



# AGENDA REPORT

SAN CLEMENTE CITY COUNCIL MEETING  
Meeting Date: May 4, 2021

Agenda 7B  
Approval \_\_\_\_\_  
City EP 18  
Dept. CDB  
Attorney \_\_\_\_\_  
Finance JW

**Department:** Community Development Department  
**Prepared By:** Gabriel Perez, City Planner

**Subject:** *ADOPTION OF THE DRAFT 2021-2022 ANNUAL ACTION PLAN FOR EXPENDITURES OF COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS.*

**Fiscal Impact:** Yes. The Annual Action Plan will have a positive fiscal effect by adding \$324,749 of Community Development Block Grant (CDBG) funds to the Miscellaneous Grant Fund.

**Summary:** Staff recommends that Council approve and adopt the draft 2021-2022 Annual Action Plan required by U.S. Department of Housing and Urban Development (HUD). The purpose of the Annual Action Plan is to receive the City's allocated CDBG funds and provide community development project details in connection with the City's CDBG Grant.

**Background:** Each year, the U.S. Department of Housing and Urban Development (HUD) determines the amount of CDBG funds the City is entitled to receive based on various community factors such as population, household income, and housing stock condition. In order to receive CDBG funds directly from HUD, the City must adopt an Annual Action Plan that lists eligible projects and activities to be carried out during the fiscal year with CDBG funds. This year, the City will be receiving a CDBG allocation of \$324,749, which is \$31,305 less than the City's current year CDBG allocation. Staff has also identified \$168,795 in prior year, uncommitted CDBG funds that will be available for programming in FY 2021-22. Finally, program income received during the year will be available to fund eligible housing rehabilitation activities.

HUD regulations require that the draft Annual Action Plan be available for public review for a 30-day period. The City is also required to hold a public hearing to obtain resident comments regarding the draft Annual Action Plan and proposed use of CDBG funds. A notice was published in the *Orange County Register* on April 3, 2021, announcing the 30-day comment period and the May 4, 2021, public hearing. The required comment period commenced on April 4, 2021, and will end on May 4, 2021.

**Discussion:** All recipients of CDBG funds are required to prepare a Consolidated Plan. The Consolidated Plan identifies a jurisdiction's overall housing and community development needs and outlines specific goals and objectives that will guide a city's CDBG funding priorities over a multi-year period. The City Council adopted the current Consolidated Plan in May 2020. According to the City's 2020-2024 Consolidated Plan, CDBG funding priorities fall into four general categories: 1) public

improvements, 2) housing and commercial rehabilitation, 3) public services, and 4) program administration.

### 1. Public Improvements

In 2013, property owners and residents from the Downtown CDBG target area were invited to a public workshop to review maps, listen to neighborhood issues, and discuss traffic calming options. This strategic planning process confirmed that sidewalk and street improvements within CDBG target areas was a community priority. Consequently, for the past five years, the City Council has directed CDBG funding toward the installation of sidewalks and other residential street improvements.

For the past three years CDBG funding has been allocated to undertake sidewalk improvements for Avenida Palizada and Avenida Cabrillo. For FY 2021-22, \$290,820 has been allocated to continue a sidewalk improvement project for Avenida Cabrillo between El Camino Real and Calle Seville that will include construction of sidewalks, curbs and gutter, and ADA ramps.

### 2. Housing and Commercial Rehabilitation

Since 1994, the City has provided eligible property owners with Home Rehabilitation Program loans, and since 2004 the City has provided Commercial Facade Rehabilitation Program grants to eligible commercial property owners. Residential improvement loan proceeds are primarily utilized to address housing and building code deficiencies and deferred property improvements. The maximum loan amount is \$25,000. The loan carries zero percent interest, with repayment deferred until the sale or transfer of the property. Loan repayment proceeds are recycled into additional home rehabilitation loans (i.e., program income). The typical commercial rehabilitation grant is utilized to design and install new business signs or awnings. The maximum grant is \$2,000. Grants are limited to businesses that serve residents of CDBG-eligible areas.

The 2021-2022 Annual Action Plan allocates \$77,062 in CDBG funds, plus program income received during the year, for the Housing Rehabilitation Loan Program. It is anticipated that three owner-occupied housing units will be rehabilitated during the year. Twelve thousand dollars (\$12,000) is allocated for the Commercial Façade Rehabilitation Program to improve signage and façades of local businesses.

### 3. Public Services

The City can allocate up to 15 percent of its annual CDBG grant for Public Services. For FY 2021-22, \$48,712 will be available for public service grants.

In December 2020, local nonprofit organizations serving San Clemente residents were notified of the availability of CDBG public services grant applications via the City's website and mail. Four applications for CDBG funding were received in January 2021, requesting \$75,000. Grant applications were reviewed by the City's Social Service Budget Committee in February; the committee recommended \$48,712 in CDBG funding for the following programs:

1. Camino Health Center - \$15,508 to assist an estimated 2,600 residents with low-cost medical and pediatric dental services.
2. Family Assistance Ministry - \$15,508 to assist an estimated 280 individuals, that are at risk of becoming homeless or that are homeless, with an array of housing and support services.
3. Fun on the Run (City of San Clemente) - \$8,574 to offset the cost of after school recreation services for an estimated 120 low- and moderate-income youths.
4. Laura's House - \$9,122 to assist an estimated 235 victims of domestic violence with housing and supportive services.

4. Administration

The City may allocate up to 20 percent of its annual CDBG grant for Planning and Administration activities. Administrative program costs include funding to pay for fair housing services and City staff and contractual staff time for the overall grant management. Staff oversees the Downtown Revitalization Programs, conducts public outreach and education, administers and monitors the social services grant program, and coordinates with the Engineering Division in setting community priorities for the CDBG target area. Consultants oversee the Home Rehabilitation program, prepare the mandatory reports, and work closely with City Staff. A total of \$64,950 is allocated for CDBG program administration, including \$4,500 for the Fair Housing Foundation, which will provide HUD-required fair housing outreach, education and enforcement services for San Clemente residents.

The Draft 2021-2022 Annual Action Plan provides additional details regarding the activities recommended for CDBG funding. A summary of funding recommendations is provided below.

PROPOSED ACTIVITY	PROPOSED CDBG FUNDING
<b>Public Improvements:</b> Avenida Cabrillo Sidewalk Improvements	\$290,820
<b>Housing Rehabilitation:</b> Housing rehabilitation assistance for owner-occupied & renter-occupied housing **	\$77,062
<b>Commercial Rehabilitation:</b> Façade improvement grants	\$12,000
<b>Public Services:</b> Youth, homeless and other low/mod-income households	\$48,712
<b>CDBG Planning &amp; Administration:</b> Program oversight and coordination, including Fair Housing Counseling	\$64,950
<b>TOTAL:</b>	<b>\$493,544</b>
<b>2021-22 CDBG RESOURCES</b>	
2021-22 CDBG Grant	\$324,749
Prior Year Funds	\$168,795
<b>TOTAL:</b>	<b>\$493,544</b>

\*\* Program income received during FY 2021-22 for housing rehabilitation.

**Recommended**

**Actions:**

STAFF RECOMMENDS THAT the City Council take the following actions:

1. Approve and adopt the Draft 2021-2022 Annual Action Plan for use of Community Development Block Grant Funds.
2. Authorize the City Manager to submit the Annual Action Plan to HUD to execute the HUD contract.
3. Accept grant revenues of \$324,749 from HUD to account #017-000-33712.
4. Authorize a related budget appropriation in the amount of \$324,749 to the CDBG fund for the amounts in the 2021-2022 Action Plan.

**Attachments:**

1. Draft 2021-2022 Annual Action Plan

**Notification:**

The Orange County Register

CITY OF SAN CLEMENTE  
2021-2022  
Annual Action Plan

Draft 4-23-2021

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- Attachment 1: Public Notice of Public Hearing and 30-Day Comment Period
- Attachment 2: CDBG Target Area Map
- Attachment 3: Analysis of Impediments Analysis Summary and Action Plan
- Certifications and SF-424

## Executive Summary

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

#### 1. Introduction

The 2021-2022 Annual Action Plan for the City of 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 low- and moderate-income individuals.

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, or
- Meet a community need having particular urgency, such as a nationally declared disaster.

To receive CDBG funds, the City must prepare a Consolidated Plan. The Consolidated Plan is a multi-year strategic plan that identifies priority housing and community needs. It also identifies the activities the City will implement over five years to priority address needs. The Action Plan, a component of the Consolidated Plan, is the City's annual expenditure plan for using CDBG funds to address the needs identified in the Consolidated Plan.

HUD has announced funding allocations for 2021. The City will receive \$324,749 in 2021 CDBG funding (\$31,305 less than the City's current CDBG grant). The City has also identified \$168,795 in prior year CDBG funds that will be available during FY 2021-2022 to fund eligible activities. Program income received during FY 2021-2022 will be available to fund housing rehabilitation activities.

The 2021-2022 Action Plan details the specific activities the City will undertake with CDBG resources to address the housing and community needs identified in the Consolidated Plan. Planned activities include housing rehabilitation and minor commercial property improvements, public infrastructure improvements, public social services grants, and program administration (including fair housing services).

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

The five-year CDBG program objectives and outcomes identified in the 2020-2024 Consolidated Plan are summarized below. Corresponding proposed outcomes for FY 2021-22 are also provided below:

- Infrastructure and Facility Improvements: Improve public infrastructure and facilities that benefit 7,000 low- and moderate-income residents / FY 21-22 Goal: Year-3 of funding for prior year project (Av Cabrillo Sidewalk) which will benefit 1,810 individuals
- Provide housing rehabilitation assistance to 50 homeowners and 2 rental housing owners / FY 21-22 Goal: 3 owner-occupied and 0 rental unit rehabbed
- Provide access to public social services for 12,500 low- and moderate-income persons / FY 21-22 Goal: 2,720 individuals assisted
- Provide access to housing and supportive services for 2,500 persons at risk of becoming homeless or that are homeless / FY 21-22 Goal: 515 individuals with homelessness prevention assistance, shelter, and support services
- Support activities to promote economic opportunities by assisting 10 businesses that serve lower-income residents / FY 21-22 Goal: 5 businesses
- Provide CDBG program oversight and coordination, including fair housing services to 300 households / FY 21-22 Goal: 1 Year of program admin and 80 households with fair housing services

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

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

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

The participation of residents and community stakeholders in prioritizing the use of CDBG funds is an important component of the Consolidated Plan (and Action Plan) planning process. For the 2021-2022 Action Plan, the City obtained public input in a variety of ways:

- The City's Human Affairs Commission held a meeting on February 9, 2021, to accept public input regarding the allocation of CDBG public service grant funds.
- On April 3, 2021, a notice was published in the local newspaper announcing the required 30-day public comment period for the draft 2021-2022 Annual Action Plan. The notice also announced a public hearing to be held by the City Council.
- On May 4, 2021, the San Clemente City Council held a public hearing to accept additional public input regarding the draft 2021-2022 Annual Action Plan and authorize submission of the plan to HUD.

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

See **Attachment 1**.



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

All comments and views were accepted – none were rejected. See **Attachment 1**.

**7. Summary**

The 2021-2022 Annual Action Plan is the second year of the 2020-2024 Consolidated Plan cycle. The Annual Action Plan is the City's one-year expenditure plan for CDBG funds. HUD has notified the City that it will receive \$324,749 in CDBG funds for FY 2021-2022. An additional \$168,795 in prior year uncommitted CDBG funds, plus program income resources received during the year, will also be available to carry out CDBG-eligible activities. The Action Plan details the City's activities with CDBG funds to support the broader goals and objectives of the Consolidated Plan. Activities planned for funding include housing rehabilitation, public infrastructure improvements, public social services, and program administration, including fair housing services.

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

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

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

5-4-21 / 7B-10

**Table 1 – Responsible Agencies**

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

**Narrative (optional)**

The City's Community Development Department is primarily responsible for administering CDBG funds, including preparing the Consolidated Plan, annual action plans, year-end performance report, and other administrative aspects of the program.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Pursuant to HUD regulations, the City has taken several action steps to obtain residents' and stakeholders' input to develop the 2021-2022 Annual Action Plan. It is important to note that COVID-19 pandemic public safety protocols hampered consultation; nonetheless, the City's Human Affairs Committee and City Council held meetings to obtain public comment on the proposed use of CDBG funds. The City also utilized its internet web page and the newspaper to notify residents of the opportunity to review and comment on the 2021-2022 Annual Action Plan draft.

#### **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), which administers the federal rental assistance voucher and certificate programs. The City has limited resources to assist with the development of housing opportunities. Still, as opportunities evolve, City staff will work with developers to encourage housing development for lower-income residents.

Through the annual CDBG Public Service Grants and City-funded Good Neighbor Grants funding process, City staff can ascertain the services City residents need and develop partnerships with local agencies to coordinate the delivery of needed services.

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

As a participant in the Orange County Continuum of Care (OC CoC) planning process, the City provides information to the OC CoC regarding the activities it will fund to address local homeless issues. The OC CoC uses this information to prepare the region's 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. The City is also a supporter and participant in the biennial Point-In-Time Survey of the region's homeless.

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

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

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

1	<b>Agency/Group/Organization</b>	<b>Orange County Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	PHA Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided information regarding the number and type of households receiving HUD rental assistance
2	<b>Agency/Group/Organization</b>	<b>211 Orange County</b>
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Homeless Management Information System (HMIS) Admin
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regional Continuum of Care coordinator and HMIS administrator. Provided information regarding regional and local homeless populations and shelter resources.
3	<b>Agency/Group/Organization</b>	<b>Fair Housing Foundation</b>
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Impediments to Fair Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency provided data and information that helped identify the needs of lower-income families and individuals requiring fair housing services and provided input regarding the City's strategy to address impediments to fair housing

4	<b>Agency/Group/Organization</b>	Age Well Senior Services
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding the service needs of seniors, including homebound seniors
5	<b>Agency/Group/Organization</b>	Family Assistance Ministries
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding housing and service needs of homeless individuals and households at risk of becoming homeless
6	<b>Agency/Group/Organization</b>	Camino Health Center
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy Needs of Low/Mod persons
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Provided input regarding medical/dental service needs of the community, including homeless individuals
7	<b>Agency/Group/Organization</b>	Laura's House
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency helped identify the needs of homeless women and women with children, including victims of domestic violence
8	<b>Agency/Group/Organization</b>	<b>City of San Clemente</b>
	<b>Agency/Group/Organization Type</b>	Other government – Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Various city departments, committees, and City Council provided data and information. Also played a key role in identifying priorities and recommendations for the allocation of HUD funds.

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

The City made an effort to have an open consultation process. No agency was excluded from the consultation process.

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

**Table 2 – Other local / regional / federal planning efforts**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	211 Orange County	Helped the City establish program goals to address the needs of the San Clemente homeless. Includes regional and local point in time survey, 10-Year Plan to End Homelessness (including Discharge Plan)
City of San Clemente Housing Element	City of San Clemente	Provided housing priorities and program goals
City of San Clemente Capital Improvement Plan	City of San Clemente	Helped to identify priority capital projects that may be CDBG-eligible
5 Yr. & 1 Yr. PHA Plan	Orange County Housing Authority	Identified OCHA resources to address housing needs of lower-income renter householders in the City

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
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

**Narrative (optional)**

**AP-12 Participation – 91.105, 91.200(c)**

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

The City of San Clemente provided several opportunities for public participation throughout the Annual Action Plan preparation process. These opportunities included public meetings, a 30-day public review of the draft Annual Action Plan, and a City Council public hearing. The notice for the required public comment period and public hearing is provided in **Attachment 1** of this plan. Actions are further summarized below:

**Citizen Participation Outreach**

**Table 3 – 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	Non-targeted/broad community	2/9/21 Human Affairs Commission meeting to accept public input on allocation of CDBG public service grant funds	None	NA	NA
2	Newspaper Ad	Non-targeted/broad community	Notice of 30-day public review period (4/5/21 to 5/4/21)	TBD	TBD	NA
3	Public Hearing	Non-targeted/broad community	5/4/21 public hearing	TBD	TBD	NA



## Expected Resources

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

#### Introduction

HUD has notified the City that it will receive \$324,749 in CDBG funds for FY 2021-2022. Additionally, the City identified \$168,795 in prior year CDBG funds that may be available during FY 2021-2022. Program income received during FY 2021-2022 will also be available to fund housing rehabilitation activities. Housing voucher/certificate resources (via OCHA) and Good Neighbor grants (social service grants from the City's General Fund) will also be available to support activities that address the Consolidated Plan's goals.

The City has access to In-lieu Affordable Housing Fee resources; however, no project has been identified to use these funds.

#### Priority Table

Table 4 - Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2			Expected Amount Available Remainder of ConPlan \$	Narrative Description	
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$			Total: \$
CDBG	public – federal	Acquisition Admin & Planning Economic Development Housing Public Improvements Public Services	324,749		168,795	493,544	900,000	Annual CDBG allocation from HUD, program income, and prior-year funds

**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; consequently, local resources supporting Consolidated Plan strategies are limited. 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 January 2021, 141 San Clement households receive rental assistance. It is anticipated that 150 households will be assisted annually during the five-year Consolidated Plan programming cycle.
- On an annual basis, the City allocates approximately \$50,000 in General Fund resources to support various social service programs in the community, i.e., Good Neighbor Funding. Several services are funded with these resources, including funding for homelessness prevention, interim housing for homeless families with children, and senior and youth services.
- 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 to provide long-term affordable housing. The City adopted the IHP 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. Past 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 in the City is complete and as the City approaches build-out.

CDBG does not require matching funds.

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

As indicated in the Consolidated Plan, San Clemente is nearly "built out" with limited vacant land; nonetheless, the City's Housing Element identifies several vacant and underutilized sites that may be suitable for housing development. Nearly all vacant residential sites are small, infill

parcels located west of Interstate 5. Most parcels identified in the Housing Element residential sites inventory are in the City's Affordable Housing Overlay. The Overlay Zone intends to encourage affordable rental and sale housing in commercial and mixed-use zones.

### **Discussion**

Funding resources to implement the City's 2021-2022 Annual Action Plan are limited. The City will receive \$324,749 in 2021 CDBG funding from HUD. This amount is \$31,305 less than the City's 2020 CDBG allocation. An additional \$168,795 in uncommitted prior-year CDBG resources is available in FY 2021-2022. CDBG-funded housing rehabilitation loan repayments (i.e., Revolving Loan Funds) will provide the City with an additional resource for housing rehabilitation programs.

OCHA has aggressively pursued new rental assistance resources - the City will continue to support OCHA's efforts to secure these resources. Additionally, the City will continue to support programs serving City residents with Good Neighbor social service grants for the foreseeable future. Finally, the City has identified vacant and underutilized land that may be suitable housing development - in-lieu fees for affordable housing development are available to support affordable housing activities. No projects are slated for development utilizing these resources.

## Annual Goals and Objectives

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

#### Goals Summary Information

Table 5 – Goals Summary

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: \$290,820	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1,810 Persons Assisted
2	Housing Preservation	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$77,062	Homeowner Housing Rehabilitated: 3 Household Housing Unit
3	Public Social Services	2020	2024	Non-Homeless Special Needs Low & Moderate-income Households	Citywide	Public Services	CDBG: \$24,082	Public service activities other than Low/Moderate Income Housing Benefit: 2,720 Persons Assisted
4	Homeless Continuum of Care	2020	2024	Homeless	Citywide	Homeless Support Services and Housing	CDBG: \$24,630	Public service activities other than Low/Moderate Income Housing Benefit: 219 Persons Assisted
								Homeless Person Overnight Shelter:

City of San Clemente 2021-2022 Annual Action Plan

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
								16 Persons Assisted Homelessness Prevention: 280 Persons Assisted 5-4-21 / 7B-21
5	Economic Opportunities	2021	2024	Non-Housing Community Development	CDBG Census Tracts	Economic Development	CDBG: \$12,000	Businesses assisted: 5 Businesses Assisted
6	Program Administration	2020	2024	Administration	Citywide	Administration and Planning	CDBG: \$64,950	Other: 80 Other

**Goal Descriptions**

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

5	<table border="1"> <tr> <td data-bbox="1356 268 1424 493">Goal Name</td> <td data-bbox="1356 493 1424 1598">Economic Opportunities</td> </tr> <tr> <td data-bbox="1291 268 1356 493">Goal Description</td> <td data-bbox="1291 493 1356 1598">Grants and other forms of assistance to improve or expand for local businesses</td> </tr> </table>	Goal Name	Economic Opportunities	Goal Description	Grants and other forms of assistance to improve or expand for local businesses
Goal Name	Economic Opportunities				
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6	<table border="1"> <tr> <td data-bbox="1226 268 1291 493">Goal Name</td> <td data-bbox="1226 493 1291 1598">Program Administration</td> </tr> <tr> <td data-bbox="1120 268 1226 493">Goal Description</td> <td data-bbox="1120 493 1226 1598">Provide for administration and planning activities to address needs identified in the Consolidated Plan, including services to address impediments to fair housing</td> </tr> </table>	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
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 91.215(b):**

The City of San Clemente is not a recipient of HOME funds; however, CDBG resources will use program income funds received during the year to assist with rehabilitating residential housing units. It is projected that three lower-income homeowners will be assisted with CDBG resources during FY 2021-2022.

## AP-35 Projects – 91.220(d)

### Introduction

The following activities have been allocated CDBG funds for FY 2021-2022.

Table 6 – Project Information

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

### 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 program income (i.e., funds generated by the repayment of housing rehabilitation loans) to help homeowners improve their residences and not 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.



## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 7 – Project Summary

<b>1</b>	<b>Project Name</b>	<b>Single-Family Housing Rehabilitation Program</b>
	Target Area	Citywide
	Goals Supported	Owner-occupied Housing Rehabilitation
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$77,062
	Description	CDBG funded housing rehabilitation loans or grants for eligible homeowners
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	3 owner-occupied housing units
	Location Description	Citywide
	Planned Activities	CDBG funds (\$77,062 in 2021 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
<b>2</b>	<b>Project Name</b>	<b>Camino Health Center</b>
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services

City of San Clemente 2021-2022 Annual Action Plan



<b>Funding</b>	CDBG: \$15,508
<b>Description</b>	Low cost medical and pediatric dental services for low- and moderate-income persons
<b>Target Date</b>	6/30/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2,600 low- and moderate-income persons
<b>Location Description</b>	1031 Avenida Pico, Ste. 104, San Clemente CA
<b>Planned Activities</b>	Primary medical care and pediatric dental services at a reduced cost for lower-income persons and indigents
<b>3</b>	<b>Family Assistance Ministries</b>
<b>Target Area</b>	Citywide
<b>Goals Supported</b>	Homeless Services
<b>Needs Addressed</b>	Public Services
<b>Funding</b>	CDBG: \$15,508
<b>Description</b>	Housing assistance, support services, and case management for households that are at risk of homelessness and those that are homeless
<b>Target Date</b>	6/30/2022
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	280 low- and moderate-income persons
<b>Location Description</b>	Citywide
<b>Planned Activities</b>	Rent and utility assistance, supportive service, and case management for households at risk of homelessness and those that are homeless

<b>4</b>	
<b>Project Name</b>	<b>Fun On The Run</b>
Target Area	Citywide
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$8,574
Description	Youth recreation program
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	An estimated 120 youths
Location Description	Citywide
Planned Activities	After school recreation and homework assistance program with a focus on low- and moderate-income children
<b>5</b>	
<b>Project Name</b>	<b>Laura's House</b>
Target Area	Citywide
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$9,122
Description	Shelter, counseling, and support services for victims of domestic violence
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	235 individuals that are victims of domestic violence (Emergency Shelter - 4, Transitional Housing -12, and Counseling/Hotline – 219)

Location Description	Citywide
Planned Activities	Shelter, counseling, and support services for victims of domestic violence
<b>6</b>	<b>Fair Housing Foundation</b>
Target Area	Citywide
Goals Supported	Fair Housing Services
Needs Addressed	Administration
Funding	CDBG: \$4,500
Description	Fair housing outreach, education, and enforcement services to reduce and eliminate impediments to the fair access of housing
Target Date	6/30/2022
Estimate the number and type of families that will benefit from the proposed activities	80 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
<b>7</b>	<b>CDBG Program Administration</b>
Target Area	Citywide
Goals Supported	Program Administration
Needs Addressed	Administration
Funding	CDBG: \$60,450
Description	CDBG program oversight and coordination

	Target Date	6/30/2022
	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
8	Project Name	Capital Project: Avenida Cabrillo Sidewalks (Year 3)
	Target Area	CDBG census tracts
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Improvements
	Funding	CDBG: \$290,820
	Description	Installation of missing and replacement of deteriorated sidewalks
	Target Date	06/30/2022
	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 El Camino Real and Calle Seville
	Planned Activities	Installation of missing and replacement of deteriorated sidewalks, curb and gutter, retaining wall and ADA ramps, and related activities
9	Project Name	Business Sign and Façade Improvement Grants
	Target Area	CDBG census tracts
	Goals Supported	Economic Opportunities

Needs Addressed	Economic Development
Funding	CDBG: \$12,000
Description	Grants to update or upgrade business signs or facades
Target Date	06/30/2022
Estimate the number and type of families that will benefit from the proposed activities	Up to 5 business to be assisted
Location Description	To be determined but located within CDBG-eligible Census Tract Block Groups
Planned Activities	Grants to business owners to update or upgrade business signs and/or other minor building facades 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 contribute 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 can assist elderly homeowners in undertaking improvements to their residences to address specific household needs. 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

Most activities slated for CDBG-funding during FY 2021-2022 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 in **Attachment 2**.

### Geographic Distribution

Table 8 - Geographic Distribution

Target Area	Percentage of Funds
CDBG census tracts	61
Citywide	39

### Rationale for the priorities for allocating investments geographically

Funding is principally allocated on a citywide basis. The City's primary intent is to serve lower-income residents who need housing or services regardless of where they live in the City. Area-wide activities (e.g., public improvements) are typically limited to the City's CDBG-eligible areas.

### Discussion

The City's primary intent is to use CDBG funds to assist eligible households that need services regardless of where they live in the City. A portion of funds will be focused in specific areas of the City with a large percentage of low- and moderate-income residents.

## Affordable Housing

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

#### Introduction

The City will utilize limited CDBG funds and program income to provide housing rehabilitation loans and grants to eligible homeowners.

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	3
Special-Needs	0
<b>Total</b>	<b>3</b>

**Table 10 - One Year Goals for Affordable Housing by Support Type**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	0
<b>Total</b>	<b>3</b>

#### Discussion

The City will utilize CDBG program income (Revolving Loan funds) to assist with the rehabilitation of owner-occupied housing units. While it is not the program's primary focus, some special-needs households (senior and disabled) may be assisted during the year by the program. The City will also continue to support OCHA's program activities in the community. An estimated 140 households will receive rental assistance vouchers or certificates during FY 2021-2022. CDBG funding will also be allocated to provide various housing options and services for households at risk of becoming homeless and homeless (homelessness prevention 280 individuals, emergency shelter four individuals, transitional housing 12 individuals).

## **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 Consolidated 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 various 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 CARES Act of 2020 provided the City with the opportunity to invest significant CDBG resources to engage the homeless, specifically, the chronically homeless. No new CDBG resources will be allocated for homeless outreach services in FY 2021-2022 since CDBG-CV resources remain available for this purpose. The City of San Clemente will also continue to support agencies that work directly with sheltered and unsheltered homeless populations. Agencies such as Family Assistance Ministries conduct extensive outreach and vulnerability assessments throughout San Clemente and neighboring communities. Other agencies conduct similar outreach and assessment services for specific homeless populations such as domestic violence victims 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 San Clemente. These shelter beds are earmarked for homeless families with children. Additionally, Laura's House offers shelter for victims of domestic violence. For FY 2021-2022, CDBG funding is allocated to support Laura's House housing programs for individuals escaping domestic violence. It is projected that 16 individuals will be assisted with CDBG-funded emergency shelter and 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. The 2019 PITS indicates 35 permanent supportive scattered-site shelter beds in San Clemente and 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's efforts to seek resources to address regional homeless issues and support OCHA's efforts to obtain additional housing assistance vouchers for homeless Veterans (VASH). OCHA reports that in January 2021, five veteran households benefit from VASH housing assistance in San Clemente. Additionally, five individuals are receiving rental assistance via the Shelter Plus Care program. This program provides rental subsidies and supportive services to individuals that have experienced homelessness.

**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 2021-2022 CDBG funding to provide crisis intervention and counseling services for domestic violence victims 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. The City's CDBG funds are allocated for safety net services to 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 discussed in the Consolidated 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 seek other private and public funding sources to reduce these units' development costs. To the extent that resources are available, Inclusionary Housing In-lieu Funds may be made available to assist nonprofit agencies purchasing land or existing housing units to provide 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 to obtain 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 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 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 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 Consolidated Plan.

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

The City will allocate a portion of CDBG funds for activities that address the lower-income and special needs households' service needs. 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 improving their residences and address specific household needs.

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

San Clemente has identified actions it will take during FY 2021-2022 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. No new CDBG funding is allocated for the program for FY 2021-2022; however, program income received during the year may be available to assist with housing rehabilitation.

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

The City will ensure federal lead-based paint regulations compliance. 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 lead hazards in compliance with current regulations.

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

As previously outlined, approximately 5.3% of the City's population live below the poverty level, including 3.6% of children under 18 and 5.1% of seniors (age 65 and older). During FY 2021-2022, the City will fund the following activities to reduce 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
- Commercial property upgrades to improve neighborhood aesthetics and expand economic opportunities for lower-income residents.

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

The City has made an effort to establish an institutional structure to 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 to prepare the County's Continuum of Care Homeless Assistance grant application to HUD. The City will also continue to assist OCHA in implementing its Five-year Public Housing Authority (PHA) Plan to provide 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 highlighting its mission, goals, and objectives related to public and assisted housing programs. The City will review OCHA's plans and 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 relationships with local nonprofit social service providers help promote efficient and effective use of limited private and public resources to address the community's service needs.

### **Discussion**

HUD-funded grant recipients are required under various laws not to discriminate in housing or services directly or indirectly based on race, color, religion, sex, national origin, age, familial status, or disability. Grant recipients such as San Clemente are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choices for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, national origin, and other personal or familial attributes; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act. HUD encourages jurisdictions to consult with one another and initiate region-wide area fair housing planning. The **Analysis of Impediments (AI) to Fair Housing Choice** is the primary document utilized for this purpose. In addition to identifying impediments, a strategy to overcome barriers must be developed and implemented - accomplishments are reported annually. The City participated in developing a county-wide AI, which the City Council adopted in May 2020. A summary of impediments to fair housing and the action steps the City will take during FY 2021-2022 are found in **Attachment 3**.

## Program Specific Requirements

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

#### Introduction

Each HUD program that is covered by the Consolidated Plan regulations must address certain program-specific requirements.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

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

#### Discussion

The City will meet the 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.

## SUMMARY OF PUBLIC COMMENTS

### 30-DAY COMMENT PERIOD

To be provided at the conclusion of the comment period.

### MAY 4, 2021, PUBLIC HEARING

To be provided at the conclusion of the public hearing.

**PUBLIC NOTICE**

**NOTICE IS HEREBY GIVEN THAT A PUBLIC HEARING WILL BE HELD BY THE CITY COUNCIL OF THE CITY OF SAN CLEMENTE, CALIFORNIA, ON THE PROPOSED SUBMISSION OF THE 2021-2022 ANNUAL ACTION PLAN AND THE COMMENCEMENT OF THE THIRTY (30) DAY COMMENT PERIOD 4/5/21 – 5/4/21**

NOTICE IS HEREBY GIVEN that the City of San Clemente City Council will hold a public hearing and public comment period for the Action Plan for Fiscal Year 2021-2022. 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 multi-year strategic plan that identifies housing and community priority needs, strategies to address priority 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 current 2020-2024 Consolidated Plan was approved by the San Clemente City Council in May 2020. The draft 2021-2022 Annual Action Plan is available for public review.

**30-Day Public Comment Period**

The required 30-day public comment period for the 2021-2022 Annual Action Plan will commence April 5, 2021, and will end May 4, 2021. The draft document will be available for public review during regular business hours at City Hall at the Community Development Department at 910 Calle Negocio and on the City’s web site at <https://www.san-clemente.org>. Written comments may be submitted to Gabriel Perez, City Planner at 910 Calle Negocio, San Clemente, 92673, or [perezg@san-clemente.org](mailto:perezg@san-clemente.org) on or before noon May 4, 2021.

**2021-2022 Action Plan**

The City anticipates it will receive an allocation of \$324,749 in CDBG funds for Fiscal Year 2021-2022. Prior year unused funds (\$168,795) will also be available. Once CDBG grants are announced by HUD, proposed CDBG allocations will be increased or decreased by a uniform percentage based on the final grant amount or as otherwise directed by the City Council.

The proposed use of CDBG funds includes the following:

<b><u>Proposed Activity</u></b>	<b><u>Proposed CDBG Allocation</u></b>
▪ Public social services for lower income persons, seniors, homeless and youths	\$48,700
▪ Capital Improvements	\$670,714
▪ Program administration (including Fair Housing services)	\$64,950

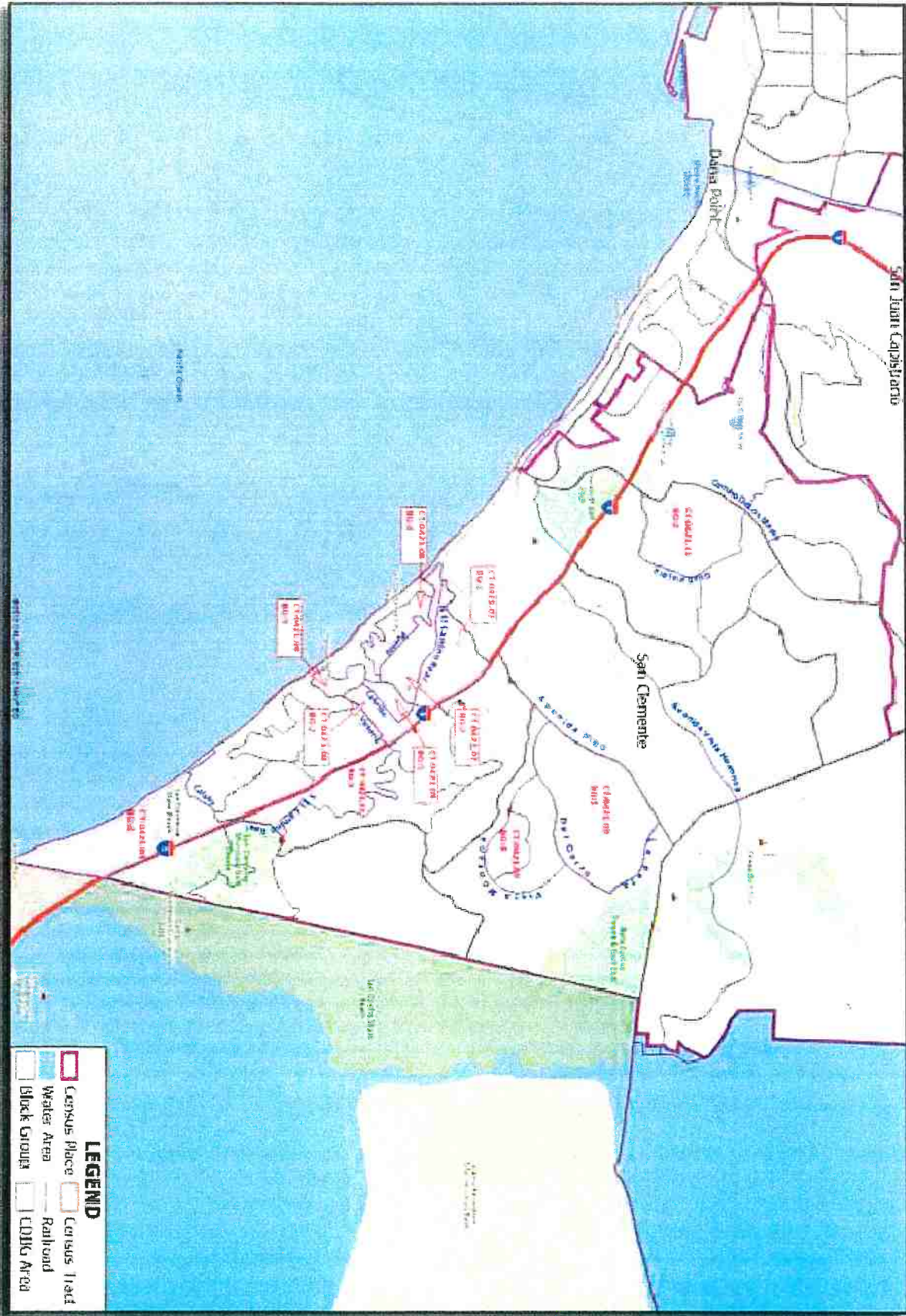
**2021-2022 Action Plan Public Hearing**

NOTICE IS FURTHER GIVEN that said public hearing will be held at the meeting of the City Council on May 4, 2021 at 6:00 pm via teleconference and in person at the Community Center, located at 100 Avenida Seville, San Clemente. To participate, citizens may:

1. View the meeting via live stream from the City’s YouTube channel at [www.san-clemente.org/live](http://www.san-clemente.org/live) or live on Cox Communications Local Access Channel 854; and
2. Provide comments in person at the Council Meeting, which will take place in the Community Center Auditorium, located at 100 Avenida Seville, San Clemente.

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





**ORANGE COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**  
**August 6, 2020**

**REGIONAL PROPOSED AI GOALS AND STRATEGIES**

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

*Goal 1: Increase the supply of affordable housing in high opportunity areas.<sup>1</sup>*

Strategies:

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

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

Strategies:

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

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

Strategies:

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

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

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

**Strategies:**

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

*Goal 5: Expand access to opportunity for protected classes.*

**Strategies:**

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

**CITY OF SAN CLEMENTE PROPOSED AI GOALS AND STRATEGIES**

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



- c) Provide general fair housing counseling and referrals services to address tenant-landlord issues, and investigate allegations of fair housing discrimination and take appropriate actions to conciliate cases or refer to appropriate authorities.
  - d) Periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements.
  - e) Include testing/audits within the scope of work with fair housing provider.
- 3) Support local eviction prevention strategies to reduce the number of homeless individuals and families (homelessness prevention services).
  - 4) Prepare a new Housing Element that is compliant with all current State laws and is certified by the California Department of Housing and Community Development.
  - 5) Update zoning ordinance to comply with current State law.
  - 6) Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities by facilitating affordable housing throughout the community through 1) flexible development standards; 2) density bonuses; and 3) other zoning tools.
  - 7) Review the type and effectiveness of current affordable housing development incentives, and amend/augment as may be necessary to increase the production of affordable housing units.