

# Executive Summary

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

### 1. Introduction

The City of Orange qualifies as an Entitlement Jurisdiction for Community Development Block Grant (CDBG) funds and a Participating Jurisdiction for HOME Investment Partnerships (HOME) funds. The U.S. Department of Housing and Urban Development (HUD) allocates these funds to the City annually. The FY 2021-22 Action Plan is the second Annual Action Plan of the 2020-2024 Consolidated Plan and provides a concise summary of the actions, activities, and the specific federal and other resources that will be used to address the priority needs identified by the Consolidated Plan.

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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Orange conducted community needs assessment during the preparation of the five-year strategic plan (The 2020-2024 Consolidated Plan) and identified the following high priority needs:

- Increase the supply of affordable housing through rental assistance, new construction, and acquisition/rehabilitation projects.
- Provide fair housing for all economic segments and special needs households.
- Continue to financially support homeless facilities and agencies that address service needs of the homeless and those at risk of becoming homeless.
- Improve the quality of existing community services, facilities, and infrastructure to serve low and moderate income neighborhoods.

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City and the CDBG program committee considered the past performance of the CDBG subrecipients when determining the allocation of CDBG funds to proposed FY 2021-22 activities. The CDBG program committee considered funding requests from nonprofit organizations based upon the proposed benefit to low and moderate income residents, their experience in carrying out the proposed activities and meeting the CDBG requirements. CDBG funding was allocated only to activities that address the high priority needs of the 2020-2024 Consolidated Plan.

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

Summary from citizen participation section of plan.

The City advertised the availability of CDBG funds in September 2020, held six public meetings in September, October, December, 2020, and March, April and May 2021, solicited input from nonprofit organizations, and encouraged residents to participate in the preparation of the FY 2021-22 Action Plan.

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

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The 30-day public review period for the Draft Action Plan started Thursday, February 11, 2021 through Thursday, March 11, 2021. No public comments were received during the public review period. The City conducted another 30-day public review period for the Draft Action Plan from March 18, 2021 to April 18, 2021 due to a timing error with the online noticing for the March 3 CDBG Program Committee public hearing meeting. The purpose of the second round of public review process and the April 20 CDBG Program Committee public hearing is to ensure the City has collected public input on the Draft Action Plan, particularly the Draft CDBG and HOME funding recommendations.

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

No comments or views were received.

#### **7. Summary**

The City allocated the CDBG funds to primarily benefit low and moderate income households. The CDBG beneficiaries are either income-qualified residents that receive direct services or residents of neighborhoods where at least 51 percent of the population is low and moderate Income.

The City received the following amounts for FY 2021-22:

1. CDBG - \$1,146,270
2. HOME - \$457,125

See Section AP-35 Projects for a detailed description of each activity. Below is a summary of the CDBG activities and allocations:

- Program Administration - \$229,070 in CDBG funds for program administration and fair housing activities.
- Public Facilities – \$745,260 in CDBG funds for street improvements and public facilities projects.

- Public Services – about \$171,940 in CDBG funds for public services activities.

Regarding the HOME funds, the City has not identified an eligible housing project. The City plans to allocate the HOME funds to an affordable housing project after it identifies an eligible housing project. Allocation of the HOME funds to proposed projects requires City Council approval and amendments to the FY2021-22 Action Plan.

**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.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	ORANGE	Community Development Department
HOME Administrator	ORANGE	Community Development Department

**Table 1 – Responsible Agencies**

**Narrative (optional)**

**Consolidated Plan Public Contact Information**

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

### **1. Introduction**

The City advertised the availability of CDBG funds, solicited input from nonprofit agencies, and encouraged residents to participate in the development of the FY 2021-22 Action Plan through a variety of methods. This included publishing an ad in the *Orange City News*, announcing it on the City's website and social media platforms, and notifying local nonprofit agencies by email.

#### **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 maintains a strong relationship with the assisted housing providers. Staff maintains a close working relationship with the Orange County Housing Authority. The City is home to a regional healthcare cluster including UC Irvine Medical Center, Children's Hospital of Orange County (CHOC), and St. Joseph Hospital of Orange. Ensuring access to quality medical care is an important priority for our assisted housing providers. The City also supported the Orange County's Mental Health Agency efforts in setting up a mental health facility in Orange to serve low income populations faced with mental health issues.

#### **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.**

The County of Orange is the lead agency coordinating Continuum of Care for the entire county. The City of Orange supports the County of Orange's efforts to develop effective programs to address the needs of homeless persons, including the 10-Year Plan to End Homelessness. The City supports the Orange County Housing Authority's (OCHA's) applications for a variety of programs to address needs of the homeless and those at risk of homelessness.

#### **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 of Orange is not a recipient of ESG funds.

### **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**

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

1	<b>Agency/Group/Organization</b>	Assistance League of Orange
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health
	<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>	
2	<b>Agency/Group/Organization</b>	Friendly Center, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
3	<b>Agency/Group/Organization</b>	Fair Housing Foundation
	<b>Agency/Group/Organization Type</b>	Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

4	<b>Agency/Group/Organization</b>	Orange County Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
5	<b>Agency/Group/Organization</b>	HomeAid Orange County
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
6	<b>Agency/Group/Organization</b>	MOMS Orange County
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consulted the appropriate agencies for the development of the FY 2021-22 Action Plan through holding a series of workshops and public hearings before the CDBG Committee and the City Council. The outcome of these consultations is the proposed activities for funding with FY2020-21 CDBG funds.

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

The City consulted all the agencies.

**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	County of Orange	The City collaborates with the County of Orange to implement strategic goals and policies under the Continuum of Care.

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

**Narrative (optional)**



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

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

The City advertised the availability of CDBG and HOME funds, held public meetings, solicited input from nonprofit agencies, and encouraged residents to participate in the development of the FY 2021-22 Action Plan through a variety of methods. The feedback received through this process was considered when setting program goals.

**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	Newspaper Ad	Non-targeted/broad community nonprofits and city departments	Notice of Funding Availability was published in Orange City News and the City's web site and announced on the City's social media platforms.	N/A	N/A	N/A

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)
2	Email	nonprofits and city departments	Notices for the September 28, 2020 CDBG workshop meeting were emailed to 20 nonprofit agencies on the City' CDBG Program interest list.	N/A	N/A	N/A
3	Public Meeting	Non-targeted/broad community nonprofit agencies and city departments	The City held a virtual public workshop on September 28, 2020 with representatives from nonprofit agencies to discuss the application process and requirements.	Agencies in attendance discussed programs, projects and community needs.	N/A	N/A

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 Hearing	Non-targeted/broad community nonprofit agencies and city departments	The CDBG Program Committee held a public hearing on October 14, 2020 to hold a needs hearing and receive presentation on the project/program proposals by nonprofit agencies and various city departments.	The nonprofit agencies and city departments described how the proposed programs and projects would address the needs of low income Orange residents.	N/A	
5	Public Hearing	Non-targeted/broad community nonprofit agencies and city departments	The CDBG Program Committee held a public hearing on December 2, 2020 to review proposals and ask question from the nonprofits and various city departments.	The nonprofit agencies and city departments described how the proposed programs and projects would address the needs of low income Orange residents.	N/A	

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)
6	Public Hearing	Non-targeted/broad community nonprofit agencies and city departments	The CDBG Program Committee met on March 3, 2021 to discuss the Annual Action Plan goals and made a motion to recommend that the City Council approve the FY2021-22 draft funding recommendations. The CDBG Program Committee met again on April 20, 2021 to ensure the opportunity for the public to make comments on the FY2021-22 draft funding recommendations and unanimously recommended that the City Council approve the Draft Funding Recommendations.	No public comments were received at the public hearing.	N/A	N/A

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)
7	Public Hearing	Non-targeted/broad community nonprofit agencies and city departments	The City Council held a public hearing on May 11, 2021 to approve the FY2021-22 draft funding recommendations.	No public comments were received at the public hearing.	N/A	N/A

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

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. The City allocates CDBG funds for a variety of activities including fair housing services, transitional housing, and street improvements.

Eligible activities under the HOME Program include acquisition, rehabilitation, homebuyer assistance, and rental assistance. The City allocates HOME funds for the acquisition, rehabilitation, or development of affordable rental housing.

The City may access federal, State, and local resources to achieve its housing and community development priorities. Specific funding sources will be used based on the opportunities and constraints of each particular project or program. The City will focus its resources and efforts on a variety of activities, and leverage federal and local funds to maximize the number of households that can be assisted. The uses of funds shown in the following table are potential uses. The City does not allocate its CDBG or HOME funds to all of the categories listed.

## 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	1,146,270	0	35,000	1,181,270	3,438,810	The City allocates CDBG funds for a variety of activities including fair housing services, street improvements, and public services.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	457,125	0	0	457,125	1,371,375	The City allocates HOME funds for the acquisition, rehabilitation, or development of affordable rental housing.

Table 5 - Expected Resources – Priority Table

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

The City's primary funding sources are CDBG and HOME funds. Other sources of competitive funding may be available to address housing and community development needs. Low and Moderate Income Housing Asset Funds from the former Redevelopment Agency might be available to provide the required match. However, this funding is very limited.



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

**Discussion**

AP-35 lists all of the FY 2021-22 Community Development Block Grant projects.

## 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	Affordable Housing	2020	2024	Affordable Housing			CDBG: \$0 HOME: \$0	
2	Homelessness	2020	2024	Homeless			CDBG: \$0 HOME: \$0	
3	Community Development	2020	2024	Non-Housing Community Development		Community Development	CDBG: \$1,146,270 HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 61730 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 40796 Persons Assisted

Table 6 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	No FY 21-22 CDBG funds will be allocated to the Affordable Housing goal.
2	<b>Goal Name</b>	Homelessness
	<b>Goal Description</b>	No FY 21-22 CDBG funds will be allocated to homeless shelters.
3	<b>Goal Name</b>	Community Development
	<b>Goal Description</b>	All of the FY 21-22 CDBG funds (\$1,146,270) will be allocated to public services and public facilities.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The FY 2021-22 Action Plan identifies priority housing and community development activities that will be undertaken to provide community services, public facilities, and decent, affordable housing to address the needs of low and moderate income Orange residents.

#### Projects

#	Project Name
1	CDBG Administration
2	Orange Fair Housing Program
3	ADA Wheelchair Access Ramps
4	Beverly Neighborhood Street Rehabilitation
5	Library ADA Improvement - El Modena Library
6	After School Community Programs - El Camino and Grijalva Parks
7	Bike Team Program - Community Oriented Policing
8	Assistance League of Orange - Operation School Bell
9	Friendly Center - Community Food Orange

Table 7 - Project Information

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

The City allocates CDBG funds to activities that address the priorities of the 2020-2024 Consolidated Plan and comply with CDBG regulations. The City and the CDBG Program Committee consider funding requests from nonprofit agencies based upon the proposed benefit to low and moderate income Orange residents, the agencies' demonstrated capacity to carry out the proposed activities, the financial feasibility of the proposed activities, and the amount of funding available. The City received an application for CDBG funds from MOMS of Orange County that is based in Santa Ana. The City's allocation strategy is to provide CDBG funds to the nonprofits that are based in Orange. For this reason, MOMS of Orange County did not receive CDBG funds. The primary obstacle to addressing unmet needs is the limited amount of funding available.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	Low and Moderate Income Areas
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$204,584
	<b>Description</b>	CDBG Administration
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not Applicable
	<b>Location Description</b>	Not Applicable
	<b>Planned Activities</b>	This activity will provide for the general management, coordination, monitoring, and evaluation of CDBG-funded activities.
2	<b>Project Name</b>	Orange Fair Housing Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$24,522
	<b>Description</b>	Providing Fair Housing Services to low and moderate income Orange residents.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 low and moderate income persons
	<b>Location Description</b>	Meeting are held virtually through Zoom.

	<b>Planned Activities</b>	The Fair Housing Foundation (FHF) will provide fair housing education, counseling, and enforcement; and related housing activities to affirmatively further housing laws on behalf of the City to comply with federal regulations.
<b>3</b>	<b>Project Name</b>	ADA Wheelchair Access Ramps
	<b>Target Area</b>	Low and Moderate Income Areas
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$68,430
	<b>Description</b>	This project includes the construction of sidewalk access ramps at various locations throughout the City. These access ramps will improve accessibility for the disabled to comply with the Americans with Disabilities Act.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1000 low and moderate income disabled persons
	<b>Location Description</b>	Various city locations.
	<b>Planned Activities</b>	This project includes the construction of sidewalk access ramps at various locations throughout the City. These access ramps will improve accessibility for the disabled to comply with the Americans with Disabilities Act.
<b>4</b>	<b>Project Name</b>	Beverly Neighborhood Street Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$611,830
	<b>Description</b>	The project includes street improvements on Beverly Neighborhood streets including portions of Flower Street, Stevens Street, Cherry Drive, Cedar Street, Popular Street, Eckhoff Street, and Beverly Drive.
	<b>Target Date</b>	12/31/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,305 low and moderate income persons
	<b>Location Description</b>	Portions of Flower Street, Stevens Street, Cherry Drive, Cedar Street, Popular Street, Eckhoff Street, and Beverly Drive.
	<b>Planned Activities</b>	Street improvement will include installing asphalt concrete overlay and adjustment of manholes and water valves to grade.
5	<b>Project Name</b>	Library ADA Improvement - El Modena Library
	<b>Target Area</b>	Low and Moderate Income Areas
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$65,000
	<b>Description</b>	ADA Improvements to the El Modena Library
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1000 low and moderate income disabled persons
	<b>Location Description</b>	El Modena Library at 380 S Hewes St, Orange, CA 92869.
	<b>Planned Activities</b>	Renovating the restrooms in El Modena Library to be compliant with current ADA standards.
6	<b>Project Name</b>	After School Community Programs - El Camino and Grijalva Parks
	<b>Target Area</b>	
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$43,170
	<b>Description</b>	The programs will provide supervised after-school recreation with a homework assistance component for children of ages five to 13.
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	El Camino Real Park-400 North Main Street, Orange, CA 92866 Grijalva Park-368 North Prospect Street, Orange, CA 92869
	<b>Planned Activities</b>	The programs will provide supervised after-school recreation with a homework assistance component for children of ages five to 13.
<b>7</b>	<b>Project Name</b>	Bike Team Program - Community Oriented Policing
	<b>Target Area</b>	Low and Moderate Income Areas
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	This program will provide a community-oriented policing strategy designed to improve the quality of life in high density housing located in Low Income areas of the City.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	47,260 low income persons
	<b>Location Description</b>	
	<b>Planned Activities</b>	This program will provide a community-oriented policing strategy designed to improve the quality of life in high density housing located in Low Income areas of the City.
<b>8</b>	<b>Project Name</b>	Assistance League of Orange - Operation School Bell
	<b>Target Area</b>	
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$13,770
	<b>Description</b>	This program will provide school clothing/uniforms, undergarments, shoe vouchers, and hygiene kits to Low Income elementary school (Kindergarten to Sixth Grade) students in the Orange Unified School District (OUSD).



	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	189 low and moderate income students
	<b>Location Description</b>	124 South Orange Street Orange, CA 92866
	<b>Planned Activities</b>	The program will provide school clothing and hygiene kits to Low Income OUSD elementary school (Kindergarten to Sixth Grade) students.
9	<b>Project Name</b>	Friendly Center - Community Food Orange
	<b>Target Area</b>	
	<b>Goals Supported</b>	Community Development
	<b>Needs Addressed</b>	Community Development
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	This program will provide free food to low income residents.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	500 low and moderate income persons
	<b>Location Description</b>	147 West Rose Avenue Orange, CA 92867 1820 North Meats Avenue Orange, CA 92865
	<b>Planned Activities</b>	Food will be distributed on a weekly basis at two Friendly Center sites.

## **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**

The City selected projects for funding that benefit low and moderate income neighborhoods. Activities that provide direct/individual benefit will also be offered on a citywide basis to low and moderate income households.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Low and Moderate Income Areas	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Funds are targeted to meet the National Objective of benefitting low and moderate income persons.

### **Discussion**

The City allocates its CDBG funds to public facilities projects such as street improvements, as well as public services that benefit low and moderate income persons.

## Affordable Housing

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

#### Introduction

During the needs assessment process, the City identified affordable housing as a priority need. The City takes every opportunity to allocate CDBG and HOME funds to affordable housing projects. However, the City did not receive applications for the FY2021-22 CDBG and HOME funds to provide affordable housing. The Orange County Housing Authority will continue providing Section 8 Rental Assistance/Housing Choice Vouchers to 438 low income households.

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

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	438
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	438

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

#### Discussion

See the previous portions of this section for discussion.

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

### **Introduction**

There is no public housing in the City of Orange.

### **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**

Not Applicable

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

### **Introduction**

The City identified unmet needs for homeless and special needs population during the needs assessment process. The City did not receive applications for homeless-related programs to allocate FY 2021-22 CDBG and HOME funds. However, the City plans to use other funding sources to provide financial assistance for the operation of the two homeless navigation centers in Buena Park and Placentia.

### **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**

While the City does not receive Emergency Solutions Grant (ESG) funds, the City supports the County of Orange Continuum of Care strategies to address homelessness. Additionally, the City is part of the North Orange County Service Planning Area and actively collaborates with the County of Orange and other local cities to address homeless related needs. Finally, the City gives priority and allocates CDBG funds to projects benefiting the homeless population whenever it receives applications for CDBG funds.

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

The City continues to support projects related to homelessness by allocating CDBG funds to these projects.

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

The City collaborates with the Orange County Housing Authority to provide Section 8 rental assistance to homeless families. The City is also working on its Regional Housing Needs Assessment (RHNA) allocations mandated through the California Department of Housing and Community Development by supporting projects that create permanent housing for the homeless population (extremely low and very low income).

The City supports OCHA's applications for Continuum of Care Program Permanent Supportive Housing Program projects. Currently, 36 households are residing in Orange with certificates for this program.

The City also supports OCHA's applications for the Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) Program vouchers, which combines rental assistance with case management and clinical services for homeless veterans. The VA Medical Center in Long Beach screens and selects veterans for participation in the Program, and refers qualified veterans to OCHA, which administers the housing component of the Program. Currently, 31 Orange households are participating in the HUD-VASH Program as of January 26, 2021.

**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.**

The City supports OCHA's applications for the Rental Assistance for Non-Elderly Persons with Disabilities (NED) Program, which provides incremental Section 8 vouchers. The goal of the Program is to enable Non-Elderly, Disabled households to transition from health care institutions or skilled nursing care to independent living with appropriate services. As of January 26, 2021, one Orange households were participating in this Program.

The City also supports OCHA's applications for the Family Unification Program (FUP), which provides Section 8 Rental Assistance to eligible families whose lack of adequate housing is a primary factor in the separation or threat of imminent separation of children from their families. The Program also provides vouchers for up to 18 months to emancipated youth (18 to 21 year old children that left foster care at age 16 or older and lack adequate housing). The Orange County Social Services Agency refers potential FUP participants to OCHA, which administers the housing component of the Program. As of January 26, 2021, 14 Orange households were FUP participants.

## **Discussion**

The City supports nonprofit applications for Continuum of Care funds to provide services and housing to the homeless. The City also seeks to provide CDBG funds to nonprofit agencies that serve the homeless. The Orange Police Department has a Homeless Engagement Assistance and Resource Team (HEART) to reach out to the homeless and connect them with the services. Officers work with the Orange County Mental Health Department and the Centralized Assessment Team to address homeless issues and find long term solutions.

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

### **Introduction:**

The City has limited vacant land for residential development. Considering the high cost of land, it is challenging to develop affordable housing projects that are financially feasible. Furthermore, the City's historic downtown area has its own zoning regulations and requirements that provide further barriers to development of affordable housing projects. While the City recognizes the importance of providing affordable housing to low and moderate income residents, the City allocates HOME funds and local funds to affordable housing projects to the extent possible.

### **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**

The City grants regulatory incentives and concessions to housing developers through its discretionary process. Concessions such as increased density (density bonus ordinance) or deferred impact fees may be granted for a project when the project includes a certain number of long-term affordable housing units.

### **Discussion:**

See the previous portions of this section for discussion.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City of Orange will undertake a variety of activities aimed at addressing the needs of the low and moderate income households. This includes providing affordable housing to the extremely low income population, addressing homelessness, and providing public services to low income children and families in need of food and shelter. Moreover, the City allocated CDBG funds to the Fair Housing Foundation to carryout fair housing activities, resolve any issues regarding fair housing, and hold workshops for tenants and landlords.

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

The City supports services and projects aimed at addressing homelessness, social services, and housing affordability. The City collaborates with the Orange County Housing Authority to provide Section 8 rental assistance to low income families. Furthermore, the City allocates CDBG funds to public services projects benefitting low and moderate income households. The allocation of CDBG and HOME funds is based on the high priority unmet needs that were identified during the preparation of the 2020-2024 Consolidated Plan.

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

The City preserves existing affordable housing stock by help financing rehabilitation of affordable housing projects or negotiating with the new owners of affordable housing projects. The City continually supports the preservation and development of affordable housing to maintain and increase affordable housing supply.

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

Given the limited CDBG funds, the City does not directly fund lead-based paint evaluation and reduction. The City supports the County of Orange efforts to reduce lead-based paint hazards in the City. If funding is available in the future, the City and the County plan to intensify their efforts to reduce the risk of lead poisoning for young, low income children that reside in El Modena, a lower income neighborhood.

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

Per Section 3 HUD Act of 1968, the City will encourage jobs generated through CDBG funded construction projects be advertised to low income residents where the construction project is located. Moreover, the City collaborates with the Orange County Housing Authority (OCHA) to provide Section 8 Rental Assistance/Housing Choice Voucher Program for low income residents. The Family Self-Sufficiency (FSS), that is part of the Section 8 program, uses a step-by-step process that helps Section 8



participants identify and reach career goals, overcome impediments to success, locate needed resources and support services, and develop confidence. FSS advisors provide guidance and referrals to participants for services including child-care, job training and placement, education, transportation, and medical assistance. Finally, the City supports applications for CDBG funds for job training and placement for youth and adults.

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

The City's Community Development Department includes the following Divisions: Building, Code Enforcement, Planning, and Housing. This enables the City to effectively coordinate its housing activities. The Planning Division performs functions that directly affect the development and rehabilitation of housing including preparation of the State-mandated Housing Element. The Planning Division also oversees the permit process, regulates compliance with zoning and building codes, and administers the Density Bonus Program required by State law.

The Housing Division administers the CDBG and HOME programs and is responsible for updating the Consolidated Plan every five years, preparing Annual Action Plans, and the Consolidated Annual Performance and Evaluation Report (CAPER). This Division works with various City departments that carry out CDBG-funded projects.

The City also works with Orange Housing Development Corporation (OHDC) and other developers to develop or rehab affordable housing projects. OHDC has provided attractive, affordable housing for low and moderate income households. The City encourages nonprofit agencies to apply for CDBG funds for programs that primarily benefit low and moderate income residents.

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

The City will continue to work with public and private agencies to coordinate the delivery of housing and related services. City staff sits on the Orange County Housing Authority Advisory Committee to provide input on housing issues that affect the community. The City also maintains close relationship with nonprofit organizations that provide social services to the community.

### **Discussion:**

See the previous portions of this section for discussion.

## Program Specific Requirements

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

#### Introduction:

#### 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%

**HOME Investment Partnership Program (HOME)  
Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City uses “Low and Moderate Income Housing Asset” funds to leverage its HOME funds. However, this funding source is limited. The City will consider other funding sources such as federal and state tax credits in conjunction with the HOME funds to finance affordable housing projects.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City does not use HOME funds for homebuyer activities.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City allocates HOME funds for rental affordable housing projects. Therefore, the City is not required to have guidelines for the resale or recapture of homeownership units acquired with HOME funds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not use HOME funds to refinance existing debt on multifamily housing projects.

None