

# City of Orange

## 6th Cycle Housing Element Update

(2021-2029)



ADOPTED FEBRUARY 2022



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- Appendix C: Summary of Community Engagement
- Appendix D: Glossary of Housing Terms

# Section 1: Introduction





# Introduction

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## A. Role of the Housing Element

The Housing Element is one of the seven state mandated Elements of the City of Orange General Plan. The Housing Element analyzes and identifies the City's existing and projected housing needs and contains a detailed outline and work program of the City's goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. The Housing Element identifies available candidate housing sites and establishes the City's official housing policies and programs to accommodate its fair share of the regional housing need as determined by the Southern California Association of Governments (SCAG). It also addresses maintenance and expansion of the housing supply to accommodate households currently living and expected to live in Orange.

## B. State Policy and Authorization

### 1. Background

As a mandated chapter of the Orange General Plan, the Housing Element must meet all applicable requirements of existing state law when updated. Goals, programs and policies, and quantified objectives within the Housing Element consistent with state law are implemented within the housing cycle timeline to ensure the City accomplishes the identified actions.

### 2. State Requirements

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element. California Government Code Section 65580 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years.

The California Legislature has adopted an overall housing goal for the State to ensure every resident has a decent home and suitable living environment. Section 65580 of the California Government Code states:

- a. *The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.*
- b. *The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.*
- c. *The provisions of housing affordable to low- and moderate-income households requires the cooperation of all levels of the government.*
- d. *Local and State governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic,*



*environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.*

**Table 1-1** summarizes State Housing Element requirements and identifies the location in this document where these requirements are addressed.

<b>Table 1-1: Housing Element Requirements</b>		
<b>Housing Element Requirement(s)</b>	<b>Gov. Code Section</b>	<b>Reference in Housing Element</b>
Analysis of employment trends.	Section 65583.a	Section 2.B.1
Projection and quantification of existing and projected housing needs for all income groups.	Section 65583.a	Section 3.E
Analysis and documentation of the City’s housing characteristics, including cost for housing compared to ability to pay, overcrowding, and housing condition.	Section 65583.a	Section 2.C, D, F
An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential.	Section 65583.a	Section 3.E.1, 2, 3
Analysis of existing and potential governmental constraints upon the maintenance, improvement or development of housing for all income levels.	Section 65583.a	Section 3.B
Analysis of existing and potential nongovernmental (private sector) constraints upon maintenance, improvement or development of housing for all income levels.	Section 65583.a	Section 3.A
Analysis concerning the needs of the homeless.	Section 65583.a	Section 2.E.7
Analysis of special housing needs: handicapped, elderly, large families, farm workers, and female-headed households.	Section 65583.a	Section 2.E
Analysis of opportunities for energy conservation with respect to residential development.	Section 65583.a	Section 3.G
Identification of Publicly Assisted Housing Developments.	Section 65583.a	Section 3.J.5
Identification of Units at Risk of Conversion to Market Rate Housing.	Section 65583.a	Section 3.J.5
Identification of the City’s goal relative to the maintenance, improvement, and development of housing.	Section 65583.a	Section 4
Analysis of quantified objectives and policies relative to the maintenance, improvement, and development of housing.	Section 65583.b	Section 4
Identification of adequate sites that will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels.	Section 65583.c(1)	Appendix B
Identification of strategies to assist in the development of adequate housing to meet the	Section 65583.c(2)	Section 3.E.1, 2, 3



**Table 1-1: Housing Element Requirements**

Housing Element Requirement(s)	Gov. Code Section	Reference in Housing Element
needs of low and moderate-income households.		
Description of the Public Participation Program in the formulation of Housing Element Goals, Policies, and Programs.	Section 65583.d	Appendix C
Description of the Regional Housing Needs Assessment (RHNA) prepared by the Southern California Association of Governments.	Section 65583.e	Section 3.E.1
Analysis of Fair Housing, including Affirmatively Furthering Fair Housing.	Section 8899.50	Section 3.H, I, J, K, L
Review of the effectiveness of the past Element, including the City’s accomplishments during the previous planning period.	Section 65583.f	Appendix A

*Source: State of California, Department of Housing and Community Development.*

The State of California began requiring in 1969 that all local governments plan for housing needs through Housing Elements within each jurisdiction’s General Plan. Housing Elements must be updated every eight years – this timeframe is also referred to as a cycle. This Housing Element is part of the 6<sup>th</sup> Cycle for 2021 to 2029.

Orange’s Housing Element was last adopted in January 2014 for the State’s 5<sup>th</sup> Housing Element cycle for the 2014-2021 planning period. Housing Elements are updated on eight year cycles, with each region across the state having the same start and end time. The 6<sup>th</sup> Cycle Housing Element, for the 2021-2029 planning period, is part of the new update cycle for jurisdictions within the SCAG (Southern California Association of Governments) region to allow for synchronization with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The Element sets forth an 8-year strategy to address the City’s identified housing needs, including specific implementing programs and activities.

Multiple amendments have been made to Housing Element law since the adoption of the City’s 5<sup>th</sup> Cycle Housing Element. These amendments and subsequent, new housing laws change the required analysis, reporting and policies contained in the Housing Element. The updated Housing Element complies with these amendments to state housing law and all other federal, state, and local requirements.

### 3. Regional Housing Needs Assessment

Section 65583 of the California Government Code sets forth the specific content requirements of a jurisdiction’s housing element. These requirements include obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs. Local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by the California Department of Housing and Community Development (HCD). Orange is located in the SCAG regional planning area (but is not a member of SCAG). SCAG is the COG responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region in coordination with HCD.



The RHNA allocation provides requirements for housing at all income levels within the community. The allocation is divided up between very low, low, moderate, and above moderate-income categories. Specific housing types and densities are generally associated with providing housing for each income category; the Housing Element must allow for the required number of units to be built throughout the City by facilitating and promoting certain housing types.

HCD established the planning period for the current RHNA from October 15, 2021 to October 15, 2029. For the 2021-2029 planning period the City is allocated a total of 3,927 units, including 1,064 units affordable to very low-income households, 603 units affordable to low-income, 676 units affordable to moderate-income, and 1,584 units affordable to above-moderate income households.

#### 4. Relationship to Other General Plan Elements

The Housing Element is one Chapter of the City of Orange General Plan. The goals, policies, actions, and programs described in the Housing Element relate to, and are consistent with, the other Elements of the Orange General Plan. The City's Housing Element focuses on programs and policies that support the preservation, improvement, and development of housing to meet the existing and projected future housing needs of its population.

The Housing Element supports and reinforces development policies contained in the Land Use Element, most recently amended in 2015. The Land Use Element establishes the location, type, intensity, and distribution of land uses throughout the City, and defines these land uses build-out potential. By designating residential development, the Land Use Element identifies limits for densities and types of housing units constructed in the City. The Land Use Element identifies lands designated for a range of other land uses, including employment-generating uses, open space, and public uses. The presence and potential for jobs affects the current and future local demand for housing at the various income levels in the City.

The Circulation and Mobility Element of the General Plan relates to the Housing Element. The Transportation Element establishes policies for a balanced circulation system in the City. Consequently, the Housing Element must include policies and incentives that consider the types of infrastructure essential for residential housing units in addition to mitigating the effects of growth in the City.

The Economic Development Element of the General Plan also relates to the Housing Element. The Economic Development Element establishes policies for preserving and maintaining a diverse economic base and increasing employment opportunities. The Housing Element correlates to the Economic Development Element as it must consider housing for the City's current and future workforce, as well as include policies and incentives that support housing for all economic segments of the community.

The Housing Element has been reviewed for consistency with the City's other General Plan Elements, and the policies and programs in the Housing Element's policies and programs are consistent with the other Elements. As portions of the General Plan may be amended in the future, the Housing Element will be reviewed to ensure internal consistency is maintained.



## 5. Public Participation

Section 65583 of the Government Code states that, "The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." Meaningful community participation is also required in connection with the City's Assessment of Fair Housing (AFH). A discussion of citizen participation is provided below.

As part of the 6<sup>th</sup> Cycle Housing Element Update process, the City of Orange has conducted extensive public outreach activities beginning in 2019. These recent outreach efforts included workshops, stakeholder meetings, digital media, an online survey, and public noticing. Project materials, including summaries from community workshops and public meetings, notices, and draft public review documents are available on the City's website: <https://www.cityoforange.org/290/Current-Projects>.

Outreach for the 6th Cycle Housing Element to the community, includes the following actions:

- Housing Element Update webpage with all housing materials and information, located at <https://www.cityoforange.org/290/Current-Projects>
- Virtual Community Workshops with recordings available on the webpage
- Online Community Survey available from October 12, 2020 to December 1, 2020.

As required by Government Code Section 65585(b)(2), all written comments regarding the Housing Element made by the public have previously been provided to each member of the City Council.

Appendix C contains a summary of all public comments regarding the Housing Element received by the City during the update process.

## 6. Data Sources

The data used for the completion of this Housing Element comes from a variety of sources. These include, but are not limited to:

- 2000 and 2010 Census
- American Community Survey
- Regional Analysis of Impediments to Fair Housing (AI)
- Point-in-Time Homeless Census by the Regional Task Force on the Homeless, 2019
- Home Mortgage Disclosure Act (HMDA) lending data
- California Department of Economic Development
- California Employment Development Division Occupational Wage data, 2020
- Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

The data sources represent the best data available at the time this Housing Element Update was prepared. The original source documents contain the assumptions and methods used to compile the data.



## 7. Housing Element Organization

This Housing Element represents the City’s policy program for the 2021-2029 6<sup>th</sup> Planning Period. The Housing Element is comprised of the following Chapters:

**Chapter 1: Introduction** contains a summary of the content, organization, and statutory considerations of the Housing Element;

**Chapter 2: Community Profile** contains an analysis of the City’s population, household and employment base, and the characteristics of the housing stock;

**Chapter 3: Housing Constraints and Resources** examining governmental and non-governmental constraints on production, maintenance, and affordability of housing and provides a summary of housing resources, including sites identification and funding and financial considerations;

**Chapter 4: Policy Plan** addresses Orange’s identified housing needs, including housing goals, policies, and programs.

**Appendices** provides various appendices with supplementary background resources including:

- **Appendix A** – Review of Past Performance of 5<sup>th</sup> Cycle Housing Element Programs
- **Appendix B** – Adequate Sites Analysis
- **Appendix C** – Community Engagement Summary
- **Appendix D** – Glossary of Housing Terms

# Section 2: Community Profile





# City of Orange Community Profile

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The Community Profile for the City of Orange provides an overview of the City's housing and population conditions. The community profile serves as a foundational component for the Housing Element's policies by describing and assessing contributing factors and characteristics that influence the supply and demand for housing in Orange. Specifically, the community profile describes population, employment, economics and household characteristics in Orange. Special Needs groups and housing stock characteristics are also described.

The data in this community profile has been collected using the most current available sources from the Southern California Association of Governments (SCAG), 2000 and 2010 U.S. Census, 2013-2019 American Community Survey, the California Department of Finance, the California Employment Development Department, the California Department of Education and other real estate market data.

## A. Population Characteristics

Population characteristics influence current and future housing demand in a community. Population growth, age compositions and race/ethnicity influence the type and extent of housing needed and the ability of the local population to afford housing costs. The following section describes and analyzes various population characteristics and local trends.

### 1. Population Growth

**Table 2-1** displays actual and projected populations for the City of Orange and surrounding cities from 2000 to 2040. The 2010 U.S. Census reported a population of 136,416 persons in the City of Orange. This is a nearly six percent increase from the 2000 population. Orange's rate of population increase between 2000 to 2010 is slightly lower than nearby cities Yorba Linda and Fullerton which both saw about a seven percent increase. Orange experienced a larger rate of population growth than Anaheim, Garden Grove and Santa Ana.

The SCAG Final Growth Forecast Report (2016-2040) bases population, economic and housing forecasts off U.S. Census data, projecting forecasted data through 2040. This data, shown in Table 1, forecast an 8,300-person population increase from 2020 to 2035 and another 1,600 person increase from 2035 to 2040. The City of Orange is estimated to experience an additional 10.5 percent growth in population from 2012 to 2040. The County of Orange, Fullerton, and Yorba Linda are forecast to experience over 16 percent growth rate, while Garden Grove and Santa Ana are forecast less than five percent growth through 2040. The City of Orange's growth forecast indicates steady population growth through 2040.



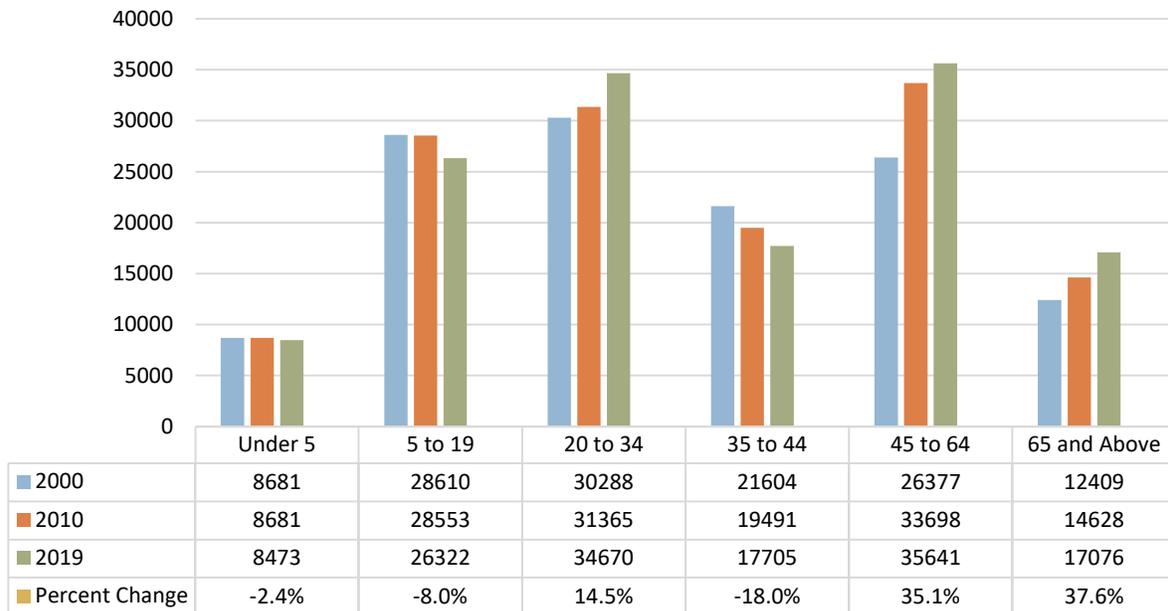
Jurisdictions	Population						Percent Change	
	2000 Actual	2010 Actual	2012 Estimated	2020 Projected	2035 Projected	2040 Projected	1990-2010	2012-2040
Anaheim	328,014	336,265	345,300	358,600	382,000	403,400	2.5%	16.8%
Fullerton	126,003	135,161	138,000	145,700	158,300	160,500	7.3%	16.3%
Yorba Linda	59,918	64,234	66,200	69,300	70,400	70,500	7.2%	6.5%
<b>Orange</b>	<b>128,821</b>	<b>136,416</b>	<b>138,500</b>	<b>143,100</b>	<b>151,400</b>	<b>153,000</b>	<b>5.9%</b>	<b>10.5%</b>
Santa Ana	337,977	324,528	329,200	340,600	343,400	343,100	-4.0%	4.2%
Garden Grove	165,196	170,883	172,900	176,100	178,400	178,200	3.4%	3.1%
County of Orange	2,846,289	3,010,232	3,071,600	3,271,100	3,431,200	3,461,500	2.5%	16.8%

*Represents an estimate from the SCAG 2016-2040 Final Growth Forecast by Jurisdiction.  
Sources: Bureau of the Census (2000-2010) and SCAG 2016-2040 Final Growth Forecast by Jurisdiction (2012).*

## 2. Age Characteristics

A community's age composition is an important factor when evaluating housing needs because housing demand is often determined by the preferences of certain age groups. For example, young adults and seniors generally favor apartments, low to moderate-cost condominiums, and smaller or more affordable single-family units because they tend to live on smaller or fixed incomes and have smaller families. Middle-aged persons between 35 and 65, makes up the largest portion of home buyers and represents the greatest market demand for moderate and higher cost apartments and condominiums because they generally have higher incomes and larger families to accommodate. As the population ages and moves through different stages of life, housing needs must also be adjusted.

**Figure 2-1: Age Distribution in Orange**



*Source: United States Census Bureau, 2000 and 2010; American Community Survey, 5-Year Estimates, 2019.*



Figure 2-1 shows age composition in the City of Orange from 2000 to 2019 with the percent change over that period. Persons aged 65 and above experienced the largest growth at 37.6 percent. Persons aged 45 to 64 also experienced a large increase at 35.1 percent. Adults between 35 and 44 years experienced the greatest decrease at 18 percent.

Overall, the City of Orange shows a trend towards an aging population with steady population increases in persons over the age of 45 and a decreasing population of persons aged 19 and younger. An increasing aging population may require changes in housing needs including housing types, amenities, and access to specialized services.

Table 2-2 displays estimated 2019 American Community Survey age distribution for Orange, the County of Orange, and nearby cities. Orange’s largest population is between 20 to 44 years of age (37.5 percent). The population is comprised of 25.6 percent people ages 45 to 64 years and 12.2 percent ages 65 and over. 2019 age distribution estimates are similar to surrounding cities. The largest population group for cities shown in Table 2-2, excluding Yorba Linda, are persons age 20 to 44.

<b>Jurisdiction</b>	<b>Under 18</b>	<b>20 to 44</b>	<b>45 to 64</b>	<b>65 years +</b>
Anaheim	24.0%	37.4%	24.3%	11.6%
Fullerton	21.8%	37.0%	24.9%	13.3%
Yorba Linda	23.1%	26.0%	31.1%	18.0%
<b>Orange</b>	<b>21.3%</b>	<b>37.5%</b>	<b>25.6%</b>	<b>12.2%</b>
Santa Ana	26.9%	39.2%	22.1%	9.0%
Garden Grove	21.4%	34.3%	27.5%	14.3%
County of Orange	22.2%	34.1%	26.7%	14.4%
<i>Source: American Community Survey, 5-Year Estimates, 2019.</i>				

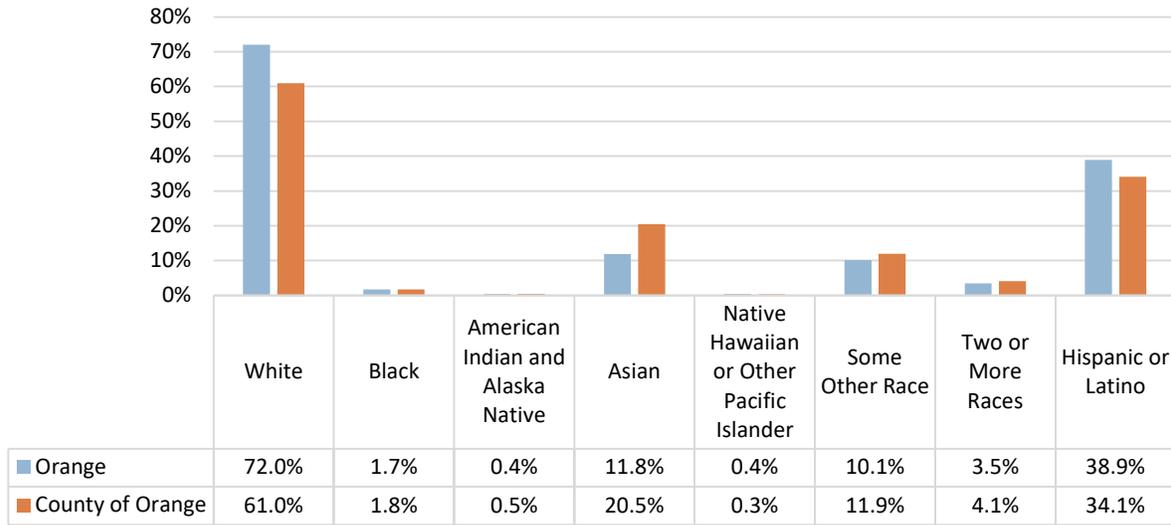
### 3. Race/Ethnicity Characteristics

Racial and ethnic composition may influence housing due to varying household characteristics, income levels, and cultural backgrounds that may affect housing needs, housing choice and housing types. Cultural influences may influence preference for specific types of housing and locational factors.

Figure 2-2 displays 2019 racial and ethnic composition for the City of Orange compared to the County of Orange. Figure 2-2 shows majority of the population was White in the City and County. The next largest population in the City of Orange was Asian. Represented racial groups in Orange include 72 percent identifying as White, 1.7 percent identifying as Black, and 11.8 percent identifying as Asian. Those who identify as American Indian/Alaska Native and Native Hawaiian/other Pacific Islander represent the smallest percentages of the population; both combined add up to under one percent of the population. About 39 percent of all races in Orange identify as Hispanic or Latino.



Figure 2-2: Racial Ethnic Composition, 2019



Source: American Community Survey, 5-Year Estimates, 2019.

**Table 2-3** compares racial and ethnic data for Orange and nearby cities. In all nearby cities, the largest population was White. The City of Orange has the second largest White population at 72 percent after Yorba Linda. The Cities of Anaheim and Fullerton both have larger Black populations than Orange with about one percent more. The Asian population of Orange is 8 percent below the County’s regional percentage, and similarly to Santa Ana, it represents the lowest amount of the surrounding cities. All the cities in this area, as well as the County of Orange, have American Indian/Alaska Native and Native Hawaiian/other Pacific Islander populations that represent less than one percent of the total populations.

**Table 2-3: Racial/Ethnic Composition by Jurisdiction, 2019**

Jurisdiction	White	Black	American Indian and Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Some Other Race	Two or More Races	Hispanic or Latino Origin <sup>(1)</sup>
Anaheim	66.42%	2.70%	0.51%	16.82%	0.42%	9.87%	3.26%	54.28%
Fullerton	58.29%	2.49%	0.38%	24.28%	0.28%	9.19%	5.09%	37.14%
Yorba Linda	72.24%	1.37%	0.12%	20.71%	0.11%	1.52%	3.93%	16.46%
<b>Orange</b>	<b>72.0%</b>	<b>1.7%</b>	<b>0.4%</b>	<b>11.8%</b>	<b>0.4%</b>	<b>10.1%</b>	<b>3.5%</b>	<b>38.9%</b>
Santa Ana	40.15%	1.14%	0.55%	11.76%	0.28%	44.06%	2.05%	76.76%
Garden Grove	40.28%	1.01%	0.50%	41.20%	0.33%	14.36%	2.32%	36.36%
County of Orange	61.0%	1.8%	0.5%	20.5%	0.3%	11.9%	4.1%	34.1%

Source: American Community Survey, 5-Year Estimates, 2019.

Note: (1) Persons of Hispanic or Latino Origin is an ethnicity that may be included in other racial groups.



The Census and the 2019 ACS report changes in Orange’s racial and ethnic demographics from 2000 to 2019, as shown in **Table 2-4**. From 2000 to 2010, the White population decreased by about five percent and the American Indian and Alaska Native population decreased from 0.8 percent to 0.7 percent (12.5 percent overall decrease). During this same period other racial groups experienced significant increases. The Asian population increased from 9.3 percent in 2000 to 11.3 percent in 2010 (21.5 percent increase). The Black population experienced no population change. Persons identifying as Hispanic or Latino increased by 18.3 percent between 2000 and 2010.

Between 2010 and 2019, the White population increased by 7.3 percent, representing 72 percent of Orange’s population. The Black population experienced a 6.3 percent increase. Decreases were experienced by the American Indian and Alaska Native, Some Other Race, and Two or More Races populations. The Asian population showed a 4.4. percent increase from 2010-2019. Persons identifying as Hispanic or Latino experienced a 2.1 percent increase from 2010 to 2019.

**Table 2-4: Changes in Racial/Ethnic Composition Between 2000 - 2019**

<b>Race/Ethnicity</b>	<b>2000</b>	<b>2010</b>	<b>2019</b>	<b>Percent Change 2000 to 2010</b>	<b>Percent Change 2010 to 2019</b>
White	70.5%	67.1%	72.0%	-4.8%	7.3%
Black	1.6%	1.6%	1.7%	0.0%	6.3%
American Indian and Alaska Native	0.8%	0.7%	0.4%	-12.5%	-42.9%
Asian	9.3%	11.3%	11.8%	21.5%	4.4%
Native Hawaiian or Other Pacific Islander	0.2%	0.3%	0.4%	50.0%	33.3%
Some Other Race	13.8%	15.1%	10.1%	9.4%	-33.1%
Two or More Races	3.8%	4.0%	3.5%	5.3%	-12.5%
Hispanic or Latino	32.2%	38.1%	38.9%	18.3%	2.1%

*Source: United States Census Bureau, 2000 and 2010 and American Community Survey, 5-Year Estimates, 2019.*

## B. Economic Characteristics

Analysis of economic characteristics provides valuable data about a community’s accessibility to the housing market and financial restraints related to housing needs. These may include income associated with different types of employment and number of workers contributing to the household. To properly evaluate the balance between jobs and housing, employment characteristics should be considered. Local employment growth or decline is linked to local housing demand



## 1. Employment and Wage Scale

The SCAG Growth Forecast Report estimates employment growth for the City of Orange and nearby cities. **Table 2-5** shows that from 2012 to 2040 the City of Orange is forecast to gain 11,200 jobs, a 12.1 percent increase. Nearby cities such as Garden Grove and Yorba Linda forecast similar growth increases (12.6 percent and 13.5 percent respectively). Other cities, such as Anaheim and Fullerton are projected much higher employment growth, at 38.1 percent in Anaheim and 54.8 percent in Fullerton.

**Table 2-1** shows a forecasted 14,500-person population growth in Orange from 2012 to 2040. Given this anticipated growth, local job availability is important to allow residents the option to live and work in the same city. Just as employment opportunities may encourage households to move to Orange, a variety of available housing options may also encourage households to seek employment in the City.

Jurisdiction	2012	2020	2035	2040	% Change 2012-2040	Numeric Change 2012-2040
Anaheim	177,900	207,000	236,000	245,600	38.1%	67,700
Fullerton	60,800	78,000	91,600	94,100	54.8%	33,300
Yorba Linda	15,600	16,800	17,600	17,700	13.5%	2,100
<b>Orange</b>	<b>94,100</b>	<b>100,700</b>	<b>104,700</b>	<b>105,500</b>	<b>12.1%</b>	<b>11,400</b>
Santa Ana	154,800	160,600	165,200	166,000	7.2%	11,200
Garden Grove	51,700	56,600	58,200	58,200	12.6%	6,500
County of Orange	1,526,500	1,730,400	1,870,500	1,898,900	24.4%	372,400

Source: SCAG 2016-2040 Final Growth Forecast by Jurisdiction (2012).

Analyzing employment sectors helps in understanding growth changes, income and wages, access to different housing types, and overall housing demand. The City of Orange is a generally moderate-income community with a slightly higher than average median income compared to the County of Orange (see Table 2-13). Employment industry types associated with these income ranges include persons employed in education, professional, health care, and management industries (Table 2-6).

**Table 2-6** displays the 2010 and 2019 ACS data for employment by sector in the City of Orange. In 2010, a majority of the working population was employed in education services, health care, and social assistance industries (18.5 percent). Professional, scientific, management, and administrative services, retail trade and manufacturing were the next largest employment sectors in Orange in 2010. In 2019, Education services, health care and social assistance jobs remained the largest employers in the City, reaching 22.6 percent, representing a 30.2 percent increase from 2010. Professional, scientific, management, and administrative services remained the second largest employment sector. However, these industries experienced an overall decrease of 0.5 percent. Arts, entertainment, recreation, accommodation, and food services experienced the largest growth rate, increasing from 8.6 percent in 2010 to 10.7 percent in 2019, a 32.8 percent increase.



**Table 2-6: Employment in Orange by Sector, 2010 - 2019**

Industry Sector	2010		2019		Percent Change 2010-2017
	# of employed persons	% of City Employment	# of employed persons	% of City Employment	
Agriculture, forestry, fishing and hunting, and mining	488	0.7%	321	0.5%	-34.22%
Construction	5,617	8.5%	5331	7.6%	-5.09%
Manufacturing	7,736	11.7%	7809	11.1%	0.94%
Wholesale trade	2,692	4.1%	2056	2.9%	-23.63%
Retail trade	6,852	10.3%	6656	9.4%	-2.86%
Transportation and warehousing, and utilities	1,779	2.7%	2394	3.4%	34.57%
Information	1,385	2.1%	1423	2.0%	2.74%
Finance and insurance, and real estate and rental leasing	6,281	9.5%	5958	8.4%	-5.14%
Professional, scientific, management, and administrative services	9,454	14.3%	9407	13.3%	-0.50%
Education services, health care, and social assistance	12,269	18.5%	15973	22.6%	30.19%
Arts, entertainment, recreation, accommodation, and food services	5,681	8.6%	7542	10.7%	32.76%
Other services (except public administration)	3,890	5.9%	3348	4.7%	-13.93%
Public Administration	2,216	3.3%	2303	3.3%	3.93%
<b>Total</b>	<b>66,340</b>	<b>100%</b>	<b>70,521</b>	<b>100%</b>	<b>6.30%</b>

*Source: American Community Survey, 5-Year Estimates, 2010 and 2019.*

Analyzing the unemployment rate contributes to understanding housing affordability and needs, as well as projected needs. According to the ACS survey data, (Table 2-7) Orange experienced a 4.4 percent unemployment rate, similarly to the County's. Yorba Linda was the only city nearby that had a lower unemployment rate than Orange, with other cities' rates ranging from 6.5 percent in Fullerton to 4.5 percent in Garden Grove.

Table 2-7: Unemployment Rates, 2019	
Jurisdiction	Unemployment rate*
Anaheim	5.2%
Fullerton	6.5%
Yorba Linda	3.6%
<b>Orange</b>	<b>4.4%</b>
Santa Ana	5.1%
Garden Grove	4.5%
County of Orange	4.6%

*Source: American Community Survey, 5-Year Estimates, 2019.  
\*Population 16 years and over*



**Table 2-8** displays the 2019 average annual wage for occupations compile by the California Employment Development Department (EDD) for the Orange County Metropolitan Statistical Area. Professional and health services occupations, including management, legal services, healthcare practitioners and technical, architecture and engineering, and computer or mathematical services, were among the highest paying professions in the region. Additionally, occupations such as life, physical and social sciences and business or financial operations offer above median income pay. Educational occupations offer just below median income pay, and, referring to table 2-6 are the most common occupation in the City of Orange.

<b>Table 2-8: Mean Salary by Occupation in Orange County, 2019</b>	
<b>Occupation</b>	<b>Salary</b>
Management	\$124,158
Legal	\$111,887
Healthcare Practitioners and Technical	\$92,080
Architecture and Engineering	\$91,796
Computer and Mathematical	\$91,533
Life, Physical and Social Sciences	\$82,951
Business and Financial Operations	\$72,759
Education, Training and Library	\$60,130
Arts, Design, Entertainment, Sports and Media	\$55,157
Construction and Extraction	\$58,307
Protective Services	\$38,388
Community and Social Service	\$51,921
Installation, Maintenance and Repair	\$52,114
Sales	\$34,774
Office and Administration Support	\$42,964
Production	\$35,768
Transportation and Material Moving	\$31,774
Healthcare Support	\$30,171
Building, Grounds Cleaning, and Maintenance	\$31,603
Personal Care and Service	\$29,613
Farming, Fishing and Forestry	\$31,978
Food Preparation and Serving Related	\$27,895
<i>Source: California Employment Development Division, Occupational Wage data, 2019.</i>	



## C. Household Characteristics

A household is defined by the U.S. Census Bureau as all persons who occupy a housing unit. This may include single persons living alone, families related through marriage, blood or adoption, domestic partnerships and unrelated individuals living together. Nursing facilities, residential care facilities, dormitories, and other group living are not considered housing units, and the persons living within them are not considered a household.

Analysis of household characteristics assists in understanding growth and determining housing needs of a community. Income and affordability are best measured at the household level, including special needs of certain groups. These may include large families, single parent households, or low and extremely low-income households.

### 1. Household Type and Size

Table 2-9 displays 2019 American Community Survey (ACS) household characteristics data for Orange and nearby cities. The ACS reported 43,075 households in the City of Orange in 2019. Of this total, 56 percent were married-couple family households, comparable to nearby cities with the exception of Yorba Linda which reported a significantly higher percent (71.3 percent). Compared to nearby cities, Orange had a slightly smaller percent of female headed households with no spouse present (11.9 percent). Non-family households made up 26.8 percent of all households in Orange, generally higher than nearby cities.

**Table 2-9: Household Characteristics, 2019**

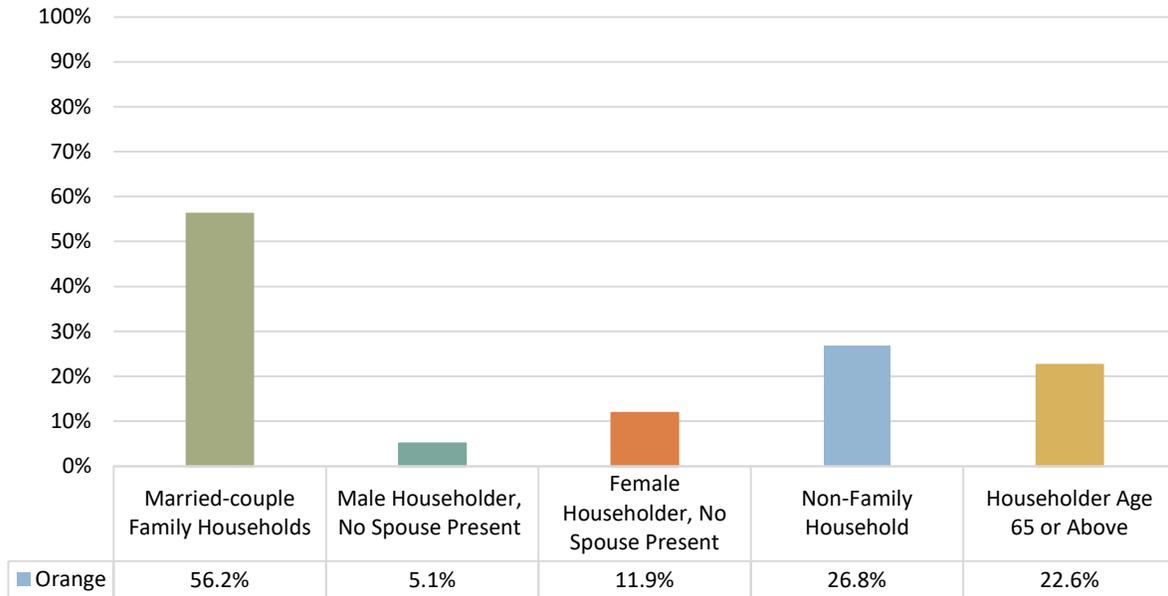
Jurisdiction	Married-Couple Family Households	% of Total Households	Female Householder, No Spouse Present	% of Total Households	Non-Family Household	% of Total Households	Total Households
Anaheim	52,747	51.90%	15,889	15.60%	26,539	26.10%	101,658
Fullerton	23,855	52.10%	5,588	12.20%	13,818	30.20%	45,814
Yorba Linda	16,142	71.30%	1,687	7.40%	3,907	17.30%	22,649
<b>Orange</b>	<b>24,227</b>	<b>56.20%</b>	<b>5,114</b>	<b>11.90%</b>	<b>11,555</b>	<b>26.80%</b>	<b>43,075</b>
Santa Ana	42,486	55.40%	13,137	17.10%	14,031	18.30%	76,624
Garden Grove	26,255	55.00%	7,074	14.80%	10,396	21.80%	47,761
County of Orange	569,260	24.90%	119,719	11.50%	293,481	28.30%	1,037,492

Source: American Community Survey, 5-Year Estimates, 2019.

Figure 2-3 depicts household composition in the City of Orange, including data for households with the householder age 65 or older. As previously noted in Table 2-9, Orange has a relatively low percentage of female householders with no spouse present, and even lower percentage of male householders with no spouse present (5.1 percent). A majority of Orange households are married couple families and 22.6 percent of all households have a householder of 65 years and over.



Figure 2-3: Orange Household Characteristics in Percent, 2019



Source: American Community Survey, 5-Year Estimates, 2019.

**Table 2-10** shows changes in household characteristics from 2000 to 2019. From 2000 to 2019, the City of Orange experienced a 5.2 percent increase in total households. Of those households in 2000, about 57 percent were married-couple family households. Married-couple family households decrease to about 56.2 percent in 2019. The percent of households with a householder 65 years and over increased by about 36.9 percent from 2000 to 2019. Additionally, the percent of female headed households with no spouse present increased from 4,743 persons in 2000 to 5,114 persons in 2019 (a 7.8 percent increase).

Table 2-10: Changes in Household Characteristics, 2000-2019						
	2000	Percent	2010	Percent	2019	Percent
Married-couple Family Households	23,375	57.1%	23,572	54.4%	24,227	56.2%
Female Household, No Spouse Present	4,743	11.6%	5,260	12.1%	5,114	11.9%
Non-Family Household	10,762	26.3%	12,111	27.9%	11,555	26.8%
Householder 65 Years and Over	7,125	17.4%	8,682	20.0%	9,753	22.6%
<b>Total Households</b>	<b>40,930</b>	<b>100.0%</b>	<b>43,367</b>	<b>100.0%</b>	<b>43,075</b>	<b>100.0%</b>

Source: American Community Survey, 5-Year Estimates, 2017.

The SCAG 2012 to 2040 Final Growth Forecast estimates expected growth in the in the City of Orange and surrounding cities, shown below in **Table 2-11**. From 2012 to 2040 Orange is forecast to experience steady household growth, totaling 13.1 percent by 2040. Orange’s household growth forecast is about 2 percent



below that of the County, but has a higher forecasted growth than Yorba Linda, Santa Ana, and Garden Grove. Anaheim and Fullerton have households growth forecasts greater than Orange by 10.5 percent and 8.2 percent (respectively).

Jurisdiction	2012	2020	2035	2040	Percent Change 2012 - 2040
Anaheim	99,200	104,600	114,100	122,600	23.6%
Fullerton	45,500	48,800	54,300	55,200	21.3%
Yorba Linda	21,900	22,900	23,300	23,400	6.8%
<b>Orange</b>	<b>43,600</b>	<b>45,300</b>	<b>48,500</b>	<b>49,300</b>	<b>13.1%</b>
Santa Ana	73,300	76,600	77,700	78,000	6.4%
Garden Grove	46,200	47,300	48,000	48,200	4.3%
County of Orange	999,500	1,074,700	1,135,300	1,152,300	15.3%

*Source: SCAG 2016-2040 Final Growth Forecast by Jurisdiction (2012).*

**Table 2-11** displays average household size in Orange and nearby cities in 2019. The County of Orange has an average household size of 3.05 in 2019, slightly smaller compared to Orange’s average household size of 3.18. The Cities of Santa Ana and Garden Grove have larger average household sizes of 4.32 and 3.6 respectively. Orange’s average household is in the mid-range compared to surrounding cities.

Jurisdiction	Average Persons per Household
Anaheim	3.41
Fullerton	3.02
Yorba Linda	2.78
<b>Orange</b>	<b>3.18</b>
Santa Ana	4.32
Garden Grove	3.60
County of Orange	3.05

*Source: American Community Survey, 5-Year Estimates, 2019.*

## 2. Household Income

Household income is directly connected to affordability. As household income increases, the ability to afford higher priced housing units increases. This may include access to larger sized units and/or ability to move from rental to ownership opportunities. However, as household income decreases, households will likely utilize a disproportionate amount of their income toward housing costs. This may influence incidences of overcrowding and substandard living conditions.



The California State Department of Housing and Community Development (HCD) has identified the following income categories based on the Area Median Income (AMI) of Orange County;

- **Very Low-income:** households earning between 0 and 50 percent of the AMI
- **Low-income:** households earning between 51 percent and 80 percent of the AMI
- **Moderate Income:** households earning between 81 percent and 120 percent of the AMI
- **Above Moderate Income:** households earning over 120 percent of the AMI

State law also defines extremely low-income as households earning 30 percent or less of the AMI and are considered a subset of the very low-income category. Combined, the extremely low, very low, and low-income groups are referred to as lower income.<sup>1</sup>

Comprehensive Housing Affordability Strategy (CHAS) estimates based on 2006-2017 American Community Survey (ACS) data are shown in **Table 2-12**. Households exhibit a near even split between renters and owners in Orange. There was a higher percentage of renters in the extremely low-income category, and a greater percentage of owners in the moderate- or above-moderate income level than renters. In 2017, a little over half of households had a moderate or above moderate income. Just under 20 percent of those household were in the low-income category. The very low and extremely low-income categories constitute about 24 percent of total households.

<b>Income Category (% of County AMI)</b>	<b>Owner</b>	<b>Percent</b>	<b>Renter</b>	<b>Percent</b>	<b>Total</b>	<b>Percent</b>
Extremely Low (30% AMI or less)	1,570	3.7%	3,920	9.2%	5,490	12.9%
Very Low (31 to 50% AMI)	2,015	4.7%	2,975	7.0%	4,990	11.7%
Low (51 to 80% AMI)	3,855	9.0%	4,550	10.7%	8,405	19.7%
Moderate or Above Moderate (over 80% AMI)	16,835	39.5%	6,905	16.2%	23,740	55.7%
<b>Total</b>	<b>24,280</b>	<b>57.0%</b>	<b>18,345</b>	<b>43.0%</b>	<b>42,625</b>	<b>100.0%</b>

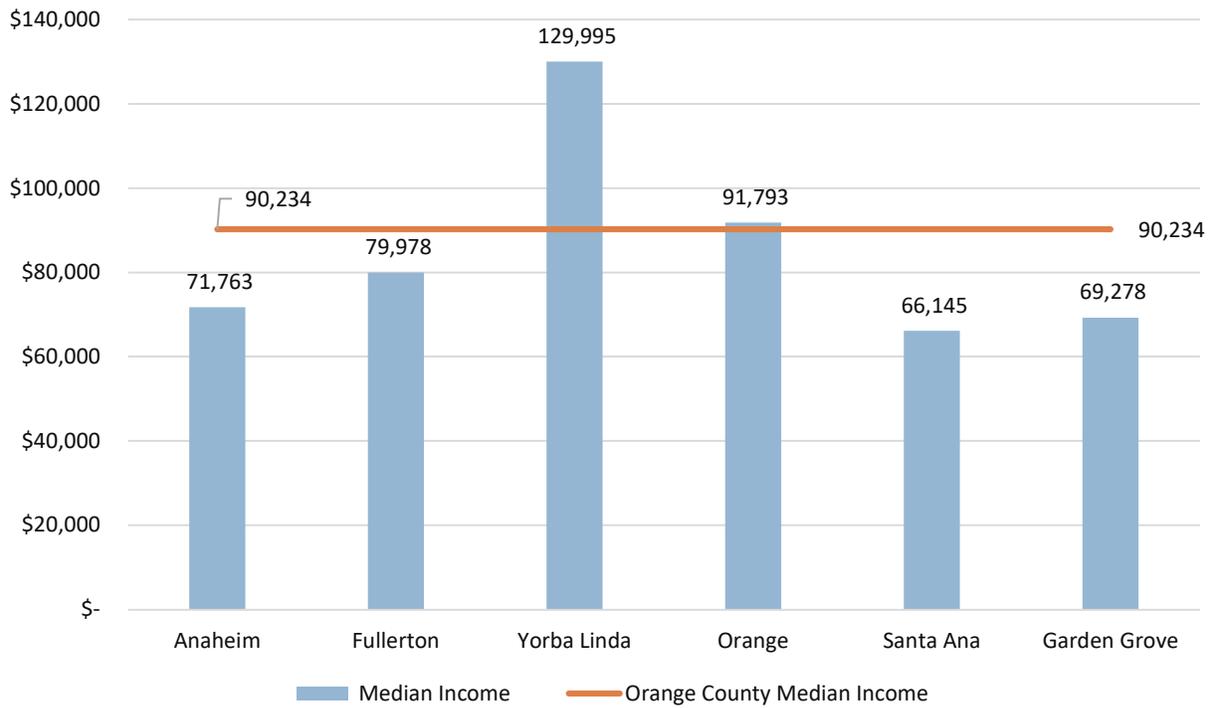
*Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2012-2017.*

**Figure 2-4** shows median household income by cities in Orange County in 2019. The median household income for the Orange County was \$90,234, the City of Orange had a slightly higher median household income of \$91,793.

<sup>1</sup> Federal housing and community development programs typically assist households with incomes up to 80 percent of the AMI and use different terminology. For example, the Federal Community Development Block Grant (CDBG) program refers households with incomes between 51 and 80 percent AMI as moderate income (compared to low-income based on State definition).



Figure 2-4: Median Household Income by City, 2019



Source: American Community Survey, 5-Year Estimates, 2019.

**Table 2-13** displays Orange and nearby cities’ median incomes and the percent above or below the county median income. As displayed in Figure 2-4, the City of Orange has a slightly higher median income than the County. Orange’s median household income was two percent higher than the County. The City of Orange and Yorba Linda had median incomes higher than the county.

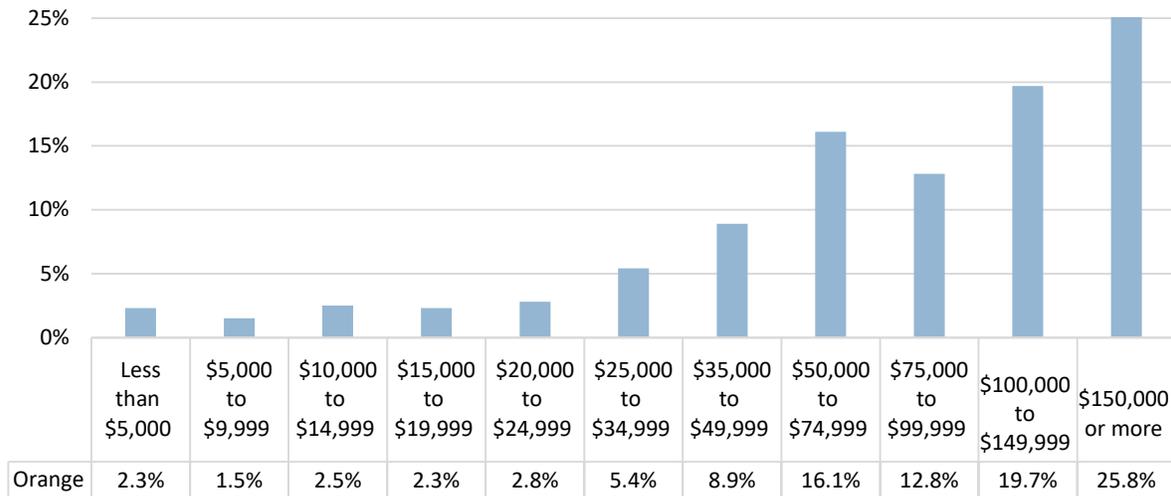
Jurisdiction	Median Income	Percent Above/Below Regional Median
Anaheim	71,763	-25.7%
Fullerton	79,978	-12.8%
Yorba Linda	129,995	30.6%
<b>Orange</b>	<b>91,793</b>	<b>1.7%</b>
Santa Ana	66,145	-36.4%
Garden Grove	69,278	-30.2%
County of Orange	90,234	--

Source: American Community Survey, 5-Year Estimates, 2019.



Figure 2-5 displays income distribution in Orange. According to Figure 2-5, persons who make more than \$50,000 per year have higher percentages than those who make less than \$50,000 per year. Those who made over \$150,000 composed the largest individual income category at 25.8 percent. Overall, majority of employed persons in the City of Orange fall into the moderate to above moderate-income categories, specifically, with higher percentages making over \$100,000 per year.

Figure 2-5: Orange Income Distribution



Source: American Community Survey, 5-Year Estimates, 2019.

## D. Housing Problems

The CHAS developed by the Census Bureau for HUD reports housing needs data by income level for different types of households in Orange. The most recent available CHAS data for Orange was published in August 2020 and was based on 2006-2017 ACS data. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burdens, including utilities, exceeding 30 percent of gross income; or
- Severe housing cost burdens, including utilities, exceeding 50 percent of gross income.

The types of housing problems identified in CHAS data vary according to household income, type, and tenure (**Table 2-14**). These include:

- In general, owner-occupied households had a lower level of housing problems (30.6 percent) than renter-occupied households (58.4 percent).
- Approximately 13.5 percent of owner-occupied households report having a severe housing problem, whereas almost 39.6 percent of renters reported a severe housing problem. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.
- Overall, 42.6 percent of all households reported at least one housing problem and 24.7 percent of all households reported at least one severe housing problem.



**Table 2-14: Housing Assistance Needs of Lower Income Households**

Housing Problem Overview*	Owner		Renter		Total	
	Households	Percent	Households	Percent	Households	Percent
Household has at least 1 of 4 Housing Problems	7,420	30.6%	10,720	58.4%	18,140	42.6%
Household has none of 4 Housing Problems	16,670	68.7%	7,365	40.1%	24,035	56.4%
Cost Burden not available, no other problems	190	0.8%	260	1.4%	450	1.1%
<b>Total</b>	<b>24,280</b>	<b>57%</b>	<b>18,345</b>	<b>43%</b>	<b>42,625</b>	<b>100%</b>
Severe Housing Problem Overview**	Owner		Renter		Total	
	Households	Percent	Households	Percent	Households	Percent
Household has at least 1 of 4 Severe Housing Problems	3,270	13.5%	7,260	39.6%	10,530	24.7%
Household has none of 4 Severe Housing Problems	20,820	85.7%	10,825	59%	31,645	74.2%
Cost Burden not available, no other problems	190	0.8%	260	1.4%	450	1.1%
<b>Total</b>	<b>24,280</b>	<b>57%</b>	<b>18,345</b>	<b>43%</b>	<b>42,625</b>	<b>100%</b>

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2012-2017.  
 \* The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.  
 \*\* The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

## 1. Overcrowding

“Overcrowding” is generally defined as a housing unit occupied by more than one person per room in housing unit (including living room and dining rooms, but excluding hallways, kitchen, and bathrooms). An overcrowding can be caused by lack of affordable housing (which forces more than one household to live together) and/or a lack of available, adequately sized housing units. Overcrowding is an indicator of inadequate supply of affordable housing, especially for large families.

Overcrowded and severely overcrowded households contribute to faster rates of deterioration due to more intensive use of individual housing units. The faster rates of deterioration are caused by excessive wear and tear, and the potential cumulative effect of overburdening infrastructure systems and exceeding service capacities. Furthermore, overcrowding in neighborhoods contributes to overall declines in social cohesion and environmental quality. Such decline can often spread geographically from housing units to neighborhoods and impact the overall quality of life and the economic vitality of a community.



**Table 2-15: Overcrowding by Tenure in Orange**

Housing Unit Tenure	Overcrowded Housing Units (1.0 to 1.50 persons/room)		Severely Overcrowded Housing Units (>1.51 persons/room)		Total Overcrowded Occupied Housing Units	
	Number of Units	Percent of Total Occupied Housing Units	Number of Units	Percent of Total Occupied Housing Units	Number of Units	Percent of Total Occupied Housing Units
Owner Occupied	356	0.83%	180	0.42%	536	1.24%
Renter Occupied	1825	4.24%	814	1.89%	2639	6.13%
<b>Total</b>	<b>2181</b>	<b>5.06%</b>	<b>994</b>	<b>2.31%</b>	<b>3175</b>	<b>7.37%</b>

*Source: American Community Survey, 5-Year Estimates, 2019.*

Table 2-15 displays incidents of overcrowding in the City of Orange. These data show that overcrowding disproportionately affects renters, with just over six percent of renter-occupied units overcrowded compared to 1.2 percent of owner-occupied units.

As shown in Table 2-16, renters were the primary group affected by overcrowding in nearby cities. In Santa Ana about 22 percent of all occupied units were overcrowded, renters-occupied units, compared to about 8 percent of owner-occupied units, a nearly tripled increase. In comparison to the City of Orange, Yorba Linda had the lowest percentage of overcrowded units for both renter and owner-occupied units showing under one percent overcrowding. Overall, the County of Orange shows under ten percent overcrowding, as well as predominantly renter-occupied overcrowded units.

**Table 2-16: Overcrowded Housing Units by Tenure**

Jurisdiction	Owner Occupied Overcrowded Units (>1.0 persons/room)		Renter Occupied Overcrowded Units (>1.0 persons/room)	
	Number of Units	Percent of Total Occupied Units	Number of Units	Percent of Total Occupied Units
Anaheim	3018	2.97%	13370	13.15%
Fullerton	866	1.89%	3523	7.69%
Yorba Linda	143	0.63%	192	0.85%
<b>Orange</b>	<b>536</b>	<b>1.24%</b>	<b>2639</b>	<b>6.13%</b>
Santa Ana	6103	7.96%	16839	21.98%
Garden Grove	2261	4.73%	4838	10.13%
County of Orange	21886	2.11%	69796	6.73%

*Source: American Community Survey, 5-Year Estimates, 2019.*



## 2. Overpayment (Cost Burden) In Relationship to Income

State and federal guidelines indicate that a household paying more than 30 percent of its income for housing is overpaying. Overpayment for housing can create an imbalance in a household’s overall budget. Evaluating incidents of overpayment can influence the supply and demand of housing.

Per the Department Housing and Urban Development CHAS report (2012-2016), shown below in **Table 2-17**, over half of households in Orange experience some type of cost burden or housing overpayment. Households with an income less than or equal to 30 percent the County Area Median Income (AMI) experienced cost burdened at a higher overall percentage (19.1 percent). The data shows that as income increases, households are less likely to experience a cost burden. For example, households with an income of 80 percent of the AMI to 100 percent, made up just 10.9 percent of all households and just about 4.2 percent of households with a cost burden. Additionally, households with an income of 100 percent or above the AMI who experienced a housing cost burden made up 44.8 percent of all households and about five percent of households experiencing a cost burden. Overall, lower income renters were disproportionately affected by cost burdens; the data shows that for each income category.

**Table 2-17: Summary of Housing Overpayment**

Income by Cost Burden	Owner				Renter			
	Cost Burden > 30%	% of Tot. HH <sup>(1)</sup>	Cost Burden > 50%	% of Tot. HH	Cost Burden > 30%	% of Tot. HH	Cost Burden > 50%	% of Tot. HH
Household Income is less-than or = 30% AMI <sup>(2)</sup>	1,015	2.4%	770	1.8%	3,325	7.8%	3,025	7.1%
Household Income >30% to less-than or = 50% AMI	1,210	2.8%	830	1.9%	2,615	6.1%	1,315	3.1%
Household Income >50% to less-than or = 80% AMI	2,115	5.0%	705	1.7%	2,490	5.8%	515	1.2%
Household Income >80% to less-than or = 100% AMI	935	2.2%	285	0.7%	530	1.2%	40	0.1%
Household Income >100% AMI	1,670	3.9%	110	0.3%	345	0.8%	0	0.0%
<b>Total</b>	<b>6,945</b>	<b>16.3%</b>	<b>2,700</b>	<b>6.3%</b>	<b>9,305</b>	<b>21.8%</b>	<b>4,895</b>	<b>11.5%</b>

Source: Source: U.S. Department of Housing and Urban Development, *Comprehensive Housing Affordability Strategy 2012-2017*.

Notes: (1) % of tot. HH = Percent of Total Households in Orange

(2) AMI = Area Median Income, this is calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. AMI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made.

\* Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.



## E. Special Needs Groups

State law identifies certain households that historically have more difficulty in finding adequate and affordable housing due to special needs. Special needs populations include seniors, persons with disabilities, female-headed households, large households, and farmworkers. Many persons within these special needs groups often have lower than average incomes because of their special needs.

Special needs may be related to a person’s employment and income, family characteristics, disability and household characteristics, or other factors. Consequently, certain residents in Orange may experience higher incidences of housing overpayment (cost burden), overcrowding, or other housing problems. Special needs groups required to be analyzed in the Housing Element include the elderly, persons with physical and developmental disabilities, persons experiencing homelessness, single parents, large households, and farmworkers (**Table 2-18**). Many of these special needs groups overlap, for example, many farmworkers are migrant workers, and many elderly people have a self-care limitation of some type.

<b>Special Needs Group</b>	<b>Count</b>	<b>Percent of Total Households</b>	<b>Percent of Total Population</b>
Senior Headed Households	9,753 households	22.6%	--
Households with Seniors (65 years and over)	11,736 households	27.2%	--
Seniors Living Alone	3,569 households	8.3%	--
Persons with Disabilities	10,974 persons	--	8.1%
Large Households (5 or more persons per household)	5,946 households	13.8%	--
Single-Parent Households	3,053 households	7.1%	--
Single-Parent, Female Headed Households with Children (under 18 years)	2,234 households	5.2%	--
People Living in Poverty	16,142 persons	--	12.1%
Farmworkers*	305 persons	--	0.4%
Homeless**	341 persons	--	0.2%

*Source: American Community Survey, 5-Year Estimates, 2019; Orange County Point in Time Count, Everyone Counts Report 2019.*

*\* Farmworker data is taken of the population 16 years and over, not total population.*

*\*\* The Everyone Counts report is updated annually, therefore the most recent data is from 2019, and there is no percentage of total population available.*



## 1. Seniors

The senior population, generally defined as persons aged 65 years or older, traditionally have limited or fixed incomes, experience higher average health care costs, commonly have mobility and self-care limitations, are transit dependent, and live alone. Unique housing needs for the senior population include affordable housing, supportive housing (such as managed care facilities), group homes, and housing with a service component.

Incomes of many seniors often creates difficulty in finding affordable housing. **Table 2-19** shows that 17,076 persons were age 65 and over in Orange in 2019, a total of 12.2 percent of the total population. This percentage is lower compared to neighboring cities and the region as a whole; the highest being 18 percent in Yorba Linda and the lowest being 9 percent in Santa Ana.

<b>Jurisdiction</b>	<b>Population Count</b>	<b>Percent</b>
Anaheim	40,694	11.6%
Fullerton	18,561	13.3%
Yorba Linda	12,165	18%
<b>Orange</b>	<b>17,076</b>	<b>12.2%</b>
Santa Ana	29,918	9%
Garden Grove	24,700	14.3%
County of Orange	455,105	14.4%

*Source: American Community Survey, 5-Year Estimates, 2019.*

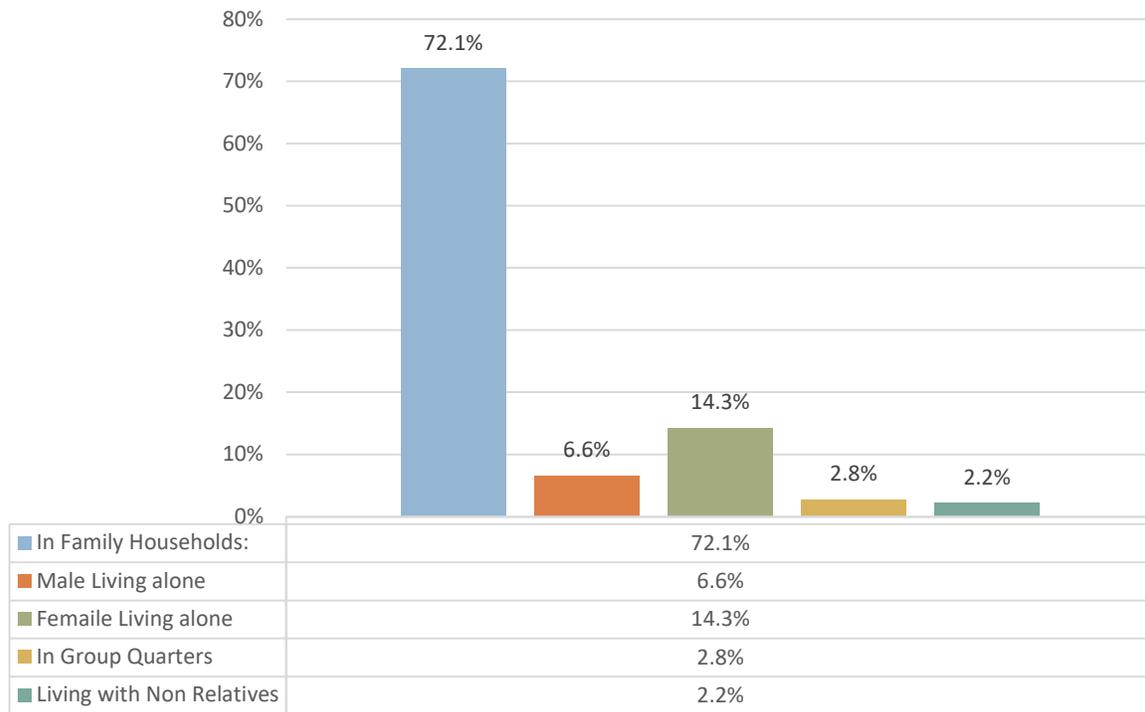
Seniors also have varying housing needs, specifically those who are living alone. **Figure 2-6** below displays housing characteristics for seniors living alone in Orange using 2019 ACS data. The data above shows that there is a total of 17,076 seniors living in the City, of those seniors, majority live in family households (about 72 percent). For seniors who live in non-family households, about 2 percent lived with non-relatives, 6.6 percent were Male householders who lived alone, and 14.3 percent were female households who lived alone. Additionally, about 2 percent of the population over 65 years of age lived in group quarters.

The City currently has eight total affordable housing developments for senior residents, as provided in Table 3-33b. This includes 192 deed-restricted affordable units ranging from one- to three-bedroom units. This Housing Element’s Section 4: Housing Plan includes Housing Policy Action 2D which establishes regulatory incentives to develop senior housing that may include independent living options and/or assisted living with on-site services and memory care facilities.

In addition, the City partners with the Orange Elderly Services, Inc. non-profit community-based organization to provide services (activities, events, meals, and transportation) to residents at the Orange Senior Center. The Senior Transportation Program is offered by the Orange Senior Center to subsidize taxi travels for seniors over 60 years of age to/from medical appointment, pharmacy, grocery store, or the Orange Senior Center.



Figure 2-6: Household Characteristics, Percent of Population Aged 65 Years+



Source: American Community Survey, 5 Year Estimates, 2019.

In addition to overpayment problems faced by seniors, seniors have a higher incident of disabilities. In 2019, the American Community Survey reported 5,019 seniors having a disability. The most common reported disabilities were ambulatory disabilities, independent living disabilities and hearing disabilities.

## 2. Persons with Physical and Developmental Disabilities

Physical and developmental disabilities may limit a person's barrier-free access to traditionally designed housing units. Physical and/or developmental disabilities may influence a person's ability to earn income, restrict mobility, or create self-care limitations. Lower income persons with disabilities commonly require housing assistance and services. Housing needs for disabled persons can be compounded by limitations imposed by building designs. Accessibility and transportation considerations and location factors can affect the cost and availability of housing. Special needs households with wheelchair-bound or semi-ambulatory individuals require American Disabilities Act (ADA) compliance and specific accommodations such as ramps, holding bars, special bathroom designs, wider doorways, lower cabinets, elevators, and other interior and exterior design features.

Housing opportunities for persons with disabilities can be addressed through the provision of affordable, barrier-free housing. Rehabilitation assistance can be targeted toward renters and homeowners with disabilities for unit modification to improve accessibility.

The 2019 ACS identifies six disability types: hearing disability, vision disability, cognitive disability, ambulatory disability, self-care disability and independent living disability. The Census and the ACS provide clarifying questions to determine persons with disabilities and differentiate disabilities within the



population. The ACS defines a disability as a report of one of the six disabilities identified by the following questions:

- Hearing Disability: Is this person deaf or does he/she have serious difficulty hearing?
- Visual Disability: Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- Cognitive Difficulty: Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- Ambulatory Difficulty: Does this person have serious difficulty walking or climbing stairs?
- Independent Living Difficulty: Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor’s office or shopping?

According to the 2019 ACS, about eight percent of Orange’s population reported a disability. Of that eight percent, ambulatory difficulty represented the highest at 48.9 percent of persons reporting a disability (Table 2-20). Hearing and self-care disabilities totaled about 54.3 percent of the population with a disability, cognitive disabilities represented 39.1 percent and independent living difficulties represent 38.4 percent. Table 2-20 also shows that persons age 65 or over had the highest percentage of disabilities.

<b>Disability Type</b>	<b>Under age 18 with a Disability</b>	<b>Ages 18 to 64 with a Disability</b>	<b>65 years and Over with a Disability</b>	<b>Total</b>	<b>Percent of Population with Disability</b>	<b>Percent of Total Population</b>
Population with a Hearing Difficulty	182	985	1,999	<b>3,166</b>	28.9%	2.30%
Population with a Vision Difficulty	95	717	722	<b>1,534</b>	14.0%	1.10%
Population with a Cognitive Difficulty	526	2,323	1,437	<b>4,286</b>	39.1%	4.20%
Population with an Ambulatory Difficulty	204	1,926	3,236	<b>5,366</b>	48.9%	4.20%
Population with a Self-care Difficulty	293	864	1,633	<b>2,790</b>	25.4%	2%
Population with an independent Living Difficulty	--	1,811	2,399	<b>4,210</b>	38.4%	4.00%
<b>Total</b>	<b>718</b>	<b>5,237</b>	<b>5,019</b>	<b>10,974*</b>	--	<b>8%</b>

*Source: American Community Survey, 5-Year Estimates, 2019.*  
*\*This number may not reflect persons who have more than one reported disability.*



State law requires Housing Elements discuss housing needs for persons with developmental disabilities. As defined by federal law, a “developmental disability” means severe, chronic disability in an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5 percent. This equates to 2,104 persons in the City of Orange with developmental disabilities, based on the 2017 America Community Survey.

Per Section 4512 of the Welfare and Institutions Code a "developmental disability" means a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes intellectual disability, cerebral palsy, epilepsy, and autism. This term also includes disabling conditions found to be closely related to intellectual disability or to require treatment like that required for individuals with intellectual disability but shall not include other handicapping conditions that are solely physical in nature.

As of November 2019, The State Department of Developmental Services (DDS) provides community-based services to approximately 331,999 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. According to DDS, for fiscal year 2017 to 2018, the Regional Center for Orange County offered five Home and Community-Based Service centers including, the Anaheim Adult Day Cat Inc., Goodwill of Orange County, Hi Hopes Identity Discovery Foundation, Inc., Mayfair Adult Day Care, and Vocational Visions. As of June 2018, the Orange County Regional Center served 22,352 persons with developmental disabilities. Sixty-five percent of the persons served by the OCRC were male. Persons from 0-2 years of age compromised 22 percent of OCRC’s clients, 41 percent of persons served were 3-21 years the largest age group served. The majority of the persons served (about 35 percent) were White, about 32 percent reported Hispanic, 15 percent reported Other, 14 percent reported Asian and persons who reported Black, Filipino, Native American and Polynesian each totaled under four percent.

Many people with developmental disabilities live and work independently within conventional housing environments. Individuals with more severe developmental disabilities may require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for persons with



developmental disabilities is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 (veterans) homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating ‘barrier-free’ design in all, new multi-family housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for residents with disabilities. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

**Section 4: Housing Plan** of this Housing Element includes Housing Policy Action 4E which establishes the City’s support of persons with developmental disabilities to live in integrated community settings. Housing Policy Action 4F also includes an amendment to the City’s Municipal Code to be compliant with State law as it relates to zoning requirements of residential care facilities serving seven or more persons.

### 3. Large Households

Large households are defined as those consisting of five or more members. Large households typically have a limited supply of locally available, adequately sized and affordable housing units. It is common for lower income large households to reside in smaller units with an inadequate number of bedrooms. This frequently results in overcrowded conditions and can contribute to faster rates of deterioration.

Availability of large households is a greater challenge for renters, because multi-family rental units are typically physically smaller than single-family ownership units. While apartment complexes offering two and three bedrooms are common, apartments with four or more bedrooms are rare. Large households generally experience overcrowded conditions compared to smaller households. Additionally, throughout the region single-family homes with higher bedroom counts, whether rental or ownership units, are rarely affordable to lower income households.

**Table 2-21** displays the American Community Survey’s 2019 data for Large Households broken down by tenure. According to the data large households made up 13.8 percent of all households in the City. Among the large households, five-person households were most common (7.99 percent) and six and seven-person households were both just over five percent. When divided up by tenure, the data shows that renter and owner-occupied large households had similar percentages.

Household Size	Owner		Renter		Total	
	Households	Percent	Households	Percent	Households	Percent
5-Person Household	1,924	4.47%	1,516	3.52%	3,440	7.99%
6-person household	601	1.40%	882	2.05%	1,483	3.44%
7-or-more person Households	472	1.10%	551	1.28%	1,023	2.37%
<b>Total</b>	<b>2,997</b>	<b>6.96%</b>	<b>2,949</b>	<b>6.85%</b>	<b>5,946</b>	<b>13.80%</b>

*Source: American Community Survey, 5-Year Estimates, 2019.*



According to the American Community Survey’s 2019 data, there are approximately 21,564 total housing units with 6 or more bedrooms. Large housing units with 6 or more bedrooms represent half of the City’s existing housing stock.

In addition, **Section 4: Housing Plan** of this Housing Element includes Housing Policy Action 2C which establishes the City’s continued outreach to private and non-profit housing developers to encourage the development of rental and for-sale housing units for larger families.

#### 4. Single-Parent Households

Single-parent households often require special consideration and assistance due to their greater need for affordable and accessible day care, health care, and other supportive services. Many female-headed households with children are susceptible to having lower incomes than similar two-parent households. Single, female mothers may face social marginalization pressures that can limit their occupational choices and income earning potential, housing options and access to supportive services.

**Table 2-22** displays data breakdown of single parent households in Orange. In total, single parent households make up 7.1 percent of total households. Of the single parent households in Orange, 819 were male headed with no spouse present and the remaining 2,234 were female headed with no spouse present. Overall, nearly a quarter of single parent households were living below the poverty line (22 percent).

<b>Jurisdiction</b>	<b>Single Parent-Male, No Spouse Present</b>	<b>Single Parent-Female, No Spouse Present</b>	<b>Single Parent Households Living in Poverty</b>	<b>Single Parent Households</b>	<b>Percent of Total Households</b>
Orange	819	2,234	671	3,053	7.1%

*Source: American Community Survey, 5-Year Estimates, 2019.*

The City of Orange provides a number of community programs and resources for children which may assist single-parent households. The City of Orange, in partnership with the Youth Centers of Orange, offers after-school enrichment for children Kindergarten to 8th Grade. This after-school program includes group activities, homework help, a nutritional program, and a special focus on Character Development for a nominal fee. All scheduled programs are in conjunction with the OUSD academic calendar. After-school recreation programs are offered throughout the community at El Camino Real Park, Grijalva Park, and Killefer Park. The Teen Action Committee (T.A.C.) also offers activities and community projects for teens entering the 7<sup>th</sup> grade through 15 years of age.

Other community organizations and schools that provide resources for children in the City include:

- Youth Centers of Orange
- St. John’s Lutheran School District
- Orange Unified School District
- Covenant Christian School
- Oakridge Private School



## 5. Farmworkers

Farmworkers are defined as persons whose primary incomes are earned through seasonal agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers and move throughout the year from one harvest location to the next.

The United States Department of Agriculture, National Agriculture Statistics provides data on hired farm labor across the United States. The data is compiled at both a State and County level. Within Orange County, a total of 99 farms reportedly hired 1,772 workers in 2017. Permanent workers, those who work 150 days or more, represent the largest category of workers with 1,106 workers (62 percent). A total of 666 workers (38 percent) are considered seasonal and work less than 150 days. Orange County reported 340 migrant workers (19 percent) with full time hired labor in 2017. In addition, the County reported 176 unpaid workers.

The 2019 ACS data reported that there were 5,407 persons employed in natural resources, construction, and maintenances occupations; of those, 205 persons were employed in the farming, fishing, and forestry industries. Because of the low percentage of persons employed in the agriculture and farming industries, the City of Orange does not provide specific housing for this population.

**Section 4: Housing Plan** of this Housing Element includes Housing Policy Action 4I which will result in an update to the City's Municipal Code to comply with the provisions for farmworker housing set forth in the Employee Housing Act.

## 6. Extremely Low-income Households and Poverty Status

The 2013-2017 CHAS data identifies 8,410 low-income households and 4,990 very low-income households. Very low-income households are those households that earn 50 percent or less of the median family income (MFI) for Orange County. Extremely low-income households are those households which earn less than 30 percent of the MFI. There are approximately 5,490 extremely low-income households in Orange (renters and owners). **Table 2-23** below, includes data characterizing affordability and cost burden for various income groups.

According the 2019 ACS, 16,142 persons were reported to be living in poverty, about 12.1 percent of the population. **Figure 2-7** below displays the percent on persons living in poverty by race or ethnicity and Hispanic or Latino origin, based on own race/ethnicity. The majority of persons living in poverty in Orange reported Hispanic or Latino (16.2 percent), Two or More Races (15.6 percent), and Some Other Race (13.9 percent). About 12 percent of person who reported White also reported living in poverty, and the Native Hawaiian and Other Pacific Islander population reported under five percent of persons living in poverty.



**Table 2-23: Housing Problems for All Households (by Tenure)**

Income Category	Income by Housing Problem	Owner Households		
		Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available, no other Housing Problem
Extremely Low-Income	Household Income is less-than or = 30%	1,025	355	190
Very Low-Income	Household Income >30% to less-than or = 50% AMI	1,215	800	--
Low-Income	Household Income >50% to less-than or = 80% AMI	2,205	1,655	--
Moderate-Income	Household Income >80% to less-than or = 100% AMI	1,060	1,300	--
Above Moderate-Income	Household Income >100% AMI	1,920	12,560	--
<b>Total</b>		<b>7,420</b>	<b>16,670</b>	<b>190</b>
Income Category	Income by Housing Problem	Renter Households		
		Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems	Cost Burden not available, no other Housing Problem
Extremely Low-Income	Household Income is less-than or = 30%	3,355	305	260
Very Low-Income	Household Income >30% to less-than or = 50% AMI	2,695	280	--
Low-Income	Household Income >50% to less-than or = 80% AMI	3,220	1,330	--
Moderate-Income	Household Income >80% to less-than or = 100% AMI	775	1,520	--
Above Moderate-Income	Household Income >100% AMI	680	3,930	--
<b>Total</b>		<b>10,720</b>	<b>7,365</b>	<b>260</b>
<b>Total Households (Owner and Renter)</b>		<b>18,140</b>	<b>24,035</b>	<b>450</b>

Source: Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) 2013-2017.

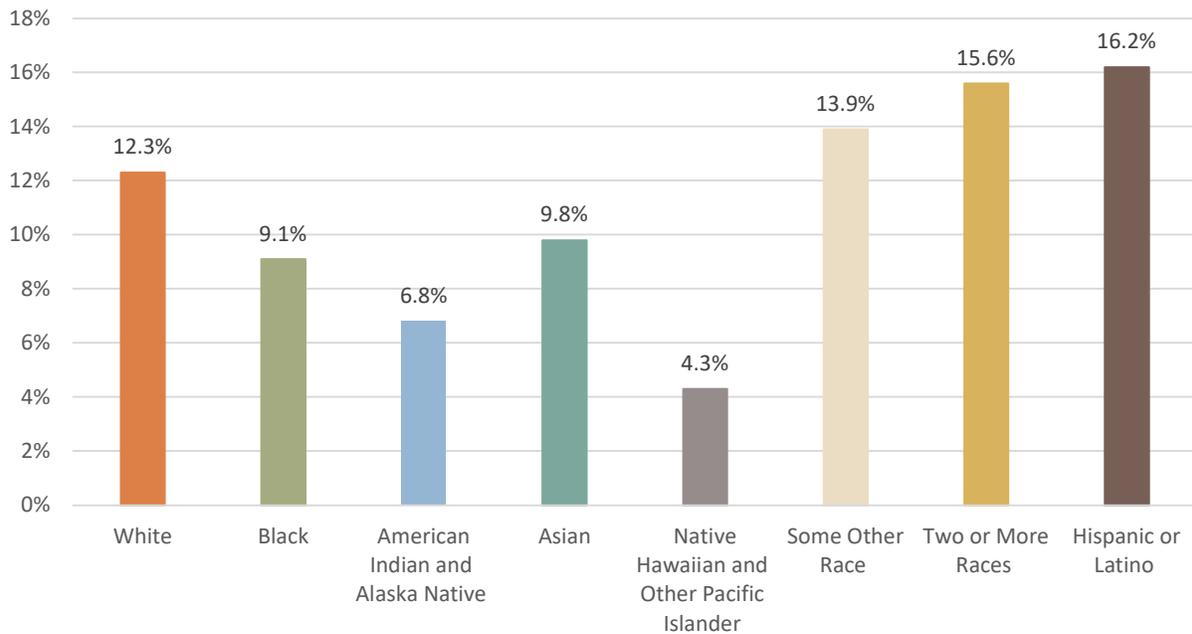
\* The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.

\*\* The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and cost burden greater than 50%.

Note: AMI = Area Median Income, this is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. AMI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments that are made.



**Figure 2-7: Percent below Poverty Level, by Race and Hispanic or Latino Origin**



*Source: American Community Survey, 5-Year Estimates, 2019.*

*Note: The chart reports percentage of own population who are reported to have incomes below poverty level.*

The City currently has 34 total affordable housing developments, as detailed in Table 3-33b. This includes 1,524 deed-restricted affordable units ranging from studios to three-bedroom units available for lower-income households, seniors, and workforce housing. This Housing Element’s **Section 4: Housing Plan** includes a number of Housing Policy Actions which promote the development of affordable housing units throughout the City as well as resources for households in need.

## **7. Persons Experiencing Homelessness**

Throughout the country and Orange County region, homelessness has become an increasingly important issue. Factors contributing to the rise in homelessness include, increased unemployment and underemployment, a lack of housing affordable to lower and moderate-income persons (especially extremely low-income households), reductions in public subsidies to the poor, and the de-institutionalization of the mentally ill.

State law mandates that municipalities address the special needs of homeless persons within their city’s boundaries. The following provides an updated description and new changes for “homelessness” as defined by the U.S. Department of Housing and Urban Development (HUD):

- People who are living in a place not meant for human habitation, in emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided. The only significant change from existing practice is that people are now considered homeless if they are exiting an institution where they resided for up to 90 days (it was previously 30 days) and are in shelter or a place not meant for human habitation immediately prior to entering that institution.



- People who are losing their primary nighttime residence, which may include a motel or hotel or a doubled-up situation, within 14 days and lack resources or support networks to remain in housing. HUD had previously allowed people who were being displaced within 7 days to be considered homeless. The proposed regulation also describes specific documentation requirements for this category.
- Families with children or unaccompanied youth who are unstably housed and likely to continue in that state. This is a new category of homelessness, and it applies to families with children or unaccompanied youth who have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment.
- People who are fleeing or attempting to flee domestic violence, have no other residence, and lack the resources or support networks to obtain other permanent housing. This category is similar to the current practice regarding people who are fleeing domestic violence.

This definition does not include persons living in substandard housing (unless it has been officially condemned); persons living in overcrowded housing (for example, doubled up with others); persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge); or persons who may be at risk of homelessness (for example, living temporarily with family or friends.)

The Point in Time Count is conducted by the County of Orange in accordance with the U.S. Department of Housing and Urban Development guidelines. The count provides information on where homeless individuals are in the County. Over 1,000 volunteers across the County counted 6,860 individuals experiencing homelessness; of those, 2,899 were sheltered and 3,961 were unsheltered. The 2019 Count was conducted in April of 2019 and individual city results are shown in **Table 2-24a**. Santa Ana had the largest homeless population of the North Orange County cities and about 20 percent more than the City of Orange. Orange's homeless population totaled 341 and five percent of the County's total homeless population count. According to the Point in Time Count results, Orange County saw a 121 percent increase in the number of emergency shelter beds from 2017 to 2019, an increase in 1,390 beds in total. Additionally, **Table 2-24b** shows the 2022 Count results – including a reduction of persons experiencing homelessness of about 27 percent since 2019 (a reduction of 91 persons experiencing homelessness). In comparison, the County as a whole also saw a decrease by about 17 percent (1,142 persons).

According to the County's Point in Time Count, persons experiencing homelessness included 110 unsheltered families (152 adults and 244 children). Approximately half of families experiencing homelessness became unsheltered for the first time during the past 12 months and over 60 percent were living in a vehicle. A total of 275 transitional age youth were counted as experiencing homelessness countywide and about half identified as Hispanic or Latino. Approximately 12 percent of transitional age youth experiencing homelessness are chronically homeless compared to just under half of all adults experiencing homelessness. A total of 612 seniors and 311 veterans were counted countywide. Black or African American individuals and families represent just 2 percent of the County's population, according to the U.S. Census Bureau; however, Black or African American individuals and families represented 8.41 percent of unsheltered homelessness and 15 percent of sheltered homelessness. Hispanic or Latino families



were also overrepresented in the count and represented 57 percent of unsheltered homelessness and 49.8 percent of sheltered homelessness in the County.

**Table 2-24a: Homeless Count by Jurisdiction (2019)**

Jurisdiction	Unsheltered	Sheltered	Total	% of County
Anaheim	694	508	1,202	17.5%
Fullerton	308	165	472	6.8%
Yorba Linda	1	0	1	0.01%
<b>Orange</b>	<b>193</b>	<b>148</b>	<b>341</b>	<b>5.0%</b>
Santa Ana	830	939	1,769	25.8%
Garden Grove	163	62	225	3.3%
County of Orange	3,961	2,899	6,860	100%

*Source: Orange County Point in Time Count, Everyone Counts Report 2019.*

**Table 2-24b: Homeless Count by Jurisdiction (2022)**

Jurisdiction	Unsheltered	Sheltered	Total	% of County	% Change 2019-2022
Anaheim	485	589	1,074	18.8%	-10.6%
Fullerton	202	70	272	4.8%	-42.4%
Yorba Linda	4	0	4	0.1%	300.0%
<b>Orange</b>	<b>134</b>	<b>116</b>	<b>250</b>	<b>4.4%</b>	<b>-26.7%</b>
Santa Ana	508	482	990	17.3%	-44.0%
Garden Grove	278	113	391	6.8%	73.8%
County of Orange	3,057	2,661	5,718	100.0%	-16.6%

*Source: Orange County Point in Time Count, Everyone Counts Report 2022.*

### Partnerships and Initiatives

In collaboration with a number of neighboring Orange County cities, the City of Orange participates in the North Services Planning Area (SPA) partnership. The North SPA Partnership is a joint collaboration that includes two full-service Navigation Centers to provide help to the region’s homeless – the Buena Park Center and the Placentia Center will provide homeless individuals a total of 250 beds, health resources, job skill training, and the ability to reconnect with lost family. These facilities join the two shelters already built by the City of Anaheim, which house another 326 beds.

In addition to participating in the North SPA, Orange has undertaken several other initiatives over the past few years to address local homelessness issue; including partnering with HomeAid of Orange County to develop the Orange Family Care Center. The Orange Family Care Center specializes in serving the needs of families who are experiencing homelessness and has over 55 beds.

The Orange Police Department’s Homeless Engagement, Assistance & Resource Team (HEART) program has been operating since 2013. HEART Officers engage daily with local homeless individuals, working with them one-on-one to help facilitate their re-entry back into mainstream society. The Police Department also



assists in providing resources and assistance through collaborations with local community organizations and agencies such as:

- **Orange County Homeless Services, Orange County Health Care Agency, Orange County Shelter Programs** - The County of Orange coordinates a comprehensive regional Continuum of Care (CoC) strategy that includes the participation of all thirty-four cities in Orange County, County Agencies, the County’s homeless housing and service providers, and other community groups (including non-profits, local governmental agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools, and many other stakeholders) to identify the gaps and unmet needs of the County’s homeless. In addition to organizing, delivering and reporting on housing and services for people who are experiencing homelessness, CoCs are required to complete a Point-In-Time (PIT) count of unsheltered homeless at least once every two years & sheltered annually during the last ten days in January. Data from the one-night PIT count and the longitudinal data collected by the Homeless Management Information System (HMIS) are the primary sources used to measure the progress in meeting the national strategic goal of preventing and ending homelessness. The County also contracts to operate shelter programs in the County, including Bridges at Kraemer Place, Cold Weather Shelter in Santa Ana, and Yale Navigation Center.
- **Food Pantries by Waste Not OC** – Second Harvest Food Bank of Orange County and Community Action Partnership of Orange County Food Bank collect food and distribute it to those in need throughout the community.
- **Lutheran Social Services** - Located in the city of Fullerton, LSS Orange County, serves more than 200 families and individuals per month with emergency and social services. LSS Orange County offers a weekly food pantry and senior grocery program, clothing, hygiene packs, emergency vouchers for hotel, bus, gas and utilities motel/hotel vouchers. Clients are able to receive housing assistance, in depth case management and ongoing support while they navigate to a more stable situation. They also provide specialized counseling and supportive services for women that have been victims of crime.
- **Homeless Intervention Services of OC (HIS-OC)** – HIS-OC runs four programs that assist people who are homeless or at risk of being homeless – 1) Transitional housing program, 2) Combining Housing Education and Skills for Students (CHESS) Program, 3) Home Share OC, 4) Housing Connection Program.
- **Pathways of Hope Food Pantry** - Pathways of Hope leads community efforts to end homelessness in North Orange County. Through different types of housing programs – including shelter, rapid re-housing, permanent supportive housing, and prevention – the agency assists in addressing homelessness for hundreds of community members and neighbors in need each year.
- **Saint Andrew’s Episcopal Church** – Saint Andrew’s provides a range of community services such as - free dinner every Friday night to over 100 people, offering Friday dinner guests with the opportunity to select clean clothes, collecting canned food for the Pathways of Hope food pantry, providing foster children at Orangewood Children’s Home with jeans, blankets, and toiletries, providing diapers, pajamas, and other essential needs for homeless families served by Project Hope, maintaining an urban garden for three local food banks, and assisting women seeking refuge from abusive relationships.
- **Seventh Day Adventist Church** – Providing food bags, clothing, small appliances, and toiletries.
- **The Storehouse** – Providing hot meals and Thursday evenings and a food pantry weekly.



- **Southlands Church** – Southlands distributes food to families in need on the last Saturday of even months.
- **Christ Cathedral** – Providing kitchen and food pantries.
- **Southwest Community Center** - Providing the basic needs of food, clothing, shelter, household items, referral services and other support services to the homeless, low-income, and economically disadvantaged in an effort to enable them to become or retain self-sufficiency.
- **Someone Care Soup Kitchen** - Providing a daily nutritional meal to homeless, unemployed, working poor families, senior citizens, the unemployed or under-employed, the mentally and physically challenged and children. The Soup Kitchen provides meals seven days per week at the facility in Orange County.
- **Welcome Home Ministry** - WelcomeHomeOC is the first housing assistance program tailored to Orange County property owners as well as qualified families, Veterans, foster youth, and seniors in need of permanent housing. Every aspect of this program to end homelessness provides greater ease and control, while treating landlords as equal partners and maximizing opportunities for all.
- **We Care of Los Alamitos** - WE CARE is a non-profit organization that pools the resources of the community to meet the emergency needs of families and individuals such as rental assistance, utility assistance, therapy services, food, personal care items, and more. WE CARE of Los Alamitos is a family support center sponsored by local churches, community groups, corporations and concerned citizens.

### The HUB OC

The City had previously relied on Mary's Kitchen to provide food, resources, showers, laundry, and other resources for persons experiencing homelessness. The City ended its license agreement with the nonprofit in 2021 due to rising crime and safety concerns. To replace the soup kitchen, as of June 2022, the City set up a new hub of homelessness services which was mandated by a federal judge in May 2022 through May 2023. "The HUB OC" oversees continuum of care services on behalf of the City of Orange and manages rental facilities including laundry machines, portable showers, hand washing stations, and portable restrooms to help with personal hygiene – in an effort to reduce the transmission of COVID-19. The HUB OC manages the recruiting, training, and mobilizing the team of volunteers from local churches and the community to help meet the needs of homeless residents in partnership with the City of Orange, the HEART team, and LOVE Orange. A summary of services provided by the HUB OC is listed below:

- Provide initial contact with homeless individuals for intake information;
- Coordinate with the HEART team for entry into Coordinated Entry System (CES) and Homeless Management Information System (HMIS);
- Coordinate efforts with local non-profits to recruit volunteers;
- Provide training to volunteers as listed below:
  - Manage and provide homeless individuals with referrals to shelters
  - Distribute hygiene supplies to homeless individuals
  - Manage the on-site hygiene resources that include laundry, showers, wash stations, and restrooms
  - Manage and provide homeless individuals with access to phone charging stations
  - Provide homeless individuals with referrals to mental, medical, vision, dental, and health care services;



- Provide homeless individuals with referrals to veterinary care services
- Provide homeless individuals with referrals to COVID-19 vaccines
- Provide homeless individuals with referrals to clothes providers including resources from Full Circle
- Provide homeless individuals with voucher assistance and referrals to bus or other modes of transportation
- Provide the children of homeless individuals with referrals to free after school care through the Youth Centers of Orange

The goal of the HRC in the long run is to continue to offer the same services it does now, but adjust meals to a more nutritional, medical, and supplemental based service. Current services such as showers and laundry will continue to be offered and will encourage the clients to attend a class, workshop, or other empowering services offered at the site through one of its partners or volunteers. Currently, the HUB OC has over 40 partners and is continuously seeking out additional partners to expand services and resources for the homeless community at no additional cost. The HUB OC develops its partnerships by reaching out to schools, non-profits, and local businesses and donors directly and sharing the mission and vision of the HRC with the goal of receiving continuous or one-time financial or in-kind donations. Partnerships are also developed through word of mouth from volunteers and current partner organizations already providing services at the site. If the outreach results in a long-term partnership, the HUB OC will create agreements for the service or donation to be provided at no-cost at the HRC, including those services already being offered.

The HRC has already started to secure partnerships for the classes, workshops, and other empowering services it will offer at the site in the long-term. Examples include:

- Work Program focused on creating healthy work ethics and facilitating project participation throughout the City to develop workforce skills;
- Classes on health care for individuals living on the streets by nurses from local state university.
- Support classes for mothers including lactation and birthing that will also offer essential items that can be purchased using EBT and WIC onsite;
- Resume building and application assistance by professionals and volunteers in our community;
- Drug and addiction programs through Celebrate Recovery/AA that offers video and workbook curriculum, sponsors, and success chips;
- Men's and Women's support groups for holistic well-being;
- Associate Degree Program through a local college that clients will be able to complete at the HRC through the use of donated computers;
- Nutritional courses by a food scientist;
- Outreach courses for volunteers and local businesses wanting to understand the difficulties of the homeless population and discover ways in which they can help.

### **Investments**

The City is amending the 2019 Action Plan to appropriate \$1,108,070 in Community Development Block Grant funds from the Coronavirus Aid, Relief, and Economic Security Act for the Homeless Outreach Program. The Homeless Outreach Program will conduct outreach to the homeless population in Orange



and refer them to homeless-related services including case management and housing navigation centers. The program will complement the homeless outreach efforts undertaken by the HEART and Bike Teams. **Section 4: Housing Plan** of this Housing Element includes Housing Policy Action 4B establishing the City's continued support of local and inter-jurisdictional efforts to reduce temporary and chronic homelessness.

Additionally, the City plans to distribute HOME-ARP funds in accordance with the priority needs identified in its need assessment and gap analysis. Consistent with the needs of the homeless community, the City will distribute approximately 95% of the funds to The HUB OC to serve the needs of the homeless on a reimbursement basis. The balance of the funds (5%) will be used for administration purposes.

The City will enter into a new subrecipient agreement with the HUB OC to fund its operation until the funds are fully exhausted. In order to more efficiently and effectively provide services, the HRC will move from its temporary location on the sidewalk of Struck Avenue to the site of where the previous homeless service provider was located. The City will be relocating a mobile office unit to the newly renovated site that will provide continuum of care providers space to meet with clients and allow for more privacy, a need expressed by service providers at the HRC.

Once the HOME-ARP funds are exhausted, the HRC is planning to modify the current operations of the site as part of the long-term plan to avoid interruption in services and reduce operational costs. The HUB endeavors to work strategically with partners in the local and global communities and organizations to provide services free of charge and is working to acquire donations for resources. Additionally, partnerships are being developed in order to offer classes and workshops at the site to help clients towards long term employment and housing stability. The HUB and the City will work collaboratively to seek grant funding to continue the ongoing operation of the facility.

## 8. Students

There are multiple colleges and universities located in and around the City of Orange, including Chapman University, California State University Fullerton, and Santiago Canyon College. According to the 2019 ACS, 38.8 percent of Orange's population was enrolled in college or graduate school. Of those between ages 18 and 24 enrolled in a college program, 66 percent are female. Housing may be provided on campus, but students often seek alternate housing options within the same City. Considering the number of students enrolled in school – over 10,000 at Chapman University – students contribute an important segment of the population. Students can be low-income and may be affected by a lack of affordable housing options, especially within easy commuting distances from campus. Students may seek shared housing situations to lower expenses contributing to overcrowding. The access to affordable housing may influence a student's choice to stay or leave after graduating, which can in turn affect the region's economy. College students offer specialized skills that contribute to the health of the local economy. A lack of affordable housing may contribute to their departure and the City's loss of additional participation in the labor force.

**Section 4: Housing Plan** of this Housing Element includes Housing Policy Action 21 establishing the City coordination with Chapman University to respond to housing needs of students in the City and encouraging the development of on-campus housing.



## F. Housing Stock Characteristics

Housing needs for a community are determined by characteristics of the housing stock, including growth, type, availability and tenure, age and condition, housing costs, and affordability. This section details the housing stock characteristics of Orange and identifies how the current housing stock meets the needs of its current and future residents.

### 1. Housing Growth

According to the 2010, 2015, and 2019 ACS, the Orange housing stock grew from 44,217 to 44,229 (**Table 2-25**). The ACS data provides estimates based on the U.S. Census and surveys and may therefore not reflect the exact unit count of jurisdictions. Through 2019, Orange’s housing grew by about 1 percent. The County of Orange grew 5.5 percent between 2010 and 2019; 4 percent more than the City of Orange. The housing stock growth for Orange from 2010 to 2019 is comparable to surrounding cities, except for Yorba Linda and Garden Grove, where most experienced an increase of about 1 percent. Yorba Linda experienced the largest housing unit increase at 8.1 percent and Orange experienced the lowest growth.

Jurisdiction	2010	2015	2019	Percent Change 2010 to 2015	Percent Change 2015 to 2019
Anaheim	105,050	104,812	106,708	-0.23%	1.81%
Fullerton	47,956	47,319	48,120	-1.33%	1.69%
Yorba Linda	21,665	22,592	23,452	4.28%	3.81%
<b>Orange</b>	<b>44,217</b>	<b>44,229</b>	<b>44,664</b>	<b>0.03%</b>	<b>0.98%</b>
Santa Ana	77,796	77,192	79,024	-0.78%	2.37%
Garden Grove	47,454	48,385	49,061	1.96%	1.40%
County of Orange	1,042,254	1,064,642	1,100,449	2.15%	3.36%

*Source: American Community Survey, 5-Year Estimate, 2010, 2015, 2019.*

### 2. Housing Type

**Table 2-26** provides of the Orange housing stock by type in comparison to the County of Orange. Per the 2019 ACS, single-family detached housing units are the most common type of housing in both the City of Orange and the County (54.9 percent and 50.6 percent, respectively). Multi-family housing units made up 33.1 percent of units in the City and just over 34 percent in the County. Additionally, mobile homes made up under three percent of housing units in both the City and the County.

Jurisdiction	Single- Family Detached	Single-Family Attached	Multi-Family	Mobile Homes	Total Units <sup>1</sup>
<b>Orange</b>	54.9%	9.6%	33.1%	2.4%	44,664
County of Orange	50.6%	12.3%	34.3%	2.7%	1,100,449

*Source: American Community Survey, 5-Year Estimates, 2019.*  
<sup>1</sup>*Note: The data shows the percent of total units in structure.*



### 3. Housing Availability and Tenure

Housing tenure and vacancy rates generally influence the supply and cost of housing. Housing tenure defines if a unit is owner-occupied or renter occupied. The tenure characteristics in a community can indicate affordability, household stability, and availability of unit types. Tenure distribution may correlate with household income, composition, and age of the householder.

In 2019, Orange’s occupied housing included a higher percentage of renter occupied units at 55.8 percent. The majority of owners resided in single-family detached units, whereas the majority of renters resided in multi-family units. Just 6.9 percent of multi-family homes were occupied by owners and about 21 percent single family units were occupied by renters. Mobile homes were more likely to be occupied by owners (2.9 percent) whereas 2 percent were occupied by renters.

Tenure	Single-Family Detached	Single-Family Attached	Multi-Family	Mobile Homes	Total Occupied Units <sup>1</sup>
Owner Occupied	80.1%	10.0%	6.9%	2.9%	24,939
Renter Occupied	21.1%	9.1%	67.9%	2.0%	18,136
<b>Total</b>	<b>54.9%</b>	<b>9.6%</b>	<b>33.1%</b>	<b>2.4%</b>	<b>44,664</b>

*Source: American Community Survey, 5-Year Estimates, 2019.*  
<sup>1</sup>*Note: The data shows the percent of total occupied units.*

As shown in **Table 2-28**, owner-occupied households and renter-occupied households were about the same average size, a common trend in nearby cities. Owner-occupied households in Orange had a slightly smaller household size than renters (3 and 3.2, respectively). Overall, in the County of Orange, owner households were smaller than renter households. Of the nearby cities, the average household sizes stayed below 3.6 persons, with the exception of Santa Ana where the average household size was 4.3 persons.

Jurisdiction	Owner Occupied Household Size	Renter Occupied Household Size	Average Household Size
Anaheim	3.38	3.41	3.39
Fullerton	2.93	3.02	2.97
Yorba Linda	3.02	2.78	2.98
<b>Orange</b>	<b>3</b>	<b>3.18</b>	<b>3.08</b>
Santa Ana	4.25	4.32	4.28
Garden Grove	3.57	3.6	3.58
County of Orange	2.98	3.05	3.01

*Source: American Community Survey, 5-Year Estimates, 2019.*

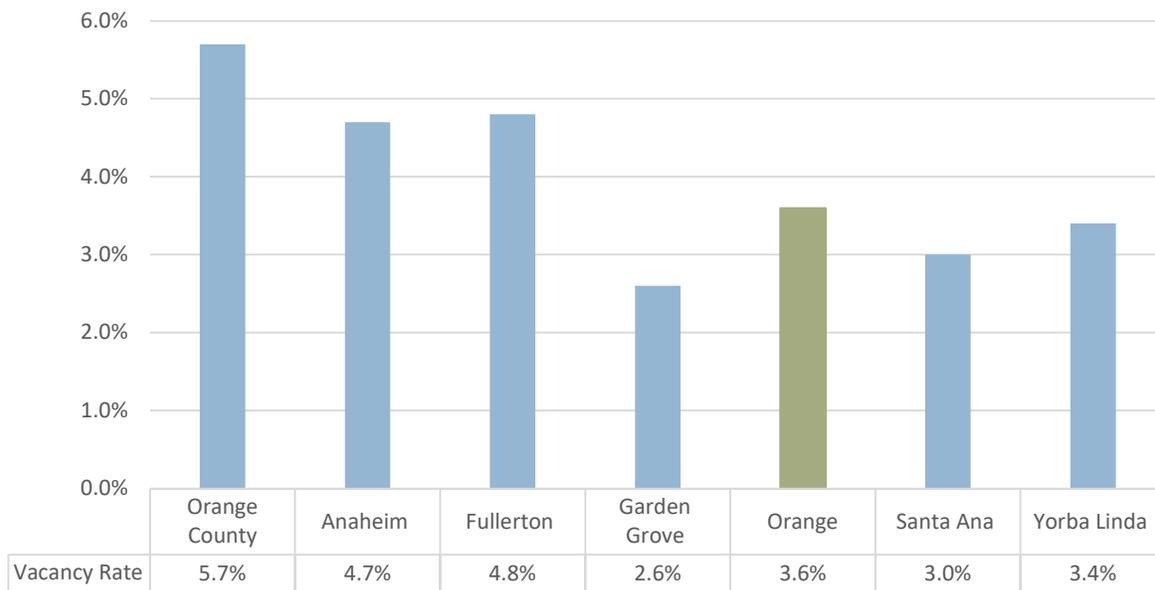
Vacancy rates indicate the degree of available choice. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent. Low vacancy rates usually indicate high demand and/or low supply conditions in the



housing market. Too low of a vacancy rate can force prices up and make it more difficult for lower and moderate-income households to find housing. Vacancy rates of between two to three percent are usually considered healthy for single-family or ownership housing, and rates of five to six percent are usually considered healthy for multi-family or rental housing.

The data displayed in **Figure 2-8** shows that Orange has a vacancy rate of 3.6 percent, a generally healthy rate and comparable to many surrounding communities. Orange’s vacancy rate is lower than the County’s rate by 2.1 percent.

**Figure 2-8: Vacant Rate by Jurisdiction**



Source: American Community Survey, 5-Year Estimates, 2019.

**Table 2-30** below displays a breakdown of vacancy types for units in Orange. Units currently available for rent have the highest vacancy count at 673 units. In 2019 there were 117 rented but unoccupied units and 94 sold but unoccupied units. There were zero units available for migrant workers and 226 units available for sale in 2019.

<b>Table 2-30: Vacant Housing Units by Type</b>		
<b>Type of Housing</b>	<b>Estimate</b>	<b>Percent</b>
For rent	673	42.4%
Rented, not occupied	117	7.4%
For sale only	226	14.2%
Sold, not occupied	94	5.9%
For seasonal, recreational or occasional use	77	4.8%
For migrant workers	0	0.0%
Other vacant	402	25.3%
<b>Total</b>	<b>1,589</b>	<b>100%</b>

Source: American Community Survey, 5-Year Estimates, 2019.

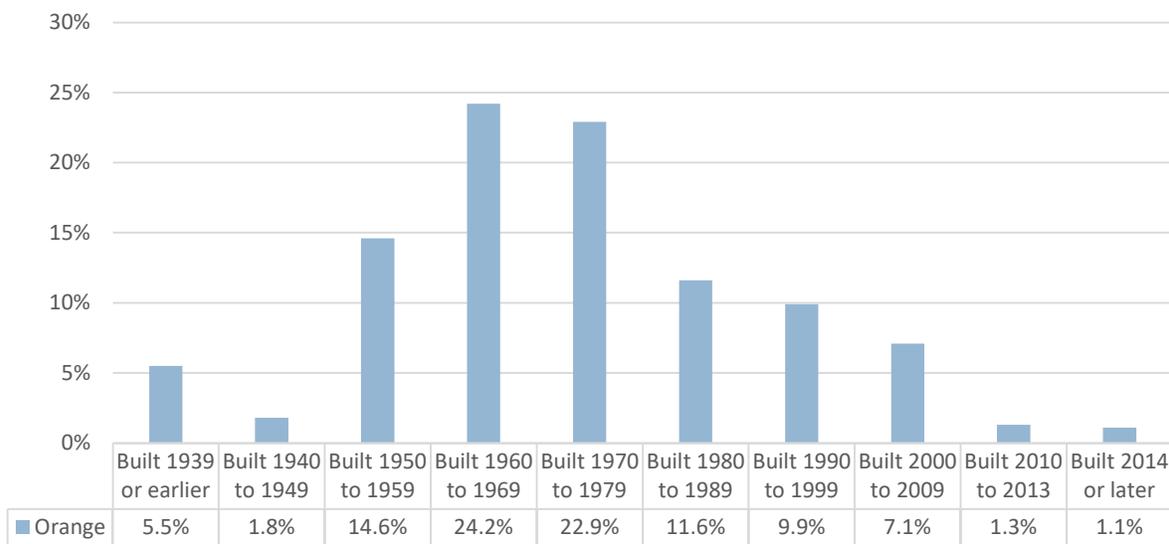


#### 4. Housing Age and Condition

Housing age can be an indicator of housing condition within a community. For example, housing that is over 30 years old is typically in need of some major rehabilitation, such as a new roof, foundation, plumbing, etc. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs.

According to the data displayed in **Figure 2-9**, there was a housing stock boom from 1960 to 1979 that resulted in the creation of 47 percent of Orange’s housing units. Between 1950 and 1959, a smaller number of homes were built (14.6 percent) and another 11.6 percent from 1980 to 1989. Overall, a large percentage of homes were built during the mid to late 20<sup>th</sup> century. Only about 9.5 percent units in Orange were built after 2000 and one percent in 2014 or later. A large proportion of older housing could indicate that most of the City’s housing stock could require major rehabilitation. This proportion may also be a reflection of the large number of units which are located in the City’s four historic districts. These units were built prior to 1940 and up until the 1960s. Historic structures are protected and maintained and would not fall into the category of older units needing rehabilitation.

**Figure 2-9: Housing Stock Age**



Source: American Community Survey, 5-Year Estimates, 2019.

#### 5. Housing Costs and Affordability

Housing costs reflect the supply and demand of housing in a community. This section summarizes the cost and affordability of the housing stock to the City of Orange’s residents.

**Table 2-31** show the median home value in Orange was \$665,000 in 2019. Homes in Orange were comparable to the median cost of a home in the County and were less expensive than homes in Yorba Linda (\$878,800) or the County as a whole (\$694,200). Homes in the City of Orange were valued slightly higher than homes in Santa, Anaheim and Garden Grove.



**Table 2-31: Median Home Value by Community**

Jurisdiction	Median Home Value
Anaheim	\$583,700
Fullerton	\$660,300
Yorba Linda	\$878,800
<b>Orange</b>	<b>\$665,000</b>
Santa Ana	\$501,400
Garden Grove	\$561,600
County of Orange	\$694,200

*Source: American Community Survey, 5-Year Estimates, 2019.*

Table 2-32 shows that between 2017 and 2020 rent for a one-bedroom unit in Orange increased by 4.8 percent from \$1,819 to \$1,906. Two-bedroom rentals saw the highest percent change from 2017 to 2020 at five percent and 3-bedroom units experienced a 3.5 percent increase in cost. There is no data available for 4-bedroom rentals in 2020, but from 2017 to 2019 the cost of rent increased by 2.9 percent.

**Table 2-32: Average Monthly Rental Rates, 2017-2020**

Unit Type	January 2017 Average Monthly Rent	January 2018 Average Rent/Sq. Foot	January 2019 Average Monthly Rent	January 2020 Average Monthly Rent	Percent Change from 2017 to 2020
1 Bedroom	\$1,819	\$1,919	\$1,941	\$1,906	4.8%
2 bedrooms	\$2,237	\$2,279	\$2,321	\$2,349	5.0%
3 Bedrooms	\$2,722	\$2,738	\$2,767	\$2,816	3.5%
4+ Bedrooms	\$2,943	\$2,989	\$3,000	--	2.9%*

*Source: Zillow, Orange Rentals Zillow Rent Index, accessed May 2020.*  
 \*Percent Change from 2019 to 2019, 2020 rental data not available.

Housing affordability can be inferred by comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing, as well as indicate the type of households most likely to experience overcrowding and overpayment.

HUD conducts annual household income surveys nationwide to determine a household’s eligibility for federal housing assistance. Based on this survey, HCD developed income limits using on the AMI to determine the maximum affordable price by households in the upper range of their respective income category. Households in the lower end of each category can afford less by comparison than those at the upper end. The maximum affordable home and rental prices for residents in Orange County are shown in **Table 2-33** and **Table 2-34**.

The data shows the maximum amount that a household can pay for housing each month without incurring a cost burden (overpayment). This amount can be compared to current housing asking prices (**Table 2-31**) and market rental rates (**Table 2-32**) to determine what types of housing opportunities a household can afford.



### **Extremely Low-income Households**

Extremely low-income households earn less than 30 percent of the County AMI – up to \$26,950 for a one-person household and up to \$41,550 for a five-person household in 2020. Extremely low-income households cannot afford market-rate rental or ownership housing in Orange without assuming a substantial cost burden.

### **Very Low-income Households**

Very low-income households earn between 31 percent and 50 percent of the County AMI – up to \$44,580 for a one-person household and up to \$69,200 for a five-person household in 2020. A very low-income household can generally afford homes priced between \$183,000 and \$259,000, adjusting for household size. A very low-income household at the maximum income limit can afford to pay approximately \$1,121 to \$1,730 in monthly rent, depending on household size. Given the high cost of housing in Orange, persons or households of very low-income could not afford to rent or purchase a home in the City.

### **Low-income Households**

Low-income households earn between 51 percent and 80 percent of the County's AMI - up to \$71,750 for a one-person household and up to \$110,650 for a five-person household in 2020. The affordable home price for a low-income household at the maximum income limit ranges from \$308,500 to \$452,000. Ownership housing would not be affordable to low-income households. A one-person low-income household could afford to pay up to \$1,794 in rent per month and a five-person low-income household could afford to pay as much as \$2,766. Low-income households in Orange would not be able to find adequately sized affordable apartment units (Table 32).

### **Moderate income Households**

Persons and households of moderate income earn between 81 percent and 120 percent of the County's AMI – up to \$133,500, depending on household size in 2020. The maximum affordable home price for a moderate-income household is \$377,000 for a one-person household and \$558,600 for a five-person family. Moderate income households in Orange would not be able to purchase a home in the City. The maximum affordable rent payment for moderate income households is between \$2,163 and \$3,338 per month. Appropriately sized market-rate rental housing is generally affordable to households in this income group.



Table 2-33: Affordable Monthly Housing Cost for Renters in Orange County, 2020				
Annual Income	Rent	Utilities	Total Affordable Monthly Housing Cost	
<b>Extremely Low-Income (30% of AMI)</b>				
1-Person	\$26,950	\$556	\$118.00	\$674
2-Person	\$30,800	\$619	\$151.00	\$770
3-Person	\$34,650	\$669	\$197.00	\$866
4-Person	\$38,450	\$718	\$243.00	\$961
5-Person	\$41,550	\$750	\$289.00	\$1,039
<b>Very Low-Income (50% of AMI)</b>				
1-Person	\$44,850	\$1,003	\$118.00	\$1,121
2-Person	\$51,250	\$1,130	\$151.00	\$1,281
3-Person	\$57,650	\$1,244	\$197.00	\$1,441
4-Person	\$64,050	\$1,358	\$243.00	\$1,601
5-Person	\$69,200	\$1,441	\$289.00	\$1,730
<b>Low-Income (80% AMI)</b>				
1-Person	\$71,750	\$1,676	\$118.00	\$1,794
2-Person	\$82,000	\$1,899	\$151.00	\$2,050
3-Person	\$92,250	\$2,109	\$197.00	\$2,306
4-Person	\$102,450	\$2,318	\$243.00	\$2,561
5-Person	\$110,650	\$2,477	\$289.00	\$2,766
<b>Moderate-Income (120% AMI)</b>				
1-Person	\$86,500	\$2,045	\$118.00	\$2,163
2-Person	\$98,900	\$2,322	\$151.00	\$2,473
3-Person	\$111,250	\$2,584	\$197.00	\$2,781
4-Person	\$123,600	\$2,847	\$243.00	\$3,090
5-Person	\$133,500	\$3,049	\$289.00	\$3,338
<p>Source: Orange County Housing Authority, 2020 Utility Allowance Schedule and California Department of Housing and Community Development, 2020 Income Limits and Kimley Horn and Associates Assumptions: 2020 HCD income limits; 30% gross household income as affordable housing cost; 15% of monthly affordable cost for taxes and insurance; 10% down payment; and 4.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Orange County Utility Allowance.</p> <p>1. Utilities includes basic electric, water, sewer/trash, refrigerator, and stove.</p>				



**Table 2-34: Affordable Monthly Housing Cost for Homeowners in Orange County, 2020**

Annual Income	Mortgage	Utilities	Tax and Insurance	Total Affordable Monthly Housing Cost	Affordable Purchase Price	
<b>Extremely Low-Income (30% of AMI)</b>						
1-Person	\$26,950	\$455	\$118	\$101	\$674	\$99,990
2-Person	\$30,800	\$504	\$151	\$116	\$770	\$110,500
3-Person	\$34,650	\$539	\$197	\$130	\$866	\$118,000
4-Person	\$38,450	\$574	\$243	\$144	\$961	\$125,800
5-Person	\$41,550	\$594	\$289	\$156	\$1,039	\$130,200
<b>Very Low-Income (50% of AMI)</b>						
1-Person	\$44,850	\$835	\$118	\$168	\$1,121	\$183,000
2-Person	\$51,250	\$938	\$151	\$192	\$1,281	\$205,500
3-Person	\$57,650	\$1,028	\$197	\$216	\$1,441	\$225,400
4-Person	\$64,050	\$1,118	\$243	\$240	\$1,601	\$245,000
5-Person	\$69,200	\$1,182	\$289	\$260	\$1,730	\$259,000
<b>Low-Income (80% AMI)</b>						
1-Person	\$71,750	\$1,407	\$118	\$269	\$1,794	\$308,500
2-Person	\$82,000	\$1,592	\$151	\$308	\$2,050	\$349,100
3-Person	\$92,250	\$1,763	\$197	\$346	\$2,306	\$386,500
4-Person	\$102,450	\$1,934	\$243	\$384	\$2,561	\$424,000
5-Person	\$110,650	\$2,062	\$289	\$415	\$2,766	\$452,000
<b>Moderate-Income (120% AMI)</b>						
1-Person	\$86,500	\$1,720	\$118	\$324	\$2,163	\$377,000
2-Person	\$98,900	\$1,951	\$151	\$371	\$2,473	\$427,800
3-Person	\$111,250	\$2,167	\$197	\$417	\$2,781	\$475,000
4-Person	\$123,600	\$2,384	\$243	\$464	\$3,090	\$522,700
5-Person	\$133,500	\$2,548	\$289	\$501	\$3,338	\$558,600
<p>Source: Orange County Housing Authority, 2020 Utility Allowance Schedule and California Department of Housing and Community Development, 2020 Income Limits and Kimley Horn and Associates Assumptions: 2020 HCD income limits; 30% gross household income as affordable housing cost; 15% of monthly affordable cost for taxes and insurance; 10% down payment; and 4.5% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Orange County Utility Allowance.</p> <p>1. Utilities includes basic electric, water, sewer/trash, refrigerator, and stove.</p>						

# Section 3: Housing Constraints, Resources, and Fair Housing





# Housing Constraints

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As common in many communities, a variety of constraints affect the provisions and opportunities for adequate housing in the City of Orange. Housing constraints consist of both governmental constraints, including but not limited to development standards and building codes, land use controls, and permitting processes; as well as, nongovernmental or market constraints, including but not limited to land costs, construction costs, and availability of finances. Combined, these factors create barriers to availability and affordability of new housing, especially for lower and moderate-income households.

## A. Nongovernmental Constraints

Nongovernmental constraints largely affect the cost of housing in the City of Orange and can produce barriers to housing production and affordability. These constraints include the availability and cost of land for residential development, the demand for housing, financing and lending, construction costs, and the availability of labor, which can make it expensive for developers to build any housing, and especially affordable housing. The following highlights the primary market factors that affect the production of housing in Orange.

### 1. Land Costs and Construction Costs

Construction costs vary widely according to the type of development, with multi-family housing generally less expensive to construct than single-family homes. However, there is wide variation within each construction type, depending on the size of the unit and the number and quality of amenities provided. An indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The ICC provides estimates for the average cost of labor and materials for typical Type VA wood-frame housing. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes. In February 2020, the ICC estimated that the average per square-foot cost for good-quality housing was approximately \$117.40 for multi-family housing and \$130.04 for single-family homes. Construction costs for custom homes and units with extra amenities, run even higher. Although construction costs are a significant portion of the overall development cost, they are consistent throughout the region and, especially when considering land costs, are not considered a major constraint to housing production in Orange.

Land costs can also pose a significant constraint to the development of affordable and middle-income housing and represents a significant cost component in residential development. Land costs may vary depending on whether the site is vacant or has an existing use that must be removed. Similarly, site constraints such as environmental issues (e.g., steep slopes, soil stability, seismic hazards, flooding) can also be factored into the cost of land. A quick May 2020 web search for lots for sale in the City of Orange returned three lots for sale ranging in size from 0.65 acres at \$620,000 to 1.14 acres at \$790,000. Based current prices of for sale lots, the vacant lots cost an estimated average price per square foot of \$21 or an estimated cost of \$700,000 for about one acre.



## 2. Availability of Financing

The availability of financing in a community depends on a number of factors, including the type of lending institutions active in a community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to such loans. Additionally, availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The primary concern in a review of lending activity is to determine whether home financing is available to residents of a community. The data presented in this section include the disposition of loan applications submitted to financial institutions for home purchase, home improvement, and refinancing in Orange.

**Table 3-1** below displays the disposition of loan applications for the County of Orange, per the 2019 Home Mortgage Disclosure Act report from the Consumer Finance Protection Bureau. According to the data, applicants in the 120 percent median income or more had the highest rates of loans approved. Of that category, applicants who reported White had the highest percentage of approval and the number of applications. Applicants in the less than 50 percent of the MSA/MD median income categories were showed higher percentages of denied loans than loans originated. According to the data, applicants who reported white were, on average, more likely to be approved for a loan than another race or ethnicity. The Given the relatively high rates of approval for home purchase, improvement, and refinance loans, home financing is generally available and not considered to be a significant constraint to the provision and maintenance of housing in Orange.



**Table 3-1: Disposition of Loan Applications by Race/Ethnicity– Anaheim-Santa Ana-Irvine MSA/MD**

Applications by Race/Ethnicity	Percent Approved	Percent Denied	Percent Other	Total (Count)
<b>LESS THAN 50% OF MSA/MD MEDIAN</b>				
American Indian and Alaska Native	26.2%	52.3%	23.1%	65
Asian	33.9%	42.5%	26.7%	1,382
Black or African American	41.6%	33.7%	25.8%	89
Native Hawaiian or other Pacific Islander	25.0%	44.2%	30.8%	52
White	45.6%	31.2%	26.1%	5,240
Hispanic or Latino	37.9%	38.2%	26.8%	1,566
<b>50-79% OF MSA/MD MEDIAN</b>				
American Indian and Alaska Native	38.1%	34.0%	29.9%	97
Asian	53.3%	25.3%	29.4%	3,153
Black or African American	43.4%	19.1%	41.4%	152
Native Hawaiian or other Pacific Islander	49.4%	39.8%	16.9%	83
White	54.5%	23.3%	27.6%	8,677
Hispanic or Latino	47.6%	27.7%	29.3%	3,245
<b>80-99% OF MSA/MD MEDIAN</b>				
American Indian and Alaska Native	51.4%	25.7%	31.4%	35
Asian	59.5%	19.2%	29.3%	1,495
Black or African American	52.9%	22.1%	30.9%	68
Native Hawaiian or other Pacific Islander	43.5%	13.0%	43.5%	23
White	61.9%	17.2%	26.1%	3,873
Hispanic or Latino	54.0%	21.4%	29.1%	1,347
<b>100-119% OF MSA/MD MEDIAN</b>				
American Indian and Alaska Native	48.9%	22.7%	29.5%	88
Asian	62.3%	15.6%	28.8%	4,820
Black or African American	55.6%	20.1%	28.6%	234
Native Hawaiian or other Pacific Islander	49.4%	27.6%	31.0%	87
White	66.2%	13.8%	25.1%	12,607
Hispanic or Latino	60.8%	16.4%	26.8%	3,398
<b>120% OR MORE OF MSA/MD MEDIAN</b>				
American Indian and Alaska Native	59.2%	13.0%	32.0%	169
Asian	62.8%	12.9%	29.0%	17,800
Black or African American	57.7%	17.3%	27.2%	624
Native Hawaiian or other Pacific Islander	64.2%	11.4%	26.8%	254
White	68.3%	11.3%	24.9%	49,811
Hispanic or Latino	64.6%	13.3%	26.7%	6,095

*Source: Consumer Financial Protection Bureau, Disposition of loan applications, by Ethnicity/Race of applicant, 2019.*



### 3. Economic Constraints

Market forces on the economy and the trickle-down effects on the construction industry can act as a barrier to housing construction and especially to affordable housing construction. It is estimated that housing price growth will continue in the city and the region for the foreseeable future.

A 2020 California Association of Realtors (CAR) report found that:

- Single-family homes on the market in Orange County experienced a nine percent year to year increase and cost an average of \$880,000 in February 2020
- This was almost \$300,000 higher than the State median home price in the same month (\$579,770).

According to the CAR First Time Buyer Housing Affordability Index:

- From 2018 to 2019 the median value of a single-family home in Orange County was \$703,800
- This estimates monthly payments (including taxes and insurance) of about \$3,630,
- Which requiring an average qualifying income of \$108,900.

Additionally, single-family homes and cost of living in Orange was reported slightly higher than the State median housing and living costs. According to April 2020 data from Zillow:

- The median cost of a single-family home on the market in Orange is \$731,260.
- Home values in the City have gone up 3.5 percent over the past year (2019-2020) and Zillow predicts they will fall -1.2 percent within the next year.
- The same report found that in January of 2020 the median list price per square foot in Orange is \$395, which is lower than the County of Orange average of \$441.

Orange's single-family home value index (\$757,000) has been on a steady rise since early 2019, however, according to March 2020 data, they are expected to dip slightly (estimated \$752,000) in 2021. The cost of land and home prices in Orange are considered a potential constraint to the development of and access to housing, particularly the development of and access to affordable housing.

### B. Governmental Constraints

In addition to market constraints, local policies and regulations also affect the price and availability of housing and the provision of affordable housing. For example, State and Federal regulations affect the availability of land for housing and the cost of housing production, making it difficult to meet the demand for affordable housing and limiting supply in a region. Regulations related to environmental protection, building codes, and other topics have significant, often adverse, impacts on housing cost and availability.

While the City of Orange has no control over State and Federal Laws that affect housing, local laws including land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing and create barriers to housing.



## 1. Land Use Controls

In the State of California, cities are required to prepare a comprehensive, long term General Plan to guide future development. The Land Use Element of the General Plan establishes land uses and density of development within the City of Orange. The Land Use Element sets forth policies and regulations for guiding local development. These policies, together with existing zoning regulations, establish the amount and distribution of land to be allocated for different uses within the City. The Land Use Element of the General Plan identifies the following residential categories and their existing allowed densities:

- **Estate Low Density Residential (ESTR)** – 0 - 2.0 dwelling units per acre
- **Low Density Residential (LDR)** – 2.1 - 6.0 dwelling units per acre
- **Low Medium Density Residential (LMDR)** – 6.1 - 15.0 dwelling units per acre
- **Medium Density Residential (MDR)** 15.1 - 24.0 dwelling units per acre

In addition to residential categories, Orange also allows residential uses in mixed use zones and senior housing in commercial and public institution zones with a conditional use permit (CUP). the General Plan provides three designations for mixed-use activity centers. All of these designations promote creative mixes of commercial retail, office, housing, civic, and entertainment uses that vary in composition and intensity based upon location, accessibility, and the surrounding development context. Mixed Use designations that allow residential uses include the following:

- **Neighborhood Mixed-use (NMX)** – Max. 24 dwelling units per acre
- **Old Towne Mixed-Use (OTMX) 15** – Max. 15 dwelling units per acre
- **Old Towne Mixed Use (OTMX) 24** – Max. 24 dwelling units per acre
- **Old Towne Mixed Use Spoke** – 6.0 - 15.0 dwelling units per acre
- **Urban Mixed Use (UMX)** – 30.0 - 60.0 dwelling units per acre

Senior housing is permitted in the C2 and C3 commercial zone districts. Residential uses within these districts do not have a maximum dwelling units per acre. The total number of units is determined by the maximum FAR, height, and story requirements.

These categories accommodate development of a wide range of housing types in Orange. Furthermore, maintaining the existing residential categories is important for ensuring compatibility between new and existing housing. The City's Land use controls, development standards and regulations are available for review by the public online in the City of Orange Municipal and Development code.

### Historic Districts

The City Council has determined that the spirit, character and history of the City, State, and Nation are reflected in the historic structures, improvements, natural features, sites, and areas of significance located within the City, and that in the face of ever-increasing pressures of modernization, cultural historic resources and historic districts located within the City are threatened with alteration, removal or demolition. The City believes these structures and districts represent the City's unique historical, social and cultural foundations, and historic districts aim to preserve the structures as living parts of community



life and development in order to build a greater understanding of the City's past and to give future generations the opportunity to appreciate, understand and enjoy the City's rich heritage.

Currently, four districts have been established that cover historic residences. These are the Old Towne District, Fairhills Eichler Tract, Fairhaven Eichler Tract, and Fairmeadow Eichler Tract. New districts may be established provided an application, which complies with the zoning amendment procedure for a change in zoning district, is submitted and the district meets criteria established in Title 17 Chapter 17.15.050 of the City's Municipal Code. Any district designated historic includes additional regulations and uses over base zoning of an area to encourage historic preservation and complementary new development. To promote orderly development and preservation within historic districts the following standards and their amendments shall apply: the Historic Preservation Design Standards, the Santa Fe Depot Specific Plan, the Orange Eichler Design Standards, the General Plan's Historic Preservation Element, and the Secretary of the Interior's Standards for the Treatment of Historic Properties.

**Flood Plain Overlay**

The Flood Plain overlay districts (FP-1 and FP-2) are intended to be applied to those areas of the City which, under present conditions, are subject to periodic flooding and the hazards associated with flooding. The objectives of the flood plain districts shall be:

- To prevent loss of life and property and to minimize economic loss caused by flood flows;
- To establish criteria for land management and use in flood prone areas consistent with criteria promulgated by the Federal Insurance Administration for the purpose of providing flood insurance eligibility for property owners
- To prohibit encroachments, new construction, or other improvements or development that would obstruct the flow of floodwaters within a regulatory floodway; and
- To regulate and control uses below the elevation of the design flood flow with the remainder of the flood plain.

**Single Story Overlay Zone**

The Single Story (A) overlay is established to maintain the character of existing single-story residential neighborhoods by limiting building height to one story. The height of all buildings within the Single Story Overlay District shall be limited to one story or 20 feet, whichever is less. All other development standards applicable to the underlying district and not in conflict with this section will apply. The following residential districts are subject to the Single-Story Overlay, R1-6 (A), R-2-6 (A), and R-3(A). The Single Story Overlay is established in limited locations and is not a widespread requirement, it is therefore not considered a constraint to the development of housing in Orange.

**Parking Overlay**

The Parking (P) Overlay District is established to allow residentially zoned properties to be used to provide off-street parking facilities for adjacent land uses. The Parking overlay is applied only to residential properties and only when it can be demonstrated that the use of the residential lot for parking purposes will not adversely affect the surrounding residential neighborhood. The Parking Overlay may be a



constraint to the development of housing, as it permits the use of nonresidential projects (parking) on residentially zoned properties. The Parking Overlay applies to one residential block in the City of Orange and is therefore not considered a constraint or barrier to the development of housing.

## 2. State Density Bonus Law

Density bonuses are another way to increase the number of dwelling units otherwise allowed in a residentially zoned area. The City's Zoning Ordinance identifies the purpose of the Density Bonus Ordinance is to grant a density bonus and regulatory concessions and incentives to a developer of a housing development, child care facilities, or for the donation of land for housing, where the developer agrees to construct a specified percentage of housing for lower income households, very low-income households, moderate income households or qualifying residents. Title 17 Chapter 15 of the City's municipal code outlines all regulatory requirements and standards for projects eligible for Density Bonus. Density bonuses are available to five categories of housing developments, all are detailed below.

Effective January 1, 2021, California State Assembly Bill 2345 amends the Density Bonus Law to expand and enhance development incentives for projects with affordable and senior housing components. AB 2345 amends the Density Bonus Law to increase the maximum density bonus from 35 percent to 50 percent. To be eligible for the maximum bonus, a project must set aside at least (i) 15 percent of total units for very low income households, (ii) 24 percent of total units for low income households, or (iii) 44 percent of for-sale units for moderate income households. Levels of bonus density between 35 percent and 50 percent are granted on a sliding scale. The City's currently adopted Density Bonus Ordinance is no longer consistent with State law and must be amended to comply with new statutory requirement. Section 4: Housing Plan outlines the City's plan to maintain compliance with State legislation.

### Affordable Housing

The City's Municipal Code follows State density bonus standards, processes and requirements for proposed affordable housing projects or units. All housing developments consisting of five or more dwelling units (excluding any units permitted by the density bonus awarded pursuant to Chapter 15 of the Zoning Ordinance) are eligible for one density bonus (calculations detailed in Table 3-2) and concessions and incentives.

These required percentages of affordable units apply only to the housing development without any density bonus units, not the entire housing development. For example, assume that a one hundred (100) unit housing development is entitled to a twenty (20) percent density bonus, giving a total of one hundred twenty (120) units. To qualify for the twenty (20) percent density bonus, the housing development need only provide five units affordable to very low-income households (five percent of one hundred (100)) or ten units affordable to lower income households (ten percent of one hundred (100)).

### Senior Citizen Housing Development or Mobile home Park

The City's Municipal Code follows State density bonus standards, processes and requirements for Senior Housing developments. A senior citizen housing development or a mobile home park are eligible for



a density bonus, as calculated in Table 3-2 below, even if none of the units are affordable. The density bonus for a senior citizen housing development or a mobile home park is permitted in geographic areas of the housing development other than the areas where the qualifying resident or mobile home units are located.

### *Donations of Land*

The City's Municipal Code follows density bonus standards, processes and requirements for donations of land. An applicant for a tentative tract map, parcel map, or other residential development approval, who donates land to the City in accordance with this subsection, shall be entitled to a density bonus for the entire housing development, as calculated in **Table 3-2** below, provided the parcel is large enough to accommodate at least ten percent of the market rate units at densities suitable for housing affordable to very low-income households.

In other words, a five hundred (500) unit market rate housing development is eligible to receive a density bonus by donating land zoned at densities that can accommodate, and are suitable for, fifty (50) units of housing affordable to very low-income households.

### *Eligibility for Increase Density Bonus*

An applicant shall be eligible for the increased density bonus described in this subsection if all of the following conditions are met:

- The applicant donates and transfers the land no later than the date of approval of the final subdivision map, parcel map or residential development application.
- The land being transferred has all permits and approvals, other than building permits necessary for the development of housing units affordable to very low-income households.
- The developable acreage and zoning classification of the land being transferred are sufficient to permit construction of units affordable to very low-income households in an amount not less than ten percent of the number of residential units of the proposed housing development.
- The transferred land is at least one acre in size or of sufficient size to permit development of at least forty (40) units, has the appropriate General Plan designation, is appropriately zoned for development as affordable housing, and is or will be served by adequate public facilities and infrastructure. The land shall have appropriate zoning and development standards to make the development of the units affordable to very low-income households feasible. No later than the date of approval of the final tract map, parcel map, or of the residential development, the transferred land shall have all of the permits and approvals, other than building permits, necessary for the development of the units affordable to very low income households on the transferred land, except that the City may subject the proposed housing development to subsequent design review to the extent authorized by subdivision "(i)" of Section 65583.2 of the California Government Code if the design is not reviewed by the City prior to the time of transfer.
- The land is transferred to the City or to a housing developer approved by the City. The City may require the applicant to identify and transfer the land to the developer.



- The transferred land shall be within the boundary of the proposed housing development or, if the City agrees, within one-quarter mile of the boundary of the proposed housing development.
- The transferred land and the affordable units shall be subject to a Density Bonus Housing Agreement ensuring continued affordability of the affordable units, which Density Bonus Housing Agreement (or a memorandum thereof) shall be recorded in the Official Records of the County of Orange prior to final map approval or, where a map is not being processed, prior to the issuance of building permits for such affordable units.

### Condominium Conversions

The City's Municipal Code follows State density bonus standards, processes and requirements for condo conversions. A condominium conversion is eligible for either:

- A density bonus of twenty-five (25) percent over the number of apartments to be provided within the existing structure or structures proposed for conversion (meaning that additional units must be added on the site either by subdividing existing units or adding units on the site), or
- Other incentives of equivalent financial value

The City may place such reasonable conditions on the granting of a density bonus or other incentives of equivalent financial value as it finds appropriate, including, but not limited to, conditions which assure continued affordability of units to subsequent purchases who are lower income households or moderate-income households.

### Calculations for Density Bonus

For the purpose of calculating the amount of the density bonus, an applicant requesting a density bonus shall elect whether the density bonus shall be awarded on the basis of the particular affordability category. The amount of the density bonus is calculated as show in **Table 3-2** below. The amount of the density bonus to which the applicant is entitled shall vary according to the amount by which the percentage of affordable units exceeds the percentage.

Additionally, all density calculations resulting in fractions shall be rounded up to the next whole number. For example, a housing development with 102 units, ten percent of which are affordable to lower income households, is entitled to 21 bonus units. The number of affordable units must also be rounded up. In a 102-unit housing development, an applicant would need to provide eleven units to meet the ten percent requirement. If they so choose, the applicant may elect to accept a lesser percentage of density bonus.



**Table 3-2: Density Bonus Calculations<sup>1</sup>**

Affordable Units or Category	Minimum % Units in Category	Bonus Granted	Additional Bonus for each 1% increase in Affordable Units in category	% Units in category required for Maximum 35% Bonus
<b>Very Low Income</b>	5%	20%	2.5%	11%
<b>Lower Income</b>	10%	20%	1.5%	20%
<b>Moderate Income (ownership only)</b>	10%	5%	1%	40%
<b>Senior Citizen Housing Development or Mobile home Park (no affordable units required)</b>	Entire development	20%	No sliding scale provided	—
<b>Land Donation for Very-Low Income Housing</b>	0% of market rate units	15%	1%	30%
<b>Condominium Conversion – Moderate Income</b>	33%	25%	—	—
<b>Condominium Conversion – Lower Income</b>	15%	25%	—	—
<b>Child Care Facilities</b>	—	Sq. ft. in day care center	—	—

Notes:  
 (1) This table reflects the current Orange Municipal Code. The City of Orange defaults to State law regarding Density Bonus calculations and requirements.  
 Source: City of Orange, Municipal Code accessed May 4, 2020.

**Concessions and Incentives**

The City’s Municipal Code also permits the request of additional incentives and concessions; types of permitted requests are detailed below.

In addition to an increase in units, a development eligible for a density bonus is also eligible for three types of regulatory concessions as follow, (a) concessions and incentives, (b) waivers and reductions, and (c) reduced parking standards. An applicant for a density bonus may submit to the City a proposal for one to three concessions and incentives depending upon the percentage of affordable units provided.

**Waivers and Reductions**

In addition to requesting concessions and incentives, an applicant for a density bonus may submit to the City a proposal for the waiver or reduction of an unlimited number of development standards that would otherwise preclude or inhibit construction of a housing development with the density bonus and concessions and incentives to which the housing development is entitled and that are needed to make the housing development economically feasible. Waivers and reductions may also be requested by any applicant requesting a density bonus for a senior citizen housing development, a mobile home park, a condominium conversion or a childcare facility.



### Reduced Parking Standards

Upon the request of an applicant for a housing development that qualifies for a density bonus because it is a senior housing development or provides affordable units, the City must reduce the required parking for the entire housing development, including the market rate units, to the following:

- Zero to one bedroom, one on-site parking space
- Two to three bedrooms, two on-site parking spaces
- Four or more bedrooms, two and one-half on-site parking spaces

Additional and in detail standards, requirements, review processes and application information for projects which qualify for density bonus can be found in the City's Municipal Code.

## 3. Residential Development Standards

The City of Orange Zoning establishes sixteen residential districts to provide a range of housing types and lifestyles. The Zoning Ordinance also contains provisions to establish use regulations and development standards, which are intended to create the highest quality residential development, minimize land use conflicts, encourage the rehabilitation and maintenance of residential neighborhoods and implement the goals of the City's General Plan. The standards for the districts are shown in **Table 3-3** and are available on the City's website. The districts are as follows:

- **R1-5 (Single-Family Residential)** - A single-family residential district with a minimum lot area of five thousand (5,000) square feet. The R1-5 district is created to implement the East Orange General Plan where policies have been established to ensure functional and attractive single-family neighborhoods.
- **R1-6 Single-Family Residential)** - A single-family residential district with a minimum lot area of six thousand (6,000) square feet.
- **R1-7 (Single-Family Residential)** - A single-family residential district with a minimum lot area of seven thousand (7,000) square feet.
- **R1-8 (Single-Family Residential)** - A single-family residential district with a minimum lot area of eight thousand (8,000) square feet.
- **R1-10 (Single Family Residential)** - A single family residential district with a minimum lot area of ten thousand (10,000) square feet.
- **R1-12 (Single-Family Residential)** - A single-family residential district with a minimum lot area of twelve thousand (12,000) square feet.
- **R1-15 (Single-Family Residential)** - A single-family residential district with a minimum lot area of fifteen thousand (15,000) square feet.
- **R1-20 (Single-Family Residential)** - A single-family residential district with a minimum lot area of twenty thousand (20,000) square feet.
- **R1-40 (Single-Family Residential)** - A single-family residential district with a minimum lot area of one acre (forty-three thousand five hundred sixty (43,560) square feet).
- **R1-R (Single-Family Residential)** - A single-family rural residential district with a minimum lot area of two and one-half acres (one hundred eight thousand nine hundred (108,900) square feet). The purpose of this district is to allow for low density rural residential use in a manner which will



eliminate or minimize modifications to significant riparian habitat, oak woodlands and prominent landforms located within the areas encompassed by this land use designation.

- **R2-6 (Duplex Residential)** - A residential district that provides opportunities for duplex development on lots containing a minimum area of six thousand (6,000) square feet. This district recognizes the need to provide multiple-family housing in the form of duplexes, detached dwellings, or small apartment buildings.
- **R2-7 (Duplex Residential)** - A residential district that allows duplex housing on lots containing a minimum area of seven thousand (7,000) square feet.
- **R2-8 (Duplex Residential)** - A residential district that allows duplex housing on lots containing a minimum lot area of eight thousand (8,000) square feet.
- **R-3 (Multiple-Family Residential)** - A multiple-family residential district which allows apartments, condominiums, and townhomes. The purpose is to provide a minimum of ground area coverage and a maximum of open space within higher density developments.
- **R-4 (Multiple-Family Residential)** - A multiple-family residential district which allows apartments, condominiums, and townhomes.
- **MH (Mobile Home Residential)** - A mobile home district which allows for the preservation and construction of mobile home parks. The district recognizes the need to provide the unique setting and services of a mobile home park.

**Table 3-3** below displays the development standards for each of the above zones, which permit residential development. Title 17, Chapter 14 outlines the complete development standards for residential uses in the City of Orange.

<b>Table 3-3: Residential Development Standards in Orange - Dimensions</b>									
District	Dimensions			Min. Yard Setbacks (ft)			Construction Standards		
	Min. Lot Size (sf)	Min. Lot Frontage (ft)	Min. Lot Depth (ft)	Front	Side	Rear	Max. Height*	Max. FAR	Min. Usable Open Space (sf)
<b>R1-5</b>	5,000	50	90	Bld-15, Gar-20	v.2 <sup>1</sup>	(v.2)	32' – 2 stories	Based on bldg.	875
<b>R1-6</b>	6,000	60	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories <sup>1</sup>	(4)	900
<b>R1-7</b>	7,000	60	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	950
<b>R1-8</b>	8,000	60	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	1,000
<b>R1-10</b>	10,000	80	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	1,000
<b>R1-12</b>	12,000	80	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	1,000
<b>R1-15</b>	15,000	80	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	1,200



**Table 3-3: Residential Development Standards in Orange - Dimensions**

District	Dimensions			Min. Yard Setbacks (ft)			Construction Standards		
	Min. Lot Size (sf)	Min. Lot Frontage (ft)	Min. Lot Depth (ft)	Front	Side	Rear	Max. Height*	Max. FAR	Min. Usable Open Space (sf)
<b>R1-20</b>	20,000	100	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	(4)	1,500
<b>R1-40</b>	43,560	100	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	0.40 FAR	2,000
<b>R1-R</b>	108,900	100	100	20	5 <sup>1</sup>	20 <sup>1</sup>	32' – 2 stories	0.40 FAR	2,000
<b>R2-6</b>	6,000	60	N/R	15 <sup>2</sup>	5 <sup>1</sup>	10 <sup>1</sup>	32' – 2 stories <sup>1</sup>	0.70 FAR	350/unit
<b>R2-7</b>	7,000	60	N/R	15	5 <sup>1</sup>	10 <sup>1</sup>	32' – 2 stories	0.70 FAR	350/unit
<b>R2-8</b>	8,000	60	N/R	15	5 <sup>1</sup>	10 <sup>1</sup>	32' – 2 stories	0.70 FAR	350/unit
<b>R-3</b>	7,000 Interior, 8,000 Corner	70 Interior, 80 Corner	100	15 <sup>2</sup>	5 <sup>1</sup>	10	32' – 2 stories <sup>1</sup>	45%: 2-story 55%: 1-story	250/unit
<b>R-4</b>	6,000 Interior, 7,000 Corner	60 Interior, 70 Corner	N/R	10(z)	5 <sup>1</sup>	10	32' – 2 stories <sup>1</sup>	60%	150/unit
<b>MH</b>	N/R	N/R	N/R	(3)	(3)	75% of MH Space	200 sf space <sup>1</sup>	MH	(3)
<b>OTMU-155</b>	10,000	N/R	50	(6)	(6)	0 <sup>6</sup>	32' – 2 stories	0.6	N/R
<b>OTMU-15</b>	10,000	N/R	50	(6)	0 <sup>6</sup>	0 <sup>6</sup>	32' – 2 stories	0.5 -1.0	N/R
<b>OTMU-24</b>	10,000	N/R	50	(6)	0 <sup>6</sup>	0 <sup>6</sup>	32' – 2 stories	1.0 -1.5	N/R
<b>NMU-24</b>	40,000	N/R	100	10	0 <sup>6</sup>	0 <sup>6</sup>	45' – 3 stories	1.0-1.5	N/R
<b>UMU</b>	40,000	N/R	50	10	0 <sup>6</sup>	0 <sup>6</sup>	45' – 3 stories	1.5 - 3.0	N/R
<b>OP</b>	7,000	N/R	70	-- <sup>7</sup>	-- <sup>7</sup>	-- <sup>7</sup>	32' – 2 stories	0.5	N/R
<b>CP/C1</b>	40,000	100	N/R	-- <sup>7</sup>	-- <sup>7</sup>	-- <sup>7</sup>	32' – 2 stories	1.0	N/R
<b>CTR</b>	40,000	100	N/R	-- <sup>7</sup>	-- <sup>7</sup>	-- <sup>7</sup>	32' – 2 stories	1.0	-- <sup>7</sup>



**Table 3-3: Residential Development Standards in Orange - Dimensions**

District	Dimensions			Min. Yard Setbacks (ft)			Construction Standards		
	Min. Lot Size (sf)	Min. Lot Frontage (ft)	Min. Lot Depth (ft)	Front	Side	Rear	Max. Height*	Max. FAR	Min. Usable Open Space (sf)
<b>C2</b>	40,000	100	N/R	-- <sup>7</sup>	-- <sup>7</sup>	-- <sup>7</sup>	32' – 2 stories	1.0	-- <sup>7</sup>
<b>C3</b>	40,000	100	N/R	-- <sup>7</sup>	-- <sup>7</sup>	-- <sup>7</sup>	32' – 2 stories	1.0	-- <sup>7</sup>
<b>PI</b>	6,000	N/R	N/R	10 <sup>1</sup>	0	0	32' – 2 stories <sup>1</sup>	2.0	N/R

FAR= Floor Area Ratio

(\* ) Feet or Stories whichever is less

N/R = No Requirement

Notes:

1. Additional exceptions or requirements apply and can be found in Chapter 17.40. of the City’s Municipal Code.
2. All buildings located within the Old Towne residential quadrants shall have a minimum front yard setback of 20 feet.
3. Mobile Home Requirements vary based on Chapter 17.14 of the City’s Municipal Code.
4. Floor area ratio (FAR) shall vary according to lot area per the table below.
5. Additional exceptions or requirements apply and can be found in Chapter 17.18. of the City’s Municipal Code.
6. Specific requirements and additional exceptions or requirements apply and can be found in Chapter 17.19 of the City’s Municipal Code.
7. Senior housing developed in commercial zones is subject to NMU development standards.

Lot Area in Square Feet	Maximum FAR
<10,000	0.60
10,000—39,999	0.50
>40,000	0.40



### Yard Requirements

Yards shall provide for light and air, pedestrian and vehicular circulation, emergency access, and general aesthetic improvements. Minimum yard requirements vary among the residential districts. The primary purposes of imposing yard requirements to ensure adequate air and light between properties, to ensure adequate on-site access and circulation, to provide opportunities for private open space areas (yards), and to separate uses between properties to minimize conflicts and potential life/safety hazards. Yard requirements are generally tied to lot size, meaning smaller lots have lower minimum setbacks, and larger lots require larger “yards.” While it is possible that setback requirements may inhibit maximum density from being realized in some cases, there is enough flexibility in the current ordinances that setback requirements do not constitute a significant constraint on residential development. Setback requirements have been considered in the City's calculation of realistic site capacity.

### Lot Coverage and FAR

Lot coverage and floor area ratio (FAR) standards are intended to control bulk, mass, and intensity of a use. Lot coverage limits a building's footprint and is defined as the percentage between the ground floor area of building(s) and the net area of a lot. FAR limits the total usable floor area and is expressed as a ratio between the bulk floor area of building(s) and gross lot area. Floor area ratio is a supplementary device that under some conditions improves upon (but does not necessarily replace) the traditional means of relating bulk of building to land, to other buildings in the vicinity, and to public facilities. It permits variable dimensions within an over-all volume limit and it offers a way of predicting the ratio of persons to a unit of land in office building districts of high land use intensity.

In the residential-only zones maximum floor area ration ranges depending on desired density and requirements. For example, in the R1-6 through R1-20 districts maximum lot coverage ranges depending on the size of the lot area. For a lot are of less than 10,000 square feet, the FAR is 0.60, meaning that the building area may not be larger than 6,000 square feet. However, in districts aiming to achieve higher densities such as the R2-6 district maximum FAR increases to 0.07, allowing for more building coverage, accompanied by a small square footage requirement per unit (6,000 sf) providing for the potential of higher density developments. As applied to residential development, these standards may only limit the size of dwelling units, and do not limit the number of units, which is an expression of density (that is, zoning). FAR, combined with height limitations, can potentially prevent maximum density from being achieved in certain cases.

In evaluating recent residential projects within the City, lot coverage and FAR do not typically pose constraints to development at the maximum density.

### Maximum Building Height

Maximum building height standard are often in place to maintain community compatibility for new and proposed developments. In the City of Orange, the maximum allowable building height for residential zones is 32 feet or two stories and defaults the lesser of the two. However, greater height than the height limit established for a district or additional height and stories for habitable space in the R-3 and R-4



districts, may be considered by a Conditional Use Permit before the Planning Commission. In reviewing such a request, the Commission shall consider:

- Siting buildings or structures so as to achieve greater usable open space area than could be achieved with two story construction.
- Siting buildings or structures so as to consider shadows, solar orientation, and noise impacts, as well as respecting the terrain.
- Designing and/or screening all roof-top mechanical and electrical equipment as an integral part of the building design.
- Illustrating a design compatibility with both the existing and desired character of the surrounding area and uses.

### Usable Open Space

The City's Zoning Code defines Usable Open Space as an open area or an indoor or outdoor recreational facility which is designed and intended to be used for outdoor living and/or recreation. Open space provides areas for recreation and activity, it promotes the health of the community, green relief and urban cooling within a development. The City requires that all residential developments in the R-1, R-2, R-3, R-4 and Mixed Use zone districts shall provide a landscaped, unified, and usable open recreational and leisure area. For multifamily developments, each unit is required to have at least one area of private usable open space accessible directly from the living area of the unit, in the form of a fenced yard or patio, a deck or balcony. The City's open space requirements are not an undue constraint to the development of housing and often provide the necessary outdoor/open space resources for future residents.

### Parking Standards

In addition to the development standards identified in **Table 3-4**, Orange requires all spaces to be covered spaces for single family dwellings and a certain number of enclosed spaces for duplex and multifamily apartments as well as an additional space for all accessory living units. Guest parking is also required for multi-family housing at a ratio of 0.2 spaces for every unit. The City of Orange Zoning code provides additional direction for parking standards and regulation, such as additional standards for supportive and transitional housing. The City of Orange complies with density bonus parking rates established by the State for projects that meet density bonus requirements.



**Table 3-4: Parking Requirements for Residential Uses**

Unit Type	Number of Spaces Required			
<b>Single-family Dwelling</b>	2 enclosed garage spaces/unit up to 4 bedrooms. For 5 or more bedrooms, 1 additional enclosed space.			
	For PUDs, units with 3 or more bedrooms must provide an additional 1.5 guest parking spaces per dwelling unit.			
	One unenclosed parking space must be provided in excess of the code parking requirement for the existing residential use and no parking spaces are required for an accessory dwelling unit in any of the following instances: <ul style="list-style-type: none"> <li>• The accessory dwelling unit is located within one-half mile of public transit.</li> <li>• The accessory dwelling unit is located within an architecturally and historically significant district.</li> <li>• The accessory dwelling unit is part of the existing primary residence or an existing accessory structure.</li> <li>• When on-street parking permits are required but not offered to the occupant of the accessory dwelling unit.</li> <li>• When there is a car share vehicle located within one block of the accessory dwelling unit.</li> </ul>			
<b>Duplex, Duplex Residential</b>	2 parking spaces per unit, one of which shall be in an enclosed garage.			
<b>Multifamily Residential (3 units or more)*</b>	Development Size—3 units to 50 units		Development Size—51+ Units	
	Unenclosed resident parking is provided (e.g. parking structure, surface parking lots, carports):	If enclosed resident parking is provided:	If unenclosed resident parking is provided (e.g. parking structure(s), surface parking lots, carports):	If enclosed resident parking is provided:
<b>Studio*</b>	1.3 spaces/unit	1.4 spaces/unit	1.2 spaces/unit	1.4 spaces/unit
<b>One Bedroom*</b>	1.8 spaces/unit	1.9 spaces/unit	1.7 spaces/unit	1.9 spaces/unit
<b>Two Bedroom*</b>	2.3 spaces/unit	2.3 spaces/unit	2.0 spaces/unit	2.3 spaces/unit
<b>Three Bedrooms*</b>	2.6 spaces/unit	2.6 spaces/unit	2.4 spaces/unit	2.6 spaces/unit
<b>Each add'l bedroom above three*</b>	0.4 spaces/bedroom/unit	0.5 spaces/bedroom/unit	0.3 spaces/bedroom/unit	0.5 spaces/bedroom/unit
<b>Boarding house, bed and breakfast inns</b>	1 space/rentable room, plus any other additional spaces required by the underlying zone			
<b>Supportive Housing, Transitional Housing</b>	For Transitional Housing or Supportive Housing configured as group quarters (i.e. where beds are provided in individual rooms, but kitchen and/or bathroom facilities are shared), 1 space per bed, plus one space per onsite staff person.			
<b>Emergency Shelter Parking</b>	1 space per six beds, plus one space per staff person.			
<b>Student Housing</b>	0.5 space/student resident, plus 1 space/each resident staff person			
<b>Trailer park, mobile home park</b>	2 spaces/unit, (1 of which is covered, at least 2 sides of the carport shall be at a minimum 50% open and unobstructed) 1 guest space/3 trailers or mobile homes must be easily accessible and distinguishable guest parking. Tandem parking is permitted for the mobile home.			

Source: City of Orange, Municipal Code, accessed May 4, 2020.



**Table 3-4: Parking Requirements for Residential Uses**

Unit Type	Number of Spaces Required
<p>* Of the above requirements a minimum of one must be covered and a minimum of 0.2 spaces per unit shall (with a minimum of two guest spaces in a multifamily development) be provided as easily accessible and distinguishable guest parking in addition to the required parking for each unit.</p>	

Typically, the cost associated with garage parking construction can be viewed as a constraint to affordable housing development, particularly for multi-family housing. However, the City’s parking regulations are not a significant constraint because the number of required parking spaces for duplexes and multi-family projects varies by the number of bedrooms. Furthermore, affordable housing projects that qualify for a density bonus can request application for additional incentives which can be provided in the form of reduction of parking requirements. While off-street parking standards can affect planned residential density, especially for small lots and in-fill areas, this potential constraint is mitigated by the incentives and flexible standards described above.

#### 4. Planned Unit Developments

The Planned Unit Development (PUD) is established to provide an alternative to standard residential development wherein the existing General Plan densities are preserved but flexibility is provided by allowing the clustering of units and combining of open space, recreation areas and roadways under common ownership. In order to qualify for a PUD, the following findings must be made by the reviewing body to justify the approval:

- The project conforms to the General Plan in regard to land use designation and density.
- The project utilizes creative and imaginative planning and design features to create a quality living environment, equal to or better than what might be accomplished under the base zone designation.
- The project preserves unique physical, topographical or environmental features, where applicable.

A Conditional Use Permit before the Planning Commission and City Council is required for the establishment of a PUD. Additionally, a PUD must be adopted by Ordinance and indicated on the zoning map by the base zoning designation and the Conditional Use Permit number applicable to that PUD. A Planned Unit Developments may be located in any zone district zoned for residential use. The City plans to develop a Small Lot Subdivision Ordinance and Design Guidelines to increase the feasibility of residential developments.

#### Development Standards

The City of Orange Municipal Code (Title 17 Chapter 17.16.060) establishes development standards for all PUDs. The reviewing body for a PUD may require more stringent standards to ensure compatibility with surrounding uses, quality of life for future residents and protection of public health, safety, and general welfare.



**Table 3-5: PUD, Development Standards**

Table 3-5: PUD, Development Standards				
Type	Standards/Requirements			
<b>Density</b>	The total number of dwelling units permitted shall not exceed the number allowed by the General Plan. In establishing the density, the reviewing body shall consider compatibility with surrounding land uses and densities on adjacent parcels.			
<b>Building Height</b>	The underlying zone district shall govern the maximum permitted building heights for all structures within a PUD.			
<b>Building Separation</b>	Number of Structures	Front/Any Other Building Wall	All Other Configurations	Minimum Distance Between Principal and Accessory Structure
	One	N/A	N/A	6 feet
	Two to Four	15 feet	8 feet	6 feet
	Five or More	25 feet from view allowing windows in any adjacent structure. 15 feet minimum between solid facing walls, or when windows are located on only one facing wall.		6 feet
<b>Setback from Public Right of Way</b>	All structures (including walls or fences exceeding 42" in height) shall be setback a minimum of 20 feet from a public right-of-way. The required setback area shall be landscaped.			
<b>Project Area Boundary Setback</b>	All habitable structures shall be set back a minimum of ten feet from any project boundary not abutting a street. Buffer of trees or hedges shall be provided as appropriate to ensure compatibility with adjacent uses.			
<b>Interior Street Setbacks</b>	All structures shall be set back a minimum of ten feet from any interior street. Garage door openings shall be set back a minimum of 20 feet from any interior street, unless one additional parking space is provided for all units containing garages with driveways less than 20 feet in length. Such space must be conveniently located to the units.			

## 5. Local Ordinances

### Growth Management Measures

Growth management measures are techniques used by a government to regulate the rate, amount and type of development. Growth management measures allow cities to grow responsibly and orderly, however, if overly restricted can produce constraints to the development of housing, including accessible and affordable housing.

The Growth Management Element, a part of the City of Orange’s General Plan, intends to mandate growth and development in Orange be based on the City’s ability to meet the requirements of the Orange County voter-approved Revised Traffic Improvements and Growth Management Ordinance, Measure M. The Growth Management Element applies to all new development within Orange; however, the City may consider future project exemptions to encourage the development of affordable housing.

In 1990, Orange County voters approved Measure M authorizing a half-cent retail sales tax increase for a period of 20 years effective April 1,1991. County voters approved the renewal of Measure M, extending the tax increase through 2031. Revenue generated by Measure M is returned to local jurisdictions for use on local and regional transportation improvements and maintenance projects. To qualify for this revenue,



each jurisdiction must comply with the Countywide Traffic Improvement and Growth Management Program; requirements include:

- Adoption of a Growth Management Element that includes:
  - Traffic LOS standards,
  - A development mitigation program; and
  - A development phasing and annual monitoring program.
- Participation in interjurisdictional planning forums.
- Development of a 7-year CIP.
- Addressing housing options and job opportunities and,
- Adoption of a Transportation Demand Management Ordinance.

Implementation of the Growth Management Element is incorporated throughout the City’s established development review and monitoring process where possible. Specific goals and policies addressed in the Growth Management Element, that may be considered a constraint to the development of housing include the following:

- Policy 1.1: Establish LOS D as the level of service standard for traffic circulation within the City for both roadway segments and peak-hour signalized intersection movements.
- Policy 1.3: Ensure completion of transportation improvements as agreed upon by the City and developer prior to completion of a development project.
- Policy 1.4: Continue to collect transportation impact fees for improvements within the City boundaries and work with adjacent jurisdictions to determine that an appropriate level of transportation impact fees are maintained within the established County GMAs.
- Policy 1.10: Apply traffic calming measures, where appropriate, to residential neighborhoods affected by cut-through traffic in accordance with the City’s Residential Neighborhood Traffic Management Program.

The policies mentioned above, include measures to maintain traffic level of service when new developments are established, measures to ensure traffic improvements are made and fees are collected from developers, and traffic calming measures in residential area. The mentioned policies produce potential financial constraints on new developments through implementing potential infrastructure updates and fees to reduce congestion in Orange. While the policy may produce potential financial constraints, they ensure the existing fees are collected, and provide for a reasonable level of infrastructure maintenance in the City. The measure also states, the City may consider exemptions for affordable housing developments. Since adoption, Measure M has not proven to be a constraint on development and the City has continued to successfully receive and process applications for residential projects at all income levels.

### **Short Term Rental (STR) Ordinance**

The City of Orange defines a short term rental as the rental of a residential unit for 30 days or less. As established by Ordinance No. 05-21 (adopted on May 11, 2021) any owner of a property in a zone that allows residential uses, except in mobile home parks, who wishes to rent all or a portion of a property for



a period of 30 days or less is required to obtain a short term rental permit, business license, and proof of liability insurance.

Short term rentals must have a minimum 300 foot buffer between one-another, as measured from property line to property line. In addition, a maximum of two occupants are permitted and must stay for a minimum of two nights. Off-street parking is required on the property. The City provides information and short term rental permitting conditions online for interested homeowners.

Short term rentals may pose a constraint to housing access and may hinder the City from meeting its RHNA allocation; however, the City of Orange’s permitting process allows for the monitoring of short term rentals to avoid potential conflicts. Therefore, the City’s Short Term Rental Ordinance is not considered a constraint to housing.

## 6. Variety of Housing Types Permitted

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of types of housing for all income levels. **Table 3-6** below summarizes the City’s zoning provisions for various types of housing, as provided in the City’s Municipal Code available online. Permitted, conditional, and prohibited residential uses are indicated as follows:

- **P** = Permitted use.
- **C** = Conditional use permit required.
- - = Not permitted.
- **A** = Accessory use.
- \* = Use subject to special provisions contained in the Master Land Use Chapter of the City’s Zoning Code.
- + = Use subject to conditional use permit regulations.
- # = Use subject to special provisions contained in the Residential Chapter of the City’s Zoning Code.



Table 3-6: Permitted Residential Uses by Zone

Zoning	Residential Zones							Commercial Zones					Mixed Use Zones					Industrial Zones		Agricultural Open Space Zones			Pub. Inst. Zone	Overlay Zones		Sand & Gravel Zones		
	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Accessory dwelling unit (detached and attached)	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	A/P*/C+	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bed and breakfast inn	-	-	-	C+	C+	C+	-	C+	C+	-	C+	-	-	C+	C+	C+	-	-	-	-	-	-	-	-	-	-	-	-
Boarding and lodging houses	-	-	-	-	C	C	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Caretaker residence/caretaker mobile home	-	-	-	-	-	-	-	A*	A*	A*	A*	A*	-	-	-	-	-	-	A*	A*	A*	A*	-	A*	-	-	A*	
Condominiums	-	-	-	p*	p*	p*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Congregate care (assisted living) home health facility (6 or fewer persons)	p*	p*	p*	p*	p*	p*	p*	-	-	-	-	-	-	-	-	-	P	P	-	-	-	-	-	-	-	-	-	
Convalescent facility, skilled nursing facility	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	P	P	-	-	-	-	-	-	-	-	-	
Convalescent hospital	-	-	-	-	C	C	-	C	C	C	C	C	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Conversion of multi-family units (condominium conversion)	-	-	-	-	-	-	-	-	-	-	-	-	-	p*	p*	p*	p*	p*	-	-	-	-	-	-	-	-	-	
Duplex	-	-	-	p*	p*	p*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Fraternity, sorority	-	-	-	-	C	C	-	C	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	



Guest house	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A	-	-	-	-	-	-
Home for elderly, or mentally, or physically disabled persons (6 or fewer persons)	p*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-						
Homeless shelter	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	p*	p*	-	-	-	-	-	-	-	-
Hotels	-	-	-	-	-	-	-	-	C+	C+	C+	C+	P	C+	C+	C+	C+	C+	-	-	-	-	-	-	-	-	-
Motels	-	-	-	-	-	-	-	-	C+	C+	C+	C+	P	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Housing related to church, college or hospital	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A*	-	-	-
Live/work units	-	-	-	-	-	-	-	-	-	-	-	-	-	p*	p*	p*	p*	p*	-	-	-	-	-	-	-	-	-
Mixed use development	-	-	-	-	-	-	-	-	-	-	-	-	-	p*	p*	p*	p*	p*	-	-	-	-	-	-	-	-	-
Mobile home park	C	C	C	C	C	C	C	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mobile home, modular, or manufactured housing unit with permanent foundation	P	P	P	P	P	P	P	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	C+	-
Mobile home, modular, or manufactured housing unit without permanent foundation	-	-	-	-	-	-	P	-	-	-	-	-	-	-	-	-	-	-	p*	p*	-	-	-	-	-	C+	-
Multi-family housing as a stand alone development not in conjunction with a mixed use development	-	-	-	-	-	-	-	-	-	-	-	-	-	p*	p*	p*	p*	p*	-	-	-	-	-	-	-	-	-







Housing types are defined in the Orange Municipal Code as follows:

### **Single-family**

An attached or detached building not to contain more than one kitchen wherein the occupants of the dwelling unit are living and functioning together as a single housekeeping unit, meaning that they have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, expenses and responsibilities, membership in the single housekeeping unit is fairly stable as opposed to transient, and members have some control over who becomes a member of the single housekeeping unit. The City of Orange allows single family dwelling in the R1-5, R1-6, R-15 to R1-20, R-140, R1-R, R2-6 to R2-8, R-3, and R-4 zoning districts, as well as an accessory in the City's Mixed Use zoning districts.

### **Duplex**

Any attached or detached building containing two dwelling units wherein the occupants of each individual dwelling unit are living and functioning together as a single housekeeping unit, meaning that they have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, expenses and responsibilities, membership in the single housekeeping unit is fairly stable as opposed to transient, and members have some control over who becomes a member of the single housekeeping unit. The City of Orange allows duplexes in the R2-6-R2-8, R-3, R-4, and MH districts with special provisions contained in the Master Land Use Chapter of the City's Zoning Code.

### **Multi-family**

Any structure designed for human habitation that has been divided into two or more legally created independent living quarters. Currently, Multi-family housing is permitted with special provisions in all Mixed-Use Districts (either part of a mixed-use development or as a stand-alone use), and in the R2-6 to R2-8, R-3 and R-4 districts as stand-alone developments.

### **Condominium**

A building or group of buildings owned on a proportional basis with a specific benefit of ownership being the right to occupy an individual unit located within the structures. Condominiums are permitted in the R2-6-R28, R-3 and R-4 zones as an accessory use to a permitted use.

### **Communal Housing**

For nonfamily groups with common kitchen and dining facilities but without medical, psychiatric or other care including boardinghouses, lodging houses, dormitories, fraternity/sorority houses, communes, and religious homes. Communal Housing is written as fraternity or sorority and is permitted with conditions in the R-3 and R-4 districts.

### **Residential/Mixed Use Buildings**

The development of a tract of land or building or structure with two or more different uses such as, but not limited to, residential, office, manufacturing, retail, public, or entertainment, in a compact urban form.



The City recognizes both Horizontal Mixed-Use and Vertical Mixed-Use. Currently, five Mixed-Use districts exist in the City and allow for a range of housing types. Within Mixed Use zones, housing is permitted as part of mixed use development or as a stand-alone product.

#### *Congregate (Community) Care Facilities*

Any facility, place or building where non-medical care and supervision are provided for six or fewer persons (does not include the licensee or members of the licensee's family or persons employed as facility staff). Congregate care facilities are permitted with special requirements in all of the residential districts. However, per California State law, care facilities for six or fewer persons must be permitted under the same standards as ordinary residential uses.

#### *Boarding/Lodging Houses*

A residence or dwelling, other than a hotel, wherein three or more rooms are rented under three or more separate written or oral rental agreements, leases or subleases or combination thereof, whether or not the owner, agent or rental manager resides within the residence. Boarding and Lodging Houses are permitted conditionally in the R-3 and R-4 zones.

#### *Farmworker Housing*

The City of Orange currently does not have specific definitions or requirements for farmworker housing.

#### *Convalescent Facility/Hospital*

A use providing bed care and in-patient services for persons requiring regular medical attention, and persons aged or infirm unable to care for themselves, excluding surgical or emergency medical services. A Convalescent Hospital is a facility providing long-term nursing, dietary and other medical services to convalescents or invalids but not providing surgery or primary treatments such as are customarily provided in a hospital. A convalescent hospital must be licensed by the State as such.

#### *Senior Housing and Senior Housing Development*

Housing intended and operated for occupancy by persons 55 years of age or older that also meet the following criteria:

- At least 80 percent of the units must have at least one occupant who is 55 years of age or older; and
- The facility or community must publish and adhere to policies and procedures that demonstrate the intent to operate as "55 or older" housing; and
- The facility or community must comply with HUD's regulatory requirements for age verification of residents.

Senior Housing Development is defined the City's Code as a residential development developed, substantially rehabilitated, or substantially renovated for, qualifying residents that has at least 35 dwelling units and otherwise meets the requirements of Section 51.3 of the California Civil Code.



The City of Orange permits Senior Housing in all Residential and Mixed-Use districts and conditionally permits it in all Commercial districts. Senior Housing Developments are conditionally permitted in the R-3 and R-4 Residential districts, all Mixed-Use districts and OP, CP/C1, CTR, C2, C3 Commercial districts.

### **Mobile Homes/Manufactured Housing and Mobile Home Parks**

The Orange Municipal code defines Mobile/Manufactured Homes as a structure designed for human habitation and for being moved on a street or highway under permit. Mobile home includes a manufactured home but, except as provided in subdivision (b) of Section 798.3 of the California Vehicle Code for certain specified trailers and recreational vehicles, does not include a recreational vehicle or a commercial coach or commercial modular. A Mobile home Park is defined as any area or tract of land where two or more lots are rented or leased, held out for rent or lease, or were formerly held out for rent or lease and later converted to a subdivision, cooperative, condominium, or other form of resident ownership, to accommodate manufactured homes or mobile homes used for human habitation. Mobile homes with a permanent foundation are currently permitted in all residential districts and mobile homes without a permanent foundation are only permitted in the MH district.

### **Guest House**

The City of Orange defines Guest Houses as any rented or leased room which is used or designed to provide sleeping accommodations for one or more guests in apartments, hotels, motels, private clubs, lodges, and fraternal organizations. Guest Houses are permitted and considered an accessory use in the Agriculture District.

### **Accessory Dwelling Units**

An attached or detached permanent residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence. An ADU shall be accessory to the primary residence. It shall include permanent provisions for living, sleeping, eating, cooking and sanitation on the same parcel as the single-family or multifamily dwelling is or will be situated and shall include a common living area. The kitchen and common living area shall be of sufficient size to accommodate at least one person per bedroom. An ADU has the attributes of a private residence and not a boarding house or dormitory, e.g. shall not have microwaves, sinks and/or refrigerators in each bedroom; shall not have exterior access to each 2 bedrooms; shall not advertise individual rooms. An accessory dwelling unit also includes the following:

1. An efficiency unit, as provided under Health and Safety Code Section 17958.1; and
2. A manufactured home, as provided under Health and Safety Code Section 18007.

ADUs are limited to properties zoned to allow single-family or multifamily dwellings when the property includes a proposed or existing primary residence in the form of a single-family or multifamily dwelling. Properties zoned to allow residential uses exclusively as an accessory use, or as a use that is not permanent long-term housing, shall not be eligible for an ADU or JADU unless the property is exclusively developed with a primary, legal-nonconforming, long-term, permanent residential use. JADUs are limited to properties zoned to allow single-family dwellings when the property includes a proposed or existing



primary residence in the form of a single-family dwelling. ADUs and JADUs shall be an accessory use only, as defined herein. JADUs shall be located in a portion of a proposed or existing primary residence in the form of a single-family dwelling.

A program is included in the **Section 4: Housing Plan** to update the Municipal Code to permit ADUs and JADUs in zones which allow residential uses and to update the Section 17.13.030 Permitted Uses table to clarify where ADUs and JADUs are permitted in compliance with State law.

### Live/Work Uses

Live/work units are structures or spaces within structures that are used jointly for commercial and residential purposes. Allowed uses include:

- The nonresidential component of a live/work unit shall only be a nonresidential use allowed within a mixed-use zoning district, except that certain uses are determined to be not appropriate within a residential environment and are therefore prohibited as provided below.
- The residential component of a live/work unit shall only be a residential use allowed within a mixed-use zoning district.

Additional regulations and standards can be found in the City's Municipal Code Chapter 17.19.100.

### Homeless Shelter

A building that provides immediate and short-term overnight sleeping accommodations for homeless persons or families, with limited onsite supporting services. No person or family may be denied shelter at this facility due to the inability to pay. Temporary shelters established in response to an emergency or disaster (such as flood, fire or cold-weather occurrences), or temporary shelters ancillary to a church use do not fall within this definition. Notwithstanding, these uses shall comply with Federal, State and local regulations as applicable. Homeless Shelters are permitted in the M1 and M2 Industrial districts. The City currently has approximately 967 parcels zoned as M1 and M2 totaling about 968 acres. Of these, approximately 44 parcels over approximately 30.5 acres are currently vacant or underutilized. Homeless shelters are permitted to be developed on both vacant and nonvacant M1 and M2 parcels, with the potential for rehabilitation of existing structures.

These sites are located within close proximity to a number of public transportation stops, including bus routes 153, 59, 42, 46, 50, and 53. Homeless shelters are currently subject to the development standards of the underlying zoning district and the following requirements as established in Section 14.13.040 of the City's Municipal Code (as of adoption of the 2021-2029 Housing Element):

- Homeless shelters shall be located at least five hundred (500) feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12<sup>th</sup> grade curriculum school, as measured from the closest property line. In addition, homeless shelters shall be located at least two hundred seventy-five (275) feet from any other homeless shelter, as measured from the closest property line. Homeless shelters shall be located within ½-mile of a transit stop. As these siting requirements fall outside the scope of allowable standards relating to siting of homeless/emergency shelters per Government Code section 65583,



subdivision (a)(4)(A), the City has included Housing Policy Action 4J in the **Housing Plan** to ensure compliance with State law.

- Overnight occupancy shall be limited to one bed per seventy (70) square feet of sleeping area and shall be in accordance with Building Code requirements. Maximum occupancy per facility shall be limited to one hundred fifty (150) beds or fewer. For purposes of determining maximum occupancy, one shelter client per bed is assumed.
- Services and facilities shall be provided for homeless shelters as follows
  - A client intake and waiting area shall be provided and shall be adequately sized to accommodate waiting clients. The intake area may be indoors or outdoors. If outdoors, the location shall not be adjacent to the public right-of-way, shall be visually screened, and shall provide protection from the sun/rain.
  - The facility shall provide a sleeping area, and separate restrooms and showers for males and females. A minimum of one restroom and one shower for every twenty (20) clients shall be provided, and shall comply with Building Code requirements.
  - Other on-site services that are permitted include: laundry facilities; kitchen, food preparation, and dining areas; storage areas to secure client belongings; a private area for providing referral services to assist shelter clients in entering programs aimed at obtaining permanent shelter and income; other similar services for homeless clients, as determined by the Community Development Director.
- Prior to occupancy, a written operational plan for the facility shall be submitted to the Community Development Director for approval. If site plan review and/or design review applies, then the operational plan should be submitted and reviewed concurrently with those applications. The operational plan shall contain and comply with the requirements identified in the Section 14.13.040 of the City's Municipal Code.
- Exterior security lighting shall be provided. Building lighting shall comply with the City's Building Security Ordinance No. 7-79, Section 15.52.090J.2. Parking lots shall be lit in compliance with Section 15.52.090J.3.
- Required Off-street Parking and Bike Racks. One parking space per six beds, plus one space per staff person. Parking stalls shall be striped and bike racks shall be provided as specified in Chapter 17.34.
- The facility shall comply with all other laws, rules and regulations that apply, including building and fire codes and shall be subject to City inspections prior to operational plan approval. In addition, the City may inspect the facility at any time for compliance with the facility's operational plan and other applicable laws and standards.
- Minor Site Plan Review Required. Minor site plan review is required if the project meets the criteria established in Section 17.10.060.D or E. The Community Development Director's discretion in requiring conditions of approval and approving homeless shelters under minor site plan review is limited to ensuring that the site plan complies with applicable site design-related standards.
- Design Review Required. Design review is required if the project meets the criteria established in Section 17.10.070. DRC's discretion in requiring conditions of approval and approving homeless



shelters is limited to ensuring compliance with applicable design-related standards and guidelines.

### *Transitional Housing and Supportive Housing*

Transitional Housing is defined to be buildings configured as rental housing developments occupied by the state-defined "target population," but operated under program requirements that call for termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Transitional housing programs typically have specific criteria/thresholds for participation, include onsite staff and supportive services, and facilitate movement of tenants to permanent housing within two years.

Supportive Housing is defined to be buildings configured as rental housing developments with no limit on length of stay, that is occupied by the state-defined "target population," and that is linked to on- or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. (Ref: Health and Safety Code § 50675.14(b)) Supportive housing is intended to be permanent housing and is typically rented under legal lease agreements. Typically, on- or off-site supportive services are offered to tenants, but participation is not required to maintain tenancy.

Target population is defined as persons or families who are "homeless," or who are "homeless youth," or persons who are homeless with a disability as that term is defined in State and Federal law.

The City of Orange permits Supportive and Transitional Housing for six persons or fewer in all residential districts. Transitional and Supportive Housing for seven or more persons is conditionally permitted in the R-3 and R-4 districts.

### *Farmworker Housing*

Farmworkers are considered a special needs interest group by HCD. Farmworkers are traditionally defined as people whose primary incomes are earned through permanent or seasonal agricultural labor. Farmworkers are generally considered to have special housing needs due to their limited income and the often-unstable nature of their employment. In addition, farmworker households tend to have high rates of poverty, live disproportionately in housing that is in the poorest condition, have extremely high rates of overcrowding, and have low homeownership rates. There is a total of 1,772 farmworkers in the County of Orange. Though few may reside in the City of Orange, the City must consider the housing needs of this community. The City of Orange Municipal Code does not explicitly define Farmworker Housing or outline it as a permitted use in residential or nonresidential zones. Section 4: Housing Plan outlines the City's strategy to update the Municipal Code in accordance with state legislation.

### *Low Barrier Navigation Centers*

AB 101 states that "The Legislature finds and declares that Low Barrier Navigation Center developments are essential tools for alleviating the homelessness crisis -." Low Barrier Navigation Centers are defined as



a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. Low Barrier Navigation Centers are required as a use by right in areas zoned for mixed uses and nonresidential zones permitting multi-unit uses if it meets specified requirements. The City has approved 6 Low Barrier Navigation Centers since 2012. Additionally, the City provides financial support for operation of the North County navigation centers in Buena Park and Placentia.

The City of Orange’s Municipal Code does not address Low Barrier Navigations Centers by definition. **Program 4F** is included to ensure the City’s development standards allow Low Barrier Navigation Centers by-right in all zones that permit mixed-uses and non-residential uses. **Section 4** outlines the City’s strategy to update the Municipal Code in accordance with state legislation.

### Emergency Shelters

State Law existing law authorizes a political subdivision to allow persons unable to obtain housing to occupy designated public facilities, as defined, during the period of a shelter crisis. Existing law provides that certain state and local laws, regulations, and ordinances are suspended during a shelter crisis, to the extent that strict compliance would in any way prevent, hinder, or delay the mitigation of the effects of the shelter crisis. The City of Orange permits Emergency shelters in the M1 and M2 zoning districts.

### Single-Room Occupancy

As required in California Government Code Section 65583(c)(1), the City of Orange must identify sites which facilitate and encourage the development of a variety of types of housing for all income levels, including single-room occupancy. Currently, the City of Orange does not identify single-room occupancy units as a permitted use in the Municipal code, a program is included In **Section 4** to address this.

As defined by HUD, single-room occupancy units can provide affordable housing options for single persons living alone, young professionals, persons looking to transition into permanent housing or seniors looking to age in place in the community. Per HUD regulation, the unit must contain either food preparation or sanitary facilities (and may contain both) if the project consists of new construction, conversion of non-residential space, or reconstruction.

## 7. Housing for Persons with Disabilities

Both the Federal Fair Housing Amendment Act (FHAA) and the California Fair Employment and Housing Act direct require governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning laws and other land use regulations to afford disabled persons an equal opportunity to housing. State law also requires cities to analyze potential and actual constraints to the development, maintenance, and improvement of housing for persons with disabilities.

The Housing Element Update must also include programs that remove constraints or provide reasonable accommodations for housing designed for persons with disabilities. The analysis of constraints must



touch upon each of three general categories: 1) zoning/land use; 2) permit and processing procedures; and 3) building codes and other factors, including design, location and discrimination, which could limit the availability of housing for disabled persons.

### *Reasonable Accommodation*

Persons with mobility disabilities may require modifications to their living quarters such as access ramps, wider doors and hallways, larger bathrooms, and lowered countertops. The City enforces the California Building Standards Code which provides flexibility in the design of housing for persons with disabilities.

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act require local governments to make reasonable accommodations in their zoning laws and other land use regulations and practices when such accommodations are necessary to afford disabled persons with an equal opportunity to use and enjoy a dwelling.

Reasonable accommodation in the land use and zoning context means providing individuals with disabilities or developers of housing for people with disabilities, flexibility in the application of land use and zoning and building regulations, policies, practices and procedures, or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. For example, it may be reasonable to accommodate requests from persons with disabilities to waive a setback requirement or other standard of the Zoning Ordinance to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

The City of Orange has a Reasonable Accommodation Ordinance (17.10.045) which provides a procedure and sets standards for disabled persons seeking a reasonable accommodation in the provision of housing and is intended to comply with federal and state fair housing laws. A reasonable accommodation is defined as relief from the strict application of the City's zoning and land use regulations, policies, and practices when such an accommodation is found to be reasonably necessary to provide an individual with a disability an equal opportunity to use and enjoy a dwelling. An accommodation is not reasonable if: (1) it will fundamentally alter the City's zoning scheme or program; (2) the benefits provided by the accommodation are outweighed by the costs and administrative burden created; or (3) it would create a direct threat to the health and safety of other individuals or physical damage to the property of others.

Any person with a disability, their authorized written representative, or a developer or provider of housing for individuals with a disability may submit a request for a reasonable accommodation. A reasonable accommodation may be approved only for the benefit of one or more individuals with a disability. An application for a reasonable accommodation shall be made on a form provided by the Planning Department and the applicable processing fee (administrative adjustment fee shall apply to determinations of the Director) paid. The application shall include, but not necessarily be limited to the following information:

- Documentation that the applicant is: an individual with a disability; applying on behalf of one or more individuals with a disability; or a developer or provider of housing for one or more individuals with a disability.



- The specific exception or modification to the zoning code section, policy or practice that is being requested.
- An explanation that the accommodation requested is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy the dwelling.
- Any other information that the Director reasonably concludes is necessary to determine whether the findings required by this Chapter can be made.

### Occupancy Standards

Currently, the Zoning Ordinance defines a “family” as “One or more persons related by blood or legal status or persons not so related who are functioning as a family or single-housekeeping unit, meaning that they have established ties and familiarity with each other, jointly use common areas, interact with each other, share meals, household activities, expenses and responsibilities, membership in the family is fairly stable as opposed to transient and members have some control over who becomes a member of the family.”

California law requires local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. “Six or fewer persons” does not include the operator, the operator’s family or persons employed as staff. The City must allow these licensed residential care facilities in any area zoned for residential use and may not require licensed residential care facilities for six or less to obtain conditional use permits or variances that are not required of other family dwellings. Currently, the City permits, with special requirements, congregate care facilities in all residential zones, however, the City’s definition of family and restrictions which accompany permitting care facilities in residential zones may produce potential constraints in providing access to care facilities or housing opportunities and may not be in compliance with State law. **Section 4** of this Housing Element includes a Housing Policy Action to address the City’s code language and update the term “Family” for compliance with state law.

## 8. Development Fees

Residential developers are subject to a variety of fees and exactions to process permits and provide necessary services and facilities as allowed by State law. In general, these development fees can be a constraint to the maintenance, improvement, and development of housing because the additional cost borne by developers contributes to overall increased housing unit cost. However, the fees are necessary to maintain adequate planning services and other public services and facilities in the City. The current fee schedule became effective July 1, 2021 and is summarized in **Table 3-7** and available on the City’s website. Under the fee schedule, the City recovers a portion but not all of the City’s administrative costs for processing development applications. The City’s Development Impact fees, effective July 1, 2019 and remain in effect Until June 30, 2020, are summarized in **Table 3-8**.

The development fees associated with each project is dependent on the housing type, density, intensity of use, and location. In addition to these direct fees, the total cost of entitlement processing is contingent on the project meeting the City’s policies and standards, as well as the project applicant submitting



necessary documents and plans in a timely manner. An applicant may also request to have fees waived by the City Council.

The estimated total development and impact fees for a typical single-family residential project, assuming it is not part of a subdivision and is consistent with existing city policies and regulations, can range from \$22,090 to \$27,090. Estimated total development and impact fees for a typical multi-family residential project with ten units, assuming it is consistent with existing city policies and regulations range from \$81,913 to \$86,913.

These estimates are illustrative in nature and that actual costs are contingent upon unique circumstance inherent in individual development project applications. Considering the cost of land in Orange, and the International Code Council (ICC) estimates for cost of labor and materials, the combined costs of permits and fees range from approximately 3.79% percent to 4.65% percent of the direct cost of development for a single-family residential project and 1.62% percent to 1.72% percent for a multi-family residential project. Direct costs do not include, landscaping, connection fees, on/off-site improvements, shell construction or amenities, therefore the percentage of development and impact fees charged by the City may be smaller if all direct and indirect costs are included.

Type	Fee	Type	Fee
Sober Living Permit Fee	\$2,079.00	Major Site Plan Review	\$15,000.00
Mills Act Program Original Application Fee	\$1,000.00	Tentative Tract Map	\$2,000.00
Mills Act Program Inspection/ Annual Report	\$30.00	Zone Change Applications	\$10,000.00
Zone Clearance, Over the Counter Review	\$41.00	Negative Declaration	\$6,000.00
Staff research, information requests - per hour	\$116.00	Mitigation Monitoring	\$3,000.00
Temporary Use Permit (recurring)	\$369.00	General Plan Amendment	\$10,000.00
Temporary Use Permit (non-recurring uses)	\$791.00	Environmental Impact Report	\$10,000.00
Zoning Verification Letter	\$316.00	Appeals to City Council or Planning Commission	\$1,000.00
Administrative Design Review	\$500.00	Planning Commission Modification to CUP, Major Site Plan or Variance	\$3,000.00
Design Review, Historic Districts Residential	\$1,500.00	Minor Site Plan Review - Staff	\$1,000.00
Signs and Sign Programs	\$500.00	Pre-Application Review	\$500.00
Design Review, Outside Historic Districts	\$1,500.00	Administrative Adjustments	\$1,000.00
CUP / Variance - Zoning	\$3,000.00	Time Extension	\$1,000.00



Table 3-7: Planning and Land Use Fees (2021 Fee Schedule)			
Type	Fee	Type	Fee
CUP / Variance - Planning Commission	\$3,000.00		

Source: City of Orange, Master Schedule of Fees, Updated 7/1/2021.

Table 3-8: Engineering and Development Services Fees (2021 Fee Schedule)			
Type	Fee	Type	Fee
Lot Line Adjustment	\$1,956.00	Utility Lateral for house connection on residential streets	\$760.00
Certificate of Compliance	\$1,956.00	Fire Service Connection	\$1,444.00
Certificate of Correction / Amended Map	\$1,956.00	Flood Zone Written Notice	\$268.00
Process Grading Application	\$225.00	Street Addressing	\$583.00
Encroachment Permits		Summary Abandonment	\$1,416.00
Process Encroachment Application	\$201.00	Full Abandonment	\$1,416.00
Driveways - non-arterial	\$416.00	Quit Claims	\$1,416.00
Driveways - arterial	\$873.00	Simple Research & CD Prep	\$152.00
Sidewalk	\$404.00	Map Sheets	\$118.00
Street work / Trench Repair		Sewer Frontage Charges - per l.f.	\$128.00
0-100 feet	\$697.00	Tract Development	\$10,000.00
101-300 feet	\$988.00	Tract or Parcel Map (Map Only)	\$2,000.00
301-500 feet	\$1,586.00	Non-Priority Water Quality Management Plan (WQMP) Review	\$500.00
501-1000 feet	\$2,275.00	Priority Water Quality Management Plan (WQMP) Review	\$1,000.00
1,001-1,500 feet	\$2,838.00	Grading Plan Review & Inspection	\$3,000.00
1,501-2,000 feet	\$3,307.00	Large Encroachment Projects or Street work / Trenchwork 2,001 ft. or greater	\$5,000.00
Minor Encroachment Permit	\$289.00	Extensive Research	\$500.00

Source: City of Orange, Master Schedule of Fees, Updated 7/1/2021.

**Development Impact Fees**

In addition to City fees charged at the time building permits are issued, developers are required to pay a number of impact fees (shown in **Table 3.9**), including the following.

**Transportation System Improvement Programs Fee**

The Transportation System Improvement Programs Fee provides for the construction of the traffic circulation system improvements identified by the City Council and made necessary by increased transportation demands in the City. The fees charged are dependent on geographic locations and the fees



collected for pre-identified improvements must be used in the respective geographic regions. Regions (geographic indicators) include the following:

- Area A – Bound by Chapman to the north, Town and Country Road to the south, Flower Street to the west, and Montgomery Place to the East
- Area B – Bound by the Santa Ana River to the north and northwest, reaching Lewis Street to the west, bound by State Route 55 to the east, and State Route 22 to the south.
- Area C – Bound by the north Orange border adjacent to the City of Anaheim to the north, east Orange border to the east, Fairhaven Avenue to the south, and State Route 55 to the west.

Fees based on the geographic regions above are displayed in **Table 3-9**.

<b>Table 3-9: Transportation System Improvement Program Fees (Residential Only)</b>			
<b>Development Type</b>	<b>Area A Fee</b>	<b>Area B Fee</b>	<b>Area C Fee</b>
Single-Family; Condo & Townhome Residential (per unit)	\$817.00	\$1,445.00	\$804.00
Residential – Apartments (per unit)	\$712.00	\$1,015.00	\$564.00
<b>Foothill/Eastern Transportation Corridor Agency (Zone B – 55 to Weir Canyon Road)</b>			
<b>Development Type</b>	<b>Fee</b>		
Single Family Dwelling (per unit)	\$1,260.72		
Multi-Family, Apts. /Condos (per unit)	\$867.88		
Source: City of Orange Development Fee Schedule, July 1, 2021.			

### Capital Facilities Capacity Charges (Residential)

Capital Facilities Capacity charges are categorized housing type (single-family and multi-family) and number of bedrooms per unit. The base charges for residential developments are displayed in **Table 3-10**.

<b>Table 3-10: Capital Facilities Capacity Charges (Residential)</b>	
<b>Single Family Residential</b>	<b>Base Charge</b>
5+ Bedrooms	\$6,395.00
4 Bedrooms	\$5,475.00
3 Bedrooms	\$4,601.00
2 Bedrooms	\$3,727.00
1 Bedroom	\$2,852.00
<b>Multi-Family Residential</b>	<b>Base Charge</b>
4+ Bedrooms	\$4,969.00
3 Bedrooms	\$4,095.00
2 Bedrooms	\$3,221.00
1 Bedroom	\$2,300.00
Studio	\$1,472.00
Source: City of Orange Development Fee Schedule, July 1, 2019.	

Historically, where a single-family unit has an accessory dwelling structure/unit that connect to the sewer, the non-residential average demand base rate of \$2,078.00 per 1,000 square feet has applied. As of May



21, 2021, the Orange County Sewer District (OCSD) is not collecting sewer fees for ADUs smaller than 1,200 square feet. The maximum size for an ADU permitted by the City of Orange’s ordinance is 1,000 square feet, so sewer fees currently do not apply to ADUs within the City of Orange.

Additionally, live/work units will be charges at both the residential rate for the living quarters and at the nonresidential rate for the work portion square footage. The City continues to evaluate these fees. These are subject to change and the City will provide updated fees to the public if they change.

### Park Infill Fee and Park Dedication and In-Lieu Fee

Park Dedication and In-lieu fees are required for residential subdivision developments only and Park Dedication and In-lieu Fees provide for residential development projects to finance the cost of park facilities and improvements required by new residential development. The fees are described below in **Table 3-11**.

<b>Table 3-11: Park Dedication and In-Lieu Fees (Residential)</b>			
<b>District 1</b>		<b>District 2</b>	
<b>Density Classification (Dwelling Units/Gross Acre)</b>		<b>Density Classification (Dwelling Units/Gross Acre)</b>	
< or equal to 6 du/ga	\$7,994.00/unit	< or equal to 6 du/ga	\$8,894.00/unit
> 6 to < or equal to 15 du/ga	\$9,434.00/unit	> 6 to < or equal to 15 du/ga	\$10,469.00/unit
>15 du/ga	\$9,506.00/unit	>15 du/ga	\$10,546.00/unit

Source: City of Orange Development Fee Schedule, July 1, 2019.

### Public Service Development Impact Fees

Additional Public Service Impact Fees include library facilities impact fees, fire and police protection impact fees and school impact fees. The library facilitates development impact fee provides for new library facilities and other capital acquisition costs required, incrementally, by new residential development within the City. According to the Annual Financial Report for development impact fees for the fiscal year 2018 to 2019, the library facilities impact fee provided a total of \$294,662 in revenue.

<b>Table 3-12: Library Facilities Development Impact Fees (Residential)</b>	
<b>Citywide</b>	
<b>Density Classification (Dwelling Units/Gross Acre)</b>	
< or equal to 6 du/ga	\$742.52/unit
> 6 to < or equal to 15 du/ga	\$769.30/unit
>15 du/ga	\$642.71/unit

Source: City of Orange Development Fee Schedule, July 1, 2019.



<b>Land Use</b>	<b>Fee</b>
Detached Residential	\$1,200.00/unit
Attached Residential	\$601.00/unit
College University Dorm	\$971.00/unit
Group Congregate Units	\$2,306.00/unit
Commercial Lodging	\$955.00/unit
Single Family Dwelling	\$354.89/unit

Source: City of Orange Development Fee Schedule, July 1, 2019.

### Code and Fee Transparency

California Government Code Section 659401(a)(1) requires that every city or county make information regarding development processing applications, regulations, and fees readily available to the public. All such information is readily available to potential applicants, property owners, and the general public on the City of Orange website. The website is regularly maintained, and information is updated as needed.

## 9. On-/Off-Site Improvements

Site improvements in the City consist of those typically associated with development for on-site improvements (fronting streets, curbs, gutters, sewer/water, and sidewalks), and off-site improvements (drainage, parks, traffic, schools, and sewer/water). Residential developments utilize the following standards for local streets found in the 2010 General Plan Circulation and Mobility Element:

- Collector Streets- 66 feet right of way (46 feet pavement width)
- Secondary Arterial Highways- 86 feet right of way (70 feet pavement width)
- Primary Arterial Highways- 100 feet right of way (84 feet pavement width)
- Major Arterial Highways- 120 feet right of way (104 feet pavement width)
- Principal Arterial Highways and Smart Streets- 134 to 144 feet right of way (118 feet pavement width)

### *Payment in Lieu of Making Public Infrastructure Improvements*

Normally, the owner, lessee or agent of the property will post the required security for the public infrastructure improvements, obtain the building permit and then proceed with making the improvements as the construction project for which the building permit was issued progresses. When the construction project is completed, and the improvements are done and accepted by the City, the security is then released. There is an exception to this procedure, however, which requires full payment of the estimated cost of the improvements instead.

The Director of Public Works may require full payment of the estimated cost of the public infrastructure improvements when he has determined that the safe and orderly development of the adjacent street can be accomplished best when the public infrastructure improvements for more than just one lot are made or when allowing individual owners to make the public infrastructure improvements as single lots are developed may create unsafe traffic, drainage or other problems.



In that case, the owner, lessee or agent of the property shall make full payment of the estimated cost of the improvements to the City, which payment shall be maintained in a separate fund. When the improvements can be made safely, the City will cause the improvements to be made, financed in whole or in part with the money received from the various owners who have contributed to that fund. When an owner, lessee or agent of the property pays the estimated cost of improvements in full, he or his heirs, assigns and successors in interest to the property shall not be required to make additional payments to accomplish the same improvements.

## 10. Building Codes and Enforcement

The City of Orange's construction codes are based upon the California Code of Regulations, Title 24 (Building, Plumbing, Mechanical, Electrical and Housing Codes) and are considered to be the minimum necessary to protect the public health, safety and welfare of the City's residents. In compliance with State law, the California Building Standards Code is revised and updated every three (3) years. The newest edition of the California Building Standards Code is the 2019 edition with an effective date of January 1, 2020. The City of Orange is required by State law to enforce the new code.

All existing approved tract plans will expire and become null and void at 180 days from the date of enforcement (January 1, 2020) for the new 2019 California Codes, which will be July 1, 2020, or unless otherwise expired in accordance with other provisions of the codes. All tract plans will need to be updated to comply with the new 2019 CBSC and submitted for a new plan check. The Chief Building Official may extend the time for action by the applicant for a period not exceeding 180 days on request by the applicant showing circumstances beyond control of the applicant that prevented action from being taken (January 1, 2020). No building permit application shall be extended more than once (CBC Section 106.4.4).

Code enforcement is conducted by the City and is based on systematic enforcement in areas of concern and on a complaint basis throughout the city. The Code Compliance Division of the Community Development Department works with property owners and renters to assist in meeting state health and safety codes. The Code Compliance Division investigates complaints regarding violations of the Orange Municipal Codes. The City's caseload is complaint-based, and deals with issues such as inoperable vehicles, poor property maintenance, debris accumulation, and inappropriate storage of vehicles or materials with the intention and goal of working with the community to help resolve issues through voluntary compliance.

## 11. Local Processing and Permit Procedures

The processing time for entitlement applications and permits varies in Orange based upon the scope and type of project and the applicant's compliance with the City's ordinances and completeness of applications. Certain types of applications/permits are discretionary and require a public hearing, while others are processed administratively. For a typical single-family residence, permit processing time can take around 3-5 months for staff-level review of Administrative Design Review and around 3 months for Building plan check and permit issuance. For a typical multi-family project on a site that has a General Plan



Land Use and Zoning that allow multi-family developments, Planning review and entitlement can take around 6 to 8 months and 5 to 6 months for Building plan check and permit issuance. The process for projects requiring administrative review is outlined below. The following lists out the permitting process and review periods:

1. Application submitted;
2. Staff Review Committee provides comments or application deemed complete (30 days or less);
3. Staff Review Committee reviews response to comments, if applicable (30 days or less);
4. Design review Committee meeting scheduled and staff report prepared. Oversight is limited to confirmation objective design standards for applicable projects under State law (30 days or less);
5. Planning Commission meeting scheduled, staff report and resolution prepared. Oversight is limited to confirmation of objective design standards for applicable projects under State law (30 days or less);
6. Building plan check submittal – may occur at-risk subsequent to Design Review Committee meeting or sooner if authorized by the Community Development Director; followed by,
7. Staff review of building plans and corrections provided (20 working days or less per submittal/resubmittal).

Given the review period for each step of the review process is in compliance with State law requirements, the City's permit review process is not found to be a constraint to the development of housing, nor does it impact the cost of development.

### *Development Agreements*

The Community Development Director shall prescribe the form of each application, notice and documents provided for or required under this chapter for the preparation, processing and implementation of development agreements. The following sections outlines the process for development agreements within the City. Projects within Orange do not frequently involve development agreements.

### Filing and Review of Application

The application and proposed development agreement are forwarded to the Community Development Director and a staff review committee as designated by the City Manager. The Director and staff then review the application and determine the additional requirements necessary to complete the agreement. The Director may reject the application if it is not completed in the manner required by this chapter. After receiving the required information, the Director prepares a staff report which analyzes the proposed development and contains a recommendation as to whether or not the development agreement proposed, or in an amended form, would be consistent with the general plan or any applicable specific plan.

### Notice of Intention

Upon completion of the staff report, in addition to any other notice required by law, the Director gives notice of intention to consider adoption of a development agreement. The notice shall contain:

- The time and place of the public hearing before the Planning Commission;



- A general explanation of the development agreement, including a general description of the property proposed to be developed.

### Hearing and Recommendation of Planning Commission and Decision by City Council

The Planning Commission must make its recommendation to the City Council in writing within thirty (30) days of the public hearing. After the recommendation of the Planning Commission, the City Council completes the public hearing and considers any recommendation of the Planning Commission, the Council may accept, modify, or deny the proposed development agreement. The development agreement may not be approved unless the City Council finds that the development agreement is consistent with the General Plan and any applicable specific plan.

### Site Plan Review

The site plan review process provides a process to review development projects to ensure that projects reflect the highest quality of land planning and design, that projects conform to City development standards, that new projects are compatible with surrounding development and neighborhoods in terms of scale, style and construction materials, that on and off-site circulation is adequate to support the project; that City services are adequate and available, and to ensure the maintenance, restoration, enhancement and protection of the environment. Site plan review is a common step in entitlement of residential development projects.

Site plan review is required for the following:

- Any new use of previously vacant land
- New construction
- Rehabilitation or expansion of existing structures in all zones
- It is not required for single family residence or rehabilitation of existing single-family residence

In addition to project review for compliance with the development standards of the underlying zoning district and other applicable ordinance provisions, site plan review will include review of those development qualities which are not subject to precise definition in the regulations of each zone. The following criteria are listed to illustrate the issues to be considered by the Community Development Director and/or Planning Commission in project review and determination:

- Compatibility of the project with surrounding development and neighborhoods
- Building/Site planning issues
- Circulation/Traffic safety, on and off-Site
- City Services
- Environmental Protection - All projects shall be evaluated in accordance with the provisions of the California Environmental Quality Act

The following findings may be made after site plan review:

- That the project design is compatible with surrounding development and neighborhoods.



- That the project conforms to City development standards and any applicable special design guidelines or specific plan requirements.
- That the project provides for safe and adequate vehicular and pedestrian circulation, both on- and off-site.
- That City services are available and adequate to serve the project.
- That the project has been designed to fully mitigate or substantially minimize adverse environmental effects.

### Design Review

The design review process provides a means of reviewing development projects to ensure that these projects are compatible with community aesthetics including architectural design, massing and scale, context, color palette, signage and landscaping. The design review process serves a primary role in the implementation of adopted design standards. The City's design objective is to enhance the community character and identity of the City by promoting diversity, creativity and cohesiveness in the development of property, building structures, site relationships and landscape through quality design. Design review is required for all projects listed below:

- Development projects requiring Planning Commission or City Council approval
- Any project requiring major site plan review.
- All projects within Old Towne or other historic districts as established, except where otherwise exempted by adopted design standards and/or adopted specific plan
- External remodeling of commercial, industrial, institutional and large scale multiple family developments, except where otherwise exempted by City codes, including adopted design standards and/or adopted specific plans.
- Projects subject to Minor Site Plan Review that also involve exterior remodeling of residential, commercial, industrial, and institutional development that is visible from the public right-of-way.

The design review requires projects have an internally consistent, integrated design theme which is reflected in the following elements:

- Architectural Features
  - The architectural features shall reflect a similar design style or period.
  - Creative building elements and identifying features should be used to create a high quality project with visual interest and an architectural style.
- Landscape
  - The type, size and location of landscape materials shall support the projects overall design concept.
  - Landscaping shall not obstruct visibility of required addressing, nor shall it obstruct the vision of motorists or pedestrians in proximity to the site.
  - Landscape areas shall be provided in and around parking lots to break up the appearance of large expanses of hardscape.
- Signage



- All signage shall be compatible with the building(s) design, scale, colors, materials and lighting.
- Secondary Functional and Accessory Features.
  - Trash receptacles, storage and loading areas, transformers and mechanical equipment shall be screened in a manner which is architecturally compatible with the principal building(s).

The administrative design review process is established to allow for a simplified review process for specific types of new development, exterior building alterations, and sign modifications which the City anticipates will not adversely affect surrounding properties. The following types of projects are eligible for Administrative Design Review:

- Projects subject to Minor Site Plan Review that also involve exterior remodeling of residential, commercial, industrial, and institutional development that is not visible from the public right-of-way.
- Projects that involve exterior remodeling of an individual free-standing commercial, industrial, or institutional building on an individual parcel that is not part of a larger center or campus, including changes in exterior building material, roof form, and window or door openings.
- Infill residential development as specified in the City of Orange Infill Residential Design Guidelines.
- Modifications to existing sign programs that involve changes in color, font style, height, width, method of illumination or sign area that are otherwise in compliance with the provisions of Section 17.36.

The Design Review Committee makes a recommendation or final determination as authorized by Section 17.08.020(D) of the Orange Zoning Ordinance to approve, approve with conditions or deny a project at a public meeting. The reviewing body shall make findings for all projects based upon design criteria stated above. A specific finding shall be made for projects as follows:

- In the Old Town Historic District, the proposed work conforms to the prescriptive standards and design criteria referenced and/or recommended by the Design Review Committee or other reviewing body for the project.
- In any National Register Historic District, the proposed work complies with the Secretary of the Interior's standards and guidelines.
- The project design upholds community aesthetics through the use of an internally consistent, integrated design theme and is consistent with all adopted specific plans, applicable design standards and their required findings.
- For infill residential development, as specified in the City of Orange infill residential design guidelines, the new structure(s) or addition are compatible with the scale, massing, orientation, and articulation of the surrounding development and will preserve or enhance existing neighborhood character.



The City has analyzed the required findings listed above applicable to residential project for problematic or potential unclear language which may present a constraint to the development of housing. The City a streamlined set of findings for both the Site Plan Review and Design Review processes and the processes and expectations are clearly outlined. Furthermore, the City conducts pre-application meetings with applicants to walk through the entitlement process and explain the required findings. City Staff has printed and online materials to give guidance on how to navigate the entitlement process for residential projects and is available during business hours at the counter to provide assistance. City Staff communicates expectations to applicants so that they may be fully aware of the requirements and findings which need to be met for different types of residential projects. Within the planning period, the City has not denied any projects on the basis of not being able to meet the current findings for either Site Plan Review or Design Review.

While the current findings and processes do not present a constraint, the City has included Housing Policy Actions 2E and 2L in **Section 4: Housing Plan** to evaluate processing procedures and review the feasibility of additional regulatory relief – such as adopting objective development standards.

#### Senate Bill 35

California Senate Bill 35 (SB 35), codified at Government Code Section 65913.41, was signed on September 29, 2017, and became effective January 1, 2018. SB 35 will automatically sunset on January 1, 2026 (Section 65913.4(m)). The intent of SB 35 is to expedite and facilitate construction of affordable housing. SB 35 applies to cities and counties that have not made sufficient progress toward meeting their affordable housing goals for above moderate- and lower-income levels as mandated by the State. In an effort to meet the affordable housing goals, SB 35 requires cities and counties to streamline the review and approval of certain qualifying affordable housing projects through a ministerial process.

A project must meet the following criteria to be eligible for SB 35 approval:

- A multifamily housing development (at least two residential units) in an urbanized area, an urban cluster, or on a legal parcel(s) within the boundaries of an urbanized area or urban cluster;
- Located where 75% of the perimeter of the site is developed;
- Zoned or designated by the general plan for residential or mixed use residential, with at least two-thirds of the square footage of the development designated for residential use;
- In a location where the locality's share of regional housing needs have not be satisfied by building permits previously issued;
- One that includes affordable housing in accordance with SB 35 requirements; and
- Consistent with the local government's objective zoning and design review standards.

A project does not qualify for SB 35 streamline processing if:

- A coastal zone, conservation lands, or habitat for protected species;
- Prime farmland or farmland of statewide importance;
- Wetlands or lands under conservation easement;
- A very high fire hazard severity zone;
- Hazardous waste site;



- Earthquake fault zone;
- Flood plain or floodway;
- Lands identified for conservation in an adopted natural community conservation plan;
- Habitat for protected species;
- Land under conservation easement;
- A site with existing multi-family housing that has been occupied by tenants in the last ten years or is subject to rent control;
- A site with existing affordable housing; or
- The development would require the demolition of a historic structure.

According to HCD’s 2021 SB 35 Statewide Determination Summary, the City of Orange has not made sufficient progress towards its Lower Income RHNA and is therefore subject to streamlined ministerial approval process (SB 35 (Chapter 366, Statutes of 2017) streamlining) for proposed developments with at least 50 percent affordability. The City is subject to streamlined ministerial approval review for proposed developments with at least 50 percent affordability.

## 12.State Policies and Regulations

State policies and regulations may also serve to constrain housing development in local communities.

### Environmental Protection

State regulations require environmental review of proposed discretionary projects (e.g., subdivision maps, use permits, etc.). Costs resulting from fees charged by local government and private consultants needed to complete the environmental analysis, and from delays caused by the mandated public review periods, are also added to the cost of housing. However, the presence of these regulations helps preserve the environment and ensure environmental safety to Orange residents.

## C. Infrastructure Constraints

Another factor that could constrain new residential construction is the requirement and cost to provide adequate infrastructure (major and local streets; water and sewer lines; and street lighting) needed to serve new residential development. In most cases, where new infrastructure is required, it is funded by the developer and then dedicated to the City, which is then responsible for its maintenance. Because the cost of these facilities is generally borne by developers, it increases the cost of new construction, with much of that increased cost often “passed on” in as part of home rental or sales rates.

### 1. Dry Utilities

Dry utilities are the installation of the electric, telephone, TV, internet, and gas in a community. Of the utilities, the City must plan to provide the necessary resources, such as electric and gas, to new housing units.

Dry utilities in Orange are serviced by contracted private agencies, including Southern California Edison Company, Southern California Gas Company, AT&T, Time Warner Cable and Cox Communications Orange County.



### Electricity

Southern California Edison (SCE), an independently owned utility, provides electrical power service to the Orange planning area. SCE distributes electricity purchased through the California Power Exchange, which is the electricity marketplace for about 80 percent of California’s electricity customers. SCE is regulated by the California Public Utilities Commission (CPUC) and the Federal Energy Regulatory Commission (FERC) and includes 50,000 square miles of SCE service area across Central, Coastal, and Southern California.

In order to meet future energy needs, SCE has developed several energy-efficiency programs for residential, non-residential, new construction, and low-income subscribers. These include rebate and cash incentive programs for completion of energy-efficiency projects in residences and businesses, providing energy-efficient solutions for new developments as well as programs that aid low-income customers to purchase energy-efficient refrigerators and outdoor lighting. The City supports these strategies by SCE to encourage energy conservation, and applies the Green Building Code.<sup>1</sup>

### Natural Gas

The Southern California Gas Company (The Gas Company) supplies natural gas to both businesses and residents within the Orange planning area. The SoCal Gas 2020 utility report projects total gas demand to decline at an annual rate of 1 percent from 2020-2035. From 2020-2035, residential demand is expected to decline from 230 Bcf to 198 Bcf. The decline is approximately 1 percent per year, on average. The decline is due to declining use per meter—primarily driven by very aggressive energy efficiency goals and associated programs— offsetting new meter growth.<sup>2</sup>

SoCalGas engages in several energy efficiency and conservation programs designed to help customers identify and implement ways to benefit environmentally and financially from energy efficiency investments. Programs administered by SoCalGas include services that help customers evaluate their energy efficiency options and adopt recommended solutions, as well as simple equipment-retrofit improvements, such as rebates for new hot water heaters.

## **2. Water Supply and Wastewater Capacity**

The Water Division of the City of Orange’s Public Works Department is responsible for providing a clean, safe, potable water supply to the City of Orange. The Division designs, constructs, and maintains wells, water lines, booster pumps, and reservoirs that serve the residents and businesses with water for domestic use and for fire protection.

### Water Supply

According to the City’s 2015 Urban Water Management Plan (UWMP), the City of Orange obtains approximately 75 percent of its water from ground water sources via 12 active wells. The ground water basin is managed by the Orange County Water District. The City of Orange also imports water from

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<sup>1</sup> City of Orange Infrastructure Chapter, General Plan.

<sup>2</sup> SoCal Gas 2020 California Gas report, Prepared in Compliance with California Public Utilities Commission Decision D.95-01-039



the Colorado River and Northern California from the Metropolitan Water District of Southern California (Metropolitan) through the Municipal Water District of Orange County.

Historically, local groundwater has been the cheapest and most reliable source of supply for the City. The City currently relies on approximately 20,623 acres feet per year (AFY) of groundwater from the OC Basin. The City supplements its local groundwater with imported water purchased from Metropolitan through MWDOC. Imported water represents approximately 30 percent of the City's total water supply.

### Supply Reliability

The City's UWMP assesses the reliability of water service to customers under normal, dry, and multiple dry water years. The City depends on a combination of imported and local supplies to meet its water demands and has taken multiple steps to ensure it has adequate supplies. Increased residential and commercial development can augment the reliability of the imported water system. There are various factors that may impact reliability of supplies such as legal, environmental, water quality and climatic which are discussed below. The water supplies are projected to meet full-service demands; Metropolitan's 2015 UWMP finds that Metropolitan is able to meet, full-service demands of its member agencies starting 2020 through 2040 during normal years, single dry year, and multiple dry years.

The City meters all service customer connections and bills its customers bi-monthly based on water consumption. The City has a meter replacement and calibration program and plans to implement radio read metering.

### Wastewater Capacity

The City operates and maintains 308 miles of local sewer collection pipes that feed into the Orange County Sanitation District's (OCSD) trunk sewer system to convey wastewater to OCSD's treatment plants. OCSD has an extensive system of gravity flow sewers, pump stations, and pressurized sewers. OCSD's Plant No. 1 in Fountain Valley has a capacity of 320 million gallons per day (MGD) and Plant No. 2 in Huntington Beach has a capacity of 312 MGD. Both plants share a common ocean outfall, but Plant No. 1 currently provides all of its secondary treated wastewater to OCSD's Groundwater Replenishment System (GWRS) for beneficial reuse.

## 3. Fire and Emergency Services

The City of Orange's Fire Department aims to prevent or minimize the loss of life, damage to the environment, and loss of property from fire, medical emergencies, and hazardous conditions. Beyond fire suppression, public safety, and emergency medical services, the department offers a Fire Explorer program, smoke detector installation, and public education.

### Fire Prevention

The first priority of the Fire Prevention Section of the Orange City Fire Department is to prevent loss of life and property, and to prevent damage to the environment. The second goal is to build safety into buildings and processes, in order to contain or limit the spread of a potential emergency.



The activities of the Fire Prevention Section can be classed into 1) Environmental Safety and 2) Fire and Life Safety. Environmental Safety encompasses vegetation management, hazardous materials disclosure, and underground storage tanks. Fire and Life Safety includes planning and development, annual occupancy inspections, special events permitting, and fire cause investigation.

In addition to responding to urban fires, the department also responds to wildfire and provides education and safety plans for the community in the event of a wildfire.

### Emergency Operations

The Emergency Operation Section prepares for and responds to emergencies of all types. In addition to planning and training for emergency responses, the Section also works to ensure sufficient facilities, fire vehicles, equipment and other infrastructure are acquired and maintained before they are needed for emergency incidents.

Three battalion chiefs report to the Operations Deputy Chief. They command three shifts of 35 emergency responders who are on duty around the clock. The battalion chiefs spend the bulk of their time working on special projects to plan for emergencies. All three battalion chiefs lead departmental committees and other efforts related to emergency preparedness and response.

According to the Department's annual reports, in 2018, Orange City Fire Department responded to over 15,500 calls for service for the third year running and responded to over 16,000 for 2019. The departments have an extensive network, and preparedness, therefore, it is not anticipated that any new fire or emergency facilities would be required as a result of new development. Additionally, any new developments would be provided full services by one of the department's eight districts with a station.

## 4. Police Services

The City of Orange Police Department is in charge of police services for all areas within the City boundary. The department's jurisdiction covers nearly 27 square miles and is bordered by Santa Ana, Garden Grove, Anaheim, Tustin, and unincorporated County areas. The Police Department handles a variety of public services through different divisions. The department's mission is to perform law enforcement duties with innovative leadership, accountable to the residents of Orange, in order to ensure their safety and improve the quality of life in a diverse community. The Supportive Services Division provides personnel, training, fiscal affairs, crime prevention, and facility maintenance functions.

The Investigative Services Division investigates and prepares cases for a successful prosecution by the Orange County District Attorney's Office. Each unit focuses on specific types of crimes. The Field Services Division consists of uniformed personnel who are primary responders when the department receives calls for service. There are several specialized units, including the Bike Team, Canine Unit, Homeless Engagement Assistance and Resource Team (HEART), SWAT Team, and Traffic Bureau.



The department has an extensive network, and preparedness, therefore, it is not anticipated that any new police facilities would be required as a result of new development. Any new developments would be provided full services in any part of Orange.

## D. Environmental Constraints

### 1. Geologic and Seismic Hazards

The most significant environmental hazards that may affect land use in Orange are seismic and geologic hazards. Earthquakes and their related effects have the greatest potential to affect a large portion of the population. Other geologic hazards such as landslides and ground subsidence could have more localized effects. The combination of sound planning practices and continued public education will minimize risks to the community from seismic and geologic hazards, and will protect the health, safety, and welfare of Orange residents.

### 2. Flooding

Portions of Orange are susceptible to flood events from either a major storm or a dam failure resulting from a significant earthquake. Dams are present along Santiago Creek at two locations: Villa Park Dam and Santiago Dam (Irvine Lake). Both are located in the foothills of east Orange. Peters Canyon Dam is located within Peters Canyon about two miles west of Irvine Lake. Unlike Santiago Creek, which flows generally northwest, Peters Canyon drains to the south in this area. Prado Dam is located in Corona, approximately seven miles northeast of the eastern portions of the planning area. Areas downstream from these dams, including large areas within the City of Orange, have high potential for inundation in the unlikely event of catastrophic dam failure (maps showing dam inundation areas are available for public review at the Community Development Department). These dams and their reservoirs prevent periodic flooding that would be expected to occur in a natural setting. Recognizing and preparing for floods allows the community to avoid associated dangers.



# Housing Resources

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## E. Regional Housing Needs Allocation

This section of the Housing Element provides an overview of the resources available to the City to meet its Regional Housing Needs Allocation (RHNA).

### 1. Residential Sites Inventory

**Appendix B** of the Housing Element includes the required site analysis and site information for the parcels identified to accommodate the City's RHNA need through the 2021-2029 planning period. The following discussions summarize the City's site inventory, including the City's past experience in redeveloping non-vacant sites and sites within non-residential zones. Sites with these characteristics comprise the majority of Orange's site analysis strategy.

The City of Orange has identified sites currently zoned for residential and mixed-use which can accommodate its 6<sup>th</sup> cycle RHNA need.

### 2. Above Moderate and Moderate Income Sites

For the 2021-2029 planning period, the City's RHNA allocation is 677 for moderate income units and 1,588 for above moderate-income units. The City anticipates the ability to meet the moderate and above moderate income housing unit need through a mixture of existing residentially zoned areas as well as some of the mixed use areas within the community. Furthermore, approximately 103 accessory dwelling units (ADUs) are anticipated to be developed within the moderate and above moderate income RHNA categories.

#### ANALYSIS OF THE CITY'S EXISTING CAPACITY AND ZONING

The Housing Element must demonstrate the City's ability to accommodate the RHNA either through production or the availability of properly zoned land that can accommodate additional growth. The City of Orange is able to accommodate all of its moderate and above moderate income RHNA need through available land with existing zoning classifications that permit residential as a primary use, as well as through the anticipated development of accessory dwelling units.

**Appendix B** in this document contains a list and description of the sites designated to meet the City's moderate and above-moderate need. **Table 3-14** below summarizes the capacity of the sites by current zoning classification which can accommodate 732 moderate income and 1,777 above moderate-income dwelling units. In conjunction with ADU development, these amounts exceed the City's 2021-2029 RHNA allocation as shown in **Table 3-17**.



**Table 3-14: Residential Capacity for Moderate and Above Moderate Income Sites**

	Max Density du/acre	Reasonable Density du/acre	Number of Parcels	Acreage	Potential Units
<b>Above Moderate Income Sites</b>					
<b>R-1-7</b>	8	6	2	13.57	81
<b>UMU</b>	60	55	15	40.88	1,696
<b>Subtotal</b>	--	--	17	54.45	1,777
<b>Moderate Income Sites</b>					
<b>NMU-24</b>	24	16.3	9	7.28	114
<b>UMU</b>	60	55	4	14.92	618
<b>Subtotal</b>	--	--	13	22.20	732
<b>Total</b>	--	--	56	76.64	2,509

**REASONABLE CAPACITY ASSUMPTIONS**

This section describes the methodology developed to determine the site capacity for the moderate and above moderate-income sites. Reasonable capacity for sites identified to meet the City’s above moderate need was calculated based on a number of factors, including site size, existing zoning requirements, and the maximum density achievable for projects within all residential and mixed-use zones. Based on the analysis conducted, it was determined that the identified sites within the existing R-1-7, NMU-24, and UMU zones and projected ADU production could accommodate the City’s moderate and above moderate income RHNA need without any changes to the existing zoning.

Reasonable capacity for sites identified to meet the City’s moderate need was calculated based on the same methodology described above, however the methodology assumed development of sites at reasonable density assumptions (identified in **Table 3-14** above) consistent with the City’s Land Use Element. These densities are below the maximum density permitted in each zone and provide a conservative estimate on potential development yield on the identified sites.

Potential constraints, to the extent they are known, such as environmentally sensitive areas and steep slopes were considered and deductions made where those factors decreased the net buildable area of a parcel. Additionally, existing units on non-vacant parcels were analyzed to determine the number of existing units currently on the parcel. Replacement of existing units was included as a factor within the City’s analysis and existing residential units were factored out of the anticipated development yield.

**3. Sites Suitable for Lower Income Housing**

The City of Orange has a RHNA need of 1,067 very-low income units and 604 low-income units. The City has identified mixed-use zoned parcels that permit development at up to 60 dwelling units per acre which can accommodate 1,522 dwelling units. The City also anticipates the development of 217 affordable ADUs based on the methodology described in this section. This is in excess of the City’s 1,671 unit low and very-low RHNA need by 68 units, or an additional 4 percent. As demonstrated in this section, the City of Orange



has the capacity to accommodate their RHNA need and believes based on past performance of developing affordable projects that this is an appropriate buffer should some sites not develop as anticipated. In addition, the City has made conservative unit yield assumptions, including:

- An assumption that projects within the Urban Mixed Use (UMU) zone, which is anticipated to accommodate the City’s lower income RHNA need, will develop at 55 dwelling units per acre. Projects in this zone are permitted up to 60 dwelling units per acre and may go higher if they incorporate density bonus provisions.
- An assumption that only 25 percent of units included within a project will develop at the affordable levels. While it is likely that not all projects will develop with a 25 percent affordable component, the City has a history of building 100 percent affordable projects which can offset a potential deficit.

Orange is a primarily built out City with little available vacant land that can be developed for residential uses. Where possible, the City has identified vacant land and included those parcels within the sites inventory located in **Appendix B**. As shown in **Table 3-15**, all of the City’s lower income RHNA need is anticipated to be accommodated within the UMU zone, which can accommodate development at up to 60 dwelling units per acre. **Table 3-18**, shown later in this section, describes recent residential projects developed in the UMU zone, including the use prior to developing for housing and a project analysis which shows why these types of projects are good comparative examples of the types of residential the City anticipates in this zone during the 6<sup>th</sup> cycle planning period.

The very-low and low-income sites inventory within **Appendix B** describes each of these sites, with information provided per the HCD required data tables. Dwelling unit yield for each of the parcels within this inventory were analyzed to determine a net parcel size based on the City’s established definition of net acreage and known physical and environmental constraints.

Non-vacant sites designated to meet the very-low and low-income RHNA need that have been identified in a previous Housing Element and vacant sites designated to meet the very-low and low-income RHNA need that have been identified in two previous housing elements will also be required to permit ‘by-right’ approval for any project with 20 percent low income housing that does not involve a subdivision per State law. This is described in **Program 2L** within the Housing Plan.

<b>Table 3-15: Residential Capacity for Very Low- and Low-Income Sites</b>					
	<b>Max Density</b>	<b>Reasonable Density</b>	<b>Number of Parcels</b>	<b>Acreage</b>	<b>Potential Units</b>
<b>Urban Mixed Use (UMU)</b>	60	55	36	56.25	1,522
<b>Total</b>	--	--	36	56.25	1,522

**EXISTING OR PLANNED POLICIES AND PROGRAMS**

The City of Orange has several mixed-use districts oriented towards introducing residential uses into historically commercial/office/industrial areas of the community at higher densities than the single-family neighborhoods found throughout the city. The Urban Mixed Use (UMU) zone was established to provide



urban, high-intensity, regionally-oriented activity centers. Per the City’s zoning code, residential development is allowed, either as part of a mixed use project or as a freestanding use. Convenient transit access, innovative housing options, and pedestrian-oriented design are key considerations for development within the UMU zone. Permitted densities within this zone range from 30-60 du/ac, well above the default density for Orange.

**REGIONAL HOUSING NEEDS ALLOCATION**

**Future Housing Needs**

Future housing need refers to the share of the regional housing need that has been allocated to the City. HCD supplies a regional housing goal number to the SCAG. SCAG is then mandated to allocate a portion of the overall housing units for the region to each city and county jurisdictions in the region through a RHNA Plan. In allocating the region’s future housing needs to jurisdictions, SCAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing;
- Employment opportunities;
- Availability of suitable sites and public facilities;
- Commuting patterns;
- Type and tenure of housing;
- Loss of units in assisted housing developments;
- Over-concentration of lower income households; and
- Geological and topographical constraints.

SCAG adopted its RHNA in March 2021. This RHNA covers an 8-year planning period (starting in 2021) and addresses housing issues that are related to future growth in the region. The RHNA allocates to each city and county a “fair share” of the region’s projected housing needs by household income group. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the Orange County region.

The City of Orange’s share of the SCAG regional growth allocation is 3,936 new units for the current planning period (2021-2029). **Table 3-16, Housing Needs for 2021-2029**, indicates the City’s RHNA need for the stated planning period.

<b>Table 3-16: City of Orange Housing Needs for 2021-2029</b>		
<b>Income Category (% of County AMI)</b>	<b>Number of Units</b>	<b>Percent</b>
<b>Extremely Low (30% or less)</b>	534	
<b>Very Low (31 to 50%)<sup>1</sup></b>	1,067	27.1%
<b>Low (51 to 80%)</b>	604	15.3%
<b>Moderate (81% to 120%)</b>	677	17.2%
<b>Above Moderate (Over 120%)</b>	1,588	40.4%
<b>Total</b>	<b>3,936</b>	<b>100.0%</b>



Note 1: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low income households (0-30% AMI). In estimating the number of extremely low income households, a jurisdiction can use 50% of the very low income allocation or apportion the very low income figure based on Census data.

Source: Final Regional Housing Needs Allocation, SCAG, 2021

### ADEQUACY OF SITES FOR RHNA

The City of Orange has a total 2021-2029 RHNA allocation of 3,936 units as show in **Table 3-17**. The Housing Element update lists sites, including accessory dwelling units, that can accommodate approximately 4,352 additional units, 416 units in excess of the required 3,936 units. As described in this section, the City believes that due to recent State legislation and local efforts to promote accessory dwelling unit production, the City can realistically anticipate the development of 320 ADUs within the 8-year planning period. Overall, the City has adequate capacity to accommodate its 2021-2029 RHNA with a five percent buffer in excess of the City’s very-lower income RHNA need and a 2 percent buffer in excess of the City’s lower income RHNA. The City of Orange believes that due to the realistic assumptions outlined in this section, this buffer will be adequate to accommodate sites within the inventory that may not develop at the anticipated affordability level.

**Table 3-17: Summary of RHNA Status and Sites Inventory**

	Extremely Low/ Very Low Income Units*	Low Income Units	Moderate Income Units	Above Moderate Income Units	Total
2021-2029 RHNA	1,067	604	677	1,588	3,936
RHNA Credit (Units Built)	--	--	--	--	--
<b>Total RHNA Obligations</b>	<b>1,067</b>	<b>604</b>	<b>677</b>	<b>1,588</b>	<b>3,936</b>
<b>Sites Available</b>					
Residential Zones	0	0	0	81	81
NMU-24	16	4	114	0	134
Urban Mixed Use (UMU)	1,025	478	618	1,696	3,817
<b>Total Potential Capacity Based on Existing GP and Zoning</b>	<b>1,041</b>	<b>482</b>	<b>732</b>	<b>1,777</b>	<b>4,032</b>
Accessory Dwelling Unit Production	80	137	96	7	320
<b>Total Sites Available</b>	<b>1,121</b>	<b>619</b>	<b>828</b>	<b>1,784</b>	<b>4,352</b>
<b>Sites Surplus</b>	<b>+54</b>	<b>+15</b>	<b>+151</b>	<b>+196</b>	<b>+416</b>
Note: *Extremely Low Income is calculated as 50% of the City’s Very Low Income RHNA need.					

## 4. Development of Non-Vacant Sites and Converting to Residential Uses

The City has designated primarily non-vacant sites to meet their lower income 6<sup>th</sup> Cycle RHNA need, as well as a portion of the moderate and above moderate need. The City is reliant on infill development on non-vacant parcels to meet its RHNA need. Parcels designated to meet the two remaining categories (very low and low-income) are on mixed-use zoned parcels within the UMU zone. These parcels have a mixture of existing uses, which are described in detail in **Appendix B**.



State law requires that the City analyze:

- the extent to which existing uses may constitute an impediment to the future residential development within the planning period,
- the City’s past experience with converting existing uses to higher density residential uses,
- current market demand for the existing use,
- analysis of leases that would prevent redevelopment of the site,
- development trends,
- market conditions, and
- regulations or incentives to encourage redevelopment.

Past Experience Developing Non-Vacant Sites for Residential Uses

The following approved projects illustrate the viability of developing non-vacant, non-residentially zoned sites within Orange. These projects are all zoned Urban Mixed Use (UMU) consistent with the projects identified within the City’s sites analysis to meet the lower income RHNA need. The UMU zone is intended to promote an urban, high-intensity mixed-use area with integrated commercial retail/office, high-density housing, and civic uses. This zone permits residential development at up to 60 dwelling units per acre, though the City has assumed development at 50 dwelling units per acre for the analysis.

The projects below were developed with a mixture of uses and the square footage of non-residential uses has been provided where available.

<b>Project Address/ APN</b>	<b>Dwelling Units</b>	<b>Zoning</b>	<b>Use Prior to Redevelopment</b>	<b>Project Analysis</b>
3537 The City Way/ 23106137	334	UMU	Surface parking lot for medical, hotel and office buildings.	AMLI Apartments. 4-story wrap apartment project developed at 60 du/ac. The project was completed in 2017 and achieved the maximum density. Developed directly adjacent to the Outlets at Orange
1110 Town and Country Road/ 39062102	260	UMU	Vacant lot adjacent to an existing office tower (underdeveloped office tower Phase II)	Eleven10 Apartments. 5-story podium apartment project developed at 60 du/ac. Project site is adjacent to existing office and commercial uses. The project was completed in 2018 and achieved the maximum density. The project was developed as horizontal mixed-use with existing office uses.
1055 Town and Country Road/ 04121405	262	UMU	Surface parking lot for existing office building.	Cameo Apartments. 5-story apartment project developed at 44 du/ac. Recently completed in 2020. The project was developed as horizontal mixed-use with existing office uses.
1725 W. Katella/ 27530106	94	UMU	Low-rise light industrial/office	Branch West (aka Garrison Apartments). Apartment building is a podium product involving a development agreement to



<b>Project Address/ APN</b>	<b>Dwelling Units</b>	<b>Zoning</b>	<b>Use Prior to Redevelopment</b>	<b>Project Analysis</b>
			building with surface parking lot	allow a transfer of development rights from an adjacent City water well site to exceed the General Plan’s maximum 60 du/acre density. Final certificate of occupancy pending.
702-1078 Town and Country Road/ 04121305	709 (635 Apartments & 74 Townhomes)	UMU	Low-rise office park with surface parking lot	Fairfield Apartments and Tri-Point Townhomes. Developed at 60 du/ac. Apartments are developed in two separate buildings; one with 295 units and the other with 358 units. Both apartment buildings wrap multi-level parking structures. The project is currently under construction.

These projects demonstrate that there is a recent history of successfully developing residential units within the Urban Mixed Use zones in Orange. Three of the five projects shown developed at the maximum density permitted of 60 dwelling units per acre while one developed above that density at 85 du/ac. While these horizontal mixed use projects were originally proposed at densities lower than permitted, the City averages the density over the entire horizontal mixed use site in order to accommodate the residential infill. Additionally, the City requires access easements for parking and emergency access in perpetuity in order to justify the properties as integrated mixed use sites. Based on the size of the parcel that is created for the residential component of these projects, all mixed use projects exceed the allowable density. The remaining project developed under the maximum density at 44 dwelling units per acre due to retaining existing office uses onsite. A workforce housing study determined that all of the sample projects shown in **Table 3-18** were affordable at the moderate income level.

To accommodate the potential for a lower number of residential units due to a mixture of uses onsite, the City has made assumptions within the sites analysis which base development production on a 48 dwelling units per acre density as described previously in this appendix. This is a conservative estimate as the examples show that most projects developed in the UMU zone do so at or above the maximum density due to the City’s actions to address development constraints. The **Housing Plan** section outlines actions the City will take to promote the development of affordable units within the mixed used areas.

Existing Uses on Candidate Sites

**Table B-3** shows the existing uses on each of the candidate sites identified to meet Orange’s low and very-low income RHNA need. These sites range from commercial and office to underutilized surface parking lots. Where it is known that there are either temporarily or permanently closed or actively for lease/sale sites, this has been indicated within the individual parcel analysis.

The City is continuing to outreach to property owners of the identified candidate sites and the development community to collect letters of interest in residential development. Letters received are included within **Appendix A**.



### Lease Analysis

Existing lease agreements on infill and non-vacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the City to consider lease terms in evaluating the use of non-vacant sites, however the City does not have access to private party lease agreements or other contractual agreements amongst private parties. As part of the sites analysis for very-low and low-income sites, the City notified property owners whose properties were identified as part of the sites analysis. As the City is not proposing to rezone or change the zoning on properties, this notification was purely informative to let property owners know why their parcel was identified and gather feedback.

### Regulatory Incentives

The City of Orange does not currently have any regulatory incentives aimed at the development of lower income housing. Density bonus is a Statewide program which provides concessions to developers who propose a certain percentage of affordable units as part of their project. By right, developers who meet any level of density bonus requirements are permitted additional density and a lowered parking ratio. Additional concessions may be available depending on the type of project, such as lowered requirements for certain development standards such as FAR, open space, or others.

The City has created **Programs 2B and 2G** which are written to address actions the City will take which may promote development of affordable housing.

### Current Market Demand for Existing Uses

The areas within Orange identified as the most likely to redevelop at densities suitable for lower income housing are primarily in areas with existing commercial and office uses. Due to the pandemic, these markets have seen a large decrease in demand as companies shrink their physical footprint, introduce flexibility to workers through work from home options, or hasten the transition to a focus on virtual sales.

A November 2020 report by HughesMarino<sup>3</sup> on the Orange County commercial real estate market and the impacts of COVID-19 showed a 34 percent increase in sublease office space from a year ago. Sublease inventory occurs at cheaper rents and shorter terms than typical leases and indicates a hesitancy on the part of office space users. The report goes on to say that “many office tenants that have had leases expire since the pandemic started have not renewed their leases and have elected to operate until post-COVID without any office space, essentially foregoing having any significant office space until they can reassess their needs in the post pandemic reality. Further, many office tenants with lease expirations in the next six months are also choosing not to renew their lease for the same reason. This is more common for smaller companies with 50 or fewer employees that are working fully remote and have determined that eliminating the expense of office space is to their benefit. This has caused an uptick in Orange County office space availability, where the availability of office space in the county has gone up from

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<sup>3</sup> <https://hughesmarino.com/orange-county/blog/2020/11/10/who-is-hurting-who-is-thriving-in-orange-county-commercial-real-estate/>



approximately 17.6M square feet last year to about 24M square feet today—a 36 percent increase.” This trend is reflected throughout southern California with many employers having developed the infrastructure to work primarily remotely.

Additionally, the 2021 Emerging Trends in Real Estate Report<sup>4</sup>, prepared by PwC and the Urban Land Institute (ULI), discusses the decline in demand for retail space that has been occurring far before COVID-19 hit. The report sites greater debt among millennials and Gen X along with a shift to online sales. Further, the report states that “retailers announced more than 5,800 closures in 2018, jumping to over 9,300 in 2019. Rising retail bankruptcies account for only part of the story. Of greater importance, retail chains are downsizing their store counts and closing underperforming stores...” This all points to a need to diversify traditionally retail corridors and other areas by bringing in new users who can help to revitalize retail uses.

### Development Trends

In addition to commercial office and smaller retail centers, the City has identified sites in and around The Outlets at Orange property, which is zoned UMU and permits residential development, as sites with the potential to redevelop for residential uses.

The Outlets at Orange located in the Uptown Orange area of the city is a 57 acre outdoor mall with approximately 860,000 square feet of commercial uses, including restaurants, shops and entertainment uses surrounded by concentrated medical and office activity. As the dynamic of retail changes, there is a push towards creating lifestyle centers with a mixture of using, including higher density residential uses to draw in more potential buyers and locate them on-site. While the Outlets is a well-performing retail center, in recent years multi-family residential projects have been constructed or entitled on surrounding infill sites, incrementally having the resulting effect of a horizontal mixed-use urban district.

The following regional malls within Orange County, which have similar development characteristics to the Outlets at Orange, have completed planning and entitlement efforts to permit residential uses.

- **MainPlace Mall, Santa Ana, CA** – In 2019, MainPlace Mall completed a Specific Plan which permits the development of up to 1,900 residential units at densities up to 90 dwelling units per acre. Anticipated development also includes up to 400 hotel rooms, a total of 1,400,000 square feet of commercial uses, and up to 750,00 square feet of office space. MainPlace Mall is smaller than the Outlets at Orange at approximately 49 acres. The two malls are roughly 1.5 miles apart in adjacent cities. These malls share the following characteristics:
  - Location and local/regional context. The two malls are roughly 1.5 miles apart. Both malls serve a market area that is close to freeways for regional access and provide needed housing at an easily accessible location.

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<sup>4</sup> <https://www.pwc.com/us/en/asset-management/real-estate/assets/pwc-emerging-trends-in-real-estate-2021.pdf>



- Existing Character. MainPlace and The Outlets are both surrounded primarily by surface parking lots with opportunity for redevelopment.
- **Westminster Mall, Westminster, CA** – The City of Westminster is currently working with property owners on the Westminster Mall Specific Plan which is anticipated to provide guidelines for mixed commercial, professional office, hotel, and residential development (which would vary in housing type and affordability). A maximum of 3,000 dwelling units, 425 hotel rooms, 1.2 million square feet of non-residential uses (retail and office), and a maximum height of 10 stories are being analyzed as part of the project’s EIR.<sup>5</sup> These malls share the following characteristics:
  - Location/local market. Westminster Mall is located directly adjacent to I-405 and in close proximity to Beach Boulevard and a number of job-creating uses. Similarly, the Outlets at Orange are at the intersection of two major freeways (I-5 and SR-22) and in close proximity to job creating use corridors along Main Street and Chapman Avenue.
  - Character. Westminster Mall is surrounded by parking, most of which remains largely unused. This parking could be easily accommodated within a structure as is planned in the specific plan.
- **Village at Laguna Hills, Laguna Hills, CA** – In 2016, Laguna Hills Mall began a transformation to add approximately 1,500 residential units, 150 hotel rooms, and 465,000 square feet of office to the existing mall. A portion of the units have been constructed to date. These malls share the following characteristics:
  - Character. Similar to the Outlets, Laguna Hills Mall is a partially outdoor mall/lifestyle center with parking completely surrounding commercial uses. Both malls are directly adjacent to large job creating uses in the form of major medical centers.
  - Location. Laguna Hills Mall is directly adjacent to the I-5 freeway and regionally serving. Similarly, the Outlets at Orange are at the intersection of two major freeways (I-5 and SR-22).

Multi-family housing development that has occurred on parking lot sites within the City of Orange has been successful, including multiple apartment buildings directly west of the Outlets. While there were three infill housing projects approved in the vicinity of the Outlets, also infill on surface parking lots, it is the City’s understanding that the projects did not move forward due to economic uncertainties due to the pandemic. The City is optimistic that these projects will come back in some form in the future. The mall ownership has also indicated that it is contemplating future housing integration into its site as the housing the did get built has proven to be a positive addition to their patron mix. The Outlets property remains an ideal location for future housing opportunities as malls become mixed-use, walkable lifestyle centers with a focus on the synergy between residential, commercial, and office uses.

#### **ACCESSORY DWELLING UNIT PRODUCTION**

One of the proposed methods for meeting the City’s moderate and above moderate RHNA is through the promotion and development of ADUs. A number of State Assembly and Senate Bills were passed in 2019 and 2020 that promote and remove barriers that may inhibit the development of ADUs within

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<sup>5</sup> <https://www.westminster-ca.gov/Home/ShowDocument?id=1568>



communities. These bills, as well as other significant legislation relating to ADUs creates a development environment that is likely to increase the number of ADUs developed within Orange over the 2021-2029 planning period. Orange, with a large proportion of single-family residential properties (many on larger lots), is well-oriented for the development of ADUs.

The City saw an increase in ADU approvals in 2020. The City had 27 ADUs approved for development between January 1, 2020 and December 31, 2020, an 170 percent increase from the 10 ADUs the City permitted in 2019. HCD guidance states that ADUs may be calculated based on the City's production since January 1, 2018. In 2018 and 2019, the City of Orange approved 15 and 10 ADUs respectively. The City of Orange has determined based on past performance and HCDs approved methodology that it is appropriate to anticipate the development of 40 accessory dwelling units per year from 2021 to 2029 for a total of 320 ADUs.

## F. Financial Resources

Providing an adequate supply of decent and affordable housing requires funding from various sources, the City has access to the following finding sources.

### 1. Section 8 Housing Choice Voucher

The Section 8 Housing Choice Voucher program is a Federal government program to assist very low-income families, the elderly, and the disabled with rent subsidy payments in privately owned rental housing units. Section 8 participants are able to choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. They typically pay 30 to 40 percent of their income for rent and utilities. The Orange County Housing Authority currently administers Section 8 Housing Choice vouchers within the City of Orange. The City's goal is to assist 483 households each year.

### 2. Community Development Block Grants (CDBG)

The Community Development Block Grant (CDBG) program provides annual grants on a formula basis to cities to develop viable urban communities by providing a suitable living environments and by expanding economic opportunities, principally for low- and moderate-income persons (up to 80 percent AMI).

CDBG funds can be used for a wide array of activities, including:

- Housing rehabilitation;
- Lead-based paint screening and abatement;
- Acquisition of buildings and land;
- Construction or rehabilitation of public facilities and infrastructure, and;
- Public services for low income households and those with special needs.



### 3. HOME Investment Partnership Program (HOME)

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80 percent of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership by low income households.

The City of Orange receives HOME funds from HUD annually. The City qualifies as an entitlement jurisdiction and the Community Development Department serves as the grantee to administer CDBG and HOME funds in accordance with the pertaining statutory and regulatory requirements. **Table 3-19** below identifies the funding allocated to different services and persons assisted, based on the City’s 2015-20 Consolidated Plan. Additionally the City is utilizing HOME funds to assist in development of the Corp Yard Housing Project.

<b>2015-2020 Goal Name and Category</b>	<b>CDBG and HOME Funds</b>	<b>Goals (Persons Assisted)</b>	<b>2015-2018 Accomplishments</b>
Affordable Housing	\$1.5 million	1,800	1,349
Homeless	\$61,000	30	12
Public Facilities	\$4.1 million	57,870	12,651
Public Services	\$845,000	231,800	230,698

### G. Energy Conservation

The primary uses of energy in urban areas are for transportation lighting, water heating, and space heating and cooling. The high cost of energy demands that efforts be taken to reduce or minimize the overall level of urban energy consumption. Energy conservation is important in preserving non-renewable fuels to ensure that these resources are available for use by future generations. There are also a number of benefits associated with energy conservation including improved air quality and lower energy costs.

The City of Orange is collaborating with Southern California Edison and SoCalGas through the North Orange County Cities Energy Partnership (NOCC) to help the City achieve its energy reductions goals.



# Affirmatively Furthering Fair Housing (AFFH)

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## H. Affirmatively Furthering Fair Housing

All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of July 16, 2015.

Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The Draft Regional Analysis of Impediments (AI) to Fair Housing Choice for FY 2020-25 was made available for public review and finalized on May 5, 2020. The Fair Housing Council of Orange County works under the direction of a volunteer board of directors and staff to fulfill a mission of protecting the quality of life in Orange County by ensuring equal access to housing opportunities, fostering diversity and preserving dignity and human rights. The agency is a HUD Approved Housing Counseling Agency and provides one-on-one education, mediation, and counseling for individuals and families throughout the Orange County region.

The AI identifies impediments that may prevent equal housing access and develops solutions to mitigate or remove such impediments. Orange’s 6th Cycle Housing Element references analysis from the regional FY 2020-2025 AI in order to identify potential impediments to housing that are specific to Orange. The City also completed its FY 2020-24 Consolidated Plan, as an entitlement city for Community Development Block Grant (CDBG) funding, which identifies housing problems within the community, specifically among low and very-low income households. Fair housing is identified as a priority within the Consolidated Plan.

## I. Needs Assessment

The AI contains a Countywide analysis of demographic, housing, and specifically fair housing issues for all of the cities in Orange County, including Orange. The City's demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations were discussed in the previous **Section 2: Community Profile**.

### 1. Fair Housing Issues

As a part of the development of the FY 2020-25 AI and in order to ensure that the analysis accurately reflected the conditions in the community, extensive outreach and testing was done, including interviews, community meetings, focus groups and workshops and public hearings. In order to gather input and participation, the County reached out to tenants, landlords, homeowners, fair housing organizations, civil



rights and advocacy organizations, legal services providers, social services providers, housing developers, and industry groups to hear directly about fair housing issues affecting residents of Orange County.

Public hearings and City Council meetings were held throughout the County during the Spring. Due to the prohibition of gatherings because of COVID-19, hearings and meetings were held remotely. All community meetings had translation services available if requested in Spanish and Vietnamese. Public hearings and City Council meetings were held throughout the County during the Spring. Due to the prohibition of gatherings due to COVID, hearings and meetings were held remotely.

The City does not regularly conduct fair housing testing; however the regional AI identified the following fair housing issues in the City:

- **Educational Opportunities:** The City of Orange struggled with educational opportunity, all with scores in the 30s to 40s on a scale of 100 for the composite education index, signifying low opportunity and resources. This analysis is explained in more detail in this section relating to disparities in access to opportunity.
- **Environmental Opportunities:** Orange City is one of the least environmentally healthy, with index scores in the 20s on a scale of 100 for the environmental opportunity index, signifying low opportunity and resources.
- **Economic Opportunities:** The City of Orange has relatively large disparities by protected class groups, where Hispanic residents have significantly lower access to economic opportunity (economic access includes job access and opportunity, and other economic upward mobility opportunities) than other racial/ethnic groups.
- **Regional Opportunity, Place:** The City of Orange has two of census tracts which have low resources and access to opportunities for upward mobility of residents. Specifically, these areas have low opportunity for housing and civic life resources. These census tracts do not provide appropriate or sufficient housing access for current residents and therefore create fair housing barriers.

## 2. Fair Housing Enforcement and Outreach Capacity

### City of Orange

Currently, the Fair Housing Foundation (FHF) provides fair housing services to the City of Orange. This includes offering fair housing counseling and landlord/tenant mediation services which are available for tenants, realtors, apartment owners and managers, lending institutions and other interested parties. Specifically, the FHF promotes services and educational activities via social media, twitter, Instagram, Facebook, and online. FHF uses USPS Door-to-Door service to reach the community directly. Through the USPS website they are able search for neighborhoods/zip codes, filters target customers by specific demographics such as age, household size, and income, etc. FHF targets lower income areas, and the Postal Service carrier delivers FHF information mailers to every address while delivering the day's mail. Additionally, the FHF mails flyers to local public departments such as library, city hall, and community organizations they have built relationships with. The City of Orange annually allocates \$24,522 in CDBG



funds for the Fair Housing Foundation in an effort to assist an estimated 150 families and to perform the following services, at no cost:

- Responding to discrimination inquiries and complaints, documenting and investigating discrimination complaints, and resolving or mediating discrimination complaints
- A comprehensive, extensive and viable education and outreach program, including:
  - Fair Housing Workshop
  - Certificate Management Training
  - Walk-In Clinics
  - Rental Housing Counseling Workshop
  - Community presentations, staff training, and workshops
  - Community events, booths, networking, etc.
- Landlord and tenant counseling on responsibilities and rights
- Rental counseling

In FY 2019 the Fair Housing Foundation provided services to 161 residents of the City of Orange. The Fair Housing Foundations offers regular walk-in counseling sessions, in addition to resources fairs, informational workshops (accessible in multiple languages), landlord and tenant workshops, and other outreach efforts. The City has confirmed with the Fair Housing Foundation that there are no current lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights as of the adoption of this document. Furthermore, the City of Orange has no active cases relating to fair housing issues.

As part of the FY 2020-25 Consolidated Plan for Orange, the City has set an annual goal of assisting 150 families or households with fair housing issues, within the five-year period this equates to a goal of 750 families or households. Orange has also set a goal of retaining a Fair Housing provider to promote fair housing education and outreach within the community. HUD maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. In 2019, 16 fair housing complaints were filed involving housing discrimination in the City of Orange.

### Orange County

The Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, is under contract to the County to administer a wide variety of fair housing services to residents of Orange County. The FHCOC provides the following services to Orange County residents:

- Serving as a fair housing resource for the region, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification;
- Responding to all citizen complaints regarding violation of fair housing laws;
- Providing tenant-landlord counseling to all inquiring citizens;
- Promoting community awareness of tenant-landlord rights and responsibilities;
- Reporting monthly on complaint processing;
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers;



- Increasing the supply of affordable housing in high opportunity areas;
- Preventing displacement of low- and moderate-income residents, seniors, and people with disabilities;
- Increasing community integration for persons with disabilities;
- Ensuring equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness; and
- Expanding access to opportunities for protected classes.

During the 2015-2019 reporting period, the FHCOC staff regionally received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC held 32 training sessions for rental property owners/managers and also presented 16 fair housing seminars and 70 general fair housing workshops.

The FHCOC ensures that the City's fair housing practices are consistent with State law and that residents have the tools and resources they need to address fair housing issues appropriately. The City relies on the FHCOC to track, monitor, and investigate fair housing cases as well as hold training sessions for property owners/managers.

#### Housing Element Update Outreach

Additionally, as a part of the Housing Element update the City hosted a variety of workshops and other engagement opportunities to gather input on housing needs, challenges, opportunities, and other feedback regarding housing in Orange. The City's outreach strategies and summaries of all events and surveys is available for review in *Appendix C* of this Housing Element.

Throughout the outreach and engagement process the City identified the following key themes:

- Community participants are interested in mixed use opportunities in Orange.
- Community participants opined an overall lack of affordable housing options in the City.
- Community participants would like to see and have more housing information and educational resources about housing opportunities and programs.
- Community participants opined transit centers and mixed-use areas as having the most potential for new housing opportunities.
- Community participants opined a lack of information about housing resources and an overall lack of housing availability were primary concerns they would like the City to focus on mitigating.

The themes identified above informed the direction of the data analysis for the Housing Element, as well as areas of focus for the Fair Housing analysis and the development of the Housing Plan (*Section 4*).

### 3. Fair Housing Laws

[The following lists State and local fair housing laws and specifies how the City complies:](#)

#### State

- **California Fair Employment and Housing Act (FEHA):** The City continues to implement and update programs that promote fair and equal access to housing. The City continues to review standards



and requirements that may constrain equal access to housing and the development of affordable housing.

- **Government Code section 65008:** The City continues to implement programs that encourage affordable housing development. Policy Actions 2B, 2G, 2M, 4A, are programs in the City that comply with the State’s requirement for fair review of affordable housing development.
- **Government Code section 8899.50:** The City implements programs and actions in compliance with State law that affirmatively furthers fair housing. As detailed in in this Section 3, the City administers programs to promote equal housing access and affordable resources.
- **Government Code section 11135:** The City promotes state-funded programs, such as the First-Time Homebuyer Loan Program, on the City’s website and at the public counter. The City continues to implement and encourages programs that promote full and equal access to all programs and activities.
- **Density Bonus Law:** The City establishes regulations for implementing the City’s Density Bonus Ordinance. The City provides incentives to developers to produce affordable housing to very low-income households, low-income households, moderate-income households, senior citizens, transitional foster youth, disabled veterans, and persons experiencing homelessness, as well as for the development of childcare facilities. Section 3.B.2 details the City’s compliance with the State Density Bonus Law.
- **Housing Accountability Act:** The City implements programs such as fee incentives, funding, and review of zoning procedures to facilitate and encourage housing development.
- **No-Net-Loss law:** Section 4: Housing Plan, and Appendix B: Candidate Sites Analysis, details how the City maintains adequate sites to accommodate all income categories for RHNA.
- **Excessive Subdivision standards:** The City continues to update its zoning code, waive certain development fees, and offer incentive packages to facilitate housing development.
- **Limits on growth controls:** The City identifies sites by income category in Appendix B: Candidate Sites Analysis, to meet the City’s RHNA. None of the sites identified as part of the analysis have known constraints.
- **Housing Element Law:** The City identifies and includes an analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs.

#### Local

- **Local Ordinances:** The City has a number of local ordinances that establishes procedures for rezoning, development permit processing, affordable housing fees, and other programs that encourage fair housing practices.
- **Housing Plan Programs:** Section 4: Housing Plan details the City’s goals, policies, programs, and objectives. The City addresses the need for additional housing opportunities, remove constraints to affordable housing, improving the existing housing stock, and provide equal opportunities for current and future residents of Orange.



## J. Analysis of Federal, State, and Local Data and Local Knowledge

### 1. Integration and Segregation Patterns and Trends

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country.<sup>6</sup> Alternatively, when white residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

**Figure 3-1** shows the dissimilarity between each of the identified race and ethnic groups and Orange's White population. The higher scores indicate higher levels of segregation among those racial and ethnic groups. According to the data, there are highest dissimilarity rates among the Native Hawaiian and those who identified as Hispanic. Specifically, 45.8 percent of the Native Hawaiian population in Orange would need to move into predominantly White neighborhoods for perfect integration and 46.3 percent of persons who identified as Hispanic in Orange would need to move into predominantly White neighborhoods for perfect integration.

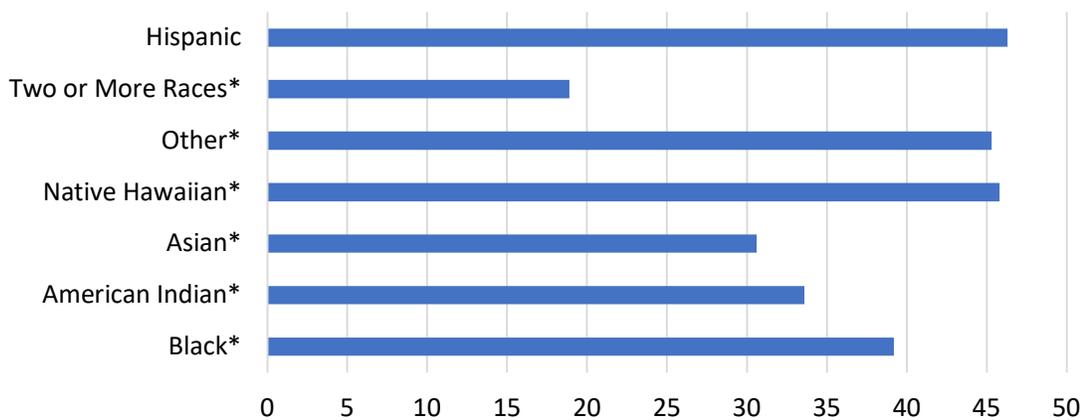
Additionally, **Figure 3-2** and **3-3** show the City's Diversity Index for 2010 and 2018. In 2010, the City had low diversity towards the center and in the eastern region. By 2018 diversity had increased throughout the City and predominantly in areas that previously had lower diversity. Areas of lower diversity still exist towards the City's eastern region and the center, but the City shows a diversifying trend.

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<sup>6</sup> Allen, James P. and Turner, Eugene. "Changing Faces, Changing Places: Mapping Southern California". California State University, Northridge, (2002).



**Figure 3-1: Dissimilarity Index with Whites – Orange**

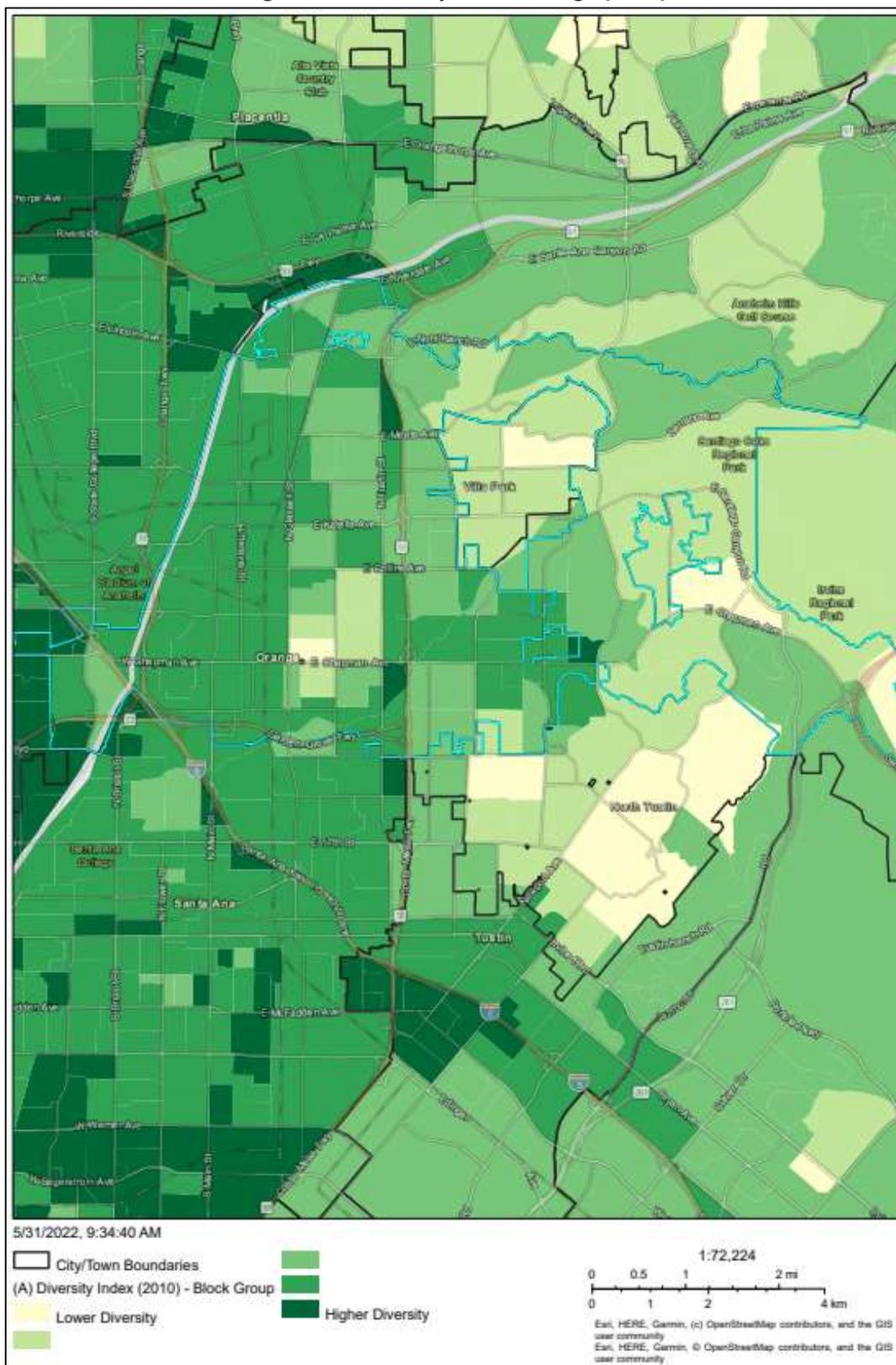


	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Two or More Races*	Hispanic
■ Dissimilarity Index with Whites	39.2	33.6	30.6	45.8	45.3	18.9	46.3

Source: Census Scope, Social Science Data Analysis Network, \*Not Hispanic or Latino



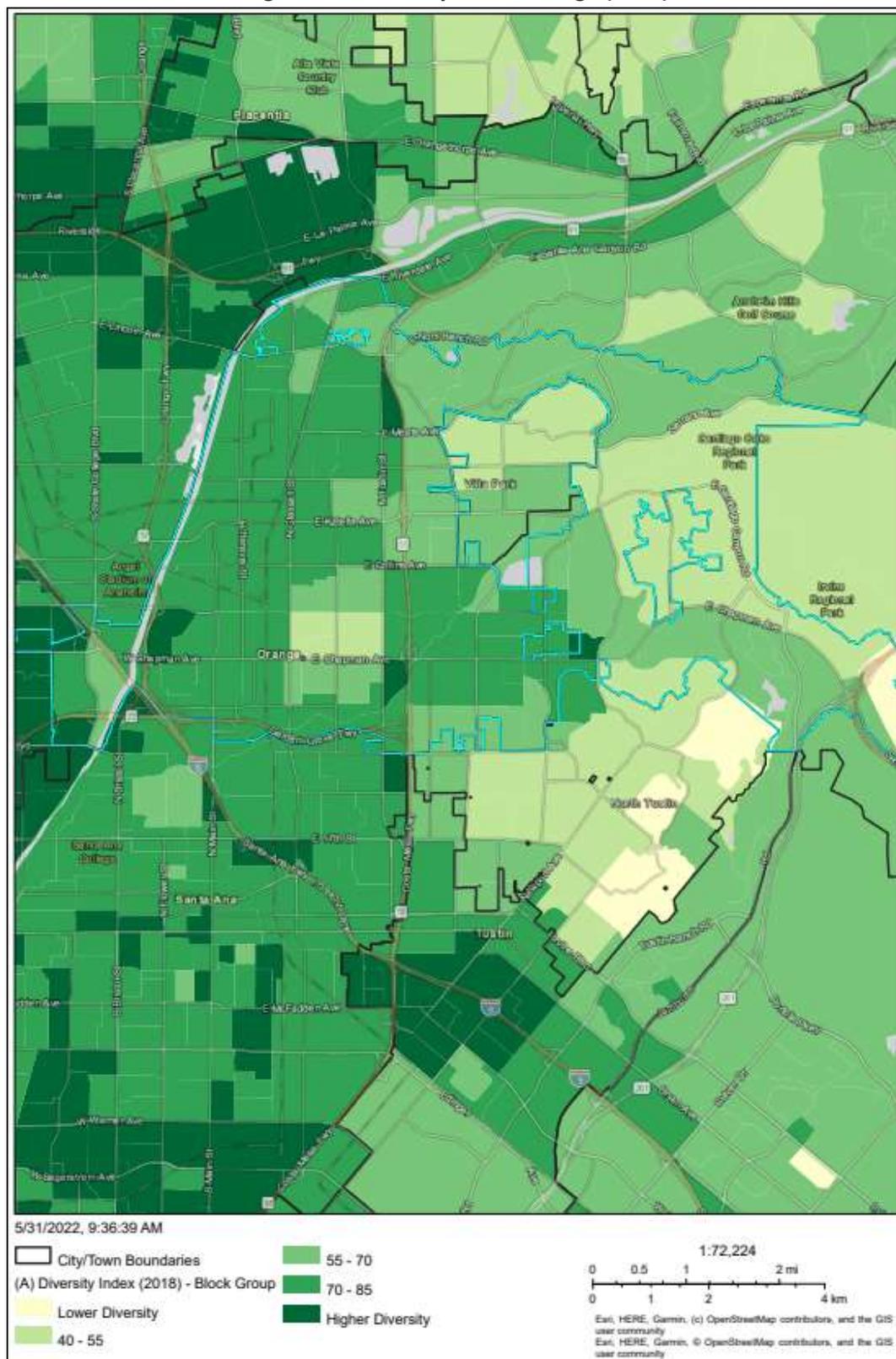
Figure 3-2: Diversity Index, Orange (2010)



Source: California Department of Housing and Community Development – AFFH Data Viewer



Figure 3-3: Diversity Index, Orange (2018)



Source: California Department of Housing and Community Development – AFFH Data Viewer



### *Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)*

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: RECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a RECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

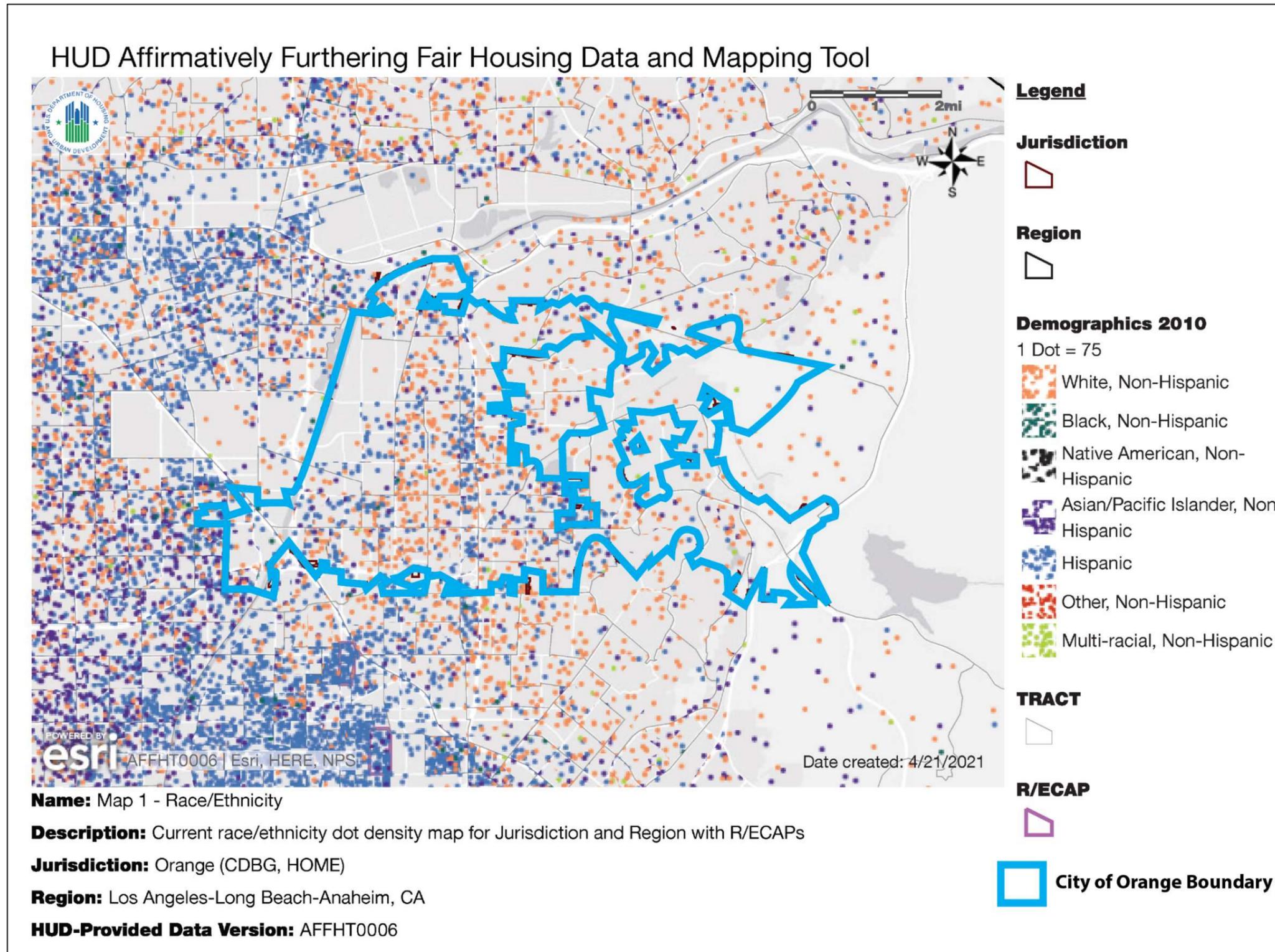
Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation.<sup>7</sup> However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks and communities to help immigrants preserve cultural identity and establish themselves in new places. Overall, it is important to study and identify these areas in order to understand patterns of segregation and poverty in a City. The 2020 AI performed an analysis of R/ECAPs within Orange County and found four R/ECAPs, none of which were found in Orange. **Figure 3-4** below displays the results of the analysis.

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<sup>7</sup> Orange County, Analysis of Impediments to Fair Housing Choice, April 2020 DRAFT.



Figure 3-4: Low Poverty Index with Race/Ethnicity and R/ECAPs, Orange



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, July 10, 2020



**Racially or Ethnically Concentrated Areas of Affluence (RCAA)**

The City has gathered demographic information regarding race/ethnicity concentration and income distribution in the City. The racial and ethnic makeup of the various neighborhoods are of critical importance in the formation of the City’s voting districts and the City has engaged a demographer to plot the racial and ethnic concentrations in the City based on the 2020 census. The 2020 census provides the most up to date statistics upon which to base the RCAA analysis. In addition, the 2012-2016 American Community Survey (ACS) provides additional data measured at the census tract level covering such areas as social characteristics, economic characteristics, and housing characteristics.

An RCAA has been variously defined as a census tract in which 80 to 90 percent or more of the population is White and has a median income of at least \$125,000. The nationwide RCAA analysis identifies the following:

- RCAA tracts have more than twice the median household income of the average tract in their metro area.
- Poverty rates in RCAAs are significantly lower and are, on average about 20 percent of a typical tract.
- RCAAs tracts are more income homogenous than a typical tract.
- The average RCAA is about 57 percent affluent.
- The typical RCAA tract has a rate of affluence 3.2 times that of a typical tract.

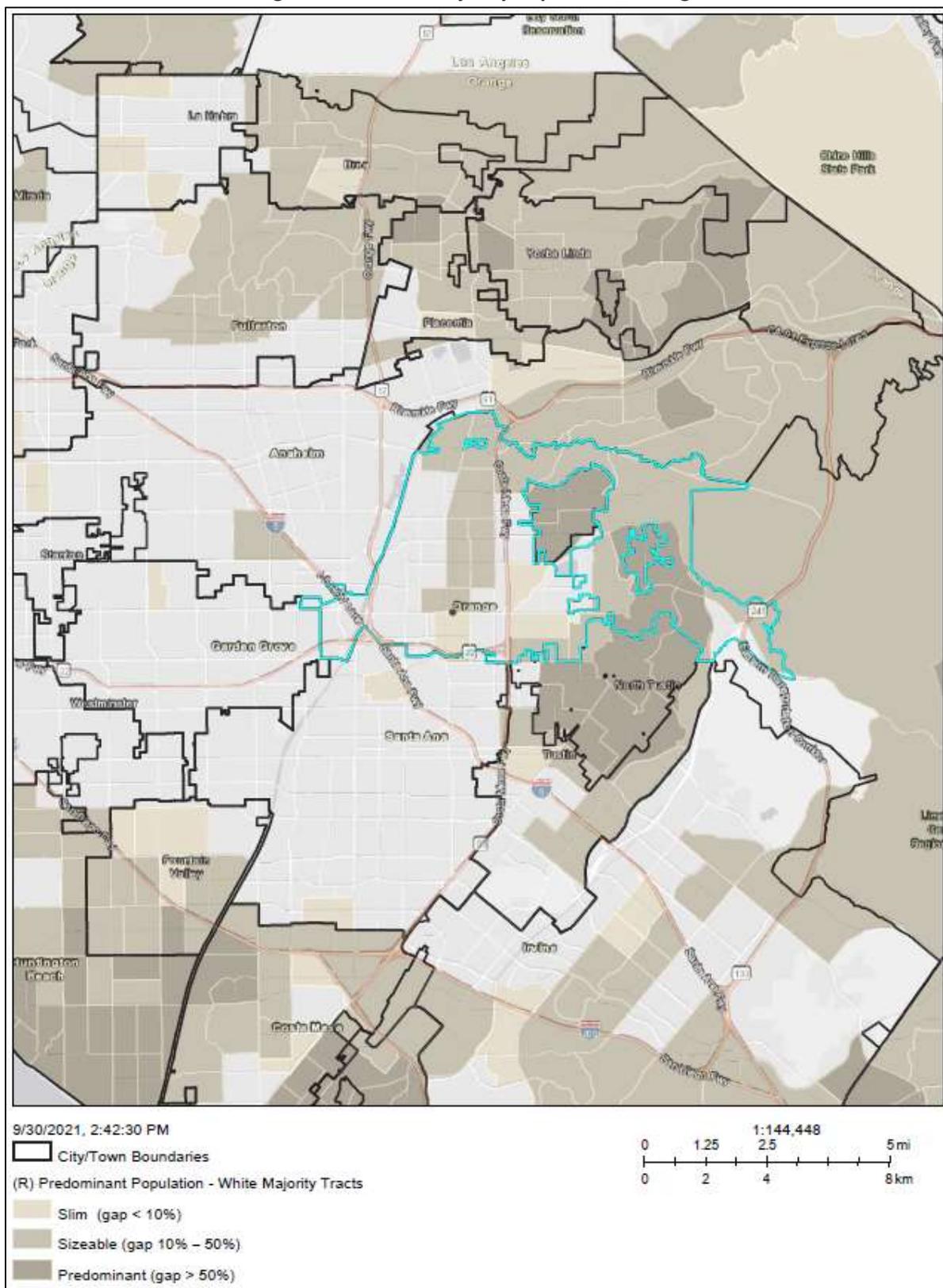
**Figure 3-5** shows census tracts with a majority White population. As the figure shows, the City has higher gaps between the White population and other Races on the east side. A number of census tracts report majority White populations between 67 and 77 percent. Most candidate housing sites identified as part of the Sites Analysis are located in areas without a gap between the Non-White and White populations.

**Figure 3-6** shows the breakdown on median income throughout the City. A number of census tracts in the eastern and southern region of the City report a median income greater than \$125,000. When overlaid with a majority White population, six block groups are identified as RCAAs. These are detailed in **Table 3-20**. No candidate housing sites are identified within RCAAs.

<b>Table 3-20: RCAAs by Block Group</b>		
<b>Block Group</b>	<b>Percent Population White</b>	<b>Median Income</b>
Block Group 3, Census Tract 219.17	77%	\$172,969
Block Group 2, Census Tract 219.17	77%	\$143,333
Block Group 2, Census Tract 756.05	67.7%	\$177,593
Block Group 5, Census Tract 756.05	67.7%	\$134,116
Block Group 4, Census Tract 756.04	74%	\$128,063
Block Group 5, Census Tract 756.04	74%	\$149,762
<b>Regional Context</b>		
Orange County	61%	\$90,234
<i>Source: California Department of Housing and Community Development – AFFH Data Viewer; American Community Survey, 5-Year Estimates, 2019</i>		



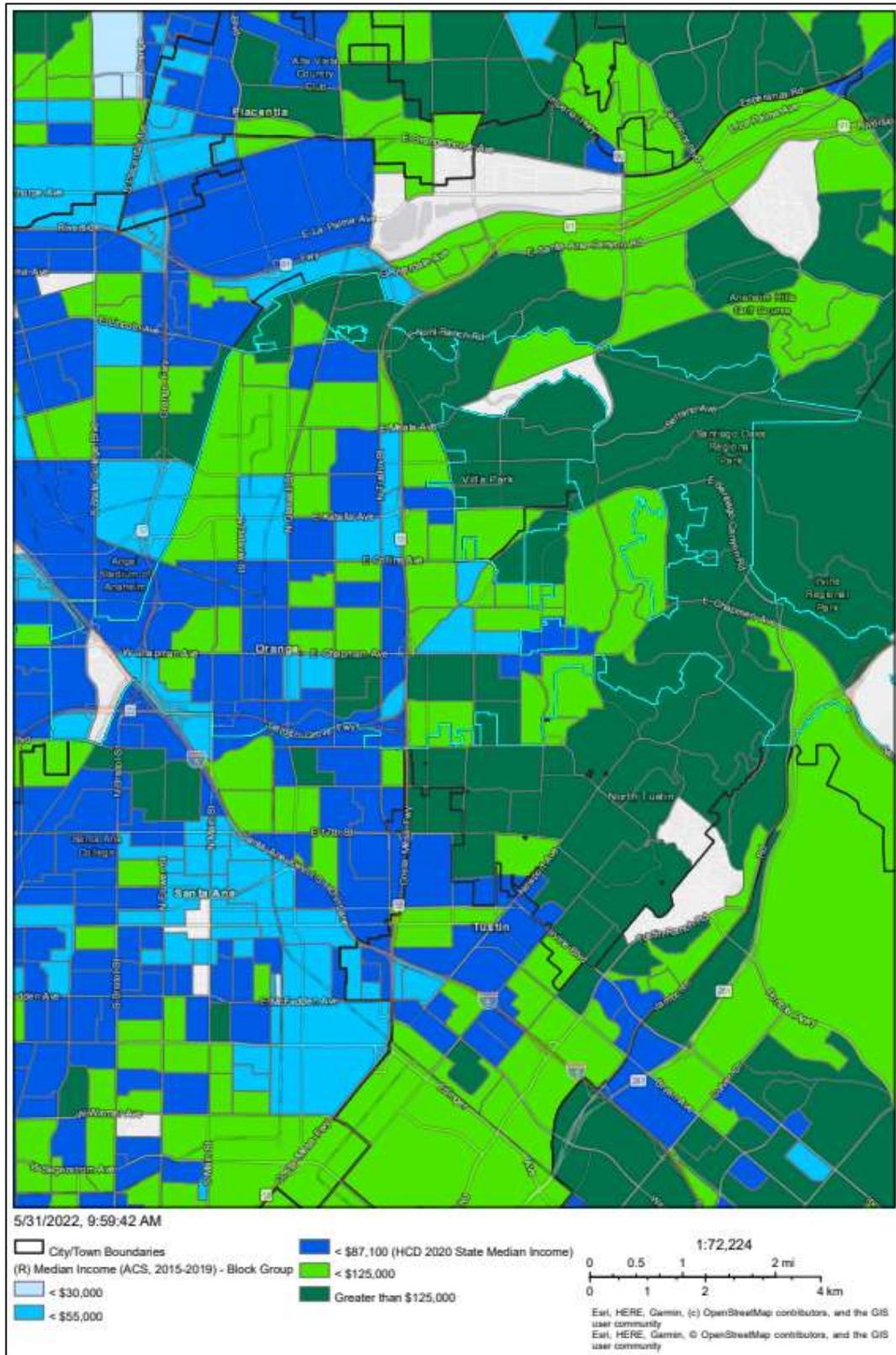
Figure 3-5: White Majority Population, Orange



Source: California Department of Housing and Community Development – AFFH Data Viewer



**Figure 3-6: Median Income by Block Group, Orange (2019)**



Source: California Department of Housing and Community Development – AFFH Data Viewer



Additionally, **Table 3-21** below shows local and regional context for the median household income of White households compared to all households.

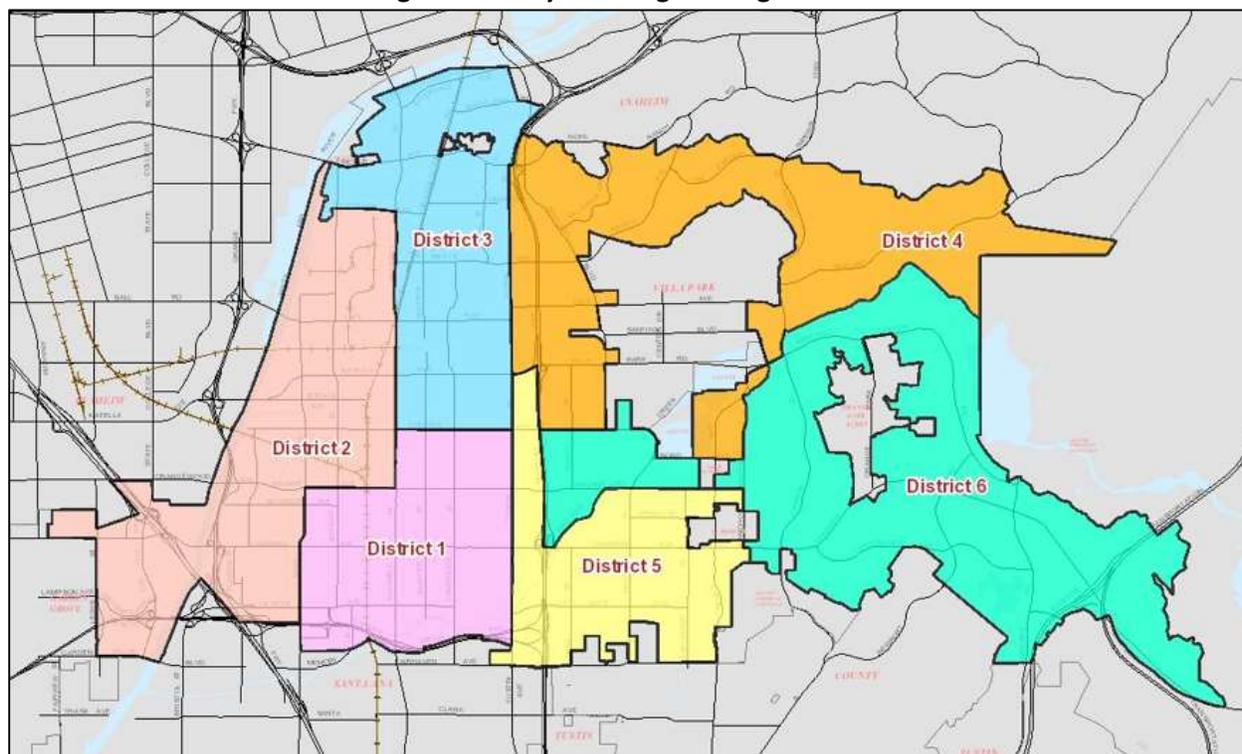
Race	Orange		Orange County	
	Median Income	Percent of Population	Median Income	Percent of Population
White	\$92,489 <sup>1</sup>	72%	\$94,082 <sup>1</sup>	61%
All Households	\$91,793	--	\$90,234	--

1. Median household income in the past 12 months (in 2019 inflation-adjusted dollars).  
*Source: American Community Survey, 5-Year Estimates, 2019.*

**Figure 3-7** shows the City’s current (as of February 2022) voting districts (1 through 6), formed in accordance with the California Voting Rights Act of 2001 (CVRA) and approved by the Orange County Superior Court. The CVRA does not take income levels into account in forming voting districts. As of the time of adoption of this Housing Element, the City is in the process of redrawing the six districts based on the results of the 2020 census.

**Table 3-22** shows the City’s current (as of February 2022) ethnic and income makeup in voting districts 1 through 6

**Figure 3-7: City of Orange Voting Districts**



*Source: City of Orange*

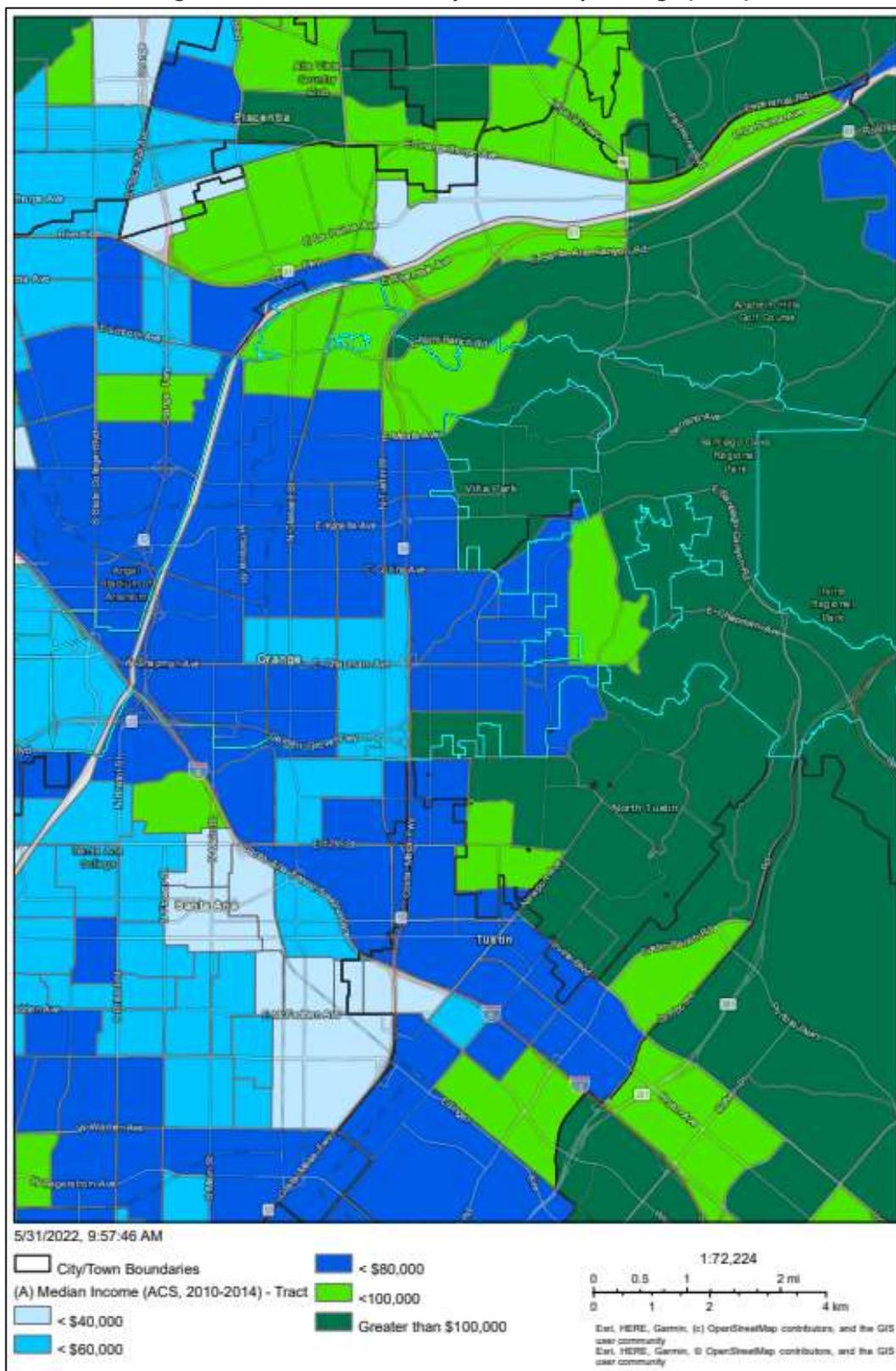


Table 3-22: City of Orange Demographics by Voting District							
	Total Population	Voting Districts					
		1	2	3	4	5	6
<b>Race and Ethnicity</b>							
White	55,395	12,177	5,458	9,704	10,381	6,421	11,263
Hispanic	57,728	9,274	13,816	8,843	6,448	13,377	5,970
Black	4,062	872	1,120	636	470	573	391
Asian	22,066	3,128	3,796	3,731	4,814	2,390	4,207
Native	4,505	877	945	681	573	889	540
Pacific Islander	988	231	181	161	127	158	130
Total	140,191	25,715	24,162	23,096	22,305	22,829	22,084
<b>Household Income</b>							
Up to \$25K	4,904	1,363	1,104	697	434	841	465
\$25K to \$50K	6,084	1,088	1,171	995	839	1,103	888
\$50K to \$75K	6,863	1,615	1,503	985	854	890	1,016
\$75K to \$200K	19,511	3,401	2,620	3,752	2,993	2,817	3,929
\$200K plus	5,858	687	313	934	1,704	739	1,480
Total	140,191	25,715	24,162	23,096	22,305	22,829	22,084
<i>Source: City of Orange</i>							

**Figure 3-8** shows the median income for the City of Orange by Block Group in 2014. Block groups towards the center of the City and to the south and east are shown to have incomes between \$80,000 and \$100,000. In comparison to 2019 (**Figure 3-6**), the City now has more areas of high incomes over \$125,000 and some patches of incomes between \$30,000 and \$55,000. The areas including lower incomes in 2019 are largely made up of industrial and commercial uses, and some residential neighborhoods. Overall, the City is showing trends of increased household incomes.



**Figure 3-8: Median Income by Block Group, Orange (2014)**



Source: California Department of Housing and Community Development – AFFH Data Viewer



## 2. Disparities in Access to Opportunity

### Regional Opportunity Index (ROI)

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) intended to help communities understand local social and economic opportunities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI incorporates both “people” and “place” components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity.”

“People” is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Education Opportunity:** Assesses people’s relative success in gaining educational assets, in the form of a higher education, elementary school achievement, and regular elementary school attendance.
- **Economic Opportunity:** Measures the relative economic well-being of the people in a community, in the form of employment and income level.
- **Housing Opportunity:** Measures the relative residential stability of a community, in the form of homeownership and housing costs.
- **Mobility/Transportation Opportunity:** Contains indicators that assess a community’s relative opportunities for overcoming rural isolation.
- **Health/Environment Opportunity:** Measures the relative health outcomes of the people within a community, in the form of infant and teen health and general health.
- **Civic Life Opportunity:** A relative social and political engagement of an area, in the form of households that speak English and voter turnout.

“Place” is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

- **Education Opportunity:** Assesses a census tract's relative ability to provide educational opportunity, in the form of high-quality schools that meet the basic educational and social needs of the population.
- **Economic Opportunity:** Measures the relative economic climate of a community, in the form of access to employment and business climate.
- **Housing Opportunity:** Measures relative availability of housing in a community, in the form of housing sufficiency and housing affordability.
- **Health/Environment Opportunity:** A relative measure of how well communities meet the health needs of their constituents, in the form of access to health care and other health-related environments.
- **Civic Life Opportunity:** Measures the relative social and political stability of an area, in the form of neighborhood stability (living in same residence for one year) and US citizenship

As shown in **Figures 3-6 and 3-7** below, the City is a mix of low and moderate resource to high resource depending on the census tract. **Figure 3-6** displays the data for level or range of assets a population has,



by census tract. The figure shows that while most people in Orange have high opportunity based on employment, economics, education, housing and civic life, there are four census tracts which show low opportunity. Census Tract A (762.04) shows high levels of access to mobility and transportation; however, it shows low civic life, health and environment, housing, economic and educational assets of this population. Census Tract B (761.01) also shows low civic life, low housing and moderately low educational assets; however, Census Tract B population has high health, high mobility, and economic assets. Census Tract C (759.02) shows similar stats with low civic life housing and educational assets of the population but higher health, mobility/transportation, and economic opportunities. Census Tract D (759.01) aligns with Census Tract A, its population has primarily high access to mobility and transportation options with low resources or assets for civic life health, housing, economics, and education.

**Figure 3-7** below displays the level or range of opportunity that a census track can provide the population. The figure shows that majority of the census tracts in the City are high or very high resources, with the exception of two census tracts which are considered low resources opportunity. Census Tract A shows that that area provides high economic or job opportunity and high educational opportunities, however this area shows low civic life, low health and environment and low housing opportunities or resources. Additionally, Census Tract C shows moderate economic or job opportunity and high educational resources and opportunity however, similar to Census Tract A it shows low resource and opportunities for civic life, health and environment and housing. Increasing housing opportunities in the City can supplement the areas where residents have access to transportation, economic opportunity and jobs, and education but no stable or affordable housing options. In doing so, increased housing creates a more balanced community with more asset and resource opportunity for residents.

In both **Figures 3-9** and **3-10**, Census Tract A has the lowest opportunity levels. In comparison to demographic data, the area reports the following information:

- 68.8 percent Hispanic population
- 20-30 percent population whose income in the past 12 months is below the poverty line
- 50-75 percent low to moderate income population
- Over 20 percent overcrowded households

As such, Housing Policy Action 4A is included in **Section 4: Housing Plan** to affirmatively further fair housing and improve access to resources and housing in Census Tract A and across the City. Additionally, a number of sites have been identified within this Census Tract as part of the candidate sites analysis due to availability of land and potential for future development. The development of new, affordable housing units in this area may help to provide accessible housing to the residents of the area without resulting in displacement. In addition, new development may also result in additional resources and community services to existing residents of the area – ultimately resulting in improved conditions and diversity.



Figure 3-9: Regional Opportunity Index: People, 2014

## Regional Opportunity Index: People, 2014

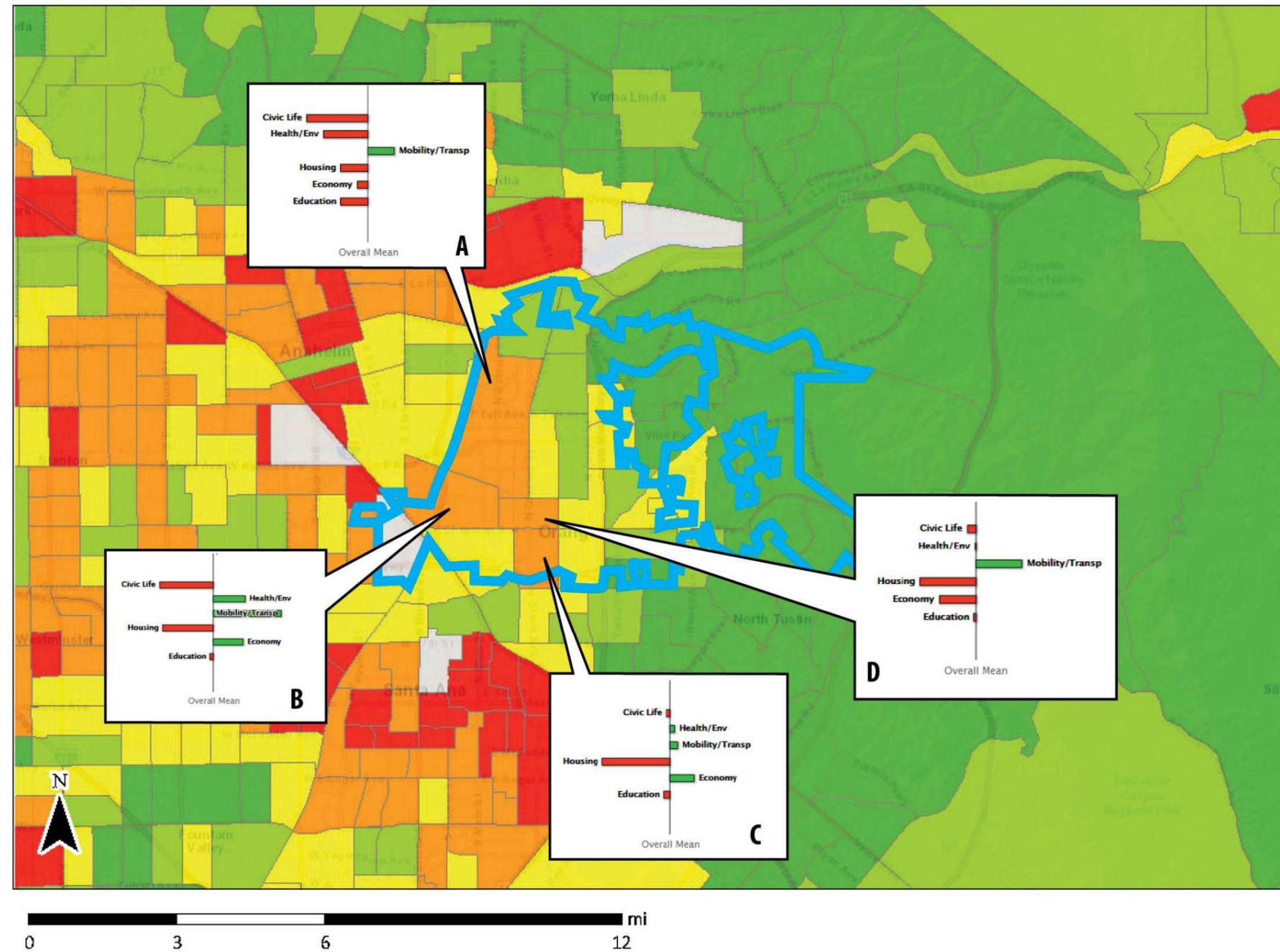
### Description

The Regional Opportunity Index (ROI): People is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

**Legend**

**Regional Opportunity Index: People**

- Some data not available
- Lowest Opportunity
- 
- 
- 
- Highest Opportunity
- City of Orange Boundary**



Date: 1/18/2021

<https://interact.regionalchange.ucdavis.edu/roi/>

Source: UC Davis Center for Regional Change and Rabobank, 2014.



Figure 3-10: Regional Opportunity Index: Place, 2014

## Regional Opportunity Index: Place, 2014

### Description

The Regional Opportunity Index (ROI): Place is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

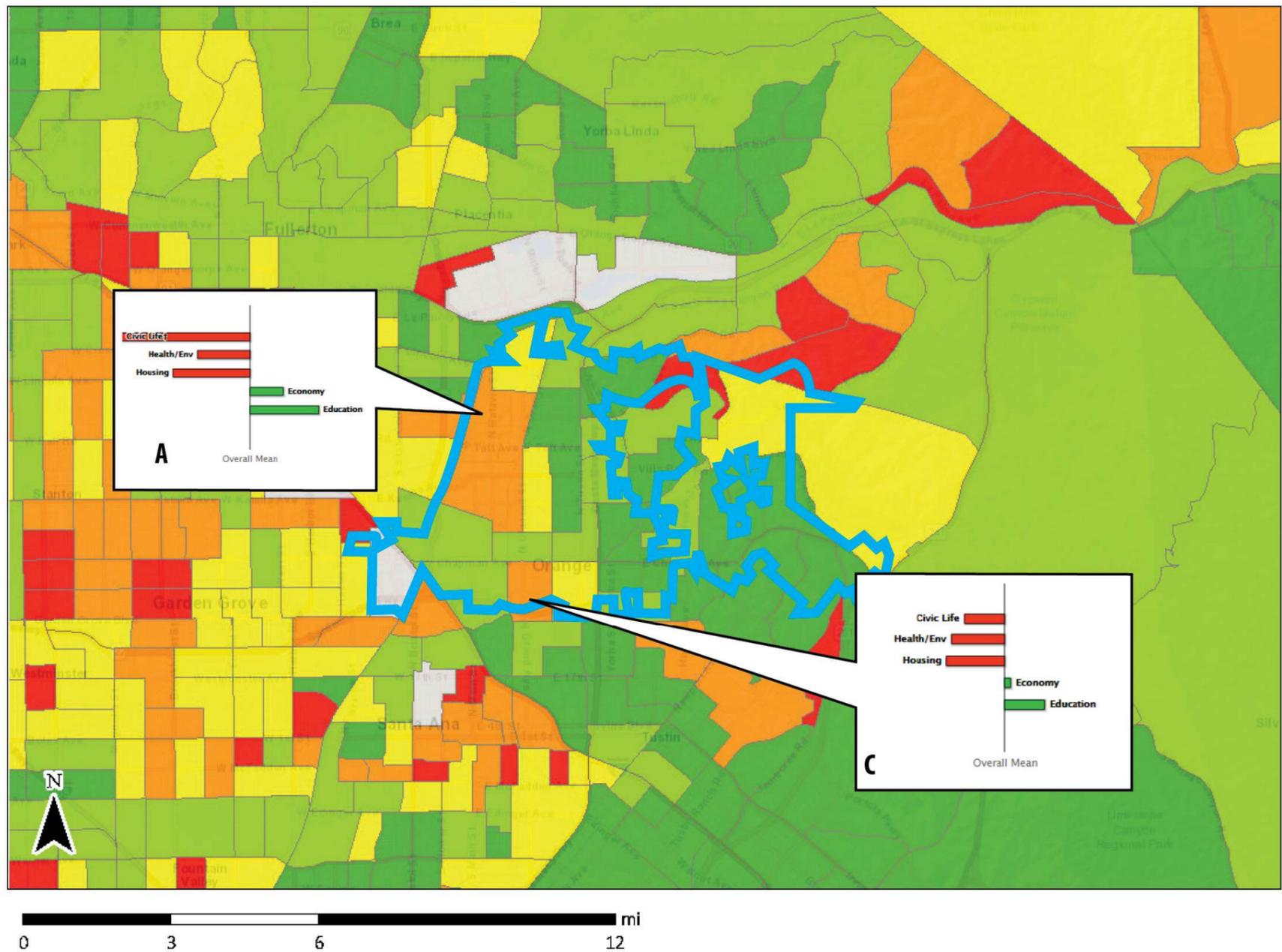
**Legend**

**Regional Opportunity Index: Place**

- Some data not available
- Lowest Opportunity
- 
- 
- 
- Highest Opportunity
- City of Orange Boundary

Date: 1/18/2021

<https://interact.regionalchange.ucdavis.edu/roi/>



Source: UC Davis Center for Regional Change and Rabobank, 2014.



Additionally, **Table 3-23** and **Figure 3-11** below display the data for Regional Opportunity Index for the City of Orange overall compared to the State of California. The data shows the following key findings:

- The City of Orange has a higher percentage of college educated adults age 25 or older, but a lower percentage of UC/CSU eligibility among high school graduates. High school graduation rates are higher in Orange, but the City has lower percentages of math and English proficiency. The elementary school truancy rate in Orange is 20 percent lower than that of the State.
- Economic opportunities are high in the City of Orange compared to the State. There are high employment rates with a higher minimum basic income. The City also has a high availability of quality jobs.
- Housing opportunities in Orange and the State are fairly similar – both have the same cost burden of 52%. Orange has a homeownership rate of 53%, and housing adequacy is rated slightly lower than the State at 89%.
- Orange residents have relatively high access to mobility with greater access to vehicles and internet, but they do have slightly longer commutes than residents across the State.
- Environmental and health indicators in the City of Orange are good. Infant health, prenatal care, and access to health care is rated higher than across the State, and teenage birth rates and years of life lost are lower in the City.
- The City has very similar rates of civic life participation as the State.



Table 3-23: Opportunity Indicators - Orange and California						
ROI Indicator		Orange	Villa Park	Anaheim	Santa Ana	California
Education	<b>People</b>					
	<u>College Educated Adults</u> – Percentage of adults (age 25 and over) who have completed a post-secondary certificate/degree.	<b>40%</b>	63%	29%	16%	38%
	<u>Math Proficiency</u> – Percentage of 4th graders who scored proficient or above on the English Language Arts portion of California’s Standardized Testing and Reporting (STAR) test.	<b>66%</b>	87%	69%	72%	70%
	<u>English Proficiency</u> – Percentage of 4th graders who scored proficient or above on the math portion of California’s Standardized Testing and Reporting (STAR) test.	<b>62%</b>	89%	60%	54%	65%
	<u>Elementary Truancy</u> – Percentage of students who have missed more than 30 minutes of instruction without an excuse at least three times during the school year.	<b>4%</b>	3%	16%	8%	24%
	<b>Place</b>					
	<u>High School Graduation Rate</u> – Percentage of 9th grade cohort that graduated from high school 4 years later.	<b>93%</b>	93%	86%	88%	83%
	<u>UC/CSU Eligibility</u> – Percentage of high school graduates who completed UC/CSU a-g course requirements.	<b>38%</b>	39%	38%	43%	41%
	<u>Teacher Experience</u> – Percentage of teachers at the three closest public elementary schools with more than 5 years of teaching experience and at least one year of education beyond a BA.	<b>52%</b>	61%	67%	54%	36%
	<u>High School Discipline Rate</u> – Percentage of high school students in the school district who were suspended or expelled.	<b>5%</b>	5%	4%	6%	6%
Economic	<b>People</b>					
	<u>Employment Rate</u> – Percentage of adults age 20-64 employed.	<b>91%</b>	90%	90%	91%	89%
	<u>Minimum Basic Income</u> – Percentage of people with income over 200% of the federal poverty level.	<b>69%</b>	90%	59%	46%	64%
	<b>Place</b>					
	<u>Job Availability</u> – Number of jobs per 1,000 people, within a 5-mile radius.	<b>1,014.28</b>	1086.14	787.52	1090.41	701.75
	<u>Job Quality</u> – Percentage of jobs that are in high-paying industries, within a 5-mile radius.	<b>41%</b>	41%	38%	45%	40%
<u>Job Growth</u> – Percentage 1-year change in the number of jobs, within a 5-mile radius.	<b>3%</b>	4%	2%	2%	3%	
<u>Bank Accessibility</u> – Number of banks and credit unions per 1000 people, within a 5-mile radius.	<b>0.21</b>	0.27	0.2	0.24	0.24	
Housing	<b>People</b>					
	<u>Home Ownership</u> – Percentage of housing units owned by their occupants.	<b>53%</b>	93%	47%	47%	55%
	<u>Housing Cost Burden</u> – Percentage of households paying less than 30% of household income on housing costs.	<b>52%</b>	63%	46%	45%	52%
	<b>Place</b>					
<u>Housing Adequacy</u> – Percentage of households with no more than 1 occupant per room.	<b>89%</b>	99%	81%	66%	91%	

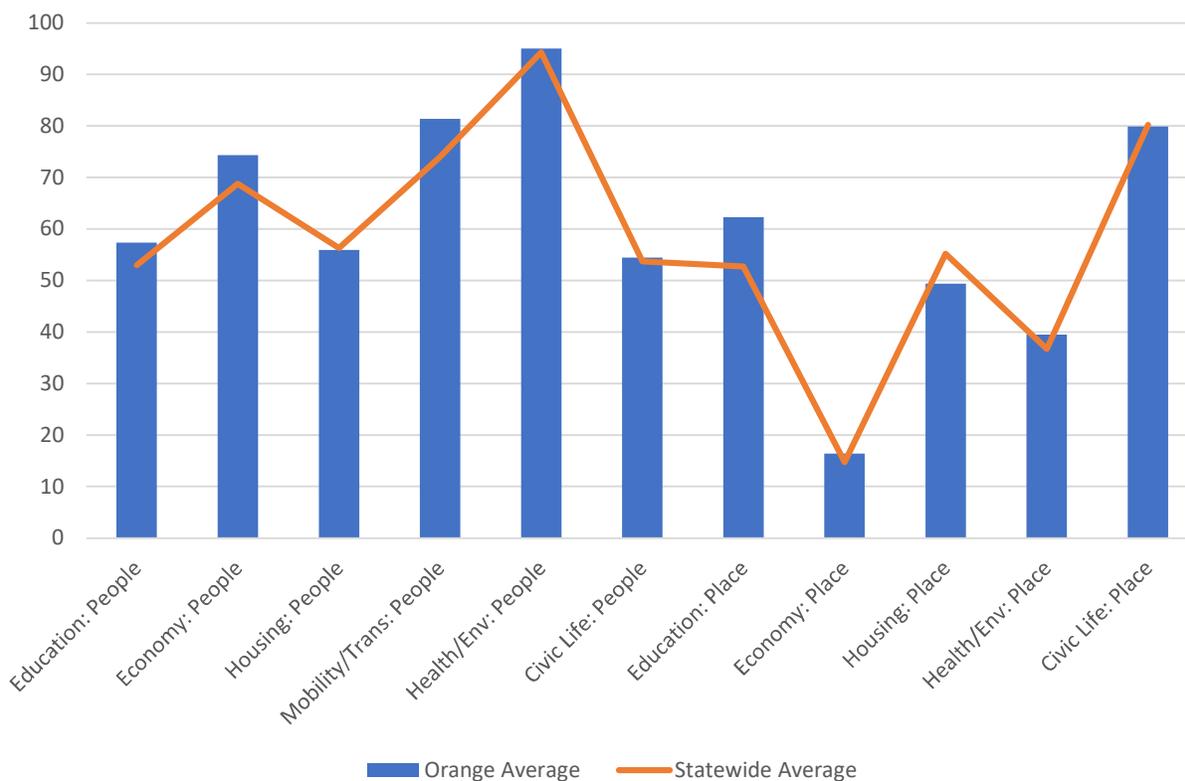


Table 3-23: Opportunity Indicators - Orange and California						
ROI Indicator		Orange	Villa Park	Anaheim	Santa Ana	California
	<u>Housing Affordability</u> – Ratio of median income of census tract to median value of dwellings in census tract.	<b>0.15</b>	0.16	0.15	0.19	0.19
Mobility	<b>People</b>					
	<u>Vehicle Availability</u> – Percentage of households with at least 1 vehicle, or 1 vehicle per worker.	<b>90%</b>	99%	85%	81%	86%
	<u>Commute Time</u> – Percentage of workers whose commute time is less than 30 minutes.	<b>65%</b>	68%	58%	65%	60%
	<u>Internet Access</u> – Number of households per 1,000 with high-speed internet.	<b>4.88</b>	5	4.42	4.17	4
Health/Environmental	<b>Place</b>					
	<u>Infant Health</u> – Percentage of births at or above healthy weight, or 2500 grams/5.5 pounds.	<b>96%</b>	98%	95%	95%	95%
	<u>Birth to Teens</u> – Percentage of all births to teens.	<b>6%</b>	0%	8%	11%	7%
	<u>Years of Life Lost</u> – Years of potential life lost.	<b>25.62</b>	20.35	26.38	26.29	29.84
	<b>Place</b>					
	<u>Air Quality</u> – Annual mean concentration of PM2.5.	<b>11.46</b>	11.72	11.77	10.49	10.01
	<u>Prenatal Care</u> – Percentage of mothers who received prenatal care in first trimester.	<b>90%</b>	90%	87%	86%	83%
	<u>Access to Supermarket</u> – Percentage who live within 0.5 miles (urban) or 10 miles (rural) of supermarket.	<b>43%</b>	20%	58%	75%	53%
	<u>Health Care Availability</u> – Number of providers of basic medical services per 1,000 population within 5 mile radius	<b>2.29</b>	2.96	1.58	2.49	1.76
	Civic Life	<b>People</b>				
<u>Voting Rates</u> – Percentage of citizen, voting age population that voted the 2010 general election.		<b>31%</b>	55%	25%	26%	31%
<u>English Speakers</u> – Percentage of population age 18-64 that speaks only English or speaks English "well" or "very well".		<b>88%</b>	95%	81%	66%	88%
<b>Place</b>						
<u>US Citizenship</u> – Percentage of adults who are U.S. citizens.		<b>82%</b>	96%	73%	58%	83%
	<u>Neighborhood Stability</u> – Percentage of citizens, over age 1, who live in the same residence as the previous year.	<b>84%</b>	90%	85%	88%	85%

Source: UC Davis Center for Regional Change and Rabobank, 2014.



**Figure 3-11: Regional Opportunity Index, Orange and California**



*Source: UC Davis Center for Regional Change and Rabobank, 2014.*

As Orange is considered a high opportunity region, the City is committed to implementing policies and programs to encourage new housing opportunities for existing and future residents. **Section 4: Housing Plan** identifies the strategies the City will explore in order to provide opportunity and housing for persons within the Orange/Orange County region.



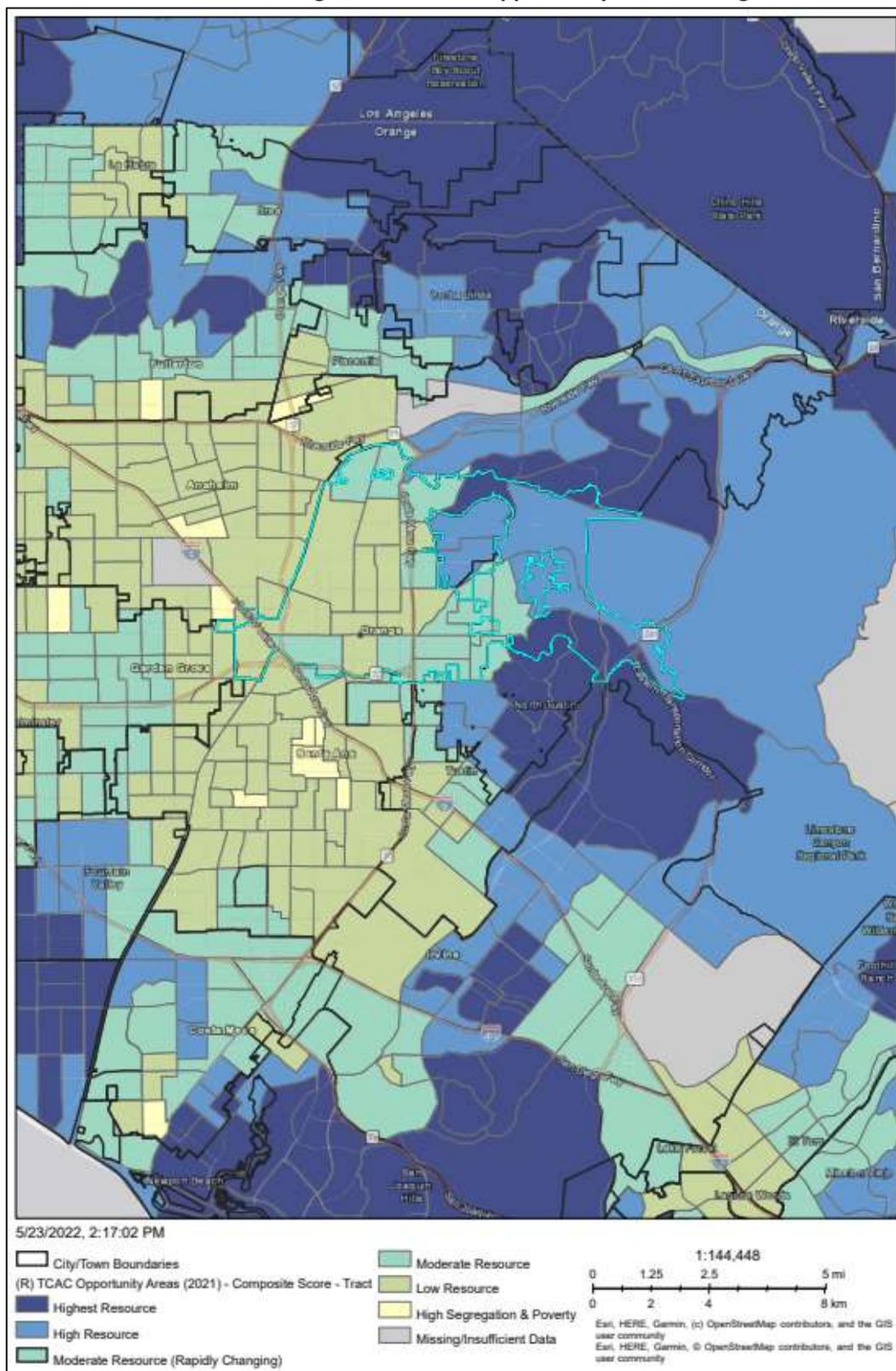
*California Tax Credit Allocation Committee (TCAC) Opportunity Area Map*

HCD together with the California Tax Credit Allocation Committee established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task force developed the TCAC/HCD opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force’s methodology, the tool allocates the 20 percent of the tracts in each region with the highest relative index scores to the “Highest Resource” designation and the next 20 percent to the “High Resource” designation. Each region then ends up with 40 percent of its total tracts as “Highest” or “High” resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. **Figure 3-12** below geographically displays data results for the City of Orange. Overall, the City is considered low to moderate resource, with the exception of some high resource areas to the southeast and northeast. The City’s west side is considered low resources, similar to surrounding jurisdictions such as Anaheim and Santa Ana. Given the extent of the City’s low and moderate resource areas, lower income and moderate income candidate housing sites have been identified in areas of low to moderate resources. The potential development of affordable housing units and mixed-use developments in these areas may create opportunities for additional resources to the existing community.



Figure 3-12: TCAC Opportunity Areas, Orange



Source: California

Department of Housing and Community Development – AFFH Data Viewer



For many households, access to neighborhoods with higher levels of opportunity can be more difficult due to discrimination and when there may not be a sufficient range and supply of housing in such neighborhoods. In addition, the continuing legacy of discrimination and segregation can impact the availability of quality infrastructure, educational resources, environmental protections, and economic drivers, all of which can create disparities in access to opportunity.

### Opportunity Areas – Education

The TCAC/HCD Opportunity Area Maps include education data, as illustrated in **Figure 3-13**. This data represents opportunity levels based on the following four factors:

- Math proficiency – Percentage of 4th graders who meet or exceed math proficiency standards.
- Reading proficiency – Percentage of 4th graders who meet or exceed literacy standards.
- High school graduation rates – Percentage of high school cohort that graduated on time.
- Student poverty rate – Percentage of students not receiving free or reduced-price lunch.

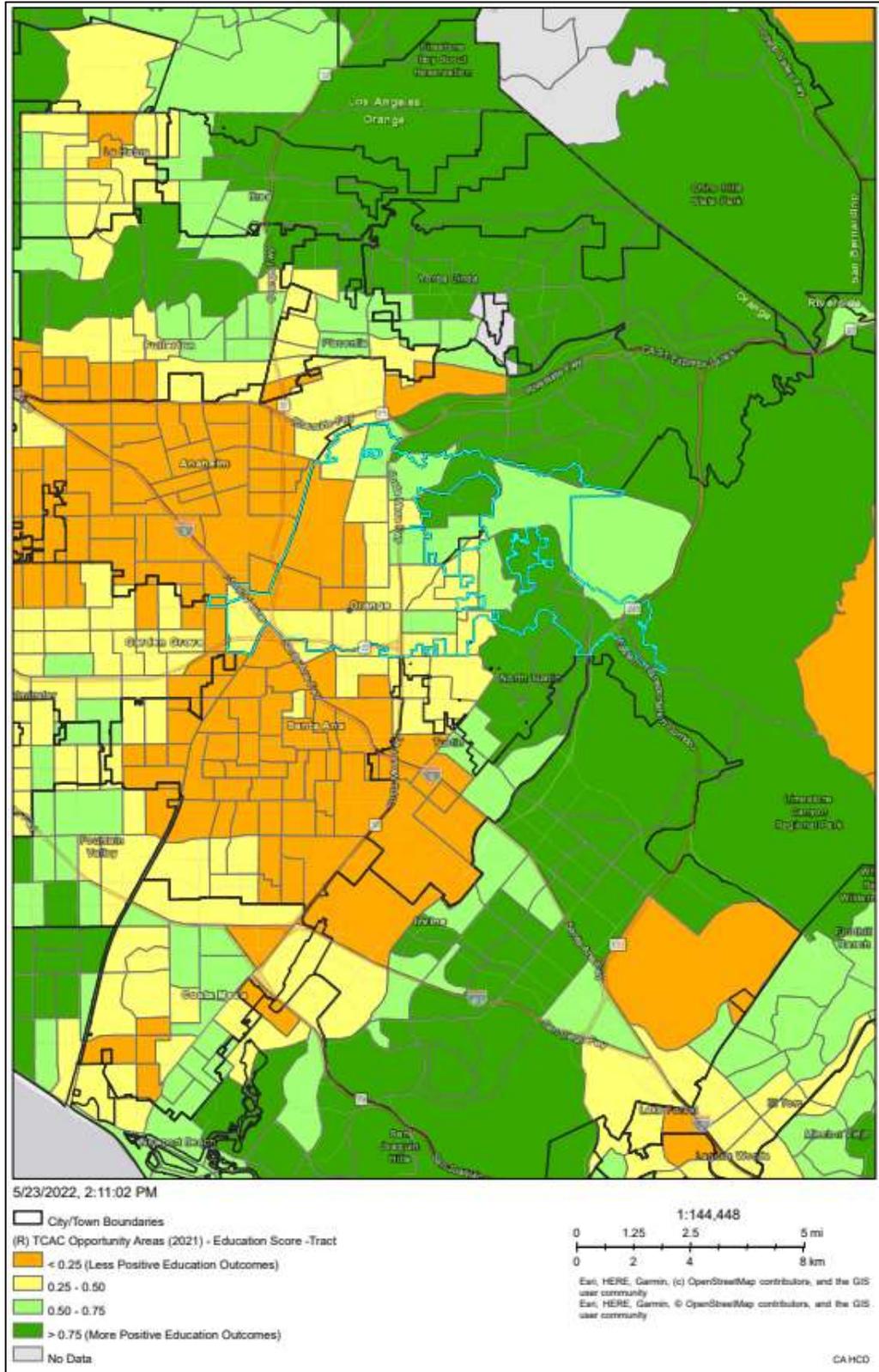
**Figure 3-13** shows areas of less positive education outcomes in the City’s center and western half. Areas of more positive education outcomes exist the west of the City.

Title I was established to provide all children with the opportunity to receive a fair, equitable, and high quality education as well as to help close the achievement gaps. Title I uses federal monies that are supplemental, meaning outside the general fund to help meet the needs of low-achieving students in the highest-poverty schools. Schools that qualify for these funds deliver supplemental services through a comprehensive school-wide plan required by the law. The main goal is to close the achievement gap and equalize education for all students. Within Orange Unified School District there are 13 Title I Elementary Schools, 2 Title I Middle Schools, and one Title I high School:

- |                         |   |
|-------------------------|---|
| • California Elementary | • Sycamore Elementary                     |
| • Cambridge Elementary  | • Taft Elementary                         |
| • Esplanade Elementary  | • West Orange Elementary                  |
| • Fairhaven Elementary  | • Community Day School (Targeted Title I) |
| • Handy Elementary      | • Portola Middle School                   |
| • Jordan Elementary     | • Yorba Middle School                     |
| • Lampson Elementary    | • Orange High School                      |
| • Palmyra Elementary    |   |
| • Prospect Elementary   |   |



**Figure 3-13: TCAC Education Opportunity Areas, Orange**



Source: California Department of Housing and Community Development – AFFH Data Viewer



### Opportunity Areas – Economy

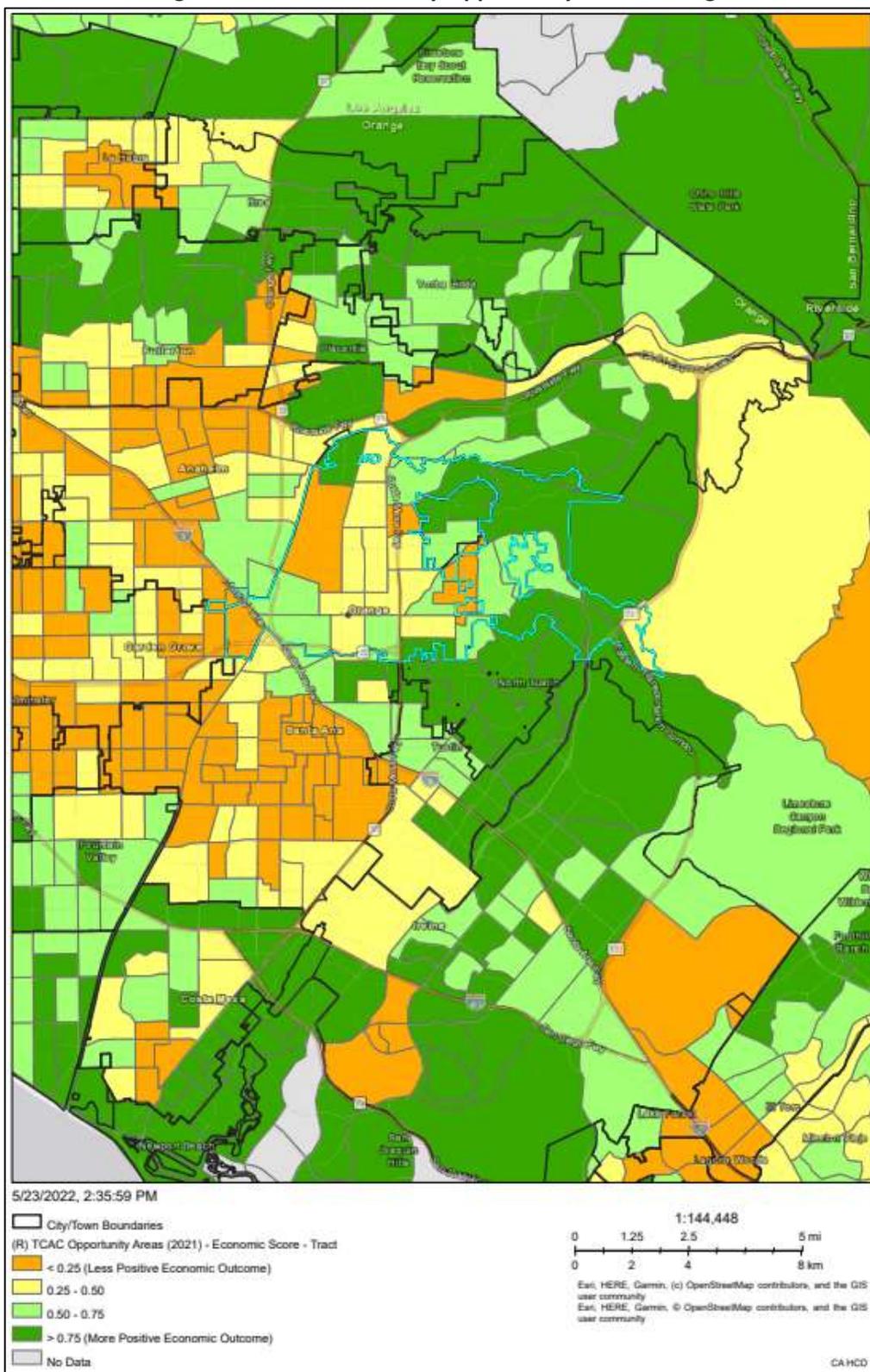
The TCAC/HCD Opportunity Area Maps include economic data, as illustrated in **Figure 3-14**. This data represents opportunity levels based on the following five factors:

- Poverty – Percent of population with income above 200 percent of federal poverty line.
- Adult Education – Percent of adults with a bachelor's degree or above.
- Employment – Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces.
- Job Proximity – Number of jobs filled by workers with less than a Bachelor of Arts degree that fall within a given radius (determined by the typical commute distance of low-wage workers in each region) of each census tract population-weighted centroid.
- Median Home Value - Value of owner-occupied units.

**Figure 3-14** shows economic opportunity scores for Orange and the surrounding region. As illustrated, the City has fairly moderate to high positive economic outcome areas, with some areas of less positive outcomes to the north west and center of the City.



**Figure 3-14: TCAC Economy Opportunity Areas, Orange**



Source: California Department of Housing and Community Development – AFFH Data Viewer



HUD developed the opportunity indicators to help inform communities about disparities in access to opportunity, the scores are based on nationally available data sources and assess resident's access to key opportunity assets in the City. **Table 3-24** provides the index scores (ranging from zero to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

**Table 3-24** below displays the opportunity indices by race and ethnicity for persons in Orange. According to the data, there is low poverty among the population of Orange, with the exception of the population who identified as black, with the lowest poverty score at 32.85. Additionally, the access to quality education system is moderate among all racial/ethnic groups (each group has an opportunity index score above 45 but not surpassing 65). The data shows the following:

- The City offers moderate labor and economic opportunity as well as sufficient access to transportation.



- Transportation is considered affordable among all race and ethnic groups in the City (all scoring above 70).
- Very low environmental health index scores, meaning there is high exposure to harmful pollutants for all race and ethnic groups in the City. Each group has a score below 15, indicating poor environmental quality across the City, this can be due in part to high levels of traffic, proximity to industrial development or other natural environmental risks.

**Table 3-24: Opportunity Indicators by Race/Ethnicity in the City of Orange**

(Orange, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
<b>Total Population</b>							
White, Non-Hispanic	59.85	60.76	61.19	87.39	72.03	69.31	10.04
Black, Non-Hispanic	52.12	48.57	51.47	89.40	77.99	78.41	8.77
Hispanic	48.30	50.65	52.77	88.89	76.83	76.42	9.01
Asian or Pacific Islander, Non-Hispanic	59.06	58.78	59.94	87.51	72.50	67.82	9.94
Native American, Non-Hispanic	54.37	55.48	56.10	88.33	74.75	73.95	9.39
<b>Population below federal poverty line</b>							
White, Non-Hispanic	57.04	52.92	58.45	89.18	76.75	78.49	9.16
Black, Non-Hispanic	32.85	42.16	41.19	83.58	78.05	89.55	9.52
Hispanic	45.47	53.35	53.02	89.09	76.93	73.57	9.08
Asian or Pacific Islander, Non-Hispanic	52.82	43.86	48.07	89.57	79.90	81.30	8.42
Native American, Non-Hispanic	64.21	51.31	53.78	90.52	79.37	86.78	8.55

Source: Department of Housing and Urban Development, Fair Housing Maps, Accessed March 2021.

### Access to Transit

Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided, Orange scored a 5.1 AllTransit performance score, illustrating a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. In comparison to neighboring cities – Santa Ana scored a 6.6, Anaheim scored a 4.9, Villa Park scored a 1.4, and Tustin



scored a 4.8. Access to transportation increases both the economic and environmental/health opportunities. Additionally, AllTransit provides the following data for Orange transportation:

- 99% of jobs are located within ½ of transit.
- 78,470 customer households have access to a business within a 30-minute transit commute.
- 3.35% of workers walk to work and 0.96% bike to work
- There are no households within a ½ miles of high frequency transit.
- On average, there are 5 transit routes within ½ of a block group on average.

**Table 3-25: Opportunity Indicator – Transit**

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within 1/2 Mile	Jobs Accessible in 30-min trip	Commuters Who Use Transit	Transit Routes within 1/2 Mile
Orange	5.1	775	224,776	2.9%	5
Orange County	4.2	528	172,595	2.28%	4

*Source: AllTransit Fact Sheet, Orange, 2022.*

**Figure 3-15: AllTransit Performance Score – Orange**



*Source: AllTransit Fact Sheet, 2021.*



### Environmental Burdens

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants. **Figure 3-16** below displays mapped results for the CalEnviro Screen in Orange and the Orange County region. The map shows that Orange is made up of mostly moderate to low percentile census tract – reflecting a community that is not overly burdened by environmental factors.

**Table 3-26** and **3-27** below identifies the CalEnviro Screen scores for the highest and lowest scoring census tracts in Orange, respectively. **Table 3-26** shows the City’s most environmentally burdened census tract (CalEnviroScreen 4.0 Percentile: 76) which has a population made up of 79.8 percent Hispanic, 9.5 percent White, 6.4 percent Asian American, 2.2 percent Native American, 1.3 percent Other, and 0.8 percent African American. **Table 3-27** shows the City’s least environmentally burdened census tract (CalEnviroScreen 4.0 Percentile: 7) which has a population made up of 71.8 percent White, 20 percent Hispanic, 5.4 percent Asian American, and 2.5 percent Other.



**Table 3-26: CalEnviro Screen 4.0 – Highest Scoring Census Tract (6059076204)**

Pollutant	Percentile*	Health Risk/Burden	Percentile*
Ozone	54	Asthma	30
Particulate Matter 2.5	83	Low Birth Weight	12
Diesel Particulate Matter	74	Cardiovascular Rate	34
Pesticides	20	Education	90
Toxic Releases	99	Linguistic Isolation	79
Traffic	37	Poverty	77
Drinking Water	55	Unemployment	47
Cleanup Sites	99	Housing Burden	68
Groundwater Threats	70		
Hazardous Waste	99		
Impaired Waters	0		
Solid Waste	93		

\*Percentile derived using a weighted scoring system to determine average pollution burden/ socioeconomic scores relative to other census tracts.  
 Source: CalEnviro Screen 4.0 Map Tool. Accessed May 23, 2022.

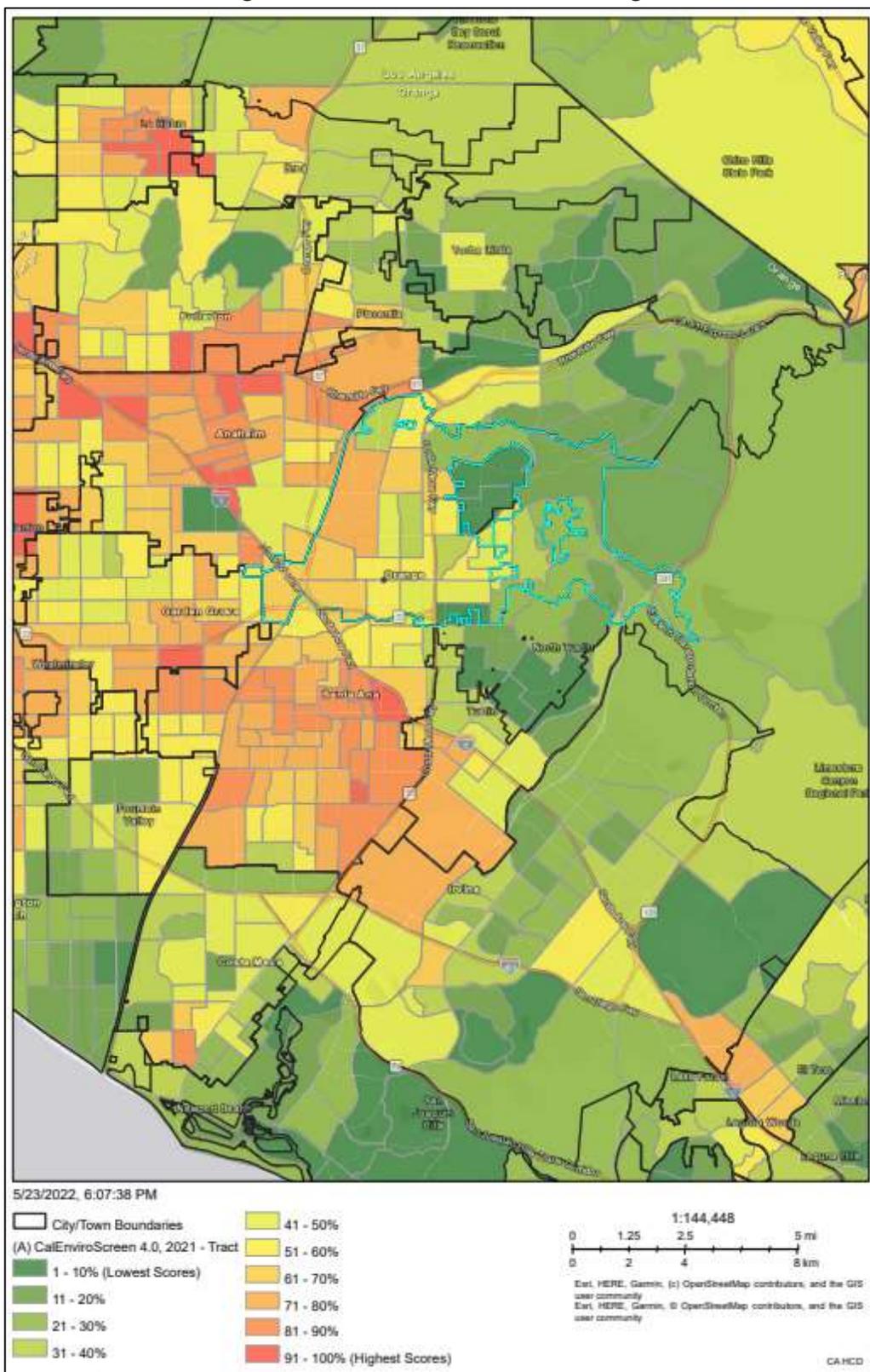
**Table 3-27: CalEnviro Screen 4.0 – Highest Scoring Census Tract (6059075808)**

Pollutant	Percentile*	Health Risk/Burden	Percentile*
Ozone	58	Asthma	10
Particulate Matter 2.5	69	Low Birth Weight	1
Diesel Particulate Matter	68	Cardiovascular Rate	6
Pesticides	1	Education	15
Toxic Releases	88	Linguistic Isolation	6
Traffic	87	Poverty	29
Drinking Water	55	Unemployment	28
Cleanup Sites	44	Housing Burden	3
Groundwater Threats	50		
Hazardous Waste	10		
Impaired Waters	0		
Solid Waste	76		

\*Percentile derived using a weighted scoring system to determine average pollution burden/ socioeconomic scores relative to other census tracts.  
 Source: CalEnviro Screen 4.0 Map Tool. Accessed May 23, 2022.



Figure 3-16: CalEnviroScreen 4.0 – Orange



Source: AllTransit Fact Sheet, 2021.



### 3. Discussion of Disproportionate Housing Needs

The analysis of disproportionate housing needs within Orange evaluated existing housing need, need of the future housing population, and units within the community at-risk of converting to market-rate.

#### Future Growth Need

The City's future growth need is based on the RHNA production of 1,067 very low and 604 low income units within the 2021-2029 planning period. **Appendix B** of this Housing Element shows the City's ability to meet its 2021-2029 RHNA need at all income levels. This demonstrates the City's ability to accommodate the anticipated future affordable housing needs of the community.

#### Existing Need

As described in Section 3.F.1 of this Housing Element, the Orange County Housing Authority administers Section 8 Housing Choice vouchers within the City of Orange. Additionally, the City currently has a 206 household waitlist to receive Section 8 Housing Choice vouchers.

#### Housing Needs in Orange

A variety of factors affect housing needs for different households. Most commonly, disability, household income and households' characteristics shape the type and size of housing units needed, as well as accessibility based on existing units in a City. **Tables 3-28** through **3-35** displayed data for demographic characteristics of Orange, as compared to the County of Orange and the State of California. Additional detailed analysis of the Orange community demographics is outlined in **Chapter 2: Community Profile** of this Housing Element.

**Table 3-28** displays the data for persons with disabilities in the City, County, and State. Overall, about 10 percent of the California population reported having at least one disability. In the City, about 8 percent of persons reported at least one disability. The County reported a slightly higher percentage than the City and the City at 8.5 percent. Of the 8 percent Orange residents who reported a disability, the majority were independent living and ambulatory difficulties, which could be tied to the City's senior population. Ease of reasonable accommodation procedures and opportunity for accessible housing can provide increased housing security for the population with disabilities.

**Figure 3-17** and **3-18** show the trend and propensity for persons having at least one disability throughout Orange. Between 2014 and 2019, the City has decreased in the census tracts reporting 10 to 20 percent of the population having at least one disability. Based on the two figures, the data may indicate a move towards neighborhoods north of the City.

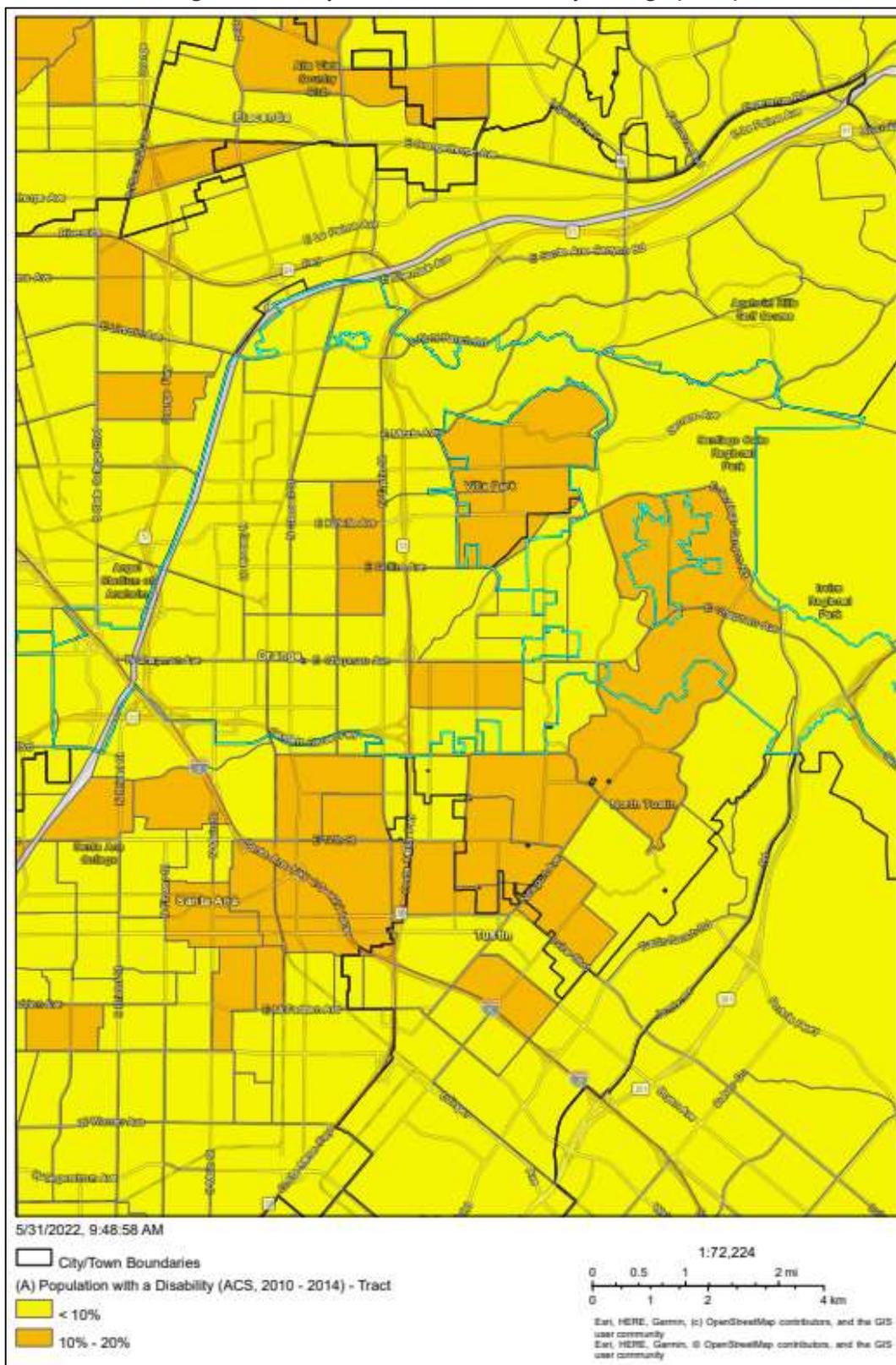


Table 3-28: Population by Disability Type, Compared by Geography, 2019			
Disability	City of Orange	County of Orange	California
Total with a Disability	8.1%	8.5%	10.6%
Hearing Difficulty	2.3%	2.5%	2.9%
Vision Difficulty	1.1%	1.5%	2%
Cognitive Difficulty	3.4%	3.4%	4.3%
Ambulatory Difficulty	4.2%	4.5%	5.8%
Self-care Difficulty	2.2%	2.2%	2.6%
Independent Living	4.0%	4.3%	5.5%

*Source: American Community Survey, 5-Year Estimates, 2019.*



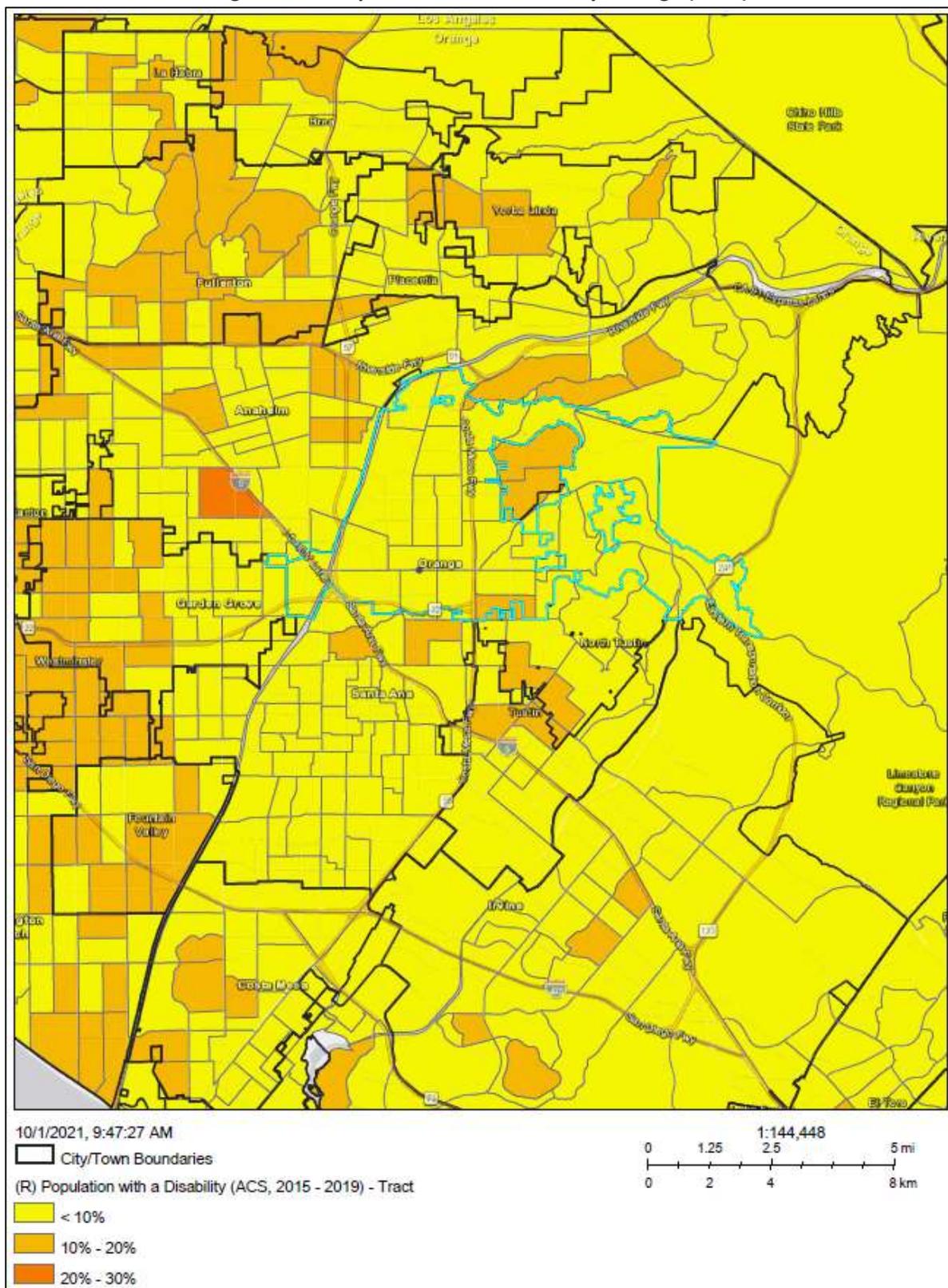
**Figure 3-17: Population with a Disability, Orange (2014)**



Source: California Department of Housing and Community Development – AFFH Data Viewer



Figure 3-18: Population with a Disability, Orange (2019)



Source: California Department of Housing and Community Development – AFFH Data Viewer



**Table 3-29** displays household type and income data for the State, County and City. Overall, the City has a larger percentage of family households than the County and State; this includes family households, married-couple family households, and those with children. Of the three jurisdictions, the State has the largest percentage of non-family households at approximately 2 percent more than Orange County and about 6 percent more than the City. The City has a higher percentage of households with at least one senior over the age of 60 as compared to the state (29.2 percent) but a lower percentage than the County (39.9 percent).

Familial Status	City of Orange	County of Orange	California
Total Households	43,075	1,037,492	13,044,266
Family Households	73.1%	71.7%	68.7%
Married-Couple Family Households	56.2%	54.9%	49.8%
With Children	23.7%	30.9%	34%
Non-Family Households	26.8%	28.3%	31.3%
Households with one or more people 60 years+	37.8%	39.9%	29.2%

*Source: American Community Survey, 5-Year Estimates, 2019*

Regarding household income, the City had a higher median household income than the County and State in 2019 (\$91,793). As **Table 3-30** shows, majority of the City’s households are higher earning; in total 45 percent (nearly half of the City’s households) earn \$100,000 or more. In the state, nearly 38 percent of households earn \$100,000 or more and 45.2 percent in the County of Orange. Just under 26 percent of City residents earn less than \$50,000 annually, compared to 27 percent and 34 percent for the County and State, respectively.

Households Income	City of Orange	County of Orange	California
Less than \$10,000	3.7%	4.2%	4.8%
\$10,000-\$14,999	2.5%	2.7%	4.1%
\$15,000-\$24,999	5.1%	5.6%	7.5%
\$25,000-\$34,999	5.4%	6.0%	7.5%
\$35,000-\$49,999	8.9%	8.8%	10.5%
\$50,000-\$74,999	16.1%	14.6%	15.5%
\$75,000-\$99,999	12.8%	12.8%	12.4%
\$100,000-\$149,999	19.7%	18.6%	16.6%
\$150,000-\$199,999	12.2%	11.1%	8.9%
\$200,000 or More	13.5%	15.5%	12.2%
Median Income	\$91,793	\$90,234	\$75,235

*Source: American Community Survey, 5-Year Estimates, 2019*



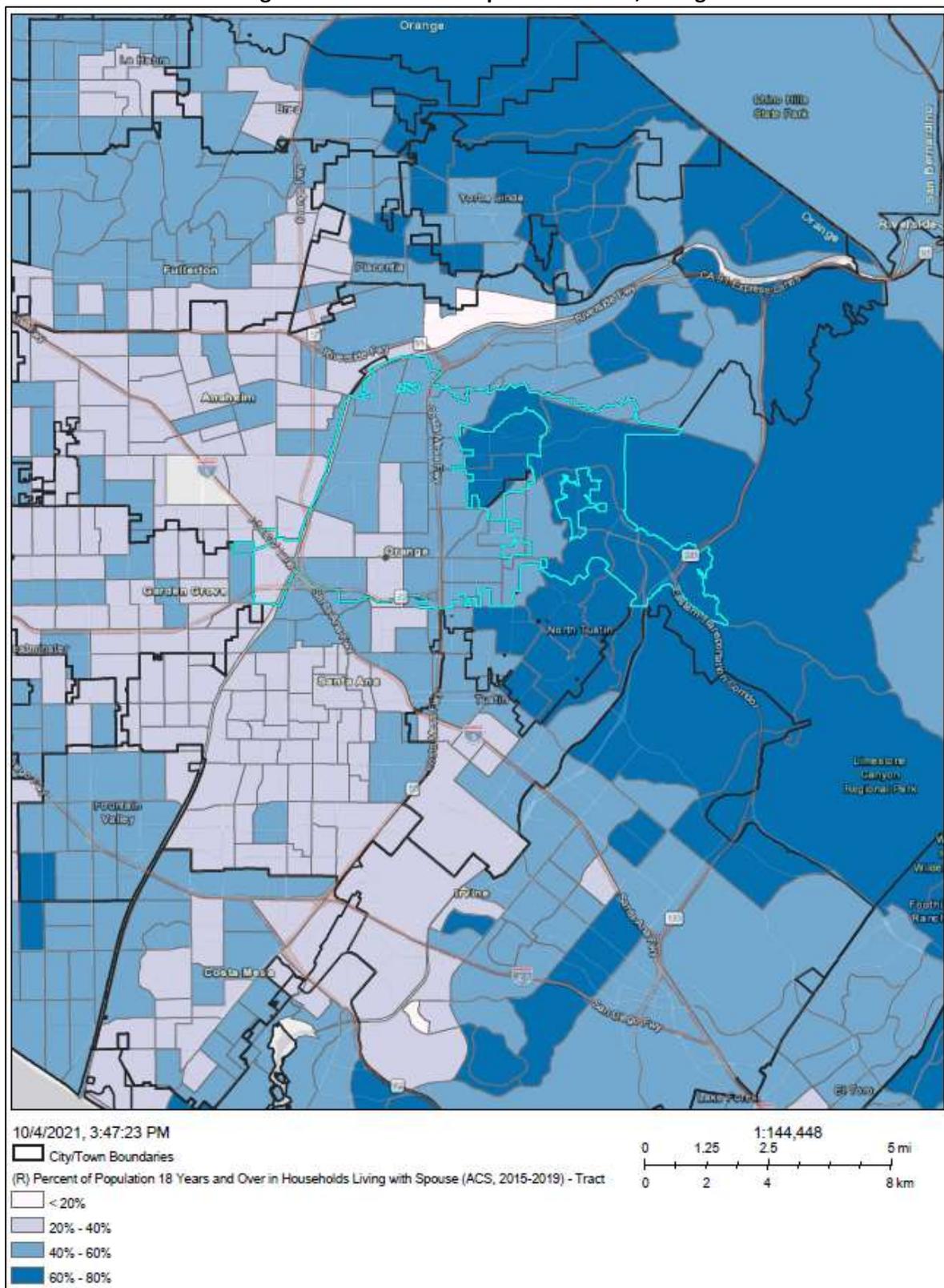
**Figure 3-19** shows the percentage of married-couple households living throughout the City of Orange and neighboring communities. As the figure shows, married-couple households increase towards the east and decrease towards the west. The lowest percentages of married-couple households are surrounding the downtown Orange and Outlets at Orange areas. **Figure 3-20** shows a similar trend for households with children living in married-couple family households.

**Figure 3-21** shows children living in female households without a spouse present. The majority of the City has lower percentages, except for a few census tracts reporting 20 to 40 percent of children living in female-headed households. These few census tracts overlap with those that report lower percentages of married-couple family households.

**Figure 3-22** shows the City of Orange has very little single-occupancy households. As is the trend with most neighboring communities, all census tracts in the City report less than 20 percent persons over 18 years of age in households living alone.



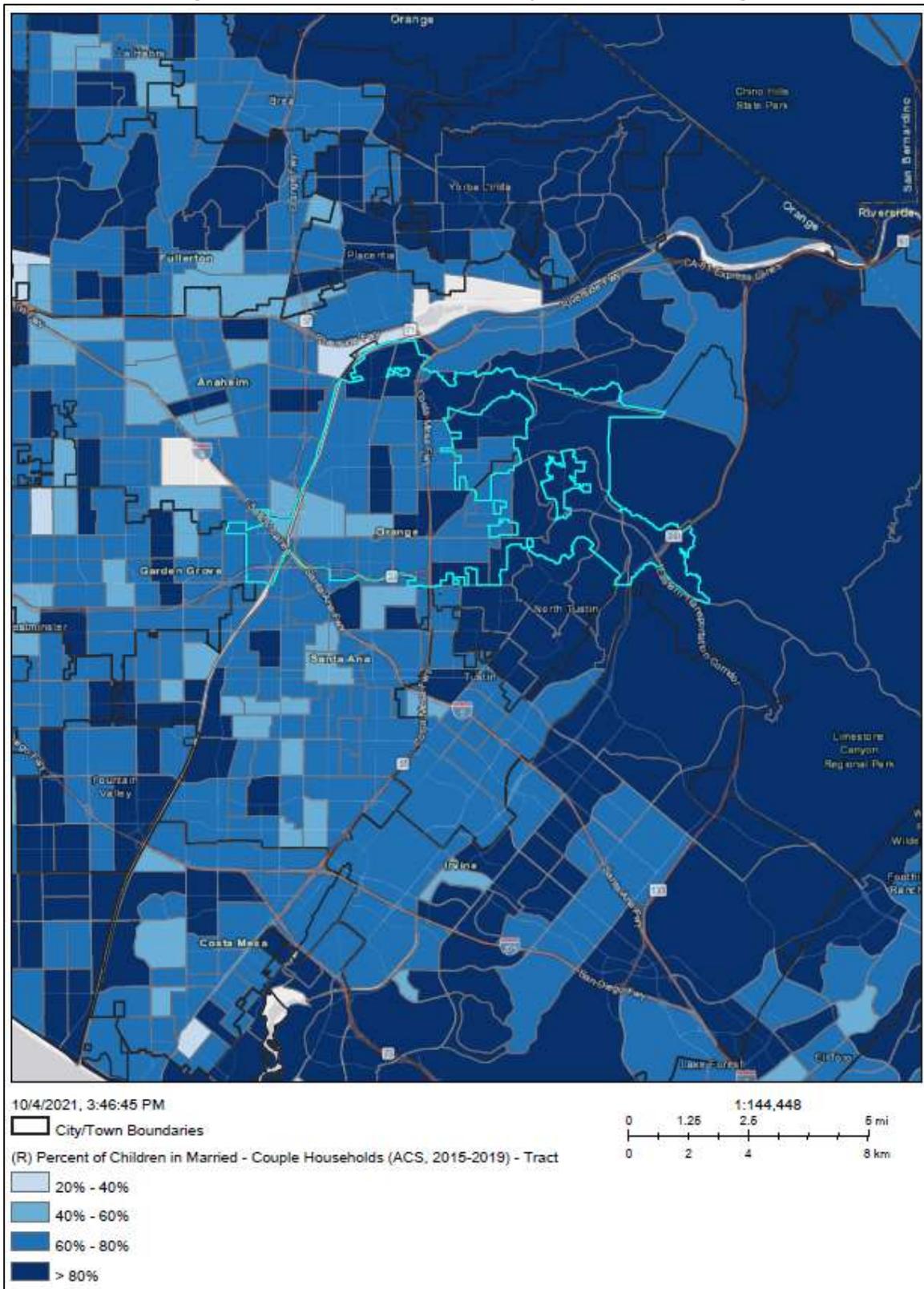
Figure 3-19: Married-Couple Households, Orange



Source: California Department of Housing and Community Development – AFFH Data Viewer



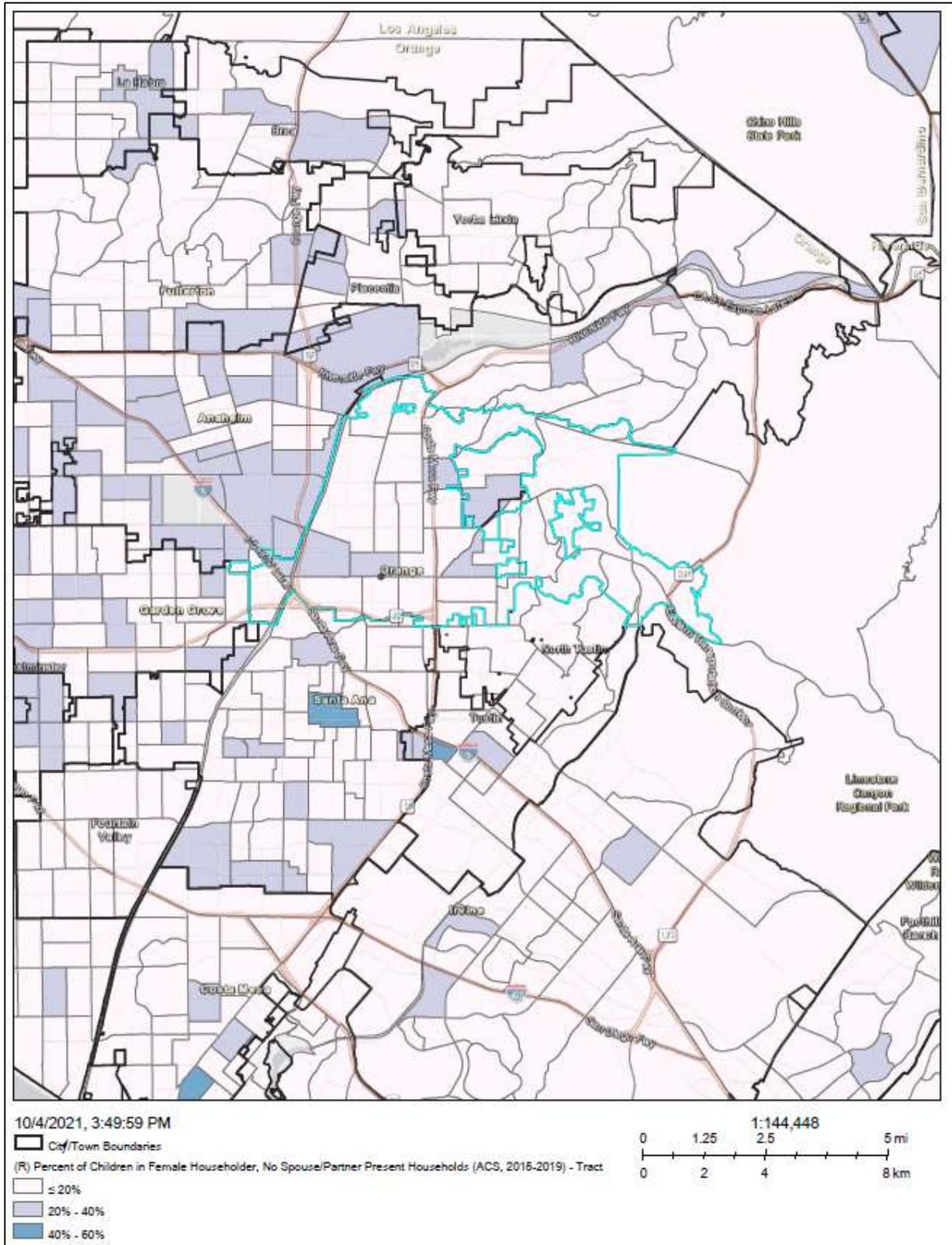
Figure 3-20: Children in Married-Couple Households, Orange



Source: California Department of Housing and Community Development – AFFH Data Viewer



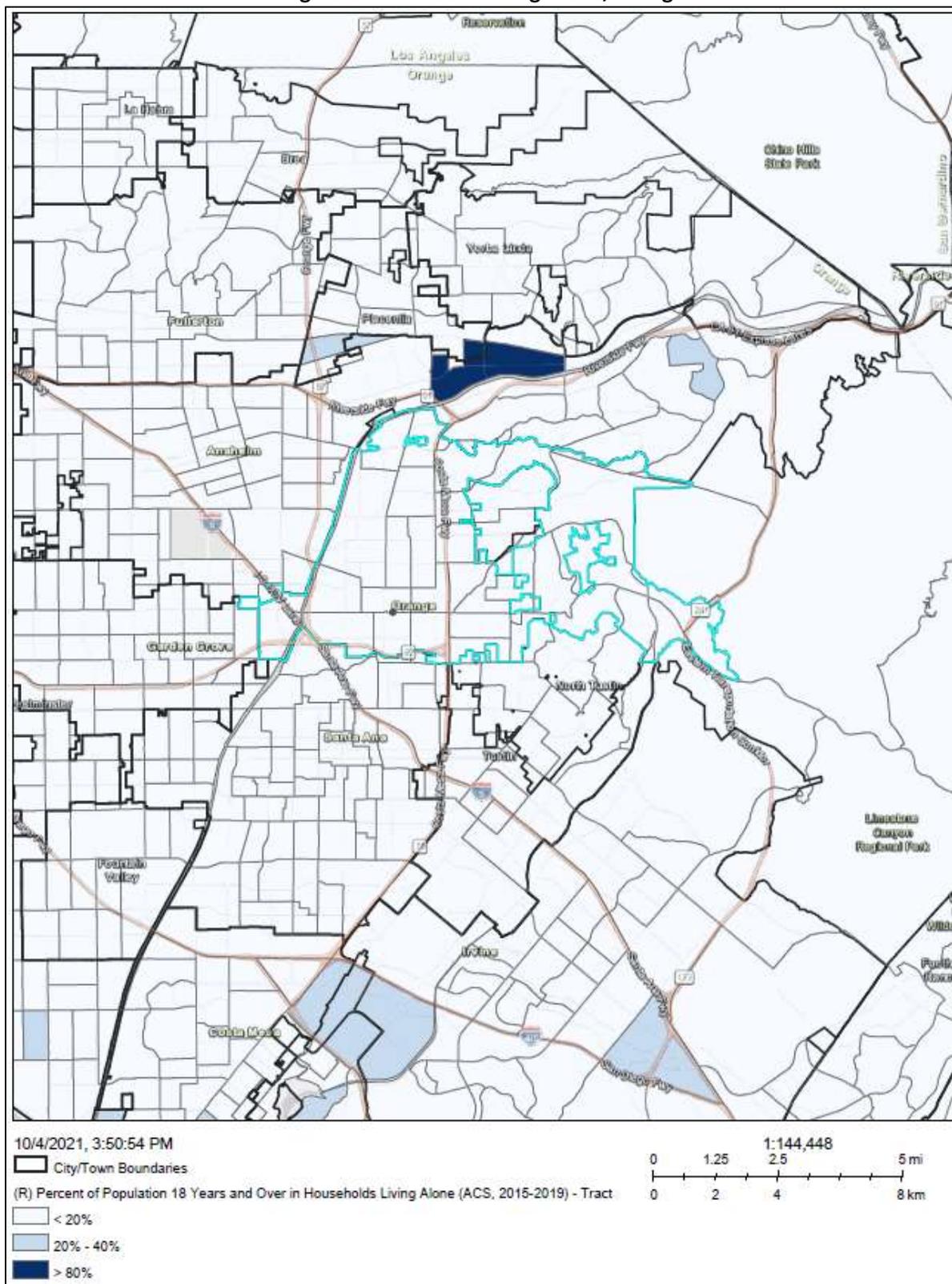
**Figure 3-21: Children in Female-Headed Households, Orange**



Source: California Department of Housing and Community Development – AFFH Data Viewer



**Figure 3-22: Persons Living Alone, Orange**



Source: California Department of Housing and Community Development – AFFH Data Viewer



**Table 3-31** displays data for households experiencing overpayment or cost burden in the State, County and City. Housing Cost burden has a number of consequences for a household, mainly displacement from their existing living situation creating limited access essential goods and often employment by potentially increasing commute times. Overall, the percentage of households that experience a cost burden greater than 30 percent is similar amongst the City, County, and State with all three reporting about 20 percent. The City has a slightly lower percentage of households that have a high cost burden over 50 percent (17.8 percent in the City, compared to about 19 percent in the County and State). Increased opportunity for affordable housing and housing assistance funds help to prevent cost burden on households.

Overpayment/Cost Burden	City of Orange	County of Orange	California
Cost Burden > 30%	20.3%	21.2%	20.67%
Cost Burden > 50%	17.8%	19.3%	19.4%
Cost Burden Not Available	1.1%	1.4%	1.4%

*Source: Consolidated Planning/CHAS Data, 2013- 2017.*

**Table 3-32** displays data for household tenure (owner vs. renter) for the State, County and City. Homeownership is a crucial foundation for helping families with low incomes build strength, stability and independence. The opportunity for transition into the homebuyer’s market is important for persons and households in different communities, homeownership allows for increased stability and opportunity to age in place. **Table 3-32** shows that the City has a comparable rate of homeownership to the County and a slightly lower ownership rate that the State.

Additionally, **Table 3-33** displays data for overcrowding in the State, County and City. Overcrowding is defined as between 1.01 and 1.5 persons per room in a household, and severe overcrowding is defined as more than 1.51 persons per room. Overcrowding often occurs when nonfamily members combine incomes to live in one households, such as college students and roommates, it also occurs when there is not enough size appropriate housing options for large or multigenerational families. The City experiences low rates of overcrowding in comparison to the County and the State. According to the data, overcrowding occurs more frequently in renter households rather than owner households. In Orange, owner households that are severely overcrowded represent 0.7 percent of all households, while severely overcrowded renter households represent 4.5 percent, a trend similar in the County and State.

Household Tenure	City of Orange	County of Orange	California
Owner Households	57.9%	57.4%	66.0%
Renter Households	42.1%	42.6%	34.0%
Total Occupied Housing Units	43,075	1,037,492	13,044,266

*Source: American Community Survey, 5-Year Estimates, 2019.*



Table 3-33: Households by Overcrowding, Compared by Geography			
Overcrowding and Tenure	City of Orange	County of Orange	California
<b>Owner Households</b>			
Overcrowded	1.4%	2.6%	1.6%
Severely Overcrowded	0.7%	1.0%	0.6%
<b>Renter Households</b>			
Overcrowded	10.1%	9.8%	3.6%
Severely Overcrowded	4.5%	6.0%	2.4%

*Source: American Community Survey, 5-Year Estimates, 2019.*

### Housing Stock in Orange

**Table 3-34** displays comparative housing stock data for the State, County and City. **Table 3-34** below shows data for occupied housing units by type. A variety of housing stock provides increased opportunity in communities for different size and households types. The majority of housing stock in Orange is classified as one-unit, detached housing, or single-family housing. Just under 13 percent of Orange homes include 20 or more units, referred to as multi-family housing. In comparison to the County Orange has a greater amount of single-family homes, and an overall smaller number multi-family housing (2 or more units).

Table 3-34: Occupied Housing Units by Type, Compared by Geography			
Housing Unit Type	City of Orange	County of Orange	California
1, detached	54.9%	50.6%	57.7%
1, attached	9.6%	12.3%	7.0%
2 units	3.0%	1.6%	2.4%
3 or 4 units	8.7%	6.9%	5.5%
5 to 9 units	5.2%	6.7%	6.0%
10 to 19 units	3.4%	5.4%	5.2%
20 or more units	12.8%	13.7%	12.3%
Mobile home or other type of housing	2.4%	2.7%	3.7%

*Source: American Community Survey, 5-Year Estimates, 2019.*

**Table 3-35** below displays housing stock by year built or the City, County, and State. Older housing generally requires more upkeep, regular maintenance and can cause a cost burden on both renters and homeowners. Majority of Orange’s housing stock was built between 1950 and 1989, the City has a large number of historic homes and historic districts. When well maintained, historic homes can be energy efficient by design, they may also allow for subsidies in exchange for maintenance.

Majority of the County’s and State’s housing units were built between 1980 and 2009 whereas the distribution of development was more dispersed from 1950 to 1990 in the State. Overall, increased numbers of older housing which is not maintained can lead to cost burden and substandard living conditions.



**Table 3-35: Housing Unit by Type, Compared by Geography**

Year Built	City of Orange	County of Orange	California
Built 2014 or later	1.1%	2.7%	1.7%
Built 2010 to 2013	1.3%	2.0%	1.7%
Built 2000 to 2009	7.1%	8.3%	11.2%
Built 1990 to 1999	9.9%	11.7%	10.9%
Built 1980 to 1989	11.6%	14.9%	15.0%
Built 1970 to 1979	22.9%	23.3%	17.6%
Built 1960 to 1969	24.2%	19.5%	13.4%
Built 1950 to 1959	14.6%	13.0%	13.4%
Built 1940 to 1949	1.8%	2.1%	5.9%
Built 1939 or earlier	5.5%	2.5%	9.1%

Source: American Community Survey, 5-Year Estimates, 2019.

#### 4. Displacement Risk

The potential for economic displacement risk can result from a variety of factors, including large-scale development activity, neighborhood reinvestment, infrastructure investments, and changes in local and regional employment opportunity. Economic displacement can be an inadvertent result of public and private investment, where individuals and families may not be able to keep pace with increased property values and market rental rates.

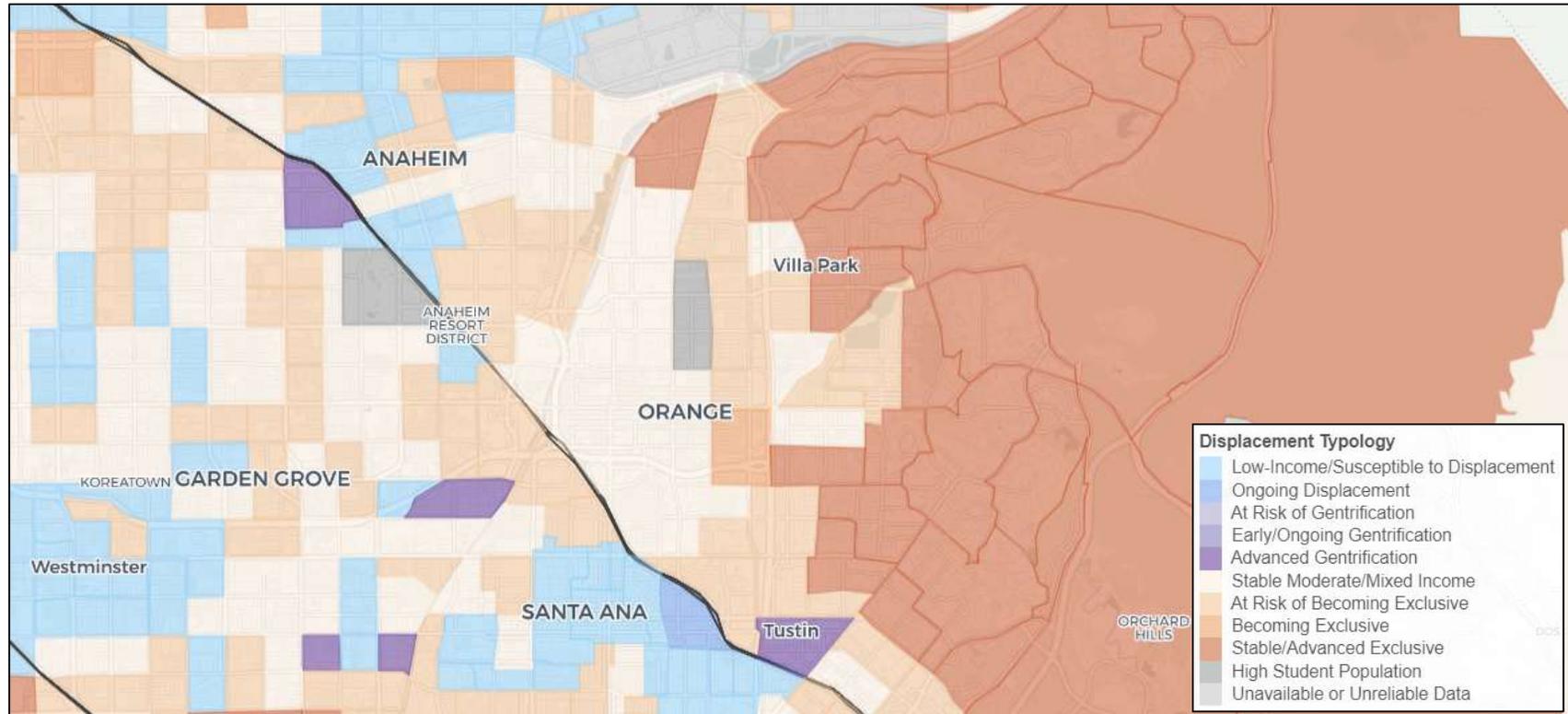
##### Urban Displacement

The Urban Displacement Project (UDP) is a research and action initiative of the University of California Berkeley and the University of Toronto. UDP conducts community-centered, data-driven, applied research toward more equitable and inclusive futures for cities. UDP developed a neighborhood change database to map neighborhood transformations and identify areas vulnerable to gentrification and displacement, based on 2015 data from the American Community Survey. This data was developed to assist local decision makers and stakeholders better plan for existing communities and provide additional resources to areas in need or at-risk of displacement and gentrification.

**Figure 3-15** shows there are large area of the City currently marked as Stable Moderate/Mixed Income and Stable/Advance Exclusive. Only a few census tracts are actively at risk or currently becoming exclusive. Additionally, the City has one census tract which contains Chapman University and is identified as a High Student Population area. There currently are not any census tracts reporting ongoing displacement or gentrification in the City.



**Figure 3-23: Urban Displacement Project - Gentrification and Displacement**



Source: Urban Displacement Project, University of California Berkeley (2021).



**Table 3-36** is a key for **Figure 3-23**, pulled directly from the data source.

<b>Table 3-36: Displacement Typology Criteria and Orange Census Tracts</b>	
<b>Modified Types and Criteria</b>	
Low-Income/Susceptible to Displacement	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018.</li> </ul>
Ongoing Displacement of Low-Income Households	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018.</li> <li>• Absolute loss of low-income households, 2000-2018.</li> </ul>
At Risk of Gentrification	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018.</li> <li>• Housing affordable to low or mixed low-income households in 2018.</li> <li>• Didn't gentrify 1990-2000 OR 2000-2018.</li> <li>• Marginal change in housing costs OR Zillow home or rental value increases in the 90<sup>th</sup> percentile between 2012-2018.</li> <li>• Local and nearby increases in rent were greater than the regional median between 2012-2018 OR the 2018 rent gap is greater than the regional median rent gap.</li> </ul>
Early/Ongoing Gentrification	<ul style="list-style-type: none"> <li>• Low or mixed low-income tract in 2018.</li> <li>• Housing affordable to moderate or mixed moderate-income households in 2018.</li> <li>• Increase or rapid increase in housing costs OR above regional median change in Zillow home or rental values between 2-12-2018.</li> <li>• Gentrified in 1990-2000 or 2000-2018.</li> </ul>
Advanced Gentrification	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018.</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.</li> <li>• Marginal change, increase, or rapid increase in housing costs.</li> <li>• Gentrified in 1990-2000 or 2000-2018.</li> </ul>
Stable Moderate/Mixed Income	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018.</li> </ul>
At Risk of Becoming Exclusive	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018.</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.</li> <li>• Marginal change or increase in housing costs.</li> </ul>
Becoming Exclusive	<ul style="list-style-type: none"> <li>• Moderate, mixed moderate, mixed high, or high-income tract in 2018.</li> <li>• Housing affordable to middle, high, mixed moderate, and mixed high-income households in 2018.</li> <li>• Rapid increase in housing costs.</li> <li>• Absolute loss of low-income households, 2000-2018.</li> <li>• Declining low-income in-migration rate, 2012-2018.</li> <li>• Median income higher in 2018 than in 2000.</li> </ul>
Stable/Advanced Exclusive	<ul style="list-style-type: none"> <li>• High-income tract in 2000 and 2018</li> <li>• Affordable to high or mixed high-income households in 2018.</li> <li>• Marginal change, increase, or rapid increase in housing costs.</li> </ul>
High Student Population	
<i>Source: Urban Displacement Project, University of California Berkeley (2021).</i>	



***Assisted Units “At-Risk” of Conversion***

Appendix B of this housing Element outlines the City’s strategy to accommodate growth and future housing production in Orange. The RHNA accommodation strategy does not include plans or identifies land to accommodate new housing, which will replace current residents, specifically residents in affordable housing. Displacement can also occur as covenants for deed restricted affordable housing units expire. Affordable covenants help to ensure that certain housing units remain affordable for an extended period. Covenants help balance the housing market in a community and provide lasting affordable options to low and very low-income households. **Table 3-37** below display the data for persons within the City of Orange who qualify for supported low income housing.

**Table 3-37: Publicly Supported Housing Demographics, Orange**

Orange (City)	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Project-Based Section 8	89	49.17%	2	1.10%	76	41.99%	13	7.18%
HCV Program	221	35.25%	44	7.02%	218	34.77%	144	22.97%
LIHTC	943	39.03%	47	1.95%	1347	55.75%	104	4.30%
Total Households	24,840	57.94%	430	1.00%	11,370	26.52%	5,535	12.91%
0-30% of AMI	2,880	50.79%	50	0.88%	1,880	33.16%	740	13.05%
0-50% of AMI	4,290	41.67%	65	0.63%	3,785	36.77%	1,270	12.34%
0-80% of AMI	8,130	45.70%	200	1.12%	6,635	37.30%	1,800	10.12%

*Source: County of Orange Analysis of Impediments to Fair Housing, 2020-2024.*

Additionally, **Table 3-38** below identifies all deed restricted projects in Orange. There is one current project with covenants which will expire in the 2021-2029 planning period.

**Table 3-38: Affordable Housing Units in Orange with Covenants and Deed Restrictions**

Project Name/Address	Tenant Type	Number of Assisted Unit	Number of Bedrooms	Starting Years of Restriction	Ending Year of Restriction
<b>Adams Triplex I</b> 1837-1841 East Adams Avenue Orange, CA 92867	Family	3	1, 2, and 3	1997	2027
<b>Adams Triplex II</b> 1915-1919 East Adams Avenue Orange, CA 92867	Family	3	1, 2, and 3	1998	2053
<b>Adams Triplex III</b> 1741-1745 East Adams Avenue Orange, CA 92867	Family	3	1, 2, and 3	1999	2054
<b>Alice Clark Orange Blossom Apartments</b> 141 East Walnut Avenue Orange, CA 92867	Elderly	4	1, 2, and 3	1997	2052
<b>Allure Apartments</b> 3099 West Chapman Avenue Orange, CA 92867	Workforce Housing	265	0, 1, and 2	2021	2051
<b>Cameo Apartments</b> 1055 West Town and Country Road Orange, CA 92867	Workforce Housing	262	0, 1, 2, and 3	2021	2051
<b>Casas Del Rio</b> 1740 E La Veta Avenue Orange, CA 92866	Elderly	40	1 and 2	N/A	2028*



Table 3-38: Affordable Housing Units in Orange with Covenants and Deed Restrictions

Project Name/Address	Tenant Type	Number of Assisted Unit	Number of Bedrooms	Starting Years of Restriction	Ending Year of Restriction
<b>Chestnut Place/Fairway Manor</b> 1745 East Fairway Drive Orange, CA 92866	Elderly	49	1, 2, and 3	1996	2051
<b>Citrus Grove Apartments</b> 1120 North Lemon Street Orange, CA 92867	Family	56	1, 2, and 3	2010	2065
<b>Esplanade Street Apartments</b> 264-280 South Esplanade Street Orange, CA 92869	Family	27	1, 2, and 3	2001	2056
<b>Friendly Center**</b> 147 W Rose Avenue Orange, CA 92867	Family	8	1, 2, and 3	N/A	2021
<b>Garrison Apartments</b> 1725 West Katella Avenue Orange, CA 92867	Workforce Housing	94	0, 1, and 2	2021	2051
<b>Harmony Creek Senior Apartments</b> 1616 East Rock Creek Drive Orange, CA 92866	Elderly	41	1, 2, and 3	1997	2052
<b>Hoover Avenue Apartments I</b> 108-118 West Hoover Avenue Orange, CA 92867	Family	20	1, 2, and 3	2006	2071
<b>Hoover Avenue Apartments II</b> 218-228 West Hoover Avenue Orange, CA 92867	Family	20	1, 2, and 3	2007	2072
<b>Huang, Yu Ming</b> 191 N. Parker Street; 628 & 642 W. Maple Avenue, Orange, CA 92868	Family	2	1, 2, and 3	1991	In Perpetuity
<b>The Knolls/Villa Santiago</b> 3138 East Maple Avenue Orange, CA 92869	Family	258	1	1996	2046
<b>Lemon Grove Apartments</b> 1148 North Lemon Street Orange, CA 92867	Family	81	1, 2, and 3	2017	2072
<b>Lemon Street Apartments</b> 481-491 Lemon Street Orange, CA 92866	Family	6	1, 2, and 3	2001	2056
<b>OHDC/Orange Rotary Senior Plaza</b> 235 West La Veta Avenue Orange, CA 92866 (nonprofit)	Elderly	6	1, 2, and 3	2004	2059
<b>Orange Garden Apartments</b> 1931, 1941, & 2003 East Quincy Avenue Orange, CA 92867	Family	24	1, 2, and 3	1997	2052
<b>Orchid Gardens</b> 1051 N. Glassell Street Orange, CA 92866	Elderly	17	1, 2, and 3	1989	In Perpetuity
<b>Parker Apartments</b> 161 North Parker Street Orange, CA 92868	Family	2	1, 2, and 3	1995	2050
<b>Pixley Arms</b> 537 West Almond Avenue Orange, CA 92866	Elderly	15	1, 2, and 3	1995	In Perpetuity
<b>Plaza Garden Apartments</b>	Family	56	1, 2, and 3	1997	2052



**Table 3-38: Affordable Housing Units in Orange with Covenants and Deed Restrictions**

Project Name/Address	Tenant Type	Number of Assisted Unit	Number of Bedrooms	Starting Years of Restriction	Ending Year of Restriction
1907, 1935, 1943, & 2003 East Monroe Avenue 1934, 1942, & 2002 East Quincy Avenue Orange, CA 92867					
<b>Rose Avenue Apartments</b> 1743 East Rose Avenue Orange, CA 92867	Family	6	1, 2, and 3	1998	2053
<b>Serrano Woods</b> 1820 East Meats Avenue Orange, CA 92865	Family	62	1, 2, and 3	2013	2068
<b>Stonegate Senior Apartments</b> 170 North Prospect Street Orange, CA 92869	Elderly	20	1, 2, and 3	2004	2059
<b>Villa Modena Apartments</b> 4431 East Marmon Avenue Orange, CA 92869	Family	5	1, 2, and 3	2001	2056
<b>Walnut Court</b> 1519 East Walnut Avenue Orange, CA 92867	Family	7	1, 2, and 3	1995	In Perpetuity
<b>Walnut-Pixley</b> 1519 E Walnut Avenue Orange, CA 92867	Family	22	1, 2, and 3	N/A	2049
<b>Wilson Avenue Apartments I</b> 1924 & 1934 East Wilson Avenue Orange, CA 92867	Family	20	1, 2, and 3	2001	2056
<b>Wilson Avenue Apartments II</b> 1844 East Wilson Avenue Orange, CA 92867	Family	10	1, 2, and 3	2004	2069
<b>Wilson Avenue Apartments III</b> 1944 East Wilson Avenue Orange, CA 92867	Family	10	1, 2, and 3	2007	2062
*Casas Del Rio's current affordability is tied to their loan which terminates in 2028; however, their mission is to preserve the affordability of the units in perpetuity					
**The Friendly Center intends to take action to maintain its affordable housing component through Section 8 in 2022.					
Source: City of Orange, Affordable Housing Resource Toolkit, Affordable Housing Compliance List, Accessed April 2021.					

### Cost of Preservation of Units

There are many options to preserving units, including providing financial incentives to project owners to extend lower income use restrictions, purchasing affordable housing units by a non-profit or public agency, or providing local subsidies to offset the difference between the affordable and market rate units. The strategy considered below is to assist affordable housing projects in maintaining rental subsidy for residents of the three units at-risk in Adams Triplex I, 8 units at the Friendly Center, and 40 units in Casas Del Rio. To determine the subsidy needed, Fair Market Rents were compared to market rate rents.



**Table 3-39: Estimated Monthly Subsidy to Preserve “At-Risk” Units**

Unit Size	Monthly Rents		Number of Units At-Risk	Difference	Monthly Subsidy	Annual Subsidy
	Fair Market Rents <sup>1</sup>	Market Rate <sup>2</sup>				
Efficiency	\$1,716	\$2,297	0	\$581	--	--
1-Bedroom	\$1,905	\$2,422	31 <sup>3</sup>	\$517	\$16,027	\$192,324
2-Bedroom	\$2,324	\$2,989	20 <sup>3</sup>	\$665	\$13,300	\$159,600
3-Bedroom	\$3,178	\$3,414	0	\$236	--	--
4-Bedroom	\$3,674	N/A	0	--	--	--
					<b>TOTAL</b>	<b>\$351,924</b>

*Source:*

- HUD FY 2022 Fair Market Rent Documentation System – Santa Ana-Anaheim-Irvine, CA HUD Metro FMR Area FMRs
- Kimley-Horn and Associate Analysis – based on apartments listed for rent across 20 properties on October 4, 2021.
- Adams Triplex I at-risk units are assumed one-bedroom units. Casas Del Rio at-risk units are assumed at 20 one-bedroom units and 20 two-bedroom units. Friendly Center at-risk units are assumed at 8 one-bedroom units.

### Cost of Replacement of Units

The City of Orange can also consider the cost of replacing the units with new construction. Construction cost estimates include all hard and soft costs associated with construction in addition to per unit land costs. Square footage estimates are based on estimated size of units to be replaced and assume housing units are developed on multi-family zoned properties. Land costs have been determined on a per unit basis.

**Table 3-40: Replacement Cost by Unit Type**

Size of Unit	Cost Per Square Foot <sup>1</sup>	Average Square Foot/Unit <sup>2</sup>	Replacement Cost/Unit <sup>3</sup>	Number of Units	Total Replacement Cost	
Efficiency	\$131.24	566	\$74,282	0	--	
1-Bedroom	\$131.24	760	\$99,742	31 <sup>3</sup>	3,092,014	
2-Bedroom	\$131.24	1,106	\$145,151	20 <sup>3</sup>	2,903,029	
3-Bedroom	\$131.24	1,335	\$175,205	0	--	
4-Bedroom	\$131.24	N/A	--	0	--	
					<b>TOTAL</b>	<b>\$5,995,043</b>

*Source:*

- International Code Council – August 2020 Report.
- Kimley-Horn and Associate Analysis – based on apartments listed for rent across 20 properties on October 4, 2021. Includes financing and land acquisition costs of \$30,000 per unit.
- Adams Triplex I at-risk units are assumed one-bedroom units. Casas Del Rio at-risk units are assumed at 20 one-bedroom units and 20 two-bedroom units. Friendly Center at-risk units are assumed at 8 one-bedroom units.

### Resources to Preserve At-Risk Units

A variety of programs exist to help cities acquire, replace, or subsidize at-risk affordable housing units. The following summarizes financial resources available:

- Community Development Block Grant (CDBG)** – CDBG funds are awarded to cities on a formula basis for housing activities. The primary objective of the CDBG program is the development of viable communities through the provision of decent housing, a suitable living environment and economic opportunity for principally low- and moderate-income persons. Eligible activities



include administration, fair housing, energy conservation and renewable energy sources, assistance for economic development, public facilities and improvements and public services.

- **HOME Investment Partnership** – Local jurisdiction can receive funds by formula from the Department of Housing and Urban Development (HUD) to increase the supply of decent, safe, sanitary, and affordable housing to lower income households. Eligible activities include housing acquisition, rehabilitation, and development, homebuyer assistance, and rental assistance.
- **Section 8 Rental Assistance Program** – The Section 8 Rental Assistance Program provides rental assistance payments to owners of private, market rate units on behalf of very low-income tenants, senior citizens, disabled and/or handicapped persons, and other individuals for securing affordable housing.
- **Section 202/811 Program** – Non-profit and consumer cooperatives can receive no-interest capital advances from HUD under the Section 202 program for the construction of very low-income rental housing with the availability of supportive services for seniors and persons with disabilities. These funds can be used in conjunction with Section 811, which can be used to develop group homes, independent living facilities and immediate care facilities. The capital advance funding can also provide project rental assistance for the properties developed using the funds. Eligible activities include acquisition, rehabilitation, new construction, and rental assistance.
- **California Housing Finance Agency (CalHFA) Multifamily Programs** – CalHFA’s Multifamily Programs provide permanent financing for the acquisition, rehabilitation, and preservation of new construction of rental housing that includes affordable rents for low- and moderate-income families and individuals. One of the programs is the Preservation Loan program which provides acquisition/rehabilitation and permanent loan financing designed to preserve or increase the affordability status of existing multifamily housing projects.
- **Low-Income Housing Tax Credit (LIHTC)** – This program provides tax credits to individuals and corporations that invest in low-income rental housing. Tax credits are sold to those with high tax liability and proceeds are used to create housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.
- **California Community Reinvestment Corporation (CCRC)** – The California Community Reinvestment Corporation is a multifamily affordable housing lender whose mission is to increase the availability of affordable housing for low-income families, seniors, and residents with special needs by facilitating private capital flow from its investors for debt and equity to developers of affordable housing. Eligible activities include new construction, rehabilitation, and acquisition of properties.

### Qualified Entities to Preserve

The following organizations have the experience and capacity to potentially assist in preserving at-risk units:

- Orange Housing Development Corporation
- Orange Senior Housing
- Jamboree Housing Corporation
- Irvine Housing Opportunities, Inc.
- Bridge Housing Corporation
- The Irvine Company
- Orange County Housing Authority
- Housing Corporation of America



- Southern California Housing Development Corporation
- Century Housing

### Quantified Objectives

Housing Element law requires that cities establish the maximum number of units that can be preserved over the planning period. The City's objective is to preserve the 3 affordable housing units "at-risk" of converting to market rate through policy programs provided in **Section 4: Housing Plan**.

### Senate Bill 330

Effective January 1, 2020, Senate Bill 330 (SB 330) aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. Under this legislation, municipal and county agencies are restricted in ordinances and polices that can be applied to residential development. The revised definition of "Housing Development" now contains residential projects of two or more units, mixed-use projects (with two-thirds of the floor area designated for residential use), transitional, supportive, and emergency housing projects. SB 330 sets a temporary 5-year prohibition of residential density reduction associated with a "housing development project", from January 1, 2020, to January 1, 2025. For example, during this temporary prohibition, a residential triplex cannot be demolished and replaced with a duplex as this would be a net loss of one unit.

None of the housing strategy sites contain significant existing housing with low-income tenants who will be displaced if the sites redevelop. To the extent that there is existing housing, all housing must be replaced under SB 330's replacement housing provisions (Government Code Section 66300). SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted just cause eviction provisions and statewide rent control to protect tenants from displacement. The City is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement.

## 5. Local Knowledge and Data Relating to Fair housing

During the 1960s and 1970s socio-economic disadvantaged areas of the City were "up-zoned" in a manner that supported multi-family development that does not live up to today's standards of quality and functionality. These areas generally tend to be along the State Route 55 corridor (east of Tustin and west of the freeway), in the El Modena neighborhood, the Cypress Barrio neighborhood, the Hoover-Wilson neighborhood south of Katella east of the railroad tracks and west of Glassell Street, and the Chalynn neighborhood generally located north of LaVeta, west of Cambridge, south of Culver, and east of Shaffer. Some of these areas were originally developed with single family residences. As redevelopment occurred with multi-family projects developed in a spotty manner, the overall quality and character of the neighborhoods deteriorated as a result of lower quality design and absentee landlords. Over the course of time, properties in these areas have experienced inconsistent maintenance and while some are in good condition, others are less well maintained. The City has a well-established working relationship with the local CHODO, Orange Housing Development Corporation (OHDC), and over the years has supported



OHDC's efforts to acquire multi-family properties in disadvantaged areas with higher minority populations. The subject properties are then rehabilitated, become well-managed and maintained by OHDC, and become income-restricted units. These projects have a proven track record of success. Support for this collaboration has come from different City sources, including some former Redevelopment Agency funding, CDBG, HOME funds, and other similar housing rehabilitation funding.

In addition to this OHDC collaboration for unit rehabilitation, the City has supported OHDC's development of new income-restricted multi-family projects in various disadvantaged areas of Orange. There are multiple highly successful projects that have come to fruition in this manner; two are on sites that had previously been developed with light industrial use, one involves a site that had been underutilized church property, one involves a site that had been surplus property left vacant after a road widening project, and another is presently under development on a portion of the City's corporation yard in proximity to the first two mentioned sites. There are a number of other OHDC projects in areas of the City that are not necessarily characterized as "low resource", however much of the City's population is characterized as modest, working-class households so the distribution of these projects has functioned to support the quality of the neighborhood environment for all.

Lastly, the City spends CDBG funds annually on public facility improvements in disadvantaged areas within Orange including sidewalk replacement, library building upgrades, and park/open space upgrades to contribute to a higher quality of life for residents.

## 6. Assessment of Contributing Factors to Fair Housing Issues in Orange

### Previously Identified Contributing Factors to Fair Housing

The AI identifies the following regional goals for mitigating impediments to fair housing within jurisdictions in Orange County:

- **Goal 1:** Increase the supply of affordable housing in high opportunity areas.
- **Goal 2:** Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, other seniors, and people with disabilities.
- **Goal 3:** Increase community integration for persons with disabilities.
- **Goal 4:** Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.
- **Goal 5:** Expand access to opportunity for protected classes

Within the Regional AI the City identified goals to address fair housing barriers and issue in the City of Orange, including the following:

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



- Prepare a Transfer of Development Rights Ordinance to provide opportunities for development rights transfers to accommodate higher density housing in transit and employment-rich areas of the city.
- Amend the City’s ADU Ordinance to be consistent with State Junior Accessory Dwelling Unit (JADU) and Accessory Dwelling Unit (ADU) laws.
- Prepare and adopt a Small Lot Subdivision ordinance to streamline entitlement processing of housing development projects.
- Continue providing CDBG funds to the Fair Housing Foundation to provide fair housing activities to the community.

### Current Local Contributing Factors

The Housing Element programs incorporates these recommended goals as they relate to Orange. The analysis above regarding other fair housing issues within Orange yielded the following results:

- **Educational Opportunities:** Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. Orange City, struggled with educational opportunity, all with scores in the 30s to 40s on the composite education index.
- **Environmental Opportunities:** Countywide, there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods. Orange City in one of the least environmentally healthy, with index scores in the 20s.
- **Economic Opportunities:** In Orange County, there are significant disparities in access to economic opportunity. Non-Hispanic White residents have the greatest access to economic opportunity. The City of Orange has relatively large disparities by protected class groups, where Hispanic residents have significantly lower access to economic opportunity than other racial/ethnic groups.
- **Regional Opportunity, Place:** The City of Orange has two of census tracts which provide low resources, specifically low housing, and civic life resources. These census tracts do not provide appropriate or sufficient housing access for current residents and therefore create fair housing barriers.

There are a number of factors and elements that contribute to and may cause fair housing issues. Some of these are historical and referenced in the preceding section on local knowledge and data. The following lists contributing factors identified in the City of Orange:

Fair Housing Outreach and Enforcement – The City of Orange partners with the Fair Housing Foundation to assist households with fair housing-related issues, as well as provide informational resources to the community. The City currently allocated \$24,522 to the Fair Housing Foundation to assist approximately 150 families. In 2019, the City assisted 161 residents; however, 16 fair housing complaints were filed involving housing discrimination in the City. Continued outreach including the availability of resources is necessary to ensure fair practices throughout the City. Fair housing is addressed through Housing Policy Action 4A, 4C, and 3D.



## K. Analysis of Sites Pursuant to AB 686

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in Appendix B), but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. **Figures 3-16** through **3-21** below identify the sites to accommodate future housing, as identified in the adequate sites analysis, overlaid on demographic data using the 2018 American Community Survey 5-year Estimates.

- **Figure 3-16** – Candidate Sites – Ethnicity Analysis, 2018
- **Figure 3-17** – Candidate Sites – Non-White Analysis, 2018
- **Figure 3-18** – Candidate Sites – Low/Moderate Income Block Group Analysis
- **Figure 3-19** – Candidate Sites – R/ECAP Areas
- **Figure 3-20** – Candidate Sites – RCAAs Areas
- **Figure 3-21** – Candidate Sites – TCAC Opportunity Areas

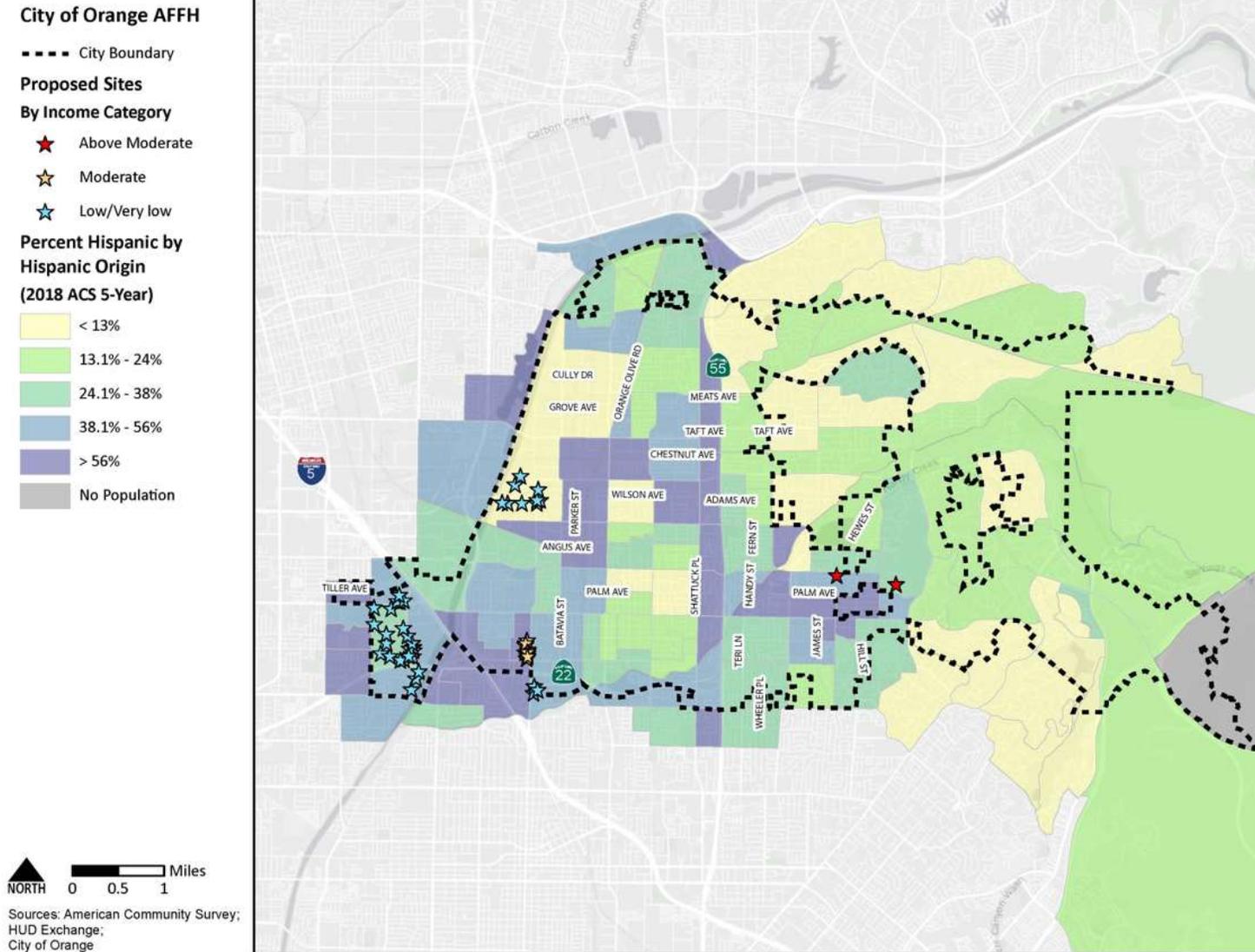
**Figure 3-24** shows the proposed candidate sites to meet the RHNA, at all income levels for Orange in relation to the location of residents of Hispanic origin. These sites take into consideration access to vital goods, services, and public transportation and are therefore ideal areas for the City to focus much of its future housing growth. It is anticipated that accessory dwelling unit (ADU) growth, including growth for affordable ADUs, will occur in the less dense areas of the community.

**Figure 3-24** shows the following findings:

- 9 proposed sites accommodate the RHNA allocation (totaling 114 potential units, or 2% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic greater than 56 percent. Of these, none are affordable to low and very low-income groups.
- 11 proposed sites to accommodate the RHNA allocation (totaling 1,334 potential units, or 21% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 38 and 56 percent. Of these, 323 proposed units are affordable to low and very low-income groups.
- 18 proposed sites to accommodate the RHNA allocation (totaling 2,567 potential units, or 40% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic between 24 and 38 percent. Of these, 621 proposed units are affordable to low and very low-income groups.
- 0 proposed sites to accommodate the RHNA allocation are located within block groups that have a percentage of the population that identifies as Hispanic between 13 and 24 percent.
- 9 proposed sites to accommodate the RHNA allocation (totaling 2,470 potential units, or 38% of the total potential units) are located within block groups that have a percentage of the population that identifies as Hispanic below 13 percent. Of these, 615 proposed units are affordable to low and very low-income households.



Figure 3-24: Candidate Sites – Ethnicity Analysis





**Figure 3-25** shows the proposed candidate sites to meet the RHNA, at all income levels, for Orange in relation with census data showing the percentage of the population within each block group that is Non-White.

**Figure 3-25** shows the following findings:

- 26 proposed sites accommodate the RHNA allocation (totaling 2,626 potential units, or 40% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White greater than 40 percent. Of these, 621 are affordable to low and very low-income groups.
- 12 proposed sites to accommodate the RHNA allocation (totaling 2,917 potential units, or 45% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 29 and 40 percent. Of these, 726 proposed units are affordable to low and very low-income groups.
- 4 proposed sites to accommodate the RHNA allocation (totaling 375 potential units, or 6% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 24 and 29 percent. Of these, 92 proposed units are affordable to low and very low-income groups.
- 5 proposed sites to accommodate the RHNA allocation (totaling 567 potential units, or 9% of the total potential units) are located within block groups that have a percentage of the population that identifies as Non-White between 15 and 24 percent. Of these, 120 proposed units are affordable to low and very low-income households.
- 0 proposed sites to accommodate the RHNA allocation are located within block groups that have a percentage of the population that identifies as Non-White below 15 percent.

The data shows that the proposed candidate sites to meet the RHNA allocation are dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. Sites are identified based on availability of land and realistic potential for future residential development. While Figure 3-17 identifies 40 percent of sites in block groups with more than 40 percent Non-White population and 45 percent of sites in block groups with 29 to 40 percent Non-White population, these sites may provide for future affordable housing to existing lower income residents without resulting in community displacement. Future developments may also bring about additional community resources and services to existing neighborhoods and communities. The City recognizes the larger percentage of sites identified within these areas and is committed to providing resources to facilitating appropriate development and facilitating improved access to resources and opportunities for existing and future residents. Housing Policy Actions 1E, 2B, 2G, 2M, 3A, 3D, and 4A all provide actions which seek to facilitate affordable housing development, outreach to the community, partner with community organizations and affordable housing developers, as well as identify funding sources for household assistance and housing development.



Figure 3-25: Candidate Sites – Non-White Analysis

**City of Orange AFFH**

--- City Boundary

**Proposed Sites**

**By Income Category**

★ Above Moderate

☆ Moderate

★ Low/Very low

**Percent Non-White by Race**

(2018 ACS 5-Year)

< 15%

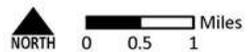
15.1% - 24%

24.1% - 29%

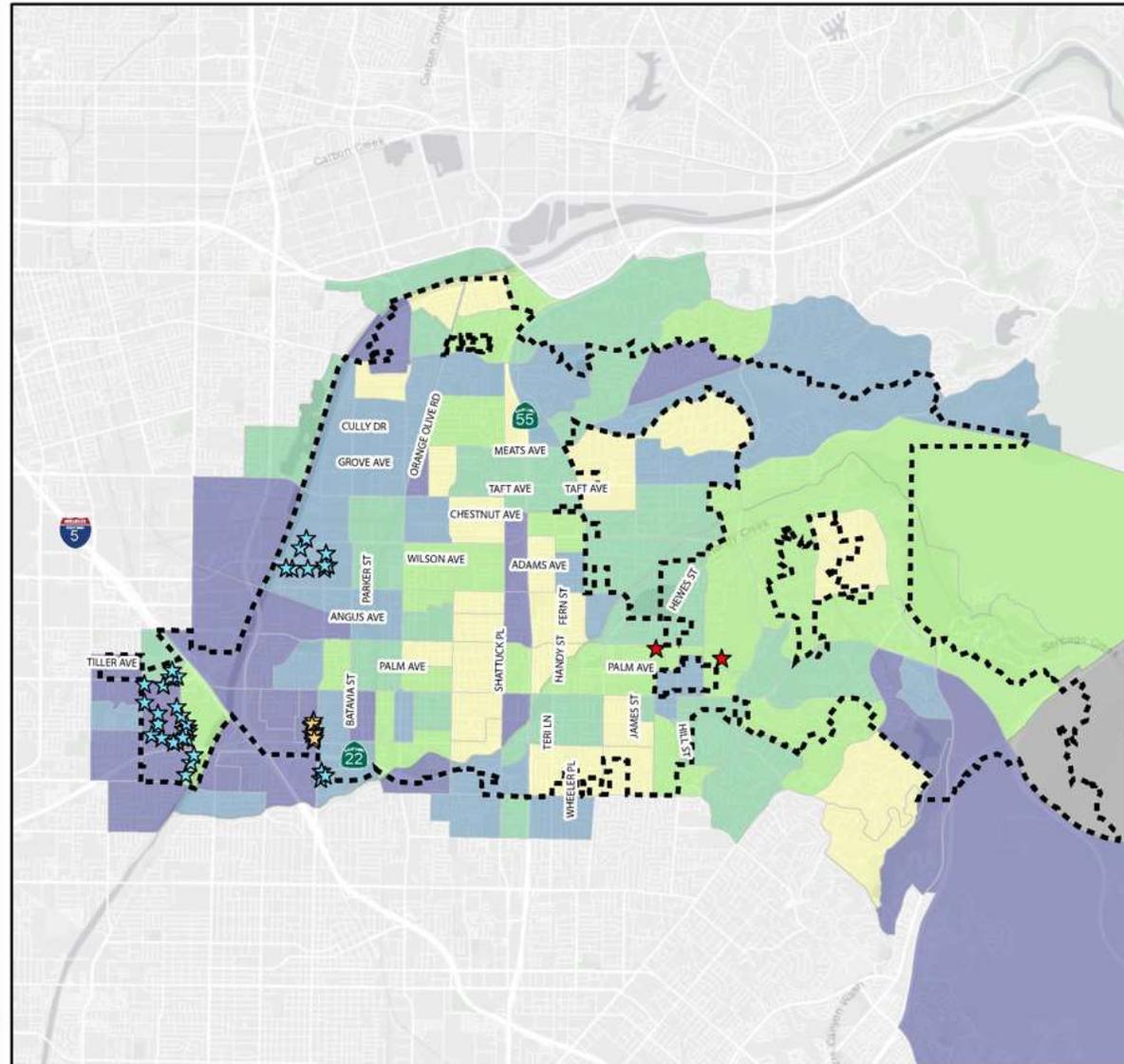
29.1% - 40%

> 40%

No Population



Sources: American Community Survey;  
HUD Exchange;  
City of Orange





**Figure 3-26** shows the location of proposed candidate sites to meet the City’s RHNA allocation in comparison with census dating showing Low/Moderate Income (LMI) block groups within the City of Orange. **Figure 3-26** displays the following results:

- 4 proposed sites accommodate the RHNA allocation (totaling 375 potential units, or 6% of the total potential units) are located within block groups that have a percentage of the population that is low- and moderate-income greater than 73 percent. Of these, 92 are affordable to low and very low-income groups.
- 21 proposed sites to accommodate the RHNA allocation (totaling 2,985 potential units, or 46% of the total potential units) are located within block groups that have a percentage of the population that is low- and moderate-income between 54 and 73 percent. Of these, 732 proposed units are affordable to low and very low-income groups.
- 10 proposed sites to accommodate the RHNA allocation (totaling 169 potential units, or 3% of the total potential units) are located within block groups that have a percentage of the population that is low- and moderate-income between 27 and 54 percent. Of these, 0 proposed units are affordable to low and very low-income groups.
- 12 proposed sites to accommodate the RHNA allocation (totaling 2,956 potential units, or 46% of the total potential units) are located within block groups that have a percentage of the population that is low- and moderate-income below 25 percent. Of these, 735 proposed units are affordable to low and very low-income households.

The data shows that the proposed candidate sites to meet RHNA allocation are evenly dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. The distribution of potential units provides increased opportunities for low income housing in areas with higher rates of low-income persons.



**Figure 3-26: Candidate Sites – Low/Moderate Income Block Group Analysis**

**City of Orange AFFH**

----- City Boundary

**Proposed Sites**

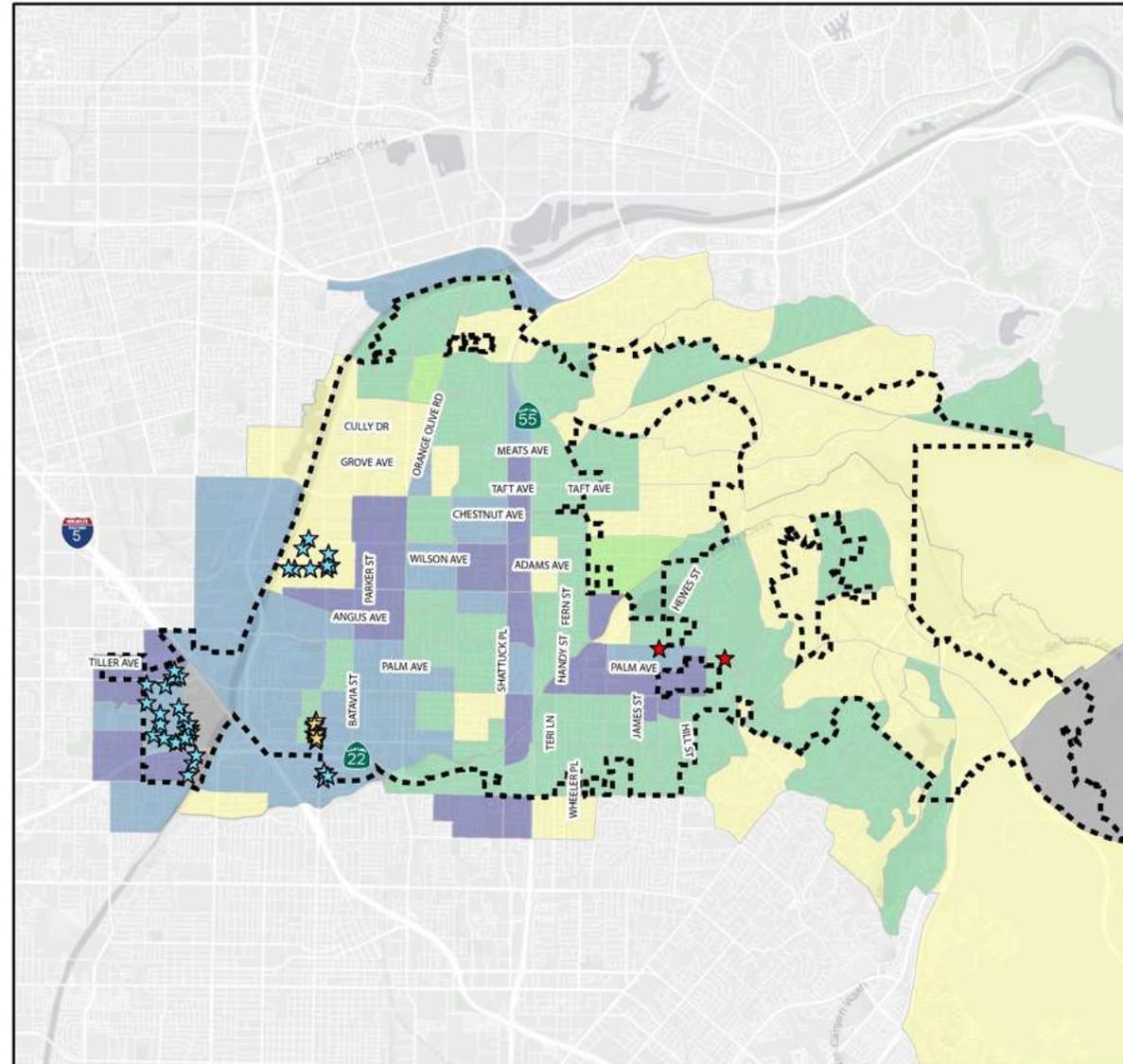
**By Income Category**

- ★ Above Moderate
- ☆ Moderate
- ★ Low/Very low

**Percent Low- and Moderate-Income Persons**

(2015 ACS 5-Year)

- < 25%
- 25.1% - 27%
- 27.1% - 54%
- 54.1% - 73%
- > 73%
- No Data



**NORTH** 0 0.5 1 Miles

Sources: American Community Survey;  
HUD Exchange;  
City of Orange



**Figure 3-27** shows proposed candidate sites to meet RHNA for Orange in relation with data showing R/ECAP areas within the City. R/ECAPs are racially or ethnically concentrated areas of poverty; they are marked in red hatchings. The goal of the AB 686 analysis is to analyze how the sites identified to accommodate the RHNA allocation may exacerbate or mitigate existing fair housing issues. **Figure 3-27** shows there are no R/ECAPs located within the City of Orange; therefore, no proposed candidate sites are located in a R/ECAP.

**Figure 3-28** shows proposed candidate sites to meet RHNA for Orange in relation with data showing RCAA areas within the City. RCAAs are racially or ethnically concentrated areas of affluence; there are identified as areas with a median household income greater than \$125,000 and a White population greater than 80 percent. **Figure 3-28** shows there are no RCAAs located within the City of Orange; therefore, no proposed candidate sites are located in an RCAA.

**Figure 3-29** shows proposed candidate sites to meet RHNA for Orange in relation with the TCAC/HCD Opportunity areas within the City. TCAC is the California Tax Credit Allocation Committee/Housing and Community Development Opportunity Area Maps which show how resources are spatially distributed throughout the City.

**Figure 3-29** shows the following findings:

- 33 proposed site to accommodate the RHNA allocation (totaling 5,843 potential units, or 90% of the total potential units) are located within the Low Resource areas. Of these, 1,448 are affordable to low and very low-income groups.
- 14 proposed site to accommodate the RHNA allocation (totaling 642 potential units, or 10% of the total potential units) are located within the Moderate Resource areas. Of these, 1,448 are affordable to low and very low-income groups.



Figure 3-27: Candidate Sites – R/ECAP Areas

**City of Orange AFFH**

--- City Boundary

**Proposed Sites**

**By Income Category**

★ Above Moderate

★ Moderate

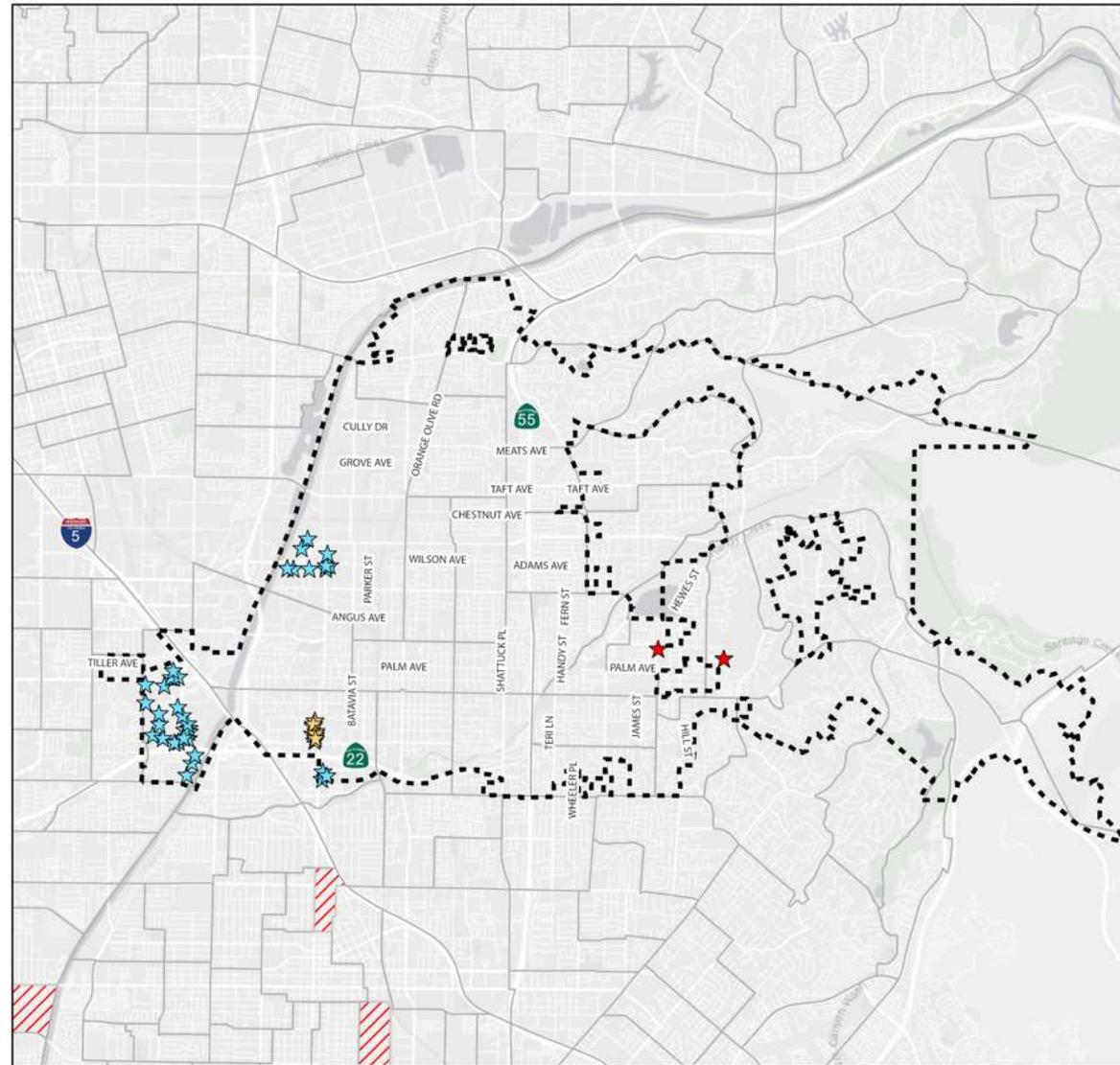
★ Low/Very low

**Racially/Ethnically Concentrated Areas of Poverty**

HUD, 2009 - 2013 by Census Tract

□ 0 - Not a R/ECAP

▨ 1 - R/ECAP

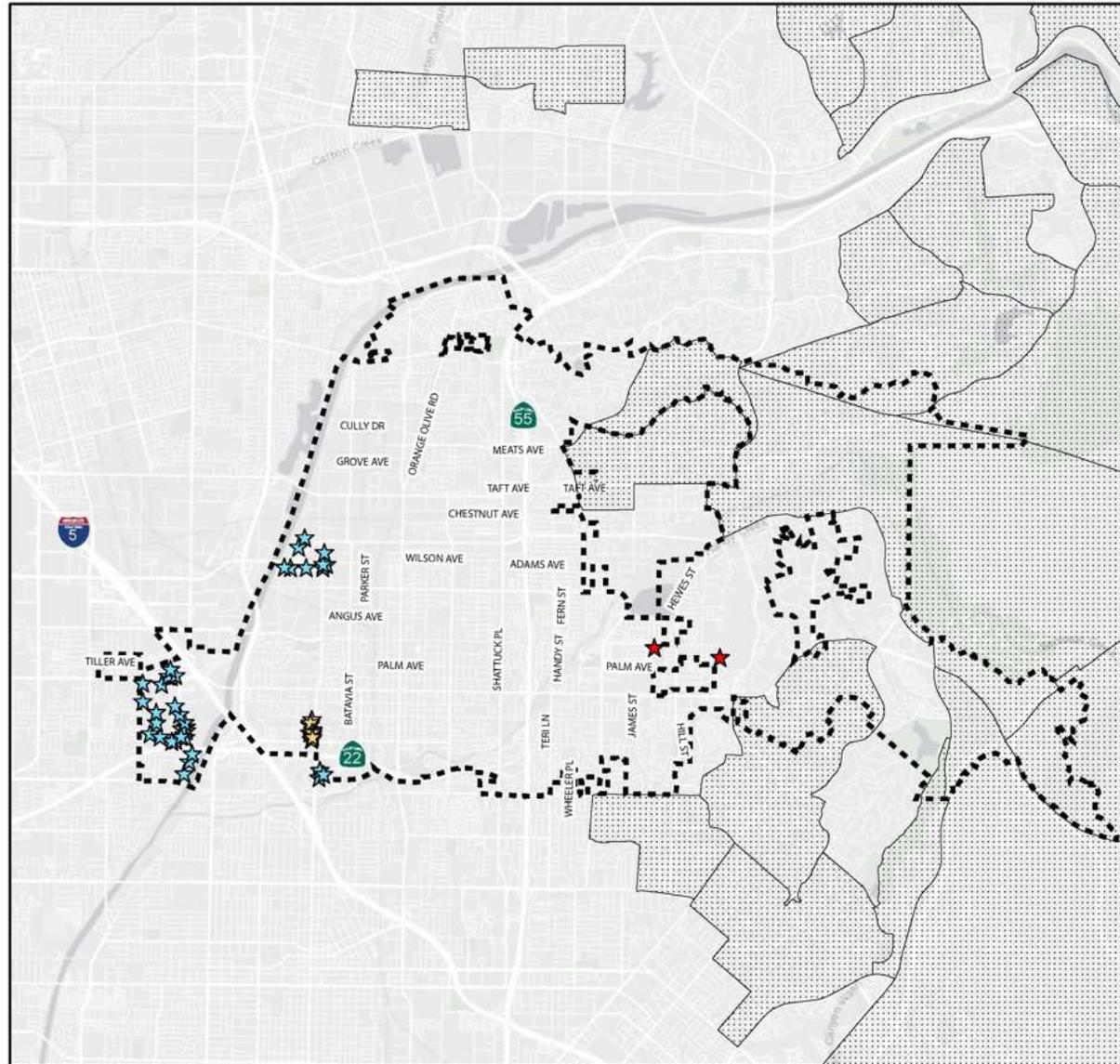


 NORTH  
 Miles  
 Sources: American Community Survey;  
 HUD Exchange;  
 City of Orange



Figure 3-28: Candidate Sites – RCAA Areas

- City of Orange AFFH**
- City Boundary
- Proposed Sites**
- By Income Category**
- ★ Above Moderate
  - ☆ Moderate
  - ★ Low/Very low
- Racially Concentrated Areas of Affluence**
- Identified RCAA by Census Tract
  - Median Household Income ≥ \$125,000
  - White Non-Hispanic Population ≥ 80 Percent



NORTH 0 0.5 1 Miles

Sources: American Community Survey;  
HUD Exchange;  
City of Orange





## L. Analysis of Fair Housing Priorities and Goals

To enhance mobility and promote inclusion for protected classes, the chief strategy included in this Housing Element is to provide sites suitable for affordable housing in high-resource, high opportunity areas, as demonstrated by the analysis of the housing resource sites contained in Appendix B of this Housing Element. Other programs that affirmatively further fair housing and implement the AI's recommendations include:

- **Housing Policy Action 1B:** Monitoring and Preservation of “At-Risk” units
- **Housing Policy Action 2B:** Promotion of Affordable Housing
- **Housing Policy Action 2C:** Development of Housing for Large Families
- **Housing Policy Action 2D:** Provision of Senior Housing Opportunities
- **Housing Policy Action 4A:** Affirmatively Further Fair Housing
- **Housing Policy Action 4B:** Homeless Services
- **Housing Policy Action 4C:** Support Fair Housing Services
- **Housing Policy Action 4D:** Section 8 Rental Assistance
- **Housing Policy Action 4E:** Support for Persons with Developmental Disabilities
- **Housing Policy Action 4F:** Emergency, Transitional and Supportive Housing and Lower Barrier Navigation Centers

**Table 3-40** provides a summary of fair housing issues identified through this Housing Element and programs included in the **Housing Plan** that address each.



**Table 3-40: Affirmatively Furthering Fair Housing Programs Matrix**

Fair Housing Issue	Contributing Factors	Priority	Programs
Opportunity Areas	<ol style="list-style-type: none"> <li>1. Census tracts with “Low Resource” TCAC Opportunity Areas</li> <li>2. Four census tracts with “Less Positive Education Outcomes”</li> <li>3. Four census tracts with “Less Positive Economic Outcomes”</li> </ol>	High	<p><b>Housing Policy Action 1E: Blight Removal on Public Property</b> – The City will continue to utilize the Public Works and Community Services Departments for the as-needed removal of graffiti and other deferred maintenance issues on public property, including sidewalks, parks, bus shelters signs and other structures adjacent to the public right-of-way, to enhance the quality of Orange’s residential neighborhoods.</p> <p><b>Housing Policy Action 3A: Public Education</b> – Provide public information related to housing development and how the provisions of affordable housing benefits the community.</p> <p><b>Housing Policy Action 3D: Community Outreach</b> – The City will continue gathering community input on affordable housing, housing for special needs populations, and ADUs. The continued outreach will be City-wide with a focus on traditionally under-represented communities.</p> <p><b>Housing Policy Action 4A: Affirmatively Further Fair Housing</b> – The City will implement the following goals:</p> <ul style="list-style-type: none"> <li>• Continue to follow current State Density Bonus law and further its implementation through a Density Bonus ordinance update.</li> </ul>



**Table 3-40: Affirmatively Furthering Fair Housing Programs Matrix**

Fair Housing Issue	Contributing Factors	Priority	Programs
			<ul style="list-style-type: none"> <li>• Prepare a Transfer of Development Rights Ordinance to provide opportunities for development rights transfers to accommodate higher density housing in transit and employment-rich areas of the city.</li> <li>• Prepare and adopt a small lot subdivision ordinance to streamline entitlement processing of housing development projects.</li> <li>• Continue providing CDBG funds to the Fair Housing Foundation to provide fair housing activities to the community.</li> </ul>
Environmental Burdens	<ol style="list-style-type: none"> <li>1. Very low HUD Environmental Health Index scores for all races and ethnicities</li> <li>2. Areas of moderate to high CalEnviroScreen 4.0 environmental burdens</li> </ol>		<p><b>Housing Policy Action 1E: Blight Removal on Public Property</b> – The City will continue to utilize the Public Works and Community Services Departments for the as-needed removal of graffiti and other deferred maintenance issues on public property, including sidewalks, parks, bus shelters signs and other structures adjacent to the public right-of-way, to enhance the quality of Orange’s residential neighborhoods.</p> <p><b>Housing Policy Action 3C: Safety Element Update and adoption of an Environmental Justice Element</b> – The City will review and update its Safety and</p>



**Table 3-40: Affirmatively Furthering Fair Housing Programs Matrix**

Fair Housing Issue	Contributing Factors	Priority	Programs
			<p>Environmental Justice Elements and related policies.</p> <p><b>Housing Policy Action 3D: Community Outreach</b> – The City will continue gathering community input on affordable housing, housing for special needs populations, and ADUs. The continued outreach will be City-wide with a focus on traditionally under-represented communities.</p> <p><b>Housing Policy Action 4A: Affirmatively Further Fair Housing</b> – The City will implement the following goals:</p> <ul style="list-style-type: none"> <li>• Prepare a Transfer of Development Rights Ordinance to provide opportunities for development rights transfers to accommodate higher density housing in transit and employment-rich areas of the city.</li> </ul>
Need for Affordable Housing in New Developments	<ol style="list-style-type: none"> <li>1. The City has six racially or ethnically concentrated areas of affluence</li> <li>2. Low Regional Opportunity Index scores for housing in 4 census tracts</li> <li>3. Areas of “Stable/Advanced Exclusivity”</li> <li>4. 51 units with affordability covenants at risk of converting to market-rate</li> </ol>		<p><b>Housing Policy Action 1B: Monitoring and Preservation of “At-Risk” Units</b> – The City will assist in preserving at-risk units by, but not limited to, supporting non-profit applications for funding to purchase at-risk units, work with property owners to maintain affordability and develop preservation strategies, and assist with funding when available.</p>



**Table 3-40: Affirmatively Furthering Fair Housing Programs Matrix**

Fair Housing Issue	Contributing Factors	Priority	Programs
			<p><b>Housing Policy Action 2G: Support Community Housing Development Organization New Construction Projects –</b>            The City will continue to seek qualified non-profit organizations for acquisition, construction and rehabilitation of affordable housing. Funds will be made available on an annual basis, contingent on funding availability.</p> <p><b>Housing Policy Action 2B: Promotion of Affordable Housing –</b> The City will continue to encourage through outreach to private and non-profit housing developers, the development of rental and for-sale housing for larger (5 or more persons) families. The City will support developers/builders that incorporate larger bedroom counts (3 or more bedrooms) to accommodate the needs of larger families and reduce incidents of overcrowding in the existing housing stock. The City will evaluate providing regulatory incentives such as density bonuses that encourage and support the development of housing for large families on a project-by-project basis.</p> <p><b>Housing Policy Action 2M: Development of Housing for Extremely Low and Lower-Income Households –</b> The City will develop a program to subsidize application processing fees, when funding is available, for qualifying developments</p>



**Table 3-40: Affirmatively Furthering Fair Housing Programs Matrix**

Fair Housing Issue	Contributing Factors	Priority	Programs
			<p>where all units affordable to 80% AMI or lower. The City will also promote the benefits of this program to the development community by posting information on its webpage and creating a handout to be distributed with land development applications.</p>

# Section 4: Housing Plan





# Housing Plan

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The Housing Plan describes the City of Orange 2021-2029 policy program. The Housing Plan describes the specific goals and policy actions to assist City decision makers to achieve the long-term housing objectives set forth in the Orange Housing Element. This Plan identifies goals and policy actions aimed at providing additional housing opportunities, addressing governmental constraints to affordable housing, improving the condition of existing housing, and providing fair housing opportunities for all residents.

## Regional Housing Needs Assessment

As described in previous sections of this Housing Element SCAG has conducted a RHNA to determine the City's share of the affordable housing needs for the Orange County region. The RHNA quantifies Orange local share housing needs for the region by income category. Income categories are based on the most current Median Family Income (MFI) for Orange County. The City's 2021-2029 RHNA growth need is as follows:

- 1,067 units - Very low income (0-50% County MFI)
  - 604 units - Low income (51-80% of County MFI)
  - 677 units - Moderate income (81-120% of County MFI)
  - 1,588 units - Above moderate income (120% or more of County MFI)
- 3,936 units - Total**

## A. Housing Goals

The City of Orange has identified the following housing goals as part of this Housing Element Update:

**Housing Goal #1:** High quality neighborhoods and housing stock.

**Housing Goal #2:** Accommodate Orange's RHNA Allocation at all income levels.

**Housing Goal #3:** Effective maintenance, preservation, improvement and development of housing citywide.

**Housing Goal #4:** Equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin or color.

The goals listed above are described below and on following pages with accompanying policy actions to achieve them.



## B. Housing Policy Actions

This Housing Element expresses the Orange community’s overall housing goals, supporting policy actions, and quantified objectives. The stated policy actions are based on a review of past performance of the prior Housing Element, analysis of current constraints and resources, requirements of State law, and input from Orange residents and stakeholders.

### **Housing Goal #1: High quality neighborhoods and housing stock.**

#### **Housing Policy Action 1A:** Acquisition/Rehabilitation of Multi-Family Residential Development

The City will identify and pursue potential financing sources, as well as identify and implement regulatory incentives and other in-kind technical assistance to non-profits, affordable housing developers and property owners for the rehabilitation/acquisition of multi-family properties for affordable housing which is subject to available funding sources annually. The City will work with property owners to determine the most appropriate method to maintain affordability of housing units through restriction and/or covenants and prioritize and target buildings that exhibit the highest levels of deferred maintenance.

#### **Objectives:**

- Annually identify and pursue funding sources, as well as adopt and implement regulatory incentives and technical assistance for property owners and housing developers.
- Annually outreach to property owners to collaborate in preserving affordable units at-risk of converting to market rate. The City will outreach to property owners whose deed restriction expires within the next three years to discuss an agreement to maintain the affordability of the units in question with final decision by the property owner.

**Timeframe:** Annually identify and pursue funding sources and additional incentives. Annually conduct outreach to property owners.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** State HCD, CDBG and HOME funds

#### **Housing Policy Action 1B:** Monitoring and Preservation of “At-Risk” Units

The City shall provide for regular monitoring of deed-restricted units that have the potential of converting to market-rate during the planning period. The City may provide technical assistance for owners of these units seeking funding and other opportunities to extend and/or renew deed restrictions and/or covenants. The City will assist in preserving at-risk units by, but not limited to, supporting non-profit applications for funding to purchase at-risk units, work with property owners to maintain affordability and develop preservation strategies, and assist with funding when available. The City will continue to comply with noticing requirements and coordinate with qualified entities to preserve at-risk units.

As shown in **Section 3**, the following properties are at-risk of converting to market-rate within the planning period:

- Three (3) units at Adams Triplex I (1837-1841 E. Adams) are identified as at-risk of converting to market rate units. These units are being preserved through the Section 8 Annual Renewal Program. The current contract runs through 2027.
- Eight (8) units at the Friendly Center (451-453 N. Lemon Street) are identified as at-risk of converting to market rate units. These units are being preserved through the Section 8 Annual Renewal Program. The current contract runs through May 2021. Discussions with the Friendly Center have resulted in an understanding that they intend to continually renew each year.



- Forty (40) units at Casas Del Rio (1740 E. La Veta Avenue) were at risk of converting in 2017. The owner obtained a new five-year Housing Assistance Payments (HAP) contract effective October 26, 2017 through October 26, 2022.

**Objectives:**

- Coordinate with property owners in identifying methods and funding sources to maintain the affordability of units at-risk of converting to market-rate.

**Timeframe:** Outreach and coordinate with property owners annually, or until affordability is maintained.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 1C:** Evaluation of Planning and Development Review Process

The City will conduct annual internal reviews of the planning and development review process. The City will look for opportunities to create efficiency in the review of residential projects to reduce the holding, development and labor costs assumed by the project applicant.

**Objectives:**

- Annual review of the planning and development review process.

**Timeframe:** Annual review; changes to be made within six months, as need identified.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 1D:** Proactive Code Enforcement

The City will continue to address code violations and deferred maintenance issues on a case-by-case basis, provide information on resources available and seek grants and other funding mechanisms for maintenance of existing neighborhoods.

**Objectives:**

- Maintain informational material(s) on the City’s website regarding code violations and resources for maintenance of existing neighborhoods.
- Seek grants and other funding mechanisms for maintenance of existing neighborhoods.
- Annually review the number and types of code violations and identify additional resources in areas demonstrating additional need through an increase in code enforcement cases year over year.

**Timeframe:** Maintain updated information online throughout the Planning Period and annually review code violations and seek funding opportunities.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund, CDBG

**Housing Policy Action 1E:** Blight Removal on Public Property

The City will continue to utilize the Public Works and Community Services Departments for the removal of graffiti and other deferred maintenance issues on public property, including sidewalks, parks, bus shelters signs and other structures adjacent to the public right-of-way, to enhance the quality of Orange’s residential neighborhoods.



**Objectives:**

- Maintain informational material(s) on the City’s website regarding City resources for public property maintenance.
- Annually review City-provided resources for graffiti and other deferred maintenance issues on public property, and if issues increase, identify and implement solutions and/or adopt new programs, including, but not limited to, changes to landscaping and streetscape, outreach to local residents or businesses, or increased security presence.

**Timeframe:** Maintain updated information online throughout the Planning Period; Annually review resources and implement new solutions or adopt new programs if additional issues arise.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 1F:** Preservation of Historic Residential Structures

The City places high priority to the conservation, preservation and enhancement of the City’s historic residential neighborhoods. The City will continue to implement the goals and objectives contained in the Cultural Resources and Historic Preservation Element of the General Plan, the Historic Preservation Design Standards for Old Towne, and the Orange Eichler Design Standards to promote the continued quality of the City’s historic residential resources and maintenance of the City’s existing housing stock. In addition, the City will continue to promote the Mills Act Program and create public information and outreach materials.

**Objectives:**

- Promote informational materials on historical preservation and the Mills Act Program on the City’s website and at City Hall. Provide materials at community outreach events.

**Timeframe:** Maintain updated information online throughout the Planning Period.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Goal #2:** Accommodate Orange’s RHNA Allocation at all income levels.

**Housing Policy Action 2A:** Annual Review of Housing Element

The City will continue to conduct an annual implementation review of the Housing Element consistent with HCD’s annual reporting requirements. The review includes the following information: a log of new residential development permits and completion reports; inventory of units built in the Extremely Low-, Very Low- and Low-Income categories, an update or inventory of approved projects; an annual estimate of population from the State Department of Finance; and available vacant land and zoning survey.

**Objectives:**

- Annually complete and submit the Annual Progress Report (APR) to HCD. Assess the Housing Element sites and programs every two years and, as needed, make revisions.

**Timeframe:** Annually complete and submit the City’s APR and adopt changes to the Housing Element sites and programs as necessary every two years if development does not occur as detailed within this Housing Element.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund



### **Housing Policy Action 2B:** Promotion of Affordable Housing

The City recognizes the need for housing affordable to all income segments of the population, especially Lower-Income households. The City will continue to support and encourage the development of housing affordable to Lower-Income households through incentives such as density bonuses a variety of incentives. Additionally, the City will continue to outreach to the development community, seek partnerships and provide in-kind assistance in developing new affordable housing.

#### **Objectives:**

- Annually outreach to and meet with the development community to promote the development of affordable housing and seek partnerships. The City has established a goal to develop 65 affordable housing units through partnerships and outreach.
- Continue to proactively build relationships with the building community, including nonprofits, and establish an array of regulatory and financial tools to assist residential development with a nonprofit, including utilizing funds available to the City such as former redevelopment agency set aside funds and other local financial resources, donating land, supporting funding applications, assisting entitlements and expediting permit processing.
- Adopt an amendment to the Density Bonus Ordinance in compliance with Government Code Section 65915 and develop an outreach program to ensure its successful implementation.
- Continue to pro-rate adjustments to ADUs over 800 square feet based on the level of impacts.
- Continue to provide reduced parking standards for senior housing developments and additional reductions when they include affordable units.

**Timeframe:** Annually outreach to and meet with the development community with target goal to develop 65 new affordable housing units over the 6<sup>th</sup> cycle.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

### **Housing Policy Action 2C:** Development of Housing for Large Families

The City will continue to encourage the development of rental and for-sale housing for larger (5 or more persons) families through outreach to private and non-profit housing developers. The City will support developers/builders that incorporate larger bedroom counts (3 or more bedrooms) to accommodate the needs of larger families and reduce incidents of overcrowding in the existing housing stock. The City will identify and adopt regulatory incentives, such as density bonuses, that encourage and support the development of housing for large families.

#### **Objectives:**

- Annually outreach to and meet with the development community to promote the development of units for large families and receive feedback on potential constraints or resources.
- Promote density bonuses to encourage and support the development of housing for large families.
- Identify and adopt regulatory incentives to encourage and support the development of housing for large families.

**Timeframe:** Annually outreach and meet with the development community; promote density bonuses on a project-by-project basis; identify and adopt regulatory incentives by December 2024.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund



#### **Housing Policy Action 2D:** Provision of Senior Housing Opportunities

The City recognizes the unique needs of its elderly residents and will continue to encourage, through regulatory incentives, the development of senior housing that offers a wide range of housing choices from independent living to assisted living with on-site services and memory care facilities. The City shall analyze the existing provisions in the Zoning Code and then identify and implement additional ability for regulatory relief.

#### **Objectives:**

- Annually outreach to and meet with the development community to promote the development of senior housing and receive feedback on potential constraints or resources.
- Evaluate the provisions of the Zoning Code and identify amendments to adopt that further incentivize the development of a variety of senior housing choices.

**Timeframe:** Annually outreach and meet with the development community; evaluate the Zoning Code for potential amendments by December 2023 and adopt by June 2024.

**Responsible Agency:** City of Orange Community Development Department

**Funding Sources:** General Fund

#### **Housing Policy Action 2E:** Facilitate Infill Construction

The City will encourage infill development within feasible development sites for homeownership and rental units. The City will continue to facilitate infill development through implementation of its General Plan and Zoning Code, allowing for higher density housing in appropriate areas of the City where potential exists for infill or site redevelopment and employment and transit are concentrated. The City will also encourage compatible residential development integrated into existing neighborhoods and districts where appropriate.

#### **Objectives:**

- Within 12 months of adoption of the Housing Element, the City shall evaluate the existing provisions in the Zoning Code for feasibility of providing additional regulatory relief (i.e., streamlined review, reduced and objective development standards, lot consolidation, and other methods deemed appropriate) to further encourage infill housing development.
- Identify and adopt an inventory of potential infill sites utilizing the site analysis found in Appendix B of the Housing Element.
- Seek partnerships with and provide informational material including a copy of the inventory and listing of City incentives and programs to housing developers.
- Monitor the development of infill candidate housing sites as it relates to the provision of housing affordable to lower-income households. If development does not occur as projected, the City will identify and adopt new incentives, actions, or additional sites to continue maintain compliance with Housing Element requirements for RHNA.
- 

**Timeframe:** Evaluate the Zoning Code by December 2023, and monitor and review candidate housing infill sites annually. Identify and adopt changes within 6 months of identifying a gap between projections and actual development occurring.

**Responsible Agency:** City of Orange Community Development Department

**Funding Sources:** General Fund



**Housing Policy Action 2F:** Pursue Alternative Funding and Financing Sources

The City will continue to use federal HOME Investment Partnerships Program (HOME) and Community Development Block Grant Program (CDBG) funds and pursue alternative funding and financing sources such as public-private partnerships in order to maximize the opportunities for new housing development.

**Objectives:**

- Seek out and pursue funding opportunities for new housing development.

**Timeframe:** Annually seek for and explore funding opportunities.

**Responsible Agency:** City of Orange Community Development Department

**Funding Sources:** Federal HOME Investment Partnership funds, Low and Moderate Income Housing Asset funds, Community Development Block Grant funds, and CalHome funds

**Housing Policy Action 2G:** Support Community Housing Development Organization New Construction Projects

Section 3.J.6 of this Housing Element lists resources and qualified entities to preserve affordable units at risk of converting to market-rate. The City will continue to seek qualified non-profit organizations for acquisition, construction and rehabilitation of affordable housing. Funds will be made available on an annual basis, contingent on funding availability.

**Objectives:**

- Partner with non-profit organizations for future affordable housing development and preservation of at-risk units.
- Promote available funding opportunities.

**Timeframe:** Annually outreach to non-profit organizations and annually maintain updated funding opportunities on the City's website.

**Responsible Agency:** City of Orange Community Development Department

**Funding Sources:** HOME funds

**Housing Policy Action 2H:** Monitoring Adequate Sites for Housing Development

The City will continue to require non-residential and mixed use projects in the Urban Mixed Use (UMU) zoning districts only be approved when a finding can be made that the project will not reduce UMU-zoned land available for residential development such that the City can no longer accommodate its remaining RHNA need. The City will continue to track the availability of UMU-zoned sites greater than one half-acre in size through its RHNA Housing Sites Monitoring System.

**Objectives:**

- Annually track development in the UMU zone and availability of sites.

**Timeframe:** Annually track non-residential and mixed-use development and availability of sites to maintain the City's ability to accommodate the remaining RHNA.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 2I:** Coordinate with Chapman University to Address Student Housing

The City will coordinate with Chapman University to respond to the housing needs of the growing student population and challenges relating to integration of student-oriented housing in existing residential neighborhoods. As part of



this effort, the City will encourage development of on-campus housing through the University's campus master planning process.

**Objectives:**

- Work with the Chapman University to undertake activities that may include, but are not limited to, surveying students to understand off-campus housing needs, identifying appropriate locations for and types of off-campus student housing, and establishing policies and procedures to address any issues with neighborhood integration.

**Timeframe:** Annually coordinate with Chapman University.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 2J:** Development of Accessory Dwelling Units

The City of Orange will continue to permit construction of accessory dwelling units consistent with State law. The City has incorporated new legislation regarding ADU development into the Municipal Code and will continue to make updates to the City's Municipal Code to reflect new State laws as required.

The City will develop an informational packet to be available to the public at City Hall. The packet will include processes and key information regarding ADU development opportunities. The City will continue to work with property owners who come forward with interest in developing ADUs and/or questions regarding ADUs.

**Objectives:**

- Update Municipal Code to permit ADUs and JADUs in all zones which allow residential uses and update Section 17.13.030 Permitted Uses table to clarify where ADUs and JADUs are permitted in compliance with State law.

**Timeframe:** Program feasibility analyzed within one year, with one additional year for implementation  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 2K:** Create Accessory Dwelling Unit and Junior Accessory Dwelling Unit Monitoring Program

The City will create a monitoring program to track ADU creation by RHNA affordability levels throughout the planning period. This will allow the City to monitor the development of accessory units at all income levels in relation to the anticipated development within the Housing Element. Additionally, the City will conduct an evaluation of ADU development within 2 years of the adoption of the 6<sup>th</sup> cycle Housing Element. If ADU development falls below what was assumed in the Housing Element, the City will take action within 6 months of completion of the ADU review to ensure that adequate capacity at each income level is maintained to meet the City's RHNA needs.

**Objectives:**

- Create a monitoring program to track ADU creation by RHNA affordability levels throughout the planning period.

**Timeframe:** Adopt Monitoring Program by December 2023, review conducted every two years during the planning period  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund



**Housing Policy Action 2L:** Candidate Sites Used in Previous Housing Elements

Pursuant to State Housing law, candidate sites identified in this Housing Element to accommodate a portion of the City’s low- and very low -income RHNA that were identified in previously adopted Housing Elements must be rezoned to allow residential use by right at specified densities for housing developments in which at least 20 percent of the units are affordable to lower income households. By right shall mean the jurisdiction may not require any of the following discretionary actions, except if the project requires a subdivision:

- A conditional use permit
- A planned unit development permit
- Other discretionary, local-government review or approval that would constitute a “project” as defined in Section 21100 of the Public Resources Code (California Environmental Quality Act “CEQA”).

The City may impose objective design review standards on projects. The City has identified as part of this Housing Element update vacant and nonvacant sites that were used in previous Housing Elements to meet the current RHNA need. To accommodate the provisions of State law, the City shall streamline development review for projects on all nonvacant sites included in a prior Housing Element and all vacant sites included in two or more consecutive planning periods that meet the requirements of State housing law. These sites are identified in **Appendix B**.

**Timeframe:** By December 2024.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 2M:** Development of Housing for Extremely Low and Lower-Income Households

The City recognizes the importance of supporting the development of housing for low and extremely low income households. While the City is not a developer, it is a primary goal of the Housing Element to support developers and increase the feasibility of development of housing for extremely low and low income households. Actions for this program include the following:

- The City will adopt a program to subsidize application processing fees, when funding is available, for qualifying developments where all units affordable to 80% AMI or lower.
- Promote the benefits of this program to the development community by posting information on its webpage and creating a handout to be distributed with land development applications.
- The City will annually invite nonprofit developers to discuss the city’s plans, resources, development opportunities, and requests-for-quotes.
- The City will assist in the application for state and federal financial resources.
- Promote the development of 535 units for extremely low income housing units throughout the planning period.

**Timeframe:** By December 2023; annually promote benefits of this program.  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Goal #3: Effective maintenance, preservation, improvement and development of housing citywide.**

**Housing Policy Action 3A:** Public Education

The City shall continue to provide the public information related to the development of housing through the continued promotion of educational materials. The information may describe incentives in the Orange Municipal Code that support the development of affordable housing and how the provisions of affordable housing benefits the community.



This may take the form of community newsletter articles, information posted on the City’s website that is available to the public, and staff available to respond to inquiries.

**Objectives:**

- Annually outreach to the community with information on affordable housing development.

**Timeframe:** Maintain updated information online and annually outreach to the community.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 3B:** Water and Sewer Purveyors

Pursuant to Chapter 727, Statutes of 2005 (SB 1087), the City of Orange is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers, including the City’s own water provider services, Metropolitan Water District (MWD) and the Orange County Sanitation District (OCSD). This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects.

Additionally, cooperation with local service providers will support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households. The City will submit the adopted Housing Element to local water and sewer service providers for their review and consideration when reviewing new residential projects.

**Objectives:**

- Deliver the adopted Housing Element to local water and sewer service providers.

**Timeframe:** Immediately upon adoption of the 6<sup>th</sup> Cycle Housing Element

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 3C:** Safety Element Update and adoption of an Environmental Justice Element

SB 1035 requires that the City, after the initial revision of the Safety Element to identify flood hazards and address the risk of fire in certain lands upon each revision of the Housing Element, review and, if necessary, revise the Safety Element to identify new information relating to flood and fire hazards that was not previously available during the previous revision of the Safety Element. The City is currently in the process of revising the Safety Element and will take the document to City Council for adoption within 12 months of adoption of the 6<sup>th</sup> Cycle Housing Element.

SB 1000 (2018) requires that the City include an environmental justice component to the General Plan during the 6<sup>th</sup> Cycle update of the City’s Housing Element. The City is currently planning to perform a review of the existing General Plan to determine where environmental justice is currently addressed and where additional language is needed within the appropriate elements. The City will modify the General Plan to include additional Environmental Justice policies within 24 months of adoption of the 6<sup>th</sup> Cycle Housing Element.

**Objectives:**

- Update the Safety and Environmental Justice Elements.

**Timeframe:** Safety Element Update [by June 2024](#), Environmental Justice policy update [by June 2024](#)

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 3D:** Community Outreach



The City has hosted workshops and public meetings throughout the 2021-2029 Housing Element Update to gather public input and feedback as it relates to development of and access to housing. The City will extend outreach efforts throughout the planning period to continue gathering community input on, but not limited to, affordable housing, housing for special needs populations, and ADUs. The continued outreach will be City-wide with a focus on traditionally under-represented communities.

**Objectives:**

- Annually outreach and host a community meeting to discuss housing.

<p><b>Timeframe:</b> A minimum of one meeting held annually <b>Responsible Agency:</b> City of Orange Community Development Department <b>Funding Source:</b> General Fund</p>
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**Housing Policy Action 3E:** Housing Rehabilitation Survey

In order to ensure the maintenance, preservation, and improvement of housing throughout the City, an estimate of the number of units in need of rehabilitation is necessary.

**Objectives:**

- Yearly implement and assess a survey of [the City's](#) housing stock to identify potential rehabilitation needs. Based on the results, the City shall [adopt](#) additional policy actions such as, but not limited to, promoting funding opportunities and community outreach and education on available resources.

<p><b>Timeframe:</b> Survey conducted annually; potential follow-up policy actions to be <a href="#">adopted</a> and <a href="#">implemented</a> within 6 months of identifying a need <b>Responsible Agency:</b> City of Orange Community Development Department <b>Funding Source:</b> General Fund</p>
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**Housing Goal #4: Equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin or color.**

**Housing Policy Action 4A:** Affirmatively Further Fair Housing

Pursuant to AB 686, the City will affirmatively further fair housing by taking meaningful actions in addition to resisting discrimination, that overcomes patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristic, as defined by California law.

The Housing Element contains analysis of regional and local contributing factors to fair housing issues within Orange and determined the following factors were applicable:

- **Educational Opportunities:** Countywide, there are disparities across racial/ethnic groups in access to educational opportunities as measured by the index. The City of Orange showed lower scores in educational opportunity, all with scores in the 30s to 40s on a scale of 100 for the composite education index, signifying low opportunity and resources.
- **Environmental Opportunities:** Countywide, there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution. Across all tracts in Orange County, non-Hispanic Whites exhibit the highest access to environmentally healthy neighborhoods. Orange City in one of the least environmentally healthy, with index scores in the 20s on a scale of 100 for the environmental opportunity index, signifying low opportunity and resources.



- **Economic Opportunities:** In Orange County, there are significant disparities in access to economic opportunity. Non-Hispanic White residents have the greatest access to economic opportunity. The City of Orange has relatively large disparities by protected class groups, where Hispanic residents have significantly lower access to economic opportunity (economic access includes job access and opportunity, and other economic upward mobility opportunities) than other racial/ethnic groups.
- **Regional Opportunity, Place:** The City of Orange has two census tracts which have low resources and are considered low access to opportunities for upward mobility of residents. Specifically, these areas have low opportunity for housing and civic life resources. These census tracts do not provide appropriate or sufficient housing access for current residents and therefore create fair housing barriers.

The City has identified specific goals to address fair housing issues, as contained in the Orange County Regional Analysis of Impediments to Fair Housing, 2020-25. The City’s stated fair housing goals include the following:

**Table 4-1: AFFH Actions**

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics
<b>Housing Mobility</b>				
Educational Opportunities	1. Collaborate with high performing school districts to promote a diversity of students and staff to serve lower income students and identify potential resources for students in-need.	<b>Medium Priority –</b> Implement within 12 months of adoption of the 2021-2029 Housing Element. Annual outreach.	Regional	The City has little involvement in the functioning of the local School District’s operations. The City can commit to promoting resources available to lower scoring schools <u>in an effort to increase educational opportunity scores.</u> <sup>1</sup> <u>Aim to assist a minimum of 10 households, throughout the 6<sup>th</sup> cycle, in accessing available resources.</u>
	2. Collaborate with schools to gather input and feedback from parents on potential resource and after-school program needs.	<b>Medium Priority –</b> Implement within 12 months of adoption of the 2021-2029 Housing Element.	City-wide	The City’s Community Services Department offers an educational after-school program in collaboration with the Youth Centers of Orange. The City will engage with members in relation to programming and student needs and continue the program provided funding remains available. <sup>1</sup> <u>Identify and pursue new funding sources if needed.</u> <u>Aim to assist a minimum of 25 households throughout the 6<sup>th</sup> cycle.</u>



**Table 4-1: AFFH Actions**

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics
Regional Opportunity, Place	1. Collaborate with community land trusts, and other relevant affordable housing developer and organizations, as a mechanism to develop affordable housing in high-opportunity areas.	<b>Medium Priority</b> – Implement within 12 months of adoption of the 2021-2029 Housing Element. Host one meeting annually.	City-wide	The City has good working relationships with Orange Housing Development Corporation, Orange Senior Housing, and HomeAid, and will develop outreach materials related to housing opportunity sites <u>by December 2023</u> . These entities each have an affordable housing project in the works, all of which are located in areas with high concentrations of employment and transit service. The City will continue coordination with these groups to work towards meeting affordable housing needs within the community. <u>Aim to develop 5 residential projects with affordable housing units from these relationships and in high-opportunity areas.</u>
<b>Housing Choice and Affordability in Areas of Opportunity</b>				
Economic Opportunities	1. Prepare a Transfer of Development Rights Ordinance to provide opportunities for development transfers to accommodate higher density housing in transit- and employment-rich areas of the City. This will provide all segments of the community with improved economic opportunities and access.	<b>High Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	The City initiated work on the Transfer of Development Rights Ordinance in July 2022. A feasibility study was completed for the ordinance in early 2022. <u>Adopt the ordinance in late 2023.</u>
	2. Once the Transfer of Development Rights Ordinance is adopted, the City will promote it to the development community and relevant property owners.	<b>Low Priority</b> - Implement following the adoption of the Ordinance. Outreach annually.	City-wide	Promote informational materials annually once the Ordinance is adopted. <u>Aim for outreach to result in at least one transfer of development rights project for affordable housing development over the 6<sup>th</sup> cycle.</u>



**Table 4-1: AFFH Actions**

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics
Regional Opportunity, Place	1. Continue to follow current State Density Bonus law and further its implementation through a Density Bonus Ordinance update.	<b>Medium Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	Amend the Density Bonus Ordinance by FY 23/24.
	2. Prepare and adopt a Small Lot Subdivision Ordinance to streamline entitlement processing of housing development projects.	<b>Medium Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	The City adopted a Small Lot Subdivision Ordinance in November 2021. Planning staff will promote the ordinance to housing developers as an alternative development type for housing in Orange. <a href="#">Aim for outreach to result in at least one SLO project with an affordable housing component over the 6<sup>th</sup> cycle.</a>
<b>Place-Based Strategies – Conservation and Revitalization</b>				
Educational Opportunities	1. Seek funding opportunities for community assets and promote available resources to schools and relevant agencies and organizations.	<b>Medium Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	<p>The City of Orange does not provide direct funding to the local School District but does offer and promote an after school program in collaboration with the Youth Centers of Orange. The City’s Library also offers free lunches through the Summer Food Service Program administered by the California Department of Education for children and teens under the age of 18. The Library also offers a Homework Center for children and teens.</p> <p>The City will continue to provide these programs (contingent on funding availability) to the community which benefit community assets and promote equitable access to community resources.</p>



**Table 4-1: AFFH Actions**

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics
Environmental Opportunities	1. Seek funding opportunities for improving environmental opportunities and promoting sustainable transportation.	<b>Medium Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element. Annually review available funding and <b>pursue</b> new potential opportunities.	City-wide	The Public Works Department and Community Services Department regularly seek funding for park and trail improvements, and transportation improvements that support bicyclists and pedestrians. Community Development staff also pursues funding opportunities for long-range planning efforts that incorporate policies and actions designed to retrofit the suburban environment to be more conducive to sustainable transportation and alternative modes.  Continue to <b>monitor</b> available funding and <b>pursue</b> additional funds.
Regional Opportunity, Place	1. Encourage residents from areas of low resources to serve on boards, committees, task forces, and other local government decision-making bodies.	<b>High Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element. Annually outreach to target areas.	Low resource census tracts	Engage City Council Members in an effort to outreach to target areas identified as low resource within their districts. Seek to have a minimum of 2 individuals from target areas serve on local government decision-making bodies by the end of the planning period.
	2. Host an annual community meeting with targeted outreach to areas of low opportunities to gather input and feedback from residents and promote ways for the community to remain engaged.	<b>Medium Priority</b> - Implement within 12 months of adoption of the 2021-2029 Housing Element. Host one meeting annually.	Low resource census tracts	Engage City Council members to gather input and feedback on community engagement opportunities within City boards. Seek to improve overall access to opportunities and increase civic engagement from underrepresented communities. <sup>1</sup>



**Table 4-1: AFFH Actions**

Contributing Factor	Specific Commitments	Timeframe	Geographic Target	Metrics
	3. Expand access to community meetings, including addressing language barriers and meeting times and access.	<b>High Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	Provide Spanish language translation services and establish virtual broadcasting and participation for public meetings by FY 23/24.
<b>Protection from Displacement</b>				
Economic Opportunities	1. Establish a small business advocate office and/or a single point of contact for small business owners.	<b>Low Priority</b> – Ongoing throughout the 2021-2029 Housing Element.	City-wide	The City’s Economic Development staff is the point of contact for small and large business owners and plays a role in facilitating City department coordination and processes. This organization has been successful and the City will continue to function in this role during the planning period.
	2. Engage local small businesses to hear and consider their needs	<b>Medium Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	The City’s Economic Development staff have a very interactive relationship with the Chamber of Commerce and local businesses. The City will establish a small business outreach program with the Chamber of Commerce.
	3. Promote local small business on the City’s website to increase visibility and promote assistance programs available to small business owners.	<b>Low Priority</b> - Implement within 24 months of adoption of the 2021-2029 Housing Element.	City-wide	Establish a small businesses page on the City’s website by FY 23/24.
Regional Opportunity, Place	1. Continue providing CDBG funds to the Fair Housing Foundation to provide fair housing activities to the community.	<b>High Priority</b> – Annually <u>monitor</u> and <u>pursue</u> funding.	City-wide	Annually <u>monitor</u> available funding and <u>pursue</u> additional funds.
<b>Notes:</b>				
1. Action outcomes are difficult to quantify, but the City is dedicated to 1) providing quality education and supporting local students in accessing higher education and employment and 2) improving access to opportunities and civic engagement from underrepresented communities.				

**Timeframe:** Monitor individual actions and timeframes annually  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund



#### **Housing Policy Action 4B:** Homeless Services

The City will continue to support local and inter-jurisdictional efforts to reduce temporary and chronic homelessness. The City shall continue to promote a comprehensive approach to addressing homelessness consistent with the Continuum of Care model. Additionally the City provides support for the Navigation Centers in Buena Park and Placentia in the form of financial assistance for operations.

#### **Objectives:**

- Coordinate with 2-1-1 Orange County, non-profit entities, the Orange County Housing Authority and other applicable government agencies to provide a range of services and housing opportunities for homeless persons in Orange.

**Timeframe:** Annually coordinate with local organizations and entities.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** Former Redevelopment, CDBG, and PLHA funds

#### **Housing Policy Action 4C:** Support Fair Housing Services

The City of Orange currently contracts with the Fair Housing Foundation which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City refers all inquiries for these services to the Fair Housing Foundation and maintains literature and informational brochures at City Hall available for public distribution.

#### **Objectives:**

- Provide informational brochures at the City library, Senior Center and other locations frequented by the public.
- Continue the provision of fair housing assistance including landlord/tenant counseling and amelioration or removal of identified impediments and work with the Fair Housing Foundation to provide community education on fair housing throughout the year.
- Continue to contract with the Fair Housing Foundation or a similar agency for these services.

**Timeframe:** Annually promote information and maintain updated information; review fair housing assistance annually and on a case-by-case basis.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** CDBG funds

#### **Housing Policy Action 4D:** Section 8 Rental Assistance

On behalf of the City, the Orange County Housing Authority currently administers the Section 8 Rental Assistance program which assists renter households in the City. The City of Orange will continue to provide referral services and information to the City's residents.

#### **Objectives:**

- Assist 484 households annually through the planning period.

**Timeframe:** Annually assist households; maintain updated information and outreach annually; and implement changes based on feedback from outreach.

**Responsible Agency:** Orange County Housing Authority

**Funding Source:** General Fund



**Housing Policy Action 4E:** Support for Persons with Developmental Disabilities

The City Staff will support the ability of persons with developmental disabilities to live in integrated community settings. The City will work with the Regional Center of Orange County to identify the housing needs of persons served by the Center, promote opportunities for supportive living services and support efforts to eliminate barriers to housing for persons with developmental disabilities.

**Objectives:**

- Annually outreach to and partner with the Regional Center of Orange County to identify the housing needs of persons served by the Center, promote opportunities for supportive living services and support efforts to eliminate barriers to housing for persons with developmental disabilities.

**Timeframe:** Annually outreach to and partner with the Regional Center of Orange County.

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 4F:** Housing for Persons with Disabilities

The City will amend the Orange Municipal Code to be compliant with State law regarding residential care facilities serving seven (7) or more persons in all residential zones, as well as ensure barrier-free housing choices for persons with disabilities. The City will also provide information online and at City Hall on reasonable accommodation with respect to zoning, permit processing, or building laws.

**Objectives:**

- Update the Orange Municipal Code to comply with State law.
- Provide information online and at City Hall on reasonable accommodation with respect to zoning, permit processing, or building laws.

**Timeframe:** Adopt Municipal Code amendment by December 2023; maintain update information online and at City Hall

**Responsible Agency:** City of Orange Community Development Department

**Funding Source:** General Fund

**Housing Policy Action 4G:** Emergency, Transitional and Supportive Housing and Lower Barrier Navigation Centers

The City will update the Orange Municipal Code to permit Low Barrier Navigation Center development as a matter of right in appropriate zoning districts, subject to requirements of state law. Per California Government Code Section 65660, low barrier navigation centers are defined as a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. "Low Barrier" means best practices to reduce barriers to entry. These requirements include implementing standards, provisions and limitations governing the permitting, development, siting and management of Low Barrier Navigation Centers. The City of Orange will continue to identify revisions and adopt amendments to the Municipal Code to comply with State law updates.

**Objectives:**

- Adopt an amendment to the Orange Municipal Code to permit Low Barrier Navigation Center in compliance with State law.
- Update the Orange Municipal Code to comply with State law.



**Timeframe:** [By December 2023](#), Reviewed Annually for updates in response to changes in State law  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 4H:** Single Room Occupancy Units

The City will update the Orange Municipal Code to permit Single-Room Occupancy units in appropriate zoning districts, subject to requirements of state law. These requirements include implementing standards, provisions and limitations governing the permitting, development, siting, and management of Single-Room Occupancy units. The City of Orange will continue to make the appropriate revisions the Municipal Code to comply with California Government Code Section 65583(c)(1).

**Objectives:**

- Update the Orange Municipal Code to comply with State law.

**Timeframe:** [By December 2023](#), Reviewed Annually for updates in response to changes in State law  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 4I:** Farmworker and Employee Housing Act Compliance

The City of Orange will update the Orange Municipal Code to comply with provisions for farmworker housing in compliance with the Employee Housing Act (Sections 17000-17062.5 of the California Health and Safety Code).

**Objectives:**

- Update the Orange Municipal Code to comply with State law.

**Timeframe:** [By December 2023](#)  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund

**Housing Policy Action 4J:** Emergency Shelter Development Standards

The City of Orange Municipal Code currently requires emergency shelters to be located at least five hundred feet from any residential use or residentially-zoned property, public or private park, or public or private kindergarten through 12<sup>th</sup> grade curriculum school, as measures from the closest property line, as well as be located within half-a-mile of a transit stop. These requirements fall outside the scope of allowable standards relating to siting of homeless/emergency shelters per Government Code section 65583, subdivision (a)(4)(A).

**Objectives:**

- Amend the Municipal Code to be consistent with State law.

**Timeframe:** [By December 2023](#)  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General Fund



## C. Summary of Quantified Objectives

Income Group	Extremely Low <sup>1</sup>	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA) <sup>2</sup>		1,671 units		677 units	1,588 units	3,936 units
Accessory Dwelling Units		217 units		96 units	7 units	320 units
Conservation/Preservation		51 units		--	--	51 units
Rental Subsidy		--		--	--	--
Rehabilitation		16 units		--	--	16 units
<b>Notes:</b>						
(1) Extremely Low Units are defined by HCD as half of the City's Very-Low Income need.						
(2) New construction (RHNA) quantified objectives are inclusive of the Accessory Dwelling Unit production.						

# Appendix A: Review of Past Performance





# Review of Past Performance

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## Program Evaluation for Households with Special Needs

The City of Orange has demonstrated a significant effort in working towards accomplishing many of the objectives set for the programs of the past cycle. During the fifth cycle, the City completed a number of key programs to support housing opportunity and made substantial progress towards many of its programs. The City's successful programs have been identified as continued for the sixth cycle, due to their success in the fifth cycle.

As a part of analyzing prior programs, the element must provide an explanation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations. The table below provides an overview of the City's prior program accomplishments; achievements related to special needs populations are summarized below:

### Seniors

Section 2 shows that 17,076 persons were age 65 and over in Orange in 2019, a total of 12.2 percent of the total population. Senior Housing is permitted "by right" in all Residential and Mixed Use Zoning districts. In addition, OMC Chapter 17.15 provides for density bonuses and other incentives for Senior Housing.

The following projects either received final building inspections or were entitled during the planning period.

- 2016 – Code amendments adopted that allow senior housing in commercial districts
- 2017 - Final building inspections were completed for Encore Hewes Senior Apartments (12 age qualified multiple family rental units)
- 2018 - Final Building inspections were completed for Oakmont (98 assisted living units) and Prospect Senior Apartments (28 age-qualified multiple-family rental units)
- 2019 - Project entitlements were completed for Orange Senior Housing (74 age-qualified low-income multiple-family rental units), Orange Sky Villas (23 age-qualified multiple-family rental units), and Sunrise Senior (93-unit, 120 bed senior assisted living and memory care facility). Additionally the City approved/is processing the ActivCare (under construction) and Park Plaza Memory Care (going through entitlement) facilities.



## Persons with Disabilities

According to the 2019 ACS, about eight percent of Orange’s population reported a disability. Of that 8 percent, ambulatory difficulty represented the highest at 48.9 percent of persons reporting a disability. Hearing and self-care disabilities totaled about 54.3 percent of the population with a disability, cognitive disabilities represented 39.1 percent and independent living difficulties represent 38.4 percent.

The City annually pursued focused outreach efforts with the Regional Center of Orange County to identify the needs of persons with development disabilities and to promote opportunities and eliminate barriers for housing.

During the planning period, the Orange County Housing Authority (OCHA) assisted the following number of renter households within Orange through the Section 8 Housing Choice Voucher (Rental Assistance) Program:

- FY 2013-14 - 455 Total (132 families, 217 elderly, 106 disabled households).
- FY 2014-15 - 597 Total (177 families, 206 elderly, 153 disabled households).
- FY 2015-16 - 454 Total (123 families, 218 elderly, 112 disabled households).
- FY 2016-17 - 436 Total (110 families, 222 elderly, 104 disabled households).
- FY 2017-18 - 460 Total (116 families, 236 elderly, 108 disabled households).
- FY 2018-19 - 439 renter households.

OCHA also administered the rental assistance component of the Family Self-Sufficiency (FSS) Program, Family Unification Program (FUP), and Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) Program. Each of these programs rental assistance for various at-risk groups with the intention of providing safe and sounds housing for all vulnerable members of the Orange population.

## Large Households

Large households are defined as those consisting of five or more members. Large households typically have a limited supply of locally available, adequately sized and affordable housing units. According to the data large households made up 13.8 percent of all households in the City. Policy Action 5 below lists the City’s accomplishments in developing housing for large households, including over 1,800 residential units; many of which can accommodate large households.

In 2015, construction began on the Lemon Grove affordable housing project (82 affordable units) which included floor plans oriented towards large families. The development includes 58 units with 3 bedrooms and 2 bathrooms and was constructed during the planning period.



## Farmworkers

Farmworkers are defined as persons whose primary incomes are earned through seasonal agricultural work. Farmworkers have special housing needs because they earn lower incomes than many other workers and move throughout the year from one harvest location to the next. The 2019 ACS data reported that there were 5,407 persons employed in natural resources, construction, and maintenance occupations; of those, 205 persons were employed in the farming, fishing, and forestry industries.

As previously discussed, farm workers are not a significant portion of the Orange community. Their needs are accommodated through housing programs and policies that assist lower-income households in general rather than specialized programs, such as:

- Policy Action 4: Support and Outreach for Affordable Housing Production.
- Policy Action 9: Support Community Housing Development Organization New Construction Projects
- Policy Action 12: Affordable Housing Resource “Toolkit”
- Policy Action 15: Acquisition/Rehabilitation of Multi-Family Residential Development

## Single-Parent Households

As shown in Section 2, single parent households make up 7.1 percent of total households. The City of Orange provides a number of community programs and resources for children which may assist single-parent households. The City of Orange, in partnership with the Youth Centers of Orange, offers after-school enrichment for children Kindergarten to 8th Grade. This after-school program includes group activities, homework help, a nutritional program, and a special focus on Character Development for a nominal fee. All scheduled programs are in conjunction with the OUSD academic calendar. After-school recreation programs are offered throughout the community at El Camino Real Park, Grijalva Park, and Killefer Park. The Teen Action Committee (T.A.C.) also offers activities and community projects for teens entering the 7<sup>th</sup> grade through 15 years of age.

Other community organizations and schools that provide resources for children in the City include:

- Youth Centers of Orange
- St. John’s Lutheran School District
- Orange Unified School District
- Covenant Christian School
- Oakridge Private School



## Persons Experiencing Homelessness (Unhoused)

According to the County's Point in Time Count, persons experiencing homelessness included 193 unsheltered and 148 sheltered individuals.

In collaboration with a number of neighboring Orange County cities, the City of Orange participates in the North Services Planning Area (SPA) partnership. The North SPA Partnership is a joint collaboration that includes two full-service Navigation Centers to provide help to the region's homeless. The Buena Park Center and the Placentia Center will provide homeless individuals a total of 250 beds, health resources, job skill training, and the ability to reconnect with lost family. These facilities join the two shelters already built by the City of Anaheim, which house another 326 beds.

In addition to participating in the North SPA, Orange has undertaken several other initiatives over the past few years to address local homelessness issue; including partnering with HomeAid of Orange County to develop the Orange Family Care Center. The Orange Family Care Center specializes in serving the needs of families who are experiencing homelessness and has over 55 beds.

The Orange Police Department's Homeless Engagement, Assistance & Resource Team (HEART) program has been operating since 2013. HEART Officers engage daily with local homeless individuals, working with them one-on-one to help facilitate their re-entry back into mainstream society. The Police Department also assists in providing resources and assistance through collaborations with local community organizations and agencies listed in Section 2.

## Extremely Low Income Households

Very low-income households are those households that earn 50 percent or less of the median family income (MFI) for Orange County. Extremely low-income households are those households which earn less than 30 percent of the MFI. There are approximately 5,490 extremely low-income households in Orange (renters and owners).

The City currently has 34 total affordable housing developments. This includes 1,524 deed-restricted affordable units ranging from studios to three-bedroom units available for lower-income households, seniors, and workforce housing.

## Review of Past Performance

The following **Table A-1** is a review of the City of Orange's housing project and program performance in the 2014-2021 Planning cycle. It is an evaluation of the 5<sup>th</sup> cycle's Policy Program and considers all current and existing programs and projects as well as the most current accomplishments and effectiveness and appropriateness.



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 1: Processing Annexation of East Orange General Plan Area</b></p> <p>To maximize future residential development potential in the City, the City is in the process of annexing the East Orange area into the City. This process began in 2006 and shall continue until the remaining portions of the area are included within the City’s legal boundaries.</p>	<p>Annexation of East Orange Area</p>	<p>Annexation and residential construction in East Orange was not pursued by the property owner. The property owner has dedicated the property to the County of Orange as permanent open space. Residential development is no longer anticipated for this property.</p>	<p><b>Removed.</b> Annexation of this property is no longer being considered at this time. The City is continuing to look for ways to maximize future residential development potential within the City through the 6th Cycle Policy Actions and Sites Inventory.</p>
<p><b>Policy Action 2: Annual Review of Housing Element</b></p> <p>Pursuant to HCD Requirements, the City will continue to conduct an annual implementation review of the Housing Element. The review includes the following information: a log of new residential development permits and completion reports; inventory of units built in the Extremely Low-, Very Low- and Low-Income categories, an update or inventory of approved projects; an annual estimate of population from the State Department of Finance; and available vacant land and zoning survey.</p>	<p>Annual Housing Element Review</p>	<p>The City has completed an annual review of its 5th Cycle Housing Element as part of the Annual Progress Reports (APRs) provided to HCD yearly. The City has completed APRs through 2019.</p>	<p><b>On-going.</b> As required by state law, the City will continue to review the current Housing Element through the timely completion of their Annual Progress Reports.</p>
<p><b>Policy Action 3: Promotion of Affordable Housing</b></p> <p>The City recognizes the need for housing</p>	<p>Support and encourage the development of 42 Extremely-</p>	<p>With the dissolution of Redevelopment Agencies in 2011/2012, the City could no longer promote affordable housing through financial assistance programs through the</p>	<p><b>On-going.</b> The City will continue to promote the development of affordable housing through</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>affordable for all income segments of the population, especially Lower-Income households. The City will continue to support and encourage the development of housing affordable to Lower-Income households through incentives such as density bonuses.</p>	<p>Low Income Housing Units, 41 Very Low-Income Housing Units, 59 Low-Income Housing Units</p>	<p>Orange Redevelopment Agency. The City maintained efforts to promote affordable housing through outreach, density bonus, regulatory incentives and some limited funding when available.</p> <p>Housing Development accomplishments within the 5th Cycle planning period include:</p> <p>2014 - The City issued building permits for 336 moderate income and 12 above moderate income units.</p> <p>2015 - The City issued building permits for 264 moderate income and 3 above moderate income units.</p> <p>2016 - the City issued building permits for 9 deed-restricted very-low income units, 72 deed-restricted low income units, 4 moderate income units, and 22 above moderate income units.</p> <p>2017 - The City issued building permits for 4 moderate income units and 75 above moderate income units.</p> <p>2018 - The City issued building permits for 10 moderate income units and 19 above moderate income units.</p>	<p>community outreach, education, density bonus, regulatory incentives and funding when possible.</p> <p>Additionally, the City has been successful in partnering with local organizations to promote the development of affordable housing. The City will continue to partner with the Orange Housing Development Corporation (OHDC) on the development of affordable housing units within the City and seek out additional opportunities to partner with non-profit organizations.</p> <p>The City currently is processing entitlement applications for a joint partnership affordable housing projects with Sisters of St. Joseph of Orange and Mercy Housing. The proposed project</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>2019 - The City issued building permits for 662 moderate income units and 418 above moderate income units.</p> <p>The City has been very successful in permitting and constructing housing at all income levels over the 5th Cycle RHNA planning period. In addition to the building permits discussed, the City has a number of other projects currently in various stages of the entitlement process. While most projects have not defined levels of affordability for their units, some are on "housing opportunity sites" and units are anticipated to be accessible to households with a range of income levels, some of which may fall into affordable categories.</p> <p>In 2019, the City began a new project, continuing its partnership with the Orange Housing Development Corporation (OHDC) to develop supportive housing. OHDC is a nonprofit organization dedicated to providing secure, clean and attractive housing for families of low and moderate incomes. The partnership with OHDC has successfully resulted in the Citrus Grove and Lemon Grove (82 affordable units) projects.</p>	<p>includes senior housing units and affordable rental units for homeless families. Additionally the City will continue to process projects with OHDC in the future.</p>
<p><b>Policy Action 4: Support and Outreach for Affordable Housing Production</b></p>	<p>Support and outreach for</p>	<p>With the dissolution of Redevelopment Agencies in 2011/2012, the City could no</p>	<p><b>On-going.</b> The City continues to promote</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>Continue to promote the development of new housing affordable to Extremely Low-, Very Low and Low-Income households where such development will promote a balanced inventory of housing types. The City shall continue to outreach to the development community, seek partnerships and provide in-kind assistance in developing new affordable housing.</p>	<p>development of affordable housing units</p>	<p>longer promote affordable housing through financial assistance programs through the Orange Redevelopment Agency. The City maintained efforts to promote affordable housing through outreach, density bonus, regulatory incentives and some limited funding when available.</p> <p>In 2017, an affordable housing toolkit, which provides internet-based resources for the public and development community was completed and posted on the City’s website.</p> <p>The City has a long standing relationship with the Orange Housing Development Corporation (OHDC) to develop supportive housing. OHDC is a nonprofit organization dedicated to providing secure, clean and attractive housing for people of low and moderate incomes. OHDC was founded in 1990 and has partnered with the City of Orange for years to develop affordable housing projects, including Serrano Woods, Citrus Grove, Alice Clark Orange Blossom, Esplanade Apartments and more.</p> <p>Refer to Policy Action 3 for a list of Orange's successful progress in permitting units at a range of affordability levels, including low and very-low income units.</p>	<p>affordable housing through outreach, density bonus, regulatory incentives and some limited funding when possible. The City will continue in the 6th Cycle planning period to pursue methods of outreaching to the local development community, including non-profit developers, to explore partnerships and provide in-kind assistance in developing affordable housing within Orange.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 5: Development of Housing for Large Families</b></p> <p>Continue to encourage and support through outreach to private and non-profit housing developers, the development of rental and for-sale housing for larger (5 or more persons) families. Encourage developers/builders to incorporate larger bedroom counts (3 or more bedrooms) to accommodate the needs of larger families and reduce incidents of overcrowding in the existing housing stock. The City will evaluate providing regulatory incentives such as density bonuses that encourage and support the development of housing for large families on a project-by-project basis.</p>	<p>Support and encourage the development of New Housing Units for Large Families</p>	<p>The following is the City's progress during the 5th Cycle RHNA planning period in developing housing suitable for large families (3+ bedrooms). With the exception of the age- or health-qualified projects and ADUs, all residential units shown below included floor plans that may facilitate large families in the unit mix.</p> <p>2014 - The City constructed two housing units which may accommodate large families.</p> <p>2015 - The City finalized 9 new residential units, 5 of which may accommodate large families. Construction began on the Lemon Grove affordable housing project (82 affordable units) which included floor plans oriented towards large families.</p> <p>2016 - The City finalized 5 residential units, three of which could accommodate large families.</p> <p>2017 - The City issued final building inspections on 474 residential units. Not all units were specifically for large families.</p> <p>2018 - The City received final inspections on 343 residential units. Not all units were specifically for large families.</p>	<p><b>On-going.</b> The City will continue to promote the development of housing suitable for large families. In recent years Orange has seen a number of large apartment projects constructed, most of which have a portion of their unit mix dedicated to 3+ bedroom units. Additionally, there have been a number of new single-family residences constructed within Orange during the planning period, the majority of which may accommodate large families.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>2019 - The City issued 1,008 building permits, the majority of which were apartments and single-family homes. Not all units were specifically for large families.</p>	
<p><b>Policy Action 6: Provision of Senior Housing Opportunities</b></p> <p>The City recognizes the unique needs of its elderly residents. Seniors typically have fixed incomes and unique housing needs such as physical limitations requiring accessibility features that are not typically included in market rate housing. The City shall continue to encourage through regulatory incentives the development of senior housing that offers a wide range of housing choices from independent living to assisted living with on-site services. The City currently has special incentives for senior housing, as provided in Section 17.15 of the Zoning Code.</p> <p>To further encourage development of housing for seniors, the City shall evaluate the existing provisions in the Zoning Code for additional opportunities for regulatory relief on a project-by project basis.</p>	<p>Senior Housing Development</p>	<p>Senior Housing is permitted “by right” in all Residential and Mixed Use Zoning districts. In addition, OMC Chapter 17.15 provides for density bonuses and other incentives for Senior Housing. Senior housing is also permitted, subject to Conditional Use Permit approval within commercial zones. The Commercial Code includes development standards (Urban Mixed Use zoning standards) designed to encourage and facilitate infill senior housing development close to goods and services.</p> <p>The following projects either received final building inspections or were entitled during the planning period.</p> <p>2016 – Code amendments adopted that allow senior housing in commercial districts</p> <p>2017 - Final building inspections were completed for Encore Hewes Senior Apartments (12 age qualified multiple family rental units)</p>	<p><b>On-going.</b> The City has been extremely successful in permitting and constructing a number of Senior Housing projects. The City will continue to promote the development of senior housing opportunities at all income levels.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>2018 - Final Building inspections were completed for Oakmont (98 assisted living units) and Prospect Senior Apartments (28 age-qualified multiple-family rental units)</p> <p>2019 - Project entitlements were completed for Orange Senior Housing (74 age-qualified low-income multiple-family rental units), Orange Sky Villas (23 age-qualified multiple-family rental units), and Sunrise Senior (93-unit, 120 bed senior assisted living and memory care facility). Additionally the City approved/is processing the ActivCare (under construction) and Park Plaza Memory Care (going through entitlement) facilities.</p>	
<p><b>Policy Action 7: Facilitate Infill Construction</b></p> <p>The City has a 2014-2021 RHNA need of 363 housing units for Extremely Low-, Very Low-, Low and Moderate-Income households. The City has limited vacant land available for residential development and no vacant land zoned at densities to support affordable housing. Therefore, the City will continue to encourage infill development within feasible development sites for homeownership and rental units</p>	<p>Support and facilitate the development of 363 infill housing units</p>	<p>In 2017, the City developed a parcel list and maps highlighting properties that were identified in the Housing Element as "housing opportunity sites". This list is available to the public and intended to facilitate the development of affordable housing on infill sites. Previously this list was available to the public through the adopted 5th Cycle Housing Element.</p> <p>In 2019, the City completed actions that brought W. Katella Zoning into consistency with the General Plan for Urban Mixed-Use.</p>	<p><b>On-going.</b> The City has been successful in developing housing on infill sites as much of the land within the city limit is developed and little viable vacant land exists. The majority of this development has been within the low-, moderate- and above moderate-income categories.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>affordable to Extremely Low-, Very Low-, Low- and Moderate-Income households. The City will continue to facilitate infill development through implementation of its General Plan and Zoning Code, which allows for higher density housing in appropriate areas of the City where potential exists for site redevelopment. In addition, the City will encourage compatible residential development integrated into existing neighborhoods and districts where appropriate.</p> <p>To further encourage infill housing development, the City shall evaluate the existing provisions in the Zoning Code for feasibility of providing additional regulatory relief (i.e., streamlined review, reduced development standards, lot consolidation, and other methods deemed appropriate).</p> <p>The City will identify and develop an inventory of potential infill sites utilizing the site analysis found in Appendix B of the Housing Element. The City will seek partnerships with and provide informational material including a copy of the inventory and listing of City incentives and programs to housing developers.</p>		<p>The following new dwelling units were received building permits on infill sites during the planning period:</p> <p>2014 - 3 new infill units            2015 - 9 new infill units            2016 - 5 new infill units            2017 - 474 new infill units            2018 - 343 new infill units            2019 - 1,051 new infill units</p>	<p>The City continues to evaluate their zoning code to encourage the development of infill housing and remove potential constraints to infill development.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 8: Explore Alternative Funding and Financing Sources</b></p> <p>The City of Orange currently has limited funding and financing sources to incentivize new affordable housing development. Previously, the City utilized Redevelopment funds and Federal HOME funds to assist in the development of new housing. In order to maximize the opportunities for new housing development, the City will continue to use HOME funds, and explore alternative funding and financing sources such as public-private partnerships.</p>	<p>Funding and Financing for Housing Development</p>	<p>With the dissolution of the Orange Redevelopment Agency (ORA), funding sources for housing development continue to be limited. Federal HOME Investment Partnerships funds and Low and Moderate Income Housing Asset Funds (LMIHAF) [program income from former ORA Housing Set-Aside funds] are the City’s only remaining funding sources for housing development and are very limited.</p> <p>The City also has limited Community Development Block Grant (CDBG) funds, which could be allocated for housing rehabilitation. However, these funds are typically allocated to City and nonprofit agency public services and public facilities, and City infrastructure projects in low income residential areas.</p> <p>In 2014, the City began negotiations with a partnership of the Orange Housing Development Corporation (OHDC) and C&amp;C Development Co. to provide financial assistance for the Lemon Grove Apartment Projects (affordable rental housing). This project was entitled in 2015 and later constructed. “Additionally, the City completed the OHDC Corp Yard Project and the Orange Senior Housing project (financed in part by the sale of Triangle Terrace, the sale of which was</p>	<p><b>On-going.</b> No applications were received for any income-restricted projects in recent years, however the City continues to explore creative opportunities to provide funding and other resources to developers and organizations looking to build affordable housing with Orange.</p> <p>In the 6th Cycle RHNA planning period, the City intends to explore alternative funding options for new housing development.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 9: Support Community Housing Development Organization New Construction Projects</b></p> <p>Provide funding for qualified CHDO's to develop affordable housing. (Currently the City's only qualified CHDO is the Orange Housing Development Coordination.) The City will continue to seek qualified non-profit organizations for acquisition, construction and rehabilitation of affordable housing. Funds will be made available on an annual basis, contingent on funding availability.</p>	<p>CHDO Support</p>	<p>leveraged by the city for construction of more senior affordable units.</p> <p>Although no CHDO applications are currently in processing, the City partnered with Orange Housing Development Corporation (OHDC) on the development of the affordable 82-unit Lemon Grove Apartments project, which was completed in October 2017. OHDC is the only CHDO in the City of Orange currently.</p> <p>The City provided a \$1.3 million loan of HOME funds to cover a portion of the project costs in return for 55-year affordability covenants.</p>	<p><b>On-going.</b> This City successfully worked with OHDC, the only CHDU within the City or Orange during the 5th Cycle RHNA planning period. The City will continue to seek opportunities to work with non-profit organizations for the development of affordable housing during the 6th Cycle RHNA planning period.</p>
<p><b>Policy Action 10: Monitoring Adequate Sites for Housing Development</b></p> <p>The City has a 2014-2021 RHNA need of 363 housing units for Extremely Low-, Very Low-, and Low-Income households. To ensure the availability of adequate sites within the Urban Mixed Use zoning districts to accommodate the remaining RHNA need for Lower-Income households, the City of Orange shall continue to require non-residential and mixed use projects in the Urban Mixed Use (UMU) zoning districts only be approved when a finding can be</p>	<p>Adequate Sites for Housing</p>	<p>The City adopted the Orange General Plan update in March 2010. Approximately 426 acres are General Planned Urban Mixed Use (UMU). Mixed Use Zoning was adopted in July 2011. To date, 292 acres (this includes the 2017 approved Zone Change from Commercial Recreation (C-R) to Urban Mixed Use (UMU) for the Branch West Apartments project) have been zoned Urban Mixed Use.</p> <p>The Urban Mixed Use zone allows for 30 to 60 dwelling units per acre, thus providing opportunities for development of affordable housing. In order to approve non-residential</p>	<p><b>Completed.</b> The City was successful in monitoring the development of housing at all income levels within the 5th Cycle RHNA Planning Period through the frequent updating of their RHNA Sites Monitoring Database.</p> <p>SB 6 requires the City to create a process for and maintain and internet accessible database of land</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>made that the project will not reduce UMU-zoned land available for residential development such that the City can no longer accommodate its remaining RHNA need. The City will continue to track the availability of UMU-zoned sites greater than one half-acre in size through its RHNA Housing Sites Monitoring System to ensure a minimum of 12.1 acres of UMU-zoned land is available for residential development. The monitoring system will adjust the acreage needed based upon the City's remaining need for Lower-Income housing units on a project-by-project basis. The monitoring system shall be updated on a project-by-project basis and an annual monitoring report shall be provided to the City Council in conjunction with annual progress reporting requirements pursuant to Government Code section 65400.</p>		<p>and mixed-use projects in Urban Mixed Use zones, the decision-making body must first make the finding that the project will not reduce the amount of land available that is designated Urban Mixed Use such that the City's RHNA goals cannot be met.</p> <p>in 2014, the City established a RHNA Sites Monitoring Database. The database is maintained by City staff as development occurs.</p>	<p>suitable for residential development as identified in the City's Housing Element. The City will include a program in the 6th Cycle Housing Element that meets the sites monitoring requirements of State law.</p>
<p><b>Policy Action 11: Review and Amendment of Residential Development Standards</b></p> <p>To respond to changing market trends and encourage continued provision of housing opportunities for Orange residents, the City will review and revise the existing Zoning Code, including residential development standards, as appropriate. The City shall evaluate modifications and/or revisions</p>	<p>Review and Revise Zoning Code</p>	<p>Zoning Code updates focusing on streamlining the process and clarifying development standards for residential development were initiated in 2015, and adoption occurred in 2016. Specifically, the Code was amended to provide greater accommodation of certain types of housing in the Public Institutions zone and to be of greater accommodation to and incentive for senior housing development in commercial zones. The intent of the Code</p>	<p><b>Completed.</b> The City completed a number of Zoning Code updates during the 5th Cycle, many of which promote the development of residential development by expanding the areas in which residential development can occur, increased</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>that further increase the feasibility of residential development while maintaining safety and quality of life standards. Amendments and modifications to the existing Zoning Code may address mixed-use development standards, infill development standards, and multi-family and single-family development standards.</p>		<p>changes are to accommodate housing that is functionally related to an institutional use such as assisted living and employee housing.</p> <p>Zoning Code updates were completed in 2017 aimed at implementing changes in accordance with the provisions of State Law, streamlining, and improving zoning standards and procedures. These updates included changes to the Code to promote the development of accessory dwelling units. Additional updates addressed providing relief to parking and loading requirements for multi-family residential uses.</p> <p>Zoning Code updates were completed in 2018 to expand the existing local Old Towne Historic District and to create a historic district overlay zone for three Eichler Tracts. The zoning code was also updated to include a Master Land Use Table and consolidate use standards. Staff also began updates to sign standards, city-wide parking standards, and density bonus regulations.</p> <p>In 2019, staff updated the Homeless Shelter Ordinance to decrease the separation requirement and increase the number of beds permitted at a shelter. Additionally, staff worked on several Code updates, including</p>	<p>development of ADUs, and relief from constraints to development caused by existing code requirements.</p> <p>The City continues to evaluate the current Zoning Code on an annual basis and has made updates relating to the streamlining of the development process, improved procedures, and the promotion of accessory dwelling units.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>updates to sign standards and city-wide parking standards. These updates are expected to be completed in 2020.</p> <p>The City is currently in the process of preparing a Small Lot Subdivision Ordinance which would provide a mechanism in the City’s Municipal Code for accommodating non-traditional development formats and streamlining residential development on smaller infill residential sites.</p>	
<p><b>Policy Action 12: Affordable Housing Resource “Toolkit”</b></p> <p>To ensure the development community is aware of the availability of State, Federal and local funds as well as local in-kind assistance, the City shall develop an affordable housing resource “toolkit”.</p> <p>The toolkit shall provide for dissemination of information regarding funding/financing options available at the Federal, State and local level, incentives, partnership opportunities and other resources that will promote a well-informed citizenry. The “toolkit” approach shall provide the public with sources intended to educate and inform. The “toolkit” will be an internet-based resource, allowing for easy update,</p>	<p>Affordable Housing Resource “Toolkit”</p>	<p>In 2014, the City began the development of an affordable housing toolkit focused on providing internet-based resources for the public and development community. The toolkit was completed and posted on the City’s website in 2017.</p> <p>The toolkit provides information on the City’s density bonus ordinance, development incentives available to developers who provide affordable housing through density bonus, potential ability to defer impact fees which makes projects more feasible, and various funding sources that may be available to developers who pursue affordable housing components as part of their projects.</p>	<p><b>Completed.</b> The City successfully completed this program in 2017 and the Affordable Housing Resource Toolkit is available for use on the City’s website.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>and contain information such as an inventory of housing opportunity sites, a contact list, and links to affordable housing resources.</p>			
<p><b>Policy Action 13: Balance Housing with Needs of Local Employees</b></p> <p>The City shall explore the housing needs of people currently working in Orange to maximize the potential for residents to live and work in the City. The City shall coordinate with the Chamber of Commerce, local business entities and stakeholder groups to analyze the current needs of the business community and its employees. Based upon the analysis of these needs, the City will develop a strategy to be used as a guidance tool for future partnerships and policy and regulatory revisions to facilitate housing local employees.</p>	<p>Workforce Housing Strategy</p>	<p>Zoning that can accommodate development of workforce housing was put in place in the City’s Mixed Use Zoning districts in 2011. Code changes were initiated in 2015 to provide greater opportunities for the development of housing in the Public Institutions zone.</p> <p>Since 2014, the City has entitled or constructed a number of projects within close proximity to major employers including UC Irvine Medical Center, St. Joseph Hospital, Children's Hospital of Orange County, and the Orange County Transit Authority. These projects include AMLI (334 rental units), Branch West Apartments (94 rental units), The Orange Collection (821 rental units), Eleven 10 Apartments (260 rental units), 999 Town and Country Apartments (250 rental units, and Town and Country Townhomes and Apartments (653 rental units and 74 ownership units).</p> <p>New housing in the Urban Mixed Use district are generally being developed or proposed for development at a density of 60 units/acre. Furthermore, in 2016, the City adopted</p>	<p><b>Completed.</b> The City successfully developed hundreds of new residential units in close proximity to major employment centers within Orange. As employment trends change, the City will continue to promote the development of housing that provides the opportunity for people to live and work within Orange.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		provisions for the development of housing in the Public Institutions zone, ancillary to hospitals or other major medical uses which may facilitate greater opportunities. These industries are major employers in the City.	
<p><b>Policy Action 14: Coordinate with Chapman University to Address Student Housing</b></p> <p>The City will coordinate with Chapman University to respond to the housing needs of the growing student population and challenges relating to integration of student-oriented housing in existing residential neighborhoods. The City will work with the University to undertake activities that may include, but are not limited to, surveying students to understand off-campus housing needs, identifying appropriate locations for and types of off-campus student housing, and establishing policies and procedures to address any issues with neighborhood integration.</p>	Address Student Housing within Orange Neighborhoods	<p>In 2014, the City initiated preliminary discussions regarding the impact of the student population on rental housing costs near Chapman University.</p> <p>In late 2016, Chapman University purchased 2.14 acres of surplus land from the City of Orange adjacent to Panther Village, an existing Chapman University student housing facility.</p> <p>In 2017, the Villa Park Orchards Dormitory Project was approved, which is a 400-bed multi-family residential project in close proximity to the University. Building permits were issued in 2018.</p> <p>In 2018, the City did not receive an application from Chapman University for development of the Panther Village site with additional student housing in that location; however there is potential for future student housing on the site. The City approved parking lot improvements at the site that enable an increase in the occupancy of the complex by students.</p>	<p><b>On-going.</b> The City will continue to pursue opportunities for development adjacent to Chapman University to respond to the needs of the growing student population and work collaboratively with the University to ensure university sponsored student housing is developed in conjunction with any increases in student enrollment.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 15: Acquisition/Rehabilitation of Multi-Family Residential Development</b></p> <p>Subject to available funding sources annually, the City will provide for financing, regulatory incentives and other in-kind technical assistance to non-profits, affordable housing developers and property owners for the rehabilitation/acquisition of multi-family properties for affordable housing. Ensure affordability is maintained long-term through restriction and/or covenants. Prioritize and target those buildings exhibiting the highest levels of deferred maintenance.</p>	<p>4 units annually</p>	<p>The Orange Redevelopment Agency provided financial assistance for acquisition/rehabilitation projects for several years. With the dissolution of the Orange Redevelopment Agency in 2012, funding was not available to assist these projects. Specifically, in the past the City's Home Improvement Program offered grants and zero percent loans to Low Income owner/occupants of single-family homes and mobile homes for a number of years.</p> <p>The City terminated its Home Improvement Program in FY 2012-13 due to the elimination of the Redevelopment Agency in February 2012 and resulting lack of funding. The City will not directly fund a City Home Improvement Program for the foreseeable future. If approached by a qualified nonprofit agency, the City would consider funding rehabilitation programs contingent on funding availability.</p> <p>During FY 2013-14, the City provided a \$20,000 subgrant of Community Development Block Grant (CDBG) funds to Paint Your Heart Out, Inc. for the Orange Paint Day Program. The Program provided free home improvements to five Low Income owner/occupants of single-family homes and three Low Income mobile home owner/occupants.</p>	<p><b>On-going.</b> Due to a lack of Redevelopment Agency funds, the City provided funds for the rehabilitation of 8 total dwelling units. The City will continue to explore funding sources and opportunities for the potential acquisition and rehabilitation of affordable multi-family residential units.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 16: Homeless Services</b></p> <p>Continue to support local and inter-jurisdictional efforts to reduce temporary and chronic homelessness. The City of Orange shall continue to promote a comprehensive approach to addressing homelessness consistent with the Continuum of Care model. The City shall coordinate with 2-1-1 Orange County, non-profit entities, the Orange County Housing Authority and other applicable government agencies to provide a range of services and housing opportunities for homeless persons in Orange.</p>	<p>Coordination/Referral</p>	<p>Throughout the planning period, the City allocated CDBG funds to nonprofit agencies that provided supportive housing and services for the homeless or those at risk of becoming homeless. Additionally, the City allocated CDBG funds to nonprofit agencies that provided public services programs. Although not specifically designed to assist the homeless, these intervention programs often help to prevent homelessness. The City assisted the following number of people through various funding programs:</p> <p>FY 2013-14 - Assisted over 3,800 people  FY 2014-15 - Assisted over 4,000 people  FY 2015-16 - Assisted over 5,780 people  FY 2016-17 - Assisted over 880 people  FY 2017-18 - Assisted over 1,930 people</p> <p>In 2016, building permits were ministerially approved for the “Citrus Family Shelter”, a 56 bed emergency shelter for homeless families. In 2017, final building inspection was received and the shelter is successfully in operation. City Council adoption of Ordinance 06-12 pursuant to SB 2 facilitated the approval of the shelter.</p> <p>In 2018, the City worked with the shelter for operational needs and promoted the shelter</p>	<p><b>On-going.</b> The City was successful in funding multiple non-profit agencies that provide supportive housing and services for community members facing homelessness through CDBG grants. The City will continue to assist these and other organizations provided CDBG funds remain available. The City continues to look for alternative methods to provide services and housing opportunities for homeless persons in Orange.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>via seeking and receiving an American Planning Association, Orange County Chapter Award. Additionally, the received recognition by the Orange County Business Council (OCDC) as a Leading Innovator in “Cutting Red Tape” for its partnership with HomeAid of Orange County for the development of the Orange Family Care Center.</p> <p>In 2019, the City passed an ordinance amending the Orange Municipal Code to modify the Special Use Regulations for homeless shelters, reducing the distance between shelter separation requirements from 300 feet to 275 feet and increasing the maximum number of beds per facility from 100 to 150.</p>	
<p><b>Policy Action 17: Support Fair Housing Services</b></p> <p>The City of Orange currently contracts with the Fair Housing Foundation which provides community education, individual counseling, mediation, and low-cost advocacy with the expressed goal of eliminating housing discrimination and guaranteeing the rights of all people to freely choose the housing for which they qualify in the area they desire. The City refers all inquiries for these services to the</p>	<p>Coordination/Referral</p>	<p>The City contracted with the Fair Housing Foundation (FHF) in FY 2013-14 to provide fair housing education, counseling, enforcement, and related housing activities to affirmatively further housing on behalf of the City to comply with federal regulations. During the 6th Cycle RHNA planning period, FHF has addressed the following cases:</p> <p>FY 2013-14 - 25 discrimination allegations and 289 landlord/tenant disputes            FY 2014-15 - 11 discrimination allegations and 269 landlord/tenant disputes</p>	<p><b>On-going.</b> The City successfully supported fair housing services through their partnership with FHF. The City will continue to contract with FHF to assist in eliminating housing discrimination within Orange.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>Fair Housing Foundation and maintains literature and informational brochures at City Hall available for public distribution. In order to more effectively outreach to the community the City will also provide informational brochures at the City library, Senior Center and other locations frequented by the public. The City will continue the provision of fair housing assistance including landlord/tenant counseling and amelioration or removal of identified impediments. The City will work with the Fair Housing Foundation to provide community education on fair housing throughout the year. The City will continue to contract with the Fair Housing Foundation or a similar agency for these services.</p>		<p>FY 2015-16 - 14 discrimination allegations and 287 landlord/tenant disputes            FY 2016-17 - 10 discrimination allegations and 223 landlord/tenant disputes            FY 2017-18 - 19 discrimination allegations and 224 landlord/tenant disputes            FY 2018-19 - 156 total households</p>	
<p><b>Policy Action 18: Section 8 Rental Assistance</b></p> <p>The Orange County Housing Authority currently administers the Section 8 Rental Assistance program on behalf of the City. Currently the program assists renter households in the City of Orange. Based on future congressional appropriations, the County Housing Authority will apply for additional funding which will enable the Housing Authority to administer additional</p>	<p>483 households/year</p>	<p>During the planning period, the Orange County Housing Authority (OCHA) assisted the following number of renter households within Orange through the Section 8 Housing Choice Voucher (Rental Assistance) Program:</p> <p>FY 2013-14 - 455 Total (132 families, 217 elderly, 106 disabled households.            FY 2014-15 - 597 Total (177 families, 206 elderly, 153 disabled households.            FY 2015-16 - 454 Total (123 families, 218 elderly, 112 disabled households.</p>	<p><b>On-going.</b> OCHA has not received sufficient Housing and Urban Development (HUD) funding annually throughout the planning period to meet the goal of 483 households per year.</p> <p>The City will continue to support OCHA’s applications for Section 8 vouchers as well as the</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p>vouchers for families, elderly, and persons with disabilities over the Housing Element planning period. The City of Orange will continue to provide referral services and information to the City’s residents.</p>		<p>FY 2016-17 - 436 Total (110 families, 222 elderly, 104 disabled households.            FY 2017-18 - 460 Total (116 families, 236 elderly, 108 disabled households.            FY 2018-19 - 439 renter households.</p> <p>OCHA also administered the rental assistance component of the Family Self-Sufficiency (FSS) Program, Family Unification Program (FUP), and Housing and Urban Development-Veterans Affairs Supportive Housing (HUD-VASH) Program. Each of these programs rental assistance for various at-risk groups with the intention of providing safe and sounds housing for all vulnerable members of the Orange population.</p>	<p>continuation of the FSS Program, FUP, HUD-VASH Program, and NED Program.</p>
<p><b>Policy Action 19: Support for Persons with Developmental Disabilities</b></p> <p>Support the ability of persons with developmental disabilities to live in integrated community settings. The City will work with the Regional Center of Orange County to identify the housing needs of persons served by the Center, promote opportunities for supportive living services and support efforts to eliminate barriers to housing for persons with developmental disabilities.</p>	<p>Housing for Persons with Developmental Disabilities</p>	<p>The City annually pursued focused outreach efforts with the Regional Center of Orange County to identify the needs of persons with development disabilities and to promote opportunities and eliminate barriers for housing.</p>	<p><b>On-going.</b> The City will continue to outreach to the Regional Center of Orange County to address and eliminate barriers for housing, provided resources remain available to do so.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 20: Single Room Occupancy Units</b></p> <p>The City recognizes the opportunity for Single Room Occupancy (SRO) units to meet housing needs of the community, especially Extremely-Low, Very-Low and Low-Income households. The City shall develop and implement a SRO ordinance that amends the Zoning Code to include definitions and development standards for the use.</p>	<p>Implement SRO Ordinance</p>	<p>The City began efforts in 2014 to draft and adopt an Ordinance amendment concentrated on identifying opportunities for supportive housing and the homeless crisis in Orange County.</p> <p>In 2020, the City completed the SRO ordinance. The SRO contains a menu of options for addressing the homeless crisis in the area.</p>	<p><b>Completed.</b> The City completed their Single-Room Occupancy Ordinance in early 2020.</p>
<p><b>Policy Action 21: Revise Ordinance to Comply with State Law Regarding Transitional and Supportive Housing</b></p> <p>To accommodate transitional and supportive housing, the City will amend its zoning ordinance in accordance with Government Code Section 65583(a)(5) to consider transitional housing and supportive housing as a residential use of property, subject only to those development standards that apply to other residential dwellings of the same type in the same zone.</p> <p>In addition, definitions for “transitional housing” and “supportive housing” will be revised consistent with Government Code Section 65582.</p>	<p>To accommodate the development of transitional and supportive housing in compliance with State law</p>	<p>The City began efforts in 2014 to draft and adopt an Ordinance amendment to bring the City in compliance with State law regarding transitional and supportive housing.</p> <p>in 2017, the "Citrus Shelter", a 56 bed emergency shelter for homeless families received final building inspections and successfully began operation.</p> <p>In 2019, the City discussed preparation of this Ordinance Amendment but was unable to focus on this effort due to limited staff resources. The Ordinance remains a priority and revisions are expected to be completed in 2020.</p>	<p><b>On-going.</b> This program has not yet been completed.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 22: Monitoring and Preservation of “At-Risk” units</b></p> <p>The City currently has 97 units that are at risk of converting from affordable, deed-restricted units to market-rate units during the planning period. The City shall provide for regular monitoring of deed-restricted units that have the potential of converting to market-rate during the planning period. Additionally, the City will provide technical assistance for owners of these units seeking funding and other opportunities to extend and/or renew deed restrictions and/or covenants.</p>	<p>Monitor and preserve 97 at-risk units</p>	<p>The City continues to monitor potential "At-Risk" units. From 2014 to present, the following units were at-risk of converting to market rate:</p> <p>Eight (8) units at the Friendly Center (451-453 N. Lemon Street) are identified in the Housing Element as at-risk of converting to market rate units. These units are being preserved through the Section 8 Annual Renewal Program. The current contract runs through May 2020.</p> <p>Triangle Terrace is a 75 unit apartment project located at 555 S. Shaffer Street. As recently as 2016, the apartments were at risk of converting to market rate units. However, in 2017, the owner secured a 20 year housing Assistance payments contract with HUD for Section 8 project-based rental assistance to extend affordability through November 2036. Because the owner has a 20 year Housing Assistance payments contract with HUD through November 2036, this project is no longer an at risk project.</p> <p>Forty (40) units at Casas Del Rio (1740 E. La Veta Avenue) were at risk of converting in 2017. The owner obtained a new five-year Housing Assistance Payments (HAP) contract effective October 26, 2017 through October</p>	<p><b>On-going.</b> The City has successfully worked with property owners managing affordable rental units within Orange that have recently been at risk of converting to market-rate units and successfully negotiated funding for both short- and long-range extensions to keep these units affordable.</p> <p>Long-term solutions are being sought for all sites. The City will continue to seek opportunities to preserve "At-Risk" housing units during the 6th Cycle RHNA planning period.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
		<p>26, 2022. The City is currently working on an extended agreement for these units.</p> <p>Seventy-five units at Casa Ramon (840 West Walnut) were at risk of converting. The owner had a multi-year HAP contract with HUD for Section 8 project-based rental assistance that was scheduled to expire in 2020. The owner requested a new multi-year contract with HUD to extend the contract. In 2016 the City authorized the issuance of tax exempt bonds and supported a tax credit application for the project. The owner obtained a new 20-year HAP contract effective March 1, 2017 through March 1, 2037. The tax credits require a 55-year affordability term for all of the units, which is secured by recorded covenants.</p> <p>Community Garden Towers is a 332 unit apartment project located at 3919 and 4001 West Garden Grove Boulevard. The units were at risk of converting to market rate units in 2022. However, in 2017, the property was refinanced and a new 20 year Housing Assistance Payment (HAP) contract with HUD will extend the Section 8 project-based rental assistance through January 26, 2037. Because the owner has a 20 year HAP contract with HUD through January 26, 2037, this project is no longer an at risk project.</p>	



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
<p><b>Policy Action 23: In-Kind Technical Assistance</b></p> <p>Continue to offer in-kind technical assistance on a request basis for property owners pursuing improvements that enhance the quality of the City’s housing stock.</p>	<p>Technical Assistance</p>	<p>City staff continues to offer Planning, Building, and Economic Development technical assistance at the public counter for housing development and enhancement projects.</p>	<p><b>On-going.</b> City staff will continue to provide technical assistance to the community. As technological advances and social practices change, the City will adapt to be able to continue to provide these services.</p>
<p><b>Policy Action 24: Proactive Code Compliance for Private Property</b></p> <p>Continue to address code violations and deferred maintenance and encourage continued maintenance of existing neighborhoods.</p>	<p>Monitor Neighborhoods and Address Code Violations</p>	<p>Code Enforcement staff continue to partner with the Orange Police Department on annual programs addressing areas where housing conditions and deferred maintenance are of concern.</p> <p>During the 5th Cycle RHNA planning period, thousands of cases involving property maintenance, inoperable vehicles, and general code enforcement complaints and violations were opened annually.</p>	<p><b>On-going.</b> Code Enforcement staff and the Orange Police Department successfully investigated and addressed hundreds of complaints and violations over the course of the planning period.</p>
<p><b>Policy Action 25: Blight Removal on Public Property</b></p> <p>To enhance the quality of Orange’s residential neighborhoods, the City will continue to utilize the Public Works and Community Services Departments for the as-needed removal of graffiti and other deferred maintenance issues on public property, including sidewalks, parks, bus</p>	<p>As needed</p>	<p>The City’s Public Works and Community Services Departments continue to maintain public property and address deferred maintenance issues, including on sidewalks, parks, bus shelters and signs. City staff strives to remove graffiti within 48 hours.</p> <p>Since the beginning of the planning period, the City has removed an average of 110,000</p>	<p><b>Completed.</b> The City’s Public Works and Community Services Departments have successfully addressed deferred maintenance and vandalism issues throughout the planning period.</p>



**Table A-1: Review of 5<sup>th</sup> Cycle Programs**

Policy Action	Objective	Program Accomplishments	Status for Sixth Cycle
shelters signs and other structures adjacent to the public right-of-way.		square feet of graffiti from areas visible from the public right-of-way and public parks.	
<p><b>Policy Action 26: Preservation of Historic Residential Structures</b></p> <p>The City places high priority to the conservation, preservation and enhancement of the City’s historic residential neighborhoods. The City will continue to enforce the goals and objectives contained in the Cultural Resources and Historic Preservation Element of the General Plan and the Historic Preservation Design Standards for Old Towne to ensure the continued quality of the City’s historic residential resources and maintenance of the City’s existing housing stock. In addition, the City will continue to promote the Mills Act Program and develop public information and outreach materials.</p>	<p>Preserve historic residential structures</p>	<p>The City continues to incentivize preserving historic residential structures through our Mills Act program and enforcement of the Old Towne Design Standards for projects located within the Old Towne Orange Historic District. The City does not currently limit the number of annual Mills Act applications.</p> <p>Since the beginning of the planning period, the City has approved 100 new Mills Act Contracts. Most recently in 2019, the City approved 54 new Mills Act Contracts.</p> <p>In 2017, the City updated and adopted the Old Towne Design Standards to further preserve and protect the historic nature of the Old Towne area.</p> <p>In 2018, the City adopted the Orange Eichler Design Standards and created a historic overlay district overlay zone for the three midcentury modern Eichler Homes Tracts. Contributing homes in the Eichler historic overlay district zone will be able to submit Mills Act applications beginning in 2019.</p>	<p><b>On-going.</b> The City has been incredibly successful at taking action to preserve the historic nature for the community. The City will continue to promote the Mills Act Program in the 6th Cycle RHNA planning period.</p>

# Appendix B: Candidate Sites Analysis





# Candidate Sites Analysis

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## A. Candidate Sites Analysis Overview

The Housing Element is required to identify sites by income category to meet the City's RHNA Allocation. The sites identified within the Housing Element represent the City of Orange's ability to develop housing at the designated income levels within the planning period (2021-2029). These sites are either residentially zoned or within a mixed-use zone that permits residential uses.

**Table B-1** shows the City's 2021-2029 RHNA need by income category as well as a breakdown of the sites identified to meet that need. The analysis within **Appendix B** shows that the City of Orange has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of additional capacity on existing residentially and mixed-use zoned sites. Sites identified to meet the lower income need are identified on sites that permit at least 30 dwelling units per acre.
- Future development of accessory dwelling units (ADUs)

### **Water, Sewer, And Dry Utility Availability**

Each site has been evaluated to ensure there is adequate access to water and sewer connections as well as dry utilities. Each site is situated with a direct connection to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate site.

### **Accessory Dwelling Units (ADUs)**

As a result of new legislation and an increased effort by the City to promote ADUs, the City has seen an increase in ADU permitting and applications over the past couple of years. The City had 27 ADUs approved for development in 2020, 111 approved in 2021, and [112 approved in 2022](#). The City has taken the following actions to promote and facilitate the development of ADUs:

- Dedicated expert staff for processing all ADU and JADU applications, and to offer pre-application assistance
- Dedicated staff to maintaining ordinances consistent with ADU State Law and to monitor HCD guidance documents
- Utilization of an ADU/JADU application with clear instructions on required application materials and necessary plan content
- Compliance with administrative approval of ADU/JADU applications withing required timelines
- Creation of ADU scenario site plans that will be offered as counter handouts and will be placed on the City website in 2022
- Omitted or reduced impact fee collection, consistent with State ADU Law
- Providing deed restriction assistance through providing required language
- Initiating affordability surveying beginning in 2022
- Waiving parking requirements for most ADUs, consistent with State ADU Law



In accordance with State law, ADUs are allowed in all zones that allow single dwelling unit or multiple dwelling unit development. Junior Accessory Dwelling Units (JrADUs) are permitted only in single dwelling unit zones.

The City of Orange has determined based on past performance and HCDs approved methodology that it is appropriate to anticipate the development of 40 accessory dwelling units per year from 2021 to 2029 for a total of 320 ADUs. **Housing Program 2J and 2K in Section 4: Housing Plan** of this Housing Element establish the monitoring of ADU development and continued compliance with State laws. The City will evaluate the production of ADUs within two years of adoption of the Housing Element and take action within 6 months to ensure adequate capacity at each income level to meet the City’s RHNA.

<b>Table B-1: Summary of RHNA Status and Sites Inventory</b>					
	Extremely Low/ Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
2021-2029 RHNA	1,067	604	677	1,588	3,936
RHNA Credit (Units Built)	--	--	--	--	--
<b>Total RHNA Obligations</b>	<b>1,067</b>	<b>604</b>	<b>677</b>	<b>1,588</b>	<b>3,936</b>
<b>Sites Available</b>					
Residential Zones	0	0	0	81	81
NMU-24	16	4	114	0	134
Urban Mixed Use (UMU)	1,025	478	618	1,696	3,817
<b>Total Potential Capacity Based on Existing GP and Zoning</b>	<b>1,041</b>	<b>482</b>	<b>732</b>	<b>1,777</b>	<b>4,032</b>
Accessory Dwelling Unit Production	80	137	96	7	320
<b>Total Sites Available</b>	<b>1,121</b>	<b>619</b>	<b>828</b>	<b>1,784</b>	<b>4,352</b>
<b>Potential Unit Surplus</b>	<b>+54</b>	<b>+15</b>	<b>+151</b>	<b>+196</b>	<b>+416</b>

## **B. Sites Inventory – Realistic Capacity**

This section contains a description and listing of the candidate sites identified to meet the Orange’s very low and low income RHNA need. A full list of these sites is presented in **Table B-3**.

The City of Orange has identified sites with capacity to accommodate the City’s 2021-2029 RHNA. This capacity is based on existing zoning and does not require the City to complete rezones in order to add capacity to what currently exists. The City has identified mixed-use zoned parcels that permit development at up to 60 dwelling units per acre which can accommodate 1,503 dwelling units. The City also anticipates the development of 217 affordable ADUs based on the methodology described in this section. This is in excess of the City’s 1,671 unit low and very-low RHNA need by 69 units, or an additional 4%. As demonstrated in this section, the City of Orange has the capacity to accommodate their RHNA need and believes based on past performance of developing affordable projects that this is an appropriate buffer should some sites not develop as anticipated. In addition, the City has made conservative unit yield assumptions, including:



- An assumption that projects within the Urban Mixed Use (UMU) zone, which is anticipated to accommodate the City's lower income RHNA need, will develop at 55 dwelling units per acre. Projects in this zone are permitted up to 60 dwelling units per acre and may go higher if they incorporate density bonus provisions.
- An assumption that only 25% of units included within a project will develop at the affordable levels. While it is likely that not all projects will develop with a 25% affordable component, the City has a history of building 100% affordable projects which can offset a potential deficit.

Orange is a primarily built out City with little available vacant land that can be developed for residential uses. Where possible, the City has identified vacant parcels as identified in **Table B-3**. As shown in **Table B-1**, all of the City's lower income RHNA need is anticipated to be accommodated within the UMU zone, which can accommodate development at up to 60 dwelling units per acre. **Table B-2** describes recent residential projects developed in the UMU zone, including the use prior to developing for housing and a project analysis which shows why these types of projects are good comparative examples of the types of residential the City anticipates in this zone during the 6<sup>th</sup> cycle planning period.

Chapter 17.19.010 of the City's Municipal Code states:

*It is the intent of this chapter to establish use regulations and development standards for the provision of adequate sites for the development for affordable housing in compliance with General Plan Policy D.17: Provide Adequate Sites of Housing Development.*

The definition of Urban Mixed Use within the City's zoning code is as follows:

*The UMU zoning district is intended to provide urban, high-intensity, regionally-oriented activity centers. This zoning district provides for integrated commercial retail, professional office, residential, and civic uses. Commercial retail uses are the preferred uses allowed on the ground floor. Residential development is allowed, either as part of a mixed-use project or as a freestanding use. Convenient transit access, innovative housing options, and pedestrian-oriented design are key considerations.*

The City does not currently have performance standards within the UMU zone which require residential, however, the City does have a process in place within Chapter 17.19.060 of the Zoning Code to ensure identified land remains available to meet the City's RHNA need. See below for full text of the Site Plan and Design Review Required within the UMU Zone.

*Depending on the nature of the development, a proposed project, including residential projects, may require review and approval in compliance with Sections 17.10.060 (Site Plan Review) and 17.10.070 (Design Review). However, residential projects are not subject to other non-design related discretionary review in compliance with Policy D.17 of the General Plan Housing Element.*

*For nonresidential and mixed-use projects within the UMU zoning district subject to site plan and/or design review, the reviewing body shall make the additional finding that approval of the project will not reduce the amount of land available in mixed use zoning districts to a point where the City's affordable housing needs under the Regional Housing Needs Assessment (RHNA) cannot be met. In compliance with Policy D.17 of the General Plan Housing Element (Policy Action 2H of the 2021-2029 Housing Element),*



at no time shall the capacity of available sites for affordable residential development be exceeded by the adjusted RHNA need.

As shown in **Table B-2**, the City of Orange has primarily seen development within the Urban Mixed-Use zone occur as fully residential projects, including the 1,659 units approved within the five sample projects shown. While the UMU zone does permit fully non-residential projects, the City rarely sees applications for projects which do not contain a residential component.

The very-low and low-income sites inventory within this appendices describes each of these sites, with information provided per the HCD required data tables. Dwelling unit yield for each of the parcels within this inventory were analyzed to determine a net parcel size based on the City's established definition of net acreage and known physical and environmental constraints.

Non-vacant sites designated to meet the very-low and low-income RHNA need that have been identified in a previous Housing Element and vacant sites designated to meet the very-low and low-income RHNA need that have been identified in two previous Housing Elements will also allow 'by-right' approval for any project with 20 percent low income housing that does not involve a subdivision per State law. This is described in **Program 2L** within the Housing Plan.

#### **Redevelopment of Non-Vacant Sites for Residential Uses**

The City's does not have sufficient vacant land available to accommodate fifty percent of their low/very-low income RHNA. To accommodate the need at those income levels, the City has analyzed sites within the Urban Mixed Use (UMU) zone. The City has evaluated recent projects that have redeveloped within the UMU zone that included residential units. Those projects, including the use prior to redevelopment and a project analysis of the approved development plan, are shown in **Table B-2**. The City's analysis shows that prior uses on these redeveloped sites were similar in nature to the existing uses on sites identified within the sites inventory in **Table B-3**.

The City has also conducted a parcel specific analysis of existing uses for each of the identified sites. This analysis of existing uses, including indicators of a likelihood that the existing use will redevelop within the next eight years, are provided in **Table B-3**. This analysis is based on information readily available to the City and research that can be found through online research.

The following residential development projects have been constructed within the City's Urban Mixed Use zone:



Project Address/ APN	Dwelling Units	Zoning	Use Prior to Redevelopment	Project Analysis
3537 The City Way/ 23106137	334	UMU	Surface parking lot for medical, hotel and office buildings.	AMLI Apartments. 4-story wrap apartment project developed at 60 du/ac. The project was completed in 2017 and achieved the maximum density. Developed directly adjacent to the Outlets at Orange
1110 Town and Country Road/ 39062102	260	UMU	Vacant lot adjacent to an existing office tower (underdeveloped office tower Phase II)	Eleven10 Apartments. 5-story podium apartment project developed at 60 du/ac. Project site is adjacent to existing office and commercial uses. The project was completed in 2018 and achieved the maximum density. The project was developed as horizontal mixed-use with existing office uses.
1055 Town and Country Road/ 04121405	262	UMU	Surface parking lot for existing office building.	Cameo Apartments. 5-story apartment project developed at 44 du/ac. Recently completed in 2020. The project was developed as horizontal mixed-use with existing office uses.
1725 W. Katella/ 27530106	94	UMU	Low-rise light industrial/office building with surface parking lot	Branch West (aka Garrison Apartments). Apartment building is a podium product involving a development agreement to allow a transfer of development rights from an adjacent City water well site to exceed the General Plan's maximum 60 du/acre density. This project was entitled at 85 dwelling units per acre. Final certificate of occupancy pending.
702-1078 Town and Country Road/ 04121305	709 (635 Apartments & 74 Townhomes)	UMU	Low-rise office park with surface parking lot	Fairfield Apartments and Tri-Point Townhomes. Developed at 60 du/ac. Apartments are developed in two separate buildings; one with 295 units and the other with 358 units. Both apartment buildings wrap multi-level parking structures.

These projects demonstrate that there is a recent history of successfully developing residential units within the Urban Mixed Use within Orange. Three of the five projects shown developed at the maximum density permitted of 60 dwelling units per acre while one developed above that density at 85 du/ac. While these horizontal mixed-use projects were originally proposed at densities lower than permitted, the City averages the density over the entire horizontal mixed use site in order to accommodate the residential infill. Additionally, the City requires access easements for parking and emergency access in perpetuity in order to justify the properties as integrated mixed use sites. Based on the size of the parcel that is created for the residential component of these projects, all mixed-use projects exceed the allowable density. The City does not receive applications to develop at densities below that permitted. The remaining project listed in **Table B-2** developed under the maximum density at 44 dwelling units per acre due to retaining



existing office uses onsite. A workforce housing study determined that all of the sample projects shown in **Table B-2** were affordable at the moderate income level.

Furthermore, only one non-residential project was submitted during the 5<sup>th</sup> Planning Cycle. This included 60,000 square feet of commercial space, parking, and valet. When compared to the six residential projects listed in **Table B-2**, the City shows a high likelihood of developing residential uses in the UMU zone.

To accommodate the potential for lower densities due to a mixture of uses onsite, the City has made assumptions based on a reduced 55 dwelling units per acre as described previously in this appendix. This is a conservative estimate as the examples show that most projects developed in the UMU zone do so at or above the maximum density. The **Housing Plan** section outlines actions the City will take to promote the development of affordable units within the mixed used areas.

### **Non-Vacant Development Scenarios**

The City has confidence that infill housing has great potential to come to fruition on the identified sites due to the fact that they have experienced successful “horizontal” mixed use development on surface parking lots associated with existing office development on Town and Country Road. As indicated previously, hundreds of housing units were developed on Town and Country Road in the span of two city blocks in this manner. The residential projects approved around the Outlets at Orange involved “opportunity sites” that were surface lots and would have accommodated hundreds of units. The sites identified for the 6th Cycle continue to have this potential with the coming together of the right property transaction and stabilization of construction costs. City staff continues to receive inquiries about the development potential of the identified sites, and is also actively making contact and developing an outreach program to encourage infill housing on the subject sites. Furthermore, with significant development and employment planned in the immediate future across the City boundary in Anaheim (OCVibe), we expect this to serve as a catalyst for more residential development in Orange. We have been planning for this type of development since 2010. It has come to fruition in some areas of the City more rapidly than others. Where it has been slower to emerge is where there is interest, but property ownership or lease arrangements that have been slower to reach a point of “readiness”. City staff continues to offer creative zoning code interpretations for site redevelopment that includes housing as property owners and developers come forward with inquiries. As indicated in our previous responses to HCD, here are some specific examples of how we have seen our “opportunity sites” develop and why we know this approach works and is realistic:

- **Cameo Apartments:** The project involved development of a horizontal mixed-use development project by constructing (1) a new five-story, 262-unit residential apartment building surrounding a six-level parking structure, (2) a new five-level parking structure to serve an existing office building, and (3) related site improvements providing landscaping and resident amenities on a six-acre project site. The apartments and office parking structure infilled surface parking that had served the original office building. In the case of the apartment footprint, if taken as a stand-alone parcel, the apartment density would have exceeded the maximum allowed in the City’s General Plan. Therefore, the city established a practice of averaging the residential density over the overall site (encompassing the office, apartment, and parking structure) to achieve a condition where the residential density was averaged over the entire site to avoid the density conflict. Since



its completion, a portion of the units have become income-restricted to moderate income households.

- **Eleven10 Apartments:** The project involved residential infill on a portion of a 5.75-acre site that was already developed with a 16-story office building constructed in the late 1980's. The development footprint consisted of 2.76 acres of the site that had been prepared for construction of a second office tower that was never developed. The 260 units of infill apartments was built as a podium type project, with four residential levels of living space situated over a two and one-half level parking structure. As with the Cameo Apartments project, the residential density was averaged over the larger horizontal mixed-use site to achieve a density condition that complied with the General Plan. Otherwise the project density would have exceeded the maximum allowed in the General Plan.
- **Fairfield Apartments and Trio Townhomes:** The project involved redevelopment of an underutilized office complex with a 727-unit apartment and townhome development (653 apartments and 74 townhomes). The apartment units are configured around multi-level parking structures. This site was originally not contemplated for the scale of development that came forward. The development potential that was realized is a reflection of the job-rich context of the location, being within walking distance of high-rise office development and within a short distance of the Children's Hospital of Orange County and St. Joseph Medical Center campuses, as well as the Orange County Transportation Authority headquarters.
- **Branch West (Garrison) Apartments:** This project involved the redevelopment of a light-industrial complex with a 94-unit apartment complex with podium parking. Due to the fact that the density proposed by the applicant exceeds the allowable density under the General Plan, the application includes a development agreement involving the transfer of development rights for 28 of the 94 units from a portion of the adjacent City water well property to the subject site. In exchange for this development rights transfer the applicant provided public benefits in the form of traffic signal, sidewalk, and streetscape improvements in the immediate project vicinity. Since the project's completion, a portion of the units have become income restricted for moderate income households.

These examples demonstrate that City's experience in developing UMU zoned sites that were previously parking lots as well as existing commercial and office developments. These are all in close proximity to the majority of the candidate housing sites and share common characteristics. Combined with developer interest in the identified parcels, the City anticipates significant growth in housing opportunity at all income levels on the identified candidate housing sites within the housing element inventory. For further analysis, see the individual projects notes within **Table B-3**.

#### Development of Large Site Parcels

Supplemental to the sites identified to meet the City's lower income RHNA allocation which fall within AB 1397 criteria, the City has identified two parcels which are larger than 10 acres.



Parcel 23113140 (1 City Blvd. West) is located adjacent to the Outlets property and has an existing DA agreement which is set to expire in 2021. The City has previously processed a mixed-use application on this site with a proposed 300+ residential units; the application is currently on hold. The City assumes that a net acreage of approximately 9.95 acres of this property will redevelop and that some portion of the existing development may remain for existing or non-residential uses.

Parcel 37530116 (1547 W Katella Ave.) includes an existing shopping center with a movie theatre, restaurants, and smaller commercial shops. The majority of the center is made up of surface parking that goes unused as the surrounding uses contain dedicated parking. The Housing Element proposes to maintain the existing uses and incorporate residential units in a mixed-use fashion in the existing parking lot area only.

The City has recently approved two projects with income-restricted units on lots greater than 10 acres. These include:

- Terrace Apartments Expansion – 167 units on 16.9 acres
- Fairfield – 727 units on 12.13 acres

The City has approved 4 addition project with income-restricted units on 1.1 to 8.94 acres lots and 4 affordable housing projects on 0.5 to 3.54 acre lots.

#### Lease Analysis

Existing lease agreements on infill and non-vacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the City to consider lease terms in evaluating the use of non-vacant sites, however the City does not have access to private lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the City has conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period, including past performance, an on-the ground existing use analysis and a market analysis to understand cost of land, construction, and development trends in Orange.

#### Existing Uses on Candidate Sites and Redevelopment Opportunity

The City has identified and analyzed existing use on candidate sites in **Table B-3** below. As the City is a built-out community, consisting mainly of commercial retail, industrial and single-family housing, a primary goal was to identify sites compatible for the development of multifamily and mixed-use housing as well as to not displace existing residents. Therefore, the City identified the best possible sites with the most feasible opportunity for redevelopment over the next eight years. In addition to the analysis in **Table B-3** the City utilized locally available SCAG data to identify the following key indicators that the sites included for low and very low-income opportunity are the most appropriate:

- On average, there are 106 healthcare facilities within a one-mile drive from each of the identified sites
- On average, there are .5 to 1 grocery stores or markets within a one-mile drive from each of the identified sites
- On average, there are 13 open space areas within a one-mile drive from each os the identified sites



- 98 percent of the sites identified are within a High-Quality Transit area, meaning the 98 percent of sites are within one half-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

### Housing Market Analysis

In addition to an on-the-ground existing use analysis, the City of Orange has market conditions to facilitate the redevelopment of non-vacant sites for residential. **Table B-2** above shows that a total of 1,659 dwelling units have been constructed through redevelopment in the City. Additionally, a California Association of Realtors report for Historic Housing trends shows that the average time a unit spends on the market in Orange County is just 18.6 days in the last four years (2017-2021) and just 13.3 days in the last two years.<sup>1</sup> Specifically in Orange, homes spent about 50 days on the market and the sale-to-list price ratio was 100.27%, indicating a sellers' market and the need for more housing.<sup>2</sup> According to the New Homes Directory (online resource), Historical Housing Market Data, the average price for an attached unit, 1,500 to 2,000 square feet or less, increased by 52 percent over the last planning cycle (\$456,127 in 2014 to \$695,110 in 2021).<sup>3</sup> The price for a detached unit increase by 59 percent during this same period from \$584,390 in 2014 to \$930,307 in 2021.<sup>4</sup> Additionally, the according to the CAR Current Sales and Price Statistical Survey, the median cost of a home for sale in Orange County increased by 20 percent from 2020-2021 (from \$930,000 in October 2020 to \$1,120,000 in October 2021).<sup>5</sup> The indicators above signify an increased market demand for new housing.

### Infrastructure Availability

As discussed in **Section 3**, each site has been evaluated to ensure there is adequate access to water and sewer connections. Each site is situated adjacent to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate site.

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<sup>1</sup> Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: December 15, 2021. <https://www.car.org/marketdata/data>

<sup>2</sup> Realtor.com, Housing Market Summary, Orange. Accessed Online: December 15, 2021. [https://www.realtor.com/realestateandhomes-search/Orange\\_CA/overview](https://www.realtor.com/realestateandhomes-search/Orange_CA/overview)

<sup>3</sup> New Homes Directory.com, Historical Housing Report in Orange, Accessed Online: December 15, 2021. <https://www.newhomesdirectory.com/California/Orange/historical-housing-report>

<sup>4</sup> IBID.

<sup>5</sup> Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: December 15, 2021. <https://www.car.org/marketdata/data>



**Figure B-1: Map of Identified Sites (All Income Levels)**

**City of Orange Sites**

--- City Boundary

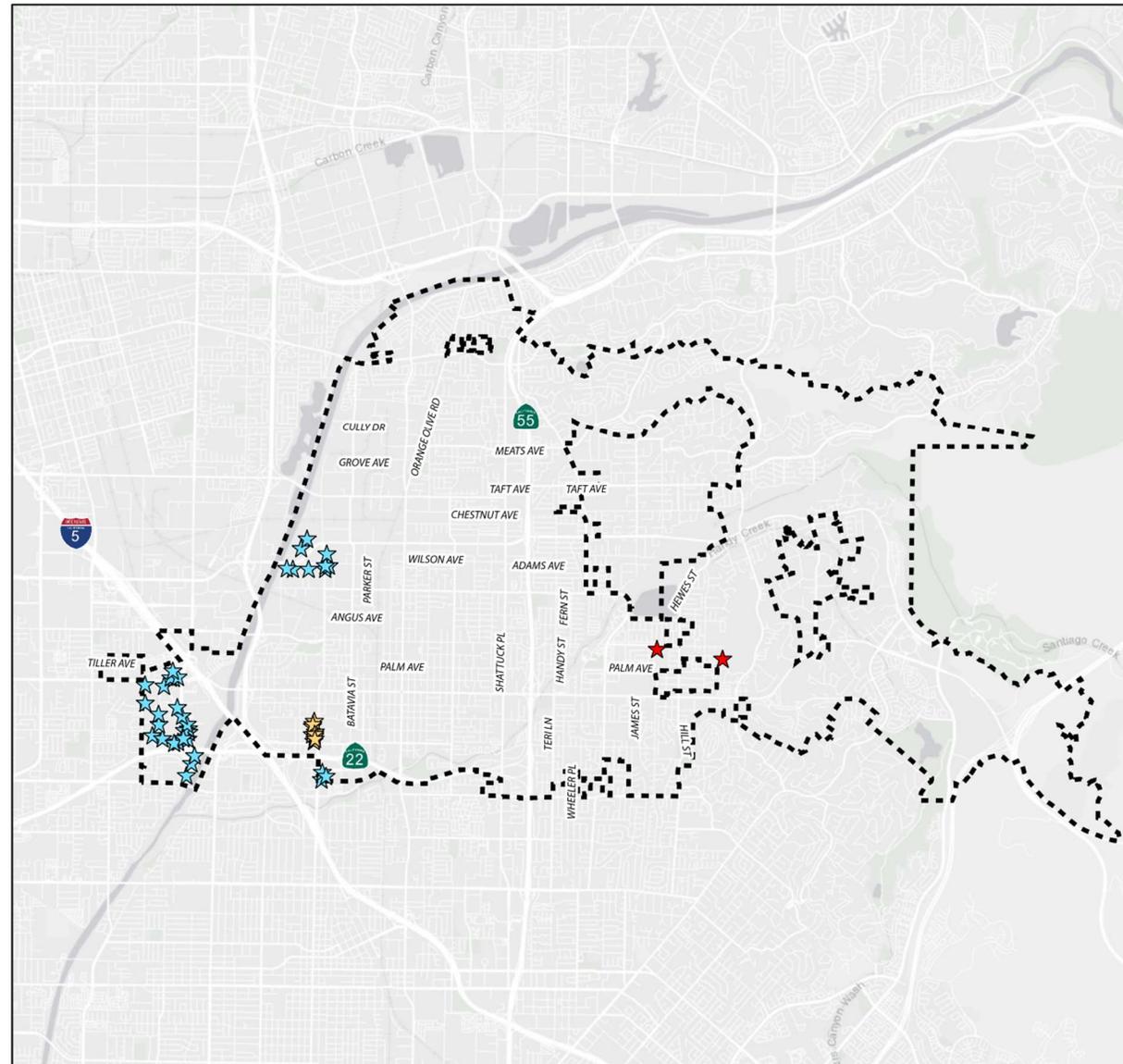
**Proposed Sites**

**By Income Category**

★ Above Moderate

★ Moderate

★ Low/Very low



Sources: American Community Survey;  
HUD Exchange;  
City of Orange



## C. Moderate and Above Moderate Sites Inventory

This section contains a description and listing of the candidate sites identified to meet the City of Orange’s moderate and above moderate income RHNA need.

### Calculation of Unit Capacity

The capacity for sites identified to meet the City’s moderate and above moderate RHNA need was determined by multiplying the net parcel size by the reasonably achievable density (consistent with the assumptions within the City’s adopted Land Use Element) for that zoning designation and rounding down to the nearest whole dwelling unit. In taking this approach, the City is using a conservative methodology. In many instances, future development may occur at a density greater than assumed within this analysis, up to the maximum density allowed by the individual zone. Where information is known, acreage has been netted out for potential constraints to development.

### Selection of Sites

This appendix contains a selection of those sites that are most likely to be developed for moderate and above-moderate income housing. For the purpose of identifying sites with the potential to be redeveloped within the planning period, this analysis considered existing zoned parcels that permit residential as a standalone use within the following zones based on reasonable assumptions for densities within those zones, consistent with the City’s Land Use Element:

- Moderate:
  - UMU, Urban Mixed Use
  - NMU-24, Neighborhood Mixed Use District – 24 du/ac
- Above Moderate
  - UMU, Urban Mixed Use

The City understands that multi-family projects often develop at above moderate or moderate levels with an affordable component. Some of the sites identified below were also identified to meet the City’s lower income RHNA needs. The City calculated a maximum achievable density based on reasonable assumptions of density and then determined the affordable component as described in Section B of this appendix. Units were not double-counted and the sum of the affordable and market-rate units does not exceed the maximum number of units permitted for any candidate site.

For the purposes of this analysis, accessory dwelling unit potential was calculated separately as outlined within the Candidate Sites Analysis Overview section above. ADUs represent additional potential units to meet the City’s RHNA.



Table B-3: Sites to Accommodate the RHNA

APN	Area (Ac)	Zoning	GPLU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
37530116	9.95	UMU	UMIX	55	1547 W KATELLA AVE	STADIUM PROMENADE LLC BRECKENRIDGE GROUP INC		547	136	411	92	43			Existing shopping center with movie theater and small out parcel uses, including restaurants and small commercial shops. The vast majority of the site is surface parking that goes unused as the surrounding uses contain dedicated parking. The Housing Element analyzes the potential redevelopment of the area while maintaining the existing uses or incorporating them in a mixed-use fashion and only considers the existing parking lot area.	136,005	1,300,266	10%
23113140	9.95	UMU	UMIX	55	1 CITY BLVD WEST	WALTON/GREENLAW CITY PLAZA HOLDINGS VI LLC		547	136	411	92	43		412	Existing 19-story office building with large older surface parking lot. Located directly adjacent to Outlets property. Existing DA expires this year and City has previously processed an application for mixed-use development on this site, including residential units. That application is currently on hold. The City assumes that a net acreage of approximately 9.95 acres of this property will redevelop.	19,710	1,300,266	2%
37531125	9.56	UMU	UMIX	55	1701 W KATELLA AVE	STADIUM PROMENADE LLC BRECKENRIDGE GROUP INC		526	131	395	89	42			See explanation for Parcel 37530116.	136,005	1,249,875	11%
09314149	9.17	R-1-7	PFI	6	515 N Rancho Santiago Blvd	SCHOOL ORANGE UNIFIED DIST		55	0	55	9	4		55	Largely vacant lot with some agricultural uses and one small structure.	#N/A	1,198,336	#N/A
37537105	8.32	UMU	UMIX	55	1600 W STRUCK AVE	ORANGELAND RECREATION VEHICLE PARK		457	114	343	77	36			Existing RV parking lot. City has recently rezoned the W Katella Ave corridor as it has been identified as a large opportunity area for mixed-use development, including multi-family residential.	48,902	1,087,854	4%
37501119	7.61	UMU	UMIX	55	1350 W KATELLA AVE	WILSON DAVID W TR		418	104	314	71	33			Existing car dealership on large parcel. Parcel is primarily surface parking and display area. City has recently rezoned the W Katella Ave corridor as it has been identified as a large opportunity area for mixed-use development, including multi-family residential.	83,558	994,702	8%



Table B-3: Sites to Accommodate the RHNA

APN	Area (Ac)	Zoning	GPLU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
23106152	5.91	UMU	UMIX	55	LEWIS ST	REGENTS OF THE UNIVERSITY OF CALIFORNIA	Yes	324	81	243	55	25	244		Existing UCI MDA ALS Clinic with very large surface parking lot. Development potential considers the potential for existing use to remain and residential added in a mixed-use fashion.	20,044	772,135	3%
39062104	5.78	UMU	UMIX	55	763 S MAIN ST	TOWN & COUNTRY SPE	Yes	317	79	238	53	25		239	Commercial shopping center with large big box stores and large surface parking lot. Pier 1 Imports building and one smaller tenant currently vacant. Directly adjacent to new multi-family residential development and across from the MainPlace mall (Santa Ana) analyzed in the Housing Element.	66,917	755,281	9%
23113132	5.10	UMU	UMIX	55	LEWIS ST	ORANGE CITY MILLS III LIMITED PARTNERSHIP	Yes	280	70	210	47	22		211	See explanation for Parcel 23107129.	0	666,158	0%
09351127	4.40	R-1-7	PFI	6	4100 E WALNUT AVE	CUMMINS KENNETH J TR GLORY B LUDWICK REVOC LIVING TR		26	0	26	4	2		26	Single-story charter school with large open space area.	47,964	574,992	8%
23126207	4.33	UMU	UMIX	55	625 THE CITY DR S	THE REALTY ASSOCIATES FUND XI PORTFOLIO L P	Yes	238	59	179	40	19	179		Existing older 4-story office building with ample surface parking. Large site with potential for joined redevelopment with adjacent parcels and accessibility to walking/biking trails.	37,089	566,362	7%
13747134	3.99	UMU	UMIX	55	LEWIS ST	CITY TOWN CENTER L P		219	54	165	37	17		165	Best Buy big box store and surrounding parking. Adjacent to multi-family residential across the street and has the potential to redevelop due to market trends away from large retail big box stores. Similar parcels in the area such as the ones analyzed have redeveloped for higher density residential uses.	45,438	521,520	9%
23108156	3.98	UMU	UMIX	55	3901 W METROPOLITAN DR	ORANGE CITY MILLS LTD PTNSHP		219	54	165	37	17		165	See explanation for Parcel 23107129.	32,385	520,715	6%
23126208	3.53	UMU	UMIX	55	765 THE CITY DR S	AG CITY OWNER L P	Yes	194	48	146	32	15	147		Existing older 4-story office building with ample surface parking. Large site with potential for joined redevelopment with adjacent parcels and accessibility to walking/biking trails.	23,681	461,245	5%
37536102	3.51	UMU	UMIX	55	1900 W KATELLA AVE	COUNTY OF ORANGE		193	48	145	32	15			Existing County of Orange training bureau and surface parking lot. City has recently rezoned the W Katella Ave corridor as it has been identified as a large opportunity area for	55,479	458,950	12%



Table B-3: Sites to Accommodate the RHNA

APN	Area (Ac)	Zoning	GPLU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
															mixed-use development, including multi-family residential.			
23107154	2.67	UMU	UMIX	55	3400 METROPOLITAN	ORANGE CITY MILLS II LIMITED PARTNERSHIP		146	36	110	24	11			See explanation for Parcel 23107129.	0	348,939	0%
23107131	2.40	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP	Yes	132	33	99	22	10			See explanation for Parcel 23107129.	11,775	314,243	4%
23107153	2.08	UMU	UMIX	55	W METROPOLITAN DR	ORANGE CITY MILLS LTD PARTNERSHIP		114	28	86	19	9			See explanation for Parcel 23107129.	0	272,454	0%
39027412	1.90	NMU-24	NMIX24	16.3	310 S MAIN ST	MAIN STREET PROPERTIES		30	0	30	5	2	30		Small older commercial shopping center with potential to redevelop for mixed-use.	31,163	247,944	13%
23107126	1.84	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP	Yes	101	25	76	17	8			Surface parking lot/outparcel for the Outlets at Orange shopping center. The Housing Element analysis looks at a potential redevelopment of a portion of the Outlets to include residential uses and structured parking. The analysis assumes that the existing mall core building remains intact and looks at multiple examples of nearby mall redevelopment plans. There are currently no public planning efforts to redevelop the mall though the zoning would permit it and the large surface parking lots provide ample opportunity without impacting the City's tax base and existing uses on-site.	0	240,394	0%
23107133	1.69	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP	Yes	92	23	69	15	7			See explanation for Parcel 23107129.	10,152	220,770	5%
13747143	1.68	UMU	UMIX	55	3737 W CHAPMAN AVE	F H A LP		92	23	69	15	7		70	Existing ALO hotel and one-story restaurant with surrounding surface parking lot. Potential to redevelop either restaurant portion or entire site.	20,437	219,895	9%
23106146	1.66	UMU	UMIX	55	4125 LEWIS ST	WALWORTH RICHARD R TR	Yes	91	22	69	15	7		69	Several single-family residences on a single lot with storage and large surface parkign areas. Existing units have been accounted for and property is directly adjacent to newer multi-family residential uses.	12,765	216,830	6%



Table B-3: Sites to Accommodate the RHNA

APN	Area (Ac)	Zoning	GPU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
23107143	1.44	UMU	UMIX	55	450 THE CITY DR S	SCHIFFMAN TODD I TR CARL KARCHER ENTERPRISES INC		79	19	60	13	6			See explanation for Parcel 23107129.	5,803	188,046	3%
23107140	1.39	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP		76	19	57	12	6		58	See explanation for Parcel 23107129.	0	181,362	0%
23106153	1.30	UMU	UMIX	55	4050 W CHAPMAN AVE	BARD ASSOCIATES CO	Yes	71	17	54	12	5		54	Older restaurant building (Lucille's BBQ) with a large surface parking lot. Potential to redevelop for mixed-use and retain capacity for the existing use and additional commercial.	7,153	169,279	4%
23107147	1.29	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP		70	17	53	11	5		54	See explanation for Parcel 23107129.	0	168,604	0%
39062103	1.27	UMU	UMIX	55	745 S MAIN ST	ORANGE TOWN & COUNTRY #3 LLC	Yes	69	17	52	11	5		53	Commercial shopping center with multiple tenants and large surface parking lot. Directly adjacent to new multi-family residential development and across from the MainPlace mall (Santa Ana) analyzed in the Housing Element.	16,221	165,630	10%
39062105	1.25	UMU	UMIX	55	791 S MAIN ST	WANG CHARLES S C TR WANG FAMILY TR	Yes	68	17	51	11	5		52	See explanation for Parcel 39062104.	19,249	162,997	12%
23107132	1.19	UMU	UMIX	55	330 S THE CITY DR	ORANGE CITY MILLS LTD PARTNERSHIP	Yes	65	16	49	11	5			See explanation for Parcel 23107129.	4,616	155,612	3%
37537110	1.16	UMU	UMIX	55	1748 W KATELLA AVE	ORANGE KATELLA LLC		63	15	48	10	5			Existing standalone surface parking lot. City has recently rezoned the W Katella Ave corridor as it has been identified as a large opportunity area for mixed-use development, including multi-family residential.	0	152,032	0%
23109201	1.15	UMU	UMIX	55	THE CITY DR S	THE REALTY ASSOCIATES FUND XI PORTFOLIO L P	Yes	63	15	48	10	5	48		Surface parking lot adjacent to older multi-tenant office building. Large site with potential for joined redevelopment with adjacent parcels and accessibility to walking/biking trails.	0	150,094	0%
39028537	1.13	NMU-24	NMIX24	16.3	480 S MAIN ST	MP-LAVETA LLC	Yes	18	0	18	3	1	18		Small older commercial shopping center with potential to redevelop for mixed-use.	17,089	148,098	12%
37537402	0.98	UMU	UMIX	55	1095 N MAIN ST	HARVARD 826 PROPERTY LLC		53	13	40	9	4			Older 2-story commercial office building currently signed available for sale.	15,307	128,241	12%



Table B-3: Sites to Accommodate the RHNA

APN	Area (Ac)	Zoning	GPLU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
23113133	0.91	UMU	UMIX	55	LEWIS ST	ORANGE CITY MILLS III LIMITED PARTNERSHIP		50	12	38	8	4		38	See explanation for Parcel 23107129.	0	119,533	0%
39028534	0.83	NMU-24	NMIX24	16.3	424 S MAIN ST	MP-LAVETA LLC	Yes	13	0	13	2	1	13		Small older commercial shopping center with potential to redevelop for mixed-use.	19,731	109,044	18%
37537403	0.82	UMU	UMIX	55	1085 N MAIN ST	HARVARD 826 PROPERTY LLC		45	11	34	7	3			Older 2-story commercial office building. Common ownership and could be redeveloped in conjunction with Parcel 37537402 or independently.	13,014	106,990	12%
13747132	0.76	UMU	UMIX	55	3743 W CHAPMAN AVE	CITY TOWN CENTER L P	Yes	41	10	31	6	3		32	Existing commercial shopping center and surface parking lot containing a bank, Starbucks, and Quiznos Subs. Opportunity to develop in a mixed-use fashion similar to adjacent parcel which contains hotel and restaurant uses.	9,974	98,958	10%
39028532	0.68	NMU-24	NMIX24	16.3	402 S MAIN ST	MP-LAVETA LLC	Yes	11	0	11	1	0	11		Small older commercial shopping center with potential to redevelop for mixed-use.	3,909	89,513	4%
39028536	0.60	NMU-24	NMIX24	16.3	MAIN ST	MP-LAVETA LLC	Yes	9	0	9	1	0	9		Small older commercial shopping center with potential to redevelop for mixed-use.	17,089	77,922	22%
39028535	0.57	NMU-24	NMIX24	16.3	468 S MAIN ST	MP-LAVETA LLC	Yes	9	0	9	1	0	9		Small older commercial shopping center with potential to redevelop for mixed-use.	2,472	74,913	3%
39027411	0.57	NMU-24	NMIX24	16.3	356 S MAIN ST	WONG WAI PING INC	Yes	9	0	9	1	0	9		Small older commercial shopping center with potential to redevelop for mixed-use.	8,589	74,761	11%
13747133	0.57	UMU	UMIX	55	3739 W CHAPMAN AVE	CITY TOWN CENTER L P WENDYS INTERNATIONAL INC	Yes	31	7	24	5	2		24	Existing Wendy's restaurant and surface parking lot. Opportunity to develop in a mixed-use fashion similar to adjacent parcel which contains hotel and restaurant uses. May also be developed with 13747132 due to common ownership.	3,964	74,730	5%
39027410	0.57	NMU-24	NMIX24	16.3	370 S MAIN ST	HOU MARVIN L S	Yes	9	0	9	1	0	9		Small older commercial shopping center with potential to redevelop for mixed-use.	6,444	74,572	9%
23107129	0.51	UMU	UMIX	55	THE CITY DR S	ORANGE CITY MILLS LTD PARTNERSHIP	Yes	28	7	21	4	2			See explanation for Parcel 23107129.	0	66,759	0%



**Table B-3: Sites to Accommodate the RHNA**

APN	Area (Ac)	Zoning	GPLU	Expected Density	Address	Ownership	5th Cycle	Net Units	Affordable Units	Market Rate Units	Very Low Units	Low Units	Moderate Units	Above Moderate Units	Existing Uses and Redevelopment Analysis	Existing Building SF	Max Building SF	Percent Utilized
37505101	0.50	UMU	UMIX	55	1212 STRUCK AVE	B & B GARDNER LP		27	6	21	4	2			Older single-story office structures and maintenance sheds surrounded by large surface parking lot.	3,757	65,011	6%
39028533	0.41	NMU-24	NMIX24	16.3	MAIN ST	MP-LAVETA LLC	Yes	6	0	6	1	0	6		Small older commercial shopping center with potential to redevelop for mixed-use.	19,731	54,039	37%
											1054	488	732	1777				

# Appendix C: Summary of Community Engagement





# Summary of Community Engagement

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Section 65583 of the Government Code states that, "The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." Meaningful community participation is also required in connection with the City's Assessment of Fair Housing (AFH). A summary of citizen participation is provided below.

As part of the 6<sup>th</sup> Cycle Housing Element Update process, the City of Orange has conducted public outreach activities beginning in the fall of 2020. These recent outreach efforts included Community Workshops, City Council and Planning Commission workshops, digital media and engagement, and noticed Public Hearings. Project materials, including summaries from community workshops and public meetings, notices, and draft public review documents are available on the City's website:

<https://www.cityoforange.org/290/Current-Projects>.

Outreach for the 6<sup>th</sup> Cycle Housing Element to the Orange community includes the following actions:

- **Virtual Workshop Presentation** – On October 12, 2020, the City launched the Housing Element Virtual Workshop Presentation. This included a recorded informational presentation available on the Housing Element Update webpage and a fast sheet.
- **Community Workshop** – The City conducted a virtual community workshop on May 26, 2021. This workshop provided attendees with information about the Public Review Draft and opportunities for public participation. The workshop was advertised on the City's webpage and on social media platforms. Spanish translation services were available for the meeting.
- **Online Community Survey** – With the release of the Virtual Workshop Presentation on October 12, 2020, the City also launched an Online Community Survey available through November 15, 2020. There was a total of 148 persons who participated in the survey. Participants were asked to consider potential policies and programs to include in the Housing Element.
- **Stakeholder Meetings** – On December 1, 2020, the City held two stakeholder meetings with affordable and market-rate housing developers and with housing advocates and community groups. The purpose of these meetings was to solicit feedback about housing constraints, methods of promoting affordable housing, new or innovative housing trends, and engaging the faith-based community.
- **Housing Element Update Webpage** – A webpage developed for public consumption is available at this address: <https://www.cityoforange.org/290/Current-Projects>. The webpage provides relevant information about the update process, key features of the Housing Element, project timeline, and upcoming outreach events. The website also provides access to each virtual outreach event and the survey while it was ongoing.
- **Public Comments** – Through the update process, the City received a variety of comments and input from the public. Public participation and feedback help to guide the development of the



Housing Element, all public comments received by the Housing Element update team are compiled in this appendix.

As required by Government Code Section 65585(b)(2), all written comments regarding the Housing Element made by the public have previously been provided to each member of the City Council.

This appendix contains a summary of all public comments regarding the Housing Element received by the City during development of the Public Review Draft Housing Element. This includes feedback from the first virtual Community Workshop. This section will be updated following the second virtual Community Workshop prior to submittal to the State Department of Housing and Community Development (HCD) for review.

### **Outreach to Underrepresented Portions of the Community**

The City of Orange understands the importance of engaging all segments of the community, especially those who traditionally are underrepresented within long-range planning processes and those who may experience some sort of barrier to participation. This may be a language barrier, comfort level, or other responsibilities which conflict with public meetings/engagement efforts by the City. In the City of Orange, these groups are mostly comprised of residents living in disadvantaged areas such as the North Tustin Street corridor or non-English speaking residents throughout the City.

In order to reach those segments of the population, the City felt it was important to be strategic in outreaching to the organizations that are most engaged with the identified populations. For all workshops and draft documents, the City extended notifications to churches and service organizations that are engaged with the disadvantaged and/or non-English speaking segments of our population that may not have internet access or are adept at the use of electronic devices. The City made efforts to reach out to those groups early on in the Housing Element update process when conducting stakeholder meetings as well as some of the participants represented those contacts and were able to provide feedback as described in this appendix.

As noted below, all materials were provided in English and Spanish with translation services available in virtual meetings. The City received approximately five comments on the Public Review Draft in Spanish and translated them to review and consider. Understanding that the public workshop times do not work for everyone, the City recorded them and placed them on the City's website as well as made the community survey available for a month to promote as much engagement as possible. City staff was available at the planning counter to assist residents in taking the survey and translation services were available.

Additionally, direct feedback was obtained from the following groups. The City engaged additional church groups and local organizations but did not receive feedback during the housing element preparation period.



- Community Health Investment Department at St. Joseph Hospital whose mission includes ensuring that residents, particularly the most vulnerable and low-income families, have access to adequate and affordable housing.
- Planners for Health OC who work to address the needs of lower income residents, primarily through advocating for housing availability at all levels.

As part of the North Tustin Specific Plan focused outreach to underrepresented portions of the community, the City completed the following:

- In December 2021, staff conducted the first community workshop to introduce the initiation of the project and solicit input from the community. An online survey was conducted for this workshop. This first survey was made public on December 22nd and by February 12th had collected 762 responses.
- On March 4, 2021, staff conducted a second community workshop to solicit support for preferred environments and development within the plan area. A total of 91 persons attended this meeting and completed a survey.
- On July 20, 2021, staff conducted a third workshop to further involve the community in refining the vision of the project. Over 65 community members attended this in-person workshop and 58 survey responses were received by August 23, 2021.
- On June 16, 2022, staff conducted a scoping meeting kicking off the project EIR. The scoping session turned into a question and answer session to a full Council chambers.
- For each of the workshops, mailers and notices went out to over 4,000 property owners and businesses within the plan area and extending 300 feet beyond. The workshops were also advertised on the City's website and on social media.
- City Staff also conducted 11 one-on-one meetings with major land developers, property owners, and major business interests.

### **How Public Comments Were Considered and Incorporated**

Appendix C contains either summaries or direct comments received by the City from the initial stages of development for the housing element update to the public review draft. Public input on the process at all stages was important to producing a plan for the City which met the local community needs and addressed State housing requirements. At each of the milestones below, the City provided opportunity for community input and then subsequently received, considered, and incorporated (if applicable) all public comments.

- Initial Document Development, including public workshop, community survey, and direct outreach to local stakeholders.
- Public Review Draft Release, including notification of interested parties and local organizations.
- HCD Review Draft Release, including notification of interested parties and local organizations.
- Planning Commission and City Council Consideration and Adoption, including options for required public comment and notification through posting of staff reports through all of the City's typical



posting methods. Hearings are televised and virtual participation is an option for those unable to attend.

Through the community survey, the City learned that participants recommended prioritization of:

Housing in close proximity to transit and in mixed-use or infill areas	The City prioritized future housing development within the Urban Mixed Use zoned areas as it provides the greatest flexibility for both higher density housing and mixed-use housing opportunities. These are also along major corridors within the City with the highest levels of access to public transit and in close proximity to local highways/freeways for regional access to jobs.
Accessory dwelling units	The City included ADUs as part of the candidate housing sites strategy and included a program which commits the City to updating the Municipal Code to permit ADUs and JADUs in all zones which allow residential uses and update Section 17.13.030 Permitted Uses table to clarify where ADUs and JADUs are permitted in compliance with State law. The City is also developing informational materials and train staff to work with residents on permitting and building ADUs.
Inclusionary Housing	The City considered inclusionary housing policies and made the determination not to develop them at this time.
Keeping existing affordable housing units	This City conducted a review of at-risk units (Table 3-38) and determined that only one development is at risk of converting to market rate. Housing Policy Action 1A commits to working with existing property owners and operators to maintain affordable units.
Property maintenance of older housing stock	The City committed to Housing Policy Action 3E to conduct annual assessments of housing stock potentially in need of rehabilitation. The City will consider promoting funding opportunities and community outreach/education on available resources.
Streamline development processes	The City has identified candidate housing sites which are priority for future housing development of affordable housing. Housing Policy Action 2E also addresses review of the City's development processes for methods to provide regulatory relief, including potentially creating additional efficiencies in some processes.
Lack of informational resources	The City already has information materials available relating to ADUs, various development processes, and other housing-related resources available to residents either through the City or through other organizations/agencies. Through several policy actions, the City will continue to develop informational materials and resources as they are needed and make those available in multiple media formats and languages for accessibility.
Access to funding	The City continues to pursue funding sources through various local, regional, and state grants. Several policy actions within the housing element address pursuing funding available to address housing availability and fair housing issues.



# Virtual Workshop Presentation

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This section contains all Virtual Workshop Presentation materials and handouts. The recorded presentation is available on the City's Housing Element Update webpage at:

<https://www.cityoforange.org/290/Current-Projects>

The City of Orange is in the process of updating the 2021-2029 Housing Element. This Fact Sheet provides information about the Housing Element and the City’s update process.

## What is a Housing Element?

The Housing Element is a chapter of the City’s General Plan. It is a policy document initiated by the City that identifies policies and programs to meet existing and projected future housing needs for all economic segments of Orange residents. The 2021-2029 Housing Element identifies specific actions to address local housing needs.

### Key Features of the 2021-2029 Housing Element:

- Population and housing characteristics of Orange
- Evaluation of housing constraints and resources
- Evaluation of existing housing programs and policies
- Identification of sites to accommodate housing at all income levels
- Policies, programs & quantified objectives

### What is the Regional Housing Needs Assessment (RHNA)?

The RHNA process is required by State law to quantify projected future housing need at various income levels within a community. The RHNA process informs the City of Orange planning processes by identifying future housing need resulting from projected growth in population, employment and households. For the 2021-2029 planning period, the City of Orange is allocated a number of housing units to accommodate this growth by income category. The Housing Element must identify sites *that have the potential* to accommodate projected future growth.



### 2021 - 2029 City of Orange Draft RHNA Housing Needs Allocation

Income Category	% of Median Family Income	Income Range <sup>1</sup>		RHNA Allocation (Housing Units)
		Min.	Max.	
Very Low Income	0 – 50% MFI	--	\$51,500	1,064 units
Low Income	51 – 80% MFI	\$51,501	\$82,400	603 units
Moderate Income	81 – 120% MFI	\$82,401	\$123,600	676 units
Above Moderate Income	> 120% MFI	\$123,601	>\$123,601	1,585 units
<b>Total:</b>				<b>3,927 units</b>

Notes: <sup>1</sup> Income range is based on the 2020 HUD Median Family Income (MFI) for Orange County of \$103,000.

## Why is the City Updating the Housing Element?

The City of Orange is required by State law to update its Housing Element every eight years. The current adopted Housing Element covers the 2013-2021 planning period. The City is now planning for the 2021-2029 planning period.

### *Importance of Updating the Housing Element:*

- Allows the City to plan for the housing needs of the community
- Demonstrates the ability to meet future housing growth needs
- Allows the community to participate in the planning process
- Allows the City to be eligible for some State grants and funding sources
- Ensures the City complies with State housing law

### *What is Included in the Update Process?*

The update process includes a variety of analyses, as well as multiple activities and opportunities for the Orange community to be involved.

Key features include:

- Opportunities, both virtually and in-person, for community participation
- Comprehensive review of demographics in the community
- Identification of housing sites to meet the City's projected housing need
- Hearings before the Planning Commission and City Council

### *How Can You Participate in the Update Process?*

An online Community Survey will be available on the City's website that will allow residents to provide the City with comments, preferences, and additional feedback. The City anticipates hosting a virtual workshop in Summer 2020 and Community Workshop in Spring of 2021 to provide the public with an additional opportunity for input prior to the completion of the Housing Element update. There will also be Planning Commission and City Council hearings which will be open to the public in 2021.

Please visit the Housing Element Update page on the City's website  
(<https://www.cityoforange.org/1956/Housing-Element-Update>)  
for the most up-to-date information.



#### **Schedule:**

- **Community Survey** – Summer 2020
- **Stakeholder Study Session** – Fall 2020
- **City Council Briefing Sessions** – Winter 2021
- **Public Review Draft** – Spring 2021
- **Community Workshop** - Late Spring 2021
- **Planning Commission Hearing** – Summer 2021
- **City Council Hearing** – Late Summer 2021

#### **For information, contact:**

Ms. Ashley Brodtkin, Associate Planner, City of Orange  
Email [abrodtkin@cityoforange.org](mailto:abrodtkin@cityoforange.org) or at call directly at (714) 744-7238

La Ciudad de Orange está en proceso de actualizar en Elemento Vivienda 2021-2029. Esta hoja informativa proporciona información sobre el Elemento Vivienda y el proceso de actualización de la ciudad.

### ¿Qué es un Elemento Vivienda?

El Elemento Vivienda es un capítulo del Plan General de la Ciudad. Es un documento de procedimientos iniciado por la ciudad que identifica los métodos y los programas para lograr cumplir con las necesidades de vivienda existentes y proyectadas para el futuro para todos los segmentos económicos de los residentes de Orange. El Elemento Vivienda 2021-2029 identifica acciones específicas para afrontar las necesidades de vivienda locales.

### Características Clave del Elemento Vivienda 2021-2029:

- Características de población y vivienda de Orange
- Evaluación de las limitaciones y los recursos de la vivienda
- Evaluación de los programas y procedimientos de vivienda existentes
- Identificación de sitios para proporcionar vivienda a todos los niveles de ingreso
- Procedimientos, programas y objetivos cuantificados

### ¿Qué es la Evaluación de las Necesidades de Vivienda Regionales (Regional Housing Needs Assessment -RHNA)?:

La ley estatal requiere que el proceso (RHNA) cuantifique la necesidad de vivienda proyectada a un futuro en varios niveles de ingresos dentro de una comunidad. El proceso (RHNA) proporciona información acerca de los procesos de planificación de la Ciudad de Orange al identificar la necesidad de vivienda futura como resultado del crecimiento proyectado de población, empleo y hogares. Para el periodo de planificación 2021-2029, a la Ciudad de Orange se le asigna una cantidad de unidades de vivienda para adaptarse a este crecimiento por categoría de ingresos. El Elemento Vivienda debe identificar los sitios que tienen el potencial para adaptarse al futuro crecimiento proyectado.



### Borrador de la Distribución de Necesidades de Vivienda (RHNA) de la Ciudad de Orange 2021 – 2029

Categoría de Ingresos	% de Ingreso Familiar Rango Medio	Escala de Ingresos <sup>1</sup>		Distribución del RHNA (Unidades Habitacionales)
		Min.	Max.	
Ingresos muy bajos	0 – 50%(IFP)	--	\$51,500	1,064 unidades
Ingresos bajos	51 – 80%(IFP)	\$51,501	\$82,400	603 unidades
Ingresos moderados	81 – 120%(IFP)	\$82,401	\$123,600	676 unidades
Ingresos por encima de Ingresos Moderados	> 120%(IFP)	\$123,601	>\$123,601	1,584 unidades
<b>Total:</b>				<b>3,927 unidades</b>

1. El rango de ingresos se basa en el Ingreso Familiar Promedio (IFP)=(Median Family Income: MFI) para el Condado de Orange de \$103,000

## ¿Por qué la Ciudad está Actualizando el Elemento Vivienda?

La ley estatal requiere que la Ciudad de Orange actualice su Elemento Vivienda cada ocho años. El Elemento Vivienda adoptado actualmente cubre el periodo de planificación 2013-2021. La Ciudad está preparando ahora el periodo de planificación 2021-2029.

### *La importancia de Actualizar el Elemento Vivienda:*

- Permite a la Ciudad planificar las necesidades de vivienda de la comunidad
- Demuestra la capacidad para satisfacer las necesidades futuras de crecimiento de vivienda
- Permite que la comunidad participe en el proceso de planificación
- Permite que la Ciudad sea elegible para recibir algunas subvenciones y fondos estatales
- Garantiza que la Ciudad cumpla con la ley estatal de vivienda

### *¿Qué se incluye en el Proceso de Actualización?*

El proceso de actualización incluye una variedad de análisis, así como múltiples actividades y oportunidades para que la comunidad de Orange participe.

Las características clave incluyen:

- Oportunidades, tanto virtuales como en persona, para la participación de la comunidad
- Una revisión integral de la demografía en la comunidad
- La identificación de sitios de vivienda para satisfacer la necesidad de vivienda proyectada de la Ciudad
- Audiencias ante la Comisión de Planificación y el Ayuntamiento de la Ciudad

### *¿Cómo puede usted participar en el Proceso de Actualización?*

Una Encuesta Comunitaria en línea estará disponible en el sitio web de la Ciudad que permitirá a los residentes proporcionar a la Ciudad sus comentarios, preferencias y sugerencias adicionales. La Ciudad anticipa organizar un taller virtual en el verano del 2020 y un Taller Comunitario en la primavera del 2021 para darle al público una oportunidad adicional de proporcionar sus comentarios antes de completar la actualización del Elemento Vivienda. También habrá audiencias de la Comisión de Planificación y el Ayuntamiento de la Ciudad que estarán abiertas al público en el 2021

Por favor visite la página de Actualización del Elemento Vivienda en el sitio web de la Ciudad

(<https://www.cityoforange.org/1956/Housing-Element-Update>)

para obtener la información más reciente.



#### **Schedule:**

- Encuesta Comunitaria – Otoño 2020
- Sesión de Estudio de Partes Interesadas – Otoño 2020
- Sesiones Informativas del Ayuntamiento - Invierno 2021
- Borrador de la Revisión Pública – Primavera 2021
- Taller Comunitario – Finales de la Primavera 2021
- Audiencia de la Comisión de Planificación – Verano 2021
- Audiencia del Consejo Municipal – Finales del verano 2021

#### **Para obtener información, comuníquese con:**

Sra. Ashley Brodtkin, Planificadora Asociada, Ciudad de Orange

Correo electrónico [abrodtkin@cityoforange.org](mailto:abrodtkin@cityoforange.org) o llamando directamente al (714) 744-7238

**City of Orange**  
**2021-2029**  
**Housing Element**  
**Update**  
 Community Workshop #1

[www.cityoforange.org/1956/Housing-Element-Update](http://www.cityoforange.org/1956/Housing-Element-Update)




1

2021-2029 Housing Element Update

### Agenda

- I. Overview of Orange
- II. Overview of Housing Element
- III. Regional Housing Needs Assessment (RHNA)
- IV. Update Process and Outreach
- V. Project Schedule
- VI. Next Steps



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## Overview of Orange




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2021-2029 Housing Element Update

### The Orange Community

**Population in Orange, 2000 – 2040**

Year	Population
Actual 2000	128,823
Actual 2010	136,416
Projected 2012	138,300
Projected 2020	143,300
Projected 2035	154,400
Projected 2040	155,000

**Population in Orange by Race or Ethnicity**

Race or Ethnicity	Percentage
White	70%
Hispanic/Latino	20%
Asian	3.2%
Black	1%
American Indian and Alaska Native	0%
Native Hawaiian or Other Pacific Islander	0%
Some Other Race	3%
Two or More Races	3%

Source: American Community Survey, 5-Year Estimates 2017



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2021-2029 Housing Element Update

### The Orange Community

**Household by Type in Orange**

Household Type	Percentage
Married-couple Family Households	49%
Householder Age 65 or Above	3%
Male Householder, No Spouse	5%
Female Householder, No Spouse Present	11%
Non-Family Household	22%
Owner	32%
Renter	43%

Source: American Community Survey, 5-Year Estimates 2017



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2021-2029 Housing Element Update

### Housing in Orange

**Housing by Type in Orange**

Housing Type	Percentage
Single-Family Detached	54%
Single-Family Attached	9%
Multi-Family	31%
Mobile Homes	6%

**Housing by Year Built**

Year Built	Percentage
2020 or later	0.1%
2015 to 2019	0.8%
2010 to 2014	2.2%
2005 to 2009	7.3%
2000 to 2004	9.8%
1995 to 1999	12.2%
1990 to 1994	23.2%
1985 to 1989	24.7%
1980 to 1984	14.5%
1975 to 1979	1.6%
1970 to 1974	5.5%
1965 to 1969	0.1%
1960 to 1964	0.8%
1955 to 1959	0.8%
1950 to 1954	7.3%
1945 to 1949	12.2%
1940 to 1944	23.2%
1935 to 1939	24.7%
1930 to 1934	14.5%
1925 to 1929	1.6%
1920 to 1924	5.5%
1915 to 1919	0.1%
1910 to 1914	0.8%
1905 to 1909	0.8%
1900 to 1904	7.3%
1895 to 1899	12.2%
1890 to 1894	23.2%
1885 to 1889	24.7%
1880 to 1884	14.5%
1875 to 1879	1.6%
1870 to 1874	5.5%
1865 to 1869	0.1%
1860 to 1864	0.8%
1855 to 1859	0.8%
1850 to 1854	7.3%
1845 to 1849	12.2%
1840 to 1844	23.2%
1835 to 1839	24.7%
1830 to 1834	14.5%
1825 to 1829	1.6%
1820 to 1824	5.5%
1815 to 1819	0.1%
1810 to 1814	0.8%
1805 to 1809	0.8%
1800 to 1804	7.3%
1795 to 1799	12.2%
1790 to 1794	23.2%
1785 to 1789	24.7%
1780 to 1784	14.5%
1775 to 1779	1.6%
1770 to 1774	5.5%
1765 to 1769	0.1%
1760 to 1764	0.8%
1755 to 1759	0.8%
1750 to 1754	7.3%
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1690 to 1694	23.2%
1685 to 1689	24.7%
1680 to 1684	14.5%
1675 to 1679	1.6%
1670 to 1674	5.5%
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1630 to 1634	14.5%
1625 to 1629	1.6%
1620 to 1624	5.5%
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1610 to 1614	0.8%
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1425 to 1429	1.6%
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1415 to 1419	0.1%
1410 to 1414	0.8%
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1220 to 1224	5.5%
1215 to 1219	0.1%
1210 to 1214	0.8%
1205 to 1209	0.8%
1200 to 1204	7.3%
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1190 to 1194	23.2%
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1180 to 1184	14.5%
1175 to 1179	1.6%
1170 to 1174	5.5%
1165 to 1169	0.1%
1160 to 1164	0.8%
1155 to 1159	0.8%
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1120 to 1124	5.5%
1115 to 1119	0.1%
1110 to 1114	0.8%
1105 to 1109	0.8%
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1830 to 1834	14.5%
1825 to 1829	1.6%
1820 to 1824	5.5%
1815 to 1819	0.1%
1810 to 1814	0.8%
1805 to 1809	0.8%
1800 to 1804	7.3%
1795 to 1799	12.2%
1790 to 1794	23.2%
1785 to 1789	24.7%
1780 to 1784	14.5%
1775 to 1779	1.6%
1770 to 1774	5.5%
1765 to 1769	0.1%
1760 to 1764	0.8%
1755 to 1759	0.8%
1750 to 1754	7.3%
1745 to 1749	12.2%
1740 to 1744	23.2%
1735 to 1739	24.7%
1730 to 1734	14.5%
1725 to 1729	1.6%
1720 to 1724	5.5%
1715 to 1719	0.1%
1710 to 1714	0.8%
1705 to 1709	0.8%
1700 to 1704	7.3%
1695 to 1699	12.2%
1690 to 1694	23.2%
1685 to 1689	24.7%
1680 to 1684	14.5%
1675 to 1679	1.6%
1670 to 1674	5.5%
1665 to 1669	0.1%
1660 to 1664	0.8%
1655 to 1659	0.8%
1650 to 1654	7.3%
1645 to 1649	12.2%
1640 to 1644	23.2%
1635 to 1639	24.7%
1630 to 1634	14.5%
1625 to 1629	1.6%
1620 to 1624	5.5%
1615 to 1619	0.1%
1610 to 1614	0.8%
1605 to 1609	0.8%
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1595 to 1599	12.2%
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1425 to 1429	1.6%
1420 to 1424	5.5%
1415 to 1419	0.1%
1410 to 1414	0.8%



7

2021-2029 Housing Element Update

### What is a Housing Element

- Required Section of the Orange General Plan
- Provides Goals, Policies, Programs, and Objectives to guide future housing growth to meet the needs of residents of all income levels in Orange
- Identifies projected housing needs by income category
- Requires certification by the State Department of Housing and Community Development (HCD) for compliance with State housing laws

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2021-2029 Housing Element Update

### Why are Housing Elements Updated?

- Plan for the housing needs of all segments of the Community
- Demonstrates Orange's ability to meet the future housing growth needs
- Allows the community to further engage in the planning process
- Ensures the City complies with State housing laws
- Allows the City to become eligible for State grants and funding sources



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2021-2029 Housing Element Update

### A "Certified" Housing Element

#### What Does it Mean to Have a "Certified" Housing Element?

- Demonstrates substantial compliance with State law
- Certified by the Department of Housing and Community Development (HCD)

#### Benefits of Certification

- Eligibility for State assistance programs
- Demonstrates ability to meet future growth and un-met needs
- Eligibility for State grants and alternative funding sources

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2021-2029 Housing Element Update

### Housing Element Features

Population and housing profile	Evaluation of existing programs and policies	Evaluation of housing constraints and resources	Analysis of sites to accommodate the City's RHNA Allocation	Policies, programs and quantified objectives to achieve the City's housing goals

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2021-2029 Housing Element Update

## What is RHNA?

- Regional Housing Needs Assessment
- Quantifies the need for housing within each City/County in California
- Based on future growth in population, employment and households

**Department of Housing and Community Development**  
HCD determines and distributes the State's housing need to all the regional councils of government

**Southern California Association of Governments**  
SCAG develops methodology to determine "fair share" distribution of the region's housing need to local jurisdictions

**City of Orange RHNA 2021-2029**  
3,927 units

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2021-2029 Housing Element Update

## RHNA Draft Allocation: 2021 – 2029 Planning Period

Income Category	% of Area Median Income (AMI)	Income Range*		RHNA Allocation (Housing Units)**
		Min.	Max.	
Very Low Income	0 - 50% AMI	--	\$51,500	1,064 units
Low Income	51 – 80% AMI	\$51,501	\$82,400	603 units
Moderate Income	81 – 120% AMI	\$82,401	\$123,600	676 units
Above Moderate Income	>120% AMI	\$123,601	>\$123,601	1,585 units
<b>Total:</b>				<b>3,927 units</b>

\*Income range is based on the 2020 HUD Median Family Income (MFI) for Orange County of \$103,000.  
\*\*RHNA Allocation is in draft form and subject to change pending final approval by SCAG.

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## Update Process and Outreach

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2021-2029 Housing Element Update

## What is Included in the Update Process?

- Community Outreach Process (Workshops and Online Survey)
- Update of the City's demographic conditions
- Review and Analysis of sites to meet the City's RHNA housing growth need
- Creation of policies and programs for existing and future housing needs
- Public Hearings before Planning Commission and City Council

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## Next Steps

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2021-2029 Housing Element Update

## Housing Element Update Schedule

**Community Survey – Summer 2020**

**Stakeholder Study Session – Fall 2020**

**City Council Briefing Sessions – Winter 2021**

**Public Review Draft – Spring 2021**

**Community Workshop – Late Spring 2021**

**Planning Commission Public Hearing – Summer 2021**

**City Council Public Hearing – Late Summer 2021**

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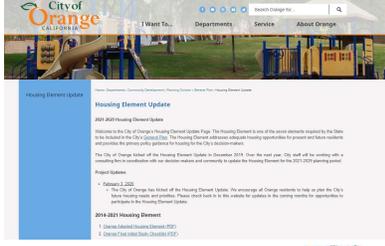
2021-2029 Housing Element Update

## We Want Your Input

**Participate in the Housing Element Survey!**

Go to:  
[www.cityoforange.org/1956/Housing-Element-Update](http://www.cityoforange.org/1956/Housing-Element-Update)

Click the link titled **"Housing Element Survey"** to begin.



The screenshot shows the City of Orange website with a navigation bar and a main content area titled "Housing Element Update". The page includes a "2021-2029 Housing Element Update" section with a "Begin Survey" button.



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2021-2029 Housing Element Update

## How to Use the Survey

1. Click the link provided on the City's website using either your phone or a desktop/laptop
2. Click **"Begin"** to start the survey
3. Carefully read the instructions on each slide
4. Respond to the provided prompts with your ideas and input
5. Complete slide five and click **"Submit Final Questions"** to complete the survey and submit all responses

The survey provides the City with important community feedback to help shape goals and policies within the Housing Element. Your input is very important!



The screenshot shows a mobile survey interface with a "Begin" button and a "Submit Final Questions" button. The interface includes a progress bar and a list of survey topics: STRATEGY FINING, AFFORDABLE HOUSING, and BUDGET ALLOCATION.



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2021-2029 Housing Element Update

## Thank you!

### Questions?

Contact **Ashley Brodtkin**, Associate Planner  
 Phone: 714-744-7238  
 Email: [abrodtkin@cityoforange.org](mailto:abrodtkin@cityoforange.org)

City Housing Element webpage:  
[www.cityoforange.org/1956/Housing-Element-Update](http://www.cityoforange.org/1956/Housing-Element-Update)



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# Community Workshop

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This section contains all workshop materials and handouts, flyers, and all available public comments provided verbally and in the chat during the workshop. A video recording of the workshop is available on the City's Housing Element Update webpage at:

<https://www.cityoforange.org/2226/2021-2029-Housing-Element-Update>



# City of Orange

## 2021-2029 Housing Element Update Community Workshop #2

The City of Orange is preparing to release the Public Review Draft of the 2021-2029 Housing Element. Please join us for a virtual workshop to learn about the different parts of the draft document as well as how you can provide feedback during the public review period.

The City's General Plan establishes a long-term vision for growth and change in the community. The Housing Element is a required component of the General Plan and guides future decisions regarding housing, goals, policies, and programs. It is required to be updated every 8 years by the State Department of Housing and Community Development (HCD). This update is the 6th Cycle Housing Element update and will plan for the period from 2021-2029.

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**WHEN:** May 26, 2021, 6-8 p.m.

**WHERE:** Online Meeting Via Zoom, The link is located on the City's Website under Current Projects:

[www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)

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*For questions, please contact Anna Pehoushek, Assistant Community Development Director by email at [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org)*





# Ciudad de Orange

## Actualización del Elemento de Vivienda 2021-2029 Taller Comunitario #2

La ciudad de Orange se está preparando para publicar el Borrador de Revisión Pública del Elemento de Vivienda 2021-2029. Únase a nosotros en un taller virtual para aprender sobre las diferentes partes del borrador del documento y cómo puede proporcionar comentarios durante el período de **revisión pública**.

El Plan General de la Ciudad establece una visión a largo plazo para el crecimiento y el cambio en la comunidad. El Elemento de Vivienda es un componente obligatorio del Plan General y sirve como guía para las decisiones futuras con respecto a la vivienda, las metas, las políticas y los programas. El Departamento de Vivienda y Desarrollo Comunitario del Estado (HCD) debe actualizarlo cada 8 años. Esta actualización es la actualización del elemento de vivienda del 6o Ciclo y planificará para el período 2021-2029.

---

**FECHA Y HORA:** 26 de mayo del 2021, 6-8 p.m.

**LUGAR:** Reunión en línea a través de Zoom, el enlace se encuentra en el sitio web de la ciudad en **Proyectos Actuales:**

[www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)

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*Si tiene alguna pregunta, por favor comuníquese con Anna Pehoushek, Subdirectora de Desarrollo Comunitario, por correo electrónico a [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org)*





## Community Workshop #2

The City of Orange held a second public community workshop for the 2021-2029 6<sup>th</sup> Cycle Housing Element Update on Wednesday May 26, from 6-7:30 PM. The purpose of the meeting was to provide information on the release of the City's Public Review Draft of the Housing Element, which was made available on the City's website for community review for 30 days. This workshop included a presentation which discussed the following topics:

- The City's efforts to date on the project
- A brief review of the Housing Element update process, with the full detailed first workshop available on the City's website.
- A walkthrough of the different sections and how to read and understand the Housing Element document
- A discussion of the City's sites analysis approach to identifying housing opportunity
- The ways in which workshop participants and community members could provide comments, including live during the workshop, by email directly to City staff, or through a community survey designed specifically to make it easy to provide feedback on each section.
- Next steps in the update process

Following the presentation, the City allowed time for open questions from the public regarding the Public Review Draft of the City's Housing Element. A video of the full presentation in English and Spanish are available on the City's Housing Element Update webpage here,

<https://www.cityoforange.org/2226/2021-2029-Housing-Element-Update>

Spanish translation services were provided for the workshop, though no participants chose to use that option. The City recorded the Spanish presentation anyway and provided it to the community.

## Text Comments Received

In addition to verbal comments, the City also received some comments using the "chat" function in zoom. Those questions/comments are provided word for word below:

- When is the last day to provide feedback?
- Does the lack of an Inclusionary Housing Ordinance preclude an applicant from invoking state density bonus on a particular project?
- Will there be another meeting before sending the draft to HCD?
- Thank you for presenting this workshop and responding to questions!

Staff was available to provide direct responses in the chat during the meeting and was able to respond to all questions.

## Community Response Survey

Additionally, the City launched an online community survey on May 26, 2021. The survey was the second survey created and distributed to gather feedback on the Housing Element and focused on obtaining feedback on the Draft Housing Element document. Direct responses to the survey are provided in Appendix C under "Public Comments".

**City of Orange**  
Community Workshop #2 Summary  
May 26, 2021



The survey was available on the City's Housing Element Update webpage. The City promoted the survey at the workshop and through social media, email and community announcements. The survey was live through the end of the public review period.

18:41:24 From Maria Zacarias Torres : when is the last day to provide feedback?  
18:43:47 From Molly Mendoza : Link to Public Review Draft:  
[https://www.cityoforange.org/DocumentCenter/View/12889/Housing-Element-Public-Review-Draft\\_May-2021](https://www.cityoforange.org/DocumentCenter/View/12889/Housing-Element-Public-Review-Draft_May-2021)  
18:55:04 From Byron de Arakal : Does the lack of an Inclusionary Housing Ordinance preclude an applicant from invoking state density bonus on a particular project?  
18:56:15 From Maria Zacarias Torres : will there be another meeting before sending the draft to HCD?  
18:56:23 From Byron de Arakal : \*preclude\*  
18:58:44 From Molly Mendoza : Hi Maria, the City will not host an additional meeting, however you can comment on the draft document and share your ideas by sending your comments to the City. Thanks for participating!  
19:17:20 From Molly Mendoza : Link to Public Review Draft:  
[https://www.cityoforange.org/DocumentCenter/View/12889/Housing-Element-Public-Review-Draft\\_May-2021](https://www.cityoforange.org/DocumentCenter/View/12889/Housing-Element-Public-Review-Draft_May-2021)  
19:18:34 From soraya to Ines Galmiche(Direct Message) : Thank you Ines. Great job.  
19:22:01 From Maria Zacarias Torres : yes, that would be very helpful!  
19:22:09 From Bonnie Robinson : Thank you for presenting this workshop and responding to questions!

# Orange - Housing Element Update Workshop #2

Housing Element Draft - what income categories will you accommodate? In the Housing Element?

It would be nice to take the draft and break it up by sections - PDF each section.

Homelessness - 2-26: A list of factors contributing to the rise in homeless - does not mention that

Economic constraints - home on the market experienced a 9% year to year increase. Only says "homes" - can

Are there any creative strategies for developing housing specifically at the low and very low income category

There were 1438 participants - but about 3,000 data points for the survey - what is the difference between a

The sites for Low and Very are on sites that meet default density or greater? zoning identified is UMU - what are other

Overcrowding - There is a lot of overcrowding in the City. How will the Housing Element address overcrowding in

Different income levels - what is the difference between income levels - what is low/very low, moderate income

If we want to get affordable housing on these sites we need to have a specific program to ensure affordable

Previous 5th cycle - listed major employers, but did not list the incomes of the people working in these institutions.

What is the timeline of the draft document? who does it go to first? Does it go to HCD then Planning

The City should look at land use as a tool to increase housing development in the City - specifically

Inclusionary - town and country - multiple units. When asked planning commission whether any

Does the plan identify for sale vs rental housing? What does that look like for the people looking to get into the home

Does the lack of an Inclusionary Housing Ordinance preclude an applicant from invoking state density bonus on a

If we are doing development of 50 units to the acre - there is no need for the developer to apply for density - we

Second Goal - to accommodate the City of Orange's RHNA of all incomes - not meeting the current RHNA

^Cont. How will the City meet the low and very low income allocation - What are the strategies?

**City of Orange**  
**2021-2029**  
**Housing Element**  
**Update**  
**Community Workshop #2**  
**Taller Comunitario #2**  
[www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)




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2021-2029 Housing Element Update

### Agenda

I. Housing Element Efforts to Date	I. Sala de Reunión en Español
II. Housing Element Update Process	II. Esfuerzos del Elemento de Vivienda hasta la Fecha
III. Public Review Draft – Sites and Policies	III. Proceso de Actualización del Elemento de Vivienda
IV. Community Review/Feedback	IV. Borrador de Revisión Pública – Sitios y Políticas
V. Next Steps	V. Revisión/Comentarios de la Comunidad
	VI. Próximos Pasos



2

**Spanish Breakout Room**



3

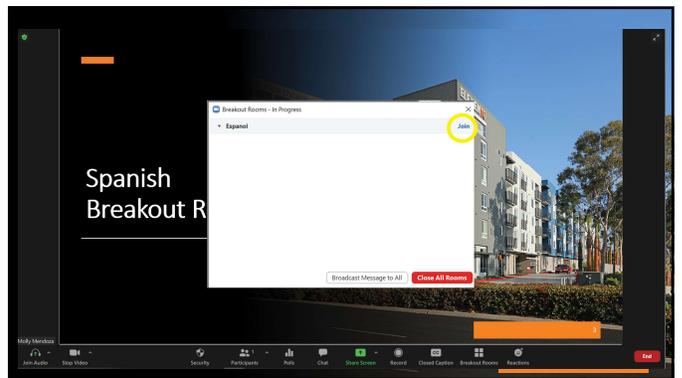
**Spanish Breakout Room**

Breakout Rooms - In Progress

Expand

Broadcast Message to All

Close All Rooms



4

**Spanish Breakout Room**

Join a breakout room



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**Housing Element Efforts to Date**



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2021-2029 Housing Element Update

## Overview of Orange's Housing Element Update

- City began the Housing Element Update process in late 2019
- Community Workshop #1 (Summer 2020)
- Community Survey (Summer 2020)
- Stakeholder Meetings (Winter 2020)
- Public Review Draft Release: May 21, 2021

• Project website with the available Public Review Draft: [www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)



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2021-2029 Housing Element Update

## Workshop #1

- The City held a virtual recorded workshop for the Housing Element Update
- Overview of the Housing Element Update process, Regional Housing Needs Assessment (RHNA), project timeline
- A recording of Workshop #1 (posted to YouTube) and Fact Sheet #1 (English and Spanish) are available on the City's Website: [www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)




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2021-2029 Housing Element Update

## Community Housing Survey

- Survey focused on:
  - Housing Opportunity Programs
  - Potential Housing Locations
  - Removing Potential Constraints
- Available for approximately two months in English and Spanish
- 148 participants, 3,433 data points, and 256 comments




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2021-2029 Housing Element Update

## Stakeholder Meetings

- Two stakeholder meetings held in December 2020
  - Housing advocates and community groups
  - Affordable and market-rate housing developers
- Summary of feedback received:
  - Clarity on the process, requirements, and timing is important for housing projects
  - Informational housing materials should be made available to the public
  - Explore policies aimed at streamlining affordable housing
  - Community is leaving – can't afford to live in Orange
- Full Summary of stakeholder meeting notes found in Appendix C of the Public Review Draft Housing Element




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## Housing Element Update Process



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2021-2029 Housing Element Update

## What is a Housing Element

- Required Section of the Orange General Plan
- Provides Goals, Policies, Programs, and Objectives to guide future housing growth to meet the needs of residents of all income levels in Orange
- Identifies projected housing needs by income category
- Requires certification by the State Department of Housing and Community Development (HCD) for compliance with State housing laws



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2021-2029 Housing Element Update

## Housing Element Features

- Population and housing profile
- Evaluation of existing programs and policies
- Evaluation of housing constraints and resources
- Analysis of sites to accommodate the City's RHNA Allocation
- Policies, programs and quantified objectives to achieve the City's housing goals

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2021-2029 Housing Element Update

## Public Review Draft – Sites and Policies

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2021-2029 Housing Element Update

## Sites Strategy

- The Public Review Draft Housing Element identifies candidate sites under existing zoning that can accommodate the City's 2021-2029 Regional Housing Needs Assessment (RHNA) need.
- The proposed candidate sites are focused in areas of the City with existing resources and transportation and include estimated projections of Accessory Dwelling Units (ADU).
- Much of the City's lower income need is planned to be accommodated in the Urban Mixed-Use (UMU) zone.

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2021-2029 Housing Element Update

## City of Orange 6th Cycle

Proposed Sites By Income Category

- Above Moderate
- Moderate
- Low/Very Low
- Low/Very Low & Above Moderate
- Low/Very Low & Moderate
- City Boundary

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2021-2029 Housing Element Update

## Urban Mixed-Use (UMU) Zone

- Intended to provide urban, high intensity, regionally-oriented activity centers with a mixture of housing, commercial, professional office and civic uses
- Permits residential either as part of a mixed-use project or as a freestanding use
- Permits development up to 60 dwelling units per acre (du/ac)
- HCD's default density for identifying affordable housing in Orange in 30 du/ac
- Places potential future housing close to services, jobs, and transportation

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2021-2029 Housing Element Update

## Assumption of Affordability

- Conservative assumption that projects will not develop at 60 du/ac, but rather 48 du/ac consistent with the City's Land Use Element
- This accommodates commercial, office, or other types of housing
- Assume that up to 25% of units on candidate sites may develop at the very-low and low affordability level. The rest are assumed to be market-rate.

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2021-2029 Housing Element Update

## Proposed Housing Policy Actions

- The Review of Past Performance showed that the City has been successful in implementing its 5<sup>th</sup> Cycle policy actions.
- Some proposed 6<sup>th</sup> Cycle housing policy actions are from the City's current Housing Element that are working well
- New policy actions have been added to accommodate new provisions in State law
- Additional policy actions have been added based on fair housing analysis





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2021-2029 Housing Element Update

## Proposed Housing Goals

- **Goal 1:** High quality neighborhoods and housing stock.
- **Goal 2:** Accommodate Orange's RHNA need at all income levels.
- **Goal 3:** Effective maintenance, preservation, improvement, and development of housing citywide.
- **Goal 4:** Equal housing opportunity for all persons regardless of race, religion, sex, marriage status, ancestry, national origin, or color.



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2021-2029 Housing Element Update

## Sample Housing Policy

**Housing Policy Action 2A: Annual Review of Housing Element**

*The City will continue to conduct an annual implementation review of the Housing Element consistent with HCD's annual reporting requirements. The review includes the following information: a log of new residential development permits and completion reports; inventory of units built in the Extremely Low-, Very Low- and Low-income categories; an update or inventory of approved projects; an annual estimate of population from the State Department of Finance; and available vacant land and zoning survey.*

**Timeframe:** Annually  
**Responsible Agency:** City of Orange Community Development Department  
**Funding Source:** General fund



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2021-2029 Housing Element Update

## Community Survey

- One method of providing comments to the project team is to complete the Public Review Draft Response Survey
- Please go to the following link (also on the City's website) to input comments in the survey: <https://forms.office.com/r/CE5KFqhtcr>





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2021-2029 Housing Element Update

## Email Comments/Questions to the Project Team

- If you would like to send attachments, letters, or free response comments to the Project Team, please email those directly to Anna Pehoushek at [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org)
- The City welcomes additional resources or materials related to the Housing Element. If you would like to send those, please email those directly as well.



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2021-2029 Housing Element Update

## Live Question & Answer

- The purpose of tonight's question and answer is to gather initial feedback and answer questions on how to read the City's Draft Housing Element
- Please use the **"Raise Hand"** function through Zoom and staff will call on you in order to unmute
- Questions can also be submitted to the Project Team through typing in the "chat" function
- Frequently Asked Questions (FAQ) on the Draft Housing Element available on the City's website: [www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)

City of Orange

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## Next Steps

City of Orange

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2021-2029 Housing Element Update

## Housing Element Update Schedule

Public Review Draft – Spring 2021

Community Workshop - Spring 2021

Planning Commission/City Council Briefings – Summer 2021

HCD Review Draft – Late Summer 2021

City of Orange

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2021-2029 Housing Element Update

## Thank you!

### Questions?

Contact **Anna Pehoushek**, Assistant Community Development Director  
 Email: [apehoushek@cityoforange.org](mailto:apehoushek@cityoforange.org)

City Housing Element webpage:  
[www.cityoforange.org/housingelement](http://www.cityoforange.org/housingelement)

City of Orange

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# Online Community Survey

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This section contains an outline of the community survey and a summary of the survey results. The online community survey received 148 responses from the public.



## Community Survey

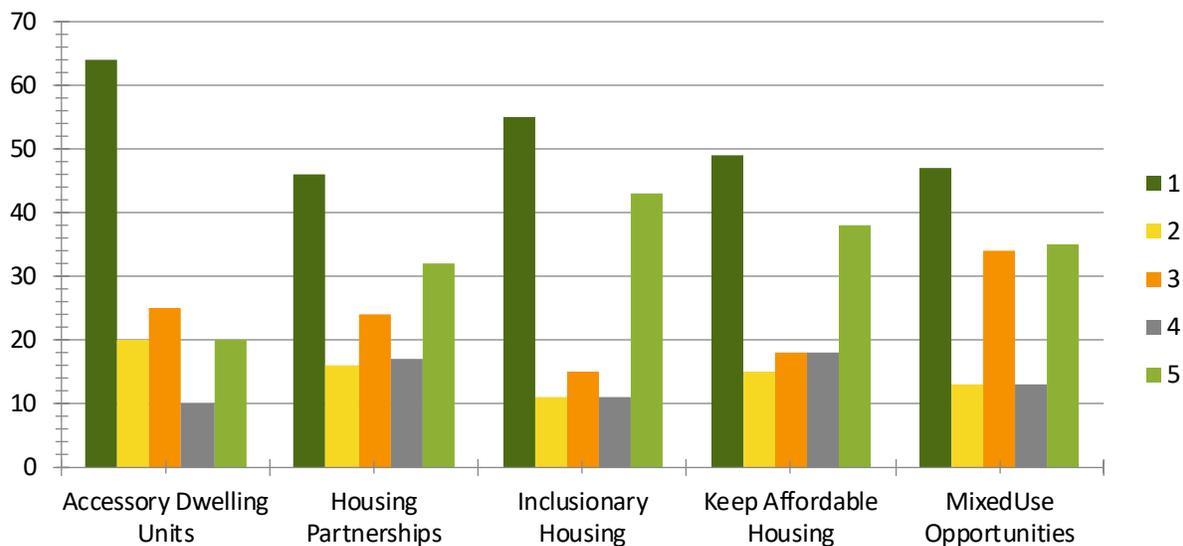
October 12, 2020 to November 30, 2020 the City of Orange launched an online community survey in order to gather feedback regarding potential policies and programs to include in the Housing Element, as well as potential housing types and opportunities for housing in the City. The survey also solicited feedback regarding potential barriers to housing access and constraints to the development of housing. Below is a summary of the survey’s results.

### Slide 1: Housing Program Opportunities

Participants were provided a variety of housing programs opportunities, categorized into four groups: Affordable Housing programs, Community Assistance programs, Fair Housing programs, and Streamlining Development Processes. Participants were asked to rank each potential program or policy based on applicability, as well as what they would most like to see implemented. The scale was set from one to five, one being the least appealing and five being the most appealing.

**Affordable Housing Programs - Figure C-1** displays data results for participant interest in a variety of affordable housing programs. Overall, participants showed little interest in affordable housing programs provided by the survey, as all programs had a majority rating of one star. However, based on the five-star data, participants were most interested in programs to create inclusionary housing, while programs and policies to incentivizing accessory and second dwelling units were identified as the least appealing. Participants also showed the highest interest in keeping existing affordable housing.

**Figure C-1: Affordable Housing Program Opportunities**

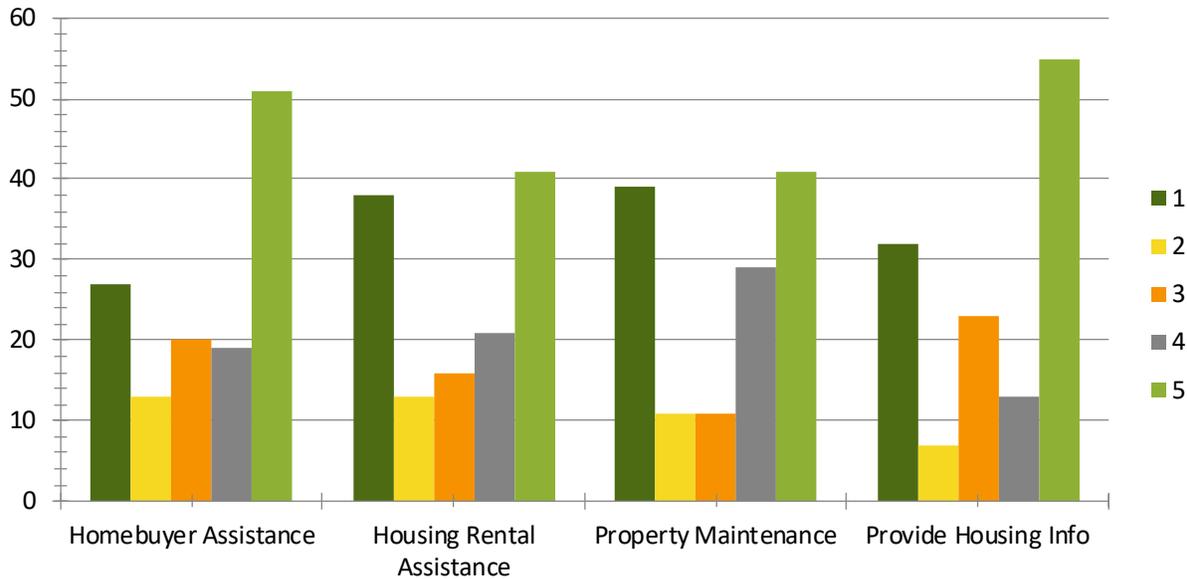


**Community Assistance Programs – Figure C-2** displays survey results for participant interest in different community assistance programs. Overall, participants showed a high interest in all the potential community assistance programs. The figure shows that participants were most interested in the City providing housing information, participants also identified assistance funding for first-time homebuyers



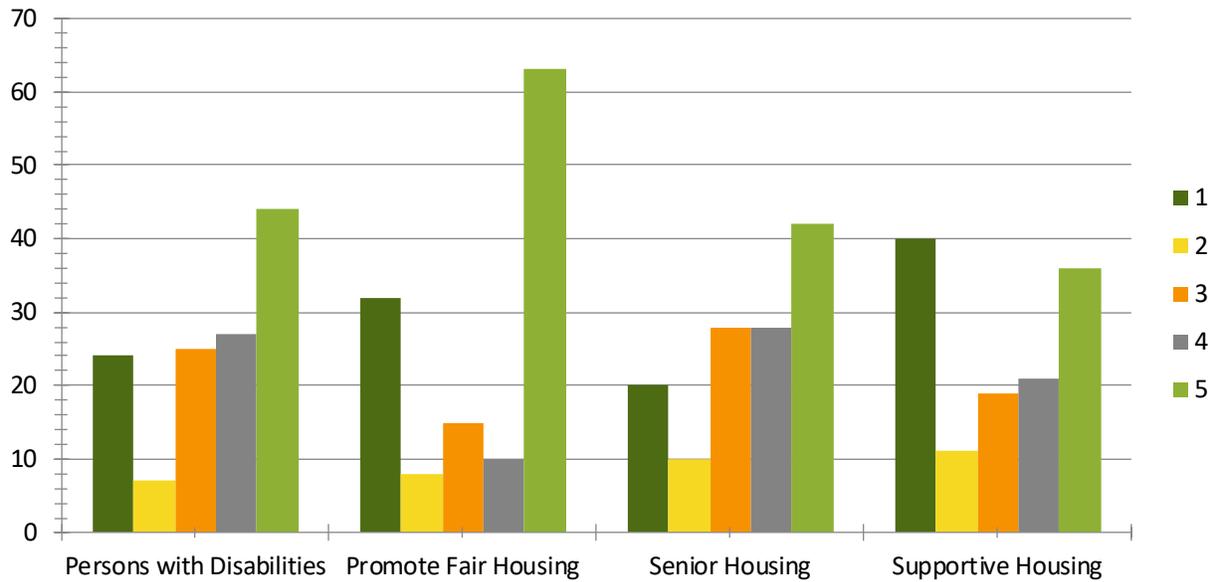
as a priority. The data shows a split in interest between one and five stars for property maintenance assistance, as well as a split interest for rental assistance.

**Figure C-2: Community Assistance**



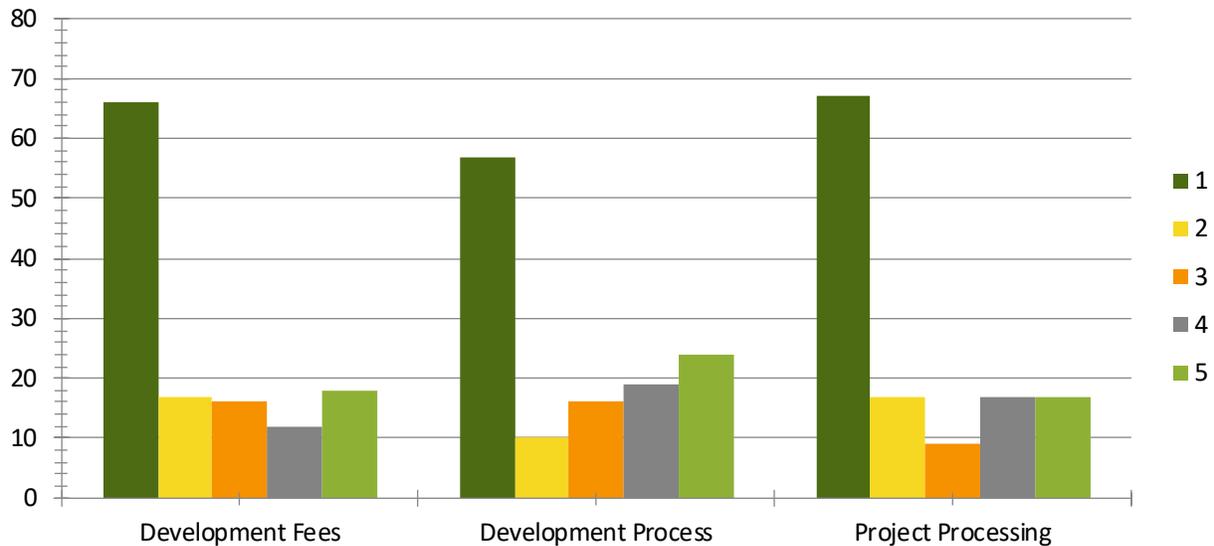
**Fair Housing Programs – Figure C-3** displays survey results for participant interest in fair housing programs. Fair housing is access to housing for all persons in Orange, regardless of age, disability, race, religion, familial status, or gender. The data shows that majority of participants were interested in a variety of fair housing programs and policies. Programs and policies to promote, support and increase fair housing were most appealing to participants, followed by programs to encourage the development of housing for persons with disabilities. The data shows a split interest in supportive housing to provide emergency, short- and long-term housing.

**Figure C-3: Fair Housing**



**Streamlining Processes** – Figure C-4 displays survey results for participants interest in programs and policies to streamline the development process. Overall, participants showed little interest in streamlining the development process, including little interest in decreasing developments fees, expediting review process and streamlining the permit timeline.

**Figure C-4: Streamlining Processes**



**Slide 2: Potential Housing Locations**

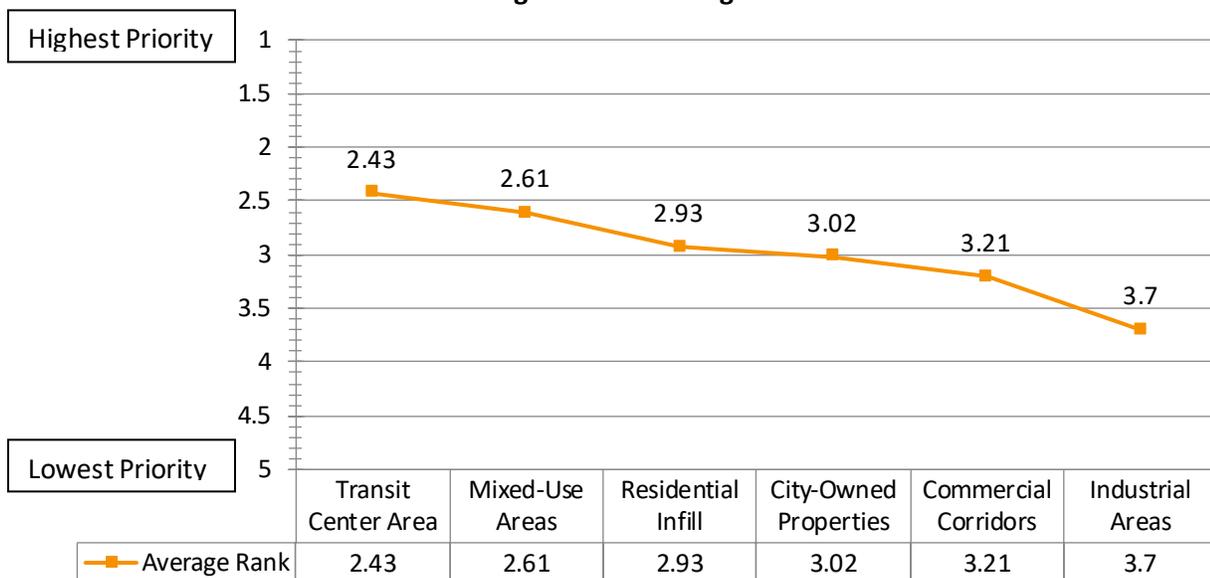
Survey participants were provided a list of areas for housing opportunities in Orange and asked to rank the areas based upon where they would most like to see housing in the City. Participants placed their highest priority area as number one at the top of the list, their second priority as number two, and so on. The potential areas included the following:



- **Transit Center:** Opportunities to develop a variety of housing types within proximity to Orange's Transportation Center, creating increased mobility for residents and accessibility to a transit system.
- **Mixed-Use Areas:** The development of housing in conjunction with other types of uses, such as commercial, retail, or office developments. This could include areas similar to Uptown Orange, Town and Country, West Katella, and South Main.
- **Residential Infill:** The development of land within existing neighborhoods provides the opportunity for new housing that complements the existing character and type of housing currently found.
- **City-Owned Properties:** Potential to develop a range of housing types on underutilized City owned-property.
- **Commercial Corridors:** Development of housing in commercial corridors, which are easily accessible and provide close access to goods, services, transportation, and other amenities. This could include the West Chapman and North Tustin Street Corridors, as well as the Lincoln Avenue corridor and the section of Katella between Tustin and Glassell.
- **Industrial Areas:** The potential for housing developments in areas currently used for industrial purposes.

**Figure C-5** displays the data for participant prioritization of potential housing opportunities in Orange. The line chart identifies each listed location's average ranking, the closer to one the ranking, the more important it was to participants. The survey results showed that new housing communities and residential in Transit Center Area the highest priority housing opportunities for participants. Participants were least interested in housing in underutilized industrial areas. It was also observed that participants were also interested in utilizing mixed-use areas for housing and residential infill as an opportunity for creating housing.

**Figure C-5: Housing Areas**





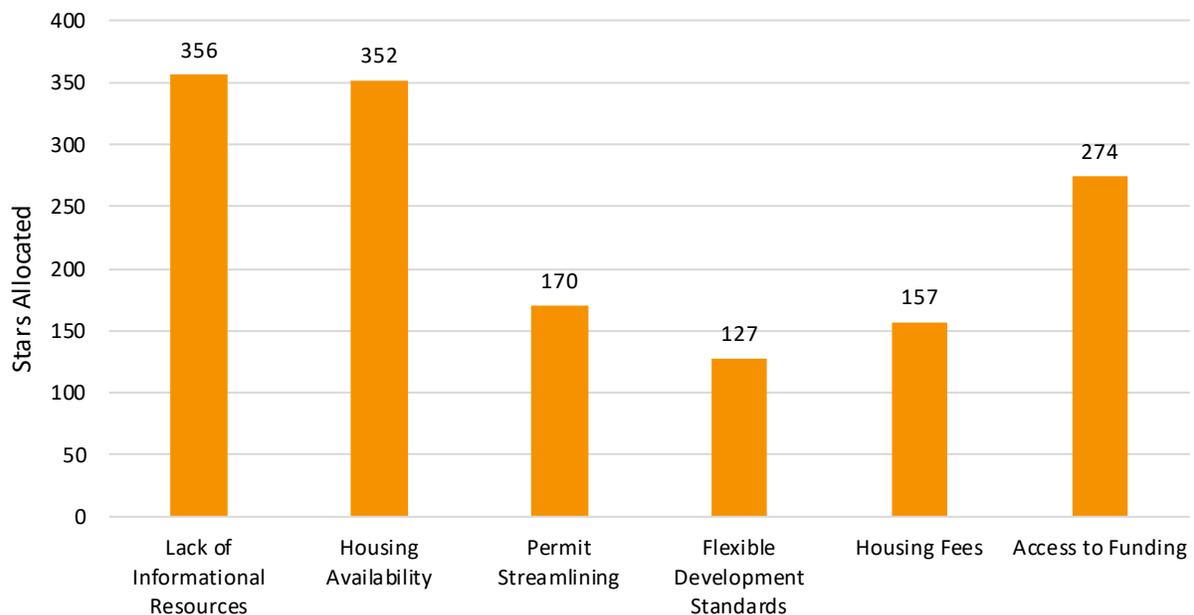
### Slide 3: Priority Programs to Remove Constraints to Housing

Participants were asked to identify barriers or constraints to the development of and access to housing within the City of Orange. The following constraints were provided:

- **Lack of Informational Resources:** Is it difficult to find informational resources on affordable housing within the City?
- **Housing Availability:** Is it difficult to identify and get access to affordable housing?
- **Permit Streamlining:** Do you believe the current development process could be expedited to encourage the development of housing?
- **Flexible Development Standards:** Would additional flexibility in development standards help to further the development of housing?
- **Housing Fees:** Is the cost of permits to build housing or ADUs an impact on the development of housing in Orange?
- **Access to Funding:** Is funding assistance availability an issue in obtaining and/or developing affordable housing in Orange?

Participants were provided stars to allocate among the listed potential barriers, prioritizing the barriers they would most like the City to focus on removing by increasing the allocation of stars. **Figure C-6** displays the results of participant’s priorities for removing barriers to housing. According to the data, participants would most like the City to focus of providing information regarding housing resources, funding opportunities and housing programs, closely followed by interest in having the City focus of housing availability and access to housing affordable to different income levels. Participants showed interest in having the City provide more funding opportunities; however, participants were least interested in removing barriers associated with the development process (permit streamlining, flexible development standards, and housing fess).

**Figure C-6: Constraints to Housing**





# Stakeholder Meetings

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This section contains all available meeting materials, including combined notes from both of the stakeholder meetings.

Stakeholder Meeting Notes – December 1, 2020

Housing Constraints

Entitlement Process	Amount of upfront work on tentative maps has gone up - most of the work is required up front now. Lengthens entitlement period
	Not requiring affordable or on-site affordable
	Tough line to walk on entitlement process - requirements vs. community character
	Tentative maps determine feasibility of the work, so certain details could be pushed off to post-entitlement period to lower upfront costs
	Lowering fees (park fees, development fees) - upfront cost
	Not necessarily easing up on process - maybe it's addressing the timing of review/entitlement process
	Needed application and project components should be known up front
	City staff as partners to the community - partnerships is the goal
	Offer fees in the form of a loan that could be paid over time
	Review the level of detail needed up front. Determining feasibility is important
	Cost issue of requiring details that may change as the building permit process gets closer
	Standard ministerial Design guidelines
	Lack of specific policies or programs to prioritize affordable housing - Density bonuses and incentives do not match existing zoning & ordinances
	Are local zoning & ordinances blocking the dev. of affordable housing?
	Specific Policy - Streamline development process to proceed by-right in some cases
	1. staff review process is longer than it needs to be for new development - no opportunity for discussion & conflicting comments between departments (Live interaction needed between all those who made comments on project)
	2. Current role of Design Review Committee - Density Bonus Development knowledge (DRC shouldn't have a role in density bonus applications)
	Cost and length of the process
Density Bonus projects - time consuming to get revisions to State law synced with local procedures - streamlined approach?	
Very specific code to increase ministerial review and reduce PC & CC review	
Neighborhood Opposition	Inviting supporters to the room to change the atmosphere at Council meetings
	Community members who do not understand what is being built
	Community outreach - door knocking
	-Showing the community differences in what densities look like
	Not in my backyard
	-traffic
	Recommendation letters from past partners to hand out to the community
Start with reaching out to community members in little neighborhoods	
Inform community of opportunity sites	
Land Price	Addressing developer fees and processing time of projects

Promoting Affordable Housing

Incentives & Subsidies	Financial incentives -loans
	Work with tweezers and not a blunt spoon - not necessarily need to create citywide policies/impacts
	City grants to help first time homebuyers with down payments to help fill the gap for affordable units
	Land use as a way to incentivize - up zoning increases value
	If up zone, asking for help to meet the City's requirements is reasonable -Discount factor to address market rate units taking on additional cost from affordable units
Micro Units/Tiny Homes	Room in Orange's Code for smaller studio units (250 SF) for seniors and special needs populations tied with affordability, amenities/services
	City to provide CDBG/HOME funds for ADUs and add deed restriction to ensure affordability for a number of years
	Pre-approved ADU plans / Permit ready ADU programs
Other	Specific policies to streamline and incorporate affordable housing
	addressing affordable housing through City resources & land
	storage requirements outside the units - non-code required closets in units count towards storage requirements
	No net loss - build in a potential buffer of available sites

What can the City do to Provide Access to Affordable Housing?

Communication and Education	Communicating the long-term value of affordable housing in a community
	Educational materials year round rather than affordable housing being tied to a particular project
	Communicating that people benefiting from affordable housing are those who already work in the community
	Show example of other work that has been done in another community
	Workforce housing - wording is important for perception
	Council and City Staff sharing that housing opportunities may benefit the children of people already living in the City
	Changing the narrative away from affordable housing being negative to a community
	Understanding the importance of stable housing for families/households and what it looks like
Other	Spending 30% of income on housing v 60-70% impacts how people live their lives and contribute
	Local community is moving out due to high cost of living
	Courage to approve affordable housing - subsidies/zoning are there
	Approval of projects is encouraging for future development
	Ordinance to rent out empty rooms in your house
	Increase supply of (affordable) housing - only 25% of those eligible for assistance receive it
	Inclusionary Housing Policy

New and Innovative Trends

Redevelopment Areas	Existing retail areas that may benefit from conversion to housing due to economic changes
	Church properties - housing on the property Keep Church use
	Aging church properties that could serve as good partnership locations
	Looking at underutilized institutional properties
	Continuing platinum triangle down Katella and continuing that pattern (redeveloping parking lot areas)
ADUs	Financing programs to help homeowners afford ADUS Buying incentives
Mixed Use	Little shops, medical clinics on first floor and residential above
	Less trips and helps the environment. Near mass transit/public transportation
	TODs - Transit Oriented Developments
	Horizontal mixed-use - housing with medical
Modular/Pre-Fab	ADU pre-fab units
	How is this handled in the Citycode?
Other	Co-living - 2 bedroom senior housing where occupants can split the rent Work with developers on this
	Housing Advocacy program - training of residents on how to give effective public comment
	Capacity buffer to catch "lost" units
	Look at unintended consequences of planning just to meet the City's RHNA
	Ensuring people are not displaced and priced out of current homes for newer upzone
	Equitable upzoning / growth

Engaging the Faith Based Community

Communicating and Partnership	Get to know faith-based community through specific contacts
	Churches very involved in helping people experiencing homelessness

City of Orange  
2021-2029  
**Housing Element Update**  
Stakeholder Meeting  
December 1, 2020  
[www.cityoforange.org/HousingElement](http://www.cityoforange.org/HousingElement)



1

2021-2029 Housing Element Update

### Agenda

- I. Housing Element Update Process
- II. Stakeholder Discussion
- III. Next Steps



2

### Housing Element Update Process




3

2021-2029 Housing Element Update

### Housing Element Features

-  Population and housing profile
-  Evaluation of existing programs and policies
-  Evaluation of housing constraints and resources
-  Analysis of sites to accommodate the City's RHNA Allocation
-  Policies, programs and quantified objectives to achieve the City's housing goals



4

2021-2029 Housing Element Update

### RHNA Draft Allocation: 2021 – 2029 Planning Period

Income Category	% of Area Median Income (AMI)	Income Range*		RHNA Allocation (Housing Units)**
		Min.	Max.	
Very Low Income	0 - 50% MFI	--	\$51,500	1,064 units
Low Income	51 – 80% MFI	\$51,501	\$82,400	603 units
Moderate Income	81 – 120% MFI	\$82,401	\$123,600	676 units
Above Moderate Income	>120% MFI	\$123,601	>\$123,601	1,585 units
<b>Total:</b>				<b>3,927 units</b>

\*Income range is based on the 2020 HUD Median Family Income (MFI) for Orange County of \$103,000.  
\*\*RHNA Allocation is in draft form and subject to change pending final approval by SCAG.



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2021-2029 Housing Element Update

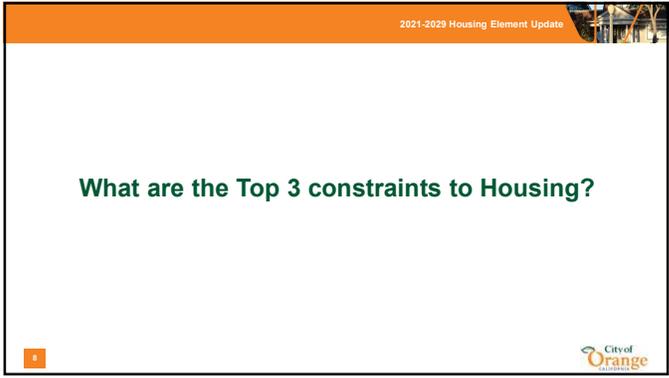
### Housing Element Update Schedule



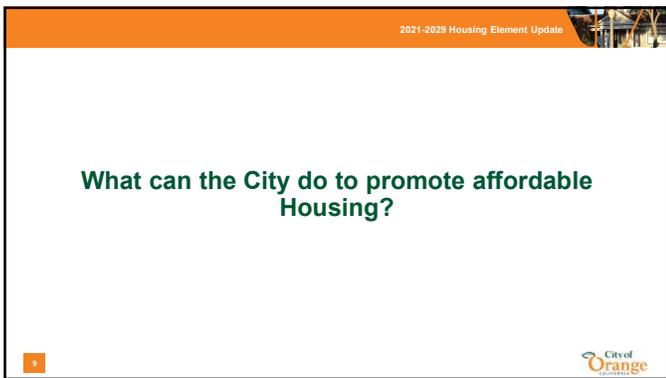

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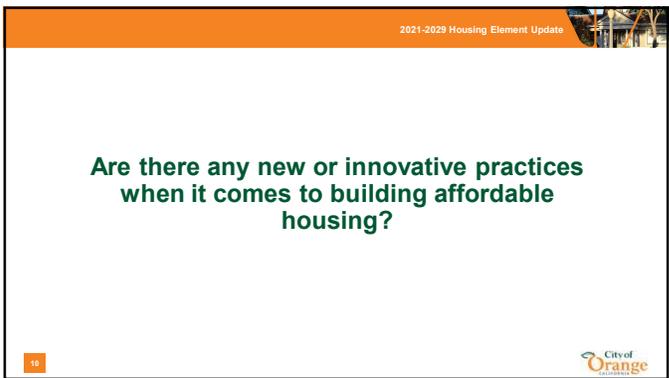
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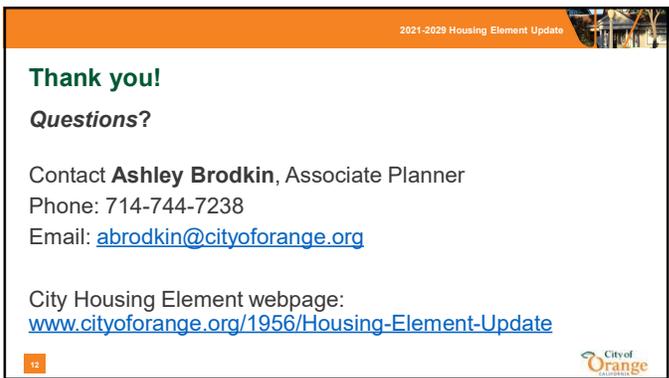
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# Public Comments

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This section contains all available public comments received by the City relating to the Housing Element update process. Personal information such as emails and addresses have been redacted for privacy reasons.

**Public Review Draft - Community Comments**

Public Comment	Response to Comments
<b>Section 1 (Introduction)</b>	
Ya no puedo seguir pagando donde vivo	Comment has been noted.
The good news in our draft Element is Orange has more than enough capacity to meet our RHNA obligation. This means the North Tustin Specific plan area, the Trails at Santiago Creek site, or the Chandler site are under any obligation to be a housing opportunity sites for this cycle of RHNA.	Comment has been noted.
<b>Section 2 (Community Profile)</b>	
Necesito ayuda para poder rentar un lugar más digno con mis dos hijas mi novio	Comment has been noted.
Provide more data on the number of senior living-alone in Orange. Note the % of male and female. Break down the demographics by voting district to see and compare current and future needs for each of the 6 districts in Orange.	Section 2.E.1 provides a breakdown of seniors living alone in Orange. See Figure 2-6 for male and females living alone in Orange.
Special Needs Groups 7. Homeless Page 2-6: You have misrepresented the truth when listing the factors contributing to homelessness. Unemployment and underemployment and a lack of affordable housing is very low on the list of factors contributing to homelessness. Mental illness and/or substance use disorder is the major reason for existence of the OC the homeless population. Surveys have shown about 67% of our homeless population have either a mental illness and/or a substance use disorder. Unsanitary conditions and misconduct is a verifiable sign of this factor. Certainly deinstitutionalizing the mentally ill was a factor beginning in the early 1970s California when had moved most mentally ill patients out of its State hospitals and, by passing Lanterman-Petris-Short Act (LPS), had made it very difficult to get them back into a hospital if they relapsed and needed additional care	Comment has been noted.
Soy una persona que necesita apoyo para seguir trabajando. Pero parte oportunidad de vivir	Comment has been noted.
<b>Section 3 (Housing Constraints, Resources, and AFFH)</b>	
Yo no quiero vivir en la calle y perder más de lo que e perdido en año y medio	Comment has been noted.
Explains constraints better in this section on reality that Orange is nearly built out and that available land (vacant or developed) is scarce, costly, and privately owned. Government constraints are not the true barrier of development rather its the cost of the	Comment has been noted.

**City of Orange**

2021-2029 Housing Element Update

<p>land. Infrastructure capacity is a major need for new development. New development must provide for their share of the increased load to the system.</p>	
<p>A. Nongovernmental Constraints 3. Economic Constraints</p> <p>The words, “home” and “homes,” found in various terms such as “homes on the market,” “median value of a home,” “cost of a home,” and “home value index,” need to be defined. Are they referring to single family residences only? Or are they referring to any type of housing, and if so, this needs to be clarified.</p>	<p>The distinction has been added to the section.</p>
<p><b>Section 4 (Housing Plan)</b></p>	
<p>Necesito ayuda ya que solo recibo incapacidad por 300 dólares a la semana y con eso no puedo pagar alimentos y renta</p>	<p>Comment has been noted.</p>
<p>Adopt a program for ADU development and assistance when the property owner enters into city affordable housing agreements for 55 years. Said program could offer incentives to reduce city fees including a reduced impact fee option (a defined formula) but no further reductions to setbacks, off-street parking, use for student housing, STRs, or other development code deviations.</p>	<p>Comment has been noted.</p>
<p>Adopt a program to facilitate partnerships that integrated market and non-profit affordable housing developers who will build market and affordable housing together. Projects for seniors, veterans, teachers, front-line and essential workers employed in Orange, or others, especially families, that are at risk of being homeless should be explored as part of any new residential development proposal above 20 units or those identified in our housing sites inventory.</p>	<p>Section 4 includes a number of policy actions addressing ADU development.</p>
<p>Develop a program to examine the safety status and a full inventory of our older apartment complexes in town. These complexes are often more affordable and at risk of being lost due to their age. There should a priority for them to reinvestment support to ensure their preservation and no loss of this needed housing stock.</p>	<p>Comment has been noted.</p>
<p>Develop a program to assist seniors living alone match with roommates or caretakers that are in need of housing assistance and care with daily living.</p>	<p>Comment has been noted.</p>
<p>Develop a program to facilitate private development of age qualified ownership communities with one-story design on standard and small lots. Program should prioritize creative development concepts such as paired housing units, micro units arranged around a common courtyard and or needed amenities, and condominiums with elevators and robust services and open space provided.</p>	<p>Comment has been noted.</p>

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2021-2029 Housing Element Update

<p>Restructure and refine a better toolkit for senior market rate and affordable senior housing development in our commercial zones when the subject site is adjacent to single-family neighborhoods. Such projects should continue to require a Conditional Use Permit with expanded legal findings to protect surrounding properties. The improved development standards should establish a lower FAR, level of intensity and max level of density, expanded setbacks in line with our multi-family residential zones, as well as height, minimum vehicle access, infrastructure, lighting, noise, taller perimeter wall heights, robust landscaping and trees, and privacy should all be included in a new set of objective development standards.</p>	<p>Comment has been noted.</p>
<p>Housing Policy Action 2H for Urban Mixed Use needs to be taken a step further with an Inclusionary Housing Ordinance that would require that all high density housing have a requirement of a percentage of affordable housing production at extremely low, very low and low income categories. This would provide for more equitable housing diversity in income levels throughout Orange. In addition it is important to make sure opportunity sites are not upzoned or rezoned without including affordable housing policies that will capture the financial and land use incentives being given to property owners and market rate developers. Developers are taking advantage of density bonuses without providing the affordable housing element that should be included. On page 4-9 it states "Continue to follow current State Density Bonus Law and further its implementation through a Density Bonus ordinance update." That update should include an Inclusionary Housing Ordinance to make sure good intentions actually result in housing built for extremely low, very low and low income levels at a commensurate rate with above moderate and market rate housing as our RHNA requires.</p>	<p>Comment has been noted.</p>
<p>SB1000 Environmental Justice Component Review should include multiple community engagement workshops in the communities of need in languages spoken in those communities.</p>	<p>Comment has been noted.</p>
<p>I would check the draft to make sure our mobile home parks are fully discuss in this section. These units are likely to be affordable and how will these units be preserved during this RHNA cycle. The complex off Rampart is worried the property owner will close the complex and sell the land to a developer. Maybe this needs to be a program in Section 4.</p>	<p>Mobile home parks are assessed in Section 2 and 3.</p>
<p><b>Appendix A (Review of Past Performance)</b></p>	
<p>Appendix A: Although Orange had exceeded 5th Cycle targets for low, moderate, and above moderate housing units, there was an unbalanced production of moderate and above moderate units, as opposed to extremely low, very low and low. This imbalance indicates that Orange's affordable housing policies have not been effective in incentivizing and producing housing for lower income</p>	<p>Comment has been noted.</p>

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<p>households. Although several areas were zoned Urban Mixed Use to encourage density, that density did not result in a significant amount of affordable housing. A great example of a missed opportunity are the large developments in the Town and Country area that don't include housing for low and very low income levels.</p>	
<p><b>Appendix B (Sites Analysis)</b></p>	
<p>Appendix B: Concerns about specific sites: The site at 1212 Struck Avenue, located behind sites at 1085 and 1095 N. Main, would also need to be developed in order for the Main Street sites to be appropriate for housing.</p>	<p>Comment has been noted.</p>
<p>The 1212 Struck Avenue Site may need soil testing for safety of housing units on the site.</p>	<p>Comment has been noted.</p>
<p>The Orangeland Recreation Vehicle Park at 1600 W. Struck Ave. is not an RV Parking lot; it serves as a short and long term home for several families, much as a motel would with some guests staying overnight, others for a few weeks, some much longer. It appears to be well maintained and filled to capacity. If this site were to be developed into housing, it likely would displace some people who are currently using it for housing.</p>	<p>Comment has been noted.</p>
<p>Markets, pharmacies, parks and other amenities need to be available within or in close proximity to the UMU proposed housing sites.</p>	<p>Comment has been noted.</p>
<p>The City's current density policies and incentives should be modified for the Urban Mixed Use Sites on Table B-3 to require each development approval to include the number of affordable units listed on Table B-3 at the very low and low income levels on each site to ensure that the RHNA requirements are met equitably.</p>	<p>Comment has been noted.</p>
<p>How does the Housing Element want to cover the likely change to development options and site configuration to the Irvine companies holdings near Jamboree and the toll roads. The opportunity to bring affordable units to this area may still be possible.</p>	<p>Comment has been noted.</p>
<p>The North Tustin Corridor should also be used to accommodate affordable housing. In addition to the Village Mall, there are other sites on Tustin which could accommodate tastefully designed, good quality housing for a mixture of income levels, as well as supportive and senior housing in close proximity to services, markets, stores, pharmacies and restaurants. Thank you for your work and serious consideration of the submitted comments. Bonnie Robinson</p>	<p>Comment has been noted.</p>

**From:** Chen, Nick  
**Sent:** Wednesday, May 19, 2021 4:52 PM  
**To:** Galmiche, Ines  
**Subject:** FW: [EXTERNAL] City of Orange Housing Element Update - Virtual Workshop  
**Attachments:** [Housing Element Strategy Letter by SJO2020 \(5\)CityOfOrange.pdf](#)

Nicholas Chen, AICP

Kimley-Horn | [REDACTED]  
[REDACTED]  
[REDACTED] [Instagram](#) | [Kimley-Horn.com](#)

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**From:** Ashley Brodkin [REDACTED]  
**Sent:** Tuesday, October 13, 2020 1:20 PM  
**To:** Chen, Nick [REDACTED]  
**Cc:** Mendoza, Molly <[REDACTED]>  
**Subject:** FW: [EXTERNAL] City of Orange Housing Element Update - Virtual Workshop

Hi Nick,

Would it be helpful for us to forward any comment letters we receive from the public and stakeholders? Or we can just share a list at the end. Let me know what would be best.

Thanks,

Ashley Brodkin



---

**From:** Bustamante-Pixa, Cecilia [REDACTED]  
**Sent:** Monday, October 12, 2020 2:27 PM  
**To:** Ashley Brodkin [REDACTED]  
**Cc:** Ross, Barry <[REDACTED]>; Zoch, Jeremy S [REDACTED]; Abushawish, Jordan A <[REDACTED]>  
**Subject:** Re: [EXTERNAL] City of Orange Housing Element Update - Virtual Workshop

Dear Ms. Brodkin,

Thank you for including St. Joseph Hospital in the City of Orange Housing Element Update process. As a major employer in the City of Orange, we have a great interest in ensuring that our residents, particularly the most vulnerable and low-income families, have access to adequate and affordable housing.



Since the pandemic makes it difficult to meet in person, we've developed a survey to begin the conversation community, which you can access on the City's Housing Element Update webpage. There is also an informational presentation on the 2021-2029 Housing Element Update, as well as a Fact Sheet to provide you information about the Housing Element and the City's update process.

We welcome input from service providers, community organizers, and advocacy groups that are actively working on furthering housing solutions for those with life circumstances that make housing access and stability hard to achieve. We anticipate reaching out again next month to engage in focused stakeholder meetings.

We hope you pass along this information to others you think would want to provide input on the future of housing in the City of Orange and we look forward to hearing from you.

Regards,

**Ashley Brodtkin**

Associate Planner

Community Development Department

[Redacted]

[Redacted]



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**From:** Chen, Nick  
**Sent:** Wednesday, May 19, 2021 4:52 PM  
**To:** Galmiche, Ines  
**Subject:** FW: Additional Comments Regarding Housing Element Survey

**Nicholas Chen, AICP**

**Kimley-Horn** | [REDACTED]  
[REDACTED]

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**From:** Ashley Brodkin [REDACTED]  
**Sent:** Wednesday, November 18, 2020 7:51 AM  
**To:** Chen, Nick [REDACTED]  
**Cc:** Mendoza, Molly [REDACTED]  
**Subject:** FW: Additional Comments Regarding Housing Element Survey

Public comment on Housing Element.

**Ashley Brodkin**



**From:** Bonnie Robinson <[REDACTED]>  
**Sent:** Sunday, November 15, 2020 5:13 PM  
**To:** Ashley Brodkin [REDACTED] >  
**Subject:** Additional Comments Regarding Housing Element Survey

Dear Associate Planner Brodkin,

I completed the city's Housing Element Survey a few days ago, along with some comments. I have a few additional comments that I would like to make and have considered when the Housing Element is updated.

It is briefly mentioned in the current Housing Element Document that, "The City will work to improve the quality of life for all residents by providing residential, commercial, industrial, and public uses that exist in harmony with the surrounding urban and natural environments." It also states, #5. "Environmental Protection. All projects shall be evaluated in accordance with the provisions of the California Environmental Quality Act. #5a Projects shall minimize the disruption of existing natural features such as vegetation, topography and ground features." The Housing Element Plan also goes on to address flooding and wildfire issues.

These continue to be extremely important issues that should be included in the updated Housing Element Plan and the guidelines followed by our City Planners, Planning Commissioners and City Council. With the continued development and infill throughout Orange and adjacent communities, it is imperative that we protect the remaining open space and natural resources we have in Orange. Areas that are currently zoned Resource/Agricultural, but designated Open Space in our City Plans need to be maintained as Open Space to balance out the needs of the wild species that inhabit them and the recreational and natural space needs of the residents of Orange. Just as the former Sully Miller property should not serve as a site for housing, except where previously zoned (28 homes), the area downstream from that site at 1425 N. Santiago Blvd should not be subjected to an engineered fill and grading that would destroy the natural and treasured habitat of that site. It is not an appropriate site for future housing and nothing should be done to threaten its current natural state.

There was one question on the survey regarding flexibility. I would like to clarify my response. In regards to building standards, I don't believe there should be flexibility. The standards have been written for the safety of future residents and businesses. As far as Mixed Use Developments, some flexibility is required in the types of buildings allowed to accommodate the needs of a site that mixes businesses with homes or offices.

Finally, the City of Orange should be doing everything in its power to build homes that are sustainable and that will contribute to improving our climate environment such as requiring solar on all new construction, using proper insulation that assists us in conserving resources and using sustainable, non polluting building materials, as well as including infrastructure that supports the use of renewable energy.

Thank you for the opportunity to provide input for the update of the Housing Element through the survey and these comments. I hope survey responses and comments will be seriously considered to help our community move forward in a way that is healthy, inviting and sustainable.

Sincerely,  
Bonnie Robinson

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*E-mail correspondence, along with any attachments, may be subject to the California Public Records Act; and as such may be subject to public disclosure unless otherwise exempt under the Act.*

**From:** Chen, Nick  
**Sent:** Wednesday, May 19, 2021 4:52 PM  
**To:** Galmiche, Ines  
**Subject:** FW: City of Orange Housing Element Update - Virtual Workshop

**Nicholas Chen, AICP**

**Kimley-Horn** | [REDACTED]  
[REDACTED]

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**From:** Ashley Brodkin [REDACTED]  
**Sent:** Wednesday, October 14, 2020 8:16 AM  
**To:** Chen, Nick [REDACTED]  
**Cc:** Mendoza, Molly [REDACTED]  
**Subject:** FW: City of Orange Housing Element Update - Virtual Workshop

Please see below for correspondence with Elizabeth Handsburg from People for Housing.

**Ashley Brodkin**



**From:** Elizabeth Hansburg P4H [REDACTED]  
**Sent:** Tuesday, October 13, 2020 4:58 PM  
**To:** Ashley Brodkin [REDACTED]  
**Subject:** Re: City of Orange Housing Element Update - Virtual Workshop

Sure, please put me on the list for stakeholder meetings. I would like to participate.

As far as general feedback, I am sure you and your staff know this, but for the record, California has a housing shortage. There are not enough homes available that low-income families, service-sector workers, and middle class professionals can afford. Only 25% of the people entitled to housing assistance in OC actually receive any. There is very little "naturally occurring affordable housing" (NOAH), older housing stock that becomes cheaper because it is old) because we have failed to allow enough new housing to be built.

The answer is to build more housing at higher densities, not just for low income people but for moderate income people, like young professionals who want to buy their first home. NIMBYism is the single greatest barrier to getting more housing built. Existing residents are resistant to new housing, density, and poor people. Housing elements (and their aligned zoning codes) need to identify places and where townhomes, apartments, and condos can be built with

minimal discretionary review. A good housing element can facilitate development in a way that minimizes opportunities for NIMBYism. It's in the city's own interest to make it's housing element, land use policies, and zoning code align to depoliticize the approval of housing development.

That's my general feedback.

On Tue, Oct 13, 2020 at 4:08 PM Ashley Brodkin [REDACTED] wrote:

Hello Elizabeth,

Thank you for your follow up. At this time we are looking for some general information about housing needs. There is a housing survey available on our Housing Element Update webpage (<https://www.cityoforange.org/1956/Housing-Element-Update>) to provide us with information. Additionally, we are anticipating holding stakeholder meetings next month if your organization would be interested in participating.

We anticipate additional community meetings in Spring 2021, once we complete the Public Review Draft of the Housing Element.

I look forward to hearing back from you and please let me know if I can answer any additional questions.

Regards,

**Ashley Brodkin**



**From:** Elizabeth Hansburg P4H <[REDACTED]>  
**Sent:** Tuesday, October 13, 2020 3:36 PM  
**To:** Ashley Brodkin <[REDACTED]>  
**Subject:** Re: City of Orange Housing Element Update - Virtual Workshop

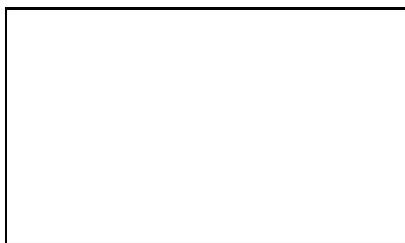
Hello, Thanks for reaching out. Are you collecting comments on a specific document, or you want a letter with our organization's priorities in general, but not in response to a specific proposal? Are you planning another community meeting?

Thank you,

--

**Elizabeth Hansburg**

Co-Founder & Executive Director



On Mon, Oct 12, 2020 at 10:37 AM Ashley Brodtkin < wrote:

Good morning,

The City of Orange is updating the Housing Element and you are invited to be part of the process. In order for the Housing Element to serve the community well, we can't do this alone. We need to hear from advocacy groups like yours. Please join us in planning for the future housing in Orange. Visit the City's Housing Element Update webpage (<https://www.cityoforange.org/1956/Housing-Element-Update>) to learn more and for opportunities to share your housing priorities and experiences.

Since the pandemic makes it difficult to meet in person, we've developed a survey to begin the conversation community, which you can access on the City's Housing Element Update webpage. There is also an informational presentation on the 2021-2029 Housing Element Update, as well as a Fact Sheet to provide you information about the Housing Element and the City's update process.

We welcome input from service providers, community organizers, and advocacy groups that are actively working on furthering housing solutions for those with life circumstances that make housing access and stability hard to achieve. We anticipate reaching out again next month to engage in focused stakeholder meetings.

We hope you pass along this information to others you think would want to provide input on the future of housing in the City of Orange and we look forward to hearing from you.

Regards,

**Ashley Brodtkin**

Associate Planner

Community Development Department

[REDACTED]

[REDACTED]



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August 17, 2020

Dear City of Orange:

St. Joseph Hospital is an acute-care not-for-profit faith-based hospital founded in 1929 by the Sisters of St. Joseph of Orange, located in the City of Orange, California. St. Joseph Hospital has 465 licensed beds, 379 of which are currently available, and a campus that is approximately 38 acres in size. The hospital's Primary Service Area includes the cities of Orange, Santa Ana, Tustin, Anaheim, Garden Grove, Villa Park, and Westminster. Major programs and services include cardiac care, critical care, diagnostic imaging, emergency medicine, obstetrics and behavioral/psychiatric services. St. Joseph Hospital dedicates resources to improve the health and quality of life for the communities it serves, with special emphasis on the needs of the economically poor and vulnerable.

Over the past two years, St. Joseph Hospital along with 13 other Community-based Organizations have been working together to address the issues of Economic Development, Housing, and Mental Health. In Central Orange County. The goal is to impact systemic change and determinants of health. In addition, St. Joseph Hospital has identified Homeless & Housing as one its key priorities of focus over the next three years. We will develop strategies to address lack of affordable housing under the framework of equity and racial disparities. We firmly believe that in order for communities to thrive, there must be equitable systems in place that support social consciousness, economic stability, and diverse development.

As you are aware, Housing Elements for the 6<sup>th</sup> cycle period (2021-29) are due to the California Department of Housing and Community Development by October 2021. St. Joseph Hospital understands the importance of each city's Housing Element in guiding housing programs, policies, zoning, and funding, as well as in reducing current obstacles to affordable housing development. We also understand the importance of Housing Elements in addressing racial equity in housing, particularly with the new statutory requirements mandating the inclusion of programs that affirmatively further fair housing in 6<sup>th</sup> cycle Housing Elements.<sup>1</sup> Together with local housing advocate groups, we support their efforts on ensuring that each jurisdiction increases affordable housing opportunities by implementing proven strategies, policies, and incentives that encourage affordable housing development.

St. Joseph Hospital seeks to ensure that jurisdictions engage the public in revising their Housing Elements. Public engagement is a necessary component of the Housing Element process as California Housing Element law states: "The local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element..." Broad participation and true engagement of the public increases the likelihood that the community members involved in the discussion and planning processes will support new housing strategies and housing developments. Public engagement should include participation from residents of diverse communities, housing consumers, service providers, and advocates.

As the City embarks upon the 2021-29 Housing Element update, St. Joseph Hospital requests that the City include us and our local housing advocates in the upcoming Housing Element review and evaluation of the current 5<sup>th</sup> cycle planning period goals, policies, and accomplishments.

St. Joseph Hospital further requests that the City conduct a robust public participation process for the 6<sup>th</sup> cycle Housing Element update and that it incorporate St. Joseph Hospital, affordable housing advocates, and residents of low-income communities in this process. We believe that you will achieve a stronger Housing Element update through diverse community participation, outreach and community planning process.

To ensure adequate public participation St. Joseph Hospital recommends the following:

1. The City should engage community participation and feedback at all stages of the Housing Element review and update. Participation should not be limited to public hearings.
2. The City should allow for various methods of engagement to encourage public participation. For instance, for members of the public who may not have access to the internet or a computer, or who are unable to use video applications, consistently provide an adequate telephone option – available in multiple languages – and generally ensure that members of the community who lack adequate technology can participate in meetings about the Housing Element review.
3. The City’s public participation and outreach opportunities should be meaningful and create various platforms (for example, virtual, written, workshops, webinars, community meetings, and public hearings) for the engagement of community members who reside in lower-income communities, affordable housing partners, Legal Aid organizations, and advocates.
4. The City should create a diverse Housing Element Working Group to evaluate the current Housing Element policies and accomplishments. This Working Group could help create policies and recommendations for the new Housing Element update to ensure that you meet the housing needs of those who are most vulnerable in the City.
5. The City should include affordable housing advocates in any anticipated Housing Element Work Group and provide the opportunity for them to provide their analysis on 5<sup>th</sup> cycle RHNA progress and be a part of developing policy recommendations on the 6<sup>th</sup> cycle update.
6. The City should engage community organizations representing and advocating for families and individuals residing in lower-income communities to ensure that members of these communities can directly participate and that the City considers their perspective as part of the evaluation and creation of policies that create affordable housing.

We would appreciate the City giving us notice of any public meetings regarding the Housing Element. We look forward to working with the City to encourage effective housing policies that will help create balanced housing development and create much-needed affordable housing in our local communities. If you have any questions, please feel free to contact me at [REDACTED]

Sincerely,

*Cecilia Bustamante Pixa*

Cecilia Bustamante Pixa, MPH, MHCML  
Director, Community Health Investment

<sup>1</sup>California Government Code § 8899.50 (Assembly Bill 686).

# Appendix D: Glossary of Housing Terms





# Glossary of Housing Terms

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**Above-Moderate-Income Household.** A household with an annual income usually greater than 120% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available legibility limits established by the U.S. Department of housing and Urban Development (HUD) for the Section 8 housing program.

**Affirmatively Furthering Fair Housing (AFFH):** Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

**Apartment.** An apartment is one (1) or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one (1) family for sleeping or living purposes and containing one (1) kitchen.

**Assisted Housing.** Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by federal, state, or local housing programs including, but not limited to Federal state, or local housing programs including, but not limited to Federal Section 8 (new construction, substantial rehabilitation, and loan management set-asides), Federal Sections 213, 236, and 202, Federal Sections 221 (d) (3) (below-market interest rate program), Federal Sections 101 (rent supplement assistance), CDBG, FmHA Sections 515, multi-family mortgage revenue bond programs, local redevelopment and in lieu fee programs, and units developed pursuant to local inclusionary housing and density bonus programs.

**Below-Market-Rate (BMR).** Any housing unit specifically priced to be sold or rented to low- or moderate-income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as "low income" or "moderate income." (2) The financing of housing at less than prevailing interest rates.

**Build-Out.** That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan. Build-out does not assume that each parcel is developed to include all floor area or housing units possible under zoning regulations.



**Community Development Block Grant (CDBG).** A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities and administered by the State Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

**Condominium.** A structure of two or more units, the interior spaces of which are individually owned; the balance of the property (both land and building) is owned in common by the owners of the individual units. (See “Townhouse.”)

**Covenants, Conditions, and Restrictions (CC&Rs).** A term used to describe restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

**Deed.** A legal document which affects the transfer of ownership of real estate from the seller to the buyer.

**Density Bonus.** The allocation of development rights that allow a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision or preservation of an amenity at the same site or at another location.

**Density, Residential.** The number of permanent residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

**Developable Land.** Land that is suitable as a location for structures and that can be developed free of hazards to, and without disruption of, or significant impact on, natural resource areas.

**Down Payment.** Money paid by a buyer from his own funds, as opposed to that portion of the purchase price which is financed.

**Duplex.** A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

**Dwelling Unit (DU).** A building or portion of a building containing one or more rooms, designed for or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

**Elderly Housing.** Typically, one- and two-bedroom apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

**Emergency Shelter.** A facility that provides immediate and short-term housing and supplemental services for the homeless. Shelters come in many sizes, but an optimum size is considered to be 20



to 40 beds. Supplemental services may include food, counseling, and access to other social programs. (See “Homeless” and “Transitional Housing.”)

**Extremely Low-Income Household.** A household with an annual income equal to or less than 30% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

**Fair Market Rent.** The rent, including utility allowances, determined by the United States Department of Housing and Urban Development for purposed of administering the Section 8 Program.

**Family.** (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An Individual or a group of persons living together who constitute a bona fide single-family housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind [Governor’s Office of Planning and Research, General Plan Guidelines].

**General Plan.** A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

**Goal.** A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.

**Green Building.** Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

**Historic Preservation.** The preservation of historically significant structures and neighborhoods until such time as, and in order to facilitate, restoration and rehabilitation of the building(s) to a former condition.

**Historic Property.** A historic property is a structure or site that has significant historic, architectural, or cultural value.

**Household.** All those persons—related or unrelated—who occupy a single housing unit. (See “Family.”)

**Housing and Community Development Department (HCD).** The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low-and moderate-income households.

**Housing Element.** One of the seven State-mandated elements of a local general plan, it assesses the existing and projected housing needs of all economic segments of the community, identifies



potential sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing. Under State law, Housing Elements must be updated every five years.

**Housing Payment.** For ownership housing, this is defined as the mortgage payment, property taxes, insurance and utilities. For rental housing this is defined as rent and utilities.

**Housing Ratio.** The ratio of the monthly housing payment to total gross monthly income; also called Payment-to-Income Ratio or Front-End Ratio.

**Housing Unit.** The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under State law.

**Housing and Urban Development, U.S. Department of (HUD).** A cabinet-level department of the federal government that administers housing and community development programs.

**Implementing Policies.** The City's statements of its commitments to consistent actions.

**Implementation.** Actions, procedures, programs, or techniques that carry out policies.

**Infill Development.** The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

**Jobs-Housing Balance.** A ratio used to describe the adequacy of the housing supply within a defined area to meet the needs of persons working within the same area. The General Plan uses SCAG's definition which is a job total equal to 1.2 times the number of housing units within the area under consideration.

**Land Use Classification.** A system for classifying and designating the appropriate use of properties.

**Live-Work Units.** Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

**Low-Income Household.** A household with an annual income usually no greater than 51%-80% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

**Low-income Housing Tax Credits.** Tax reductions provided by the federal and State governments for investors in housing for low-income households.

**Manufactured Housing.** Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the federal Manufactured Home Construction



and Safety Standards Act of 1974 under the administration of the U.S. Department of Housing and Urban Development (HUD). (See “Mobile home” and “Modular Unit.”)

**Mixed-Use.** Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A “single site” may include contiguous properties.

**Moderate-Income Household.** A household with an annual income usually no greater than 81%-120% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

**Monthly Housing Expense.** Total principal, interest, taxes, and insurance paid by the borrower on a monthly basis. Used with gross income to determine affordability.

**Multiple Family Building.** A detached building designed and used exclusively as a dwelling by three or more families occupying separate suites.

**Ordinance.** A law or regulation set forth and adopted by a governmental authority, usually a city or county.

**Overcrowded Housing Unit.** A housing unit in which the members of the household, or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one which is occupied by more than one person per room.

**Parcel.** A lot or tract of land.

**Planning Area.** The area directly addressed by the general plan. A city’s planning area typically encompasses the city limits and potentially annexable land within its sphere of influence.

**Policy.** A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program. (See “Program.”)

**Poverty Level.** As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or “poverty thresholds” varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

**Program.** An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the “who,” “how” and “when” for carrying out the “what” and “where” of goals and objectives.



**Redevelop.** To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

**Regional.** Pertaining to activities or economies at a scale greater than that of a single jurisdiction and affecting a broad geographic area.

**Regional Housing Needs Assessment.** A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.

**Rehabilitation.** The repair, preservation, and/or improvement of substandard housing.

**Residential.** Land designated in the General Plan and zoning ordinance for building consisting of dwelling units. May be improved, vacant, or unimproved. (See "Dwelling Unit.")

**Residential Care Facility.** A facility that provides 24-hour care and supervision to its residents.

**Residential, Multiple Family.** Usually three or more dwelling units on a single site, which may be in the same or separate buildings.

**Residential, Single-Family.** A single dwelling unit on a building site.

**Retrofit.** To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

**Rezoning.** An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

**Second Unit.** A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. "Granny Flat" is one type of second unit.

**Section 8 Rental Assistance Program.** A federal (HUD) rent-subsidy program that is one of the main sources of federal housing assistance for low-income households. The program operates by providing "housing assistance payments" to owners, developers, and public housing agencies to make up the difference between the "Fair Market Rent" of a unit (set by HUD) and the household's contribution toward the rent, which is calculated at 30% of the household's adjusted gross monthly income (GMI). "Section 8" includes programs for new construction, existing housing, and substantial or moderate housing rehabilitation.

**Shared Living Facility.** The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by Section 1566.3 of the California Health and Safety Code.

**Single-Family Dwelling, Attached.** A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See "Townhouse.")



**Single-Family Dwelling, Detached.** A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See "Family.")

**Single Room Occupancy (SRO).** A single room, typically 80-250 square feet, with a sink and closet, but which requires the occupant to share a communal bathroom, shower, and kitchen.

**Subsidize.** To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the forms of mortgage interest deductions or tax credits from federal and/or state income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

**Substandard Housing.** Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

**Supportive Housing.** Housing with no limit on length of stay, that is occupied by the target population as defined in California Health and Safety Code Section 53260(d), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. "Target population" means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [California Health and Safety Code Sections 50675.14(b) and 53260(d)]

**Target Areas.** Specifically, designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by Very-Low and Low-income households.

**Tax Increment.** Additional tax revenues that result from increases in property values within a redevelopment area. State law permits the tax increment to be earmarked for redevelopment purposes but requires at least 20 percent to be used to increase and improve the community's supply of very low- and low-income housing. Anaheim currently allocates 30 percent of its tax increment to increase and improve the community's supply of very low- and low-income housing.

**Tenure.** A housing unit is owner-occupied if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is owner-occupied only if the owner or co-owner lives in it. All other occupied units are classified as renter-occupied including units rented for cash rent and those occupied without payment of cash rent.

**Townhouse.** A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.



**Transitional Housing.** Shelter provided to the homeless for an extended period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See “Homeless” and “Emergency Shelter.”)

**Undevelopable.** Specific areas where topographic, geologic, and/or superficial soil conditions indicate a significant danger to future occupants and a liability to the City.



# Acronyms Used

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- ACS:** American Community Survey
- BMPs:** Best Management Practices
- CALTRANS:** California Department of Transportation
- CEQA:** California Environmental Quality Act
- CHAS:** Comprehensive Housing Affordability Strategy
- CIP:** Capital Improvement Program
- DDS:** Department of Developmental Services
- DIF:** Development Impact Fee
- DU/AC:** Dwelling Units Per Acre
- EDD:** California Employment Development Department
- FAR:** Floor Area Ratio
- FEMA:** Federal Emergency Management Agency
- HCD:** Department of Housing and Community Development
- HOA:** Homeowners Association
- HUD:** Department of Housing and Urban Development
- LAFCO:** Local Agency Formation Commission
- MFI:** Median Family Income
- NPDES:** National Pollutant Discharge Elimination System
- RTFH:** Regional Task Force on the Homeless
- RTP:** Regional Transportation Plan
- SCAG:** Southern California Association of Governments
- SPA:** Sectional Planning Area
- STF:** Summary Tape File (U.S. Census)
- TOD:** Transit-Oriented Development
- TDM:** Transportation Demand Management
- TSM:** Transportation Systems Management
- WCP:** Water Conservation Plan