
City of San Clemente

2020-2024 Consolidated Plan &
2020-2021 Action Plan

Draft - April 5, 2020

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Executive Summary

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

1. Introduction

The 2020-2024 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.

HUD allocates CDBG funds 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 an urgent need (such as earthquake, flood, or hurricane relief)

HUD requires recipient communities to prepare a Consolidated Plan every three to five years. The 2020-2024 Consolidated Plan will cover the five years of Fiscal Year 2020-2021 through Fiscal Year 2020-2025. 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 50 community profile and housing market data tables. Most tables are prepopulated with data from the U.S. Census Bureau, primarily data from the 2011–2015 American Community Survey (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. Whenever possible, other data sources with current information is used to supplement HUD-provided data.

Based on the analysis of various housing and community variables, and the input of community stakeholders, the following community needs are identified as priority needs:

- Many San Clemente households are paying a significant percentage of their income for housing. Lower-income elderly 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

- In general, the City’s housing and commercial building inventory are in good shape; however, older properties may need rehabilitation to address deferred maintenance
- The 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 Fair Housing Act requires the City to affirmatively further fair housing. San Clemente joined other Orange County cities and the County of Orange to develop a countywide Analysis of Impediments to Fair Housing Choice, a policy document utilized by HUD grantees for this purpose

To address the needs identified through the citizen participation process, the Consolidated Plan outlines an array of goals, outcomes, and activities that the City can implement over five years. Each year an Action Plan will be prepared, which will serve as the City’s expenditure plan for its annual CDBG allocation. HUD has notified the City that it will receive \$356,108 in CDBG funds for Fiscal Year (FY) 2020-2021. The City has also identified \$173,583 in prior year funds that will be available to undertake CDBG-eligible activities during FY 2020-2021. CDBG program income received during the fiscal year will 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 during FY 2020-2021. Planned activities include sidewalk improvements, housing 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 five-year goals and outcomes is provided in the Strategic Plan portion of the Consolidated Plan. A summary of these goals is provided below:

- Infrastructure and Facility Improvements: Improve public infrastructure and facilities that benefit 7,000 low- and moderate-income residents
- Provide housing rehabilitation assistance to 50 homeowners and 2 rental housing owners
- Provide access to public social services for 12,500 low- and moderate-income persons
- Provide access to housing and supportive services for 2,500 persons at risk of becoming homeless or that are homeless
- Support activities to promote economic opportunities by assisting 10 businesses that serve lower-income residents
- Provide CDBG program oversight and coordination including fair housing services to 300 households

3. Evaluation of past performance

Attachment 1 provides a summary of the City's 2016-2019 Consolidated Plan accomplishments through FY 2018-2019. Final accomplishments for the fourth year of the Consolidated Plan cycle (FY 2019-2020) are not available.

4. Summary of citizen participation process and consultation process

A vital component of the Consolidated Plan preparation process is the input of residents and community stakeholders concerning priority needs and activities to address needs. The City encouraged resident participation in a variety of ways:

- Community workshops to obtain public input regarding priority housing and community needs.
- The 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 provided after the public comment period and public hearing.

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

To be provided after the public comment period and public hearing.

7. Summary

The City's Community Development Department has prepared the 2020-2024 Consolidated Plan so the City can 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 2020-2024 Consolidated Plan cycle will cover the five-year period of FY 2020-2021 through FY 2024-2025. As required by HUD, the Consolidated Plan is prepared by using HUD's electronic template.

The 2020-2021 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 \$356,108 in CDBG funds for FY 2020-2021. Prior year and program income funds are also available to undertake eligible activities. CDBG funding is allocated for residential rehabilitation, social services, capital improvements, and program administration. Funded activities will support the broader goals and objectives identified within the Consolidated Plan.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	San Clemente	Community Development

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

Gabriel Perez, City Planner
PerezG@san-clemente.org
(949) 361-6196

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

1. Introduction

Pursuant to HUD regulations, the City took several actions to obtain the input of community residents and stakeholders to develop the Consolidated Plan and the 2020-2021 Action Plan. Consultation efforts included public workshops and a public hearing. The City's Human Affairs Committee held meetings to assess the social service needs of residents and to provide input regarding the Consolidated Plan and Annual Plan funding priorities. The City also consulted with State and regional agencies. 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 2020-2024 Consolidated Plan and 2020-2021 Action Plan.

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

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

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.

Through its annual CDBG Public Service Grants and General Fund Community Service Grants funding process, City staff can ascertain the type of services City residents require, such as, senior, youth, and homeless services. The City has developed partnerships with several local agencies to ensure the delivery of quality social services for residents.

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 the determination of ESG allocations nor evaluating the outcomes, or developing policies and procedures for the administration of the regional Homeless Management Information System (HMIS).

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

Table 2 – Agencies, groups, organizations who participated

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

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

8	Agency/Group/Organization	Laura's House
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Needs of Low/Mod persons
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the housing and service needs of victims of domestic violence
9	Agency/Group/Organization	Camino Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Needs of Low/Mod persons
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the medical/dental service needs of the community including homeless individuals
10	Agency/Group/Organization	Mercy House Transitional Living Centers
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of lower-income households, specifically homeless individuals
11	Agency/Group/Organization	Council On Aging – Southern California
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided information regarding the housing and service needs of elderly and disabled individuals residing in managed care facilities

12	Agency/Group/Organization	County of Orange
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Regional program information
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various county departments provided information regarding public health, public safety, and housing programs
13	Agency/Group/Organization	State of California
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	State program information
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various state departments provided information regarding demographics, public safety, and economics
14	Agency/Group/Organization	City of San Clemente
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Market Analysis Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Various city departments provided data and information regarding community needs and projects and programs eligible for future funding
15	Agency/Group/Organization	Vocational Visions
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided input regarding the needs of adults with developmental disabilities, including developing economic opportunities for this special needs population

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

The City had an open consultation process. No agency was knowingly not consulted.

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

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

Table 3 – Other local / regional / federal planning efforts

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

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

Narrative (optional):

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

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

The City's Citizen Participation Plan, which is presented as **Appendix B**, outlines the City's process to obtain public participation in the development of the Consolidated Plan, Annual Action Plan (AAP), and other facets of the CDBG Program. The opportunities for public input are delineated in Table 4 and summarized below.

- Public Workshop: In November 2019, the City co-hosted a meeting of local social service providers to discuss the upcoming public service grant application process and to obtain input on social service needs. A community meeting was held on January 9, 2020, to gather public input related to the preparation of the 2020-2024 Orange County Analysis of Impediments to Fair Housing (AI). With regard to the Consolidated Plan, on January 30, 2020, a community meeting was held to obtain public input on priority housing and community needs.
- Focus Group and Public Hearing: 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 make recommendations on the allocation of limited CDBG resources. Specifically, the Human Affairs Committee held a public meeting on February 11, 2020, 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 (May 19, 2020) to obtain public input on the draft Consolidated Plan, the proposed allocation of 2020-2021 CDBG funds, and the Orange County AI.
- Notices/Website: Public notices were published in local newspapers of general circulation. Additionally, the draft Consolidated Plan, Action Plan, and AI were 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 2**).

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments not Accepted and Reasons	URL (If applicable)
1	Public Meeting	Social Service Providers	The City conducted a public workshop on 11/6/19 to obtain information regarding community service needs from local service providers. 16 individuals representing 11 organizations attended	Meeting comments centered on local service needs and the CDBG public service grant application process	All comments were accepted	NA
2	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/ broad community	South County region OC-AI public input meeting on 1/9/20	A summary of the comments received is found in Appendix A	Not Applicable	NA
3	Public Meeting	Non-targeted/ broad community	Consolidated Plan Community Workshops - 1/30/20	See Attachment 2	All public comments received by the City received a response at the meeting	NA

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments not Accepted and Reasons	URL (If applicable)
4	Public Meeting	Non-targeted/ broad community	City of San Clemente Human Affairs Committee (7-members) - 2/11/20	The Committee received an overview of FY 20-21 public service grant applications and discussed preliminary funding levels	None	NA
5	Newspaper Ad	Non-targeted/ broad community	Notice of regarding the 30-day public review period (4/18/20 to 5/18/20) and 5/19/20 public hearing	See Attachment 2	TBD	NA
6	Public Hearing	Non-targeted/ broad community	5/19/20 public hearing	See Attachment 2	TBD	NA

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

HUD provided the City with extensive data to assess the housing needs of San Clemente residents. By default, this data is based on HUD's CHAS data for 2011-2015, which is generated by the U.S. Census Bureau. Updated information is provided if available.

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

- Household experiencing "housing problems" (defined below)
- The extent to which housing problems are experienced disproportionately by one or more racial or ethnic groups
- Public housing – **NOTE THE CITY OF SAN CLEMENTE DOES NOT OWN OR MANAGE PUBLIC HOUSING**
- An assessment of homeless needs
- Non-housing Community Development Needs

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

- Lack of a complete kitchen facility or plumbing facilities
- 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 the mortgage payment, taxes, insurance, and utilities.
- Severely Cost Burdened: 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 the mortgage payment, taxes, insurance, and utilities.
- Overcrowded: Defined as a housing unit with more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Severely Overcrowded: Defined as housing with more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

HUD data also characterizes households by types:

- Small Related: 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 (including one-person households)

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

Finally, HUD categorizes households by income:

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

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

Summary of Housing Needs

During the past decade, San Clemente has experienced moderate population growth. According to U.S. Census Bureau data presented in Table 5, the City's population grew by 2% between 2009 and 2015.

San Clemente's median household income grew significantly during this period, rising by 16% to more than \$98,000 in 2015 compared to just more than \$84,500 in 2009.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	63,522	65,020	2%
Households	23,197	24,070	4%
Median Income	\$84,540.00	\$98,153.00	16%

Table 5 - Housing Needs Assessment Demographics

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

UPDATED INFORMATION

A search of current data found that the California Department of Finance estimates San Clemente's January 1, 2019 population at 65,405 – an increase of 3.0% from the 2009 "Base Year" identified in Table 5. In comparison, during roughly the same period, the County's population grew 2.7%, while California's population grew 6.7%. The 2013-2017 American Community Survey 5-Year Estimates indicates there are 24,565 households in the City, and the median income is \$101,843.

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,460	2,675	3,230	2,185	13,515
Small Family Households	575	955	985	800	7,050
Large Family Households	200	295	235	245	1,265
Household contains at least one person 62-74 years of age	565	440	855	375	3,120
Household contains at least one person age 75 or older	500	525	425	300	1,185
Households with one or more children 6 years old or younger	215	340	320	320	1,670

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	70	60	85	20	235	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	140	105	95	50	390	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	35	40	0	155	15	10	30	25	80
Housing cost burden greater than 50% of income (and none of the above problems)	1,030	1,085	235	4	2,354	585	520	675	480	2,260
Housing cost burden greater than 30% of income (and none of the above problems)	40	315	695	310	1,360	110	130	315	390	945
Zero/negative Income (and none of the above problems)	65	0	0	0	65	75	0	0	0	75

Table 7 – Housing Problems Table

Data Source: 2011-2015 CHAS

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,320	1,285	450	70	3,125	600	530	705	505	2,340
Having none of four housing problems	175	370	1,100	685	2,330	225	490	975	925	2,615
Household has negative income, but none of the other housing problems	65	0	0	0	65	75	0	0	0	75

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	440	635	350	1,425	90	275	420	785
Large Related	145	275	30	450	55	20	70	145
Elderly	245	250	240	735	540	325	330	1,195
Other	520	440	355	1,315	30	40	190	260
Total need by income	1,350	1,600	975	3,925	715	660	1,010	2,385

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	440	450	130	1,020	90	230	265	585
Large Related	115	100	20	235	55	20	45	120
Elderly	235	205	70	510	440	255	195	890
Other	505	370	35	910	15	25	175	215
Total need by income	1,295	1,125	255	2,675	600	530	680	1,810

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	220	50	135	0	405	15	10	30	25	80
Multiple, unrelated family households	0	85	0	0	85	0	0	0	0	0
Other, non-family households	0	0	0	50	50	0	0	0	0	0
Total need by income	220	135	135	50	540	15	10	30	25	80

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

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

Table 12 – Crowding Information – 2/2

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

Data provided by HUD's Consolidated Plan template does not provide information for single person households in need of housing assistance. However, according to the Census Bureau (2013-2017 ACS), there are 5,625 one-person households in San Clemente – 2,512 of these households are owners (45% of total one-person households), and 3,113 are renters (55%). According to Table 9, 260 "Other" lower-income owner households are experiencing a housing cost burden, and 1,315 "Other" lower-income renter households have a cost burden. This data table indicates a significant portion of one-person renter households may need housing assistance.

According to information from the OCHA, 31 one-person San Clemente households are presently on the waitlist for federal rental assistance. OCHA reports that 110 one-person San Clemente households currently receive federal rental assistance.

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

Disabled: 2013-2017 ACS data estimates there are 4,632 San Clemente residents with some type of disability – approximately 7.2% of the City's population. Federal laws define a person with a disability as, "Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment." Of residents with a disability, 354 (7.6%) are living below the poverty level. According to OCHA, 78 San Clemente households that currently receive federal rental assistance are disabled households - 17 disabled San Clemente households are on the waitlist for federal rental assistance.

The City's elderly population has significant levels of disabilities. The ASC estimates 25.1% of seniors, age 65 over, have a disability. Since seniors have a much higher probability of being disabled, the housing and service needs for persons with disabilities should grow commensurate with senior population growth. Accessibility housing needs of the disabled population, including the elderly, can typically be addressed through housing rehabilitation programs that provided improvements such as ramps, grab bars, wider doorways, lower sinks, and specialized kitchen cabinets. The City of San Clemente currently offers housing home rehabilitation assistance to qualified homeowners. Disabled senior or disabled homeowners can apply to the program to obtain resources to undertake essential health, safety, and accessibility concerns. Additionally, several local and regional programs provide needed social services and housing for the disabled.

Victims of Domestic Violence: The National Coalition Against Domestic Violence (NCADV) estimates that nationwide, domestic violence hotlines receive 20,000 calls per day. NCADV also reports that one in three women have experienced rape, physical violence, or stalking by an intimate partner in their lifetime. The State of California Department of Justice reports that in 2018, there were 160 calls for assistance related to domestic violence in San Clemente. Laura's House, a leading domestic violence service provider in South Orange County, estimates that only one in seven incidents are reported. Laura's House also estimates that for each victim of domestic violence that receives shelter and support

services, 15 to 20 individuals are turned away from lack of space. The Orange County 2019 Point In Time Survey of the region's homeless estimates that 13.4% of unsheltered homeless in South Orange County are victims of domestic violence, and 15.4% of sheltered homeless in South Orange County are victims of domestic violence.

What are the most common housing problems?

According to HUD data from Table 7, the most common housing problem in San Clemente is a severe housing cost burden (over 50% of income for housing). This housing problem impacts both renter and owner households. A relatively small number of renter households are experiencing crowding and substandard housing (as defined by HUD).

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

Table 9 provides estimates regarding the number of lower-income households impacted by housing cost burden. According to HUD data, approximately a third (34.4%) of all extremely low-income renters have a housing cost burden. Most impacted are very low-income large renter households (61.1%), and extremely low-income senior owner households (45.2%).

Per Table 10, almost half of all extremely low-income renter and very low-income households are most impacted by severe housing cost burden (48.4% and 42.1%, respectively). Among homeowners, 81.4% of low-income "Other" households are experiencing severe housing cost burden. The data also indicates that Extremely low-income Large Related and Elderly homeowners are also experiencing a severe housing cost burden (45.8% and 49.4%, respectively).

As indicated above, few San Clemente households are impacted by crowded housing. According to Table 11, only 620 households live in "crowded" housing (as defined by HUD). HUD's data indicates 540 of these households are renters, and 80 are owners. According to the City's Code Enforcement staff crowding as defined by HUD is not a significant issue. It is important to note that the City is required to enforce the State's housing occupancy standards, which allows more people to live in a housing unit than the limits defined by HUD.

According to Table 7, 235 renter households (and zero owner households) are impacted by substandard housing (as defined by HUD). According to the City's Code Enforcement staff substandard housing as defined by HUD is not a significant issue.

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 low-income households on a fixed income (such as retired seniors) or marginally employed. Due to

limited income and high area housing costs, at-risk households typically have a severe cost burden. Based on HUD data, 1,895 extremely low-income households in San Clemente pay more than 50% of household income for housing (see Table 10). Of these households, approximately 35.6% are “Elderly” households (675), and 28.0% are “Small Related” households (530).

OCHA reports that as of November 2019, there are 62 San Clemente households on the waitlist for federal rental assistance - 26 of these households have one or more children. OCHA waitlist data also indicates 25 waitlist households are small, 18 are elderly households, and five households indicated they are homeless (including two households with a minor child). OCHA data supports the finding that several extremely low-income families are in need of an affordable housing option.

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 rehousing 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

According to HUD data provided in the Consolidated Plan template, substandard and crowded housing are not a significant housing problem in San Clemente. Severe housing cost is the most prevalent housing problem. Most impacted by housing costs appear to be extremely low-income renter and owner households. According to the National Alliance to End Homelessness, low-income households are at a high risk of becoming homeless. A disability, or the need to escape an abusive relationship, can also increase a household’s risk of homelessness.

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

Assess 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

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

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,080	245	140
White	1,420	205	115
Black / African American	35	0	0
Asian	30	25	10
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	400	8	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,260	415	0
White	1,605	395	0
Black / African American	0	0	0
Asian	25	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	630	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,165	1,070	0
White	1,710	815	0
Black / African American	0	25	0
Asian	70	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	370	190	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,275	910	0
White	1,030	800	0
Black / African American	0	0	0
Asian	55	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	65	0	0
Hispanic	105	90	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

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

Discussion

As previously described, housing cost burden is a prevalent housing problem in San Clemente. Tables 13 through 16 indicate that regardless of race or ethnicity, over half of lower-income San Clemente households are experience a housing cost burden. Depending on the income category, Hispanics/Latinos, Asians, Black/African Americans, and American Indians/Alaska Natives are disproportionately impacted by housing cost problems.

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

Assess 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

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

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,920	400	140
White	1,300	325	115
Black / African American	35	0	0
Asian	30	25	10
American Indian, Alaska Native	14	0	0
Pacific Islander	0	0	0
Hispanic	400	8	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,815	860	0
White	1,290	710	0
Black / African American	0	0	0
Asian	25	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	500	130	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

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

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,155	2,075	0
White	835	1,695	0
Black / African American	0	25	0
Asian	50	40	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	260	300	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

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

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	575	1,610	0
White	465	1,365	0
Black / African American	0	0	0
Asian	55	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	65	0
Hispanic	60	135	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

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

Discussion

Tables 17 through 20 indicate that regardless of race or ethnicity, a significant percentage of extremely low-income San Clemente households are experiencing a severe housing problem. The data indicates lower-income Hispanics, Black/African American, and Asian households are disproportionately impacted by severe housing cost burden at various income categories.

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

Assess 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:

HUD’s definition of disproportionately greater need is provided above. The HUD data below relate specifically to housing cost burden, which is a significant housing problem in San Clemente.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,715	4,915	5,290	140
White	11,315	4,075	4,005	115
Black / African American	105	15	20	0
Asian	595	105	145	10
American Indian, Alaska Native	10	0	14	0
Pacific Islander	50	65	0	0
Hispanic	1,355	560	955	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

UPDATED INFORMATION

HUD’s Consolidated Plan template does not provide information regarding the City’s current racial and ethnic composition. This information is essential to the evaluation of disproportional needs by racial or ethnic groups in the City. The data below is provided by the U.S. Census Bureau (2013-2017 American Community Survey):

<u>Race</u>	<u>Total</u>	<u>Percentage</u>
White	53,065	81.4%
Black or African American	438	0.7%
American Indian and Alaska Native	129	0.2%
Asian alone	2,441	3.7%
Native Hawaiian and Other Pacific Islander	501	0.8%
Some other race	5,496	8.4%
Two or more races	3,156	4.8%
Total	65,226	100%

<u>Ethnicity</u>	<u>Total</u>	<u>Percentage</u>
Non-Hispanic or Latino	53561	82.1%
Hispanic or Latino	11665	17.9%
Total	65,226	100%

Discussion:

HUD's definition of disproportionately greater need is provided above. The HUD data from Table 21 indicates that regardless of race or ethnicity, most extremely low-income San Clemente residents have a housing cost burden. Within the other income categories, Pacific Islanders and American Indian/Alaska Natives are disproportionately impacted by housing cost; however, combined these racial cohorts comprise approximately 1% of the City's population.

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

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

According to Census data, Hispanics/Latinos are the largest race or ethnic minority group in San Clemente (17.9% of the City's population). Asians comprise the second largest minority population – 3.7% of the City's population. Based on HUD data from the above series of tables, Hispanics/Latinos and Asian households consistently appear to be experiencing housing problems disproportionately to the community as a whole.

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

As previously outlined, housing cost is a prevalent housing problem in San Clemente. This housing problem can be found among all income categories and race/ethnic groups. Based on HUD data and City staff input, crowded and substandard housing are not a significant issue in San Clemente.

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

In general, minority populations are not concentrated in specific areas of the City. There are three Census Tracts with higher concentrations of Hispanic residents and three Census Tracts with a high concentration of Asian residents - relative to their respective percentages of the City's entire population (see **Attachment 3 - Map A and B**):

<u>Census Tract Number</u>	<u>Percent Hispanics/Latinos</u>
0421.07	50.8%
0421.08	32.9%
0421.14	21.56
Citywide	17.9%

<u>Census Tract Number</u>	<u>Percent Asians</u>
0421.09	11.3%
0421.12	10.5%
0422.05 *	6.6%
Citywide	3.7%

* Shared Census Tract with the City of San Juan Capistrano

NA-35 Public Housing – 91.205(b)

Introduction

The City of San Clemente does not operate a public housing authority. The City partners with OCHA. The information provided in the tables below is for all Orange County communities served by OCHA. "Updated Information" is specifically for San Clemente. This information was provided by OCHA.

The number of vouchers administered by a housing authority fluctuates due to the availability of new vouchers from HUD and changes in housing costs. As of November 2019, OCHA manages 11,091 rental assistance vouchers throughout Orange County - 151 vouchers are leased in San Clemente.

Totals in Use

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

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

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

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for San Clemente households receiving rental assistance from OCHA as of November 2019.

Average Annual Income	\$17,507
Average length of stay	NA
Average Household size	1.4
# Homeless at admission	13
# of Elderly Program Participants (>62)	103
# of Disabled Families	78
# of Families requesting accessibility features	NA
# of HIV/AIDS program participants	NA
# of DV victims	NA

Race of Residents

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

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

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for San Clemente households receiving rental assistance from OCHA as of November 2019.

White	138
Black/African American	4
Asian	6
American Indian/Alaska Native	1
Pacific Islander	1
Other	1

Ethnicity of Residents

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

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

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

UPDATED INFORMATION

Demographic information for San Clemente households receiving rental assistance from OCHA as of November 2019.

Hispanic	26
Not Hispanic	125

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

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

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	41	18				
Persons in Households with Only Children						
Persons in Households with Only Adults	8	78				
Chronically Homeless Individuals						
Chronically Homeless Families						
Veterans						
Unaccompanied Child						
Persons with HIV						

Table 26 - Homeless Needs Assessment

Data Source Comments: 2019 Orange County Point In Time Survey

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

The OC-CoC conducted a Point-In-Time Survey of Orange County’s homeless as part of a national survey. The January 2019 PITS estimated the County’s homeless population at 6,860 individuals, with 763 in the South County SPA, including 145 homeless in San Clemente. Orange County’s homeless count indicates that Countywide, there 2,899 homeless residing in emergency or transitional housing - 3,961 homeless are unsheltered. In the South SPA, there are 255 sheltered homeless and 538 unsheltered. San Clemente’s homeless are enumerated as 59 sheltered and 86 unsheltered homeless.

To the extent that the PITS captured demographic data regarding the City’s homeless, information by homeless category is provided below. If no specific San Clemente data is available, an estimate based on countywide or SPA homeless demographics is provided.

- Chronic Homeless Individuals: A chronically homeless individual is defined by HUD as an unaccompanied homeless individual (living in an emergency shelter or is unsheltered) with a disabling condition, who has been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years. The 2019 PITS estimates there are 37 sheltered and 216 unsheltered chronically homeless in South County SPA – approximately 33.2% of the subregion’s homeless population. Based on this percentage, it is estimated that 48 of San Clemente’s homeless may be chronically homeless. Since the PITS estimates that 85.4% of the chronic homeless in the South SPA are unsheltered; therefore, it is further estimated that there are 41 chronically homeless in the City.
- Chronically Homeless Families and Families with Children: The 2019 PITS identifies 59 persons in “families” in San Clemente - 41 individuals are sheltered, and 18 are unsheltered. No data regarding chronically homeless families are provided by the PITS; however, among unsheltered homeless individuals, approximately one-third report they become homeless for the first time in the past 12 months.
- Veterans and their Families: The County’s 2019 PITS found six unsheltered homeless veterans among San Clemente’s homeless.
- Unaccompanied Youth: The 2019 PITS did not estimate “unaccompanied children” (as requested in Table 26); however, the homeless survey did estimate the number of youth households, i.e., adults between the ages of 18 and 24 – Transitional Age Youth. The 2019 PITS identified nine unsheltered homeless transitional youth in the City.
- HIV/AIDS: The 2019 PITS estimated that 0.8% of homeless adults in the South SPA are living with HIV/AIDS. Based on this percentage, it is presumed there is one homeless individual with HIV/AIDS in the City.

Nature and Extent of Homelessness: (Optional)

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

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

OCHA provided the City with information regarding San Clemente households that submitted applications for rental assistance in 2012, the last time OCHA accepted applications. After a recent purge of applications, OCHA reports there are 62 San Clemente households on the waitlist for housing assistance. Of this number, 26 are households with children, 18 are identified as senior households (age 62 and older), and 17 applicants indicate they are disabled. Because homeless veterans are provided a priority for rental housing assistance, OCHA staff indicates there are no veteran households on the waitlist. OCHA estimates it will take approximately three years to work through the waitlist.

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

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

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2019 Orange County homeless survey reports there are 49 sheltered and 96 unsheltered homeless in San Clemente.

Discussion:

The 2019 Point-In-Time Survey of Orange County’s homeless estimates there are 145 homeless in San Clemente – 49 are sheltered, and 96 are unsheltered. To a large extent, the characteristics of the homeless in San Clemente mirror those of the County’s South SPA homeless population, as reported in the 2019 homeless survey.

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

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

Introduction:

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

Describe the characteristics of special needs populations in your community:

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

- Elderly/Frail Elderly: According to the U.S. Census Bureau, 16.3% of San Clemente residents are age 65 and over (2013-2017 ACS). This population is often impacted by limited mobility, increased health complications, and fixed income. Common service needs for the elderly include transportation and in-home services. As detailed in HUD's housing needs tables (Tables 9 and 10), 1,930 lower-income elderly households are experiencing housing cost burden – 1,400 are experiencing severe housing cost burden. As of November 2019, OCHA provides housing assistance to 103 senior households - 18 senior San Clemente households are on OCHA's housing assistance waitlist.
- Persons with Disabilities: According to the 2013-2017 ACS, approximately 7.2% of San Clemente's population has one or more disabilities. Federal laws define a person with a disability as "Any person who has a physical or mental impairment that substantially limits one or more major life activities..." Examples of disabilities include hearing, mobility, and visual impairments, chronic alcoholism, and mental illness. As of November 2019, OCHA provides housing assistance to 78 disabled households - 17 disabled San Clemente households are presently on the housing assistance waitlist.
- Victims of Domestic Violence: Domestic violence is displayed in many forms; intimidation, physical assault, sexual assault, and other abusive behavior that is part of a pattern of control by a partner against another. Nationwide it is estimated that one in three women and one in seven men experience some form of domestic violence by an intimate partner. The California Department of Justice reports that in 2018, 160 domestic violence calls for assistance were reported in San Clemente. For these individuals, temporary safe housing is vital. The 2019 PITS estimates that in the South SPA, 11.3% of homeless adults are victims of domestic violence - 75% are unsheltered.
- Persons with HIV/AIDS: The Orange County Health Care Agency reports that as of December 31, 2018, 81 San Clemente residents are living with HIV. Persons with HIV/AIDS face a variety of challenges, including maintaining stable housing. Safe, affordable housing may be as crucial to their general health as is access to healthcare. The 2019 PITS estimates that in the South SPA, six

homeless adults have HIV/AIDS – five are unsheltered. Persons with HIV/AIDS may be targets of discrimination, including illegal eviction from their homes when their illness is exposed. Fair Housing laws prohibit housing discrimination against persons with disabilities, including persons with HIV/AIDS.

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

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

The Orange County Health Care Agency reports that as of December 2018, 6,369 persons were living with HIV in Orange County – 81 in San Clemente. Demographic data regarding the characteristics of the County’s “People Living with HIV Disease (PLWHD)” include the following:

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

There is no HIV/AIDS-dedicated housing in 81 in San Clemente; however, the AIDS Services Foundation has a motel program that will allow those with HIV/AIDS facing homelessness to stay in motels throughout the region for a limited time. The following HIV/AIDS housing resources are available to residents on a countywide basis:

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

Discussion:

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

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

Describe the jurisdiction’s need for Public Facilities:

Overall, the City's public facilities are in good condition; however, upgrading of aged or deteriorating improvements may be necessary. 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. These and other public improvements may be addressed with CDBG funds.

How were these needs determined?

Public facility needs were determined via public input (i.e., community meeting) and consultation with City staff.

Describe the jurisdiction’s need for Public Improvements:

Some of San Clemente’s original neighborhoods represent some of Orange County’s oldest communities. The public infrastructure within these areas requires upgrading. Planned improvements to be considered for CDBG funding during the next five years will generally include the following:

- Street Improvements: reconstruction of street pavement, streetscape improvements, medians, and replacement or installation of sidewalks
- ADA Improvements: curb, sidewalk, and curb ramp improvements to comply with ADA regulations
- Other eligible public infrastructure improvements

How were these needs determined?

Public infrastructure needs were determined via public input (i.e., community meetings) and consultation with City staff.

Describe the jurisdiction’s need for Public Services:

Numerous public, social, and faith-based agencies serve San Clemente’s residents. These organizations address social, health, and education needs of residents. The demand for public and social services typically exceeds available resources, especially for social safety net services.

How were these needs determined?

Public service needs were determined via the public input process, i.e., community meetings, consultation with local service providers, and the City’s Human Services Committee.

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. In conjunction with the Needs Assessment, the Market Analysis provides the basis for the Strategic Plan and the programs and projects to be undertaken with HUD resources. Most of the data tables in this section are populated by default with data from the Comprehensive Housing Affordability Strategy (CHAS), a special tabulation housing data produced by the Census Bureau for HUD. Additional data is derived from the American Community Survey (ACS) and other current data sources. The Market Analysis will also examine barriers to affordable housing, including impediments to fair housing choice.

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

Introduction

HUD defines a housing unit as a house, an apartment, or a single room, occupied as a separate living quarter, or if vacant, intended for occupancy as a separate living quarter. This section of the Consolidated Plan addresses the housing characteristics of the housing supply in San Clemente, including type, tenure, age, condition, costs, affordability, and availability.

Based on data from Table 26, the majority of San Clemente’s housing stock is comprised of one-unit structures (approximately 70%). Data from the State of California indicates that as of January 1, 2019, the City has a total of 26,415 housing units. Consistent with HUD’s data, the State estimates approximately 67% of the City’s housing stock is constructed as single attached or detached units. According to Table 27, 65.2% of the City’s housing units are occupied by owners, and 34.8% by renters.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	15,795	59%
1-unit, attached structure	3,025	11%
2-4 units	3,795	14%
5-19 units	2,575	10%
20 or more units	1,375	5%
Mobile Home, boat, RV, van, etc	395	1%
Total	26,960	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0%	495	6%
1 bedroom	140	1%	2,035	24%
2 bedrooms	2,725	17%	3,620	43%
3 or more bedrooms	12,820	82%	2,220	27%
Total	15,695	100%	8,370	100%

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

According to the City's Housing Element, there are 492 affordable housing units in nine different housing project developments in San Clemente (**Attachment 4**). Two hundred seventy of these units are for lower-income seniors, and the balance is for lower-income families.

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

One affordable housing projects listed in **Attachment 4** is at risk of converting to market-rate housing in 2025.

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 primary purpose 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; they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period. The distribution of housing needs by income category for each jurisdiction is adjusted to avoid an overconcentration of lower-income households in any community. For the current planning period (2014 through 2021), the City's RHNA allocation is 581 new housing units.

According to an article in the *Orange County Register*, "California needs between 1.8 million and 3.5 million new homes by 2025... To get there, cities and counties would have to approve two to four times the number of homes they've been permitting in the past few years. But instead of approving more homes, almost every California city and county is falling behind its state-mandated housing goal..." ("California needs more housing, but 97% of cities and counties are failing to issue enough RHNA permits." Published December 9, 2019, *Orange County Register*.) According to this article, San Clemente has performed above average in permitting the development of housing units to meet RHNA goals for very low- and above moderate-income households, but is below average permitting housing units affordable to low-income and moderate-income households. State and SCAG planners are in the process of establishing RHNA goals for jurisdictions for the next planning cycle. These goals are yet to be finalized. Once goals are established, the City will take necessary action to comply with applicable State regulations.

HUD data from Table 9 estimates that 6,310 lower-income San Clemente households are experiencing housing cost burden. Based on the current supply of housing units, there appears to be a gap of housing units affordable to many residents, especially lower-lower income households.

Describe the need for specific types of housing:

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

Discussion

The City’s housing stock is comprised primarily of single-unit structures. State and regional planners have established goals for all jurisdictions to create an environment to allow for the development of new housing that is affordable to different income levels.

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

Introduction

It is reported the median home sales price in Orange County in December 2019 was \$840,000 – the second highest on record. (“Buyer competition fuels 16% jump in Southern California house sales.” *Orange County Register*, published January 17, 2020.) The rise in home sales prices has been driven by low interest rates and a limited supply of available housing units. According to Zillow.com, in January 2020, the median home sales price in San Clemente was \$975,530, a 28.6% increase from the 2015 median value listed in Table 28. With respect to rents, Zillow reports the median San Clemente list rent in January 2020 was \$3,600.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	862,900	758,300	(12%)
Median Contract Rent	1,393	1,634	17%

Table 29 – Cost of Housing

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

Rent Paid	Number	%
Less than \$500	400	4.8%
\$500-999	700	8.4%
\$1,000-1,499	2,545	30.4%
\$1,500-1,999	2,520	30.1%
\$2,000 or more	2,195	26.2%
Total	8,360	99.9%

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	255	No Data
50% HAMFI	525	105
80% HAMFI	3,265	254
100% HAMFI	No Data	494
Total	4,045	853

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

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

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

Based on HUD data tables above, it appears there is a limited supply of housing units affordable to lower-income households. With a median home price of \$975,530 and a current median list rent of \$3,600, it is evident there is an insufficient supply of affordable housing for households at most income levels. The *2019-20 Community Indicators*, produced by the Orange County Business Council, indicates a minimum annual income of \$110,160 is needed to afford an entry-level home in Orange County (estimated at \$680,000). This income requirement exceeds the average annual income of many occupations, such as retail sales clerks, secretaries, computer programmers, elementary school teachers, and nurses. The *2019-20 Community Indicators* also finds that “To afford a median-prices one-bedroom apartment in 2019, an Orange County resident would need to make \$31.38 per hour – equivalent to an annual income of \$66,310... A minimum wage worker in Orange County would have to work 105 hours a week to afford a one-bedroom apartment, 131 hours to afford a two-bedroom unit, and 183 hours to afford a three-bedroom.” (*2019-20 Orange County Community Indicators*, page 54-58.)

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

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

Despite economic disruptions caused by the COVID-19 pandemic, the affordability of Orange County’s housing market will most likely remain out of reach of many lower-income households.

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 current rent limits for the program are listed in Table 31. Based on a comparison of these rent levels to rents listed on certain on-line housing services, it is evident that significant subsidies or other concessions would be necessary to create units that are affordable to lower-income households.

Discussion

Orange County remains one of the nation’s most expensive housing markets. Data indicates that median home sales prices and monthly rents are out of reach of many lower-income and moderate-income households. Despite economic disruptions caused by the COVID-19 pandemic, market trends indicate some housing opportunities will most likely remain out of reach of many of the region’s residents. The State of California has taken legislative action to address a growing affordable housing shortage; however, the future impacts of this legislation are unknown.

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

- Substandard Condition: 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 “substandard” are defined in Section 17920.3 of the California Health and Safety Code.
- Substandard Condition but suitable for Rehabilitation: 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.
- Housing Problems: As defined by HUD:
 1. Lack of complete kitchen facilities or lack of complete plumbing facilities
 2. More than one person per room
 3. Cost burden greater than 30%

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,505	35%	4,460	53%
With two selected Conditions	80	1%	570	7%
With three selected Conditions	0	0%	20	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	10,115	64%	3,315	40%
Total	15,700	100%	8,365	100%

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	4,395	28%	810	10%
1980-1999	5,265	34%	2,155	26%
1950-1979	5,660	36%	4,920	59%
Before 1950	375	2%	480	6%
Total	15,695	100%	8,365	101%

Table 34 – Year Unit Built

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	6,035	38%	5,400	65%
Housing Units build before 1980 with children present	1,915	12%	1,405	17%

Table 35 – Risk of Lead-Based Paint

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

Vacant Units

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

Table 36 - Vacant Units

UPDATED INFORMATION:

There is limited data source regarding vacant units and bank-owned (REO) properties within the City. Based on data from the State of California Department of Labor, as of January 1, 2019, the City's housing vacancy rate is 8.2%. According to RealtyTrac, in December 2019, 35 properties in San Clemente were in some stage of foreclosure (default, auction, or bank-owned).

Need for Owner and Rental Rehabilitation

Based on data from Table 33, approximately 38% of San Clemente's owner housing stock was built before 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 spending 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 repairs on their older properties.

Table 33 also indicates that approximately 65% of the City's rental housing stock was built before 1980. As noted 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 34 indicates there are an estimated 11,435 housing units in San Clemente that were constructed before 1979, with 3,320 of these homes having children present.

The State of California and the County of Orange Department of Public Health report that in 2018, 1.02% of 32,426 children under age six that were screened for blood lead levels (BLL), had a BLL over 4.5 micrograms of per deciliter ($\mu\text{g}/\text{dL}$). 4.5 $\mu\text{g}/\text{d}$ is the BLL level the Center for Disease Control and Prevention (CDC) considers “high.” This data is not specific to lead-based paint. Nonetheless, the data indicate that high blood lead among the County’s young children is not a significant issue. Regardless, the City will take proactive action to educate parents of the developmental problems to young children associated with lead.

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 substantial maintenance and even extensive rehabilitation (e.g., replacement roofs and re-plumbing). Additionally, many residences were constructed before 1978 and thus may have lead-based paint. San Clemente has established a housing rehabilitation program to assist lower-income homeowners to improve 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.

Totals Number of Units

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

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

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

Not applicable

Public Housing Condition

Public Housing Development	Average Inspection Score
NA	NA

Table 38 - Public Housing Condition

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

Not applicable

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

Not applicable

Discussion:

There are no public housing units in San Clemente.

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

Introduction

As previously discussed, the OC-CoC conducts a biennial point in time count of the County’s homeless population and an inventory of shelter beds. Information presented in Table 38 identifies homeless shelter beds in San Clemente.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	44		14		
Households with Only Adults *				35	
Chronically Homeless Households					
Veterans					
Unaccompanied Youth					

Table 39 - Facilities and Housing Targeted to Homeless Households

*These are “Scattered-site units” – some units may be located in communities other than 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 for the homeless; however, it does fund nonprofit agencies that provide housing and support services for the homeless in San Clemente. 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 include veterans housing vouchers, veteran medical services, MediCal/Medicare, SSI, and TANF.

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 38, there are 44 emergency and 14 transitional housing beds in the City of San Clemente. These shelter beds are targeted to homeless families with children. The OC-CoC also reports there are 35 permanent supportive housing beds for chronic homeless individuals in the City; however, these units are identified as scatter-site, so it is likely all beds are not located in San Clemente but throughout the South SPA. It is also 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 in Table 38.

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

Introduction

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

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 – Southern California, it has been determined that there are 256 residential care beds in 22 facilities in San Clemente. The bulk of these facilities are six-bed facilities operating in residential neighborhoods - there is one facility in the City with 131 beds. Additionally, there are 270 subsidized senior housing units in the City.
- Group Homes/Quarters: The State reports that as of January 2019, there are 273 San Clemente residents living in group housing. Examples of group quarters included homes for the mentally disabled and physically disabled, seniors, and those recovering from substance addiction. In recent years some recovery homes have had negative impacts on residential neighborhoods. Due to current federal and state regulations, the City's ability to take specific enforcement action is limited; nonetheless, the City continues to seek avenues to address and mitigate some of the neighborhood impacts caused by problematic operators.
- HIV/AIDS Housing: As previously outlined, there are no shelters or permanent housing units for persons with HIV/AIDS in San Clemente.
- Public Housing Residents: There is no public housing in San Clemente. As of November 2019, a total of 151 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 will include the County's discharge plan. The discharge plan will help ensure individuals leaving institutional or medical facilities do not exit directly into homelessness. The plan will outline protocols for discharge from public facilities (such as jails) and public systems (such as the foster care system). The plan will also establish protocols to identify and assess those at-risk of homelessness and link them to needed services. Additionally, most homeless service providers involved with shelter operations are required to develop a management plan and protocols to ensure clients of respective programs receive appropriate housing and services at discharge. Furthermore, the regional CoC Coordinated Entry System will help assess the vulnerability of persons leaving institutions and link the neediest with appropriate housing and support services.

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

The City will continue to support various organizations that provide services to persons that have special needs. Not all programs listed have received or will receive financial assistance from the City.

- RIO Adult Day Health Care Center: 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, aides, activities, and administrative personnel
- St. Clement's-By-The-Sea Episcopal Church: Summer food service program for low-income families
- CUSD Family Resource Center & Learning Links Program: A variety of services for families with children under five years old
- South County Outreach: Services include food, rental assistance, and job search. Transitional apartments are available to qualified applicants – including San Clemente residents
- Camino Health Services and Dental Clinic: Low-cost primary and general medical services available to low-income and indigent San Clemente residents
- Family Assistance Ministries: Services include food and rent and utility assistance. A continuum of shelter and housing for homeless families with children is also available to San Clemente residents

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 on 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., the California Environmental Quality Act and the National Environmental Policy Act) require an environmental review of projects and programs. 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 establishes the location and amount of land that will be allocated to residential development, and also establishes the intensity of development (in terms of unit densities and a total number of units). 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 40 (derived from the 2011-2015 ACS), San Clemente has a workforce of 30,965 individuals and an unemployment rate of 6.04%. Recent data from the California Employment Development Department show that in April 2018, the unemployment rate had decreased to 2.8%. This rate was lower than the 2.8% unemployment rate recorded for all of Orange County, and the 4.7% unemployment rate for California for the same period. The economic impacts of the COVID-19 pandemic are unknown.

Economic Development Market Analysis

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	200	16	1	0	-1
Arts, Entertainment, Accommodations	3,533	3,136	15	17	2
Construction	1,433	2,909	6	16	9
Education and Health Care Services	3,407	2,546	15	14	-1
Finance, Insurance, and Real Estate	2,027	882	9	5	-4
Information	709	184	3	1	-2
Manufacturing	1,853	1,760	8	9	1
Other Services	902	839	4	4	1
Professional, Scientific, Management Services	3,124	2,231	13	12	-1
Public Administration	0	0	0	0	0
Retail Trade	2,578	1,923	11	10	-1
Transportation and Warehousing	528	64	2	0	-2
Wholesale Trade	1,594	1,500	7	8	1
Total	21,888	17,990	--	--	--

Table 40 - Business Activity

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

Labor Force

Total Population in the Civilian Labor Force	32,950
Civilian Employed Population 16 years and over	30,965
Unemployment Rate	6.04
Unemployment Rate for Ages 16-24	14.97
Unemployment Rate for Ages 25-65	4.02

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	10,800
Farming, fisheries and forestry occupations	1,140
Service	2,600
Sales and office	8,440
Construction, extraction, maintenance and repair	1,760
Production, transportation and material moving	555

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	14,525	53%
30-59 Minutes	9,360	34%
60 or More Minutes	3,370	12%
Total	27,255	100%

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,130	34	580
High school graduate (includes equivalency)	2,785	115	865
Some college or Associate's degree	8,360	720	2,880
Bachelor's degree or higher	13,385	530	2,880

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	4	165	170	410	145
9th to 12th grade, no diploma	830	225	275	500	205
High school graduate, GED, or alternative	1,735	735	1,085	2,070	1,495
Some college, no degree	1,630	1,195	1,665	5,765	2,850
Associate's degree	330	700	855	1,880	880
Bachelor's degree	530	2,390	3,660	5,685	2,125
Graduate or professional degree	45	735	1,385	3,115	1,945

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,430
High school graduate (includes equivalency)	82,215
Some college or Associate's degree	93,411
Bachelor's degree	159,233
Graduate or professional degree	200,991

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

According to Table 39, four major business activity sectors account for 54% of total “workers” and 53% of total “jobs.”

- Arts, Entertainment, Accommodations: 15% of Workers and 17% of Jobs
- Education and Health Care Services: 15% of Workers and 14% of Jobs
- Professional, Scientific, Management Services: 13% of Workers and 12% of Jobs
- Retail: 11% of Workers and 10% of Jobs

This data corresponds with a list of the City’s top five employers:

- Capistrano Unified School District
- Glaukos Corporation (medical technology and pharmaceutical)
- The Fisherman’s Restaurants
- Ralphs
- ICU Medical

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 prominence in education/health care, 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.

The City has established a *Business Liaison/Facilitator Program* as a means to provide 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 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 may have an impact on job growth within the community. In 2016, Saddleback Memorial Medical Center in San Clemente closed. Approximately 100 full-time and part-time jobs (primarily health care service jobs) were lost. An outpatient medical campus is proposed to replace the hospital, which may replace some lost employment opportunities; however, the future of the project is unclear. In November 2015, phase one of a 500,000 square foot outlet shopping center open. It is projected that the project will generate significant annual sales tax revenue for the City and will create hundreds of jobs - many of which will be available to teens and young adults. Phase two of the project includes a hotel and conference center with additional retail and restaurant space. Construction of a multi-screen movie theater is currently under construction. 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 Orange County Business Council *2020 Orange County Workforce Indicators Report* provides a detailed overview of the region's economy. The report identifies economic changes caused by new technologies and how new technology is transforming the workforce, economy, and overall business climate of Orange County. Of all the trends that may impact the workplace, the report indicates, "Artificial Intelligence (AI) has the greatest transformative potential." Furthermore, "While new technologies will likely create more jobs than it replaces in the long term, the labor market may face disruptions and widening skills gaps in the short term.... **Soft skills** will be the key to navigate this transformative period." The report loosely defines soft skills as the ability to work well in a group and demonstrate the "kind of creativity exhibited by writers and painters." Effective leadership, communication, and time management are critical soft skills. According to the Business Council report, "These skill ... will likely prove to be some of the most defensible skills in an era of increasing automation ... they will survive long after many technical skills become obsolete."

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

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

According to the 2020 Orange County Business Council's *Workforce Indicators Report*, community colleges are playing a critical role in helping Orange County businesses expand. "Community colleges are able to adapt to the needs of a rapidly changing labor market much more quickly than their four-year counterparts, making them essential to many cutting-edge industries." Furthermore, Orange County's community colleges provide students with resources and knowledge to learn skills specifically tailored for certain careers allowing them to find jobs they are already familiar with, thus reducing the likelihood of unemployment or underemployment. Examples of "Career Education" programs offered at local colleges include Information and Communication Technology, Process Technology, Energy Efficiency and Renewables, and Science and Medical Technology. The County's universities will continue at the vanguard of research and innovation, which fuels the region's economy.

The City's 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.

MA-50 Needs and Market Analysis Discussion

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

Based on data from the Housing Needs Assessment, it has been determined housing cost burden and severe housing cost burden are the most prevalent housing problem in San Clemente. Based on an evaluation of HUD data, it has been determined that in two Census Tracts, the majority of residents have a housing cost burden.

- 0421.07: 55.3% of residents have a housing cost burden
- 0422.06: 50.5% of residents have a housing cost burden (this Census Tract is shared with the adjacent jurisdiction)

Six Tracts have cost burden percentages ranging from 40.2% to 49.9% (see **Attachment 3 - Map C**).

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

For this discussion, a concentration of racial or ethnic minorities is defined as a Census Tract where the percentage of members of a racial or ethnic group is at least 10% points greater than the citywide percentage.

As detailed in the Housing Needs Assessment, Asians and Hispanics comprise the community's largest minority populations – 3.7% and 17.9%, respectively.

- Asians: Per HUD's CPDMaps program, the City's Asian population lives throughout the community and appears to be experiencing housing cost burden to the same degree as residents of other races.
- Hispanics: Census Tract 0421.07 has the largest concentration of Hispanics/Latino residents (50.8%) and the highest concentration of residents experiencing housing cost burden (55.3%).

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

The Census Tract with Hispanic/Latino concentration is within the City's CDBG-eligible area. This Tract is 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. Neighborhoods in the Tract are among 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 area mentioned above. Maxx Berg Park is the neighborhood focal point - the location of many community and neighborhood events. Adjacent to the park is Las

Palmas Elementary School. This school 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?

Census Tract 0421.07 is in the older section of San Clemente. The area is built out and has limited development opportunities; however, there may be opportunities to rehabilitate existing structures. Additionally, this area has been identified for the installation of public improvements such installation of sidewalks.

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

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

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

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

BroadbandNow reports that 96.5% of Californians have access to wired broadband service. BroadbandNow further reports that 99.0% of Orange County residents have access to broadband internet service, and specifically, 99.3% of San Clemente residents have broadband service. BroadbandNow reports there are three residential broadband providers offering service in San Clemente. The average San Clemente household has at least three internet companies available to them; however, 6,000 residents have access to one or fewer wired internet providers.

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

The Alliance for Affordable Internet (A4AI) is an international organization that "brings together businesses, governments, and civil society actors from across the globe to develop policies needed to reduce the cost to connect and make universal, affordable internet access a reality." Research published A4AI finds that consolidated broadband markets, i.e., markets with a single broadband provider - are keeping prices high and putting life-changing internet access out of reach for hundreds of millions of people. While A4AI analyzes broadband service on a global scale, its research applies to the local market. A4AI research shows competition in the broadband market can save users up to \$3.42 per GB. With three companies providing wired broadband in the City, BroadbandNow estimates that the average San Clemente household pays \$0.54 per Mbps (megabytes per second). Comparatively, with 24 broadband providers to choose from, Houston residents pay an average of \$0.24 per Mbps.

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

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

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

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

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

The City's current General Plan includes a Safety Element, which contains an assessment of certain natural hazards such as flooding and marine hazards and wildfires.

- Flooding and Marine Hazards: Potential water-related hazards in San Clemente include flooding, tsunami, and sea level rise. Distant source tsunamis have produced run-up of less than two feet in San Clemente; however, global climate changes affecting sea levels have been observed over time, and if observed patterns continue, a sea level rise should be expected. Sea level rise is a long-range concern. A significant increase in sea level rise could adversely affect land use, transportation, and water quality in low-lying coastal areas. Portions of the City are in a 100-year flood zone.
- Wildland Fires: Several neighborhoods in San Clemente are adjacent to expansive open space resources, such as the O'Neill Conservancy, San Onofre State Beach, and Camp Pendleton. These large open space areas contain vegetation that provides fuel for wildfires, which can threaten life and property in San Clemente. Vegetation and native plants are highly combustible, especially during the summer months or droughts. Wildfires are of concern during Santa Ana wind events when winds blow dry air from the east to the west. They create extremely dry conditions in which fires can quickly develop due to natural or human causes.

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

The Safety Element includes a public safety plan that aims to protect the life and property of all City residents regardless of household income. The City has developed the following policies to address the hazards listed above.

- Prohibit development within the 100-year flood zone unless adequate mitigation is provided against flood hazards.
- Coordinate appropriate response procedures for police, fire, and other agencies to respond during flooding. Procedures should be consistent with Federal, State, and County regulations, as well as the City of San Clemente Emergency Plan.
- Coordinate with the Orange County Fire Authority to provide public education tools to increase awareness of fire prevention measures.
- Implement measures that balance the need for fire safety and defensible landscape perimeters with biological and open space preservation, consistent with the City's Coastal Conservation Plan.
- Prepare a Sea Level Rise Vulnerability Assessment to identify areas and resources in the City that may be vulnerable to rising seas, so the City may begin to consider ways to improve and enhance coastal resiliency for the long-term.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

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

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

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

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

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

Geographic Area

Table 47 - Geographic Priority Areas

1	Area Name:	CDBG Census Tracts
	Area Type:	Local Target area
	Other Target Area Description:	Low- and Moderate- Area
	HUD Approval Date:	4/1/19
	% of Low/ Mod:	33.84%
2	Area Name:	Citywide
	Area Type:	Citywide program or activity
	Other Target Area Description:	Citywide

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 2020-2024, the City utilized a **priority ranking** system:

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

CDBG funds will be allocated on a citywide basis for activities that primarily benefit qualified low- and moderate-income households (i.e., limited-clientele activities). Other activities such as public improvements will be limited to CDBG Target areas (see **Attachment 4 - Map D**), except for ADA related improvements, which may be carried out on a much broader basis.

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

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

Priority Needs

Table 48 – Priority Needs Summary

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

	Population	Extremely Low Low Moderate Other – Presumed beneficiaries
	Geographic Areas Affected	Citywide
	Associated Goals	Public Social Services
	Description	Social service programs that provide services to low- and moderate-income residents
	Basis for Relative Priority	Needs Assessment, service providers input, and public input
4	Priority Need Name	Homeless Support Services and Housing
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children
	Geographic Areas Affected	Citywide
	Associated Goals	Homeless Continuum of Care
	Description	A continuum of housing and support services for persons at risk of homelessness and the homeless
	Basis for Relative Priority	Needs Assessment, service providers input, and public input
5	Priority Need Name	Economic Opportunities
	Priority Level	High
	Population	Moderate
	Geographic Areas Affected	CDBG Eligible Area
	Associated Goals	Economic opportunities for low- and moderate-income residents
	Description	Grants and other forms of assistance to improve or expand for local businesses
	Basis for Relative Priority	Needs Assessment and public input

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

Narrative (Optional)

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

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

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	This type of activity is typically not CDBG-eligible
TBRA for Non-Homeless Special Needs	This type of activity is typically not CDBG-eligible
New Unit Production	CDBG cannot be used for this type of activity; however, funds can be used for certain pre-development costs or off-site public improvements. The Needs Assessment and the Housing Market Analysis indicate there is a shortage of housing units affordable to lower-income households; however, due to the size of the City’s annual CDBG allocation, it is unlikely funds will be used for this purpose. A substantial amendment to the Consolidated Plan may be necessary if future funding is allocated for this type of activity.
Rehabilitation	Housing Market analysis data indicates many lower-income homeowners are dedicating a significant amount of their income for housing (housing cost burden). Housing rehabilitation assistance allows homeowners to address deferred property improvements on their primary residence without increasing the amount of household income dedicated to housing. If resources are available, rental housing rehabilitation assistance may be provided.
Acquisition, including preservation	The Housing Market Analysis data indicates that there is a need for additional housing that is affordable to both lower-income renter and owner households. The City’s annual allocation of CDBG funds presents a challenge to reduce project costs significantly.

Table 49 – Influence of Market Conditions

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

Introduction

Fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the five-year Consolidated Plan cycle. 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 In-lieu Affordable Housing Fund 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.

The City anticipates it will receive an annual allocation in the range of \$300,000 in CDBG funds from HUD during the five-year Consolidated Plan cycle. Additionally, the City will receive program income that is generated by the repayment of prior CDBG-funded housing rehabilitation loans. The City also anticipates that the County of Orange will continue to administer the federal rental assistance program in San Clemente, assisting approximately 150 households per year.

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	356,108	0	173,583	529,691	1,200,000	Annual HUD CDBG allocation, program income and prior year funds

Table 50 - Anticipated Resources

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

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. 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 November 2019, 151 San Clement households receive rental assistance. It is anticipated that 150 households will be assisted annually over the five years of the Consolidated Plan programming cycle.
- 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 in purchasing land or existing housing units for the provision of long-term affordable housing. The IHP was adopted by the City in 1980 to increase the supply of affordable housing. 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. Recent housing development activity 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” with limited vacant and underutilized properties suitable for housing development. The Housing Element contains information regarding various sites that could be utilized to address future housing needs. Based on the unit capacity of these properties, an estimated 634 could be developed at multiple locations. Nearly all vacant residential sites in the City are small, infill parcels located west of Interstate 5. Additionally, most of the 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 fluctuate. In recent years, CDBG housing rehabilitation loan repayments have provided the City with additional funding; however, this source is also susceptible to the fluctuations of the economy and thus unpredictable. HUD is providing additional 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. For the foreseeable future, the City will continue to support local 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 are available for nonprofits to purchase land or existing units, and an inventory of vacant and underutilized land suitable for development is available.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Orange County Housing Authority	PHA	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 Other – Fair Housing	Planning	Jurisdiction
Camino Health Services and Dental Clinic	Non-profit organization	Public service	Regional
South County Outreach	Non-profit organization	Public service	Regional
CUSD Family Resource Center	Other	Public service	Regional
St. Clement's-By-The-Sea Episcopal Church	Non-profit organization	Public service	Jurisdiction
RIO Adult Day Health Care Center	Non-profit organization	Public service	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

San Clemente has a large group of service providers that can deliver 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 50). 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.

Gaps in the institutional delivery system stem from a lack of communication or coordination among service providers resulting in overlaps in service.

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

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

Table 52 - Homeless Prevention Services Summary

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

Service providers are available to assist San Clemente residents that are at risk of becoming homeless and those that are homeless. According to HUD's *Strategies for Preventing Homelessness*, "Homelessness prevention is an essential element of any effort to end homelessness either locally or nationwide." To this end, the City's homeless strategy is to support the provision of safety net services for community residents. These services include case management, supplemental food, financial assistance for rent and utilities, and reduced cost childcare. Safety net services/support enables households at risk of homelessness to redirect limited income toward maintaining their housing.

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

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

The City has access to a network of nonprofit agencies that provide a variety of services for residents, including individuals with special needs. 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 with children, veterans, and youths.

The main weakness in the City's service delivery system stems from limited financial resources, and service and facility gaps in the continuum of care. As previously reported, the 2019 PITS indicates there are 96 unsheltered homeless in San Clemente and 58 shelter beds.

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

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

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure and Facility Improvements	2020	2024	Non-Housing Community Development	CDBG Census Tracts Citywide	Public Improvements	CDBG: \$645,071	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7,000 Persons Assisted
2	Housing Preservation	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$500,000	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	Public Social Services	2020	2024	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$116,700	Public service activities other than Low/Moderate Income Housing Benefit: 12,500 Persons Assisted
4	Homeless Continuum of Care	2020	2024	Homeless	Citywide	Homeless Support Services and Housing	CDBG: 116,700	Public service activities other than Low/Moderate Income Housing Benefit: 1,065 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 10 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								Homeless Person Overnight Shelter: 175 Persons Assisted Homelessness Prevention: 1,250 Persons Assisted
5	Economic Opportunities	2021	2024	Non-Housing Community Development	CDBG Census Tracts	Economic Development	CDBG: \$40,000	Businesses assisted: 10 Businesses Assisted
6	Program Administration	2020	2024	Administration	Citywide	Administration and Planning	CDBG: \$311,220	Other: 305 Other

Table 53 – Goals Summary

Goal Descriptions

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

4	Goal Name	Homeless Continuum of Care
	Goal Description	A continuum of supportive and housing services for the homeless and households at risk of homelessness
5	Goal Name	Economic Opportunities
	Goal Description	Grants and other forms of assistance to improve or expand for local businesses
6	Goal Name	Program Administration
	Goal Description	Provide for administration and planning activities to address needs identified in the Consolidated Plan, including services to address impediments to fair housing

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

The City 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

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

Not applicable

Plan to remove the ‘troubled’ designation

Not applicable

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

Barriers to Affordable Housing

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 on 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., the California Environmental Quality Act and the National Environmental Policy Act) require an environmental review of projects and programs. 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 establishes the location and amount of land that will be allocated to residential development, and also establishes the intensity of development (in terms of unit densities and a total number of units). 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

Affordable Housing Funds: The City will encourage developers to include affordable housing units within 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 Funds 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 a vital role by assisting property owners and developers in navigating 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 time and cost savings development processes, including one-stop permitting, pre-permit application meetings, and concurrent permit application processing. For an 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 that 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 several regional service providers that assist San Clemente residents at risk of becoming homeless and that are homeless. These agencies have established outreach programs that engage the homeless and assess their housing and service needs. Local service providers are tied into the regional Coordinated Entry System established by the OC-CoC, which determines the vulnerability of homeless individuals and prioritizes access to housing and services for those most at risk. This need-assessment system is designed to “facilitate exits from homelessness to stable housing in the most rapid manner given available resources.”

The City will also continue to coordinate closely with the Orange County Sheriff’s Department to ensure homeless persons and persons threatened with homelessness are referred to shelters and social service agencies. Additionally, the City will contract with a local service provider to provide homeless outreach services with the goal of developing relationships with chronically homeless individuals and families and provide them the first steps toward self-sufficiency.

Addressing the emergency and transitional housing needs of homeless persons

As summarized in Table 38, there are 44 emergency shelter and 14 transitional (interim) shelter beds in the City. Shelter beds are earmarked for homeless families with children. Not included in Table 38 are shelter beds for victims of domestic violence.

The City will continue to support programs that shelter and serve the homeless. Additionally, the City will participate in regional efforts to explore options and opportunities to develop a South Orange County SPA year-round shelter and homeless resources center for single adults.

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

According to current HUD directives, the OC-CoC has established a coordinated entry system whereby a homeless individual or family seeking shelter and services is directed to a streamlined system that facilitates access to appropriate housing and services. The system screens applicants for eligibility for services, such as homelessness prevention, emergency shelter, rapid rehousing, permanent supportive housing, and other interventions. The needs and strengths of each household are assessed to determine which interventions will be most effective and appropriate, while also prioritizing people for assistance based on the severity of their needs. Homeless service providers presently supported by the City will be critical players in housing and servicing the City’s homeless population via the coordinated entry system.

The OC-CoC reports there are 35 for permanent supportive housing beds for the chronic homeless in San Clemente. However, OC-CoC indicates that the beds are located in scattered sites; therefore, some of these beds may be in neighboring communities.

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

As indicated previously, the City's homeless strategy is predicated on the notion that homelessness prevention is an essential element of any effort to end homelessness. To this end, the City uses CDBG (and other public) resources to support agencies that provide a variety of safety net services to lower-income households as a means to prevent homelessness. Examples of safety-net services include food banks, rent/utility assistance, and reduced-cost medical services. The City will also participate in regional homeless planning efforts, including the OC CoC's Discharge Plan, which will aim to prevent individuals that are leaving institutions, hospitals, etc., from becoming homeless.

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

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

As required by HUD, the City's Housing Rehabilitation program staff will ensure that all housing units that were built before 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?

National studies estimate that 75% of all residential properties built before 1978 contain lead-based paint (LBP). Based on data from Table 34, an estimated 3,320 housing units, which are occupied by households with children, may contain lead. The State of California and the County of Orange Department of Public Health report that in 2018, 1.02% of 32,426 children under age six that were screened for blood lead levels had high levels. Based on this information, it is reasonable to assume there are a limited number of lead-based paint hazards throughout the community. Nevertheless, the City will ensure information is available to educate residents about lead poisoning at public counters at City Hall, community centers, and on the City's website, and will require lead to be removed from a residence if the unit is rehabilitated with CDBG resources.

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

As indicated above, the City's Housing Rehabilitation Program policies and procedures require that all homes constructed before 1978, which participate in the City's program, must be tested for lead. If lead is found, it must be removed or encapsulated according to HUD regulations.

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, 6.4% of the City’s population lives in poverty. The Census Bureau further reports that 4.3% of San Clemente residents age 65 and older are living in poverty, as do 7.4% 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 OCHA for very low-income renters, especially senior households and households with children
- Support homeless prevention services for the near-homeless and as resources permit, assist those already homeless in need of housing and supportive services
- Support public services that provide a social safety net for lower-income individuals
- Implementation of the City’s Economic Development Strategy to create an environment that is conducive to building and sustaining businesses and employment opportunities, especially for lower-income persons

[1] 2013-2017 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 banks 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 sub-recipients will be required to submit quarterly accomplishment reports to program staff. 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 sub-recipient performance, quality of services, and grant administration abilities. 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.

Quarterly progress reports for public improvement projects will also be required. Reports will include a description of project progress, milestone completion dates, and expenditures. All report information will be entered into IDIS, and the 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.

2020-2021 Annual Action Plan

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

Fluctuations in CDBG funding make it difficult to estimate the amount that will be available over the five-year Consolidated Plan cycle. 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 In-lieu Affordable Housing Fund 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.

The City anticipates it will receive an annual allocation in the range of \$300,000 in CDBG funds from HUD during the five-year Consolidated Plan cycle. Additionally, the City will receive program income that is generated by the repayment of prior CDBG-funded housing rehabilitation loans. The City also anticipates that the County of Orange will continue to administer the federal rental assistance program in San Clemente, assisting approximately 150 households per year.

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	356,108	0	173,583	529,691	1,200,000	Annual HUD CDBG allocation, program income and prior year funds

Table 54 - Anticipated Resources

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

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. 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 November 2019, 151 San Clement households receive rental assistance. It is anticipated that 150 households will be assisted annually over the five years of the Consolidated Plan programming cycle.
- 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 in purchasing land or existing housing units for the provision of long-term affordable housing. The IHP was adopted by the City in 1980 to increase the supply of affordable housing. 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. Recent housing development activity 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” with limited vacant and underutilized properties suitable for housing development. The Housing Element contains information regarding various sites that could be utilized to address future housing needs. Based on the unit capacity of these properties, an estimated 634 could be developed at multiple locations. Nearly all vacant residential sites in the City are small, infill parcels located west of Interstate 5. Additionally, most of the 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 fluctuate. In recent years, CDBG housing rehabilitation loan repayments have provided the City with additional funding; however, this source is also susceptible to the fluctuations of the economy and thus unpredictable. HUD is providing additional 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. For the foreseeable future, the City will continue to support local 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 are available for nonprofits to purchase land or existing units, and an inventory of vacant and underutilized land suitable for development is available.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure and Facility Improvements	2020	2024	Non-Housing Community Development	CDBG Census Tracts Citywide	Public Improvements	CDBG: \$405,091	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,818 Persons Assisted
2	Housing Preservation	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$57,091	Homeowner Housing Rehabilitated: 2 Household Housing Unit
3	Public Social Services	2020	2024	Non-Homeless Special Needs	Citywide	Public Services	CDBG: \$26,400	Public service activities other than Low/Moderate Income Housing Benefit: 2,800 Persons Assisted
4	Homeless Continuum of Care	2020	2024	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$27,000	Public service activities other than Low/Moderate Income Housing Benefit: 195 Persons Assisted Homeless Person Overnight Shelter: 35 Persons Assisted Homelessness Prevention: 255 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Program Administration	2020	2024	Administration	Citywide	Administration and Planning	CDBG: \$71,200	Other: 61 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Infrastructure and Facility Improvements
	Goal Description	Improve and expand public infrastructure and facilities that benefit low- and moderate-income neighborhoods and residents
2	Goal Name	Housing Preservation
	Goal Description	Improve or expand the supply of housing affordable to lower-income households
3	Goal Name	Public Social Services
	Goal Description	Provide or improve access to public social services for low- and moderate-income persons and persons with special needs
4	Goal Name	Homeless Continuum of Care
	Goal Description	A continuum of supportive and housing services for the homeless and households at risk of homelessness
5	Goal Name	Program Administration
	Goal Description	Provide for administration and planning activities to address needs identified in the Consolidated Plan, including services to address impediments to fair housing

Projects

AP-35 Projects – 91.220(d)

Introduction

The following activities have been allocated CDBG funds for Fiscal Year (FY) 2020-2021.

Projects

#	Project Name
1	Camino Health Center
2	Family Assistance Ministries
3	Fun On The Run
4	Laura's House
5	Fair Housing Foundation
6	CDBG Program Administration
7	Capital Project - Avenida Cabrillo Sidewalks (Year 2)
8	Housing Rehabilitation

Table 56 – Project Information

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 lower-income households and households with special needs, especially those at risk of becoming homeless. Consistent with the City’s Homeless Strategy, resources will be allocated to provide safety net services, which will help at-risk households maintain their current housing. The City will use CDBG funds and program income (i.e., funds generated by the repayment of housing rehabilitation loans) to assist homeowners in undertaking the improvement of their residences and incur additional housing cost burden. The City will also encourage and support OCHA’s efforts to obtain additional rental assistance funding for San Clemente households.

AP-38 Project Summary

Project Summary Information

Table 57 – Project Summary

1	Project Name	Camino Health Center
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$17,000
	Description	Low cost medical and pediatric dental services for low- and moderate-income persons
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2,550 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 a reduced cost for lower-income persons and indigents
2	Project Name	Family Assistance Ministries
	Target Area	Citywide
	Goals Supported	Homeless Continuum of Care
	Needs Addressed	Homeless Support Services and Housing
	Funding	CDBG: \$17,000
	Description	Financial assistance and case management to prevent homelessness

	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	255 low- and moderate-income persons
	Location Description	Citywide
	Planned Activities	Housing and utility financial assistance to assist households at risk of homelessness
3	Project Name	Laura's House
	Target Area	Citywide
	Goals Supported	Homeless Continuum of Care
	Needs Addressed	Homeless Support Services and Housing
	Funding	CDBG: \$10,000
	Description	Shelter, counseling, and support services for victims of domestic violence
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	230 individuals that are victims of domestic violence (Emergency Shelter - 10, Transitional Housing -25, and Counseling/Hotline – 195)
	Location Description	Citywide
	Planned Activities	Shelter, counseling, and support services for victims of domestic violence
4	Project Name	Fun On The Run
	Target Area	Citywide
	Goals Supported	Public Social Services
	Needs Addressed	Public Services
	Funding	CDBG: \$9,400

	Description	Youth recreation program
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 255 youths
	Location Description	Citywide
	Planned Activities	After school recreation and homework assistance program with a focus on low- and moderate-income children
5	Project Name	Fair Housing Foundation
	Target Area	Citywide
	Goals Supported	Fair Housing Services
	Needs Addressed	Administration
	Funding	CDBG: \$5,000
	Description	Fair housing outreach, education, and enforcement services to reduce and eliminate impediments to the fair access of housing
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	60 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

6	Project Name	CDBG Program Administration
	Target Area	Citywide
	Goals Supported	Program Administration
	Needs Addressed	Administration
	Funding	CDBG: \$66,200
	Description	CDBG program oversight and coordination
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	910 Calle Negocio Ste. 100, San Clemente CA – City Hall
	Planned Activities	Program oversight and coordination, including management of public service grants, housing rehabilitation programs, and preparation of required applications and reports
7	Project Name	Capital Project: Avenida Cabrillo Sidewalks (Year 2)
	Target Area	CDBG census tracts
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$348,000
	Description	Installation of missing and replacement of deteriorated sidewalks.
	Target Date	06/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 1,810 individuals, 77.90% of which are low- and moderate-income

	Location Description	Avenida Cabrillo between Calle Seville and El Camino Real (CT: 0421.08 BG: 2 & 5)
	Planned Activities	Installation of missing or deteriorated sidewalks – Phase 1 construction will be built between Avenida Cabrillo from S. Calle Seville to S. Ola Vista
8	Project Name	Housing Rehabilitation
	Target Area	Citywide
	Goals Supported	Housing Preservation
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$57,091 plus program income (Revolving Loan Funds)
	Description	CDBG funded housing rehabilitation loans or grants for eligible homeowners
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2 owner-occupied housing units
	Location Description	Citywide
	Planned Activities	CDBG funds (\$57,091 in FY 20-21 funds plus program income received during the year) for homeowner housing rehabilitation loans or grants to address housing/building code deficiencies and deferred property improvements

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 Consolidated Plan, these households are contributing a significant portion of their income to maintain 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. The City’s housing rehabilitation program will assist elderly homeowners

in undertaking the improvement of respective residences to address specific household needs and upgrade the City's rental housing stock. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding for San Clemente households.

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

Almost all activities slated for CDBG-funding during FY 2020-21 will be available on a citywide basis to income-eligible individuals and households. These activities include public services and housing rehabilitation. Activities such as sidewalk improvements will be limited to specific areas of the City where a significant percentage of residents meet HUD’s income limits. A map of the City’s CDBG Target Areas is provided as **Attachment 3 – Map D**.

Geographic Distribution

Target Area	Percentage of Funds
CDBG census tracts	66
Citywide	34

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG funds will be allocated to programs that serve San Clemente residents regardless of where they live in the community.

Discussion

CDBG funds will be allocated to programs that serve San Clemente residents regardless of where they live in the community. The bulk of FY 2020-2021 CDBG funds will be used to replace deteriorated or install missing sidewalk segments – according to HUD data, 77.8% of the project area residents are low- and moderate-income.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

CDBG funds will be allocated for housing rehabilitation assistance in FY 2020-2021. The City will also use CDBG program income resources (i.e., rehabilitation loan repayments) to fund housing rehabilitation assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	2
Special-Needs	0
Total	2

Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	2

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

Discussion

If available, the City will utilize CDBG and loan repayment funds (Revolving Loan funds) to assist with the rehabilitation of owner-occupied housing units. The City will also continue to support OCHA's program activities in the community. An estimated 150 households will receive rental assistance vouchers or certificates during FY 2020-2021.

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 emphasizes preventing homelessness since it is less expensive and disruptive to keep a household housed in place. To this end, the City will continue to support local agencies with CDBG resources that provide a variety of services for lower-income households, including food banks, rent/utility assistance, and reduced cost childcare and healthcare services. These safety net programs can help a household maintain its current housing situation and avoid homelessness.

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

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

The City 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 Mercy House 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

As indicated in the Consolidated Plan, Family Assistance Ministries manages 44 emergency and 14 transitional shelter beds in the San Clemente. These shelter beds are earmarked for homeless families with children. Additionally, Laura's House offers shelter for victims of domestic violence. FY 2020-2021 CDBG funding is allocated to support emergency and transitional housing provided by Laura's House. It is projected that 10 individuals will be assisted with CDBG-funded emergency shelter and 25 with CDBG-funded transitional housing.

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

As outlined above, the City will focus its CDBG resources on preventing homelessness and assisting those already homeless. For FY 2020-2021, no CDBG funding is also allocated for rapid rehousing or permanent supportive housing; however, the 2019 PITS indicates there are 35 permanent supportive

scattered-site shelter beds in the City. Only a handful of these beds are likely to be in San Clemente, with many disbursed throughout neighboring communities.

Upon request, the City will support agencies that provide homeless housing and supportive services by providing a Certification of Consistency with the Consolidated Plan. (Note that in addition to being consistent with the Consolidated Plan, programs must also comply with applicable federal, state and local regulations). Additionally, the City will continue to support the OC-CoC as it seeks resources to address regional homeless issues, and also support OCHA's efforts to obtain additional housing assistance vouchers for homeless Veterans (VASH). OCHA reports that as of November 2019, four veteran households are benefitting from VASH housing assistance in San Clemente.

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. CDBG funding is allocated to provide financial assistance and case management to prevent homelessness. The City will also continue to participate in regional homeless planning efforts, including the OC-CoC's Discharge Plan, which will help prevent individuals leaving institutions, hospitals, etc., from becoming homeless.

CDBG funding is allocated to Family Assistance Ministries to provide housing and utility assistance to help near-homeless households maintain stable housing. Additionally, Laura's House will utilize 2020-2021 CDBG funding to provide crisis intervention and counseling services for victims of domestic violence that are at risk of homelessness.

Discussion

The City's homeless strategy is to help prevent homelessness and to support local service providers' efforts to seek additional resources. CDBG funds are allocated for safety net services that will help households at risk of homelessness redirect limited income toward housing. If necessary, financial assistance and case management may be provided. CDBG funds will also be utilized to support emergency and transitional housing services offered by local nonprofits.

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

Introduction:

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

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

Affordable Housing Funds: The City will encourage developers to include affordable housing units within 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 Funds 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 a vital role by assisting property owners and developers in navigating 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 time and cost savings development processes, including one-stop permitting, pre-permit application meetings, and concurrent permit application processing. For an 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 that are appropriate for the community and are detailed in the City's Housing Element.

Discussion:

The City's Housing Element identifies several barriers to the development of affordable housing opportunities. The Housing Element identified several actions the City can take to reduce these impacts. No projects are currently planned or under construction that are using these incentives.

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 CDBG funds for activities that address the service needs of the lower-income and special needs households. Additionally, the City will encourage and support OCHA's efforts to obtain additional rental assistance funding for these households. CDBG resources will be available to help housing rehabilitation. This program is available to assist homeowners in undertaking the improvement of 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 2020-2021 to foster and maintain affordable housing. The Consolidated Plan identifies 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 or grants, owners can rehabilitate their properties to meet basic housing quality standards and incur zero or minimal additional housing costs. CDBG funding, including program income, is allocated for housing rehabilitation in FY 2020-2021.

Actions planned to reduce lead-based paint hazards

To ensure compliance with federal regulations, all housing units constructed before 1978, that are rehabbed with CDBG funds, must be tested for lead-paint hazards. If lead is found, additional assistance may be provided to eliminate or mitigate lead hazards in compliance with current regulations.

Actions planned to reduce the number of poverty-level families

As previously outlined, approximately 6.4% of the City's population is living below the poverty level, including 7.4% of children under the age of 18 and 4.3% of seniors (age 65 and older). During FY 2020-2021, the City will fund the following activities with the goal of reducing the number of poverty-level households:

- Support public services that provide a social safety net for lower-income households especially for the near-homeless
- Support OCHA's administration of the federal rental assistance program for very low-income renters
- Subject to the availability of funds, provide housing rehabilitation assistance for lower-income and special needs homeowners

Actions planned to develop institutional structure

The City has made an effort to establish an institutional structure that will help identify and access resources to improve the community. The City will continue to work with nonprofit and 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 OCHA to 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 OCHA 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 OCHA's plans and will provide OCHA the opportunity to review and consult with the City regarding its Consolidated Plan/Annual Action 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. Additionally, ongoing working relationships with local nonprofit social service providers promote the efficient and effective use of limited private and public resources to address the service needs of the community.

Discussion:

The City's actions to affirmatively further fair housing during FY 2020-2021 are included in the Analysis of Impediments (AI) for Fair Housing Choice. As indicated in the Strategic Plan, a summary of the City's current AI is provided as **Appendix A**. Action steps the City will take during FY 2020-2021 are also found in **Appendix A**.

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

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%

Discussion:

The City will meet the overall 70% benefit for low- and moderate-income requirements of the CDBG program over the three years of program years 2020-21, 2021-22, and 2022-23.

Attachments and Appendices

8/8/2019

Four-Year and One-Year Summary of Accomplishments

Grantee Name: City of San Clemente

Decent Housing						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Provide housing rehabilitation loans to assist senior, disabled and/or Low/Mod income homeowners improve primary residence.	CDBG	2016	Housing Units	4	2	50.0%
		2017	Housing Units	4	1	25.00%
		2018	Housing Units	5	1	20.00%
		2019	Housing Units			
		4-Yr Con Plan Goal		20	4	20.00%
Provide rehabilitation loans to rental property owners to improve rental housing units to applicable health and safety standards.	CDBG	2016	Housing Units	2	0	0.00%
		2017	Housing Units	1	0	0.00%
		2018	Housing Units	1	1	100.00%
		2019	Housing Units			
		4-Yr Con Plan Goal		4	1	25.0%
CDBG funds to support creation of new affordable rental housing oppotunities.	CDBG	2016	Housing Units	0	0	0.00%
		2017	Housing Units	0	0	0.00%
		2018	Housing Units	0	0	0.00%
		2019	Housing Units			
		4-Yr Con Plan Goal		1	0	0.0%
Support OC Housing Authority's efforts to provide Housing Choice Vouchers to lower income households.	HUD Housing Vouchers	2016	Housing Units	140	129	92.14%
		2017	Housing Units	130	154	118.46%
		2018	Housing Units	150	150	100.00%
		2019	Housing Units			
		4-Yr Con Plan Goal		140 (Annual Avg)	144 (3 Yr Avg)	102.86% (3 Yr Avg)
Suitable Living Environment						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Financial support for public & nonprofit agencies that provide services for lower income individuals . Supported agencies should provide access to programs & services at reduced or no cost.	CDBG	2016	Individuals	2,600	2,890	111.15%
		2017	Individuals	1,978	2,956	149.44%
		2018	Individuals	2,732	3,035	111.09%
		2019	Individuals			
		4-Yr Con Plan Goal		10,000	8,881	88.81%

Financial assistance for CDBG-eligible projects that improve or upgrade the City's infrastructure & address a community priority. Improvements may include repair/replace residential street, sidewalks, ADA compliance & related improvements.	CDBG	2016	Individuals	4,110	4,120	100.24%
		2017	Individuals	2,900	0	0.00%
		2018	Individuals	0	0	0.00%
		2019	Individuals			
		4-Yr Con Plan Goal		10,000	4,120	41.20%
Financial assistance for CDBG-eligible projects that improve or upgrade the City's public facilities & address a community priority. Improvements may include but are not limited to repairs, replacement &/or upgrades a neighborhood parks (including ADA compliance).	CDBG	2016	Individuals	1,965	1,965	100.00%
		2017	Individuals	0	0	0.00%
		2018	Individuals	0	0	0.00%
		2019	Individuals			
		4-Yr Con Plan Goal		5,000	1,965	39.30%
Economic Opportunity						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Provide commercial property rehabilitation grants to assist with business signage and other minor exterior improvements.	NA	2016	Businesses	9	1	11.11%
		2017	Businesses	7	1	14.29%
		2018	Businesses	7	0	0.00%
		2019	Businesses			
		4-Yr Con Plan Goal		20	2	10.00%
Continuum of Care						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
Support service providers that assist individuals at risk of becoming homeless and those already homeless. Services include short-term financial subsidy to prevent eviction &/or utility termination, emergency shelter, transitional housing, rapid rehousing &/or permanent supportive housing. Housing is provided in conjunction with supportive	CDBG	2016	Individuals	0	0	0.00%
		2017	Individuals	230	119	51.74%
		2018	Individuals	73	64	87.67%
		2019	Individuals			
		4-Yr Con Plan Goal		25	183	732.00%
Other (O-1)						
Objective	Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
CDBG program oversight, coordination and administration .	CDBG	2016	Year of Admin	1	1	100.00%
		2017	Year of Admin	1	1	100.00%
		2018	Year of Admin	1	1	100.00%
		2019	Year of Admin			
		4-Yr Con Plan Goal		4	3	75.00%
Implement action plan to address impediments to fair housing including financial support for fair housing education, training & referral services & enforcement of fair housing laws & prosecute fair housing law violators.	CDBG	2016	Households	100	68	68.00%
		2017	Households	80	53	66.25%
		2018	Households	80	55	68.75%
		2019	Households			
		4-Yr Con Plan Goal		400	176	44.00%

PUBLIC NOTICE
NOTICE OF 30-DAY PUBLIC COMMENT PERIOD
AND PUBLIC HEARING TO BE HELD BY THE
CITY OF SAN CLEMENTE
REGARDING SUBMISSION OF THE 2020-2024 CONSOLIDATED PLAN AND 2020-2024 ORANGE COUNTY ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING

NOTICE IS HEREBY GIVEN that the City of San Clemente City Council will hold a public comment period and a public hearing for the 2020-2024 Consolidated Plan, which includes the 2020-2021 Annual Action Plan, amendments to the City's Citizen Participation Plan, and the 2020-2024 Orange County Analysis of Impediments to Fair Housing. This action is taken in compliance with federal regulations [24 CFR 91].

As a recipient of Community Development Block Grant (CDBG) funds, the City is required to prepare a Consolidated Plan every five years. The City is also required to update the related Action Plan on an annual basis. The Consolidated Plan is a five-year 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. The Citizen Participation Plan outlines the steps the City will take to engage public participation in the use of CDBG funds.

As a recipient of CDBG funds, the City of San Clemente is required to comply with the Fair Housing Act of 1968. In addition to prohibiting discrimination based on race, color, religion, disability, and other protected personal and familial attributes, the City is required to affirmatively further fair housing. The Analysis of Impediments (AI) to Fair Housing Choice is the primary policy document utilized by the City for this purpose. The City is a participant in preparation of the 2020-2024 Orange County Analysis of Impediments to Fair Housing Choice (Orange County AI).

30-Day Public Comment Period

The required 30-day public comment period for the documents listed above will commence April 17, 2020, and will end May 18, 2020. The draft documents will be available for public review on the City's website (www.san-clemente.org), and upon request by contacting staff. Written comments regarding the draft documents may be submitted to the attention of Gabriel Perez at San Clemente City Hall – 910 Calle Negocio or by email perezg@san-clemente.org. All written comments must be received by the City no later than 12 PM May 18, 2020.

2020-2021 Action Plan

HUD has notified the City it will receive an allocation of \$356,108 in CDBG funds for Fiscal Year 2020-2021. An additional \$175,583 in prior year uncommitted funds will also be available for public facility and/or infrastructure improvements. Housing rehabilitation loan repayments will also be available to fund additional housing rehabilitation assistance. The proposed use of CDBG funds for Fiscal Year 2020-2021 includes the following:

<u>Proposed Activity</u>	<u>Proposed CDBG Allocation</u>
• Public services for lower income persons and special needs populations	\$53,400
• Public facility and/or infrastructure improvements	\$231,508
• Program administration (including Fair Housing counseling)	\$71,200

Public Hearing

The City is also required to hold a public hearing to obtain additional public comments regarding the documents listed above. Notice is hereby given that the City of San Clemente City Council will hold a public hearing on Tuesday May 19, 2020, for this purpose. The hearing will be held in the City Council Chambers, 100 Avenida Presidio, San Clemente, California. The City Council meeting will be held at 6:00 PM or soon thereafter. For additional information regarding the hearing (including reasonable requests for special accommodations for persons with disabilities), please contact the City Clerk at (949) 361-8200.

If you wish to challenge the City's decision in court, the challenge will be limited only to those issues you or someone else raised at the public hearing, prior to the public hearing, or in written correspondence delivered to the City Clerk's Department, prior to, the public hearing described in this notice.

The agenda report for this item will be available Friday, May 15, 2020, by 5:00 p.m. on the City's website at www.san-clemente.org. In order to do our part in helping to slow the spread of the COVID-19 virus, and in coordination with recent health guidelines, the City has modified its services. A copy of the report may be obtained by contacting the City Clerk, at (949) 361-8200, it is recommended that you contact the City Clerk to ensure a copy of the report is available for distribution.

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

SUMMARY OF PUBLIC COMMENTS

30-DAY PUBLIC REVIEW PERIOD

To be updated at the end of the public review period.

MAY 19, 2020 PUBLIC HEARING

To be updated at the conclusion of the public hearing.



Community Meeting 5 Year Consolidated Plan Block Grant Program

Thursday, January 30

6:00 PM

Ole Hanson Fireside Room, San Clemente Community Center
100 N. Calle Seville, San Clemente

The City of San Clemente receives approximately \$350,000 in Community Development Block Grants (CDBG) each year from the Department of Housing and Urban Development for housing and community development projects.

All community members, service providers, and professionals are invited to discuss the needs of low and moderate income community in the City of San Clemente. Your input will help set the priorities for use of CDBG funds for the 5 year Consolidated Plan.

Written comments may be emailed to Gabriel Perez, City Planner at perezg@san-clemente.org Comments or sent to:

Gabriel Perez
910 Calle Negocio
San Clemente, CA 92673

SOCIAL AND PUBLIC SERVICES

Senior Services ● ● ●

Youth Services ● ●

Childcare Services

Services for the Disabled

Services for Victims of Domestic Violence ●

Services for Abused & Neglected Children ● ● ● ●

Substance Abuse Services ● ●

Healthcare Services ● ● ● ●

Mental Health Services ● ● ● ● ●


Graffiti Removal


Food Banks ●

Other

HOMELESS SERVICES

Homeless Outreach Services 

Emergency Shelter (1 to 90 days) 

Transitional Housing (over 90 days) 

Permanent Housing 

Homelessness Prevention (1-Time Rent/Utilities) 

Food & Clothing

Mental & Behavioral Health Services 

Substance Abuse Programs 

Storage Facilities

Other

HOUSING SUPPLY/IMPROVEMENTS

Housing for Lg Families (5+ person) ●

Housing for Sm Families (1-2-person)

Housing for Seniors (Age 62 and Older) ● ● ●

Housing for Persons w/ Special Needs

Homebuyer Assistance

Rehab: Owner-Occupied

Rehab: Renter-Occupied

Rehab: Energy Efficiency Improvements

Acquisition (For Affordable Housing)

Other Housing Needs

COMMUNITY FACILITIES

Senior Centers

Youth Centers

Centers for the Disabled

Health Facilities ● ●

Parks & Recreation Facilities

Neighborhood/Community Centers

Rehab: Publicly Owned Buildings ●

ADA Improvements: Publicly Owned Facilities ●

Other Community Facilities

PUBLIC INFRASTRUCTURE

Residential Street Improvements ●

Sidewalks/Gutters ●

Street Lighting

Flood Prevention/Drainage

Sewer System Improvements ● ●

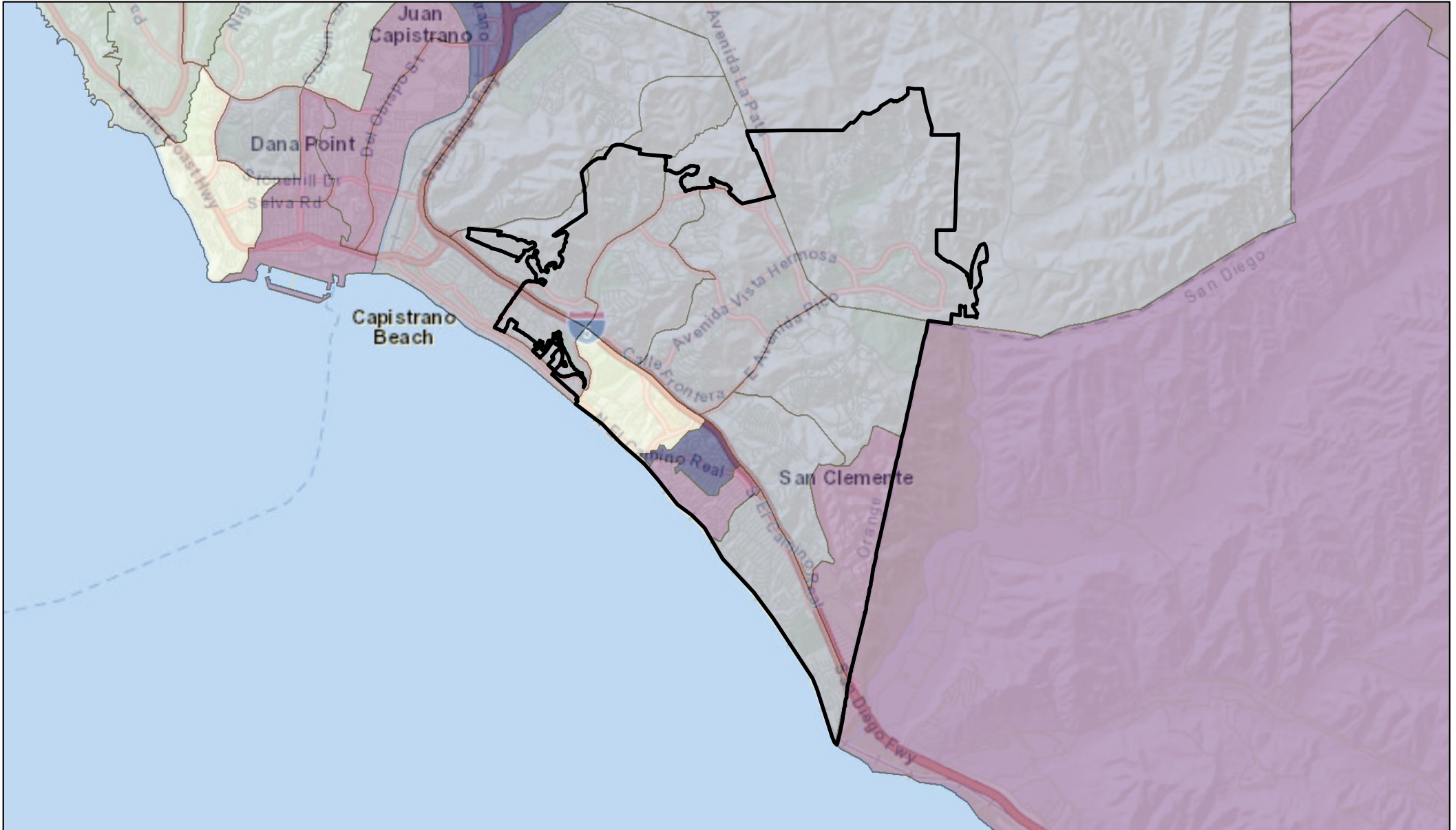
Water System Improvements ●

Tree Planting

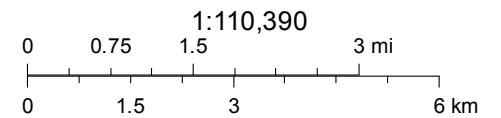
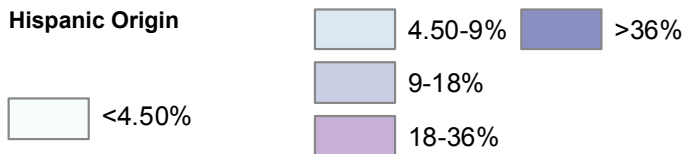
ADA-Compliant Public Improvements ●

Other Public Infrastructure Improvements

Map A - City of San Clemente - Hispanic Concentration

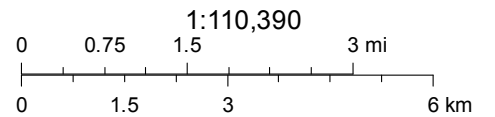
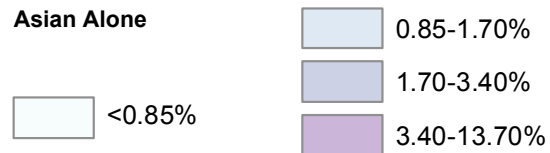
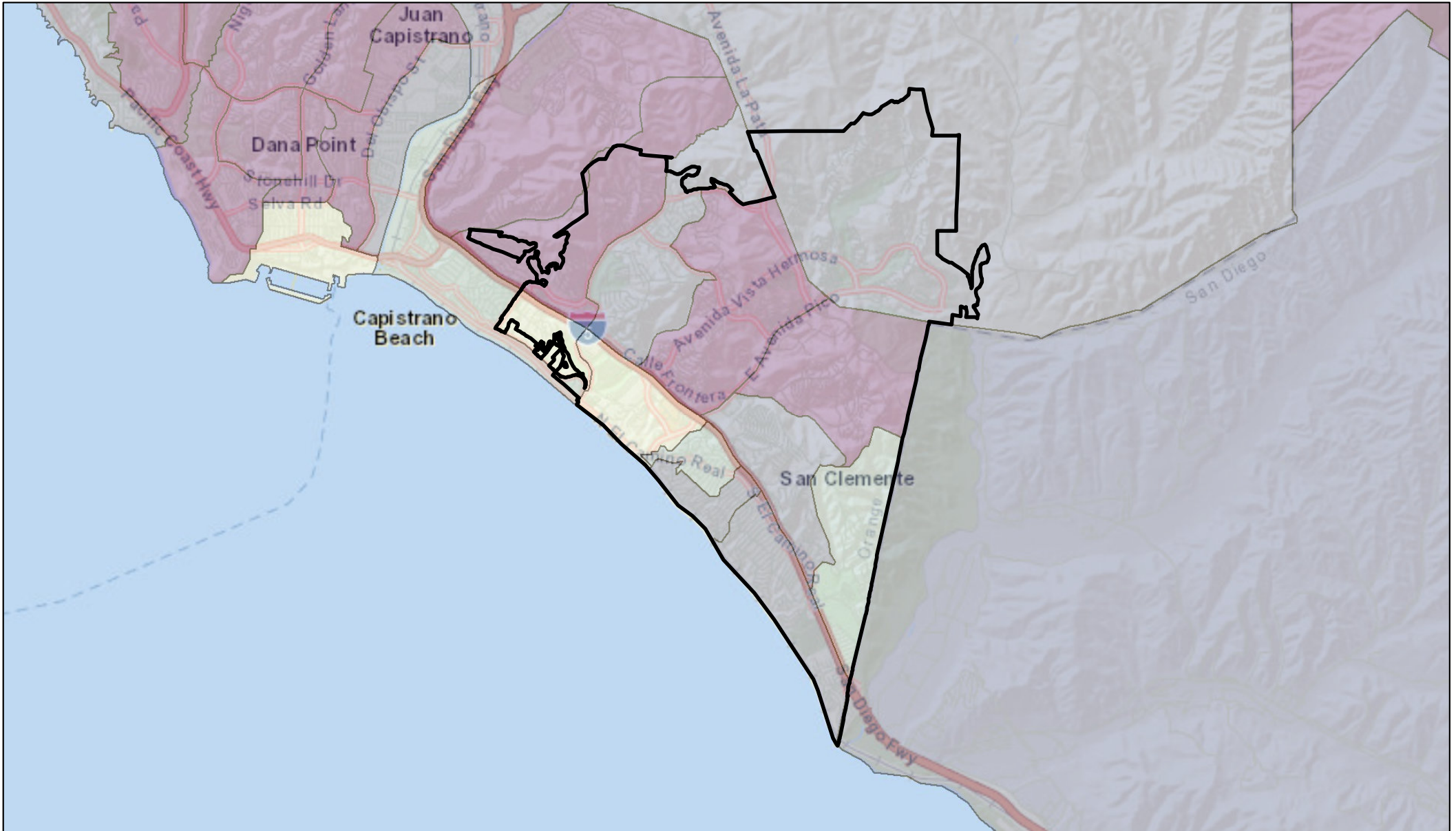


Hispanic Origin



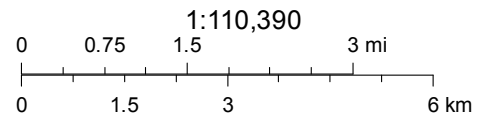
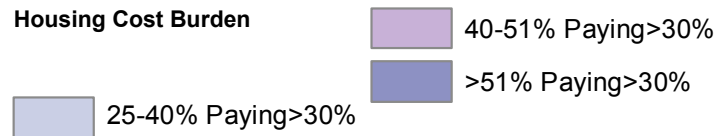
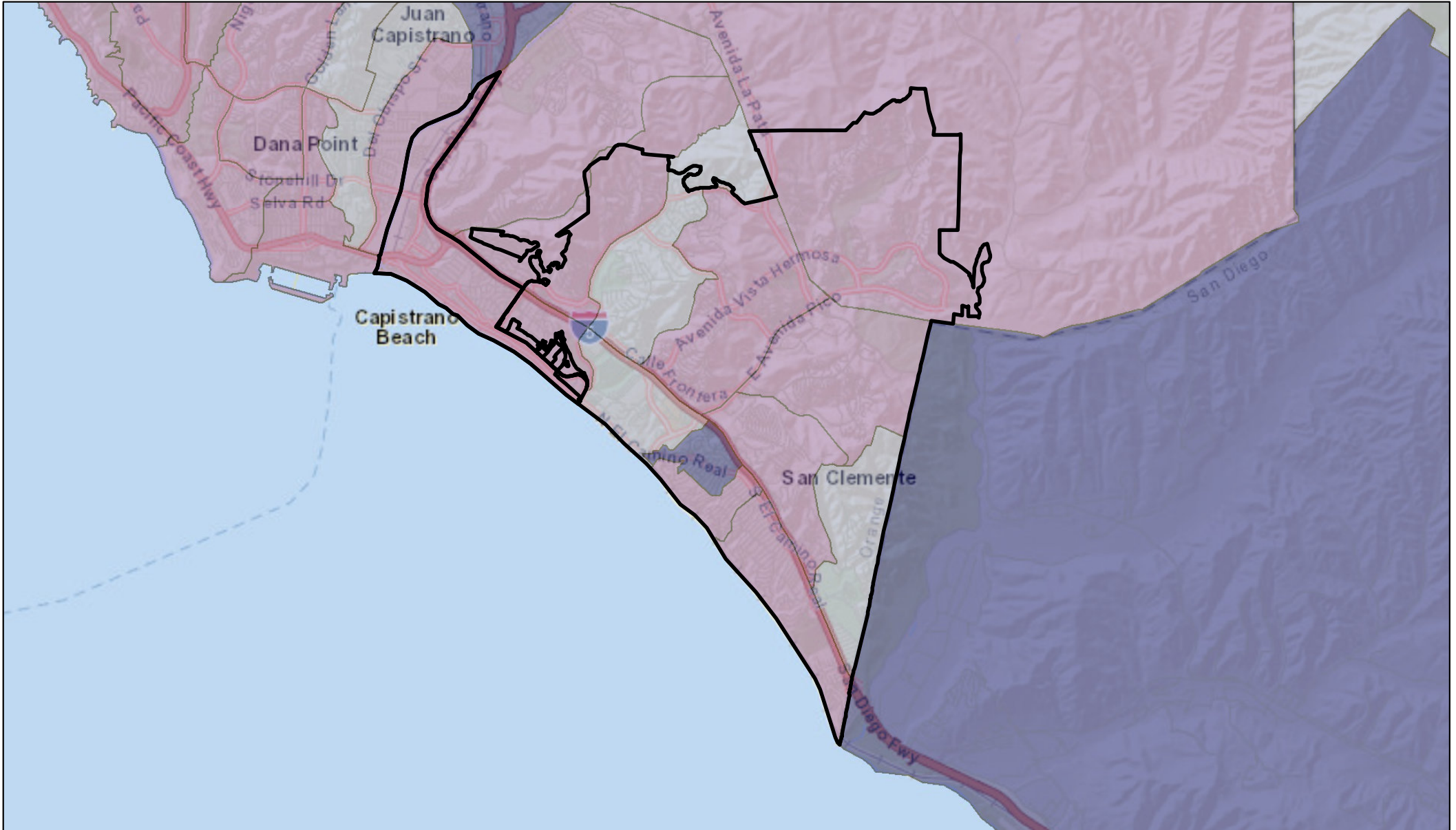
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Map B - City of San Clemente - Asian Concentration



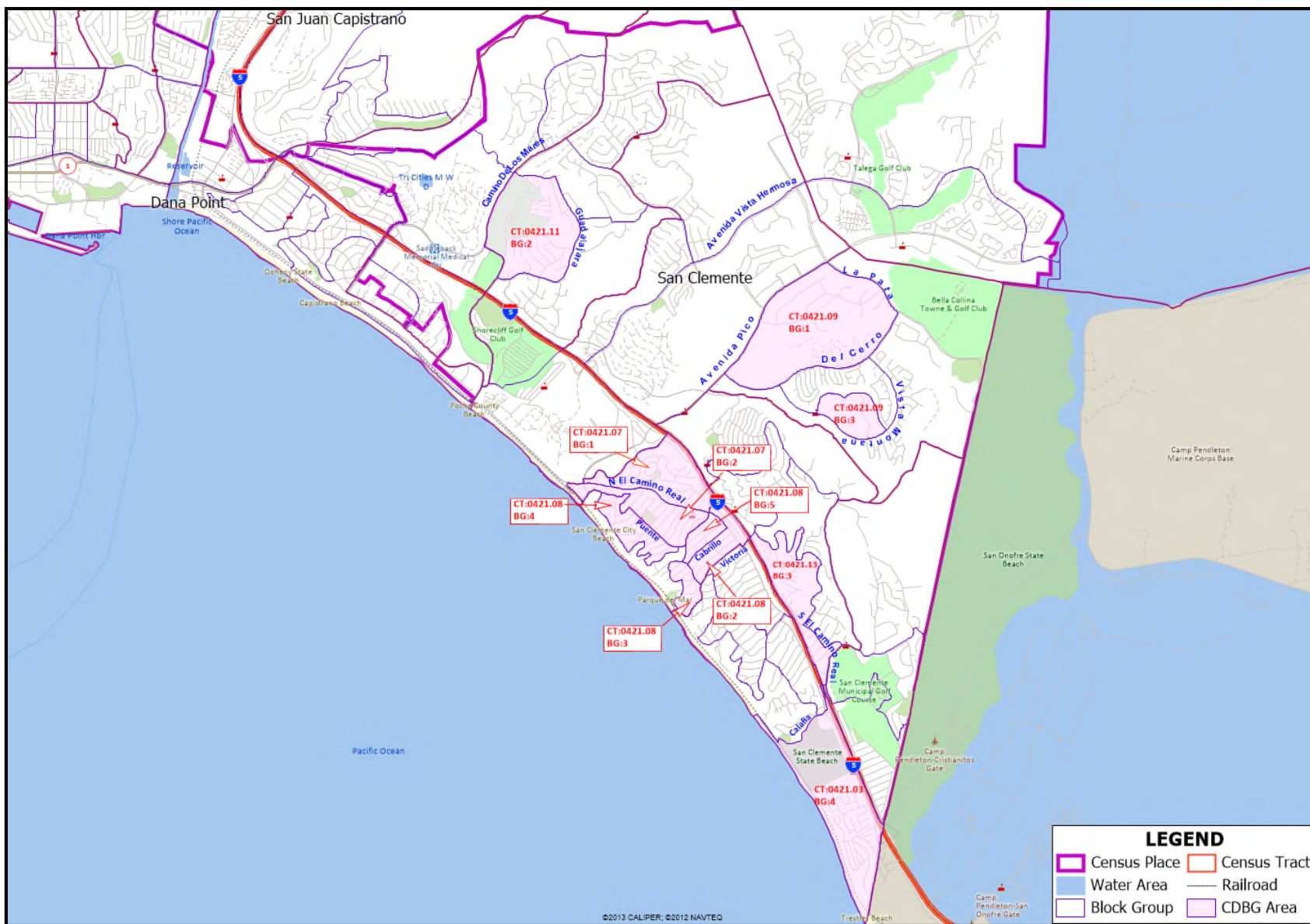
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Map C - City of San Clemente - Housing Cost Burden Concentration



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

Map D - CDBG Target Areas

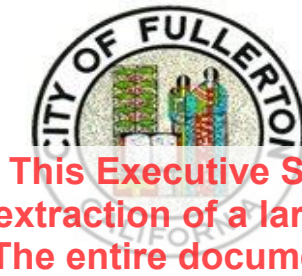


Non-Public Housing Affordable Units

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
Mary Erickson Community Housing	143 West Marquita 135 W. Canada	HOME	4 – 2 br 4 – 3 br 1 – 4 br	12	12	2004	2032
The Presidio (Casa de Seniors)	105 Avenida Presidio	LIHTC Sec 8/ Sec 202	18 – 0 br 54 – 1 br	72	72	1986	2034
Mary Erickson Community Housing	1042 Calle Del Cerro #201 1050 Calle Del Cerro #604 1052 Calle Del Cerro #712 1064 Calle Del Cerro #1303	HOME, City RDA	4 – 2 br	4	4	2004	2066
Cotton's Point Senior Apartments	2358 South El Camino Real	LIHTC MHSA, City RDA	61 – 1 br 15 – 2 br	76	76	2014	2069
Las Palmas Apartments	115 Avenida Serra	LIHTC, HCD IIG 1	19 – 1 br	18	19	2015	2070
Vintage Shores Apartments	366 Camino De Estrella	LIHTC	80 – 1 br 42 – 2 br	120	122	2002	2057
Mendocino at Talega Jamboree Apartments Phase I	123 Calle Amistad	LIHTC	60 – 2 br 64 – 3 br	123	124	2003	2058
Mendocino at Talega Jamboree Apartments Phase II	123 Calle Amistad	LIHTC	31 – 2 br 31 – 3 br	61	62	2003	2058
TOTAL				492	497		

Source: City of San Clemente, 2013-2021 Housing Element; 2017 Midterm Update (September 2017)

ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



This Executive Summary is an extraction of a larger document. The entire document is available for public review on the City's website:

www.san-clemente.org



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

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II. EXECUTIVE SUMMARY

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

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

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

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

Overview of Orange County

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

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

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

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

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

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

Contributing Factors to Fair Housing Issues

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

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

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

Proposed Goals and Strategies

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

Regional Goals and Strategies

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

Strategies:

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

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

Strategies:

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

Goal 3: Increase community integration for persons with disabilities.

Strategies:

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

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

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

Strategies:

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

Goal 5: Expand access to opportunity for protected classes.

Strategies:

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

Individual Jurisdictions' Proposed Goals and Strategies

City of Aliso Viejo

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

City of Anaheim

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

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

City of Buena Park

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

City of Costa Mesa

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

City of Fountain Valley

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

City of Fullerton

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

City of Garden Grove

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

City of Huntington Beach

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

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

City of Irvine

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

City of La Habra

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

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

City of Laguna Niguel

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

City of Lake Forest

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

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

City of Mission Viejo

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

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

City of Orange

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

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

City of Rancho Santa Margarita

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

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

City of San Clemente

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

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

City of San Juan Capistrano

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

City of Santa Ana

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

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

City of Tustin

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

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

Draft

CITIZEN PARTICIPATION PLAN

The City of San Clemente Citizen Participation Plan has been prepared pursuant to federal regulations and the City's desire to encourage and support public participation in the development of the Consolidated Plan and related documents. The Consolidated Plan is a five-year strategic plan that identifies priority needs in the community and the activities that can be funded with certain federal resources that will address these needs. The actions outlined in the Citizen Participation Plan only relate to the planning and expenditure of funds provided to the City by the U.S. Department of Housing and Urban Development's (HUD) Office of Community Planning and Development (CPD). Specifically, the City receives Community Development Block Grant (CDBG) funds from HUD-CPD. It is the City's goal to ensure the input of residents and other stakeholders will be a significant component of the decision-making process culminating in the adoption of the Consolidated Plan, annual updates, related documents, and year-end reporting.

APPLICABILITY & ADOPTION OF THE CITIZEN PARTICIPATION PLAN

As required by HUD, the Citizen Participation Plan has been developed to ensure San Clemente residents participate in the development of a strategy to meet priority housing and community needs of the City and to provide input on the utilization of federal HUD-CPD entitlement funds. Citizen involvement will be encouraged in the development of the Consolidated Plan and subsequent annual updates to the Consolidated Plan. The Citizen Participation Plan will also affect the process by which community stakeholders are included in the assessment of program performance and any substantial amendments to the Consolidated Plan.

The City will encourage public participation through various means. Community wide notices in the form of newspaper advertisements announcing public workshops, meetings, and/or public hearings will be one of the primary means utilized to inform residents/stakeholders if significant actions related to Consolidated Plan. Other methods of communication that may be utilized include special mailings and video/electronic communication (e.g., cable TV notices and City's web page site).

ADOPTION OF THE CITIZEN PARTICIPATION PLAN

The authorization of the San Clemente City Council to submit the Consolidated Plan to HUD will constitute the official adoption of the Citizen Participation Plan. Similarly, authorization of the Council to submit subsequent annual updates to the Consolidated Plan and annual performance reports will constitute a formal adoption.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

To the greatest extent feasible, the City of San Clemente's Citizen Participation process emphasizes the involvement of Low- and Moderate-income residents (as defined by HUD) and/or entities that represent or serve the community's lower income population. Additionally, as required by federal regulations, efforts will also be taken to encourage the participation of the City's racial and ethnic minorities, non-English speaking individuals, individuals with disabilities, and recipients of federal housing rental assistance.

The following elements of the City's Citizen Participation Plan have been devised to ensure San Clemente resident are provided ample opportunities to become involved and represented in the Consolidated Plan planning process.

- Citizen participation is open to any person wishing to attend any of the meetings, hearings, and/or workshops sponsored by the City regarding HUD-CPD programs.
- Public hearings will be held before the City Council to obtain public comments at various stages of Consolidated Plan preparation and adoption. Public input will be recorded by the City as required by federal regulations for inclusion in Consolidated Plan-related documents.
- From time to time, the City's Human Affairs Committee will serve as an additional means for residents and stakeholders to provide input in the Consolidated Plan process. Specifically, the Human Affairs Committee will hear and provide input on the housing and social service needs of the City. Committee meetings may also be utilized as a forum to develop strategies and priorities for addressing priority housing and non-housing needs of the community. If appropriate, recommendations of the Human Affairs Committee will be included in related staff reports to the City Council.
- As appropriate and/or needed, additional citizen participation will be encouraged via neighborhood and community-wide public meetings or hearings.

The City will work in partnership with the Orange County Housing Authority (OCHA) to ensure participants in their rental assistance program are afforded opportunities to

participate in the Consolidated Plan process. Additionally, the City will work with OCHA to build consistency and mutual support for the goals outlined in the Authority's five-year Agency Plan and the City's Consolidated Plan. The City's Community Development staff will attend regular meetings of the Cities Advisory Committee sponsored by OCHA

CITIZEN COMMENTS REGARDING DEVELOPMENT OF THE CITIZEN PARTICIPATION PLAN & AMENDMENTS TO THE CITIZEN PARTICIPATION PLAN

Pursuant to HUD regulations, San Clemente residents and stakeholders will be given no less than 30 days to submit written comments during the development of the Citizen Participation Plan (and/or substantial amendments to the Citizen Participation Plan) prior to the submission of the Plan to HUD. The Citizen Participation Plan, and any amendments, will be available for public review at following locations:

- City Hall - Community Development Department
- City of San Clemente website - www.san-clemente.org

San Clement City Hall is accessible to persons with physical disabilities; however, if a physical disability would limit an individual's ability to review the plan, upon request, the City will make a reasonable effort to make the plan (and/or amendments) available in an appropriate format.

CITIZEN PARTICIPATION IN DEVELOPMENT OF THE CONSOLIDATED PLAN

Before the Consolidated Plan (or a subsequent annual update) is adopted by the City Council and submitted to HUD, Community Development Department staff will make the draft plan available to residents, public agencies, and other interested parties for review and comment. The City will publish its proposed Consolidated Plan (and annual updates) so that all affected residents will have sufficient opportunity to review and comment on the plan. A summary describing the contents and purpose of the Consolidated Plan will be published in one or more newspapers of general circulation. At a minimum, information that will be provided in a public notice will include the amount of CDBG grant funds the City expects to receive (including program income), and activities to be undertaken. If applicable, information will also include the steps the City will take to eliminate the need for the displacement of residents and/or businesses. If displacement will occur due to any planned actions, the City will comply with the

requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (and implementing regulations in 49 CFR part 24).

The draft Consolidated Plan will be available to residents and other interested parties to facilitate their participation in the development of the plan. The proposed plan will be made available for review at the following locations:

- City Hall - Community Development Department
- City of San Clemente website - www.san-clemente.org

Additionally, a reasonable number of free copies will be available via the Community Development Department.

During the development of the Consolidated Plan (and subsequent annual updates) there will be at least one public hearing to obtain comments from persons affected by the use of HUD-CPD funds and other interested parties. Additionally, as required by program regulations, there will be a 30-day public comment period prior to the submission of the Consolidated Plan to HUD. The City will consider all comments received from residents, public agencies and other interested parties as it prepares the final Consolidated Plan (and annual updates). A summary of public comments will be included with the final submission. The summary of public comments will include a synopsis of the City's response to written public comments, and an explanation of public comments not accepted including the reasons why these comments were not accepted.

AMENDMENTS TO THE CONSOLIDATED PLAN

The City will amend the Consolidated Plan or a subsequent annual update whenever one or more of the following decisions are made:

1. There is a change in the original relative priority designation of a housing or community need, or there is a change in the original purpose, scope, location or beneficiaries of an activity listed in a final plan submitted to HUD.
2. The City decides to undertake an activity that was not previously included in the Consolidated Plan or a subsequent annual plan.

HUD requires that if the City undertakes a **substantial amendment** to the Consolidated Plan (or a subsequent annual plan), residents and stakeholders must be provided with reasonable notice of the proposed amendment and also provided an opportunity to

comment on the proposed amendment. A substantial amendment to the Consolidated Plan (or subsequent annual plan) is defined as:

1. A change in the use of CDBG funds from one eligible activity to another, for example, changing CDBG funds allocated for housing rehabilitation to a sidewalk improvement project), and/or
2. The reallocation of 45 percent or more of an annual CDBG allocation from one or more eligible activities to one or more other eligible program activities.

Changes in funding for an existing project not amounting to more than 45 percent of the City's annual CDBG allocation are not considered a substantial change; no formal amendment to the Action Plan requiring public review and comment will be warranted. A summary of the amendment will be included in the year-end report to HUD. The reallocation of CDBG funds at the end of the fiscal year from a canceled activity or an activity that does not expend any funds during the year is not considered a substantial amendment.

A substantial amendment will be subject to a public hearing and 30-day public comment period. The City will publish the proposed substantial amendment to the Consolidated Plan (or annual update) so that residents and interested parties will have sufficient opportunity to review and comment on the amendment. A summary describing the purpose of the amendment will be published in one or more newspapers of general circulation. A reasonable number of free copies of the proposed amendment will be available upon request. Additionally, a copy of the proposed amendment will be made available for review at the following locations:

- City Hall - Community Development Department
- City of San Clemente website - www.san-clemente.org

Prior to notifying HUD of the substantial amendment to an authorized Consolidated Plan (or a subsequent annual update) the City will hold a 30-day public comment period. Additionally, the City Council will hold a public hearing to obtain public comments regarding the amendment. The City will consider all comments received from residents, public agencies and other interested parties regarding the amendment prior to HUD submittal. A summary of public comments will be included with the City's notification of the amendment to HUD. The summary of public comments will include a synopsis of the City's response to written public comments, and an explanation of public comments not accepted including the reasons why these comments were not accepted.

PERFORMANCE REPORTS

The City is required to submit an annual performance report describing the use of CDBG funds to HUD no later than 90 days from the end of a program year (i.e. late-September). This performance report is known as the Consolidated Annual Performance and Evaluation Report (CAPER). Prior to submitting the CAPER to HUD, the City will solicit and consider the comments of residents, public agencies, and other interested parties regarding the report.

As required by HUD, the City will publish a notice that its CAPER is available for public review in one or more newspapers of general circulation. This notice will contain information regarding the required 15-day public comment period and City Council meeting. The CAPER will be considered by the City Council prior to the submission of the CAPER to HUD for the purpose of obtaining additional public input.

In addition to making a reasonable number of free copies of the CAPER available for the public, the draft CAPER will be placed at the following locations:

- City Hall - Community Development Department
- City of San Clemente website - www.san-clemente.org

The City will consider all comments received from residents and interested parties during the comment period and public meeting. A summary of comments will be provided to HUD as part of the City's CAPER submission. The summary of public comments will include a synopsis of the City's response to written public comments, and if applicable, an explanation of why a public comment was not considered.

PUBLIC HEARINGS

The City of San Clemente will hold a public hearing each year to ensure that the public has ample opportunity to provide input regarding the development of proposed activities to be funded with CDBG resources. Year-end program performance will also be considered by the City Council during a public meeting prior to the submission of the CAPER to HUD. Public hearings and meetings will be held at times and locations that are convenient to residents that might or have benefited from CDBG-funding activities.

Rules for all public hearings/meetings include the following:

1. A notice of each hearing will be published at least 14 days prior to the meeting date. The notice will be published in a local newspaper of general circulation. All notices will be of a size and type to draw the attention of casual newspaper readers and will state the time, date, location and topics to be discussed.
2. Where a significant number of non-English speaking residents can be reasonably expected to participate, translators will be available.
3. Meetings will be held at locations that are accessible to persons with disabilities.
4. As necessary, virtual meetings may be held in place of in-person meetings when deemed necessary for public health or safety. Virtual meetings will afford the public the ability to engage in a live exchange of questions and answers with the City Council and City staff.

MEETINGS

Newspapers, special mailings, the City's web site, and other forms of communication will be utilized to notify residents and interested parties of meetings, workshops, and hearings related to the Consolidated Plan, subsequent annual updates and performance reports. As stated above, meetings will be scheduled at times and locations that are convenient to residents that might or have benefited from CDBG-funding activities and that are accessible to persons with disabilities.

AVAILABILITY OF INFORMATION TO THE PUBLIC

As previously stated, the City will publish announcements regarding the availability of its proposed Consolidated Plan (and subsequent annual updates), amendments, and performance reports, so that residents and interested parties will have sufficient opportunity to review documents and provide comments. Notices will be published in one or more newspapers of general circulation, and a reasonable number of free copies of the entire proposed plan, amendments, and performance reports will be available. Plans/reports will also be available for review at the following locations:

- City Hall - Community Development Department
- City of San Clemente website - www.san-clemente.org

Upon request (and within reason), the plan will be made available to persons with disabilities.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The Fair Housing Act of 1968 requires HUD and the City of San Clemente to administer housing and urban development programs in a manner that does not discriminate directly or indirectly based on race, color, religion, sex, national origin, age, familial status, disability, or other protected familial or personal traits. The Fair Housing Act not only prohibited discrimination in housing-related activities and transactions but also requires entities to affirmatively further fair housing. The Analysis of Impediments (AI) to Fair Housing Choice is the primary policy document utilized by the City for this purpose. The City participated in the preparation of the 2020-2024 Orange County Analysis of Impediments to Fair Housing. HUD requires the City to outline the process it will follow to approve the AI and for amending the AI. The same process for adopting and amending the Consolidated Plan will apply to the AI.

A substantial amendment to the AI entails a material change in circumstances that affects the information on which the AI is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AI no longer reflect actual circumstances. Examples include:

- Presidentially declared disasters in the City that is of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing
- Significant demographic changes
- New significant contributing factors in the City
- Civil rights findings, determinations, settlements, or court orders
- HUD's written notification specifying a material change that requires revision.

When a revision is required as a result of a material change, such a revision will be submitted within 12 months of the onset of the material change, or at such later date as HUD may provide. Where the material change is the result of a Presidential declared disaster, such time shall be automatically extended to the date that is two years after the date upon which the disaster declaration is made. HUD may extend such deadline, upon request, for a good cause.

ACCESS TO RECORDS

The City will provide access to information and records relating to the Consolidated Plan to residents, public agencies, and other interested parties. Additionally, information regarding the City's past use of CDBG will also be made available.¹

Requests for information and records must be made in writing to:

City of San Clemente
Community Development Department
910 Calle Negocio San Clemente, CA 92673

The written request must delineate the specific information that is being requested. Community Development staff will have 15-working days to respond to requests.

TECHNICAL ASSISTANCE

The City will provide technical assistance to groups representing Low- and Moderate-income persons that request help in developing proposals for CDBG funding. The City will determine the type and level of assistance that staff will provide for each group. Technical assistance does **not** include nor assure the awarding of CDBG funds.

COMPLAINTS

Written complaints regarding the preparation of the Consolidated Plan/annual updates, amendments and/or performance reports must be submitted in writing to:

City of San Clemente
Community Development Department
910 Calle Negocio San Clemente, CA 92673

The City will provide a written response to complaints within 15-working days from the date the complaint is received.

¹ Prior to the 2006-2007 fiscal year, the City participated in the Urban County CDBG program. The Orange County Housing and Community Services Department was responsible for preparing Consolidated/ Annual Action plans and accomplishment reports on behalf of San Clemente therefore some pre-2006-2007 CDBG records may not be in the custody of the City. When necessary, a reasonable effort will be made to obtain copies of related documents from the County.

USE OF THE CITIZEN PARTICIPATION PLAN

The City will comply with the process and policies established in the City Council-adopted Citizen Participation Plan when administering CDBG funds. Amendments to the Citizen Participation Plan will be subject to the substantial amendment requirements outlined in this document.

JURISDICTION'S RESPONSIBILITY

The requirements for the Citizen Participation Plan will not restrict the responsibility or authority of the City in the development and execution of the Consolidated Plan.

CITIZEN PARTICIPATION PLAN AMENDMENTS FOR DISASTERS & EMERGENCIES

In the event of a local, state, or national disaster, it may be necessary to rapidly deploy existing or new funding resources allocated to the City by HUD. In these emergency situations, the Citizen Participation process may be streamlined to reduce delays in accessing grant funds pursuant to notices, waivers, award letters, or other HUD directives. Rapid deployment of HUD resources may require the substantial amendment to the Consolidated Plan and/or Annual Action Plan(s).

CORONAVIRUS AID, RELIEF, AND ECONOMIC SECURITY ACT OF 2020

Pursuant the Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act), and regulatory waivers authorized by the U.S. Assistant Secretary of Housing and Urban Development for Community Planning and Development, on March 31, 2020, the City of San Clemente will implement the following regulatory relief waivers related to Citizen Participation:

- 1. Citizen Participation Public Comment Period for Consolidated Plan Amendment:**
The 30-day public comment period is waived for substantial amendments to no fewer than five (5) days. This waiver will apply to the Consolidated Plan, Annual Action Plans, and other CARES Act related funding or program modifications.
- 2. Reasonable Notice and Opportunity to Comment:**
The Citizen Participation Plan sets forth the requirements for reasonable notice and opportunity for the public to comment. In an effort to contain COVID-19 by limiting public gatherings, and to respond quickly to the growing spread and effects of COVID-19, reasonable notice and opportunities to comment are amended as follows:
 - Reasonable Notice: Related notice(s) will be posted on the City's website - www.san-clemente.org, social media, and in the Public Notice display case located at the entrance of the City of San Clemente City Hall. The notice will be

prominent and will provide a summary of the proposed amendment, information regarding the opportunity to provide comment, and information on how to view or obtain a copy of the draft amendment.

- Opportunity to Comment: Members of the public are invited to review the draft amendment and provide written comments. The public notice will provide an email address where written comments can be submitted. City staff will provide a written response to public comments received during the comment period. A summary of written comments received during the comment period, and Staff responses will be incorporated into the amendment that is submitted to HUD at the conclusion of the comment period.
- Public Hearing: On or soon after day five (5) of the comment period, the City Council will hold a hearing. The public can listen to the meeting via live stream from the City's YouTube channel at www.san-clemente.org/live or live on Cox Communications Local Access Channel 854. Members of the public can submit comments to Council electronically. Material may be emailed to Campagnolol@san-clemente.org. Transmittal by 4:00 p.m. on Council meeting days is recommended. Comments must indicate by item title or number the agenda item to which they apply. Additional instructions will be listed on the City's website. Public comments will be summarized and incorporated into the final amendment that is submitted to HUD.

City staff will submit the subject amendment(s) to the HUD in a timely manner. This waiver will apply to the Consolidated Plan, Annual Action Plans, and other CARES Act related funding or program modifications. This waiver will be applicable through June 30, 2021, or as otherwise directed by HUD.

CERTIFICATIONS

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

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

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

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

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

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

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

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

Signature of Authorized Official

Date

CITY MANAGER

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

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

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

Signature of Authorized Official

Date

CITY MANAGER

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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