	930	0
Black / African American	0	0	0
Asian	94	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	15	0	0
Hispanic	409	100	0

Data Source: 2008-2012 CHAS

Table 16 - Disproportionally Greater Need: 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,435	880	0
White	1,180	770	0
Black / African American	15	0	0
Asian	25	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	175	85	0

Data Source: 2008-2012 CHAS

Discussion

The ethnic and racial composition of San Clemente consists primarily of White/Non-Hispanics, Hispanics, Asians and African Americans. According to Census figures used in the current San Clemente Housing Element (**Attachment G**), the City has the following racial and ethnic composition:

- Non-Hispanic White - 76.0%
- Hispanic - 16.8%
- Asian-Pacific Islander - 3.7%
- African American - 0.5%
- Native American - 0.3%
- Other/Two or more races - 2.6%

Based on race/ethnicity data for San Clemente, and data from **Table 13** through **Table 16**, it is apparent that no one racial or ethnic population is experiencing a disproportionately greater housing need. This data is further detailed in **Attachment H**.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205

(b)(2)

The need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As outlined in the previous section, a “disproportionately greater need” defined by HUD exists when the members of racial or ethnic group at a given category of need experience housing problems at a greater rate (10% points or more) than the income level as a whole.

The four **severe housing problems** include:

1. Lacks complete kitchen facilities
2. Lacks complete plumbing facilities
3. Overcrowded households with more than 1.5 persons per room, not including bathrooms, porches, foyers, halls or half-rooms, or
4. Households with cost burdens more than 50% of income.

The following tables identify the number and extent of housing problems by income level and by race/ethnicity (based on HUD-provided data).

Table 17 – Severe Housing Problems: 0%-30% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,070	355	140
White	1,465	305	130
Black / African American	15	0	0
Asian	160	4	10
American Indian, Alaska Native	19	0	0
Pacific Islander	0	0	0
Hispanic	365	25	0

Data Source: 2008-2012 CHAS

Table 18 – Severe Housing Problems: 30%-50% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,675	930	0
White	1,300	755	0
Black / African American	0	0	0
Asian	25	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	335	125	0

Data Source: 2008-2012 CHAS

Table 19 – Severe Housing Problems: 50%-80% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,615	2,210	0
White	1,185	1,960	0
Black / African American	0	0	0
Asian	69	60	0
American Indian, Alaska Native	0	0	0
Pacific Islander	15	0	0
Hispanic	320	194	0

Data Source: 2008-2012 CHAS

Table 20 – Severe Housing Problems: 80%-100% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	520	1,795	0
White	375	1,575	0
Black / African American	15	0	0
Asian	25	0	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	100	160	0

Data Source: 2008-2012 CHAS

Discussion

As previously outlined, the ethnic and racial composition of San Clemente consists primarily of White/Non-Hispanics, Hispanics, Asians and African Americans. Based on Census race/ethnicity data and data from **Tables 17 to 20**, it is apparent that no one racial or ethnic population is experiencing a disproportionately greater severe housing need. This data is further detailed in **Attachment H**.

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

The need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

As outlined in the previous sections, a “disproportionately greater need” (as defined by HUD) exists when the members of racial or ethnic group at a given income category experience housing problems at a greater rate (i.e., 10% points) than the income level as a whole. The previous tables evaluated disproportionality for all four housing problems by income and race/ethnicity. **Table 21** provides HUD data solely regarding housing cost burden.

Table 21 – Greater Need: Housing Cost Burdens by Area Median Income

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	12,635	5,400	5,840	185
White	10,595	4,570	4,690	130
Black / African American	34	15	15	0
Asian	525	160	169	55
American Indian, Alaska Native	35	0	19	0
Pacific Islander	20	0	15	0
Hispanic	1,285	535	800	0

Data Source: 2008-2012 CHAS

Discussion:

Based on the data provided by HUD on **Table 21**, it is apparent that no one racial or ethnic population is experiencing a disproportionately greater housing cost burden. This data is further detailed in **Attachment H**.

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

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

Based on the above HUD data analyses, it appears that no racial/ethnic household population is experiencing a disproportional housing problem.

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

For households experiencing one of the four housing problems, rental assistance, housing rehabilitation assistance and certain types of social services (e.g., safety net services) may help reduce or offset household expenditures, potentially providing these households with additional resources to afford respective housing situations.

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

San Clemente has a specific area where there is a concentration of a racial/ethnic group (Hispanic/Latino). Hispanic/Latinos comprise 17 % of the population in San Clemente and two Census Tracts within San Clemente have a Hispanic/Latino concentration of over 50% - Census Tracts 421.07 and 421.08. Both of these Census Tracts include CDBG-eligible block groups (see **Appendix Map 1: CDBG Target Areas**).

NA-35 Public Housing – 91.205(b)

Introduction

San Clemente does not operate a HUD-funded public housing authority – the City partners with OCHA. The information provided in **Table 22** through **Table 26** is for all Orange County communities served by OCHA.

Table 22 - Public Housing by Program Type

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

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, Mainstream Home Transition

Data Source: PIC (PIH Information Center)

Table 24 – Characteristics of Public Housing Residents by Program Type

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

Data Source: PIC (PIH Information Center)

Table 25 – Race of Public Housing Residents by Program Type

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

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition
 Data Source: PIC (PIH Information Center)

Table 26 – Ethnicity of Public Housing Residents by Program Type

Ethnicity	Program Type									
	Certificate	Mod-Rehab	Public Housing	Total	Project - based	Tenant - based	VA Supportive Housing	Family Unification	Disabled *	
Hispanic	0	0	0	1,941	0	1,814	34	87	4	
Not Hispanic	0	0	0	8,884	0	8,604	153	120	6	

*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition
 Data Source: PIC (PIH Information Center)

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

Not applicable

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

Not applicable

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

Not applicable

Discussion

As indicated previously, the City of San Clemente does not own or manage public housing. City residents are served by OCHA. San Clemente will continue to work in partnership with OCHA, as necessary. These efforts include consultation as part of the preparation of the City's Consolidated Plan and annual Action Plans, and assisting OCHA with the preparation and certification of their Public Housing Authority (PHA) Plan.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Homeless researchers typically use one of two methods to measure homelessness. One method attempts to count all persons that are literally homeless on a given day/week (point-in-time counts). The second, examines the number of people who are homeless over a given period - period prevalence counts. The Orange County Continuum of Care (OC-CoC) uses the first method for its biennial enumeration of the region's homeless. Because there is limited data regarding San Clemente's homeless population, it is generally assumed that the characteristics of the City's homeless population are similar to those of the region's homeless.

Table 27 - Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) & Child(ren)	68	65	NA	NA	NA	NA
Persons in Households with Only Children	NA	NA	NA	NA	NA	NA
Persons in Households with Only Adults	NA	NA	NA	NA	NA	NA
Chronically Homeless Individuals	3	14	NA	NA	NA	NA
Chronically Homeless Families	NA	NA	NA	NA	NA	NA
Veterans	3	13	NA	NA	NA	NA
Unaccompanied Child	NA	NA	NA	NA	NA	NA
Persons with HIV	1	2	NA	NA	NA	NA

Data Source Comments: 211-OC 2015 Point In Time Survey

Indicate if the homeless population is: The City Has No Rural Homeless

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

No definitive analysis of San Clemente's homeless population has been conducted; however, it may be possible to estimate the number of homeless based on national and regional estimates. The 2015 Annual Homeless Assessment Report (AHAR) to Congress estimated the nation's homeless population at 561,708 individuals - 0.17% of the nation's population. The 2015 AHAR estimated California's homeless population at 115,738 individuals, or 0.30% of the state's population. Data for the AHAR was generated by biennial point-in-time surveys of the homeless carried out nationwide on January 24, 2015. The OC-CoC conducted a Point-In-Time Survey (PITS) of Orange County's homeless as part of this national survey. The 2015 PITS estimated the County's homeless population at 4,452 individuals - approximately 0.14% of the County's population.

The 2015 PITS did not attempt to enumerate the homeless in San Clemente; however, it is reasonable to assume that the characteristics and demographics of the City's homeless population are fairly similar to the County's. Based on City staff research and analysis, the City's 2013-2021 Housing Element estimates the City's year-round unsheltered homeless population at 65 individuals. The 2015 PITS estimates that 49 % of homeless individuals were unsheltered and 51% sheltered. Applying these unsheltered and sheltered percentages to the Housing Element homeless figure, it is estimated there may be 133 homeless in San Clemente (65 unsheltered and 68 sheltered). This figure represents approximately 0.2% of the City's population, which is consistent with national, state and regional estimates.

Chronic Homeless Individuals: A chronically homeless individual is an unaccompanied homeless individual (living in an emergency shelter or is unsheltered) with a disabling condition, who has been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years. The 2015 PITS estimates that 13% of the County's homeless are chronic homeless. Based on this percentage it is estimated that 17 of San Clemente's homeless may be chronically homeless. The PITS also estimates that 80% of the chronic homeless are unsheltered.

Chronically Homeless Families and Families with Children: According to the 2015 PITS, 13% of homeless families include minor children - less than 0.1% were unsheltered (the PITS reports two only unsheltered families with children). The 2015 PITS further indicates there were only eight chronically homeless families in the region, none of which were unsheltered. Agencies serving homeless families in South Orange County indicate the PITS undercounted homeless families. Service providers estimate as many as 70 homeless families went uncounted during the latest PITS.

Veterans and their Families: The County's 2015 PITS found that 12% of the homeless surveyed were Veterans. Of this number, 20% were sheltered and 80% were unsheltered. Based on the estimated number of San Clemente homeless, 16 may be a Veteran. The PITS provided no information regarding homeless Veterans with families.

Unaccompanied Youth: The 2015 PITS did not estimate "unaccompanied children" (as requested on **Table 27**); however, the PITS estimated the number of youth households, i.e., adults between the ages of 18 and 24 – Transitional Age Youth or TAY. The 2015 PITS estimates 5% of the region's homeless were homeless youth. Based on this statistic, it is estimated that there may be seven unaccompanied homeless youth in San Clemente. The PITS indicates the majority of homeless youth in the region were sheltered (76%).

HIV/AIDS: The 2015 PITS estimated that 2% of homeless adults are living with HIV/AIDS (31% were sheltered and 69% unsheltered). Based on this data, it is estimated there may be three homeless individuals with HIV/AIDS in San Clemente.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	NA	NA
Black or African American	NA	NA
Asian	NA	NA
American Indian or Alaska Native	NA	NA
Pacific Islander	NA	NA
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	NA	NA
Not Hispanic	NA	NA

Data Source Comments: No data available.

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

OCHA has provided the City with information regarding San Clemente households that submitted applications for rental assistance in 2012, the last time OCHA accepted applications. Based on this information, 429 San Clemente households are presently on the waitlist for housing assistance. Of this number, 157 are households with children, 102 are listed as senior households (age 62 and older), and 127 of applicants indicate they are disabled. OCHA staff indicates there are no Veteran households on the waitlist. OCHA estimates it will take approximately five years to work through the waitlist.

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

The 2015 PITS estimates that 69% of homeless families are racially White, with African American/Black families the next largest group at 14%. An estimated 44% are ethnically Hispanic/Latino. Local service providers indicate that approximately 90% of homeless families served are White; the remaining 10% represent various minority populations.

Among homeless households without children, the 2015 PITS estimates 75% are racially White, with African American/Black the next largest racial group at 15%. An estimated 36% are ethnically Hispanic/Latino. Since no additionally racial or ethnic data for San Clemente’s homeless population is available, it is reasonable to assume San Clemente’s homeless population is basically similar to the racial and ethnic composition as the rest of the County.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

As outlined above, based on City staff research and analysis for preparation of the City’s 2013-2021 Housing Element, the City’s year-round unsheltered homeless population is estimated to be 65 individuals. Assuming that the composition of the community’s homeless mirrors the characteristics of the region’s homeless population, an additional 68 homeless individuals are sheltered. This estimate is summarized in **Table 27**.

Discussion:

The 2015 Point-In-Time Survey of Orange County's homeless does not specifically identify the number of homeless in San Clemente; however, it does provide regional information that can be used to estimate the local homeless population. Additionally, the City's recently adopted Housing Element includes a homeless estimate based on staff research and analysis and input from local service providers and Orange County Sheriffs that patrol the City. National, state, and regional estimates indicate that the homeless population typically comprises 0.1% to 0.2% of the total population. San Clemente's estimated 133 homeless is consistent with this indicator. It is also presumed that the demographic characteristics San Clemente's homeless population is similar to the County's homeless population as reported in the 2015 PITS.

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

Introduction:

HUD requires that the Consolidated Plan include a review of relevant data regarding the housing needs of persons that require special supportive housing needs, but who are not homeless. Certain segments of the population, such as elderly, disabled, persons with HIV/AIDS, public assisted housing residents and large families may experience conditions that make it difficult for them to access affordable housing. Physical or medical conditions, particular space or supportive service requirements, incomes, or other factors may impede a household's ability to obtain decent and affordable housing. This section briefly describes the characteristics of the special needs populations in San Clemente.

Describe the characteristics of special needs populations in your community:

Elderly/Frail Elderly. According to the 2010 Census, 13.2% of all residents in San Clemente were ages 65 and over. Updated Census figures (2010-2014 ACS) estimates 14.3% of all City residents are age 65 and older. Some of this group's special needs included limited mobility, increased medical attention due to health complications and restricted fixed income, such as Social Security, pension programs and retirement income. Many elderly people have difficulty completing normal, everyday tasks without assistance. Common services for the elderly include public transit, home delivery services and in-home medical care.

As detailed in HUD's housing needs tables (**Tables 9 and 10**), overall 7.7% lower income elderly households are experiencing housing cost burden, and over 5.4% of lower income elderly households are experiencing severe housing cost burden.

As of March 31, 2016, OCHA provided housing assistance to 85 senior households; OCHA also reports 102 senior San Clemente households are presently on the housing assistance waitlist.

Persons with mental, physical, and/or developmental disabilities. According to the 2009-2013 ACS, approximately 7.6% of the San Clemente population had one or more disabilities. Federal laws define a person with a disability as, "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limit one or more major life activities.

As of March 31, 2016, OCHA provided housing assistance to 27 disabled households. OCHA also reports 127 disabled San Clemente households are presently on the housing assistance waitlist.

Victims of domestic violence, dating violence, sexual assault, and stalking. Domestic violence is manifested in many forms; willful intimidation, physical assault, sexual assault, and/or other abusive

behavior that is part of a systematic pattern of power and control perpetrated by one intimate partner against another. Nationwide it is estimated that one in three women and one in four men experience some form of domestic violence by an intimate partner. The California Department of Justice reports that in 2014, 205 domestic violence calls for assistance were reported in San Clemente. For these individuals and households, temporary safe housing is vital. The 2015 PITS estimates that 774 or 21% of homeless adults were victims of domestic violence. Several housing options are available for victims of domestic violence; however, the 2015 PITS indicates that 42% of these individuals were unsheltered.

Persons with HIV/AIDS and their families. The Orange County Health Care Agency estimated that as of December 31, 2014, 5,760 persons were living with HIV in Orange County. With respect to San Clemente, the Health Care Agency reports 100 to 199 San Clemente residents are living with HIV. Persons with HIV/AIDS face an array of challenges to obtain and maintain stable housing. Access to safe, affordable housing may be as important to their general health and wellbeing as is access to quality healthcare. For many, the persistent shortage of stable housing can be a barrier to consistent medical care and treatment. In addition, persons with HIV/AIDS may be targets of discrimination, including illegal eviction from their homes when their illness is exposed. The Fair Housing Amendments Act of 1988 prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.

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

Elderly/Frail elderly. As people age, their dependency on Social Security and pension programs increases as their primary income sources. In San Clemente, approximately 13.2% of the population is 65 and older. While the elderly may qualify to receive income through Social Security, this income source may only cover part of the total cost of a mortgage or rent leaving little or nothing for food, medical needs, or other necessities. Frail elderly individuals often require specialized in-home services such as food preparation, housekeeping, and personal hygiene assistance. Assisted-living facilities generally cost more than the typical housing in the community, which could make it increasingly difficult for this group to afford housing without assistance. Senior advocates, such as Age Well Senior Services, have provided the City with information regarding the service needs of the community's senior. Additionally, the County's Office on Aging supports a variety of services including elder abuse prevention and legislative advocacy on behalf of seniors.

Persons with mental, physical, and/or developmental disabilities. Having a disability negatively impacts a person's ability to work and earn money. Many disabled people live in households with incomes below the federal poverty level; therefore, access and availability to affordable housing is a key housing issue among persons with disabilities. In addition to affordability, other needs may include supportive services, designed features to accommodate physical limitations, and proximity to transit and community amenities. The Regional Center, is a nonprofit organizations contracted by the State of California to coordinate lifelong services and supports for individuals with developmental. The Regional Center is the first stop for those seeking to obtain local services and supports to help them live safely

and with dignity in the community. Partner agencies provide a variety of services ranging from housing, self-determination programs, and employment training and placement.

Victims of domestic violence, dating violence, sexual assault, and stalking. Victims of domestic violence need access to safe housing and specialized support services such as legal, mental health and financial counseling. Several agencies in the County provide these services and also advocate on behalf of their clients. The City consulted with Laura’s House, one of the County’s leading providers of housing and services for victims of domestic violence, during the preparation of the Consolidated Plan.

Persons with HIV/AIDS and their families. As outlined above, persons with HIV/AIDS may face an array of barriers to obtain and maintain affordable, stable housing. Based on average housing costs, persons with HIV/AIDS could be forced to pay a large portion of their income that might otherwise go toward monthly rent or mortgage for healthcare. HUD has allocated Housing Opportunities for Persons With AIDS (HOPWA) grant funds to the City of Anaheim on behalf of all Orange County cities. Through the consultation process, the City of Anaheim has indicated that on a countywide basis it will utilize HOPWA resources to fund supportive services (approximately 170 individuals per year with short-term rent, mortgage or utility assistance) and Tenant Based Rental Assistance (approximately 50 households per year). No specific HOPWA-funded program or project is slated for San Clemente.

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

The Orange County Health Care Agency estimated that there were 6,698 persons living with HIV in Orange County in 2014. This figure is comprised of 5,760 persons living with HIV who are aware of their HIV status and an estimated 938 persons who are unaware of their HIV status. During 2014, 261 Orange County residents were newly diagnosed with HIV and 71 with AIDS. Other data regarding the characteristics of the County’s “People Living With HIV Disease (PLWHD)” include the following:

- By gender: 86.4% male, 12.8% female and 0.7% are transgender male to female
- By race/ethnicity: 46.7% Hispanic, 40.7% White, 6.8% Asian/Pacific Islander and 4.9% Black
- By age: 72.0% age 40 years and over, 27.3% age 20-39 years and 0.7% under the age of 20
- As of December 31, 2014, 51 children diagnosed with HIV before the age of 13 were living in Orange County
- The 10 cities with the highest number of PLWHD (in order): Santa Ana, Anaheim, Garden Grove, Orange, Huntington Beach, Costa Mesa, Irvine, Laguna Beach, Fullerton, and Tustin.

(NOTE: The Consolidated Plan Template includes three tables that are only applicable to the regional HOPWA recipient (City of Anaheim); however, by default these tables do not appear in San Clemente’s Consolidated Plan, therefore, the next sequence of tables will begin with number Table 31.)

Discussion:

HUD has provided significant amounts of housing needs data for the City to assess. Orange County is one of the most expensive housing markets in the nation; therefore, it is not unexpected that many households in San Clemente are experiencing some form of housing issues. Cost burden is the most prevalent housing problem in the City. In addition to the housing challenges faced by many San Clemente households, special need populations also face the added burden of affording the services that help to maintain their quality of life.

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

Describe the jurisdiction's need for Public Facilities:

Overall, the City's public facilities are in good condition; however, some upgrading of aged or deteriorated improvements may be needed. While most City public facilities have been constructed or upgraded to meet ADA accessibility requirements, the City will continue to identify additional public and community facilities that may need ADA-upgrades as regulations are modified. Some of these future improvements may be addressed with CDBG funds.

How were these needs determined?

The City of San Clemente's Capital Improvement Program identifies public infrastructure and public facilities throughout the City are slated for installation, replacement or upgrading.

Describe the jurisdiction's need for Public Improvements:

Parts of San Clemente represent some of Orange County's oldest communities, with a significant percentage of its public infrastructure in need of upgrading. Examples of needs include missing or deteriorating sidewalks, and aging or ADA non-compliant public facilities and parks.

Planned improvements over the next four years will generally include the following:

- Street Improvements – project types include complete reconstruction of street surfaces and streetscape improvements, or installation of missing sidewalks
- ADA Improvements – curb, sidewalk and ramp improvements to comply with ADA regulations
- Other Facilities –community center improvements, youth center and other public and quasi-public facilities to address deferred maintenance or ADA regulations

How were these needs determined?

The evaluation of community development needs is based on consultation with staff from the City, public agencies, residents, and information from various City plans (e.g. Capital Improvement Program).

Describe the jurisdiction's need for Public Services:

There are numerous public, social and faith-based agencies that serve San Clemente's residents. These organizations address numerous social, health, education and public safety needs of residents. The demand for public and social services typically exceed available resources especially for social safety net services.

How were these needs determined?

The evaluation of community development needs is based on consultation with staff from the City, public agencies, nonprofit service providers and residents. The City also utilized data gleaned from the biennial Mission Hospital Community Health Needs Assessment.

IV. Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The purpose of the Market Analysis is to provide a clear picture of the environment in which San Clemente will administer its CDBG programs over the term of the Consolidated Plan. The Market Analysis includes the following sections:

- Number of Housing Units, Cost of Housing, Condition of Housing
- Public and Assisted Housing
- Homeless Facilities and Services
- Special Needs Facilities and Services
- Barriers to Affordable Housing
- Non-Housing Community Development Assets
- Needs and Market Analysis Discussion

In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and the programs and projects to be administered. Most of the data tables in this section are populated with default Comprehensive Housing Affordability Strategy (CHAS) data developed by the Census Bureau for HUD based on 2008-2012 American Community Survey (ACS) data. Other sources are noted throughout the Plan. This housing analysis will also examine barriers to affordable housing, including impediments to fair housing choice.

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

Introduction

San Clemente’s housing stock, based on 2008-2012 ACS data provided by HUD, is predominately comprised of well-maintained single-family detached units, approximately 58% of the housing stock, with another 11% single-family attached units (condominiums/townhomes). The other 29% of the housing stock is multi-family units with 2% of the properties being mobile homes or others. **Table 31** has specific housing figures and **Table 32** shows unit size categories of housing categories by tenure.

Table 31 – Residential Properties by Unit Number

Property Type	Number	%
1-unit detached structure	15,577	58%
1-unit, attached structure	2,920	11%
2-4 units	4,086	15%
5-19 units	2,612	10%
20 or more units	1,156	4%
Mobile Home, boat, RV, van, etc.	465	2%
Total	26,816	100%

Data Source: 2008-2012 ACS

The City’s Housing Element provides updated figures for the City’s Housing Inventory:

- Single family detached – 14,861 units (56.9% of total housing stock)
- Single family attached – 2,603 units (10.0% of total housing stock)
- Multi-family – 8,051 units (30.8% of total housing stock)
- Mobile homes and Other – 601 (2.3% of total housing stock)

Table 32 – Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	11	0%	419	5%
1 bedroom	172	1%	2,138	26%
2 bedrooms	2,730	17%	3,644	43%
3 or more bedrooms	12,778	81%	2,177	26%
Total	15,691	99%	8,378	100%

Data Source: 2008-2012 ACS

The Housing Element also provides information regarding “Unit Type by Tenure.”

- Studio: Owners: 0 units/0.0% Renters: 471 units/5.7%
- 1 Bedroom: Owners: 158 Units/1.0% Renters: 2,060 units/24.8%
- 2 Bedroom: Owners: 2,797 Units/17.6% Renters: 3,586 units/43.18%

- 3 Bedroom: Owners: 6,110 Units/38.5% Renters: 1,604/19.3%
- 4 Bedroom: Owners: 4,965 Units/31.3% Renters: 520/6.3%
- 5 or more Bedrooms: Owners: 1,839 Units/11.6% Renters: 74/0.8%

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

San Clemente is limited as to how CDBG funds can be used for the development of new housing. In general, CDBG funds may not be used for the construction of new housing. Prior to the loss of redevelopment funding, San Clemente was able to provide financial incentives to developers to include affordable housing units as part of their project. With the loss of redevelopment funding, San Clemente has focused on creating other incentives for the development of affordable housing such as density bonus, tax-exempt financing, waiver of fees, and assistance with development of on-site and off-site improvements, and reductions in parking requirements. Currently, there are 492 affordable housing units in nine different housing project developments in San Clemente (**Attachment I**).

According to data from Attachment G, four projects were funded with Low Income Housing Tax Credits, which have affordability requirements for 55 years. These projects are limited to families that make up to 60% of area median income. With respect to seniors, there are three projects with a total of 270 units in San Clemente that are restricted for those age 55 or 62 and older. The renter qualifications for these senior projects are not to exceed anywhere from 50% to 80% of median income.

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

State law requires that the City identify, analyze, and propose programs to preserve existing multi-family rental units which are eligible to convert to non-low-income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during a ten-year period commencing on the statutory deadline of the Housing Element update. None of the city's affordable housing units listed in **Attachment I** are at-risk of converting to market rate housing in the ten-year planning period.

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

The Southern California Association of Governments (SCAG) undertakes a Regional Housing Needs Assessment (RHNA) to quantify the anticipated need for housing within a five-county region. California General Plan law requires each city and county to have land zoned to accommodate its fair share of this regional housing need calculated by SCAG. The State Department of Housing and Community Development (HCD) allocates a numeric regional housing goal to the SCAG figures, which are then mandated to be distributed among the cities and counties in the region. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the SCAG region so that every community provides for a mix of housing for all economic segments. The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate

through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period. The distribution of housing need by income category for each jurisdiction is adjusted to avoid an overconcentration of lower-income households in any community. As determined by SCAG, the City of San Clemente's allocation is 581 new housing units during this planning cycle.

Describe the need for specific types of housing:

The current RHNA for the SCAG region covers a seven-year planning period (January 1, 2014 to October 1, 2021) and is divided into four income categories: very low, low, moderate, and above moderate. Per SCAG, San Clemente's allocation of 581 new housing units is divided among the four income categories:

- Extremely/Very Low - 134 units
- Low - 95 units
- Moderate-108 units
- Above Moderate-244 units

As stated in previous section San Clemente currently has an inventory of 492 affordable housing units. It should also be noted that San Clemente has already constructed or permitted 220 housing units since January 1, 2014—leaving a remaining RHNA goal of 361 units.

Discussion

The City of San Clemente has a balanced mix of housing units with over 26,000 housing units of various sizes for renters and owners. Regional planners have allocated a multi-year housing goal to the City to meet its fair share of future housing needs. Housing goals are established for various income levels. The City's Housing Element has established a strategy and programs to meet housing goals. Since January 2014, building permits have been approved for approximately 40% of future housing need goals.

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

Introduction

Orange County is among the top ten priced housing markets in the country. A May 2014, Forbes Magazine article identified Orange County the third least affordable housing market for the middle class. **Table 33** shows that homes have more than doubled in price from 2000 to 2012. And, since 2012 homes have increased in price from \$735,600 to \$825,000 in 2015, according to DQNews. Regarding rents, the *Orange County Register* reported that in July 2015, the average Orange County rent was \$1,848 – an all-time average high for the County. **Table 34** shows rents paid in San Clemente by price category, with over half of the renters paying more than \$1,500 per month in the City. San Clemente’s Housing Element listed rents for 225 apartments units of varying sizes (for September 2015) in the City as follows:

- Studio: \$1,421
- 1-bedroom: \$1,592
- 2-bedroom: \$2,212
- 3-bedroom: \$3,169
- 4+ bedrooms: \$4,498.

Per the City’s Housing Element, overall, average rents in San Clemente (\$2,672) are significantly higher than the County rents (\$1,848).

Table 33 – Cost of Housing

	Base Year: 2000	Most Recent Year: 2012	% Change
Median Home Value	364,800	735,600	102%
Median Contract Rent	874	1,546	77%

Data Source: 2000 Census (Base Year), 2008-2012 ACS (Most Recent Year)

Table 34 - Rent Paid

Rent Paid	Number	%
Less than \$500	324	3.9%
\$500-999	693	8.3%
\$1,000-1,499	3,057	36.5%
\$1,500-1,999	2,366	28.2%
\$2,000 or more	1,938	23.1%
Total	8,378	100.0%

Data Source: 2008-2012 ACS

Table 35 – Housing Affordability

% Units Affordable to Households Earning	Renter	Owner
30% AMI	125	No Data
50% AMI	295	30
80% AMI	2,930	135
100% AMI	No Data	199
Total	3,350	364

Data Source: 2008-2012 CHAS

Table 36 – Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,161	1,324	1,672	2,327	2,532
High HOME Rent	1,123	1,204	1,447	1,663	1,835
Low HOME Rent	853	914	1,097	1,267	1,413

Data Source Comments: www.hudexchange.info/resource/reportmanagement/published/HOME_RentLimits_State_CA_2016.pdf

Is there sufficient housing for households at all income levels?

Based on HUD data tables above, it appears there is a limited supply of housing units affordable to lower income household. As indicated on **Table 33**, the median home price in 2012; with current median home prices over \$825,000. Based on general real estate professional underwriting and current interest rates, a homebuyer with good credit and a 20% down payment would need an annual household income of over \$150,000. **Table 34** indicates that over 50% of renter households are paying a monthly rent of over \$1,500. Utilizing HUD’s rent to income affordability ratio (i.e., 30% of income for housing), a renter would need an annual income of over \$54,500 to afford of this rent level. **Table 35** provides data regarding the availability of housing units for lower income households. This table indicates there is a shortage of units renting at levels that are affordable among all HUD lower income household categories.

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

As demand continues to increase housing costs will most likely continue to increase, negatively affecting affordability. According to the *Orange County Register*, rents, home prices and home sales all are projected to increase in 2016, though at a slower pace than in 2015. Chapman University and Cal State Fullerton economic forecasters predict that the median price in Orange County will rise 4% to 6% in 2016. With respect to rents, Marcus & Millichap’s 2016 apartment report indicates Orange County apartment rents may increase 4.5% more during 2016 to an average rent of \$1,895 per month. A review of on-line apartment listings indicates rent for a two-bedroom, one-bath unit ranges from \$1,655 to \$2,130 per month.

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

The City of San Clemente is not a participating jurisdiction in HUD's HOME program; however, HUD's calculated rents from **Table 36** were compared to market rents listed in the Housing Element. This comparison shows San Clemente market rental rates are significantly higher than HUD's calculated rents. The current Housing Element indicates the median monthly rent for a two-bedroom unit is \$2,212 - \$540 higher than HUD's Fair Market Rent, \$765 more than High HOME rents and \$1,115 higher than Low HOME rents (for a two-bedroom unit).

Discussion

Evaluation of the San Clemente's housing market supports the findings in the Needs Assessment, that is, despite a good mix of housing types by tenure, lower income households in the City are cost burdened, especially extremely low-income and very low-income households. The supply of housing units at cost/rent that is affordable to lower income households is limited requiring lower income households to dedicate a larger portion of their income to maintain housing.

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

Introduction

In general, San Clemente’s housing stock is in good condition and is well maintained, nonetheless, HUD requires that the City evaluate the condition of the City’s housing stock as part of the Consolidated Plan.

Definitions

A property in “substandard condition” means a dwelling unit that contains a circumstance that endangers the life, limb, health, property, safety, or welfare of the public or the occupants. The conditions that make a property a “substandard dwelling” are defined in detail in Section 17920.3 of the California Health and Safety Code.

For purposes of the CDBG program, “substandard condition but suitable for rehabilitation” means that the cost of remedying all substandard conditions plus the current value of the property does not exceed the after-rehabilitation value of the property.

Four housing problems that HUD attributes as substandard or problematic:

1. Lack of complete kitchen facilities
2. Lack of complete plumbing facilities
3. More than one person per room
4. Cost burden greater than 30%

Table 37 - Condition of Units Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	6,899	44%	4,262	51%
With two selected Conditions	89	1%	429	5%
With three selected Conditions	36	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	8,667	55%	3,687	44%
Total	15,691	100%	8,378	100%

Data Source: 2008-2012 ACS

Table 38 – Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,403	28%	940	11%
1980-1999	5,456	35%	1,874	22%
1950-1979	5,335	34%	5,160	62%
Before 1950	497	3%	404	5%
Total	15,691	100%	8,378	100%

Data Source: 2008-2012 CHAS

Table 39 – Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	5,832	37%	5,564	66%
Housing Units build before 1980 with children present	1,865	12%	790	9%

Data Source: 2008-2012 ACS (Total Units) 2008-2012 CHAS (Units with Children present)

Table 40 - Vacant Units

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

Data Source: 2005-2009 CHAS

ADDED TEXT:

San Clemente had a vacancy rate of 7.9%, according to the 2010 Census; however, detailed vacancy rate by the Census reported the for-rent vacancy at 5.8% and the for-sale vacancy at 1.3%. Other units were vacant due to foreclosures, seasonal occupancy, or other reasons. According to San Clemente staff research, an estimated 511 housing units in the City are used as vacation rentals. The increased presence of vacation rentals has the potential to exacerbate the tight rental housing market in the community, reducing affordable housing opportunities for the workforce. Nonetheless, the real vacancy rates for the City were within the industry standard of 5% to 6% for rental housing and 2% for ownership housing. The City recently adopted an ordinance limiting the number of vacation rentals

Regarding foreclosures, according to RealtyTrack and the Department of Finance, in November 2015 San Clemente had 47 homes in pre-foreclosure, 20 homes in auction, and 40 bank-owned homes for a total of 107 homes. The average price of a San Clemente foreclosure home was \$810,000 in September 2015, very near the market rate purchase price of a home in the City.

Need for Owner and Rental Rehabilitation

Based on data from **Table 38**, approximately 63% of San Clemente’s owner housing stock was built after 1980. Generally, homes built within the last 30 years are in good shape with little repair required. Homes begin to show age after 30 years and can require significant maintenance and even extensive rehabilitation. Data from the Needs Assessment indicates that many lower income homeowners are expending more than 30% of their income on housing. City-funded housing rehabilitation assistance can help these households maintain and improve their homes without incurring

additional housing costs. If not for the housing rehabilitation assistance program, many low-income seniors would be unable to complete deferred maintenance repairs on their older properties.

Table 38 also indicates that approximately 67% of the City's rental housing stock was built prior to 1980. As indicated above, housing of this vintage can benefit from rehabilitation assistance programs to address health and safety issues. Current tax regulations provide owners of rental properties with various incentives and opportunities to maintain their investment.

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

Lead based-paint was banned in the United States in 1978. **Table 39** indicates there are an estimated 11,396 housing units in San Clemente that were constructed before 1979, with 2,655 of these homes having children present. According to San Clemente City staff, less than 4% of the housing stock in the City is in need of rehabilitation or replacement—primarily for lead-based paint hazards.

Discussion

In general, San Clemente's housing stock is well maintained and in good to excellent condition; however, it is important to note that a significant percentage of the housing stock is over 30 years old. After 30 years, homes may begin to require significant maintenance and even extensive rehabilitation (roofs, plumbing, etc.). Additionally, some residences constructed before 1978 may have lead based-paint hazards. San Clemente has established a housing rehabilitation program to assist lower income homeowners to improve and maintain their home, and if necessary, remove lead based-paint hazards.

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

Introduction

There is no public housing in the City of San Clemente. OCHA operates the rental assistance program within the City.

Table 41 – Total Number of Units by Program Type

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Vouchers			Special Purpose Voucher Disabled*	
					Project - based	Tenant - based	VA Supportive Housing		Family Unification
# of units vouchers available				9,925			879	1,669	0
# of accessible units									

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

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Not applicable

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

Not applicable

Public Housing Condition

Table 42 - Public Housing Condition

Public Housing Development	Average Inspection Score
NA	NA

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

Not applicable

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

Not applicable

Discussion:

Not applicable

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

Introduction

As previously discussed, the OC-CoC conducts a biennial point in time count/survey of the homeless. The 2015 Point-In-Time Survey did not provide city-specific homeless data; however, the number of homeless in San Clemente has been estimated based on homeless population trends and analysis conducted to prepare the City's 2013-2021 Housing Element. It is important to note that homeless shelter and housing information discussed below is based on the housing as definition by the OC-CoC (see Attachment J). Homeless estimates and shelter data in the Housing Element are defined as required by State regulations.

Table 43 - Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds Current & New	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds		Current & New	Under Development
Households with Adult(s) & Child(ren)			26		7
Households with Only Adults					
Chronically Homeless Households					
Veterans					
Unaccompanied Youth			14		

Data Source Comments: City of San Clemente

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

The City of San Clemente does not provide direct services to the homeless; however, the City does provide financial assistance to nonprofit agencies that provide housing and support services for homeless San Clemente residents and those at risk of becoming homeless. Case managers at these service agencies work closely with clients to identify and qualify households for appropriate mainstream services and resources. Examples of mainstream services available include veterans housing vouchers, veteran medical services, MediCal/Medicare, SSI, and general relief.

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

As indicated in **Table 43**, there are 40 transitional housing beds in the City of San Clemente. These shelter beds are targeted toward homeless families and unaccompanied youth with a history of mental or physical disabilities. The purchase of permanent supportive housing units for up to seven homeless families with children was recently completed with private funding.

It is important to note that there are additional emergency shelter beds in the City; however, these beds are reserved for victims of domestic violence. Because the service provider will typically not house a City resident in this facility, these beds are not included on **Table 43**.

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

Introduction

HUD requires that the Consolidated Plan describe, to the extent information is available, facilities and services that assist persons who are not homeless but require supportive housing and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

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

Senior and Frail Elderly: There are several skilled nursing and residential care facilities located in San Clemente. Based on consultation with the Council on Aging, it has been determined that there are 530 residential care beds in 27 facilities in San Clemente. The bulk of these facilities are six-bed facilities operating in residential neighborhoods. There are four facilities in the City with total beds ranging from 55 to 143. Additionally, there are 209 subsidized senior housing units in the City.

Group Homes/Quarters: The State reports that in January 2014, there were 814 San Clemente residents living in group housing. Examples of group homes included homes for the mentally retarded and physically disabled, seniors, and those recovering from substance addiction.

HIV/AIDS Housing: As stated previously, there are no shelters or permanent housing units for persons with HIV/AIDS in San Clemente.

Public Housing Residents: There is no public housing in San Clemente. As of March 31, 2016, a total of 142 households in San Clemente are receiving a rental housing voucher or certificate from OCHA.

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

The OC-CoC is responsible for developing the region's 10 Year Plan to End Homelessness. This plan includes the region's discharge plan, which aims to ensure individuals leaving institutional or medical facilities do not exit directly into homelessness. The plan outlines protocols for discharge from public facilities (such as jails) and public systems (such as the foster care system). The plan also establishes protocols to identify and assess those at-risk of homelessness and link them to needed services must be developed and supported. OC-CoC members continue to develop the plan and adjust the plan to address the changing homeless environment (especially in light of changes in HUD homeless funding directives and the impact of legislation such as Proposition 47).

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with

respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City will continue to support various organizations that provide services to persons that have special needs. Some of the services described below serve different types of low income populations, not just homeless. (**Note:** Not all programs listed have received or will receive financial assistance from the City.)

- **RIO Adult Day Health Care Center**, 2021 Calle Frontera San Clemente: Nonprofit, licensed, Medi-Cal certified day Health Care Program that treats the health and supportive needs of older adults. The program is staffed with nurses, social workers, therapists, aids, activities, and administrative personnel.
- **St. Clement's-By-The-Sea Episcopal Church**, 202 Avenida Aragon San Clemente: Summer food service program for low income families.
- **CUSD Family Resource Center & Learning Links Program**, 101 Calle Puente San Clemente: A variety of services for families with children under 5 years old.
- **South County Outreach**, 7 Whatney Irvine: Services include food, rental assistance, and job search. Transitional apartments are available to qualified applicants – including San Clemente residents (City-funded activity).
- **Camino Health Services and Dental Clinic**, 1031 Avenida Pico, Ste. 104, San Clemente CA: Low cost primary and general medical services available to low-income and indigent San Clemente residents (CDBG-funded activity).

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

San Clemente is not a HOME program participating jurisdiction.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City has little control over market variables that impact the cost of housing, e.g., cost of land, and cost of construction supplies, materials and labor. The City's Housing Element has identified governmental constraints that may have a negative impact to creating affordable housing opportunities.

Redevelopment Dissolution: Housing Set-Aside Funds. Until the dissolution of California's Community Redevelopment Agencies in February 2012, Redevelopment Housing Set-Aside funding was one of the primary sources of financing used for preserving, improving and developing affordable housing. As of 2012, Redevelopment Housing Set-Aside funds are no longer available, as all tax increment funds that previously went to the Agency are now allocated to underlying State and local taxing entities.

Environmental Review. State and federal law (e.g., California Environmental Quality Act and National Environmental Policy Act) require environmental review of proposed discretionary projects; e.g., subdivision maps, zone changes, etc. Costs and delays resulting from the environmental review process are added to the cost of developing housing in the form of carrying costs which are ultimately paid by a buyer or tenant.

Planning and Development Fees. Fees charged by local governments also contribute to the cost of housing. According to the Housing Element, San Clemente assesses all of its impact fees on a per unit basis, regardless of whether the housing unit is part of a single-family or multi-family project. Building division and engineering impact fees total (approximately) \$29,000 per unit.

Permit and Processing Procedures. The processing time required to obtain approval of development entitlements and building permits is sometimes cited as contributing to construction costs. In development parlance, "time is money" and developers can incur significant holding costs while waiting out a delay.

Land Use Controls. The City's General Plan is the policy document that not only establishes the location and amount of land that will be allocated to residential development, but also establishes the intensity of development (in terms of unit densities and total number of units) that will be permitted. While nearly all components or elements of the General Plan contain goals and policies that influence residential development, it is the Land Use Element that has the most direct influence. San Clemente's development standards do not contain any unduly restrictive provisions. Building height, setbacks, lot areas, and parking are generally within the range of other cities in the State.

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

Introduction

According to the data from **Table 46** (derived from the 2008-2012 ACS), San Clemente had 31,641 working-age adults in the labor force and an unemployment rate of 7.2%. More recent data from the California Employment Development Department show that in April 2016, the unemployment rate had decreased to 3.2%. This rate was lower than the 3.9% unemployment rate recorded for all of Orange County and the 5.3% unemployment rate for California for April 2016.

Economic Development Market Analysis

Table 45 - Business Activity Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	496	38	2	0	-2
Arts, Entertainment, Accommodations	4,079	2,567	14	16	2
Construction	1,429	1,740	5	11	6
Education and Health Care Services	4,218	1,876	15	12	-3
Finance, Insurance, and Real Estate	2,625	967	9	6	-3
Information	1,193	235	4	1	-3
Manufacturing	2,331	1,692	8	11	3
Other Services	1,018	731	4	5	1
Professional, Scientific, Management Services	4,118	2,182	15	14	-1
Public Administration	0	0	0	0	0
Retail Trade	3,794	1,884	13	12	-1
Transportation and Warehousing	732	66	3	0	-3
Wholesale Trade	2,165	1,731	8	11	3
Total	28,198	15,709	--	--	--

Data Source: 2008-2012 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

Table 46 - Labor Force Labor Force

Total Population in the Civilian Labor Force	31,641
Civilian Employed Population 16 years and over	29,376
Unemployment Rate	7.16
Unemployment Rate for Ages 16-24	19.91
Unemployment Rate for Ages 25-65	4.77

Data Source: 2008-2012 ACS

Table 47 – Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	10,045
Farming, fisheries and forestry occupations	903
Service	2,368
Sales and office	8,451
Construction, extraction, maintenance and repair	1,435
Production, transportation and material moving	605

Data Source: 2008-2012 ACS

Table 48 - Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,897	53%
30-59 Minutes	9,331	35%
60 or More Minutes	3,210	12%
Total	26,438	100%

Data Source: 2008-2012 ACS

Education:**Table 49 - Educational Attainment by Employment Status (Population 16 and Older)**

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,215	61	355
High school graduate (includes equivalency)	3,017	319	984
Some college or Associate's degree	8,144	707	2,609
Bachelor's degree or higher	12,852	546	3,019

Data Source: 2008-2012 ACS

Table 50 - Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	53	97	154	435	170
9th to 12th grade, no diploma	603	202	204	539	237
High school graduate, GED, or alternative	1,391	1,225	1,075	2,130	1,312
Some college, no degree	1,736	1,538	2,105	4,840	2,538
Associate's degree	274	422	760	1,980	696
Bachelor's degree	475	2,142	4,091	4,850	2,119
Graduate or professional degree	53	807	1,838	2,831	1,428

Data Source: 2008-2012 ACS

Table 51 –Educational Attainment: Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,385
High school graduate (includes equivalency)	35,519
Some college or Associate's degree	42,999
Bachelor's degree	64,866
Graduate or professional degree	92,705

Data Source: 2008-2012 ACS

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

According to **Table 45**, the four major business activity sectors in the City account for 57% of total “workers” and 54% of total “jobs.”

- Professional, Scientific, Management Services – 15% of Workers and 14% of Jobs
- Education and Health Care Services – 15% of Workers and 12% of Jobs
- Arts, Entertainment, Accommodations – 14% of Workers and 16% of Jobs
- Retail Trade – 13% of Workers and 12% of Jobs

Describe the workforce and infrastructure needs of the business community:

The Economic Development Element, a component of the City’s General Plan, is the City’s primary economic development strategy document. This document establishes, “goals and policies to guide decisions about public and private investment in and opportunities for improved quality of life through economic growth.”

As evident by HUD's data tables, San Clemente has a diverse workforce, with a prominence in professional, retail, and arts/entertainment-related jobs. The City's economic development strategy is focused on enhancing an environment to support growth in these employment sectors. This will be accomplished by supporting activities that enhance retail districts and centers, creating an environment to attract visitors, and improving technology and communications infrastructure to meet the needs of local businesses and residents. With respect to public infrastructure, the Economic Development Element supports the use of business improvement districts for various business/commercial areas. Within these districts, the need for physical improvements, such as parking facilities, landscaping, lighting, and pedestrian and bicycle facilities will be assessed.

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

Approximately three years ago, San Clemente lost its Economic Development Department; however, the *Business Liaison/Facilitator Program* was created by the Community Development Department to fill the void. The program provides the businesses an opportunity to establish a relationship with the City. The program's goal is to provide valuable "nuts and bolts" advice and assistance for business owners who must often juggle multiple tasks in order to secure City approvals for business licenses, signs, remodeling, etc. Under this program, a planner is designated to serve as a "Liaison" to one of four business districts. The Liaison handles all discretionary approvals within his/her district, and helps business owners by providing information on potential grant opportunities, programs/services, and guide property/ business owners through the permitting process. The Liaisons also help business owners to navigate environmental and other regulatory processes.

Two significant economic events have occurred in the City that will have an impact on job growth within the community. In early June, 2016, the owners of Saddleback Memorial Medical Center San Clemente closed its 40-year old hospital. While several employees have been transferred to other facilities, approximately 100 full-time and part-time jobs (primarily health care service jobs) may be lost. An outpatient medical campus is proposed to replace the hospital which may replace some lost employment opportunities. Conversely, in November 2015, phase one of a 500,000 square foot outlet shopping center open. It is projected that the project will generate \$1.4 M in annual sales tax revenue for the City and will create an estimated 1,000 jobs - many of which will be available to teens and young adults. Through the development entitlement process, much of the public infrastructure to support the center has been constructed.

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

The OC Workforce Investment Board indicates that there is workforce demand in Orange County for 1) information technology, 2) advanced manufacturing, 3) healthcare. The information related to health

care should be relevant to San Clemente because this is one of the top industry sectors in the community based on number of jobs.

The Orange County Business Council and the Orange County Workforce Investment Board's *2014-2015 Orange County Workforce Indicators Report* provides information regarding the need to close the "skills gap" for businesses by developing a highly-trained workforce. The report identifies "newfound growth" industry sectors prevalent in Orange County – health care, advanced manufacturing and information technology. The report also explores employer concerns that they are unable to find workers that possess certain skills, especially in "high-STEM" (science, technology, engineering and math) areas. There are several post-secondary educational institutions in or near Orange County that provide educational and training opportunities for San Clemente residents, these include Saddleback Valley College, UC Irvine, CSU Fullerton, and CSU San Marcos.

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

Economic Development Element implementing measures include support for regional business agencies, such as the Orange County Workforce Investment Board and the Orange County Small Business Development Center. These partnerships will help ensure businesses in San Clemente are aware of and have access to workforce recruitment and training services, and to ensure residents are aware of and have access to job search and business start-up training.

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

No

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

The General Plan's Economic Development Element establishes goals and policies to guide decisions about public and private investment in the City's economic growth. The Element also proposes initiatives to improve the City by creating economic opportunities that preserve and enhance the quality of life for San Clemente residents. These initiatives include developing a comprehensive economic development strategy, prioritizing resources that achieve jobs-housing balance, attracting visitors, and creating shopping and entertainment districts that create retail sales (and jobs).

Discussion

As outlined previously, San Clemente has a low unemployment rate; nonetheless, the City is actively involved in efforts to expand employment opportunities for residents and improve the local business

local environment. The Economic Development Element is the City's primary document regarding goals and policies to be used to implement this strategy. The Element also supports the City's mission statement which asserts the City will, "maintain a safe, healthy atmosphere in which to live, work and play; guide development to ensure responsible growth while preserving and enhance our village character, unique environment and natural amenities; and provide for the City's long-term stability through promotion of economic vitality and diversity, resulting in a balanced community, committed to protecting what is valued today while meeting tomorrow's needs."

MA-50 Needs and Market Analysis Discussion

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

Housing problem concentration is defined as a Census Tract with at least 80% of households experiencing one of four severe housing problems. Based on an evaluation of HUD data, it has been determined that there are no areas of concentration of households that have multiple housing problems.

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

San Clemente has two Census Tracts where there is a concentration of a racial/ethnic group (Hispanic/Latino). Racial/ethnic concentration is defined as a Census Tract where a racial or ethnic minority is at least 20 percentage points higher than that the minority's percentage of the City's whole population. Though, Hispanic/Latinos comprise 17% of the population in San Clemente, two Census Tracts within the City have a Hispanic/Latino concentration of over 50% (Census Tracts 421.07 and 421.08 – see Map #1). Both of these Census Tracts include Block Groups that may be eligible for CDBG-funded activities.

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

The Census Tract/Block Groups with Hispanic/Latino concentration are within the City's CDBG-eligible area. These tracts are located just south of the 5 Freeway near Camino Real in the central section of San Clemente. Types of housing in this area are predominately apartments and condominiums, with some single family homes. The neighborhoods are among some of the City's oldest with approximately 200 properties built in the 1920s. The area is also one of the most densely populated neighborhoods in the City with a mix of owner occupied and rental units.

Are there any community assets in these areas/neighborhoods?

There are several community assets in the aforementioned areas – Maxx Berg Park is the neighborhood focal points - the location of many community and neighborhood events. Adjacent to the park is Las Palmas Elementary School. This facility is also an important asset to the neighborhood, serving as the staging point for many community and educational initiatives. Other neighborhood resources include the Boys and Girls Club, St. Clements By the Sea Church, and the Capistrano Unified School District Family Resource Center.

Are there other strategic opportunities in any of these areas?

Both of the identified Census Tracts are within the older areas of San Clemente. These areas are mostly built out and have limited development opportunities; however, there may be opportunities to

rehabilitate existing structures. Additionally, this area has been Identified for installation of public improvements such installation of sidewalks.

V. Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan is the section of the Consolidated Plan that sets a course of action that the City will implement during the next four years to utilize HUD funds to address priority needs. HUD requires that the Strategic Plan:

- Describe the basis for assigning priority ranking for needs categories
- Identify accomplishments the City plans to achieve in quantitative and qualitative measures over a four-year period

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

Geographic Area

Table 52 - Geographic Priority Areas

1	Area Name:	CDBG Census Tracts
	Area Type:	Local Target area
	Other Target Area Description:	HUD designated CDBG-eligible areas
	HUD Approval Date:	2015
	% of Low/ Mod:	50.00%
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	Boundaries are established by Census Bureau and determined as CDBG-eligible by HUD.
	Include specific housing and commercial characteristics of this target area.	Vary depending on Census Tract - predominately residential.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Not applicable
	Identify the needs in this target area.	Often older sections of City that require upgraded or installation of public improvements.
	What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?		
2	Area Name:	Citywide
	Area Type:	Citywide program or activity
	Other Target Area Description:	Citywide program or activity
	HUD Approval Date:	2015
	% of Low/ Mod:	35.90%
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	

Include specific housing and commercial characteristics of this target area.	
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

General Allocation Priorities

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

To determine which activities will receive CDBG funding during the Consolidated Plan cycle of 2016-2019, the City utilized a simple **priority ranking** system. The following priority ranking system was used:

- **High Priority:** Activities that address a high priority need will be funded by the City during the four-year period provided adequate resources are available.
- **Low Priority:** The City may or may not fund a low priority need activities during the four-year period.

The City does not have any special designated areas for investment of CDBG. CDBG funds will be allocated on a citywide basis for activities that are limited-clientele in nature. Other activities such as commercial rehabilitation and public improvements will be limited to eligible area (see **Appendix - Map 1**), with the exception of ADA related improvements which may be carried out on a much wider basis. The City does not receive HOPWA funds.

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

Priority Needs

Table 53 – Priority Needs Summary

1	Priority Need Name	Public Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	CDBG census tracts Citywide program or activity
	Associated Goals	Public Infrastructure Improvements Public Facility Improvements
	Description	Installation of new or rehabilitation of existing public infrastructure and public facility improvements
	Basis for Relative Priority	Needs analysis and City department consultation
2	Priority Need Name	Housing Rehabilitation
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Citywide program or activity
	Associated Goals	Single Family and Multi-Family Housing Rehabilitation
	Description	Rehabilitation of residential properties to address housing and building code deficiencies and deferred maintenance
	Basis for Relative Priority	Based on housing needs analysis, housing market analysis and public input.
3	Priority Need Name	Commercial Rehabilitation
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	CDBG census tracts

	Associated Goals	Commercial Rehabilitation
	Description	Building and facade improvements for commercial properties in support of City's economic improvement strategies
	Basis for Relative Priority	Needs assessment and business owner input
4	Priority Need Name	Public Services
	Priority Level	High
	Population	Non-housing Community Development
	Geographic Areas Affected	Citywide program or activity
	Associated Goals	Homeless Services Public Services
	Description	Social service programs that provide services to low and moderate-income residents including homeless and individuals at risk of homelessness
	Basis for Relative Priority	Needs assessment and service providers input
5	Priority Need Name	Administration
	Priority Level	High
	Population	Other
	Geographic Areas Affected	Citywide program or activity
	Associated Goals	Fair Housing Services Program Administration
	Description	Program oversight and coordination, including fair housing services
	Basis for Relative Priority	HUD required
6	Priority Need Name	Affordable Housing Development
	Priority Level	Low
	Population	Extremely Low Low Moderate

Geographic Areas Affected	Citywide
Associated Goals	Affordable Housing
Description	Financial incentives to support creation of affordable housing
Basis for Relative Priority	Low

Narrative (Optional)

Impediments to Fair Housing: HUD-funded grant recipients are required under various laws not to discriminate in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability. Under the Consolidated Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice 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, or national origin; (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. Since the City began receiving CDBG funds, it has participated in the development of a Regional or multi-jurisdictional AI.

In July 2013, HUD published new rules that substantially revamped existing AI regulations; however, the implementation date for this new fair housing assessment document was postponed until 2019. In May 2015, the City of San Clemente and 15 other Orange County jurisdictions entered into an agreement with consulting firm to prepare a new AI that is compliant with existing AI guidelines. This multi-jurisdictional AI evaluates existing demographic data, past fair housing enforcement activity for each partner community, region and city-specific mortgage lender data, and existing housing and land use public policies. Based on an extensive analysis of this data, and the input of residents, a list of impediments to fair housing choice for the 16-city region has been developed. A corresponding set of action steps to ameliorate these barriers has also been prepared. Impediments and action steps are summarized in **Attachment K**. **NOTE: not all of the impediments identified in the AI may be present in San Clemente.**

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

Table 54 – Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	NA – CDBG may not be used for this type of activity
TBRA for Non-Homeless Special Needs	NA – CDBG may not be used for this type of activity
New Unit Production	CDBG typically cannot be used for this type of activity; however, funds may be used for certain pre-development costs or off-site public improvements. Needs Assessment and Housing Market Analysis indicate there is a shortage of housing units affordable to lower income households.
Rehabilitation	Housing Market analysis data indicates many lower income homeowners are paying a significant amount of their income for housing (housing cost burden and severe housing cost burden). Housing rehabilitation assistance allows these homeowners to address deferred maintenance improvements on their primary residence without increasing the amount of income dedicated to housing. If resources are available, rental housing rehabilitation assistance may be provided.
Acquisition, including preservation	Housing Market analysis data indicates that there is a need for additional housing that is affordable to both renter and owner households. The City's CDBG grant is not large enough to significantly reduce project cost; however, this does not preclude the City from utilizing these resources an incentive to create new housing opportunities.

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

Introduction

Ongoing reductions and fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the four-year time period of the Consolidated Plan. The loss of redevelopment funding had a significant impact on the resources available to the City to undertake affordable housing activities. Due to recent housing development activity, the City does have access to In-lieu Affordable Housing Fee resources. Additionally, housing voucher/certificate resources (via OCHA) and "Good Neighbor Funding," i.e., social service grants from the City's General Fund will be available to carry out activities that support the goals of the Consolidated Plan.

Table 55 - Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	345,089	18,000	0	363,089	1,000,000	Annual HUD CDBG allocation, program income and prior year funds. "Amount Available Remainder of ConPlan" assumes 7% reduction in CDBG funding over a 3-year period.

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

In past years, the City was able to leverage federal funds with local redevelopment funds. In 2012 the State Legislature and the Governor passed legislation to dissolve all redevelopment agencies in the State. As a result, this funding source is no longer available. The City has identified other resources that will be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of March 31, 2016, a total of 142 San Clement households received rental assistance. It is anticipated that a similar number of households will be assisted annual over the four-year period of the Consolidated Plan.
- On an annual basis, the City allocates approximately \$80,000 in General Fund resources to support a variety of social service programs in the community, i.e., Good Neighbor Funding. Several types of services are funded with these resources including funding for homelessness prevention and interim housing for homeless families with children.
- In-lieu Affordable Housing Fund resources generated via the City's Inclusionary Housing Program (IHP) are available to assist nonprofit agencies purchase land or existing housing units for the provision of long-term affordable housing. The IHP was adopted by the City in 1980 in an effort to increase the supply of affordable housing commensurate with new market-rate development within the City. The program requires developers of six or more units to set aside 4% of total units developed for households earning 50% or less of the area median income. The affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee. City staff indicates recent housing development has generated a fund of approximately \$1,000,000. No specific project(s) is presently slated to benefit from this resource; however, these funds should be considered one-time funds as most large housing scale development City is complete and the City approaches build-out.

CDBG does not require matching funds.

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

San Clemente is a nearly "built-out" city with limited remaining vacant land. The City's Housing Element identifies several vacant and underutilized sites that may be suitable for housing development (**Attachment L**). Nearly all vacant residential sites in the City are small, infill parcels located west of Interstate 5. Additionally, the majority of parcels identified in the Housing Element residential sites inventory are within the City's Affordable Housing Overlay. The Overlay is zoned commercial and the only housing which can be built is senior housing or mixed

income housing with 51% to 100% of the units affordable to households earning up to 50% of AMI. The intent of the Overlay Zone is to facilitate the development of affordable rental and for sale housing in the City's commercial and mixed use zones.

Discussion

Funding resources to implement the City's Consolidated Plan are limited. It is anticipated that CDBG funding will continue to be reduced. In recent years, CDBG housing rehabilitation loan repayments have provided the City with some additional funding; however, this source is susceptible to the fluctuations of the economy and thus unpredictable. HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will continue to support OCHA's efforts to secure new rental assistance resources. Additionally, for the foreseeable future, the City will continue to support social service programs serving City residents with Good Neighbor Funding grants. Resources to support the development of new housing are limited. In-lieu Affordable Housing Fund resources may be available for nonprofits to purchase land or existing units. Finally, as outlined above, an inventory of vacant and underutilized land has been developed. Many of the parcels identified in the inventory are also within the City's Affordable Housing Overlay zone. This overlay was designed to encourage the development of affordable housing in commercial and mixed use zones.

SP-40 Institutional Delivery Structure – 91.215(k)

Table 56 - Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Orange County Housing Authority	PHA	Planning Public Housing Rental	Region
211 Orange County	Continuum of care	Homelessness Planning	Region
San Clemente	Government	Economic Development Homelessness Ownership Planning Rental Neighborhood Improvements Public facilities Public services	Jurisdiction
Family Assistance Ministries	Non-profit organization	Homelessness	Jurisdiction
Laura's House	Non-profit organization	Public service	Jurisdiction
Age Well Senior Services	Non-profit organization	Public service	Jurisdiction
Fair Housing Foundation	Non-profit organization	Planning	Jurisdiction
	Other – Fair Housing		
St. Joseph Health Mission Hospital	Non-profit organization	Public service	Regional

Assess of Strengths and Gaps in the Institutional Delivery System

San Clemente has an extensive group of service providers that are capable of delivering a wide variety of quality services for City residents. The City has established good working relationships with these agencies which facilitates the delivery of services. A partial list of these providers is found above (Table 56). The City also continues to work well with OCHA by supporting their efforts to assist the City's lower income renters with housing assistance vouchers and certificates.

With respect to gaps in the institutional deliver system, there is a need to improve the sharing of information that is mutually beneficial to the City and regional players. For example, very little information regarding San Clemente's homeless population was available through the 2013 PITS. Regional planners in charge of the OC-CoC have indicated that future PITS can collect specific homeless data by jurisdiction; however, the estimated cost for this custom count may be cost prohibitive in light of the overall accuracy of the information.

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

Table 57 - Homeless Prevention Services Summary

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

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

There are several service providers available to assist San Clemente residents that are at risk of becoming homeless or that are already homeless. Based on the philosophy that it is less expensive to help someone stay housed than it is to rehouse them, the primary focus of the City's homeless strategy is to support the provision of safety net services for community residents. These services include assessment and case management, supplemental food, limited financial assistance for rent or utilities to prevent eviction or shut off, reduced cost childcare, and reduced cost medical and dental services. Safety net services/assistance enables households at risk of homelessness to redirect limited income toward maintaining their housing.

For those who have slipped into homelessness, the City has established relationships with housing and service providers that will accept referrals from the City. These agencies can address immediate housing, interim housing, and long-term housing needs of the homeless, and also provide critical supportive services. Several service providers are implementing rapid rehousing programs which place homeless households into housing and provide appropriate services to stabilize the household and accelerate the self-sufficiency process.

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

The strength of the City's homeless delivery system is that it has several entry points that are prepared to meet the unique needs of most homeless persons, including families, families with children, veterans, and youths.

As indicated in the Needs Assessment and Market Analysis, there are several shelter beds in the City; however, it is estimated there may be approximately 65 unsheltered homeless. This estimate appears to be consistent with the national and regional estimates; however, law enforcement and local service providers indicate there has been an increase in the number of homeless families and chronic homeless in the City. This trend is also consistent with regional homeless trends.

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

To overcome gaps the City will continue to coordinate resources with local service providers in an effort to ensure residents in need of services/housing are assisted. The City will also continue to cooperate in regional efforts to address the shortage in regional shelter beds and service.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Table 58 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2016	2019	Non-Housing Community Development	CDBG census tracts Citywide	Public Improvements	CDBG: \$400,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 10,000 Households Assisted
2	Public Facility Improvements	2016	2019	Non-Housing Community Development	CDBG census tracts Citywide	Public Improvements	CDBG: \$100,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,000 Persons Assisted
3	Single Family & Multi-Family Housing Rehabilitation	2016	2019	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$300,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
4	Commercial Rehabilitation	2016	2019	Non-Housing Community Development	CDBG census tracts	Commercial Rehabilitation	CDBG: \$80,000	Rental Housing Rehabilitated: 4 Household Housing Units Businesses assisted: 20 Businesses Assisted
5	Homeless Services	2016	2019	Homeless	Citywide	Public Services	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Public Services	2016	2019	Non-Housing Community Development	Citywide	Public Services	CDBG: \$181,700	Public service activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted
7	Fair Housing Services	2016	2019	Administration	Citywide	Administration	CDBG: \$18,000 Other: 500 Other	
8	Program Administration	2016	2019	Administration	Citywide	Administration	CDBG: \$251,000	Other: 4 Other
9	Affordable Housing Development	2016	2019	Affordable Housing	Citywide	Rental Housing	CDBG: \$12,389	Rental Housing Rehabilitated: 1 Household Housing Unit

Goal Descriptions

1	Goal Name	Public Infrastructure Improvements
	Goal Description	Improvements to roadways, streets, sidewalks, and other eligible public infrastructure that primarily benefit low and moderate-income persons.
2	Goal Name	Public Facility Improvements
	Goal Description	Improvements to eligible public facilities and non-public facilities that primarily benefit low and moderate-income residents.
3	Goal Name	Single & Multi-Family Housing Rehabilitation
	Goal Description	Loans and grants to assist qualified low and moderate-income homeowners improve primary residence and rental units (limited to projects up to 4 units with 1 owner occupied unit).
4	Goal Name	Commercial Rehabilitation
	Goal Description	Commercial property building and facade improvements

5	Goal Name	Homeless Services
	Goal Description	Homeless housing and support services (including homelessness prevention services)
6	Goal Name	Public Services
	Goal Description	Support services for low and moderate-income persons
7	Goal Name	Fair Housing Services
	Goal Description	Services to address impediments to access fair housing.
8	Goal Name	Program Administration
	Goal Description	CDBG program oversight and coordination
9	Goal Name	Affordable Housing Development
	Goal Description	Funding for CDBG-eligible pre-development costs or off-site improvements that benefit affordable housing

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

The City of San Clemente is not a HOME Participating Jurisdiction.

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

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

The City of San Clemente does not own or manage any public housing units.

Activities to Increase Resident Involvements

Not applicable

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

Plan to remove the ‘troubled’ designation

Not applicable

SP-55 Barriers to Affordable Housing – 91.215(h)

Barriers to Affordable Housing

The City has little control over market variables that impact the cost of housing, e.g., cost of land, and cost of construction supplies, materials and labor. The City's Housing Element has identified governmental constraints that may have a negative impact to creating affordable housing opportunities.

Redevelopment Dissolution: Housing Set-Aside Funds. Until the dissolution of California's Community Redevelopment Agencies in February 2012, Redevelopment Housing Set-Aside funding was one of the primary sources of financing used for preserving, improving and developing affordable housing. As of 2012, Redevelopment Housing Set-Aside funds are no longer available, as all tax increment funds that previously went to the Agency are now allocated to underlying State and local taxing entities.

Environmental Review. State and federal law (e.g., California Environmental Quality Act and National Environmental Policy Act) require environmental review of proposed discretionary projects; e.g., subdivision maps, zone changes, etc. Costs and delays resulting from the environmental review process are added to the cost of developing housing in the form of carrying costs which are ultimately paid by a buyer or tenant.

Planning and Development Fees. Fees charged by local governments also contribute to the cost of housing. According to the Housing Element, San Clemente assesses all of its impact fees on a per unit basis, regardless of whether the housing unit is part of a single-family or multi-family project. Building division and engineering impact fees total (approximately) \$29,000 per unit.

Permit and Processing Procedures. The processing time required to obtain approval of development entitlements and building permits is sometimes cited as contributing to construction costs. In development parlance, "time is money" and developers can incur significant holding costs while waiting out a delay.

Land Use Controls. The City's General Plan is the policy document that not only establishes the location and amount of land that will be allocated to residential development, but also establishes the intensity of development (in terms of unit densities and total number of units) that will be permitted. While nearly all components or elements of the General Plan contain goals and policies that influence residential development, it is the Land Use Element that has the most direct influence. San Clemente's development standards do not contain any unduly restrictive provisions. Building height, setbacks, lot areas, and parking are generally within the range of other cities in the State.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Redevelopment Dissolution: Housing Set-Aside Funds. The City will encourage developers to include affordable housing units within respective developments and to seek other private and public funding

sources to help reduce the development cost of these units. To the extent that resources are available, Inclusionary Housing in-lieu fees may be made available to assist nonprofit agencies with the purchasing land or existing housing units for the provision of long term affordable housing.

Environmental Review. The City's Housing Element details the impact of environmental review compliance. The Housing Element also identifies the exemptions that state and federal laws provide to streamline the environmental review process. City staff plays an important role by assisting property owners and developers navigate the various environmental review regulations.

Planning and Development Fees. According to the City's Housing Element, housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. Fees assessed by the City are typical for Orange County communities.

Permit and Processing Procedures. The processing time required obtaining approval of development entitlements and building permits is sometimes cited as contributing to construction costs. The City's development approval process is designed to accommodate, not hinder, development and does not unduly constrain housing. The City's Housing Element outlines several time and cost savings development processes including one-stop permitting, pre-permit application meetings, and concurrent permit application processing. For affordable housing project, City staff interacts with project sponsors early in the process to determine project feasibility.

Land Use Controls. In general, land use controls are viewed as necessary to protect the public health, safety and welfare and maintain the quality of life. Such controls are not considered to be a significant constraint on the development of housing. The City has implemented reasonable controls which are appropriate for the community and are detailed in the City's Housing Element.

SP-60 Homelessness Strategy – 91.215(d)

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

The City supports regional homeless service providers that serve the San Clemente area. These agencies have established outreach programs that engage the homeless and assess their needs.

Addressing the emergency and transitional housing needs of homeless persons

As summarized in the **Table 43**, there are 40 interim (transitional) shelter beds in the City (see **Attachment J** for definitions). Shelter beds are earmarked for certain homeless families with children and young adults. Not included on **Table 43** are 44 emergency shelter beds for victims of domestic violence. As previously indicated, the shelter operator indicates that San Clemente residents are not housed at this location in order to best ensure a victim's safety.

In recent years, agencies that traditionally provided transitional housing have begun to integrate a rapid rehousing program into their overall agency services. Such programs are often able to place a household into permanent housing quicker than in past years utilizing the emergency shelter to transitional housing to permanent housing model. Homeless Services has been listed in the Consolidated Plan as a high priority need in order to facilitate ongoing support for these service providers and their efforts to serve the homeless.

Pursuant to current HUD directives, the OC-CoC has established a coordinated entry system whereby homeless individuals seeking shelter and services are directed to a streamline system that facilitates access to appropriate housing and services for families and individuals. The system screens applicants for eligibility for services, such as homelessness prevention, rapid re-housing, emergency shelter, affordable housing, permanent supportive housing, and other interventions. The needs and strengths of each household are assessed to determine which interventions will be most effective and appropriate, while also prioritizing people for assistance based on the severity of their needs. The system is currently in the testing phase with implementation Countywide by Fall 2016.

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

As previously above, the City homeless strategy is based on the proposition that it is less expensive and disruptive for a household to remain housed in their existing home than to be rehoused. To this end, the City will focus its limited CDBG (and other public) resources with agencies that provide a variety of safety net services aimed at preventing households from becoming homeless. These services include case management, food, reduced-cost childcare, low cost medical care, and rent/utility assistance.

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

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

As required by HUD, the City's Housing Rehabilitation program staff will ensure that all housing units that were built prior to 1978, and that receive CDBG-funded rehabilitation assistance, are tested for lead based-paint. If lead is found, additional funds may be allocated to a project for the specific purpose of creating a home free of lead paint hazards.

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

During consultation with the State Department of Public Health, State staff provided information provided regarding the number of children with high blood lead values; however, data was not solely attributed to lead based-paint. Without this specific information, the City can only address potential lead poisoning and hazards within the programs it funds. As indicated above, the City will test all properties constructed prior to 1978 that are part of the City's housing rehabilitation programs for lead paint hazards, and if possible, a work plan will be developed to eliminate lead hazards.

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

Current Housing Rehabilitation Program policies and procedures require all properties constructed prior to 1978 to be tested for lead. If lead is found, it must be removed or encapsulated.

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

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

According to the U.S. Census Bureau, 8.6% of the City's population is living at or below the poverty level. The Census Bureau reports that 5.9% of San Clemente residents age 65 and older are living in poverty as are 11.5% of residents age 18 years and younger. [1]

The City has identified several activities and services that it can be implemented to combat poverty:

- Implement housing programs (including housing rehabilitation assistance) for lower income households with children and seniors.
- Support rental assistance programs provided by the Orange County Housing Authority for very low-income renters, especially senior households and households with children.
- Support homeless prevention services for individuals presently housed but at risk of losing their residence. As resources permit, assist those already homeless in need of emergency shelter, transitional housing, rapid rehousing and permanent supportive housing.
- Support public services that provide a social safety net for lower income households such as childcare, medical and dental care, in-house services for seniors, and food, clothing and other forms of financial assistance for households at risk of becoming homeless.
- Implementation of the City's Economic Development Strategy for the purpose of creating an environment that is conducive to building and sustaining businesses and employment opportunities, especially for lower income persons.

[1] 2009-2013 American Community Survey 5-Year Estimates, Table #S1701.

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

The City's anti-poverty strategy calls for assisting lower income households, especially senior households and households with children. The support for OCHA's rental assistance programs for very low-income renters is consistent with the City's affordable housing plan. Additionally, safety net programs (e.g., food bank and childcare) assist households at risk of becoming homeless by helping them to redirect limited income toward maintaining housing. Funds will also be allocated to support housing and commercial rehabilitation activities, which will help ensure households live in safe and decent housing, and expand economic opportunities, respectively. As resources permit, incentives for the development of affordable housing will be provided to create additional housing opportunities for lower income households.

SP-80 Monitoring – 91.230

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

The goal of the City's monitoring efforts will be to ensure compliance with CDBG program requirements thus protecting the public's investment in the community.

CDBG funded activities carried out by subrecipients will be required to submit quarterly accomplishment reports to program staff. Public improvement reports will be provided upon request and will include a description of project progress and dates for milestones such as completion date. Public service providers will be required to provide information regarding the number of clients served and the overall progress of their programs. City staff will also undertake on-site monitoring to review subrecipients' performance, quality of services, and grant administration abilities. If and when necessary, corrective actions will be recommended by the City to ensure compliance with applicable federal laws and regulations. For agencies that receive regular funding from the City, and that consistently perform well, monitoring will be undertaken every other year. First-time funded agencies or agencies demonstrating administrative/programmatic issues will be monitored annually until grant management competence is proven. All quarterly report information will be input on a regular basis into IDIS. Year-end accomplishment information will be submitted to HUD as part of the Consolidated Annual Performance and Evaluation Report (CAPER).

With respect to minority and women owned businesses, the City will continue to solicit the interest of a wide variety of companies and firms to undertake HUD-funded activities.

VI. 2016-2017 Annual Action Plan

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

Introduction

Ongoing reductions and fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the four-year time period of the Consolidated Plan. The loss of redevelopment funding had a significant impact on the resources available to the City to undertake affordable housing activities. Due to recent housing development activity, the City does have access to In-lieu Affordable Housing Fee resources. Additionally, housing voucher/certificate resources (via OCHA) and “Good Neighbor Funding,” i.e., social service grants from the City’s General Fund will be available to carry out activities that support the goals of the Consolidated Plan.

Table 59 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	345,089	18,000	0	363,089	Annual HUD CDBG allocation, program income and prior year funds. “Amount Available Remainder of ConPlan” assumes 7% reduction in CDBG funding over a 3-year period.
						1,000,000	

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

In past years, the City was able to leverage federal funds with local redevelopment funds. In 2012 the State Legislature and the Governor passed legislation to dissolve all redevelopment agencies in the State. As a result, this funding source is no longer available. The City has identified other resources that will be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of March 31, 2016, a total of 142 San Clement households received rental assistance. It is anticipated that a similar number of households will be assisted annual over the four-year period of the Consolidated Plan.
- On an annual basis, the City allocates approximately \$80,000 in General Fund resources to support a variety of social service programs in the community, i.e., Good Neighbor Funding. Several types of services are funded with these resources including funding for homelessness prevention and interim housing for homeless families with children.
- In-lieu Affordable Housing Fund resources generated via the City's Inclusionary Housing Program (IHP) are available to assist nonprofit agencies purchase land or existing housing units for the provision of long-term affordable housing. The IHP was adopted by the City in 1980 in an effort to increase the supply of affordable housing commensurate with new market-rate development within the City. The program requires developers of six or more units to set aside 4% of total units developed for households earning 50% or less of the area median income. The affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee. City staff indicates recent housing development has generated a fund of approximately \$1,000,000. No specific project(s) is presently slated to benefit from this resource; however, these funds should be considered one-time funds as most large housing scale development City is complete and the City approaches build-out.

CDBG does not require matching funds.

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

As indicated in the Strategic Plan, San Clemente is nearly “built-out” with limited vacant land. The City’s Housing Element identifies several vacant and underutilized sites that may be suitable for housing development (**Attachment L**). Nearly all vacant residential sites are small, infill parcels located west of Interstate 5. Additionally, the majority of parcels identified in the Housing Element residential sites inventory are in the City’s Affordable Housing Overlay. The intent of the Overlay Zone is to facilitate the development of affordable rental and for sale housing in the City’s commercial and mixed use zones.

Discussion

Funding resources to implement the City’s 2016-2017 Annual Action Plan are limited. HUD has notified the City that its 2016-2017 CDBG grant is \$345,089. This amount is \$13,683 (4.13%) more than the City’s 2015-2016 CDBG allocation; however, it is worth noting that since the City became a CDBG recipient community in 2006, its CDBG allocation has decreased by 44.5%. It is anticipated that CDBG funding will continue to be reduced. CDBG-funded housing rehabilitation loan repayments have provided the City with additional source of funding; however, loan repayments are susceptible to the fluctuations of the economy and are unpredictable.

HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will continue to support OCHA’s efforts to secure new rental assistance resources. Additionally, for the foreseeable future, the City will continue to support programs serving City residents with Good Neighbor social service grants. As outlined above, San Clemente has identified vacant and underutilized land that may be suitable housing development, additionally, in lieu fees for affordable housing development may also be available to support affordable housing activities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Table 60 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2016	2019	Non-Housing Community Development	CDBG census tracts	Public Improvements	CDBG: \$129,311	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4,100 Persons Assisted
2	Single Family Housing Rehabilitation	2016	2019	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$93,000	Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	Public Services	2016	2019	Non-Housing Community Development	Citywide	Public Services	CDBG: \$51,762	Public service activities other than Low/Moderate Income Housing Benefit: 2,600 Persons Assisted
4	Commercial Rehabilitation	2016	2019	Non-Housing Community Development	CDBG census tracts	Commercial Rehabilitation	CDBG: \$20,000	Businesses assisted: 9 Businesses Assisted
5	Fair Housing Services	2016	2019	Administration	Citywide	Administration	CDBG: \$4,500	Other: 120 Other
6	Program Administration	2016	2019	Administration	Citywide	Administration	CDBG: \$64,516	Other: 1 Other

Goal Descriptions

1	Goal Name	Public Infrastructure Improvements
	Goal Description	Sidewalk improvements
2	Goal Name	Single Family Housing Rehabilitation
	Goal Description	Housing rehabilitation assistance to improve residential properties
3	Goal Name	Public Services
	Goal Description	Social services for seniors, victims of domestic violence, youths and lower income persons
4	Goal Name	Commercial Rehabilitation
	Goal Description	Business façade improvements
5	Goal Name	Fair Housing Services
	Goal Description	Outreach, education and enforcement services
6	Goal Name	Program Administration
	Goal Description	CDBG program oversight and coordination

Projects

AP-35 Projects – 91.220(d)

Introduction

The following activities have been allocated CDBG funds for Fiscal Year (FY) 2016-2017.

Table 61 - Project Information

#	Project Name
1	Sidewalk Improvements
2	Home Rehabilitation Program
3	Commercial Facade and Sign Grants
4	Age Well Senior Services
5	Camino Health Center
6	Laura's House
7	Fun On The Run
8	Fair Housing Foundation
9	CDBG Program Administration

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

The City will allocate a portion of its CDBG funds for activities that address the housing and service needs of the elderly and lower income households, especially those at risk of becoming homeless. According to data from the Market Analysis these households are contributing significant portions of their income to maintain their housing. Consistent with the City's Homeless Strategy, resources will be allocated to help these households remain housed in place rather than fall into homelessness. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding for San Clemente households. The City's housing rehabilitation program will also focus its efforts to assist elderly homeowners undertake improvement of respective residences to address specific household needs.

AP-38 Project Summary

Project Summary Information

1	Project Name	Sidewalk Improvements
	Target Area	CDBG census tracts
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$129,311
	Description	CDBG funds for sidewalk improvements - Calle Puento
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4,100 individuals will benefit from sidewalk improvements
	Location Description	CT: 421.07 BG: 2 and CT: 421.08 BG: 4 (54.61% Low and Moderate-Income)
	Planned Activities	Construction of sidewalks, curbs and ADA ramps
2	Project Name	Home Rehabilitation Program
	Target Area	Citywide
	Goals Supported	Single Family Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$93,000
	Description	CDBG funds (\$75,000 in FY 16-17 funds plus \$18,000 in program income) for housing rehabilitation loans or grants to address housing/building code deficiencies and deferred building maintenance.
	Target Date	6/30/2017

Estimate the number and type of families that will benefit from the proposed activities	6 owner occupied housing units
Location Description	Citywide
Planned Activities	Rehabilitation of owner occupied housing units
3 Project Name	Commercial Facade Sign Grants
Target Area	CDBG census tracts
Goals Supported	Commercial Rehabilitation
Needs Addressed	Commercial Rehabilitation
Funding	CDBG: \$20,000
Description	Grants to update or upgrade business signs or facades
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	To be determined
Location Description	To be determined but located within CDBG-eligible Census Tract Block Groups
Planned Activities	Grants to business owners to update or upgrade signs and/or facades
4 Project Name	Age Well Senior Services
Target Area	Citywide
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$6,000
Description	Case management and support services for seniors and frail elderly

	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	250 seniors and frail elderly
	Location Description	Citywide
	Planned Activities	Case management and in-home support services for seniors and frail elder
5	Project Name	Camino Health Center
	Target Area	Citywide
	Goals Supported	Commercial Rehabilitation
	Needs Addressed	Public Services
	Funding	CDBG: \$18,000
	Description	Low cost medical and pediatric dental services for low and moderate-income persons
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	1,750 low and moderate-income persons
	Location Description	1031 Avenida Pico, Ste. 104, San Clemente CA
	Planned Activities	Primary medical care and pediatric dental services at reduced cost for lower income persons and indigents
6	Project Name	Laura's House
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services

	Funding	CDBG: \$10,000
	Description	Counseling and support services for victims of domestic violence
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	250 individuals
	Location Description	Citywide
	Planned Activities	Counseling and support services for victims of domestic violence
7	Project Name	Fun On The Run
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,762
	Description	Youth recreation program
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 350 youths
	Location Description	Citywide
	Planned Activities	After school recreation and homework assistance program with a focus on low and moderate-income children.
8	Project Name	Fair Housing Foundation
	Target Area	Citywide

Goals Supported	Fair Housing Services
Needs Addressed	Administration
Funding	CDBG: \$4,500
Description	Fair housing outreach, education and enforcement services with the goal to reduce and eliminate impediments to the fair access of housing
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	120 households
Location Description	Citywide
Planned Activities	Fair housing outreach, education and enforcement services including: landlord, tenant and property management fair housing training; community outreach and education; complaint investigation and enforcement services
9 Project Name	CDBG Program Administration
Target Area	Citywide
Goals Supported	Program Administration
Needs Addressed	Administration
Funding	CDBG: \$64,516
Description	CDBG program oversight and coordination
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	Not applicable
Location Description	910 Calle Negocia Ste. 100, San Clemente CA

	Planned Activities	Program oversight and coordination including management of public service grants, housing and commercial rehabilitation programs, and preparation of required applications and reports.
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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

Some activities slated for CDBG-funding during FY 2016-2017 will be available on a citywide basis to income eligible individuals and households. These activities include public services and housing rehabilitation. Activities such as commercial rehabilitation and sidewalk improvements will be limited to specific areas of the City where a majority of residents meet HUD’s income limits. A map of the City’s CDBG Eligible Areas is provided provides in the Consolidated Plan Appendix (**Map 1: CDBG Eligible Areas Map**).

Table 62 - Geographic Distribution

Target Area	Percentage of Funds
CDBG census tracts	41
Citywide	59

Rationale for the priorities for allocating investments geographically

Funding is predominately allocated on a citywide basis as the City’s primary intent is to serve lower income households that are in need of services/assistance regardless of where they live in the City. As the City’s CDBG-eligible areas tend to be older sections of the City, area wide activities (e.g., public improvements) will help to improve and sustain these neighborhoods.

Discussion

As indicated above, CDBG funds will be mainly allocated to programs that serve lower income residents regardless of where they live (approximately 60% of available funds). The balance will be allocated to activities that will benefit residents of areas identified by HUD as having a significant number of lower income residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will utilize limited CDBG funds and program income to provide housing rehabilitation loans and grants to eligible homeowners. No CDBG funding is allocated in 2016-2017 for homeless or other special needs populations housing.

Table 63 - One Year Goals for Affordable Housing by Support Requirement

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

(16-17 Action Plan)

Table 64 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	6
Acquisition of Existing Units	0
Total	6

Discussion

Due to limited resources, the City will focus 2016-2017 CDBG funds on housing rehabilitation of existing owner-occupied housing units. While not the primary focus of the program, some special-needs households (senior and disabled) may be assisted during the year by this program. City general funds will be allocated to support homeless programs including homelessness prevention, interim housing and supportive services.

AP-60 Public Housing – 91.220(h)

Introduction

San Clemente 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

San Clemente does not own or manage public housing.

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

Introduction

As outlined in the Strategic Plan, the City's homeless strategy places an emphasis on preventing homelessness. Based on the proposition that it is less expensive and disruptive to keep a household housed in place, the City will use CDBG resources to fund programs that provide services aimed at helping households to maximize the amount of income they can contribute toward housing. Services to be funded with CDBG include reduced cost after-school childcare, medical services, and case management/services for seniors. Funds will also be allocated to support counseling services for victims of domestic violence – these services include preparation of safe housing plans for client households. Non-CDBG funds will be utilized to support homelessness prevention, support services and interim housing for homeless families.

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 of San Clemente does not directly fund homeless outreach services; however, the City does support agencies that work directly with both sheltered and unsheltered homeless populations. Agencies such as Family Assistance Ministries conduct extensive outreach and vulnerability assessments throughout San Clemente and neighboring communities. Other agencies conduct similar outreach and assessment services for specific homeless populations such as victims of domestic violence and transitional age youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

No 2016-2017 CDBG funding is allocated to directly support emergency and transitional housing; however, as indicated in the Housing Market Analysis, there are 40 transitional shelter beds in the community managed by two agencies. Shelter beds are typically earmarked for special need populations such as homeless families and transitional age youth. As previously indicated, there are shelter beds for victims of domestic violence in the City; however, because City residents are typically not housed at this location, they are not included as a shelter resource.

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

As outlined above, the City will focus its CDBG resources on preventing homelessness as opposed to funding services that assist those already homeless. It is important to note that the City's strategy does not exclude funding such programs. The City will continue to support agencies that provide these services by providing Certifications of Consistency with the Consolidated Plan (if applicable and merited), and will also continue to support the regional CoC as it seeks resources to address regional homeless issues.

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.

It is the City's strategy to help a household at risk of becoming homeless, to stay in their home. The City will continue to participate in regional homeless planning efforts including the OC CoC's Discharge Plan, which aims to prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

Discussion

The City's homeless strategy is to help prevent homelessness and to support local service providers' efforts to seek additional resources. CDBG funds will be allocated to safety net services that will help households at risk of homelessness redirect limited income toward housing. City general funds will be allocated to support agencies that provide a variety of shelter and support services for the homeless.

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction:

Barriers to affordable housing and actions to overcome barriers have been previously discussed in the Consolidated Plan and are outlined in the City's Housing Element.

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

Housing Resources: The City will encourage developers to seek private and other public funding sources to reduce the development cost of housing units. To the extent that funds are available, Inclusionary Housing in-lieu fees may be made available to assist nonprofit agencies purchase land or existing housing units in order to create new long-term affordable housing opportunities.

Environmental Review. The Housing Element identifies exemptions that state and federal laws provide to streamline the environmental review process. City staff will assist property owners and developers navigate the various environmental review regulations to help reduce the holding cost associated with the time needed to comply with these reviews.

Planning and Development Fees. The City does not typically offer fee waivers; however, the City Council may approve a waiver, offer deferred or reduced fees, or supplement fees with funds from the In-lieu Fee Fund, for affordable housing projects.

Permit and Processing Procedures. The City's Housing Element outlines several time and cost savings development processes aimed at reducing the holding time of housing developers. For affordable housing project, City staff will interact with project sponsors early in the process to determine project feasibility and will assist the developer through the entitlement process.

Land Use Controls. In general, land use controls are necessary to protect the public health, safety and welfare and maintain the quality of life. The City has implemented reasonable controls which are appropriate for the community.

Tax Policies: There is no local tax.

Discussion:

The City's Housing Element outlines a comprehensive plan to address barriers to affordable housing. The Consolidated Plan mirrors this plan.

AP-85 Other Actions – 91.220(k)

Introduction:

Outlined below are the actions the City will implement to address the sub-strategies of the Strategic Plan.

Actions planned to address obstacles to meeting underserved needs

The City will allocate a portion of its CDBG funds for activities that address the service needs of the elderly and lower-income households. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding especially for senior and low-income households. The City's housing rehabilitation programs will be available to assist elderly homeowners undertake improvement of respective residences to address specific household needs.

Actions planned to foster and maintain affordable housing

The City of San Clemente has identified the actions it will undertake during FY 2016-2017 to foster and maintain affordable housing. The Consolidated Plan identified programs such as Housing Rehabilitation assistance as the means to maintain and improve housing currently available to low and moderate-income residents. By providing deferred payment loans and grants, lower income households are able to rehabilitate their residence to meet basic housing quality standards and incur zero or minimal additional housing costs. An estimated six housing units will be assisted with CDBG funds during the 2016-2017 Program Year.

Actions planned to reduce lead-based paint hazards

To ensure compliance with program regulations, all housing units, that were constructed before 1978, that are rehabbed with CDBG resources, will be tested for lead-paint hazards. If lead is found, additional assistance may be provided to eliminate or mitigate lead hazards.

Actions planned to reduce the number of poverty-level families

As previously outlined, approximately 8.6% of the City's population is living at or below the poverty level including 11.5% of children under the age of 18 and 5.9% of seniors (age 65 and older). During FY 2016-2017, the City will fund the following activities with the goal of reducing the number of households living in poverty:

- Housing programs including rehabilitation for lower income and senior homeowners, and rental assistance for very low-income renters (the latter via the Orange County Housing Authority).
- Public services that provide free or reduced cost services to lower income households that will help to improve quality of life.
- Commercial property upgrades to improve neighborhood aesthetics and expand economic opportunities for lower income residents.

Actions planned to develop institutional structure

The City has made an effort to develop an institutional structure that will help identify and access resources to improve the community. The City will continue to work with nonprofit public entities to deliver public services. As a member of the Orange County Continuum of Care Community Forum, the City will provide critical information to the County of Orange for preparation of the County's Continuum of Care Homeless Assistance grant application to HUD. The City will also continue to assist the OCHA implement its Five-year Public Housing Authority (PHA) Plan for the provision of rental assistance vouchers and certificates.

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

The City of San Clemente does not operate public housing. OCHA provides rental assistance in the community. Federal legislation requires that the Housing Authority prepare five-year and one-year plans that highlight its mission, goals and objectives as it relates to public and assisted housing programs. The City will review the Authority's plans and will provide OCHA the opportunity to review and consult with the City regarding its Consolidated Plan. The goal of this cross-consultation is to provide consistent and coordinated housing services for City residents.

San Clemente has also developed positive working relationships with private and nonprofit housing developers (e.g. Jamboree Housing). Ongoing relationships with local nonprofits also promotes the efficient and effective use of limited resources public resources for housing.

Discussion:

One HUD-required strategy not discussed above are the City's action steps to affirmatively further fair housing via the Analysis of Impediments (AI) for Fair Housing Choice. As indicated in the Strategic Plan, the City's current AI is summarized in the Appendix (**Attachment K**). Action steps to be taken during FY 2016-2017 are also found in **Attachment K**.

Program Specific Requirements

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

Introduction:

Each HUD program that is covered by the Consolidated Plan regulations must address certain program specific requirements. Below are the requirements for the CDBG program as prescribed by the Consolidated Plan template.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

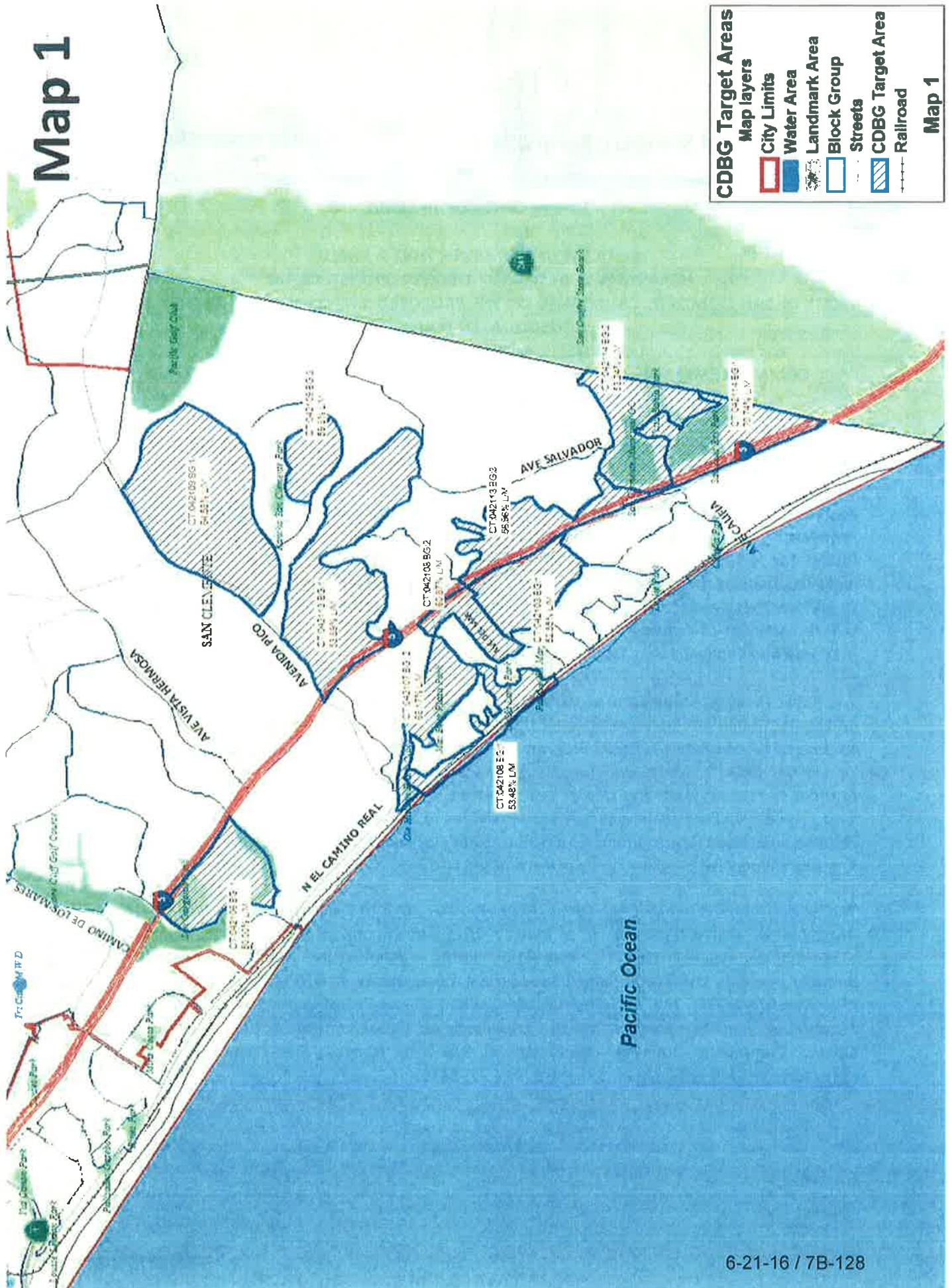
1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG 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 overall 70% benefit for low and moderate-income requirement during the one-year 2016 Program Year.

Appendix and Standard Form 424

Map 1



CDBG Target Areas

Map layers

- City Limits
- Water Area
- Landmark Area
- Block Group
- Streets
- CDBG Target Area
- Railroad

Map 1

TO BE PUBLISHED: 5/27/16

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN THAT A PUBLIC HEARING WILL BE HELD BY THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, ON THE PROPOSED SUBMISSION OF THE 2016-2019 CONSOLIDATED PLAN AND 2016-17 ANNUAL ACTION PLAN COMMENCEMENT OF THE THIRTY (30) DAY COMMENT PERIOD 5/27/16 – 6/27/16

Community Development Block Grant Application (CDBG) the Consolidated Plan 2016-2019 and the Annual Action Plan for 2016-17.

As a recipient of Community Development Block Grant (CDBG) funds, the City of San Clemente is required to prepare a Consolidated Plan every three to five years. The City is also required to update the related Action Plan on an annual basis. The Consolidated Plan is a strategic plan that identifies housing and community needs, strategies to address needs, and programs/resources to address these needs. The Action Plan delineates proposed activities to be funded under the U.S. Department of Housing and Urban Development's (HUD) CDBG program. These plans are prepared in compliance with federal regulation [24 CFR 91].

The Public Hearing, preparation of the draft Consolidated Plan and the draft Annual Action Plan, and 30 day public comment period meet the statutory requirements for planning and application for federal funds under the CDBG Program.

In order to receive funds the City of San Clemente must prepare an Annual Action Plan every year. The Action Plan delineates proposed activities to be funded under the U.S. Department of Housing and Urban Development (HUD), Community Development Block Grant (CDBG) Program. The City will receive program funds in the amount of \$345,089 for Fiscal Year 2016-2017.

The 30 day Public Comment Period for the draft 2016-2019 Consolidated Plan and the 2016-17 Annual Action Plan will commence on May 27, 2016 and will end on June 27, 2016. These draft plans shall be available for public inspection during regular business hours at City Hall, 100 Avenida Presidio, the Community Development Department at 910 Calle Negocio, the San Clemente Library at 242 Avenida Del Mar in San Clemente, or on the City's web site at <https://www.san-clemente.org>. Written comments on the plans may be submitted to Denise Obrero, Community Outreach Coordinator at 910 Calle Negocio, San Clemente, 92673, or obreros@san-clemente.org on or before June 27, 2016.

For Fiscal Year 2016-2017 the City of San Clemente proposes the following:

ACTIVITY	FUNDING SOURCE	FUNDING AMOUNT
FEDERAL FUNDED ACTIVITIES		
Street Improvements: Sidewalk replacement program and downtown project	CDBG	\$129,311
Housing Rehabilitation: Housing rehabilitation assistance for owner-occupied and renter-occupied housing.	CDBG	\$ 75,000
Public Services: Health care, senior, youth recreation, domestic violence, and other Low/Mod household assistance programs	CDBG	\$ 51,762
Commercial Rehabilitation: Façade improvement grants (awnings, signage, lighting)	CDBG	\$ 20,000
CDBG Administration & Planning: Program oversight and coordination, including Fair Housing contract services cost	CDBG	\$ 69,016
TOTAL FY 2016-17 HUD GRANT	CDBG	\$345,089

Notice is hereby given that an initial environmental assessment for the above item was processed and completed in accordance with the California Environmental Quality Act (CEQA). Staff determined that the above item is categorically exempt in accordance with CEQA, Article 19, Section 15301.

If you challenge this project in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City of San Clemente at, or prior to, the Public Hearing.

NOTICE IS FURTHER GIVEN that said Public Hearing will be held at the meeting of the City Council on June 21, 2016 at 6:00 p.m. in City Hall Council Chambers, 100 Avenida Presidio, San Clemente, California. All interested persons are invited to attend said hearings or by written communication to the City Council to express their opinion for or against the request.

JOANNE BAADE
City Clerk and Ex-Officio
Clerk of the Council

**CITY OF SAN CLEMENTE 2013-2021 HOUSING ELEMENT ONLINE SURVEY
SUMMARY OF PUBLIC COMMENTS**

As part of the Housing Element update, the City conducted an online survey to solicit input on housing needs and housing programs. To publicize the survey, the City announced its availability on:

- City website
- City Facebook page

The survey was made available online in English and Spanish from August 2015 through the end of November 2015. A total of 143 surveys were collected electronically. The survey was made available to tenants and homeowners that reside in the City, as well as non-residents and non-resident landlords. The majority of survey respondents (about 61 percent) identified as homeowners in the City of San Clemente. The survey respondents answered questions regarding housing and community needs in San Clemente. The following responses are the top responses provided (in order of number of responses):

The top three housing challenges in the City, as identified by survey respondents were:

- High housing cost (78 percent)
- Neighborhood Physical Condition (57 percent)
- Supply of new housing to rent (54 percent)

When asked to select the top three groups in the community with the greatest need for housing and related services, respondents prioritized:

- Young adults (86 percent)
- Seniors (78 percent)
- Persons with disabilities (64 percent)

Survey participants were also prompted to evaluate whether there existed an adequate supply of specific housing types within the City. The majority of respondents suggested the City had *enough*:

- Townhomes and condominiums (72 percent)
- Single family homes (68 percent), and
- Rental apartments (54 percent)

The majority of respondents also reported there was *not* an adequate supply of:

- Housing for the homeless (72 percent),
- Housing for persons with disabilities (69 percent), or
- Senior housing (61 percent).

Respondents agreed that the top three types of housing programs and activities that the City should concentrate on over the next eight years included:

- Affordable housing development (40 percent)
- Code enforcement (40 percent)
- Housing for seniors (39 percent)

The online survey also presented respondents with lists of housing-related challenges and opportunities that San Clemente residents and stakeholders had identified in the previous Housing Element (2008-

2013) workshops. Respondents suggested that the top items that posed the greatest challenges in the City were:

- Affordability of housing (75 percent)
- Increased traffic and neighborhood parking impacts (65 percent)
- Housing for the elderly (43 percent)

They also considered that the top opportunities for the City were:

- An improving economy (64 percent)
- Redeveloping and creating special places (45 percent)
- Availability of different modes of transportation (45 percent)

Appendix A: Public Outreach

A.1 Community Workshops – Public Comments

San Clemente Community Workshop #1: September 23, 2015

Location: Community Development Department Offices

Substandard Housing: Substandard housing is a problem in San Clemente. There are a number of absentee owners that are unwilling to fix their properties. City officials need to force owners to bring properties up to code.

Affordable Housing: The current available capacity of affordable housing in San Clemente does not meet the needs of its residents. The City should consider expanding current affordable housing complexes or invest in the development of new affordable units.

Criminal Activity: Criminal and gang activities are prevalent along El Camino Real.

Special Needs Housing: Special needs housing to be located in higher-income, safe areas. There is a need for units that are accessible for persons with disabilities.

Emergency Housing/Transitional Housing: Homeless shelters should be put in the south-end (more dangerous part) of San Clemente.

Sober-living housing: Locate sober-living homes outside of San Clemente.

Affordability of Housing for Large Families: Housing is expensive in San Clemente, especially for large families that are living on one income. San Clemente needs more apartments and less single-family homes.

Funding for Affordable Housing: The lack of funding to support affordable housing and programs to occupy youth are contributing to the increase in crime, gang activity and graffiti in San Clemente. If more money is invested in youth programs, the criminal activity and youth participation in gangs would decrease. There is a need for more funding for new programs and services for low-, very low- and moderate income residents. Alternatively, if residents could afford their rents, they would be able to use their discretionary funds to put their kids into any youth programs they chose.

Cooperation between City and Developer: City officials need to work with developers. Land is needed to build low-income and market rate housing. Developers need the land and entitlement to be able to begin application process for specific funding for the development of affordable housing units (ex. Cap and Trade funding)

Hotel/Motel conversion: Residents suggest the conversion of hotel/motel units into affordable housing.

Acquire and Rehabilitate Housing: It is very expensive to purchase in this market to attempt to rehabilitate housing into affordable units.

Housing for the Elderly: San Clemente is in need of affordable senior housing for its senior population.

Housing Discrimination: Maintenance and upgrades are needed in the current rental housing stock available in San Clemente, but residents are afraid of repercussions if they speak up. Landlords are raising rents if you report your maintenance issues.

San Clemente Community Workshop #2: September 24, 2015

Location: City of San Clemente Community Center

Homeless Persons: The City should identify and collaborate with local churches to operate emergency shelters for the homeless. Family homelessness is also becoming an issue for the City. High rents in the City make it difficult for homeless families, particularly single-parent homeless families, to find housing. These residents are often forced to find housing outside of the City, even though many have close ties to San Clemente and work in the City.

Absentee Landlords: Residents also specifically noted an issue with absentee landlords in the City. This is of particular concern when the landlord fails to properly maintain the home for their tenants.

Affordable Housing: Many residents cited the need for affordable housing in the City. Those who already owned homes in the City were disappointed that their children and other family members could not afford to find housing (either rental or homeownership) in San Clemente. Residents who are currently residing in the City's affordable units expressed concern about the lack of maintenance in these homes as well as the unauthorized dividing of a single apartment home into multiple units rented to different households.

A.2 Outreach Flyer

City of San Clemente Housing Element Community Workshops



Join the City of San Clemente for a Community Workshop to discuss the update of the City's Housing Element, a key component of the City's General Plan. The City invites you to participate in a discussion about housing issues in our community.



Date: Wednesday, September 23, 2015
Time: 6:30 PM – 8:00 PM
Location: Community Development Department Offices
(Rancho SC Business Park)
910 Calle Negocio #100
San Clemente, CA 92673



Date: Thursday, September 24, 2015
Time: 6:30 PM – 8:00 PM
Location: City of San Clemente Community Center
100 N. Calle Seville
San Clemente, CA 92672



*Please also complete a short survey to assist with this effort.
The survey can be found online at:
[www.surveymonkey.com/s/SanClemente HE](http://www.surveymonkey.com/s/SanClemente_HE)*

*For questions or additional information please contact:
Denise Obrero, Housing Programs Planner
ObreroD@san-clemente.org | (949) 361-6188*



The City of San Clemente will provide reasonable accommodations toward the inclusion of all participants, including language accommodations. Please contact Denise Obrero at (949) 361-6188. Ample time is required to determine the needs of each request.

Ciudad de San Clemente

Talleres Comunitarios del Elemento de Vivienda



Únete a la Ciudad de San Clemente para un taller comunitario para discutir la actualización del Elemento de Vivienda de la Ciudad, un componente clave del Plan General de la Ciudad. La ciudad invita su participación en una discusión sobre cuestiones de vivienda en nuestra comunidad.



Fecha: Miércoles, Septiembre 23, 2015
Hora: 6:30 PM - 8:00 PM
Lugar: Oficinas del Desarrollo Comunitario
(Rancho SC Business Park)
910 Calle Negocio #100
San Clemente, CA 92673



Fecha: Jueves, Septiembre 24, 2015
Hora: 6:30 PM - 8:00 PM
Lugar: Centro Comunitario de San Clemente
100 N. Calle Seville,
San Clemente, CA 92672



*También le invitamos a ayudarnos en este esfuerzo al llenar una encuesta.
La encuesta se encuentra en línea en:*

www.surveymonkey.com/s/SanClemente_HE_Spanish

Para preguntas, o información adicional, por favor póngase en contacto con :
Denise Obrero, Housing Programs Planner
ObreroD@san-clemente.org | (949) 361-6188



La Ciudad de San Clemente proveera alojamiento razonable para incluir a todos los que deseen participar. Por favor, póngase en contacto con Denise Obrero al (949) 361-6188 Se requiere suficiente tiempo para determinar las necesidades de cada solicitud.

A.3 Sign-In Sheets



CITY OF SAN CLEMENTE
Housing Element Community Workshop
Wednesday, September 23, 2015, 6:30 to 8:00 PM

Sign-In Sheet	Print Name	Organization	Address	Email	Telephone No.
1	LINDA TANG	Kennedy Commission	1770 Cowan Ave Ste 300 Irvine 92614	linda.tang@cityofsanclm.com	949 498 6450
2	John P. Rox	John P. Rox			
3	Lara Danback	CFIT			
4	Larry Culbertson	SCHS	270 Ave Roma Long Beach, CA 90801		714 768 2
5	Terence Wells	ISFN	147 W. Melrose St		949 498 6450
6	Gayle (mom)				
7	Wanda				
8	John G. Fink	JANBOEC	23 CALLE LINDAS	John G. Fink	949 360 0037
9	CANDY RUIZ	JOHN STEWART CO			949 498 6450
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CITY OF SAN CLEMENTE

Housing Element Community Workshop

Wednesday, September 23, 2015, 6:30 to 8:00 PM

Sign-In Sheet				
1	Print Name	Organization	Address	Telephone No.
2	Bob Costello	NCCL	301 AVE ARLENA	909-909-9042
3				@GMAIL.COM
4				
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CITY OF SAN CLEMENTE

Housing Element Community Workshop

Thursday, September 24, 2015, 6:30 to 8:00 PM

Sign-In Sheet				
1	Print Name	Organization	Address	Telephone No.
2	Maria Ramirez			949-273-7790
3	Marta Smith	H.A.C.		949-466-2915
4	Susan Whitaker	ESC		Smithville Center
5	DDN Brown			
6	EDGAR MEDINA	DC YOUTH RELATIONS		
7	Marc Margel	FAM		Marc Margel Family Assistance Org
8	Susan Parholer	wellness, prevention center		Susan Parholer
9	Susan Munday	Newport Behaviors		Population Solutions
10				newportbehaviors.com
11	Margarita Farias			
12	Melinda Paez			949-542-0254
13	Wesley Davis	Resident		
14				
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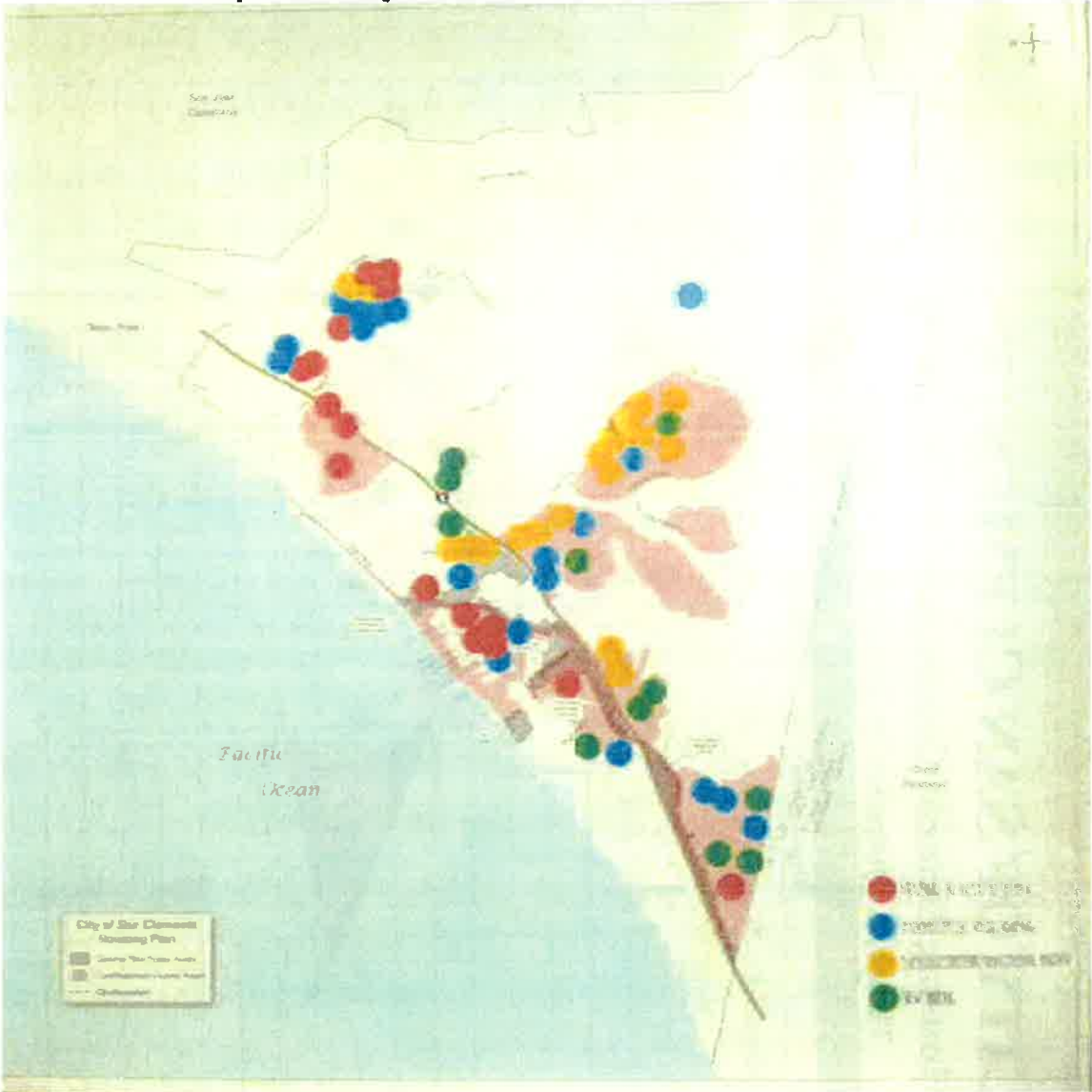
CITY OF SAN CLEMENTE

Housing Element Community Workshop

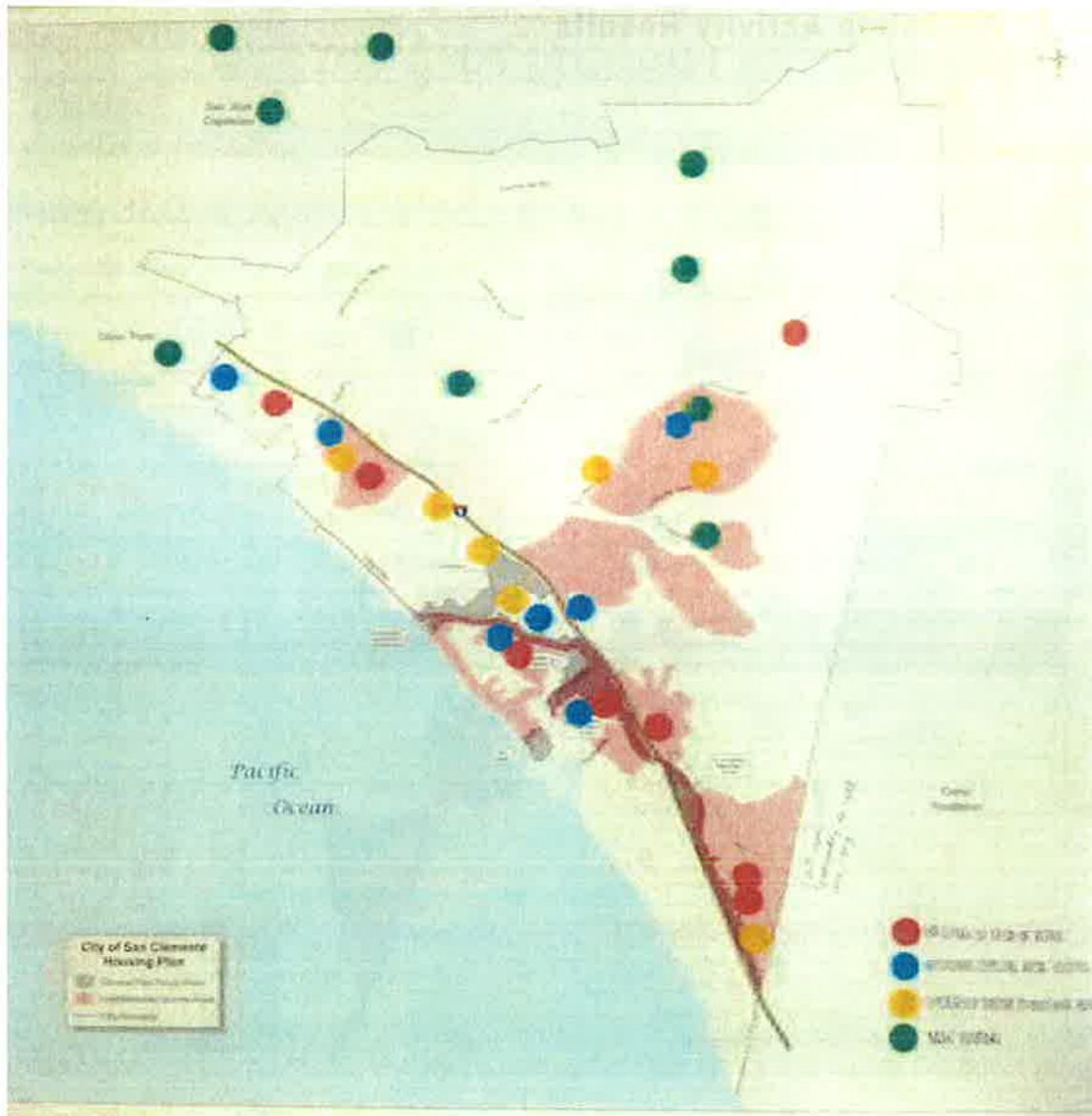
Thursday, September 24, 2015, 6:30 to 8:00 PM

Sign-In Sheet						
1	Print Name	Organization	Address	Email	Telephone No.	
2	Bruce Brown					
3	Sandra Kerner			poetis@poetis.com		
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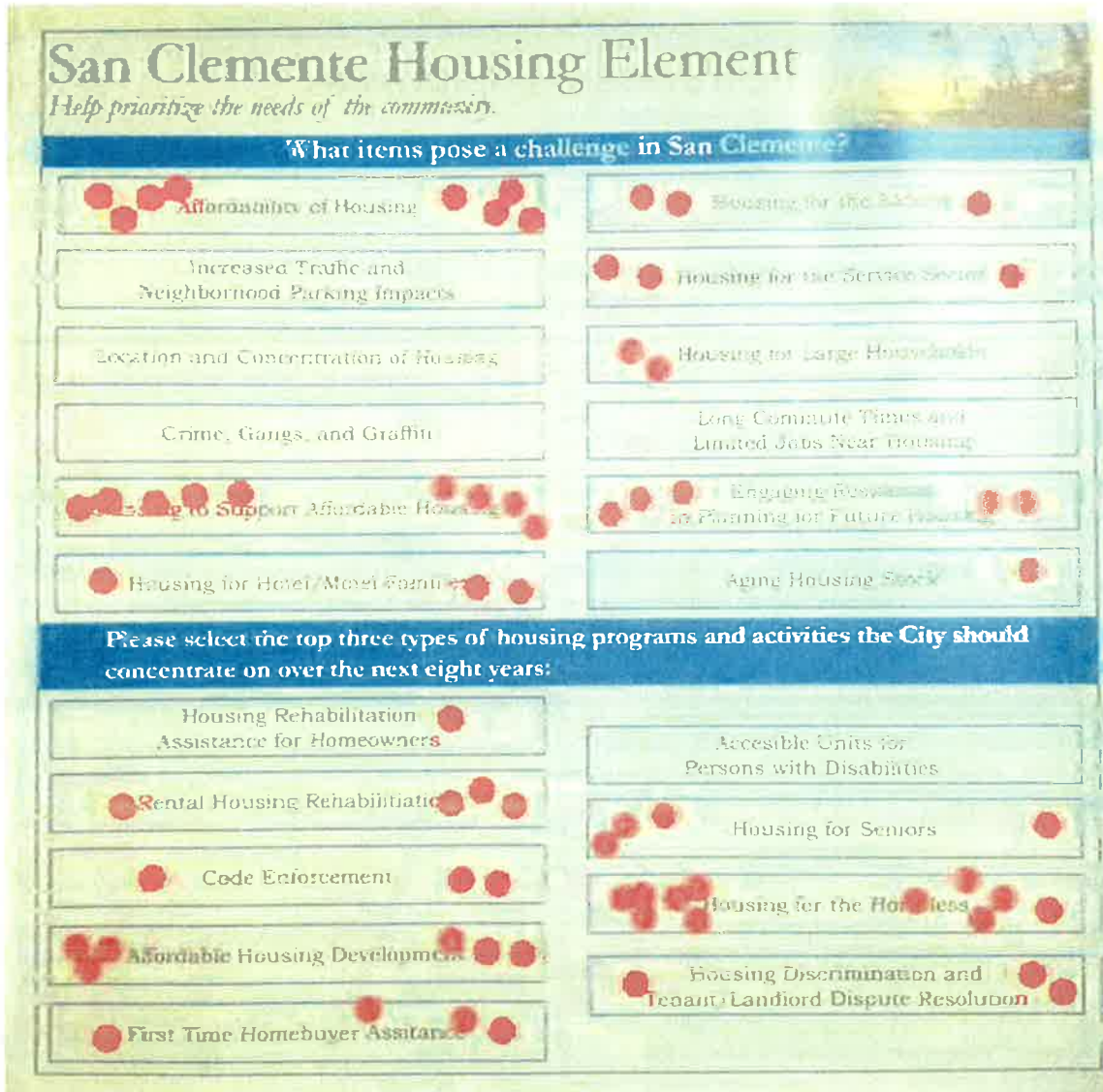
A.4 Workshop Activity Results



- Housing in Need of Repair
- Affordable/Special Needs Housing
- Emergency Shelters/Transitional Housing
- New Housing



- Housing in Need of Repair
- Affordable/Special Needs Housing
- Emergency Shelters/Transitional Housing
- New Housing



San Clemente Housing Element

Help prioritize the needs of the community.

What items pose a challenge in San Clemente?

<p>Affordability of new housing ●●●●●●●●●●</p>	<p>Housing for the Elderly ●</p>
<p>Increased Traffic and Neighborhood Parking Impact ●●●●●●●●</p>	<p>Housing for the Service Sector ●</p>
<p>Location and Concentration of housing ●</p>	<p>Housing for Large Households ●</p>
<p>Crimes, Graffiti, and Graft ●</p>	<p>Long Commute Times and Limited Job/Job Training ●●●●</p>
<p>Funding to Support Affordable Housing ●●●●●●●●●●</p>	<p>Engaging Residents in Planning for Future Housing ●</p>
<p>Housing for Hotel/Motel Families ●</p>	<p>Ageing Housing Stock ●●●●</p>

Please select the top three types of housing programs and activities the City should concentrate on over the next eight years:

<p>Housing Rehabilitation Assistance for Homeowners ●</p>	<p>Accessible Units for Persons with Disabilities ●●●●</p>
<p>Partial Housing Rehabilitation ●●●●●●●●</p>	<p>Housing for Seniors ●●●●●●</p>
<p>Code Enforcement ●●●●●●●●●●</p>	<p>Housing for the Homeless ●●●●●●●●</p>
<p>Affordable Housing Development ●●●●●●●●●●</p>	<p>Housing Discrimination and Tenant/Landlord Dispute Resolution ●●●●●●</p>
<p>First Time Homebuyer Assistance ●</p>	

A.5 Public Comments Received and City Responses

February 2, 2016



www.kennedycommission.org
17701 Canon Ave., Suite 200
Irvine, CA 92614
949.250.0500
Fax 949.268.0847

Mayor Bob Baker and City Council Members
City of San Clemente
26 Avenida Preñido
San Clemente, CA 92672

RE: Comments on Draft 2013-2021 Housing Element Update (February 2016)

Dear Mayor Baker and City Council Members:

Thank you for the opportunity to review and comment on the City of San Clemente's 2013-2021 draft Housing Element. We have reviewed the draft and are submitting this letter to provide public comments.

The Kennedy Commission (the Commission) is a coalition of residents and community organizations that advocates for the production of homes affordable for families earning less than \$20,000 annually in Orange County. Formed in 2001, the Commission has been successful in partnering with Orange County jurisdictions to create effective housing policies that have led to the new construction of homes affordable to lower income working families.

The Commission would like to commend the City for its leadership and commitment in encouraging and facilitating the development of homes affordable to lower income families. The City recently completed two developments, Cotton's Point Senior Apartments (54 extremely low/ very low- and 21 low-income homes) and Las Palmas Apartments (11 extremely low/ very low- and 7 low-income homes).¹ While these developments provide quality homes that are affordable to seniors and families, more affordable homes are needed to address the significant unmet housing needs for lower income working families and special needs residents living in the City.

During the 2008-2014 Housing Element planning period, **ZERO** units were built for the lower income households. As the City moves forward with the draft Housing Element update, the Commission urges the City to continue its support for the development of affordable homes. The Commission has provided the following recommendations for the City to incorporate:

1. Hold a follow-up community workshop to thoroughly address the draft 2013-2021 Housing Element comments and recommendations that were provided by residents, advocates and stakeholders.
2. Re-evaluate the potential sites identified in the Residential Sites Inventory for the development of affordable homes for lower income families. The development capacity

¹ City of San Clemente 2013-2021 Housing Element, p. 64, February 2, 2016

Working for systemic change resulting in the production of homes affordable to Orange County's extremely low-income households

Mayor Baker and City Council Members
 February 2, 2016
 Page 2 of 5

of the identified sites is very low and not realistic/feasible to facilitate the development of affordable homes for lower income families.² Of the 28 identified vacant sites, 26 sites have a total development capacity (including Density Bonus units) of 10 units and less per site. Of the four identified underutilized sites, three sites have a total development capacity (including Density Bonus) of only 20 units, 5 units and 3 units.

With the exception of two sites (101 North La Esperanza at 2.18 acres and Shorecliffs Golf Course at 6 acres), the majority of the identified vacant and underutilized sites are very small averaging from just 0.09 acres to 0.25 acres. Some of these sites are adjacent to each other and have the potential to be consolidated. The draft Housing Element includes Program 2: Lot Consolidation³ to help facilitate consolidation opportunities; however, this Program may not be effective or realistic to facilitate the development of affordable homes for lower income families.

When appropriate individual/adjacent sites are consolidated (refer to attachment), only two consolidated sites yield the highest development capacity of 18 units and 35 units. For example, Map ID 10 through 15 (six individual sites) need to be consolidated to have a total capacity (including Density Bonus) of only 18 units. Map ID 20 through 24 (five individual sites) need to be consolidated to have a total capacity (including Density Bonus) of 35 units. Without strong incentives in place for lot consolidation, an affordable housing developer will face development barriers and constraints to consolidate two sites, let alone four or five individual sites. Consolidation of sites will be very costly, especially if it takes six individual sites to build only 18 units and if the sites are not owned by the same individual/ entity.

3. Provide more information regarding underutilized sites that are identified in the Residential Sites Inventory (Table 55).⁴ The current use of the underutilized sites needs to be disclosed to analyze how adequate, feasible and realistic the sites are to facilitate the development of affordable homes for lower income families.
4. Include city-owned/ surplus land in the residential sites inventory for the development of homes affordable to lower income households. Considering the majority of the identified vacant and underutilized sites are not realistic or feasible, city-owned/ surplus land such as La Pata/ Vista Hermosa and 1030 Calle Negocio⁵ should be identified as opportunity sites for the development of affordable homes for lower income families. These sites should be prioritized for affordable homes to qualified affordable home developers who can effectively leverage the land and available funding to create deeper affordability levels.

² City of San Clemente 2013-2021 Housing Element, p. 67-68, February 2, 2016.

³ City of San Clemente 2013-2021 Housing Element, p. 74, February 2, 2016.

⁴ City of San Clemente 2013-2021 Housing Element, p. 68, February 2, 2016.

⁵ Declaration of Surplus Property, Agenda Report San Clemente City Council Meeting, p. 9-A-1, July 15, 2014

Mayor Baker and City Council Members
 February 2, 2016
 Page 3 of 5

5. Strengthen and improve the effectiveness of Program 4: Affordable Housing Overlay to encourage and facilitate the development of homes affordable to lower income families. In the draft Housing Element, the following was identified:

“The Overlay sites are unlikely to be developed without an incentive program including financial assistance to non-profit organizations to purchase the affordable units or build new housing projects. The requirement to provide on-site affordable units results in less resistance to affordable housing when they are proposed as part of a mixed income development.”⁶

As stated above, creating specific incentives is key to the success of the program. Without development incentives, the program is poised to not be as effective and the City may lose out to potential development opportunities for lower income working households.

6. Discuss in depth how the use of in-lieu fees (currently at \$279,000) would be prioritized for the development of homes affordable to lower income families. In particular, the City should consider utilizing the in-lieu fees to be used exclusively for the development of new rental homes that are affordable to extremely low-, very low- and low-income households. In addition, the City should outreach to potential affordable housing developers to discuss the availability of opportunity sites and how the in-lieu fees can fund the development of homes affordable to lower income households.
7. Identify specific sites where emergency shelters can realistically be built in the City and remove churches as opportunity sites for emergency shelters. The City should also evaluate the feasibility of implementing a fee waiver or reduction program to encourage the development of emergency homeless shelters.
8. Implement a program that will set-aside a percentage of new rental homes that are affordable to persons with developmental disabilities and pursue funding sources designated for persons with special needs and disabilities. Please refer to the California State Department of Housing and Community Development Department’s Sample Programs:⁷
- a. Program Sample 2: Develop a program to provide rental assistance to fill the gap between income levels and the cost of housing for persons with Developmental Disabilities.
 - b. Program Sample 3: Explore models to encourage the creation of housing for persons with developmental disabilities and implement a program by 2015.

⁶ City of San Clemente 2013-2021 Housing Element, p. Appendix D-2, February 2, 2016.

⁷ “Persons with Developmental Disabilities SB R12 (Ashburn), Chapter 507, Statutes of 2010,” Memorandum by the Department of Housing and Community Development, p. 12, June 21, 2012

ATTACHMENT

San Clemente Residential Sites Inventory (p. 67)
February 2016

- Consolidated Information

Vacant Sites Map ID	APN	Property Address	Acres	Potential Units	Density Bonus Units	Total Units	Consolidated Sites Map ID	Consolidated Total Units	GP	Zone	Density	Alt Overlay	From Previous HE
1	692-152-21	1010 S. El Camino Real	0.30	2	2	9	1	4	NC	NC2	24		
2	692-131-05	near 1201 S. El Camino Real	0.42	10	7	10	2	10	NC	NC2	20		
3	592-171-38	1430 S. El Camino Real	0.22	5	3	7	3	14	NC	NC2	24		
4	692-171-19	1430 S. El Camino Real	0.27	5	3	7	3	14	NC	NC2	24		
5	690-422-03	near 2201 S. El Camino Real	0.13	2	1	3	4	5	NC	NC2	24		
6	692-422-04	near 2201 S. El Camino Real	0.10	2	1	3	5	5	NC	NC2	24		
7	692-324-02	1009 N. El Camino Real	0.11	2	1	3	5	5	NC	NC2	24		
8	692-324-02	near 2801 S. El Camino Real	0.27	11	4	17	6	17	MU	MU5.1	36		
9	692-071-25	near 2801 S. El Camino Real	0.27	6	2	8	2	8	NC	NC2	24		
10	692-381-25	1300 block N. El Camino Real	0.09	2	1	3			NC	NC2	24		
11	692-381-25	1300 block N. El Camino Real	0.09	2	1	3			NC	NC2	24		
12	692-381-27	1300 block N. El Camino Real	0.09	2	1	3	9	15	NC	NC2	24		
13	692-381-29	1300 block N. El Camino Real	0.10	2	1	3			NC	NC2	24		
14	692-381-29	1300 block N. El Camino Real	0.10	2	1	3			NC	NC2	24		
15	692-381-30	1300 block N. El Camino Real	0.09	2	1	3	9	15	NC	NC2	24		
16	692-394-06	100 W. El Portal	0.09	2	1	3	10	16	NC	NC2	24		
17	692-394-06	100 W. El Portal	0.09	2	1	3	10	16	NC	NC2	24		
18	690-445-02	1502 S. El Camino Real	0.15	3	3	3	10	13	NC	NC2	24		
19	690-445-03	2400 S. El Camino Real	0.15	3	3	3	11	14	NC	NC1	24		
20	692-121-14	1631 Calle Las Bonas	0.15	5	2	7			RH	RH	18		
21	692-121-15	1520 Calle Las Bonas	0.15	5	2	7			RH	RH	18		
22	692-121-16	1633 Calle Colina	0.12	6	2	6	12	35	RH	RH	36		
23	692-121-17	1601 Calle Colina	0.14	5	3	5	12	35	RH	RH	36		
24	692-121-17	1633 Calle Las Bonas	0.15	5	2	7			RH	RH	18		
25	057-153-26	115 La Ronda	0.17	4	1	5	23	33	RM	RM	27		
26	057-153-26	115 La Ronda	0.15	3	1	4			RM	RM	27		
27	057-153-26	119 La Ronda	0.16	3	1	4			RM	RM	27		
28	690-013-01	101 North La Esperanza	2.18	52	0	52	18	70	RM	RM	24		
TOTAL:			8.53	181	36	197		297					

Likewise, the feasibility of transitional and supportive housing or shelters must be demonstrated in the City's Housing Element. The City Council should NOT approve the draft Housing Element until a feasibility analysis has been authorized for City owned lands. The completed analysis must prove there are adequate sites with suitable financial viability for transitional and supportive housing or homeless shelters. At a minimum the feasible sites should be included in the current 4-year update of the Housing Element with the financial and permitting viability included in the second 4-year update due in 2017.

In addition, to meet the City's required Regional Housing Need Assessment, the Ave. La Pata/Vista Hermosa site should be included in the Housing Inventory since this is the best and most feasible site for affordable housing in the City.

Respectfully yours,
Dennis Ettlin
27222 Paseo Lomita
San Juan Capistrano, CA 92675

Regarding: Item 7B 2/2/16 City Council Meeting

January 25, 2016

Leslie Davis
San Clemente, CA
Lesliedavis5@gmail.com

Dear Mayor Baker and City Council,

I have reviewed the 2016 Draft Housing Element and am submitting my comments for public record. As retired Housing Coordinator of the City of San Clemente for 19 years, I believe the comments and corrections I am submitting will provide for a more accurate and approvable Housing Element. I will be submitting my comments to the State Housing and Community Development Department if corrections aren't made.

1. Needs Assessment

- a. **The rental survey is incorrect (page HE-19).** The average rent by unit size listed as Table 23 in the Housing Element is substantially lower than what is available in 2015-16. My January 2016 review of Craig's list has not found any 1 bedroom apartments for the report's stated average of, \$1,019. The average in Craig's list is closer to \$1,500 for a one bedroom, \$1800 for a 2 bedroom and \$2500 for a 3 bedroom (excluding homes for rent which is closer to \$3500). The large apartment complex I surveyed which is typical of corporate apartment complexes in San Clemente was Pacific Point Apartments. A one bedroom apartment starts at \$1529, two bedroom apartments start at \$1899 and 3 bedroom apartments start at \$2399. Table 23 gives an unrealistic view of average rents in San Clemente and should be updated. I own a property near the Pier Bowl and my rents in 2015 were \$1,600 for a 1 bedroom, \$2,000 for a 2 bedroom and \$2300 for the 3 bedroom.
- b. **Table 36 Homeless Resources is incorrect-** The CSP Youth Shelter in Laguna Beach was closed and moved to Huntington Beach about 8 years ago, this is also repeated inaccurately as Youth Shelter of Laguna Beach. Friendship Shelter owns Henderson House in San Clemente. They have changed the population served. The description needs to be updated. There is no mention of the Alternative Living Site (ALS) emergency shelter operated by Friendship Shelter in Laguna Beach. This is the only emergency shelter in South Orange County serving 55 persons. San Clemente homeless can stay there when there are available beds.

There is no mention of the number of beds in each shelter, nor the gap in the number of homeless in San Clemente and the need for additional beds. An important part of the Needs Assessment is counting the homeless and looking at the inventory and expressing the gap in need. Without a gap analysis the Needs Assessment is incomplete.

Camino Health Services is listed as a resource for low income households. Camino Health just opened a clinic in San Clemente. This address should be included in the table. Laura's House Shelter doesn't need to include their address, but the City name should be included in the table. San Clemente deserves the credit.

- c. **Table 37 inventory of affordable units is incorrect**– The address of the units owned by Mary Erickson Community Housing does not include 135 W. Canada. The table lists them as located at 143 W. Marquita.

2. Housing Constraints

- a. **Residential Sites Inventory** – While it is laudable to encourage affordable housing with incentives to build on vacant lots, Table 54, Residential Site Inventory, has only 5 out of 32 sites which 10 or more units can be built. Last year, market rate duplexes were built on one of the larger sites identified in the 2011 Housing Element Site Inventory - 2700 S. El Camino Real. According to the AH Overlay zone description, 51% of the units were to be built as affordable to households earning up to 50% of median income. Why wasn't affordable housing built on this site? What were the in-lieu fees collected if any? There is no table with the in-lieu fees collected from properties that paid them.

If no affordable housing was built in the AH Overlay zone since it was approved in 2008, there should be a discussion of how the AH Overlay zone has failed and what if anything the City will do to incentivize or require new development to include affordable units for households earning less than 50% of median income.

Of the 5 sites listed in Table 54, only 1 is truly feasible for a non-profit to build affordable housing, the Shorecliffs Golf course site. There should be a discussion of the feasibility of this site and what the City will do to require 51% of the units to be built as affordable instead of allowing in-lieu fees to be collected. The other large site, underutilized site located at No. La Esperanza (listed as 52

units) has multiple utility easements running through it and the site study done in 2008 showed less than 30 units were feasible. This should be corrected.

Several non-profit developer's received letters from the Finance Department regarding "city owned surplus land for sale". The sites are located at Calle Extremo and Fabricante in the Rancho San Clemente Business Park and at the 2 acre site at the Corner of Vista Hermosa and La Pata. The letters stated Affordable Housing was considered for these sites, yet they are not included in the Residential Sites Inventory. Proposals have been sent to the City, but no response or decision has been made by the City staff or City Council. If the City is going to solicit bids for affordable housing for these sites, they **must** be included in the Housing Element in order to legitimately develop them as affordable. Considering the infeasibility of the majority of sites in the Site Inventory, feasible City owned sites allowing over 20 units should be included in the Inventory or not promoted as such to developers.

- b. **Section 4.21 Inclusionary In-lieu fund** – No table was provided in this section detailing the amount of in-lieu fees collected between 2011-2015 (\$279,000). A list of the projects the fees were collected from, and projections of in-lieu fees (up to 2021) to be collected from Sea Summit and other known developments should be included in the Housing Element. Providing the locations of projects paying fees will allow for transparent verification of the City collecting the fees and allow non-profit developer's to identify sources of funds available.
- c. **Emergency Shelters** –While there is plenty of discussion of the Emergency Shelter Overlay, there is no list of sites that can be developed as a shelter. There is no discussion of the feasibility of developing a shelter at any of the City owned sites. Without a feasibility analysis, the City is not meeting its SB2 obligation proving that the city owned sites are feasible. The survey done by the San Clemente Collaborative in 2014 identified only ONE church (Heritage Christian Church) that could feasibly provide a shelter on site, the remainder of the churches had pre-schools or evening meetings and events which would preclude anything but extreme community emergencies. Church sites cannot be counted as a reliable shelter for the homeless.

Thank-you for your consideration of my comments.

Sincerely,

Leslie Davis

EDMOND M. CONNOR
MATTHEW J. FLETCHER
DOUGLAS A. HEDENKAMP
MICHAEL SAPIRA
JOHN P. ROSE
LAUREN A. MCKAY
JAMES M. NAH



CONNOR, FLETCHER & HEDENKAMP LLP
ATTORNEYS AT LAW

February 1, 2016

VIA OVERNIGHT COURIER AND EMAIL

City Council
City of San Clemente
100 Avenida Presidio
San Clemente, CA 92672
CityCouncil@san-clemente.org

Re: *Draft Housing Element Update 2013-2021*

Dear Members of City Council:

On behalf of our client, the Emergency Shelter Coalition ("ESC"), we respectfully submit the following comments regarding the Draft Housing Element Update 2013-2021 (the "Draft Update"). We understand that the Draft Update will be presented to the City Council on February 2, 2016, for a decision on whether to submit the Draft Update to the California Department of Housing and Community Development ("HCD") for its review and comments.

On December 1, 2014, ESC filed a Petition for Writ of Mandate (the "Petition") against the City (the "Action") due to the City's failure to (1) adopt a legally adequate SB 2 Ordinance and (2) timely adopt an updated Housing Element that was SB 2 compliant. Unfortunately, the Draft Update suffers from the same legal deficiencies as the City's SB 2 Ordinance. Those deficiencies are spelled out in ESC's Petition and in ESC's Opening and Reply Briefs filed in support of the Petition (collectively, the "Briefs"). To avoid needless repetition of facts, arguments, and authorities that have already been presented to the City's attorneys of record in the Action, ESC's Petition and Briefs are attached hereto and are incorporated herein by reference.

Suffice it to say at this point that the Draft Update is woefully inadequate because it does not comply with the mandatory requirements of section 65583 of the Government Code to identify "adequate sites" for emergency shelters that (a) have "sufficient capacity" to accommodate the City's needs for such shelters and (b) "facilitate and encourage the development" of emergency shelters. The Draft Update similarly fails to contain a sufficient analysis of local efforts to remove governmental constraints that hinder the City from meeting the housing needs of persons and families requiring emergency shelters.

2211 MICHELSON DRIVE, SUITE 1100 IRVINE, CALIFORNIA 92612
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City Council
February 1, 2016
Page 2

For the City to represent in Draft Update that "45 parcels totaling approximately 75 acres" have been identified as feasible shelter sites as part of the City's Emergency Shelter Overlay is misleading and deceptive because (1) over 95% of those parcels are completely unusable as shelter sites and (2) 100% of the parcels are unavailable for use as shelters without discretionary action on the part of the City Council with the inevitable opposition from the public that would accompany such Council action

In short, the Draft Update does not comply with either the letter or the spirit of Government Code section 65583 or the provisions of SB 2. As such, the Draft Update should be revised to bring it into full compliance with such legal requirements.

Very truly yours,

A handwritten signature in blue ink that reads "Edmond M. Connor".

Edmond M. Connor

Attachments

cc: Mayor Bob Baker, bakerb@san-clemente.org
Mayor Pro Tem Kathleen Ward, wardk@san-clemente.org
Council Member Lori Donchak, donchakl@san-clemente.org
Council Member Tim Brown, brownt@san-clemente.org
Council Member Chris Hamm, HammC@san-clemente.org
City Manager James Makshanoff, citymanager@san-clemente.org
City Attorney Scott Smith, attorney@san-clemente.org
City Clerk Joanne Baade, BaadeJ@san-clemente.org
Cecilia Gallardo-Daly, Community Development Director, Gallardo-DalyC@san-clemente.org
Amber Gregg, Associate Planner, GreggA@san-clemente.org
Denise Obrero, Housing Programs Planner, ObreroD@san-clemente.org

Gregg, Amber

From: Veronica Tam <Veronica.Tam@vtaPlanning.com>
Sent: Tuesday, February 02, 2016 11:48 AM
To: Gregg, Amber
Cc: Obrero, Denise; Jessica Suimanjaya; Mayra Navarro; Pechous, Jim
Subject: RE: Housing Element - Response to Questions

Hi All -

So based on our discussions, I would add this to Section 2.4.2 (B), under Vacancy Rates

While the overall vacancy rate was reported by the 2010 Census at 7.9 percent, the detailed vacancy rate by the Census reported the for-rent vacancy at 5.8 percent and the for-sale vacancy at 1.3 percent. Other units were vacant due to foreclosures, seasonal occupancy, or other reasons. Specifically, according to staff research, an estimated 450 housing units in the City are used as vacation rentals, which are only seasonally occupied. The increased presence of vacation rentals has the potential to exacerbate the tight rental housing market in the community, reducing affordable housing opportunities for the workforce. Nonetheless, the real vacancy rates for the City were within the industry standard of five to six percent for rental housing and two percent for ownership housing.

Also, based on our discussions a week or so ago, I already added Program 16. We only need to modify this program

Program 16: Preserve Affordability of Existing Housing Stock

The City continues to suffer from the loss of affordable housing (both for-sale and rental housing) due to factors such as demand exceeding supply, market conditions, and short-term vacation rentals. As housing prices and rents continue to escalate in the region, affordability of the City existing housing stock is diminishing rapidly. Specifically, the City is committed to managing and containing the presence of STLUs in order to ensure that the long-term rental workforce housing inventory is protected. As a beach city, and therefore the extraordinary target of temporary rental situations, the preservation of affordable workforce rental housing is a priority and requires active management.

Objectives and Timeframe:

- Initiate discussions in 2016 to study options for the retention of affordable housing, especially containing and managing STLUs in the community.

Responsible Agency: San Clemente Community Development Department

Funding Sources: Departmental Budget

Veronica Tam, AICP
Principal

Veronica Tam and Associates, Inc.
107 S. Fair Oaks Avenue, Suite 212

Gregg, Amber

From: Gallardo-Daly, Cecilia
Sent: Tuesday, February 02, 2016 10:15 AM
To: Pechous, Jim; Gregg, Amber; Obrero, Denise
Subject: Fwd: Housing Element - Response to Questions

Jim, Amber & Denise,

Can you prepare draft language for tonight based on Lori's comments below? Let me take a look at it when it's done. We can introduce it as part of the staff report and state the reasons why it's being added.

Thanks,
Cecilia

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: "Donchak, Lori" <DonchakL@san-clemente.org>
Date: 02/02/2016 9:22 AM (GMT-08:00)
To: "Gallardo-Daly, Cecilia" <Gallardo-DalyC@san-clemente.org>
Cc: "Makshanoff, James" <makshanoffj@san-clemente.org>, "Pechous, Jim" <PechousJ@san-clemente.org>, "Gregg, Amber" <GreggA@san-clemente.org>
Subject: Re: Housing Element - Response to Questions

Wow!

Thank you.

What I would like to do this evening is add STLU discussion in the two places you mention. Not sure if it is best for me to just ask tonight, or if there's time for draft language to be prepared by staff today. Essentially, I'm looking for something along these lines:

City committed to managing and containing the presence of STLUs in San Clemente in order to ensure that long term rental workforce housing inventory is protected. As a beach city, and therefore the extraordinary target of temporary rental situations, the preservation of affordable workforce rental housing is a priority and requires active management.

You get the idea.

Thank you for such an excellent response.

Lori

On Feb 2, 2016, at 9:12 AM, Gallardo-Daly, Cecilia <Gallardo-DalyC@san-clemente.org> wrote:

Lori,

Staff has prepared a response to your questions on the Housing Element. The questions are in black and staff responses are in blue. Please let Jim, Amber or me know if you need additional clarification or information.

The issue: How do STLU's subtract from precious long term rental housing in San Clemente?

I'm looking for an apples-to-apples housing stock comparison. On 7B-23, it looks there are 7,280 renter HH in SC. Are the 400+ STLU's nested in that number (i.e. about 5% of rental stock is VRBO)? Stated differently, what % of rental stock is VRBO? Recent anecdote: a 19 year renter (employed in OC) in the Pier Bowl pays \$1,900/month for a 1BR. He's being evicted because building owner can get \$2k/week for his apartment as a VRBO.

No, the estimated 400+ STLU are not included in the 7,280 renter-households number. This number reflects actual long term rental households according the 2000 Census. STLU's are included under the vacancy rate information found on Section 7B-31. For rent units are classified as "vacant" if they are vacant for rent, or due to foreclosures, seasonal occupancy (such as STLU or second homes), or other reasons.

You are correct that STLU's make up approximately 5% of our total rental units. This is based on an estimated 8,597 renter occupied units (per Table 11 found on page 7B-25) plus the number of vacant rental units, 498, totaling approximately 9,095 rental units in San Clemente.

7B-36 refers to "Demolition of Housing Stock" Is this where STLU conversions would be acknowledged if they were part of the housing element? If not there, where?

The most appropriate location to discuss STLU in general would be in Section 2.4, Housing Inventory and Market Conditions, which starts on 7B-28. There, we can add a paragraph on STLU.

Another place to discuss STLU is under our programs. We have touched on STLU in draft Program 16, Preserve Affordability of Existing Housing Stock (page 7B-96), which states "that we continue to loose affordable housing due to factors such as demand exceed supply for housing, market conditions, and short term vacation rentals." And the program's objective is to "initiate discussions in 2016 to study options for the retention of affordable housing."

We could add a more detailed program stating we will do a comprehensive review of STLU and how they impact our community. To do this, we would most likely need to budget for a detailed survey to find the specific information we are looking for. The surveys that we rely on for the Housing Element Update come from the Census and American Community Surveys, but the information collected does not detail if a vacant unit is a second home, STLU, or any of the other potential reasons on why the unit is classified as vacant.

#1 7B-56 refers to an item coming to city council Nov 17, 2015. Probably should be updated (bottom of page).

There were a couple areas that had information that needed to be updated. Staff is aware of this and the information will be updated prior to submitting to the State

#2 7B-49 Public Housing affordable units. Does it help SC to show the dates these various resources have opened? That there have been two projects in the past few years is impressive, given state of economy

We are happy to include the dates the projects opened in the table, and it will serve as a good reference tool in the future. It is definitely impressive that SC has been able to construct two affordable housing projects in recent years, and we discuss that in Section 4.1.2, Progress towards RHNA, where we note the opening of Cotton's Pointe in 2014 and Avenida Serra (Las Palmas) in 2015

#3 7B-63. I don't understand how to read the table. What is a General Plan update fee and what is the percentage a percentage of?

The General Plan Update Fee is a continual fee applied to a variety of City discretionary permits. The fee is collected to fund the general plan update which is usually updated every 10 to 20 years

The "percentage of a percentage" For discretionary permits the fee is a percentage of the total cost of the permit. Less clear is how the fee is applied to Building Plan Check fee, which states the fee is 65% of a Building Permit Fee. So for example if the building permit fee was \$100, then \$65 would be added to that for plan check, for a total of \$165.

I'm surprised to learn that our community still has to pay impact fees to the Tollroad (7B-64). Do you have insight into:

A) how much longer

The TCA's website indicates the debt obligation for the construction bonds will be paid off in 2053, the debt is paid by revenue and impact fees. So from what I can tell they are not going away anytime soon

B) whether this is fair since it's been 14 years since TCA has built new roads?

In regard to fairness, the TCA on their website states the development fees are intended to pay off the bonds which fronted the construction of the toll roads. So even with no new construction over the past 14 years, the impact fees apply

C) if it's realistic for the city to appeal to remove this fee/how would it be done?
Thanks. It's a lot of money.

Way back in 1985 the City Council (through a public hearing process) adopted "Areas of Benefit" and established fees to be imposed on new development. The Municipal Code requires these TCA fees to be paid

A building permit applicant, as a condition of issuance of a building permit, shall pay a fee as hereinafter established, to defray the costs of constructing bridges over waterways, railways, freeways and canyons, or constructing major thoroughfares.

The fee affects ONLY new development.

Bill Cameron's recollection from discussions many years ago is that the City obligated itself to collect the fees when it became a part of the TCA Joint Powers Agreement and that if the City wished to withdraw from the TCA, it would still be obligated to pay the fees for ten years after giving notice. To know for sure, someone would need to read the agreements forming the TCA. Bill also noted that opting out of the joint powers agreement removes as a voting member.

Bill checked the TCA website. For 2015, the TCA collected development impact fees of \$24.9M, of which \$117K was from San Clemente for the Foothill/Eastern Corridor. In Irvine, it was \$19.3M and Lake Forest was \$2.4M. For the San Joaquin Corridor, the total collected was \$3.5M with Clemente's contribution being \$1.259M. Most likely the majority of it was from the Outlets' project, being that it is on the west side of I-5.

Thanks
Cecilia

Table C-1: Summary of Public Comments and City Responses

Comment	Response
<i>Letter from Kennedy Commission (dated February 2, 2016) to Mayor Bob Barker and City Council</i>	
1. Consider holding a follow-up workshop to address comments and recommendations to the Draft 2013-2021 Housing Element	The City will be conducting additional public hearings before adoption of the Housing Element.
2. The development capacities estimated for sites identified in the sites inventory are very low and not realistic for the development of affordable housing. Consider re-evaluating their potential for affordable housing.	The majority of sites included in the Housing Element are the same sites that were included in the previous Housing Element and found acceptable to the State. However, the City recognizes the need to encourage lot consolidation. This Housing Element includes a new program to facilitate consolidation of small lots. The City will monitor lot consolidation activities and modify incentives if appropriate.
3. Some of the small sites in the Sites Inventory are adjacent and have the potential to be consolidated. However, the proposed Lot Consolidation Program (Program #2) may not be effective or realistic for actually facilitating the development of affordable housing. For example, five or more sites would need to be consolidated to achieve a single project totaling more than 15 housing units.	
4. Add more detailed information on underutilized sites. It is not possible to determine feasibility for affordable housing development with the information currently provided.	The majority of the sites included in the inventory are vacant sites. Only four sites are considered underutilized. The most significant underutilized site is the Shorecliffs Golf Course.
5. Consider adding city-owned/surplus land to the residential sites inventory. Because the majority of sites identified in the Sites Inventory are unfeasible, these city-owned sites should be prioritized for affordable homes.	Under State law, the City is required to make the City-owned sites available to a variety of agencies and for-profit and non-profit developers via a Request for Proposal process. Depending on the outcome of each RFP, the uses of individual sites cannot be determined at this time.
6. Modify Program 4: Affordable Housing Overlay to include specific incentives. Without specific incentives, the program may lose effectiveness.	The Affordable Housing Overlay program includes a process to review the requirements and make adjustments as necessary as an incentive.
7. Add a detailed discussion on how in-lieu fees will be prioritized for the development of affordable housing. Also consider utilizing in-lieu fees exclusively for the development of lower-income rental housing and seeking input from developers on the best way in-lieu funds can be used for affordable housing development.	The City uses the in-lieu fee primarily to facilitate the acquisition or development of lower income rental housing development. The City allocates the funding based on opportunities that are presented to the City.
8. Identify specific sites within the City where emergency shelters can realistically be developed and remove churches as opportunity sites for shelters.	There are 45 parcels totaling approximately 75 acres of eligible properties within the ES Overlay which could accommodate emergency shelters by right. Additionally, Emergency shelters, up to 10 beds, are allowed by right as an accessory use to churches and religious institutions throughout the City. Many emergency shelters throughout the State are sponsored by religion organizations. A church or religious institution can convert existing surplus space or expand the building on site to accommodate an emergency shelter.
9. Evaluate the feasibility of implementing a fee waiver or reduction program to encourage the development of emergency shelters.	The feasibility of developing a permanent year-round emergency shelter depends largely on the availability of a long-term and sustainable funding stream. There is a process in the Zoning Ordinance where an applicant can request a fee reduction or waiver.

Table C-1: Summary of Public Comments and City Responses

Comment	Response
10. Add a program that will set-aside a percentage of new affordable rental homes for persons with developmental disabilities and pursue funding sources designated for persons with special needs and disabilities.	The City partners with nonprofit developers to provide affordable housing in the City. The City will continue to work with and encourage developers to pursue funding to provide affordable housing for persons with special needs, including persons with disabilities.
11. Consider committing SERAF and boomerang funds for the development of extremely low-income affordable rental housing. Also consider prioritizing and committing potential funding sources (e.g. LIHTC, etc.).	The City does not anticipate any SERAF or boomerang funds.
12. Modify Program 6: Affordable Housing Development to include fee waivers for proposed developments with a minimum of 10 percent very low-income homes.	No affordable housing projects have been granted waivers, and the last two affordable housing projects in the City paid fees as it helped them in financing the project. There is a process in the Zoning Ordinance where an applicant can request a fee reduction or waiver.
13. Consider promoting affordable homes and supportive services for veterans.	The City partners with nonprofit developers to provide affordable housing in the City. The City will continue to work with and encourage developers to pursue funding to provide affordable housing for persons with special needs, including veterans.
<i>Email from resident (dated February 2, 2016) to City Council</i>	
1. Relying on churches to serve the City's homeless is unrealistic. Consider creating a liaison position whose job is to work with local churches to expedite the operation of at least 50 church-sponsored temporary beds for the homeless by December 1, 2016. The liaison will also ensure that churches spend no more than \$30 per night per bed for the homeless. If this is not feasible, then consider amending the next Housing Element to demonstrate feasible compliance with SB 2.	<p>SB 2 does not mandate the construction or establishment of an emergency shelter by the City.</p> <p>SB 2 requires only that the City provide a zone or zones where emergency shelters are permitted by right. The zone(s) must have the capacity to accommodate at least one shelter.</p> <p>However, SB 2 requirements concern permanent, year-round shelters, not temporary beds. In addition to properties in the Emergency Shelters Overlay, the intent of the City's Zoning Ordinance is to allow churches or religious institutions to convert/expand existing building space or to construct new structures on site that can be operated as an emergency shelter.</p>
2. Complete a feasibility analysis for city-owned lands. The analysis should prove there are adequate sites with suitable financial viability for transitional and supportive housing or emergency shelters. These sites should be included in the Draft 2013 Housing Element and the financial and permitting viability of these sites should be discussed in the 2017 Housing Element.	SB 2 requirements for emergency shelters are separate and different from transitional and supportive housing. Under SB 2, transitional housing and supportive housing are considered a residential use to be permitted as similar uses in the same zones. Program 13: Zoning Ordinance Monitoring includes an action to amend the City's Zoning Ordinance by 2016. SB 2 does not require that City to identify sites for transitional and supportive housing. Furthermore, SB 2 does not require the City to evaluate the financial viability of providing emergency shelters, transitional housing, or supportive housing.
3. Consider including the site located on La Pata and Vista Hermosa to the Sites Inventory.	The City is required by State law to make available its surplus properties to a variety of agencies. The City has not yet decided on the development proposals submitted for these sites.

Table C-1: Summary of Public Comments and City Responses

Comment	Response
<i>Letter from resident (dated January 25, 2016) to City Council</i>	
1. The rental survey on page HE-19 is incorrect.	The rental survey has been corrected to reflect the City's market-rate rents.
2. Table 36 summarizing homeless resources in the City is incorrect.	Table 36 has been corrected.
3. Table 36 should include the number of beds in each shelter, the number of homeless in the City, and the number of additional beds necessary to meet this need.	Number of beds is not available for all shelters (specifically Gilchrist House and Laura's House). Furthermore, these shelters are not limited to San Clemente residents making it difficult to calculate the gap in emergency shelter needs.
4. Table 37 lists an incorrect address for Mary Erickson Community Housing.	Table 37 has been corrected.
5. In 2015, a duplex was built on a larger site within the City's Affordable Housing Overlay. Consider adding a table that identifies how much in-lieu fees were collected and from which property.	The Housing Element is a policy document and is not intended to maintain a detailed accounting of fees collected.
6. Identify how much affordable housing has actually been developed in the Affordable Housing Overlay since its approval in 2008. If none, add a discussion of how the Overlay can be made more effective in actually producing affordable units.	There have been two affordable housing projects approved and constructed in the Overlay zone. One project is located in the Downtown on Avenida Serra (Serra Workforce Housing), the other on South El Camino Real (Cotton's Point Senior Housing).
7. Add a more detailed feasibility analysis of the Shorecliffs Golf Course site and include actions that could be taken by the City to ensure that affordable housing units are developed as part of this project instead of allowing an in-lieu fee to be collected.	The City's Inclusionary Housing Program offers an in-lieu fee option primarily for small and mid-size projects that have difficulty in providing on-site affordable units. Large-scale development would be subject to the on-site affordable housing requirement.
8. The estimated capacity of the La Esperanza site (Table 54) should be updated to accurately reflect existing constraints. Multiple utility easements run through the site and a feasibility study completed in 2008 estimated that fewer than 30 units were feasible on the site.	The City owns approximately 40 percent of the utility easements on site. If a project were to be proposed at the site, there is flexibility with the easements. The last certified Housing Element noted 24 units/acre may be feasible for the site. Potentially yielding between 30 and 52 units on the site. For the purpose of this Housing Element, the lower end of the range is used.
9. City-owned surplus land should be included in the Sites Inventory, particularly since the City has actively solicited proposals for affordable housing development on these sites.	Under State law, the City is required to make available surplus sites to a variety of agencies, not just affordable housing. Uses of these sites cannot be determined at this time.
10. Add a table to Section 4.21 detailing the amount of in-lieu fees collected between 2013 and 2015. Also include the projects the fees were collected from as well as projections up to 2021.	The Housing Element is a policy document and is not intended to maintain a detailed accounting of in-lieu fees collected.
11. Include a list of sites within the Emergency Shelter Overlay that are feasible for the development into shelters. A feasibility analysis should be conducted in order to ensure that the City meets its SB 2 obligations.	A map illustrating the Emergency Shelter Overlay is located on the City's website. SB 2 does not mandate the establishment or construction of an emergency shelter.
<i>Letter from resident (dated February 1, 2016) to City Council</i>	
1. Draft Housing Element fails to identify adequate sites as required by SB 2. It also fails to contain a sufficient analysis of local efforts to remove governmental constraints to development of emergency shelters.	SB 2 only mandates local jurisdictions to identify a zone where emergency shelters are permitted by right. In November 2015, the City amended the Zoning Ordinance to remove the floor area requirement and certain standards for entries and outdoor use

Table C-1: Summary of Public Comments and City Responses

Comment	Response
	areas that may constrain the development of emergency shelters.
2. The estimated capacity of the City's Emergency Shelter Overlay is misleading because the majority of parcels in the Overlay are actually unusable as emergency shelter sites.	The City has an estimated homeless population of 65 persons. SB 2 only requires that the City provide a zone that can accommodate at least one shelter for its unsheltered population. The City's Emergency Shelter Overlay has ample capacity relative to its homeless population.
<i>Email from City Councilmember to City Staff (dated February 2, 2016) to City Council</i>	
1. Add analysis on how Short Term Lodging Units (STLU) affects the City's long term rental housing market.	Program 16: Preserve affordability of Existing Housing Stock has been added to the Housing Element. This program calls for initiating discussions to study options for retaining rental housing and managing vacation rentals in the community.
2. Modify Table 37 to include Dates Placed in Service for the City's affordable housing projects.	Table 37 was amended to include this information.

Attachment D: Household Size Distribution (2010)

Household Size	Total Households ¹	% of Total	Renter- Households	% of Total ²	Owner- Households	% of Total ²
1 Person	5,184	21.70%	2,567	10.70%	2,617	10.90%
2 Persons	8,580	35.90%	2,639	11.00%	5,941	24.90%
3-4 Persons	7,674	32.10%	2,412	10.10%	5,262	22.00%
5+ Persons	2,468	10.30%	979	4.10%	1,489	6.20%
Total	23,906	100.00%	8,597	36.00%	15,309	64.00%

Notes:

1. Represents Total Households
2. Percent of Total Households

Source: City of San Clemente 2013-2021 Housing Element

Attachment E: Overcrowding by Tenure (2013)

Jurisdiction	Overcrowded (1.01-1.5 occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
San Clemente	3.80%	0.80%	1.80%	4.50%	0.10%	1.60%
Orange County	9.90%	2.90%	5.80%	6.90%	1.10%	3.50%

Source: City of San Clemente 2013-2021 Housing Element

Attachment F: Housing Assistance Needs of Lower Income Households

Household by Type, Income & Housing Problem	Renters				Owners				Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
Ext. Low Income (0-30% AMI)	320	595	135	1,395	585	265	90	1,160	2,555
with any housing problems	84.40%	87.40%	100.00%	88.50%	77.80%	100.00%	100.00%	83.20%	86.10%
with cost burden > 30%	84.40%	73.10%	103.70%	82.80%	76.90%	94.30%	100.00%	81.50%	82.20%
with cost burden > 50%	81.30%	71.40%	85.20%	78.50%	66.70%	83.00%	100.00%	73.70%	76.30%
Very Low Income (31-50% AMI)	230	640	145	1,465	705	340	20	1,140	2,605
with any housing problems	93.50%	96.10%	93.10%	94.90%	50.40%	92.60%	100.00%	67.10%	82.70%
with cost burden > 30%	93.50%	93.80%	93.10%	93.90%	48.90%	91.20%	100.00%	65.80%	81.60%
with cost burden > 50%	69.60%	68.00%	44.80%	70.60%	29.10%	82.40%	100.00%	49.10%	61.20%
Low Income (51-80% AMI)	250	725	230	1,955	780	645	130	1,875	3,830
with any housing problems	78.00%	67.60%	97.80%	70.60%	50.00%	93.80%	100.00%	73.60%	72.10%
with cost burden > 30%	78.00%	57.90%	47.80%	59.30%	50.00%	94.60%	92.30%	73.30%	66.20%
with cost burden > 50%	32.00%	14.50%	13.00%	13.30%	27.60%	83.70%	46.20%	56.00%	34.20%
Moderate/Above Moderate Income (81% + AMI)	310	1,785	240	3,560	3,160	5,965	1,050	11,510	15,070
with any housing problems	27.40%	21.30%	29.20%	19.10%	31.00%	32.40%	36.20%	34.10%	30.50%
with cost burden > 30%	22.60%	19.30%	10.40%	15.70%	31.00%	32.30%	36.70%	34.00%	29.70%
with cost burden > 50%	0.00%	0.80%	0.00%	0.50%	11.70%	5.50%	4.80%	8.40%	6.50%
Total Households	1,110	3,745	750	8,375	5,230	7,215	1,290	15,685	24,060
with any housing problems	68.90%	53.50%	75.30%	55.90%	41.70%	43.20%	48.10%	44.80%	48.70%
with cost burden > 30%	67.60%	48.10%	54.70%	50.70%	41.40%	42.90%	47.70%	44.50%	46.70%
with cost burden > 50%	45.00%	26.20%	28.00%	28.80%	22.60%	19.00%	17.10%	21.90%	24.30%

Source: City of San Clemente 2013-2021 Housing Element

Note: HUD CHAS (Comprehensive Housing Affordability Strategy) data is based on tabulations from the ACS and has a smaller sample size than the Decennial Census. Due to the smaller sample size, the data presented may have significant margins of error, particularly for smaller geographies. The intent of the data is to show general proportions of household need, not exact numbers.

Attachment G: Racial and Ethnic Composition (2000-2010)

Ethnic Group	2000				2010			
	San Clemente		Orange County		San Clemente		Orange County	
Non-Hispanic White	39,155	78.40%	1,458,978	51.30%	48,254	76.00%	1,328,499	44.10%
Black/African American	320	0.60%	42,639	1.50%	349	0.50%	44,000	1.50%
Hispanic or Latino	7,933	15.90%	875,579	30.80%	10,702	16.80%	1,012,973	33.70%
Am. Ind./Alaska Native	167	0.30%	8,414	0.30%	193	0.30%	6,216	0.20%
Asian/Pacific Islander	1,355	2.70%	391,896	13.80%	2,347	3.70%	540,834	18.00%
Other	58	0.10%	4,525	0.20%	89	0.10%	5,593	0.20%
Two or more races	948	1.90%	64,258	2.30%	1,588	2.50%	72,117	2.40%
Total Population	49,936	100.00%	2,846,289	100.00%	63,522	100.00%	3,010,232	100.00%

Source: City of San Clemente 2013-2021 Housing Element

Disproportionately Greater Need

Per HUD, a “disproportionately greater need” exists when the members of a racial or ethnic group at a given income level experience housing problems at a rate at least 10% points greater than the that same racial or ethnic group as a whole.

Example: Hispanics/Latinos comprise 16.8% of San Clemente’s total population; therefore, the “disproportionality” need threshold for any Hispanic/Latino income group or cohort is 26.8%. If the cohort of Hispanics/Latinos with extremely low-income totaled 32.3%, it would be considered to have a “disproportionately greater” housing need as it exceeds the disproportionate threshold by 5.5%.

Race/Ethnic Population Experiencing 1 or More Housing Problem

Race/Ethnic Population (of San Clemente)	Percent of Racial/Ethnic Group with 1 or More Housing Problem	Percent of Race/Ethnic Population +/- Disproportionate Threshold
NON-HISPANIC WHITE - 76.0% OF POPULATION		DISPROPORTIONATE THRESHOLD = 86.0%
Extremely Low-Income (0%-30%)	71.1%	-14.9%
Very Low-Income (30%-50%)	76.7%	-9.3%
Low-Income (50% - 80%)	80.1%	-5.9%
Moderate-Income (80% -100%)	82.2%	-3.8%
HISPANIC/LATINO - 16.8% OF POPULATION		DISPROPORTIONATE THRESHOLD = 26.8%
Extremely Low-Income (0%-30%)	17.0%	-9.8%
Very Low-Income (30%-50%)	20.5%	-6.3%
Low-Income (50% - 80%)	14.8%	-12.0%
Moderate-Income (80% -100%)	12.2%	-14.6%
ASIAN/PACIFIC ISLANDER - 3.7% OF POPULATION		DISPROPORTIONATE THRESHOLD = 13.7%
Extremely Low-Income (0%-30%)	7.5%	-6.2%
Very Low-Income (30%-50%)	1.2%	-12.5%
Low-Income (50% - 80%)	3.9%	-9.8%
Moderate-Income (80% -100%)	1.7%	-12.0%
BLACK/AFRICAN AMERICAN - 0.5% OF POPULATION		DISPROPORTIONATE THRESHOLD = 10.5%
Extremely Low-Income (0%-30%)	0.7%	-9.8%
Very Low-Income (30%-50%)	0.0%	-10.5%
Low-Income (50% - 80%)	0.0%	-10.5%
Moderate-Income (80% -100%)	1.0%	-9.5%

Source: HUD Consolidated Plan Template for City of San Clemente

Race/Ethnic Population Experiencing 1 or more Severe Housing Problem

Race/Ethnic Population (of San Clemente)	Percent of Racial/Ethnic Group with 1 or More Severe Housing Problem	Percent of Race/Ethnic Population +/- Disproportionate Threshold
NON-HISPANIC WHITE - 76.0% OF POPULATION		DISPROPORTIONATE THRESHOLD = 86.0%
Extremely Low-Income (0%-30%)	70.8%	-15.2%
Very Low-Income (30%-50%)	77.6%	-8.4%
Low-Income (50% - 80%)	73.4%	-12.6%
Moderate-Income (80% -100%)	72.1%	-13.9%
HISPANIC/LATINO - 16.8% OF POPULATION		DISPROPORTIONATE THRESHOLD = 26.8%
Extremely Low-Income (0%-30%)	17.6%	-9.2%
Very Low-Income (30%-50%)	20.0%	-6.8%
Low-Income (50% - 80%)	19.8%	-7.0%
Moderate-Income (80% -100%)	19.2%	-7.6%
ASIAN/PACIFIC ISLANDER - 3.7% OF POPULATION		DISPROPORTIONATE THRESHOLD = 13.7%
Extremely Low-Income (0%-30%)	7.7%	-6.0%
Very Low-Income (30%-50%)	1.5%	-12.2%
Low-Income (50% - 80%)	5.2%	-8.5%
Moderate-Income (80% -100%)	4.8%	-8.9%
BLACK/AFRICAN AMERICAN - 0.5% OF POPULATION		DISPROPORTIONATE THRESHOLD = 10.5%
Extremely Low-Income (0%-30%)	0.7%	-9.8%
Very Low-Income (30%-50%)	0.0%	-10.5%
Low-Income (50% - 80%)	0.0%	-10.5%
Moderate-Income (80% -100%)	2.9%	-7.6%

Source: HUD Consolidated Plan Template for City of San Clemente

Race/Ethnic Population Experiencing - Greater Housing Cost Burden Need (Only)

Race/Ethnic Population (of San Clemente)	Percent of Racial/Ethnic Group with Housing Cost Burden	Percent of Race/Ethnic Population +/- Disproportionate Threshold
NON-HISPANIC WHITE - 76.0% OF POPULATION		DISPROPORTIONATE THRESHOLD = 86.0%
Extremely Low-Income (0%-30%)	83.9%	-2.1%
Very Low-Income (30%-50%)	84.6%	-1.4%
Greater than 50%	80.3%	-5.7%
HISPANIC/LATINO - 16.8% OF POPULATION		DISPROPORTIONATE THRESHOLD = 26.8%
Extremely Low-Income (0%-30%)	10.2%	-16.6%
Very Low-Income (30%-50%)	9.9%	-16.9%
Greater than 50%	13.7%	-13.1%
ASIAN/PACIFIC ISLANDER - 3.7% OF POPULATION		DISPROPORTIONATE THRESHOLD = 13.7%
Extremely Low-Income (0%-30%)	4.4%	-9.3%
Very Low-Income (30%-50%)	3.0%	-10.7%
Greater than 50%	3.2%	-10.5%
BLACK/AFRICAN AMERICAN - 0.5% OF POPULATION		DISPROPORTIONATE THRESHOLD = 10.5%
Extremely Low-Income (0%-30%)	0.3%	-10.2%
Very Low-Income (30%-50%)	0.3%	-10.2%
Greater than 50%	0.3%	-10.2%

Source: HUD Consolidated Plan Template for City of San Clemente

Attachment I : Household Size Distribution (2010)

Property Name	Property Address	Funding Source	Unit Size	Total Affordable Units	Total Project Units	Date of Opening	Expiration of Affordability
Escalones Nuevos	150-152 W. Escalones	HOME, City RDA	6 – 2 br	6	6	2002	2025
	143 West Marquita		4 – 2 br				
	135 W. Canada		4 – 3 br				
Mary Erickson Community Housing The Presidio (Casa de Seniors)		HOME	1 – 4 br	12	12	2004	2032
	105 Avenida Presidio	Sec 8/ Sec 202	72 – 1 br	72	72	1986	2034
Mary Erickson Community Housing	1042 Calle Del Cerro #201 1050						
	Calle Del Cerro #604 1052 Calle	HOME,					
	Del Cerro #712 1064 Calle Del	City RDA	4 – 2 br	4	4	2004	2066
Cotton's Point Senior Apartments		MHSA,	61 – 1 br				
	2358 South El Camino Real	City RDA	15 – 2 br	76	76	2014	2069
Las Palmas Apartments		LIHTC,					
	115 Avenida Serra	HCD IIG	19 – 1 br	18	19	2015	2070
Vintage Shores Apartments			80 – 1 br				
	366 Camino De Estrella	LIHTC	42 – 2 br	120	122	2002	2057
Mendocino at Talega Jamboree Apartments Phase I			60 – 1 br				
	123 Calle Amistad	LIHTC	64 – 2 br	123	124	2003	2058
Mendocino at Talega Jamboree Apartments Phase II			31 – 2 br				
	123 Calle Amistad	LIHTC	31 – 3 br	61	62	2003	2058
Total				492	497		

Abbreviations: HOME: HOME Investment Partnerships Program (HUD); CDBG: Community Development Block Grant (HUD); RDA: City Redevelopment Agency; LIHTC:

Low Income Housing Tax Credit; HTF: Housing Trust Fund; MHSA: Mental Health Services Act

Source: City of San Clemente 2013-2021 Housing Element

Homeless Housing Glossary
(excerpt from 2015 OC-CoC Point In Time Survey)

*** Emergency Shelter**

In the CoC Supportive Housing Program, emergency shelters are facilities offering limited shelter stays (generally up to 90 days) which offers a safe alternative to living on the streets and which provides essential services. On a case-by-case basis, clients may remain for longer than ninety days if they require a longer period to accomplish a specific goal.

*** Transitional Housing**

A project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months, or a longer period approved by HUD.

*** Permanent Supportive Housing**

Long-term, community-based housing that has supportive services for homeless persons with disabilities. This type of housing enables the special needs populations to live independently as possible. Permanent housing can be provided in one structure or in several structures at one site or in multiple structures at scattered sites.

* Definitions from Appendix F of the Orange County Homeless Count & Survey Report, July 2015

8. Fair Housing Plan

The Orange County 16 City Analysis to Fair Housing Choice (AI) evaluates a wide range of private and public sector housing issues and potential barriers to fair housing. This chapter builds upon the previous analysis, summarizes conclusions and presents a list of recommendations to help address the impediments. **The Fair Housing Action Plan (Table 8-1) is provided at the end of this Chapter: only those actions pertinent to a specific jurisdiction are included in each city's individual Fair Housing Action Plan.** Periodically, during the Consolidated Plan Annual Action Plan and Consolidated Annual Performance Evaluation Report (CAPER) processes, individual jurisdictions may adjust their Fair Housing Action Plan depending on funding availability and progress and effectiveness in implementing the actions.

A. Regional, Private Sector Impediments Carried Over from 2010 Regional and Subregional AI

1. Housing Discrimination

Impediment A-1: Housing discrimination continues to exist throughout Orange County, as evidenced by the number of complaints and fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County. An average of 85 cases were opened in the participating cities over the past three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race.

Recommendations for All Jurisdictions:

- In partnership with each city's fair housing provider, conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths at community events, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature.
- Conduct focused outreach and education to small property owners/landlords on fair housing, and race, reasonable accommodation and familial status issues in particular. Conduct property manager trainings on a regular basis, targeting managers of smaller properties, and promote fair housing certificate training offered through the fair housing providers.
- Provide general counseling and referrals to address tenant-landlord issues through each city's fair housing contractor, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.

- Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation as a means to deter discriminatory practices and to encourage reporting.

2. Racial and Ethnic Segregation

Impediment A-2: Residential segregation refers to the degree in which groups live separately from one another. Within the County there are areas of racial/ethnic concentrations, such as in Santa Ana where over three-quarters of the population is Hispanic and ten percent Asian. Approximately ten percent of households in the County are considered to be limited English-speaking households.

Recommendations for All Jurisdictions:

- Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in identified areas of racial/ethnic concentrations.
- Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate the provision of affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools.
- Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.
- Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.

3. Denial of Reasonable Modifications/ Reasonable Accommodations

Impediment A-3: Denial of reasonable modification or reasonable accommodation is a continuing impediment to fair housing choice, and represents over one-half of alleged discriminatory acts in the 16 participating jurisdictions.

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.
- Provide information on the unlawful practice of denying reasonable modifications/accommodations at fair housing seminars conducted by the Apartment Association of Orange County.

4. Discriminatory Advertising

Impediment A-4: Regionally, there were incidents of discriminatory advertising that have the potential to discourage a certain type of renter or buyer from pursuing a housing opportunity. Ads indicating a preference for a certain type of tenant or buyer, such as “no pets”, “no children”, or “Ideal for single adult” have the effect of housing discrimination.

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.
- Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.

5. Hate Crimes

Impediment A-5: Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of an average of 35 households per year in the 16 participating Orange County cities. Of the total 169 hate crime incidents reported between 2010 and 2014, 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, 2 to disability and 2 to gender identity. Nearly 60 percent of these incidents occurred within the following four jurisdictions: Huntington Beach (36 incidents), Santa Ana (31 incidents), Newport Beach (18 incidents), and Garden Grove (15 incidents).

Recommendations for All Jurisdictions:

- Continue to monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.
- Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes – inclusive of housing resources.

6. Unfair Lending

Impediment A-6: Disparities in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 Orange County cities creates an impediment to fair housing choice as they have loans denied at rates 1.5 to 1.6 times greater than White applicants. In addition, Hispanic residents, which comprise 34 percent of Orange County's population, account for just 10 percent of applications for home purchase loans. Examples of the disparity between Hispanic residents and Hispanic applicants for home purchase loans include: Anaheim has a 53 percent

Hispanic population, with 20 percent of purchase loan applicants comprised of Hispanics; La Habra has a 60 percent Hispanic population, with 23 percent Hispanic mortgage loan applicants; and Santa Ana has a 79 percent Hispanic population, with just 30 percent of home purchase loan applications made by Hispanics. In addition, the proportion of Hispanics to the total pool of mortgage loan applicants in the 16 Orange County cities has decreased in each of the past five years, from 16 percent in 2008 to 10 percent in 2013.

Recommendations for All Jurisdictions:

- As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark.
- As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations.
- Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. In addition, each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.
- Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.
- Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.

B. Public Sector Impediments

1. Housing Element Compliance

Impediment B-1: According to HCD, of the 16 participating jurisdictions, 15 Housing Elements were in compliance, and San Clemente had submitted a draft Housing Element for the current 2014-2021 period in early 2016.

Recommendations for Specific Jurisdictions:

- San Clemente should pursue State certification of its Housing Element.

2. Housing for Persons with Disabilities

Impediment B-2: Disability is the greatest cited basis for discrimination, comprising over half of the fair housing cases opened by the Orange County Fair Housing Council and Fair Housing Foundation in the 16 cities over the past three years. With the exception of the City of San Clemente, all participating jurisdictions have adopted formal policies and procedures in the Municipal Code to reasonably accommodate the housing needs of disabled residents. However, three cities charge a fee (Anaheim, Tustin and La Habra), and one city requires a public hearing (Newport Beach). Imposing a fee or a requirement for a public hearing could serve as an impediment to persons with disabilities seeking reasonable accommodation.

Recommendations for Specific Jurisdictions:

- The City of San Clemente should adopt formal Reasonable Accommodations policy and procedure in 2016.
- The cities of Anaheim, Tustin and La Habra should consider eliminating the processing fee for reasonable accommodation requests.
- The City of Newport Beach should consider amending its Reasonable Accommodation procedures to eliminate the requirement for a public hearing, and to approve administratively.

3. Zoning Regulations

Impediment B-3: The analyses of the land use controls and zoning codes identified the following potential issues:

- **Second Units:** The City of Newport Beach does not currently provide for second units in its Zoning Code for single-family zoned properties, but does allow for "granny units" (accessory, age-restricted units) subject to Zoning Administrator approval of a Minor Use Permit. The City's age restrictions, combined with the requirement for non-ministerial approval, may serve to impede housing choice.
- **Single-Room Occupancy Housing:** The majority of the 16 participating cities either contain specific provisions for SROs in their Zoning Ordinances, or have clarified in their Housing Elements how SROs are provided for under other zoning classifications. The cities of Buena Park, Orange and Santa Ana, however, do not currently specify zoning for SROs, or otherwise clarify how such uses would be provided for, though Buena Park has indicated SROs could currently be accommodated through a development agreement. Buena Park and Orange both include programs in their 2014-2021 Housing Elements to amend the Zoning Code to specifically address the provision of SRO units. Lack of clarity on provision for SROs can serve to limit housing choice to extremely low income households, including persons with disabilities and veterans.
- **Transitional/Supportive Housing:** In all participating jurisdictions, with the exception of the cities of Fountain Valley and Orange, transitional and supportive housing is permitted in the

manner prescribed by State law, regulated as a residential use and subject to the same permitting and standards as similar residential uses of the same type in the same zone. The City of Orange Zoning Code currently only addresses transitional and supportive housing structured in the form of group housing, and the City of Fountain Valley Zoning Code contains a definition of supportive housing but doesn't specify how such uses are to be regulated.

Recommendations for Specific Jurisdictions:

- The City of Newport Beach should consider pursuing a Zoning Code amendment to eliminate the current age restriction on second units and establish a ministerial review process.
- The cities of Buena Park, Orange and Santa Ana should amend their Zoning Codes to specify provisions for SRO units.
- The cities of Fountain Valley and Orange should amend their Zoning Codes to regulate transitional and supportive housing as a residential use, subject to the same standards as other residential uses of the same type in the same zone.

4. Density Bonus Incentives

Impediment B-4: All 16 jurisdictions have adopted local density bonus ordinances which implement state density bonus law, providing density and other development incentives and concessions for the provision of affordable housing. However, with the recent addition of anti-displacement provisions under AB 2222, and modified parking standards for transit-accessible projects under AB 744, jurisdictions should update their density bonus ordinances to reflect these new State requirements.

Recommendations for All Jurisdictions:

- All 16 jurisdictions should amend the Zoning Code to reflect current State density bonus law.

Table 8-1: City of San Clemente Fair Housing Action Plan 2015/16 - 2019/20		
Impediment	Actions	Time Frame
A. Regional, Private Sector Impediments Carried Over from 2010 Regional and Subregional AI		
A-1. Housing Discrimination	<p>Data indicates housing discrimination continues to exist throughout Orange County, as evidenced by the number of complaints and fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County. An average of 85 cases were opened in the participating cities over the past three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race.</p>	<p>a) Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature.</p> <p>b) Conduct focused outreach to small property owners/landlords; conduct property manager trainings on a regular basis; promote fair housing certificate training.</p> <p>c) Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.</p> <p>d) Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation.</p>
A-2. Racial and Ethnic Segregation	<p>Residential segregation refers to the degree in which groups live separately from one another. As presented within the Community Profile, there are areas of racial/ethnic concentrations in the County. Approximately ten percent of households are considered to be limited English-speaking households.</p>	<p>a) Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in areas of racial/ethnic concentrations.</p> <p>b) Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate affordable housing throughout the community through: 1) available financial assistance;</p>

Table 8-1: City of San Clemente Fair Housing Action Plan 2015/16 - 2019/20		
Impediment	Actions	Time Frame
	<p>2) flexible development standards; 3) density bonuses; and 4) other zoning tools.</p> <p>c) Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups.</p> <p>d) Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.</p> <p>e) Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.</p>	
A-3. Denial of Reasonable Modifications/ Reasonable Accommodations	<p>a) Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations/ why denial of reasonable modifications/ accommodations is unlawful.</p> <p>b) Provide information on the unlawful practice of denying reasonable modifications/accommodations at fair housing seminars conducted by the Apartment Association of Orange County.</p>	Ongoing 2015/16 - 2019/20
A-4. Discriminatory Advertising	<p>a) Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.</p>	Ongoing 2015/16 - 2019/20

Table 8-1: City of San Clemente Fair Housing Action Plan 2015/16 - 2019/20		
Impediment	Actions	Time Frame
<p>single adult" have the effect of housing discrimination.</p>	<p>b) Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.</p>	
<p>A-5. Hate Crimes</p> <p>Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of an average of 35 households per year in the 16 participating Orange County cities. Of the total 169 hate crime incidents reported between 2010 and 2014, 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, 2 to disability and 2 to gender identity.</p>	<p>a) Continue to monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.</p> <p>b) Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes – inclusive of housing resources.</p>	<p>Ongoing 2015/16 - 2019/20</p>
<p>A-6. Unfair Lending</p> <p>Disparities in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 Orange County cities creates an impediment to fair housing choice as they have loans denied at rates 1.5 to 1.6 times greater than White applicants. In addition, Hispanic residents, which comprise 34 percent of Orange County's population, account for just 10 percent of home purchase loans, and the percentage of completed mortgage loans by Hispanics</p>	<p>a) As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark.</p> <p>b) As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations.</p> <p>c) Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. Each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that</p>	<p>Annually 2017</p> <p>Ongoing 2015/16 - 2019/20</p>

Table 8-1: City of San Clemente Fair Housing Action Plan 2015/16 - 2019/20		
Impediment	Actions	Time Frame
has decreased in each of the past five years.	<p>education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.</p> <p>d) Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.</p> <p>e) Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.</p> <p>f) Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.</p>	<p>2017</p> <p>2017</p> <p>2016</p>
B. Public Sector Impediments (Only actions pertinent to San Clemente identified)		
B-1. Housing Element Compliance	<p>According to HCD, of the 16 participating jurisdictions, 15 Housing Elements were in compliance, and San Clemente submitted a draft Housing Element for the current 2014-2021 period in early 2016.</p> <p><u>Jurisdiction-Specific Actions:</u></p> <p>a) The City of San Clemente should pursue State certification of its Housing Element.</p>	2016
B-2. Housing for Persons with Disabilities	<p>Disability is the greatest cited basis for discrimination, comprising over half of the fair housing cases in the 16 cities over the</p> <p><u>Jurisdiction-Specific Actions:</u></p>	2016

Table 8-1: City of San Clemente Fair Housing Action Plan 2015/16 - 2019/20

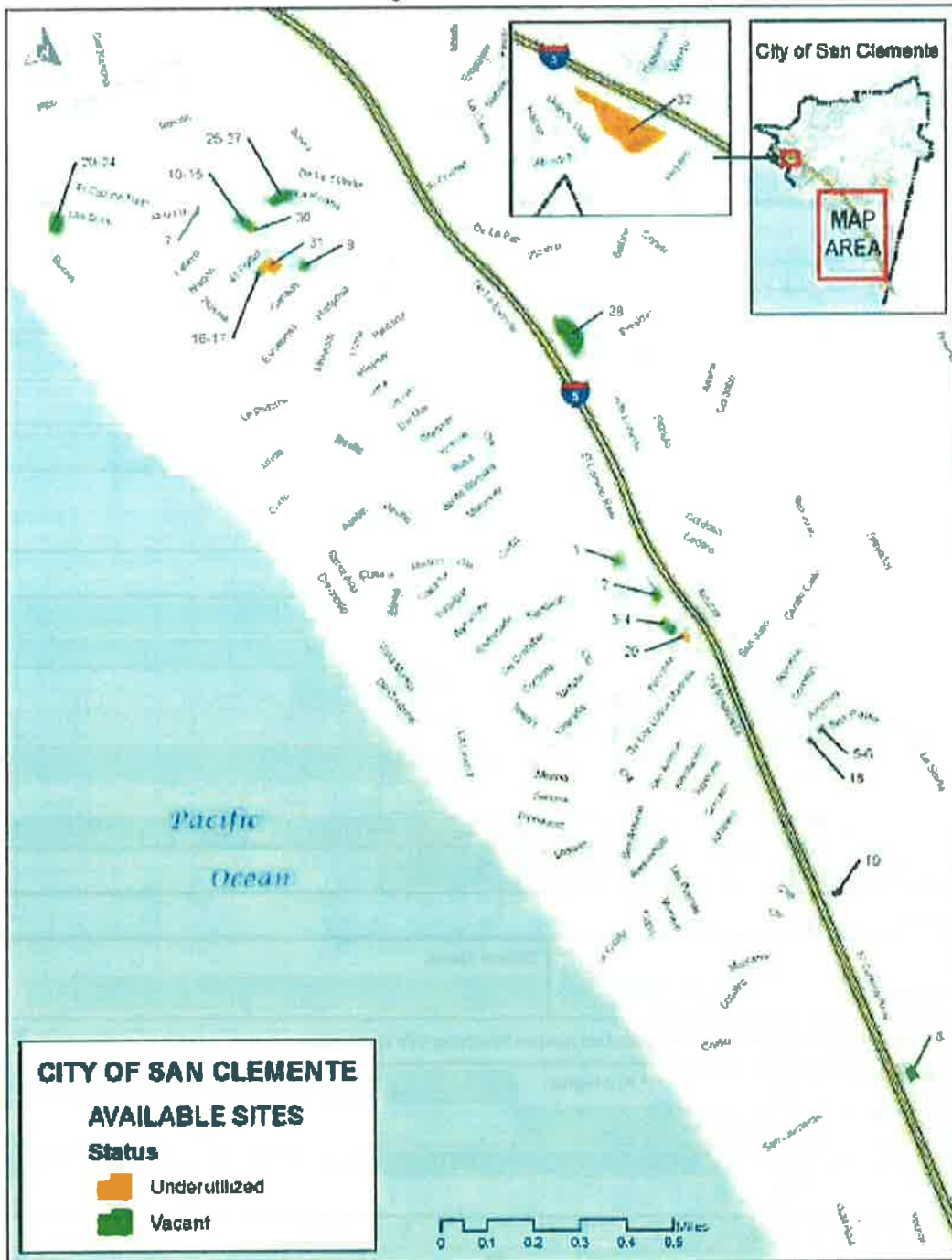
Impediment	Actions	Time Frame
<p>past three years. With the exception of San Clemente, all participating jurisdictions have adopted formal policies and procedures to reasonably accommodate the housing needs of disabled residents. However, three cities charge a fee (Anaheim, Tustin and La Habra), and one city requires a public hearing (Newport Beach). Imposing a fee or a requirement for a public hearing could serve as an impediment to persons with disabilities.</p>	<p>a) The City of San Clemente should adopt a formal Reasonable Accommodations policy and procedure.</p>	
<p>B-4. Density Bonus Incentives</p>	<p>a) All 16 jurisdictions should amend their Zoning Codes to reflect current State density bonus law.</p>	<p>2016</p>
	<p>All 16 jurisdictions have adopted local density bonus ordinances which implement state density bonus law, providing density and other development incentives and concessions for the provision of affordable housing. However, with the recent addition of anti-displacement provisions under AB 2222, and modified parking standards for transit-accessible projects under AB 744, all 16 jurisdictions should update their density bonus ordinances to reflect these new State requirements.</p>	

Residential Site Inventory

Map ID	APN	Property Address	Acres	GP	Zone	Density	Potential Units	Density Bonus Units	Total Units	AH Overlay	From Previous HE
Vacant Sites											
1	692-152-23	1010 S. El Camino Real	0.30	NC	NC2	24.0	7	2	9	✓	✓
2	692-131-06	near 1201 S. El Camino Real	0.42	NC	NC2	24.0	10	--	10	✓	✓
3	692-171-16	1430 S. El Camino Real	0.22	NC	NC2	24.0	5	2	7	✓	✓
4	692-171-19	1430 S. El Camino Real	0.22	NC	NC2	24.0	5	2	7	✓	✓
5	690-422-03	near 2201 S. El Camino Real	0.10	NC	NC3	24.0	2	1	3	✓	✓
6	690-422-04	near 2201 S. El Camino Real	0.10	NC	NC3	24.0	2	1	3	✓	✓
7	692-362-08	1400 N. El Camino Real	0.11	NC	NC2	24.0	2	--	2	✓	
8	060-071-25	near 2801 S. El Camino Real	0.37	MU	MU5 1	36.0	13	4	17	✓	✓
9	692-395-27	902 N. El Camino Real	0.27	NC	NC2	24.0	6	2	8	✓	✓
10	692-381-25	1300 block N. El Camino Real	0.09	NC	NC2	24.0	2	1	3	✓	✓
11	692-381-26	1300 block N. El Camino Real	0.09	NC	NC2	24.0	2	1	3	✓	✓
12	692-381-27	1300 block N. El Camino Real	0.09	NC	NC2	24.0	2	1	3	✓	✓
13	692-381-28	1300 block N. El Camino Real	0.10	NC	NC2	24.0	2	1	3	✓	✓
14	692-381-29	1300 block N. El Camino Real	0.10	NC	NC2	24.0	2	1	3	✓	✓
15	692-381-30	1300 block N. El Camino Real	0.10	NC	NC2	24.0	2	1	3	✓	✓
16	692-394-06	100 W. El Portal	0.09	NC	NC2	24.0	2	1	3	✓	✓
17	692-394-07	100 W. El Portal	0.09	NC	NC2	24.0	2	1	3	✓	✓
18	690-445-02 690-445-03	1502 S. El Camino Real	0.15	NC	NC2	24.0	3	--	3	✓	
19	060-041-02 060-041-03	2400 S. El Camino Real	0.15	NC	NC3	24.0	4	--	4	✓	
20	692-121-14	1631 Calle Las Bolas	0.15	RH	RH	36.0	5	2	7		✓
21	692-121-15	1629 Calle Las Bolas	0.15	RH	RH	36.0	5	2	7		✓
22	692-121-16	1603 Calle Colina	0.12	RH	RH	36.0	4	2	6		✓
23	692-121-17	1601 Calle Colina	0.14	RH	RH	36.0	5	3	8		✓
24	692-121-13	1633 Calle Las Bolas	0.15	RH	RH	36.0	5	2	7		✓
25	057-151-26	111 La Ronda	0.17	RM	RM	24.0	4	1	5		✓
26	057-151-04	115 La Ronda	0.15	RM	RM	24.0	3	1	4		✓
27	057-151-05	119 La Ronda	0.16	RM	RM	24.0	3	1	4		✓
28	690-013-01	101 North La Esperanza	2.18	RM	RM	24.0	30	0	30	✓	
	Total		6.60				139	36	176		
Underutilized Sites											
29	692-173-04	1502 S. El Camino Real	0.25	MU	MU3	24.0	5	--	5	✓	
30	692-381-31	1200 block N. El Camino Real	0.09	NC	NC2	24.0	2	1	3	✓	✓
31	692-394-17	101 W. El Portal	0.65	NC	NC2	24.0	15	5	20	✓	✓
32	691-231-06	Shorecliffs Golf Course	6.00	RH	RH	36.0	216	0	216	✓	
	Total		6.99				238	6	244		

Source: City of San Clement 2013-2021 Housing Element

Residential Site Inventory Map



Source: City of San Clement 2013-2021 Housing Element

Application for Federal Assistance SF-424

* 1. Type of Submission:		* 2. Type of Application:		* If Revision, select appropriate letter(s):
<input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		<input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received:		4. Applicant Identifier:		
<input type="text"/>		<input type="text"/>		
5a. Federal Entity Identifier:		5b. Federal Award Identifier:		
<input type="text" value="B-16-MC-06-XXXX"/>		<input type="text" value="B-16-MC-06-XXXX"/>		
State Use Only:				
6. Date Received by State:		7. State Application Identifier:		
<input type="text"/>		<input type="text"/>		
8. APPLICANT INFORMATION:				
* a. Legal Name: <input type="text" value="CITY OF SAN CLEMENTE"/>				
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:		
<input type="text" value="XX-XXXXXX"/>		<input type="text"/>		
d. Address:				
* Street1:	<input type="text" value="100 AVENIDA PRRSIDIO"/>			
Street2:	<input type="text"/>			
* City:	<input type="text" value="SAN CLEMENTE"/>			
County/Parish:	<input type="text" value="ORANGE"/>			
* State:	<input type="text" value="CA: California"/>			
Province:	<input type="text"/>			
* Country:	<input type="text" value="USA: UNITED STATES"/>			
* Zip / Postal Code:	<input type="text" value="92672-0000"/>			
e. Organizational Unit:				
Department Name:		Division Name:		
<input type="text" value="COMMUNITY DEVELOPMENT"/>		<input type="text"/>		
f. Name and contact information of person to be contacted on matters involving this application:				
Prefix:	<input type="text" value="MS."/>	* First Name:	<input type="text" value="CECILIA"/>	
Middle Name:	<input type="text"/>			
* Last Name:	<input type="text" value="GALLARDO-DALY"/>			
Suffix:	<input type="text"/>			
Title:	<input type="text" value="COMMUNITY DEVELOPMENT DIRECTOR"/>			
Organizational Affiliation:				
<input type="text"/>				
* Telephone Number:	<input type="text" value="949-361-6106"/>	Fax Number:	<input type="text"/>	
* Email:	<input type="text" value="Gallardo-Daly@san-clemente.org"/>			

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 services to low- moderate-income residents, public infrastructure improvements, housing rehab & program admin, including fair housing services.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="345,089.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="18,000.00"/>
* g. TOTAL	<input type="text" value="363,089.00"/>

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

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

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

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

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

Yes No

If "Yes", provide explanation and attach

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

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG 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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

City Manager

Title

Specific CDBG 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 housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 certifies that 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 activities which the grantee certifies are designed to meet other community development needs having a 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);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2016 , _____ (a period specified by the grantee consisting 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.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

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

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

Signature/Authorized Official

Date

City Manager

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. 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.

CODE TRAK INSPECTION ACTIVITY REPORT

Case Number CE2016-0391 **Site Address** 4719 Aqua Del Caballete
Opened 5/12/2016 **Resident**
Closed **Owner** Sullivan, Patrick J & Elizabet
Parent Project No. **Case Description** EMS showed up..is it a group home?

Scheduled	Completed	Type	Inspector	Inspection R	Remarks	Inspector Comments
6/8/2016		CE-INSPECTION	SFF			

Case Number CE2016-0688 **Site Address** 102 Via Zapata
Opened 6/6/2016 **Resident**
Closed **Owner** ANDINO, REINOL POLSLEY ANDINO, TINA E
Parent Project No. **Case Description** They are advertising a 2 bedroom 1 bath apartment. Is this u

Scheduled	Completed	Type	Inspector	Inspection R	Remarks	Inspector Comments
6/8/2016		CE-INSPECTION	SFF			

Case Number CE2016-0699 **Site Address** 230 W Marquita
Opened 6/7/2016 **Resident**
Closed **Owner** Bannister, Bonnie L Dale
Parent Project No. **Case Description** Blighted home: overgrown vegetation & termites

Scheduled	Completed	Type	Inspector	Inspection R	Remarks	Inspector Comments
6/8/2016		CE-INSPECTION	SFF			

Case Number CE2016-0700 **Site Address** 205 Trafalgar Ln
Opened 6/7/2016 **Resident**
Closed **Owner** Cates, David Cee Trust
Parent Project No. **Case Description** Unpermitted STLU

Scheduled	Completed	Type	Inspector	Inspection R	Remarks	Inspector Comments
6/8/2016		CE-INSPECTION	SFF			

Case Number CE2016-0703 **Site Address** 135 Avenida Barcelona
Opened 6/7/2016 **Resident**
Closed **Owner** Laura J. Clark
Parent Project No. **Case Description** Denied STLU permit; carport conversion

Scheduled	Completed	Type	Inspector	Inspection R	Remarks	Inspector Comments
6/8/2016		CE-INSPECTION	SFF			

VI. 2016-2017 Annual Action Plan

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

Introduction

Ongoing reductions and fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the four-year time period of the Consolidated Plan. The loss of redevelopment funding had a significant impact on the resources available to the City to undertake affordable housing activities. Due to recent housing development activity, the City does have access to In-lieu Affordable Housing Fee resources. Additionally, housing voucher/certificate resources (via OCHA) and “Good Neighbor Funding,” i.e., social service grants from the City’s General Fund will be available to carry out activities that support the goals of the Consolidated Plan.

Table 59 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	345,089	18,000	0	363,089	Annual HUD CDBG allocation, program income and prior year funds. “Amount Available Remainder of ConPlan” assumes 7% reduction in CDBG funding over a 3-year period.

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

In past years, the City was able to leverage federal funds with local redevelopment funds. In 2012 the State Legislature and the Governor passed legislation to dissolve all redevelopment agencies in the State. As a result, this funding source is no longer available. The City has identified other resources that will be available to carry out activities that address the goals of the Consolidated Plan:

- OCHA reports that as of March 31, 2016, a total of 142 San Clement households received rental assistance. It is anticipated that a similar number of households will be assisted annual over the four-year period of the Consolidated Plan.
- On an annual basis, the City allocates approximately \$80,000 in General Fund resources to support a variety of social service programs in the community, i.e., Good Neighbor Funding. Several types of services are funded with these resources including funding for homelessness prevention and interim housing for homeless families with children.
- In-lieu Affordable Housing Fund resources generated via the City's Inclusionary Housing Program (IHP) are available to assist nonprofit agencies purchase land or existing housing units for the provision of long-term affordable housing. The IHP was adopted by the City in 1980 in an effort to increase the supply of affordable housing commensurate with new market-rate development within the City. The program requires developers of six or more units to set aside 4% of total units developed for households earning 50% or less of the area median income. The affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee. City staff indicates recent housing development has generated a fund of approximately \$1,000,000. No specific project(s) is presently slated to benefit from this resource; however, these funds should be considered one-time funds as most large housing scale development City is complete and the City approaches build-out.

CDBG does not require matching funds.

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

As indicated in the Strategic Plan, San Clemente is nearly “built-out” with limited vacant land. The City’s Housing Element identifies several vacant and underutilized sites that may be suitable for housing development (**Attachment L**). Nearly all vacant residential sites are small, infill parcels located west of Interstate 5. Additionally, the majority of parcels identified in the Housing Element residential sites inventory are in the City’s Affordable Housing Overlay. The intent of the Overlay Zone is to facilitate the development of affordable rental and for sale housing in the City’s commercial and mixed use zones.

Discussion

Funding resources to implement the City’s 2016-2017 Annual Action Plan are limited. HUD has notified the City that its 2016-2017 CDBG grant is \$345,089. This amount is \$13,683 (4.13%) more than the City’s 2015-2016 CDBG allocation; however, it is worth noting that since the City became a CDBG recipient community in 2006, its CDBG allocation has decreased by 44.5%. It is anticipated that CDBG funding will continue to be reduced. CDBG-funded housing rehabilitation loan repayments have provided the City with additional source of funding; however, loan repayments are susceptible to the fluctuations of the economy and are unpredictable.

HUD has begun to invest additional resources into housing assistance vouchers and certificates, and OCHA has aggressively pursued these new resources. The City will continue to support OCHA’s efforts to secure new rental assistance resources. Additionally, for the foreseeable future, the City will continue to support programs serving City residents with Good Neighbor social service grants. As outlined above, San Clemente has identified vacant and underutilized land that may be suitable housing development, additionally, in lieu fees for affordable housing development may also be available to support affordable housing activities.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Table 60 – Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Infrastructure Improvements	2016	2019	Non-Housing Community Development	CDBG census tracts	Public Improvements	CDBG: \$129,311	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4,100 Persons Assisted
2	Single Family Housing Rehabilitation	2016	2019	Affordable Housing	Citywide	Housing Rehabilitation	CDBG: \$93,000	Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	Public Services	2016	2019	Non-Housing Community Development	Citywide	Public Services	CDBG: \$51,762	Public service activities other than Low/Moderate Income Housing Benefit: 2,600 Persons Assisted
4	Commercial Rehabilitation	2016	2019	Non-Housing Community Development	CDBG census tracts	Commercial Rehabilitation	CDBG: \$20,000	Businesses assisted: 9 Businesses Assisted
5	Fair Housing Services	2016	2019	Administration	Citywide	Administration	CDBG: \$4,500	Other: 120 Other
6	Program Administration	2016	2019	Administration	Citywide	Administration	CDBG: \$64,516	Other: 1 Other

Goal Descriptions

1	Goal Name	Public Infrastructure Improvements
	Goal Description	Sidewalk improvements
2	Goal Name	Single Family Housing Rehabilitation
	Goal Description	Housing rehabilitation assistance to improve residential properties
3	Goal Name	Public Services
	Goal Description	Social services for seniors, victims of domestic violence, youths and lower income persons
4	Goal Name	Commercial Rehabilitation
	Goal Description	Business façade improvements
5	Goal Name	Fair Housing Services
	Goal Description	Outreach, education and enforcement services
6	Goal Name	Program Administration
	Goal Description	CDBG program oversight and coordination

Projects

AP-35 Projects – 91.220(d)

Introduction

The following activities have been allocated CDBG funds for Fiscal Year (FY) 2016-2017.

Table 61 - Project Information

#	Project Name
1	Sidewalk Improvements
2	Home Rehabilitation Program
3	Commercial Facade and Sign Grants
4	Age Well Senior Services
5	Camino Health Center
6	Laura's House
7	Fun On The Run
8	Fair Housing Foundation
9	CDBG Program Administration

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

The City will allocate a portion of its CDBG funds for activities that address the housing and service needs of the elderly and lower income households, especially those at risk of becoming homeless. According to data from the Market Analysis these households are contributing significant portions of their income to maintain their housing. Consistent with the City's Homeless Strategy, resources will be allocated to help these households remain housed in place rather than fall into homelessness. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding for San Clemente households. The City's housing rehabilitation program will also focus its efforts to assist elderly homeowners undertake improvement of respective residences to address specific household needs.

AP-38 Project Summary

Project Summary Information

1	Project Name	Sidewalk Improvements
	Target Area	CDBG census tracts
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$129,311
	Description	CDBG funds for sidewalk improvements - Calle Puente
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 4,100 individuals will benefit from sidewalk improvements
	Location Description	CT: 421.07 BG: 2 and CT: 421.08 BG: 4 (54.61% Low and Moderate-Income)
	Planned Activities	Construction of sidewalks, curbs and ADA ramps
2	Project Name	Home Rehabilitation Program
	Target Area	Citywide
	Goals Supported	Single Family Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$93,000
	Description	CDBG funds (\$75,000 in FY 16-17 funds plus \$18,000 in program income) for housing rehabilitation loans or grants to address housing/building code deficiencies and deferred building maintenance.
	Target Date	6/30/2017

Estimate the number and type of families that will benefit from the proposed activities	6 owner occupied housing units
Location Description	Citywide
Planned Activities	Rehabilitation of owner occupied housing units
3 Project Name	Commercial Facade Sign Grants
Target Area	CDBG census tracts
Goals Supported	Commercial Rehabilitation
Needs Addressed	Commercial Rehabilitation
Funding	CDBG: \$20,000
Description	Grants to update or upgrade business signs or facades
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	To be determined
Location Description	To be determined but located within CDBG-eligible Census Tract Block Groups
Planned Activities	Grants to business owners to update or upgrade signs and/or facades
4 Project Name	Age Well Senior Services
Target Area	Citywide
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$6,000
Description	Case management and support services for seniors and frail elderly

Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	250 seniors and frail elderly
Location Description	Citywide
Planned Activities	Case management and in-home support services for seniors and frail elder
5 Project Name	Camino Health Center
Target Area	Citywide
Goals Supported	Commercial Rehabilitation
Needs Addressed	Public Services
Funding	CDBG: \$18,000
Description	Low cost medical and pediatric dental services for low and moderate-income persons
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	1,750 low and moderate-income persons
Location Description	1031 Avenida Pico, Ste. 104, San Clemente CA
Planned Activities	Primary medical care and pediatric dental services at reduced cost for lower income persons and indigents
6 Project Name	Laura's House
Target Area	Citywide
Goals Supported	Public Services
Needs Addressed	Public Services

	Funding	CDBG: \$10,000
	Description	Counseling and support services for victims of domestic violence
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	250 individuals
	Location Description	Citywide
	Planned Activities	Counseling and support services for victims of domestic violence
7	Project Name	Fun On The Run
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,762
	Description	Youth recreation program
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 350 youths
	Location Description	Citywide
	Planned Activities	After school recreation and homework assistance program with a focus on low and moderate-income children.
8	Project Name	Fair Housing Foundation
	Target Area	Citywide

Goals Supported	Fair Housing Services
Needs Addressed	Administration
Funding	CDBG: \$4,500
Description	Fair housing outreach, education and enforcement services with the goal to reduce and eliminate impediments to the fair access of housing
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	120 households
Location Description	Citywide
Planned Activities	Fair housing outreach, education and enforcement services including: landlord, tenant and property management fair housing training; community outreach and education; complaint investigation and enforcement services
9 Project Name	CDBG Program Administration
Target Area	Citywide
Goals Supported	Program Administration
Needs Addressed	Administration
Funding	CDBG: \$64,516
Description	CDBG program oversight and coordination
Target Date	6/30/2017
Estimate the number and type of families that will benefit from the proposed activities	Not applicable
Location Description	910 Calle Negocia Ste. 100, San Clemente CA

	Planned Activities	Program oversight and coordination including management of public service grants, housing and commercial rehabilitation programs, and preparation of required applications and reports.
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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

Some activities slated for CDBG-funding during FY 2016-2017 will be available on a citywide basis to income eligible individuals and households. These activities include public services and housing rehabilitation. Activities such as commercial rehabilitation and sidewalk improvements will be limited to specific areas of the City where a majority of residents meet HUD’s income limits. A map of the City’s CDBG Eligible Areas is provided provides in the Consolidated Plan Appendix (**Map 1: CDBG Eligible Areas Map**).

Table 62 - Geographic Distribution

Target Area	Percentage of Funds
CDBG census tracts	41
Citywide	59

Rationale for the priorities for allocating investments geographically

Funding is predominately allocated on a citywide basis as the City’s primary intent is to serve lower income households that are in need of services/assistance regardless of where they live in the City. As the City’s CDBG-eligible areas tend to be older sections of the City, area wide activities (e.g., public improvements) will help to improve and sustain these neighborhoods.

Discussion

As indicated above, CDBG funds will be mainly allocated to programs that serve lower income residents regardless of where they live (approximately 60% of available funds). The balance will be allocated to activities that will benefit residents of areas identified by HUD as having a significant number of lower income residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City will utilize limited CDBG funds and program income to provide housing rehabilitation loans and grants to eligible homeowners. No CDBG funding is allocated in 2016-2017 for homeless or other special needs populations housing.

Table 63 - One Year Goals for Affordable Housing by Support Requirement

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

(16-17 Action Plan)

Table 64 - One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	6
Acquisition of Existing Units	0
Total	6

Discussion

Due to limited resources, the City will focus 2016-2017 CDBG funds on housing rehabilitation of existing owner-occupied housing units. While not the primary focus of the program, some special-needs households (senior and disabled) may be assisted during the year by this program. City general funds will be allocated to support homeless programs including homelessness prevention, interim housing and supportive services.

AP-60 Public Housing – 91.220(h)

Introduction

San Clemente 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

San Clemente does not own or manage public housing.

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

Introduction

As outlined in the Strategic Plan, the City's homeless strategy places an emphasis on preventing homelessness. Based on the proposition that it is less expensive and disruptive to keep a household housed in place, the City will use CDBG resources to fund programs that provide services aimed at helping households to maximize the amount of income they can contribute toward housing. Services to be funded with CDBG include reduced cost after-school childcare, medical services, and case management/services for seniors. Funds will also be allocated to support counseling services for victims of domestic violence – these services include preparation of safe housing plans for client households. Non-CDBG funds will be utilized to support homelessness prevention, support services and interim housing for homeless families.

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 of San Clemente does not directly fund homeless outreach services; however, the City does support agencies that work directly with both sheltered and unsheltered homeless populations. Agencies such as Family Assistance Ministries conduct extensive outreach and vulnerability assessments throughout San Clemente and neighboring communities. Other agencies conduct similar outreach and assessment services for specific homeless populations such as victims of domestic violence and transitional age youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

No 2016-2017 CDBG funding is allocated to directly support emergency and transitional housing; however, as indicated in the Housing Market Analysis, there are 40 transitional shelter beds in the community managed by two agencies. Shelter beds are typically earmarked for special need populations such as homeless families and transitional age youth. As previously indicated, there are shelter beds for victims of domestic violence in the City; however, because City residents are typically not housed at this location, they are not included as a shelter resource.

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

As outlined above, the City will focus its CDBG resources on preventing homelessness as opposed to funding services that assist those already homeless. It is important to note that the City's strategy does not exclude funding such programs. The City will continue to support agencies that provide these services by providing Certifications of Consistency with the Consolidated Plan (if applicable and merited), and will also continue to support the regional CoC as it seeks resources to address regional homeless issues.

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.

It is the City's strategy to help a household at risk of becoming homeless, to stay in their home. The City will continue to participate in regional homeless planning efforts including the OC CoC's Discharge Plan, which aims to prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

Discussion

The City's homeless strategy is to help prevent homelessness and to support local service providers' efforts to seek additional resources. CDBG funds will be allocated to safety net services that will help households at risk of homelessness redirect limited income toward housing. City general funds will be allocated to support agencies that provide a variety of shelter and support services for the homeless.

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction:

Barriers to affordable housing and actions to overcome barriers have been previously discussed in the Consolidated Plan and are outlined in the City's Housing Element.

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

Housing Resources: The City will encourage developers to seek private and other public funding sources to reduce the development cost of housing units. To the extent that funds are available, Inclusionary Housing in-lieu fees may be made available to assist nonprofit agencies purchase land or existing housing units in order to create new long-term affordable housing opportunities.

Environmental Review. The Housing Element identifies exemptions that state and federal laws provide to streamline the environmental review process. City staff will assist property owners and developers navigate the various environmental review regulations to help reduce the holding cost associated with the time needed to comply with these reviews.

Planning and Development Fees. The City does not typically offer fee waivers; however, the City Council may approve a waiver, offer deferred or reduced fees, or supplement fees with funds from the In-lieu Fee Fund, for affordable housing projects.

Permit and Processing Procedures. The City's Housing Element outlines several time and cost savings development processes aimed at reducing the holding time of housing developers. For affordable housing project, City staff will interact with project sponsors early in the process to determine project feasibility and will assist the developer through the entitlement process.

Land Use Controls. In general, land use controls are necessary to protect the public health, safety and welfare and maintain the quality of life. The City has implemented reasonable controls which are appropriate for the community.

Tax Policies: There is no local tax.

Discussion:

The City's Housing Element outlines a comprehensive plan to address barriers to affordable housing. The Consolidated Plan mirrors this plan.

AP-85 Other Actions – 91.220(k)

Introduction:

Outlined below are the actions the City will implement to address the sub-strategies of the Strategic Plan.

Actions planned to address obstacles to meeting underserved needs

The City will allocate a portion of its CDBG funds for activities that address the service needs of the elderly and lower-income households. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding especially for senior and low-income households. The City's housing rehabilitation programs will be available to assist elderly homeowners undertake improvement of respective residences to address specific household needs.

Actions planned to foster and maintain affordable housing

The City of San Clemente has identified the actions it will undertake during FY 2016-2017 to foster and maintain affordable housing. The Consolidated Plan identified programs such as Housing Rehabilitation assistance as the means to maintain and improve housing currently available to low and moderate-income residents. By providing deferred payment loans and grants, lower income households are able to rehabilitate their residence to meet basic housing quality standards and incur zero or minimal additional housing costs. An estimated six housing units will be assisted with CDBG funds during the 2016-2017 Program Year.

Actions planned to reduce lead-based paint hazards

To ensure compliance with program regulations, all housing units, that were constructed before 1978, that are rehabbed with CDBG resources, will be tested for lead-paint hazards. If lead is found, additional assistance may be provided to eliminate or mitigate lead hazards.

Actions planned to reduce the number of poverty-level families

As previously outlined, approximately 8.6% of the City's population is living at or below the poverty level including 11.5% of children under the age of 18 and 5.9% of seniors (age 65 and older). During FY 2016-2017, the City will fund the following activities with the goal of reducing the number of households living in poverty:

- Housing programs including rehabilitation for lower income and senior homeowners, and rental assistance for very low-income renters (the latter via the Orange County Housing Authority).
- Public services that provide free or reduced cost services to lower income households that will help to improve quality of life.
- Commercial property upgrades to improve neighborhood aesthetics and expand economic opportunities for lower income residents.

Actions planned to develop institutional structure

The City has made an effort to develop an institutional structure that will help identify and access resources to improve the community. The City will continue to work with nonprofit public entities to deliver public services. As a member of the Orange County Continuum of Care Community Forum, the City will provide critical information to the County of Orange for preparation of the County's Continuum of Care Homeless Assistance grant application to HUD. The City will also continue to assist the OCHA implement its Five-year Public Housing Authority (PHA) Plan for the provision of rental assistance vouchers and certificates.

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

The City of San Clemente does not operate public housing. OCHA provides rental assistance in the community. Federal legislation requires that the Housing Authority prepare five-year and one-year plans that highlight its mission, goals and objectives as it relates to public and assisted housing programs. The City will review the Authority's plans and will provide OCHA the opportunity to review and consult with the City regarding its Consolidated Plan. The goal of this cross-consultation is to provide consistent and coordinated housing services for City residents.

San Clemente has also developed positive working relationships with private and nonprofit housing developers (e.g. Jamboree Housing). Ongoing relationships with local nonprofits also promotes the efficient and effective use of limited resources public resources for housing.

Discussion:

One HUD-required strategy not discussed above are the City's action steps to affirmatively further fair housing via the Analysis of Impediments (AI) for Fair Housing Choice. As indicated in the Strategic Plan, the City's current AI is summarized in the Appendix (**Attachment K**). Action steps to be taken during FY 2016-2017 are also found in **Attachment K**.

Program Specific Requirements

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

Introduction:

Each HUD program that is covered by the Consolidated Plan regulations must address certain program specific requirements. Below are the requirements for the CDBG program as prescribed by the Consolidated Plan template.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	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 overall 70% benefit for low and moderate-income requirement during the one-year 2016 Program Year.

Future
Comments from
Human Affairs
Committee
meeting of
June 8, 2016